

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

DeAurdrea Linika Franczak

Complainant

v.

PPL Electric Utilities Corporation

Respondent

Docket No. C-2025-3055351

**COMPLAINANT’S REPLY TO PPL ELECTRIC UTILITIES CORPORATION’S ANSWER
TO COMPLAINANT’S PETITION TO REOPEN THE RECORD,
OR IN THE ALTERNATIVE, REQUEST FOR LEAVE TO REPLY**

Complainant, DeAurdrea Linika Franczak, appearing pro se, respectfully submits this Reply and states as follows:

I. BACKGROUND AND CONTEXT

1. This matter concerns the limited reopening of the record for the winter billing months of December 2022, January 2023, and February 2023.
2. PPL Exhibits 10 and 11 are PPL-generated records directly tied to the subject account and the specific billing period identified by the Presiding Officer.
3. PPL served these exhibits prior to the hearing and initiated discussion of the estimate-related entry, including representation that its witness could provide explanation of that entry.

II. THE REQUESTED RELIEF IS NARROW AND CONSISTENT WITH THE ALJ'S DIRECTIVE

4. The Presiding Officer specifically reopened the record to examine electric usage during the disputed winter billing period and comparable time periods.

5. PPL Exhibit 10 and Exhibit 11 are the only contemporaneous account-level records produced by the utility that directly address that directive, and no other record evidence before the Commission provides the same account-level detail for that limited period.

6. Complainant is not seeking to expand the record, but rather to complete the evidentiary record consistent with the Presiding Officer's directive.

6A. The standard is not limited to whether evidence existed at the time of the hearing. Good cause exists where necessary to ensure the record is complete and capable of meaningful review, particularly where testimony has already referenced the underlying material.

III. PPL SEEKS TO CREATE A SELECTIVE RECORD

7. PPL cannot have it both ways. PPL served Exhibits 10 and 11, appeared prepared to rely upon those documents, and represented that its witness could explain the estimate-related entry on the record.

8. PPL now seeks to exclude those same documents while offering a post-hearing explanation in its Answer.

9. This results in an evidentiary imbalance where PPL advances characterizations of its records while preventing review of the underlying source material.

9A. PPL's Answer attempts to characterize the estimate-related entry as "generated but not billed." That characterization is not evidence and cannot substitute for the admission of the underlying document itself. The Commission must be permitted to review the source record, rather than rely on post-hearing descriptions offered by counsel.

9B. PPL's position is particularly inconsistent with respect to PPL Exhibit 10, the "Meter Reading History," which is the only document in the record reflecting the estimate-related "Memo" entry for the disputed billing period. PPL introduced this document, initiated testimony regarding it, and represented that its witness could provide explanation of the entry. PPL now seeks to exclude that same document from the evidentiary record.

9C. This sequence raises a clear concern regarding the completeness and reliability of the record. Where a party introduces a document, elicits testimony concerning it, and then seeks to exclude it, the Commission is left without the ability to independently evaluate the underlying data referenced during the hearing. The appropriate remedy is admission of the document so that the record reflects the evidence actually placed at issue.

9D. The Commission should not be asked to rely on testimony referencing a document while the document itself is excluded from review.

IV. PPL EXHIBITS 10 AND 11 ARE UNIQUE ACCOUNT-LEVEL RECORDS

10. PPL Exhibit 10, titled “Meter Reading History,” is a PPL-generated account-level record that identifies the source of meter readings, usage status, billing sequence, billed usage, and the specific entries associated with the subject account.

11. PPL Exhibit 11, titled “Usage Summary,” is a PPL-generated account-level record that summarizes billed days, total kWh used, average kWh per day, electricity costs, and average temperature for the subject account.

12. These exhibits are unique because they are not general policy documents, summaries prepared by Complainant, or outside materials. They are PPL’s own account records for the disputed account and billing period.

13. PPL Exhibit 10 contains an “Estimate” entry dated December 6, 2022, through January 10, 2023, with a “Memo” usage status, during the same winter billing period at issue.

14. PPL Exhibit 11 shows unusually elevated winter usage during that same period, including 2,035 kWh for the January 12, 2023, bill and 3,164 kWh for the February 7, 2023, bill.

15. The relationship between the “Meter Reading History” and the “Usage Summary” is precisely why both documents should be admitted. One document shows the meter-reading source and status, while the other shows the resulting billed usage and charges.

16. Their combined significance cannot be evaluated through counsel’s post-hearing description alone. The Commission should have the source records before it.

17. Notably, the estimate-related entry reflected in PPL Exhibit 10 appears only within the precise winter billing period at issue and does not appear in any other portion of the account records produced. Its isolated occurrence during the disputed timeframe underscores the need for inclusion so that the Commission may evaluate whether the account records for that period are complete, accurate, and internally consistent.

18. The presence of an estimate-related entry during the precise billing period at issue is particularly significant given that estimated billing practices have been the subject of prior regulatory scrutiny. While PPL has maintained that this account was not impacted, the existence of such an entry within the disputed timeframe further supports the need for review of the underlying records rather than reliance on post-hearing characterizations.

V. PREJUDICE TO COMPLAINANT

19. Complainant will be materially prejudiced if these documents are excluded.

20. Without admission of PPL Exhibits 10 and 11, the Commission will be left to evaluate the disputed billing period without the complete account-level records that PPL itself generated and relied upon.

