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File #: 214428

April 21, 2026

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

Dear Secretary Homsher:

Attached for filing is the Motion to Compel of PPL Electric Utilities Corporation to compel responses to discovery propounded on Kristine Cardaci (“Complainant”) – Set 1 in the above-referenced proceeding. Copies will be provided as indicated on the Certificate of Service.

Respectfully submitted,



Megan E. Rulli

MER/sa
Attachment

cc: The Honorable Erin L. Gannon (*via email; w/attachment*)
Certificate of Service

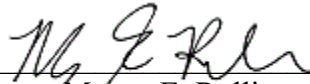
CERTIFICATE OF SERVICE

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: April 21, 2026



Megan E. Rulli

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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

NOTICE TO PLEAD

YOU ARE HEREBY ADVISED THAT, PURSUANT TO 52 PA. CODE § 5.342(g)(1), YOU MAY FILE A REPLY TO THE ENCLOSED MOTION TO COMPEL WITHIN FIVE (5) DAYS AFTER THE DATE OF SERVICE. 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: April 21, 2026

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.	:	

**MOTION OF PPL ELECTRIC UTILITIES CORPORATION TO
COMPEL RESPONSES TO DISCOVERY
PROPOUNDED ON COMPLAINANT – SET I**

TO ADMINISTRATIVE LAW JUDGE ERIN L. GANNON:

Pursuant to 52 Pa. Code §§ 5.342(g) and 5.349(d), PPL Electric Utilities Corporation (“PPL Electric” or the “Company”) hereby files this Motion to Compel Responses to Discovery Propounded on Kristine Cardaci (“Complainant”) – Set I. As described below, the interrogatories propounded by PPL Electric are highly relevant to the issues to be decided in this case. These discovery requests are merely designed to gather more information about the allegations made in the Complaint filed by the Complainant in the above-captioned proceedings, so that the Company can gather information responsive to the allegations made therein. As explained more fully in the Company’s Renewed Motion in Limine, the Complainant has refused PPL Electric access to its meter installed at the service address and, therefore, the Company has been unable to test its meter. The Company served discovery on the Complainant in part to gather evidence to support its position due to the Complainant’s continued refusal to allow PPL Electric to test its meter.

In support of its Motion, PPL Electric states as follows:

I. INTRODUCTION

1. 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.

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

3. 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.

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

5. 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.

6. 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.

7. 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.

8. 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.

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

10. 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.

11. On December 9, 2025, PPL Electric filed a Motion in Limine, requesting that the Complainant be prohibited 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.

12. Also on December 22, 2025, the ALJ issued the Interim Order Converting Hearing into a Prehearing Conference, which converted the hearing scheduled for January 12, 2026, at 10:00 AM to a prehearing conference, held the Company's Motion in Limine in abeyance until the prehearing conference, and stated that the Complainant had until December 29, 2025, to file an Answer to the Company's Motion in Limine. Also on December 22, 2025, a Hearing Type Change Notice was issued, confirming the call-in details for the prehearing conference.

13. The Complainant did not file an Answer to the Company's Motion in Limine.

14. On January 12, 2026, the prehearing conference was held as scheduled. During the prehearing conference, the parties and the ALJ discussed the ongoing dispute regarding a meter test and potential alternatives to having PPL Electric test the meter, including having the Commission test the meter or stipulating to the accuracy of the meter. No agreement was reached upon a meter test at the prehearing conference and the Complainant declined to stipulate to the accuracy of the meter. In addition, the Complainant indicated that she intended to file a motion or introduce an exhibit related to police reports about the meter testing dispute.

15. On February 5, 2026, the ALJ issued the Interim Order on Motions and Scheduling an Evidentiary Hearing, which denied the Company's Motion in Limine without prejudice and set a deadline of February 18, 2026, for the Complainant to file a motion.

16. On February 9, 2026, an Initial Telephonic Hearing Notice was issued, which rescheduled the hearing for March 25, 2026, at 1:00 PM before the ALJ.

