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File #: 166407

July 8, 2019

VIA ELECTRONIC FILING

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

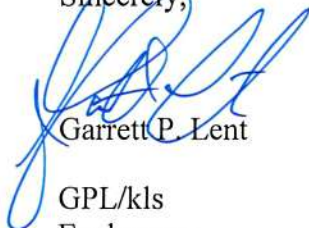
**Re: Application of Duquesne Light Company filed Pursuant to 52 Pa. Code Chapter 57, Subchapter G, for Approval of the Siting and Construction of the 138 kV Transmission Lines Associated with the Brunot Island-Crescent Project in the City of Pittsburgh, McKees Rocks Borough, Kennedy Township, Robinson Township, Moon Township, and Crescent Township, Allegheny County, Pennsylvania
Docket No. A-2019-3008589**

Dear Secretary Chiavetta:

Enclosed for filing are the Preliminary Objections of Duquesne Light Company to the Protest of Joseph G. and Suzanne L. Rabosky.

Copies are being provided per the attached Certificate of Service.

Sincerely,



Garrett P. Lent

GPL/kls
Enclosures

cc: Certificate of Service

ALLENTOWN HARRISBURG LANCASTER PHILADELPHIA PITTSBURGH PRINCETON WASHINGTON, D.C.

A PENNSYLVANIA PROFESSIONAL CORPORATION

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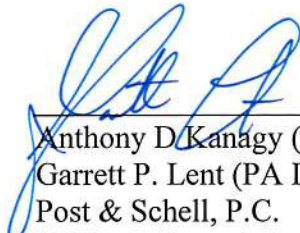
**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Application of Duquesne Light Company :
filed Pursuant to 52 Pa. Code Chapter 57, :
Subchapter G, for Approval of the Siting and : Docket No. A-2019-3008589
Construction of the 138 kV Transmission :
Lines Associated with the **Brunot Island** – :
Crescent Project in the City of Pittsburgh, :
McKees Rocks Borough, Kennedy :
Township, Robinson Township, Moon :
Township, and Crescent Township, :
Allegheny County, Pennsylvania :
:
:
:
Joseph G. and Suzanne L. Rabosky :

NOTICE TO PLEAD

YOU ARE HEREBY ADVISED THAT, PURSUANT TO 52 PA. CODE § 5.101, YOU MAY ANSWER THE ENCLOSED PRELIMINARY OBJECTIONS WITHIN TEN (10) DAYS OF THE DATE OF SERVICE HEREOF. YOUR ANSWER TO THE PRELIMINARY OBJECTIONS MUST 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 FOR DUQUESNE LIGHT COMPANY.

Tishekia William (PA ID # 208997)
Emily Farah (PA ID # 322559)
Duquesne Light Company
411 Seventh Avenue
Pittsburgh, PA 15230
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Date: July 8, 2019

Attorneys for Duquesne Light Company

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Application of Duquesne Light Company :
filed Pursuant to 52 Pa. Code Chapter 57, :
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Allegheny County, Pennsylvania :
:
:
Joseph G. and Suzanne L. Rabosky :

**PRELIMINARY OBJECTIONS OF
DUQUESNE LIGHT COMPANY TO THE
PROTEST OF JOSEPH G. & SUZANNE L. RABOSKY**

TO THE HONORABLE ADMINISTRATIVE LAW JUDGE MARY D. LONG:

AND NOW, comes Duquesne Light Company (“Duquesne Light” or the “Company”) and hereby files Preliminary Objections, pursuant to the regulations of the Pennsylvania Public Utility Commission (“Commission”) at 52 Pa. Code § 5.101, and respectfully requests that the Commission dismiss certain of the claims contained in the above-captioned Protest filed by Joseph G. and Suzanne L. Rabosky (“Protestants”)¹ with prejudice.

