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COMMONWEALTH OF PENNSYLVANIA  
PUBLIC UTILITY COMMISSION

4 LINDA L. DAVID : DOCKET NO. C-20055501

5 vs. :

6 PPL ELECTRIC UTILITIES :

7 Hearing

8 Pages 1 through 195

9  
10 DOCUMENT  
FOLDER

State Office Building  
1400 Spring Garden Street  
Philadelphia, Pennsylvania 19130  
Thursday, November 30, 2006  
Commencing at 10:15 a.m.

11  
12  
13 Before: CHARLES E. RAINEY, Administrative Law Judge

14  
15 APPEARANCES:

16 ANTHONY KANAGY, Esquire

ANTHONY SHERR, Esquire

17 MARTIN J. DANKS, Esquire

LINDA L. DAVID

**DOCKETED**

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2 I N D E X

3 \* \* \*

4 WITNESS: Linda L. David

5 QUESTIONED BY: DIRECT CROSS REDIRECT RECROSS

6 Mr. Kanagy 48

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7 Mr. Danks 60

8 WITNESS: Alan Loch

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16 WITNESS: Gerald Gasda

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18 Miss David 137

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20 WITNESS: James Balliet

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1	WITNESS:	Kristie Rippke			
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ADMITTED

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South Whitehall Statement #1 ✓

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South Whitehall Twp Authority ✓

Statement #1 and 3 attached exhibits ✓

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PPL Statement #1 ✓

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PPL Exhibits 1 through 10 ✓

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## PROCEEDINGS

\* \* \*

1 JUDGE RAINEY: Good morning. My  
2 name is Charles Rainey, and I'm the  
3 Administrative Law Judge assigned to  
4 this case. And this is the case of  
5 Linda L. David versus PPL Electric  
6 Utilities Corporation and South  
7 Whitehall Township joined as an  
8 indispensable party and the City of  
9 Allentown joined as an indispensable  
10 party and South Whitehall Township  
11 joined as an indispensable party.  
12 Docket number C-20055501. And I'll  
13 allow the parties at this time to  
14 introduce themselves for the record,  
15 and we'll start with you, Miss David.

16 MS. DAVID: My name is Linda L.  
17 David.

18 MR. KANAGY: Yes, your Honor.  
19 Anthony Kanagy, K-A-N-A-G-Y,  
20 representing PPL Electric Utilities  
21 Corporation.  
22  
23  
24

1 MR. SHERR: Anthony Sherr on behalf  
2 of South Whitehall Township and South  
3 Whitehall Township Authority.

4 MR. DANKS: Martin Danks,  
5 D-A-N-K-S, Assistant Solicitor, City of  
6 Allentown.

7 JUDGE RAINEY: Thank you. Miss  
8 David, as the Complainant in this case  
9 you have the burden of proving that  
10 you're entitled to the relief that you  
11 have requested. The procedure which  
12 we'll follow is you'll be given an  
13 opportunity to present testimony and in  
14 regard to your complaint your testimony  
15 will be subject to any questions I  
16 might have as well as any questions  
17 which Counsel for the opposing parties  
18 might have. You'll also have an  
19 opportunity to refer to the exhibits  
20 which you previously submitted in  
21 response to my order regarding written  
22 testimonies. Let me state also, Miss  
23 David, and we did address those  
24 exhibits while we were off the record

1 for all of the parties that submitted  
2 exhibits and statements, and I see you  
3 do have your exhibits that are marked  
4 as exhibits 1 through 5D, 24 total.  
5 And what we'll do is we'll call those  
6 Complainant Exhibit 1, et cetera, et  
7 cetera, et cetera to distinguish your  
8 exhibits from the exhibits of the other  
9 parties.

10 With that, Miss David, if you're  
11 comfortable there you can stay there or  
12 you can take the witness table there.

13 MS. DAVID: I think I'll stay with  
14 the papers.

15 JUDGE RAINEY: Okay. That's fine.  
16 Do you have any questions with regard  
17 to either your burden of proof or the  
18 procedure that we'll follow this  
19 morning?

20 MS. DAVID: I just was not sure  
21 what I was expected to do here as a lay  
22 person, so I figured I would just go  
23 through the deposition and explain the  
24 exhibits; is that correct?

1 JUDGE RAINEY: That's fine if you  
2 think that would best serve your case.  
3 We'll allow you to do that and  
4 certainly feel comfortable --

5 MS. DAVID: It's all the testing  
6 that I had done. That's all I have.

7 JUDGE RAINEY: Many people come  
8 before the Commission without counsel,  
9 so please don't allow that to be a  
10 burden for you. With that, why don't  
11 you stand and raise your right hand and  
12 I'll swear you in.

13 \* \* \*

14 LINDA L. DAVID,  
15 after having been first duly sworn, was  
16 examined and testified as follows:

17 \* \* \*

18 E X A M I N A T I O N

19 \* \* \*

20 JUDGE RAINEY: Provide your full  
21 name for the record.

22 MS. DAVID: Linda L. David,  
23 D-A-V-I-D.

24 JUDGE RAINEY: And would you

1 provide your address?

2 MS. DAVID: 2922 West Fairview  
3 Street, one word, Allentown,  
4 Pennsylvania, 18133.

5 JUDGE RAINEY: I'm going to ask you  
6 to keep your voice up, Miss David. Why  
7 don't you explain for us the nature of  
8 your complaint.

9 MS. DAVID: I purchased the house  
10 13 years ago and I lived there for 13  
11 years and I had no problem with the  
12 water service or electrical service or  
13 anything until 2003. And then cracks  
14 began appearing in the house and I felt  
15 vibrations in the floor system. So I  
16 had contacted a structural engineer and  
17 he did come and he looked through the  
18 house. He was in the attic, he was  
19 under the house and the crawl space,  
20 everywhere. And he suggested to put a  
21 knee wall in the attic for added  
22 support.

23 JUDGE RAINEY: What kind of wall?

24 MS. DAVID: Knee wall. I guess

1 when the house was built that was not  
2 required, but because it has a gable  
3 roof it needs that extra support.

4 JUDGE RAINEY: Gable, G-A-B-L-E?

5 MS. DAVID: G-A-B-L-E. So I had  
6 Grade A Remodeling Company come to do  
7 that. The first two exhibits I had  
8 were the deed to the property.

9 JUDGE RAINEY: These are  
10 Complainant Exhibits 1 and 2.

11 MS. DAVID: The second one is the  
12 map. I had gone down to the County  
13 Assessment office for the map of where  
14 the house is.

15 JUDGE RAINEY: That's exhibit  
16 Number 2.

17 MS. DAVID: Yes. There are  
18 paragraphs on there about the PPL  
19 easement and right of way, but I know  
20 you can't read it, because the map was  
21 so old it didn't print out very  
22 clearly. But it does show on that map  
23 where I live in relation to the pumping  
24 station. Then the third one is the

1 report from the structural engineer.

2 JUDGE RAINEY: That's Exhibit 3A?

3 MS. DAVID: Yes.

4 JUDGE RAINEY: Do you want to  
5 explain the conclusion or the nature of  
6 what this letter is?

7 MS. DAVID: Well, he had  
8 recommended the knee wall be put in the  
9 attic, which was done. He also  
10 suggested on the second page, Page 2,  
11 that the piers underneath the house  
12 needed support shims, S-H-I-M-S, which  
13 I had taken wooden posts out under the  
14 house and replaced them, because they  
15 told me to do that, because of termites  
16 coming into the house. There were no  
17 termites but they said if I didn't take  
18 the wood out I would eventually get  
19 that. So they were replaced, but he  
20 said they didn't have the shims at the  
21 top for the support, so that also was  
22 suggested and it says "I suspect this  
23 repair will do much to reduce the  
24 vibrations you are feeling in the floor

1 system." So that was done.

2 JUDGE RAINEY: This all occurred I  
3 see the letter's dated October 26th,  
4 2003.

5 MS. DAVID: Yes, 2003.

6 JUDGE RAINEY: Things were done.  
7 When were they done?

8 MS. DAVID: Well, when were they  
9 done?

10 JUDGE RAINEY: If you know.

11 MS. DAVID: I don't remember right  
12 now. I do have the papers.

13 JUDGE RAINEY: Go ahead.

14 MS. DAVID: I do know. I'm sorry.  
15 3B is the paper from the Grade A  
16 Remodeling Company, and that says  
17 October 29th, 2003.

18 JUDGE RAINEY: Okay. Go ahead with  
19 your testimony.

20 MS. DAVID: So that was done. He  
21 also indicated at the bottom of Page 2  
22 of the structural engineer's report, "I  
23 find the house to be structurally in  
24 good condition."

1 JUDGE RAINEY: You're referring  
2 again to Exhibit 3A.

3 MS. DAVID: Yes. But after the  
4 work was done the problem continued.  
5 The house continued to crack and I kept  
6 feeling the vibrations through the  
7 floors and the countertops. If you  
8 stood too long in one place you could  
9 feel it even in a chair.

10 JUDGE RAINEY: You said this all  
11 was occurring in 2003 and you had been  
12 in the house for how long before that?

13 MS. DAVID: I purchased the home in  
14 '93. It was built in '73.

15 JUDGE RAINEY: So you had been in  
16 the home since '93 with no problems  
17 until 2003?

18 MS. DAVID: Right.

19 JUDGE RAINEY: Go on, Miss David.

20 MS. DAVID: Then I could even feel  
21 it outside on the deck. If you leaned  
22 on the deck railing you could feel the  
23 house bouncing, if you would. I guess  
24 that's the best word I could use to

1 describe it. Then things got worse.  
2 In January of 2004 I felt like  
3 electricity was coming through the  
4 house and I would wake up crying  
5 because of the electrical intensity. I  
6 can't exactly explain what it felt like  
7 but I called I guess first the Veterans  
8 clinic, which is down the street from  
9 where I live. And I thought maybe they  
10 had a problem with their generator, and  
11 he said they don't even use it except  
12 for in an emergency. But he sent the  
13 property manager to my home.

14 JUDGE RAINEY: This was the  
15 Veterans Administration?

16 MS. DAVID: Yes. It's a Veterans  
17 clinic that was just built I think  
18 around 2000. I'm not sure of the exact  
19 date.

20 JUDGE RAINEY: How far away from  
21 your home is that?

22 MS. DAVID: About 200 feet.

23 JUDGE RAINEY: Just so I  
24 understand, in 2003 you started

1                   experiencing some problems. It felt  
2                   like bouncing and vibrations.

3                   MS. DAVID: Right.

4                   JUDGE RAINEY: Then in January 2004  
5                   you felt as if electricity was coursing  
6                   through your home.

7                   MS. DAVID: Right.

8                   JUDGE RAINEY: But you had not  
9                   experienced that in 2003?

10                  MS. DAVID: No. And then I  
11                  called -- well, after the property  
12                  manager came to my home, he did come  
13                  twice, and the first time he said he  
14                  didn't feel anything.

15                  JUDGE RAINEY: This is the property  
16                  manager for the Veterans clinic.

17                  MS. DAVID: Right.

18                  JUDGE RAINEY: When was he at your  
19                  home?

20                  MS. DAVID: Well, it was January of  
21                  2004.

22                  JUDGE RAINEY: So initially he said  
23                  he did not feel anything.

24                  MS. DAVID: He didn't feel

1 anything. But I said I could hear the  
2 pumps, which I could. In fact, in the  
3 summer prior to that I had also called  
4 to report the noise and I thought it  
5 belonged to South Whitehall, so I  
6 called the township and I said couldn't  
7 they turn it down. Because it sounded  
8 like a car engine running all night  
9 long, and it was very loud.

10 JUDGE RAINEY: So after initially  
11 having contacted the Veterans clinic  
12 because you thought the problem derived  
13 with them --

14 MS. DAVID: I thought it was maybe  
15 their generator. They have generators  
16 in the back.

17 JUDGE RAINEY: However, you  
18 surmised, or learned, that the problem  
19 was not coming from the Veterans  
20 clinic.

21 MS. DAVID: They said they didn't  
22 use those except in an emergency. But  
23 they did send the property manager to  
24 my home. And he came a second time and

1 brought his girlfriend with him and she  
2 could feel it in my living room,  
3 through her legs right through the  
4 floor, as I did.

5 JUDGE RAINEY: That was in  
6 January 2004?

7 MS. DAVID: Yes. And I also told  
8 him at that time that the whole  
9 property -- you could feel the ground  
10 shaking out in the driveway, and he  
11 said yeah. But then I never heard from  
12 him again.

13 MR. KANAGY: Just to clarify, your  
14 Honor, she said that the person could  
15 feel "it" and I'm not sure what "it"  
16 is.

17 MS. DAVID: The vibrations, I think  
18 she was feeling.

19 MR. SHERR: If I may, just to lodge  
20 an objection, I realize we are giving  
21 leeway, but the hearsay statements that  
22 Mrs. David is making, we would like to  
23 object to all those statements, and  
24 understanding we are giving leeway to

1 Miss David because of her pro se.

2 JUDGE RAINEY: Sure. No finding  
3 can be based solely on hearsay  
4 testimony. But with that having been  
5 said, go ahead with your testimony, Ms.  
6 David.

7 MS. DAVID: Then after I felt that  
8 it was electricity that was coming into  
9 the house as well as vibrations I also  
10 woke up with my face like it looked  
11 burnt, but it was just a red reaction  
12 to either a magnetic field or stray  
13 voltage.

14 JUDGE RAINEY: When was that, Ms.  
15 David?

16 MS. DAVID: When? Again in 2004,  
17 in the winter of 2004. Was very bad  
18 for about six months.

19 JUDGE RAINEY: January, February  
20 period?

21 MS. DAVID: Yes. And I did call  
22 PPL and they told me I would have to  
23 investigate on my own. And I called  
24 and repeatedly called to say I felt

1           like I was being electrocuted in my  
2           home and they would not send anybody.

3           JUDGE RAINEY:  When you say you  
4           experienced burns on your face this is  
5           while you were lying in bed?

6           THE WITNESS:  In the morning I  
7           would wake up, in the middle of the  
8           night it would be like that.  Sometimes  
9           sitting on a chair in the TV room.  It  
10          was horrible.  And I wrote to a friend  
11          of mine in Grants Pass Oregon.  She's a  
12          nurse, and she got on her computer and  
13          contacted the EPA in Philadelphia and  
14          then they agreed to come to my home.  
15          And that was June of 2004.

16          JUDGE RAINEY:  So June of 2004 the  
17          EPA came to your home.

18          MS. DAVID:  Right.  They sent two  
19          project engineers.  I know Fran  
20          Dougherty was one engineer.  I don't  
21          know the name of the other one.

22          JUDGE RAINEY:  What was the upshot  
23          of their visit?

24          MS. DAVID:  He felt that there was

1                   stray voltage.

2                   MR. KANAGY: You Honor, I would  
3                   like to note my objection to the  
4                   hearsay from the EPA.

5                   JUDGE RAINEY: So noted.

6                   MS. DAVID: They did testing at my  
7                   home.

8                   JUDGE RAINEY: The EPA did.

9                   MS. DAVID: Yes. They only had one  
10                  report, however, one letter. It's in  
11                  the folder with letters. And that one  
12                  letter indicated at the one point that  
13                  they found low stray voltage readings  
14                  everywhere excepting from the  
15                  transformer pole leading into my home.

16                  JUDGE RAINEY: That's one of your  
17                  exhibits?

18                  MS. DAVID: Yes.

19                  MR. SHERR: It's 3E.

20                  MS. DAVID: Yes. I starred where  
21                  it says "Except near the transformer  
22                  pole that services the block." He had  
23                  put a device, and I don't know what the  
24                  device was, a hand-held device. In my

1 laundry room there is a closet and  
2 inside the closet he put that up there  
3 where the overhead wire comes to the  
4 roof of the home, and he said, "Oh,  
5 that is high." So I don't know what  
6 the reading was. I don't have the  
7 number, but I do have this letter  
8 saying that the transformer pole that  
9 services the dwelling was the culprit  
10 there. I called them again and Fran  
11 Dougherty had already retired, so she  
12 said she could not give me his name and  
13 number, for privacy reasons.

14 JUDGE RAINEY: Fran Dougherty is  
15 with the EPA?

16 MS. DAVID: Yes. She said she  
17 would look through their files, but she  
18 couldn't tell me anything until she  
19 contacted their lawyer.

20 After that something was done and  
21 someone somehow collected that stray  
22 voltage, because it then stopped, that  
23 feeling of being electrocuted in the  
24 house.

1 JUDGE RAINEY: When did it stop?

2 MS. DAVID: June of 2004.

3 JUDGE RAINEY: So after the EPA  
4 engineers' visit in June of 2004 it  
5 stopped in June of 2004?

6 MS. DAVID: Yes. But there were  
7 six months where I slept in the car in  
8 the garage on a number of occasions. I  
9 took the cat to the Days Inn a number  
10 of times and I left and took day trips  
11 to get out of there as often as I  
12 could. It was not pleasant in the  
13 house.

14 JUDGE RAINEY: Do you know if any  
15 of these persons from the EPA was in  
16 contact with any of the parties here?

17 MS. DAVID: I do not. But I  
18 believe they did contact somebody.

19 JUDGE RAINEY: Please continue with  
20 your testimony.

21 MS. DAVID: After the electrical  
22 stray voltage I believe that was  
23 gathered stopped the vibrations in the  
24 house still kept cracking. You could

1 hear it at night and you could feel it.

2 JUDGE RAINEY: These were  
3 vibrations without the coursing of  
4 electricity?

5 MS. DAVID: Right. So from there I  
6 had called -- because I thought it was  
7 that pumping station behind the  
8 Veterans clinic, I heard it and I had  
9 complained about the noise, and I asked  
10 my neighbor -- there is only one house  
11 closer to it than mine, she said they  
12 did not hear it but they could feel it  
13 and I --

14 JUDGE RAINEY: This is the South  
15 Whitehall Township Authority operated  
16 pumping station?

17 MS. DAVID: Right. It's right  
18 behind the Veterans clinic.

19 JUDGE RAINEY: How far away from  
20 your house is it?

21 MS. DAVID: Two hundred feet, I  
22 think.

23 JUDGE RAINEY: This is located on  
24 Hamilton Street?

1 MS. DAVID: The Veterans clinic is  
2 on Hamilton Boulevard. When I had  
3 called the township, likewise they said  
4 they were too busy. And Mr. Uff said  
5 he couldn't tone the noise down in the  
6 wintertime. He said it would have to  
7 wait for warmer weather.

8 JUDGE RAINEY: When did you contact  
9 the township?

10 MS. DAVID: That was back in  
11 January 2004, when I called not only  
12 PPL but the township as well.

13 JUDGE RAINEY: That was before the  
14 visit of the EPA?

15 MS. DAVID: Yes. And then they  
16 suggested that perhaps it was blasting  
17 being done in the area to build a lot  
18 of the new homes in our area. So I had  
19 also called a source in Bethlehem and  
20 that woman told me to call the DEP  
21 blasting division in Pottsville, and so  
22 I did that.

23 JUDGE RAINEY: You called a source  
24 in Bethlehem?

1 MS. DAVID: I'm not sure if it was  
2 an environmental group. I'm not sure  
3 who I called, to tell you the truth.  
4 But the DEP did then send a blasting  
5 inspector to my home.

6 JUDGE RAINEY: This is the State  
7 Department of Environmental Protection.

8 MS. DAVID: Yes.

9 JUDGE RAINEY: When did that occur?  
10 You said this is a DEP blasting  
11 inspector?

12 MS. DAVID: Yes. That's Exhibit  
13 3C. They found Ed Ween(ph) Drilling  
14 and Blasting in violation of setting  
15 off too many explosives in one  
16 timeframe. And a notice of violation  
17 was sent to them. However, he did not  
18 think --

19 JUDGE RAINEY: Was sent to?

20 MS. DAVID: Ed Ween Drilling and  
21 Blasting. However, he did not think  
22 the damages to my home were from  
23 blasting.

24 JUDGE RAINEY: I see a handwritten

1 letter from you dated October 29th,  
2 2004, I see, and the complaint  
3 investigation description, which is the  
4 next page, is dated October 13th, 2004.

5 MS. DAVID: Right.

6 JUDGE RAINEY: All this occurred  
7 within that time period; is that  
8 correct?

9 MS. DAVID: Yes. He said if the  
10 blasting were the source of my problems  
11 at the house the windows in my home  
12 would have blown out first, and  
13 they're not.

14 JUDGE RAINEY: So the blasting  
15 wasn't the cause of the problem.

16 MS. DAVID: Right. But he did list  
17 all the damages in my home. He said he  
18 had an opinion, but he legally could  
19 not express that opinion. And what I  
20 starred on that exhibit was -- the  
21 first one, a crack is parallel to a  
22 repaired crack. So that after I had  
23 the work done from Grade A Remodeling  
24 there is a huge crack right next to

1                   where the work was done and more. And  
2                   then I also starred where areas are  
3                   beginning to buckle, he has nail pops  
4                   are beginning to show, molding is  
5                   beginning to pull away. And all this  
6                   was not there when I moved into the  
7                   house.

8                   JUDGE RAINEY: But you're saying  
9                   that the finding was that the blasting  
10                  was not the cause of these problems.

11                 MS. DAVID: That's what he said.

12                 JUDGE RAINEY: When again did you  
13                  start experiencing these cracks and  
14                  things?

15                 MS. DAVID: There were some cracks  
16                  that were visible in the closets and  
17                  things prior to this whole incident,  
18                  but there are a lot of new ones over  
19                  the doorways and things that were  
20                  happening and I did not know why and I  
21                  was trying to get to the bottom of what  
22                  was happening.

23                 JUDGE RAINEY: So there were cracks  
24                  prior to 2003 when you first started

1 experiencing the problem.

2 MS. DAVID: Yes.

3 JUDGE RAINEY: But you said that  
4 they got worse over time since the  
5 2003?

6 MS. DAVID: Right. And some of  
7 those were repaired and then I got new  
8 ones next to the repaired ones.

9 JUDGE RAINEY: Go ahead with your  
10 testimony, Ms. David.

11 MS. DAVID: I had contacted several  
12 lawyers, I called environmental  
13 lawyers, which I was instructed to do.

14 JUDGE RAINEY: When you say  
15 instructed who instructed you?

16 MS. DAVID: Just someone said  
17 that's what I needed to do, because of  
18 the nature of the problem. My lawyer  
19 said he did not handle this kind of  
20 thing, Michael Henry. So he referred  
21 me to Pat Reilly in the same firm and  
22 his first recommendation was to get the  
23 magnetic field tested. Then after I  
24 had an environmentalist come from

1 Phillipsburg, New Jersey he had talked  
2 to the attorney and after that he said  
3 he couldn't help me.

4 JUDGE RAINEY: Who said he couldn't  
5 help?

6 MS. DAVID: The attorney, Pat  
7 Reilly. He said South Whitehall  
8 Township was difficult to deal with for  
9 decades and he wasn't going to handle  
10 the case. So I proceeded to another  
11 one and I actually came to Philadelphia  
12 and she kept my papers for 10 months  
13 and then dropped the case. And  
14 somewhere in here I have an Exhibit of  
15 hers where she sent a letter to the  
16 pump station company that put the pumps  
17 in, the Pitcock Company, and she had  
18 told them -- this was after we had  
19 found the pumps were not insulated, but  
20 I don't know why she dropped it after  
21 10 months, but she did. Then I called  
22 another environmental attorney and gave  
23 him the papers.

24 JUDGE RAINEY: Let me just say I

1 don't want to get so bogged down in  
2 terms of the attorneys with them not  
3 being here I don't want to  
4 unnecessarily prejudice them.

5 MS. DAVID: Just so you know I  
6 tried. Then Sal LaDuca, he was the  
7 environmentalist from Phillipsburg who  
8 came and he did test for the magnetic  
9 field. That was March of 2004.

10 JUDGE RAINEY: So he came to your  
11 house.

12 MS. DAVID: Yes, he did.

13 JUDGE RAINEY: Spell his name.

14 MS. DAVID: S-A-L, L-A, D-U-C-A.  
15 The only thing he was able to put down  
16 on paper was that all the power lines  
17 to my house also serve the pump  
18 station.

19 JUDGE RAINEY: This is also an  
20 Exhibit?

21 MS. DAVID: It is. In his report  
22 he explained that some people would be  
23 more sensitive to the pulsation, I  
24 guess if you want to call it that.

1 It's an exhibit but I can't find it  
2 right now. It was suggested to me also  
3 to get the heating ducts cleaned in the  
4 house. I did that.

5 JUDGE RAINEY: That was in?

6 MS. DAVID: That was after the  
7 environmentalist came. After March.  
8 There it is, Exhibit 3D is from the  
9 environmentalist. Then Air Care --  
10 well, the heating ducts were cleaned on  
11 June 17th of 2004, then another company  
12 in March of 2004, Air Care and  
13 Restoration, from Bethlehem,  
14 Pennsylvania came, because this white  
15 stuff was blowing all over the house.

16 JUDGE RAINEY: Was that related to  
17 the pulsations, vibrations?

18 MS. DAVID: I did not know, but I  
19 did not have it before. His findings  
20 were, and that Exhibit is 3G, the  
21 Overview, particles commonly sourcing  
22 from the outdoors ground or crawl space  
23 structural environment make up  
24 approximately he has 54 percent, and I

1 add it up as 44 percent, of the dust  
2 sample. It's quartz, calcite, mica,  
3 clay, and it's rock dust. He also  
4 recommended putting plastic over the  
5 stones underneath the house, over the  
6 rocks in the crawl space, but I did not  
7 do that, because I thought if you put  
8 plastic over that you would have mold  
9 perhaps growing, and that would be  
10 another problem which I did not want to  
11 have. I'm allergic to mold. And you  
12 could be very sick from that as well,  
13 so I did not do that.

14 Then I still, standing in the  
15 kitchen, like at the stove where you're  
16 cooking, if your feet were in one place  
17 too long my feet were getting hot and I  
18 thought something is very wrong here.  
19 And I discussed it with a friend, and  
20 her husband is an engineer with Verizon  
21 and he told me that Al Loch from  
22 Trinity Associates did troubleshooting  
23 for Verizon, so I should call him.

24 JUDGE RAINEY: Standing in the

1 kitchen you would feel heat?

2 MS. DAVID: In the floor system.

3 JUDGE RAINEY: Does this occur any  
4 other place in your house?

5 MS. DAVID: That's where I noticed  
6 it the most.

7 JUDGE RAINEY: Go ahead, Miss  
8 David.

9 MS. DAVID: I called this  
10 gentleman, Al Loch, and he said he  
11 would stop and he did. He was at my  
12 house twice. The first time it was  
13 just to examine the house, I guess.

14 JUDGE RAINEY: When was that?

15 MS. DAVID: That was February 2004  
16 and likewise, that's Exhibit 3H.

17 MR. KANAGY: Your Honor, I just  
18 want to note with regard to Exhibit 3H,  
19 Mr. Loch is here, so it's not  
20 testimony, but we have -- we do not  
21 believe Mr. Loch is qualified to  
22 testify. We may address that later,  
23 but I want to note my objection at this  
24 point up front. I note that on the

1 first page of the report of Exhibit 3H  
2 it listed Alan A. Loch, Project  
3 Engineer, and Mr. Loch is not a  
4 licensed engineer.

5 JUDGE RAINEY: So we have  
6 opportunity to address that with  
7 Mr. Loch in the cross-examination when  
8 he takes the witness stand. So we'll  
9 proceed right now with Miss David's  
10 testimony.

11 MR. KANAGY: Thank you, your Honor.

12 MS. DAVID: At the time of his  
13 first visit to my home he took pictures  
14 also of the cracks and damages of my  
15 home inside and out, because some of  
16 the bricks out front were also cracked.  
17 And the big one is right where the  
18 water pipe comes into the house. From  
19 there he had made contacts with  
20 Mr. Henning from the Pitcock Company,  
21 which they're the people that installed  
22 the pumps. So he called him and they  
23 were talking about perhaps the pumps  
24 were unbalanced or had no sound

1 isolators or the like to control  
2 vibration.

3 JUDGE RAINEY: These are the pumps  
4 that were operated by the South  
5 Whitehall Township Authority.

6 MS. DAVID: Right. But they all  
7 said everything was inspected and they  
8 all came with standard insulation and  
9 they were all equipped with pads and  
10 the like to --

11 JUDGE RAINEY: Who are you  
12 referring to?

13 MS. DAVID: The Pitcock Company,  
14 who put in the pumps.

15 JUDGE RAINEY: You said the Pitcock  
16 Company was associated with the  
17 Whitehall Township Authority.

18 MS. DAVID: I later learned  
19 they're the engineers for South  
20 Whitehall.

21 JUDGE RAINEY: When did all this  
22 occur?

23 MS. DAVID: It would be between  
24 February and April of 2004. Not only

1                   were there phone calls made, but there  
2                   was correspondence May 3rd of 2004 to  
3                   Steve Henning, manager environmental  
4                   division of the Pitcock Company, and  
5                   the letter is from Al Loch asking if  
6                   there were sound isolations in the  
7                   pipe.

8                   JUDGE RAINEY: You're referring to  
9                   an Exhibit?

10                  MS. DAVID: Yes. 3H.

11                  JUDGE RAINEY: Okay. Go ahead.

12                  MS. DAVID: I think it was finally  
13                  in June of 2004 PPL engineers came  
14                  testing for stray voltage.

15                  JUDGE RAINEY: They came in  
16                  response to what?

17                  MS. DAVID: Probably my phone  
18                  calls. I kept calling and saying there  
19                  was a problem. And perhaps Al Loch had  
20                  contacted PPL. I'm not sure.

21                  JUDGE RAINEY: He'll have an  
22                  opportunity to testify.

23                  MS. DAVID: In September of 2004 --

24                  JUDGE RAINEY: PPL engineers came

1 to your home and performed some tests?

2 MS. DAVID: Yes, for stray voltage.  
3 And they found low readings at that  
4 time. That letter was -- the report  
5 was written June 22, 2004.

6 JUDGE RAINEY: Are you referring to  
7 an exhibit?

8 MS. DAVID: Yes, 3J. I believe  
9 that first time Mr. Loch happened to  
10 come to my home that morning, so he was  
11 there when she came also. And there  
12 was discussion about the findings.  
13 Some of those tests were repeated in  
14 June of 2006, but I had noted the  
15 readings were like 10 times higher the  
16 first time but the engineer said they  
17 are still not supposed to be felt. The  
18 readings are low. But where the  
19 highest marks are or readings are  
20 that's where dead trees happened to be  
21 this summer.

22 JUDGE RAINEY: I notice that in  
23 what was marked as Exhibit 4C you  
24 referred to certain dead trees. I just

1 have the cover page. I don't have the  
2 pictures.

3 MS. DAVID: I think maybe to you I  
4 sent them in -- they were photographs  
5 in a white envelope. These are the  
6 trees. Do you want to see them?

7 JUDGE RAINEY: Had you made copies  
8 for the other parties attached to that  
9 cover page with the Exhibit on it?

10 MS. DAVID: I think he did. I  
11 don't know that you got the colored  
12 photographs, but maybe I sent copies,  
13 and I have them numbered on the back.  
14 There's a lot of them.

15 JUDGE RAINEY: Okay. Let me see  
16 them. Where is that located? Where  
17 are the trees located?

18 MS. DAVID: This is in the front of  
19 my property. And then in the back  
20 there's more, but this one had to be  
21 cut down and then those, the brown  
22 marks were starting to show through and  
23 I was not happy about that either. The  
24 rosebush is half dead and those are the

1 trees in the back near the transformer.  
2 There is the transformer above the  
3 house (indicating).

4 JUDGE RAINEY: I see. We may need  
5 some additional copies of those  
6 pictures. Okay. Go ahead with your  
7 testimony.

8 MS. DAVID: In September of 2004  
9 Mr. Loch said he could rent an analyzer  
10 to try to determine where the  
11 vibrations were coming from. I said I  
12 could hear the pumps and felt them at  
13 night especially, and so to make sure  
14 that's where it was coming from that's  
15 what we did. That test was done in  
16 this report.

17 JUDGE RAINEY: What's the Exhibit  
18 number?

19 MS. DAVID: It's 3I. The dates for  
20 that were September 13, 17, 23 and 24.  
21 And I may add, this gentleman and  
22 another engineer were down under my  
23 house for an entire day and when he  
24 came out of there he looked like he

1           came out of a cave. It's hot and tight  
2           under the house, and bless their heart  
3           for doing that. At that time when we  
4           did the testing he had discovered six  
5           amps of electricity were running on the  
6           water pipes and that's why my feet were  
7           getting hot I think in the kitchen. He  
8           then drilled ground rods into the rocks  
9           under the house. I don't know why he  
10          did that. He has to tell you why he  
11          did it. I just paid him to do it.

12                 Also, there was a day when  
13                 engineers from the township and the  
14                 water authority, not Allentown, South  
15                 Whitehall Authority, came and they said  
16                 they would shut the pumps down, turn  
17                 them off, and if I still felt the  
18                 vibrations then it wasn't their pumps.

19                         JUDGE RAINEY: Did that occur?

20                         MS. DAVID: Yes, it did.

21                         JUDGE RAINEY: When did that occur?

22                         MS. DAVID: 4E. I don't know what  
23                         date. I can't tell you. I'm not sure.

24                         JUDGE RAINEY: I believe PPL may

1 have some more definitive information  
2 with regard to that. So go ahead.

3 MS. DAVID: That day Mr. Loch asked  
4 if he could go down there to be sure  
5 they were shut off and they did give  
6 him permission to go down to the pump  
7 station. So he was inside and that's  
8 when he saw there are no clamps, no  
9 springs, no sound isolators and no  
10 insulation pads under those pumps.

11 JUDGE RAINEY: They actually shut  
12 down the pumps on that day?

13 MS. DAVID: They did.

14 JUDGE RAINEY: What was the outcome  
15 in terms of when they shut down the  
16 pump? Did you still experience --

17 MS. DAVID: Yes, I still felt it.  
18 But it's I guess speculation again. If  
19 there are vibrations in the water pipes  
20 when you shut that off, that doesn't go  
21 away right away. I think it's similar  
22 to your stove, electrical coil on a  
23 stove. If you shut it off you still  
24 have heat radiating for a time after

1                   that. So to me it didn't prove  
2                   anything.

3                   JUDGE RAINEY: How long was the  
4                   pump shut down?

5                   MS. DAVID: Just minutes. I think  
6                   15 minutes, maybe. Then I contacted  
7                   another environmental attorney and he  
8                   said to get more testing done, but I  
9                   felt since we did the analyzer and we  
10                  matched vibrations at my house with the  
11                  pump station that we pretty much found  
12                  the source of the problem.

13                 JUDGE RAINEY: When you say you  
14                 pretty much found the source of the  
15                 problem, what is your understanding as  
16                 to what the source is?

17                 MS. DAVID: I understand that when  
18                 we tested with the analyzer we matched  
19                 vibrations at my house and at the pump  
20                 station, not even inside, I think just  
21                 at the pump station door, and the  
22                 frequencies were the same.

23                 JUDGE RAINEY: So you surmise that  
24                 the problems derive from the pumping

1 station?

2 MS. DAVID: I think so.

3 JUDGE RAINEY: And what's occurring  
4 with the pumping station is a result of  
5 electricity supplied to the pumping  
6 station by PPL?

7 THE WITNESS: I think because it's  
8 not insulated whatever electricity and  
9 voltage is needed to run those pumps is  
10 not contained there.

11 JUDGE RAINEY: You're saying the  
12 pumping station should be insulated.  
13 If the pumping station was insulated  
14 you wouldn't be experiencing the  
15 problems?

16 MS. DAVID: I had gone to the  
17 Lehigh County Authority, which owns a  
18 lot of pumps all over our county, and  
19 they told me to sue them for  
20 negligence, because I asked if they  
21 would put pumps in the housing  
22 development 200 feet from the new  
23 houses being built would they put pumps  
24 in without insulation pads and, they

1                   said no.

2                   JUDGE RAINEY: But you think the  
3                   problem at all derives from anything  
4                   that PPL is doing?

5                   MS. DAVID: Well, the stray voltage  
6                   I would think would have been PPL's  
7                   responsibility and I think they should  
8                   have checked the transformer at least  
9                   to find out.

10                  JUDGE RAINEY: So you say the stray  
11                  voltage from the transformer behind  
12                  your house was a problem?

13                  MS. DAVID: It was a problem. That  
14                  was one of the most severe problems.  
15                  To me, I think they almost killed me.

16                  JUDGE RAINEY: Again, that was a  
17                  problem from what time to what time?

18                  MS. DAVID: January of 2004 to  
19                  June.

20                  JUDGE RAINEY: From January 2004 to  
21                  June 2004 you were experiencing  
22                  stray -- what you believe to be stray  
23                  voltage that was coming from the  
24                  transformer behind your home?

1 MS. DAVID: As per the EPA  
2 engineer's report.

3 JUDGE RAINEY: Now, do you believe  
4 this stray voltage was causing the  
5 injury to you as well as the damage to  
6 your home?

7 MS. DAVID: Yes, I do.

8 JUDGE RAINEY: But you haven't  
9 experienced that since, the stray  
10 voltage since June 2004?

11 MS. DAVID: No. But I think there  
12 is an increased magnetic field, which I  
13 can't stand. And apparently some  
14 people aren't bothered by it but other  
15 people are.

16 JUDGE RAINEY: You don't think  
17 there is a continuation of the stray  
18 voltage, but you think there is an  
19 increase in the electromagnetic fields?

20 MS. DAVID: Again, I contacted a  
21 forensic engineer in Easton. He sent  
22 my papers and the findings that I had,  
23 testings that I had done, on to a  
24 professor at Lafayette College in

1 Easton, and that gentleman was going to  
2 put a seismograph in my house and do  
3 testing at night, he said, and suddenly  
4 he sent my things back and said he  
5 couldn't help me. But in conversation  
6 with Mr. Toller from Easton or  
7 Mr. Sealer from Lafayette College, he  
8 said it's possible that electricity  
9 could be coming through the soil. And  
10 I think it is, from the pictures of  
11 these trees.

12 JUDGE RAINEY: He said it's  
13 possible it could be coming through the  
14 soil?

15 MS. DAVID: Yes. It can be  
16 conducted through the soil. Which I  
17 can't explain it, but that's what he  
18 said.

19 JUDGE RAINEY: Did he draw any  
20 connections with PPL with the  
21 electricity coming through the soil?

22 MS. DAVID: No, he didn't.

23 JUDGE RAINEY: Go ahead with your  
24 testimony.

1 MS. DAVID: The structural engineer  
2 that I had first contacted in 2003, I  
3 had called him back in 2004 and he  
4 returned to my home for a second time.  
5 And I was hoping he would verify that  
6 the cracks were worse, because they  
7 were. He said he would call Steve  
8 Henning from the Pitcock Company. I  
9 also found out he used to work for the  
10 Pitcock Company. I waited three months  
11 for his report from the second time he  
12 came and he had indicated that they did  
13 not intend to do anything about the  
14 situation.

15 JUDGE RAINEY: This was the first  
16 structural engineer that you said you  
17 hired in 2003?

18 THE WITNESS: Yes. Paul Reimer.  
19 In his second report he advised  
20 geotechnical studies should be done and  
21 he alluded to the fact that he didn't  
22 think the problems were structural, but  
23 much more than that. Something with  
24 the ground.

1 JUDGE RAINEY: Is there an exhibit  
2 with regard to that?

3 MS. DAVID: Yes. 3L.

4 JUDGE RAINEY: He said there was  
5 something wrong with the ground?

6 MS. DAVID: He said if I got  
7 geotechnical studies done it would  
8 indicate transmissibility from the  
9 vibrations from the pumps to my house.  
10 That report is August 1st, 2004, and  
11 it's the second page at the top.

12 "Geotechnical investigations may also  
13 be warranted to determine soil type."

14 JUDGE RAINEY: This is Exhibit 3L?

15 MS. DAVID: 3M. I'm sorry. August  
16 1st, 2004. It's the second page where  
17 I was reading, Geotechnical  
18 investigations may also be warranted to  
19 determine soil types, et cetera,  
20 between the pump house and your house."

21 JUDGE RAINEY: Were any  
22 geotechnical investigations ever done?

23 MS. DAVID: No. I called  
24 Vibrotech, but they wanted \$5,000. And

1 I thought if I did that and they still  
2 wouldn't fix it or do something, I'm  
3 not a wealthy woman. So I did not do  
4 that. But I did think it was  
5 interesting that he mentioned the soil  
6 types, as well as the professor from  
7 Lafayette College. After that I filed  
8 the complaint, because nobody would do  
9 anything.

10 JUDGE RAINEY: You filed a  
11 complaint with the PUC.

12 MS. DAVID: Yes, I did, Harrisburg.

13 JUDGE RAINEY: Have we pretty much  
14 come up-to-date now?

15 MS. DAVID: Yes. Mr. Loch was at  
16 my house a third time. In fact,  
17 yesterday they tried to put something  
18 on the pipe, water pipe under the  
19 house.

20 JUDGE RAINEY: Who is "they"?

21 MS. DAVID: Trinity Associates.  
22 Two engineers from that company.

23 JUDGE RAINEY: This is with  
24 Mr. Loch's company?

1 MS. DAVID: Yes. Actually, they  
2 did do it.

3 JUDGE RAINEY: What did they do  
4 again? He can the testify to that.  
5 Let him testify.

6 MS. DAVID: Yes. I can't explain  
7 it.

8 JUDGE RAINEY: Is there anything  
9 else that you can testify to with  
10 regard to this matter?

11 MS. DAVID: No.

12 JUDGE RAINEY: I'm going to allow  
13 you to stand down at this time and I'll  
14 ask Counsel if they have questions for  
15 you. And we'll start with Mr. Kanagy.

16 MR. KANAGY: Yes, your Honor, I do.

17 \* \* \*

18 C R O S S

19 E X A M I N A T I O N

20 \* \* \*

21 BY MR. KANAGY:

22 Q. Hi, Miss David.

23 A. Hi.

24 Q. Miss David, in this proceeding

1 you've said that you felt electrical impulses  
2 through your furniture.

3 A. I did.

4 Q. Is your furniture wooden?

5 A. There are some that are, but there  
6 are -- I told you the bed frame was steel and there  
7 is a sleep sofa in the TV room that has a steel  
8 frame. But we felt it sitting in a stuffed chair  
9 in the living room.

