

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Lori and Doug Stump	:	
	:	
v.	:	C-2025-3057290
	:	
PPL Electric Utilities Corporation	:	

INITIAL DECISION

Before
Chad L. Allensworth
Administrative Law Judge

INTRODUCTION

This Initial Decision denies a Formal Complaint that alleges overbilling, improper enrollment in budget billing and erroneous termination notice by an electric utility because Complainants failed to meet their burden of proving, by a preponderance of the evidence, that the electric utility violated the Public Utility Code, the Commission’s regulations or an order of the Commission.

HISTORY OF THE PROCEEDING

On September 8, 2025, Lori Stump and Doug Stump (collectively referred to as “Complainants”) filed a Formal Complaint (“complaint”) with the Pennsylvania Public Utility Commission (“Commission”) against PPL Electric Utilities Corporation (“PPL” or “Respondent”) alleging that the utility is threatening to shut off service or already had shut off service and there are incorrect charges on their electric bill.

Complaint ¶ 4. Complainants further asserted that they wanted “everything” checked and they never agreed to a payment plan. Complaint ¶ 5.

On September 29, 2025, Respondent filed its answer wherein it denied the material averments of the complaint. Specifically, Respondent acknowledged that it sent a termination notice but denied claims of incorrect billing. Answer ¶ 4.

On October 2, 2025, an Initial Call-In Telephonic Hearing Notice was issued scheduling the evidentiary hearing for December 1, 2025, at 10:00 a.m., and assigned the matter to me as the presiding officer. Additionally, on October 2, 2025, a Prehearing Order was issued that set forth requirements for the hearing.

The hearing was convened as scheduled on December 1, 2025. Complainants appeared *pro se*, testified on their own behalf and presented the following exhibits that were admitted into the record:

- Complainants Exhibit 1 – PPL bill with due date of November 20, 2024
- Complainants Exhibit 2 – PPL accounts summary from March 2023 to December 2023¹

PPL appeared and was represented by Emily Grecu, Esq. and Devin Ryan, Esq. PPL presented the testimony of Dana DeLong – PPL Senior Customer Service

¹ Five other Complainants’ exhibits, which purported to be the bills of Complainants’ neighbors, were not admitted due to relevancy and hearsay objections from PPL which I sustained. Tr. 33-34, 42.

Representative² who sponsored the following five exhibits that were all admitted into the record:

- PPL Exhibit 1 – Account activity statement
- PPL Exhibit 2 – Account contact history
- PPL Exhibit 3 – Complainants’ payment arrangement history
- PPL Exhibit 4 – PPL letter and meter test results
- PPL Exhibit 5 – PPL termination letter

The parties waived the filing of post-hearing briefs and made closing statements. Tr. 71-76.

The record closed on December 22, 2025, when the 77-page transcript was filed with the Commission.

FINDINGS OF FACT

1. Complainants are Lori Stump and Doug Stump who reside at 98 South King Street, Stevens, Pennsylvania, 17578 (“service address”). Tr. 13, 31.

2. Respondent is PPL Electric Utilities Corporation, which is a jurisdictional public utility providing electric service to Pennsylvania customers.

3. Complainants have resided at the service address for approximately 23 years. Tr. 13.

4. Complainants began receiving electric service from PPL on October 31, 2001. Tr. 48.

² Ms. DeLong has been employed by PPL for 26 years and as a Senior Customer Service Representative for approximately two years. Tr. 43-44.

5. Ms. Stump has asked PPL personnel to come to the service address to check for electrical problems, but PPL advised them that Complainants would have to hire their own electrical person to check for electrical problems. Tr. 16.

6. Complainants' electric bills are approximately \$1,500.00 per month. Tr. 16.

7. Complainants' bills increased approximately ten years ago. Tr. 18.

8. The service address was built in 1850 and is a two-story, three-bedroom, one-and-a-half-bathroom home. Tr. 24.

9. The service address uses LED lights, an electric heat pump, and electric fireplaces. Tr. 18, 20-24.

10. The heat pump at the service address was replaced in approximately 2022 and is an "efficiency heater". Tr. 21, 33.

11. The roof at the service address was replaced in 2023. Tr. 24, 33, 37.

12. The double pane windows at the service property were replaced approximately eight years ago. Tr. 24, 33, 37.

13. The updated appliances, windows and roof did not result in reduced electricity usage. Tr. 33.

14. The appliances that run on electricity at the service address include: a refrigerator, oven, microwave, water heater, washer and dryer. Tr. 24-25.

