

PENNSYLVANIA PUBLIC UTILITY COMMISSION



Protest

Filing this form begins a legal proceeding and you will be a party to the case. If you do not wish to be a party to the case, consider filing an informal complaint.

To complete this form, please type or print legibly in ink.

A-2019-3008589
A-2019-3008652

1. Customer (Complainant) Information

Provide your name, mailing address, county, telephone number(s), e-mail address and utility account number. It is your responsibility to update the Commission with any changes to your address and to where you want documents mailed to you.

Name Dennis J. & Jeanne M. Zona

Street/P.O. Box 108 Wynview Drive

City Coraopolis State PA Zip 15108

County Allegheny

Telephone Number(s) Where We Can Contact You During the Day:

(412) 269-1745 (home) (412) 508-1989 (mobile)

E-mail Address (optional): dzona108@verizon.net

Utility Account Number (from your bill)

If your complaint involves utility service provided to a different address or in a different name than your mailing address, please list this information below.

Name: Same

Street/P.O. Box: Same

City: Same State: Same Zip: Same

2. Name of Utility or Company (Respondent)

Provide the full name of the utility or company about which you are complaining. The name of your utility or company is on your bill.

Duquesne Light Company, 411 Seventh Avenue, Pittsburgh, PA 15230-1930

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**3. Type of Utility Service**

**Check the box listing the type of utility service that is the subject of your complaint (check only one):**

- ELECTRIC                       WASTEWATER/SEWER
- GAS                                       TELEPHONE/TELECOMMUNICATIONS (local, long distance)
- WATER                                       MOTOR CARRIER (e.g. taxi, moving company, limousine)
- STEAM HEAT

**4. Reason for Complaint**

**What kind of problem are you having with the utility or company? Check all boxes below that apply and state the reason for your complaint. Explain specifically what you believe the utility or company has done wrong. Provide relevant details including dates, times and places and any other information that may be important. If the complaint is about billing, tell us the amount you believe is not correct. Use additional paper if you need more space. **Your complaint may be dismissed without a hearing if you do not provide specific information.****

- The utility is threatening to shut off my service or has already shut off my service.
- I would like a payment agreement.
- Incorrect charges are on my bill. Provide dates that are important and an explanation about any amounts or charges that you believe are not correct. Attach a copy of the bill(s) in question if you have it/them.
- I am having a reliability, safety or quality problem with my utility service. Explain the problem, including dates, times or places and any other relevant details that may be important.
- Other : See attached 3 page Formal Complaint to Duquesne Light Company
- Application No. A-2019 - 3008589
  - Application No. A-2019 - 3008652

**Note: If your complaint is only about removing or modifying a municipal lien filed by the City of Philadelphia, the Public Utility Commission (PUC) cannot address it. Only local courts in Philadelphia County can address this type of complaint. The PUC can address a complaint about service or incorrect billing even if that amount is subject to a lien.**

In addition, the PUC generally does not handle complaints about cell phone or Internet service, but may be able to resolve a dispute regarding voice communications over the Internet (including the inability to make voice 911/E911 emergency calls) or concerns about high-speed access to Internet service.

**5. Requested Relief**

**How do you want your complaint to be resolved? Explain what you want the PUC to order the utility or company to do. Use additional paper if you need more space.**

- **Four suggested solutions are listed in the attached 3 page Formal Complaint document on page 3 of 3.**

**Note: The PUC can decide that a customer was not billed correctly and can order billing refunds. The PUC can also fine a utility or company for not following rules and can order a utility or company to correct a problem with your service. Under state law, the PUC cannot decide whether a utility or company should pay customers for loss or damages. Damage claims may be sought in an appropriate civil court.**

**6. Protection From Abuse (PFA)**

**Has a court granted a "Protection From Abuse" order that is currently in effect for your personal safety or welfare? The PUC needs this information to properly process your complaint so that your identity is not made public.**

**Note: You must answer this question if your complaint is against a natural gas distribution utility, an electric distribution utility or a water distribution utility AND your complaint is about a problem involving billing, a request to receive service, a security deposit request, termination of service or a request for a payment agreement.**

Has a court granted a "Protection From Abuse" order for your personal safety or welfare?

