

PLEASE DOCKET

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Linda L. David

v.

C-20055501

PPL Electric Utilities Corporation  
and  
South Whitehall Township (Joined as an  
Indispensable Party)  
and  
City of Allentown (Joined as an  
Indispensable Party)  
and  
South Whitehall Township Authority  
(Joined as an Indispensable Party)

DOCUMENT  
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PA. P.U.C.  
SECRETARY'S BUREAU

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PREHEARING ORDER

A second telephonic prehearing conference was held on July 27, 2006. The presiding officer was Administrative Law Judge Charles E. Rainey, Jr. Present were Linda L. David (Complainant), PPL Electric Utilities Corporation (PPL), South Whitehall Township (Township), City of Allentown (Allentown) and South Whitehall Township Authority (Township Authority).

1 Prehearing Conference Memoranda

Pursuant to my Order dated June 6, 2006, the Township Authority submitted a prehearing conference memorandum and the Township submitted an updated prehearing conference memorandum, each dated July 12, 2006. PPL submitted an updated prehearing conference memorandum under cover letter dated July 13, 2006. On July 10, 2006, I received from Complainant a document styled "Memorandum - Prehearing Conference July 27, 2006."

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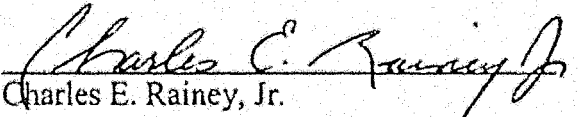
2 Written Testimony and Hearing Schedule

The following schedule was established:

September 28, 2006	Written Direct Testimony of Complainant due in-hand
November 15, 2006	Written Rebuttal Testimony of Other Parties due in-hand
November 30, 2006	Evidentiary Hearing

The parties represented by attorneys in this case are required to follow the Commission's rules regarding written testimony found at 52 Pa. Code §5.412. All parties are required to number the pages of their written testimony. Written testimony is to be accompanied by any related exhibits. Copies of written testimony are to be sent to me as well as the other parties. Copies of written testimony are due in my hands and the hands of the other parties by the due dates. Parties must bring two copies of their written testimony with them to the evidentiary hearing to be given to the court reporter.

The evidentiary hearing will be held in an available hearing room on the 13<sup>th</sup> Floor of the Philadelphia State Office Building, 1400 West Spring Garden Street, Philadelphia, PA 19130. The evidentiary hearing will begin at 10 00 a.m.

  
Charles E. Rainey, Jr.  
Administrative Law Judge

Date: July 28, 2006

Linda L. David v. PPL Electric Utilities Corporation, South Whitehall Township (Joined as an Indispensable Party), City of Allentown (Joined as an Indispensable Party) and South Whitehall Township Authority (Joined as an Indispensable Party)  
Docket Number C 20055501

SERVICE LIST

Linda L. David  
2922 W. Fairview Street  
Allentown, PA 18103

Anthony D. Kanagy, Esquire  
Post & Schell  
17 North Second Street  
12<sup>th</sup> Floor  
Harrisburg, PA 17101-1601

Martin J. Danks, Esquire  
Assistant City Solicitor  
City of Allentown  
435 Hamilton Street, Suite 519  
Allentown, PA 18101

Anthony R. Sherr, Esquire  
Mayers, Mennies & Sherr, LLP  
3031 Walton Road  
P.O. Box 1547  
Blue Bell, PA 19422-0440

South Whitehall Township  
444 Walbert Avenue  
Allentown, PA 18104



COMMONWEALTH OF PENNSYLVANIA  
PENNSYLVANIA PUBLIC UTILITY COMMISSION  
Office of Administrative Law Judge  
P.O. BOX 3265, HARRISBURG, PA 17105-3265  
August 1, 2006

IN REPLY PLEASE  
REFER TO OUR FILE

In Re: C-20055501

(See attached list)

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Linda L. David  
v.  
PPL Electric Utilities Corporation and South Whitehall Township  
and City of Allentown

Service dispute.

Hearing Notice

This is to inform you that a hearing on the above-captioned case will be held as follows:

Type: Initial hearing  
Date: Thursday, November 30, 2006  
Time: 10:00 a.m.  
Location: In an available hearing room  
Philadelphia State Office Building  
Broad and Spring Garden Streets  
Philadelphia, PA 19130  
Presiding: Administrative Law Judge Charles E. Rainey,  
1302 Philadelphia State Office Building  
1400 West Spring Garden Street  
Philadelphia, PA 19130  
Telephone: 215.560.2105  
Fax: 215.560.3133

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OCT 3 2006

2005-05-1 P112:05

Attention: You may lose the case if you do not come to this hearing and present facts on the issues raised.

If you intend to file exhibits, 2 copies of all hearing exhibits to be presented into evidence must be submitted to the reporter. An additional copy must be furnished to the Presiding Officer. A copy must also be provided to each party of record.

Individuals representing themselves do not need to be represented by an attorney. All others (corporation, partnership, association, trust or governmental agency or subdivision) must be represented by an attorney. An attorney representing you should file a Notice of Appearance before the scheduled hearing date.

If you are a person with a disability, and you wish to attend the hearing, we may be able to make arrangements for your special needs. Please call the scheduling office at the Public Utility Commission at least (2) two business days prior to your hearing:

- Scheduling Office: 717.787.1399
- AT&T Relay Service number for persons who are deaf or hearing-impaired: 1.800.654.5988

pc: Judge Rainey  
Susan Licon  
Beth Plantz  
Docket Section  
Calendar File

C-20055501 LINDA L. DAVID v. PPL ELECTRIC UTILITIES CORPORATION

LINDA L DAVID  
2922 WEST FAIRVIEW STREET  
ALLENTOWN PA 18103  
610-740-0637

ANTHONY D KANAGY ESQUIRE  
POST & SCHELL  
17 NORTH SECOND STREET 12TH FLOOR  
HARRISBURG PA 17101-1601  
610-871-1324

MARTIN J DANKS ESQUIRE  
ASSISTANT CITY SOLICITOR  
CITY OF ALLENTOWN  
435 HAMILTON STREET ROOM 519  
ALLENTOWN PA 18101

ANTHONY SHERR ESQUIRE  
3031 WALTON STREET  
BUILDING A SUITE 330  
PO BOX 1547  
BLUE BELL PA 19422

SOUTH WHITEHALL TOWNSHIP  
444 WALBERT AVENUE  
ALLENTOWN PA 18104

BLAKE C MARLES ESQUIRE  
STEVENS & LEE  
190 BRODHEAD ROAD SUITE 200  
PO BOX 20830  
LEHIGH VALLEY PA 18002-0830

**OALJ Hearing Report**

Please check Those Blocks Which Apply

Docket No:	C 20055501	YES	NO
Case Name:	Linda L. David v. PPL Electric Utilities	Prehearing Held:	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
Corporation:		Hearing Held:	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
Location:	Philadelphia, PA	Testimony Taken:	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
Date:	July 27, 2006	Transcript Due:	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
ALJ:	Charles E. Rainey, Jr.	Hearing Concluded:	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
Reporting Firm:	Sargents Court Reporting	Further Hearing Needed:	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
		Estimated Add'l Days:	1
		RECORD CLOSED:	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
		DATE:	
		Briefs to be Filed:	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
		DATE:	TO BE ESTABLISHED
		Bench Decision:	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
		REMARKS:	

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AUG - 7 2006

PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

\*OALJ Scheduling Unit to schedule an evidentiary hearing to be held on Thursday, Nov. 30, 2006, at 10:00 a.m. in an available hearing room on the 13th Floor of the Philadelphia State Office Building.