10 Q. You felt it through a wooden chair?

11 A. Yes. Whether it was from the  
12 magnetic field or from vibrations, I don't know, or  
13 both, or all of it. But it was -- to me it still  
14 occurs, but it is much less in intensity.

15 Q. The electrical feeling, you say?

16 A. Yes.

17 Q. You mentioned that you felt like  
18 the transformer had stray voltage problems from  
19 January of 2004 to June of 2004?

20 A. I think there were.

21 Q. How do you believe that stray  
22 voltage was gathered?

23 A. I can't tell you. I just know the  
24 EPA engineer was there, he had stated it in his

1 report. I experienced it for six months and after  
2 that it was eased. So somebody did something.

3 Q. Is the EPA report the sole basis  
4 for your believing the stray voltage was coming  
5 from the transformer?

6 A. Yes.

7 Q. If I could refer you to Exhibit 3D,  
8 this is the report from Sal LaDuca?

9 A. Right.

10 Q. Do you agree on Page 1 of the  
11 report Mr. LaDuca indicated that EMF can come from  
12 the wiring inside of a person's house?

13 A. He doesn't actually say that. It  
14 says "This type of wire allows voltage to permeate  
15 beyond the insulation and through wall, floor and  
16 ceiling boundaries." That's what it says on the  
17 first page on 3D. But I also know Romex wiring is  
18 what is used in most homes.

19 Q. So do you believe that EMF can come  
20 from the wiring inside of a house?

21 A. I don't know.

22 Q. And look at Number 2 on  
23 Mr. LaDuca's report here. Do you believe that this  
24 report indicates that EMF can come from appliances,

1 light and appliance fixtures?

2 A. Yes, I do know that. But I can  
3 also tell you I've had the same lights in the same  
4 house for 13 years and there was no problem until  
5 January of 2003. And I do not think any  
6 electricity from my wires in my house would go into  
7 the water pipes of my home.

8 Q. Is your panel box grounded to your  
9 water pipe?

10 A. Yes.

11 JUDGE RAINEY: If you can't answer  
12 the question just say you can't answer  
13 it.

14 THE WITNESS: Okay. Then I don't  
15 know.

16 BY MR. KANAGY:

17 Q. Miss David, you indicated in your  
18 testimony that you made a number of telephone calls  
19 to PPL regarding the problem or the perceived  
20 problem?

21 A. I did.

22 Q. Did you keep a record of those  
23 telephone calls?

24 A. Some of it is -- was written down.

1 I kept like a diary for a time, then I stopped  
2 that. But those dates that I called were on that  
3 diary.

4 Q. Do you have a record of that?

5 A. It was sent to all of you. Yes. I  
6 don't have it with me.

7 Q. You don't have that with you?

8 A. No, I don't.

9 Q. Did that list every call that you  
10 made?

11 A. No.

12 Q. Did you make a lot of phone calls  
13 at that time to different entities?

14 A. Yes, I did.

15 Q. Did you keep track of all those?

16 A. Not all of them. Some of them.

17 Q. Do you know who you called at PPL  
18 to talk to?

19 A. The customer service number.

20 Q. You also indicated, Miss David,  
21 that you were getting a burnt face.

22 A. I was.

23 Q. You believe that that was a  
24 reaction to stray voltage or EMF?

1 A. Yes.

2 Q. Did you have any scientific  
3 evidence to support that?

4 A. I had experiential evidence to  
5 support that. It was happening all the time.

6 Q. So it's your belief that it came  
7 from EMF or stray voltage?

8 A. Yes.

9 Q. Other than the fact that it's your  
10 belief you don't have any other evidence to support  
11 that?

12 A. No.

13 Q. You also indicated that you felt  
14 heat in your floor system in your kitchen. Is your  
15 floor in your kitchen, the subfloor, made out of  
16 wood?

17 A. It is, I think.

18 Q. Now, Miss David, if I could turn  
19 your attention to Exhibit 3J. I'm referring to the  
20 last page. This is the Exhibit regarding the PPL  
21 testing that happened, and I just want to note, the  
22 circles on the last page and where it says dead  
23 trees and dead rosebush, but did you write that in?

24 A. I did, yes.

1 Q. So the PPL person that made this  
2 report --

3 A. No, she did not write that. I did.  
4 I can also tell you the first time she was at my  
5 house in 2004 and did the EMF measurements, in my  
6 TV room she had handed me the device and I put it  
7 on my arm and it measured 4.9. She did not write  
8 that on the paper either, but I did. Then they  
9 came again in June of 2006, she did a lot of  
10 testing all over the house. Again I put it on my  
11 arm and it was 1.9. She did not write that down  
12 either. I did. But she was there when that  
13 happened.

14 Q. You mentioned a Dr. Sealer in your  
15 testimony.

16 A. Yes.

17 Q. Is Dr. Sealer an electrical  
18 engineer?

19 A. I can't answer that. The forensic  
20 engineer in Easton had sent the papers to him, so  
21 he is a consultant, I believe, for this kind of  
22 situation.

23 MR. KANAGY: I have no further  
24 questions for Miss David at this time,

1 your Honor.

2 JUDGE RAINEY: Thank you.

3 Mr. Sherr?

4 MR. SHERR: Your Honor, thank you.  
5 just a few questions.

6 \* \* \*

7 C R O S S

8 E X A M I N A T I O N

9 \* \* \*

10 BY MR. SHERR:

11 Q. You had a DEP investigator come to  
12 your house and I believe that's Exhibit 3E. He  
13 documented the damage that you're complaining about  
14 in that house; is that correct?

15 A. Yes.

16 Q. Then on Page 3 of that report he  
17 concludes that the above described damage was not  
18 characteristic of vibration damage. Did he write  
19 that in his report?

20 A. He did write that.

21 Q. Now --

22 A. I told you --

23 JUDGE RAINEY: I'm sorry. You were  
24 responding to a question?

1 MS. DAVID: I was just going to  
2 continue. When I had the pre trial  
3 testimony date we discussed that and I  
4 mentioned to you at that time that the  
5 blasting inspector said he was only  
6 qualified and legally able to address  
7 blasting. He was not able to state why  
8 he thought the house was cracking or  
9 give any other opinion. But he stated  
10 that the damages were not from  
11 blasting.

12 BY MR. SHERR:

13 Q. What he stated was that the above  
14 described damage was not characteristic of  
15 vibration damage; is that correct?

16 A. I believe it says blasting  
17 vibrations.

18 Q. Let's look at 3E. I'm looking at  
19 the third page, first sentence.

20 A. Mine is 3C.

21 Q. I'm sorry, 3C would be the report  
22 from the DEP investigator. The third page, first  
23 sentence. "The above described damage was not  
24 characteristic of vibration damage.

1           A.     And in the second line it says "Was  
2 not characteristic of blasting damage."

3 BY MR. SHERR:

4           Q.     Miss David, you'll agree with me  
5 that you don't get your water from South Whitehall  
6 Township Authority; isn't that correct?

7           A.     No, I do not.

8           Q.     And there are no connections  
9 between your house and the South Whitehall Township  
10 Authority water pipes; isn't that correct?

11          A.     I believe there are -- I believe  
12 Allentown City connected to South Whitehall's  
13 system at one point.

14          Q.     But you'll agree with me that there  
15 is no direct connection between South Whitehall  
16 Township Authority and your house, right? There is  
17 no pump -- no pipe that goes right from South  
18 Whitehall Township to your house; isn't that  
19 correct?

20          A.     I believe there are water pipes in  
21 front of my house and water pipes that come to my  
22 house that the City of Allentown controls, and they  
23 have connected to the South Whitehall system, so  
24 there may be a connection there.

1 Q. Most importantly, though, you'll  
2 agree with me that there is no pipe that connects  
3 from the pumping station on Hamilton Boulevard that  
4 you're complaining about with a pipe directly to  
5 your house? You'll agree with that, won't you?

6 A. No. Because there is a pipe that  
7 goes down the street and around the corner. And  
8 right there at the corner South Whitehall operates  
9 that --

10 Q. Maybe you didn't understand what  
11 I'm asking. There is a water pipe that connects  
12 into your house, correct?

13 A. Right.

14 Q. That water pipe doesn't connect to  
15 the pumping station on Hamilton Boulevard, does it?

16 A. It connects to the water pipe in  
17 the street, which I believe is connected to the  
18 Whitehall system at the corner.

19 Q. But again, I don't know that you're  
20 answering my question. My question is, there is a  
21 water pipe that connects into your house?

22 A. Yes.

23 Q. That water pipe does not connect to  
24 the pumping station, does it?

1           A.     I only know that it is connected to  
2     the pipes in the street, and South Whitehall's  
3     system is operated at the corner and those pipes  
4     may be connected. I can't answer with certainty,  
5     but I do know that Allentown connected to the  
6     system at one point. It was in the newspaper.

7           Q.     Just to clarify, there were people  
8     out from South Whitehall Township Authority to your  
9     house. Mr. Loch was there and you were there.

10    Mr. Loch --

11           A.     And Mr. Uff.

12           Q.     Mr. Loch went down to the pumping  
13    station, right?

14           A.     Yes.

15           Q.     And you confirmed through Mr. Loch  
16    that they had turned the pumping station off,  
17    correct?

18           A.     Yes, via a computer command.

19           Q.     And you confirmed that that pump  
20    was off; is that correct?

21           A.     They did shut it off, yes.

22           Q.     And even after the pump was shut  
23    off you still felt vibrations in your house; isn't  
24    that correct?

1           A.     That is correct.

2                   MR. SHERR: Thank you. I don't  
3                   have anything further.

4                   JUDGE RAINEY: Let's stand in  
5                   recess.

6                                 \* \* \*

7                                 (Whereupon, a brief recess was taken.)

8                                 \* \* \*

9                   JUDGE RAINEY: Mr. Danks, you had  
10                   some cross-examination for Miss David?

11                   MR. DANKS: Yes, your Honor, very  
12                   brief.

13                                 \* \* \*

14                                 C R O S S

15                                 E X A M I N A T I O N

16                                 \* \* \*

17           BY MR. DANKS:

18                   Q.     Ma'am, you testified you called a  
19                   number of different agencies regarding the  
20                   perceived problems with your house. Did that  
21                   include the City of Allentown?

22                   A.     The water authority. I believe  
23                   Mr. Snyder.

24                   Q.     And what did they do in reference

1 to that?

2 A. First workers came and Mr. Uff had  
3 suggested perhaps there was a leak in the water  
4 pipe that might have been causing the vibration.  
5 So I had -- when I called the water authority they  
6 sent workers to go under the house again to check  
7 the water pipes, and they said there was no leak at  
8 all. And they checked outside too.

9 Q. When was that? Do you have any  
10 idea?

11 A. I don't have the date.

12 Q. At any time did they come and  
13 change the water heater in your house?

14 A. They did. That was the second time  
15 they came to the house. That was after I got a  
16 notice from the City saying if your water meter was  
17 more than 20 years old it had to be replaced, so  
18 they made an appointment to come and replace it.

19 Q. Do you know when that water meter  
20 changeout occurred?

21 A. No.

22 Q. Was it during the time you were  
23 having all these problems?

24 A. Yes.

1 Q. Was there any change in the  
2 vibration problem between the time before they  
3 changed the water meter and after they changed the  
4 water meter?

5 A. No.

6 Q. Was there any change in this  
7 electrical or magnetic problem between the time  
8 before they changed the water meter and after they  
9 changed it?

10 A. At the time when I felt that I was  
11 being shocked, electrocuted or both, I think that  
12 was before they did the water meter. So after they  
13 switched it things were better, but I don't think  
14 that was the reason. I can only say that because I  
15 have another sister who lives maybe 10 blocks from  
16 where I live and they had changed her water meter  
17 as well and she said that she had the vibrations in  
18 her house and felt it was when they changed the  
19 water meters. But I told her that couldn't be,  
20 because it happened to me before that. So it  
21 didn't seem that that was the reason.

22 Q. So you didn't see any connection  
23 between swapping out the water meter --

24 A. No, I don't think so.

1 Q. Between swapping out the water  
2 meter and either the vibration or the electrical  
3 magnetic problems?

4 A. No.

5 MR. DANKS: Nothing further, your  
6 Honor.

7 JUDGE RAINEY: You say after the  
8 water meter was changed there was no  
9 difference with regard to the  
10 vibrations?

11 MS. DAVID: No.

12 JUDGE RAINEY: And there were no  
13 differences with regard to the  
14 electrical impulses.

15 MS. DAVID: See, to me the voltage  
16 was gathered sometime after June of  
17 2004. I don't know how it was gathered  
18 or who gathered it.

19 JUDGE RAINEY: You stopped having  
20 the problems with the electrical  
21 impulses after June of 2004.

22 MS. DAVID: Yes. Although I can  
23 just say I perceived and I thought  
24 three pumps ran at night and only one

1 in the daytime. They say that is not  
2 true, so I can't state that as a fact.  
3 But to me it seems like they run either  
4 more of them or they are more intense  
5 at night, because I still wake up at  
6 2:00, 3:00 in the morning, 5:00 in the  
7 morning, 7:00 in the morning. That's  
8 when it seems to be the worst times and  
9 that's when I still get marks on my  
10 face.

11 JUDGE RAINEY: So the water meter  
12 was changed between January 2004 and  
13 June 2004?

14 MS. DAVID: Yes. But I don't  
15 actually have the exact day with me. I  
16 can go back and look it up. I think it  
17 might have been on that diary that I  
18 have.

19 JUDGE RAINEY: But was it your  
20 testimony that there was no change in  
21 the vibration during the time that the  
22 water meter was changed, or was there a  
23 slight bettering of the situation?

24 MS. DAVID: No.

1 JUDGE RAINEY: No change.

2 MS. DAVID: I just notice in the  
3 daytime everything is calmer and you  
4 don't feel it in the daytime as much as  
5 at nighttime.

6 JUDGE RAINEY: Of course you're  
7 still under oath. When you say you  
8 experience these problems at night as  
9 well. In terms of the burns on your  
10 face is that coming up through the  
11 mattress of your bed?

12 MS. DAVID: It is. I did say there  
13 is a steel frame to the bed, so if that  
14 has something to do with it I don't  
15 know.

16 JUDGE RAINEY: You say also when  
17 you're sitting in a chair you also  
18 experience these burns to your face?

19 MS. DAVID: Yeah.

20 JUDGE RAINEY: Are you leaning up  
21 against the furniture at the time?

22 MS. DAVID: No.

23 JUDGE RAINEY: You're just sitting  
24 upright?

1 MS. DAVID: Yes.

2 JUDGE RAINEY: Your face is not  
3 touching anything?

4 MS. DAVID: No.

5 JUDGE RAINEY: It's coming up  
6 through your body?

7 MS. DAVID: Yes. As I said, when I  
8 put that magnetic field device on my  
9 arm the first time it was 4.9 and both  
10 the engineer and this engineer were  
11 there and I said to them, what's wrong  
12 with me? Because I don't think anybody  
13 is supposed to light up an EMF device  
14 from your human arm. But it did. And  
15 the second time it was less, 1.9, I  
16 thought, oh I'm better. But it's very  
17 scary.

18 JUDGE RAINEY: Did Counsel have any  
19 additional questions based on my  
20 questions?

21 MR. DANKS: No, your Honor.

22 MR. KANAGY: No your Honor.

23 JUDGE RAINEY: Let's address the  
24 exhibits of Miss David which are

1 Complainant Exhibits 1 through 5D. Are  
2 there any objections to the admission  
3 of those documents into evidence?

4 MR. KANAGY: Yes, your Honor. As  
5 noted earlier many of these exhibits  
6 constitute hearsay and we would object  
7 to those on that ground.

8 JUDGE RAINEY: Do you want to point  
9 those out specifically?

10 MR. KANAGY: I can go through them.  
11 The ones that I specifically object to  
12 would be 3H, 3I, 3D, 3E, as well, 5A.  
13 Those are the ones I specifically  
14 object to, your Honor.

15 MR. SHERR: I would join in that.  
16 I don't think he said 3A or 3B, which  
17 we would also object to, as well as 3D.

18 JUDGE RAINEY: I think he did  
19 mention 3D.

20 MR. SHERR: I believe the others he  
21 mentioned. I just want to make sure he  
22 did mention 3H and 3I.

23 JUDGE RAINEY: Yes, he did.

24 MR. SHERR: Thank you.

1 JUDGE RAINEY: Mr. Danks?

2 MR. DANKS: Your Honor, I would  
3 join in that objection. And I don't  
4 believe I went on the record to join  
5 the objection to the hearsay of the  
6 verbal testimony that we have heard.  
7 There is numerous hearsays and we  
8 allowed her to tell her story. But the  
9 City would join and object to that  
10 hearsay and also to the hearsay  
11 exhibits.

12 JUDGE RAINEY: Okay. As I  
13 previously stated, no finding of fact  
14 can be based solely on hearsay  
15 evidence. And with that having been  
16 said I'm going to overrule the  
17 objections. We'll assign whatever  
18 appropriate weight to the documents and  
19 we will admit them into evidence in  
20 this case.

21 Miss David, did you also want to  
22 call Mr. Loch as a witness in this  
23 case?

24 MS. DAVID: Yes.

1 JUDGE RAINEY: Mr. Loch, please  
2 take the witness stand.

3 \* \* \*

4 ALAN LOCH,  
5 after having been first duly sworn, was  
6 examined and testified as follows:

7 \* \* \*

8 E X A M I N A T I O N

9 \* \* \*

10 JUDGE RAINEY: Provide your full  
11 name for the record and spell both  
12 names.

13 THE WITNESS: My name is Alan  
14 A-L-A-N, Loch, L-O-C-H.

15 JUDGE RAINEY: Mr. Loch, by whom  
16 are you employed?

17 THE WITNESS: Trinity Associates,  
18 Incorporated.

19 JUDGE RAINEY: What is your  
20 business title?

21 THE WITNESS: I'm the president of  
22 Trinity Associates, Inc.

23 JUDGE RAINEY: What is your  
24 business address?

1 THE WITNESS: Our business address  
2 is 524 South Chester Road, in  
3 Swarthmore, Pennsylvania, 19081.

4 JUDGE RAINEY: Mr. Loch, what is  
5 your association with this case?

6 THE WITNESS: Miss David called me  
7 to investigate cracks and vibrations in  
8 her house and also a problem she was  
9 having with a burning sensation in her  
10 face. And I was recommended by a  
11 mutual acquaintance of a friend of her  
12 husband who worked for Verizon. They  
13 do a lot of work for -- Trinity  
14 Associates, Inc. had the contract for  
15 all of Pennsylvania to maintain their  
16 electrical power systems in the whole  
17 State of Pennsylvania. So he  
18 recommended that we try and help Miss  
19 David. As I also remember, he said  
20 that a lot of places the water pumping  
21 stations don't have the proper  
22 vibration dampening devices installed.  
23 But I showed up on the scene to help  
24 Miss David in any way I could.

1 JUDGE RAINEY: You're the president  
2 of Trinity Associates.

3 THE WITNESS: Yes, sir. I'm an  
4 electrical engineer. I got a Bachelor  
5 of Science degree in electrical  
6 engineering from the University of  
7 Oklahoma. The Navy sent me to school  
8 under an NROTC scholarship. When I  
9 graduated I was sent to school in the  
10 US Navy for one year to be a nuclear  
11 power engineering officer to watch on a  
12 Navy ship, a submarine. They sent me  
13 to submarine school for another six  
14 months, so I went in the Navy and  
15 served four and a half years as  
16 lieutenant USN. I was electrical  
17 officer in a submarine which supervised  
18 vibration analysis of all the pumping  
19 equipment, all the motors in the  
20 submarine. And I was a sonar officer  
21 for a time also, which detected the  
22 vibration of other ships, other  
23 submarines. This is from 1967,  
24 roughly, to 1972.

1 JUDGE RAINEY: You were here for  
2 the testimony of Miss David; is that  
3 correct?

4 THE WITNESS: Yes, sir, I was.

5 JUDGE RAINEY: What do you have to  
6 add to that testimony?

7 THE WITNESS: I have to add to that  
8 testimony that we did studies, we  
9 documented the evidence in Miss David's  
10 house. Nearly all the doorways have  
11 cracks and the evidence is available,  
12 the pictures are available. You can go  
13 out and look at her house today and see  
14 cracks that long in nearly all her  
15 doorways (indicating).

16 JUDGE RAINEY: We need you to  
17 verbalize about how long that is.

18 THE WITNESS: Yes. Sorry about  
19 that. Cracks I saw last night I was  
20 there, 8 to 15 inches on a good  
21 percentage of her doorways and cracking  
22 across her ceiling where the  
23 flat-headed roofing type screws had  
24 been nailed to keep the drywall up, the

1 drywall is actually -- or the sealant  
2 or whatever they use to fill in the  
3 nail heads is popped out so you can see  
4 the nails at least two places in her  
5 house. To me something has to be  
6 causing this, more than likely  
7 vibration from some source. I spent a  
8 reasonable amount of time. One survey  
9 took us over a period of two weeks  
10 where we documented different aspects  
11 of the house and crawled around in the  
12 basement, walked through the  
13 neighborhood. We were out there not  
14 just three different times, we were out  
15 there six, eight different times  
16 spending up to a whole day there and  
17 sometimes there were two of us there.  
18 So we are very concerned about the  
19 house, because Miss David has told us,  
20 and I believe it, because I'm into real  
21 estate to some degree, that her house  
22 should be worth 235,000 but she might  
23 be selling it for 140,000 in the next  
24 few days. That's one of my major

1 concerns for her health is my major  
2 concern. And we have done this to try  
3 and help her out and to try and solve  
4 the problem, as I'm sure almost  
5 everybody here wants to solve the  
6 problem if we could identify it. The  
7 first time I looked at the problem I  
8 went back and called since Miss David  
9 identified the pumping station, which  
10 is the obvious --

11 JUDGE RAINEY: Why don't we do  
12 this, Mr. Loch, just so we can have  
13 some connection with dates. I know  
14 based on Miss David's testimony you've  
15 been involved with the situation for  
16 quite some time now. Why don't you go  
17 back to the beginning of your  
18 involvement and discuss with us what it  
19 is that you did, what you observed,  
20 what investigations you were involved  
21 in, what analysis you were involved in,  
22 and as much as possible provide the  
23 dates. And also if there are documents  
24 within Miss David's exhibits that might

1 also shed some light on this please  
2 present that as well.

3 MR. SHERR: Your Honor, I apologize  
4 for interrupting. We would ask at this  
5 point at least for an offer of proof  
6 with respect to Mr. Loch. We would  
7 object to him testifying as an expert.  
8 He is not qualified to testify as an  
9 expert in a number of fields which he's  
10 trying to testify, notably structural  
11 engineering, electrical engineering,  
12 vibration analysis, now he's added to  
13 that real estate appraiser. He's not  
14 qualified to testify in any of those.

15 JUDGE RAINEY: You would like to  
16 impeach him at this time.

17 MR. SHERR: Yes.

18 JUDGE RAINEY: We'll allow that at  
19 this particular time. Mr. Sherr, we'll  
20 start with you with specific questions  
21 that you have for Mr. Loch with regard  
22 to his credentials, or expertise, or  
23 his command of this particular subject  
24 matter. Why don't you then ask those

1 questions now.

2 MR. SHERR: Thank you.

3 \* \* \*

4 V O I R D I R E

5 \* \* \*

6 BY MR. SHERR:

7 Q. Mr. Loch, you're not a professional  
8 registered engineer; is that correct?

9 A. That's correct.

10 Q. And you're not licensed as an  
11 engineer anywhere?

12 A. That's correct.

13 Q. Since you've gotten out of the Navy  
14 my understanding is you've had no education  
15 whatsoever in any of the fields in which you  
16 purport to testify here today; is that correct?

17 A. My company, Trinity Associates,  
18 Inc., works for the Boeing Company. We work two  
19 weeks every year for the past 28 years for them.  
20 We work for Lockheed Martin every year. We had the  
21 contract for Verizon. We serviced like 150  
22 stations in the State of Pennsylvania. We had the  
23 contract for the whole State of Maryland where we  
24 serviced their electrical power system. We had the

1 contract, five year contract, for the whole State  
2 of Delaware, we had the contract for the Washington  
3 DC area, the White House, we had the central office  
4 that Verizon had in northern Virginia also. We  
5 worked for Congoleum, for Princeton Medical Center  
6 for about a week every year, we work for Somers  
7 Point Hospital, we've worked for approximately at  
8 least 2,000 companies in our history of 28 years.  
9 Every day I go out and work with competent,  
10 qualified people who are in charge of the  
11 maintenance of these facilities that hire me back  
12 every year and I think that is training in itself  
13 and certifies that they value my judgment.

14 Q. Getting back to my question,  
15 though, you've had no formal education since --  
16 actually since college in any of the engineering  
17 fields in which you purport to be an expert; isn't  
18 that correct?

19 A. I'd say the US Navy nuclear power  
20 program has some of the finest people in it,  
21 including President Jimmy Carter, who graduated  
22 from it, anywhere, and that's a definite  
23 educational program, in my estimate, the Navy, and  
24 their qualification program is equivalent to a

1 college degree -- master's degree, yes, sir.

2 Q. Let's get this straight. We'll go  
3 back. Since you got out of the Navy you've had no  
4 formal education whatsoever in any field; is that  
5 correct?

6 A. I went to some schools run by  
7 manufacturers of equipment that we purchased to do  
8 testing with, yes, sir.

9 Q. Again, to answer my question, you  
10 had no formal education, you didn't get any kind of  
11 advanced degree in any of the fields in which you  
12 purport to testify. Isn't that right?

13 A. That's right.

14 Q. You had a BS degree, Bachelor's of  
15 Science degree, from Oklahoma University; is that  
16 right?

17 A. Yes, sir.

18 Q. Then you went into the Navy and you  
19 were in the Navy for five years; is that right?

20 A. Four and a half.

21 Q. As I understand it what you did  
22 mostly in the Navy is -- why don't you say what it  
23 was. Some kind of infrared scanning that you did?

24 A. No, sir. I was an electrical

1 officer, lieutenant USN.

2 Q. What did you do?

3 A. I was an electrical officer. I had  
4 the electrical division of about 14 electricians on  
5 a nuclear submarine fleet, ballistic missile  
6 submarine. I supervised their performance and  
7 their qualification and as part of that they had  
8 the vibration monitor equipment and they monitored  
9 every pump and motor on the submarine to make sure  
10 it wasn't vibrating too significantly to basically  
11 essentially give away the submarine's location. If  
12 vibration gets into the water in a submarine it can  
13 alert the enemies of the submarine and potentially  
14 destroy it.

15 Q. So people, not you, did vibration  
16 readings on the submarine, right?

17 A. We went to school to learn how to  
18 do the vibration, the theory and so on. I  
19 supervised the people doing that. When I worked  
20 for Westinghouse after I got out of the Navy I  
21 accompanied a vibration monitoring expert, helped  
22 him do studies for people like Scott Paper.

23 Q. That's all well and good what other  
24 people did. I'm trying to figure out what you did.

1 And you didn't do any of these vibration readings  
2 in the Navy, you didn't do them in Westinghouse,  
3 either, did you, for the three years you worked  
4 there after the Navy, right?

5 A. I was a supervisor of the persons  
6 that did that.

7 Q. You'll agree with me you didn't do  
8 it?

9 A. No, I didn't do it.

10 Q. While you were in the Navy for  
11 these number of years, I believe it was four and a  
12 half years you were in the Navy?

13 A. Yes.

14 Q. Did you spend the entire time on  
15 submarines?

16 A. Year and a half going to school,  
17 yes, sir.

18 Q. So a year and a half in submarine  
19 school?

20 A. Nuclear power and submarine school,  
21 yes.

22 Q. And then after the school you went  
23 and worked on a submarine for a number of years?

24 A. Yes.

1 Q. Since you've gotten out of the Navy  
2 my understanding is you've had nothing whatsoever  
3 to do with any kind of vibration expertise; isn't  
4 that correct?

5 A. No. I just told you I went to the  
6 Westinghouse and they had vibration analysis  
7 equipment there and I helped with surveys and we  
8 submitted a quotation. We basically were qualified  
9 to, quote, doing the vibration analysis at a major  
10 plant, I believe it was north Jersey, for a year or  
11 two. It was a quotation. We didn't get the job  
12 but we quoted them.

13 Q. Mr. Loch, you keep saying "we". I  
14 just want to find out about you, what you did.  
15 Let's confine your testimony to you, not anybody  
16 else in Westinghouse or the Navy. Okay? My  
17 understanding is what you did for Westinghouse is  
18 you were an infrared scanning operator; isn't that  
19 correct?

20 A. That's absolutely not true.

21 Q. It's not true? Do you recall when  
22 you testified at your deposition, Mr. Loch?

23 A. I misunderstood. You said the  
24 Navy. I didn't do any infrared scanning in the

1 Navy.

2 Q. It said Westinghouse. That's what  
3 you did. For three years you operated an infrared  
4 scanning --

5 A. No, that's not true. They came up  
6 with infrared scanning at Westinghouse the last  
7 year that I worked for Westinghouse.

8 Q. You operated an infrared scanner,  
9 right?

10 A. The last year that I worked for  
11 Westinghouse, yes.

12 Q. You'll agree with me that you  
13 had -- you personally did nothing whatsoever  
14 regarding anything dealing with vibrations? Would  
15 you agree with that?

16 A. I was the manager in the form of  
17 the electrical officer in a submarine who was  
18 responsible for the vibration monitoring on that  
19 submarine and I basically was associated with other  
20 people that did vibration monitoring at  
21 Westinghouse.

22 Q. You're not a member of any  
23 professional society or organization, are you?

24 A. No.

1 Q. Just so we are clear, you're not a  
2 structural engineer, are you?

3 A. No, sir.

4 Q. And you're not an electrical  
5 engineer, are you?

6 A. No. But I have to say for three  
7 years of my college I did very little electrical.  
8 It's a basic generalized education for engineers.  
9 You just essentially basically concentrate on your  
10 major the last year.

11 Q. With respect to vibrations you have  
12 no experience whatsoever in dealing with the  
13 machinery that you used to test Mrs. David's house;  
14 isn't that correct?

15 A. Like I said, vibration analysis in  
16 the Navy is run silent, run deep, is the duty,  
17 almost the birthright, of every submarine  
18 officer -- the main engine is 15,000 horsepower  
19 were mounted on springs and isolated from the hull  
20 so it didn't put sound into the water. Everything,  
21 the steam pipes, every motor -- I mean this  
22 vibration was the key to the very survival of the  
23 submarine.

24 Q. Would you like to answer my

1 question or did you forget what it is?

2 A. I think I did answer the question.  
3 I answered it that vibration is -- ask any  
4 submarine officer and you'll find out that  
5 vibration is -- the Soviets were so poorly trained  
6 at it that you could detect a submarine 3,000 or  
7 more miles away coming out of port and track them  
8 all over the Atlantic Ocean, knew exactly where  
9 they were, because they didn't concentrate on  
10 vibration analysis. And that was --

11 JUDGE RAINEY: Mr. Sherr, I don't  
12 want to belabor this, because it's  
13 going around and around and we are not  
14 getting any further than where we were  
15 before. Let me do this. Mr. Loch,  
16 what type of service does Trinity  
17 Associates purport to provide to the  
18 customers it contracts with?

19 THE WITNESS: We do engineering  
20 studies on a daily basis. We do  
21 engineering testing on a daily basis.  
22 We use a large variety of testing  
23 equipment. We are in the field of  
24 service, your Honor, where we go to the

1 customer's location and we do field  
2 testing the same as we did at  
3 Westinghouse. And we did a wide  
4 variety of infrared --

5 JUDGE RAINEY: What type of  
6 experience do you have performing the  
7 kind of tests and investigation that  
8 you performed in association with Miss  
9 David's matter?

10 THE WITNESS: I take pictures, I  
11 basically record conditions at Boeing  
12 and Lockheed Martin on a yearly basis,  
13 and basically it's obvious in Miss  
14 David's house all these cracks have to  
15 be coming from someplace.

16 JUDGE RAINEY: Did you actually in  
17 past work perform the kinds of tests,  
18 use the kind of equipment and conduct  
19 the kind of investigation that you  
20 conducted for Miss David?

21 THE WITNESS: We did that in the  
22 Navy, where we conducted on every motor  
23 in the submarine.

24 JUDGE RAINEY: You retired from the

1 Navy on what date?

2 THE WITNESS: About '72.

3 JUDGE RAINEY: Have you done this  
4 kind of work, the work that you did for  
5 Miss David, have you done that since  
6 1972?

7 THE WITNESS: Did it for  
8 Westinghouse Electric. I assisted  
9 doing it. Grant Varga. He and I did  
10 it at Scott Paper.

11 JUDGE RAINEY: You did it as a --

12 THE WITNESS: We were told we did  
13 it the best they had ever seen at Scott  
14 Paper.

15 JUDGE RAINEY: This is while you  
16 were with Trinity Associates.

17 THE WITNESS: After I left  
18 Westinghouse I went to work for Trinity  
19 Associates.

20 JUDGE RAINEY: So you subsequently  
21 say you did work similar to the kind of  
22 investigation and testing that you did  
23 for Miss David and you did that in a  
24 contract with Westinghouse and when was

1                   that?

2                   THE WITNESS: We did current  
3 monitoring for Miss David on her water  
4 pipes, we basically --

5                   JUDGE RAINEY: I'm looking for a  
6 date. When was the work that you did  
7 similar to the work that you did for  
8 Miss David for Westinghouse? When was  
9 that work done?

10                  THE WITNESS: That was a long time  
11 ago, your Honor. It was probably 1975  
12 or thereabouts.

13                  JUDGE RAINEY: You believe it is  
14 the work that you did for the Navy as  
15 well as the work that you did for  
16 Westinghouse, the Navy that you stated  
17 you retired from in 1972, and the work  
18 for Westinghouse you believe you did in  
19 1975, you believe that qualifies you as  
20 an expert to testify here today in  
21 regard to the problems raised by Miss  
22 David?

23                  THE WITNESS: I think, your Honor,  
24 if you look at the report I did of the

1 sound analysis portion, anyway, you'll  
2 see that we got rented a \$10,000  
3 instrument similar to what the Navy  
4 had.

5 JUDGE RAINEY: That's an Exhibit of  
6 Miss David?

7 THE WITNESS: Yes.

8 JUDGE RAINEY: Do you have that in  
9 front of you?

10 THE WITNESS: Yes.

11 JUDGE RAINEY: What exhibit number  
12 is that?

13 THE WITNESS: 31.

14 JUDGE RAINEY: You performed this  
15 analysis by yourself?

16 THE WITNESS: No. Another engineer  
17 graduate at Drexel University. He has  
18 his Bachelor of Science in electrical  
19 engineering, Mr. Charles Ernest helped  
20 me do it.

21 JUDGE RAINEY: E-R-N-E-S-T?

22 THE WITNESS: Yes, sir. What we  
23 did is set up the instrument in our  
24 shop in Chester, Pennsylvania. And we

1 set up a fan and tested the instrument  
2 out to make sure it was working  
3 properly. What we did is measure the  
4 vibration on the fan. You look at  
5 problem one, dated September 15th,  
6 2004, number one, problem number one.

7 JUDGE RAINEY: In the table of  
8 contents?

9 THE WITNESS: No, sir.

10 JUDGE RAINEY: Infrared  
11 preventative maintenance survey?

12 THE WITNESS: That's a form our  
13 secretary used. It wasn't infrared in  
14 this case. It was the closest thing we  
15 had. That's what she used. We took  
16 pictures. If you look at problem  
17 number 2, look at the graph, the  
18 picture in the upper left-hand corner  
19 you'll see two spikes. In the lower  
20 picture you'll see this fan, out of  
21 balance fan, and basically it's spiked  
22 at the left-hand scale, the magnitude  
23 scale, gives you the magnitude of  
24 vibration and the horizontal scale

1 gives you the frequency of the  
2 vibration. So you go from zero to 20K  
3 or whatever cycles per second. As you  
4 can see, there's two spikes as you put  
5 it on the fan.

6 JUDGE RAINEY: Is there additional  
7 Voir Dire in terms of the authority of  
8 this witness to testify? I'll ask  
9 Mr. Kanagy.

10 MR. KANAGY: Yes, your Honor. I  
11 have a few questions.

12 \* \* \*

13 V O I R D I R E  
14 E X A M I N A T I O N

15 \* \* \*

16 BY MR. KANAGY:

17 Q. Mr. Loch, have you ever taken any  
18 classes on EMF testing?

19 A. No, I haven't.

20 Q. And have you ever taken any classes  
21 on stray voltage testing?

22 A. No, I haven't.

23 MR. KANAGY: I have no further  
24 questions, your Honor.

1 JUDGE RAINEY: Mr. Danks?

2 MR. DANKS: Nothing, your Honor.

3 JUDGE RAINEY: I'll allow Mr. Loch  
4 to testify. There are certain  
5 limitations to his level of expertise  
6 and the Counsel will have opportunity  
7 to ask pointed questions in their  
8 cross-examination in regard to  
9 testimony that he gives which Counsel  
10 believes is outside the bounds of his  
11 ability to testify, based on his  
12 experience, education and expertise.  
13 So that having been said, prior to the  
14 voir dire and the impeachment that took  
15 place with regard to Mr. Loch I had  
16 asked Mr. Loch to go back in time to  
17 the beginning of his involvement in  
18 this matter with Miss David and to  
19 provide us with what he has done in  
20 regard to this particular matter.

21 I'll ask you to do that, then,  
22 Mr. Loch.

23 THE WITNESS: Okay. Just to  
24 complete my summary here, we tested

1                   this at the shop. Anybody is willing  
2                   to look at it to make sure the  
3                   vibration monitor was working properly.  
4                   We tested at the fan, next to the fan  
5                   and a distance from the fan and we  
6                   found out that, as expected, the  
7                   vibration was the same frequency except  
8                   less further from the fan. We did the  
9                   same thing at Miss David's house. We  
10                  ran strip recorder charts and basically  
11                  while I was in the basement of Miss  
12                  David's house, this was basically  
13                  September 24th, 2004 at 9:13 a.m. in  
14                  the morning. We were also monitoring  
15                  the current flow in our water pipes  
16                  trying to identify the magnetic field  
17                  situation which is different, but as I  
18                  rested my hand on her water pipe my  
19                  ring started vibrating, clank, clank,  
20                  clank, and made sure the monitor was  
21                  going and took a picture of it with a  
22                  digital camera on Page 31, problem  
23                  number 31, and you'll see how it was a  
24                  significant peak at a certain -- at two

1 different frequencies. I took the  
2 monitor, the \$10,000 instrument, and it  
3 gives you the catalogue number and the  
4 model number earlier in the report.

5 JUDGE RAINEY: That is the water  
6 pipe in the basement at the water  
7 meter?

8 THE WITNESS: Yes. In Miss David's  
9 house. That's right. And I went to  
10 the door of the pumping station while  
11 the pump was running. It doesn't say  
12 it here but I took several readings  
13 outside at different locations, but  
14 when I got to the meter, or the pumping  
15 station, essentially similar vibrations  
16 were showing the same peaks as -- same  
17 frequency that was showing up at Miss  
18 David's home. And as I was there  
19 taking the readings at 9:36, from 9:13  
20 to 9:36 a.m. on September 24th, 2004,  
21 they shut off the pumps and I took a  
22 reading. Again there was no -- the  
23 peaks went away and I went back to the  
24 house and the peaks went away there,

1                   too. And they were similar at both  
2                   locations, so same frequency at both  
3                   locations.

4                   JUDGE RAINEY: When you say the  
5                   peaks went away, was there a  
6                   diminishment in the vibrations or did  
7                   the vibration cease?

8                   THE WITNESS: Essentially the  
9                   vibration ceased. I could hear the  
10                  pump from the door. I didn't get in to  
11                  see it.

12                  JUDGE RAINEY: So the vibrations in  
13                  Miss David's house ceased when they  
14                  shut down the pumping station?

15                  THE WITNESS: Yes, sir.

16                  JUDGE RAINEY: And this was on  
17                  September 24th, 2004?

18                  THE WITNESS: Yes, sir. To me, as  
19                  you see there, it goes from zero hertz  
20                  cycles per second to 100K hertz. There  
21                  is an infinite number of variations.

22                  JUDGE RAINEY: What problem  
23                  numbers?

24                  THE WITNESS: Problem Number 31.

1 JUDGE RAINEY: As compared to?

2 THE WITNESS: Problem Number 32 and  
3 33. And I guess I'm trying to say, I  
4 did it at the fire hydrant, at the  
5 manhole. When I got back to the  
6 problem 35, well to the pumping station  
7 were not running, you can see it went  
8 away and it went away at the house  
9 also. It's like a fingerprint, your  
10 Honor. In submarines the sonar rays --  
11 while I was sonar officer we had a  
12 complete catalogue of every Soviet  
13 submarine that was done as it came out  
14 of port. They had a strip chart much  
15 more complex than this, because it was  
16 hardwired to the submarine, but on the  
17 other hand it reported the same peaks  
18 and valleys for that given submarine.  
19 And you could identify the exact Soviet  
20 submarine. Not just the class, but the  
21 exact submarine that you were tracking  
22 on your sonar. By having these strip  
23 charts, because the peaks occur on a  
24 given submarine at different

1 frequencies, and so it is a very valid,  
2 precise science sound analysis. And  
3 this is back in 19 -- in the '70's. So  
4 the same technology exists today except  
5 it's more refined. And when the pump  
6 vibrates and it's vibrating  
7 Mrs. David's home and my ring is  
8 bouncing and I go back after they shut  
9 it off and it's not there anymore, to  
10 me it's almost a certainty that the  
11 vibrations is actually entering Miss  
12 David's home from the pumping station.  
13 And I was there earlier and almost all  
14 our customers that we deal with, that I  
15 deal with, that I've personally  
16 witnessed, have pipes that size that  
17 have rubber inserts. The rubber is  
18 part of the pipe and that rubber  
19 basically as the motor rotates and  
20 vibrates steel will convey that  
21 vibration into the -- down the pipe and  
22 the pipe will vibrate. But if you put  
23 rubber inserts of pipe the rubber will  
24 dampen it out and it will not reach the

1 rest of the pipe. They follow this up  
2 by not only putting rubber sections in  
3 the pipe, but they put springs under  
4 the motor mounting pipe and they put  
5 isomer pads, which are made out of  
6 rubber and cork, and they dampen the  
7 vibration that gets into the ground  
8 where the pad that the pumps sit on,  
9 the motor sits on, and that keeps the  
10 vibration from bothering the rest of  
11 the community.

