

March 9, 2015

From: Yanling Chen and Jianming Hu
1126 Chadwick Circle
Hummelstown, PA 17036

To: Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor
Harrisburg, PA 17120

Re: Docket No. C-2013-2397061

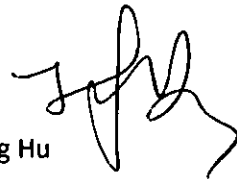
Dear Secretary Chiavetta:

Attached are two copies of the Complainants' Exhibits 1 through 3 for submission to the Commission's Secretary's Bureau to be included in the official record, based on the order issued on March 3, 2015 by Pennsylvania Utility Commission Administrative Law Judge Joel H. Cheskis.

Very truly yours,



Yanling Chen & Jianming Hu



CC: Administrative Law Judge Joel H. Cheskis

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February 12, 2015

From: Yanling Chen and Jianming Hu
1126 Chadwick Circle
Hummelstown, PA 17036

To: Administrative Law Judge Joel H. Cheskis
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor
Harrisburg, PA 17120

CC: Brian C. Wauhop, Esquire
409 North Second Street, Ste. 500
Harrisburg, PA 17101-1357

Re: Docket No C-2013-2397061

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Your Honor,

We are writing to request a late filing for additional exhibits to be considered and included in the recent (January 14, 2015) hearing record. Some questions were raised during the hearing without getting answered and the answers to those questions only came after further investigation. In addition, the company interpreted the easement in their favor, without any valid basis, at the hearing. We hadn't planned to emphasize the easement issue at the hearing since we had been told that the Commission doesn't have jurisdiction over easement issues. We believe it's necessary to clarify the easement issue so that the company's misinterpretation won't be taken as fact. Therefore, we would like to have the following three exhibits and information considered in addition to the originally submitted attachments A through F.

Exhibit 1. The company's interpretation of the easement width was based on their hand-drawing. However, the hand-drawing doesn't have any date, signature or seal on it, and doesn't match any record we have from the Office of Derry Township Community Development or the Dauphin County Courthouse. Obviously, it is not a valid document. It was confirmed to be wrong (see original attachment C submitted earlier). The company argued that there was a "95 feet" mark on the second page attached to the official easement. There are actually three plans (R-20-22-L, R-20-23-L and R-20-25-L) drawn on that page (BookC Vol13Page573). It is unclear what the 95 feet refers to. Our plan is R-20-23-L, which is 90 feet, as clearly marked on the second page and indicated on the first page (BookC Vol13 Page572) of the official easement.

Therefore, the company's interpretation of "95 feet" is not based on any official documentation. In addition, the company presented us the hand-drawing, claiming it was the easement, only after our repeated requests for their justification to remove our trees. If there is nothing to hide, why didn't they honestly show the actual easement record to us? What kind of business ethics is this? If the company thinks the easement record in the Dauphin County Courthouse is incorrect, why didn't they follow the proper procedure and go through the legal process to resolve this issue? My trees were removed by the company at 15 feet tall, far away from their mature size. The company would have plenty of time to resolve the easement issue if they wanted.

Mr. Wirs from the company also claimed at the hearing that he gave us the opportunity to relocate our two trees, as the company did to our next door neighbor, whose trees are closer to the power line and are still standing. However, we were never given this opportunity; in fact, the only time that the company even mentioned tree relocation to us was at the Commission hearing.

Exhibit 2. The company claimed they had a survey done by their certified surveyor. They have not shown us the survey yet even after our repeated requests. Mr. Wirs agreed to let us know when they did their survey so we could be present, but he never told us when the survey was done. Although Mr. Wirs tried to deny at the hearing that he had agreed to that but we remember that clearly. Indeed, we still do not even know to this day if the company has done the survey they claimed or not. After we filed a Formal Complaint, the Company promised to have a survey done in order to get another continuance request granted. The "survey" that the company provided to us after that is identical to the original survey we got from the Dauphin County Courthouse. The black line is from the original survey. The company simply moved the official easement boundary line five feet toward our property and placed our two trees (marked in green) inside their so-called "easement line" (see the line in red).

Exhibit 3. The company was asked at the hearing about the height of the power line and their answer was that they were not sure. We therefore conducted some calculations ourselves after the hearing. Our calculations further prove that our two trees, even at the mature size and in the worst case scenario, won't affect their power line.