YES        
NO       

If your answer to the above question is "yes," attach a copy of the current Protection From Abuse order to this Formal Complaint form.

**7. Prior Utility Contact**

**a. Is this an appeal from a decision of the PUC's Bureau of Consumer Services (BCS)?**

YES        
NO       

**Note: If you answered yes, move to Section 8. No further contact with the utility or company is required. If you answered no, answer the question in Section 7 b. and answer the question in Section 7 c. if relevant.**

**b. If this is not an appeal from a BCS decision, have you spoken to a utility or company representative about this complaint?**

YES



Preliminarily on March 8, 2017, Mr. Travis Moore, Sr. Proj. Mgr.

NO



**Note: You must contact the utility first if (1) you are a residential customer, (2) your complaint is against a natural gas distribution utility, an electric distribution utility or a water utility AND (3) your complaint is about a billing problem, a service problem, a termination of service problem, or a request for a payment agreement.**

**c. If you tried to speak to a utility company representative about your complaint but were not able to do so, please explain why.**

**Note: Even if you are not required to contact the utility or company, you should always try to speak to a utility or company representative about your problem before you file a Formal Complaint with the PUC.**

**8. Legal Representation**

**If you are filing a Formal Complaint as an individual on your own behalf, you are not required to have a lawyer. You may represent yourself at the hearing.**

If you are already represented by a lawyer in this matter, provide your lawyer's name, address, telephone number, and e-mail address, if known. Please make sure your lawyer is aware of your complaint. If represented by a lawyer, both you and your lawyer must be present at your hearing.

Lawyer's Name: Will provide later.

Street/P.O. Box \_\_\_\_\_

City \_\_\_\_\_ State \_\_\_\_\_ Zip \_\_\_\_\_

Area Code/Phone Number \_\_\_\_\_

E-mail Address (if known) \_\_\_\_\_

**Note: Corporations, associations, partnerships, limited liability companies and political subdivisions are required to have a lawyer represent them at a hearing and to file any motions, answers, briefs or other legal pleadings.**

**9. Verification and Signature**

**You must sign your complaint.** Individuals filing a Formal Complaint must print or type their name on the line provided in the verification paragraph below and must sign and date this form in ink. If you do not sign the Formal Complaint, the PUC will not accept it.

Verification: DENNIS J. ZONA

We JEANNE M. ZONA, hereby state that the facts above set forth are true and correct (or are true and correct to the best of my knowledge, information and belief) and that I expect to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa. C.S. § 4904 (relating to unsworn falsification to authorities).

*Dennis J. Zona*

6/13/2019

*Jeanne M. Zona*

6/13/2019

(Signature of Complainant)

(Date)

**Title of authorized employee or officer** (only applicable to corporations, associations, partnerships, limited liability companies or political subdivisions)

Note: If the Complainant is a corporation, association, partnership, limited liability company or political subdivision, the verification must be signed by an authorized officer or authorized employee. If the Formal Complaint is not signed by one of these individuals, the PUC will not accept it.

**10. Two Ways to File Your Formal Complaint**

**Electronically.** You must create an account on the PUC's eFiling system, which may be accessed at <http://www.puc.pa.gov/efiling/default.aspx>.

**Note:** If you are appealing your Bureau of Consumer Services (BCS) decision, you must file your formal complaint by mail.

**Mail.** Mail the completed form with your original signature and any attachments, by certified mail, first class mail, or overnight delivery to this address:

Secretary  
Pennsylvania Public Utility Commission  
400 North Street  
Harrisburg, Pennsylvania 17120

Note: Formal Complaints sent by fax or e-mail will not be accepted.

If you have any questions about filling out this form, please contact the Secretary's Bureau at 717-772-7777.

Keep a copy of your Formal Complaint for your records.