12 We have pictures here and they let  
13 me into the pumping station during my  
14 first visit to Linda's house, in  
15 February of 2004, I think, and I took  
16 pictures. They didn't put these rubber  
17 sections in the pipe, so the vibration  
18 is vibrating throughout that pipe and  
19 the only rubber gromets they put in was  
20 to keep the vibration from getting into  
21 the concrete floor. They put a rubber  
22 grommet, rubber boundary, they wrapped  
23 the pipe in rubber so that as the pipe  
24 vibrates it wouldn't vibrate against

1 the concrete floor and perhaps split  
2 their own floor. In fact, that makes  
3 it worse. The pipe would vibrate and  
4 vibrate downstream or on the section  
5 side or whatever to essentially affect  
6 the customers, the people like Miss  
7 David, on the streets around where the  
8 pipe ran. And to me the pump is  
9 running and it's vibrating at certain  
10 specific frequencies and that  
11 identifies that pump and the vibration  
12 monitor identifies frequencies and they  
13 match up in the house and they match up  
14 in the pumping station and it shuts off  
15 and it goes away -- it's hard to argue  
16 that that pump wasn't the source of  
17 vibrations.

18 JUDGE RAINEY: Let me ask you this,  
19 Mr. Loch. You said you read the same  
20 vibration frequencies at the pumping  
21 station that you read at Miss David's  
22 house; is that correct?

23 THE WITNESS: Yes, sir.

24 JUDGE RAINEY: How were the

1 vibrations from the pumping station  
2 getting to Miss David's house? How was  
3 it traveling?

4 THE WITNESS: We probably have --  
5 if I can show this Exhibit I think it  
6 would be worthwhile for you in  
7 particular to see how the actual plan  
8 looks (indicating).

9 MR. SHERR: I'm going to object to  
10 the use of that Exhibit. We have not  
11 been provided with that, we have never  
12 seen that before. I don't know what  
13 that is, that handwritten drawn  
14 diagram.

15 JUDGE RAINEY: Is that related to  
16 any document that is in evidence right  
17 now or any document that Miss David has  
18 provided as one of her Exhibits,  
19 Mr. Loch?

20 THE WITNESS: It's related to all  
21 of them. It shows where the pumping  
22 station is, where Miss David's house  
23 is, it shows the distance from Miss  
24 David's house to the pumping station.

1 JUDGE RAINEY: We are going to  
2 allow testimony with regard to that and  
3 you'll have a chance to cross examine  
4 Mr. Loch in regard to this diagram. Go  
5 ahead, Mr. Loch.

6 THE WITNESS: This is the pumping  
7 station, your Honor, and Miss David  
8 asked if she could question the  
9 Defendants, your Honor, and perhaps  
10 they didn't understand the question or  
11 they said, no, you can't question us.  
12 Well, she can't question the lawyers of  
13 the Defendants, but on the other hand  
14 I'm saying if --

15 JUDGE RAINEY: When did she ask the  
16 question?

17 THE WITNESS: During the deposition  
18 she said "Can I question you" and they  
19 said, "You can't question us."

20 JUDGE RAINEY: You're going to  
21 provide us with some testimony with  
22 regard to this diagram. Go right  
23 ahead.

24 THE WITNESS: This is incomplete

1                   because we don't have the piping plans  
2                   and whatever that are underground here.  
3                   But it shows the pumping station.  
4                   These are large pipes, like 6, 8-inch  
5                   pipes, your Honor, and basically these  
6                   are significant pumps and basically  
7                   they're capable of must be a reasonable  
8                   amount of water. There is -- South  
9                   Whitehall Township has, and it's  
10                  labeled on there, South Whitehall, a  
11                  vault, and I work for Washington  
12                  Suburban Sanitary Commission 15 years,  
13                  three months every year for 15 years  
14                  straight, and I surveyed up to 20 of  
15                  these vaults a day for Washington  
16                  Suburban. It's a big manhole and if  
17                  you go down inside a straight up and  
18                  down ladder there is a huge pipe in  
19                  there, perhaps two or three, perhaps --  
20                  City of Allentown's here, they have an  
21                  engineer here, they might be able to  
22                  tell me the exact size, but some of the  
23                  pipes when I worked for Washington  
24                  Suburban were as tall as this room, 6

1 foot wide and high. And those pipes  
2 carry the water for the Capitol, the  
3 Maryland side of Washington DC.

4 MR. SHERR: I'm going to object to  
5 all of this testimony. There is no  
6 basis in fact whatsoever for any  
7 testimony given based on this diagram.  
8 He is testifying about things that are  
9 completely irrelevant, having to do  
10 with something in Washington DC and  
11 there is no connection to this case  
12 whatsoever. And I move to strike all  
13 that testimony.

14 JUDGE RAINEY: Your objection's  
15 noted and I'm going to ask Mr. Loch to  
16 stick to the particulars of this case  
17 and what you know about this particular  
18 matter.

19 THE WITNESS: Yes, sir. There is  
20 evidently a large pipe buried in the  
21 street on Hamilton Boulevard. There is  
22 a water pumping station that's probably  
23 connected to that pipe. There is a  
24 pipe that runs in front of Linda's

1 house, where the vibration was picked  
2 up, that seems to be coming from the  
3 water pumping station 200 or so feet  
4 away. This is the church, church  
5 parking lot, this is the high tension  
6 lines going around the church parking  
7 lot. I'll get to that later. But they  
8 pick up vibrations in submarines 3,000  
9 miles away in water. This is a pipe  
10 that's continuous steel. It wouldn't  
11 be abnormal to feel that in her house,  
12 and basically since the pad isn't  
13 isolated either from the ground, if the  
14 pumps are sitting on a rock here it  
15 could vibrate Linda's house also  
16 somehow --

17 JUDGE RAINEY: Are you saying there  
18 is a pipe connection from the pumping  
19 station to Miss David's house?

20 THE WITNESS: I believe there is a  
21 continuous run of pipe. I don't know  
22 the route it takes, but I believe there  
23 is a continuous run of pipe from that  
24 pumping station in front of

1 Mrs. David's house, yes.

2 JUDGE RAINEY: Is there anything  
3 else you want to add to your testimony?

4 THE WITNESS: Miss David's been  
5 bothered with electromagnetic fields  
6 and essentially from my experience in  
7 the field it's very unusual for high  
8 tension lines to run in a U shape  
9 fashion like this. Usually high  
10 tension lines go in a straight line.  
11 They might take an L turn or whatever,  
12 but for whatever reason PPL ran this  
13 around the parking lot. And when they  
14 did that, if you're familiar with  
15 electrical theory at all, there has to  
16 be somebody here, I assume there is, if  
17 you put current in a coil, a magnetic  
18 field in a circle, an electrical field  
19 is basically produced in the middle of  
20 that coil. Now, if there's any  
21 unbalance in the load there could be a  
22 current in the neutral. Or the  
23 utilities don't have a neutral. They  
24 use the ground. And so if there's

1 capacitors, and perhaps this young lady  
2 knows if there's capacitors in the  
3 immediate vicinity, if one group of the  
4 three sets of capacitors blows a fuse  
5 then there is a large amount of ground  
6 current flowing perhaps in that water  
7 line and if the capacitor bank is over  
8 here --

9 MR. KANAGY: Your Honor, this is  
10 pure speculation on Mr. Loch's part. I  
11 move to strike this testimony. It's  
12 nothing but pure speculation.

13 JUDGE RAINEY: So noted,  
14 Mr. Kanagy, and we'll of course take  
15 that into consideration with regard to  
16 this matter.

17 Mr. Loch, to the extent that we can  
18 move beyond speculation and talk about  
19 matters that you know, let's do that.

20 THE WITNESS: Yes, sir. Miss David  
21 has -- she'd be glad to testify  
22 directly to you -- has on occasion  
23 called PPL and told them the  
24 electromagnetic fields or whatever is

1                   bothering her is very intense. And  
2                   she's told me the electromagnetic  
3                   fields have alleviated very quickly  
4                   after she's placed such calls. I'm  
5                   saying that we should be able to ask  
6                   PPL engineers detailed questions as to  
7                   whether there is a capacitor bank that  
8                   would generate this, that if they took  
9                   it off line the magnetic fields would  
10                  go away instantly.

11                 JUDGE RAINEY: You'll have some  
12                 opportunity to cross examine PPL's  
13                 witness, but I want to know in terms of  
14                 your involvement in this case, what  
15                 were you specifically able to find and  
16                 what were your conclusions?

17                 THE WITNESS: When we did the  
18                 inspection of Miss David's home we did  
19                 find current going through the water  
20                 pipe. We tried to isolate the water  
21                 pipe from the house system.  
22                 Unfortunately, but perhaps it explains  
23                 some of Miss David's problem, the soil  
24                 under her house is very high

1 resistance. So we couldn't, even  
2 though we pounded in five or six rods  
3 of varying lengths, we couldn't get  
4 less than the national electrical code  
5 requirement of 25 ohms and we had to  
6 leave the water pipe hooked up as a  
7 main ground. That is hooked to her  
8 neutral in her panel. As recently as  
9 last night we were picking up two to  
10 three amps in her water pipe. That's  
11 not that abnormal. We tried to insert  
12 impedance in the line. That didn't  
13 work.

14 JUDGE RAINEY: This was all done  
15 last night?

16 THE WITNESS: Last night. And we  
17 tried to put the electrical -- the  
18 ground rods in earlier and we couldn't  
19 do that.

20 JUDGE RAINEY: When you say  
21 earlier, when was that?

22 THE WITNESS: 2004. September  
23 2004.

24 JUDGE RAINEY: What is your --

1 based on your findings what connection  
2 does PPL have to Miss David's problems?

3 THE WITNESS: PP & L's designed  
4 this loop which included the water pipe  
5 could be -- if they had an unbalanced  
6 load or --

7 JUDGE RAINEY: Again, you're saying  
8 "could be." You're saying you don't  
9 know for sure.

10 THE WITNESS: I don't know for  
11 sure. Perhaps I could identify more if  
12 PP & L's engineer would answer the  
13 questions I have for them, or for her.  
14 I am not sure. I haven't been able to  
15 identify anything that PP & L is doing  
16 concretely, but as is often the case,  
17 people don't answer questions that you  
18 have for them if there is a liability  
19 involved. So I have suspicions that  
20 they might know more than they have  
21 told Miss David.

22 JUDGE RAINEY: Miss David, were  
23 there any questions you have for your  
24 witness, Mr. Loch, which he has not

1 addressed?

2 MS. DAVID: No questions for him.

3 JUDGE RAINEY: Was there anything  
4 further you want to add to your  
5 testimony, Mr. Loch?

6 THE WITNESS: I just wanted to make  
7 a note, your Honor, that the water  
8 meters that the City of Allentown  
9 attorney mentioned, they're able to be  
10 read remotely, so those water meters in  
11 all the houses that have been put in  
12 recently, instead of going and reading  
13 the meters in the basements they  
14 transmit electromagnetic radiation.

15 MR. DANKS: Your Honor, I'm going  
16 to object. I don't know what the  
17 factual basis for this testimony is.  
18 There is nothing in the record about  
19 any of this.

20 JUDGE RAINEY: I'm not sure what  
21 relevant point Mr. Loch is making.  
22 What are you trying to show?

23 THE WITNESS: I guess what I'm  
24 trying to say is if you drive by and

1 can get the reading from the house's  
2 water meter it has to be radiating some  
3 kind of electromagnetic radiation and  
4 that could be affecting --

5 JUDGE RAINEY: What you're saying  
6 is that the City of Allentown in their  
7 automatic meter reading may be  
8 contributing to the electromagnetic  
9 fields.

10 THE WITNESS: There's all kinds of  
11 different meters. I'm not an expert in  
12 those meters but I'm saying it's a  
13 possibility.

14 JUDGE RAINEY: You're speculating  
15 again. Okay. Your point is noted.

16 MR. DANKS: I'd move to strike all  
17 this speculation and remove meter  
18 reading.

19 JUDGE RAINEY: We will have  
20 cross-examination at this point. And I  
21 am considering very carefully what is  
22 being said, what speculation is being  
23 made, and what hard evidence is being  
24 presented in regard to any testimony

1                   that's been given here today, any  
2                   documents that are being presented here  
3                   today. Let's move to  
4                   cross-examination.

5                   Let's start with you, Mr. Kanagy.

6   \* \* \*

7   C R O S S

8   E X A M I N A T I O N

9   \* \* \*

10           BY MR. KANAGY:

11                   Q.     Hi, Mr. Loch.

12                   A.     Yes sir.

13                   Q.     Just to clarify, is it correct you  
14           have not reached any conclusion about where the  
15           electricity in Miss David's water pipe is coming  
16           from?

17                   A.     I was only able to conclude after  
18           putting impedance in that it's not a parallel path.  
19           No, I haven't concluded where it's coming from.

20                   Q.     Is it your belief that PPL's  
21           service to -- electric service to Miss David is  
22           faulty?

23                   A.     I don't believe there is anything  
24           wrong with the individual transformers or the high

1 lines. There might be something wrong with the  
2 configurations.

3 Q. But you haven't reached any  
4 conclusion?

5 A. I haven't reached any conclusions.

6 Q. You don't believe that PPL electric  
7 service, who put a transformer into Miss David's  
8 house, is faulty?

9 A. No, I don't.

10 Q. When you were in Miss David's house  
11 did you ever feel the vibrations?

12 A. No, I didn't. Well, I did -- I  
13 felt the vibrations when my ring -- yes, sir.

14 Q. Just to clarify, that was when you  
15 were under the house; is that correct?

16 A. Yes, sir.

17 Q. And the ring was clanging against  
18 the pipe.

19 A. (Witness indicating).

20 Q. When you were standing -- maybe you  
21 should respond for the court reporter so she can  
22 understand.

23 A. Sorry. Okay. That's the only time  
24 I actually felt the vibration, was when the ring

1     banged against the water pipe as it vibrated  
2     significantly.

3             Q.     So for all the times that you were  
4     in Miss David's house you could not feel the  
5     vibrations in her kitchen or in her living room or  
6     in any other room in any part of her house?

7             A.     That's correct.

8             Q.     Is it correct that you also  
9     couldn't feel the magnetic fields?

10            A.     That's correct.

11                    JUDGE RAINEY:  When was it, did you  
12                    say, that you had your ring vibrating  
13                    against the water pipe?

14                    THE WITNESS:  September 24th, about  
15                    9:13 a.m.

16                    JUDGE RAINEY:  And that was in  
17                    2004.

18                    THE WITNESS:  Yes, sir.

19     BY MR. KANAGY:

20             Q.     Mr. Loch, is it abnormal for  
21     current to be on a water pipe?

22             A.     No.

23             Q.     Is it correct that the ground in  
24     Miss David's panel box is grounded to her water

1 pipe, it's connected to her water pipe?

2 A. Yes, it is.

3 Q. Is it correct that she could choose  
4 to ground her panel box at another place?

5 A. That's correct.

6 Q. Would you please -- what was your  
7 solution? At the deposition you indicated you had  
8 a solution for fixing the purported electrical  
9 problems in Miss David's house. Could you explain  
10 what those are?

11 A. At the deposition we thought that  
12 perhaps Miss David's house panel, we determined  
13 last night, it had some unbalanced load. Even  
14 though none of the major appliances were running,  
15 like the air conditioning or hot water heater,  
16 which are all 240 volts, just the lights and  
17 everything was unbalanced. So we switched a couple  
18 wires and balanced the load. In other words, a  
19 neutral wasn't carrying any current anymore, or one  
20 amp was six or eight amps earlier. It's just good  
21 electrical practice to try and balance the load in  
22 each phase, each 120 volt leg.

23 JUDGE RAINEY: That was in her  
24 electrical switch box?

1                   THE WITNESS: That's right.  
2                   Everything is completely wired, it's  
3                   according to the national electric  
4                   code, and it is put to her water pipe  
5                   probably because it's hard to ground.  
6                   As I found out it's hard to drive a  
7                   ground rod independently of the water  
8                   pipe. We tried to, in our shop  
9                   earlier, we have large test equipment.  
10                  Our equipment tests up to a 5,000 amp  
11                  circuit breaker. We have six high  
12                  current test sets. We put one of them  
13                  with two legs on it and put an  
14                  impedance doughnut CT in it to lessen  
15                  the current through the one leg and we  
16                  were very successful in our shop. We  
17                  got it down to 3 percent by putting  
18                  this CT in the water pipe. But it was  
19                  only because it had a parallel path.  
20                  So we had like 300 amps, the two legs  
21                  had 150, 150. When we slipped the CT  
22                  over the one leg it went down to almost  
23                  300 amps in the leg that didn't have  
24                  the CT. So we slipped the CT over on

1 her water pipe last night -- not on her  
2 water pipe, but on her ground line, the  
3 ground bond that went from the water  
4 pipe to the panel, and it didn't alter  
5 the current at all. It was still two,  
6 three amps, so it must not be a  
7 parallel -- whatever the source of the  
8 current is outside Miss David's home  
9 apparently isn't a parallel path.  
10 Maybe it's a bad connection in one of  
11 the other neighbors' houses, I don't  
12 know. All I know is what happened to  
13 Miss David's house. I am concerned  
14 with Miss David. I'd like to see her  
15 healthy and not bothered by this and I  
16 was trying things that might work in  
17 accordance with my experience and  
18 expertise. But it didn't work at all,  
19 so I probably will go back tomorrow and  
20 try and get a ground rod in her yard.  
21 Probably means punching a hole in her  
22 wall and try to get free of the water  
23 pipe, which might be the reason she's  
24 getting these burns to her face. I'm

1 not sure.

2 BY MR. KANAGY:

3 Q. So it's possible that additional  
4 grounding at her house could fix the problem, the  
5 electrical problem, in the water pipe?

6 A. If we can remove the water pipe  
7 ground, which from my own experience with a hammer  
8 drill in her basement, is easier said than done.

9 MR. KANAGY: I have no further  
10 questions, your Honor.

11 JUDGE RAINEY: Thank you.

12 Mr. Sherr?

13 \* \* \*

14 C R O S S

15 E X A M I N A T I O N

16 \* \* \*

17 BY MR. SHERR:

18 Q. Mr. Loch, just looking at Mrs.  
19 David's exhibit 3I why is it that you haven't  
20 provided us with actual paper readings of the  
21 vibrations that you purportedly took testing of?

22 A. The pictures are there, the strip  
23 start chart pictures are there.

24 Q. You do have pictures, but I'm

1 trying to find out why you didn't provide us with  
2 paper so we could actually see it.

3 A. You can see it. It's right there.

4 Q. You have no reason why you didn't  
5 provide us with the paper readings?

6 A. You're asking me essentially why I  
7 didn't provide you with the original when you  
8 already have the copy. I assumed this would be  
9 good enough. It's good enough for me to read.  
10 It's not --

11 Q. I guess that's my point. It isn't  
12 that easy to read when you take a picture of it as  
13 opposed to make a copy of it, and I'm trying to  
14 figure out why you didn't provide us with a paper  
15 copy of it so we could see what your purported  
16 readings are. Do you have a reason for that?

17 A. I've never been asked for that  
18 before. It was unintentional. I'm sorry that you  
19 don't consider it good enough. It's just to me  
20 it's the same exact thing. It's a copy of the  
21 strip.

22 Q. Where in 3A do you have the actual  
23 readings from when you took readings of  
24 Mrs. David's house when the pump was not on?

1 JUDGE RAINEY: 3A or 3I?

2 MR. SHERR: 3I, your Honor.

3 THE WITNESS: Well, I assume you  
4 mean my report of September 24th. I  
5 might not have taken a -- I might have,  
6 I might not have. I obviously took --  
7 I remember taking it, but obviously it  
8 was gone, not only at the pumping  
9 station but at the house too. I might  
10 not have recorded, ran or kept the  
11 strip chart. We have a whole bunch of  
12 rough data at our shop.

13 BY MR. SHERR:

14 Q. You haven't provided this Court or  
15 us with any kind of readings when the pump was  
16 purportedly off, have you, with respect to  
17 vibrations?

18 A. I basically -- it might not be in  
19 this report. The pictures are there. I might have  
20 it at the shop in our archives of all the reports.

21 Q. Mr. Loch, you understand that you  
22 were supposed to provide for Mrs. David so that she  
23 could help in her case this information. You  
24 understand that, right?

1 A. Yes, sir.

2 Q. But you didn't provide it, did you?

3 A. I'm a witness. I'm telling you

4 that I --

5 JUDGE RAINEY: Let me shortcut  
6 this. I don't want to spend an  
7 unnecessary amount of time with these  
8 kind of questions. So Mr. Sherr, to  
9 the extent that you didn't ask for the  
10 information in discovery I don't want  
11 to go through a whole line of questions  
12 of what you think he should have  
13 provided but didn't provide and you  
14 didn't ask for.

15 MR. SHERR: If I may, I did ask for  
16 it in discovery. I asked for a request  
17 for production of documents.

18 JUDGE RAINEY: There were no  
19 motions to compel.

20 MR. SHERR: There were no motions  
21 to compel and I asked him during his  
22 deposition as well and he doesn't have  
23 those to produce.

24 JUDGE RAINEY: All right. Again,

1                   be very mindful of economizing this  
2                   hearing process to the extent that  
3                   these are questions you also asked  
4                   during the course of your deposition  
5                   and it may not be necessary to go  
6                   through a whole litany of questions  
7                   regarding what was not provided and  
8                   things where motions to compel were not  
9                   filed. Keep that in mind. Go right  
10                  ahead.

11                 MR. SHERR: If I may, though, he  
12                 has testified to things and there is no  
13                 basis for that testimony, and that's  
14                 just what I was pointing out.

15                 THE WITNESS: I made this testimony  
16                 under oath and I basically -- my word  
17                 says that it went away. What more  
18                 evidence do you want? I could get  
19                 that, but I've already made the  
20                 statement.

21                 MR. SHERR: I'll move on, your  
22                 Honor.

23                 BY MR. SHERR:

24                 Q.        You were present when South

1 Whitehall Township Authority agreed to do an  
2 experiment and turn off the pumps to see what  
3 effect that had on Mrs. David's house, correct?

4 A. I was present.

5 Q. In fact, you went to the pumping  
6 station and you confirmed via walkie talkie that  
7 the pump was off, right?

8 A. I went to the pumping station and  
9 noted there were no vibration boots and whatever  
10 installed, and I told them the pump was off, yes.

11 Q. So you confirmed that the pump was  
12 off; is that correct?

13 A. I did.

14 Q. After the pump was turned off  
15 you'll agree with me that Mrs. David still felt  
16 vibrations in her house, didn't she?

17 A. We were forced to rent a \$10,000  
18 instrument, which in my mind South Whitehall  
19 Township should have rented --

20 MR. SHERR: Your Honor, can you ask  
21 him to answer the question.

22 JUDGE RAINEY: Mr. Loch, answer the  
23 question yes or no and then you can  
24 explain it.

1 BY MR. SHERR:

2 Q. Would you like me to repeat the  
3 question?

4 A. Yes, sir.

5 Q. After the pumps were turned off and  
6 you confirmed that the pumps were turned off  
7 Mrs. David still reported feeling vibrations in her  
8 house, correct?

9 A. I don't specifically recall.

10 Q. Did you ever ask her whether she  
11 still felt vibrations?

12 A. I might have, I might not have.

13 Q. You heard her testify today that  
14 she --

15 A. She's not a \$10,000 instrument.

16 Q. You heard her testify today that  
17 she still felt the vibrations after the pumps were  
18 turned off, right?

19 A. She felt something.

20 Q. You heard her testify that she felt  
21 those same vibrations when the pump was off, didn't  
22 you? You heard her testify to that today or you  
23 don't remember?

24 A. I'm saying that she felt something.

1 Whether it was the vibrations or not I'm not apt to  
2 say and knowing how human beings work I don't think  
3 she can say it's vibration of a certain frequency.  
4 She's not a \$10,000 instrument able to identify all  
5 that.

6 Q. Just to be clear, just so we are  
7 not mixing these things up, when South Whitehall  
8 Township Authority personnel came to Mrs. David's  
9 house and they went and turned off the pumping  
10 station, the pumps, and Mrs. David still felt those  
11 vibrations, you weren't taking any readings at that  
12 time, were you?

13 A. I didn't have anything to take  
14 readings with.

15 Q. That's right. All we know with  
16 respect to when the pumps were turned off at that  
17 time was Mrs. David felt the same vibration, right?

18 A. She felt what she felt. I couldn't  
19 say one way or the other. I never felt it at that  
20 time.

21 Q. You testified that the vibration  
22 that you measured into Mrs. David's house, you  
23 tested that vibration at the area where the water  
24 pump -- where a water pipe connected to her house,

1 correct?

2 A. The one and only water pipe.

3 Q. There's a water pipe that connects  
4 to her house and that's where you did your readings  
5 from, right?

6 A. Yes, sir.

7 Q. There is no connection whatsoever  
8 between that water pipe into Mrs. David's house --  
9 excuse me, the water pipe into Mrs. David's house  
10 and the pumping station, is there?

11 A. Please feel free to show me the  
12 diagram of the pipes. I'll be glad to look at it  
13 and answer that question. But I have no idea.

14 Q. So you don't know one way or the  
15 other?

16 A. I don't know.

17 MR. SHERR: I have nothing further,  
18 your Honor.

19 JUDGE RAINEY: Mr. Danks?

20 MR. DANKS: Just briefly, your  
21 Honor.

22 \* \* \*

23 C R O S S

24 E X A M I N A T I O N

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BY MR. DANKS:

Q. Just a follow-up on a question by the Judge. He asked you what was PPL's connection to the problems at the house, and my question is, what the is the City of Allentown's connection to vibration problems at the house?

A. Miss David lives on the borderline of South Whitehall Township, from what I understand, and Allentown. Allentown's water pipe runs into Miss David's house. South Whitehall is connected with that pumping station probably one way or another. All I can say is, as I said in the deposition, that the City of Allentown to protect their customers like Miss David before they connect up to a pumping station, which is very close to their customers, should insist on better vibration isolation in future pumping stations, including the retrofit of this pumping station with vibration isolators, rubber pipe sections, coiled springs. I took pictures and submitted them in an earlier report.

MR. DANKS: Move to strike.

Nonresponsive.

1 JUDGE RAINEY: Your question was  
2 what is the connection of the City of  
3 Allentown to the problem, and it's my  
4 understanding, Mr. Loch, that you  
5 testified in essence that there is some  
6 connection between the pipes from the  
7 pumping station and the pipe from  
8 Allentown that goes into Miss David's  
9 house; is that correct?

10 THE WITNESS: That's right.

11 JUDGE RAINEY: I'll overrule the  
12 objection. Go ahead, Mr. Danks.

13 BY MR. DANKS:

14 Q. Just a follow-up. Same basic  
15 question. What's the City of Allentown's  
16 connection to the electromagnetic problems that are  
17 taking place at the house?

18 A. To my knowledge none.

19 Q. In any of your testing or  
20 examinations at the property did you ever notice  
21 any problem with the water flow or pressure or  
22 quality or any of those characteristics of the  
23 water service to the house?

24 A. No, sir.

1 MR. DANKS: Nothing further, your  
2 Honor.

3 JUDGE RAINEY: We'll allow you to  
4 stand down, Mr. Loch. I believe, Miss  
5 David, you also listed your sister,  
6 Dolores Miller, as a witness in this  
7 case?

8 MS. DAVID: Yes.

9 JUDGE RAINEY: We'll ask your  
10 sister to take the witness stand.

11 MS. DAVID: Can I submit to you  
12 places where he worked.

13 MR. SHERR: I would object because  
14 it is where he did, not what he did.

15 JUDGE RAINEY: All right. We won't  
16 allow that. There is some testimony  
17 from Mr. Loch in terms of what he has  
18 done and where he has done that work.

19 \* \* \*

20 DOLORES MILLER,  
21 after having been first duly sworn, was  
22 examined and testified as follows:

23 \* \* \*

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JUDGE RAINEY: Keep your voice up and give us your full name and spell both names.

THE WITNESS: Dolores,  
D-O-L-O-R-E-S, Miller, M-I-L-L-E-R.

JUDGE RAINEY: Miss Miller, what is your address?

THE WITNESS: 1362 Pennsylvania Avenue, Emmaus, Pennsylvania.

JUDGE RAINEY: And the Zip code?

THE WITNESS: 18049.

JUDGE RAINEY: What is your relationship to Miss David?

THE WITNESS: I'm her sister.

JUDGE RAINEY: You have some testimony related to her complaint?

THE WITNESS: Yes. This summer I was over and standing against her car in the garage I felt vibrations which I never experienced before.

JUDGE RAINEY: You felt vibrations coming from the car?

THE WITNESS: From the car in the

1 garage.

2 JUDGE RAINEY: And you said that  
3 was this summer?

4 THE WITNESS: Uh-huh.

5 JUDGE RAINEY: Is there any other  
6 testimony that you want to offer?

7 THE WITNESS: I haven't felt  
8 anything in the house, actually. But I  
9 did feel that.

10 JUDGE RAINEY: That was this  
11 summer.

12 THE WITNESS: Uh-huh. That was  
13 kind of strange.

14 JUDGE RAINEY: Miss David, did you  
15 have any questions you want to ask of  
16 your sister?

17 MS. DAVID: I just thought she  
18 could tell you what my face looked like  
19 in 2003.

20 THE WITNESS: That was unreal.

21 MS. DAVID: And how often you saw  
22 it.

23 THE WITNESS: Yeah, I saw it lots  
24 of times. And I don't know if once she

1 was -- how should I say -- subject to  
2 that, some people -- once it was in her  
3 system naturally it would keep on. I  
4 just was in and out.

5 JUDGE RAINEY: Have you been a  
6 frequent visitor to Miss David's house  
7 since October of 2003?

8 THE WITNESS: Yeah.

9 JUDGE RAINEY: Any  
10 cross-examination for Miss Miller?  
11 Mr. Sherr?

12 MR. SHERR: I have none.

13 JUDGE RAINEY: Mr. Kanagy?

14 MR. KANAGY: Yes, I have a few  
15 questions.

16 \* \* \*

17 C R O S S

18 E X A M I N A T I O N

19 \* \* \*

20 BY MR. KANAGY:

21 Q. Miss Miller, you say that's the  
22 only time you ever felt anything unusual in Miss  
23 David's house?

24 A. Yes.

1 MR. KANAGY: No further questions,  
2 your Honor.

3 JUDGE RAINEY: Mr. Danks?

4 MR. DANKS: Nothing, your Honor.

5 JUDGE RAINEY: Thank you, Miss  
6 Miller. You may stand down.

7 I believe that concludes your  
8 direct case, Miss David. How do we  
9 want to proceed? Do we want to proceed  
10 on? Does anyone want a break?

11 MR. SHERR: I would state that the  
12 testimony I would be presenting to your  
13 Honor is very short. I probably could  
14 get that done.

15 JUDGE RAINEY: That's fine. Any  
16 party have any problem with that?

17 MR. KANAGY: I believe that makes  
18 sense, because it sounds like Miss  
19 David may have some more questions for  
20 Miss Rippke.

21 JUDGE RAINEY: Based on our earlier  
22 discussion, Mr. Sherr, because you  
23 stated that the written testimony  
24 you're not going to present but you

1 have a witness here today?

2 MR. SHERR: I was presenting two  
3 transcripts of written testimony, your  
4 Honor. I think you may have  
5 misunderstood, written testimony of  
6 Gerald Gasda.

7 JUDGE RAINEY: I don't have it.

8 MR. SHERR: No. I presented that.

9 JUDGE RAINEY: I have anticipated  
10 testimony of Dennis Harmon and/or  
11 Steven R. Henning, PE township  
12 engineers.

13 MR. SHERR: But I presented to you  
14 four transcripts.

15 JUDGE RAINEY: Okay. But you don't  
16 have any written testimony?

17 MR. SHERR: Yes, I do. I handed it  
18 up.

19 JUDGE RAINEY: Then hand that up to  
20 me.

21 MR. SHERR: I brought copies of  
22 both of these for the court reporter,  
23 because I had sent them. That's  
24 Mr. Balliet and this is Mr. Gasda.

1 JUDGE RAINEY: Okay. These are  
2 transcripts from a deposition.

3 MR. SHERR: No.

4 JUDGE RAINEY: Okay. These are  
5 transcripts from testimony that you  
6 took on November 14th.

7 MR. SHERR: Yes. I had a court  
8 reporter do that because the rules  
9 provided that I had to do that in  
10 numbered paper and I thought that was  
11 just the best way for me to do it. But  
12 it is my presentation of the written  
13 testimony of these two witnesses.

14 JUDGE RAINEY: It's normally  
15 provided in the way that Mr. Kanagy  
16 provided it, so that's why when I saw  
17 the transcript I thought this was from  
18 a deposition. But you actually had a  
19 court reporter come in and you asked  
20 questions and they were verbally  
21 responded to and we have a transcript  
22 of that.

23 MR. SHERR: Correct.

24 JUDGE RAINEY: Okay. I then have

1           those. You can give them to the court  
2           reporter.

3           MR. SHERR: Just so we're clear,  
4           the only written testimony I'm  
5           presenting today for your Honor's  
6           benefit is James Balliet and Gerald  
7           Gasda.

8           JUDGE RAINEY: Which of those two  
9           do you want to call first?

10          MR. SHERR: I would like to call  
11          Gerald Gasda.

12                           \* \* \*

13                           GERALD GASDA,  
14           after having been first duly sworn, was  
15           examined and testified as follows:

16                           \* \* \*

17                           E X A M I N A T I O N

18                           \* \* \*

19           JUDGE RAINEY: Provide both names  
20           and I'll ask you to keep your voice up.

21           THE WITNESS: Gerald, G-E-R-A-L-D,  
22           Gasda, G-A-S-D-A.

23           JUDGE RAINEY: By whom are you  
24           employed?

1 THE WITNESS: South Whitehall  
2 Township.

3 JUDGE RAINEY: What is your  
4 business title?

5 THE WITNESS: Township manager.

6 JUDGE RAINEY: What's your business  
7 address?

8 THE WITNESS: 4444 Walbert,  
9 W-A-L-B-E-R-T, Avenue, Allentown,  
10 Pennsylvania, 18104.

11 JUDGE RAINEY: Thank you. We have  
12 a document that's been previously  
13 marked as South Whitehall Township.  
14 Since this is actual testimony we'll  
15 call that statement number 1 as opposed  
16 to Exhibit number 1. Is that okay,  
17 Mr. Sherr?

18 MR. SHERR: Yes, your Honor.

19 JUDGE RAINEY: Go ahead with your  
20 Direct Examination.

21 MR. SHERR: Your Honor, my  
22 understanding is there is no need for  
23 me to repeat the testimony we have  
24 already presented; is that correct?

1 JUDGE RAINEY: Well, this testimony  
2 is for the purpose of what?

3 MR. SHERR: Mr. Gasda's testimony  
4 was simply to establish the fact that  
5 South Whitehall Township has no  
6 ownership interest nor does it operate  
7 the pumping station that is in question  
8 here.

9 JUDGE RAINEY: Let me ask if there  
10 is any cross-examination in regard to  
11 this document. Any questions for  
12 Mr. Gasda, Miss David? Do you have any  
13 questions for Mr. Gasda?

14 \* \* \*

15 C R O S S

16 E X A M I N A T I O N

17 \* \* \*

18 BY MS. DAVID:

19 Q. When I called the township to  
20 express there was concern with the pump station I  
21 had asked you or you asked me or told me that I  
22 could not accuse you of anything unless I had  
23 documentation. So I said I did from the  
24 environmentalist. At that point you sent Mr. Uff

1 to my home to pick up the papers. Do you recall  
2 that?

3 A. I recall having a conversation with  
4 you several years ago. Mr. Uff could possibly have  
5 come to your home to pick up some paperwork. I  
6 don't recall.

7 Q. Because that is what happened. You  
8 sent him over and that's why I thought South  
9 Whitehall owned the pump station. Because when I  
10 called South Whitehall you didn't have any trouble  
11 sending someone over to get my paperwork. That's  
12 all I wanted to state in that regard. The other  
13 question is, when I did call and said it was  
14 terrible in the house within minutes sometimes it  
15 was turned down. So then what would be your  
16 involvement to be able to do that if you --

17 A. I'm not sure how anything would be  
18 turned down, ma'am. The pump station runs by  
19 computer, basically.

20 Q. Well, that was my experience over  
21 the last three years when I -- in fact, when I had  
22 people come to do testing everything was turned  
23 pretty much way down and as soon as the people left  
24 it went back up to the same intensity it was

1 before. That was my experience.

2 JUDGE RAINEY: Off the record a  
3 moment.

4 \* \* \*

5 (Whereupon, a brief off-the-record  
6 discussion was held.)

7 \* \* \*

8 JUDGE RAINEY: Miss David, did you  
9 have any additional questions?

10 BY MS. DAVID:

11 Q. Just that when Mr. Uff picked up  
12 the papers and on another occasion when I went over  
13 to speak to Mr. Uff to show him the burns on my  
14 face I was directed to his office in the township  
15 building. So is the water authority in the same  
16 building as South Whitehall Township --

17 A. The water authority is a separate  
18 corporation that leases employees from the  
19 township.

20 Q. But the offices are there, correct?

21 A. They are in the same municipal  
22 complex, yes.

23 MS. DAVID: Thank you.

24 JUDGE RAINEY: Any other questions

1 for Mr. Gasda, Mr. Kanagy?

2 MR. KANAGY: No, your Honor.

3 JUDGE RAINEY: Mr. Danks?

4 MR. DANKS: Nothing, your Honor.

5 JUDGE RAINEY: Thank you, Mr.  
6 Gasda. Do you want to call your next  
7 witness, Mr. Sherr?

8 MR. SHERR: Yes, sir. James  
9 Balliet.

10 \* \* \*

11 JAMES BALLIET,  
12 after having been first duly sworn, was  
13 examined and testified as follows:

14 \* \* \*

15 E X A M I N A T I O N

16 \* \* \*

17 JUDGE RAINEY: Keep your voice up.  
18 Please be seated and provide your full  
19 name and spell your last name for the  
20 record.

21 THE WITNESS: James Balliet,  
22 B-A-L-L-I-E-T.

23 JUDGE RAINEY: Mr. Balliet, by whom  
24 are you employed?

1 THE WITNESS: South Whitehall  
2 Township Authority.

3 JUDGE RAINEY: What is your  
4 business title?

5 THE WITNESS: I am the foreman.

6 JUDGE RAINEY: What is your  
7 business address?

8 THE WITNESS: 4444 Walbert Avenue,  
9 W-A-L-B-E-R-T, Allentown, PA, 18104.

10 JUDGE RAINEY: Thank you. There  
11 was previously submitted a document  
12 that we are going to mark as South  
13 Whitehall Township Authority Statement  
14 Number 1, and it's my understanding  
15 that there are three exhibits attached  
16 to that statement; is that correct,  
17 Mr. Sherr?

18 MR. SHERR: Yes, your Honor, that  
19 is correct.

20 JUDGE RAINEY: Did you have any  
21 direct examination of this witness? If  
22 not please tell us what the purpose of  
23 the testimony provided by Mr. Balliet  
24 is.

1                   MR. SHERR: I have no additional  
2 testimony for Mr. Balliet at this time.  
3 His testimony establishes a number of  
4 things. Number one, he establishes  
5 that there is no connection, direct  
6 connection between the water pipe that  
7 leads into Mrs. David's house and the  
8 pumping station that's in question  
9 here. He also has testified with  
10 respect to the fact that they did this  
11 experiment and they turned off the  
12 pump. I believe Mr. Balliet was in the  
13 house with Mrs. David at the time and  
14 he didn't feel any difference either  
15 and does report what Mrs. David said at  
16 that time.

17                   The third general area in which  
18 Mr. Balliet has testified is that there  
19 is only in fact two pumps there. There  
20 had been testimony that there were  
21 three pumps. That there were only two  
22 pumps there, and that Mr. Balliet has  
23 documented at least on one occasion  
24 when both those pumps were down, there

1 was no pumps operating and we were  
2 still getting complaints from  
3 Mrs. David concerning the vibrations.  
4 Those are the subjects of his  
5 testimony.

6 JUDGE RAINEY: Let me start by  
7 asking you about your testimony  
8 regarding that there is no connection  
9 between the pumping station and Linda  
10 David's house. I'm going to ask you to  
11 just for the record to elaborate on  
12 that and actually I see on Exhibit  
13 number 1 you have a diagram that shows  
14 the pumping station.

15 THE WITNESS: I believe the  
16 question that was asked me, was there  
17 any direct connection to her house, and  
18 there is no direct connection to  
19 Mrs. David's house. The Exhibit that  
20 I've given was a map and that is  
21 showing the pump station and how the  
22 pipes actually head in a northern  
23 direction to Hamilton Boulevard and  
24 then in an eastern direction over to

1 the Reading Road area, and finally  
2 where it goes up Fairview Street, and I  
3 put an X where I believe Mrs. David's  
4 house is. And that's not a direct  
5 connection, because there are other  
6 houses in between and other services  
7 that have that pump station in between  
8 there.

9 JUDGE RAINEY: So there is no  
10 direct connection between any pipes  
11 that come from the pumping station to  
12 Miss David's house. That's your  
13 testimony?

14 THE WITNESS: That's correct.

15 JUDGE RAINEY: Is there an indirect  
16 connection?

17 THE WITNESS: Yes, there would be  
18 indirect connections.

19 JUDGE RAINEY: It's my  
20 understanding that the water pipe that  
21 actually feeds into Miss David's house  
22 is from Allentown; is that correct?

23 THE WITNESS: She's an Allentown  
24 customer, yes, sir.

1 JUDGE RAINEY: So she's served by  
2 Allentown pipe?

3 THE WITNESS: Yes.

4 JUDGE RAINEY: Do the pipes from  
5 the South Whitehall Township Authority  
6 connect with the Allentown pipes?

7 THE WITNESS: It's connected to the  
8 Allentown pipe, yes.

9 JUDGE RAINEY: Do you know where  
10 that connection takes place?

11 THE WITNESS: Yes. If you look on  
12 the exhibit it is down by Reading Road  
13 and Fairview Street. It's a little  
14 hard to see, but it's down at that  
15 intersection. Fairview actually comes  
16 around the bend and meets up with  
17 Reading Road.