17. Also on February 9, 2026, the ALJ issued a Third Prehearing Order for Telephone Hearing, confirming the timing and call-in details for the rescheduled hearing.

18. On February 25, 2026, PPL Electric served Interrogatories and Requests for Production of Documents on the Complainant – Set I, Questions 1 through 11 (“PPL to Complainant Set I”) via first-class mail. A true and correct copy of PPL Electric to Complainant Set I is attached hereto and marked as **Appendix A**.

19. Pursuant to the Commission’s regulations, objections to PPL to Complainant Set I were due on or before March 9, 2026,¹ and responses were due on or before March 17, 2026.

20. The Complainant never served any objections to PPL to Complainant Set I by March 9, 2026.

21. Additionally, the Complainant did not provide any responses to PPL to Complainant Set I by March 17, 2026.

22. On March 17, 2026, the ALJ issued the Interim Order Granting Request for Continuance and Addressing Procedural Matters, which, *inter alia*, granted the Complainant’s requested continuance and canceled the evidentiary hearing scheduled for March 25, 2026.

23. On April 10, 2026, counsel for PPL Electric mailed a letter to the Complainant inquiring into the status of the Complainant’s responses to the discovery requests and asking the Complainant to reply by April 17, 2026, either with the responses or with an alternative proposal for submitting responses. A true and correct copy of the letter sent to the Complainant regarding

¹ The 10-day deadline for serving objections fell on Saturday March 7, 2026, so pursuant to 52 Pa. Code § 1.12, the deadline for serving objections rolled forward to the next business day, *i.e.*, March 9, 2026.

the responses to these discovery requests is attached hereto and marked as **Appendix B**. As of the date of this Motion, the Complainant has not responded to the letter.

24. To date, the Complainant has not provided any responses to PPL to Complainant Set I.

II. MOTION TO COMPEL

25. PPL Electric respectfully requests that the Administrative Law Judge Erin Gannon (the “ALJ”) compel responses to PPL to Complainant Set I.

26. Under 52 Pa. Code § 5.321(c), a party is entitled to obtain discovery of any matter not privileged that is relevant to the pending proceeding, or any matter that is reasonably calculated to lead to the discovery of admissible evidence. Discovery is permitted regardless of whether the information sought “relates to the claim or defense of the party seeking discovery or to the claim or defense of another party.” *Id.*

27. Objections to interrogatories are due within 10 days of the service date. 52 Pa. Code § 5.342(e).

28. Here, PPL Electric served its first set of interrogatories on February 25, 2026, via electronic and first-class mail. Consequently, any objections to PPL to Complainant Set I were due on or before March 9, 2026.

29. The Complainant did not object to any question in PPL to Complainant Set I on or before March 9, 2026.

30. Therefore, the Complainant has waived the right to object to these interrogatories and must provide answers to them. *See* 52 Pa. Code §§ 5.342(a)(4) (stating that a party must “[a]nswer each interrogatory fully and completely unless an objection is made”).

31. Answers to written interrogatories must “[a]nswer each interrogatory fully and completely unless an objection is made.” *Id.* § 5.342(a)(4). Answers must be served within 20 days after service of the interrogatories. *Id.* § 5.342(d).

32. Similarly, a party shall serve a response to a request for documents within 20 days after the service of the request. *Id.* § 5.349(d). The requesting party may move to compel a response to a request for documents with respect to a failure to respond to the request. *See id.*

33. As explained herein, the Complainant has failed to comply with the Commission’s discovery rules by failing to provide any responses to PPL to Complainant Set I or producing the documents sought by these requests.

