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File #: 215385

April 2, 2026

VIA ELECTRONIC FILING

The Honorable Emily A. Farren
Administrative Law Judge
PA Public Utility Commission
400 North Street
Harrisburg, PA 17120

Re: Edward Braskey v. PPL Electric Utilities Corporation
Docket No. C-2025-3057855

Your Honor:

Pursuant to Administrative Law Judge (“ALJ”) Emily Farren’s instruction to submit additional information and analysis regarding (1) regulations relevant to PPL Electric Utility Corporation’s (“PPL Electric” or the “Company”) document retention policy and (2) information about whether any other ratepayers were tied to the account associate with “Railroad Street.” (Tr., p. 113.) PPL Electric submits the following:

Regulatory Basis for Document Retention Policy

Document retention under the Pennsylvania Public Utility Commission is governed by 52 Pa. Code § 57.45, which directs electric utilities to preserve their records in accordance with National Association of Regulatory Utility Commissioners (“NARUC”), entitled “Regulations to Govern the Preservation of Records of Electric Gas and Water Utilities.” 52 Pa. Code § 57.45. The NARUC regulations are modified in some respects by the Commission’s regulations. Where they are not specifically modified by the Commission’s regulations, the NARUC regulations apply. Retention periods vary depending on the type of record. Revenue Accounting and Collecting records are similarly variable in their retention minimums, which range from being destroyed at the Company’s option to being retained for the lifetime of the Corporation.¹

In the instant case, Edward Braskey (“Complainant”) disputes a series of transfers beginning in 2024 from an account at “Railroad Street” that was opened in 2019 and closed in 2020. Document retention with respect to the application for utility service is controlled by a modification to the

¹ National Association of Regulatory Utility Commissioners, Regulations to Govern the Preservation of Records of Electric Gas and Water Utilities, Revised October 2007.

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NARUC regulations enumerated in 52 Pa. Code § 57.45, item no. 45(a), “Applications for utility service for which contracts have been executed” which provides a retention period of four-years. NARUCs regulations provide that item no. 45(a) covers, “Applications for utility service and other records.” Notably, the Commissions regulations specify that they modify the retention periods, and do not indicate that they intend to modify the nature of the item numbers. 52 Pa. Code § 57.45. Therefore, the four-year retention period as modified in the Commission regulations applies to “Applications for utility service and other records” as described in NARUC’s regulations. As such, the Company was not obliged to maintain application records beyond a four-year period.

Additional Ratepayer on the Railroad Street Account

The Company submits as late-filed **PPL Electric Exhibit No. 16** a screengrab of its record management system showing that no additional ratepayers were present on the “Railroad Street” account for the period from 2019-2020 during which the Complainant was listed as a ratepayer on the account, along with a brief piece of supplemental testimony (**PPL Electric Statement No. 1**) describing the exhibit.

Copies of this Exhibit and Testimony will be served as indicated on the Certificate of Service.

Respectfully submitted,



Alice A. Wade

AAW/bfc
Attachment

Cc: Secretary Matthew L. Homsher (*Letter and Certificate of Service only*)
Certificate of Service

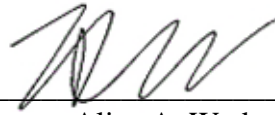
CERTIFICATE OF SERVICE

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 EMAIL AND FIRST-CLASS MAIL

Edward Braskey
250 S. Beech Street
Mount Carmel, PA 17851
chef.eddie1976@gmail.com

Date: April 2, 2026



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