

To: The Pa Public Utility Commission Secretary
400 North Street
Harrisburg, PA 17120

From: Ross E. Schell
203 Knollwood Drive
Harrisburg, PA 17109-5515
PH# 717-651-0824
Fax# same but call First.

C-2016-2565236

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In answer to answer From PPI's attorney dated 26 September 2016 .

First of all these are past the 10 days required to answer complaints. As per the secretary's servicing the complaint on utility. It was file 4 September 2016 To their answer does not conform to the 10 day answer period as stipulated by the secretary. They also do not conform

§ 1.11. Date of filing.

(a) Whenever a pleading, submittal or other document is required or permitted to be filed under this title or by statute, it will be deemed to be filed on one of the following dates:

(1) On the date actually received in the office of the Secretary.

(2) On the date deposited with an overnight express delivery service as shown on the express delivery receipt attached to or included within the envelope containing the document.

(3) On the date deposited in the United States Mail as shown by the United States Postal Service stamp on the envelope or noted on a United States Postal Service Form 3817 certificate of mailing. A mailing envelope stamped by an in-house postage meter is insufficient proof of the date of mailing.

(4) On the date stated on the confirmation of receipt from the Commission's electronic filing system, when the time shown is prior to 4:30 p.m. local prevailing time in the Eastern Time Zone (United States of America) and the date shown is a day on which the Commission offices are open. When a document is filed electronically when the offices of the Commission are closed, the document will be deemed to be filed at the time the offices next open.

(b) Failure to include a legible delivery receipt with a document submitted in accordance with the methods

4. On the 23 September 2016 my power went out for at least 6 minutes 3 time in a 24 hour period. I tried filing a complaint on this but the secretary keeps rejecting it. Enough said about this because nowhere in this law does it say they can interrupt my service at least 150 times over the last 12 years.

As far as a Third party power source. I live in Lower Paxton Township and they will not let me do any such thing. I do have battery back up on my phone system and my alarm clocks but other power options are to expensive for me to invest in . I do have surge suppressors on all electric out lets in my home for protection of my deivices. However there is no protection for the meter they installed outside so they might think of replacing it every time my power goes of and on because of the power serge that occurs when it comes back on. I have not complained about any device that was destroyed by the third world electric service I receive form PPL to the 1st world technology I have in my house.

But if they need and example my 3200 dollar fridge which was surge suppressed did go out because of the power failures I am experiencing its board burnt out because the surge suppressor could not handle the surge in electricity that came in to my house after one of these interruptions.

66 § 1501. Character of service and facilities.

Every public utility shall furnish and maintain adequate, efficient, safe, and reasonable service and facilities, and shall make all such repairs, changes, alterations, substitutions, extensions, and improvements in or to such service and facilities as shall be necessary or proper for the accommodation, convenience, and safety of its patrons, employees, and the public. Such service also shall be reasonably continuous and without unreasonable interruptions or delay. Such service and facilities shall be in conformity with the regulations and orders of the commission. Subject to the provisions of this part and the regulations or orders of the commission, every public utility may have reasonable rules and regulations governing the conditions under which it shall be required to render service. Any public utility service being furnished or rendered by a municipal corporation beyond its corporate limits shall be subject to regulation and control by the commission as to service and extensions, with the same force and in like manner as if such service were rendered by a public utility. The commission shall have sole and exclusive jurisdiction to promulgate rules and regulations for the allocation of natural or artificial gas supply by a public utility.

5 the relief I wrote on this complaint may be wrong but I deserve some kind of compensation due to the fact that I was paying for

electric service that violated the law. And inconvenienced my family really bad.

And if they want this complaint rejected they should file and objection of another type petitions for these complaints.

Ross E Schell

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§ 56.71. Interruption of service.

A public utility may temporarily interrupt service when necessary to effect repairs or maintenance; to eliminate an imminent threat to life, health, safety or substantial property damage; or for reasons of local, State or National emergency.