This FORMAL COMPLAINT is being filed against Duquesne Light Company for its following Applications to the Pennsylvania Public Utility Commission:

- Application No. A-2019 - 3008589
- Application No. A-2019 – 3008652

Duquesne Light Company has an easement signed circa November 24, 1914 (by Alpha Light Company) for perpetual 25' right-of-way through the property now known as 108 Wynview Drive, Moon Township, PA. This right-of-way was obtained when transmission and distribution voltages, hence circuit power capacities, were miniscule compared to today's standards and power requirements. Although power demand has obviously increased many fold over the more than one century since Duquesne Light Company has acquired this right-of-way, Duquesne Light Company has failed in its obligation for acquisition of land to support its infrastructure. Now Duquesne Light Company is attempting to use insufficient land to support growth in its transmission system demand.

Somewhere over the last century, probably from a set of small wood poles located on a 25' right-of-way, Duquesne Light Company abused its use of the existing right-of-way and placed a 78' high steel lattice transmission, Tower #76, at the border of 108 Wynview Drive, Moon Township, PA. Judging by the construction techniques employed, Tower #76 was probably erected circa 1960. The existing Tower #76 is 23' square and is situated on a 25' wide right-of-way. The Tower foundations are literally at the edge of the right-of-way. This installation does not meet any present power industry standard ROW siting practice. No existing siting standard would recommend that a twin circuit, horizontal arrangement, 138 KV, three phase, sub-transmission power line be located where Z Circuit is installed. The existing tower should never have been placed on the right-of-way. For the past 32 years since we have owned our property, Duquesne Light Company has forced their will upon me and my neighbors by removing and pruning trees well outside their 25' right-of-way on our properties. They have utilized me and my neighbors' properties to perform their maintenance of Tower #76 because they have insufficient land for access. Duquesne Light Company's 25' right-of-way through 108 Weenie Drive does not meet accepted utility industry right-of-way width requirements for its existing 138 KV, twin circuit power corridor. A survey of dozens of power utilities' standards confirms that a typical 138 KV sub-transmission circuit is normally sited on a minimum 100' right-of-way. Also depending upon the type of support structure utilized, a right-of-way of 120' is common.

On March 15, 2019, Duquesne Light Company has now requested the Public Utility Commission to approve yet another misuse of the existing circa November 14, 1914, right-of-way through 108 Weenie Drive, Moon Township, PA. The present Duquesne Light Company application is to **replace a 78' high** lattice tower, twin circuit, 138 KV power corridor **with a gargantuan 185' high** monopole. They intend to once again place the support monopole structure on an unacceptably narrow 25' right-of-way that does not meet accepted industry standards for right-of-way width for any sub-transmission voltage class.

Now, for the ultimate ill-use of the existing right-of-way, Duquesne Light Company intends to increase the power corridor from a sub-transmission line to a transmission line. They intend to

accomplish this by installing 345 KV Basic Insulation Level (BIL) insulators and ACSR cabling capable of being energized at either 138 KV or 345 KV. A request by me, to the Duquesne Light Company Project Manager (Mr. Travis Moore), for conductor capacity intended to be utilized in both the new 345KV circuit and the existing 138 KV circuit has not been answered as of this writing. However, assuming old and new circuits have equal ampacity, the new upgraded 345 KV circuit will increase the power corridor transmission capability by 250%.

As an affected landowner, I am skeptical that Duquesne Light Company's motives, to install monopoles and increased power capability of 250%, are purely for maintenance reasons. I can see how an end goal might be rooted in the economics of changing a sub-transmission corridor into a transmission corridor. The change will ultimately yield the ability to market additional energy using this transmission corridor.

The aerial conductors pose health concerns for my wife and me, as well as our 11 very young grandchildren, who frequent our premises. There have been exhaustive arguments about both electric field and magnetic fields below aerial lines and around transmission system right-of-ways. EMF field strength impact on human health is still being debated. The industry standard practice of siting 345 KV transmission circuits on 150' wide right-of-ways is to mitigate health effects and enhance electrical safety. Duquesne Light Company intends to place a 345 KV circuit on this existing 25' wide right-of-way. Clearly, this Z Circuit right-of-way width is insufficient and unsuitable based upon health and safety concerns. The magnetic field (milligauss strength) is reduced to accepted industry standard levels only by sufficient right-of-way width of 150'.

