
Emily S. Grecu

egrecu@postschell.com
412-506-6368 Direct
412-227-9065 Direct Fax
File #: 214428

June 5, 2026

VIA ELECTRONIC FILING

Matthew Homsher, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor North
P.O. Box 3265
Harrisburg, PA 17105-3265

**Re: Kristine Cardaci v. PPL Electric Utilities Corporation
Docket No. C-2025-3056935**

Dear Secretary Homsher:

Enclosed for filing is the Motion to Dismiss of PPL Electric Utilities Corporation (“PPL Electric”) for the above-referenced proceeding.

PPL Electric notes that the Complaint indicates that a Protection From Abuse (“PFA”) order has been issued for the Complainant’s personal safety or welfare. Comp. ¶ 6. As such, PPL Electric is electronically filing and serving a redacted Certificate of Service, which redacts the Complainant’s service address. Counsel for PPL Electric hereby certifies that it has served a copy of this Motion to Dismiss upon the Complainant, at the information provided in the unredacted version of the Complaint.

PPL Electric will submit a copy of this cover letter, as well as an unredacted hard copy of the Certificate of Service to the Secretary’s Bureau via first-class mail, to the extent it is required to do so by the Secretary, or the Administrative Law Judge assigned to this matter.

Please direct any questions regarding this submission to the undersigned.

Matthew Homsher, Secretary
June 5, 2026
Page 2

Respectfully Submitted,


Emily S. Grecu

ESG/tjc
Attachment

cc: The Honorable Erin. E. Gannon (*via email; w/attachment*)
Certificate of Service

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been served upon the following persons, in the manner indicated, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

VIA OVERNIGHT FEDERAL EXPRESS

Kristine Cardaci

XXXXX

XXXXX

XXXXX

Date: June 5, 2026



Emily S. Grecu

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Kristine Cardaci,	:	
	:	
Complainant,	:	
	:	
v.	:	Docket No. C-2025-3056935
	:	
PPL Electric Utilities Corporation,	:	
	:	
Respondent.	:	

NOTICE TO PLEAD

YOU ARE HEREBY ADVISED THAT, PURSUANT TO 52 PA. CODE § 5.103(c), ANSWERS TO MOTIONS ARE DUE WITHIN TWENTY (20) DAYS AFTER THE DATE OF SERVICE, UNLESS OTHERWISE DIRECTED BY THE PRESIDING OFFICER. **IN THE INSTANT MOTION, THE COMPANY REQUESTS AN EXPEDITED RESPONSE PERIOD OF FIVE (5) BUSINESS DAYS TO FACILITATE A RULING ON THE MOTION IN SUFFICIENT TIME BEFORE THE HEARING.** YOUR ANSWERS SHOULD BE FILED WITH THE SECRETARY OF THE PENNSYLVANIA PUBLIC UTILITY COMMISSION, P.O. BOX 3265, HARRISBURG, PA 17105-3265. A COPY SHOULD ALSO BE SERVED ON THE UNDERSIGNED COUNSEL.

Kimberly A. Klock (ID # 89716)
Michael J. Shafer (ID # 205681)
PPL Services Corporation
645 Hamilton Street, Suite 700
Allentown, PA 18101
Phone: 610-774-2599
Fax: 610-774-4102
E-mail: kklock@pplweb.com
E-mail: mjshafer@pplweb.com



Devin T. Ryan (ID # 316602)
Emily S. Grecu (ID # 337777)
Post & Schell, P.C.
One Oxford Centre
301 Grant Street, Suite 3010
Pittsburgh, PA 15219
Phone: 717-612-6052
Fax: 717-731-1985
E-mail: dryan@postschell.com
E-mail: egrecu@postschell.com

Megan E. Rulli (ID # 331981)
Post & Schell, P.C.
17 North Second St., 12th Floor
Harrisburg, PA 17101-1601
Phone: 717-612-6012
Fax: 717-731-1985
E-mail: mrulli@postschell.com

Date: June 5, 2026

Attorneys for PPL Electric Utilities Corporation

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Kristine Cardaci,	:	
	:	
Complainant,	:	
	:	
v.	:	Docket No. C-2025-3056935
	:	
PPL Electric Utilities Corporation,	:	
	:	
Respondent.	:	

**MOTION OF PPL ELECTRIC UTILITIES CORPORATION
TO DISMISS THE COMPLAINT OF KRISTINE CARDACI**

TO ADMINISTRATIVE LAW JUDGE ERIN L. GANNON:

Pursuant to 52 Pa. Code §§ 5.371-5.372, PPL Electric Utilities Corporation (“PPL Electric” or the “Company”) hereby files this Motion to Dismiss the Formal Complaint filed by Kristine Cardaci (“Complainant”) in the above-captioned proceeding, due to her failure to comply with the Interim Order Granting Motion of PPL Electric to Compel Responses to Discovery (“Order”) issued by Administrative Law Judge Erin L. Gannon (the “ALJ”) on May 8, 2026. In support of its Motion, PPL Electric states as follows:

I. INTRODUCTION

1. On August 19, 2025, PPL Electric was served with the Formal Complaint filed by the Complainant, alleging that her electric service bill(s) contain incorrect charges.
2. On September 8, 2025, PPL Electric filed its Answer to the Complaint.