(1) *Interruption with prior notice.* When the public utility knows in advance of the circumstances requiring the service interruption, prior notice of the cause and expected duration of the interruption shall be given to customers and occupants who may be affected.

(2) *Interruption without prior notice.* When service is interrupted due to unforeseen circumstances, notice of the cause and expected duration of the interruption shall be given as soon as possible to customers and occupants who may be affected.

(3) *Notification procedures.* When customers and occupants are to be notified under this section, the public utility shall take reasonable steps, such as personal contact, phone contact and use of the mass media, to notify affected customers and occupants of the cause and expected duration of the interruption.

(4) *Permissible duration.* Service may be interrupted for only the periods of time as are necessary to protect the health and safety of the public, to protect property or to remedy the situation which necessitated the interruption. Service shall be resumed as soon as possible thereafter.

Character of service and facilities.

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Cross References. Section 1501 is referred to in sections 102, 1353, 2205, 2207, 2807 of this title.

§ 5.61. Answers to complaints, petitions, motions and preliminary objections.

(a) *Time for filing.* Unless a different time is prescribed by statute, the Commission, or the presiding officer, answers to complaints and petitions shall be filed with the Commission within 20 days after the date of service.

(1) Answers to motions shall be filed within the 20 days provided by §§ 5.102 and 5.103 (relating to motions for summary judgment and judgment on the pleadings; and motions).

(2) Answers to preliminary objections shall be filed within the 10 days provided by § 5.101 (relating to preliminary objections).

(b) *Form of answers to complaints.* The answer must be in writing and: (1) Set forth in paragraphs numbered to correspond with the complaint. (2) Advise the parties and the Commission as to the nature of the defense. (3) Admit or deny specifically all material allegations of the complaint. (4) State concisely the facts and matters of law relied upon.

(5) Include a copy of a document, or the material part of a document when relied upon in the answer. If the writing or a copy is not available, the answer must set forth that the document is not available and the reason, and set forth the substance of the document.

(c) *Failure to file an answer to a complaint.* A respondent failing to file an answer within the applicable period may be deemed in default, and relevant facts stated in the pleadings may be deemed admitted.

(d) *Answers to complaints in rate proceedings.* For complaints which are docketed with Commission-instituted rate proceedings, an answer may be filed within 10 days of date of service.

However, an answer is not required, except as may be directed by the Commission or the presiding officer.

(e) *Form of answers to petitions.* The answer must be in writing and:

(1) Advise the parties and the Commission of the parties' position on the issues raised in the petition.

Certificate Of Service

I do hereby certify that I have that this 29 day of September I have served a True and correct copy of the answer to PPL's Answer to complaint Upon the person and manner Set Forth .

