

CAPTION SHEET

USE MANAGEMENT SYSTEM

- 1. REPORT DATE: 00/00/00 :
- 2. BUREAU: ALJ :
- 3. SECTION(S) : 4. PUBLIC MEETING DATE:
- 5. APPROVED BY: : 00/00/00
- DIRECTOR: :
- SUPERVISOR: :
- 6. PERSON IN CHARGE: : 7. DATE FILED: 04/16/03
- 8. DOCKET NO: C-20030069 : 9. EFFECTIVE DATE: 00/00/00

PARTY/COMPLAINANT: NORA J. KRAEUTER

RESPONDENT/APPLICANT: METROPOLITAN EDISON CO.

COMP/APP COUNTY: NORTHAMPTON

UTILITY CODE: 110300

ALLEGATION OR SUBJECT

COMPLAINANT STATES WITH INCREASED DEVELOPMENT WILL COME INCREASED NOISE LEVELS. SHE WANTS PUC TO ADDRESS THE FUTURE INCREASED USAGE OF SUBSTATION TO KEEP NOISE LEVEL UNDER CONTROL.

INFORMATION

MAY 1 2 3

ORIGINAL

C-200 3006
110300

RECEIVED

Formal Complaint Form
Pennsylvania Public Utility Commission

2003 APR 16 AM 9: 52

Please Print: (you may also type your answers directly onto the form as it appears on your screen) SECRETARY'S BUREAU

1. Your name, mailing address and telephone number:

Name Nora J Kraeuter

Street/P.O.Box 1300 Howard Ln Apt # _____

City Easton State Pa Zip 18045

County Northampton Area Code/Home Phone 610 252-8555
Area Code/Work Phone _____

2. Name of company your complaint concerns: GPU

3. What is your complaint? (Use additional paper if need more space).

The continual increase in development in our surrounding area will inevitably have great impact on the usage of electricity from the Northwood Substation. Subsequently, increasing the power levels coming from this Substation. This greatly affects the area residents.

4. What do you want the Public Utility Commission to do about your complaint? (Use additional paper if need more space).

Myself & area residents would like the PUC to address the future increased usage of the Northwood Substation in Palmer Twp. In order to keep the power level under control. These power levels have a great impact on our property values & our well being.

5. You must sign and date your complaint below.

The information I have placed on this form is true and correct to the best of my knowledge. I understand that I could be punished under Pennsylvania State Law if I purposely give false information.

Nora J Kraeuter
Signature

4/7/03
Date

Continued on next page

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COMMONWEALTH OF PENNSYLVANIA
PENNSYLVANIA PUBLIC UTILITY COMMISSION
P O BOX 3265, HARRISBURG PA 17105-3265

DATE SERVED: MAY 15, 2003

C-20030069

MET-ED/PENELEC D/B/A GPU ENERGY
C/O LEILA L VESPOLI
SR VICE PRESIDENT AND GENERAL COUNSEL
FIRSTENERGY CORPORATION
76 S MAIN ST
AKRON OH 44308-1890

Dear Sir/Madam:

A complaint has been filed against you before the Pennsylvania Public Utility Commission by NORA J. KRAEUTER. To defend yourself against the claims stated in the following pages, you must act within twenty (20) days by filing in writing with the Commission, either personally or through your attorney, your defenses or objections to the claims stated against you. Or, you may satisfy the complaint by settling the matter with the Complainant and submitting proof of settlement to the Commission within twenty (20) days.

IF YOU FAIL TO RESPOND WITHIN TWENTY (20) DAYS, THE CASE MAY GO FORWARD IN YOUR ABSENCE AND A JUDGEMENT MAY BE ENTERED AGAINST YOU BY THE COMMISSION WITHOUT FURTHER NOTICE.

CUSTOMER OF A UTILITY

A payment schedule may be prescribed or a termination of utility services may be authorized. You may lose money or property or other rights important to you.

COMPANY/UTILITY

An Administrative Law Judge may revoke or suspend any certificate or permit held by you, or impose a fine, or any other appropriate penalty or remedy authorized by the Public Utility Code. You may lose money or property or other rights important to you.

