

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

THOMAS AND WILLIE MAE WHITE,

COMPLAINANT,

VS.

PPL ELECTRIC UTILITIES CORPORATION,

RESPONDENT.

COMPLAINT DOCKET

NO. C-2013-2347776

**PRELIMINARY OBJECTIONS OF PPL ELECTRIC UTILITIES CORPORATION**

PPL Electric Utilities Corporation (PPL Electric), by and through its attorneys of record, Gross McGinley, LLP, hereby make the following Preliminary Objections to Complaint of Thomas and Willie Mae White, pursuant to 52 Pa. Code 5.101, and in support thereof, alleges as follows:

1. PPL Electric hereby incorporates those averments set forth in its Answer contemporaneously filed in the above-captioned case as if more fully set forth at length.

2. Complainants, Thomas and Willie Mae White, filed a Complaint against PPL Electric alleging that PPL Electric improperly maintained the water and gas lines outside of their home. See Complaint at paragraph 4 and 5, a true and correct copy of which is attached hereto as **Exhibit "A"**.

3. As a creature of legislation, the PUC possesses only the authority that the state legislature has specifically granted to it and the Public Utility Code, 66 Pa.CS§101, et. seq.

4. The PUC's jurisdiction must arise from the express language of the pertinent enabling legislation of a strong and necessary implications therefrom. Feingold v. Bell of Pennsylvania, 477 Pa.1, 383 A.2d 791 (1977).

5. The PUC must act within and cannot exceed its jurisdiction. City of Pittsburgh v. PA Public Utility Commission, 43 A.2d 348 (PA Super. 1945).

6. Complainants Complaint pertains to claims relative to the provision of her gas and water.

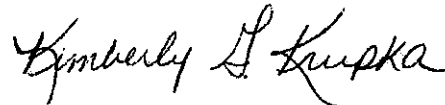
7. PPL Electric does not provide gas or water service to Complainant.

8. There is no factual or legal basis for the PUC to grant, as to entertain jurisdiction over, this type of request against PPL Electric.

WHEREFORE, PPL Electric Utilities Corporation, respectfully requests that the PUC deny and dismiss Complainant's Complaint as to PPL Electric.

Respectfully submitted,

GROSS MCGINLEY, LLP



BY: \_\_\_\_\_  
KIMBERLY G. KRUPKA, ESQUIRE  
*Attorney for Respondent, PPL Electric Utilities Corporation*

Dated: March 6, 2013  
In Allentown, Pennsylvania

# EXHIBIT "A"



COMMONWEALTH OF PENNSYLVANIA  
PENNSYLVANIA PUBLIC UTILITY COMMISSION  
P.O. BOX 3265, HARRISBURG, PA 17105-3265

IN REPLY PLEASE  
REFER TO OUR FILE

DATE SERVED: FEBRUARY 14, 2013

✓ Filed Dec 2/24/13  
✓ Answer Dec 3/6/13

C-2013-2347776

PPL ELECTRIC UTILITIES CORPORATION  
PAUL E RUSSELL GEN COUNSEL  
TWO N 9<sup>TH</sup> ST  
ALLENTOWN PA 18101-1179

**RECEIVED**

FEB 19 2013

OFFICE OF  
GENERAL COUNSEL

Dear Mr. Russell:

A complaint has been filed against you before the Pennsylvania Public Utility Commission by THOMAS AND WILLIE MAE WHITE. To defend yourself against the claims stated in the following pages, you must act within twenty (20) days by filing in writing with the Commission, either personally or through your attorney, your defenses or objections to the claims stated against you. Or, you may satisfy the complaint by settling the matter with the Complainant and submitting proof of settlement to the Commission within twenty (20) days.

IF YOU FAIL TO RESPOND WITHIN TWENTY (20) DAYS, THE CASE MAY GO FORWARD IN YOUR ABSENCE AND A JUDGEMENT MAY BE ENTERED AGAINST YOU BY THE COMMISSION WITHOUT FURTHER NOTICE.

**CUSTOMER OF A UTILITY**

A payment schedule may be prescribed or a termination of utility services may be authorized. You may lose money or property or other rights important to you.