18 JUDGE RAINEY: At Reading and  
19 Fairview there is a connection.

20 THE WITNESS: Yes.

21 JUDGE RAINEY: Miss David, do you  
22 have questions for Mr. Balliet?

23 \* \* \*

24 C R O S S

## E X A M I N A T I O N

\* \* \*

1  
2  
3 BY MS. DAVID:

4 Q. I would just like to know when did  
5 the City of Allentown connect to South Whitehall's  
6 system.

7 A. When did the City connect? The  
8 City did not connect to South Whitehall Township.

9 Q. There was something in the paper  
10 and Mr. Danks said something to that effect this  
11 summer during one of the conference calls I  
12 believe. I believe it was May 10th, the conference  
13 call we had with the Judge. I believe Mr. Danks  
14 said the City did connect to South Whitehall at one  
15 point.

16 JUDGE RAINEY: Mr. Balliet is  
17 testifying that the City of Allentown  
18 did not connect with South Whitehall  
19 Township Authority pipes. Is that your  
20 testimony?

21 THE WITNESS: The City did not make  
22 that connection. South Whitehall  
23 connected to the City of Allentown.

24 BY MS. DAVID:

1 Q. Okay. There we go. Just reversed.

2 What date was that?

3 A. I don't know, ma'am.

4 JUDGE RAINEY: Any other questions,  
5 Mrs. David? Do you have an approximate  
6 time period when that occurred,  
7 Mr. Balliet?

8 THE WITNESS: I'm sorry?

9 JUDGE RAINEY: Approximately when  
10 that connection by South Whitehall with  
11 the City of Allentown took place.

12 THE WITNESS: It would have been  
13 connected when we built the pump  
14 station, sir, and I don't remember the  
15 exact date.

16 JUDGE RAINEY: The pumping station  
17 was built sometime ago? Do you have  
18 any idea as to when the pumping station  
19 was built?

20 THE WITNESS: Yes. Back in -- I  
21 really don't know the date. I'm sorry.  
22 It was during this time period.

23 JUDGE RAINEY: During the time  
24 period of 2004?

1 THE WITNESS: I don't remember.

2 JUDGE RAINEY: It was fairly  
3 recent, then. Last three, four years  
4 or so? Okay. Mr. Gasda says he knows  
5 the answer. Yes, Mr. Gasda?

6 MR. GASDA: It was built  
7 approximately in the year 2000.

8 JUDGE RAINEY: Thank you,  
9 Mr. Gasda.

10 MS. DAVID: Can I ask if it was  
11 built in 2000 when was it first  
12 utilized or put into operation?

13 MR. GASDA: After it was completed,  
14 ma'am.

15 MS. DAVID: In 2000?

16 MR. GASDA: Yes. I can't give you  
17 an exact date, but it was a number of  
18 years prior to receiving complaints  
19 about your problem.

20 MS. DAVID: Okay.

21 JUDGE RAINEY: Any additional  
22 questions for Mr. Balliet, Ms. David?

23 MS. DAVID: We had wondered what  
24 exhibits you had and if we were allowed

1 to see his exhibits.

2 JUDGE RAINEY: The exhibits that  
3 are attached to his testimony?

4 MS. DAVID: Okay.

5 JUDGE RAINEY: Do you have his  
6 testimony?

7 MS. DAVID: Yes, I do. I just want  
8 to know, are these the pumps at the  
9 pump station at South Whitehall?

10 JUDGE RAINEY: What are you  
11 referring to?

12 MS. DAVID: Pictures of the pump  
13 station.

14 JUDGE RAINEY: Is that your  
15 Exhibit?

16 MS. DAVID: Yes. It's one of them.

17 JUDGE RAINEY: Can you refer to the  
18 Exhibit number?

19 MS. DAVID: 4D.

20 JUDGE RAINEY: Is it the first  
21 picture in 4D?

22 MS. DAVID: Yes.

23 JUDGE RAINEY: You were asking  
24 Mr. Balliet a question about that?

1 MS. DAVID: He said there were two  
2 pumps in the pump station and when you  
3 look at this how many do you see?

4 JUDGE RAINEY: Mr. Balliet, do you  
5 have a picture of that in front of you?

6 THE WITNESS: No, I don't.

7 MS. DAVID: You can have this one.

8 THE WITNESS: That could be the  
9 configuration of the station, yes.

10 BY MS. DAVID:

11 Q. Are there two pumps there or three?

12 A. There are two pumps there.

13 Q. What's the third pump on the  
14 bottom?

15 A. I don't know what you're talking  
16 about, ma'am. There's two pumps. On the left is a  
17 pump and in the center is a pump and on the right  
18 is a discharge plate.

19 JUDGE RAINEY: Hold up the document  
20 and show us where the pumps are and  
21 also so that Miss David can see.

22 THE WITNESS: This is a pump here  
23 on the left, in the center is a pump  
24 and on the right is a discharge pipe

1 (indicating).

2 BY MS. DAVID:

3 Q. Is there a chlorine pump in the  
4 system?

5 A. Chlorine injection pump, yes,  
6 ma'am.

7 Q. Where is that?

8 A. In a separate room.

9 JUDGE RAINEY: Any further  
10 questions, Ms. David?

11 BY MS. DAVID:

12 Q. I guess I just want to ask, is  
13 there only one pump running at one time all the  
14 time or are there more than one running at night?

15 A. For what time period? Up until  
16 June of this year only one pump could automatically  
17 be run at a time.

18 Q. Okay. From midnight until 7:00  
19 a.m. are there one -- is there one?

20 A. In automatic mode only one pump is  
21 allowed to run up until June of this year.

22 Q. And then what happened?

23 A. We reconfigured the computer system  
24 and it now can run two pumps automatically at a

1 time after June of this year.

2 Q. Most of the time when would the two  
3 be running then?

4 A. Only an emergency operation at  
5 South Whitehall water system would need extra water  
6 called for.

7 Q. Is there ever a time when the two  
8 are running after midnight?

9 A. That has not happened since we put  
10 the upgrade in.

11 MS. DAVID: Thank you.

12 JUDGE RAINEY: Mr. Kanagy?

13 MR. KANAGY: No, no questions, your  
14 Honor.

15 JUDGE RAINEY: Mr. Danks?

16 MR. DANKS: Just briefly, your  
17 Honor.

18 \* \* \*

19 C R O S S

20 E X A M I N A T I O N

21 \* \* \*

22 BY MR. DANKS:

23 Q. I just want to refer you to what's  
24 labeled here Defendant's Exhibit Balliet-1. It's

1 that distribution diagram of the water system.

2 You're basically familiar with the water  
3 distribution system for where Allentown and South  
4 Whitehall Authority connect; is that correct?

5 A. Yes.

6 Q. To your knowledge, this diagram is  
7 reasonably accurate?

8 A. Yes.

9 Q. Just to clean up the fact that  
10 there is not a lot of information on the diagram,  
11 where it says Salisbury Township in the lower  
12 middle of the document and just above it there is a  
13 dash, a line, on the other side of the line from  
14 the word Salisbury Township that's South Whitehall  
15 Township; is that correct?

16 A. That's correct.

17 Q. South Whitehall Township Authority  
18 service area is coterminous with South Whitehall  
19 Township; is that correct?

20 A. Yes.

21 Q. So then we follow the dashed line  
22 around and it runs up Reading Road and it works its  
23 way back to the left side of the page so that the  
24 South Whitehall Township Authority area is

1 essentially in the middle left side of the page; is  
2 that correct?

3 A. Yes.

4 Q. To the upper right-hand side is the  
5 City of Allentown?

6 A. Yes.

7 Q. We really have three municipalities  
8 on here but just only one is labeled. So I'm just  
9 trying to get it on the record. And where the  
10 pumping location station is located, that Hamilton  
11 Booster Pump Station, is that how it's labeled?

12 A. Yes.

13 Q. That's right on the line between  
14 Allentown and South Whitehall Township?

15 A. Yes.

16 Q. But it's in South Whitehall  
17 Township?

18 A. That's correct.

19 Q. And from your knowledge of the  
20 water distribution system the water in the area  
21 flows from the City of Allentown system to the  
22 South Whitehall system?

23 A. Yes.

24 Q. Is there ever a time that the

1 pumping station is pumping back toward Allentown?

2 A. No.

3 MR. DANKS: Nothing further, your  
4 Honor.

5 JUDGE RAINEY: Let me follow up,  
6 Mr. Balliet. Looking at that diagram  
7 we have heard some testimony that the  
8 Hamilton booster pumping station is  
9 about 200 yards from where Ms. David's  
10 home is; is that correct?

11 THE WITNESS: The distance?

12 JUDGE RAINEY: Yes.

13 THE WITNESS: I have no idea what  
14 the distance is.

15 MR. DANKS: Just for the record,  
16 your Honor, the Exhibit has a  
17 handwritten notation "not to scale."

18 JUDGE RAINEY: Okay. Nothing  
19 further for Mr. Balliet. You may stand  
20 down.

21 MR. SHERR: That would be all the  
22 testimony that we would present today,  
23 your Honor.

24 JUDGE RAINEY: You want to move for

1 the admission into evidence of the  
2 exhibits and your statements?

3 MR. SHERR: Yes, we move for the  
4 introduction of the two statements and  
5 the three exhibits attached to  
6 Mr. Balliet's statement.

7 JUDGE RAINEY: Any objection of  
8 South Whitehall statement number 1 and  
9 South Whitehall Township Authority  
10 statement number 1 and the three  
11 attached exhibits? Any objection?  
12 Hearing none then the documents will be  
13 admitted into evidence. We'll take a  
14 break now.

15 \* \* \*

16 (Whereupon, a brief recess was taken.)

17 \* \* \*

18 JUDGE RAINEY: I believe we are at  
19 the juncture to take the direct case of  
20 PPL. Mr. Kanagy, call your witness.

21 MR. KANAGY: Yes, I call Miss  
22 Kristie Rippke.

23 \* \* \*

24 KRISTIE RIPPKE,

1 after having been first duly sworn, was  
2 examined and testified as follows:

3 \* \* \*

4 E X A M I N A T I O N

5 \* \* \*

6 JUDGE RAINEY: Keep your voice up  
7 particularly with the windows open, and  
8 I'm going to ask you to provide your  
9 full name and spell both names.

10 THE WITNESS: Kristie,  
11 K-R-I-S-T-I-E, Rippke, R-I-P-P-K-E.

12 JUDGE RAINEY: By whom are you  
13 employed?

14 THE WITNESS: PPL Electric  
15 Utilities

16 JUDGE RAINEY: What is your  
17 business title.

18 THE WITNESS: Support engineer.

19 JUDGE RAINEY: What's your business  
20 address?

21 THE WITNESS: 827 Hausman Road,  
22 H-A-U-S-M-A-N, Allentown, Pennsylvania  
23 18104.

24 JUDGE RAINEY: Thank you. Proceed,

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Mr. Kanagy.

\* \* \*

D I R E C T  
E X A M I N A T I O N

\* \* \*

BY MR. KANAGY:

Q. Miss Rippke, do you have before you what's been marked as PPL Electric Statement number 1?

A. Yes.

Q. Is this your prepared written testimony in this proceeding?

A. Yes.

MR. KANAGY: May I approach and hand two copies to the court reporter, your Honor?

JUDGE RAINEY: Yes, you may.

MR. KANAGY: I believe Miss David has a copy, your Honor, and I believe your Honor and the other parties do as well. Your Honor, at this time I have some additional testimony I would like to get from Miss Rippke based upon the testimony given by Miss David and

1 Mr. Loch.

2 JUDGE RAINEY: Go ahead.

3 MR. KANAGY: Your Honor, I do have  
4 two additional exhibits as well. If I  
5 could hand them out at this time so  
6 everyone has them. I'll identify them.  
7 The first one is PPL Exhibit Number 9.  
8 This is a call log of the calls made  
9 into PPL for Miss David's account. And  
10 the second, your Honor, it's not marked  
11 and I guess it's a glossy. I should  
12 try and mark it. It's entitled PPL  
13 Electric and Magnetic fields. It's a  
14 brochure regarding EMF and I'll have  
15 Miss Rippke explain the Exhibit at that  
16 time.

17 JUDGE RAINEY: You want to mark  
18 that as Exhibit Number 10?

19 MR. KANAGY: Yes, I'll mark it as  
20 Exhibit Number 10. It won't show up  
21 that well because my pen is blue and  
22 the brochure is blue as well. I'll  
23 hand these out and if the parties would  
24 want to mark that. I did mark the

1 court reporter's and yours. And here,  
2 your Honor, is PPL Exhibit Number 9 and  
3 it is marked on the bottom.

4 Your Honor, at this time would it  
5 be helpful if I would summarize Miss  
6 Rippke's direct testimony for the  
7 Court?

8 JUDGE RAINEY: Maybe she can  
9 summarize it.

10 BY MR. KANAGY:

11 Q. Okay. Miss Rippke, can you  
12 summarize the direct testimony that you have  
13 prepared in this proceeding?

14 A. In the testimony I stated the  
15 various testing that was done at Miss David's home  
16 by PPL and what the results of those tests were and  
17 also testing that was done at the pump house and  
18 the results of those tests.

19 JUDGE RAINEY: Would you want her  
20 to do more detailed than that?

21 MR. KANAGY: I'm sorry, your Honor?

22 JUDGE RAINEY: Were you going to  
23 ask her for little more detail?

24 MR. KANAGY: A little bit more,

1                   yes.

2           BY MR. KANAGY:

3                   Q.     If you could go through each of the  
4           exhibits and explain what they are, that may help  
5           explain the testimony and what's put forth in  
6           there.

7                   A.     Okay. Exhibit Number 1 is the  
8           letter that was sent to Miss David regarding the  
9           first EMF testing that was done at her residence.

10                   JUDGE RAINEY: Miss Rippke, is this  
11           a letter from you?

12                   THE WITNESS: Yes, that's correct.

13                   JUDGE RAINEY: Reddinger. Was that  
14           your former name?

15                   THE WITNESS: Yes, that was my  
16           former name.

17                   JUDGE RAINEY: All right. Go  
18           ahead.

19           BY MR. KANAGY:

20                   Q.     Would you please explain the  
21           results as you go through it, Miss Rippke?

22                   A.     When I did the first testing at  
23           Miss David's house Mr. Loch was there and he  
24           reported all the measurements that are on Page 2 of

1 that Exhibit. And I went into each room of the  
2 home and I measured the EMF using an EMDEX meter  
3 and all the measurements that you see are in  
4 milligauss and they range from looks like 1.7  
5 milligauss to about 3 and a half milligauss, with  
6 the exception of right at the water meter we  
7 measured 19 milligauss -- I'm sorry, at the door  
8 which is close to the meter we measured 19 and at  
9 the meter itself we measured 20 milligauss.

10 Q. Are any of these readings harmful?

11 A. There's still a lot of research  
12 being done on EMF and there's no conclusions that  
13 have been made as to what levels of EMF are  
14 harmful, but these are typical for residential  
15 homes.

16 Q. Could you explain what PPL Exhibit  
17 Number 2 is?

18 A. Exhibit Number 2 is a letter I sent  
19 to Miss David regarding the stray voltage  
20 investigation that was done at her home.

21 Q. When was that conducted?

22 A. On June 17th, 2004.

23 Q. What did you find at that  
24 investigation?

1           A.     We measured the voltage across a  
2     500 ohm resistor, which is the standard method for  
3     doing this kind of study, about 6 feet in the  
4     ground around her home, and then we recorded the  
5     measurements that we got. They ranged from less  
6     than one millivolt to close to 3 millivolts.  
7     Typically values of less than one volt are not a  
8     concern. A millivolt is one one thousandth of a  
9     volt, so these are significantly less than one  
10    volt.

11           Q.     Could you please turn to PPL  
12    Exhibit Number 3?

13           A.     Yes.

14           Q.     Could you please explain what PPL  
15    Exhibit Number 3 is?

16           A.     Exhibit Number 3 was a letter that  
17    I sent to Miss David regarding the second set of  
18    EMF measurements that were taken at her house on  
19    June 30th, 2006. This was done in the same manner  
20    as the first measurement in 2004. On the second  
21    page you can see the measurements ranged from about  
22    one milligauss to as much as 9.2 milligauss, and  
23    that 9.2 milligauss was again near the water meter.  
24    It was on the inside of her house on the opposite

1 side of the water heater.

2 Q. Are these readings typical for  
3 residential residents?

4 A. Yes, they are.

5 Q. Would you please turn to PPL  
6 Exhibit Number 4?

7 A. Yes.

8 Q. Could you please explain what PPL  
9 Exhibit Number 4 is?

10 A. Exhibit Number 4 is a letter I sent  
11 to Miss David with the results from a second stray  
12 voltage investigation that was done at her home on  
13 June 30th, 2006. Again it was done in the same  
14 manner as the first investigation in 2004 and the  
15 measurements are shown on Page 2. They ranged from  
16 a little over one millivolt to as much as  
17 9.2 millivolts. Again your millivolt is one one  
18 thousandth of a volt and measurements under one  
19 volt are considered normal.

20 Q. Could you please turn to PPL  
21 Exhibit Number 5, please?

22 A. Uh-huh.

23 Q. Could you please explain what PPL  
24 Exhibit Number 5 is? It's further described in

1 your testimony but describe what this shows.

2 A. We installed a recording volt  
3 meter, we meaning PPL, at Miss David's home at her  
4 meter base, and we reported the voltage over a  
5 period of time from July 11th, 2006 through  
6 July 18th, 2006. And this graph shows the RMS  
7 voltages that were recorded during that time  
8 period. RMS voltage numbers should be within five  
9 percent of nominal voltage. Nominal voltage in  
10 this case is 120 volts, so that means they should  
11 be between 114 and 126 volts.

12 JUDGE RAINEY: Would you explain  
13 what RMS stands for?

14 THE WITNESS: It stands for root  
15 means square. It's an average voltage.  
16 It's the standard method for measuring  
17 voltages.

18 BY MR. KANAGY:

19 Q. Did the voltage measured to Miss  
20 David over that time comply with the Commission's  
21 regulations?

22 A. Yes, they did.

23 JUDGE RAINEY: Can you cite to the  
24 regulations? Can you give the

1 citations?

2 MR. KANAGY: Your Honor, I believe  
3 it's 52 PA code, section 57.14. I  
4 believe that's correct.

5 JUDGE RAINEY: 52PA code, section  
6 57.14, is that what you were referring  
7 to?

8 THE WITNESS: Yes.

9 JUDGE RAINEY: All right. Go  
10 ahead.

11 MR. KANAGY: Thank you, your Honor.

12 BY MR. KANAGY:

13 Q. Miss Rippke, can you please turn to  
14 PPL Exhibit Number 6, please?

15 A. Uh-huh.

16 Q. Can you explain what Exhibit Number  
17 6 is?

18 A. Exhibit Number 6 shows the  
19 measurements that were taken when I performed the  
20 stray voltage study at the pump house on Hamilton  
21 Boulevard, which is close to Miss David's house.  
22 Those measurements were taken November 9th, 2006  
23 and they ranged from 1.2 millivolts to  
24 26.7 millivolts.

1 Q. Are these readings higher than what  
2 you measured at Miss David's house?

3 A. Yes, they are higher than what I  
4 measured at Miss David's house.

5 Q. Is there an explanation for that?

6 A. Well, part of the reason why I  
7 think the readings in the -- on the back side of  
8 the pump house, that's the side opposite the  
9 parking lot, were higher is because it's a shaded  
10 area, it's bordered by the pump house and a row of  
11 arborvitae trees and the ground was very moist and  
12 moist soil will give higher readings than dry soil.

13 Q. Do these readings present any type  
14 of dangerous conditions?

15 A. No. These readings are still much  
16 less than one volt.

17 Q. Thank you. Please turn to PPL  
18 Exhibit Number 7, please?

19 A. Uh-huh.

20 Q. Please explain what Number 7 is?

21 A. PPL also installed a recording volt  
22 meter at the pump house's service at their meter  
23 base and we recorded the voltages there from  
24 November 7th, 2006 through November 14th, 2006 and

1 there are two pages to this Exhibit. This shows  
2 the RMS voltages for all three phases of the pump  
3 house's service. And because they're a three phase  
4 customer we must provide voltages within 10 percent  
5 of nominal, so that means between 108 volts and  
6 132 volts. That's what this shows.

7 Q. Was this voltage put on for 24  
8 hours a day?

9 A. Yes.

10 Q. For the time period?

11 A. Yes, it was.

12 Q. Was the voltage supplied to the  
13 pump house within the Commission's regulations?

14 A. Yes.

15 Q. Please turn to PPL Exhibit Number  
16 8, please.

17 A. Uh-huh.

18 Q. Please explain what PPL Exhibit  
19 Number 8 is?

20 A. This is PPL Electric Utility's  
21 rules for electric service.

22 Q. It's certain excerpts from PPL's  
23 tariff; is that correct?

24 A. Yes, that's correct.

1           Q.     Miss Rippke, in her testimony today  
2 Miss David indicated that she had called PPL  
3 Electric on multiple occasions before June 4th, I  
4 believe, 2004 to report problems with her electric  
5 service. Do you -- does PPL keep records of  
6 customer calls that come into the customer service  
7 center?

8           A.     Every time a customer calls the  
9 contact center the rep enters a contact in their  
10 account in our customer data base system.

11          Q.     So every time the customer calls  
12 into that line it's put on PPL's system?

13          A.     That's correct.

14          Q.     Does PPL have any record of Miss  
15 David calling regarding this problem, this  
16 perceived problem to her house before June 4th,  
17 2006?

18          A.     No.

19          Q.     Do you have before you what's been  
20 marked, and I have a copy here, PPL Exhibit Number  
21 9?

22          A.     Yes.

23          Q.     Could you please explain what PPL  
24 Exhibit Number 9 is?

1           A.     Exhibit Number 9 is a printout of  
2 all the contacts for Miss David's account back as  
3 long as we have record of that. It goes back --  
4 the last contact was August 30th, 2006, going back  
5 to January 1st, 2001.

6           Q.     So does this Exhibit show any  
7 contacts regarding this -- Exhibit on Page 2 at the  
8 bottom it starts at 1-1-2001, correct?

9           A.     Correct.

10          Q.     Does it show -- when is the first  
11 contact that showed on this Exhibit that shows when  
12 a problem regarding Miss David's electric service  
13 was reported to PPL?

14          A.     On June 4th, 2004 Alan Loch from  
15 Trinity Associates contacted PPL about the problems  
16 that Miss David was having and requested an EMF  
17 investigation be done at her premises.

18          Q.     What did you do in response to that  
19 contact?

20          A.     I set up an appointment with  
21 Mr. Loch and Miss David to conduct that EMF  
22 investigation.

23          Q.     When were those tests conducted  
24 again?

1 A. That was on June 8th, 2004.

2 Q. Did you perform any other testing  
3 or were both the EMF and stray voltage tests  
4 conducted on June 8th, 2006?

5 A. No. When I was at Miss David's  
6 home on June 8th to do the EMF investigation, in  
7 conversation with Alan Loch we decided it might be  
8 prudent to do a stray voltage study, and that study  
9 was done at a later date.

10 Q. I would note under the third entry  
11 down, I believe, on the second page, Page 2, that  
12 Miss David also called on June 21st, 2004. Could  
13 you please explain that entry?

14 A. Yes. The comment that was entered  
15 says that the customer called to report impulses  
16 come out of her couch during the night from the  
17 Allentown water pumps. She said she's going to sue  
18 us. No action taken.

19 Q. Why would that say no action taken  
20 there?

21 A. Because at that time when she  
22 called in there would have already have been this  
23 two down from that, the June 4, 2004 entry, saying  
24 that that issue had already been referred to the

1 engineering department.

2 Q. So PPL had already responded to  
3 that issue and evidence by your testing at her  
4 house, correct?

5 A. That's correct.

6 Q. Miss Rippke, do you have before you  
7 PPL Exhibit Number 10?

8 A. Yes.

9 Q. Would you please explain what  
10 Exhibit Number 10 is?

11 A. Exhibit Number 10 is a brochure  
12 that we distribute to customers who ask for it on  
13 electric and magnetic fields.

14 Q. Would you please read for me, as  
15 you open Exhibit Number 10, it opens up and there  
16 is a couple of paragraphs titled "EMF Are All  
17 Around Us" on the first page that opens up. Could  
18 you please read that for the Court?

19 A. "Electric and magnetic fields occur  
20 in nature and in all living things. The earth, for  
21 instance, has a magnetic field which makes the  
22 needle of a compass point north. Electric fields  
23 and magnetic fields of a different type also  
24 surround every wire that carries electricity. In

1 everyday life these EMF arise from several basic  
2 sources, including power lines, electrical  
3 appliances, home and building wiring, other utility  
4 lines and cables and currents flowing on water  
5 pipes. Though they often occur together EMF are  
6 made up of two separate components."

7 Q. That's fine. Could you open PPL  
8 Exhibit Number 10 to the middle and could you  
9 please explain what that chart is in the middle of  
10 PPL Exhibit 10?

11 A. The chart lists average magnetic  
12 field strengths that you could experience from  
13 various appliances.

14 Q. Could you please explain what  
15 magnetic field you'll get 6 inches from a can  
16 opener?

17 A. 6 inches from a can opener you  
18 would expect to see 500 to 1,500 milligauss.

19 Q. What was the highest reading that  
20 you determined at Miss David's house?

21 A. I believe it was 20 milligauss.

22 Q. So is that considerably lower than  
23 1,500 milligauss?

24 A. Yes.

1           Q.     In her direct testimony Miss David  
2 indicated that she got burns on her face and she  
3 felt like that was coming from the electrical --  
4 the EMF or stray voltage. Do you believe that  
5 burns on Miss David's face would be coming from  
6 stray voltage or EMF?

7           A.     I've never heard of that happening  
8 before, no.

9           Q.     With regard to that Miss David also  
10 testified that she has dead trees and a dead  
11 rosebush outside her house. Do you believe that's  
12 coming from EMF or stray voltage?

13          A.     Again, I've never heard of that  
14 being a problem, no.

15          Q.     Do you believe in the testing that  
16 you performed at Miss David's house, do you believe  
17 that PPL electric service to Miss David's residence  
18 is safe and reasonable?

19          A.     Yes, I do.

20          Q.     In the testing that you performed  
21 at the pumping station do you believe that PPL  
22 electric service to the pumping station is safe and  
23 reasonable?

24          A.     Yes, I do.

1 Q. In her direct testimony Miss David  
2 indicated she was contacted -- or that after EPA  
3 investigated her situation that the situation got  
4 better. Was PPL ever contacted by EPA regarding  
5 Miss David's electrical service?

6 A. No, it was not.

7 Q. Did PPL Electric change its service  
8 around June 2004 to Miss David's residence?

9 A. No, they did not.

10 Q. Miss Rippke, does electrical  
11 current flow through wood?

12 A. Not if the wood is dry, no.

13 Q. Miss David also indicated that  
14 there were up to six or seven amps of current in  
15 her water pipe. Do you believe that that could  
16 cause her kitchen floor to get hot?

17 A. I don't believe that that would  
18 cause the floor to get hot, no.

19 Q. When you tested for stray voltage  
20 at Miss David's house did you test between the  
21 house and the transformer?

22 A. Yes, I did.

23 Q. Did you find any stray voltage  
24 concerns?

1           A.     No, I did not.

2                   MR. KANAGY:  Your Honor, I have no  
3                   further questions for Miss Rippke.  I  
4                   would like to move for admission of PPL  
5                   Statement Number 1 and Exhibits 1  
6                   through 10.

7                   JUDGE RAINEY:  Any objections to  
8                   the admission into evidence of PPL  
9                   Statement Number 1 and PPL Exhibits 1  
10                  through 10?

11                  MS. DAVID:  The only objection I  
12                  have is to the phone record, because I  
13                  called PPL many times, not just two.

14                  JUDGE RAINEY:  You'll have some  
15                  opportunity to cross examine Miss  
16                  Rippke with regard to that.  We are  
17                  going to admit into evidence PPL  
18                  Statement Number 1 and Exhibits 1  
19                  through 10.  And we'll do  
20                  cross-examination at this time.  Miss  
21                  David?

22                                   \* \* \*

23                                   C R O S S

24                                   E X A M I N A T I O N

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BY MS. DAVID:

Q. Did you at any time enter the attic or crawl space of my home to test the wires in my home?

A. No, I did not.

Q. How many houses would have grounds attached to the water pipes in your experience?

A. Many homes have grounds attached to the water pipes.

Q. Would there be a reason why there was no problem in my home for 13 years and suddenly there would be a problem?

A. I don't know. I can't answer that.

Q. How long did you work for PPL?

A. Five and a half years.

Q. And before that you worked for?

A. I worked for Lockheed Martin.

Q. And before that?

A. I was in school.

Q. So you've only worked for five years?

A. I've worked for PPL for five and a half years.

1 Q. So seven years you were an  
2 electrical engineer?

3 A. No. Six and a half years I've been  
4 out of school.

5 Q. And may I ask, when you put the  
6 monitor on my meter on July 11th of this year why  
7 did it take three, four months for you to send a  
8 report? 11-14 is when I got the report about that.

9 A. Because the case was in litigation  
10 the letter had to go through an internal regulatory  
11 review and I sent the letter to you as soon as I  
12 got it back.

13 Q. The last time you were at my home  
14 to do the stray voltage testing when I came to the  
15 door could you just say what my face looked like?

16 A. I don't recall, ma'am. I'm sorry.

17 Q. I think you do. Thank you. One  
18 other question. Are any capacitor banks in the  
19 radius of 10 miles of my home?

20 A. Yes.

21 Q. Thank you. Can I maybe ask you to  
22 read something from the front of an electrical  
23 magazine. Just read this.

24 A. It says EMF. Recent theories may

1 link exposure to power frequency magnetic fields  
2 and childhood cancer.

3 JUDGE RAINEY: What magazine is  
4 that from?

5 MS. DAVID: The Magazine of  
6 Electrical Design, Construction and  
7 Maintenance, EDC and M.

8 JUDGE RAINEY: And what's the date  
9 of it?

10 MS. DAVID: September 2006.

11 JUDGE RAINEY: Are you done with  
12 your questions?

13 MS. DAVID: Yes.

14 JUDGE RAINEY: Mr. Sherr?

15 MR. SHERR: I have no questions.

16 JUDGE RAINEY: Mr. Danks?

17 MR. DANKS: Nothing, your Honor.

18 MR. KANAGY: Your Honor, I have one  
19 follow-up question.

20 JUDGE RAINEY: Let me just ask a  
21 question, and this question was  
22 prompted by testimony that was given by  
23 Mr. Loch with regard to the  
24 configuration of the PPL lines. He

1                   stated something about a U pattern that  
2                   he thought was problematic. Do you  
3                   have any testimony with regard to that?

4                   THE WITNESS: I believe Mr. Loch  
5                   stated that because the wires were in a  
6                   U shape that that might be causing  
7                   excessive magnetic fields. It wouldn't  
8                   matter if the wires were in a U shape  
9                   or in a straight line. They still  
10                  conduct magnetic fields. So the fact  
11                  they're in a U shape I don't think has  
12                  any bearing on this situation.

13                 JUDGE RAINEY: You don't think that  
14                 creates any greater magnetic fields  
15                 than if they were in a straight line?

16                 THE WITNESS: No, I do not.

17                 JUDGE RAINEY: Redirect,  
18                 Mr. Kanagy?

19                 MR. KANAGY: Yes, just a few  
20                 questions.

21                                   \* \* \*

22                                   R E D I R E C T

23                                   E X A M I N A T I O N

24                                   \* \* \*

1 BY MR. KANAGY:

2 Q. It's true you're a professional  
3 engineer; is that correct?

4 A. Yes, that's correct.

5 Q. And you're licensed in the State of  
6 Pennsylvania to do engineering, electrical  
7 engineering?

8 A. Yes, I am.

9 Q. Is it also correct that if there  
10 were -- if the U shaped wires were creating more  
11 magnetic fields that you would have measured that  
12 when you measured the EMF at Miss David's house?

13 A. That's correct.

14 MR. KANAGY: Thank you, your Honor.  
15 No further question.

16 JUDGE RAINEY: Based on  
17 Mr. Kanagy's questions and my question  
18 do you have any recross based on those  
19 questions, Ms. David?

20 MS. DAVID: The only thing I would  
21 like to refer to is once again Exhibit  
22 3E. This is from the EPA engineer.

23 MR. KANAGY: Your Honor, that  
24 exhibit's hearsay and I think we have

1 referred to it already. I'm not sure  
2 what the point is.

3 JUDGE RAINEY: Let's hear the  
4 question first.

5 MS. DAVID: The EPA from  
6 Philadelphia sent engineers to test at  
7 my home. I don't think this is  
8 hearsay. This is a report.

9 JUDGE RAINEY: What is your  
10 question?

11 \* \* \*

12 R E C R O S S

13 E X A M I N A T I O N

14 \* \* \*

15 BY MS. DAVID:

16 Q. My question is, in the middle of  
17 the second paragraph, the second paragraph says the  
18 EPA does not have legislative authority to address  
19 environmental problems in residential buildings;  
20 however, in order to provide as much assistance for  
21 this complex situation EPA's region three office  
22 visited my home on June 2nd, 2004. A synopsis of  
23 their findings at the time of this visit showed the  
24 following: Very low levels of stray electrical

1 voltage current except near the transformer pole  
2 that services the dwelling. When you tested at the  
3 transformer pole you found nothing?

4 A. I'm confused as to what they tested  
5 here. They're not specific, unfortunately, and I  
6 can't say if what I tested was the same thing that  
7 they tested.

8 Q. It says transformer pole that  
9 services the dwelling. It's pretty specific. It's  
10 the wires that come into my house from the  
11 transformer.

12 A. But when I tested the stray voltage  
13 in the ground between your home and the transformer  
14 I did not get high levels.

15 Q. I guess my question is, then why  
16 did they? When he put a device in my laundry room  
17 closet where the overhead wire comes into my home  
18 he said that is high. And he put it in the report.  
19 And who took care of it? I did not.

20 A. Without knowing more information  
21 about what they tested and how they tested I can't  
22 answer that question.

23 JUDGE RAINEY: I'm going to allow  
24 if you have any additional questions

1 based on Miss David's questions I'll  
2 allow you to ask it.

3 MR. KANAGY: I have a question or  
4 two, your Honor.

5 \* \* \*

6 R E D I R E C T

7 E X A M I N A T I O N

8 \* \* \*

9 BY MR. KANAGY:

10 Q. Miss Rippke, this letter that's the  
11 basis of Miss David's complaint, or one of the  
12 bases for the complaint, does it indicate what low  
13 levels or high levels are?

14 A. No, it does not.

15 Q. Does it indicate how the stray  
16 voltage was tested?

17 A. No.

18 Q. Does it indicate exactly where the  
19 stray voltage was tested?

20 A. No, it does not, except for the  
21 paragraph that talks about near the transformer  
22 pole.

23 Q. But it doesn't say exactly where  
24 near the transformer pole it was tested, does it?

1 A. No, it does not.

2 MR. KANAGY: No further questions,  
3 your Honor.

4 \* \* \*

5 R E C R O S S

6 E X A M I N A T I O N

7 \* \* \*

8 BY MS. DAVID:

9 Q. My question is, did anybody from  
10 PPL test at that pole, at the transformer pole?

11 A. Did we test what?

12 Q. Stray voltage.

13 A. Yes, we did.

14 Q. Not only in the ground from the  
15 pole to my house, but the pole itself. Did anybody  
16 test to see if there was a problem with the  
17 transformer pole?

18 A. I don't know how we would test the  
19 pole itself.

20 Q. The transformer, excuse me.

21 A. All the testing we have done  
22 suggested there was no problem with the  
23 transformer.

24 Q. But you didn't test at the

1 transformer?

2 A. We tested near the transformer.

3 MS. DAVID: Thank you.

4 JUDGE RAINEY: If there is nothing  
5 further?

6 MR. KANAGY: Just one more question  
7 to keep this clear, your Honor.

8 \* \* \*

9 R E D I R E C T

10 E X A M I N A T I O N

11 \* \* \*

12 BY MR. KANAGY:

13 Q. Based upon your testing do you  
14 believe that the transformer serving Miss David's  
15 house is providing safe and reasonable service?

16 A. Yes, I do.

17 MR. KANAGY: Thank you.

18 MR. LOCH: Miss Rippke --

19 MR. KANAGY: Your Honor, I don't  
20 believe Mr. Loch can ask questions.  
21 He's holding himself out to be an  
22 engineer and we know he's not a lawyer.

23 JUDGE RAINEY: Why don't you pose  
24 the question for Miss David to ask.

1 MS. DAVID: While he's doing that  
2 I'll ask you a question.

3 \* \* \*

4 R E C R O S S  
5 E X A M I N A T I O N

6 \* \* \*

7 BY MS. DAVID:

8 Q. When you tested the stray voltage  
9 at my house you did it just that one day at one  
10 time, correct?

11 A. I did it on two days.

12 Q. In 2004 and 2006?

13 A. That's correct.

14 Q. But in 2004 you only did it one day  
15 at one time?

16 A. That's correct.

17 Q. In other words at 1:00 p.m. that  
18 was the time, but you didn't do it at 4:00 or 7:00  
19 p.m.?

20 A. That's correct.

21 Q. Just one time. Thank you. Could a  
22 magnetic field reading vary over time?

23 A. Yes.

24 Q. Could a --

1 MR. KANAGY: Your Honor, are you  
2 going to allow additional areas other  
3 than the follow-up questions that we  
4 asked?

5 JUDGE RAINEY: If we can do this  
6 without burdening the time of every one  
7 here and also burdening the record, I  
8 want to be as complete in terms of the  
9 record as I possibly can. So we'll  
10 allow Miss David to ask her questions  
11 and then we'll ask you, Mr. Kanagy, if  
12 you have any additional questions. And  
13 I'm allowing some leeway because she's  
14 not an attorney, and I want to take  
15 that into consideration. We are going  
16 to allow her to ask these additional  
17 questions which theoretically if you  
18 were counsel they should have been  
19 asked before now. We are going to  
20 allow that, we are going to allow you  
21 to ask any Redirect that you want to do  
22 with regard to those questions and then  
23 we're going to positively limit you,  
24 Miss David, to any Recross if I find it

1                   necessary based on any questions  
2                   Mr. Kanagy has asked, and that's going  
3                   to be it. Go ahead.

4 BY MS. DAVID:

5                   Q.        Could a blown fuse on the capacitor  
6 bank cause greater ground current to flow?

7                   A.        Yes.

8                   Q.        Could the magnetic field at the --  
9 or the completed circle -- or could that fuse  
10 cause -- could that blown fuse have caused a  
11 greater magnetic field near my house?

12                  A.        Magnetic field is based on current,  
13 so if it caused more current it could cause more  
14 magnetic field, but it would depend on whether that  
15 current actually flowed to your house, which I  
16 don't believe it would.

17                  Q.        We had discussed the fact that  
18 current can go through soil.

19                  A.        Yes.

20                  Q.        As per the discussion with the  
21 professor at Lafayette College, correct?

22                  A.        We had discussed that current can  
23 go through soil.

24                               MS. DAVID: Thank you.

1 JUDGE RAINEY: Any Redirect,  
2 Mr. Kanagy, based on those questions?

3 MR. KANAGY: Just one question.  
4 Sorry.

5 \* \* \*

6 R E D I R E C T

7 E X A M I N A T I O N

8 \* \* \*

9 BY MR. KANAGY:

10 Q. If there was a blown capacitor fuse  
11 that caused increased EMF or stray voltage would  
12 that be a one-time occasion?

13 A. Yes.

14 MR. KANAGY: No further questions.  
15 Thank you.

16 JUDGE RAINEY: You're done, Miss  
17 David?

18 MS. DAVID: Yes.

19 JUDGE RAINEY: Thank you, Miss  
20 Rippke. You may stand down. We have  
21 admitted those documents into the  
22 record. Let's go off the record.

23 \* \* \*

24 (Whereupon, a brief off-the-record

1 discussion was held.)

2 \* \* \*

3 JUDGE RAINEY: There was a  
4 discussion that was made that was held  
5 off the record with regard to whether  
6 or not we should have briefs in this  
7 particular case. It was noted that we  
8 do have a pro se Complainant in this  
9 case, Miss David, who is not familiar  
10 with drafting or filing briefs. And it  
11 is thought that I have enough evidence  
12 in this case whereby I can render a  
13 written decision in regard to this  
14 matter. And that would be the best use  
15 of time in this particular case at  
16 least, if Miss David submits a brief in  
17 this case only to have it countered by  
18 motions to strike because she has not  
19 complied with Commission rules and  
20 regulations with regard to the written  
21 writing of the brief and the filing of  
22 the brief. So we'll dispense with  
23 briefs in this particular case. The  
24 parties were also informed or it was

1           noted that they will have opportunity  
2           to file what's known as exceptions to  
3           my decision, which, Miss David, as I  
4           stated, would be like an appeal to the  
5           Commission, and you would be provided  
6           with information with regard to when my  
7           decision comes out. When my decision's  
8           issued you'd be provided information  
9           with regard to the period for  
10          exceptions and how you would go about  
11          doing that as well as the other parties  
12          will have that information as well.

13                 So that having been said, is there  
14                 anything else that we need to take up  
15                 here today, Mr. Sherr?

16                         MR. SHERR: No, your Honor.

17                         JUDGE RAINEY: Mr. Danks?

18                         MR. DANKS: Nothing, your Honor.

19                         JUDGE RAINEY: Mr. Kanagy.

20                         MR. KANAGY: No, your Honor.

21                         JUDGE RAINEY: Miss David?

22                         MS. DAVID: Can I just make a  
23                         statement? I just would like to say  
24                         so-called licensed engineers put in

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those pumps that are not insulated and they have no isolators, no clamps and no springs, and licensed engineers did that.

JUDGE RAINEY: Anyone else want to make closing statements in this case? Okay. I will be rendering a written decision with regard to this case and if there is nothing further then this hearing is adjourned. Thank you.

\* \* \*

(Witness excused.)

\* \* \*

(Whereupon, the hearing concluded at 3:00 p.m.)

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## C E R T I F I C A T I O N

I, Karen A. Stevens, a Court Reporter and Notary Public, do hereby certify the foregoing to be a true and accurate transcript of the proceedings in this matter, as transcribed from the stenographic notes taken by me.

