

---

Alice A. Wade

alice.wade@postschell.com  
412-506-6364 Direct  
412-227-9065 Direct Fax  
File #: 215259

November 4, 2025

***VIA ELECTRONIC FILING***

Matthew Homsher, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street, 2nd Floor North  
P.O. Box 3265  
Harrisburg, PA 17105-3265

**Re: Sheron Lisowski v. PPL Electric Utilities Corporation  
Docket No. C-2025-3057780**

Dear Secretary Homsher:

Attached please find the Preliminary Objections of PPL Electric Utilities Corporation to the Complaint of Sheron Lisowski in the above-referenced proceeding. An unredacted version of these Preliminary Objections was previously filed on October 22, 2025. Pursuant to instruction from the Secretary's Bureau, PPL Electric is refiled the redacted version of the Preliminary Objections. Copies will be provided as indicated on the Certificate of Service.

The Complaint indicates that a Protection From Abuse ("PFA") order has been issued for the Complainant's personal safety or welfare. Comp. ¶ 6. As such, PPL Electric has omitted information from these Preliminary Objections that could be used to determine the Complainant's location and contact information.

PPL Electric is also electronically filing and serving a redacted Certificate of Service, which redacts the Complainant's service address. Counsel for PPL Electric hereby certifies that it has served a copy of these Preliminary Objections upon the Complainant, at the information provided in the unredacted version of the Complaint.

PPL Electric will submit a copy of this cover letter, as well as an unredacted hard copy of the Certificate of Service to the Secretary's Bureau via first-class mail or Commission's ShareFile folder for confidential filings, to the extent it is required to do so by the Secretary, or the Administrative Law Judge assigned to this matter.

Matthew Homsher, Secretary  
November 4, 2025  
Page 2

Respectfully submitted,

A handwritten signature in black ink, appearing to be 'AAW', written in a cursive style.

Alice A. Wade

AAW/bfc  
Attachment

cc: Certificate of Service

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing has been served upon the following persons, in the manner indicated, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

**VIA FIRST-CLASS MAIL**

Sheron Lisowski

XXXXX

XXXXX

XXXXX

Date: November 4, 2025



---

Alice Wade

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Sheron Lisowski,	:	
	:	
Complainant,	:	
	:	
v.	:	Docket No. C-2025- 3057780
	:	
PPL Electric Utilities Corporation,	:	
	:	
Respondent.	:	

---

**NOTICE TO PLEAD**

---

YOU ARE HEREBY ADVISED THAT, PURSUANT TO 52 PA. CODE § 5.101, YOU MAY FILE AN ANSWER TO THE ENCLOSED PRELIMINARY OBJECTIONS WITHIN TEN (10) DAYS OF THE DATE OF SERVICE HEREOF. YOUR ANSWER TO THE PRELIMINARY OBJECTIONS MUST BE FILED WITH THE SECRETARY OF THE PENNSYLVANIA PUBLIC UTILITY COMMISSION, P.O. BOX 3265, HARRISBURG, PA 17105-3265. A COPY SHOULD ALSO BE SERVED ON THE UNDERSIGNED COUNSEL.

Respectfully submitted,



---

Devin T. Ryan (ID # 316602)  
Alice A. Wade (ID # 335228)  
Post & Schell, P.C.  
One Oxford Centre  
301 Grant Street, Suite 3010  
Pittsburgh, PA 15219  
Phone: 717-612-6052  
Fax: 717-731-1985  
E-mail: dryan@postschell.com  
alice.wade@postschell.com

Kimberly A. Klock (ID # 89716)  
Michael J. Shafer (ID # 205681)  
PPL Services Corporation  
645 Hamilton Street, Suite 700  
Allentown, PA 18104  
Phone: 610-774-2599  
Fax: 610-774-4102  
E-mail: kklock@pplweb.com  
mjshafer@pplweb.com

Megan Rulli (ID # 331981)  
Post & Schell, P.C.  
17 North Second St., 12th Floor  
Harrisburg, PA 17101-1601  
Phone: 717-612-6012  
Fax: 717-731-1985  
E-mail: mrulli@ postschell.com

Date: October 22, 2025

Attorneys for PPL Electric Utilities Corporation

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Sheron Lisowski,	:	
	:	
Complainant,	:	
	:	
v.	:	Docket No. C-2025- 3057780
	:	
PPL Electric Utilities Corporation,	:	
	:	
Respondent.	:	

---

**PRELIMINARY OBJECTIONS OF  
PPL ELECTRIC UTILITIES CORPORATION TO THE  
COMPLAINT OF SHERON LISOWSKI**

---

AND NOW, comes PPL Electric Utilities Corporation (“PPL Electric”) and hereby files these Preliminary Objections, pursuant to the regulations of the Pennsylvania Public Utility Commission (“Commission”) at 52 Pa. Code § 5.101, and respectfully requests that the Complaint filed by Sheron Lisowski (“Complainant”) be dismissed in its entirety as against PPL Electric. In support thereof, PPL Electric states as follows:

**I. BACKGROUND**

1. PPL Electric furnishes electric distribution, transmission, and default supply services to approximately 1.4 million customers throughout its certificated service territory, which includes all or portions of twenty-nine counties and encompasses approximately 10,000 square miles in eastern and central Pennsylvania. PPL Electric is a “public utility,” an “electric distribution company,” and a “default service provider” as defined in Sections 102 and 2803 of the Pennsylvania Public Utility Code, 66 Pa. C.S. §§ 102, 2803.