34. In addition, the interrogatories propounded by PPL Electric are highly relevant to the issues to be decided in this case. Indeed, these interrogatories and requests for production are merely designed to gather more information about the allegations made in the Complaint filed by the Complainant in the above-captioned proceedings, so that the Company can gather information responsive to the allegations made therein. As explained more fully in the Company’s Renewed Motion in Limine, the Complainant has refused PPL Electric access to its meter installed at the service address and, therefore, the Company has been unable to test its meter. The Company served discovery on the Complainant in part to gather evidence to support its position due to the Complainant’s continued refusal to allow PPL Electric to test its meter.

A. PPL TO COMPLAINANT-I-1

35. PPL to Complainant-I-1 requests the following:

- (a) Please explain in detail every claim you are raising or plan to raise against PPL Electric related to the allegations contained in your Formal Complaints.

36. Question 1 simply asks the Complainant to detail all the claims related to the allegations in the Complaint .

37. Here, the Complaint contains numerous allegations related to her service with PPL Electric from December 2024 until January 2025, including allegations that her electric service bills contain incorrect charges. (*See* Complaint ¶ 4.)

38. This basic, foundational question is critical to knowing what issues the Complainant will be raising at the hearing. Without an answer, PPL Electric would not be fully prepared to respond to all of the Complainant’s issues.

39. PPL Electric must receive a full and complete response to this interrogatory in sufficient time before an evidentiary hearing so that the Company can prepare and respond to the Complainant’s allegations.

40. Therefore, the Complainant should be compelled to provide a complete response that provides all of the requested information.

B. PPL to COMPLAINANT-I-2 and I-3

41. PPL to Complainant-I-2 requests the following:

Re: Formal Complaint.

- (a) Please explain in detail the reasons why you are alleging that your electric service bill(s) contain incorrect charges.
- (b) Please identify all bill(s) issued by PPL Electric that you allege contain incorrect charges, including the due date of the bill in question. Please provide all documents relied upon in your response, including copies of the bill(s) in question.
- (c) For each bill identified in I-2(b), please specify the exact amount in dispute, including the exact amount of disputed bill charges in U.S. dollars. Please provide all documents relied upon in your response.
- (d) For each bill identified in I-2(b), please specify the exact amount of disputed electric usage in kilowatt hours (“kWh”). Please provide all documents relied upon in your response.

42. PPL to Complainant-I-3 requests the following:

- (a) Please identify all measures you have taken to investigate the disputed bills identified in your response to Question I-2(b). Please provide all documents relied upon in your response.
- (b) For any investigations identified in your response to subpart (a), please describe in detail the findings of the investigation(s). Please provide all documents relied upon in your response.

43. Paragraph 4 of the Complaint contains allegations related to incorrect charges on the Complainant's electric service bill. (*See* Complaint ¶ 4.) It is unclear from these allegations precisely what charges the Complainant is challenging, when they were discovered, the precise amount of usage or charges in dispute, or the time periods in dispute.

44. Given these allegations, Questions 2 and 3 seek clarification as to the precise nature of the charges the Complainant claims are incorrect. These questions also seek pertinent information regarding any measures taken to investigate the alleged incorrect charges the Complainant has made.

45. These basic questions are critical to responding to and understanding the Complainant's claims regarding the charges issued by PPL Electric. Without answers, PPL Electric and its witnesses would not be fully prepared to respond to all of the Complainant's allegations at the hearing.

46. PPL Electric must receive full and complete responses to these interrogatories in sufficient time before an evidentiary hearing so that the Company can prepare and respond to the Complainant's allegations.

47. Therefore, the Complainant should be compelled to provide complete responses that provide all of the requested information.

C. PPL to COMPLAINANT-I-4

Re: Formal Complaint, Paragraph 4.

- (a) Please identify the heating unit that you state “lost heat” in December 2024.
- (b) Please identify the first date that you claim you lost heat in December 2024.
- (c) What caused the “lost heat”?
- (d) Please identify the date that the heat was restored.
- (e) Was the heating unit repaired? If so, please identify any repairs made, when the repairs were made, who made the repair(s), and provide a brief summary of the repairs performed.
- (f) What is the primary heat source for the Residence?
- (g) Please provide all Documents relied on in responding to subparts (a) through (f).