Karen A. Stevens

Karen A. Stevens  
Court Reporter  
Notary Public

(The foregoing certification of this transcript does not apply to any reproduction of the same by any means, unless under the direct control and/or supervision of the certifying reporter.)

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C-2005501  
11/30/06, PHILA

**EXHIBIT "1"**

RECORDED IN THE OFFICE FOR RECORDING OF DEEDS IN AND FOR THE COUNTY OF ALLENTOWN, PENNSYLVANIA.  
TO SEE... BOOK VOL. 1508 PAGE 0849 ETC.  
WITNESSED BY HAND AND SEAL OF OFFICE THIS 21TH  
DAY OF JUNE 1993

*Francis A. Liberman*

RECORDER OF DEEDS

# Deed

THOMAS R. LANDIS and  
BERNADETTE M. LANDIS,  
husband and wife

TO

LINDA L. DAVID,  
single

*Dated* June 21, 1993

BRUCE W. WEIDA

ATTORNEY AT LAW  
1023 LANDES STREET  
ALLENTOWN, PA 18102

Commonwealth of Pennsylvania }  
County of } ss..

Recorded on this \_\_\_\_\_ day of \_\_\_\_\_ A. D. 19

in the Recorder's Office of said County  
in DEED Book \_\_\_\_\_, Vol. \_\_\_\_\_, Page \_\_\_\_\_

Given under my hand and seal of the said office the date  
above written.

And the said grantors, do hereby warrant--SPECIALLY----- the property hereby conveyed, unto Linda L. David, single

In Witness Whereof, said grantors ha ve hereunto set their hand s and seals the day and year first above written.

Signed, Sealed and Delivered  
IN THE PRESENCE OF

*[Handwritten signature]*

*[Handwritten signature]* (L.S.)  
Thomas R. Landis  
*[Handwritten signature]* (L.S.)  
Bernadette M. Landis  
\_\_\_\_\_(L.S.)  
\_\_\_\_\_(L.S.)

Commonwealth of Pennsylvania }  
County of LEHIGH } ss.:

On this, the 21ST day of June 19 93 before me a Notary Public the undersigned officer, personally appeared

Thomas R. Landis and Bernadette M. Landis, husband and wife

known to me (or satisfactorily proven) to be the persons whose names are subscribed to the within instrument, and acknowledged that they executed the same for the purpose therein contained.

IN WITNESS WHEREOF, I have hereunto set my hand and notarial seal.

NOTARIAL SEAL  
SUSAN H. FULLAS, Notary Public  
City of Allentown, Lehigh County  
My Commission Expires March 24, 1994

*[Handwritten signature]*  
\_\_\_\_\_  
MY COMMISSION EXPIRES

I Hereby Certify that the precise address of the grantee herein is  
2922 Fairview Street, Allentown, PA 18104

*[Handwritten signature]*

V1508 P0850

MAIL Gross, McKinley, LaBarre + Eaton Atty

03 JUN 23 1993

# This Deed,

Made the 21st day of June

in the year Nineteen hundred and Ninety-Three (1993).

Between THOMAS R. LANDIS and BERNADETTE M. LANDIS, husband and wife, parties of the first part, Grantors

AND

LINDA L. DAVID, single, party of the second part, Grantee

	1250.00	
PAK	1250.00	

06-28-93 NO

STATE STMP 1250.00  
END TRNS 1250.00  
CASHIER10265 15:47T

Witnesseth, that in consideration of -----  
ONE HUNDRED TWENTY-FIVE THOUSAND AND 00/100----- (\$ 125,000.00-) Dollars,  
in hand paid, the receipt whereof is hereby acknowledged, the said grantors do  
hereby grant and convey to the said grantee .

All THAT CERTAIN messuage, tenement and parcel or piece of land being known as Lot No. 7, on a Plan of Section #2, West Hill Terrace as prepared by Fogarasi & Moyer, Inc., Consulting Civil Engineers, Allentown, Pa., and recorded in the Office for the Recording of Deeds in Map Book Vol. 10, page 74, said parcel also being known as 2922 Fairview Street, situate in the Eighteenth Ward of the City of Allentown, County of Lehigh and Commonwealth of Pennsylvania and being more particularly described as follows, to wit:

BEGINNING at a point on the southerly property line of Fairview Street (50.00 feet wide) said point is located on a course N 50° 40' 30" E 107.38 feet from an iron pipe at the intersection of the westerly property line of South 30th Street (50.00 feet wide) with the said southerly property line of Fairview Street; thence (1) from the point of beginning and long the southerly property line of Fairview Street, N 50° 40' 00" E 70.00 feet to a point; thence (2) along Lot #8, S 39° 20' 00" E 119.55 feet to a point; thence (3) along West Hill Terrace, Section #1, S. 52° 47' 15" W 70.05 feet to a point; thence (4) along Lot #6, N 39° 20' 00" W 116.98 feet to the point or place of beginning.

CONTAINING 8,280 square feet.

BEING THE SAME PREMISES which Arthur Lang and Dena Lang, husband and wife, by their deed dated 6-28-84 and recorded 6-29-84 in the Office for the Recording of Deeds for Lehigh County at Deed Book Vol. 1337, page 408, granted and conveyed unto Thomas R. Landis and Bernadette M. Landis, husband and wife, Grantors herein.

SCHEDULE A

Order No	S-1655	Policy No.	0-9981-430637
Date of Policy	June 28, 1993	Amount of Insurance \$	125,000.00
1 Name of Insured	Linda L. David, Single		

2 The estate or interest in the land which is covered by this policy is:

FEE SIMPLE.

3 Title to the estate or interest in the land is vested in:

BY VIRTUE OF A DEED FROM Thomas R. Landis and Bernadette M. Landis, husband and wife, to Linda L. David, single, dated June 21, 1993, recorded June 28, 1993, in the office of the Recorder of Deeds in and for Lehigh County at Allentown, Pennsylvania, in Deed Book Volume 1508, Page 849.

4 The land referred to in this policy is described as follows:

ALL THAT CERTAIN messuage, tenement and parcel or piece of land being known as Lot No. 7, on a Plan of Section #2, West Hill Terrace as prepared by Fogarasi & Moyer, Inc., Consulting Civil Engineers, Allentown, Pennsylvania, as more fully described in the Deed, a copy of which is attached.

## SCHEDULE B

Policy No. O-9981-430637

This policy does not insure against loss or damage (and the company will not pay costs, attorneys' fees or expenses) which arise by reason of

1. Discrepancies or conflicts in boundary lines, easements, encroachments or area content which a satisfactory survey would disclose.
2. Possible additional assessment for taxes or new construction improvements and/or alterations pursuant to provisions of Acts of Assembly relating thereto.
3. Taxes for the year 1993, and thereafter, not yet due and payable.
4. Rights of parties in possession and visible easements on the property.
5. RESTRICTIONS, easements, conditions, covenants, right-of-ways and agreements as recorded in previous documents, deeds, maps and plans.
6. Restrictions as filed in Miscellaneous Volume 158, Page 492, and Deed Book Volume 595, Page 318.
7. Right-of-Way to PP&L as recorded in Misc. Volume 159, Page 232.
8. Right-of-Way to PP&L as recorded in Misc. Volume 238, Page 66.
9. Right-of-Way to PP&L as recorded in Misc. Volume 751, Page 307.
10. Restrictions as filed in Deed Book Volume 570, Page 158.
11. Easements and Restrictions as filed in Map Book Volume 10, Page 74.
12. MORTGAGE from Linda L. David to Keystone Savings Bank, in the amount of \$24,500.00, dated June 16, 1993, recorded June 28, 1993, in the office of the Recorder of Deeds in and for Lehigh County at Allentown, Pennsylvania, in Mortgage Book Volume 1824, Page 76.
13. MORTGAGE from Linda L. David, single, to Keystone Savings Bank, A Pennsylvania Corporation, in the amount of \$100,000.00, dated June 21, 1993, recorded June 28, 1993, in the office of the Recorder of Deeds in and for Lehigh County at Allentown, Pennsylvania, in Mortgage Book Volume 1824, Page 78.

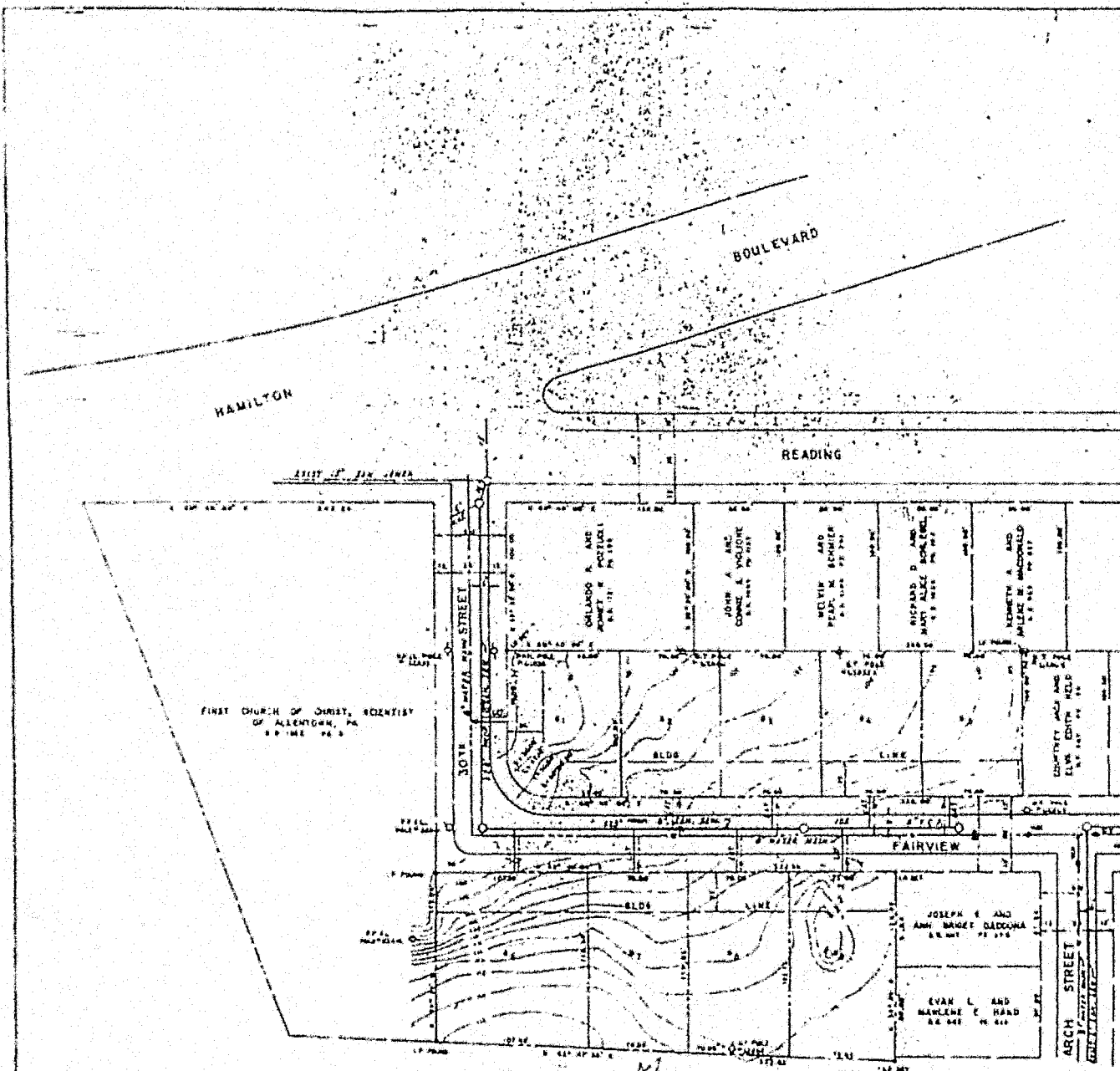
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**EXHIBIT "2"**



IN ACCORDANCE WITH SECTION 6, OF ORDINANCE NO. 11490, I HEREBY CERTIFY THAT THIS FINAL PLAN OF WEST KYLE TERRACE SECTION NO. 2 HAS QUALIFIED UNDER THE REQUIREMENTS OF THE HEALTH CODES.

APPROVED *[Signature]*, 1972  
*[Signature]*  
 HEALTH OFFICER

MAR 30 1972  
 REVIEWED BY THE  
 JOINT PLANNING COMMISSION  
 LEHIGH-NORTHAMPTON COUNTIES  
*[Signature]*  
*[Signature]*

AT THE MEETING OF MARCH 14, 1972  
 THE ALLENTOWN CITY PLANNING COMMISSION,  
 ALLENTOWN, PENNSYLVANIA, FULLY EXAMINED AND  
 APPROVED THE SUBDIVISION PLAN OF WEST KYLE  
 TERRACE SECTION NO. 2, LOCATED IN WARD 10,  
 CITY OF ALLENTOWN, PENNSYLVANIA AS ABOVE.

*[Signature]* CHAIRMAN  
*[Signature]* SECRETARY

PLAT RECORDED IN THE OFFICE OF THE RECORDER OF DEEDS OF LEHIGH COUNTY, PENNSYLVANIA IN MAP BOOK VOLUME 2, PAGE 141 ON THE DAY OF MARCH 31, 1972 BY MARY W. BIRD AND SEAL OF OFFICE THIS DAY OF MARCH 1972.

RECORDED OF DEEDS

APPROVED *[Signature]*  
 1972-72  
 DATE

EVARD

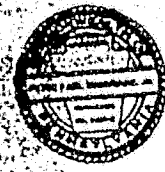


MAR 30 1972  
 REVIEWED BY THE  
 JOINT PLANNING COMMISSION  
 LEHIGH NORTHAMPTON COUNTIES  
*Jones & Snyder*  
*Senior Planner*

APPROVED *Thomas Kander*  
 CITY ENGINEER  
 8189-72  
 DAN

LOW-DENSITY MEDIUM LOW DENSITY RESIDENTIAL  
 NO. OF LOTS: 6  
 MINIMUM LOT SIZE: 7,000 SQ. FT.

I HEREBY CERTIFY THAT THE PLANS SUBMITTED  
 IN DESCRIBED HEREIN ARE TRUE AND CORRECT  
 TO THE ACCURACY REQUIRED BY THE ZONING  
 REGULATION REGULATIONS AND THAT THE  
 PLANNED DEVELOPMENT IS IN ACCORDANCE  
 WITH THE PROVISIONS OF THE ZONING  
 REGULATIONS AND THAT THE SURVEYING DATA  
 IS ACCORDANCE WITH THE SURVEYING DATA  
 SECTION NO. 17000 FOR THE YEAR 1972  
 IN DEER BOOK VOL. 10000  
 DATE: 03/27/72

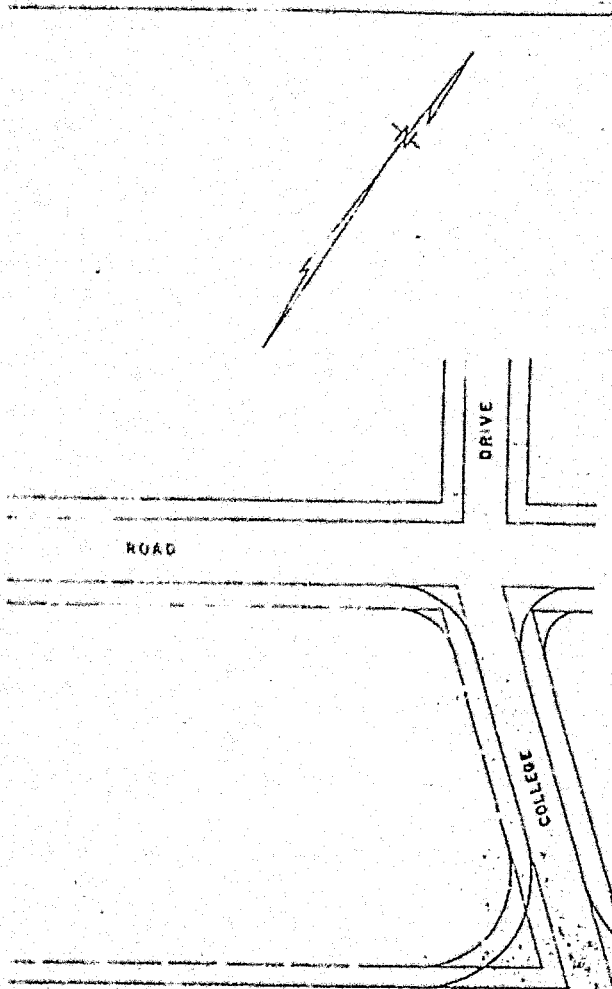


OF THE PL-  
 PENNSYLV-  
 AUX-  
 FOR THIS DAY

ORDER OF DEEDS

REVIEWED

3



WE THE UNDERSIGNED, BEING THE OWNER OF THE LAND HEREIN PLATED, DO HEREBY ADOPT THIS PLAN OF PROPERTY SITUATED IN ALLENTOWN, LEHIGH COUNTY, PENNSYLVANIA (AND DEDICATE TO THE USE OF THE PUBLIC (HEREIN ALL LAND FOR PUBLIC PURPOSES EXCEPT HEREON).

THE FOREGOING ADOPTION (AND DEDICATION) IS MADE BY US WITH THE FULL UNDERSTANDING AND AGREEMENT THAT THE APPROVAL BY THE ALLENTOWN CITY PLANNING COMMISSION (AND THE ATTACHED) WILL REQUIRE FULL AND FAIR NOTICE THIS PLAN IS REQUIRED BY THE COMMISSION OF RECORDS OFFICE OF LEHIGH COUNTY, PENNSYLVANIA WITHIN THIRTY (30) DAYS OF THE DATE OF SAID APPROVAL.

*[Signature]*  
 [Name]  
 [Address]

COMMONWEALTH OF PENNSYLVANIA  
 COUNTY OF LEHIGH  
 REPORT OF A NOTARY PUBLIC IN AND FOR SAID COUNTY AND STATE, PERSONALLY APPEARED THE ABOVE NAMED [Name] AT [Address] ON [Date]

AND ACKNOWLEDGED THE FOREGOING ADOPTION AND DEDICATION AND PLAN TO BE TRUE AND CORRECT AND DURING THE SAME PUBLIC READING AS SET

IN WITNESS WHEREOF I HAVE HEREON SET MY HAND AND NOTORIAL SEAL THIS [Date] 1971.

*[Signature]*  
 [Name]  
 [Address]

MY COMMISSION EXPIRES [Date]

WE THE UNDERSIGNED HEREBY CERTIFY THAT THE FOREGOING PROPERTY SHALL BE SUBJECT TO THE FOLLOWING PROVISIONS WHICH SHALL BE A COVENANT RUNNING WITH THE LAND AND INDIVIDUAL LOTS SUBSEQUENTLY Laid OUT ON THIS PROPERTY SHALL BE SUBJECT TO THE PROVISIONS HEREIN CONTAINED AND SHALL BE BOUND BY THE SAME AS IF THE SAME WERE EXPRESSLY SET FORTH IN THE DEEDS OF SAID LOTS.

DATE [Date] 1971

*[Signature]*  
 [Name]  
 [Address]

THE FOREGOING PROPERTY IS TO BE USED FOR RESIDENTIAL PURPOSES ONLY AND SHALL NOT BE USED FOR ANY OTHER PURPOSES WITHOUT THE WRITTEN CONSENT OF THE CITY OF ALLENTOWN.

*[Signature]*  
 [Name]  
 [Address]

WE HEREBY CERTIFY THAT THE FOREGOING PROPERTY IS TO BE USED FOR RESIDENTIAL PURPOSES ONLY AND SHALL NOT BE USED FOR ANY OTHER PURPOSES WITHOUT THE WRITTEN CONSENT OF THE CITY OF ALLENTOWN.

RESIDENTIAL  
 R1

PLAN AND SURVEY  
 IS AND CORRECT  
 OF THE ALLENTOWN  
 IS THAT THE  
 IS ACCURATELY  
 THE GRADING, I  
 HARVEY HAS PAID  
 A TERRACE  
 LAND WHICH HAS  
 MAP 1111  
 PAGE 1111  
*[Signature]*  
 RECORD SURVEYOR  
 NO. 5221 E.



REVISIONS

WEST HILL TERRACE SECTIONS  
 LOCATED IN  
 WARD 18, CITY OF ALLENTOWN, PENNSYLVANIA

FINAL PLAN

SCALE: 1" = 50'  
 DATE: DEC. 29, 1971

FOGARASI AND MOYER  
 CONSULTING CIVIL ENGINEERS  
 ALLENTOWN, PENNSYLVANIA

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11/30/06, PHILA

EXHIBIT "3-A"

# Reimer Associates, Inc.

PROFESSIONAL ENGINEERS

*Structural - Civil*

October 6, 2003

Ms. Linda David  
2922 Fairview Street  
Allentown, PA 18104

Reference: Structural Inspection

Dear Ms. David:

At your request, on October 1, 2003 and in your presence, I conducted a limited visual structural inspection at your house at 2922 Fairview Street. The attic and the crawl space of the single-story ranch style house were accessed. Cracks in the sheet-rock walls and ceilings of the main floor were found and were reported to have existed for a long time. Seasonal variations in the width of the cracks were also reported.

The house was built in 1970 and you have owned the house since 1993. The house is about 50 feet long and 40 feet wide, and contains a one-car attached garage. The house faces north on Fairview Street.

Two reports were made available for my review. The first is a report of All Phase Building Inspections dated April 8, 1993 and the second is the appraisal report prepared for Keystone Savings Bank as of May 13, 1993 by Raymond C. Geiger Real Estate.

a. All Phase Home Inspections - Building Analysis Report

This report, prepared 10 years ago, generally gives the house a satisfactory rating (indicates Professional/workmanlike construction, very good maintenance, minor settlement, and no termites or wood decay found) with suggested major and minor repairs and a general remark. The major repair recommended was "Repair or Replace Roof". Minor recommended repairs consisted of extending downspouts, sealing and caulking cracks in the driveway paving and concrete pads, removal of insulation over light fixtures, and the installation of GFI's. Under General Remarks, it was noted "Wood supports in crawl space in contact with wood (sic) - should be placed on concrete at least 6" above soil."

I suspect the last comment should have read "in contact with soil" instead of in contact with wood. In this regard, you indicated that work had been done in the crawl space to replace wood beams. There were a number of loose wood posts laying on the ground in the crawl space. These may have been the referenced "wood supports". There was no report on steel splice plates on the main support beams in this report.

b. Raymond C. Geiger Appraisal Report

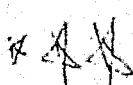
This report lists facts about the property without adding information relative to the structure condition.

The attic was accessed with the pull down stair. The attic was found to be dry and adequately ventilated. The rafters and the roof sheathing do not show any signs of water leakage or condensation. The All Phase report also noted no leaks in the attic. The floor of the attic is covered with boards for storage and walking. Therefore, the center splice of the floor joists was not visible. In a gable roof, the horizontal thrust of the rafters at the eaves needs to be carried by the attic floor joists. The center splice of the joists over the central bearing wall needs

to be strong enough to carry the tension forces involved. The roof on this house is defined as a 'hip roof' but the center portion acts as a gable and the forces need to be carried the same way. Some weakness in this system in this house may account for longitudinal cracks in the ceilings and separations at the wall to ceiling intersections. Reinforcement of the joints in the ceiling joists may help the condition.

The crawl space was accessed through a hatch under the carpet in the floor of the walk-in closet off the master bedroom. The crawl space is dry and the condition of the wood floor joists and the main wood beams is good. The bearing ends of the floor joists and the wood sill plates on the top of the foundation walls are in good condition. No decay or insect infestation was seen in the areas accessed. This appears to be the same as reported by All Phase ten years ago.

It appears the three main beams, running east-west, supporting the floor joists may have been replaced. You indicated you had paid for work of this nature and would search for the itemized invoice. I assume that since this was not mentioned in the All Phase report that the work was done after 1993. The beams consist of 3 - 2x12's spanning over concrete block piers with cast-in-place concrete footings. The 3 - 2x12's are about 14 feet long and are each butt spliced at the same location. The splices are made with 3/16 inch thick steel plates on each side of the beam and are through bolted with 4 - 1/2 inch diameter bolts on each side of the splice. Directly under each of the splices is a concrete block pier and footing, but the splices are not supported on the piers. This lack of support under the splice points creates spans of 14 feet for the beams with the splice at the middle of the span. The maximum bending moment occurs at the middle of the span and is the worst place for a splice of this nature in the members. My calculation indicates that, for a fourteen foot span, the 3 - 2x12's beams are substantially overstressed at the center of the span even discounting the splice occurring at the center of the span.

There are five splice locations in the crawl space as described above. Each of the locations occurs over a pier and at each of the locations the beams are not supported on the piers. I recommend blocking and shims be placed on the top of the piers to properly support the beams at each of the locations. This will restore proper support for the floor and the walls above. I also suspect this repair will do much to reduce the vibrations you report you are feeling in the floor system. As a precaution, the loose wood laying in the crawl space should be removed prior to decay or prior to attracting insects. 

At the rear of the house, the grade in the planting bed is against the aluminum siding. The grade should be kept 6 to 8 inches below the bottom edge of the siding to discourage insect infestation. It is also necessary to slope the grade away from the foundation wall about one foot in the first eight feet away from the walls. No harmful effect of the present grade was seen at this inspection and this is made as a minor recommendation. The All Phase report indicates negative grades within five feet of the foundation.

I find the house to be structurally in good condition. The beams in the basement shall be blocked and shimmed at the five splice locations. At the time this work is done, I suggest the connections of the floor joists in the attic be examined and reinforced if found necessary.

David Residence

Page 3

if you have any questions or need additional information, please feel free to call upon me at any time.

Sincerely yours,  
Reimer Associates, Inc.

Paul H. Reimer, Jr., P.E.

PHR/pr  
david01.wri(1a)

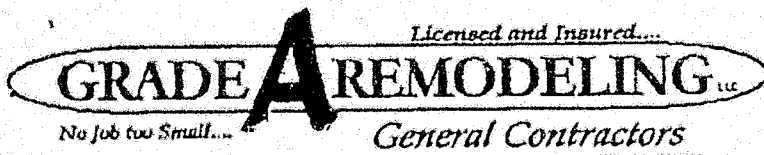
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EXHIBIT "3-B"



Date 10/29/2003

Estimate # 1200

1129 Allen St. Allentown, Pa. 18102  
 610-433-8670 Fax 610-799-5912  
 WWW.GRADEAREMODELING.COM

**Submitted To :**

MS LINDA DAVID  
 2922 WEST FAIRVIEW ST.  
 ALLENTOWN, PA 18103

**Work to be completed as follows :**

- ATTIC
- INSTALL 2 X 4 CONTINUAL KNEE-WALLS ON BOTH SIDES OF ROOF AREA
- WALLS TO BE PLACED MID-SPAN BETWEEN EXTERIOR WALL AND RIDGE BEAM TO DISTRIBUTE LOAD ON RAFTERS
- COLLAR TIES ARE TO BE INSTALLED ( 2 X 6) ON MAIN RAFTERS TO DECREASE POSSIBILITY OF RAFTERS SPREADING AND UNDERLOAD
- EXISTING HIP & VALLEY JOINTS ARE TO BE ADEQUATELY SUPPORTED TO FLOOR JOISTS
- CRAWL SPACE
- EXISTING VERTICAL SUPPORTS BELOW BEAM WHICH ARE NOT CURRENTLY SUPPORTING BEAM ARE TO HAVE BLOCKING INSTALLED TO ADD SUPPORT TO BEAM AREAS
- BEAM AREAS WHERE POCKETED INTO FOUNDATION WALLS TO BE SUPPORTED TO EXISTING FOOTERS
- ALL WOOD DEBRIS IN CRAWL-SPACE AREA IS TO BE REMOVED AND DISPOSED OF

CUSTOMERS PHONE # 610-740-0637

IF THIS PROPOSAL IS ACCEPTABLE PLEASE SIGN ONE COPY & EITHER FAX TO 610 799-5912 OR YOU CAN MAIL A SIGNED COPY IN THE ENVELOPE PROVIDED. ANY QUESTIONS PLEASE CALL OUR OFFICE AT 610 433-8670. THANK YOU !

All Materials are guaranteed to be as specified & the above work to be completed in a substantial workman-like manner. Any deviations from above specified work will be executed only by Addendum to original estimate. All agreements contingent upon accidents or delays beyond our control. This estimate may be withdrawn by us if not accepted within 90 days

<b>Total</b>	\$2,950.00
	Terms 1/2 Start 1/2 Completion

Signature & Date



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C-20055501  
11/30/06, PHILA

EXHIBIT "3-C"

10/29/04

received  
11/04

Louisa,

This is the blasting inspector's report - DEP. A notice of violation was sent, although damages there are not from blasting. Damages are listed - which I felt was important. He just neglected to note cracks in bricks out front. When he was here, he said it was new!

Hope to someone from PEACE  
Will have a seismograph  
test done here! Most likely  
next week. Rights in here was  
violated!  
Linda David



**COMPLAINT INVESTIGATION DESCRIPTION**

October 13, 2004

RE: Complaint #185302, (Non-Mining), Ed Wean Drilling & Blasting, Cedar Point Housing Operation, BAP# 48034027, South Whitehall Township, Lehigh County.

Complainant: Linda David (CONFIDENTIAL)

The following are my findings for the above referenced damage complaint. This complaint was called into the Pottsville District Office on 6/21/04 describing heavy blasting at the nearby Cedar Point Housing site that may have caused alleged damage to her home.

This response is in accordance with the "Blasting Complaint Protocol" effective September 18, 1997.

**Investigation:**

(Step 1) Review of Shot Records:

Investigation conducted on 8/20/04 on-site. Shot reports and seismic results of Ed Wean Drilling & Blasting (permit applicant & contracted blasting company) for this site were reviewed and inspected. Records indicate that only one blast was fired on this site, which occurred on 1/20/04. Ed Wean informed me that they conducted blasting for only one foundation at this site. While on site no recent blasting was evident and appeared to have been very little blasting conducted. The blast of 1/20/04 @ 1:43PM consisted of the following.

- 100 holes @ 3 ½ " dia.
- 5 X 5' burden & spacing
- 6'-6 ½' (avg stemming)
- 9' deep
- Max. holes/delay = 6
- Max. lbs/delay = 6 holes X 10.5 lb. = 63 lbs.
- Distance to nearest structure = 261'
- Distance to complainants' home = 1500' (+ or -)
- Scaled distance to nearest structure = 31.62
- Scaled distance to complainants' home = 188.98
- Total lbs. of explosives used = 996.94 lbs.
- RI 8507 Worst Case Prediction Limit @ Complainants' - PPV = 0.12
- Seismic results @ nearest structure -- PPV = 0.10 & dB = 119

## COMPLAINT INVESTIGATION DESCRIPTION

October 13, 2004

### Findings for (Step 1):

All records for these blasts were complete, however it was discovered that Ed Wean Drilling & Blasting exceeded their maximum amount of explosives per delay period and number of holes/decks per delay period as stated in their approved blasting activity permit.

The recorded ground vibrations satisfy the Variable Particle Velocity vs Frequency Limits recommended by the U.S. B.M. Report RI-8507 (Nov, 1980).

The recorded air-borne effects satisfy the recommended levels set forth in the U.S. B.M. Report RI-8485 (Nov., 1980).

---

### (Step 2) Evaluation of Damage:

Damage viewed at home with the complainant. Damage viewed was the following:

- Living room has horizontal cracks off the upper right hand corner of front window.
- Living room west wall has horizontal crack @ the wall/ceiling seam. (plaster on lathe)
- Vertical crack across living room/hallway entry ceiling. Crack is parallel to a repaired crack. \*
- Vertical crack in east wall at doorway into TV room from the living room. Also a repaired area beginning to buckle. \*
- Small hairline crack in TV room ceiling & a buckle near the center of the ceiling.
- Laundry room has a crack @ wall/ceiling seam, holes @ outside corner & inside corner at the wall/ceiling points. Walls also have nail pops beginning to show. \*
- Radon Evac system is operating more often.
- Nail pops in kitchen & hallway ceilings.
- Hallway ceiling has multiple cracks near the bedroom doors.
- Spare bedroom has a vertical crack above the window.
- 3<sup>rd</sup> bedroom has vertical & horizontal cracks @ the entry & closet doors. Crack @ ceiling/wall seam above the closet door and cracks inside the closet in the ceiling & walls.
- Multiple cracks in master bathroom ceiling.
- Master bedroom has a crack @ entry in ceiling and molding beginning to pull away from the ceiling. Also cracks @ upper right corner of closet corner & bathroom door. Cracks & Nail pops are also in the ceiling. \*
- Tile in corner of the master bedroom bathroom is cracked.
- Cracks in master bedroom closet @ the window and the upper corners of the door.

Complainant's records indicate that the vibrations that she is feeling are in the early morning. No blasting was conducted at the dates and times the complainant has recorded.

## COMPLAINT INVESTIGATION DESCRIPTION

October 13, 2004

### *Findings for (Step 2)*

The above described damage was not characteristic of vibration damage. Damage viewed at the home during this investigation was not characteristic of blasting damage in accordance with the support literature for the "Blasting Complaint Protocol" that allows guidance in determining blasting damage.

When determining the potential for damage to structures from ground vibration a determination must be made of how hard the structure is shaken. Ground vibration is measured in peak particle velocity (PPV) and the unit of measure is inches per second. U. S. Bureau of Mines RI 8507 Structure Response and Damage Produced by Ground Vibration From Surface Mining, 1980, is the basis for state and federal blasting regulations. According to Vibrations From Blasting, Siskind 2000, the limits in RI 8507 remain the most restrictive criteria in existence that are based upon measured structural responses and observations of cracking correlated to specific vibration events. The RI 8507 limits provide a guaranteed safe level to guide blasting practices and limits suitable for regulations. They account for the widest possible range and worst-case conditions for residential structures.

It was explained to the complainant that vibration damage would result in sets of diagonal fine hairline cracks @ about 45 degrees to the horizontal in the upper parts of the structure. These cracks may appear near the weak points of the walls, as near center of the wall. This cracking would be more evident in the portions of the house closer to the blasts. It was also explained that damage from excessive airblast would first be seen in broken windows on the side of the house in the direction of the blast. It was also explained that damage would occur within seconds of the blast and not show up at a later time. No such damage was alleged.

In conclusion, based on the information available during this investigation and vibrations recorded on the seismograph @ a distance much closer to the blast than the complainants' home, it is this inspectors opinion that vibration from blasting @ the nearby Cedar Point Housing site is not the cause of the alleged damage to the complainants' home.

### Penalties Cited:

The following "Notice of Violations" was cited to Ed Wean Drilling & Blasting and Steve Gondek, Jr., blaster in charge for Ed Wean Drilling & Blasting:

- 1 25 PA Code 211.121(d) - Not complying with their approved blasting activity permit.

Investigation completed as per the date of this report.

COMPLAINT INVESTIGATION DESCRIPTION

October 13, 2004



---

Ross E. Klock  
Blasting/Explosive Inspector

cc: Linda David/  
Ed Wean Drilling & Blasting (112 Ravine Rd., Stewartsville, PA 08886)  
D. Perkins, CS

References:

1. "Blasting Damage and Other Structural Cracking" guide for adjusters and engineers, American Insurance Services Group, Inc., Copyright © 1972, p.64.
2. "Vibrations From Blasting", DESA Dr-31, Special edit. for PA DEP, August 5, 1997, David E. Siskind, p.20.
3. RI 8507, Structural Response and Damage Produced by Ground Vibration From Surface Mine Blasting, Bureau of Mines Report, U. S. Dept. of Interior, 1980.
4. "Diagnosing and Repairing i House Structure Problems", Edgar O. Seaquist, Jr., Ph.D., PE, Copyright © 1980.
5. "The Home Reference Book" The Encyclopedia of Homes, Carson, Dunlop & Associates Limited, Copyright 1988-1997, 13<sup>th</sup> Edition.

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**EXHIBIT "3-D"**

# **Environmental Assessment**

From a

## **Bau-Biologie Perspective**

At

2922 W. Fairview St.  
Allentown PA 18103-2818

Performed for:

Ms. Linda David

Work performed on premises  
28 March 2004

By

Sal La Duca  
BS, BB/BBEL, CIE

**Environmental Assay Inc.**

792 Green St.  
Phillipsburg NJ 08865

[www.emfrelief.com](http://www.emfrelief.com)

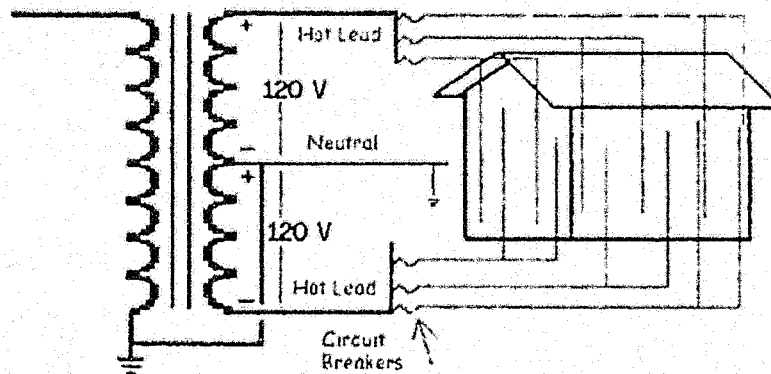
## Executive Summary

Ms. David has noted cracks on her sheetrock walls, dust emissions from her Heating Ventilation and Air Conditioning (HVAC) unit, and has been having difficulty sleeping because of perceptions she feels are associated with a water pumping station only a few hundred feet away. She requested a visit from the author.

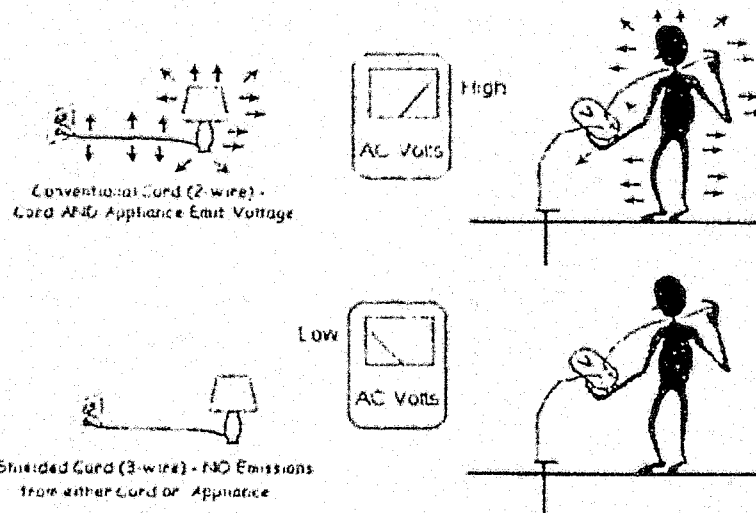
## Findings

The home Ms. David lives in is conventionally built. A conventional design, however, allows for various conditions to exist that can irritate sensitive individuals.

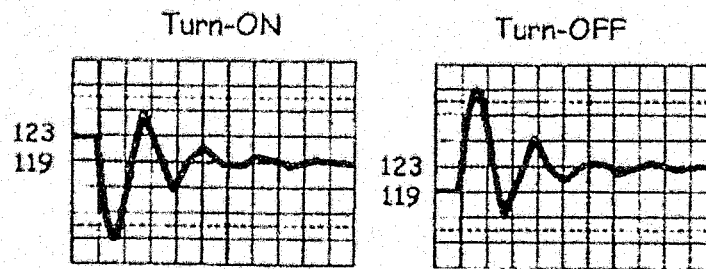
1) The home's electrical system is comprised of Romex wiring throughout. This type of wire allows its Voltage to permeate beyond the insulation and through wall, floor, and ceiling boundaries to establish an electrified birdcage effect.



2) Light and appliance fixtures are wired with conventional cordage, further strengthening the Voltage environment.



3) The Electric Heat Source ( a Heat Coil within the HVAC unit) produced **Voltage Pulsations** that are propagated by the voltage environment. During turn ON and OFF instances especially, the supply voltage, and the resultant emitted voltage that can be measured throughout the structure, takes a step jump down or up, with associated ringing. This can be compared to use of a Transcutaneous Electrical Nerve Stimulator (TENS) instrument, although over the entire surface of the body. The transients are shown simplified below.



4) There was a customary tie between the Electric Ground/Neutral and the Metallic Water Pipe that allowed currents to flow, creating a Magnetic field along portions of the side (adjacent to the Electrical Distribution Panel) and the front of the house. The field varied from 0.2 to 1.4 Amps during observation.

5) There was a background Magnetic Field produced from the Electrical Primary (located on a hill behind the house), identified by a whole-house directional field of 1.5 mG (milliGauss), which also feeds the water pumps located down the street. This field pulsates in similar fashion to the voltage pulsations from the HVAC heater.

6) The HVAC unit is located in the crawlspace. It is equipped with many supply and returns. There was no main filter installed in the suction of the machine.

7) The HVAC humidifier tank was totally dry, indicating a previous failure.

8) The home is equipped with wall-to-wall carpeting throughout.

9) Ms. David has a cat, and her vacuum cleaner is not High Efficiency Particulate Air (HEPA) equipped.

## Discussion and Recommendations

1, 2, & 3) The wiring installed throughout is Romex. This type of wire allows voltage to permeate beyond the plastic insulating jacket. Because the Voltage is Alternating (that is, changing with time), it will induce voltages on conductive objects or creatures within its region of influence (or Field extent), causing a portion to be echoed back by the body the influence is on.

suction header. The Main Filter should be Pleated Media to ensure good dirt stopping ability.

7) The HVAC Humidifier was totally dry and appeared to have been so for some time. Proper operation might have reduced the ability of dust deposits from becoming liberated, but it would have simply delayed the evident emergence of the associated problems. It should be repaired and checked annually. A Structural Engineer investigated the cracks on the sheetrock walls and determined that construction defects during construction might have been a cause for this. Repairs were suggested and implemented. However, this author suspects that the cracks on the sheetrock walls may have been exacerbated by the extreme dryout during winter due to Humidifier non-functioning.