PLEASE PRINT CLEARLY - Incomplete Information may result in delay of processing.

Name and Telephone Number	Address	Who are you representing?
Linda L. David Telephone: 610-740-0637	2922 W. Fairview St. City: Allentown State: PA Zip: 18103	Pro Se
Anthony D. Karagy, Esq. Telephone: 717-612-6034	17 North Second St. 12th Floor City: Harrisburg State: PA Zip: 17101	PPL Electric Utilities
Martim J Danks, Esq. Telephone: 610-437-7545	435 Hamilton Street Suite 519 City: Allentown State: PA Zip: 18101	City of Allentown

Check this box if additional parties or attendees appear on back of form.

*Kenneth A. Hean*  
Reporter's Signature

Note: Completion of this form does not constitute an entry of appearance, see 52 Pa. Code §§1.24 and 1.25.

# OALJ Hearing Report

Please check those blocks which apply

Docket No.:	C-20055501		YES	NO
Case Name	Linda L. David v. PPL Electric Utilities Corporation	Prehearing Held:	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Corporation		Hearing Held:	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Location	Philadelphia, PA	Testimony Taken:	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Date	November 30, 2006	Transcript Due:	<input checked="" type="checkbox"/>	<input type="checkbox"/>
ALJ	Charles E. Raney, Jr.	Hearing Concluded:	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Reporting Firm	Precision Reporting	Further Hearing Needed:	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		Estimated Add'l Days:		
		RECORD CLOSED:	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		DATE:	Jan. 2, 2007	
		Briefs to be Filed:	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		DATE:		
		Bench Decision	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		REMARKS:	The records to close by Jan. 2, 2007	

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JAN 1 - 2007

PHILADELPHIA COUNTY COMMISSION  
CLERK OF THE COUNTY

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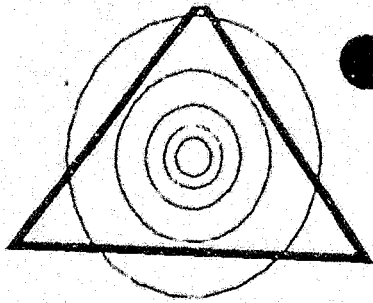
PLEASE PRINT CLEARLY - Incomplete information may result in delay of processing.

Name and Telephone Number	Address	Who are you representing?
ANTHONY A KANAGY POST & SCHELL	17 N. Zehel St. 12th Floor Harrisburg PA 17101	PPL electric Utilities Corporation <b>BTL</b>
Telephone: 717.612.6034	E-mail Address: a.kanagy@postshell.com	Fax Number: 717.731.1585
Anthony R. Sherr Mayers, Meiners & Sherr, LLP (610) 825-0300	PO Box 1547 Blue Bell, PA 19422	South Whitehall Twp South Whitehall Authority
Telephone:	E-mail Address: asherr@mmsllp.com	Fax Number: 610 825-6555
ALAN LOCH TRINITY ASSOC, INC 610 876 6428 Ext 21	P.O. Box 146 SWARTHMORE, PA 19081	LINDA DAVID
Telephone:	E-mail Address:	Fax Number: 610 544 2016

Check this box if additional parties or attendees appear on back of form.

*Warren Stevens*  
Reporter's Signature

*Note: Completion of this form does not constitute an entry of appearance, see 52 Pa. Code §§1.24 and 1.25.*



# TRINITY ASSOCIATES, INC.

P.O. BOX 146, SWARTHMORE, PA. 19081

(610) 544-0496 (800) 982-4359 FAX (610) 544-2016

Engineering Shop, 2210 Walnut Street, Chester, PA. 19013

(610) 876-6428

FAX (610) 876-7178

EMAIL: TRN1YFF@BELLATLANTIC.NET WWW.TRINITYASSOC.COM

December 1, 2006

Ms Linda David  
2922 W Fairview Street  
Allentown, PA 18103

CC Judge Rainey, Penna PUC, 13<sup>th</sup> Fl, Penna Office Bldg. Broad & Spring Garden Sts., Phila., PA  
Kristie M. Ripke, PE, PPL, 827 Hausman Road, Allentown, PA 18104  
James Franklin Balliet, South White Hall Township Authority, 4235 Manor Drive, Allentown, PA 18104

Subject Hearing, November 30, 2006

Dear Linda:

My feelings after the hearing yesterday can be summarized by the following observations

1. South Whitehall township did not produce anyone including an expert witness to say the damage to your home wasn't done by the pumps at the pumping station. The closest they came was to quote an official who you summoned who said it wasn't blast damage. South Whitehall did not have any testing done to disprove the vibration doesn't come from their pumping station. You have been made to pay for tests even though PIDCOCK or South Whitehall Authority should have paid for them from an ethical standpoint.

Now, as a further observation as to how South Whitehall Township Authority operates, please note, Defendants Exhibit Balliet 2. See the dates we monitored your (Ms. David's) home for vibration, roughly September 14 through 24 where the average water pumped per day was 114,000. The day after we stopped monitoring, the rate was increased to 559,966 the next day, 578,303, 569,863, 648,124, 654,318 (more than 5 times rate increase).

This low rate while we were monitoring \*(lower than any other comparable continuous two week period during the year except when the pumps were completely shut down) with the taking the pumps out of service and probably rebuilding them to reduce the vibration less than a month after our monitoring is close to an admission of guilt from people who didn't employ vibration isolation methods at their pumping station.

The judge should rule in your favor and make them pay for damages to your home/buy your home at fair market value without this problem. The burden of proof is on them given all this evidence.

2. PPL has the theoretical capability and experience to realize that constructing a U shape high tension line next to a residential area, which in this case, has a major water line crossing the top part of the U can and, in this case, does form a loop or electrical turn that is the definition of an electromagnet that could generate a significant magnetic field whenever an unbalance is present in the aerial high line and current flows in the water pipe or ground crossing the U this magnetic field could link with other path loops\*\* and generate significant ground currents that might include your water pipe the way a transformer high voltage coil generates current in the low voltage coil of a transformer.

Ms David - Page 2

X Mrs Kristie M Ripke, PE of PPL, should acknowledge this fact and act to avoid all similar aerial high voltage designs and when a capacitor bank fuse blows that sometimes causes high ground current to flow potentially through water piped which act as a return path, act with promptness to rebalance the load quickly so the public, you in particular, isn't endangered.

X Mrs. Ripke, PE, should also advise PPL and South Whitehall Township Authority to try and minimize the harmonics in variable speed pumps, etc., that cause a large amount of neutral (often flows in ground grid or water pipes) current to flow by recommending filters (active and passive) be installed on harmonic producing equipment installed by PPL's customers so the ground grid current flow is minimized and, thus, customers such as Ms. David are protected.