**COMPANY/UTILITY**

An Administrative Law Judge may revoke or suspend any certificate or permit held by you, or impose a fine, or any other appropriate penalty or remedy authorized by the Public Utility Code. You may lose money or property or other rights important to you.

Detailed instructions on how to proceed are contained in the attached pages. You are advised to read them carefully.

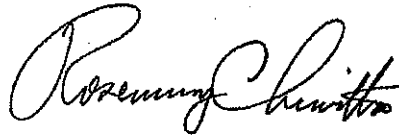
Other Utility Service  
NOT PPL  
KCK

FEBRUARY 14, 2013

Unless you are a corporation or other organization, you may proceed without a lawyer. However, if you want a lawyer and do not have one or cannot afford one, the office listed below can tell you where you can get legal help:

Pennsylvania Lawyer Referral Service  
Pennsylvania Bar Association  
P.O. Box 186  
Harrisburg, PA 17108  
(800) 692-7375

Very truly yours,

A handwritten signature in cursive script, appearing to read "Rosemary Chiavetta".

Rosemary Chiavetta  
Secretary

JB

**BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**DATE SERVED: FEBRUARY 14, 2013**

**THOMAS AND WILLIE MAE WHITE**  
Complainant

v.

**PPL ELECTRIC UTILITIES CORPORATION**  
Respondent

Complaint Docket  
No: C-2013-2347776

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**FORMAL COMPLAINT NOTICE TO RESPONDENT TO ANSWER OR SATISFY**

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**TO: PPL ELECTRIC UTILITIES CORPORATION**

**TAKE NOTICE:**

That a complaint in the above entitled matter, of which the attached is a true and correct copy, has been presented and filed of record with the Pennsylvania Public Utility Commission. Section 702 of the Public Utility Code, 66 Pa. C.S. Section 702, requires the Commission to serve on each party named in a complaint a copy of the complaint and notice calling upon each party to satisfy the complaint, or to answer the same in writing within a specified time; THEREFORE,

1. You have twenty (20) days from the date on which this complaint is served to either satisfy this complaint or to file with the **Secretary of the Pennsylvania Public Utility Commission, P. O. Box 3265, Harrisburg, PA 17105-3265**, an answer (original and three copies), in writing, under oath, which, as required by Section 5.61 of the Commission's Rules of Practice and Procedure, 52 Pa. Code Section 5.61, either affirms or specifically denies the allegations in this complaint. You must also serve a copy of the answer upon the complainant. The date of service is the mailing date as indicated by the date at the top of this Notice. Section 1.56(a) of the Commission's Rules of Practice and Procedure, 52 Pa. Code Section 1.56(a).

2. If you fail to either satisfy this complaint or to file answer or other responsive pleading within twenty (20) days, you will be deemed to have admitted all the allegations in this complaint in accordance with Section 5.61 of the Commission's Rules of Administrative Practice and Procedure, 52 Pa. Code Section 5.61. In that event, the Commission may, without hearing, enter an order which either revokes or suspends any certificate or permit held by you or which imposes a fine or any other appropriate penalty or remedy authorized by the Public Utility Code, 66 Pa. C.S. Section 101, et seq.; and, if

you are a customer of a utility, an order may be entered which prescribes a payment schedule or which authorizes termination of utility services. The Commission is not limited to the relief sought by the complainant in paragraph 4 of the attached complaint.

3. If you elect to satisfy this complaint you must file, within twenty (20) days from the date on which this complaint is served, affidavits executed by each complainant that this complaint has been satisfied. Such affidavits must describe the basis on which this complaint was satisfied; any settlement agreement between the parties must be reduced to writing and attached to the affidavit. Such affidavits are to be filed with the Secretary of the Commission at the address set forth in paragraph 1. Upon receipt of affidavits of satisfaction from all complainants, this complaint may be dismissed by the Commission in accordance with Section 703(a) of the Public Utility Code, 66 Pa. C.S. Section 703(a), unless the Commission determines that such dismissal would be contrary to the public interest, in which event the Commission may direct that hearings be held upon the complaint.

