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August 25, 2015

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
P.O. Box 3265
Harrisburg, PA 17105-3265

RE: Timothy and Susan Smith v PPL Electric Utilities Corporation
Docket No: F-2015-2475535

Dear Ms. Chiavetta:

Enclosed for eFiling in the above-captioned matter are the Replies on behalf of PPL Electric Utilities Corporation, to Complainant's Exceptions.

Please note that this filing was eFiled with the Commission on the date indicated above.

Very truly yours,

KIMBERLY G. KRUPKA

KGK/ejm
Enclosure

cc: Timothy & Susan Smith (w/ enc.)
Administrative Law Judge David A. Salapa (w/enc.) via email only
Amy M. Bellizia (w/enc.) via email only

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BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

TIMOTHY AND SUSAN SMITH,

Complainant,

vs.

PPL ELECTRIC UTILITIES CORPORATION,

Respondent.

COMPLAINT DOCKET

NO. F-2015-2475535

**PPL ELECTRIC UTILITIES CORPORATION'S REPLIES
TO EXCEPTIONS OF COMPLAINANTS, TIMOTHY AND SUSAN SMITH**

AND NOW, comes the Respondent, PPL Electric Utilities Corporation ("PPL Electric") by and through its attorney of record, Gross McGinley, LLP, and files the within Replies to Exceptions, alleging in support thereof as follows:

1. Denied.¹ Complainants fail to set forth their Exceptions in numbered paragraphs and further fail to identify with particularity any Conclusions of Law to which they except. Nonetheless, it appears that Complainants except to Page 17 of the Initial Decision of the Administrative Law Judge and PPL Electric will respond accordingly.

2. Denied. Complainants appear to except from the Initial Decision based on their contention that Complainants' electric bills increased by 150% in January, February and March 2014. In January, February and March, 2014, Complainants used 4769, 5340, and 5054 kWh, respectively. (See PPL Hearing Exhibit No. 1). Despite receiving monthly bills, Complainant did not contact PPL Electric to question the charges until May 22, 2014. (N.T. 9-10, 33, PPL Hearing Exhibit No. 2 and FOF No. 12). The delay prevented PPL Electric from performing an

¹ Complainant fails to set forth his Exceptions in numbered paragraphs. However, it appears that Complainant is excepting to finding of fact 4, 8, 11, 14, 15, and 16, and accordingly, PPL Electric replies to the same.

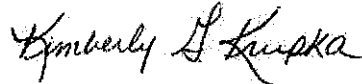
investigation when the allegedly high bills were occurring. However, PPL Electric did perform a high bill investigation and a meter test on June 20, 2014. The meter at this time tested to an accuracy of 99.95. During this investigation, it was determined that Complainants had the potential to utilize approximately 4936 kWh per month, attributable to just the heat pumps, propane blower, four fans, and a dehumidifier. (Other potential uses, such as lights, were not included within this calculation). (PPL Hearing Exhibit No. 2) However, Complainants remained concerned and PPL Electric thereafter performed a shop test of the meter to confirm accuracy. The meter was removed on April 13, 2015 and tested at a certified facility. The meter report indicates the meter tested to an accuracy of 99.9%. (PPL Hearing Exhibit No. 5). What is clear is that the meter at the home was working accurately. Moreover, Complainants had the potential to utilize the electric for which they were billed. Based on Complainants' heat source and the fluctuations of temperature, the ALJ properly found that Complainants failed to meet their burden.

3. Denied. Complainants appear to contend that the ALJ ordered an improper payment arrangement. However, such arrangement was based on the disclosed earnings of Complainants. The ALJ properly found, that based on Complainants' own testimony, that Complainants have a gross monthly household income of \$7005. Ms. Smith testified that she receives monthly disability of \$2386. She further testified that her husband, Mr. Smith, receives \$686 per week and that her adult son whom resides in the household receives \$300-\$400 per week. Even calculating the son's income at \$300 per week, this results in a household monthly income of \$6658. Alternatively, if the son earns \$400 per week, this results in a household monthly income of \$7092. Based on a household size of three, without regard to which income is assigned to the son, Complainants' income exceeds 300% of the Federal poverty level. In addition, even if only

the Complainants' (and not the son's) income was used, and a household size of two was assigned, Complainants' income exceeds 300% of the Federal poverty level. Accordingly, the appropriate payment arrangement was assigned.

For the foregoing reasons, it is respectfully requested that the Commission deny Complainants' Exceptions.

GROSS MCGINLEY, LLP



BY: _____

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DATE: 08/25/15

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

TIMOTHY AND SUSAN SMITH,

Complainant,

vs.

PPL ELECTRIC UTILITIES CORPORATION,

Respondent.

COMPLAINT DOCKET

NO. F-2015-2475335

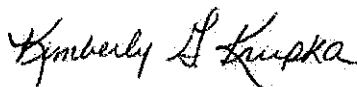
CERTIFICATE OF SERVICE

This is to certify that the Reply to Claimant's Exceptions on behalf of PPL ELECTRIC UTILITIES CORPORATION was mailed to counsel/complainant of record on behalf of Respondents by first class United States mail, postage on this the 25th day of August, 2015.

Administrative Law Judge David A. Salapa
Via Email Only dsalapa@pa.gov

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