15. There are two people (i.e., the Complainants) that reside at the service address, and this number has not changed in the past few years. Tr. 27-28.

16. The service address did not have air conditioning between June 2025 and July 2025 due to an issue with the air conditioning unit. Tr. 40.

17. Complainants' amount due as of the date of the hearing was \$4,315.91. Tr. 49.

18. PPL issued a termination notice to Complainants on September 2, 2025 with termination scheduled to occur as early as September 16, 2025. Tr. 49-50.

19. Complainants' outstanding balance at the time the termination notice was issued was \$1,845.99. Tr. 50.

20. PPL did not terminate service to Complainants. Tr. 50.

21. On October 9, 2025, PPL conducted a meter test of Complainants' meter whereby Complainants' meter tested with the following accuracy: 99.99% for the full load test, 100.01% for the light load test and 99.99% for average accuracy. Tr. 55; PPL Exhibit 4.

22. On October 13, 2025, PPL sent the meter test results to Complainants. PPL Exhibit 4.

23. All the bills issued by PPL to Complainants were actual bills based on readings recorded by the meter at the service address. Tr. 55-56; PPL Exhibit 1.

24. PPL billed Complainants for the following kilowatt hour (“kWh”) usage from December 2021 to October 2025:

Billed	Days in bill	Total kWh Used		Billed	Days in bill	Total kWh Used
12/02/2021	30	2906		11/30/2023	33	3370
01/04/2022	33	3526		01/03/2024	34	4442
02/02/2022	29	3652		02/01/2024	29	4723
03/03/2022	29	3576		03/04/2024	30	4358
04/01/2022	29	3047		04/03/2024	32	3976
05/03/2022	32	2458		05/02/2024	29	2707
06/02/2022	30	2068		06/03/2024	29	1807
07/01/2022	29	2957		07/02/2024	31	2459
08/02/2022	32	4429		08/01/2024	30	2331
08/31/2022	29	2647		08/30/2024	29	2434
09/30/2022	30	2086		10/01/2024	32	2046
10/31/2022	29	2310		10/30/2024	29	1997
11/30/2022	32	3760		12/02/2024	29	2891
01/05/2023	35	3740		01/02/2025	34	7629
01/31/2023	27	4513		02/03/2025	31	9562
03/02/2023	30	4775		03/04/2025	31	8531
03/31/2023	29	4367		04/02/2025	29	4737
05/02/2023	32	3032		05/02/2025	30	2120
06/01/2023	30	1796		06/03/2025	32	2373
06/30/2023	29	1885		07/02/2025	29	2690
08/01/2023	32	2395		08/01/2025	30	3251
08/30/2023	29	1581		09/02/2025	29	2212
09/29/2023	30	1463		10/01/2025	32	2009

Billed	Days in bill	Total kWh Used		Billed	Days in bill	Total kWh Used
10/30/2023	29	1888		10/30/2025	29	2358

PPL Exhibit 1.

25. Complainants' bill due in January 2025 reflected usage of 224 kWh per day. Tr. 56.

26. Complainants' bill due in January 2024 reflected usage of 130 kWh per day. Tr. 56.

27. Complainants' bill due in February 2025 reflected usage of 308 kWh per day. Tr. 56-57.

28. Complainants' bill due in February 2024 reflected usage of 162 kWh per day. Tr. 57.

29. Complainants' bill due in March 2025 reflected usage of 275 kWh per day. Tr. 57.

30. Complainants' bill due in March 2024 reflected usage of 145 kWh per day. Tr. 57.

31. Complainants enrolled in budget billing with PPL on October 5, 2017. Tr. 58-59.

32. Complainants' kWh usage was higher than normal from January 2025 to April/May 2025. Tr. 60.

33. There is no indication that Complainants requested to be taken off budget billing. Tr. 61-62.

DISCUSSION

BURDEN OF PROOF

Complainants allege that PPL threatened to shut off service, they did not agree to a budget plan and there were incorrect charges on their bill. Complaint ¶¶ 4-5.

