

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Leo Karruli c/o Karruli, LLC	:	
	:	
v.	:	C-2026-3061106
	:	
FirstEnergy Pennsylvania Electric Company	:	

**INTERIM ORDER
DIRECTING COMPLAINANT TO CAUSE COUNSEL TO ENTER APPEARANCE**

On March 17, 2026, Karrli, LLC filed (Complainant) filed a Formal Complaint (Complaint) with the Pennsylvania Public Utility Commission (Commission) against FirstEnergy Pennsylvania Electric Company (FE PA, Company, or Respondent), regarding four different commercial accounts, averring the utility was threatening to shut off service or had already shut off service. Complainant checked the “other” box, essentially alleging the recorded consumption was inaccurate. Complaint ¶ 4. As relief, Complainant requested, *inter alia*, the Company be ordered to disclose meter test results, issue corrected bills or refunds, as appropriate, install smart meters away from the four power transformers on the customer side, and order “redundancy metering” for three months. Complaint ¶ 5.

Regarding service by the Commission, Complainant elected to be served by eService. Complaint ¶ 9.

The Complaint was signed and verified by Leo Karruli, Owner of Karruli, LLC. Complaint ¶ 11. Notably, Mr. Karruli indicated that Complainant was represented by John R. Kalenish, Esquire. Complaint ¶ 10.

On April 7, 2026, Respondent filed an Answer to the Complaint. FE PA admits it provides non-residential service to four delinquent accounts in Complainant’s name at Galleria Mall, 500 Industrial Park Road, Johnstown, Pennsylvania (service location), and issued termination for all four

accounts. It averred all accounts were properly billed and all meters were installed correctly. Further, it argued that at all times relevant to this proceeding, the Company's actions have been reasonable and performed in accordance with all applicable laws, as well as the Company's Commission-approved tariffs, the Public Utility Code, and Commission regulations and orders. Answer ¶ 4.

On April 14, 2026, the Commission issued an Initial Telephonic Hearing Notice, assigning this matter to me and scheduling an evidentiary hearing for June 11, 2026. The Hearing Notice reads, in pertinent part,

REPRESENTATION. If you are an individual, you may represent yourself or you may have an attorney represent you. All others, including a partnership, corporation, trust, association, or governmental agency or subdivision, must be represented by an attorney licensed to practice law in Pennsylvania, or admitted *pro hac vice*. Only an attorney may represent someone else.

See Hearing Notice, pg, 2.

Also on April 15, 2026, I issued a Prehearing Order, which reads, in pertinent part,

REPRESENTATION. If you are an individual, you may represent yourself or you may have an attorney represent you. All others, including a partnership, corporation, trust, association, or governmental agency or subdivision, must be represented an attorney licensed to practice law in Pennsylvania, or admitted *pro hac vice*. And, unless you are an attorney, you may not represent someone else.

See Prehearing Order, pg. 4 (citations omitted).

The Commission's regulations provide that "[i]n adversarial proceedings, partnerships, corporations, trusts, associations, agencies, political subdivisions and government entities shall be represented only by . . . an attorney." 52 Pa. Code § 1.21. An adversarial proceeding is defined as "a proceeding initiated by a person to seek authority, approvals, tariff changes, enforcement, fines,

remedies or other relief from the Commission which is contested by one or more other persons and which will be decided on the basis of a formal record.” 52 Pa. Code § 1.8.

A non-attorney owner/operator of a limited liability corporation may file a complaint, but, once an answer is filed, the limited liability corporation must thereafter be represented by counsel. *Cars R Us c/o Holman Copeland v. PGW*, Docket No. C-2008-2033437 (Order entered February 4, 2010). The absence of an attorney where one is required deprives the Commission of jurisdiction to adjudicate the matter. *Scheaffer v PPL Electric Utilities Corp.*, Docket No. F-2016-2577647 (Opinion and Order entered April 3, 2018).

The Commission’s obligation to require attorneys in adversarial proceedings for parties other than individual *pro se* proceedings is well-settled:

In Pennsylvania, the Supreme Court is responsible for regulating the practice of law, and this Commission is bound by the Supreme Court’s rules. The only persons authorized to practice law in Pennsylvania are as follows: (1) persons fully admitted to the Pennsylvania Bar; (2) persons admitted *pro hac vice* under Rule 301; and (3) persons qualified as certified legal interns under Rule 321. The Pennsylvania Supreme Court in *Shorz v. Farrell*, 327 Pa. 81, 193 A.20 (1937), held that if the nature of an administrative hearing is to determine questions of fact or interpretation of administrative law, then the hearing is of a judicial character. Any participation in such a hearing constitutes the practice of law. Accordingly, it would be unlawful to allow non-attorney representation in adversarial proceedings before the Commission.

James and Judith Simon v. Franklin Water Company, Docket No. C-00956589 (Order entered January 29, 1996).

Complainant clearly identifies itself as “Karruli, LLC” in the Complaint and indicates it is represented by Mr. Kalenish. To date, however, Mr. Kalenish has not filed a notice of appearance.

C-2026-3061106 - KARRULI LLC v. FIRSTENERGY PENNSYLVANIA ELECTRIC COMPANY

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Served via email and First Class Mail April 20, 2026

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