X Note, in the case of capacitor imbalance, the magnetic fields would only be generated possibly (depending on capacitor design) during a blown fuse situation and, thus, the magnetic field in Ms. David's house might be normal 95-99% of the time, but abnormally high when an unbalance (high ground current) is present.

X Since capacitors don't affect service, a blown fuse could be present for weeks or a month or more until it was noticed by PP&L personnel. Your situation could justify increased monitoring of the possible causes of unbalanced loads in your area

Please call if you have any questions.

Sincerely yours,

*Alan A. Loch*  
Alan A. Loch  
BS in Electrical Engineering

Attachment Balliet Exhibit 2

X •Note, you insisted on us parking our unmarked car inside your garage when we placed the equipment and were concerned South Whitehall Authority might do what they apparently did, hide the full magnitude of the problem by minimizing the running of the pumps. How did they know we were there and the exact time we stopped monitoring without an extensive surveillance system in place?

X ••Your water pipe and the transmission line to your transformer also forms another loop or electrical turn and ground current could make this into an electromagnet.

2004

South Whitehall Township  
Daily Water Withdrawal - Lehigh County Permit #W39-706

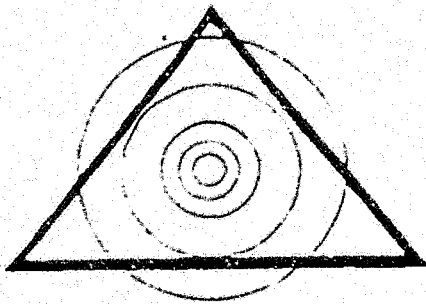
	March	April	May	June	July	August	September	October	November	December	Total
	163,080	218,224	177,664	224,162	37,762	60,991					1,407,140
	73,435	61,252	66,879	66,879	21,375	21,375	21,375	21,375	21,375	21,375	1,371,418
	59,158	201,919	141,525	81,745	720,161	262,722	24,255	71,464	319,132	226,372	1,881,434
	182,506	208,591	17,671	85,210	741,049	215,212	86,795	65,331	150,261	133,251	2,710,112
	169,710	10,325	5,449	77,509	292,228	20,773	159,301	52,766	119,837	133,251	1,839,231
	176,129	55,172	52,308	25,536	107,543	284,963	131,691	119,837	261,776	316,142	1,730,093
	158,005	50,000	114,822	64,021	61,075	136,233	81,453	66,146	75,263	397,372	1,459,596
	42,271	51,000	42,525	221,617	115,814	199,817	38,267	59,739	75,263	397,372	1,712,344
	38,487	90,500	1,376	791,571	130,156	159,017	85,676	65,461	395,598	316,042	1,905,795
	43,114	190,594	19,370	458,435	151,511	134,009	213,521	63,540	410,756	277,658	2,768,500
	26,263	151,012	11,417	199,891	21,534	118,472	131,201	377,277	289,429	346,853	2,484,165
	77,840	198,885	35,196	137,894	53,754	105,152	115,569	18,308	445,279	291,960	2,172,193
	45,159	23,395	165,011	167,548	35,780	191,881	171,161	46,090	462,521	137,221	1,946,145
	87,677	79,250	124,972	116,127	70,625	106,631	114,886	47,997	315,710	242,078	1,746,546
	63,244	15,578	170,507	146,978	21,466	157,251	137,479	76,389	344,755	343,141	1,911,135
	118,005	16,116	129,579	188,760	225,102	415,771	115,504	75,743	427,658	298,133	2,348,551
	17,121	23,261	165,563	105,091	84,808	322,591	71,011	71,619	290,529	349,708	2,019,163
	17,585	29,322	137,084	182,923	191,716	228,960	115,328	72,760	173,486	359,300	1,903,616
	28,287	261,210	205,038	149,151	159,013	303,962	65,651	200,910	322,235	365,781	1,764,196
	47,531	305,038	310,131	119,147	286,473	241,399	108,302	715,657	514,382	375,122	2,754,240
	209,828	135,079	135,079	135,079	262,270	300,178	177,911	103,656	514,382	375,122	2,754,240
	105,176	395,203	395,203	125,675	110,475	270,123	3,073	278,062	278,062	315,189	2,124,372
	186,508	197,948	197,948	57,252	175,815	273,474	524,579	278,062	130,432	130,432	2,806,165
	215,105	101,293	101,293	184,859	184,859	255,454	574,303	273,601	341,549	341,549	2,556,524
	204,140	225,262	225,262	142,073	156,262	255,512	568,863	203,408	374,331	374,331	2,708,916
	225,129	269,280	269,280	132,348	51,150	281,599	148,124	297,190	352,357	372,213	2,820,415
	210,155	37,997	103,347	202,170	101,847	308,792	634,318	321,274	371,056	249,157	2,585,049
	323,730	445,654	172,050	172,050	101,847	298,477	111,503	371,056	204,145	204,145	2,491,574
	319,751	422,298	422,298	247,874	247,874	199,210	1,530,756	7,510,789	3,832,140	55,131,353	371,445
	3,383,546	1,623,847	1,623,847	4,756,117	4,756,117	1,885,905	6,350,950	1,530,756	7,510,789	3,832,140	55,131,353
	31	26	26	31	31	31	31	20	22	31	333
	175,276	53,692	173,117	158,654	154,541	222,126	210,233	31,540	344,127	317,175	195,590
	373,750	278,750	445,654	438,446	246,373	116,721	654,718	372,277	702,855	443,122	2,810,455
	17,623	115	115	75,635	34,544	20,772	51,150	0	39,681	137,271	371,445

114,000  
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5 days  
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rebuild  
pumps ->

No water pumps  
Rebuild pumps?

574,303  
568,863  
[48,124  
634,318



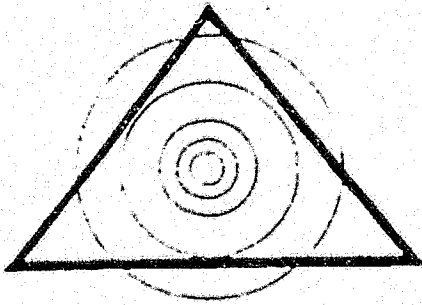
**TRINITY ASSOCIATES, INC.**  
2210 WALNUT ST., CHESTER, PA 19013  
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BELOW ARE SOME OF THE COMPANIES TRINITY ASSOCIATES, INC. HAS DONE WORK FOR -  
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Abington School District  
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Amatek  
Augustana College  
American Standard  
American Can  
Airco Speer  
Bethesda Naval Hospital  
Bowen and McLaughlin  
B.F. Goodrich  
Bendix Field Engr. Corp.  
Burdett Oxygen  
Boeing-Vertol Company  
Bell Telephone  
Bay Condominium  
Culpepper County Schools  
Coleman Manufacturing  
Crozer-Chester Medical Center  
Corning Glass  
Coca Cola  
Caron International  
Container Research Corp.  
Celanese Fibers  
Certainteed Corporation  
Camden City Schools  
Congolet Corporation  
Campbell Chain  
DuPont Co, Inc.  
Denver Merchant Mart  
Des Moines Comm. College  
Derry Twp. Municipal Authority  
Donnelly Printing  
Exxon Chemical  
Defense Mapping Center  
Eli Lilly  
Sportland (ESSO International)  
EMS Inc.  
First Pennsylvania Bank  
Fort Lee  
Fruehauf Shipping  
Franklin Mint  
Franklin Square Hospital  
Franklin Plaza Hotel

