To File
R-2025-3057154
ORIGINAL

**Before the**

**Pennsylvania Public Utility Commission**

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|---|---|
| Pennsylvania Public Utility Commission | : Docket No. |
| v. PPL Electric Utilities Corporation | : R-2025 3057154 |

December 2, 2025

Interrogatories, Set 3
Eric Joseph Epstein, Pro se

DATE OF DEPOSIT

DEC 02 2025

PA Public Utility Commission
Secretary's Bureau

Devin T. Ryan, Esq. Kimberly A. Klock, Esq.
Alice A. Wade, Esq. Michael J. Shafer, Esq.
Hayley E. Wilburn, Esq. PPL Services Corporation
David B. MacGregor, Esq.
Garret P. Lent, Esq.
Anthony C. DeCusatis, Esq.
Erin R. Kawa, Esq.
Post & Schell, P.C.

December 2, 2025

Enclosed please find an original copy of Eric Epstein's Interrogatories, Set 3 in the above-referenced proceeding. Copies of these Interrogatories will be mailed via the United States Postal Service to all parties identified in the most recent Certificate of Service.

Sincerely,

Eric Joseph Epstein Pro se
4100 Hillsdale Road
Harrisburg, PA 17112
(717)-635-8615

**Instructions**

**a)** These Interrogatories shall be deemed to be continuing. The Respondent is obliged to change, supplement, and correct all answers to Interrogatories to conform to available information, including such information as first becomes available to the Respondent after the answers hereto are filed;

**b)** The answers provided should first restate the question asked and identify the person(s) supplying the information;

**c)** All information is to be divulged that is within the knowledge, possession, control or custody of the Respondent or may be reasonably ascertained thereby. The term "PPL," "the Company," or "PPL Electric Utilities Corporation," as used herein, includes: PPL Electric Utilities Corporation, its attorneys, agents, employees, or other representatives, and predecessor or successor attorneys, agents, employees, or other representatives; and,

**d)** As used herein the terms "document(s)" or "work paper(s)" include, but are not limited to, the original and all copies (regardless of origin and whether or not including additional writing therein or attached thereto) of memoranda, reports, books, manuals, instructions, directives, records, forms, notes, letters, notices, confirmations, telegrams, pamphlets, notations of any sort concerning conversations, telephone calls, meetings or other communications, bulletins, transcripts, diaries, analyses, summaries, correspondence and enclosures, circulars, opinions, studies, investigations, questionnaires and surveys, worksheets, and all drafts, preliminary versions, alterations, modifications, revisions, changes, amendments and written comments concerning the foregoing, in whatever form, stored or contained in or on whatever medium including computerized memory or magnetic media.

**E.E. Set-3, Requests 1a, 1b, and 1c.**

Please provide the cost of legal services billed by Post and Schell and **approved** by PPL for administrative costs, food and lodging, parking, legal fees, and transportation, relating to the following Distribution cases:

1a) Pennsylvania Public Utility Commission v. PPL Electric Utilities Corporation, Docket No. R-2010-2161694.

1b) Pennsylvania Public Utility Commission v. PPL Electric Utilities Corporation Supplement No. 118 to Tariff - Electric Pa. P.U.C. No. 201, Docket No. R-2012-229057.

1c) Pennsylvania Public Utility Commission v. PPL Electric Utilities Corporation, Docket No. R-2015-2469275.

**E.E. Set-3, Requests 2a, 2b, and 2c.**

Please provide the cost of legal services billed by Post and Schell and **not approved** by PPL for administrative costs, food and lodging, parking, legal fees and transportation, relating to the following Distribution cases.

2a) Pennsylvania Public Utility Commission v. PPL Electric Utilities Corporation, Docket No. R-2010-2161694.

2b) Pennsylvania Public Utility Commission v. PPL Electric Utilities Corporation Supplement No. 118 to Tariff - Electric Pa. P.U.C. No. 201, Docket No. R-2012-229057.

2c) Pennsylvania Public Utility Commission v. PPL Electric Utilities Corporation, Docket No. R-2015-2469275.

**E.E. Set-3, Requests 3a, 3b, and 3c.**

Please provide the "evaluation" PPL used to determine a "firm's effectiveness in representing the Company and the reasonableness of its costs."

3a) Please provide the "evaluation" PPL used to determine a "[law] firm's effectiveness in representing the Company and the reasonableness of its costs" in PPL Electric Utilities Corporation, Docket No. R-2010-2161694.

3b) Please provide the "evaluation" PPL used to determine a "[law] firm's effectiveness in representing the Company and the reasonableness of its costs" in Pennsylvania Public Utility Commission v. PPL Electric Utilities Corporation Supplement No. 118 to Tariff - Electric Pa. P.U.C. No. 201, Docket No. R-2012-229057.

3c) Please provide the "evaluation" PPL used to determine a "[law] firm's effectiveness in representing

the Company and the reasonableness of its costs"
in PPL Electric Utilities Corporation, Supplement No. 118
to Tariff - Electric Pa. P.U.C. No. 201,
Docket No. R-2015-2469275.

**E.E. Set -3, Requests 4a, 4b, and 4c.**

4a) Please provide each firm, contract and amount awarded by PPL - and underwritten by rate payers - to lobby, market, and provide public relations to PPL Electric Utilities Corporation Supplement No. 118 to Tariff – Electric Pa. Docket No. R-2010-2161694.

