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Megan E. Rulli

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File #: 214428

December 9, 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: Kristine Cardaci v. PPL Electric Utilities Corporation  
Docket No. C-2025-3056935**

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Dear Secretary Homsher:

Attached for filing is the Motion in Limine of PPL Electric Utilities Corporation (“PPL Electric”) for the above-referenced proceeding. In the instant Motion, the Company requests an expedited response period of ten (10) calendar days to facilitate a ruling on the Motion in sufficient time before the hearing.

PPL Electric notes that 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 is 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 this Motion in Limine 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, to the extent it is required to do so by the Secretary, or the Administrative Law Judge assigned to this matter.

Please direct any questions regarding this submission to the undersigned.

Matthew Homsher, Secretary  
December 9, 2025  
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Respectfully submitted,

A handwritten signature in black ink, appearing to read 'M E Rulli', written in a cursive style.

Megan E. Rulli

MER/dmc  
Attachment

cc: The Honorable Erin. E. Gannon (*via email; w/attachment*)  
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**

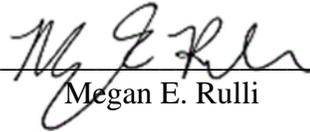
Kristine Cardaci

XXXXX

XXXXX

XXXXX

Date: December 9, 2025



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Megan E. Rulli

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Kristine Cardaci,	:	
	:	
Complainant,	:	
	:	
v.	:	Docket No. C-2025-3056935
	:	
PPL Electric Utilities Corporation,	:	
	:	
Respondent.	:	

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**NOTICE TO PLEAD**

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YOU ARE HEREBY ADVISED THAT, PURSUANT TO 52 PA. CODE § 5.103(c), YOU MAY FILE A REPLY TO THE ENCLOSED MOTION WITHIN TWENTY (20) DAYS AFTER THE DATE OF SERVICE. **IN THE INSTANT MOTION, THE COMPANY REQUESTS AN EXPEDITED RESPONSE PERIOD OF TEN (10) CALENDAR DAYS TO FACILITATE A RULING ON THE MOTION IN SUFFICIENT TIME BEFORE THE HEARING.** YOUR REPLY SHOULD BE FILED WITH THE SECRETARY OF THE PENNSYLVANIA PUBLIC UTILITY COMMISSION, P.O. BOX 3265, HARRISBURG, PA 17105-3265. A COPY OF YOUR REPLY SHOULD ALSO BE SERVED ON THE UNDERSIGNED COUNSEL.

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Date: December 9, 2025

Attorneys for PPL Electric Utilities Corporation

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Kristine Cardaci,	:	
	:	
Complainant,	:	
	:	
v.	:	Docket No. C-2025-3056935
	:	
PPL Electric Utilities Corporation,	:	
	:	
Respondent.	:	

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**MOTION IN LIMINE OF  
PPL ELECTRIC UTILITIES CORPORATION TO  
PROHIBIT THE COMPLAINANT FROM PRESENTING  
TESTIMONY AND EXHIBITS RELATED TO  
ALLEGATIONS THAT HER ELECTRIC SERVICE BILL(S)  
CONTAIN INCORRECT CHARGES**

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**TO ADMINISTRATIVE LAW JUDGE ERIN L. GANNON:**

PPL Electric Utilities Corporation (“PPL Electric” or the “Company”) hereby files this Motion in Limine pursuant to the Pennsylvania Public Utility Commission’s (“Commission”) regulations at 52 Pa. Code § 5.103 and requests that Administrative Law Judge Erin L. Gannon (the “ALJ”) prohibit Kristine Cardaci (“Complainant”) from presenting any testimony and exhibits related to allegations that her electric service bill(s) contain incorrect charges because she refuses to provide PPL Electric access to its meter for testing. The Complainant’s unreasonable refusal to provide the Company access to its own facilities prevents PPL Electric from fully investigating the Complainant’s claims. Further, without access to its meter, the Company will be unfairly prejudiced at the upcoming hearing because it will be unable to provide basic evidence in response to the Complainant’s high billing claims, *i.e.*, the results of a meter test.