The party seeking affirmative relief from the Commission bears the burden of proof. 66 Pa.C.S. § 332(a). As a matter of law, a complainant must show that the named utility is responsible or accountable for the problem described in the complaint to prevail. *Patterson v. Bell Tel. Co. of Pa.*, 72 Pa.P.U.C. 196 (1990); *Feinstein v. Phila. Suburban Water Co.*, 50 Pa. PUC 300 (1976). This must be shown by a preponderance of the evidence. *Samuel J. Lansberry, Inc. v. Pa. Pub. Util. Comm'n*, 578 A.2d 600 (Pa. Cmwlth. 1990). A preponderance of evidence is that which is more convincing, by even the smallest amount, than that presented by the other party. *Se-Ling Hosiery v. Margulies*, 70 A.2d 854 (Pa. 1950).

Additionally, any finding of fact necessary to support the Commission's adjudication must be based upon substantial evidence. *Mill v. Pa. Pub. Util. Comm'n*, 447 A.2d 1100 (Pa. Cmwlth. 1982); *Edan Transp. Corp. v. Pa. Pub. Util. Comm'n*, 623 A.2d 6 (Pa. Cmwlth. 1993); 2 Pa.C.S. § 704. More is required than a mere trace of evidence or a suspicion of the existence of a fact sought to be established. *Norfolk & W. Ry. v. Pa. Pub. Util. Comm'n*, 413 A.2d 1037 (Pa. 1980); *Erie Resistor Corp. v. Unemployment Compensation Bd. Of Rev.*, 166 A.2d 96 (Pa. Super. 1960); *Murphy v. Dep't. of Pub. Welfare, White Haven Ctr.*, 480 A.2d 382 (Pa. Cmwlth. 1984).

Finally, the offense must be a violation of the Public Utility Code (“Code”), the Commission's regulations, or an outstanding order of the Commission. 66 Pa.C.S. § 701.

This means that Complainants must submit sufficient evidence to establish a *prima facie* case that PPL overcharged them or improperly threatened to terminate service. If they do, then the burden of going forward with the evidence, sometimes called the burden of persuasion, to rebut the evidence of the Complainants shifts to Respondent. If the evidence presented by Respondent is of co-equal weight, Complainants have not satisfied the burden of proof. Complainants would then have to provide additional evidence to rebut the evidence of Respondent. *Burleson v. Pa. Pub. Util. Comm'n*, 443 A.2d 1373 (Pa. Cmwlth. 1982), *aff'd*, 461 A.2d 1234 (Pa. 1983) (“*Burleson*”). While the burden of persuasion may shift back and forth during a proceeding, the burden of proof never shifts. The burden of proof always remains on the party seeking affirmative relief from the Commission. *Milkie v. Pa. Pub. Util. Comm'n*, 768 A.2d 1217 (Pa. Cmwlth. 2001) (“*Milkie*”).

The burden of proof for “high bill” complaints has been explained in *Waldron v. Philadelphia Electric Co.*, 54 Pa.P.U.C. 98 (1980), and its progeny. In *Waldron*, the Commission adopted the Michigan Public Service Commission’s policy announced in *Hallifax v. O & A Electric Co-Op*, Case No. U-5825 (May 1979), which stated that, while the accuracy of the meter is an important factor in resolving billing disputes, it is not the sole criterion. The Commission stated that it will also consider the following factors: the billing history of the complainant; any change in the number of occupants residing in the household; the potential for energy utilization; and any other relevant facts or circumstances that are brought to light during the complaint proceeding. *Waldron* at 100.

