

CAPTION SHEET

USE MANAGEMENT SYSTEM

- 1. REPORT DATE: 00/00/00
- 2. BUREAU: ALJ
- 3. SECTION(S):
- 5. APPROVED BY: DIRECTOR: SUPERVISOR:
- 6. PERSON IN CHARGE:
- 8. DOCKET NO: C-20078098
- 4. PUBLIC MEETING DATE: 00/00/00
- 7. DATE FILED: 08/06/07
- 9. EFFECTIVE DATE: 00/00/00

PARTY/COMPLAINANT: SOKOLY, LOUIS

RESPONDENT/APPLICANT: PENNSYLVANIA ELECTRIC CO.

COMP/APP COUNTY: MCKEAN

UTILITY CODE: 110400

ALLEGATION OR SUBJECT

COMPLAINANT STATES HE CANNOT INSTALL A HOMEGUARD HOUSE SURGE PROTECTOR.

DOCUMENT  
FOLDER

DOCKETED  
AUG 14 2007

Formal Complaint Form

110400

Please print or type.

C-20078098

ORIGINAL

1. CUSTOMER NAME (COMPLAINANT)

Your name, mailing address, county, telephone number, utility account number and service address:

Name Louis Sokoly

Street/P.O. Box 331 Harrisburg Run Apt # \_\_\_\_\_

City Bradford State PA Zip 16701

County McKean

Area Code/HOME Phone 1-814-362-4813

Area Code/WORK Phone SAME

Utility Account Number (from your bill) 100006298739

RECEIVED  
2007 AUG -6 AM 10:56  
P.A.U.C.  
SECRETARY'S BUREAU

If your complaint involves utility service provided to a different address than your mailing address, please list this information below.

Name \_\_\_\_\_

Street/P.O. Box \_\_\_\_\_

City \_\_\_\_\_ State \_\_\_\_\_ Zip \_\_\_\_\_

2. UTILITY NAME (RESPONDENT)

Name of utility company your complaint concerns: Pennek

3. TYPE OF UTILITY (check one)

- ELECTRIC
- GAS
- WATER
- TELEPHONE  
(local, long distance)
- STEAM HEAT
- WASTE WATER
- MOTOR CARRIER  
(taxi, moving company, limousine)

45

4. COMPLAINT (check one)

A. In general, what is your complaint?

- I want to oppose the company's proposed rate increase.
- There are incorrect charges on my bill.
- There is a reliability, safety or quality problem with my utility service.
- I received a notice that my utility service is being terminated.
- I would like a payment agreement.

Other. *I CANNOT INSTALL A HOMEGUARD  
(explain) whole House Surge Protector.*

B. State the facts of your complaint.

Include any specific dates, times or places that are important. If the complaint is about a bill, tell us about any charges that you believe are not correct. Use additional paper if you need more space. Provide copies of all relevant documents you believe will support your complaint.

5. RELIEF

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



331 Harrisburg Row  
Bradford, PA 16701

ON June 9<sup>th</sup> AT 1:33 P.M ON A Saturday we had a power Surge. After Power was restored we checked for damages. After collecting all receipts, replacing lost items. We called our Insurance Company. ON June 21<sup>st</sup> I contacted Penelec To Inform them that I purchased a Home Guard Meter Mounted Surge Protector. I TALKED TO A girl whose name was Amy. I was told to go ahead AND INSTALL IT. ALL I had to do was CALL Penelec To let them know so the Meter Reader could put in a new Tab. ON June 22<sup>nd</sup> A second call was placed to Penelec. This Time my son TALKED TO Karen AND we we told the same thing. We Installed The Home Guard, I should say my son Installed it. He is AN Electrician. We call Penelec AND told them it was Installed. They said The meter Reader would PUT A new Tab ON The Meter. ON July 19<sup>th</sup> The Meter Reader installed A

Two Gentlemen From 'Perdec' came  
To my House. I went out to see  
if there was a problem. They  
did not tell me their names and  
no I.D. Badges. All they had was  
a Perdec Truck. I said is there a  
problem, one gentleman said I have  
to remove the surge protector. I  
said why. He said ice could break  
the glass, I said I never heard of  
ice forming at a peak. He then said  
some could steal the meter. I told  
these two gentlemen all I want to do  
is protect my property. They said  
I would be receiving a letter to remove  
it. On Friday July 27<sup>th</sup> called Perdec  
I talked to a lady whose name is  
MARIA, badge No A0204. I explained  
the problem to her. After a few  
minutes she told me a gentleman  
was going to call. That afternoon  
I received a call from DAN ROSANSKI  
I explained my problem to him. He  
told me Perdec used to install  
these 4 years ago, but no longer do.  
I asked why a person cannot try to  
protect his home & business. He said  
he would have to look into this

4: P.M He called BACK AND SAID I would Be Reimbursed For ALL The Sunge Protection + Labor. I Asked Him Again why CAN we NOT HAVE this. He Told me To go To The Web. site AND they HAVE A Home Guard. I Told This Gentleman what Do you Think I Purchased. If Hubbell sell's Them AND There is NO Evidence That states PENNSYLVANIA CANNOT HAVE Them what is The problem.