4. If you file an answer which admits the allegations in this complaint, or which fails to specifically deny the allegations in this complaint, the Commission may, without hearing, enter an order which either revokes or suspends any certificate held by you or which imposes a fine or any other appropriate penalty or remedy authorized by the Public Utility Code, 66 Pa. C. S. Section 101, et seq.; and, if you are a customer of a utility, an order may be entered which prescribes a payment schedule or which authorizes termination of utility services. The Commission is not limited to the relief sought by the complainant in paragraph 4 of the attached complaint.

5. If you file a timely answer which specifically denies the allegations in this complaint, or which raises material questions of law or fact, this matter shall be referred to the Office of Administrative Law Judge for hearing and decision. If, after hearing on the issues raised by that answer, you are found to have committed any of the violations alleged in the complaint, the Administrative Law Judge may render a decision which either revokes or suspends any certificate or permit held by you or which imposes a fine or any other appropriate penalty or remedy authorized by the Public Utility Code, 66 Pa. C. S. Section 101, et seq.; and, if you are a customer of a utility, an order may be entered which prescribes a payment schedule or which authorizes termination of utility services. In the imposition of a penalty after a hearing the Administrative Law Judge is not bound by the relief sought by the complainant in paragraph 4 of the attached complaint.



Rosemary Chiavetta  
Secretary

(SEAL)

Certified Mail  
Return Receipt Requested

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.

C-2013-2347776

1. Customer (Complainant) Information

Provide your name, mailing address, county, telephone number(s), e-mail address and utility account number:

Name Thomas White + Willie Mae White

Street/P.O. Box 2147 N 4th St Apt #

City Hbg State Pa Zip 17110

County Dauphin

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

(717) 2324404 (home)

(717) 7124254 (mobile)

E-mail Address (optional): # UGI 2030150001

Utility Account Number (from your bill) PPL 44001-10003 Water Well 100400770000

RECEIVED 11:06 PM 2013 FEB -14 AM 12:06 SECRETARY'S BUREAU

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

Street/P.O. Box

City State Zip

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.

PPL Electric, UGI Gas Company

Doris Jean Morris 2131 N 4th St Hbg, Pa. 17110

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 (explain).

*1/1/13 until the most recent date of 1/16/13 when we were without water due to them shutting off the water to replace pipes.*

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.

I was evacuated from my home on 1/1/13 and never returned to my home until 1/11/13 because of the water & gas situation, the strong odor of gas leaks outside my residence which I own. I had to take my mortgage payment and pay for hotel stay for myself, my 8 yr old granddaughter, 3 months old grand daughter, they should reimburse me for hotel fees, eat fees & trucking on my property, and also for stress of leaving my home, plus not being reassured my property is safe for

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.

living because of the damage to the streets, pipes, and still sink holes open

6. Protection from Abuse

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 for 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

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.

*They informed me I should contact the city  
When I did, I wasn't given any help!*

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 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