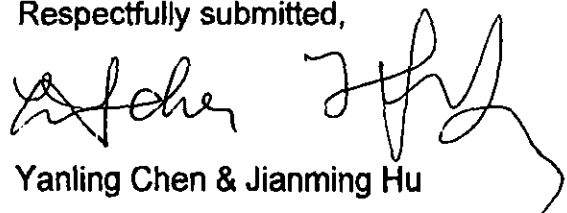
The above information further approves that the Company has failed to conduct the Vegetation Management in a reasonable, fair and honest manors. We greatly appreciate your consideration and patience.

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Respectfully submitted,



Yanling Chen & Jianming Hu

REC'D VOL 1388572

INDENTURE, made this 22nd day of FEBRUARY, 1962, by and between BRUCE R. ZELL AND MARGARET M. ZELL, HIS WIFE

of the TOWNSHIP of BERRY County of DANBURY and Commonwealth of Pennsylvania (hereinafter called Grantors), and METROPOLITAN EDISON COMPANY, a Pennsylvania corporation (hereinafter called Grantee),

WITNESSETH, that in consideration of the sum of One Dollar (\$1.00) received from Grantee, and the additional sum hereinafter set forth, Grantors hereby grant and convey to Grantee, its successors and assigns, the easement and uninterrupted right from time to time to place, erect, construct, install, use, operate, patrol, inspect, maintain, repair, reconstruct, remove, add to, relocate and remove at will, facilities, including poles, pole structures, towers, cross arms, underground and overhead wires, cables, anchors, guys, attachments, equipment and appurtenances for the transmission and distribution of electricity on, over, under and across all that certain MINUTE (90') foot wide strip

of Grantors' lands as shown on Grantee's Plan No. 10-22-22-4, which is attached hereto and made a part hereof, situate in the TOWNSHIP of BERRY County of DANBURY and Commonwealth of Pennsylvania;

Together with the right from time to time to clear and entirely remove everything, including buildings, from the said strip of land and also from time to time the right to trim, cut or remove trees adjacent to the said strip of land that may, in the judgment of Grantee, interfere with or endanger the aforesaid facilities; together also with the right of access over Grantors' lands to the said strip of land provided, however, Grantee shall pay any damages it causes to fences and crops.



The additional sum above referred to is TWENTY FIVE THOUSAND AND 00/100 Dollars (\$25,000.00) and if said sum is not paid or tendered by Grantee within THIRTY (30) DAYS from the date hereof, which time is of the essence, the easement and rights herein granted shall, without further act by the parties herein, cease and terminate, and neither party shall have any further obligation to the other party by reason hereof.

The words "Grantors" and "Grantee" shall include their heirs, executors, administrators, successors and assigns, as the case may be.

IN WITNESS WHEREOF, Grantors have duly executed this indenture the day and year first above written.