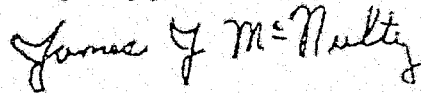
MAY 15, 2003

Detailed instructions on how to proceed are contained in the attached pages. You are advised to read them carefully.

Unless you are a corporation or other organization, you may proceed without a lawyer. However, if you want a lawyer and do not have one or cannot afford one, the office listed below can tell you where you can get legal help:

Pennsylvania Lawyer Referral Service
Pennsylvania Bar Association
P.O. Box 186
Harrisburg, PA 17108
(800) 692-7375

Very truly yours,



James J. McNulty
Secretary

KSB

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

DATE SERVED: MAY 15, 2003

NORA J. KRAEUTER
Complainant

VS.

METROPOLITAN EDISON COMPANY
Respondent

Complaint Docket
No: C-20030069

MAY

FORMAL COMPLAINT NOTICE TO RESPONDENT TO ANSWER OR SATISFY

TO: METROPOLITAN EDISON COMPANY

TAKE NOTICE:

That a complaint in the above entitled matter, of which the attached is a true and correct copy, has been presented and filed of record with the Pennsylvania Public Utility Commission. Section 702 of the Public Utility Code, 66 Pa. C.S. Section 702, requires the Commission to serve on each party named in a complaint a copy of the complaint and notice calling upon each party to satisfy the complaint, or to answer the same in writing within a specified time; THEREFORE,

1. You have twenty (20) days from the date on which this complaint is served to either satisfy this complaint or to file with the Secretary of the Pennsylvania Public Utility Commission, P. O. Box 3265, Harrisburg, PA 17105-3265, an answer (original and two copies), in writing, under oath, which, as required by Section 5.61 of the Commission's Rules of Practice and Procedure, 52 Pa. Code Section 5.61, either affirms or specifically denies the allegations in this complaint. You must also serve a copy of the answer upon the complainant. The date of service is the mailing date as indicated by the date at the top of this Notice. Section 1.56(a) of the Commission's Rules of Practice and Procedure, 52 Pa. Code Section 1.56(a).

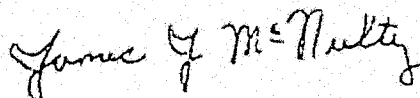
2. If you fail to either satisfy this complaint or to file answer or other responsive pleading within twenty (20) days, you will be deemed to have admitted all the allegations in this complaint in accordance with Section 5.61 of the Commission's Rules of Administrative Practice and Procedure, 52 Pa. Code Section 5.61. In that event, the Commission may, without hearing, enter an order which either revokes or suspends any certificate or permit held by you or which imposes a fine or any other appropriate penalty or remedy authorized by the Public Utility Code, 66 Pa. C.S. Section 101, et seq., and, if you are a customer of a utility, an order may be entered which

prescribes a payment schedule or which authorizes termination of utility services. The Commission is not limited to the relief sought by the complainant in paragraph 4 of the attached complaint.

3. If you elect to satisfy this complaint you must file, within twenty (20) days from the date on which this complaint is served, affidavits executed by each complainant that this complaint has been satisfied. Such affidavits must describe the basis on which this complaint was satisfied; any settlement agreement between the parties must be reduced to writing and attached to the affidavit. Such affidavits are to be filed with the Secretary of the Commission at the address set forth in paragraph 1. Upon receipt of affidavits of satisfaction from all complainants, this complaint may be dismissed by the Commission in accordance with Section 703(a) of the Public Utility Code, 66 Pa. C.S. Section 703(a), unless the Commission determines that such dismissal would be contrary to the public interest, in which event the Commission may direct that hearings be held upon the complaint.

4. If you file an answer which admits the allegations in this complaint, or which fails to specifically deny the allegations in this complaint, the Commission may, without hearing, enter an order which either revokes or suspends any certificate held by you or which imposes a fine or any other appropriate penalty or remedy authorized by the Public Utility Code, 66 Pa. C. S. Section 101, et seq.; and, if you are a customer of a utility, an order may be entered which prescribes a payment schedule or which authorizes termination of utility services. The Commission is not limited to the relief sought by the complainant in paragraph 4 of the attached complaint.