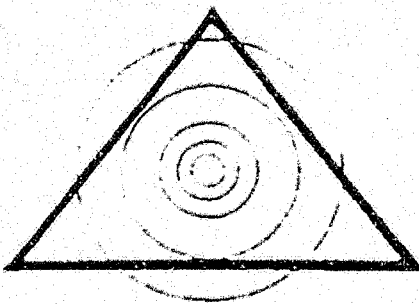


**TRINITY ASSOCIATES, INC.**  
2210 WALNUT ST., CHESTER, PA 19013  
(215) 876-6428 • FAX (215) 544-2016

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Federal Mogul  
Gates Rubber Company  
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General Foods  
Garden State Hospital  
Gulf Interstate  
Hazelton Elementary School  
Harris Corporation  
Home Owners Association  
Harrisburg Comm. General Hospital  
Industrial Valley Bank  
Interstate Container Corporation  
ICI Americas  
Iceland Seafood Corporation  
ITT  
Johnson Controls  
Jersey City State College  
K-Mart  
Kings Plaza  
Kings Mall  
Lake County Government Center  
Land-O-Lakes Inc.  
Lukens Steel  
Metropolitan Edison  
Maryland National Guard  
Merchants Refrigeration  
Maryland Cup Corp.  
Marriott Hotel  
Mt. Olivet V.  
Messiah College  
Mead Corporation  
Midas International Parts  
Maple Press  
Nacogdoches Memorial Hospital  
NEAPCO  
National Lead  
Owens Illinois Co.  
Old Orchard High School  
Ormet Company  
Parkview Hospital  
Phoenix Steel  
Prudential Insurance Co.  
Pennsylvania House  
Pic Reality  
Regency Hotel  
Reeses Candy

Fitkins Hospital  
General Auto Parts  
Graham Manufacturing  
General Battery  
Giles County School  
Goucher College  
Harrison High School  
Holiday Inns  
Hose Hospital  
Hollins College  
Honeywell Corporation  
Illinois Bell Telephone  
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IBM  
Insurance Co. of North America  
Injectronics  
Johnson & Johnson  
LaSalle College  
Kingsford Fire Log Co.  
Keebler Company  
Penn Optical  
Lake Bluff Elementary School  
LaSalle Steel  
Muhlenberg Township Authority  
Montgomery Ward  
Middlesex Water Co.  
Medford Leas  
Methodist Hospital  
McCann's VoTech  
Mobil  
Morristown High School  
Martinsville Memorial Hospital  
Massey Fergusson  
National Homes Corporation  
Nine Mile Nuclear Plant  
Newton Roofing  
New Jersey Bell  
Osage Hills Shopping Center  
Oklahoma Air National Guard  
Ohio American Water Company  
Presbyterian Hospital  
Phoenixville Hospital  
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Rollaway Bearing  
Progressor Foods  
Reliance Insurance Co.

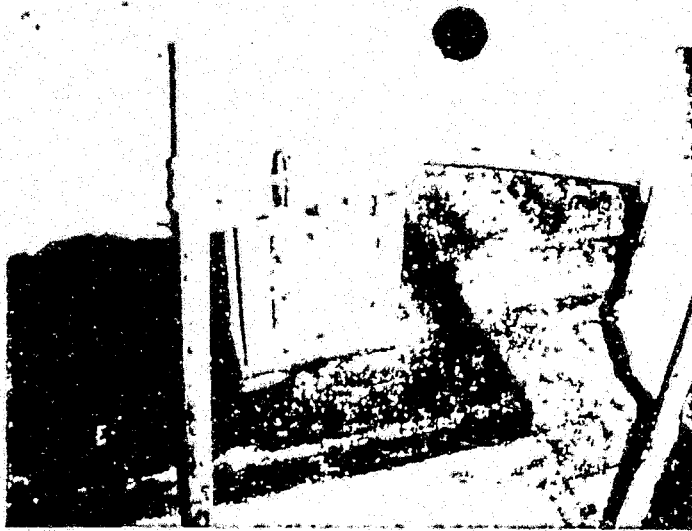


**TRINITY ASSOCIATES, INC.**  
2210 WALNUT ST., CHESTER, PA 19013  
(215) 876-6428 • FAX (215) 544-2016

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Rancocas Valley Hospital  
Revere Copper and Brass  
Roanoke College  
River Oaks Shopping Center  
St. Regis Paper  
Stuart Pharmaceutical  
Shultz Sav-O-Store Inc.  
Stokely Hospital  
Stroh's Brewery  
7-UP  
Spring Lake Public Schools  
Reichold Chemical Co.  
St. Peter's Hospital  
Sacred Heart Hospital  
Syracuse VA Hospital  
St. Joseph's College  
Sharp and Sharp  
Peter Paul Cadbury  
Towson State University  
U.S. Industries Corporation  
United States Post Office  
Wilmet Industries  
West Hampton Beach High School  
West Vaco VA. Elect. & Power  
Venture, Inc.  
W.W. Grainger  
UpJohn Company  
Washington Suburban Sanitary Commission  
Trinity High School  
Trenton State House  
University of Maryland  
York Hoover Corporation  
Wheaton Village  
W.R. Grace  
Washington Metro

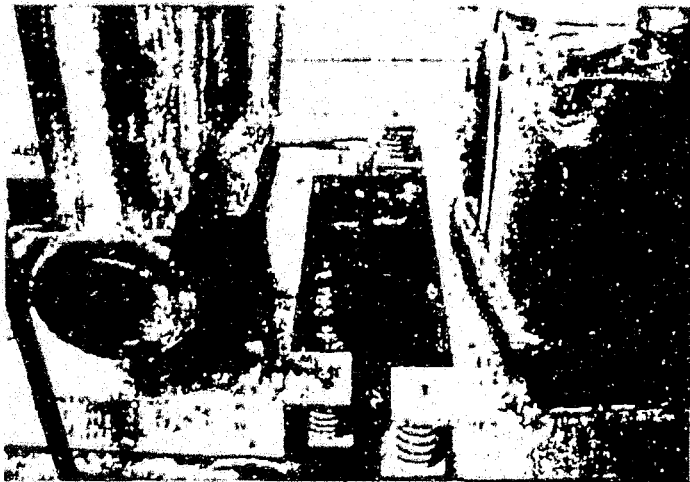
Revlon  
Playtex  
Rubberset Company  
State Farm Mutual Insurance Company  
Sberation Correctional Inst.  
Sun Oil Company  
Shell  
Spring City Knitting Mills  
Sheraton  
Spring City Foundry  
St. Louis County Hospital  
Southeastern Pa. Transp.  
Strawbridge & Clothier  
Ship and Shore  
Sperry Rand  
Stauffer's Hotel  
Tom's River Community Hospital  
Trexler Mall  
Three Mile Island  
United Engineers  
Western Berks. Water Authority  
Webster Industries  
U.S. Navy  
Western Electric Company  
Western Publishing  
University of Missouri  
United Technologies  
University of Pennsylvania Hospital  
Tenneco  
Thiokol Chemical  
Twin County Grocers  
Western Electric  
Waterbury Felts  
Westinghouse  
Victoria Station Restaurant