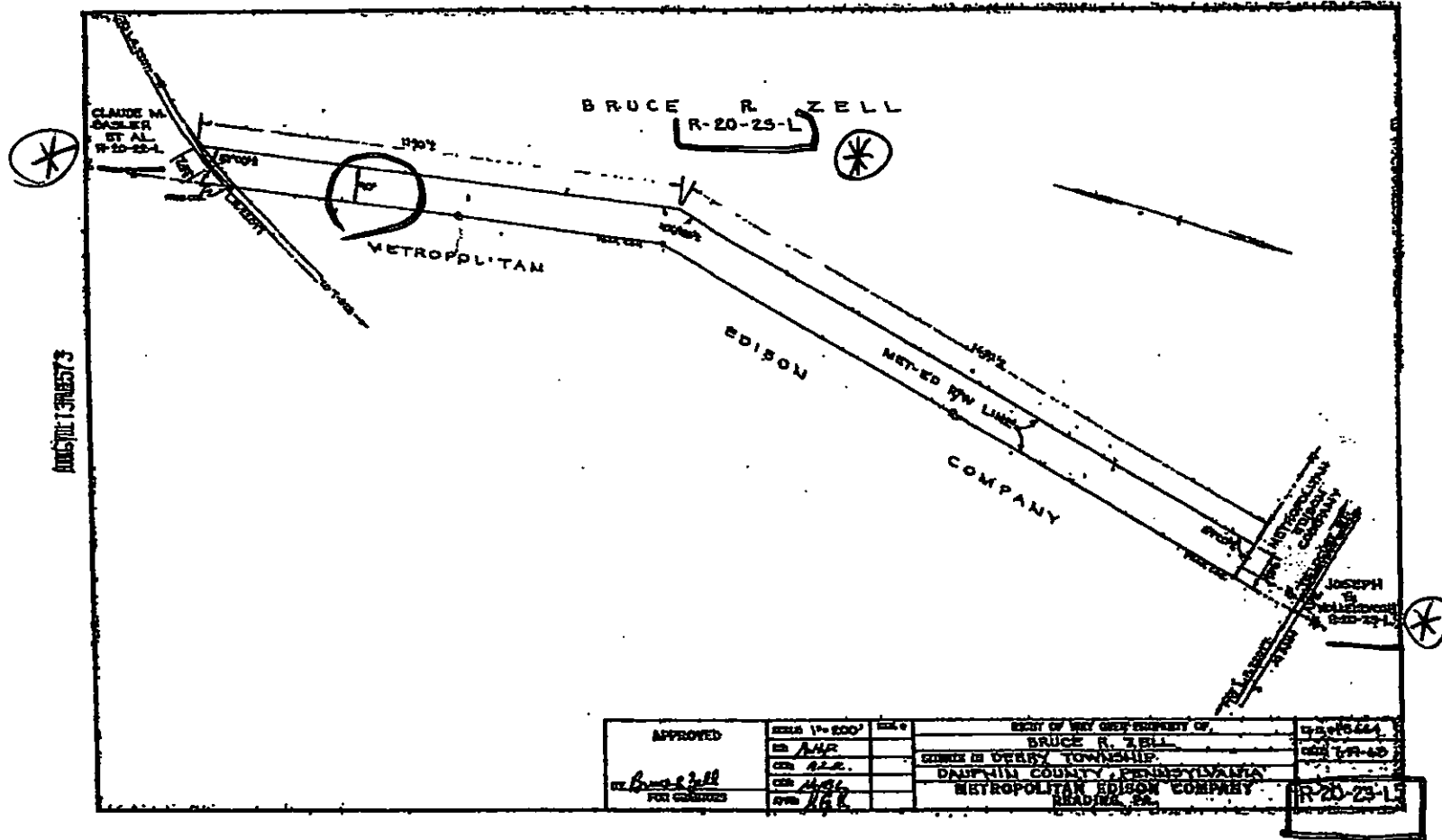
Witness: George A. Hunter Bruce R. Zell [SEAL]
Margaret M. Zell [SEAL]
[SEAL]
[SEAL]

Received this 14th day of August, A.D. 1962, of the above named Grantee the additional sum above mentioned in full.