4b) Please disclose each firm, contract and underwritten by rate payers to lobby, market, and provide public relations to PPL Electric Utilities Corporation Supplement No. 118 to Tariff - Electric Pa. P.U.C. No. 201, Docket No. R-2012-229057.

4c) Please provide each firm, contract and amount awarded by PPL - and underwritten by rate payers - to lobby, market, and provide public relations PPL Electric Utilities Corporation Supplement No. 118 to Tariff – Electric Pa. P.U.C. No. 201, Docket No. R-2015-2469275.

**E.E. Set-3, Requests 5a, 5b, 5c, and 5d.**

On August 9 2010 PPL's witness Joseph Kleha, Manager of Regulatory Compliance and Rates, stated under cross examination from Mr. Epstein that the Company conducted, "No due diligence" when retaining Post and Schell for legal services.

5a) Please provide the Company's policy that describes and justifies selecting outside legal counsel without conducting due diligence.

Please identify all contracts and contractors relating to the Distribution cases listed below where PPL applied the same "standards" of not conducting due diligence when selecting a vendor.

5b) Pennsylvania Public Utility Commission v. PPL Electric Utilities Corporation, Docket No. R-2010-2161694.

5c) Utility Commission v. PPL Electric Utilities Corporation Supplement No. 118 to Tariff - Electric

Pa. P.U.C. No. 201, Docket No. R-2012-229057.

5d) Pennsylvania Public Utility Commission v. PPL Electric Utilities Corporation Supplement No. 118 to Tariff - Electric Pa. P.U.C. No. 201, Docket No. R-2015-2469275.

**E.E.-Set 3, Requests 6a, 6b, 6c,6d, 6e,6f,6g, and 6h.**

Mr. Kleha was asked, "Do you recall stating on Monday August 9, 2010, during Cross Examination, 'I get the best counsel money can buy?'" Mr. Kleha answered affirmatively, and said rate payers have to take it as an "act of faith" that their money is being spent efficiently and in their best interest." On August 9 2010, PPL's witness Joseph Kleha stated under cross examination from Mr. Epstein that the Company conducted, "No due diligence when retaining Post and Schell for legal services."

Please provide a detailed list of all contracts based on an "act of faith" in the cases listed below.

6a) Pennsylvania Public Utility Commission v. PPL Electric Utilities Corporation, Docket No. R-2010-2161694.

6b) Utility Commission v. PPL Electric Utilities Corporation Supplement No. 118 to Tariff - Electric Pa. P.U.C. No. 201, Docket No. R-2012-229057.

6c) Pennsylvania Public Utility Commission v. PPL Electric Utilities Corporation Supplement No. 118 to Tariff - Electric Pa. P.U.C. No. 201, Docket No. R-2015-2469275.

Please provide the RFP the Company issued to retain counsel in the cases listed below.

6d) Pennsylvania Public Utility Commission v. PPL Electric Utilities Corporation, Docket No. R-2010-2161694.

6e) Public Utility Commission v. PPL Electric Utilities Corporation Supplement No. 118 to Tariff – Electric Pa. P.U.C. No. 201, Docket No. R-2012-229057.

6f) Pennsylvania Public Utility Commission v. PPL Electric Utilities Corporation Supplement No. 118 to Tariff - Electric Pa. P.U.C. No. 201, Docket No. R-2015-2469275.

6g) Please provide copies of all directives, instructions, and polices that codify PPL's protocol

to secure "the best counsel money can buy."

6h) Please provide all data, metrics, and studies that PPL uses to establish that the amount of the payment for legal services results in better results.

**E.E.-Set 3, Requests 7a, 7b, and 7c.**

Please list all other contracts and contractors PPL has procured in relation to the following Distribution cases based on the Company's criteria of procuring the best services money can buy.

7a) Pennsylvania Public Utility Commission v. PPL Electric Utilities Corporation, Docket No. R-2010-2161694.

7b) Pennsylvania Public Utility Commission v. PPL Electric Utilities Corporation Supplement No. 118 to Tariff - Electric Pa. P.U.C. No. 201, Docket No. R-2012-229057.

7c) Pennsylvania Public Utility Commission v. PPL Electric Utilities Corporation Supplement No. 118 to Tariff - Electric Pa. P.U.C. No. 201, Docket No. R-2015-2469275.

**E.E.-Set 3, Requests 8a, 8b, 8c, and 8d.**

8a) Please describe an "act of faith" as a measurement tool.

Please identify all contracts and contractors relating to the Distribution cases listed below where PPL applied the same "standard" of evaluating performance "based on an act of faith."

8b) Pennsylvania Public Utility Commission v. PPL Electric Utilities Corporation, Docket No. R-2010-2161694.

8c) Utility Commission v. PPL Electric Utilities Corporation Supplement No. 118 to Tariff –

Electric Pa. P.U.C. No. 201, Docket No. R-2012-229057.

8d) Pennsylvania Public Utility Commission v. PPL Electric Utilities Corporation Supplement No. 118 to Tariff - Electric Pa. P.U.C. No. 201, Docket No. R-2015-2469275.

Respectfully submitted,

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I hereby certify that a true and correct copy of this filing 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).

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Dated: December 2, 2025 _____

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