Consistent with the Commission's holding in *Bennett v. Peoples Natural Gas Co.*, Docket No. C-2009-2122979 (Opinion and Order entered Oct. 13, 2010), the *Waldron* Rule allows a complainant to establish a *prima facie* case in a “high bill” complaint by showing that the disputed bill is abnormally high when compared to prior usage patterns and his or her pattern of usage has not changed or by providing other relevant evidence showing that the disputed bill is unreasonably high. In evaluating a “high bill” complaint, the Commission may consider such evidence as “the billing history of the account, any change in usage patterns (such as a change in the number of occupants residing in the household or potential energy utilization), and any other relevant facts or circumstances that come to light during the proceeding.” *Id.* at 6; *see Thomas v. PECO Energy Co.*, Docket No. C-2010-2187197 (Opinion and Order entered Nov. 15, 2011) (holding that limiting the *Waldron* Rule to the three factors is too limiting).

ANALYSIS

Notice of Termination

Section 56.91 of the Commission’s regulations provides the general notice provisions and content requirements for termination notices. 52 Pa. Code § 56.91. It is uncontested in this case that PPL issued a termination notice to Complainants on September 2, 2025 with termination scheduled to occur as early as September 16, 2025 based on an outstanding balance of \$1,845.99. Tr. 49-50; PPL Exhibit 2. Complainants’ service was not terminated due to them filing the current complaint. Tr. 50.

Complainants do not allege that PPL failed to comply with any notice or content requirements in providing the termination letter. Additionally, PPL provided a copy of its form termination letter which indicates compliance with the content requirements for termination notices. PPL Exhibit 5. Therefore, Complainants failed to

establish that PPL violated the Code, Commission regulations or a Commission Order when issuing the termination notice.

Budget Plan

The Code requires each public utility to provide the following: “Every public utility shall furnish and maintain adequate, efficient, safe, and reasonable service and facilities . . . Such service and facilities shall be in conformity with the regulations and orders of the commission. . . .” 66 Pa.C.S. § 1501. The statutory definition of “service” is to be broadly construed. *Country Place Waste Treatment Co., Inc. v. Pa. Pub. Util. Comm'n*, 654 A.2d 72 (Pa.Cmwlth. 1995). Section 102 of the Code provides:

“**Service.**” Used in its broadest and most inclusive sense, includes any and all acts done, rendered, or performed, and any and all things furnished or supplied, and any and all facilities used, furnished, or supplied by public utilities, or contract carriers by motor vehicle, in the performance of their duties under this part to their patrons, employees, other public utilities, and the public, as well as the interchange of facilities between two or more of them

66 Pa.C.S. § 102.

Budget billing is a voluntary program offered by PPL where PPL will average a customer’s bill throughout the year and bill the customer based on an average of the most recent 12-month period. Tr. 58-59. Ms. Stump testified that Complainants never signed up for budget billing. Tr. 14. She further testified that, when she would call to get Complainants off the budget plan, the Complainants would be removed only to be placed back on the budget plan two months later. Tr. 14. Mr. Stump also testified that Complainants asked to be removed from budget billing. Tr. 69. Complainants did not provide any evidence as to specific dates that they requested to be removed from budget billing. Tr. 69.

PPL's witness, Ms. DeLong, credibly testified that Complainants enrolled in budget billing on October 5, 2017, and they have been enrolled in budget billing since that date. Tr. 58-59. Furthermore, the Complainants' bill and PPL account records clearly reflect that Complainants are on a budget billing plan with PPL. Complainants Exhibit 1; PPL Exhibit 1. There is also no record that Complainants have requested to be removed from the voluntary budget billing program. Tr. 61-62.

Based on the specific and credible testimony from Ms. DeLong and the corroborating documentary evidence, I find no basis to conclude that Complainants did not enroll in budget billing or elected to be removed from budget billing.³ Therefore, Complainants failed to establish that PPL violated the Code, Commission regulations or a Commission Order on enrollment in budget billing.