Normally such sound isolation devices are installed on pumps located near houses



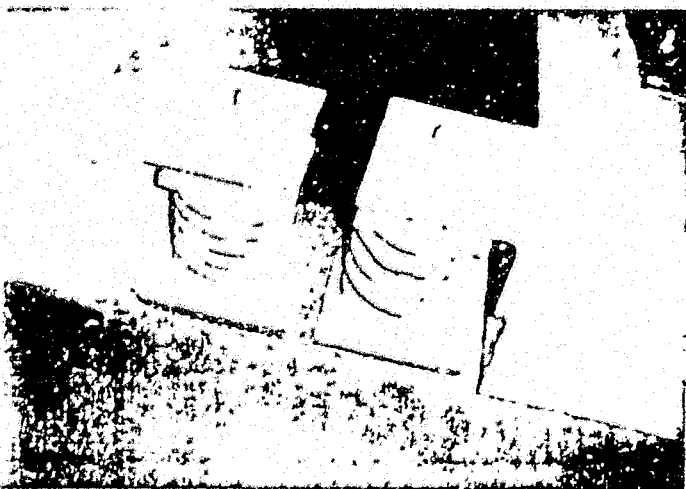
Normally such sound isolation devices are installed on pumps located near houses



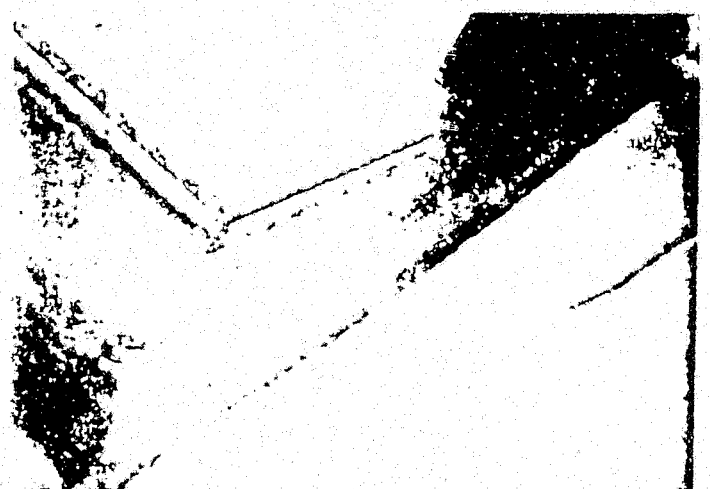
Normally such sound isolation devices are installed on pumps located near houses



Normally such sound isolation devices are installed on pumps located near houses



Normally such sound isolation devices are installed on pumps located near houses



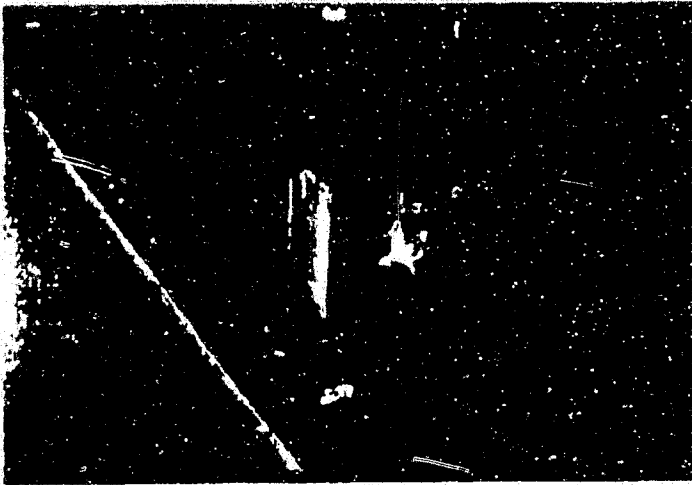
Normally such sound isolation devices are installed on pumps located near houses



Normally such sound isolation devices are installed on pumps located near houses



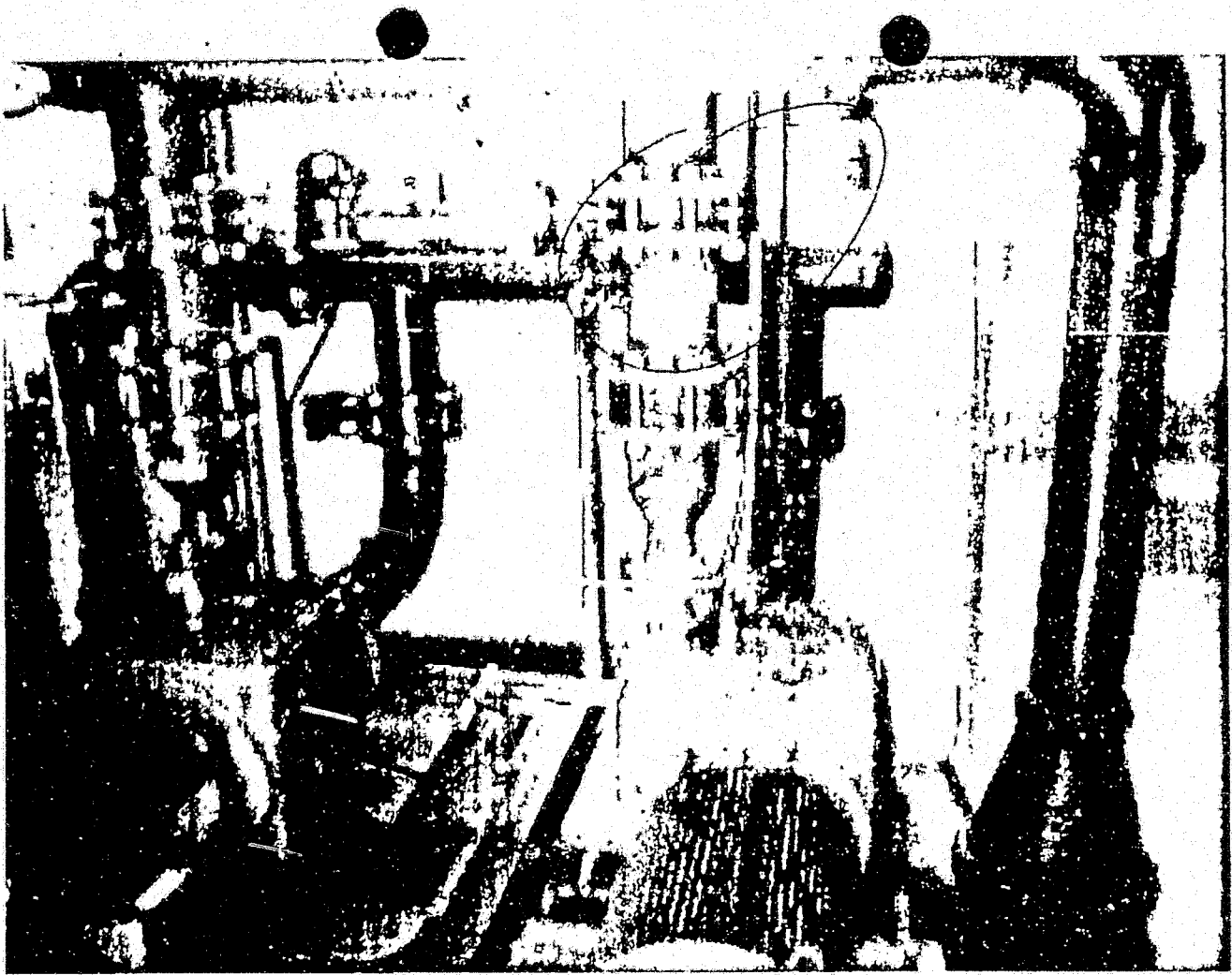
Normally such sound isolation devices are installed on pumps located near houses