Via Fax

Kimberly Krupka

33 7th street P.O. box 4060

Allentown Pa 18105

The Honorable Jeffery A. Watson

Piatt Place

Suite 200

301 5th Avenue

Pittsburg, Pa 15222

Ross E Schell

Ross E Schell

Schell; 09010-71010

Wednesday, June 29, 2016
2:18 PM

OMS Outage History

Trouble Date & Time	Restored Date & Time	Job Number	Duration	Order Description	Cause	Weather Type	Comments
6/24/2007 7:00:00 AM	6/24/2007 7:00:00 AM	130870-1	0	NL Order	Unknown	Unknown	
8/2/2007 10:27:21 PM	8/3/2007 1:40:05 AM	148048-1	160	NL Order	Equipment Failures	Not a Factor	Received from SCADA: 22:27 08/02/2007 UG 3 phase cable failed SC-27715s35327 to SC-27502s35278. Problems with Bakelight insulators between switches of GOLB-9526 at SC-27502s35278 caused approx. a 45 minute delay to restoring last 1339 customers. SC needs permanent repairs.
9/6/2007 8:54:21 AM	9/6/2007 8:54:21 AM	162232-1	0	NL Order	Unknown	Unknown	
11/2/2007 10:02:00 AM	11/2/2007 10:02:00 AM	180420-1	0	NL Order	Unknown	Unknown	
12/16/2007 5:06:00 AM	12/16/2007 5:06:00 AM	205962-1	0	NL Order	Unknown	Unknown	
12/16/2007 5:24:48 AM	12/19/2007 12:00:19 PM	208534-1	4716	NL Order	Trees-Not Trimming Related	Ice/Sleet/ Snow	A & C phase 5 side loops opened at pole 26404s35107 for downed conductors pole 26404s35080 to pole 26403s35060. switch order H-462 WR 35449. Back in service at this time.
12/17/2007 12:45:00 PM	12/17/2007 12:45:00 PM	207559-1	0	NL Order	Unknown	Unknown	
4/30/2008 8:13:20 AM	4/30/2008 10:00:00 AM	253789-1	107	NL Order	Scheduled Outage	Not a Factor	tree trimming crew removed trees
6/16/2008 11:25:00 PM	6/16/2008 11:25:00 PM	277099-1	0	NL Order	Unknown	Unknown	
11/6/2008 8:34:00 AM	11/6/2008 8:34:00 AM	335897-1	0	NL Order	Unknown	Unknown	
5/5/2009 8:48:00 PM	5/5/2009 8:48:00 PM	387901-1	0	NL Order	Unknown	Unknown	
7/14/2009 8:12:00 AM	7/14/2009 8:12:00 AM	411445-1	0	NL Order	Unknown	Unknown	
4/28/2010 7:38:00 AM	4/28/2010 7:38:00 AM	507820-1	0	NL Order	Unknown	Unknown	
5/16/2010 6:19:00 AM	5/16/2010 6:19:00 AM	516918-1	0	NL Order	Unknown	Unknown	
5/29/2010 8:23:00 AM	5/29/2010 8:23:00 AM	521110-1	0	NL Order	Unknown	Unknown	
7/12/2010 4:47:00 PM	7/12/2010 4:47:00 PM	539134-1	0	NL Order	Unknown	Unknown	
7/18/2010 6:24:29 AM	7/18/2010 6:24:29 AM	542366-1	0	NL Order	Unknown	Unknown	
12/15/2010 6:07:00 PM	12/15/2010 6:07:00 PM	604022-1	0	NL Order	Unknown	Unknown	
2/21/2011 8:45:00 AM	2/21/2011 8:45:00 AM	627748-1	0	NL Order	Unknown	Unknown	
5/19/2011 3:45:00 AM	5/19/2011 3:45:00 AM	658805-1	0	NL Order	Unknown	Unknown	
7/29/2011 4:20:00 PM	7/29/2011 4:20:00 PM	699695-1	0	NL Order	Unknown	Unknown	
8/28/2011 6:28:00 AM	8/28/2011 1:15:55 PM	734514-1	407	NL Order	Trees-Not Trimming Related	Wind	::MDT ::SO audit complete per W1814**DMH
9/14/2011 7:49:00 PM	9/14/2011 7:49:00 PM	747643-1	0	NL Order	Unknown	Unknown	
9/14/2011 7:52:46 PM	9/15/2011 12:05:47 AM	747377-1	253	NL Order	Trees-Not Trimming Related	Rain	::MDT ::Tree Removed from conductors and conductors repaired (sleeved) at pole 26986s35029**SO audit complete per W0947**DMH
9/14/2011 9:21:00 PM	9/14/2011 9:21:00 PM	747655-1	0	NL Order	Unknown	Unknown	
9/15/2011 1:47:00 AM	9/15/2011 1:47:00 AM	747708-1	0	NL Order	Unknown	Unknown	
9/15/2011 2:27:00 AM	9/15/2011 2:27:00 AM	747710-1	0	NL Order	Unknown	Unknown	
9/15/2011 3:03:00 AM	9/15/2011 3:03:00 AM	747717-1	0	NL Order	Unknown	Unknown	
10/29/2011 3:07:00 PM	10/29/2011 3:07:00 PM	791317-1	0	NL Order	Unknown	Unknown	
10/4/2012 8:57:00 AM	10/4/2012 8:57:00 AM	915136-1	0	NL Order	Unknown	Unknown	
8/9/2013 5:15:00 AM	8/9/2013 5:15:00 AM	1046036-1	0	NL Order	Unknown	Unknown	
12/1/2013 8:38:00 AM	12/1/2013 9:30:31 AM	1082969-1	72	NL Order	Nothing Found (Explain)	Not a Factor	callout for sub repairman per SO.. rich dorman will work derek shearer will work. CB failure, did not cycle according to reclosing schedule.
1/13/2014 10:10:00 AM	1/13/2014 10:10:00 AM	1094600-1	0	NL Order	Unknown	Unknown	
2/3/2014 12:13:00 PM	2/3/2014 12:13:00 PM	1099084-1	0	NL Order	Unknown	Unknown	
5/21/2014	5/21/2014	1285650-1	0	NL Order	Unknown	Unknown	