Relief. ALL I want to Know is why A person CANNOT Protect his Home + Business. I CANNOT get A STRAIGHT ANSWER From Penchec. Unless They Are NOT receiving ANY money From This. INSURANCE rates Are going up. This is The Second Time in 3 1/2 years we had To make A CLAIM. I Feel sorry For people ON Fixed incomes, when They loose 500<sup>00</sup> To 1000<sup>00</sup> AND There deductible is 1000<sup>00</sup> I will Give you The Claim No. 316-402-728

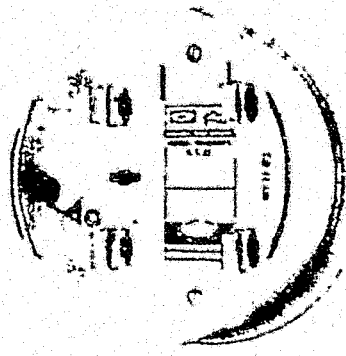
**TVSS Products**  
**HOMEGUARD™ Utility Meter Socket**  
*Whole House Surge Protection*  
**100,000 Peak Amperage Capacity**

*endy/SL*

**Hubbell HomeGuard Meter-Mounted Surge Suppression**

Description	Voltage	Catalog Number
Meter-socket mounted, whole-house surge suppressor.	Single Phase 120/240V AC	HBL65MPC

*Note: For technical information, see page J-18.*



HBL65MPC

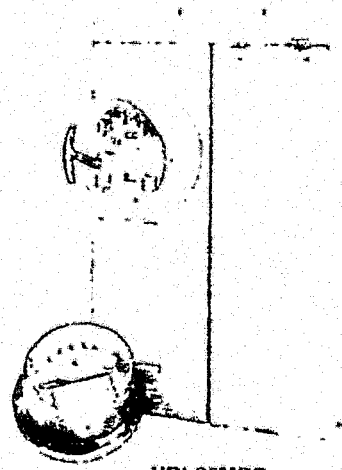


**HomeGuard™ Meter-Mounted Residential Surge Protection**

The SpikeShield® TVSS offering from Hubbell also includes a product designed to provide "whole house protection" at the utility meter socket. The HomeGuard surge suppression system provides service entrance protection against lightning or other externally generated transients. This products has a 100,000 peak amp capacity for single phase 200 amp meter sockets. HomeGuard is designed to isolate your home from external events that affect power quality.

Features	Benefits
Thermal fusing.	Thermal fuse prevents the MOV from overheating when exposed to high current levels, a patented Hubbell exclusive.
Meter socket adapter design.	Mounts quickly and easily to the meter socket at the entrance.
Audible alarm.	Audible alarm for module failure.

*Note: HomeGuard is UL (cUL) Listed as a secondary surge arrester and tested to ANSI/IEEE C92.11 Standard.*



HBL65MPC



Hubbell HOMEGUARD meter-mount surge suppression is pictured connected to local utility service (above). HOMEGUARD meter-mounted surge protection should be installed by your local utility service.





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

IN REPLY PLEASE  
REFER TO OUR FILE

DATE SERVED: August 14, 2007

C-20078098

PENNSYLVANIA ELECTRIC COMPANY  
C/O LEILA L VESPOLI  
SR VICE PRESIDENT AND GENERAL COUNSEL  
FIRSTENERGY CORP  
76 S MAIN ST  
AKRON OH 44308-1890

DOCUMENT  
FOLDER

Dear Ms. Vespoli:

A complaint has been filed against you before the Pennsylvania Public Utility Commission by LOUIS SOKOLY. 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.

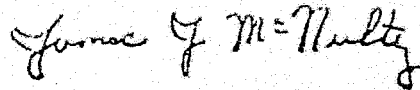
Detailed instructions on how to proceed are contained in the attached pages. You are advised to read them carefully.

August 14, 2007

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

ane

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

DATE SERVED: August 14, 2007

LOUIS SOKOLY  
Complainant

DOCUMENT  
FOLDER

v.

PENNSYLVANIA ELECTRIC COMPANY  
Respondent

Complaint Docket  
No: C-20078098

DOCKETED  
AUG 14 2007

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FORMAL COMPLAINT NOTICE TO RESPONDENT TO ANSWER OR SATISFY

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TO: PENNSYLVANIA ELECTRIC 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 three 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).