21. This would prevent meaningful examination of the estimate-related entry and its relationship to the billed usage during the winter period at issue.
22. It would further allow PPL to advance explanatory arguments without the underlying documents being subject to scrutiny by the Commission.
23. As the utility and sole custodian of the account records at issue, PPL is uniquely positioned to produce complete and accurate documentation for the disputed billing period. Excluding PPL's own contemporaneous records further deprives the Commission of the only primary source evidence available to evaluate the account.

VI. THE RECORD REFLECTS TESTIMONY WITHOUT THE UNDERLYING DOCUMENT

24. During the hearing, PPL counsel-initiated examination of its witness, April Lewis, regarding the estimate-related entry reflected in proposed Exhibit 10 and represented that the witness could provide explanation of that entry.
25. The Presiding Officer permitted PPL to proceed first in order to create a clean record. Complainant intended to address PPL Exhibits 10 and 11 during her examination because her questions related directly to those documents.
26. During PPL's examination, the witness began answering questions concerning Exhibit 10 before the Presiding Officer stopped the questioning after recognizing that the exhibits had not yet been formally admitted into the record.
27. Complainant did not decline cross-examination because the exhibits lacked importance. Rather, Complainant's questions were tied to PPL Exhibits 10 and 11, and once those exhibits were not admitted, meaningful examination regarding those records was effectively foreclosed.
28. This procedural sequence is important because the current record contains partial testimony concerning Exhibit 10, but does not contain the document necessary for the Commission to evaluate that testimony.
29. That testimony was not stricken from the record and remains part of the evidentiary record.
30. PPL now seeks to prevent admission of the document underlying that testimony.
31. This creates a fundamentally incomplete record in which testimony referencing a document remains, but the document itself is excluded from review.
32. The record presently reflects testimony regarding Exhibit 10, yet omits the document itself, leaving the Commission with an evidentiary gap created during the hearing that prevents meaningful review.

33. The issue before the Presiding Officer is therefore not whether new evidence should be admitted, but whether the evidentiary record should accurately reflect the testimony already permitted.

33A. Admission of the exhibits, or at minimum clear ruling on their exclusion, is necessary so the Commission may understand the precise evidentiary issue preserved by Complainant for further review.

VII. PRESERVATION OF RECORD ISSUE FOR COMMISSION REVIEW

34. Complainant respectfully submits this Reply to ensure the record clearly reflects the basis for her objection to exclusion of PPL Exhibits 10 and 11 and Secondary Exhibit 8.

35. Complainant's position is that exclusion of these documents prevents meaningful review because the exhibits are PPL's own account-level records, relate directly to the billing period identified by the Presiding Officer, and were partially addressed during hearing testimony before formal admission was resolved.

36. Complainant further preserves her position that exclusion of these exhibits materially prejudices her ability to challenge the completeness, accuracy, and reliability of PPL's account records for the disputed billing period.

37. Complainant is not seeking to relitigate the hearing or expand the proceeding. She seeks only a complete record so that the Presiding Officer and, if necessary, the Commission may evaluate the disputed billing period on the same underlying records referenced during the hearing.

VIII. ALTERNATIVE RELIEF

38. In the alternative, if the Presiding Officer determines that additional context is necessary, Complainant does not oppose PPL submitting a limited written explanation accompanying the admission of Exhibits 10 and 11, so that the record remains both complete and properly contextualized.

39. Such an approach ensures that the record remains complete without requiring additional hearing proceedings.

WHEREFORE, Complainant respectfully requests that the Presiding Officer grant the Petition to ensure the evidentiary record accurately reflects the testimony presented and permits meaningful review of the disputed billing period, by reopening the record for the limited purpose of admitting PPL Exhibit 10, PPL Exhibit 11, and Secondary Exhibit 8, or alternatively permitting those exhibits to be admitted with any limited written explanation deemed necessary, and granting such other relief as is just and proper.

/s/ DeAurdrea Linika Franczak

DeAurdrea Linika Franczak

Complainant, pro se

11405 Warwick Pointe Drive, Apt 202

Brandon, FL 33511

Phone: 813.650.5953

Email: deaurdrea0107@yahoo.com

CERTIFICATE OF SERVICE

I hereby certify that on this 4th day of May 2026, a true and correct copy of the foregoing Complainant's Reply was served upon all counsel of record by e-mail as follows:

Served via eService May 4, 2026

PUC Hearing Administrator

F. Joseph Brady

Pennsylvania Public Utility Commission

801 Market Street, 4th Floor, Ste 4063

Philadelphia, PA 19107

Via legal assistant Pamela McNeal – pmcneal@pa.gov

Served via eService May 4, 2026

Counsel for PPL Electric Utilities Corporation Post & Schell, P.C.

Alice Wade, Esquire – alice.wade@postschell.com

Devin T. Ryan, Esquire – dryan@postschell.com

One Oxford Centre, 301 Grant Street, Suite 3010

Pittsburgh, PA 15219

Served via eService May 4, 2026

Megan E. Rulli, Esquire – mrulli@postschell.com

17 North Second Street, 12th Floor

Harrisburg, PA 17101

Served via eService May 4, 2026

Kimberly A. Klock, Esquire – kklock@pplweb.com

Michael J. Shafer, Esquire – mjshafer@pplweb.com

PPL Services Corporation

645 Hamilton Street, Suite 700

Allentown, PA 18101

Served via eService May 4, 2026

/s/ DeAurdrea Linika Franczak

DeAurdrea Linika Franczak

Complainant, pro se

11405 Warwick Pointe Drive, Apt 202

Brandon, FL 33511

Phone: 813.650.5953

Email: deaurdrea0107@yahoo.com