2. By Secretarial Letter dated Thursday October 2, 2025, PPL Electric was served with the above-captioned Complaint. In the Complaint, the Complainant alleges that her daughter stole money from her. (Complaint ¶ 4.) As relief, the Complainant requests, that PPL Electric “pay the amount that was not paid in the year 2023” due to her daughter stealing money that was intended to pay the electric bills. (Complaint ¶ 5.)

3. PPL Electric herein files these Preliminary Objections to the Complaint. For the reasons explained below, PPL Electric respectfully requests that the Complaint be dismissed in its entirety and with prejudice as against PPL Electric for legal insufficiency pursuant to Sections 5.101(a)(2) and 5.101(a)(4) of the Commission’s regulations, 52 Pa. Code §§ 5.101(a)(2), 5.101(a)(4).

## **II. STANDARD OF REVIEW**

4. Pursuant to the Commission’s regulations, preliminary objections in response to a pleading may be filed on several grounds, including:

- (1) Lack of Commission jurisdiction or improper service of the pleading initiating the proceeding.
- (2) Failure of a pleading to conform to this chapter or the inclusion of scandalous or impertinent matter.
- (3) Insufficient specificity of a pleading.
- (4) Legal insufficiency of a pleading.
- (5) Lack of capacity to sue, nonjoinder of a necessary party or misjoinder of a cause of action.
- (6) Pendency of a prior proceeding or agreement for alternative dispute resolution.
- (7) Standing of a party to participate in the proceeding.

52 Pa. Code § 5.101(a) (emphasis added).

5. In ruling on preliminary objections, the Presiding Officer must accept as true all well-pled allegations of material facts as well as all inferences reasonably deducible therefrom. *Stilp v. Cmwlth.*, 910 A.2d 775, 781 (Pa. Cmwlth. 2006) (citing *Dep't of Gen. Serv. v. Bd. of Claims*, 881 A.2d 14 (Pa. Cmwlth. 2005)); accord *Complaint of Nat'l Fuel Gas Distrib. Corp. and Petition for an Order to Show Cause*, Docket No. P-00072343 (December 26, 2007). However, the Presiding Officer need not accept as true conclusions of law, unwarranted inferences from facts, argumentative allegations, or expressions of opinion. *Stanton-Negley Drug Co. v. Dep't of Pub. Welfare*, 927 A.2d 671, 673 (Pa. Cmwlth. 2007). For preliminary objections to be sustained, it must appear with certainty that the law will permit no recovery, and any doubt must be resolved in favor of the non-moving party. *Stilp*, at 781.

6. In addition, the Presiding Officer must determine whether, based on the factual pleadings, if recovery is possible. See *Rok v. Flaherty*, 527 A.2d 211, 214 (Pa. Cmwlth. 1987). Indeed, for preliminary objections to be sustained, it must appear with certainty that the law will permit no recovery. See *Stilp*, at 781; *Milliner v. Enck*, 709 A.2d 417, 418 (Pa. Super. 1998).

### **III. PRELIMINARY OBJECTIONS**

#### **A. PRELIMINARY OBJECTION NO. 1 – THE COMPLAINT IS LEGALLY INSUFFICIENT AND SHOULD BE DISMISSED WITH PREJUDICE AS AGAINST PPL ELECTRIC BECAUSE THE COMPLAINT FAILS TO ALLEGE ANY VIOLATIONS BY PPL ELECTRIC**

7. PPL Electric incorporates by reference Paragraphs 1 through 6 as if fully set forth herein.

8. The Complaint is legally insufficient and should be dismissed with prejudice as against PPL Electric because the Complaint fails to allege any violations by PPL Electric.

9. As a matter of law, the Complainant must show that the named utility is responsible or accountable for the problem described in the Complaint in order to prevail. *Patterson v. Bell Tel. Co. of Pa.*, 72 Pa PUC 196, 1990 Pa. PUC LEXIS 19, at \*8 (Order entered Feb. 8, 1990) (citing *Feinstein v. Phila. Suburban Water Co.*, 50 Pa. PUC 300 (1976)).

10. When “the Complaint fails to state a claim against the named respondent upon which the Commission may grant relief,” the Complaint is “insufficient as to substance,” and the “Respondent is entitled to judgment as a matter of law.” *Stabley v. Phila. Gas Works*, Docket No. F-2010-2186368, 2010 Pa. PUC LEXIS 231, at \*6 (July 29, 2010) (Initial Decision), *adopted without modification*, (Order entered Oct. 1, 2010); *see Coggins v. UGI Cent. Penn Gas Inc.*, Docket No. C-2012-2312796, 2012 Pa. PUC LEXIS 1497 (Sept. 10, 2012) (Initial Decision), *adopted without modification*, (Order entered Nov. 9, 2012).