5. If you file a timely answer which specifically denies the allegations in this complaint; or which raises material questions of law or fact, this matter shall be referred to the Office of Administrative Law Judge for hearing and decision. If, after hearing on the issues raised by that answer, you are found to have committed any of the violations alleged in the complaint, the Administrative Law Judge may render a decision which either revokes or suspends any certificate or permit held by you or which imposes a fine or any other appropriate penalty or remedy authorized by the Public Utility Code, 66 Pa. C. S. Section 101, et seq.; and, if you are a customer of a utility, an order may be entered which prescribes a payment schedule or which authorizes termination of utility services. In the imposition of a penalty after a hearing the Administrative Law Judge is not bound by the relief sought by the complainant in paragraph 4 of the attached complaint.



James J. McNulty
Secretary

(SEAL)

Certified Mail
Return Receipt Requested

LAW OFFICES
RYAN, RUSSELL, OGDEN & SELTZER LLP

ORIGINAL

W. EDWIN OGDEN
ALAN MICHAEL SELTZER
JEFFREY A. FRANKLIN
JOHN F. POVLAITIS
BRIGGID M. GOOD
CARL J. ENGLEMAN, JR.

SUITE 301
1100 BERKSHIRE BOULEVARD
READING, PENNSYLVANIA 19610-1221
TELEPHONE: (610) 372-4761
FACSIMILE: (610) 372-4177
WWW.RYANRUSSELL.COM

SAMUEL B. RUSSELL (RETIRED)
HAROLD J. RYAN (1972)
JOHN S. MCCONAGHY (1981)

HARRISBURG OFFICE
SUITE 101
800 NORTH THIRD STREET
HARRISBURG, PENNSYLVANIA
17102-2025
TELEPHONE: (717) 236-7714
FACSIMILE: (717) 236-7816

June 2, 2003

REP

VIA UPS OVERNIGHT

James J. McNulty, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor
Harrisburg, Pennsylvania 17120

RECEIVED

JUN 02 2003

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

Re: Nora J. Kraeuter v. Metropolitan Edison Company
Docket No. C-20030069

Dear Secretary McNulty:

Enclosed please find an original and three (3) copies of the Answer on behalf of Metropolitan Edison Company in the above-referenced matter. These documents are also being served on the parties of record as evidenced by the attached Certificate of Service.

If you have any questions, please contact me.

Very truly yours,

RYAN, RUSSELL, OGDEN & SELTZER LLP

DOCUMENT
FOLDER

Alan Michael Seltzer

Alan Michael Seltzer

Enclosures
AMS:jab

c: As per Certificate of Service

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BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

NORA J. KRAEUTER :

v. :

Docket No. C-20030069

METROPOLITAN EDISON COMPANY :

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the Answer of Metropolitan Edison Company upon the individuals listed below, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

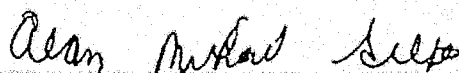
Service by UPS Overnight, postage prepaid, addressed as follows:

James J. McNulty, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor
Harrisburg, PA 17120

Service by First Class Mail, postage prepaid, addressed as follows:

Nora J. Kraeuter
1300 Howard Lane
Easton, PA 18045

Dated: June 2, 2003



Alan Michael Seltzer
Jeffrey A. Franklin
Bridgid M. Good
RYAN, RUSSELL, OGDEN & SELTZER LLP
1100 Berkshire Boulevard, Suite 301
Wyomissing, Pennsylvania 19610-1221
(610) 372-4761

Attorneys for
Metropolitan Edison Company

ORIGINAL
BEFORE THE

PENNSYLVANIA PUBLIC UTILITY COMMISSION

FILED

JUN 02 2003

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

NORA J. KRAEUTER

v.