*was repaired*

8) Humans shed skin cells regularly. Animals shed dander regularly. This can provide for a buildup of organic debris within the carpeting as installed. While Cat Dander is itself a strong allergen, an enhanced organic debris base can provide for a significant buildup of Dust Mites and their debris. This debris is a potent allergen that can provide symptoms of respiratory irritation or asthmatic character. A HEPA equipped vacuum will remove dirt down to 0.3 microns which includes all pollen, all mold spores, dust mite debris, many bacteria, and other particles within the same size ranges. A conventional vacuum cleaner will trap dust that is 5-10 microns or greater in size, give the appearance of cleanliness, but spread the finer dust around evenly. One telltale sign is a peculiar smell of "old dust" when using a conventional vacuum cleaner. That is because the user is inhaling a portion of the finer dust that is made airborne. It is recommended that a HEPA vacuum cleaner be purchased and a "spring cleaning" be done throughout. This will also trap much of the dust already liberated by the HVAC unit.

9) The access hatch for the crawlspace should be equipped with handles for easy removal, the carpet above should be cut to the dimensions of the hatch, and the crawlspace equipped with substantial lighting to ease the task of regular maintenance, that should be considered a must for proper health care.

#### Resources:

**THE ELECTRICAL SENSITIVITY HANDBOOK: How Electromagnetic Fields (EMFs) Are Making People Sick** – Lucinda Grant – Weldon Publishing, P.O. Box 4146, Prescott AZ 86302 - 1995, ISBN 0-9635407-2-6

**ENERGY MEDICINE: The Scientific Basis** - James L. Oschman, Candace Pert - Publisher: Churchill Livingstone, Inc., - 2000, ISBN: 0-443-06261-7.

**CROSS CURRENTS, The Perils of Electropollution, The Promise of Electromedicine** - Robert O. Becker M.D., - Publisher: James P. Tarcher Inc. 1990, ISBN 0-87477-609-0.

# Environmental Assay Inc.

Wide Spectrum Environmental Services

Federal Tax ID: 22-3305949

5 April 2004

Invoice 28032004

**Linda David**

**Service date: 28 March 2004**

## Travel

1 hour @ \$30/hour \$30

## Services

3 hours @ \$90/hour \$270

## Equipment

GB Instruments Non-contact Voltage Probe \$20

---

Total \$320

Check (# 110, 3-28-2004) \$300

Cash \$20

---

Balance Due - 0 -

**Thank you for payment**

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**EXHIBIT "3-E"**



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION III  
1650 Arch Street  
Philadelphia, Pennsylvania 19103-2029

NOV 22 2004

The Honorable Rick Santorum  
United States Senator  
5802 Federal Office Building  
504 West Hamilton Street  
Allentown, Pennsylvania 18105

Dear Senator Santorum:

Thank you for your October 6, 2004 letter on behalf of your constituent, Ms. Linda L. David, regarding her concerns that a nearby water pumping station owned by South Whitehall Township is producing vibrations and stray electrical currents that are impacting her dwelling and her health in Allentown, Pennsylvania.

The U.S. Environmental Protection Agency (EPA) does not have legislative authority to address environmental problems in residential buildings. However, in order to provide as much assistance as possible for this complex situation, building science experts from EPA's Region III office visited Ms. David's home on June 2, 2004. A synopsis of their findings at the time of this visit showed the following: very low levels of stray electrical current, except near the transformer pole that services the dwelling; barely detectable vibrations were observed in the home with one pump at the station running, some water infiltration problems in the crawl space of the dwelling; and light mold growth and excess dirt and mold in the ventilation ducts. In total, we considered the impacts observed from the pump to be minimal.

I would like to show my continued support by offering the assistance of the Region's building science expert, Mr. Francis Dougherty as a resource by telephone. If you have any questions, please feel free to contact me or have your staff contact Ms. Stacie Driscoll, Acting Pennsylvania Liaison Officer, at 215-814-3368.

Sincerely,

A handwritten signature in cursive script that reads "Donald S. Welsh".

Donald S. Welsh  
Regional Administrator



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EXHIBIT "3-F"

W.S. REICHERBACH & SON, INC.  
 1313 NO. PLYMOUTH STREET INC. BOX 669  
 ALLENTOWN, PA 18105-0669  
 PHONE: (610) 434-7234

Plus One FINANCE CHARGE is  
 Periodic Rate of 1.2% per month  
 (corresponding ANNUAL  
 PERCENTAGE RATE 18%)

No Late Fee FINANCE CHARGE  
 added if New Balance paid within  
 30 days of Closing Date

\*\*\* SERVICE INVOICE \*\*\*143260 \*\*\*

LINDA DAVIES  
 2922 W FAIRVIEW ST  
 ALLENTOWN, PA 18103

ACCT# 140430  
 6/17/04

NOTICE SEE REVERSE SIDE FOR IMPORTANT INFORMATION

QUANTITY	DESCRIPTION	AMOUNT
1.000	DUCT CLEANING	750.00
	DOWN PU \$200.00 6/9/04	
	TOTAL PARTS	750.00
	TOTAL LABOR	0.00
	<b>TOTAL CHARGE FOR INVOICE #143260</b>	<b>750.00</b>

SITE 2922 W FAIRVIEW ST/ALLENTOWN, PA  
 CALL REASONS: FOLLOW UP  
 WORK PERFORMED: CLEANED DUCT WORK

*fil. - Quinn 6/20/04*

*Didn't clean air @ all.*

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EXHIBIT "3-G"



## AIR CARE & RESTORATION CO., INC.

AIR PURIFICATION AND RESTORATION SPECIALISTS

Linda David  
2922 W Fairview Street  
Allentown, PA 18103

April 12, 2004

On March 24, 2004 Keith Roe, CIE, CMC, visited this home to perform three separate testing protocols.

### Sample 1

Using a clear tape lift technique several "dusty" locations were sampled for particulate identification using PLM (polarized light microscopy). SEM (scanning electron microscopy) and EDX (energy dispersive x-ray) by EMSL Laboratory at Westmont, NJ. The lab report (Page 2 of 2) for sample 1, found the following particles in order of % to total sample.

Processed cellulose (paper)	20%
Quartz	20%
Starch	10%
Calcite (concrete, mortar, etc.)	10%
Mica (silicates, sand)	7%
Skin cells	7%
Inert/organics	2%
Clay	7%
Mold Parts	2%
Pollen less than	1%
Paper pulp less than	1%
Diatoms (planktonic algae) less than	1%
Unidentified	4%

### Overview:

Particles commonly sourcing from the outdoors, ground or crawl space structural environment make up approximately 44% of the dust sample.

44%

1510 GARY STREET, BETHLEHEM, PA 18018  
(610) 865-8090 • FAX: (610) 865-2191  
WWW.AIRCAREONLINE.COM  
EMAIL: ACR:NCI@PRODIGY.NET

This would indicate that these particles are potentially sourcing from the crawl space via the unsealed and open ductwork found in the crawl space, as you suspect

### Recommendations

- 1.) Sealing the ductwork followed by a professional air duct system cleaning and sanitation procedure should reduce the build up of particles in the system.
- 2.) The HVAC system filter should be upgraded to at least a MERV 11 arrestance (1" pleated filter with a MERV 11 rating) is sufficient.
- 3.) The crawl space floor should be covered with a 6 mil plastic vapor barrier and sealed around the edges of the foundation.

Cost of professional services

\$1,850 00

### Sample 2 – Laboratory Report

The second dust sample was analyzed for *phosphorus* content. None was detected.

### Sample 3 – Laboratory Report

Using a NIOSH 1003 Collection Method, this air sample was analyzed for *carbon tetrachloride* content. None was detected.

Please contact me with any questions you may have.

Report respectfully submitted by:  
Keith Roe,  
CIE, CMR, CMRS, CMC

# AIR CARE & RESTORATION CO., INC.

1510 Gary Street  
Bethlehem, PA 18018

- INDOOR AIR QUALITY TESTING
- HVAC SYSTEM CLEANING & SANITATION
- FLUE RELINING, CLEANING & REPAIR
- I.A.Q. SITE INSPECTIONS

- I.A.Q. REMEDIATION SPECIALISTS
- AIR PURIFICATION EQUIPMENT & FILTERS
- MOLD MILDEW & BACTERIAL ABATEMENT
- PROJECT MANAGEMENT

Toll Free: 800-859-3828  
FAX (610) 865-2191  
www.aircareonline.com

## CUSTOMER INFORMATION

Name Linda Davis (Dev) \_\_\_\_\_ State PA  
Address 2422 W FOURTH ST City ALLENTOWN Zip 18103  
Phone #: Home (610) 740-1033 Work ( ) \_\_\_\_\_ Appt. Time 3:12  
Contact Person: \_\_\_\_\_ Contact # \_\_\_\_\_ Appt. Date 3/19/07

## DUCT CLEANING

System Cleaning: System 1 at \$ \_\_\_\_\_ \$ \_\_\_\_\_  
(with 10 registers) System 2 at \$ \_\_\_\_\_ \$ \_\_\_\_\_  
Additional Registers: System 1 \_\_\_\_\_ at \$ \_\_\_\_\_ ea. \$ \_\_\_\_\_  
System 2 \_\_\_\_\_ at \$ \_\_\_\_\_ ea. \$ \_\_\_\_\_  
Sanitation Treatment # \_\_\_\_\_ at \$ \_\_\_\_\_ ea. \$ \_\_\_\_\_  
Coil Cleaning \_\_\_\_\_ at \$ \_\_\_\_\_ ea. \$ \_\_\_\_\_

## FLUE / CHIMNEY CLEANING

Fireplace Flue # \_\_\_\_\_ at \$ \_\_\_\_\_ ea. \$ \_\_\_\_\_  
Furnace Flue: # \_\_\_\_\_ at \$ \_\_\_\_\_ ea. \$ \_\_\_\_\_  
Chimney Repairs: \_\_\_\_\_ \$ \_\_\_\_\_  
Chimney Inspection \_\_\_\_\_ \$ \_\_\_\_\_

## DRYER VENTS

Number of Vents # \_\_\_\_\_ at \$ \_\_\_\_\_ \$ \_\_\_\_\_  
Vent Repair/Installation: \_\_\_\_\_ \$ \_\_\_\_\_

## ADDITIONAL SERVICES / PRODUCTS

(1) IAQ inspection \$ ~~150.00~~ 75.00  
(1) tape sample \$ 95.00  
\$ 170.00

## ELECTROSTATIC FILTERS

Size \_\_\_\_\_ Quantity \_\_\_\_\_ \$ \_\_\_\_\_  
Sizes \_\_\_\_\_ Quantity \_\_\_\_\_ \$ \_\_\_\_\_

Additional recommendations  
Will get back on air test  
to measure carbon

SUBTOTAL \$ \_\_\_\_\_  
SALES TAX \$ \_\_\_\_\_  
TOTAL \$ 170.00  
Date Paid \_\_\_\_\_ Check # 4188 Amount Paid \$ 170.00  
VISA / MasterCard # \_\_\_\_\_ Expiration Date \_\_\_\_\_

Tech. name PHS - Kent Strickland / phosphorus  
Full name on card \_\_\_\_\_  
Customer Signature \_\_\_\_\_ Date \_\_\_\_\_

# AIR CARE & RESTORATION CO., INC.

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- FLUE RELINING, CLEANING & REPAIR
- I.A.Q. SITE INSPECTIONS

- I.A.Q. REMEDIATION SPECIALISTS
- AIR PURIFICATION EQUIPMENT & FILTERS
- MOLD MILDEW & BACTERIAL ABATEMENT
- PROJECT MANAGEMENT

## CUSTOMER INFORMATION

Name Linda David (Dev) \_\_\_\_\_ State PA  
 Address 2122 W. Full View St City Allentown Zip 18103  
 Phone #: Home (610) 740-0637 Work ( ) \_\_\_\_\_ Appt. Time \_\_\_\_\_  
 Contact Person: \_\_\_\_\_ Contact # \_\_\_\_\_ Appt. Date 8.30.11

Week 3/24/04

## DUCT CLEANING

System Cleaning: System 1 at \$ \_\_\_\_\_ \$ \_\_\_\_\_  
 (with 10 registers) System 2 at \$ \_\_\_\_\_ \$ \_\_\_\_\_  
 Additional Registers: System 1 \_\_\_\_\_ at \$ \_\_\_\_\_ ea. \$ \_\_\_\_\_  
 System 2 \_\_\_\_\_ at \$ \_\_\_\_\_ ea. \$ \_\_\_\_\_  
 Sanitation Treatment # \_\_\_\_\_ at \$ \_\_\_\_\_ ea. \$ \_\_\_\_\_  
 Coil Cleaning \_\_\_\_\_ at \$ \_\_\_\_\_ ea. \$ \_\_\_\_\_

## FLUE / CHIMNEY CLEANING

Fireplace Flue # \_\_\_\_\_ at \$ \_\_\_\_\_ ea. \$ \_\_\_\_\_  
 Furnace Flue: # \_\_\_\_\_ at \$ \_\_\_\_\_ ea. \$ \_\_\_\_\_  
 Chimney Repairs: \_\_\_\_\_ \$ \_\_\_\_\_  
 Chimney Inspection \_\_\_\_\_ \$ \_\_\_\_\_

## DRYER VENTS

Number of Vents: # \_\_\_\_\_ at \$ \_\_\_\_\_ \$ \_\_\_\_\_  
 Vent Repair/Installation: \_\_\_\_\_ \$ \_\_\_\_\_

## ADDITIONAL SERVICES / PRODUCTS

(2) Mason 1003 air test w/ lead report \$ 100.00  
 (1) Duct sample for phos. phorons analysis \$ 100.00  
 (1) \_\_\_\_\_ \$ \_\_\_\_\_

## ELECTROSTATIC FILTERS

Size \_\_\_\_\_ Quantity \_\_\_\_\_ \$ \_\_\_\_\_  
 Sizes \_\_\_\_\_ Quantity \_\_\_\_\_ \$ \_\_\_\_\_

Additional recommendations  
inspect and clean  
Kurt For

SUBTOTAL \$ \_\_\_\_\_  
 SALES TAX \$ \_\_\_\_\_  
 TOTAL \$ \_\_\_\_\_

Tech. name Kurt For  
 Date Paid 8/11/11 Check # 117 Amount Paid \$ \_\_\_\_\_  
 VISA / MasterCard # \_\_\_\_\_ Expiration Date \_\_\_\_\_  
 Full name on card \_\_\_\_\_  
 Customer Signature \_\_\_\_\_ Date \_\_\_\_\_

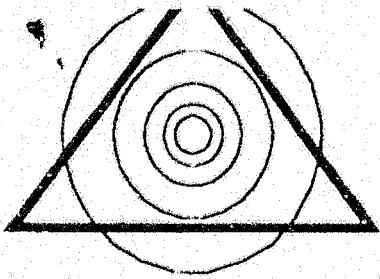
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**EXHIBIT "3-H"**



**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-TRNTYEE@BELLATLANTIC.NET Http://www.TRINITYASSOC**

*FOR*

**LINDA DAVID**

**ALLENTOWN, PA**

Project Engineering Survey

Date: February 18, 2004

Job #: T-5445

*Alan A. Loch*  
Alan A. Loch  
Project Engineer



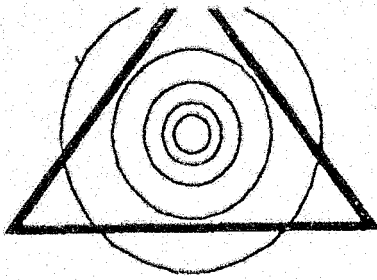
TABLE OF CONTENTS  
ENGINEERING SURVEY  
LINDA DAVID RESIDENCE  
FEBRUARY 18, 2004

Special Comments

Linda David Residence, 2922 W Fairview  
Allentown, PA 18103

Problem #

Possible 600 gpm Pumps Not Sound Isolated Like Pictured Pump	1
Possible 600 gpm Pumps Not Sound Isolated Like Pictured Pump	2
Possible 600 gpm Pumps Not Sound Isolated Like Pictured Pump	3
Cracks in Ceiling and Walls	4
Additional Cracks in Ceiling and Walls	5
Additional Cracks in Ceiling and Walls	6
Additional Cracks in Ceiling and Walls	7
Additional Cracks in Ceiling and Walls	8



**TRINITY ASSOCIATES, INC.**

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

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

**(610) 876-6428**

**FAX (610) 876-7178**

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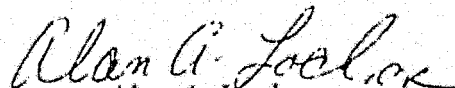
**LINDA DAVID RESIDENCE  
ENGINEERING SURVEY  
SPECIAL COMMENTS**

Because of damage to the house, investigate whether electrical motor driven pumps from water pumping station are properly vibration isolated from foundation. See pages 1, 2 & 3 of another customers properly vibration isolated pump. See pages 4, 5, 6, 7 & 8

Note the 15 different cracks in the walls at the house. Three thousand dollars worth of structural work has already been done to the house, but damage could be continuing.

Please call if you have any questions.

Sincerely yours,

  
Alan A. Loch  
Electrical Engineer



**INFRARED  
PREVENTIVE MAINTENANCE SURVEY**

*For*  
**LINDA DAVID**  
2922 WEST FAIRVIEW, ALLENTOWN, PA  
Problem #: 1                      DATE: February 18, 2004

MVC # 129                      IR #:  
LOCATION  
Linda David's Home at 2922 West Fairview, Allentown,  
PA

EQUIPMENT  
Possible 600 GPM Pumps-Not Sound Isolated Like  
Pictured Pump

PROBLEM  
Note, rubber vibration isolation joints.

COMMENTS / RECOMMENDATION  
Check South Whitehali Twp. Pumps for vibration, isolation.

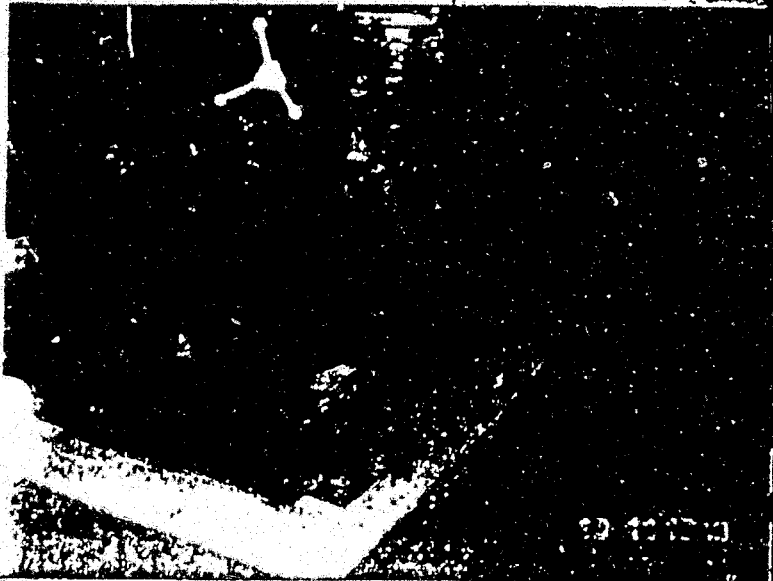
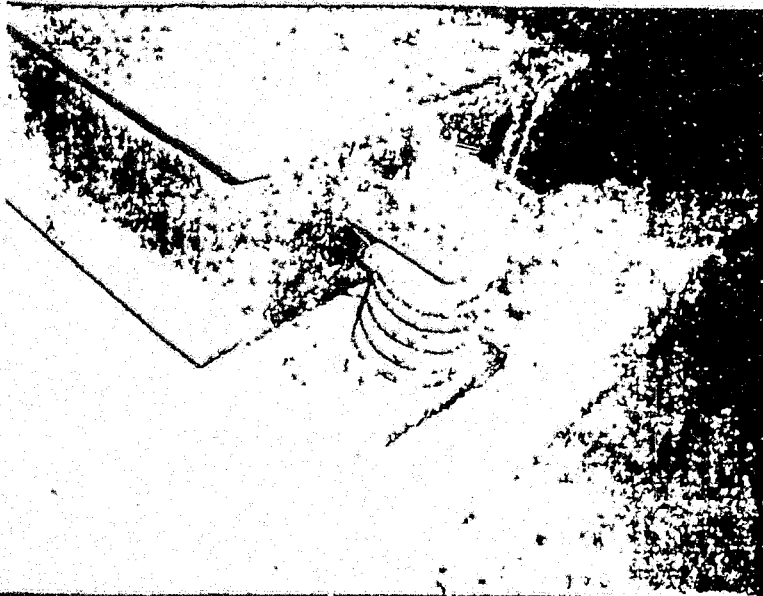
**MAINTENANCE HISTORY**

DATE: \_\_\_\_\_ INITIALS \_\_\_\_\_  
ACTION TAKEN: \_\_\_\_\_

DATE: \_\_\_\_\_ INITIALS \_\_\_\_\_  
ACTION TAKEN: \_\_\_\_\_

DATE: \_\_\_\_\_ INITIALS \_\_\_\_\_  
ACTION TAKEN: \_\_\_\_\_

RESERVED FOR THERMOGRAM  
AFTER COMPONENT REPAIR



**INFRARED  
PREVENTIVE MAINTENANCE SURVEY**

*For*  
**LINDA DAVID**  
2922 WEST FAIRVIEW, ALLENTOWN, PA  
Problem #: 2                      DATE: February 18, 2004

MVC #: 131                      IR #:  
**LOCATION**  
Linda David's Home at 2922 West Fairview, Allentown,  
PA

**EQUIPMENT**  
Possible 600 GPM Pumps-Not Sound Isolated Like  
Pictured Pump

**PROBLEM**  
Note, vibration isolated foundation for pumps.

**COMMENTS / RECOMMENDATION**  
Check South Whitehall Twp. Pumps for vibration, isolation

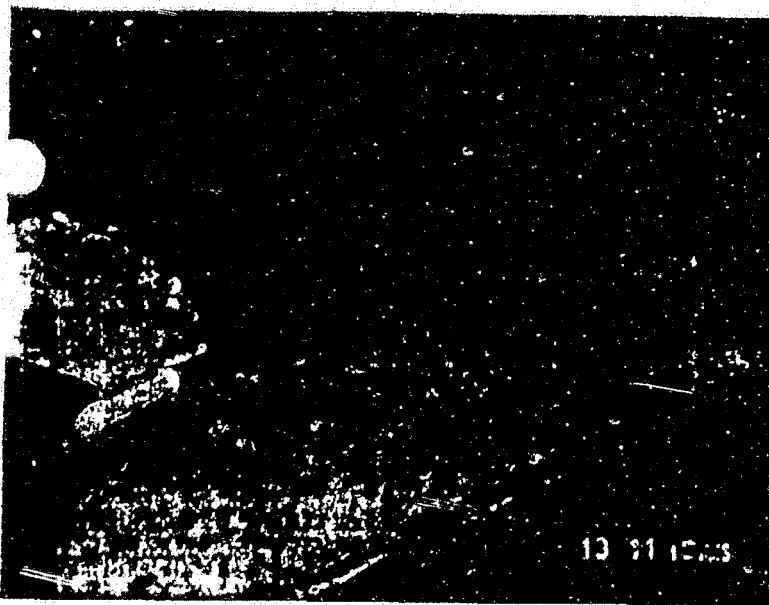
**MAINTENANCE HISTORY**

DATE: \_\_\_\_\_ INITIALS \_\_\_\_\_  
ACTION TAKEN: \_\_\_\_\_

DATE \_\_\_\_\_ INITIALS \_\_\_\_\_  
ACTION TAKEN: \_\_\_\_\_

DATE \_\_\_\_\_ INITIALS \_\_\_\_\_  
ACTION TAKEN: \_\_\_\_\_

RESERVED FOR THERMOGRAM  
AFTER COMPONENT REPAIR



**INFRARED  
PREVENTIVE MAINTENANCE SURVEY**

For  
**LINDA DAVID**  
2922 WEST FAIRVIEW, ALLENTOWN, PA  
Problem # 3                      DATE: February 18, 2004

MVC #: 133

IR #: N/A

**LOCATION**

Linda David's Home at 2922 West Fairview, Allentown,  
PA

**EQUIPMENT**

Possible 600 GPM Pumps-Not Sound Isolated Like  
Pictured Pump

**PROBLEM**

Note, rubber isomer pads under mounts.

NO THERMOGRAM NECESSARY

**COMMENTS / RECOMMENDATION**

Check South Whitehall Twp Pumps for vibration, isolation.

**MAINTENANCE HISTORY**

DATE: \_\_\_\_\_ INITIALS \_\_\_\_\_

ACTION TAKEN:

DATE: \_\_\_\_\_ INITIALS \_\_\_\_\_

ACTION TAKEN:

RESERVED FOR THERMOGRAM  
AFTER COMPONENT REPAIR

DATE: \_\_\_\_\_ INITIALS \_\_\_\_\_

ACTION TAKEN:

**INFRARED**  
PREVENTIVE MAINTENANCE SURVEY  
For  
LINDA DAVID  
2922 WEST FAIRVIEW, ALLENTOWN, PA  
Problem # 4                      DATE: February 18, 2004

MVC #: 141, 142 & 143                      IR #: N/A  
LOCATION  
Linda David's Home at 2922 West Fairview, Allentown,  
PA



20 8:20AM

**EQUIPMENT**  
Cracks in Ceiling and Walls

**PROBLEM**  
\$3000 of work done already. What is causing cracks?

**COMMENTS / RECOMMENDATION**  
Are water pumps vibrating and causing damage?  
Investigate.

20 8:21AM

**MAINTENANCE HISTORY**

DATE \_\_\_\_\_ INITIALS \_\_\_\_\_  
ACTION TAKEN \_\_\_\_\_

DATE \_\_\_\_\_ INITIALS \_\_\_\_\_  
ACTION TAKEN \_\_\_\_\_

DATE \_\_\_\_\_ INITIALS \_\_\_\_\_  
ACTION TAKEN \_\_\_\_\_

20 8:21AM

**INFRARED**  
PREVENTIVE MAINTENANCE SURVEY  
For  
LINDA DAVID  
2922 WEST FAIRVIEW, ALLENTOWN, PA  
Problem #: 5                      DATE: February 18, 2004

MVC #: 144, 145 & 146              IR #: N/A  
LOCATION  
Linda David's Home at 2922 West Fairview, Allentown,  
PA

**EQUIPMENT**  
Cracks in Ceiling and Walls

**PROBLEM**  
\$3000 of work done already. What is causing cracks?

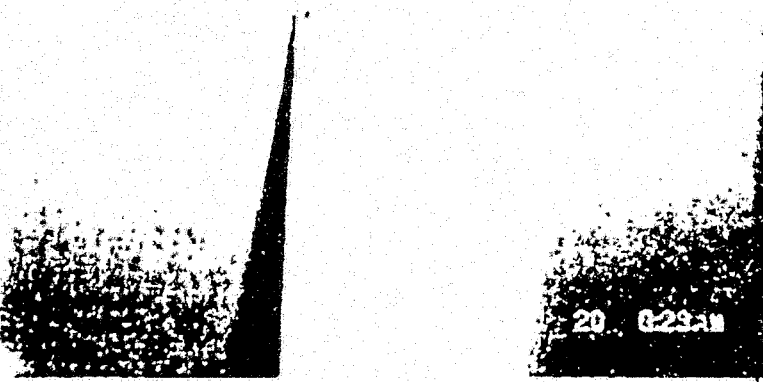
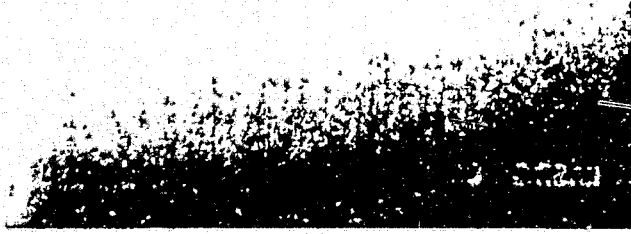
**COMMENTS / RECOMMENDATION**  
Are water pumps vibrating and causing damage?  
Investigate.

**MAINTENANCE HISTORY**

DATE: \_\_\_\_\_ INITIALS \_\_\_\_\_  
ACTION TAKEN:

DATE: \_\_\_\_\_ INITIALS \_\_\_\_\_  
ACTION TAKEN:

DATE: \_\_\_\_\_ INITIALS \_\_\_\_\_  
ACTION TAKEN:



**INFRARED  
PREVENTIVE MAINTENANCE SURVEY**

For  
**LINDA DAVID**  
2922 WEST FAIRVIEW, ALLENTOWN, PA  
Problem # 6                      DATE: February 18, 2004

MVC # 147, 148 & 149              IR #: N/A  
LOCATION  
Linda David's Home at 2922 West Fairview, Allentown,  
PA

**EQUIPMENT**  
Cracks in Ceiling and Walls

**PROBLEM**  
\$3000 of work done already. What is causing cracks?

**COMMENTS / RECOMMENDATION**  
Are water pumps vibrating and causing damage?  
Investigate.

**MAINTENANCE HISTORY**

DATE \_\_\_\_\_ INITIALS \_\_\_\_\_  
ACTION TAKEN \_\_\_\_\_

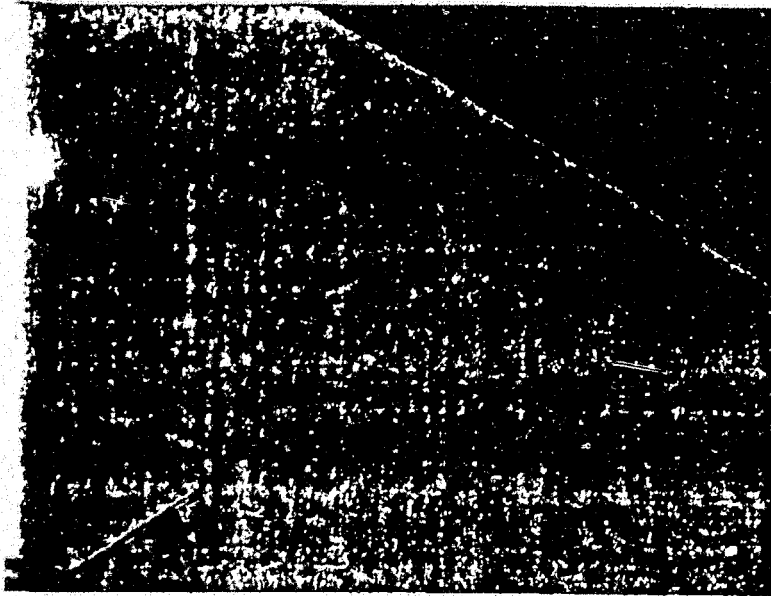
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ACTION TAKEN \_\_\_\_\_

DATE \_\_\_\_\_ INITIALS \_\_\_\_\_  
ACTION TAKEN \_\_\_\_\_

20 8:25A+

20 8:25 AM

20 8:25 AM



**INFRARED**  
 PREVENTIVE MAINTENANCE SURVEY  
 For  
 LINDA DAVID  
 2922 WEST FAIRVIEW, ALLENTOWN, PA  
 Problem # 7                      DATE: February 18, 2004

MVC #: 150, 151 & 152      IR #: N/A  
 LOCATION  
 Linda David's Home at 2922 West Fairview, Allentown,  
 PA

**EQUIPMENT**  
 Cracks in Ceiling and Walls

**PROBLEM**  
 \$3000 of work done already. What is causing cracks?

**COMMENTS / RECOMMENDATION**  
 Are water pumps vibrating and causing damage?  
 Investigate

**MAINTENANCE HISTORY**

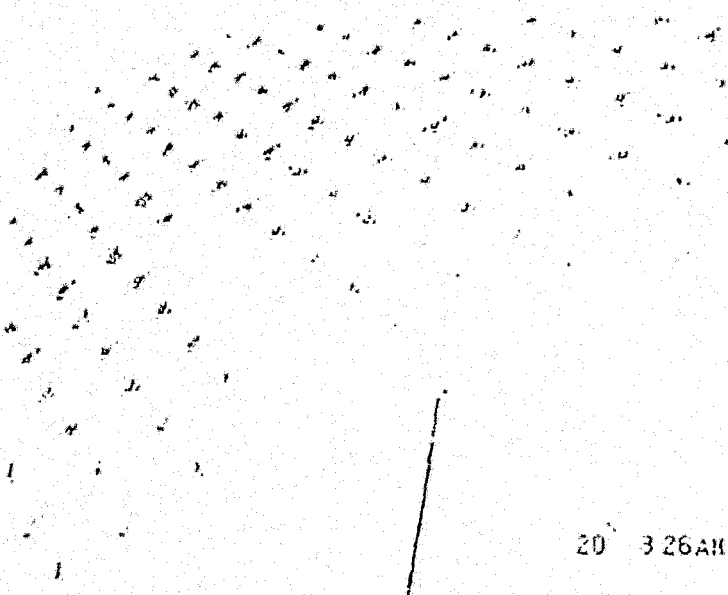
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DATE: \_\_\_\_\_ INITIALS: \_\_\_\_\_  
 ACTION TAKEN: \_\_\_\_\_

DATE: \_\_\_\_\_ INITIALS: \_\_\_\_\_  
 ACTION TAKEN: \_\_\_\_\_

20 8 26 AM

20 3 26 AM



**INFRARED**  
PREVENTIVE MAINTENANCE SURVEY  
For  
LINDA DAVID  
2922 WEST FAIRVIEW, ALLENTOWN, PA  
Problem #. 8                      DATE. February 18, 2004

MVC # 153, 154 & 155              IR # N/A  
LOCATION  
Linda David's Home at 2922 West Fairview, Allentown,  
PA

**EQUIPMENT**  
Cracks in Ceiling and Walls

**PROBLEM**  
\$3000 of work done already. What is causing cracks?

**COMMENTS / RECOMMENDATION**  
Are water pumps vibrating and causing damage?  
Investigate.

20 8:26 AM

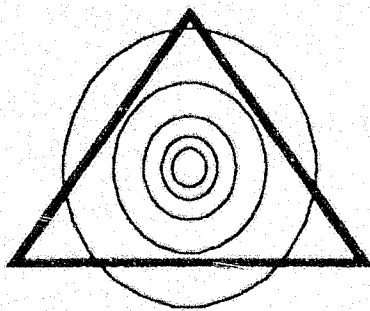
**MAINTENANCE HISTORY**

DATE \_\_\_\_\_ INITIALS \_\_\_\_\_  
ACTION TAKEN \_\_\_\_\_

DATE \_\_\_\_\_ INITIALS \_\_\_\_\_  
ACTION TAKEN \_\_\_\_\_

DATE \_\_\_\_\_ INITIALS \_\_\_\_\_  
ACTION TAKEN \_\_\_\_\_

20 3:25 AM



# TRINITY ASSOCIATES, INC.

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

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

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(610) 876-6428

FAX (610) 876-7178

EMAIL [TRNTYEE@BELLATLANTIC.NET](mailto:TRNTYEE@BELLATLANTIC.NET) [Http://www.TRINITYASSOC](http://www.TRINITYASSOC)

May 3, 2004

Mr Steven R Henning, P E  
Manager, Environmental Division  
The Pidcock Company  
2451 Parkwood Drive  
Allentown, PA 18103-9608

Dear Steve.

In response to you letter dated April 15, 2004 that:

1. There is no vibration while standing inside or outside the building while the pump is running,
2. The building foundation is not located on bedrock,
3. The pump frame is separated from the concrete floor by approximately ½ inch thick elastomeric material pad around its perimeter and the pipe penetrations through the floor are surrounded with an elastomeric seal,"

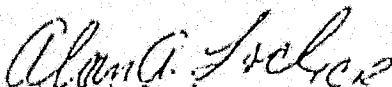
While never inside the location and realizing you could have omitted things, all the above mean is that all the motor and pump vibration is free to go into the 12" and 8" diameter pipe connected to the pump(s) which runs by Ms. Davids' house.

Is there a rubber vibration dampening expansion/sound isolation section in the pipe like the attached picture MVC 129 (previously forwarded) shows? If it isn't, why don't you recommend suction and discharge vibration isolators be installed?



Please inform me if the rubber pipe sections are in place at your earliest convenience.

Sincerely yours,

  
Alan A. Loch  
Manager

Cc: Linda David ✓  
Mr. Thomas Uff

Attached picture

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2007 JAN -8 AM 9:04

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DOCUMENT  
FOLDER

**DOCKETED**

JAN 0 8 2007

C-20055501  
11/30/06, PHILA

**EXHIBIT "3-1"**

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 SEPTEMBER 13, 17, 23 & 24, 2004

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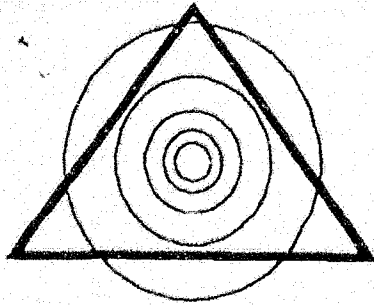
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 SECRETARY'S BUREAU

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RESHOOT OF CRACKS FROM 2/18/04 REPORT

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## LINDA DAVID'S HOUSE VIBRATION ANALYSIS & MAGNETIC FIELD STUDIES SPECIAL COMMENTS

On September 13, 17, 23 & 24, 2004, vibration analysis and magnetic field current measuring was done at the home of Linda David, 2922 Fairview, Allentown, PA.

We found very low readings generally as the enclosed results show except when the pump(s) were running at the water pumping station. Then we measured 5-10 times higher readings at distinctive frequencies that matched those frequencies present at the water station with the pumps running. When the pump shutdown at the water station, the vibration goes away at the house and the water station.

I physically felt the vibration in the main water pipe when my ring started rattling against the pipe. Ms. David rented a \$10,000 vibration meter and it printed out the chart shown in page 31. The distinctive almost impossible to duplicate by chance readings were duplicated at the water station. I believe there is almost a 100% connection between vibration in the house and the pump(s) running. Note, #19 shows a new crack at the location in the wall below which the water pipe comes into the house.

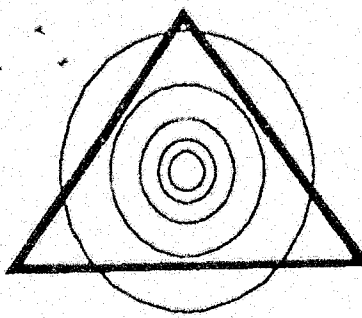
Before the water company wanted evidence, forcing Ms. David to hire us when they should have done the study at their own expense since we showed them the proper sound rubber isolation rubber sections weren't installed in their pipes at the pumping station.

Now the study is done. The water authority should install rubber sections immediately. To stall further is a cover-up in my opinion and not only should the authority be subject to fines, but those in charge should be held personally liable if action isn't taken.

We also measured circulating current in Ms. David's water pipes as the charts show. The ground rods we were going to install were installed, but an 8 foot rod cut into three sections drilled (yes, a hammer drill was necessary) into the rock only produced an ohm reading of 260  $\Omega$  when the normal is under 5 and the required at commercial, etc., by the National Electrical Code, is 25 ohms.

Well, we dumped 14 5 containers of salt and got it down to 36 ohms. The next day we put another 6 feet of rod in the ground only to still have the reading more than 30 ohms. Since the site probably needs another 14 or more large containers and another ground is somewhere in the house, the project was put on hold. Note, the fact is the soil around Linda's house is an extremely good insulator, such that only 2 or 3 locations where I've done testing at 1000 locations in 25 years equals the high resistance found at Linda's.

What this means is that much of the unbalanced (neutral) current flows back to the transformer closest to Ms. David's house through her water pipe from her neighbors houses through the pipes creating a magnetic field above the pipe as the magnetic field measuring device of PP&L showed.



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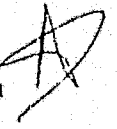
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Page 2

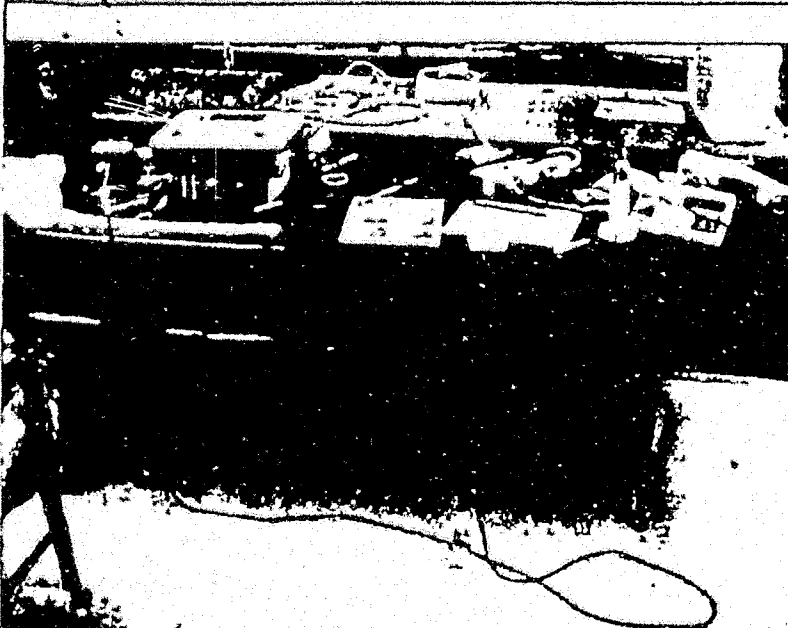
Thus, the two effects could be present at the same time and turning off the pump wouldn't have affected the magnetic field (Mr. Uff said he felt like he was in an MRI) and the effects could be much worse than we measured at different times. Ms. David says they are worse at night. Note, my forearm turned red after two days in her house.



Please call if you have any questions.

Sincerely yours,

*Alan A. Loch*  
Alan A. Loch



**ENTEK IRD**

**MODEL**

RESERVED FOR THERMOGRAM  
AFTER COMPONENT REPAIR

**INFRARED  
PREVENTIVE MAINTENANCE SURVEY**

For  
**LINDA DAVID  
ALLENTOWN, PA**

Problem # 1

DATE September 15, 2004

MVC # 200 & 208

IR # N/A

LOCATION

Baseline Done in Shop in Chester, Multipurpose Room

**EQUIPMENT**

Floor (Vibration in Ground) Vibration Analyzer-EN TEK  
IRD, Model 838 Analyzer, Electrorent 1171k53, Model  
97019697, S/N 200004115 Probe

**PROBLEM**

Noise 001 at 300

**COMMENTS / RECOMMENDATION**

Vel = in, in/S. For comparison.

