

RECEIVED
2016 JAN 21 AM 9:53
PA.P.U.C.
SECRETARY'S BUREAU

January 18, 2016

Mr. Gerald B. Naylor
14481 Ardara Road
North Huntingdon, PA 15642

Rosemary Chiavetta, Esquire
Secretary
PA Public Utility Commission
Commonwealth Keystone Building, 2 North
P.O. Box 3265
Harrisburg, PA 17105-3265

Re: Docket No. C-2015-3514330

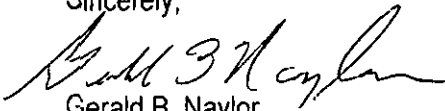
- Gerald Naylor v. West Penn Power Company
- p. 2 Response to the Preliminary Objection of West Penn Power Company
- p. 3 Response to the New Matter presented by West Penn Power Company

Dear Secretary Chiavetta,

This is my Notice to Plead along with my response to the Preliminary Objection and the New Matter presented by West Penn Power Company. If there is something else I must comply with please let me know.

If there is to be a hearing, must I be there? If so, I will have to make some arrangements ahead of time. I am 80 years old and it would be a problem for me to drive there.

Sincerely,


Gerald B. Naylor

Cc: Margaret A Morris, Esq. Reger Rizzo & Damall LLP

January 18, 2016

PA PUC Docket No. C-2015-2514330

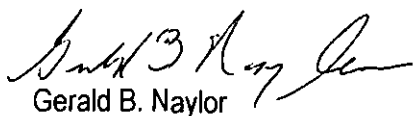
RESPONSE TO THE PRELIMINARY OBJECTION OF WEST PENN POWER COMPANY

My reason for bringing before the Public Utilities Commission the issues I have with the West Penn Power Company was to have them affirm my perception that the afore mentioned company is responsible for the damages to my property, not to have them award monetary damages.

There are three companies involved and none of them is being accountable for my losses. It is my inference that West Penn Power Co. is the one responsible for the damages for these reasons:

1. They supplied the power that caused the damage.
2. The abnormal surge occurred at the time when a repairman engaged by WPPCo put a jumper on the neutral and completed the circuit. When their repairman got there my wife was washing clothes. I told her to turn the washer and drier off until the repairman fixes the wire. After he installed the copper jumper to the neutral, he said, "Everything is O.K.." I told my wife she can continue to wash the clothes. When she turned the washer and drier on, only the drier worked. A week later when a service man had repaired the washer, he said it looks like it was damaged by a power surge. Another service man that repaired the air conditioner and furnace wrote on his receipt that the damage was done by a power surge.
3. West Penn Power was negligent for not instructing the repairman to have me, as a precaution, throw the main switch at the fuse box in my house. Had he done that, the surge would have gone to ground and there would have been no damage. It is hard to conceive that this is the first time in WPPCo records that an abnormal power surge occurred when such a repair had been made at a private home.

West Penn Power claims the damage was the result of a crew from Parkside Utility breaking the neutral when they moved the cables to the new pole. Parkside Utility is a company contracted by Verizon for field work. I concur that Parkside could be at fault for breaking the neutral line, but that happened two weeks prior to the surge that caused the damage. There were no power surges at the time the neutral was broken. We were having some difficulty with our phone service and it was a service man from Comcast that found the broken neutral. One of his connections had melted and he got shocked when he tried to disconnect it. The house ground was feeding current into the cable.


Gerald B. Naylor

RECEIVED
2016 JAN 21 AM 9:53
PA.P.U.C.
SECRETARY'S BUREAU

January 18, 2016

PA PUC Docket No. C-2015-2514330

RESPONSE TO THE NEW MATTER PRESENTED BY WEST PENN POWER COMPANY

A. There are three companies involved in my complaint. They are:

West Penn Power Company
800 Cabin Hill Drive
Greensburg, PA 15601
Mr. David W. McDonald, Regional President

Verizon Corporation HQ
140 West Street
New York, NY 10007
Mr. Anthony Melone,
Executive Vice-President and Chief Technology Officer

Parkside Utility
219 Ruth Road
Harleysville, P 19438

- B. Since these three companies cannot agree to the party responsible for the damages to my property I am asking the PA Public Utility Commission to step in and decide who is should be held accountable.
Making this decision is within the jurisdiction of the PUC
- C. I am not asking the PA PUC to issue a request for monetary compensation from any of these three companies. I realize that the PA PUC does not have the jurisdiction to do so. I only included the list of damages and losses I have sustained as background information regarding my claim.


Gerald B. Naylor

Gerald B. Naylor
14481 Ardara Road
N. Huntingdon, Pa.15642

PITTSBURGH PA 150

19 JAN 2016 PM 5 L



Rosemary Chiavetta, Esquire
Secretary, PA Public Utility Commission
Commonwealth Keystone Building, 2 North
P.O. Box 3265
Harrisburg, PA 17105-3265

17105326565