3. On September 19, 2025, an Initial Telephonic Hearing Notice was issued, scheduling the hearing for 10:00 AM on November 12, 2025, before the ALJ and providing the call-in details for the telephonic hearing.

4. On September 23, 2025, the ALJ issued a Prehearing Order, confirming the call-in details for the hearing and setting forth various procedural rules.

5. On November 12, 2025, the hearing convened as scheduled. However, when the hearing began, the parties learned that the Complainant's proposed exhibits had not been received by PPL Electric or the ALJ. As such, the hearing was continued to allow time for the Company and the ALJ to receive and review the Complainant's proposed exhibits.

6. On November 12, 2025, a Further Telephonic Hearing Notice was issued, rescheduling the hearing for Tuesday, November 25, 2025, at 9:00 AM before the ALJ.

7. On November 13, 2025, the ALJ issued a Second Prehearing Order for Telephone Hearing, confirming the timing and call-in details for the rescheduled hearing.

8. On or about November 19, 2025, the Complainant contacted the Office of Administrative Law Judge and requested a continuance of the further hearing scheduled for November 25, 2025. PPL Electric did not oppose the continuance.

9. On November 20, 2025, a Cancellation Notice was issued, which canceled the further hearing scheduled for November 25, 2025.

10. On November 21, 2025, a Rescheduled Further Telephonic Hearing Notice was issued, which rescheduled the hearing for Monday, January 12, 2026, at 10:00 AM before the ALJ.

11. On December 9, 2025, PPL Electric filed a Motion in Limine, requesting that the Complainant be prohibited from presenting any testimony and exhibits related to allegations that

her electric service bill(s) contain incorrect charges because she refuses to provide PPL Electric access to its meter for testing.

12. Also on December 22, 2025, the ALJ issued the Interim Order Converting Hearing into a Prehearing Conference, which converted the hearing scheduled for January 12, 2026, at 10:00 AM to a prehearing conference, held the Company's Motion in Limine in abeyance until the prehearing conference, and stated that the Complainant had until December 29, 2025, to file an Answer to the Company's Motion in Limine. Also on December 22, 2025, a Hearing Type Change Notice was issued, confirming the call-in details for the prehearing conference.

13. The Complainant did not file an Answer to the Company's Motion in Limine.

14. On January 12, 2026, the prehearing conference was held as scheduled. During the prehearing conference, the parties and the ALJ discussed the ongoing dispute regarding a meter test and potential alternatives to having PPL Electric test the meter, including having the Commission test the meter or stipulating to the accuracy of the meter. No agreement was reached upon a meter test at the prehearing conference and the Complainant declined to stipulate to the accuracy of the meter. In addition, the Complainant indicated that she intended to file a motion or introduce an exhibit related to police reports about the meter testing dispute.

15. On February 5, 2026, the ALJ issued the Interim Order on Motions and Scheduling an Evidentiary Hearing, which denied the Company's Motion in Limine without prejudice and set a deadline of February 18, 2026, for the Complainant to file a motion.

16. On February 9, 2026, an Initial Telephonic Hearing Notice was issued, which rescheduled the hearing for March 25, 2026, at 1:00 PM before the ALJ.

17. Also on February 9, 2026, the ALJ issued a Third Prehearing Order for Telephone Hearing, confirming the timing and call-in details for the rescheduled hearing.

18. On February 25, 2026, PPL Electric served Interrogatories and Requests for Production of Documents on the Complainant – Set I, Questions 1 through 11 (“PPL to Complainant Set I”) via first-class mail. A true and correct copy of PPL Electric to Complainant Set I is attached hereto and marked as **Appendix A**.

19. Pursuant to the Commission’s regulations, objections to PPL to Complainant Set I were due on or before March 9, 2026,¹ and responses were due on or before March 17, 2026.

20. The Complainant never served any objections to PPL to Complainant Set I by March 9, 2026.

21. Additionally, the Complainant did not provide any responses to PPL to Complainant Set I by March 17, 2026.

22. On March 17, 2026, the ALJ issued the Interim Order Granting Request for Continuance and Addressing Procedural Matters, which, *inter alia*, granted the Complainant’s requested continuance and canceled the evidentiary hearing scheduled for March 25, 2026.

23. On April 10, 2026, counsel for PPL Electric mailed a letter to the Complainant inquiring into the status of the Complainant’s responses to the discovery requests and asking the Complainant to reply by April 17, 2026, either with the responses or with an alternative proposal for submitting responses. A true and correct copy of the letter sent to the Complainant regarding the responses to these discovery requests is attached hereto and marked as **Appendix B**. As of the date of this Motion, the Complainant has not responded to the letter.

24. On April 21, 2026, PPL Electric filed a Motion to Compel to compel responses to discovery propounded on the Complainant – Set I in the above-referenced proceeding.

¹ The 10-day deadline for serving objections fell on Saturday March 7, 2026, so pursuant to 52 Pa. Code § 1.12, the deadline for serving objections rolled forward to the next business day, *i.e.*, March 9, 2026.

25. On April 23, 2026, the ALJ issued an Interim Order on the Company's Renewed Motion in Limine, denying the Company's renewed Motion in Limine.

26. Also on April 23, 2026, a Fourth Prehearing Order for Telephone Hearing was issued, scheduling the hearing for 10:00 AM on May 13, 2026, before the ALJ and providing the call-in details for the telephonic hearing.