9:39:29 AM	9:39:29 AM	1						
5/21/2014 9:41:06 AM	5/21/2014 10:37:00 AM	1285646- 56	NL Order	Equipment Failures	Rain	Per Andy Pattison, failed fiber glass bracket at pole 26964s35049, will lift in the clear. H-0730		
6/5/2014 4:38:25 PM	6/5/2014 4:39:25 PM	1316489- 0	NL Order	Unknown	Unknown			
7/11/2014 6:34:37 AM	7/11/2014 8:30:00 AM	1337880- 116	NL Order	Equipment Failures	Not a Factor	::MDT No Required Permit per e60096 ::@1900-FM OFarrell sd I.Moyer taking call.Tman Welsko in enola. H-1005		
7/19/2014 10:22:59 AM	7/19/2014 10:22:59 AM	1341360- 0	NL Order	Unknown	Unknown			
7/27/2014 6:28:21 PM	7/27/2014 6:28:21 PM	1344311- 0	NL Order	Unknown	Unknown			
10/29/2014 9:02:01 AM	10/29/2014 9:02:01 AM	1374407- 0	NL Order	Unknown	Unknown			
3/31/2015 12:00:16 PM	3/31/2015 12:00:16 PM	1418184- 0	NL Order	Unknown	Unknown			
5/7/2015 11:47:53 AM	5/7/2015 11:50:00 AM	1429278- 3	NL Order	Scheduled Outage	Not a Factor	balancing the load		
6/14/2015 5:35:40 PM	6/14/2015 5:35:40 PM	1764832- 0	NL Order	Unknown	Unknown			
6/23/2015 4:17:45 PM	6/23/2015 4:17:45 PM	1915433- 0	NL Order	Unknown	Unknown			
6/29/2015 11:40:18 AM	6/29/2015 11:40:18 AM	2065179- 0	NL Order	Unknown	Unknown			
8/12/2015 1:07:00 PM	8/12/2015 1:09:00 PM	2134873- 2	NL Order	Equipment Failures	Not a Factor	while performing switching for ABB relay upgrade jobs at Devonshire sub, the 22-2 CB was carrying the 22-4 12kV line, and then the 22-2 CB unexpectedly operated.		
9/1/2015 7:22:50 AM	9/1/2015 7:22:50 AM	2142440- 0	NL Order	Unknown	Unknown			
9/1/2015 7:22:56 AM	9/1/2015 7:22:56 AM	2142441- 0	NL Order	Unknown	Unknown			
9/22/2015 6:05:49 PM	9/22/2015 6:05:49 PM	2150585- 0	NL Order	Unknown	Unknown			
9/22/2015 6:05:50 PM	9/22/2015 6:05:50 PM	2150586- 0	NL Order	Unknown	Unknown			
9/25/2015 10:48:35 PM	9/25/2015 10:48:35 PM	2151771- 0	NL Order	Unknown	Unknown			
2/7/2016 8:17:33 AM	2/7/2016 8:17:33 AM	3177278- 0	NL Order	Unknown	Unknown			
5/10/2016 6:11:40 AM	5/10/2016 6:11:40 AM	3276230- 0	NL Order	Unknown	Unknown			
5/31/2016 7:22:40 PM	5/31/2016 7:22:40 PM	3283767- 0	NL Order	Unknown	Unknown			
6/16/2016 12:15:36 PM	6/16/2016 12:15:36 PM	3291388- 0	NL Order	Unknown	Unknown			
6/27/2016 4:02:07 AM	6/27/2016 4:02:07 AM	3295165- 0	NL Order	Unknown	Unknown			
7/4/2016 3:59:10 PM	7/4/2016 3:59:10 PM	3298511- 0	NL Order	Unknown	Unknown			