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Normally such sound isolation devices are installed on pumps located near houses

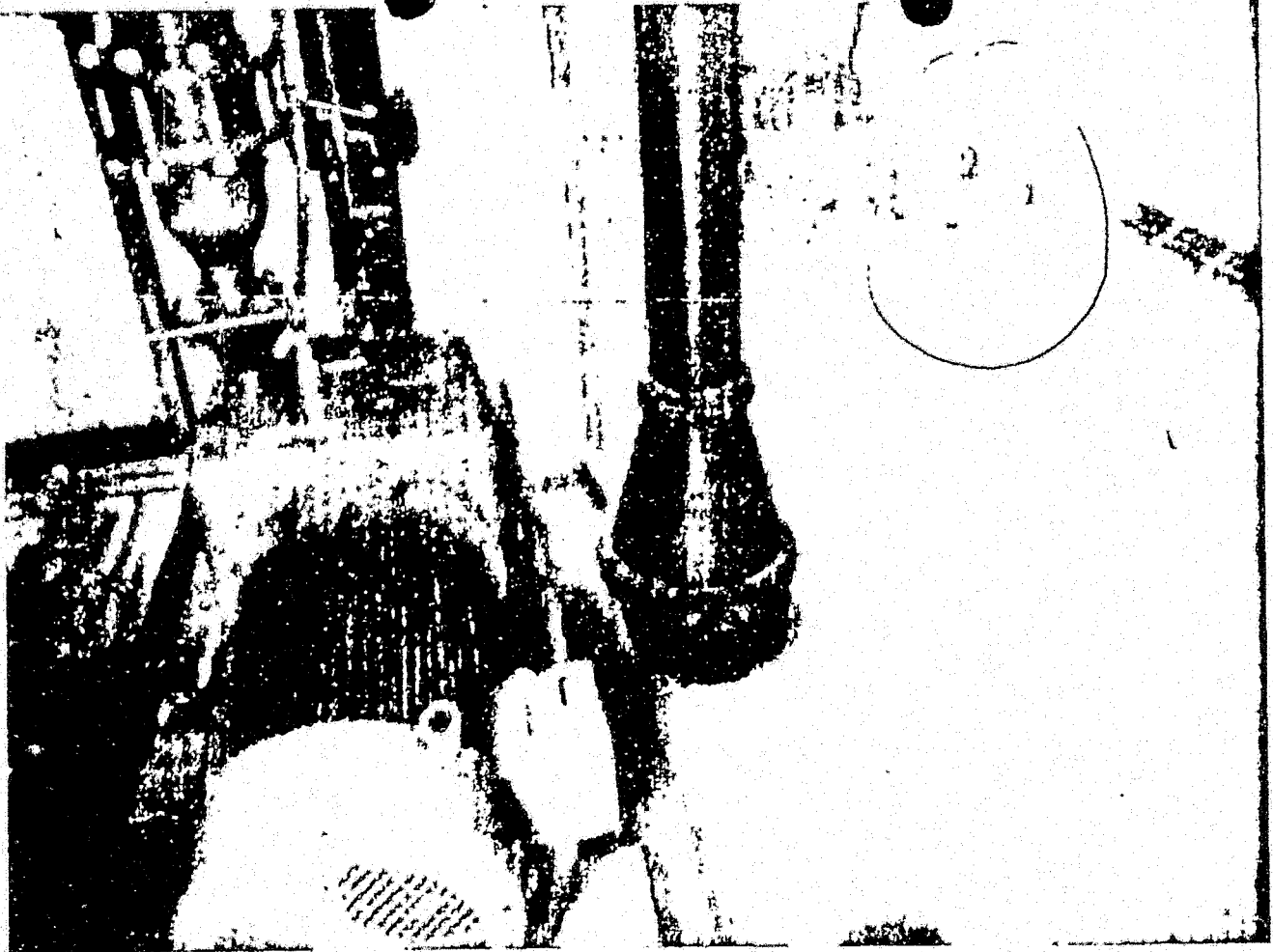


South Whitehall's pumps

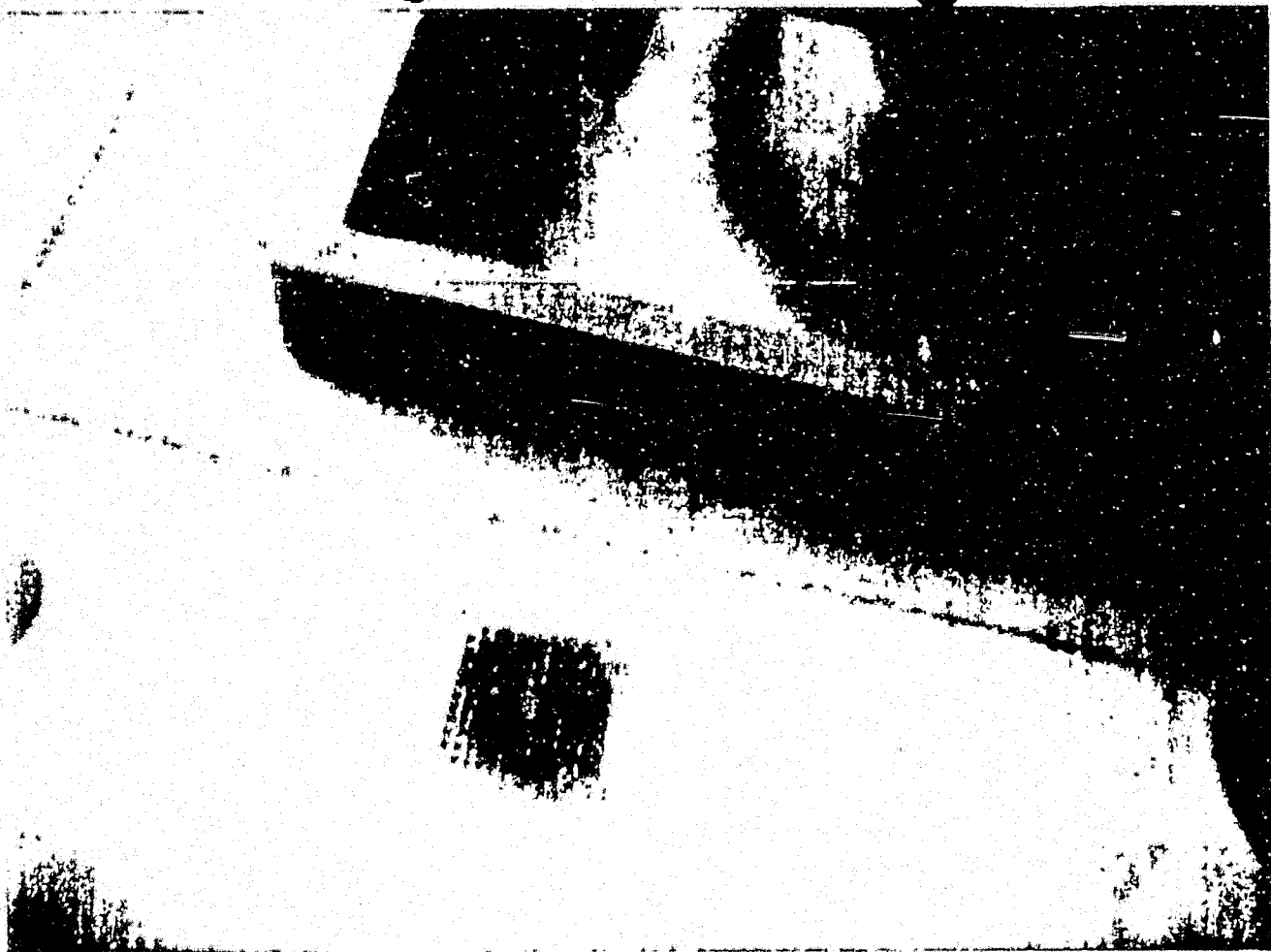
No insulation pads under  
the pumps

No sound isolators

No clamp, springs or other  
devices to control vibrations







POOR ORIGINAL



Crack where water pipe  
comes into the house.  
Unusual, in that it doesn't follow  
mortar joints.

4/4/07

Docket # 20055501

CERTIFICATE OF SERVICE

I hereby certify that the following were served a correct copy of Exceptions - Linda L. David - Complainant by depositing same in the U.S. mail, regular first class, as follows:

Administrative Law Judge Charles E. Rainey, Jr.  
1302 Philadelphia State Office Building  
1400 West Spring Garden Street  
Philadelphia PA 19130

Anthony R. Sherr, Esquire  
3031 Walton Road, Building A  
Suite 330 P.O. Box 1547  
Blue Bell, PA 19422

Attorney for South Whitehall

Anthony D Kanagy Esquire  
Post & Schell  
17 North Second Street 12<sup>th</sup> Floor  
Harrisburg, PA 17101-1601

Counsel for Respondent PPL

South Whitehall Township Authority  
444 Walbert Avenue  
Allentown PA 18104

Respondent

MARTIN J. DANKS, ESQUIRE  
Assistant City Solicitor  
I.D. #71890  
City of Allentown  
435 Hamilton Street Room 519  
Allentown PA18101

*Martin J. Danks*



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717-731-1970 Main  
717-731-1985 Fax  
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Anthony D. Kanagy  
akanagy@postschell.com  
717-612-6034 Direct  
File #: 2507/126966

December 20, 2006

BY FEDERAL EXPRESS

Honorable Charles E. Rainey, Jr.  
Administrative Law Judge  
Pennsylvania Public Utility Commission  
Philadelphia State Office Building  
1400 West Spring Garden Street, Room 1302  
Philadelphia, PA 19130

DOCUMENT  
FOLDER

RECEIVED  
2006 DEC 20 PM 3:44  
PA PUC  
SECRETARY'S BUREAU

RE. **Linda L. David v. PPL Electric Utilities Corporation and  
South Whitehall Township (Joined as an Indispensable Party) and  
City of Allentown (Joined as an Indispensable Party)  
Docket No. C-20055501**

Dear Judge Rainey:

This letter is provided on behalf of PPL Electric Utilities Corporation ("PPL Electric") in response to the correspondence dated December 1, 2006 from Alan A. Loch to Your Honor, Kristie M. Rippke, P.E. and James Franklin Balliet in the above-referenced proceeding.

Mr. Loch's correspondence is improper and should not be used as evidence in this proceeding. PPL Electric recognizes that Ms. David is a *pro se* complainant and that the Pennsylvania Public Utility Commission ("Commission") provides a certain degree of latitude to *pro se* complainants regarding procedural rules. However, Mr. Loch's correspondence goes beyond these bounds.

