

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

MELVIN D. WILLIAMS,  
Complainant,

vs.

DUQUESNE LIGHT COMPANY,  
Respondent.

No: C-2014-2446701

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*Reply To* EXCEPTIONS OF  
DUQUESNE LIGHT COMPANY

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Melvin D. Williams

1119 North Lang Avenue

Pittsburgh, PA 15208-1458

July 27, 2015

RE: Melvin D. Williams v. Duquesne Light Company

Docket No. C-2014-244670I

Dear Secretary Chiavetta:

Melvin D. Williams' Reply to Respondent's Exceptions are enclosed for filing. A copy of this document has served upon Respondent in accordance with Commission regulations.

Melvin D. Williams

Complainant

*Melvin D. Williams*  
Enclosures *Melvin D. Williams*

cc: Jeremy A. Farrell (with enclosure)

*Aug 3, 2015*

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Complainant is 82 years old. A fall on his sidewalk can have serious health complications that led to death. Respondent has repeatedly requested Respondent to consider this and the threat to the public on this busy avenue.

Complainant has ca. 140 linear feet of sidewalk at this property. The only destroyed slab is adjacent to the worksite of the Respondent. This destruction was caused by the concrete saw and jackhammer of the Respondent in a effort to limit restoration to a limited area as possible. The jackhammer caused the ¾ inch raise to the adjacent slab and shattered its surface. The saw cut into another adjacent slab that had no prior damage. The Respondent even refused to remove the debris after several requests and continues to refuse. The Respondent refused to meet with Complainant to even discuss the problem until a Complainant was filed with the PUC and that meeting resulted in no action and no discussion of resolution or compromise.

Respondent's Exception is an effort to justify its unreasonable bad behavior with meaningless language such as "almost immediately" (P. 23) and "courtesy" (p. 19, 20, and 23) for repairs to damage created by Respondent.

The repeated claims of inspections and visits are not documented, noticed, or witnessed by Respondent and even it true they resulted in no action or attempts to compromise with the Complainant. Mr. Barrett's one brief meeting contained no agreements (p. 17) but he was report back to his superiors for any action to come. Respondents did not immediately investigate (p. 18) but took months and came only complaints were filed.

The Respondent accuses ADL Johnson of Error (p. 19) on the subject of remedial efforts. But they knew or should have known that this remedial effort was gross negligence because the saw crack in the slab would admit water that would freeze and thaw during winter and eventual destroy the slab. They demand evidence of this but this is common knowledge that has Judicial Notice.

The Respondent claims to have "reported its findings to a Mr." There is a typographical error here but no findings were reported to Complainant in "two days" or ever (p.17). Complainant was ignored throughout this process.

The AL's assessments of the Respondent's bad behavior and bad intent in this poor African-American neighborhood are accurate and fair. There is intentional misconduct here.

Melvin D. Williams  
Melvin D. Williams

Aug 3, 2015

**CERTIFICATE OF SERVICE**

I hereby certify that I have this day served a true copy of the foregoing document upon the participants listed below in accordance with the requirements of 52 PA. Code § 1.54 (relating to service by a participant):

Melvin D. Williams  
1119 North Lang Avenue  
Pittsburgh, PA 15208  
(Via U.S. Mail)

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JUL 27 2015

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SECRETARY'S BUREAU

Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
P.O. Box 3265  
Harrisburg, PA 17105-3265  
(Via Electronic Filing)

Pennsylvania Public Utility Commission Office of Special Assistants  
(Via email at: ra-OSA@pa.gov)

Dated this 20<sup>TH</sup> day of July, 2015

  
\_\_\_\_\_  
Jeremy V. Farrell, Esq.  
Counsel for Respondent  
Duquesne Light Company

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*Melvin D. Williams*  
*Melvin D. Williams*

*Aug 3, 2015*

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