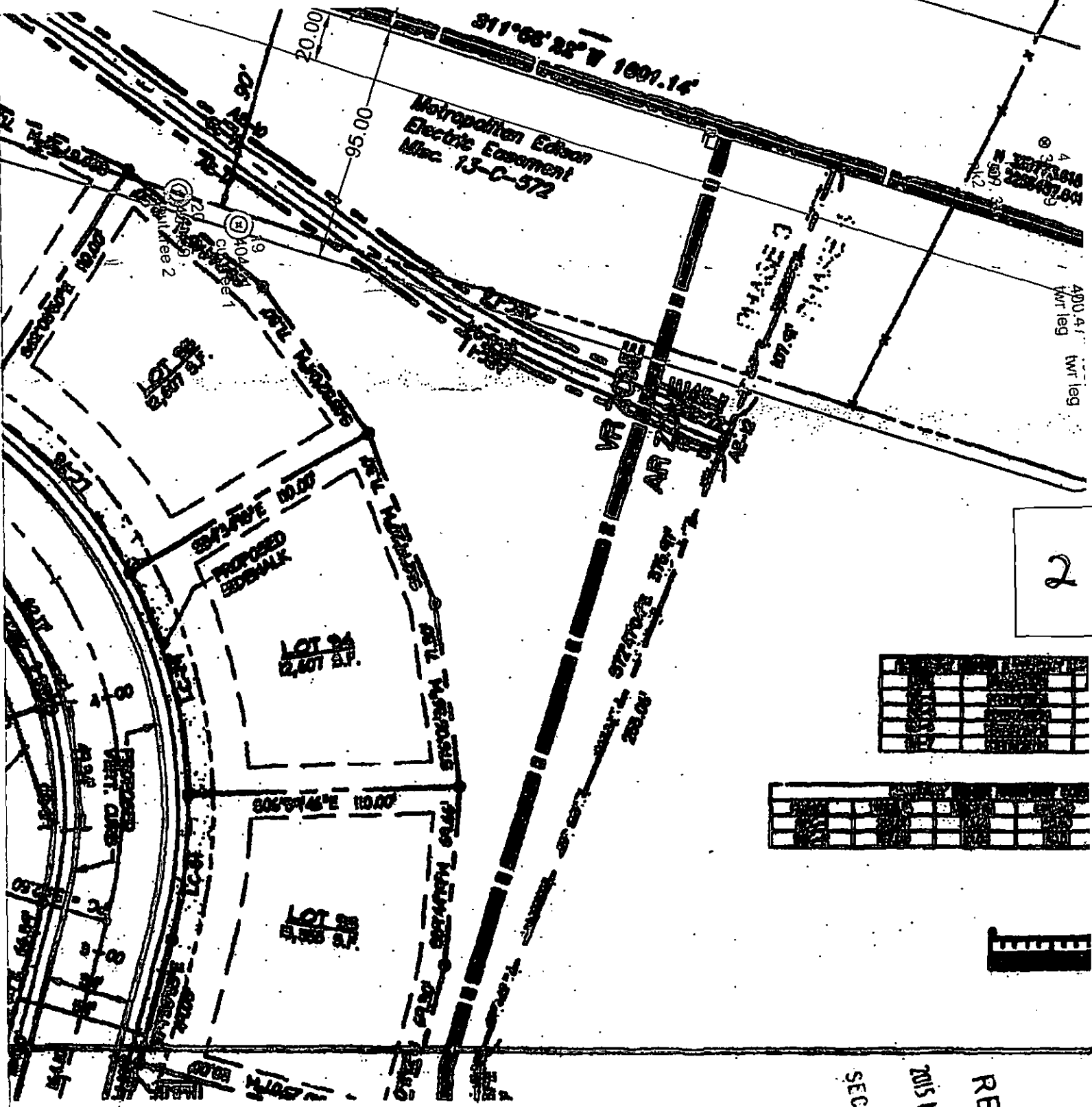
Witness: George A. Hunter Bruce R. Zell
Margaret M. Zell
RBH

WP-22 6-57

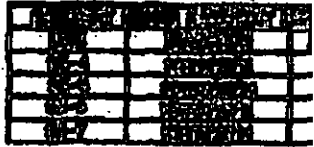
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APPROVED	SCALE 1" = 200'	DATE	RIGHT OF WAY GRANT PROPERTY OF	11702-224
<i>Bruce R. Zell</i>	BY <i>A.M.R.</i>		BRUCE R. ZELL	11701-45
FOR CONTRACT	BY <i>A.L.L.</i>		OWNER IN GERRY TOWNSHIP	
	BY <i>A.L.L.</i>		DAUPHIN COUNTY PENNSYLVANIA	
	BY <i>A.L.L.</i>		METROPOLITAN EDISON COMPANY	
	BY <i>A.L.L.</i>		READING, PA.	R-20-25-L



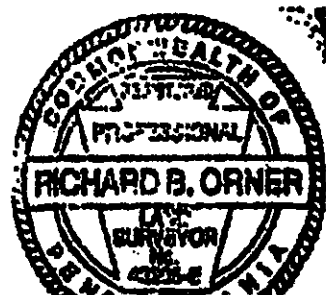
2



for approval by the
Commissioners this _____

I hereby certify this survey to be
correct as shown

I hereby certify this plan
correct as shown



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by the Derry Township Supervisors

131B
38 S.F.
SPACE

S11°58'22" W 1601'

Metropolitan Edison
Electric Easement
Misc. 13-C-572

LOT 96
12,607 S.F.

WATER
EASEMENT

my
property

VR ZONE

PROPOSED
SIDEWALK

LOT 94
12,607 S.F.

PROPOSED
SIDEWALK

CLEAR SIGHT
EASEMENT

PROPOSED
VERT. CURB

LOT 104
2,627 S.F.

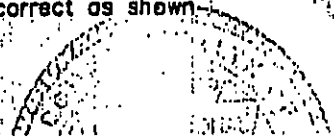
LOT 93
13,355 S.F.