Section 5.431 of the Commission's regulations, 52 Pa. Code § 5.431, provides as follows:

(a) The record will be closed at the conclusion of the hearing unless otherwise directed by the presiding officer or the Commission.

(b) After the record is closed, additional matter may not be relied upon or accepted in the record unless allowed for good cause shown by the presiding officer or the Commission upon motion.

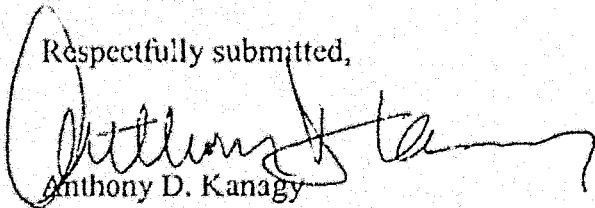
Honorable Charles E. Rainey, Jr.  
December 20, 2006  
Page 2

The hearing in the above-referenced proceeding was concluded on November 30, 2006, and pursuant to Section 5.431(a), the record closed at the conclusion of the hearing. Mr. Loch's correspondence was sent after the close of hearing, and therefore under Section 5.431(b) above, may not be relied upon or accepted into the record unless allowed for good cause shown by Your Honor or the Commission upon motion. Ms. David did not make a motion to allow this additional matter for good cause, and in fact good cause does not exist. Ms. David had a full and fair opportunity to present her case at the hearing, including the opportunity to cross-examine PPL Electric's witness, Mr. Rippke. Neither Ms. David, nor her witness Mr. Loch, should be permitted to continue to submit evidence on topics that were or could have been addressed at the hearing. This is especially true because PPL Electric does not have the opportunity to cross-examine Mr. Loch with regard to his conclusions or to submit evidence in response.

In addition, as was the case at the hearing, Mr. Loch's assertions are based on speculation and not actual evidence. As such, Mr. Loch's assertions should not be accepted. Moreover, PPL Electric has reviewed Mr. Loch's assertions and disagrees with his analysis.

For the reasons stated above, PPL Electric respectfully requests that Mr. Loch's extra-record correspondence dated December 1, 2006, not be admitted into evidence or relied upon in reaching a decision in the above-referenced proceeding. In addition, PPL Electric requests that all further correspondence from Ms. David or Mr. Loch in this proceeding be served directly on the undersigned counsel.

Respectfully submitted,



Anthony D. Kanagy

ADK:skr

cc: Certificate of Service  
James J. McNulty

**CERTIFICATE OF SERVICE**

I hereby certify that true and correct copies of the foregoing document have been served upon the following persons, in the manner indicated, in accordance with the requirements of § 1.54 (relating to service by a participant).