48. Paragraphs 4 and 5 of the Complaint contain allegations that the Complainant “lost heat” in December 2024. (*See* Complaint ¶¶ 4 and 5.) It is unclear from these allegations precisely what the Complainant means when she says she “lost heat,” what connection that allegation has to her claims of incorrect billing, what caused her to lose heat, when the Complainant discovered she had “lost heat,” the precise date her heat was restored, whether the Complainant was required to take any steps to investigate the cause of her losing heat, and whether repairs were required to her heating unit.

49. Given these allegations, Question 4 seeks clarification as to the precise nature of the “lost heat” that the Complainant claims she is experiencing or has experienced, which the Complainant has placed at issue in these proceedings.

50. These basic questions are relevant to responding to and understanding the Complainant’s claims regarding the loss of heat starting in December 2024. Without answers,

PPL Electric and its witnesses would not be fully prepared to respond to all of the Complainant's allegations at the hearing.

51. PPL Electric must receive full and complete responses to these interrogatories in sufficient time before an evidentiary hearing so that the Company can prepare and respond to the Complainant's allegations.

52. Therefore, the Complainant should be compelled to provide complete responses that provide all of the requested information.

D. PPL to COMPLAINANT-I-5, I-6, I-7, and I-8

53. PPL to Complainant-I-5 requests the following:

- (a) Please identify the square footage of the Residence.
- (b) Please identify the number of floors and rooms in the Residence.
- (c) Please identify the number of bathrooms in the residence.
- (d) Please identify the number of individuals who live at the Residence full-time.
- (e) Please identify the number of individuals who occupy the Residence part-time and state how often they occupy the Residence.
- (f) Please identify the date you moved into the Residence.
- (g) Please identify all other buildings, structures, garages, or outdoor features (for example, a pool) at the property that receive electricity. For each item identified, please state whether it is connected to the same electric meter serving the Residence and list all appliances, heating units, or cooling units that use electricity in that location.

54. PPL to Complainant-I-6 requests the following:

Please identify all appliances (for example, refrigerators, washer/dryers, computers, and televisions) that use electricity in the Residence, including the appliance's make and/or model, the date the item was installed at the Residence, and whether it is plugged in while not in use. Please provide all documents relied upon in your response.

55. PPL to Complainant-I-7 requests the following:

- (a) Please identify all changes to the Residence that have occurred within the past two years that could affect the electric consumption of the Residence.
- (b) For each change identified in subpart (a), please specify the date the change was made. Please provide all documents relied upon in your response.

56. PPL to Complainant-I-8 requests the following:

- (a) Please identify all electrical heating and/or cooling units used by the Residence, including the item's make and/or model and the area(s) of the Residence heated or cooled by each unit. Please provide all documents relied upon in your response.
- (b) Please state the number of space heaters you own. For each space heater you own, please identify the make/model, the frequency of use, and the area(s) of the Residence heated by the space heater.

57. Questions 5, 6, 7, and 8 ask the Complainant to provide information about the Complainant's Residence, *i.e.*, its square footage, number of rooms, number of occupants, when she moved in, a list of appliances that use electricity, changes recently made to the Residence, and electrical heating and/or cooling units used by the Residence.

58. These questions are critical to responding to and understanding the Complainant's claims regarding the alleged incorrect charges on her account. The responses to these questions will clarify what appliances are in use at the service address and their potential electric usage, as well as any changes at the service address that could have impacted the electric consumption at the service address. Without answers, PPL Electric and its witnesses would not be fully prepared to respond to all of the Complainant's allegations at the hearing, especially considering the Complainant has refused the Company access to its meter for testing..

59. PPL Electric is entitled to present evidence related to the Complainant's household size, appliances in place, and other relevant factors related to potential electric consumption, in order to respond to claims that there are incorrect charges on the Complainant's electric service bills.