This was
recorded
in the Dauphin
County Court house

plan recommended for approval by the
ry Township Planning Commission this _____
of _____ 20 _____

I hereby certify this survey to be
correct as shown

Irman _____

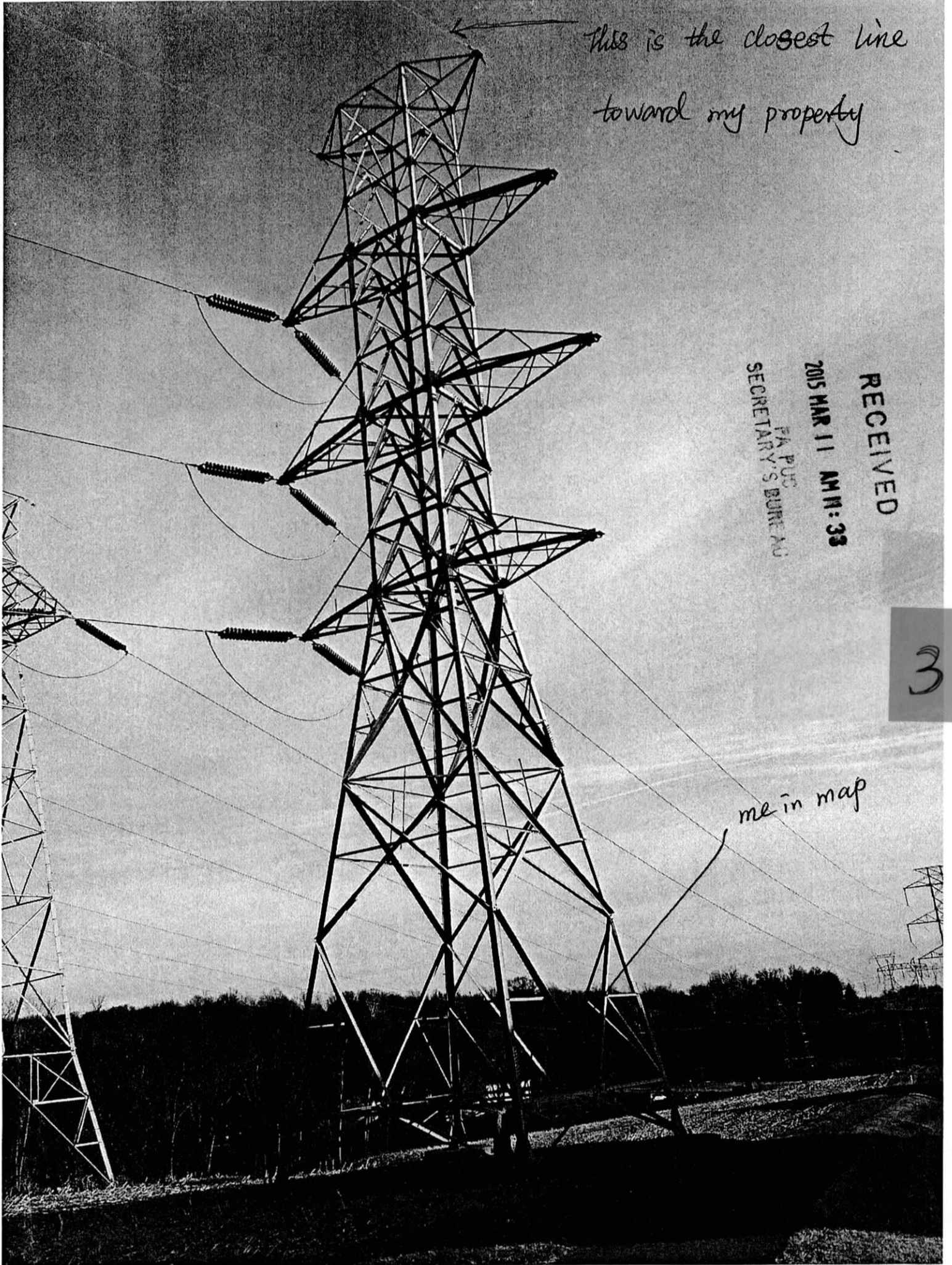


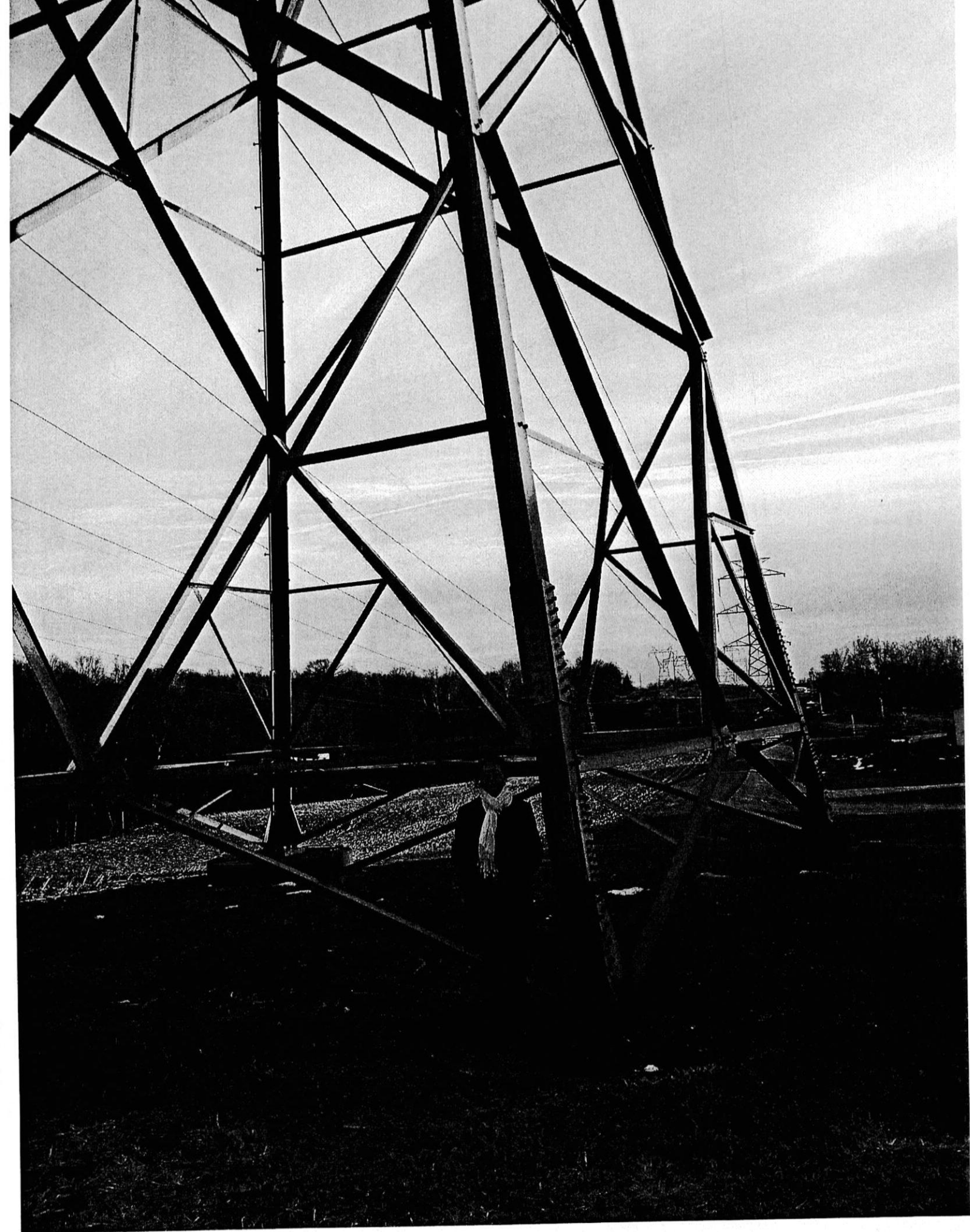
This is the closest line
toward my property