11. In the Complaint, the Complainant alleges that because her daughter stole money from her, PPL Electric should “pay the amount that was not payed in the year of 2023.” (Complaint ¶ 5.)

12. The Complaint does not contain any factual averment that PPL Electric is responsible for the Complainant’s loss, however, the Complainant’s only request for relief is compensation from PPL Electric.

13. This is a Complaint not against PPL Electric, but against the Complainant’s daughter.

14. The Complaint does not allege that PPL Electric violated the Public Utility Code, the Commission’s regulations, a Commission order, or the Company’s Commission-approved tariff.

15. Therefore, the Complainant has failed to state a claim against PPL Electric upon which the Commission may grant relief. *See Rok*, 527 A.2d at 214; *Stilp*, 910 A.2d at 781.

16. Accordingly, the Complaint should be dismissed in its entirety and with prejudice as against PPL Electric.

**A. PRELIMINARY OBJECTION NO. 2 – THE COMPLAINANTS’ REQUEST FOR DAMAGES SHOULD BE DISMISSED BECAUSE THE COMMISSION HAS NO POWER TO AWARD DAMAGES**

17. PPL Electric incorporates by reference Paragraphs 1 through 16 as if fully set forth herein.

18. The portion of the Complaint requesting damages should be dismissed because the Commission cannot award damages.

19. In the Complaint, the Complainants request, among other things, that PPL Electric “pay the amount that was not payed in the year of 2023.” (Complaint ¶ 5.)

20. The Complainant does not allege that the charges on her bill were incorrect, nor that she was overbilled.

21. It is well-established that the Commission does not have authority to order a public utility to pay damages, as requested by the Complainants. *See DeFrancesco v. W. Pa. Water Co.*, 453 A.2d 595, 596-97 (Pa. 1982); *Elkin v. Bell of Pa.*, 420 A.2d 371, 375 (Pa. 1980); *Feingold v. Bell of Pa.*, 383 A.2d 791, 794-95 (Pa. 1977).

22. Here, the Complainants’ request for damages is impertinent matter “in the sense that it is irrelevant to [the] cause of action” because the Commission lacks authority to award damages. *See Stoner v. PPL Elec. Utils. Corp.*, Docket No. C-2013-2385588, p. 3 (Nov. 14, 2013 (order sustaining preliminary objections).

23. Indeed, requests for damages are regularly stricken from complaints as being impertinent matter. *See, e.g., id.* at pp. 3, 5; *Powell v. Verizon Pa., Inc.*, Docket No C-2011-226876,

2011 Pa. PUC LEXIS 652, at \*8-9, 16-17 (Dec. 21, 2011), *adopted by Comm'n*, 2012 PA. PUC LEXIS 374 (Order Entered Mar. 1, 2012); *J.E. Culbertson Co. v. Pa. Elec. Co.*, Docket No. C-2010-2204947, 2011 Pa. PUC LEXIS 781, at \*8-9, 12 (Feb. 4, 2011), *adopted by Comm'n*, Docket No. C-2010-2204947 (Order Entered Apr. 8, 2011).

24. Therefore, consistent with longstanding Commission precedent, the Complainants' request for damages is impertinent matter and should be stricken from his Complaint pursuant to 52 Pa. Code § 5.101(a)(2).

**IV. CONCLUSION**

WHEREFORE, PPL Electric Utilities Corporation respectfully requests that the Complaint be dismissed in its entirety and with prejudice as against PPL Electric Utilities Corporation pursuant to 52 Pa. Code §§ 5.101(a)(2) and 5.101(a)(4).

Respectfully submitted,



Kimberly A. Klock (ID # 89716)  
Michael J. Shafer (ID # 205681)  
PPL Services Corporation  
645 Hamilton Street, Suite 700  
Allentown, PA 18104  
Phone: 610-774-2599  
Fax: 610-774-4102  
E-mail: kklock@pplweb.com  
mjshafer@pplweb.com

---

Devin T. Ryan (ID # 316602)  
Alice A. Wade (ID # 335228)  
Post & Schell, P.C.  
One Oxford Centre  
301 Grant Street, Suite 3010  
Pittsburgh, PA 15219  
Phone: 717-612-6052  
Fax: 717-731-1985  
E-mail: dryan@postschell.com  
alice.wade@postschell.com

Megan Rulli (ID # 331981)  
Post & Schell, P.C.  
17 North Second St., 12th Floor  
Harrisburg, PA 17101-1601  
Phone: 717-612-6012  
Fax: 717-731-1985  
E-mail: mrulli@postschell.com

Date: October 22, 2025

Attorneys for PPL Electric Utilities Corporation

**VERIFICATION**

I, DONNA E. WEBSTER, being a Lead CS Operations Specialist at PPL Electric Utilities Corporation, hereby state that the facts above set forth are true and correct to the best of my knowledge, information and belief and that I expect PPL Electric Utilities Corporation to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa.C.S. § 4904 relating to unsworn falsification to authorities.

October 22, 2025

*Donna E Webster*