60. PPL Electric must receive full and complete responses to these interrogatories in sufficient time before an evidentiary hearing so that the Company can prepare and respond to the Complainant's allegations.

61. As a result, the Complainant should be compelled to provide a full and complete response to this interrogatory.

E. PPL TO COMPLAINANT-I-9 through I-11

62. PPL to Complainant-I-9 requests the following:

Please identify each person you plan to call as a fact witness in this proceeding. For each person, please:

- (a) Provide the person's name, home and business address, background, and qualifications;
- (b) Explain in detail the subject matter(s) on which the witness is expected to testify; and
- (c) Provide the source(s) of information relied upon or referenced by the witness.

63. PPL to Complainant-I-10 requests the following:

Please identify each person you plan to call as an expert witness in this proceeding. For each person, please:

- (a) Provide the person's name, home and business address, background, and qualifications;
- (b) Explain in detail the subject matter(s) on which the witness is expected to testify;
- (c) Provide the source(s) of information relied upon or referenced by the witness; and
- (d) Provide a copy of the expert witness's current curriculum vitae.

64. PPL to Complainant-I-11 requests the following:

Please provide copies of all exhibits you intend to present or utilize at the evidentiary hearing in this proceeding. For each exhibit to be used as part of your direct case, please identify the witness who will be sponsoring the exhibit.

65. Questions 9, 10, and 11 ask the Complainant for basic information about the Complainant's case, *i.e.*, that she identify any fact or expert witnesses she plans to call to testify and the exhibits she intends to present at the evidentiary hearing.

66. PPL Electric must know in advance of the hearing who will be testifying on behalf of the Complainant, if anyone, and the subject areas of their testimony.

67. Otherwise, PPL Electric would be denied due process. *See Schneider v. Pa. PUC*, 479 A.2d 10, 15 (Pa. Cmwlth. 1984) (citation omitted) (stating that due process is satisfied when a party is "afforded notice and the opportunity to appear and be heard"); 66 Pa. C.S. § 332(c) (providing that "[e]very party is entitled to present his case or defense by oral or documentary evidence, to submit rebuttal evidence and to conduct such cross-examination as may be required for a full and true disclosure of the facts").

68. PPL Electric is also entitled to discovery of the materials the Complainant intends to present as exhibits before the evidentiary hearing, in order to prepare its own materials in response.

69. The Company is entitled to discovery of such basic and relevant information and documents, and the Complainant should be compelled to respond.

III. SANCTIONS

70. Upon the motion of a party, the presiding officer may make an appropriate order for sanctions if a party fails to answer or otherwise respond to a discovery request or refuses to obey an order of the presiding officer respecting discovery. See 52 Pa. Code § 5.371(a).

71. In ruling upon a motion for sanctions, the presiding officer may, among other things, issue: (1) "[a]n order that the matters regarding which the questions were asked, the character or description of the thing or land, the contents of the paper, or other designated fact shall

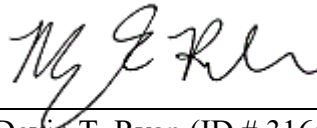
be taken to be established for the purposes of the action in accordance with the claim of the party obtaining the order”; (2) [a]n order refusing to allow the disobedient party to support or oppose designated claims or defenses, or prohibiting the party from introducing in evidence designated documents, things or testimony”; and (3) “[a]n order striking out pleadings or parts thereof, staying further proceedings until the order is obeyed, or entering a judgment against the disobedient party or individual advising the disobedience.” Id. § 5.372(a)(1)-(3).

72. Therefore, to the extent that this Motion is granted and the Complainant fails to answer fully PPL to Complainant Set I, or otherwise comply with the ALJ’s Order, PPL Electric intends to file an appropriate Motion for Sanctions pursuant to 52 Pa. Code §§ 5.371(a) and 5.372(a).