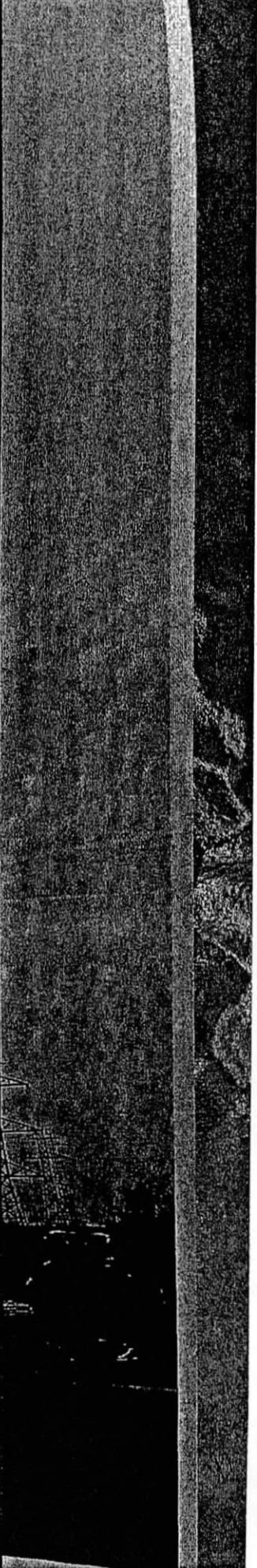
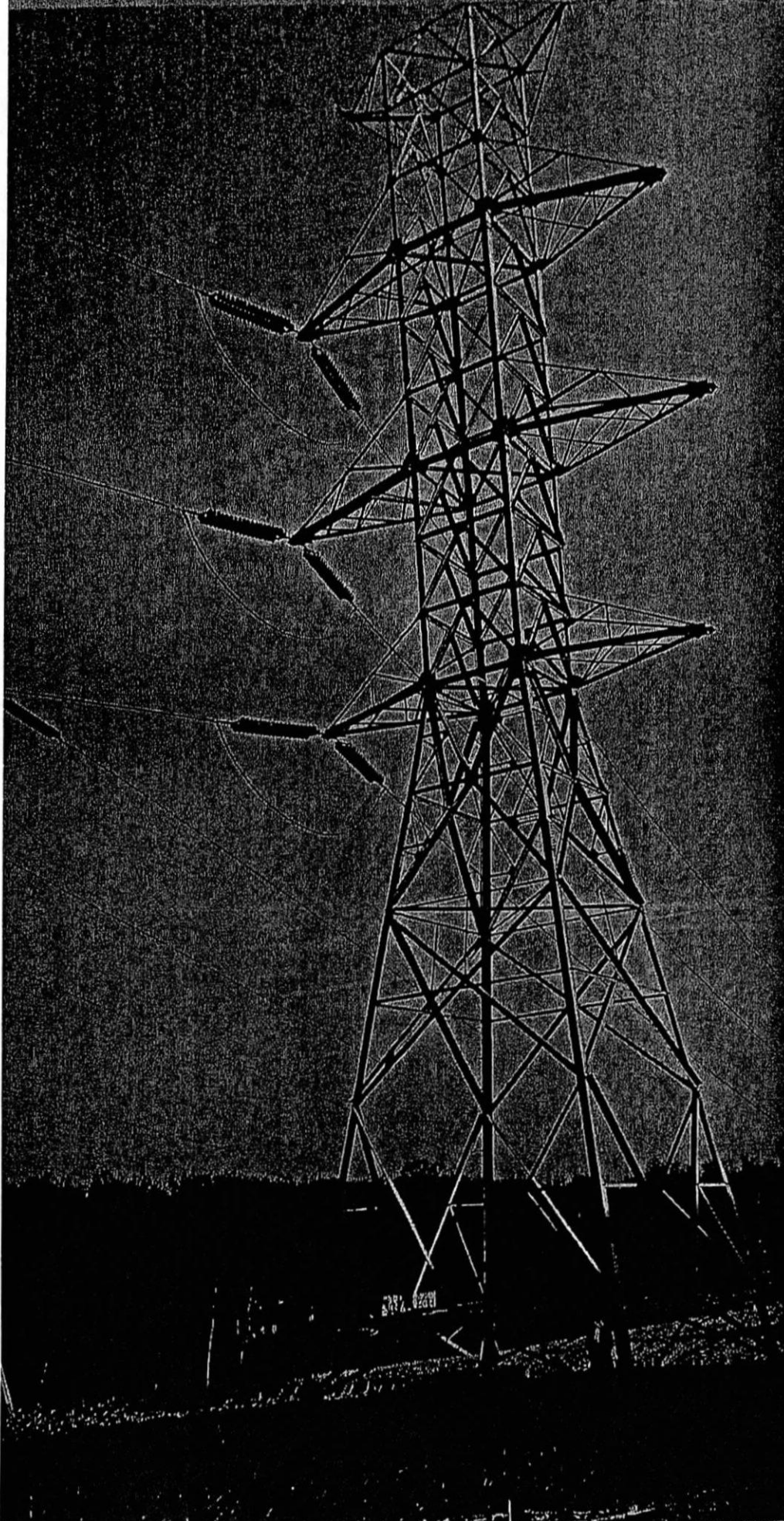
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3