For these reasons, PPL Electric respectfully submits this Motion in Limine and requests that the Complainant be prohibited from presenting any testimony or exhibits related to her high billing claims.

In support thereof, the Company states as follows:

**I. BACKGROUND**

1. PPL Electric is a public utility that provides electric distribution and provider of last resort services in Pennsylvania subject to the regulatory jurisdiction of the Commission. PPL Electric furnishes electric distribution, transmission, and provider of last resort electric supply services to approximately 1.5 million customers throughout its certificated service territory, which includes all or portions of 29 counties and encompasses approximately 10,000 square miles in eastern and central Pennsylvania.

2. On August 19, 2025, PPL Electric was served with the Formal Complaint filed by the Complainant, alleging that her electric service bill(s) contain incorrect charges.

3. On September 8, 2025, PPL Electric filed its Answer to the Complaint.

4. On September 19, 2025, an Initial Telephonic Hearing Notice was issued, scheduling the hearing for 10:00 AM on November 12, 2025, before the ALJ and providing the call-in details for the telephonic hearing.

5. On September 23, 2025, the ALJ issued a Prehearing Order, confirming the call-in details for the hearing and setting forth various procedural rules.

6. On November 12, 2025, the hearing convened as scheduled. However, when the hearing began, the parties learned that the Complainant's proposed exhibits had not been received by PPL Electric or the ALJ. As such, the hearing was continued to allow time for the Company and the ALJ to receive and review the Complainant's proposed exhibits.

7. On November 12, 2025, a Further Telephonic Hearing Notice was issued, rescheduling the hearing for Tuesday, November 25, 2025, at 9:00 AM before the ALJ.

8. On November 13, 2025, the ALJ issued a Second Prehearing Order for Telephone Hearing, confirming the timing and call-in details for the rescheduled hearing.

9. On or about November 19, 2025, the Complainant contacted the Office of Administrative Law Judge and requested a continuance of the further hearing scheduled for November 25, 2025. PPL Electric did not oppose the continuance.

10. On November 20, 2025, a Cancellation Notice was issued, which canceled the further hearing scheduled for November 25, 2025.

11. On November 21, 2025, a Rescheduled Further Telephonic Hearing Notice was issued, which rescheduled the hearing for Monday, January 12, 2026, at 10:00 AM before the ALJ.

## **II. MOTION IN LIMINE**

12. PPL Electric respectfully requests that the ALJ grant the instant Motion in Limine and prohibit the Complainant from presenting testimony or evidence related to allegations that her electric service bill(s) contain incorrect charges.

13. The Commission's regulations "vest the presiding officer with all necessary authority to control the receipt of evidence at the hearing, including, but not limited, to the ruling on the admissibility of evidence and the scope of direct and cross examinations." *Walden v. PECO Energy Co.*, Docket No. F-2019-3011507, 2020 Pa. PUC LEXIS 600, \*12 (Order entered Nov. 19, 2020) (citing 52 Pa. Code § 5.403).

14. Limiting the scope of evidence presented by the Complainant in this proceeding is necessary to prevent undue prejudice because that the Complainant is preventing PPL Electric from gathering and submitting basic evidence in response to the Complainant's high billing claims, *i.e.*, the results of a meter test.

15. In her Complaint, the Complainant alleges that her electric service bills for the December 2024 and January 2025 billing periods contain incorrect charges. (*See* Complaint ¶¶ 4-5.) As relief, the Complainant requests to be reimbursed approximately \$1,300 “for abusive charges.” (*See* Complaint ¶ 5.)

16. In response to the Complainant’s high billing claims and to prepare its direct case for the upcoming hearing, the Company attempted to remove the Complainant’s meter for testing on September 3, 2025, but the Complainant refused the Company access to the meter. On November 14, 2025, the Company again contacted the Complainant to alert her that the Company intended to visit the service address and remove its meter for testing, at no charge to the Complainant. However, the Complainant continued to refuse PPL Electric access to the meter, threatening to call the police and file a police report against the Company and/or its representatives if Company personnel entered her property to access and remove its meter for testing.