A substantial portion of the Protest deals with non-jurisdictional issues related to the interpretation, enforcement or adjudication of a pre-existing easement agreement between

¹ Duquesne Light received a Formal Complaint from the Protestants on June 18, 2019. No docket number has been assigned to the pleading. As the pleading contests and opposes the electric transmission line siting application at Docket No. A-2019-3008589, Duquesne Light is treating the pleading as a Protest to the Application.

Duquesne Light and the Protestants. The Protest avers, *inter alia*, that the Company's practices and the contemplated transmission line project violate the easement.

As explained herein, the Commission should dismiss certain claims contained in the Protest because the Commission lacks jurisdiction over certain of the claims contained therein.

In support thereof, Duquesne states as follows:

I. BACKGROUND

1. Duquesne Light is a "public utility" and an "electric distribution company" as those terms are defined under the Public Utility Code, 66 Pa. C.S. §§ 102 and 2803, subject to the regulatory jurisdiction of the Commission.

2. Duquesne Light furnishes electric service to approximately 596,000 customers throughout its certificated service territory, which includes all or portions of Allegheny and Beaver Counties and encompasses approximately 800 square miles in western Pennsylvania.

3. On March 15, 2019, Duquesne Light filed: (1) "Application of Duquesne Light Company filed Pursuant to 52 Pa. Code Chapter 57, Subchapter G, for Approval of the Siting and Construction of the 138 kV Transmission Lines Associated with the Brunot Island – Crescent Project in the City of Pittsburgh, McKees Rocks Borough, Kennedy Township, Robinson Township, Moon Township, and Crescent Township, Allegheny County, Pennsylvania," at Docket No. A-2019-3008589 ("BI-Crescent Full Siting Application"); and (2) "Application of Duquesne Light Company Under 15 Pa.C.S. § 1511(c) For A Finding and Determination That the Service to be Furnished by the Applicant Through Its Proposed Exercise of the Power of Eminent Domain to Acquire a Certain Portion of the Lands of George N. Schaefer of Moon Township, Allegheny County, Pennsylvania for the Siting and Construction of Transmission Lines Associated with the Proposed Brunot Island – Crescent Project is Necessary

or Proper for the Service, Accommodation, Convenience, or Safety of the Public,” at Docket No. A-2019-3008652 (“Schaefer Condemnation Application”).

4. On March 28, 2019, the Administrative Law Judge Mary D. Long (the “ALJ”) issued a Prehearing Conference Order, which scheduled a Prehearing Conference in the matters at Docket Nos. A-2019-3008589 and A-2019-3008652 for June 6, 2019.

5. Notice of the BI-Crescent Full Siting Application and the Schaefer Condemnation Application was published in the April 6, 2019 edition of the *Pennsylvania Bulletin*.

6. Duquesne Light published Proof of Publication of notice of the filings with the Commission on April 30, 2019.

7. A Prehearing Conference was held on June 6, 2019.

8. On June 7, 2019, the ALJ issued an Interim Order Extending Protest Period and Scheduling a Further Prehearing Conference at Docket Nos. A-2019-3008589, A-2019-3008652. Therein, the ALJ extended the deadline for filing a “protest or petition to intervene in order to become a party of record in this matter” to June 21, 2019.

9. Duquesne Light received a Formal Complaint from the Protestants on June 18, 2019. No docket number has been assigned to the pleading. As the pleading contests and opposes the electric transmission line siting application at Docket No. A-2019-3008589, Duquesne Light is treating the pleading as a Protest to the Application. A true and correct copy of the Protest is attached hereto as **Appendix A**.

10. As explained herein, the Commission should dismiss certain claims contained in the Protest because the Commission lacks jurisdiction over the claims contained therein.

II. STANDARD OF REVIEW

11. Pursuant to the Commission’s regulations, preliminary objections in response to a pleading may be filed on several grounds, including:

- (1) Lack of Commission jurisdiction or improper service of the pleading initiating the proceeding.
- (2) Failure of a pleading to conform to this chapter or the inclusion of scandalous or impertinent matter.
- (3) Insufficient specificity of a pleading.
- (4) Legal insufficiency of a pleading.
- (5) Lack of capacity to sue, nonjoinder of a necessary party or misjoinder of a cause of action.
- (6) Pendency of a prior proceeding or agreement for alternative dispute resolution.
- (7) Standing of a party to participate in the proceeding.