High Bill

Complainants do not allege a specific period where the kWh usage for service address was too high to be accurate, but they claim that their bills were too high for approximately ten years. Tr. 18. Specifically, Complainants aver that their monthly electric bills are approximately \$1,500.00 per month and provided a summary showing that kWh usage between March 2023 and December 2023 ranged from 1463 kWh (Sept. 2023 to Oct. 2023) to 4775 kWh (Mar. 2023). Tr. 16; Complainants Exhibit 2. Complainants testified that they have resided at the service address for approximately 23 years and the service address is a two-story, three-bedroom, one-and-a-half-bathroom home built in 1850. Tr. 13, 24. Complainants further testified that over the past couple years only two people have lived in the home and they have the following appliances that

³ I remind Complainants that they still have the option to remove themselves from budget billing with PPL and they should contact PPL about removal if this is their desired course of action.

run on electricity: a refrigerator, oven, microwave, water heater, washer, dryer, heat pump and electric fireplaces. Tr. 24-25, 27-28.

Complainants also testified to the following changes at the service address over the last eight years:

- Installed double pane windows approximately eight years ago,
- Installed new roof in 2023,
- Installed new heat pump in approximately 2022,
- Updated various appliances, and
- Use of LED light bulbs.

Tr. 18, 24, 33, 37.

Because Complainants do not indicate a specific period of high billing that they are contesting, the following table shows Complainants' kWh usage history from December 2021 to October 2025:

Billed	Days in bill	Total kWh Used		Billed	Days in bill	Total kWh Used
12/02/2021	30	2906		11/30/2023	33	3370
01/04/2022	33	3526		01/03/2024	34	4442
02/02/2022	29	3652		02/01/2024	29	4723
03/03/2022	29	3576		03/04/2024	30	4358
04/01/2022	29	3047		04/03/2024	32	3976
05/03/2022	32	2458		05/02/2024	29	2707
06/02/2022	30	2068		06/03/2024	29	1807

Billed	Days in bill	Total kWh Used		Billed	Days in bill	Total kWh Used
07/01/2022	29	2957		07/02/2024	31	2459
08/02/2022	32	4429		08/01/2024	30	2331
08/31/2022	29	2647		08/30/2024	29	2434
09/30/2022	30	2086		10/01/2024	32	2046
10/31/2022	29	2310		10/30/2024	29	1997
11/30/2022	32	3760		12/02/2024	29	2891
01/05/2023	35	3740		01/02/2025	34	7629
01/31/2023	27	4513		02/03/2025	31	9562
03/02/2023	30	4775		03/04/2025	31	8531
03/31/2023	29	4367		04/02/2025	29	4737
05/02/2023	32	3032		05/02/2025	30	2120
06/01/2023	30	1796		06/03/2025	32	2373
06/30/2023	29	1885		07/02/2025	29	2690
08/01/2023	32	2395		08/01/2025	30	3251
08/30/2023	29	1581		09/02/2025	29	2212
09/29/2023	30	1463		10/01/2025	32	2009
10/30/2023	29	1888		10/30/2025	29	2358

PPL Exhibit 1.

The only pattern recognizable from the table is that Complainants' kWh usage was inexplicably higher from January 2025 to March 2025 than it had been in prior years during that same period. PPL Exhibit 1. This was confirmed by Ms. DeLong at the hearing. Tr. 56-57, 60. However, by April 2025, Complainants' kWh usage had returned to similar levels to what they used in prior years during the same period. PPL Exhibit 1.

I do not find that Complainants established a *prima facie* case in this proceeding. 66 Pa.C.S. § 332; *Milkie; Burluson*. Although it appears that Complainants received comparatively higher bills from January 2025 to March 2025, Complainants' testimony and evidence lacked a detailed, persuasive basis to justify finding that they received incorrect bills, i.e., that the metered usage exceeded the actual usage for those months where their bills were comparatively higher. Moreover, the fact that Complainants' kWh usage returned to comparatively normal beginning in April 2025 with no change to the service address does not support a finding that Complainants were billed improperly.

Additionally, although not dispositive per *Milkie*, PPL did provide credible evidence that Complainants' meter was operating accurately. Tr. 55; PPL Exhibit 4. Specifically, Complainants' meter tested within the Commission's guidelines of two percent of 100 percent accuracy.⁴ 52 Pa. Code §§ 57.20, 57.24. Therefore, I conclude that Complainants have not proven their allegations of overbilling by a preponderance of the evidence.