17. In addition, PPL Electric’s counsel contacted the Complainant on November 14, 2025, to discuss the Company’s ongoing need to access its meter to respond to the claims made in the instant Complaint. However, the Complainant continued to refuse access and renewed her threats to pursue legal action if the Company attempted to enter her property to access the meter.

18. The meter at the Complainant’s service address is the property of PPL Electric and the Company must be afforded access to the meter for testing in order to fully prepare for the hearing and respond to the Complainant’s high billing claims.

19. Indeed, the Complainant is required to provide PPL Electric access to its meter under both the Commission’s regulations and the Company’s Commission-approved tariff, and refusal to provide the Company access to its own facilities could be grounds for termination of service. *See, e.g.*, 52 Pa. Code §§ 57.24, 56.81(3), 56.231(3); *see also* Supp. No. 59 to Electric Pa.

P.U.C. No. 201, Fifth Revised Page No. 6B, Fourth Revised Page No. 14, and Fourteenth Revised Page No. 14A.<sup>1</sup>

20. The Complainant has placed the accuracy of PPL Electric's meter in dispute in this proceeding and her refusal to provide the Company with access to its meter for testing is unreasonable, given her claims that bills based on the meter's readings are inaccurate.

21. The Complainant is actively preventing the Company from gathering evidence to respond to her claims. As such, it would unfairly prejudice the Company if the Complainant was permitted to present testimony and evidence related to her high billing claims while blocking the Company from presenting its own relevant evidence in response.

22. Moreover, the Complainant has an interest in the results of a meter test because any evidence showing that the meter was not functioning accurately would be in her favor.

23. Thus, the Complainant's actions are also preventing the development of a full record in this case.<sup>2</sup>

24. Without access to the Complainant's meter for testing, the Company will be unable to thoroughly respond to the Complainant's high billing claims.

25. To prevent this undue prejudice, the Complainant should be prohibited from presenting any testimony and exhibits that relate to claims that her bills contain incorrect charges.

26. For these reasons, PPL Electric respectfully requests that the ALJ grant the instant Motion in Limine and prohibit the Complainant from introducing into evidence any exhibits and testimony related to claims that her electric service bill(s) contain incorrect charges.

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<sup>1</sup> PPL Electric has not issued a termination notice to the Complainant to date given the pendency of the instant Complaint, but maintains that the Complainant's failure to provide the Company access to its meter could be grounds for termination of the Complainant's service.

<sup>2</sup> As the meter is the property of PPL Electric, only the Company can test its accuracy and present the results of that test into evidence. The Company is unaware of any request by the Complainant for the Commission to test the meter pursuant to 52 Pa. Code § 57.22(b).

27. Finally, the Company notes that to the extent the Complainant allows the Company access to its meter for removal and testing by December 29, 2025 (*i.e.*, two weeks prior to the rescheduled hearing), it will withdraw the instant Motion. The Company maintains that two weeks is the minimum time needed to remove the meter, test it, and submit the results to both the Complainant and the ALJ prior to the hearing scheduled for January 12, 2026.

**III. CONCLUSION**

WHEREFORE, PPL Electric Utilities Corporation respectfully requests that Administrative Law Judge Erin L. Gannon grant this Motion in Limine and prohibit the Complainant from presenting any testimony and exhibits related to incorrect charges on her electric service bill(s). Further, the Company respectfully requests that the due date for any Answer to the instant Motion be due within ten (10) calendar days of its filing, *i.e.*, by December 19, 2025, and that the ruling on the instant Motion be issued by December 29, 2025, considering the hearing is scheduled for January 12, 2026.

Respectfully submitted,



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Date: December 9, 2025

Attorneys for PPL Electric Utilities Corporation

## VERIFICATION

I, MICHAEL J. SHAFER, being Senior Counsel at PPL Services 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.

Date: December 9, 2025



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Michael J. Shafer