



Todd S. Stewart  
717.703.0806  
[tsstewart@hmslegal.com](mailto:tsstewart@hmslegal.com)

Regulation is a maze. We can show you the way!

---

501 Corporate Circle, Suite 302, Harrisburg, PA 17110 Phone: 717.236.1300 Fax: 717.236.4841 [www.hmslegal.com](http://www.hmslegal.com)

May 4, 2026

**VIA ELECTRONIC FILING**

Matthew L. Homsher  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street  
Harrisburg, PA 17120

RE: Carly Lapiers v. Interstate Gas Supply, LLC; Docket No. C-2025-3059273;  
**PRELIMINARY OBJECTIONS TO AMENDED FORMAL COMPLAINT**

Dear Secretary Homsher:

Enclosed for filing with the Pennsylvania Public Utility Commission is Interstate Gas Supply, LLC d/b/a IGS Energy Preliminary Objections to Amended Formal Complaint of Carly Lapiers in the above-captioned docket. A copy of the Preliminary Objections has been served as indicated on the attached Certificate of Service.

Thank you for your attention to this matter. If you have any questions related to this filing, please do not hesitate to contact my office.

Very truly yours,

A handwritten signature in blue ink, appearing to read "Todd S. Stewart", is written over a large, stylized blue scribble that extends across the signature line.

Todd S. Stewart  
*Counsel for Interstate Gas Supply, LLC  
d/b/a IGS Energy*

TSS/jld  
Enclosure  
cc: Per Certificate of Service

**CERTIFICATE OF SERVICE**

I hereby certify that I have this day served a true copy of the foregoing document upon the parties, listed below, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a party).

**VIA ELECTRONIC MAIL**

Carly Lapiers  
207 Hand Street  
Jessup, PA 18434  
[carlyangeli@gmail.com](mailto:carlyangeli@gmail.com)



---

Todd S. Stewart

DATED: May 4, 2026

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

CARLY LAPIERS,	:	
Complainant,	:	
	:	Docket No. C-2025-3059273
v.	:	
	:	
INTERSTATE GAS SUPPLY, LLC,	:	
Respondent.	:	

---

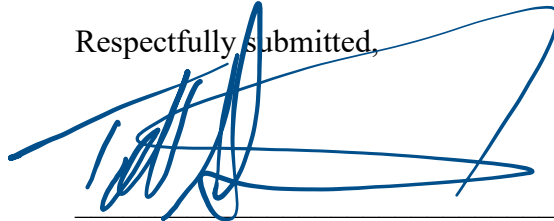
**NOTICE TO PLEAD**

---

TO: Carly Lapiers

Pursuant to 52 Pa. Code §§ 5.101, you are hereby notified that an answer to the enclosed Preliminary Objections, must be filed within ten (10) days from service of this notice, with the Secretary of the Pennsylvania Public Utility Commission, with a copy served on the undersigned counsel for Interstate Gas Supply, LLC d/b/a IGS Energy.

Respectfully submitted,



---

Todd S. Stewart, Attorney ID No. 75556  
HMS Legal LLP  
501 Corporate Circle, Suite 302  
Harrisburg, PA 17110  
(717) 236-1300  
(717) 236-4841 (fax)  
[tsstewart@hmslegal.com](mailto:tsstewart@hmslegal.com)

*Counsel for Interstate Gas Supply, LLC d/b/a  
IGS Energy*

DATED: May 4, 2026

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

CARLY LAPIERS,	:	
Complainant,	:	
	:	Docket No. C-2025-3059273
v.	:	
	:	
INTERSTATE GAS SUPPLY, LLC,	:	
Respondent.	:	

---

**INTERSTATE GAS SUPPLY, LLC D/B/A IGS ENERGY  
PRELIMINARY OBJECTIONS  
TO AMENDED FORMAL COMPLAINT OF CARLY LAPIERS**

---

1. Pursuant to 52 Pa. Code § 5.101, Interstate Gas Supply LLC., d/b/a IGS Energy (“IGS”) hereby submits these Preliminary Objections (“PO’s”) to the Amended Formal Complaint of Carly Lapiers (“Complainant”). This case is about Complainant’s dissatisfaction with the installation of solar panels on the roof of her residence and certain alleged deficiencies in that process, which is ongoing. At bottom there are three interrelated reasons that these PO’s must be sustained and the Complaint dismissed: 1) the Commission’s lack of jurisdiction over the subject matter of the Complaint; 2) the Commission’s lack of jurisdiction over the IGS Party that is the subject of the Complaint; and 3) the failure of the Complainant to plead any facts that establish any violation of any statute over which the Commission has authority, including any regulation or Commission Order, which renders the Complaint legally insufficient.<sup>1</sup>

---

<sup>1</sup> 52 Pa. Code § 5.101(1), (3) & (4).