CONCLUSIONS OF LAW

1. The Commission has jurisdiction over the subject matter of this Complaint. 66 Pa.C.S. § 701.

2. The party seeking affirmative relief from the Commission bears the burden of proof. 66 Pa.C.S. § 332(a). As a matter of law, a complainant must show that the named utility is responsible or accountable for the problem described in the

⁴ PPL provided evidence that all its bills to Complainants were based on actual meter readings and the meter at the service address tested with an average accuracy of 99.99%. Tr. 55-56; PPL Exhibit 4.

Complaint to prevail. *Patterson v. Bell Tel. Co. of Pa.*, 72 Pa.P.U.C. 196 (1990); *Feinstein v. Phila. Suburban Water Co.*, 50 Pa.P.U.C. 300 (1976).

3. Right to relief must be shown by a preponderance of the evidence. *Samuel J. Lansberry, Inc. v. Pa. Pub. Util. Comm'n*, 578 A.2d 600 (Pa. Cmwlth. 1990). A preponderance of evidence is that which is more convincing, by even the smallest amount, than that presented by the other party. *Se-Ling Hosiery v. Margulies*, 70 A.2d 854 (Pa. 1950).

4. Any finding of fact necessary to support the Commission's adjudication must be based upon substantial evidence. *Mill v. Pa. Pub. Util. Comm'n*, 447 A.2d 1100 (Pa. Cmwlth. 1982); *Edan Transp. Corp. v. Pa. Pub. Util. Comm'n*, 623 A.2d 6 (Pa. Cmwlth. 1993); 2 Pa.C.S. § 704. More is required than a mere trace of evidence or a suspicion of the existence of a fact sought to be established. *Norfolk & W. Ry. v. Pa. Pub. Util. Comm'n*, 413 A.2d 1037 (1980); *Erie Resistor Corp. v. Unemployment Comp. Bd. Of Rev.*, 166 A.2d 96 (Pa. Super. 1960); *Murphy v. Dep't. of Pub. Welfare, White Haven Ctr.*, 480 A.2d 382 (Pa. Cmwlth. 1984).

5. The offense must be a violation of the Public Utility Code, the Commission's regulations, or an outstanding order of the Commission. 66 Pa.C.S. § 701.

6. The *Waldron* Rule allows a complainant to establish a *prima facie* case in a “high bill” complaint by showing that the disputed bill is abnormally high when compared to prior usage patterns and his or her pattern of usage has not changed or by providing other relevant evidence showing that the disputed bill is unreasonably high. In evaluating a “high bill” complaint, the Commission may consider such evidence as the billing history of the account, any change in usage patterns (such as a change in the number of occupants residing in the household or potential energy utilization), and any other relevant facts or circumstances that come to light during the proceeding. *Bennett v.*

Peoples Natural Gas Co., Docket No. C-2009-2122979 (Opinion and Order entered Oct. 13, 2010); *Waldron v. Phila. Elec. Co.*, 54 Pa.P.U.C. 98 (1980); *Thomas v. PECO Energy Co.*, Docket No. C-2010-2187197 (Opinion and Order entered Nov. 15, 2011) (holding that limiting the *Waldron* Rule to the three factors is too limiting).

7. Complainants did not meet their burden of proof that PPL violated the Public Utility Code, or a Commission regulation or order by establishing a *prima facie* case. 66 Pa.C.S. § 332(a); *Burleson v. Pa. Pub. Util. Comm'n*, 443 A.2d 1373 (Pa. Cmwlth. 1982), *aff'd*, 461 A.2d 1234 (Pa. 1983); *Milkie v. Pa. Pub. Util. Comm'n*, 768 A.2d 1217 (Pa. Cmwlth. 2001).

ORDER

THEREFORE,

IT IS ORDERED:

1. That the Formal Complaint filed by Lori Stump and Doug Stump in the matter of Lori and Doug Stump v. PPL Electric Utilities Corporation at Docket No. C-2025-3057290 is denied.

2. That Docket No. C-2025-3057290 shall be marked as closed.

Date: March 10, 2026

/s/
Chad L. Allensworth
Administrative Law Judge