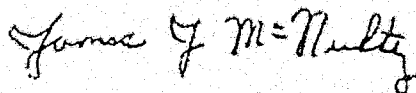
2. If you fail to either satisfy this complaint or to file answer or other responsive pleading within twenty (20) days, you will be deemed to have admitted all the allegations in this complaint in accordance with Section 5.61 of the Commission's Rules of Administrative Practice and Procedure, 52 Pa. 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

**STEVENS & LEE**  
**LAWYERS & CONSULTANTS**

17 North Second Street  
16th Floor  
Harrisburg, PA 17101  
(717) 234-1090 Fax (717) 234-1099  
www.stevenslee.com

Direct Dial: (717) 255-7365  
Email: mag@stevenslee.com  
Direct Fax: (610) 988-0852

September 4, 2007

**VIA HAND DELIVERY**

James J. McNulty, Secretary  
PA Public Utility Commission  
Keystone Building  
P.O. Box 3265  
Harrisburg, PA 17105-3265

**ORIGINAL**

Re: Louis Sokoly v. Pennsylvania Electric Company  
Case No. C-20078098

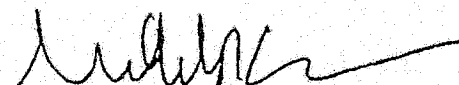
Dear Secretary McNulty:

I am enclosing an original and three copies of an Answer to Complaint with New Matter for filing in the referenced docket. Should you have any questions or comments, please feel free to contact my office.

**DOCUMENT  
FOLDER**

Very truly yours,

STEVENS & LEE

  
Michael A. Gruin

Enclosures

cc: certificate of service

**BTL**

Philadelphia • Reading • Valley Forge • Lehigh Valley • Harrisburg • Lancaster • Scranton  
Williamsport • Wilkes-Barre • Princeton • Cherry Hill • New York • Wilmington

A PROFESSIONAL CORPORATION

100

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

LOUIS SOKOLY  
Complainant

v.

PENNSYLVANIA ELECTRIC COMPANY  
Respondent

Docket No. C-20078098

DOCUMENT  
FOLDER

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ANSWER TO COMPLAINT AND NEW MATTER  
OF PENNSYLVANIA ELECTRIC COMPANY

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On August 14, 2007, Pennsylvania Electric Company ("PENELEC") was served with a formal Complaint from Louis Sokoly ("Complainant"), in the above captioned Docket Number Pursuant to 52 Pa Code § 5.61, PENELEC hereby responds to the Complaint of the Complainant as follows:

ANSWER

1. Admitted in part and Denied in part. PENELEC admits that Complainant's account number is 100006298739. PENELEC is without knowledge or information sufficient to form a belief as to the truth of the other averments in paragraph 1 and, therefore, such allegations are deemed denied.

2. Admitted.
3. Admitted.
4. Denied.

**DOCKETED**  
SEP 05 2007

5. Denied. To the extent the allegations contained in Paragraph 5 constitute conclusions of law or ultimate fact to which no responsive pleading is required, they are as such deemed denied.

6. Denied. PENELEC is without knowledge or information sufficient to form a belief as to the truth of this averment and, therefore, such allegation is deemed denied.

7. Admitted.

8. Denied. To the extent the allegations contained in Paragraph 8 constitute conclusions of law or ultimate fact to which no responsive pleading is required, they are as such deemed denied.

#### NEW MATTER

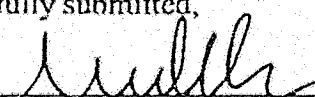
9. PENELEC is investigating the customer's complaint and has been in contact with the customer regarding a possible resolution of his complaint.

10. PENELEC requests that this matter be referred to mediation for final resolution. Alternatively, PENELEC requests that this matter be dismissed, with prejudice.

#### REQUEST FOR RELIEF

For all of the reasons stated herein, PENELEC respectfully requests that this matter be referred to mediation for final resolution.

Respectfully submitted,

  
\_\_\_\_\_  
Renardo L. Hicks  
Michael A. Gruin

17 North Second Street  
16th Floor  
Harrisburg, PA 17101  
Telephone: 717-255-7364  
Facsimile: 610-988-0851  
rlh@stevenslee.com  
mag@stevenslee.com  
Counsel for Pennsylvania Electric Company

DATED: September 4, 2007

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

LOUIS SOKOLY

Complainant

v.

PENNSYLVANIA ELECTRIC COMPANY

Respondent

Case No. C-20078098

VERIFICATION

I, Rosalyn E. Strasser

verify that the answers and the factual allegations contained in the foregoing Answer are true and correct to the best of my knowledge, information and belief and that I expect to be able to prove the same at a hearing held in this matter. I understand that false statements herein are made subject to the penalties of 18 Pa. C.S. §4904, relating to unsworn falsifications to authorities.

8/31/07  
Date

Rosalyn E. Strasser

SEP 11 2007

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

LOUIS SOKOLY  
Complainant

v.

PENNSYLVANIA ELECTRIC COMPANY  
Respondent

Docket No. C-20078098

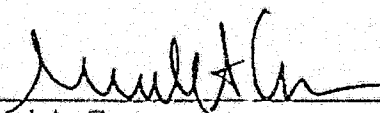
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CERTIFICATE OF SERVICE

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

VIA First Class U.S. Mail

Louis Sokoly  
331 Harrisburg Run  
Bradford, PA 16701

  
\_\_\_\_\_  
Michael A. Gruin

DATED: September 4, 2007