2. It is well established that the Commission’s preliminary objection practice is similar to Pennsylvania civil practice. Equitable Small Transportation Interveners v. Equitable Gas Company, 1994 Pa. PUC LEXIS 69, PUC Docket No. C-000935435 (July 18, 1994). When considering the preliminary objection, the Commission must determine "whether the law says with certainty, based on well-pleaded factual averments . . . that no recovery or relief is possible. P. J. S. v. Pa. State Ethics Commission, 669 A.2d 1105 (Pa. Cmwlth. 1996). Any doubt must be resolved in favor of the non-moving party by refusing to sustain the preliminary objections. Boyd v. Ward, 802 A.2d 705 (Pa. Cmwlth. 2002)." Dept. of Auditor General, et al. v. State Employees' Retirement System, et al., 836 A.2d 1053, 1064 (Pa. Cmwlth. 2003).

**A. The Commission has no Jurisdiction or Authority to Regulate Respondent.**

3. The Complaint alleges, by its own words, that “this matter involves a residential solar energy system installed at my home at . . . which is interconnected to the electric grid through PPL Electric Utilities.” (Amended Complaint, ¶ 1). What the Amended Complaint and the Complaint fail to allege is that the Respondent (IGS) or its affiliate (IGS Solar) with whom she contracted, is subject to regulation by the Commission for installation of solar systems. Neither is. That the Complaint and Amended Complaint both name IGS as respondent, not IGS Solar, makes this point abundantly clear – IGS Solar is not regulated in any respect by the Commission – so Complainant identified IGS as the respondent because it is subject to Commission jurisdiction, albeit for a very different activity.<sup>2</sup>

4. Nothing in the transaction at issue in the Complaint or Amended Complaint, involves the sale to end users, at retail, of electricity using the jurisdictional facilities of an Electric Distribution Company (“EDC”). In short, nothing in any statute over which the Commission has

---

<sup>2</sup> 66 Pa. C.S. § 2803 (“Electric Generation Supplier”).

jurisdiction grants the Commission the authority to regulate contracts (sellers or installers) for behind the meter installation of electrical equipment. Moreover, nothing in any statute over which the Commission has jurisdiction grants the Commission the authority to supervise or regulate entities that sell, install or maintain solar systems. Nor does Complainant allege in any specific manner that any such authority exists. IGS is an EGS and as such is regulated by the Commission for retail sales of electricity, but nothing else except retail sales of natural gas which are not at issue here.

5. The Commission does not regulate the sale, installation or operation of residential rooftop solar panels. This includes the Commission's regulations implementing the Alternative Energy Portfolio Standards Act, 73 P.S. § 1648.1, et seq. The Commission does regulate size and output limitations of certain customer generators, and ensures compliance with the AEPS Act's strictures, but there is no regulation of sales, installation, or maintenance of solar panels.

**B. There is no allegation of the violation of any Statute, regulation or order and the Commission thus has no authority to address this Complaint.**

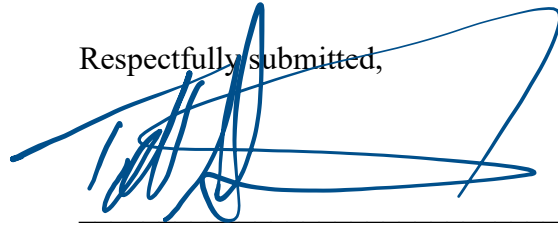
6. The Public Utility Code permits Complaints to be filed setting forth the acts done, or not done, by a public utility in violation of any law, regulation or order over which the Commission has jurisdiction.<sup>3</sup> This provision is fundamental to the Commission's authority to adjudicate claims and yet Complainant alleges no act or omission by any public utility or other entity subject to Commission jurisdiction, that violates any statute, regulation or order. There is no authority for the Commission to adjudicate otherwise. Here, Complainant was given two opportunities to do so and still there is no allegation of any such violation. The Complaint must accordingly be dismissed.

---

<sup>3</sup> 66 Pa. C.S. § 701.

WHEREFORE, Interstate Gas Supply, LLC respectfully requests that the Formal Complaint submitted by Carly Lapiers be dismissed in its entirety because the Commission lacks jurisdiction over the subject matter of the Complaint, and also lacks jurisdiction over IGS Solar, which is not an EGS and which is otherwise not regulated by the Commission; and because the Complaint does not claim any violation of any statute, regulation or order that the Commission is charged with enforcing and thus fails the fundamental test of whether a matter is properly litigated before the Commission. For these reasons and those stated in IGS' other pleadings, the Complaint must be dismissed with prejudice.

Respectfully submitted,



---

Todd S. Stewart, Attorney ID No. 75556  
HMS Legal LLP  
501 Corporate Circle, Suite 302  
Harrisburg, PA 17110  
(717) 236-1300  
(717) 236-4841 (fax)  
[tsstewart@hmslegal.com](mailto:tsstewart@hmslegal.com)

*Counsel for Interstate Gas Supply, LLC  
d/b/a IGS Energy*

DATED: May 4, 2026

**VERIFICATION**

I, Tara McGraw Compliance Manager, IGS Energy LLC hereby that the facts set forth in the foregoing documents are true and correct to the best of my knowledge, information, and belief and that I expect to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa.C.S. § 4904 (relating to unsworn falsification to authorities).

Date: 05/04/2026

Signature: *Tara McGraw*