27. On May 8, 2026, the ALJ issued an Interim Order Granting Motion of PPL Electric to Compel Responses to Interrogatories and Document Requests. The Interim Order stated that responses are due to the Respondent by May 18, 2026.

28. Also on May 8, 2026, the ALJ issued a second Interim Order Granting Request for Continuance and Addressing Procedural Matters, which granted the Respondent's request for a continuance and cancelled the hearing scheduled for May 13, 2026. The ALJ also issued a Cancellation Notice on May 8, 2026.

29. On May 19, 2026, a Cancelled/Rescheduled Further Telephonic Hearing Notice was issued, which rescheduled the hearing for Wednesday, June 17, 2026, at 10:00 AM before the ALJ.

30. Also on May 19, 2026, a Fifth Prehearing Order for Telephone Hearing was issued, confirming the timing and call-in details for the rescheduled hearing.

31. As of the filing of this Motion, no formal and complete responses to PPL to Complainant Set I have been received. In addition, the Complainant has also failed to produce any documents responsive to the Company's discovery requests.

32. For the reasons explained herein, PPL Electric respectfully requests that the ALJ grant the instant Motion and dismiss the Complainant's Formal Complaint with prejudice, due to

her failure to comply with the ALJ's May 8, 2026, Order granting PPL Electric's Motion to Compel and the Commission's regulations.

II. LEGAL STANDARDS

33. Under 52 Pa. Code § 5.321(c), a party is entitled to obtain discovery of any matter not privileged that is relevant to the pending proceeding, or any matter that is reasonably calculated to lead to the discovery of admissible evidence. Discovery is permitted regardless of whether the information sought "relates to the claim or defense of the party seeking discovery or to the claim or defense of another party." *Id.*

34. Answers to written interrogatories must "[a]nswer each interrogatory fully and completely unless an objection is made." *Id.* § 5.342(a)(4).

35. Upon the motion of a party, the presiding officer may make an appropriate order for sanctions if a party fails to answer or otherwise respond to a discovery request, or refuses to obey an order of the presiding officer respecting discovery. *See* 52 Pa. Code § 5.371(a).

36. Among the potential sanctions, the ALJ may enter:

(1) An order that the matters regarding which the questions were asked, the character or description of the thing or land, the contents of the paper, or other designated fact shall be taken to be established for the purposes of the action in accordance with the claim of the party obtaining the order.

(2) An order refusing to allow the disobedient party to support or oppose designated claims or defenses, or prohibiting the party from introducing in evidence designated documents, things or testimony.

(3) An order striking out pleadings or parts thereof, staying further proceedings until the order is obeyed, or entering a judgment against the disobedient party or individual advising the disobedience.

(4) An order with regard to the failure to make discovery as is just. 52 Pa. Code § 5.372(a)(1)-(4) (emphasis added).

III. MOTION TO DISMISS FOR FAILURE TO COMPLY WITH THE ORDER GRANTING MOTION TO COMPEL

37. PPL Electric respectfully requests that the ALJ grant the instant Motion and dismiss the Complainant's Formal Complaint with prejudice, due to her failure to comply with the ALJ's May 8, 2026, Order Granting Motion to Compel and the Commission's discovery regulations.

38. Here, PPL Electric has propounded straightforward requests for the Complainant to provide information that is very relevant to the issues in this proceeding.

37. Question 1 simply asks the Complainant to detail all the claims related to the allegations in the Complaint she filed.

38. Questions 2 and 3 seek clarification as to the precise nature of the electrical issues the Complainant claims she is experiencing or has experienced, which the Complainant has made the central issue in this proceeding. These questions also seek pertinent information related to any repairs or investigations into these alleged electrical issues that the Complainants have made.

33. Question 4 seeks clarification as to the precise nature of the claim that she "lost heat" in December 2024. This basic question is relevant to responding to and understanding the Complainant's claims regarding the loss of heat starting in December 2024. Without answers, PPL Electric and its witnesses would not be fully prepared to respond to all of the Complainant's allegations at the hearing.

34. Questions 5, 6, 7, and 8 ask the Complainant to provide information about the Complainant's Residence, *i.e.*, its square footage, number of rooms, number of occupants, when she moved in, a list of appliances that use electricity, changes recently made to the Residence, and electrical heating and/or cooling units used by the Residence. These questions are critical to responding to and understanding the Complainant's claims regarding the alleged incorrect charges on her account. The responses to these questions will clarify what appliances are in use at the

service address and their potential electric usage, as well as any changes at the service address that could have impacted the electric consumption at the service address.

39. Questions 9, 10, and 11 ask for basic information about the Complainant's direct case, including that she identify any lay witnesses and expert witnesses she plans to call to testify.

39. By refusing to answer any of these interrogatories fully, even after being directed to do so by the ALJ, the Complainant is denying PPL Electric due process and preventing the full and complete development of the evidentiary record.

