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May 29, 2013

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: Tracey Andrews v PPL Electric Utilities Corporation
Docket No.: C-2012-2304551

William Andrews v PPL Electric Utilities Corporation
Docket No.: C-2012-2300410

RECEIVED
2013 JUN -5 AM 10:24
PA.P.U.C.
SECRETARY'S BUREAU

Dear Secretary Chiavetta:

Enclosed for filing on behalf of the Complainants is an Affidavit of the Complainants. Copies of same will be provided as indicated on the Certificate of Service.

Respectfully Submitted,


Jeffrey A. Levine, Esquire

JAL/dmb

Enclosure

Cc: Jessica R. Rogers, Esquire

Honorable Susan D. Colwell (scolwell@pa.gov)

Herbert R. Nurick (hnrick@pa.gov)

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Tracey Andrews,
Complainant,

v.

PPL Electric Utilities Corporation,
Respondent,

William Andrews,
Complainant,

v.

PPL Electric Utilities Corporation,
Respondent

Docket No. C-2012-2304551

Docket No. C-2012-2300410

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**AFFIDAVIT OF TRACEY ANDREWS
AND
WILLIAM ANDREWS**

I, Tracey Andrews and William Andrews, hereby depose and say as follows:

1. I, Tracey Andrews and William Andrews, my husband, being duly sworn according to law, depose and say that we are making this Affidavit jointly on behalf of ourselves as Complainant in the above Action.

2. Since the time we have purchased this land, it was originally used as a parking lot for our catering business located across the street known as Squeeky's Bar.

3. Shortly after we originally purchased the property, we began contacting PPL regarding two guide wires anchored in the property, requesting

that they move the two guide wires as we deemed them to be a safety concern. Since that time, PPL has refused to move the wires.

4. PPL has been contacted over the past thirty years on a number of occasions, with no response, requesting that they trim the trees in the area around the PPL guide wires. Finally, after having filed a Complaint with the Public Utilities Commission, PPL agreed to trim the trees.

5. Throughout the time period we have owned the property, we have requested on a number of occasions that PPL move the guide wires so that we could make better use of our property. However, they have continuously refused to do so.

6. Throughout the time period we have owned our property, PPL has increased the voltage on the lines running across our property without requesting our permission to do so, despite the fact they have no written agreement that allows them to place either the wires upon our property and/or change the voltage on said wires. All of which has created tremendous safety concerns for us.

7. Throughout the time we have owned these properties, PPL has been requested to move the guide wires and wires across our property so that we could make better use and add improvements to my property, allowing my family greater use of the property; however, such plans have been significantly diminished due to the safety concerns regarding these guide wires running across my property. PPL has allowed access to my property illegally by allowing the telephone company and cable company use of the poles and guide wires

which run across our property, despite the fact that they have no written agreement with us which allow such conduct and all of which has increased the danger to our family from the increased use of the wires, poles and guide wires which run on our property.

Respectfully Submitted:

Tracey Andrews
Tracey Andrews, Complainant

William Andrews
William Andrews, Complainant

Date: 5-28-2013

Subscribed and sworn to
Before me this 28th day
Of May, 2013.

Scott A. Herlands
Notary Public

COMMONWEALTH OF PENNSYLVANIA
NOTARIAL SEAL
Scott A. Herlands, Notary Public
City of Scranton, Lackawanna County
My commission expires February 28, 2014


VIA EMAIL

Honorable Susan D. Colwell
scolwell@pa.gov

Herbert R. Nurick
hnurick@pa.gov

Respectfully Submitted:
HERLANDS & LEVINE

BY: _____


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