me in map







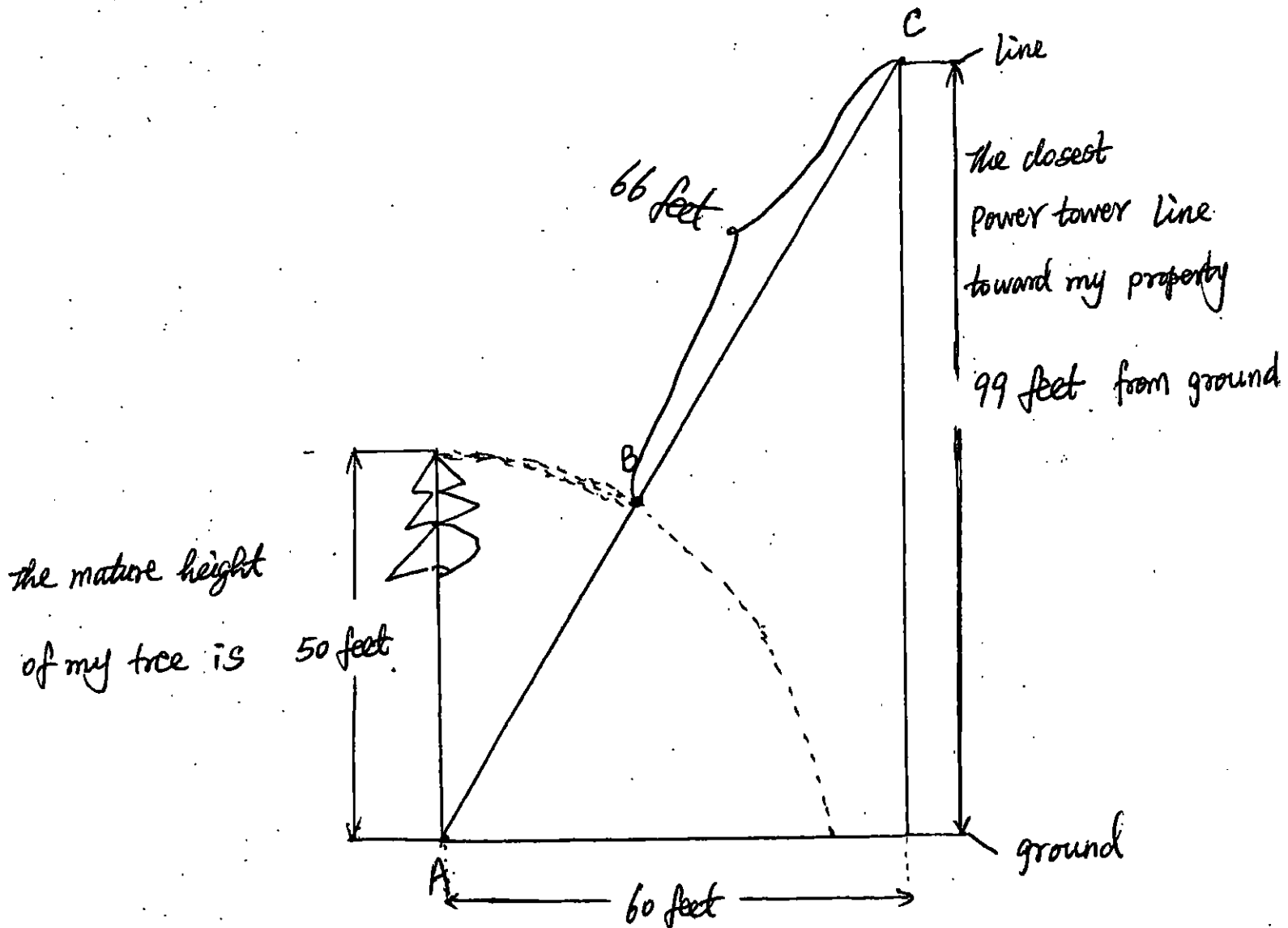
My actual height is 66 inches

My height in map is 0.5 inch.

The height of the closest power tower toward my house in the map is 9 inches.

Therefore, the power line closest toward my property is about 99 feet from ground.

$$66 \cdot 9 / 0.5 / 12 = 99 \text{ feet}$$



The distance $\overline{AC} = \sqrt{60^2 + 99^2} = 116$ feet

If the tree falls, the closest distance between the tree and the line would be

116 feet - 50 feet = 66 feet, illustrated as the distance between point B to point C

Yanling Chen
1126 Chadwick Cir
Hummelstown, PA 17036

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