IV. CONCLUSION

For the reasons set forth above, PPL Electric Utilities Corporation respectfully requests that Administrative Law Judge Erin Gannon grant this Motion to Compel Responses to Discovery and direct Complainant to answer PPL Electric to Complainant Set I, as described above, within three (3) days from the date of the order.

Respectfully submitted,



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Date: April 21, 2026

Attorneys for PPL Electric Utilities Corporation

Appendix A

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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

**INTERROGATORIES AND REQUESTS FOR
PRODUCTION OF DOCUMENTS PROPOUNDED BY
PPL ELECTRIC UTILITIES CORPORATION ON
KRISTINE CARDACI – SET I**

Pursuant to 66 Pa.C.S. § 333 and 52 Pa. Code §§ 5.341 *et seq.*, PPL Electric Utilities Corporation (“PPL Electric”) propounds the following Interrogatories and Requests for Production of Documents (hereinafter, “discovery requests”) on Kristine Cardaci (“Complainant”) – Set I.

INSTRUCTIONS AND DEFINITIONS

1. The “Responding Party,” “you,” or “your” means the party to which these discovery requests are propounded and/or all attorneys, agents, affiliates, subsidiaries, employees, consultants, members, constituents, and representatives acting on behalf of the Responding Party.
2. “Commission” means the Pennsylvania Public Utility Commission.
3. To “identify” a natural person means to state that person’s full name, title or position, employer, last known address, and last known telephone number.

4. To “identify” a business entity means to state the full name of such business, the form of the business, and its location or address.

5. To “identify” a “document” means to provide all of the following information irrespective of whether the document is deemed privileged or subject to any claim of privilege:

- a. The title or other means of identification of each such document;
- b. The date of each such document;
- c. The author, preparer or signer of each such document; and
- d. A description of the subject matter of such document sufficient to permit an understanding of its contents and importance to the testimony or position being examined and the present or last known location of the document. The specific nature of the document should also be stated (*e.g.*, letter, business record, memorandum, computer print-out, etc.).

In lieu of “identifying” any document, it shall be deemed a sufficient compliance with these discovery requests to attach a copy of each such document to the answers hereto and reference said document in the particular interrogatory to which the document is responsive.

6. “Document” means the original and all drafts of all written and graphic matter, however produced or reproduced, of any kind or description, whether or not sent or received, and all copies thereof which are different in any way from the original (whether by interlineation, date-stamp, notarization, indication of copies sent or received, or otherwise), including without limitation, any paper, book, account, photograph, blueprint, drawing, sketch, schematic, agreement, contract, memorandum, press release, circular, advertising material, correspondence, letter, telegram, telex, object, report, opinion, investigation, record, transcript, hearing, meeting, study, notation, working paper, summary, intra-office communication, diary, chart, minutes, index sheet, computer software, computer-generated records or files, however stored, check, check stub, delivery ticket, bill of lading, invoice, record or recording or summary of any telephone or other conversation, or of any interview or of any conference, or any other written,

recorded, transcribed, punched, taped, filmed, or graphic matter of which the Responding Party has or has had possession, custody or control, or of which the Responding Party has knowledge.

7. “Communication” means any manner or form of information or message transmission, however produced or reproduced, whether as a document as herein defined, or orally or otherwise, which is made, distributed, or circulated between or among persons, or data storage or processing units.

8. “Date” means the exact day, month, and year, if ascertainable, or if not, the best approximation thereof.

9. Items referred to in the singular include those in the plural, and items referred to in the plural include those in the singular.

10. Items referred to in the masculine include those in the feminine, and items referred to in the feminine include those in the masculine.

11. The answers provided to these discovery requests should first restate the question asked and identify the person(s) supplying the information.

12. In answering these discovery requests, the Responding Party is requested to furnish all information that is available to the Responding Party, including information in the possession of the Responding Party’s attorneys, agents, consultants, or investigators, and not merely such information of the Responding Party’s own knowledge. If any of the discovery requests cannot be answered in full after exercising due diligence to secure the requested information, please so state and answer to the extent possible, specifying the Responding Party’s inability to answer the remainder, and stating whatever information the Responding Party has concerning the unanswered portions. If the Responding Party’s answer is qualified in any particular, please set forth the details of such qualification.