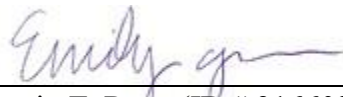
40. Importantly, the Commission has regularly dismissed customer complaints with prejudice due to the complainant's failure to answer discovery in compliance with the presiding administrative law judge's orders granting motions to compel. *See, e.g., Carol Sojda & Carol Lutzkanin v. Metropolitan Edison Co.*, Docket No. C-2017-2638350, pp. 7-8 (Jan. 9, 2019), *adopted*, Docket No. C-2017-2638350 (Order entered Mar. 28, 2019); *Kimberly Beckmann v. Metropolitan Edison Co.*, Docket No. C-2017-2613702, pp. 7-10 (Jan. 31, 2019), *adopted*, Docket No. C-2017-2613702 (Order entered Apr. 11, 2019); *Darlene Stanton v. Pennsylvania Electric Co.*, Docket No. C-2018-3001144, pp. 6-11 (May 10, 2019), *adopted*, Docket No. C-2018-3001144 (Order entered July 11, 2019); *Diana Cook v. West Penn Power Co.*, Docket No. C-2018-3003051, pp. 6-10 (May 1, 2019), *adopted*, Docket No. C-2018-3003051 (Order entered July 11, 2019); *Kyle M. Denlinger v. Duquesne Light Utilities Corp.*, Docket No. C-2018-3005721, pp. 4-11 (Aug. 16, 2019), *adopted*, Docket No. C-2018-3005721 (Order entered Sept. 26, 2019); *Mary Toleno v. Duquesne Light Utilities Corp.*, Docket No. C-2019-3007821, pp. 4-10 (Sept. 23, 2019), *adopted*, Docket No. C-2019-3007821 (Order entered Nov. 7, 2019).

41. Thus, consistent with the Commission's regulations and precedent, PPL Electric respectfully requests that the ALJ grant the instant Motion and dismiss the Complainant's Formal Complaint with prejudice.

IV. CONCLUSION

For the reasons set forth above, PPL Electric Utilities Corporation respectfully requests that Administrative Law Judge Erin L. Gannon grant this Motion and dismiss the Formal Complaint filed by Kristine Cardaci with prejudice. Further, the Company requests that the due date for any Answer to the instant Motion be within five (5) business days of its filing, *i.e.*, by June 12, 2026, considering the hearing is scheduled for June 17, 2026.

Respectfully submitted,



Kimberly A. Klock (ID # 89716)
Michael J. Shafer (ID # 205681)
PPL Services Corporation
645 Hamilton Street, Suite 700
Allentown, PA 18101
Phone: 610-774-2599
Fax: 610-774-4102
E-mail: kklock@pplweb.com
E-mail: mjshafer@pplweb.com

Devin T. Ryan (ID # 316602)
Emily S. Grecu (ID # 337777)
Post & Schell, P.C.
One Oxford Centre
301 Grant Street, Suite 3010
Pittsburgh, PA 15219
Phone: 717-612-6052
Fax: 717-731-1985
E-mail: dryan@postschell.com
E-mail: egrecu@postschell.com

Megan E. Rulli (ID # 331981)
Post & Schell, P.C.
17 North Second St., 12th Floor
Harrisburg, PA 17101-1601
Phone: 717-612-6012
Fax: 717-731-1985
E-mail: mrulli@postschell.com

Date: June 5, 2026

Attorneys for PPL Electric Utilities Corporation

APPENDIX A

Interrogatories and Requests for Production of Documents Propounded by PPL Electric on Complainant – Set I

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Kristine Cardaci,	:	
	:	
Complainant,	:	
	:	
v.	:	Docket No. C-2025-3056935
	:	
PPL Electric Utilities Corporation,	:	
	:	
Respondent.	:	

**INTERROGATORIES AND REQUESTS FOR
PRODUCTION OF DOCUMENTS PROPOUNDED BY
PPL ELECTRIC UTILITIES CORPORATION ON
KRISTINE CARDACI – SET I**

Pursuant to 66 Pa.C.S. § 333 and 52 Pa. Code §§ 5.341 *et seq.*, PPL Electric Utilities Corporation (“PPL Electric”) propounds the following Interrogatories and Requests for Production of Documents (hereinafter, “discovery requests”) on Kristine Cardaci (“Complainant”) – Set I.

INSTRUCTIONS AND DEFINITIONS

1. The “Responding Party,” “you,” or “your” means the party to which these discovery requests are propounded and/or all attorneys, agents, affiliates, subsidiaries, employees, consultants, members, constituents, and representatives acting on behalf of the Responding Party.
2. “Commission” means the Pennsylvania Public Utility Commission.
3. To “identify” a natural person means to state that person’s full name, title or position, employer, last known address, and last known telephone number.

4. To “identify” a business entity means to state the full name of such business, the form of the business, and its location or address.

5. To “identify” a “document” means to provide all of the following information irrespective of whether the document is deemed privileged or subject to any claim of privilege:

- a. The title or other means of identification of each such document;
- b. The date of each such document;
- c. The author, preparer or signer of each such document; and
- d. A description of the subject matter of such document sufficient to permit an understanding of its contents and importance to the testimony or position being examined and the present or last known location of the document. The specific nature of the document should also be stated (*e.g.*, letter, business record, memorandum, computer print-out, etc.).

In lieu of “identifying” any document, it shall be deemed a sufficient compliance with these discovery requests to attach a copy of each such document to the answers hereto and reference said document in the particular interrogatory to which the document is responsive.