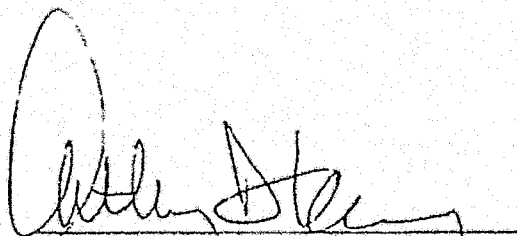
**VIA FIRST CLASS UNITED STATES MAIL**

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Assistant City Solicitor  
City of Allentown  
435 Hamilton Street, Suite 519  
Allentown, PA 18101

Anthony R. Sherr, Esquire  
Mayers, Mennies & Sherr  
3031 Walton Road  
P.O. Box 1547  
Blue Bell, PA 19422-0440

Date: December 20, 2006



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akanagy@postschell.com  
717-612-6034 Direct  
File # 2507/126966

January 9, 2007

## DOCUMENT FOLDER

BY FEDERAL EXPRESS

Honorable Charles E. Rainey, Jr.  
Administrative Law Judge  
Pennsylvania Public Utility Commission  
Philadelphia State Office Building  
1400 West Spring Garden Street, Room 1302  
Philadelphia, PA 19130

RE: **Linda L. David v. PPL Electric Utilities Corporation and  
South Whitehall Township (Joined as an Indispensable Party) and  
City of Allentown (Joined as an Indispensable Party)  
Docket No. C-20055501**

**DOCKETED**  
OCT 25 2007

Dear Judge Rainey:

This letter is provided by PPL Electric Utilities Corporation ("PPL Electric") in response to the letter sent to Your Honor by Ms. Linda David on December 23, 2006 in the above-referenced proceeding. The purpose of Ms. David's letter is to request that the letter sent by Mr. Alan Loch dated December 1, 2006 be admitted as evidence in the above-referenced proceeding. For the reasons stated below and for the reasons explained in PPL Electric's letter dated December 20, 2006, Ms. David's request should be denied.

According to Ms. David's December 23, 2006 letter, the basis for her request to enter Mr. Loch's letter into the record is that Ms. David did not receive Exhibit No. 2 to South Whitehall Township Authority Statement No. 2 ("Balliet Exh. No. 2") prior to the hearing. PPL Electric notes that it received Balliet Exh. No. 2 prior to the hearing and that per the certificate of service from South Whitehall Township Authority ("Authority"), Ms. David was hand delivered a copy of the Authority's testimony and exhibits on November 15, 2006. In any event, even if Ms. David did not receive a copy of Balliet Exh. No. 2 prior to the hearing, Mr. Loch's letter, as it relates to PPL Electric, should not be entered into the record.

In his December 1, 2006 letter, Mr. Loch's statements under Section 2 relate to potential magnetic fields, capacitor banks and harmonics in variable speed pumps. These statements are completely unrelated to Balliet Exh. No. 2, which provides the number of gallons of water pumped each day by the pumping station for the year 2004. As such, Ms. David's request that

ALLENTOWN HARRISBURG LANCASTER PHILADELPHIA PITTSBURGH PRINCETON WASHINGTON D.C.

A PENNSYLVANIA PROFESSIONAL CORPORATION

CPH 36091791

**BTL**

Honorable Charles E. Rainey, Jr.

January 9, 2007

Page 2

Mr. Loch's correspondence be entered into evidence because she did not receive Balliet Exh. No. 2 prior to the hearing should be denied. At a minimum, the Commission should strike Section 2 of Mr. Loch's December 1, 2006 letter because it is unrelated to Balliet Exh. No. 2. Ms. David had an opportunity to raise the issues contained in Section 2 of Mr. Loch's December 1, 2006 letter at the hearing. In fact, Ms. David did raise the issues regarding potential magnetic fields and capacitor banks, and Ms. David should not be allowed to continue to present testimony on these issues after the hearing.

In addition, the claims that Mr. Loch and Ms. David make regarding water pumping volumes are incorrect. In his December 1, 2006 letter, Mr. Loch asserts that the pumping rate at the pumping station while he was monitoring vibrations at Ms. David's house is lower than any other comparable period during the year. Based upon a review of Balliet Exh. No. 2, Mr. Loch's assertions are clearly wrong. Mr. Loch's calculations appear to be based on the 11 day period from September 14 through September 24, 2004, and Mr. Loch states that the average water pumped per day was 114,000 gallons. (The average is actually 115,017 gallons for this time period.) For the 11 day period from March 14 through March 24, 2004, the average water pumped per day was 74,208 gallons. This is a comparable period and the pumping rate is lower than the period Mr. Loch claims is abnormal. Likewise, for the period from January 14 through January 24, 2004, the average is 64,791 gallons per day, which is also lower than the period selected by Mr. Loch. Mr. Loch's assertions are not supported by the facts and should not be entered into the record.

Likewise, in her December 23, 2006 letter, Ms. David claims that the water pumping rates were lower in July of 2006 when PPL Electric placed a monitor on her electric meter. Ms. David's claims are completely unsupported by Balliet Exh. No. 2 because this exhibit only provides water pumping data for 2004 and not 2006. The Commission should give no weight to Ms. David's unsupported assertions.

In her December 23, 2006 letter, Ms. David also alleges that PPL Electric and South Whitehall Township "worked together on this project to put the pump station in place." This statement is also unsupported by the record and incorrect. PPL Electric did not work with the Authority to put the pumping station in place other than to provide electric service to the pumping station pursuant to PPL Electric's obligation as a public utility. Moreover, based on the extensive testing that PPL Electric performed both at the pumping station and at Ms. David's residence, which is all provided in the record, PPL Electric's service to the pumping station and to Ms. David's residence is safe and reasonable and meets all applicable code provisions.

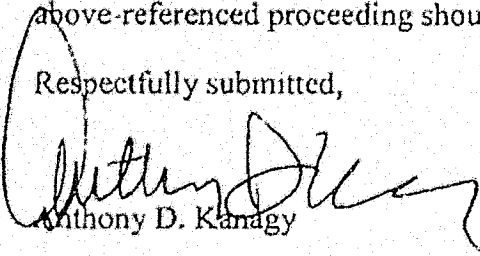
Honorable Charles E. Rainey, Jr.

January 9, 2007

Page 3

Based upon the reasons stated above and the reasons stated in PPL Electric's December 20, 2006 letter, Ms. David's request to enter Mr. Loch's December 1, 2006 letter into the record in the above-referenced proceeding should be denied.

Respectfully submitted,

  
Anthony D. Kanagy

ADK/jl

cc: Certificate of Service  
James J. McNulty, Secretary

## CERTIFICATE OF SERVICE

I hereby certify that true and correct copies of the foregoing document have been served upon the following persons, in the manner indicated, in accordance with the requirements of § 1 54 (relating to service by a participant).

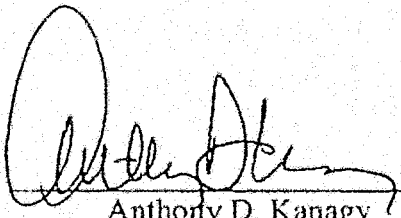
### VIA FIRST CLASS UNITED STATES MAIL

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Date: January 9, 2007



Anthony D. Kanagy