13. If the Responding Party objects to providing any document requested on any ground, identify such document by describing it as set forth in Instruction 5 and state the basis of the objection.

14. If the Responding Party objects to part of a discovery request and refuses to answer that part, state the Responding Party's objection and answer the remaining portion of that discovery request. If the Responding Party objects to the scope or time period of a discovery request and refuses to answer for that scope or time period, state the Responding Party's objection and answer the discovery request for the scope or time period that the Responding Party believes is appropriate.

15. If, in connection with a discovery request, the Responding Party contends that any information, otherwise subject to discovery, is covered by either the attorney-client privilege, the so-called "attorneys' work product doctrine," or any other privilege or doctrine, then specify the general subject matter of the information and the basis to support each such objection.

16. If any information is withheld on grounds of privilege or other protection from disclosure, provide the following information: (a) every person to whom such information has been communicated and from whom such information was learned; (b) the nature and subject matter of the information; and (c) the basis on which the privilege or other protection from disclosure is claimed.

17. As set forth in 52 Pa. Code § 5.342(g), these discovery requests are continuing, and the Responding Party is obliged to change, supplement, and correct all answers given to conform to new or changing information.

18. “Formal Complaint” means the Formal Complaint filed by the Complainant at Docket No. C-2025-3056935.

19. “Residence” means the home where the Complainant receives electric service from PPL Electric listed in the Formal Complaint.

**INTERROGATORIES AND REQUESTS FOR
PRODUCTION OF DOCUMENTS PROPOUNDED ON
KRISTINE CARDACI – SET I**

PPL to Complainant-I-1

Re: Formal Complaint. Please explain in detail every claim you are raising or plan to raise against PPL Electric related to the allegations contained in your Formal Complaint.

PPL to Complainant-I-2

Re: Formal Complaint.

- (a) Please explain in detail the reasons why you are alleging that your electric service bill(s) contain incorrect charges.
- (b) Please identify all bill(s) issued by PPL Electric that you allege contain incorrect charges, including the due date of the bill in question. Please provide all documents relied upon in your response, including copies of the bill(s) in question.
- (c) For each bill identified in I-2(b), please specify the exact amount in dispute, including the exact amount of disputed bill charges in U.S. dollars. Please provide all documents relied upon in your response.
- (d) For each bill identified in I-2(b), please specify the exact amount of disputed electric usage in kilowatt hours (“kWh”). Please provide all documents relied upon in your response.

PPL to Complainant-I-3

- (a) Please identify all measures you have taken to investigate the disputed bills identified in your response to Question I-2(b). Please provide all documents relied upon in your response.
- (b) For any investigations identified in your response to subpart (a), please describe in detail the findings of the investigation(s). Please provide all documents relied upon in your response.

PPL to Complainant-I-4

Re: Formal Complaint, Paragraph 4.

- (a) Please identify the heating unit that you state “lost heat” in December 2024.

- (b) Please identify the first date that you claim you lost heat in December 2024.
- (c) What caused the “lost heat”?
- (d) Please identify the date that the heat was restored.
- (e) Was the heating unit repaired? If so, please identify any repairs made, when the repairs were made, who made the repair(s), and provide a brief summary of the repairs performed.
- (f) What is the primary heat source for the Residence?
- (g) Please provide all Documents relied on in responding to subparts (a) through (f).

PPL to Complainant-I-5

- (a) Please identify the square footage of the Residence.
- (b) Please identify the number of floors and rooms in the Residence.
- (c) Please identify the number of bathrooms in the residence.
- (d) Please identify the number of individuals who live at the Residence full-time.
- (e) Please identify the number of individuals who occupy the Residence part-time and state how often they occupy the Residence.
- (f) Please identify the date you moved into the Residence.
- (g) Please identify all other buildings, structures, garages, or outdoor features (for example, a pool) at the property that receive electricity. For each item identified, please state whether it is connected to the same electric meter serving the Residence and list all appliances, heating units, or cooling units that use electricity in that location.