6. “Document” means the original and all drafts of all written and graphic matter, however produced or reproduced, of any kind or description, whether or not sent or received, and all copies thereof which are different in any way from the original (whether by interlineation, date-stamp, notarization, indication of copies sent or received, or otherwise), including without limitation, any paper, book, account, photograph, blueprint, drawing, sketch, schematic, agreement, contract, memorandum, press release, circular, advertising material, correspondence, letter, telegram, telex, object, report, opinion, investigation, record, transcript, hearing, meeting, study, notation, working paper, summary, intra-office communication, diary, chart, minutes, index sheet, computer software, computer-generated records or files, however stored, check, check stub, delivery ticket, bill of lading, invoice, record or recording or summary of any telephone or other conversation, or of any interview or of any conference, or any other written,

recorded, transcribed, punched, taped, filmed, or graphic matter of which the Responding Party has or has had possession, custody or control, or of which the Responding Party has knowledge.

7. “Communication” means any manner or form of information or message transmission, however produced or reproduced, whether as a document as herein defined, or orally or otherwise, which is made, distributed, or circulated between or among persons, or data storage or processing units.

8. “Date” means the exact day, month, and year, if ascertainable, or if not, the best approximation thereof.

9. Items referred to in the singular include those in the plural, and items referred to in the plural include those in the singular.

10. Items referred to in the masculine include those in the feminine, and items referred to in the feminine include those in the masculine.

11. The answers provided to these discovery requests should first restate the question asked and identify the person(s) supplying the information.

12. In answering these discovery requests, the Responding Party is requested to furnish all information that is available to the Responding Party, including information in the possession of the Responding Party’s attorneys, agents, consultants, or investigators, and not merely such information of the Responding Party’s own knowledge. If any of the discovery requests cannot be answered in full after exercising due diligence to secure the requested information, please so state and answer to the extent possible, specifying the Responding Party’s inability to answer the remainder, and stating whatever information the Responding Party has concerning the unanswered portions. If the Responding Party’s answer is qualified in any particular, please set forth the details of such qualification.

13. If the Responding Party objects to providing any document requested on any ground, identify such document by describing it as set forth in Instruction 5 and state the basis of the objection.

14. If the Responding Party objects to part of a discovery request and refuses to answer that part, state the Responding Party's objection and answer the remaining portion of that discovery request. If the Responding Party objects to the scope or time period of a discovery request and refuses to answer for that scope or time period, state the Responding Party's objection and answer the discovery request for the scope or time period that the Responding Party believes is appropriate.

15. If, in connection with a discovery request, the Responding Party contends that any information, otherwise subject to discovery, is covered by either the attorney-client privilege, the so-called "attorneys' work product doctrine," or any other privilege or doctrine, then specify the general subject matter of the information and the basis to support each such objection.

16. If any information is withheld on grounds of privilege or other protection from disclosure, provide the following information: (a) every person to whom such information has been communicated and from whom such information was learned; (b) the nature and subject matter of the information; and (c) the basis on which the privilege or other protection from disclosure is claimed.

17. As set forth in 52 Pa. Code § 5.342(g), these discovery requests are continuing, and the Responding Party is obliged to change, supplement, and correct all answers given to conform to new or changing information.

18. “Formal Complaint” means the Formal Complaint filed by the Complainant at Docket No. C-2025-3056935.

19. “Residence” means the home where the Complainant receives electric service from PPL Electric listed in the Formal Complaint.

**INTERROGATORIES AND REQUESTS FOR
PRODUCTION OF DOCUMENTS PROPOUNDED ON
KRISTINE CARDACI – SET I**

PPL to Complainant-I-1

Re: Formal Complaint. Please explain in detail every claim you are raising or plan to raise against PPL Electric related to the allegations contained in your Formal Complaint.

PPL to Complainant-I-2

Re: Formal Complaint.

- (a) Please explain in detail the reasons why you are alleging that your electric service bill(s) contain incorrect charges.
- (b) Please identify all bill(s) issued by PPL Electric that you allege contain incorrect charges, including the due date of the bill in question. Please provide all documents relied upon in your response, including copies of the bill(s) in question.
- (c) For each bill identified in I-2(b), please specify the exact amount in dispute, including the exact amount of disputed bill charges in U.S. dollars. Please provide all documents relied upon in your response.
- (d) For each bill identified in I-2(b), please specify the exact amount of disputed electric usage in kilowatt hours (“kWh”). Please provide all documents relied upon in your response.

PPL to Complainant-I-3

- (a) Please identify all measures you have taken to investigate the disputed bills identified in your response to Question I-2(b). Please provide all documents relied upon in your response.
- (b) For any investigations identified in your response to subpart (a), please describe in detail the findings of the investigation(s). Please provide all documents relied upon in your response.

PPL to Complainant-I-4

Re: Formal Complaint, Paragraph 4.

- (a) Please identify the heating unit that you state “lost heat” in December 2024.

- (b) Please identify the first date that you claim you lost heat in December 2024.
- (c) What caused the “lost heat”?
- (d) Please identify the date that the heat was restored.
- (e) Was the heating unit repaired? If so, please identify any repairs made, when the repairs were made, who made the repair(s), and provide a brief summary of the repairs performed.
- (f) What is the primary heat source for the Residence?
- (g) Please provide all Documents relied on in responding to subparts (a) through (f).

