

JOHN SHNIPER
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206 GAY STREET, REAR
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PHOENIXVILLE, PENNSYLVANIA 19460
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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 complainant's Motion to join Blaise McHugh and Lorinda R. Melot as 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*
JS/clf

Enclosures

cc: James Stimson
Tishkia Williams, Counsel for PECO
Blaise McHugh
ALJ Angela T. Jones
Lorinda R. Melot

RECEIVED
2011 MAR 25 AM 9:50
PA P.U.C.
SECRETARY'S BUREAU

JOHN SHNIPER, ESQUIRE
ID NO: 15393
206 GAY STREET, REAR
P.O. BOX 598
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(610) 935-2880

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2011 MAR 25 AM 9:50

PA P.U.C.
SECRETARY
Attorney for Complainant

**Before The
Pennsylvania Public Utility Commission**

James Stimson :
 :
 vs : C-2010-2156178
 :
 PECO Energy Company :

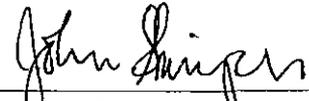
**MOTION TO ADD BLAISE MCHUGH AND LORINDA R. MELOT, 130
ORCHARD WAY, POTTSTOWN, PA AS INDISPENSIBLE PARTY**

James Stimson by his attorney, John Shniper, Esquire hereby moves to add Blaise McHugh and Lorinda R. Melot, record owners of 130 Orchard Way, Pottstown, Pa., South Coventry Township as 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 and Lorinda R. Melot have 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 and Lorinda R. Melot record owners of 130 Orchard Way, Pottstown, PA as indispensable party.

A handwritten signature in cursive script that reads "John Shniper". The signature is written in black ink and is positioned above a horizontal line.

John Shniper, Esquire

JOHN SHNIPER, ESQUIRE
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-----Attorney for Complainant-----

**Before The
Pennsylvania Public Utility Commission**

James Stimson

vs

PECO Energy Company

:
:
:
:
:

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:

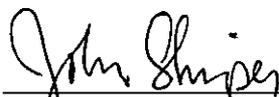
Tishekia Williams
Counsel for PECO Energy Company
2301 Market Street, S23-1
P.O. Box 8699
Philadelphia, PA 19101-8699

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

Lorinda R. Melot
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

March 23, 2011

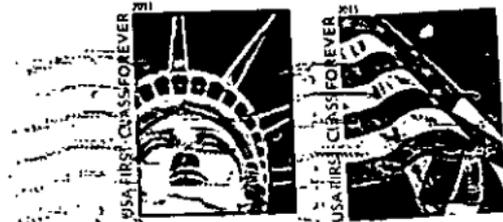


John Shniper, Esquire

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