

**BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Justin Cohen, Complainant v. PPL Electric Utilities Corporation, Respondent

Docket No. C-2026-3061845

**REPLY TO NEW MATTER**

Complainant, Justin Cohen, hereby submits this Reply to the New Matter filed by PPL Electric Utilities Corporation (“Respondent”) and states as follows:

1. Complainant denies each and every allegation contained in Respondent’s New Matter except where expressly admitted.
2. Complainant disputes the accuracy of the billing and denies that the charges were properly calculated. Respondent’s reliance on meter readings and tariff application is insufficient without independent verification.
3. Complainant specifically denies the alleged balance of \$1,581.03 as correct. Respondent has not produced certified meter testing documentation, calibration records, or independent investigative reports that would substantiate the billed amounts.
4. Complainant denies Respondent’s assertion that usage levels are consistent with actual consumption. The billed usage materially exceeds expected demand and does not align with historical consumption patterns or the property’s typical load.
5. Complainant denies Respondent’s characterization of his communications with company representatives. All correspondence was made in good faith to resolve billing irregularities and does not constitute harassment.
6. Complainant objects to Respondent’s attempt to dismiss this matter on procedural grounds by asserting that BECM Holdings LLC must be represented by counsel. Complainant initiated this action and is directly responsible for the account and dispute at issue. This proceeding involves factual billing disputes and consumer protection concerns, and Complainant is capable of responding to the allegations raised.
7. Complainant respectfully requests that the Pennsylvania Public Utility Commission require Respondent to produce all documentation supporting the disputed charges, including but not limited to:
  - o Meter testing results
  - o Calibration reports
  - o Usage logs
  - o Internal investigation records
8. Complainant further requests that no collection or termination actions be permitted while this dispute remains under review.

Respectfully submitted,

  
Justin Cohen

Complainant