52 Pa. Code § 5.101(a) (emphasis added).

12. In ruling on preliminary objections, the Presiding Officer must accept as true all well-pled allegations of material facts as well as all inferences reasonably deducible therefrom. *Stilp v. Cmwlth.*, 910 A.2d 775, 781 (Pa. Cmwlth. 2006) (citing *Dep't of Gen. Servs. v. Bd. of Claims*, 881 A.2d 14 (Pa. Cmwlth. 2005)). However, the Presiding Officer need not accept as true conclusions of law, unwarranted inferences from facts, argumentative allegations, or expressions of opinion. *Stanton-Negley Drug Co. v. Dep't of Pub. Welfare*, 927 A.2d 671, 673 (Pa. Cmwlth. 2007). Notwithstanding, any doubt must be resolved in favor of the non-moving party. *Stilp*, at 781.

13. In addition, the Presiding Officer must determine whether, based on the factual pleadings, if recovery is possible. *See Rok v. Flaherty*, 527 A.2d 211, 214 (Pa. Cmwlth. 1987). Indeed, for preliminary objections to be sustained, it must appear with certainty that the law will permit no recovery. *See Stilp*, at 781; *Milliner v. Enck*, 709 A.2d 417, 418 (Pa. Super. 1998).

III. PRELIMINARY OBJECTIONS

A. PRELIMINARY OBJECTION NO. 1 – THE COMMISSION LACKS JURISDICTION OVER THE PROTESTANTS’ CLAIMS

14. Duquesne Light incorporates by reference Paragraphs 1 through 13 as if fully set forth herein.

15. The Protestants’ claims regarding easement interpretation and property disputes should be dismissed because the Commission lacks jurisdiction over these claims. *See* 52 Pa. Code § 5.101(a)(1).

16. As a “creature of statute,” the Commission “has only those powers which are expressly conferred upon it by the Legislature and those powers which arise by necessary implication.” *Feingold v. Bell of Pa.*, 383 A.2d 791, 794 (Pa. 1977) (citing *Allegheny Cnty. Port Auth. v. Pa. PUC*, 237 A.2d 602 (Pa. 1967); *Del. River Port Auth. v. Pa. PUC*, 145 A.2d 172 (Pa. 1958)).

17. In fact, the Commission generally lacks jurisdiction to interpret, enforce, or adjudicate claims regarding a contract between private entities. *See Pettko v. Pa. Am. Water Co.*, 39 A.3d 473, 478 n.9 (Pa. Cmwlth. 2012) (“[T]here can be no dispute that the courts of common pleas have subject matter jurisdiction over common law claims such as conversion and breach of contract involving private individuals and businesses.”); *Adams v. Pa. PUC*, 819 A.2d 631, 635 (Pa. Cmwlth. 2003) (“[T]he PUC lacks jurisdiction over private contractual disputes.”). The Commission is not even “jurisdictionally empowered to decide private contractual disputes between a citizen and a utility.” *Allport Water Auth. v. Winburne Water Co.*, 393 A.2d 673, 675 (Pa. Super. 1978) (citations omitted); *see also Virgilli v. Sw. Pa. Water Authority*, 427 A.2d 1251, 1254 (Pa. Cmwlth. 1981) (“[T]he Code does not grant the PUC general supervisory

powers over contracts involving public utilities.”). Such contract issues are reserved for courts of common pleas.

18. The Pennsylvania Supreme Court has further held that the Commission does not have jurisdiction to determine the scope and validity of an easement. *Fairview Water Company v. Pa. Pub. Util. Comm’n*, 502 A.2d 162 (Pa. 1985) (“...the PUC does not have jurisdiction to determine the scope and validity of an easement. Once there has been a determination by the PUC that the proposed service is necessary and proper, the issues of scope and validity and damages must be determined by a Court of Common Pleas exercising equity jurisdiction.”).

