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Sent: Thursday, May 7, 2026 3:31 PM
To: Mohr, Lori; Zarfuss, Kathryn; Berrier, Jennifer L.; Homsher, Matt; Corey, Brittney; Ryan, Devin; Wilburn, Hayley; Connolly, Thomas; Bartolomei, Michelle Lynne; Bayda, Shelbie Frederick; Martin, Christine M
Subject: [External] Request for Commissioner-Level Oversight – Ongoing Concerns Regarding PPL Billing Practices, Verification Procedures, and Regulatory Accountability

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To the Commissioners of the Pennsylvania Public Utility Commission,

I respectfully request commissioner-level oversight regarding multiple active formal complaint proceedings involving PPL Electric Utilities Corporation.

The concerns raised in these proceedings extend beyond isolated billing disputes and reflect broader issues involving utility transparency, verification procedures, account administration, customer treatment, and regulatory accountability.

Across these matters, PPL and its outside counsel, Post & Schell, have repeatedly relied on procedural arguments, generalized denials, and conclusory statements while failing to provide complete supporting documentation necessary to independently verify disputed billing and account activity.

Several consistent patterns have emerged:

- Assertions that charges are unquestionably accurate despite incomplete or unavailable supporting documentation
- Meter testing initiated only after formal complaints were filed
- Reliance on internally controlled testing without independent third-party verification
- Failure to provide independent calibration certifications or supporting technical records
- Repeated attempts to shift focus away from substantive billing concerns toward procedural technicalities
- Inconsistent representations regarding prior communications and complaint history
- Failure to meaningfully address account access, billing transparency, and administrative handling concerns

These concerns are particularly troubling given PPL's recent public history involving widespread billing failures affecting Pennsylvania consumers.

In 2023 and 2024, the Pennsylvania Public Utility Commission investigated widespread billing problems involving PPL that affected hundreds of thousands of customers. Public reporting and Commission materials stated that:

- Approximately 860,000 estimated bills were issued during the affected period

- More than 260,000 customer bills reflected estimates at least 10% above actual usage
- Approximately 48,000 accounts reflected estimates exceeding actual usage by more than 50%
- The PUC approved a settlement requiring substantial corrective action and financial penalties related to these billing issues

Public commentary surrounding these events also raised concerns regarding customer service failures, inability to reach representatives, billing transparency problems, and limited access to accurate historical billing information.

Despite this recent history, PPL's current litigation posture in these proceedings continues to rely heavily on conclusory assurances rather than transparent production of independently verifiable records.

Additionally, a significant concern exists regarding the independence and reliability of the meter testing process itself.

Based on the information currently available, the testing referenced by PPL appears to have been conducted internally by PPL or affiliated personnel rather than through an independent third-party testing entity. To date, no independent calibration certifications, third-party laboratory reports, chain-of-custody materials, or supporting technical verification records have been produced.

Without independent verification, the neutrality and reliability of the testing process itself remain in question. A utility should not be permitted to rely solely on internally controlled testing as conclusive proof while simultaneously withholding complete supporting technical documentation from independent review.

I am also concerned by the repeated attempts to characterize customer communications as "rude" or "troubling" within formal pleadings. These statements are irrelevant to the underlying billing and verification issues and appear designed to shift focus away from substantive utility concerns rather than address them directly.

Post & Schell openly advertises a large Energy & Utilities defense practice representing major electric, gas, pipeline, and utility interests before the Pennsylvania Public Utility Commission and related regulatory bodies. While representation itself is not improper, the Commission should remain mindful that the public interest must remain paramount and independent from the interests of regulated utility companies and their counsel.

Accordingly, I respectfully request that the Commission:

- Ensure these matters are reviewed on their substantive merits
- Require full production of supporting technical and billing documentation
- Require production of all meter testing methodology, calibration, and verification materials
- Determine whether the testing relied upon by PPL satisfies independent reliability standards
- Ensure procedural rules are not being used to avoid substantive review of disputed utility practices
- Closely review the consistency and adequacy of PPL's responses across these related proceedings

Specifically, I request production of:

- Full meter test reports and supporting technical documentation
- Calibration and certification records
- Testing methodology and procedures used
- Identity and qualifications of individuals performing testing
- Chain-of-custody documentation
- Historical maintenance and calibration history for the meters at issue
- Meter read history and underlying usage data
- Complete billing audit trails
- Internal account notes relating to billing concerns, account access, meter accuracy inquiries, and prior complaints
- Any third-party verification or laboratory involvement related to testing

These issues implicate broader concerns involving utility accountability, customer protections, transparency, and public confidence in the regulatory process.

Respectfully,

Justin Cohen