**MAINTENANCE HISTORY**

DATE: \_\_\_\_\_ INITIALS \_\_\_\_\_  
ACTION TAKEN:

DATE \_\_\_\_\_ INITIALS \_\_\_\_\_  
ACTION TAKEN:

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ACTION TAKEN:

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**INFRARED  
PREVENTIVE MAINTENANCE SURVEY**

For  
**LINDA DAVID  
ALLENTOWN, PA**

Problem #: 2

DATE: September 15, 2004

MVC #: 201 & 202

IR # N/A

**LOCATION**

Baseline done in Shop in Chester. Multipurpose Room

**EQUIPMENT**

Vibration Analyzer-EN TEK IRD, Model 838 Analyzer,  
Electrorent 1171k53, Model 97019697, S/N 200004115  
Probe - Fan With Vibration Monitor on it

**PROBLEM**

1 at 1K and .22 at 5K.

**COMMENTS / RECOMMENDATION**

Vel = in inch/S. For comparison. Compare with problem  
pages #2 & 3 where probe further away.

**MAINTENANCE HISTORY**

DATE: \_\_\_\_\_ INITIALS \_\_\_\_\_  
ACTION TAKEN \_\_\_\_\_

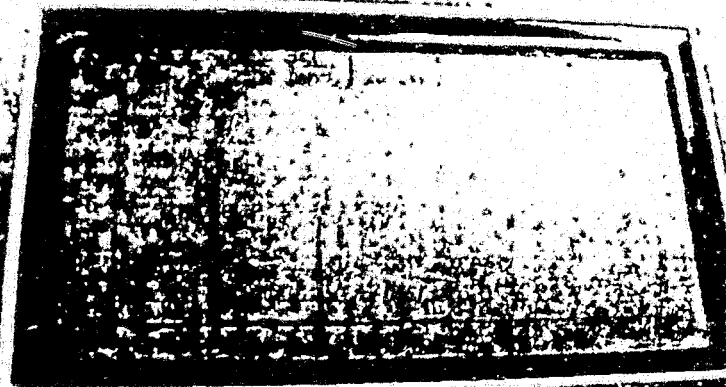
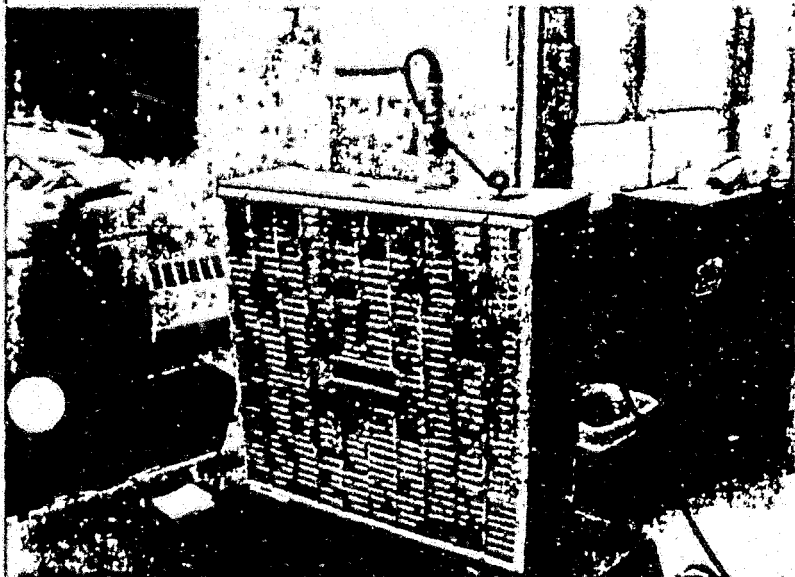
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ACTION TAKEN \_\_\_\_\_

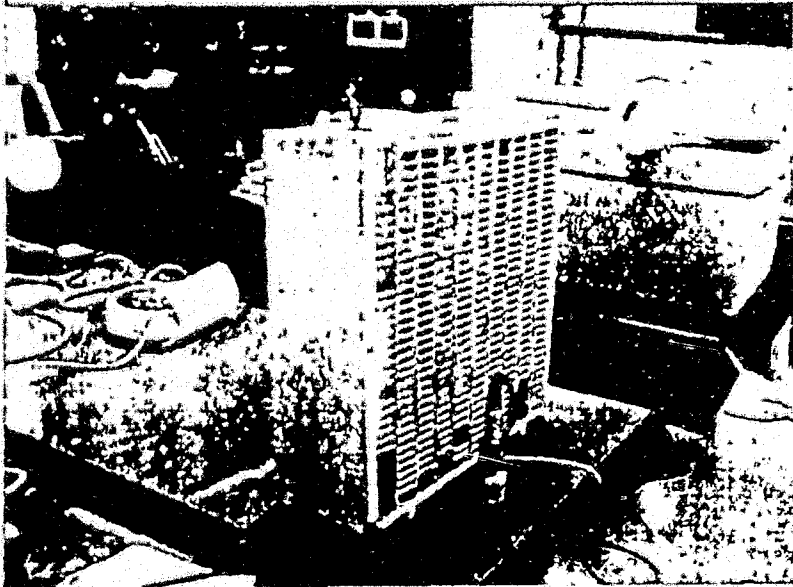
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ACTION TAKEN \_\_\_\_\_

RESERVED FOR THERMOGRAM  
AFTER COMPONENT REPAIR

**ENTEK IRD**

**MODEL 838 ANA**





TEK IRD

RESERVED FOR THERMOGRAM  
AFTER COMPONENT REPAIR

**INFRARED  
PREVENTIVE MAINTENANCE SURVEY**

For  
LINDA DAVID  
ALLENTOWN, PA

Problem # 3

DATE: September 15, 2004

MVC # 203 & 204

IR # N/A

**LOCATION**

Baseline Done in Shop in Chester, Multipurpose Room

**EQUIPMENT**

Vibration Analyzer-EN TEK IRD, Model 838 Analyzer,  
Electrorent 1171k53, Model 97019697, S/N 200004115  
Probe Fan with Vibration Monitor 6" in Front

**PROBLEM**

.09 at 1K and .07 at 5K

**COMMENTS / RECOMMENDATION**

Vel = in/S. For comparison with problems pages #2 & 4.  
Note, this probe isn't on fan but on table besides fan.

**MAINTENANCE HISTORY**

DATE \_\_\_\_\_ INITIALS \_\_\_\_\_  
ACTION TAKEN \_\_\_\_\_

DATE \_\_\_\_\_ INITIALS \_\_\_\_\_  
ACTION TAKEN \_\_\_\_\_

DATE \_\_\_\_\_ INITIALS \_\_\_\_\_  
ACTION TAKEN \_\_\_\_\_

**INFRARED  
PREVENTIVE MAINTENANCE SURVEY**

For  
**LINDA DAVID  
ALLENTOWN, PA**

Problem # 4

DATE: September 15, 2004

MVC # 205 & 206

IR #: N/A

**LOCATION**

Baseline Done in Shop in Chester, Multipurpose Room

**EQUIPMENT**

Vibration Analyzer-EN TEK IRD, Model 838 Analyzer,  
Electrorent 1171k53, Model 97019697, S/N 200004115  
Probe - Fan with Vibration Monitor 0 Feet from It

**PROBLEM**

.032 at 1K.

**COMMENTS / RECOMMENDATION**

Vel = in/S. For comparison with problems pages #2 & 3.  
Note, probe is 8 feet away from fan.

**MAINTENANCE HISTORY**

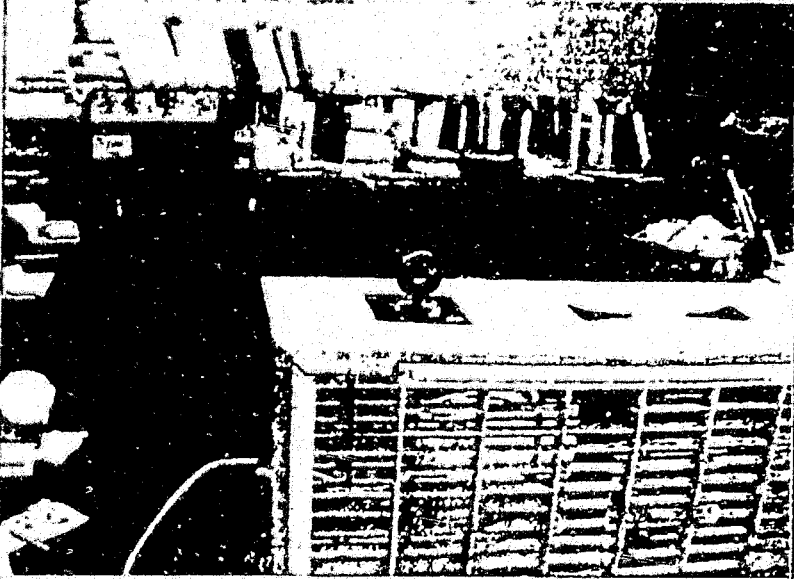
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DATE \_\_\_\_\_ INITIALS \_\_\_\_\_  
ACTION TAKEN: \_\_\_\_\_

DATE \_\_\_\_\_ INITIALS \_\_\_\_\_  
ACTION TAKEN: \_\_\_\_\_

RESERVED FOR THERMOGRAM  
AFTER COMPONENT REPAIR

ENTEK IRD MODEL 838 A



**INFRARED  
PREVENTIVE MAINTENANCE SURVEY**

For  
**LINDA DAVID  
ALLENTOWN, PA**

Problem # 5

DATE: September 15, 2004

MVC # 209 & 210

IR # N/A

**LOCATION**

Linda David's House - Kitchen, September 17, 2004  
1:54 p.m.

**EQUIPMENT**

Vibration Analyzer-EN TEK IRD, Model 838 Analyzer,  
Electrorent 1171k53, Model 97019697, S/N 200004115  
Probe - Floor with Refrigerator Off

**PROBLEM**

Wide band spectrum 0015 at 0-600.

**COMMENTS / RECOMMENDATION**

For record.

**MAINTENANCE HISTORY**

DATE \_\_\_\_\_ INITIALS \_\_\_\_\_  
ACTION TAKEN:

DATE \_\_\_\_\_ INITIALS \_\_\_\_\_  
ACTION TAKEN:

DATE \_\_\_\_\_ INITIALS \_\_\_\_\_  
ACTION TAKEN:

RESERVED FOR THERMOGRAM  
AFTER COMPONENT REPAIR





**INFRARED  
PREVENTIVE MAINTENANCE SURVEY**

For  
LINDA DAVID  
ALLENTOWN, PA

Problem # 6

DATE September 15, 2004

MVC # 210 & 211

IR #: N/A

**LOCATION**

Linda David's House-September 17, 2004  
1.59 p.m.

**EQUIPMENT**

Vibration Analyzer-EN TEK IRD, Model 838 Analyzer,  
Electrorent 1171k53, Model 97019697, S/N 200004115  
Probe - Floor with Refrigerator On

**PROBLEM**

Wide bank as above and spiked of .0026 at 3600.

**COMMENTS / RECOMMENDATION**

For record. Refrigerator caused spike.

**MAINTENANCE HISTORY**

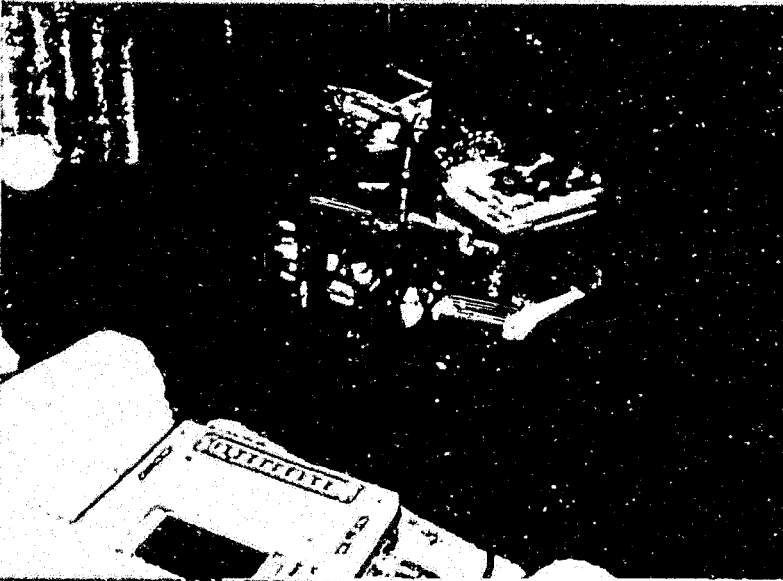
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ACTION TAKEN: \_\_\_\_\_

DATE: \_\_\_\_\_ INITIALS \_\_\_\_\_  
ACTION TAKEN: \_\_\_\_\_

DATE: \_\_\_\_\_ INITIALS \_\_\_\_\_  
ACTION TAKEN: \_\_\_\_\_

RESERVED FOR THERMOGRAM  
AFTER COMPONENT REPAIR





**INFRARED  
PREVENTIVE MAINTENANCE SURVEY**

For  
**LINDA DAVID  
ALLENTOWN, PA**

Problem # 8                      DATE September 15, 2004

MVC # 214 & 215                      IR # N/A

**LOCATION**

Linda David's House - Kitchen, September 17, 2004  
2 06 p.m

**EQUIPMENT**

Vibration Analyzer-EN TEK IRD, Model 838 Analyzer,  
Electrorent 1171k53, Model 97019697, S/N 200004115  
Probe - Living Room Table

**PROBLEM**

Wide band as shown .0015 at 0-250.

**COMMENTS / RECOMMENDATION**

For record.

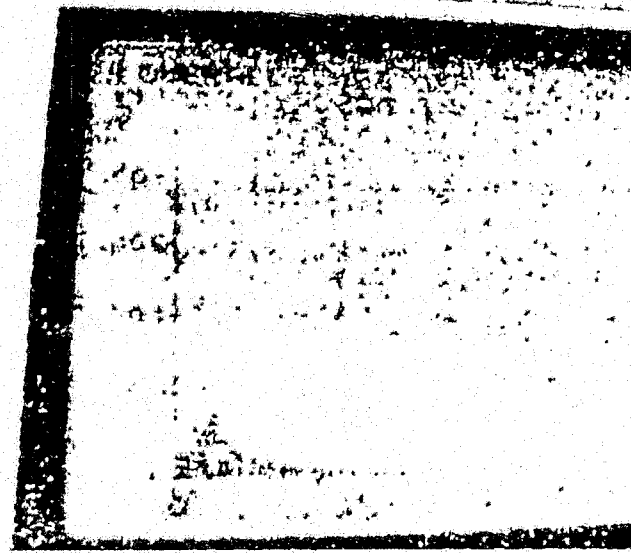
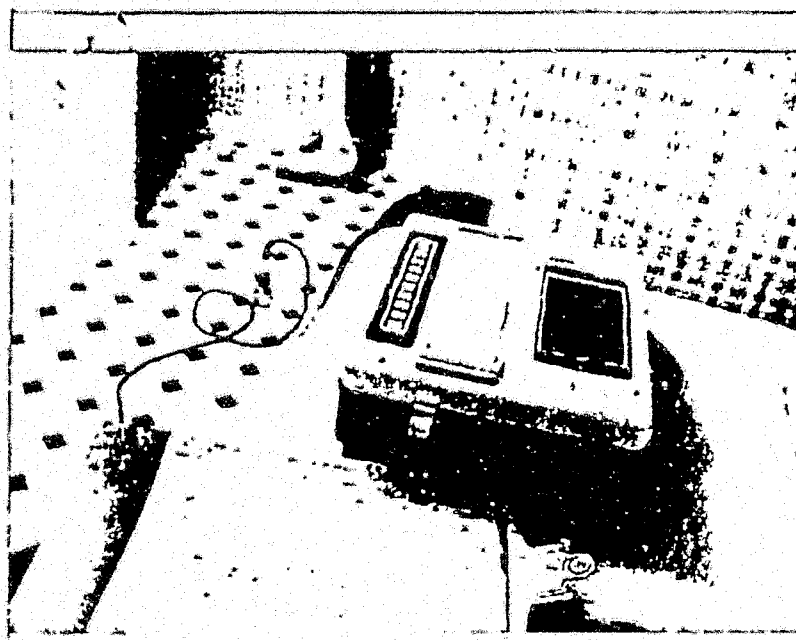
**MAINTENANCE HISTORY**

DATE \_\_\_\_\_ INITIALS \_\_\_\_\_  
ACTION TAKEN \_\_\_\_\_

DATE \_\_\_\_\_ INITIALS \_\_\_\_\_  
ACTION TAKEN \_\_\_\_\_

DATE \_\_\_\_\_ INITIALS \_\_\_\_\_  
ACTION TAKEN \_\_\_\_\_

RESERVED FOR THERMOGRAM  
AFTER COMPONENT REPAIR



**INFRARED  
PREVENTIVE MAINTENANCE SURVEY**

For  
**LINDA DAVID  
ALLENTOWN, PA**

Problem #. 9

DATE September 17, 2004

MVC #. 216 & 217

IR #. N/A

**LOCATION**

Linda David, Laundry Room

**EQUIPMENT**

Vibration Analyzer-EN TEK IRD, Model 838 Analyzer,  
Electrorent 1171k53, Model 97019697, S/N 200004115  
Probe - Floor 2:12 p.m

**PROBLEM**

Wide band .0015 at 0-400.

**COMMENTS / RECOMMENDATION**

For information.

**MAINTENANCE HISTORY**

DATE \_\_\_\_\_ INITIALS \_\_\_\_\_

ACTION TAKEN

DATE \_\_\_\_\_ INITIALS \_\_\_\_\_

ACTION TAKEN

DATE \_\_\_\_\_ INITIALS \_\_\_\_\_

ACTION TAKEN

RESERVED FOR THERMOGRAM  
AFTER COMPONENT REPAIR



**INFRARED  
PREVENTIVE MAINTENANCE SURVEY**

For  
**LINDA DAVID  
ALLENTOWN, PA**

Problem # 10

DATE: September 17, 2004

MVC # 218 & 219

IR #: N/A

**LOCATION**

Linda David, Garage

**EQUIPMENT**

Vibration Analyzer-EN TEK IRD, Model 838 Analyzer,  
Electrorent 1171k53, Model 97019697, S/N 200004115  
Probe - Floor 2:20 p.m.

**PROBLEM**

Wide band 0015 at 0-40

**COMMENTS / RECOMMENDATION**

For information.

**MAINTENANCE HISTORY**

DATE: \_\_\_\_\_ INITIALS \_\_\_\_\_  
ACTION TAKEN

DATE: \_\_\_\_\_ INITIALS \_\_\_\_\_  
ACTION TAKEN:

DATE: \_\_\_\_\_ INITIALS \_\_\_\_\_  
ACTION TAKEN:

RESERVED FOR THERMOGRAM  
AFTER COMPONENT REPAIR



**INFRARED  
PREVENTIVE MAINTENANCE SURVEY**

For  
**LINDA DAVID  
ALLENTOWN, PA**

Problem # 11

DATE: September 17, 2004

MVC #: 220 & 221

IR # N/A

**LOCATION**

Linda David, Front Porch Concrete

**EQUIPMENT**

Vibration Analyzer-EN TEK IRD, Model 838 Analyzer,  
Electrorent 1171k53, Model 97019697, S/N 200004115  
Probe - Step 2 26 p.m.

**PROBLEM**

Wide band .0011 at 0-400.

**COMMENTS / RECOMMENDATION**

For information.

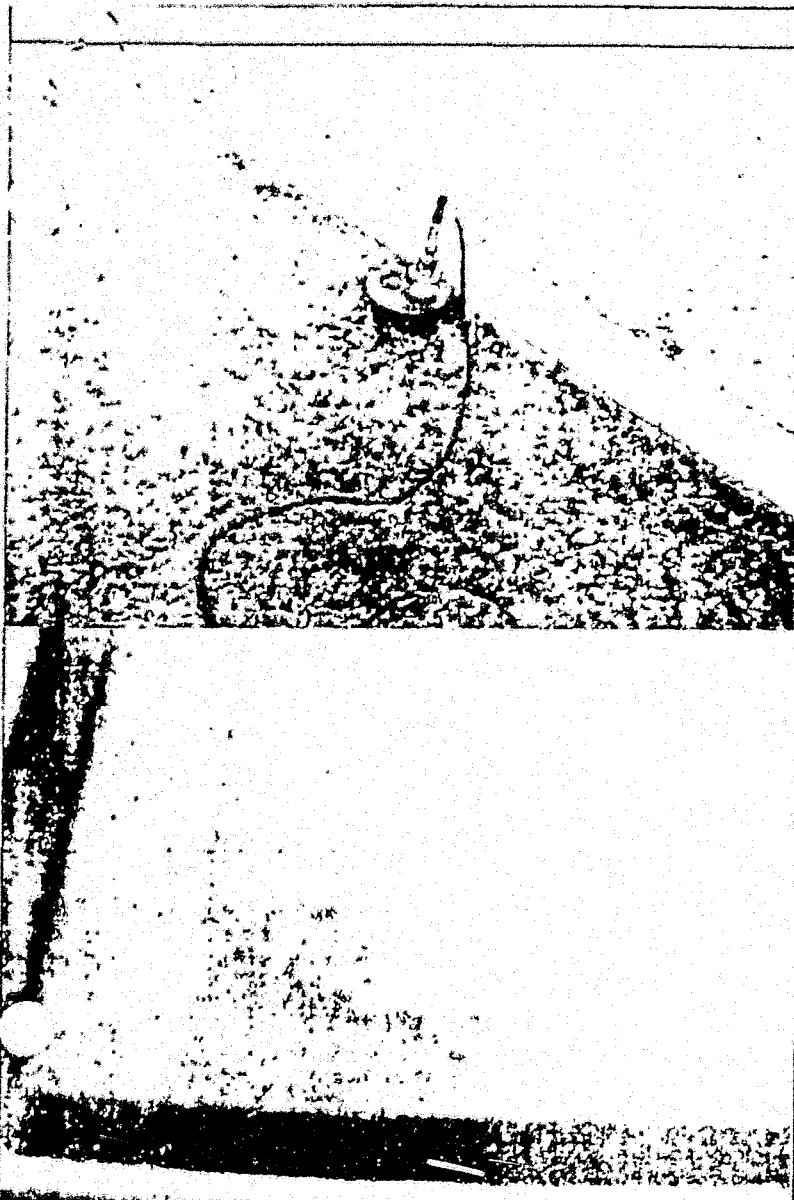
**MAINTENANCE HISTORY**

DATE: \_\_\_\_\_ INITIALS \_\_\_\_\_  
ACTION TAKEN:

DATE: \_\_\_\_\_ INITIALS \_\_\_\_\_  
ACTION TAKEN:

DATE: \_\_\_\_\_ INITIALS \_\_\_\_\_  
ACTION TAKEN:

RESERVED FOR THERMOGRAM  
AFTER COMPONENT REPAIR



**INFRARED  
PREVENTIVE MAINTENANCE SURVEY**

*For*  
**LINDA DAVID  
ALLENTOWN, PA**

Problem # 12                      DATE: September 17, 2004

MVC # 222 & 223                      IR #. N/A  
**LOCATION**  
Linda David, Water Turn Off Access - Front Yard at Street

**EQUIPMENT**  
Vibration Analyzer-EN TEK IRD, Model 838 Analyzer,  
Electrorent 1171k53, Model 97019697, S/N 200004115  
Probe - Water Vent 2:29 p.m.

**PROBLEM**  
Wide band 0015 at 0-400

**COMMENTS / RECOMMENDATION**  
For information.

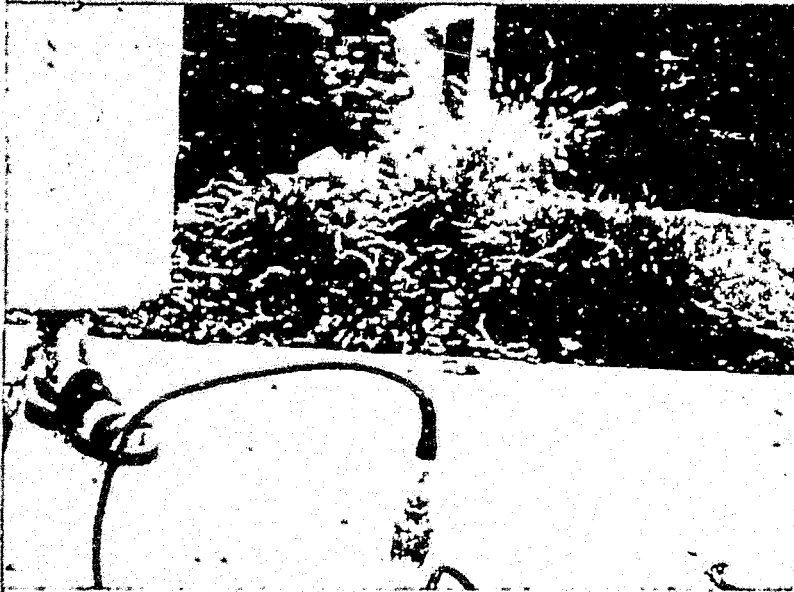
**MAINTENANCE HISTORY**

DATE \_\_\_\_\_ INITIALS \_\_\_\_\_  
ACTION TAKEN \_\_\_\_\_

DATE \_\_\_\_\_ INITIALS \_\_\_\_\_  
ACTION TAKEN \_\_\_\_\_

DATE \_\_\_\_\_ INITIALS \_\_\_\_\_  
ACTION TAKEN \_\_\_\_\_

RESERVED FOR THERMOGRAM  
AFTER COMPONENT REPAIR



**INFRARED**  
PREVENTIVE MAINTENANCE SURVEY  
For  
LINDA DAVID  
ALLENTOWN PA

Problem #: 13

DATE: September 17, 2004

MVC #: 224

IR #: N/A

**LOCATION**

Linda David, Next Door Neighbor

**EQUIPMENT**

Vibration Analyzer-EN TEK IRD, Model 838 Analyzer,  
Electrorent 1171k53, Model 97019697, S/N 200004115  
Probe - Front Walk 2:34 p.m.

**PROBLEM**

Wide band .0015 at 0-400.

**COMMENTS / RECOMMENDATION**

For information.

**MAINTENANCE HISTORY**

DATE: \_\_\_\_\_ INITIALS \_\_\_\_\_  
ACTION TAKEN

DATE: \_\_\_\_\_ INITIALS \_\_\_\_\_  
ACTION TAKEN

DATE: \_\_\_\_\_ INITIALS \_\_\_\_\_  
ACTION TAKEN

RESERVED FOR THERMOGRAM  
AFTER COMPONENT REPAIR

**INFRARED  
PREVENTIVE MAINTENANCE SURVEY**

*For*  
**LINDA DAVID  
ALLENTOWN, PA**

Problem #. 14

DATE September 17, 2004

MVC #. 226 & 225

IR # N/A

**LOCATION**

Linda David, Sidewalk (curved) Next to Parking Lot

**EQUIPMENT**

Vibration Analyzer-EN TEK IRD, Model 838 Analyzer,  
Electrorent 1171k53, Model 97019697, S/N 200004115  
Probe - Sidewalk 2:37 p.m.

**PROBLEM**

Wide band 0012 at 0-400.

**COMMENTS / RECOMMENDATION**

For information.

**MAINTENANCE HISTORY**

DATE \_\_\_\_\_ INITIALS \_\_\_\_\_

ACTION TAKEN:

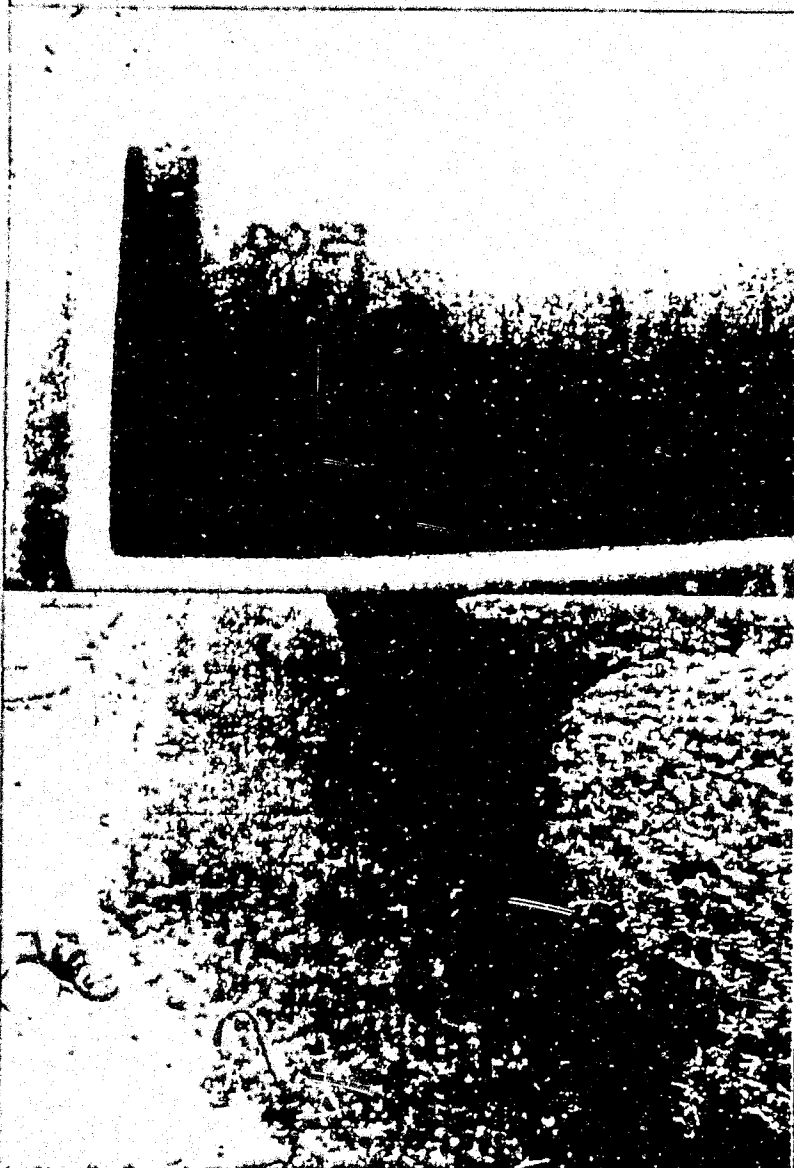
DATE \_\_\_\_\_ INITIALS \_\_\_\_\_

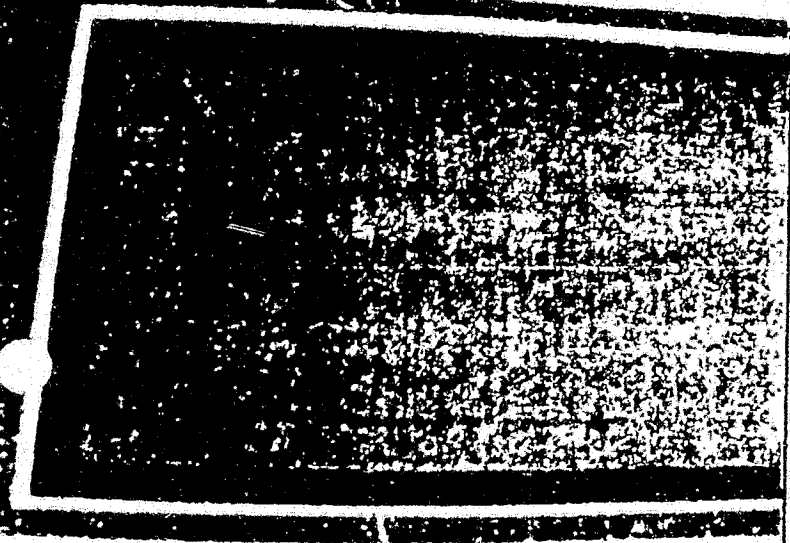
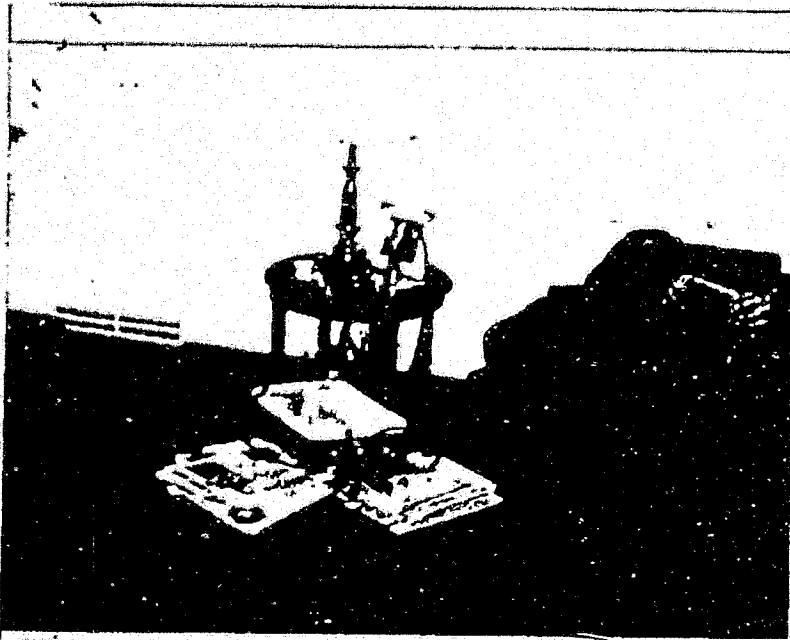
ACTION TAKEN:

DATE \_\_\_\_\_ INITIALS \_\_\_\_\_

ACTION TAKEN:

RESERVED FOR THERMOGRAM  
AFTER COMPONENT REPAIR





**INFRARED**  
PREVENTIVE MAINTENANCE SURVEY  
For  
LINDA DAVID  
ALLENTOWN, PA

Problem # 15                      DATE: September 17, 2004

MVC # 227 & 228                      IR #: N/A  
LOCATION  
Linda David's House, Living room

**EQUIPMENT**  
Vibration Analyzer-EN TEK IRD, Model 838 Analyzer,  
Electrorent 1171k53, Model 97019697, S/N 200004115  
Probe - Living Room Table 2:43 p m

**PROBLEM**  
Wide band .001, wide band 0-400

**COMMENTS / RECOMMENDATION**  
For information.

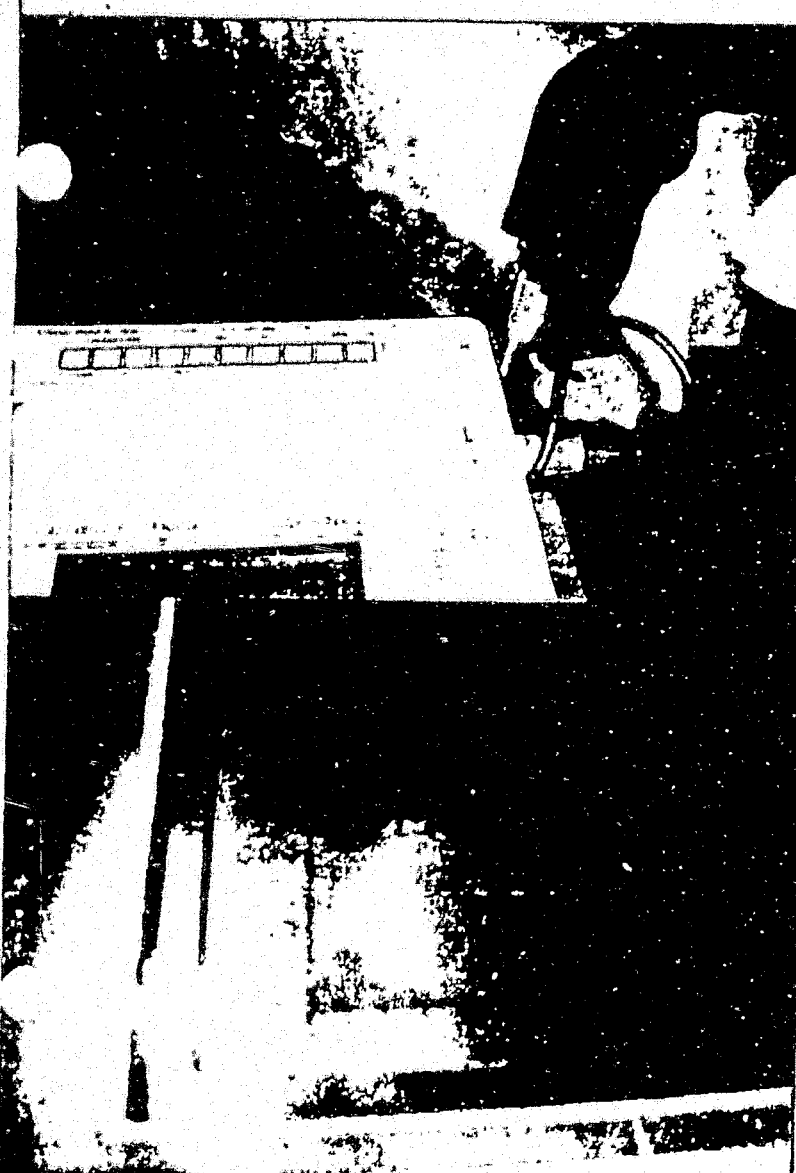
**MAINTENANCE HISTORY**

DATE \_\_\_\_\_ INITIALS \_\_\_\_\_  
ACTION TAKEN

DATE \_\_\_\_\_ INITIALS \_\_\_\_\_  
ACTION TAKEN

DATE \_\_\_\_\_ INITIALS \_\_\_\_\_  
ACTION TAKEN

RESERVED FOR THERMOGRAM  
AFTER COMPONENT REPAIR



**INFRARED**  
PREVENTIVE MAINTENANCE SURVEY  
For  
LINDA DAVID  
ALLENTOWN, PA

Problem # 16

DATE September 17, 2004

MVC # 229 & 230

IR # N/A

**LOCATION**

Linda David, Master Bedroom

**EQUIPMENT**

Vibration Analyzer-EN TEK IRD, Model 838 Analyzer,  
Electrorent 1171k53, Model 97019697, S/N 200004115  
Probe - Bedroom Bed 2:56 p.m

**PROBLEM**

Wide band .0015 at 0-400.

**COMMENTS / RECOMMENDATION**

For information.

**MAINTENANCE HISTORY**

DATE \_\_\_\_\_ INITIALS \_\_\_\_\_  
ACTION TAKEN:

DATE \_\_\_\_\_ INITIALS \_\_\_\_\_  
ACTION TAKEN:

DATE \_\_\_\_\_ INITIALS \_\_\_\_\_  
ACTION TAKEN:

RESERVED FOR THERMOGRAM  
AFTER COMPONENT REPAIR



**INFRARED  
PREVENTIVE MAINTENANCE SURVEY**

For  
**LINDA DAVID  
ALLENTOWN, PA**

Problem #: 17

DATE: September 17, 2004

MVC # 231 & 232

IR # N/A

**LOCATION**

Linda David, Dining Room

**EQUIPMENT**

Vibration Analyzer-EN TEK IRD, Model 838 Analyzer,  
Electrorent 1171k53, Model 97019697, S/N 200004115  
Probe - Dining Room Table 3:20 p.m.

**PROBLEM**

Wide band .0015 at 0-400.

**COMMENTS / RECOMMENDATION**

For information.

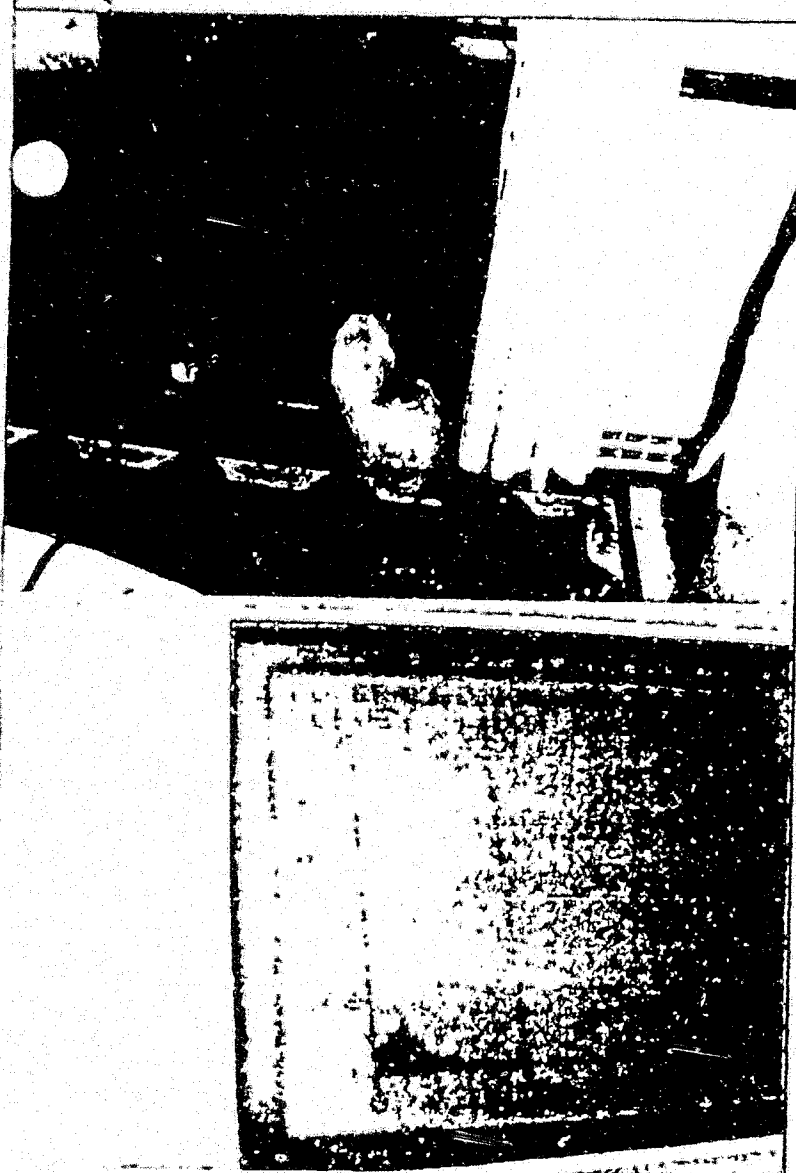
**MAINTENANCE HISTORY**

DATE: \_\_\_\_\_ INITIALS \_\_\_\_\_  
ACTION TAKEN: \_\_\_\_\_

DATE: \_\_\_\_\_ INITIALS \_\_\_\_\_  
ACTION TAKEN: \_\_\_\_\_

DATE: \_\_\_\_\_ INITIALS \_\_\_\_\_  
ACTION TAKEN: \_\_\_\_\_

RESERVED FOR THERMOGRAM  
AFTER COMPONENT REPAIR



**INFRARED  
PREVENTIVE MAINTENANCE SURVEY**

For  
**LINDA DAVID  
ALLENTOWN, PA**

Problem #. 18

DATE September 17, 2004

MVC # 233 & 234

IR # N/A

LOCATION  
Linda David, Deck

**EQUIPMENT**

Vibration Analyzer-EN TEK IRD, Model 838 Analyzer,  
Electrorent 1171k53, Model 97019697, S/N 200004115  
Probe - Deck Floor

**PROBLEM**

Wide band .001 at 0-400

**COMMENTS / RECOMMENDATION**

For information.