PPL to Complainant-I-5

- (a) Please identify the square footage of the Residence.
- (b) Please identify the number of floors and rooms in the Residence.
- (c) Please identify the number of bathrooms in the residence.
- (d) Please identify the number of individuals who live at the Residence full-time.
- (e) Please identify the number of individuals who occupy the Residence part-time and state how often they occupy the Residence.
- (f) Please identify the date you moved into the Residence.
- (g) Please identify all other buildings, structures, garages, or outdoor features (for example, a pool) at the property that receive electricity. For each item identified, please state whether it is connected to the same electric meter serving the Residence and list all appliances, heating units, or cooling units that use electricity in that location.

PPL to Complainant-I-6

Please identify all appliances (for example, refrigerators, washer/dryers, computers, and televisions) that use electricity in the Residence, including the appliance’s make and/or model, the date the item was installed at the Residence, and whether it is plugged in while not in use. Please provide all documents relied upon in your response.

PPL to Complainant-I-7

- (a) Please identify all changes to the Residence that have occurred within the past two years that could affect the electric consumption of the Residence.
- (b) For each change identified in subpart (a), please specify the date the change was made. Please provide all documents relied upon in your response.

PPL to Complainant-I-8

- (a) Please identify all electrical heating and/or cooling units used by the Residence, including the item's make and/or model and the area(s) of the Residence heated or cooled by each unit. Please provide all documents relied upon in your response.
- (b) Please state the number of space heaters you own. For each space heater you own, please identify the make/model, the frequency of use, and the area(s) of the Residence heated by the space heater.

PPL to Complainant-I-9

Please identify each person you plan to call as a fact witness in this proceeding. For each person, please:

- (a) Provide the person's name, home and business address, background, and qualifications;
- (b) Explain in detail the subject matter(s) on which the witness is expected to testify; and
- (c) Provide the source(s) of information relied upon or referenced by the witness.

PPL to Complainant-I-10

Please identify each person you plan to call as an expert witness in this proceeding. For each person, please:

- (a) Provide the person's name, home and business address, background, and qualifications;
- (b) Explain in detail the subject matter(s) on which the witness is expected to testify;
- (c) Provide the source(s) of information relied upon or referenced by the witness; and
- (d) Provide a copy of the expert witness's current curriculum vitae.

PPL to Complainant-I-11

Please provide copies of all exhibits you intend to present or utilize at the evidentiary hearing in this proceeding. For each exhibit to be used as part of your direct case, please identify the witness who will be sponsoring the exhibit.

APPENDIX B

Correspondence with Complainant Regarding Outstanding Discovery Requests

Megan E. Rulli

mrulli@postschell.com
717-612-6012 Direct
717-731-1985 Direct Fax
File #: 214428

April 10, 2026

VIA FIRST-CLASS MAIL

Kristine Cardaci


Re: Kristine Cardaci v. PPL Electric Utilities Corporation
Docket No. C-2025-3056935

Dear Ms. Cardaci:

On February 25, 2026, PPL Electric Utilities Corporation (“PPL” or the “Company”) served Interrogatories and Requests for Production of Documents, Set I on you, via first-class mail. A copy of these discovery requests is attached to this letter. As noted in the original letter serving the discovery requests, under the Public Utility Commission’s regulations, responses were due within 20 days, by March 17, 2026. PPL Electric has not received any responses to any of the discovery requests to date.

Please provide responses to the attached requests to PPL Electric by April 17, 2026, or contact me by April 17, 2026, to arrange a new deadline for the discovery responses. Responses to the discovery requests can be served on PPL Electric via email sent to me at mrulli@postschell.com or via mail sent to me at the address below:

Megan Rulli
17 North Second Street, 12th Floor
Harrisburg, PA 17101-1601

Please be aware that if the Company does not receive any responses or correspondence from you by April 17, 2026, PPL Electric intends to file a Motion to Compel responses to these requests, which will ask the Administrative Law Judge to issue an Order requiring you to respond to the discovery requests. You will have an opportunity to provide an Answer to the Motion to Compel.

If you have any questions, you can contact me using the email or mailing address provided above.

Kristine Cardaci
April 10, 2026
Page 2

Sincerely,

A handwritten signature in black ink, appearing to read "Megan E. Rulli". The signature is fluid and cursive, with the first name "Megan" being the most prominent part.

Megan E. Rulli

MER
Attachment

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Kristine Cardaci,	:	
	:	
Complainant,	:	
	:	
v.	:	Docket No. C-2025-3056935
	:	
PPL Electric Utilities Corporation,	:	
	:	
Respondent.	:	

**INTERROGATORIES AND REQUESTS FOR
PRODUCTION OF DOCUMENTS PROPOUNDED BY
PPL ELECTRIC UTILITIES CORPORATION ON
KRISTINE CARDACI – SET I**

Pursuant to 66 Pa.C.S. § 333 and 52 Pa. Code §§ 5.341 *et seq.*, PPL Electric Utilities Corporation (“PPL Electric”) propounds the following Interrogatories and Requests for Production of Documents (hereinafter, “discovery requests”) on Kristine Cardaci (“Complainant”) – Set I.

INSTRUCTIONS AND DEFINITIONS

1. The “Responding Party,” “you,” or “your” means the party to which these discovery requests are propounded and/or all attorneys, agents, affiliates, subsidiaries, employees, consultants, members, constituents, and representatives acting on behalf of the Responding Party.
2. “Commission” means the Pennsylvania Public Utility Commission.
3. To “identify” a natural person means to state that person’s full name, title or position, employer, last known address, and last known telephone number.