Trouble Calls

1082969-1	12/1/2013 8:40:25 AM	No Lights		0901071010
1082969-1	12/1/2013 8:55:04 AM	No Lights		0901071010
1082969-1	12/1/2013 9:30:35 AM	Outbound ERT Call		0901071010
1285646-1	5/21/2014 9:44:24 AM	No Lights	reprtng no power @ residence	0901071010
1285646-1	5/21/2014 10:28:33 AM	Outbound ERT Call		0901071010
1337880-1	7/11/2014 6:49:15 AM	No Lights		0901071010
148048-1	8/2/2007 10:30:55 PM	No Lights		0901071010
148048-1	8/2/2007 10:46:28 PM	No Lights		0901071010
202533-1	12/16/2007 3:41:41 PM	No Lights/Wire Down	WIRES DOWN ACROSS RD @ THIS ADDRESS	0901071010
714514-1	8/28/2011 8:02:13 AM	No Lights		0901071010
739358-1	9/6/2011 5:53:21 PM	No Lights		0901071010
747377-1	9/14/2011 7:58:29 PM	No Lights		0901071010
747377-1	9/14/2011 8:00:56 PM	No Lights		0901071010
747377-1	9/14/2011 10:18:06 PM	No Lights		0901071010
747377-1	9/15/2011 12:03:31 AM	No Lights		0901071010
768299-1	10/29/2011 3:23:47 PM	No Lights		0901071010
771509-1	10/29/2011 7:36:55 PM	No Lights		0901071010

Transformer Outage History (Pre-OMS History for Customer's Current Transformer)

Effectuated Grid	Trouble Time	Restore Time	Job Number	Duration	Cause	Weather
26482535254	7/1/1998 2:54:00 AM	7/1/1998 3:02:00 AM	58982101	8	Vehicles	Not a Factor
26482535254	6/22/2001 4:52:00 PM	6/22/2001 5:57:00 PM	58122201	65	Trees - Not Trimming Related	Lightning
26482535254	1/31/2002 9:46:00 PM	1/31/2002 9:56:00 PM	58219201	10	Other - Non-Controllable	Rain

26482535254	1/31/2002 9:46:00 PM	1/31/2002 10:50:00 PM	56219202	64	Other - Non-Controllable	Rain
26482535254	12/15/2003 7:33:00 PM	12/16/2003 12:23:00 AM	58630801	290	Equipment Failure	Not a Factor
26482535254	8/4/2004 4:42:00 AM	8/4/2004 5:04:00 AM	58728401	22	Nothing Found	Lightning
26482535254	5/2/2005 3:06:00 PM	5/2/2006 4:22:00 PM	58382001	76	Animals	Not a Factor
26482535254	2/1/2007 10:20:00 AM	2/1/2007 11:51:00 AM	58625901	91	Forced Prearranged	Not a Factor