

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

Signature Acquisitions Limited, Complainant
v.
PPL Electric Utilities Corporation, Respondent

Docket No. C-2026-3060280

REPLY TO ANSWER AND NEW MATTER

Complainant, Signature Acquisitions Limited ("Complainant"), by its authorized representative, replies to the New Matter contained in the Answer and New Matter of Respondent, PPL Electric Utilities Corporation ("PPL Electric"), as follows:

1. Paragraphs 12 through 18 of Respondent's New Matter consist primarily of legal conclusions regarding representation requirements for corporate entities in adversarial proceedings before the Commission. To the extent a response is required, Complainant acknowledges that Signature Acquisitions Limited is a limited liability company and that Lee Kozokas is an authorized representative of the company.
2. To the extent Respondent asserts that the Commission's regulations require a corporate entity to be represented by counsel in adversarial proceedings before the Commission, Complainant will comply with any directives of the Commission regarding representation should the matter proceed to a hearing.
3. Complainant denies that the allegations raised in Respondent's New Matter provide a basis to dismiss the Complaint.
4. The Complaint concerns electric service accounts associated with 133 Broad Street, Pittston, Pennsylvania, a property formerly owned by Complainant.
5. The property was sold on March 4, 2022, as reflected in the HUD settlement statement previously provided to the Commission.
6. At the time of closing, ownership and possession of the property transferred to the buyer, and Complainant no longer had control over the premises or the electric service accounts associated with the individual units at that property.
7. Complainant maintains that electric service associated with the property should have been terminated or transferred at or near the time of the sale. Due to the passage of time, Complainant no longer has documentation of communications with the Company related to the termination of service.
8. Complainant disputes responsibility for electric charges incurred after the date of the property sale, when the premises were no longer owned or controlled by Complainant.
9. The informal complaint previously filed with the Commission's Bureau of Consumer Services was dismissed solely because the account in question was held by a business entity rather than an individual customer.
10. Complainant maintains that the balance transferred by Respondent to a later account is improper to the extent it includes charges incurred after the sale of the property and after possession had

transferred to the new owner.

WHEREFORE, Complainant respectfully requests that the Pennsylvania Public Utility Commission:

1. Sustain the Complaint;
2. Determine that Signature Acquisitions Limited is not responsible for electric charges incurred after the sale of the property located at 133 Broad Street, Pittston, Pennsylvania; and
3. Grant such other relief as the Commission deems just and proper.

Respectfully submitted,
Dated: March 16, 2026



Lee Kozokas
Authorized Representative
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