PPL to Complainant-I-6

Please identify all appliances (for example, refrigerators, washer/dryers, computers, and televisions) that use electricity in the Residence, including the appliance’s make and/or model, the date the item was installed at the Residence, and whether it is plugged in while not in use. Please provide all documents relied upon in your response.

PPL to Complainant-I-7

- (a) Please identify all changes to the Residence that have occurred within the past two years that could affect the electric consumption of the Residence.
- (b) For each change identified in subpart (a), please specify the date the change was made. Please provide all documents relied upon in your response.

PPL to Complainant-I-8

- (a) Please identify all electrical heating and/or cooling units used by the Residence, including the item's make and/or model and the area(s) of the Residence heated or cooled by each unit. Please provide all documents relied upon in your response.
- (b) Please state the number of space heaters you own. For each space heater you own, please identify the make/model, the frequency of use, and the area(s) of the Residence heated by the space heater.

PPL to Complainant-I-9

Please identify each person you plan to call as a fact witness in this proceeding. For each person, please:

- (a) Provide the person's name, home and business address, background, and qualifications;
- (b) Explain in detail the subject matter(s) on which the witness is expected to testify; and
- (c) Provide the source(s) of information relied upon or referenced by the witness.

PPL to Complainant-I-10

Please identify each person you plan to call as an expert witness in this proceeding. For each person, please:

- (a) Provide the person's name, home and business address, background, and qualifications;
- (b) Explain in detail the subject matter(s) on which the witness is expected to testify;
- (c) Provide the source(s) of information relied upon or referenced by the witness; and
- (d) Provide a copy of the expert witness's current curriculum vitae.

PPL to Complainant-I-11

Please provide copies of all exhibits you intend to present or utilize at the evidentiary hearing in this proceeding. For each exhibit to be used as part of your direct case, please identify the witness who will be sponsoring the exhibit.

Appendix B

Megan E. Rulli

mrulli@postschell.com
717-612-6012 Direct
717-731-1985 Direct Fax
File #: 214428

April 10, 2026

VIA FIRST-CLASS MAIL

Kristine Cardaci
122 Lower Deer Lake Court, Emerald Lakes
Long Pond, PA 18334

Re: Kristine Cardaci v. PPL Electric Utilities Corporation
Docket No. C-2025-3056935

Dear Ms. Cardaci:

On February 25, 2026, PPL Electric Utilities Corporation (“PPL” or the “Company”) served Interrogatories and Requests for Production of Documents, Set I on you, via first-class mail. A copy of these discovery requests is attached to this letter. As noted in the original letter serving the discovery requests, under the Public Utility Commission’s regulations, responses were due within 20 days, by March 17, 2026. PPL Electric has not received any responses to any of the discovery requests to date.

Please provide responses to the attached requests to PPL Electric by April 17, 2026, or contact me by April 17, 2026, to arrange a new deadline for the discovery responses. Responses to the discovery requests can be served on PPL Electric via email sent to me at mrulli@postschell.com or via mail sent to me at the address below:

Megan Rulli
17 North Second Street, 12th Floor
Harrisburg, PA 17101-1601

Please be aware that if the Company does not receive any responses or correspondence from you by April 17, 2026, PPL Electric intends to file a Motion to Compel responses to these requests, which will ask the Administrative Law Judge to issue an Order requiring you to respond to the discovery requests. You will have an opportunity to provide an Answer to the Motion to Compel.

If you have any questions, you can contact me using the email or mailing address provided above.

Kristine Cardaci
April 10, 2026
Page 2

Sincerely,

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

Megan E. Rulli

MER
Attachment