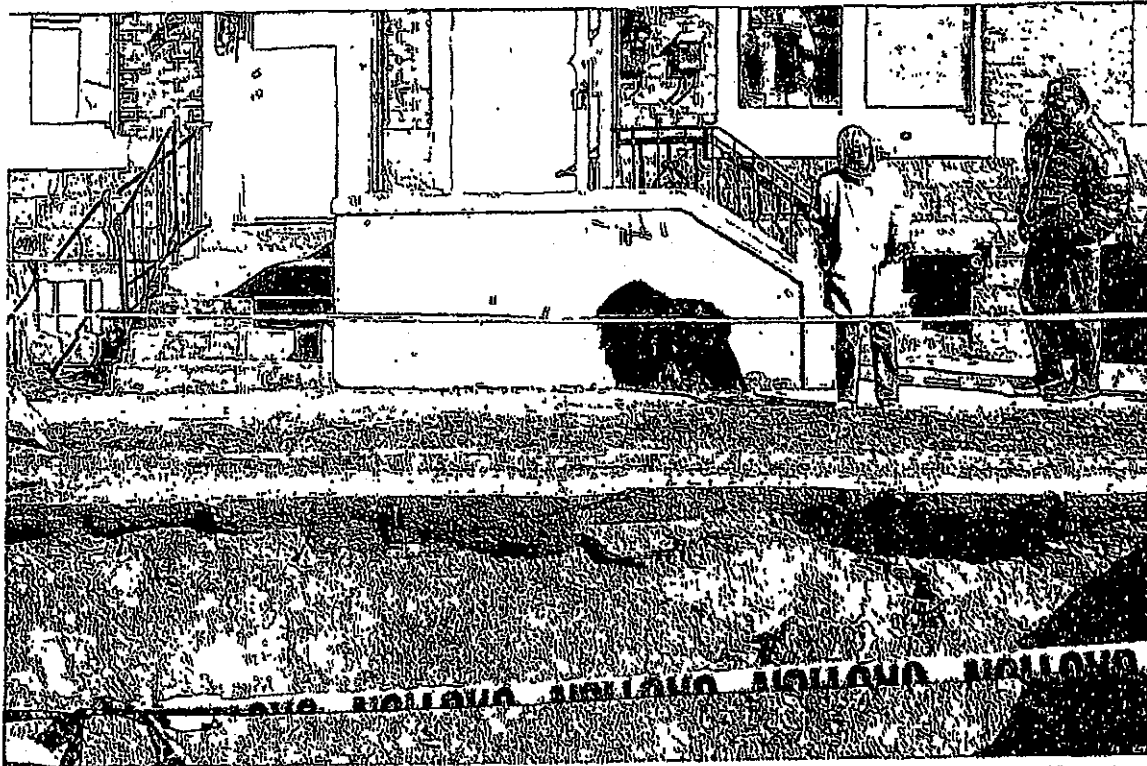
You must sign your complaint. Individuals filing a Formal Complaint must print or type their name on the line provided in the verification paragraph below and must sign and date this form in ink. If you do not sign the Formal Complaint, the PUC will not accept it.

# CAL & STATE

PENNLIVE.COM/MIDSTATE • THURSDAY, JANUARY 3, 2013 • A3

**HARRISBURG** | Residents blast city officials for lack of communication on sinkholes

## 'It's kind of scary'



MARK PYRES, PennLive.com

Residents pass by a large sinkhole in the middle of Harrisburg's Fourth Street as crew members work to repair the hole Wednesday afternoon. **BELOW:** The hole as it appeared on Tuesday.

BY ERIC VERONIKIS  
everonikis@pennlive.com

Dealing with no running water has been miserable, and Harrisburg resident Sharoun Davis said she had no idea she and her children could go to a shelter after two sinkholes shut down her block Monday.

Davis, 33, said the city has provided next to no communication to residents affected by the two sinkholes that ruptured gas, water and sewer lines in the 2100 block of North Fourth Street.

### MORE COVERAGE

Harrisburg's streets are poked with more than 40 sinkholes, but drivers don't need to be concerned **PAGE A4**

dents who were asked to voluntarily leave the block while city crews repair water and sewer lines.

Gas service has returned, but it could take a week until residents living near the sinkholes have running water again.

As city crews dug deeper into the second crevasse Wednesday, the smell of sewage permeated the block.



# Smaller sinkholes in Harrisburg aren't rare or dangerous

BY ERIC VERONIKIS  
everonikis@pennlive.com

As drivers pass over steel plates on Harrisburg streets, they are driving over what essentially are sinkholes, said Kevin Hagerich, the city's director of public works. Sinkholes are not new to Harrisburg, but the two that collapsed into the 2100 block of North Fourth Street on Monday are the biggest.

There are 40 steel plates covering smaller sinkholes in Harrisburg, Hagerich said.

Even though residents said they were frightened by Monday's street collapse, drivers need not be alarmed, Hagerich said.

"This was a freak occurrence," Hagerich said of the two sinkholes close to each other. "I don't know if it's good news or bad news, but our garbage trucks go up every street, every week. They're a little bit heavier than a car. If you are in a car, the odds of something happening are a lot less. The plated areas are probably the most cautious areas, I'd use the most caution at."

"I would have to categorize [holes covered by steel plates] as sinkholes. Something caused that pothole or that dirt to go somewhere. Typically, it is an undermined water system or it could be an old pipe."