Docket No. C-20030069

METROPOLITAN EDISON COMPANY

**ANSWER OF METROPOLITAN EDISON COMPANY
TO THE COMPLAINT OF NORA J. KRAEUTER**

DOCUMENT
FOLDER

TO THE PENNSYLVANIA PUBLIC UTILITY COMMISSION:

AND NOW, Metropolitan Edison Company ("Met-Ed" or the "Company"), by and through its counsel, Alan Michael Seltzer, Jeffrey A. Franklin, Bridgid M. Good and Ryan, Russell, Ogden & Seltzer LLP, answers the above Complaint pursuant to Section 5.61 of this Commission's regulations, 52 Pa. Code § 5.61, as follows:

1. Admitted.
2. Denied. It is denied that this Complaint relates to or concerns "GPU." It appears that this Complaint relates to Met-Ed which provides electric service to the Complainant.
3. For purposes of this Answer, the several sentences of this paragraph have been restated and answered as they appear as follows:

DOCKETED
JUN 06 2003

- 1) The continual increase in development in our surrounding area will inevitably have great impact on the usage of electricity from the Northwood Substation.

Admitted in part and denied in part. It is admitted that the area surrounding the Complainant's residential development has been experiencing growth in the last few years. However, it is specifically denied that this population growth has had a "great impact" on electricity usage from the Northwood Substation. On the contrary, it

is averred that the Northwood Substation can safely, adequately and reasonably meet the electric needs of all customers served from that substation.

2) **Subsequently, increasing the noise levels coming from this Substation.**

Admitted in part and denied in part. It is admitted that the Northwood Substation, like all other electric substations, emits noise during routine operations. After reasonable investigation, Met-Ed lacks knowledge or information sufficient to form a belief as to the truth of the averment concerning increased noise levels from that Northwood Substation and demands proof thereof, if relevant, at hearing.

3) **This greatly effects the area residents.**

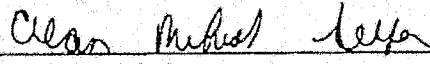
Denied. After reasonable investigation, Met-Ed lacks knowledge or information sufficient to form a belief as to the truth of the averment concerning any effects or impacts on area residents and demands proof thereof, if relevant, at hearing.

4. The allegations in this paragraph constitute a prayer for relief to which no responsive pleading is required.

WHEREFORE, Metropolitan Edison Company hereby requests that the Complaint of Nora J. Kraeuter be dismissed with prejudice.

Respectfully submitted,

Dated: June 2, 2003



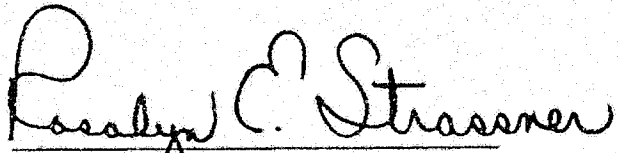
Alan Michael Seltzer
Jeffrey A. Franklin
Bridgid M. Good
RYAN, RUSSELL, OGDEN & SELTZER LLP
1100 Berkshire Boulevard, Suite 301
Wyomissing, Pennsylvania 19610-1221
(610) 372-4761

Attorneys for
Metropolitan Edison Company

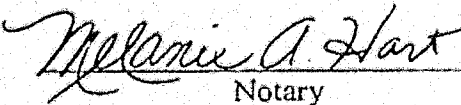
Nora J. Kraeuter
Docket No. C-20030069

COMMONWEALTH OF PENNSYLVANIA)
: ss.
COUNTY OF BERKS)

Rosalyn E. Strassner being duly sworn according to law, deposes and says that she is the Business Analyst-Compliance for Metropolitan Edison Company ("Met-Ed"); that she is authorized to and does make this affidavit for it; and that the facts set forth above are true and correct to the best of her knowledge, information and belief and she expects the said Met-Ed to be able to prove the same at any hearing thereof.


Rosalyn E. Strassner

Sworn to and subscribed before
me this 30th day of ~~June~~, 2003.
May


Notary

Notarial Seal
Melanie A. Hart, Notary Public
Muhlenberg Twp., Berks County
My Commission Expires Feb. 12, 2005
Member, Pennsylvania Association of Notaries