

**JOHN SHNIPER**  
ATTORNEY AT LAW  
206 GAY STREET, REAR  
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SECRETARY'S BUREAU

March 22, 2011

Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street, Second Floor  
Harrisburg, PA 17120

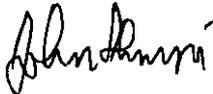
FAX: 215-568-3389

RE: James Stimson vs PECO Energy Company  
Docket No: C-2010-2195789

Dear Ms. Chiavetta:

I am enclosing an original and copy of complainants Motion to join Blaise McHugh as an indispensable party. Please direct all further contacts to my office. Also enclosed please find Certificate of Service. Please return time stamped copies in enclosed SASE.

Very truly yours,



John Shniper  
JS/clf

Enclosures

cc: James Stimson  
Tishekia Williams, Counsel for PECO  
Blaise McHugh  
ALJ Angela T. Jones

JOHN SHNIPER, ESQUIRE  
ID NO: 15393  
206 GAY STREET, REAR  
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Attorney for Complainant

**Before The  
Pennsylvania Public Utility Commission**

James Stimson

vs

PECO Energy Company

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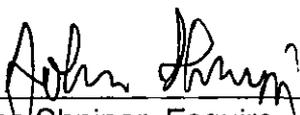
C-2010-2156178

**MOTION TO ADD BLAISE MCHUGH, 130 ORCHARD WAY,  
POTTSTOWN, PA AS AN INDISPENSIBLE PARTY**

James Stimson by his attorney, John Shniper, Esquire hereby moves to add Blaise McHugh, record owner of 130 Orchard Way, Pottstown, Pa., South Coventry Township as an indispensable party and in support thereof avers:

1. Complainant James Stimson incorporates by reference the allegations of his PUC complaint filed in this matter and also the Answer of respondent PECO Energy Company.
2. James Stimson has alleged that the power lines to the property located at 130 Orchard Way, Pottstown, PA, South Coventry Township are a nuisance, a hazards and a burden on the property owned in part by him.
3. PECO Energy has responded that the power lines in question are not the property of PECO Energy but are part of the Title or Asserted Title of the property located at 130 Orchard Way, Pottstown, PA, South Coventry Township.
4. PECO Energy has further asserted that the record owner of this property, Blaise McHugh has objected to any plan to relocate the power lines in questions along a record existing Right of Way to provide electrical power service to 130 Orchard Way.
5. That a full and complete Hearing and effective relief cannot be afforded to James Stimson without the joinder as an indispensable party.

Wherefore, it is requested that the Hearing Officer grant this motion and join Blaise McHugh record owner of 130 Orchard Way, Pottstown, PA as an indispensable party.

  
\_\_\_\_\_  
John Shniper, Esquire

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-----Attorney for Complainant

**Before The  
Pennsylvania Public Utility Commission**

James Stimson

vs

PECO Energy Company

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C-2010-2156178

**Certificate of Service**

I, John Shniper, hereby certify that I have served by First Class Mail Postage Pre-paid a copy of Complainant's Motion to Join Blaise McHugh in the above matter to the persons listed below:

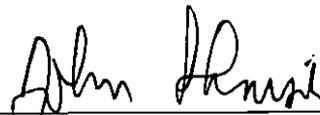
Tishekia Williams  
Counsel for PECO Energy Company  
2301 Market Street, S23-1  
P.O. Box 8699  
Philadelphia, PA 19101-8699

Blaise McHugh  
130 Orchard Way  
Pottstown, PA 19465  
w/copy of Complaint and Answer  
and Notice of Hearing of April 1, 2011

James Stimson  
P.O. Box 40  
St. Peters, PA 19470

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