4. To “identify” a business entity means to state the full name of such business, the form of the business, and its location or address.

5. To “identify” a “document” means to provide all of the following information irrespective of whether the document is deemed privileged or subject to any claim of privilege:

- a. The title or other means of identification of each such document;
- b. The date of each such document;
- c. The author, preparer or signer of each such document; and
- d. A description of the subject matter of such document sufficient to permit an understanding of its contents and importance to the testimony or position being examined and the present or last known location of the document. The specific nature of the document should also be stated (*e.g.*, letter, business record, memorandum, computer print-out, etc.).

In lieu of “identifying” any document, it shall be deemed a sufficient compliance with these discovery requests to attach a copy of each such document to the answers hereto and reference said document in the particular interrogatory to which the document is responsive.

6. “Document” means the original and all drafts of all written and graphic matter, however produced or reproduced, of any kind or description, whether or not sent or received, and all copies thereof which are different in any way from the original (whether by interlineation, date-stamp, notarization, indication of copies sent or received, or otherwise), including without limitation, any paper, book, account, photograph, blueprint, drawing, sketch, schematic, agreement, contract, memorandum, press release, circular, advertising material, correspondence, letter, telegram, telex, object, report, opinion, investigation, record, transcript, hearing, meeting, study, notation, working paper, summary, intra-office communication, diary, chart, minutes, index sheet, computer software, computer-generated records or files, however stored, check, check stub, delivery ticket, bill of lading, invoice, record or recording or summary of any telephone or other conversation, or of any interview or of any conference, or any other written,

recorded, transcribed, punched, taped, filmed, or graphic matter of which the Responding Party has or has had possession, custody or control, or of which the Responding Party has knowledge.

7. “Communication” means any manner or form of information or message transmission, however produced or reproduced, whether as a document as herein defined, or orally or otherwise, which is made, distributed, or circulated between or among persons, or data storage or processing units.

8. “Date” means the exact day, month, and year, if ascertainable, or if not, the best approximation thereof.

9. Items referred to in the singular include those in the plural, and items referred to in the plural include those in the singular.

10. Items referred to in the masculine include those in the feminine, and items referred to in the feminine include those in the masculine.

11. The answers provided to these discovery requests should first restate the question asked and identify the person(s) supplying the information.

12. In answering these discovery requests, the Responding Party is requested to furnish all information that is available to the Responding Party, including information in the possession of the Responding Party’s attorneys, agents, consultants, or investigators, and not merely such information of the Responding Party’s own knowledge. If any of the discovery requests cannot be answered in full after exercising due diligence to secure the requested information, please so state and answer to the extent possible, specifying the Responding Party’s inability to answer the remainder, and stating whatever information the Responding Party has concerning the unanswered portions. If the Responding Party’s answer is qualified in any particular, please set forth the details of such qualification.

13. If the Responding Party objects to providing any document requested on any ground, identify such document by describing it as set forth in Instruction 5 and state the basis of the objection.

14. If the Responding Party objects to part of a discovery request and refuses to answer that part, state the Responding Party's objection and answer the remaining portion of that discovery request. If the Responding Party objects to the scope or time period of a discovery request and refuses to answer for that scope or time period, state the Responding Party's objection and answer the discovery request for the scope or time period that the Responding Party believes is appropriate.

15. If, in connection with a discovery request, the Responding Party contends that any information, otherwise subject to discovery, is covered by either the attorney-client privilege, the so-called "attorneys' work product doctrine," or any other privilege or doctrine, then specify the general subject matter of the information and the basis to support each such objection.

16. If any information is withheld on grounds of privilege or other protection from disclosure, provide the following information: (a) every person to whom such information has been communicated and from whom such information was learned; (b) the nature and subject matter of the information; and (c) the basis on which the privilege or other protection from disclosure is claimed.

17. As set forth in 52 Pa. Code § 5.342(g), these discovery requests are continuing, and the Responding Party is obliged to change, supplement, and correct all answers given to conform to new or changing information.

18. “Formal Complaint” means the Formal Complaint filed by the Complainant at Docket No. C-2025-3056935.

19. “Residence” means the home where the Complainant receives electric service from PPL Electric listed in the Formal Complaint.

**INTERROGATORIES AND REQUESTS FOR
PRODUCTION OF DOCUMENTS PROPOUNDED ON
KRISTINE CARDACI – SET I**

PPL to Complainant-I-1

Re: Formal Complaint. Please explain in detail every claim you are raising or plan to raise against PPL Electric related to the allegations contained in your Formal Complaint.

PPL to Complainant-I-2

Re: Formal Complaint.

- (a) Please explain in detail the reasons why you are alleging that your electric service bill(s) contain incorrect charges.
- (b) Please identify all bill(s) issued by PPL Electric that you allege contain incorrect charges, including the due date of the bill in question. Please provide all documents relied upon in your response, including copies of the bill(s) in question.
- (c) For each bill identified in I-2(b), please specify the exact amount in dispute, including the exact amount of disputed bill charges in U.S. dollars. Please provide all documents relied upon in your response.
- (d) For each bill identified in I-2(b), please specify the exact amount of disputed electric usage in kilowatt hours (“kWh”). Please provide all documents relied upon in your response.