A more than 100-year-old leaky water main made of clay caused erosion under the street and led to Monday's collapse, said Robert Philbin, spokesman for Mayor Linda Thompson.

In fact, much of the 160 miles of water and sewer lines crisscrossing the city's underbelly are more than 100 years old and in disrepair, he said.

The cash-strapped city hasn't had enough money to keep up with repairs during the past 20 years, and sinkholes and other problems are the result, Philbin said.

"The main trigger is a water leak that causes erosion under it. The pipe in this area was laid in the late 1890s. It's clay pipe," he said. "Any city that has infrastructure

over 100 years old is going to have these types of problems. It's a matter of strategy for maintenance."

Harrisburg will have to deal with fixes on a case-by-case basis, but the Public Works Department hopes to use a camera to act like a snake and inspect which lines need the most work, Hagerich said.

Gas service has been returned to homes affected by the sinkholes, but water might not run again in the 2100 block of North Fourth Street until next week, Thompson said.

The cost of this week's repairs are unknown, but money from the city's sewer and water funds will be used to cover the expense, she said.

The city is relying on outside contractors to rebuild the broken sewer and water lines on North Fourth Street, which is closed between Maclay and Woodbine streets, she said.

The contractors have to bid on pipelines and other materials needed to fix the water and sewer lines.

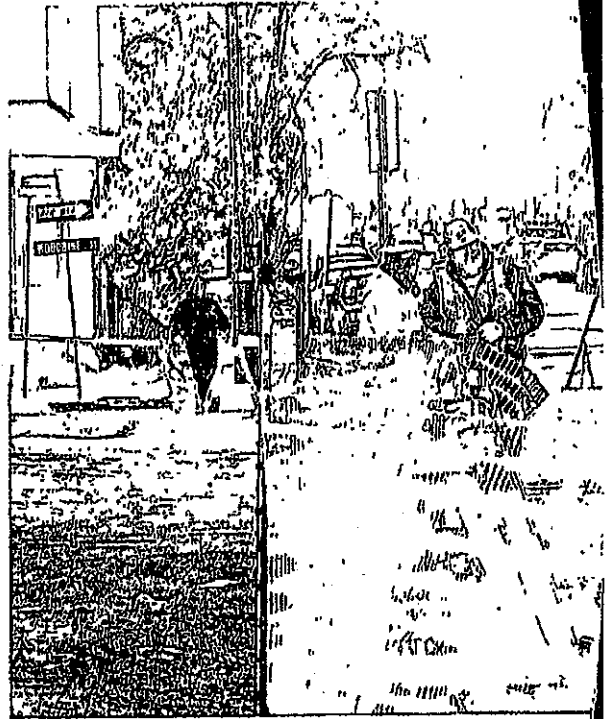
Until Harrisburg can return to solvency and borrow enough money to rebuild its maze of sewer and water lines, city crews will have to continue patching problems, Thompson said.

The North Fourth Street repairs are going to take time, and Thompson said she is aware of the inconvenience this has caused residents.

"Our people here in the neighborhood probably will not have their water restored, I'm saying at best maybe Monday or Tuesday of next week. We're doing all that we can do," Thompson said.

"We have to do these quick fixes and ensure the fixes are going to sustain, particularly when you talk about disrupting families. What a time. Here it's the first of the new year and families are being displaced. So our main concern is to get the families out of here so we can quickly get the work done and then get them back in their homes as quickly as possible."

City crews backfilled most of the first sinkhole with dirt and gravel.



Crews work to repair a sinkhole in Harrisburg. The American Red Presbyterian Church at 234 South St. for residents who were asked to shelter at the Pine Street Presbyterian Church while city crews repair water and sewer lines.

## SINKHOLES

Continued from Page A3

"We really don't have anywhere else to go. We're not really sure as to what other shelter options are out here," Davis said. "[The city] hasn't told us anything. The only thing the city has really told us, they rang our doorbell to inform us that our water was going to be off. That's it."

"When they first started opening [the first sinkhole] we got the sense of smelling gas," she added. "We're upstairs, so you can kind of feel the entire ground shake at times. It's kind of scary."