Where is the assurance, let alone the guarantee, sleeping in the bedrooms lining both sides of this insufficient right-of-way will not cause long term injurious health effects to the general public? My home has bedrooms within 55' of the edge of this 25' right-of-way. What milligauss level will my wife, I, and my grandchildren be exposed to? An aerial line on this right-of-way gives the utility no means to mitigate the Gauss field strength. An alternative underground duct bank design will afford Duquesne Light Company an opportunity to employ magnetic field management techniques, such as:

- use of a phase arrangement of the two circuits' conductors that produces the lowest magnetic field
- use of depth of burial of the line conductors to control magnetic field exposure
- use of steel pipe ferromagnetic shielding to reduce magnetic field strength at the edge of the existing right-of-way
- use of a duct bank design that allows for close proximity of a circuit's three phase conductors which can have some magnetic field cancellation effect

Once again, the existing 25' wide right-of-way is six times narrower than accepted power industry standard of a 150' wide required right-of-way. The risk of increased cancer to the general public living along the increased power capacity corridor will be unacceptable on such a narrow right-of-way.

The increased risk of dangerous step voltage under and around the increased voltage 345KV transmission line in such a high density neighborhood is unacceptable.

The 345KV transmission line will produce higher corona effect and result in more nuisance audible noise. Corona is the ionization of the air that occurs at the surface of the energized conductor and suspension hardware due to very high electric field strength at the surface of the metal during certain conditions. Our residence presently experiences audible noise from the crackle of the existing 138KV sub-transmission line insulator leakage frequently on foggy, rainy, misty and snowy days.

Possible high voltage nuisance static discharges on passenger vehicles and school buses parked under the line or passing on neighborhood public roadways through the housing plan is unacceptable.

Existing sub-transmission steel lattice towers along the power corridor are in the magnitude of 78' in height. The proposed Tower #76 replacement monopole is a whopping 185' in height. Proposed Tower #77 replacement monopole is an unbelievable 195' in height. The aesthetic impact of these massively tall structures will be visual eyesores in an established neighborhood. The consequences on property resale value will be extremely negative. The outcome for Moon Township and Moon Area School District tax basis assessed property values along the upgraded transmission corridor will be detrimental. In other words, an extremely unfair burden will be placed upon the property owners in North Wyngate area of Moon Township, PA.

Finally, the degradation in the quality of life in an established mature residential neighborhood will be enormous and the tranquility lost by the proposed project.

**Any one of the following four options is acceptable as a resolution to this complaint:**

1. Choose an alternate route through Moon Township for the proposed upgraded capacity Z Circuit power corridor.
2. Redesign the Z Circuit power corridor capacity increase to change a minor portion of it from an aerial conductor design to an underground duct bank design. This will entail utilizing an underground design for routing between existing aerial towers #75, #76, #77, #78 and #79. Beyond Tower #79, the Z circuit can again become an aerial power corridor. (Note: This same solution was reached by Pennsylvania Power & Light Company (PPL) in a dispute with residents in Derry Township, Dauphin County, PA on February 13, 2019. PPL will remove aerial transmission lines in a neighborhood and reroute up to four miles of newly-constructed transmission lines underground).
3. Purchase home and property owned by Dennis J. and Jeanne M. Zona at 108 Wynview Drive, Moon Township, PA.
4. Stop the proposed project. Leave the existing Z Circuit power corridor as is: a twin, 138 KV, three phase, aerial circuit, on present height towers. Duquesne Light can then pursue an alternate means to solve their transmission system issue.

PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

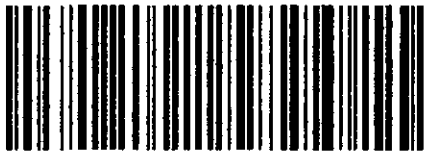
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Dennis J. & Jeanne M. Zona  
108 Wynview Drive  
Coraopolis Pa 15108-1033

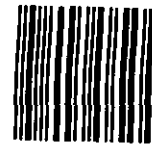
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Pennsylvania Public Utility Commission  
400 North Street  
Harrisburg, PA 17120