19. The Commission is similarly without jurisdiction over other real property issues such as trespass and the location of utility facilities pursuant to valid easements. *See Shedlosky v. Pennsylvania Electric Co.*, Docket No. C-20066937 (Order entered May 28, 2008); *see also Anne E. Perrige v. Metropolitan Edison Co.*, Docket No. C-00004110 (Order entered July 11, 2003) (Commission had no jurisdiction to interpret the meaning of a written right-of-way agreement); *Samuel Messina v. Bell Atlantic-Pennsylvania, Inc.*, Docket No. C-00968225 (Order entered Sept. 23, 1998) (“The Commission has clearly stated in prior decisions that it is without subject matter jurisdiction to adjudicate questions involving trespass and whether or not utility facilities are located pursuant to valid easements or rights-of-way.” (citation omitted)).

20. Applied here, the Protest avers the existence of an easement agreement between the Protestants and the Company. *See* Protest ¶ 4 (attachment page 1, numbered paragraph 1). The Protest then asks the Commission to determine the scope the easement, to determine whether Duquesne Light’s current or proposed use is inconsistent with the agreement. *See* Protest ¶ 4 (attachment page 1, numbered paragraph 1 (“Duquesne Light has been negligent in securing and expanding its right-of-way to accommodate future needs.”). The Protestants’

requests for relief are based upon its request that the Commission determine the scope and applicability of this easement, a function that is beyond the Commission's power, authority and jurisdiction.

21. Accordingly, and assuming all of the well-pleaded facts contained in the Protest are true, any claim's regarding the scope and validity of an existing easement and/or the Company's compliance therewith are not within the Commission's jurisdiction because, as a matter of law, the acts complained of relate to a private contract between a landowner and a utility. Protest ¶ 4 (attachment pages 1, numbered paragraph 1). The Commission is without jurisdiction to grant the relief requested based such claims.

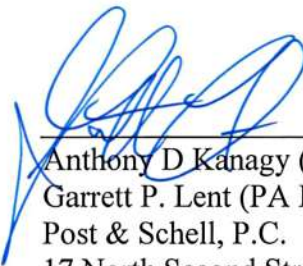
22. Therefore, any claims regarding the scope or validity of an easement agreement, compliance therewith, or damages resulting from an alleged violation of an easement, should be dismissed with prejudice.

IV. CONCLUSION

WHEREFORE, Duquesne Light Company respectfully requests that certain of the claims contained in the above-captioned Protest filed by Joseph G. and Suzanne L. Rabosky at Docket Nos. A-2019-3008589 and C-2019-3010833 be dismissed pursuant 52 Pa. Code § 5.101(a)(1).

Respectfully submitted,

Tishekia William (PA ID # 208997)
Emily Farah (PA ID # 322559)
Duquesne Light Company
411 Seventh Avenue
Pittsburgh, PA 15230
E-mail: twilliams@duqlight.com
efarah@duqlight.com



Anthony D Kanagy (PA ID # 85522)
Garrett P. Lent (PA ID # 321566)
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Date: July 8, 2019

Attorneys for Duquesne Light Company

APPENDIX A

**PROTEST FILED BY JOSEPH G. AND SUZANNE
L. RABOSKY AGAINST DUQUESNE LIGHT
COMPANY**

PENNSYLVANIA PUBLIC UTILITY COMMISSION

Formal Complaint

*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.

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 Joseph G. & Suzanne L. Rabosky _____

Street/P.O. Box __104 Wynview Drive _____

City Coraopolis State PA Zip 15108 _____

County __Allegheny

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

(412) 262-2162_ (home)

E-mail Address (optional): __josuz69@Comcast.net

Utility Account Number (from your bill) __DLCo 0154-910-000

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

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 letter

- 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 Mr. Travis Moore – Senior Project Manager
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: _____

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:

We JOSEPH G & SUZANNE L. RABOSKY, 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).