Latarsha Richardson chose to stay in her house because she doesn't want to have her family camp out at a shelter.

Richardson, 31, said the city has not done enough to help residents who stayed in their homes.

She said she hoped the city would help provide bottled water and heaters to residents who stayed.

"It's been very hard without the water and heat. I have seven kids in my house. But I'm not taking my kids to no shelter. I don't

"We really don't have anywhere else to go. We're not really sure as to what other shelter options are out here. [The city] hasn't told us anything. The only thing the city has really told us, they rang our doorbell to inform us that our water was going to be off. That's it."

SHARUN DAVIS, Harrisburg resident

trust everybody," Richardson said. "I don't want my kids around strange people. So I decided to stay here where I pay almost a month [in rent]. I think it's a shame that all this happened, and no one has to suffer, the whole block

January 28, 2013

To Pa. Public Commission,

I am send a newspaper contact so that you can see how the streets are still untravable today from 1/1/13, they still have holes and openings in our streets. People had their home vandalized, broken in and robbed, as well as pipes stolen. I have lived in my home for 45 years and am afraid that our homes are not stable due to the bursting of those pipes under ground.

I saw the hollow holes and this has been very disturbing for myself and others in this block to deal with. My bond broke whenever they're here working outside. I feel we the people of this block deserve some type of financial settlement from both PPL and WGT and also the city of Abz.

Sincerely Yours  
Thomas White

**Verification:**

Thomas White, 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).

Thomas White \_\_\_\_\_ 1-24-13  
(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. Filing**

You may electronically file your Formal Complaint with the PUC. To do so, you need to establish an account on the PUC's eFiling system, which may be accessed at <http://www.puc.pa.gov/efiling/default.aspx>.

If you do not electronically file your Formal Complaint, mail the completed form (along with any attachments) to one of the addresses listed below:

If using U.S. Postal Service:

If using overnight delivery service:

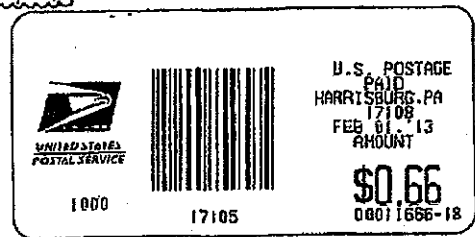
Secretary Pennsylvania Public Utility Commission P.O. Box 3265 Harrisburg, PA 17105-3265	Secretary Pennsylvania Public Utility Commission 400 North Street Commonwealth Keystone Building, 2 <sup>nd</sup> Floor Harrisburg, Pennsylvania 17120
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Note: Formal 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.

Thomas White  
2147 N 4th St.  
Hbg. Pa. 17110



RECEIVED

2013 FEB -4 AM 12:03

PA. P.U.C.  
SECRETARY'S BUREAU

Secretary  
Pennsylvania Public Utility Co.  
PO Box 3265  
Harrisburg Pa. 17105-3265

BEFORE THE  
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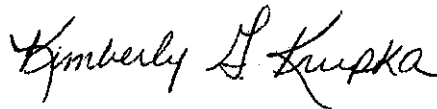
NO. C-2013-2347776

**CERTIFICATE OF SERVICE**

This is to certify that the PRELIMINARY OBJECTIONS OF PPL ELECTRIC UTILITIES CORPORATION on behalf of PPL ELECTRIC UTILITIES CORPORATION was mailed to counsel/complainant of record THOMAS AND WILLIE MAE WHITE, on behalf of Respondent by first class United States mail, postage on this the 6<sup>th</sup> day of March 2013.

THOMAS AND WILLIE MAE WHITE  
2147 N. 4<sup>TH</sup> STREET  
HARRISBURG, PA 17110

GROSS MCGINLEY, LLP



By: \_\_\_\_\_

KIMBERLY G. KRUPKA, ESQUIRE  
I.D. # 83071

Attorney for Respondent  
PPL Electric Utilities Corporation  
33 South 7<sup>th</sup> Street, P.O. Box 4060  
Allentown, PA 18105

Phone (610) 820-5450; Fax (610) 820-6006