

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

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

Docket No. C-2026-3061842

REPLY TO NEW MATTER

Complainant, Justin Cohen, hereby responds to the New Matter filed by PPL Electric Utilities Corporation (“Respondent”) as follows:

1. Complainant denies each and every allegation contained in Respondent’s New Matter except where expressly admitted.
2. Complainant specifically denies that the charges at issue are accurate, properly calculated, or supported by sufficient verification. Respondent asserts that all charges were based on actual meter readings and account data, but has failed to provide independently verifiable documentation to substantiate these claims.
3. Complainant denies the alleged balance of \$796.64, with \$610.87 past due, as correct. Respondent has not produced certified meter testing results, calibration records, or independent investigation reports that would validate the disputed billing.
4. Complainant denies Respondent’s assertion that consumption levels are consistent with actual usage. No credible evidence has been provided to demonstrate that billed usage materially exceeded historical patterns due to occupancy or equipment conditions.
5. Complainant denies Respondent’s characterization of his communications with company representatives. Any 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