PPL to Complainant-I-3

- (a) Please identify all measures you have taken to investigate the disputed bills identified in your response to Question I-2(b). Please provide all documents relied upon in your response.
- (b) For any investigations identified in your response to subpart (a), please describe in detail the findings of the investigation(s). Please provide all documents relied upon in your response.

PPL to Complainant-I-4

Re: Formal Complaint, Paragraph 4.

- (a) Please identify the heating unit that you state “lost heat” in December 2024.

- (b) Please identify the first date that you claim you lost heat in December 2024.
- (c) What caused the “lost heat”?
- (d) Please identify the date that the heat was restored.
- (e) Was the heating unit repaired? If so, please identify any repairs made, when the repairs were made, who made the repair(s), and provide a brief summary of the repairs performed.
- (f) What is the primary heat source for the Residence?
- (g) Please provide all Documents relied on in responding to subparts (a) through (f).

PPL to Complainant-I-5

- (a) Please identify the square footage of the Residence.
- (b) Please identify the number of floors and rooms in the Residence.
- (c) Please identify the number of bathrooms in the residence.
- (d) Please identify the number of individuals who live at the Residence full-time.
- (e) Please identify the number of individuals who occupy the Residence part-time and state how often they occupy the Residence.
- (f) Please identify the date you moved into the Residence.
- (g) Please identify all other buildings, structures, garages, or outdoor features (for example, a pool) at the property that receive electricity. For each item identified, please state whether it is connected to the same electric meter serving the Residence and list all appliances, heating units, or cooling units that use electricity in that location.

PPL to Complainant-I-6

Please identify all appliances (for example, refrigerators, washer/dryers, computers, and televisions) that use electricity in the Residence, including the appliance’s make and/or model, the date the item was installed at the Residence, and whether it is plugged in while not in use. Please provide all documents relied upon in your response.

PPL to Complainant-I-7

- (a) Please identify all changes to the Residence that have occurred within the past two years that could affect the electric consumption of the Residence.
- (b) For each change identified in subpart (a), please specify the date the change was made. Please provide all documents relied upon in your response.

PPL to Complainant-I-8

- (a) Please identify all electrical heating and/or cooling units used by the Residence, including the item's make and/or model and the area(s) of the Residence heated or cooled by each unit. Please provide all documents relied upon in your response.
- (b) Please state the number of space heaters you own. For each space heater you own, please identify the make/model, the frequency of use, and the area(s) of the Residence heated by the space heater.

PPL to Complainant-I-9

Please identify each person you plan to call as a fact witness in this proceeding. For each person, please:

- (a) Provide the person's name, home and business address, background, and qualifications;
- (b) Explain in detail the subject matter(s) on which the witness is expected to testify; and
- (c) Provide the source(s) of information relied upon or referenced by the witness.

PPL to Complainant-I-10

Please identify each person you plan to call as an expert witness in this proceeding. For each person, please:

- (a) Provide the person's name, home and business address, background, and qualifications;
- (b) Explain in detail the subject matter(s) on which the witness is expected to testify;
- (c) Provide the source(s) of information relied upon or referenced by the witness; and
- (d) Provide a copy of the expert witness's current curriculum vitae.

PPL to Complainant-I-11

Please provide copies of all exhibits you intend to present or utilize at the evidentiary hearing in this proceeding. For each exhibit to be used as part of your direct case, please identify the witness who will be sponsoring the exhibit.

Megan E. Rulli

mrulli@postschell.com
717-612-6012 Direct
717-731-1985 Direct Fax
File #: 214428

February 25, 2026

VIA FIRST-CLASS MAIL

Kristine Cardaci
XXXX
XXXX

Re: Kristine Cardaci v. PPL Electric Utilities Corporation
Docket No. C-2025-3056935

Dear Ms. Cardaci:

Attached are the Interrogatories and Requests for Production of Documents propounded by PPL Electric Utilities Corporation (“PPL” or the “Company”), Set I on Kristine Cardaci in the above-referenced proceedings.

Please provide answers to the enclosed discovery requests within twenty (20) days of the date of service, pursuant to 52 Pa. Code § 5.342.

PPL Electric notes that the Complaint indicates that a Protection From Abuse (“PFA”) order has been issued for the Complainant’s personal safety or welfare. Comp. ¶ 6. As such, PPL Electric is electronically filing and serving a redacted Certificate of Service, which redacts the Complainant’s service address. Counsel for PPL Electric hereby certifies that it has served a copy of these Interrogatories and Requests for Production of Documents upon the Complainant, at the information provided in the unredacted version of the Complaint.

Copies are being provided as indicated on the Certificate of Service.

Respectfully submitted,



Megan E. Rulli

MER/dmc
Attachment

Kristine Cardaci
February 25, 2026
Page 2

cc: Matthew Homsher, Secretary (*Filing Letter and Certificate of Service only*)
Certificate of Service

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been served upon the following persons, in the manner indicated, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

VIA FIRST-CLASS MAIL

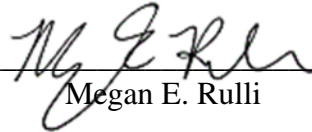
Kristine Cardaci

XXXXX

XXXXX

XXXXX

Date: February 25, 2026



Megan E. Rulli