Joseph G. Rabosky Suzanne L. Rabosky 06/16/2019
(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.

June 14, 2019

Ms. Emily Farah
Duquesne Light Company
411 Seventh Avenue
Pittsburgh, PA 15230-1930

Dear Ms. Farah:

Although we were unable to attend the June 6, 2019, Prehearing Conference, we have composed this letter in response to the Court's invitation to express objections to Duquesne Light's proposed construction of higher voltage power transmission lines in the right-of-way behind our residence at 104 Wynview Drive in Moon Township. Our concerns are as follows:

1. Existing Right-of-Way Width of 25 feet:

This Right-of-Way is clearly inadequate for the new construction featuring 185± foot high transmission line support structures. Should a structural failure occur, the residents along this very narrow right-of-way could potentially be at a catastrophic risk for damage or even bodily harm. Because the existing 25-foot right-of-way was established over a century ago in 1914, it is very apparent that Duquesne Light has been negligent in securing and expanding its right-of-way to accommodate future needs. Now, Duquesne Light is seeking to squeeze the proposed transmission lines into this very narrow right-of-way which, in turn, suggests that contiguous property owners reward their negligence with increased risk!

2. Potential Health Issues:

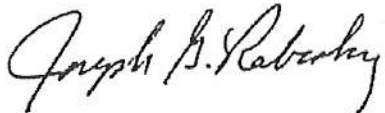
Studies have been undertaken in past attempts to relate EMF's (Electromagnetic Fields which are created by electrical currents) to cancer. Our understanding is that no direct links have as yet been determined; however, we must question the wisdom of this project if future studies discover that a relationship does exist. None of us are clairvoyant, but a future revelation defining EMFs as a cancer causative agent would jeopardize the health and well-being of many who live along this right-of-way, especially with the increase in proposed electrical capacity.

Both of us are cancer survivors and are sensitive to any issues that are cancer related. We are fearful that the completion of the proposed project will expose us to a potential future harmful electromagnetic field that could cause the return of our cancer(s). As residents living along the existing right-of-way, we cannot understand how the Court can even consider such a potentially damaging proposal from Duquesne Light Company. Therefore, as stated by the above reasons, we strongly oppose the proposed construction project presented by

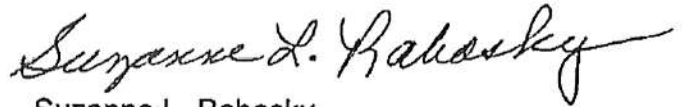
Duquesne Light Company. Duquesne Light should explore alternative routes that, although perhaps more expensive, will ensure the safety of local property owners.

We trust that the Court will consider our objections before issuance of its final decision. Thank you for allowing us to voice our concerns.

Very truly yours,



Joseph G. Rabosky, Ph.D.



Suzanne L. Rabosky

CERTIFICATE OF SERVICE
(A-2019-3008589 and A-2019-3008652)

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

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Partner
Fox Rothschild LLP
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Pittsburgh, PA 15219

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Coraopolis, PA 15108

John P. Crowe
Jennifer A. Crowe
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Coraopolis, PA 15108

Victoria Adams
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Aaron Siegel
Rebecca Siegel
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Coraopolis, PA 15108

Dennis J. Zona
Jeanne M. Zona
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Coraopolis, PA 15108

Richard I. Gable
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Coraopolis, PA 15108

Zachariah R. Nave
P.O. Box 524
Clarion, PA 16214


Zachariah R. Nave
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Crescent, PA 15046

Folezia A. Marinkovic
Steve M. Marinkovic
205 Purdy Road
Crescent, PA 15046

Cynthia Chamberlin Wilson
Patrick Wilson
9 McGovern Boulevard
Crescent, PA 15046

Joseph G. and Suzanne L. Rabosky
104 Wynview Drive
Coraopolis, PA 15108

Dated: July 8, 2019



Garrett P. Lent