**MAINTENANCE HISTORY**

DATE: \_\_\_\_\_ INITIALS: \_\_\_\_\_  
ACTION TAKEN: \_\_\_\_\_

DATE: \_\_\_\_\_ INITIALS: \_\_\_\_\_  
ACTION TAKEN: \_\_\_\_\_

DATE: \_\_\_\_\_ INITIALS: \_\_\_\_\_  
ACTION TAKEN: \_\_\_\_\_

RESERVED FOR THERMOGRAM  
AFTER COMPONENT REPAIR

**INFRARED  
PREVENTIVE MAINTENANCE SURVEY**

For  
**LINDA DAVID  
ALLENTOWN, PA**

Problem #: 19

DATE: September 23, 2004

MVC #: 255, 256 & 257      IR #: N/A

**LOCATION**

Linda David, Front of House above Main Water Pipe  
Entering Crawl Space

**EQUIPMENT**

Vibration Analyzer-EN TEK IRD, Model 838 Analyzer,  
Electrorent 1171k53, Model 97019697, S/N 200004115  
Probe - Front Wall Under Window

**PROBLEM**

Wall is cracking probably due to vibration caused by water  
pumping station. New crack per DEP Blasting Division.

**COMMENTS / RECOMMENDATION**

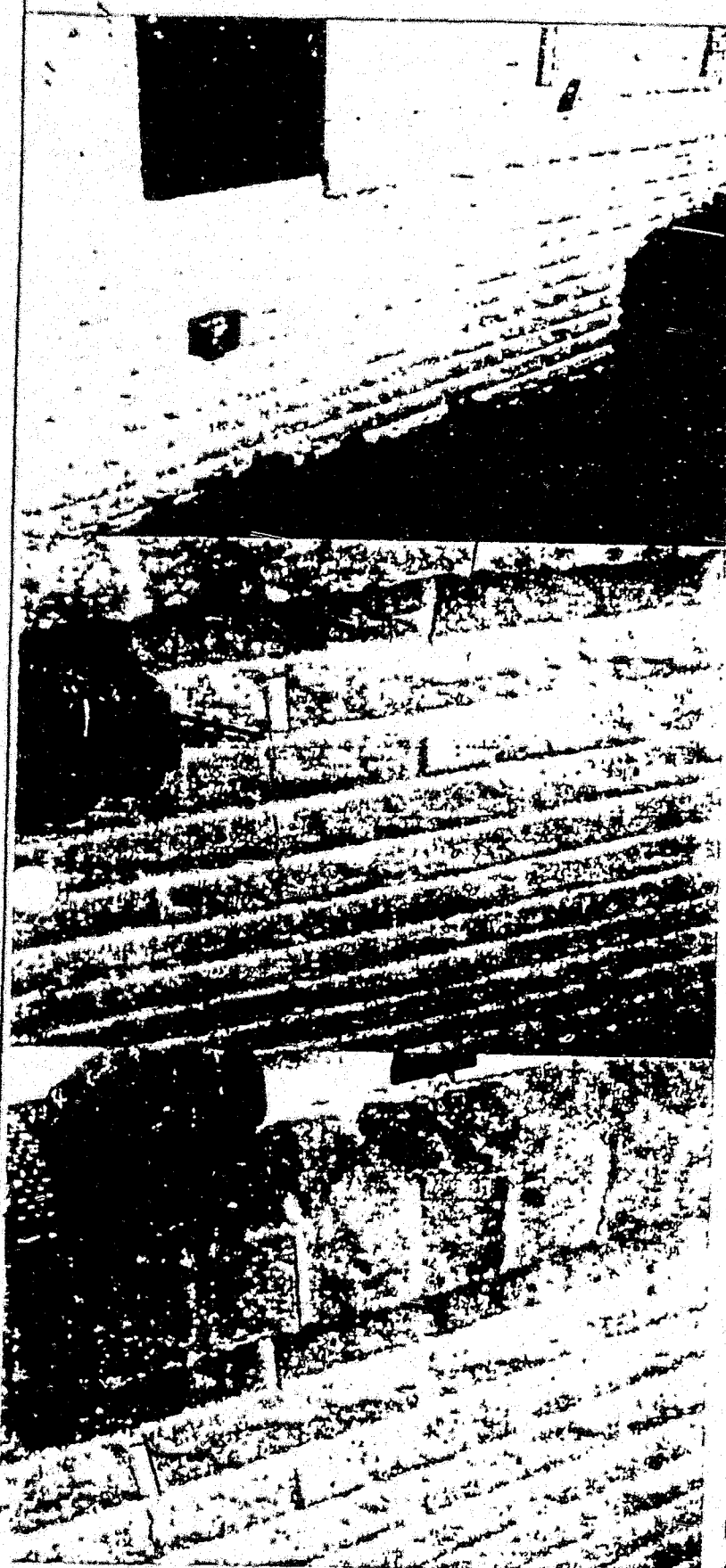
Have water company immediately install vibration isolation  
rubber pipe sections, etc. They should have done earlier.

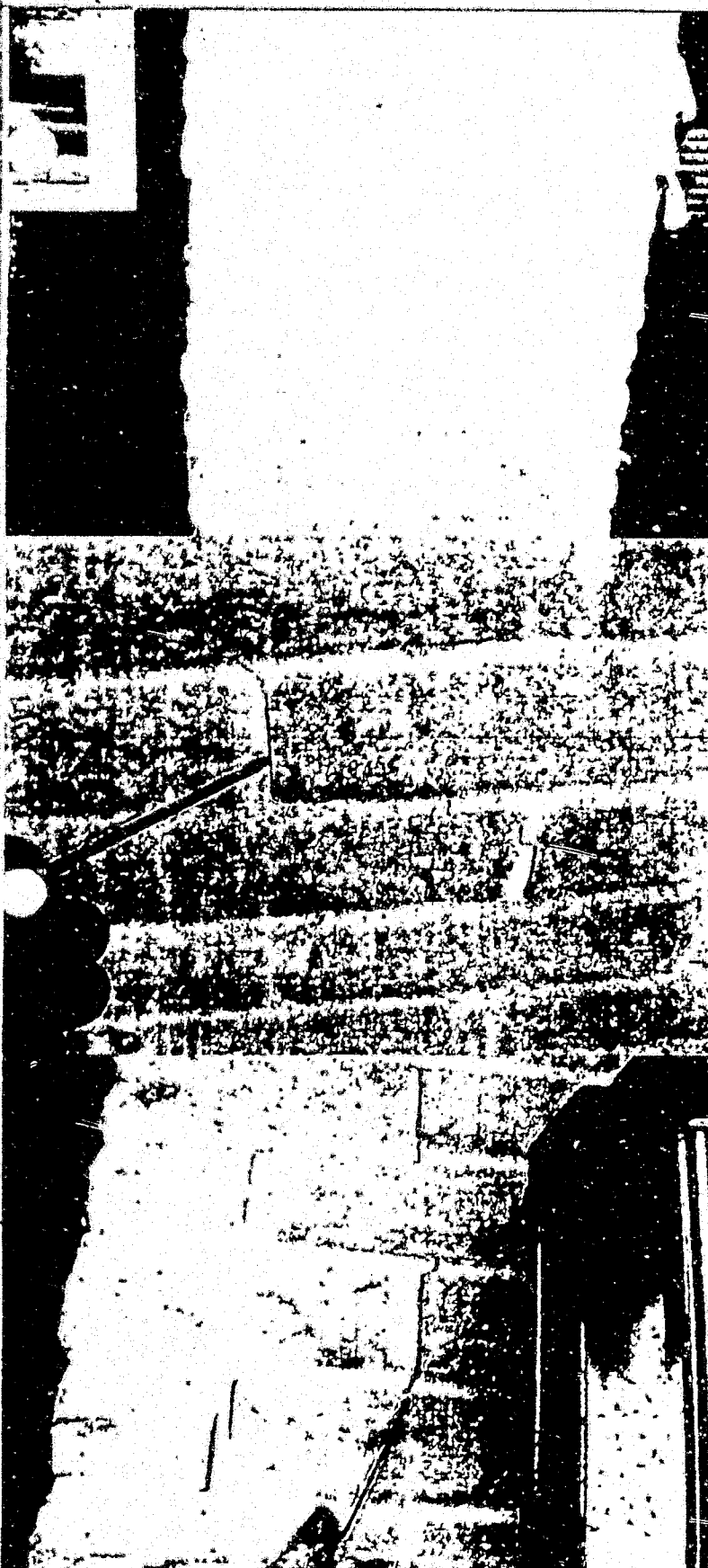
**MAINTENANCE HISTORY**

DATE \_\_\_\_\_ INITIALS \_\_\_\_\_  
ACTION TAKEN: \_\_\_\_\_

DATE \_\_\_\_\_ INITIALS \_\_\_\_\_  
ACTION TAKEN: \_\_\_\_\_

DATE \_\_\_\_\_ INITIALS \_\_\_\_\_  
ACTION TAKEN: \_\_\_\_\_





**INFRARED  
PREVENTIVE MAINTENANCE SURVEY**

*For*  
**LINDA DAVID  
ALLENTOWN, PA**

Problem # 20

DATE: September 23, 2004

MVC # 258, 259 & 260

IR # N/A

**LOCATION**

Linda David, Garage Door

**EQUIPMENT**

Vibration Analyzer-EN TEK IRD, Model 838 Analyzer,  
Electrorent 1171k53, Model 97019697, S/N 200004115  
Probe - Front Wall

**PROBLEM**

Cracks in front wall. Probably from vibration measured in house that was traced to water pumping station.

**COMMENTS / RECOMMENDATION**

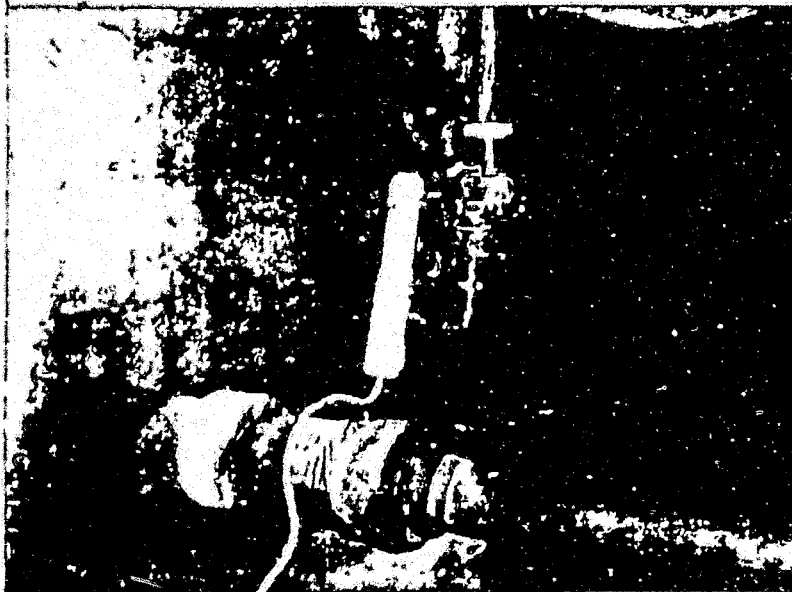
Find out why cracking.

**MAINTENANCE HISTORY**

DATE \_\_\_\_\_ INITIALS \_\_\_\_\_  
ACTION TAKEN:

DATE \_\_\_\_\_ INITIALS \_\_\_\_\_  
ACTION TAKEN:

DATE \_\_\_\_\_ INITIALS \_\_\_\_\_  
ACTION TAKEN:



NO THERMOGRAM NECESSARY

RESERVED FOR THERMOGRAM  
AFTER COMPONENT REPAIR

**INFRARED**  
PREVENTIVE MAINTENANCE SURVEY  
For  
LINDA DAVID  
ALLENTOWN, PA

Problem #: 21

DATE September 23, 2004

MVC #: 261

IR #: N/A

LOCATION

Linda David, Crawl Space

**EQUIPMENT**

Vibration Analyzer-EN TEK IRD, Model 838 Analyzer,  
Electrorent 1171k53, Model 97019697, S/N 200004115  
Probe - Water Pipe

**PROBLEM**

Magnetic field strong around pipe and traceable even on top of  
ground by PP&L's measuring device.

**COMMENTS / RECOMMENDATION**

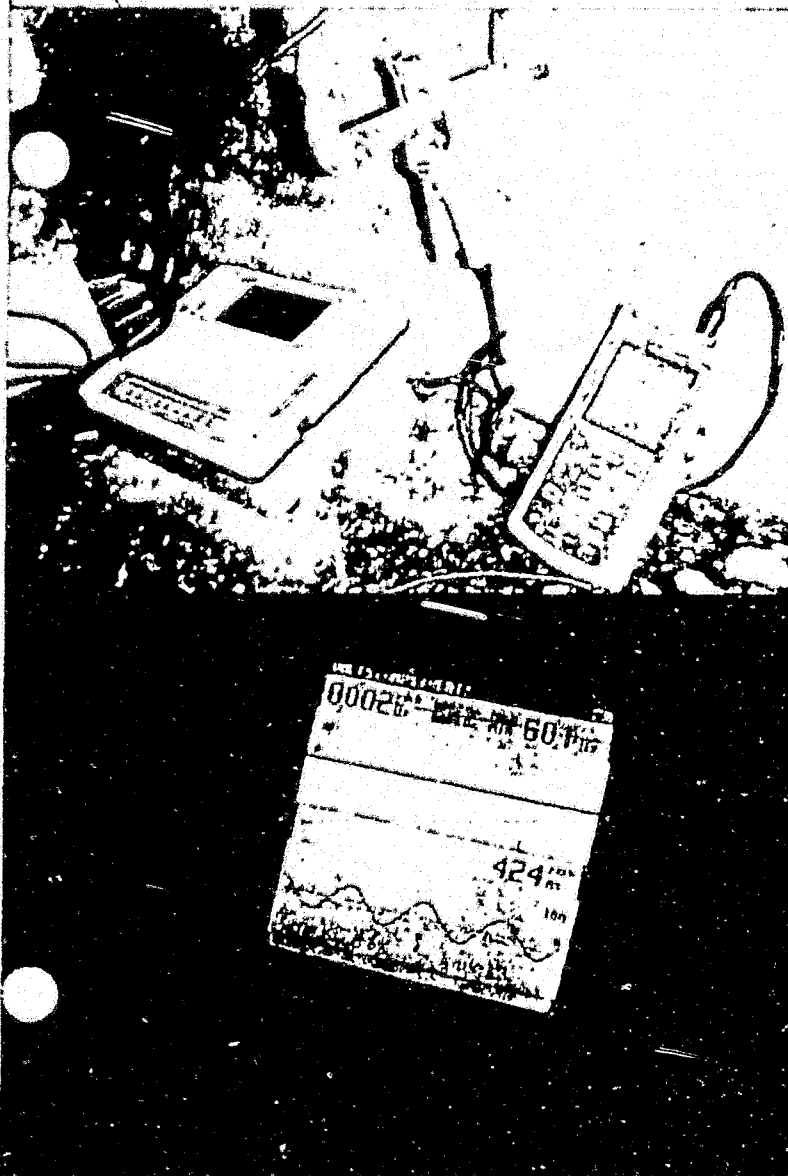
Investigate. Current through pipe documented on following  
pages.

**MAINTENANCE HISTORY**

DATE \_\_\_\_\_ INITIALS \_\_\_\_\_  
ACTION TAKEN:

DATE \_\_\_\_\_ INITIALS \_\_\_\_\_  
ACTION TAKEN:

DATE \_\_\_\_\_ INITIALS \_\_\_\_\_  
ACTION TAKEN:



**INFRARED  
PREVENTIVE MAINTENANCE SURVEY**

For  
**LINDA DAVID  
ALLENTOWN, PA**

Problem # 22

DATE: September 23, 2004

MVC # 262 & 263

IR #: N/A

**LOCATION**

Linda David, Crawl Space

**EQUIPMENT**

Vibration Analyzer-EN TEK IRD, Model 838 Analyzer,  
Electrorent 1171k53, Model 97019697, S/N 200004115  
Probe - Incoming Water Line

**PROBLEM**

4.2 amps in pipe.

**COMMENTS / RECOMMENDATION**

Current causes magnetic field that is detectable by PP&L's measuring device.

**MAINTENANCE HISTORY**

DATE \_\_\_\_\_ INITIALS \_\_\_\_\_  
ACTION TAKEN:

DATE \_\_\_\_\_ INITIALS \_\_\_\_\_  
ACTION TAKEN:

DATE \_\_\_\_\_ INITIALS \_\_\_\_\_  
ACTION TAKEN:

RESERVED FOR THERMOGRAM  
AFTER COMPONENT REPAIR



**INFRARED  
PREVENTIVE MAINTENANCE SURVEY**

For  
**LINDA DAVID  
ALLENTOWN, PA**

Problem # 23

DATE: September 23, 2004

MVC #. 264, 265 & 266 IR # N/A

LOCATION  
Linda David, Crawl Space

**EQUIPMENT**

Vibration Analyzer-EN TEK IRD, Model 838 Analyzer,  
Electrorent 1171k53, Model 97019697, S/N 200004115  
Probe

**PROBLEM**

Drove ground rods to Isolated Ground System from Other  
Houses. 230  $\Omega$  pipe. Three ground rods a total of 8 feet long  
Ground Test to New Rods Ground Current surged 2-6 amps  
during day

**COMMENTS / RECOMMENDATION**

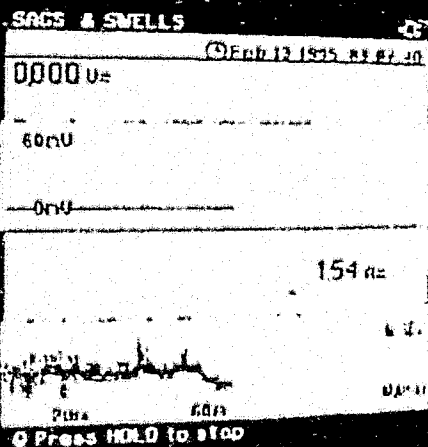
Lowered to 36 ohms using salt. Note, later drove in 3 more  
rods but couldn't get below 30 ohms.

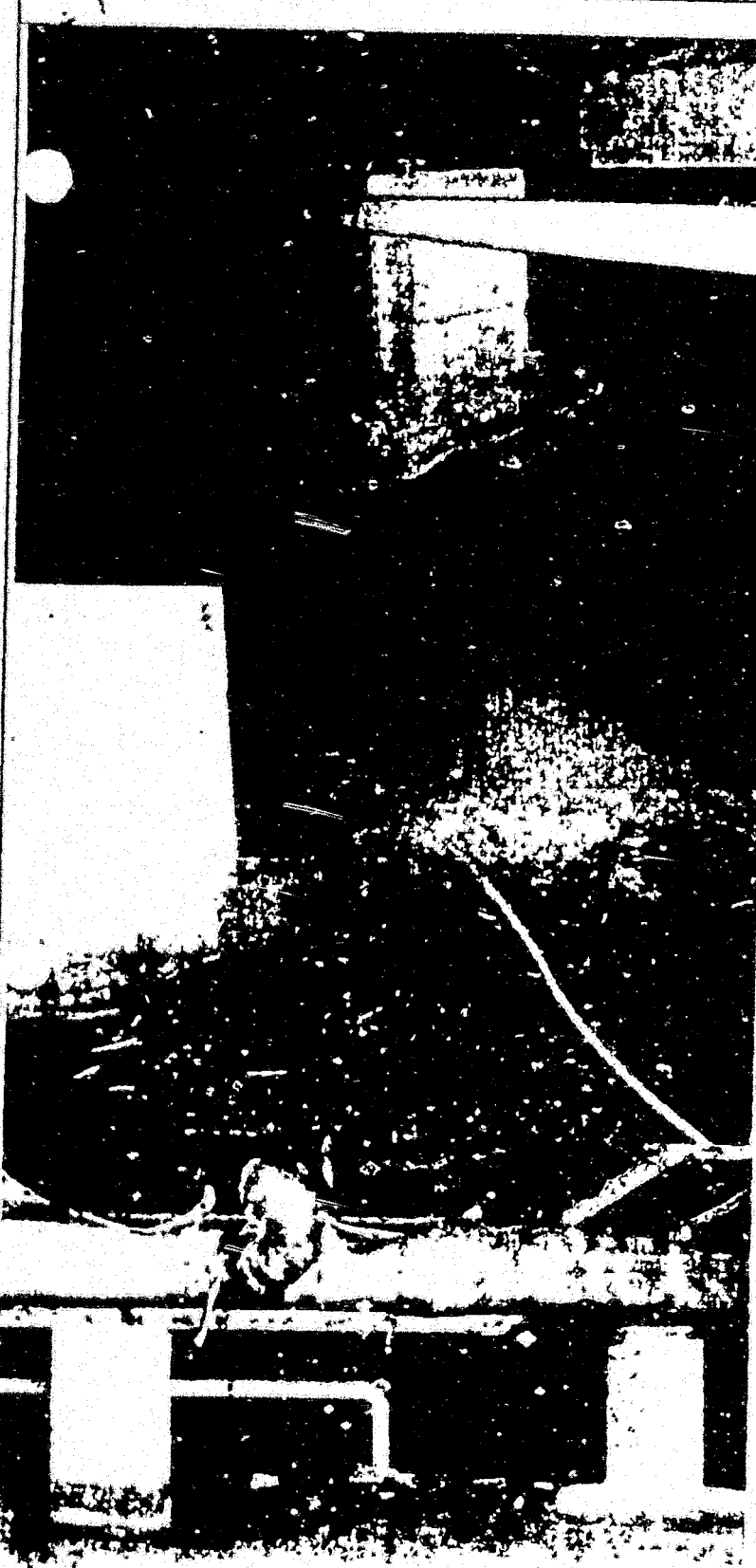
**MAINTENANCE HISTORY**

DATE \_\_\_\_\_ INITIALS \_\_\_\_\_  
ACTION TAKEN: \_\_\_\_\_

DATE \_\_\_\_\_ INITIALS \_\_\_\_\_  
ACTION TAKEN: \_\_\_\_\_

DATE \_\_\_\_\_ INITIALS \_\_\_\_\_  
ACTION TAKEN: \_\_\_\_\_





**INFRARED  
PREVENTIVE MAINTENANCE SURVEY**

*For*  
LINDA DAVID  
ALLENTOWN, PA

Problem # 24

DATE: September 23, 2004

MVC # 267

IR # N/A

LOCATION  
Linda David, Crawl Space

**EQUIPMENT**

Vibration Analyzer-EN TEK IRD, Model 838 Analyzer,  
Electrorent 1171k53, Model 97019697, S/N 200004115  
Probe - Piers Added to Floor Support

**PROBLEM**

Vibration has made owner/owners put in 150% (over double)  
the number of floor supports, but cracks continue.

**COMMENTS / RECOMMENDATION**

Other piers placed after original house construction. Notice  
"fresh" dirt and difference in foundation of piers.

**MAINTENANCE HISTORY**

DATE \_\_\_\_\_ INITIALS \_\_\_\_\_  
ACTION TAKEN:

DATE \_\_\_\_\_ INITIALS \_\_\_\_\_  
ACTION TAKEN:

DATE \_\_\_\_\_ INITIALS \_\_\_\_\_  
ACTION TAKEN:

**INFRARED  
PREVENTIVE MAINTENANCE SURVEY**

For  
**LINDA DAVID  
ALLENTOWN, PA**

Problem #: 25

DATE September 23, 2004

MVC # 498

IR # N/A

**LOCATION**

Linda David, Main Incoming Water Pipe in Crawl Space  
11.30 a.m.

**EQUIPMENT**

Clamp on Ammeter Reading-5 minutes worth of readings

**PROBLEM**

4.28 amps in water pipe Dropping to 3.72 amp minimum.

**COMMENTS / RECOMMENDATION**

See problems #21 & 22.

**MAINTENANCE HISTORY**

DATE \_\_\_\_\_ INITIALS \_\_\_\_\_  
ACTION TAKEN \_\_\_\_\_

DATE \_\_\_\_\_ INITIALS \_\_\_\_\_  
ACTION TAKEN \_\_\_\_\_

DATE \_\_\_\_\_ INITIALS \_\_\_\_\_  
ACTION TAKEN \_\_\_\_\_

NO THERMOGRAM NECESSARY

RESERVED FOR THERMOGRAM  
AFTER COMPONENT REPAIR

**INFRARED  
PREVENTIVE MAINTENANCE SURVEY**

For  
**LINDA DAVID  
ALLENTOWN, PA**

Problem # 26

DATE: September 23, 2004

MVC # 292

IR # N/A

**LOCATION**

Linda David, Main Incoming Water Pipe in Crawl Space  
11.30 a.m. - 4.00 p.m.

**EQUIPMENT**

Clamp on Ammeter Reading - 4 hours worth of readings

**PROBLEM**

6.7 amps. Maximum peak at 12:15 p.m.

**COMMENTS / RECOMMENDATION**

See problems #21 & 22.

**MAINTENANCE HISTORY**

DATE \_\_\_\_\_ INITIALS \_\_\_\_\_  
ACTION TAKEN \_\_\_\_\_

DATE \_\_\_\_\_ INITIALS \_\_\_\_\_  
ACTION TAKEN: \_\_\_\_\_

DATE \_\_\_\_\_ INITIALS \_\_\_\_\_  
ACTION TAKEN: \_\_\_\_\_

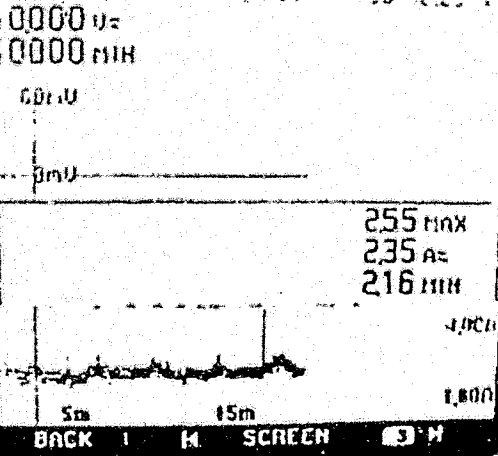
6.70 MAX  
368 n=  
260 MIN

6.1000

BACK IN GREEN FLY

NO THERMOGRAM NECESSARY

RESERVED FOR THERMOGRAM  
AFTER COMPONENT REPAIR



NO THERMOGRAM NECESSARY

RESERVED FOR THERMOGRAM  
AFTER COMPONENT REPAIR

**INFRARED  
PREVENTIVE MAINTENANCE SURVEY**

For  
**LINDA DAVID  
ALLENTOWN, PA**

Problem # 27

DATE: September 23, 2004

MVC # 293

IR # N/A

**LOCATION**

Linda David, Main Incoming Water Pipe in Crawl Space

**EQUIPMENT**

Clamp on Ammeter Reading - 15 to 20 minutes

**PROBLEM**

For 2.55 amps at about 4.00 p.m.

**COMMENTS / RECOMMENDATION**

See problems #21 & 22.

**MAINTENANCE HISTORY**

DATE \_\_\_\_\_ INITIALS \_\_\_\_\_  
ACTION TAKEN \_\_\_\_\_

DATE \_\_\_\_\_ INITIALS \_\_\_\_\_  
ACTION TAKEN \_\_\_\_\_

DATE \_\_\_\_\_ INITIALS \_\_\_\_\_  
ACTION TAKEN \_\_\_\_\_

FLUKE 02

STATS 7 SWELL

0000 MAX  
0000 U= Sep 23 2004 21:03:23  
0000 MIN

60nV

0nV

686 MAX  
361 A=  
303 MIN



### INFRARED PREVENTIVE MAINTENANCE SURVEY

For  
LINDA DAVID  
ALLENTOWN, PA

Problem # 28

DATE: September 23, 2004

MVC # 294 & 295

IR #: N/A

#### LOCATION

Linda David, Main Incoming Water Pipe in Crawl Space  
September 23 - 4:00 to 8:00 a.m. September 24

#### EQUIPMENT

Clamp on Ammeter Reading

#### PROBLEM

High of 6.86 amps at 29:03 (9:30 p.m.) September 23, 2004.

#### COMMENTS / RECOMMENDATION

See problems #21 & 22.

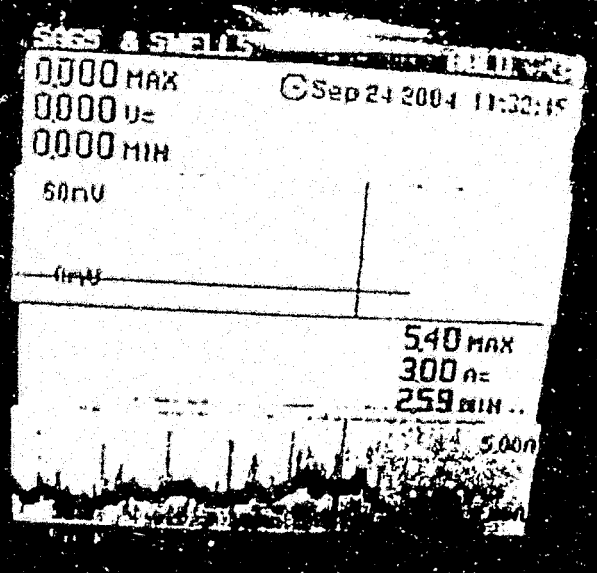
#### MAINTENANCE HISTORY

DATE \_\_\_\_\_ INITIALS \_\_\_\_\_  
ACTION TAKEN:

DATE \_\_\_\_\_ INITIALS \_\_\_\_\_  
ACTION TAKEN:

DATE \_\_\_\_\_ INITIALS \_\_\_\_\_  
ACTION TAKEN:

RESERVED FOR THERMOGRAM  
AFTER COMPONENT REPAIR



NO THERMOGRAM NECESSARY

RESERVED FOR THERMOGRAM  
AFTER COMPONENT REPAIR

**INFRARED  
PREVENTIVE MAINTENANCE SURVEY**

For  
**LINDA DAVID  
ALLENTOWN, PA**

Problem #: 29

DATE: September 24, 2004

MVC #: 296

IR #: N/A

**LOCATION**

Linda David, Main Incoming Water Pipe in Crawl Space  
Recorded from about 8:30 a.m. to 12:00 p.m.

**EQUIPMENT**

Clamp on Ammeter Reading

**PROBLEM**

High of 5.4 amps. High at about 11:30 a.m.

**COMMENTS / RECOMMENDATION**

See problems #21 & 22.

**MAINTENANCE HISTORY**

DATE \_\_\_\_\_ INITIALS \_\_\_\_\_  
ACTION TAKEN:

DATE \_\_\_\_\_ INITIALS \_\_\_\_\_  
ACTION TAKEN:

DATE \_\_\_\_\_ INITIALS \_\_\_\_\_  
ACTION TAKEN:

INFRARED  
PREVENTIVE MAINTENANCE SURVEY

For  
LINDA DAVID  
ALLENTOWN, PA

Problem # 30

DATE September 24, 2004

MVC # 297 & 298

IR # N/A

LOCATION

Linda David, Main Incoming Water Pipe in Crawl Space  
Recorded from 1:20 p.m. to 1:50 p.m.

EQUIPMENT

Clamp on Ammeter Reading

PROBLEM

1.97 amps at 1:33 p.m.

COMMENTS / RECOMMENDATION

See problem 21 & 22.

MAINTENANCE HISTORY

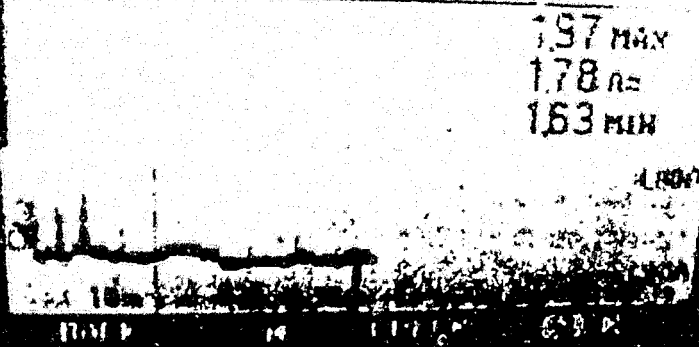
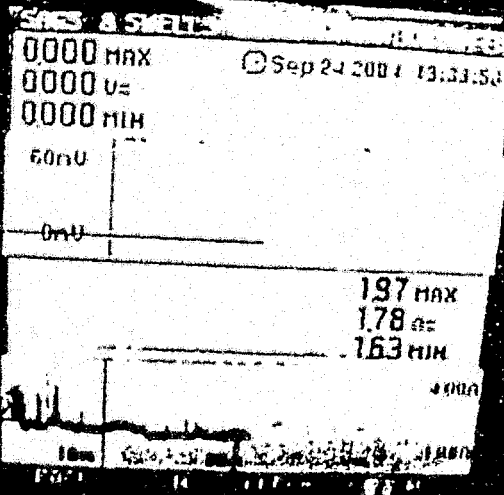
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ACTION TAKEN \_\_\_\_\_

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RESERVED FOR THERMOGRAM  
AFTER COMPONENT REPAIR



**INFRARED  
PREVENTIVE MAINTENANCE SURVEY**

For  
**LINDA DAVID  
ALLENTOWN, PA**

Problem # 31

DATE: September 24, 2004

MVC # 299

IR #: N/A

**LOCATION**

Linda David, Main Incoming Water Pipe at Meter  
9:13 a.m.

**EQUIPMENT**

Velocity Reading giving .0095 -- Peak at 1.5K and .0021 at 7.5K

**PROBLEM**

High readings of definite peaks.

**COMMENTS / RECOMMENDATION**

See problems #32 & 33. These three readings link water pumping station with house vibration. Note, went to pumping station and found pump(s) running.

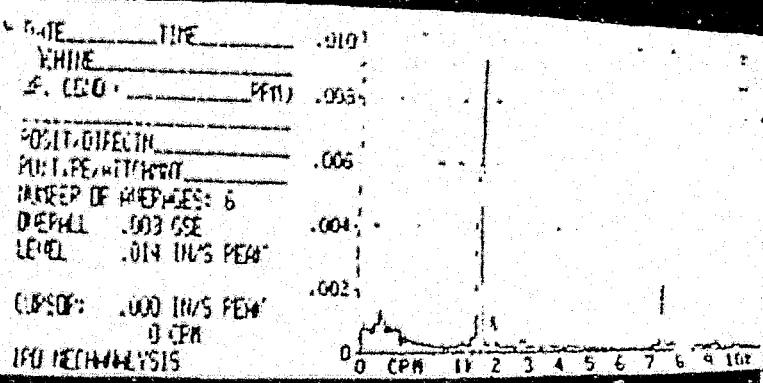
**MAINTENANCE HISTORY**

DATE \_\_\_\_\_ INITIALS \_\_\_\_\_  
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ACTION TAKEN:

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ACTION TAKEN:

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NO THERMOGRAM NECESSARY

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AFTER COMPONENT REPAIR

**INFRARED  
PREVENTIVE MAINTENANCE SURVEY**

For  
**LINDA DAVID  
ALLENTOWN, PA**

Problem # 32

DATE September 24, 2004

MVC # 300

IR # N/A

**LOCATION**

Linda David, Door of Pumping Station while Pump is running 9.32 a.m.

**EQUIPMENT**

Velocity Reading with Peak of .002 at 1.5K and .008 at 7.5K

**PROBLEM**

High readings of definite peaks which match frequencies at house.

**COMMENTS / RECOMMENDATION**

See problems #31 & 33 These three readings link water pumping station with house vibration.

**MAINTENANCE HISTORY**

DATE \_\_\_\_\_ INITIALS \_\_\_\_\_  
ACTION TAKEN \_\_\_\_\_

DATE \_\_\_\_\_ INITIALS \_\_\_\_\_  
ACTION TAKEN \_\_\_\_\_

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ACTION TAKEN \_\_\_\_\_

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SECRETARY'S BUREAU

DATE SURVEY TIME 9:32 AM 010

SCOPE \_\_\_\_\_

VELOCITY FEAT .002

VELOCITY FEAT .002

VELOCITY FEAT .002

VELOCITY FEAT .002

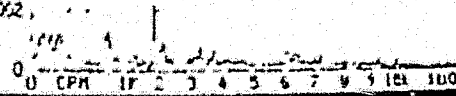
VELOCITY FEAT .002

VELOCITY FEAT .002

VELOCITY FEAT .002

VELOCITY FEAT .002

VELOCITY FEAT .002



NO THERMOGRAM NECESSARY

RESERVED FOR THERMOGRAM  
AFTER COMPONENT REPAIR



**INFRARED  
PREVENTIVE MAINTENANCE SURVEY**

For  
LINDA DAVID  
ALLENTOWN, PA

Problem #: 34

DATE September 24, 2004

MVC # 303, 304 & 305

IR # N/A

**LOCATION**

Top Graph at House Water Pipe Entering Crawl Space

**EQUIPMENT**

House Water, Manhole & Hydrant

**PROBLEM**

House vibration 5 times higher when pump running at pumping station.

**COMMENTS / RECOMMENDATION**

High house vibration.

**MAINTENANCE HISTORY**

DATE: \_\_\_\_\_ INITIALS \_\_\_\_\_

ACTION TAKEN:

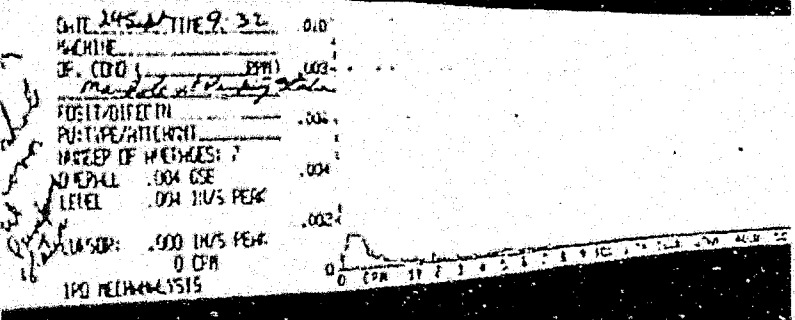
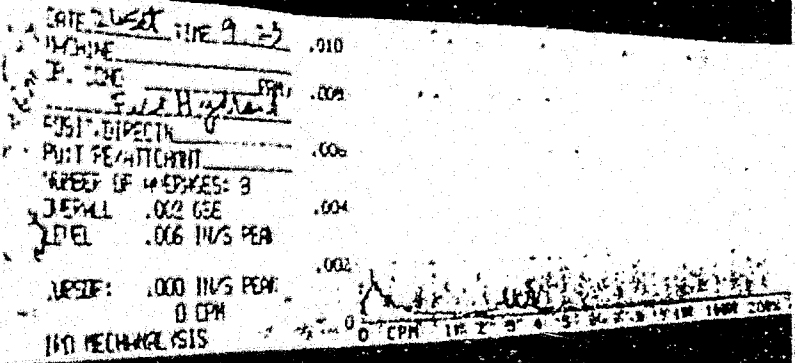
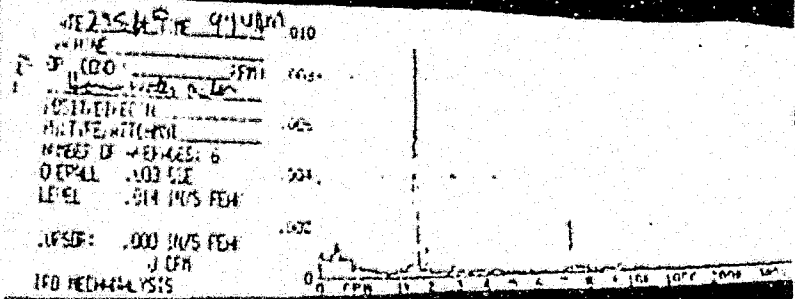
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**INFRARED  
PREVENTIVE MAINTENANCE SURVEY**

For  
**LINDA DAVID  
ALLENTOWN, PA**

Problem #: 35

DATE September 24, 2004

MVC #: 306, 307 & 308

IR #: N/A

LOCATION

Wall of pumping Station when Not Running

EQUIPMENT  
Pumping Station Door

PROBLEM

Vibration went away when not running pumps.

COMMENTS / RECOMMENDATION

Vibration low even on transformer compared to house when pump is running

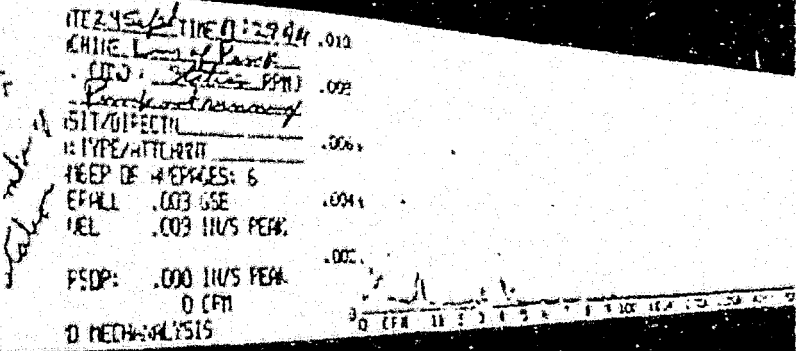
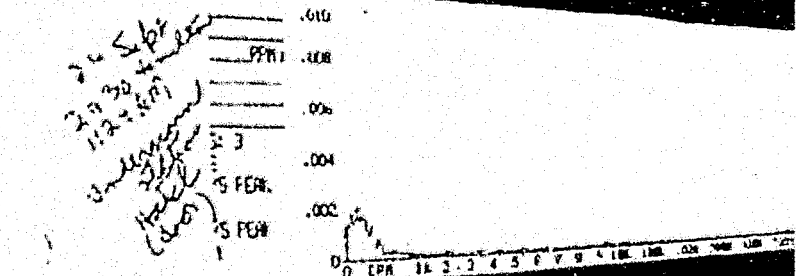
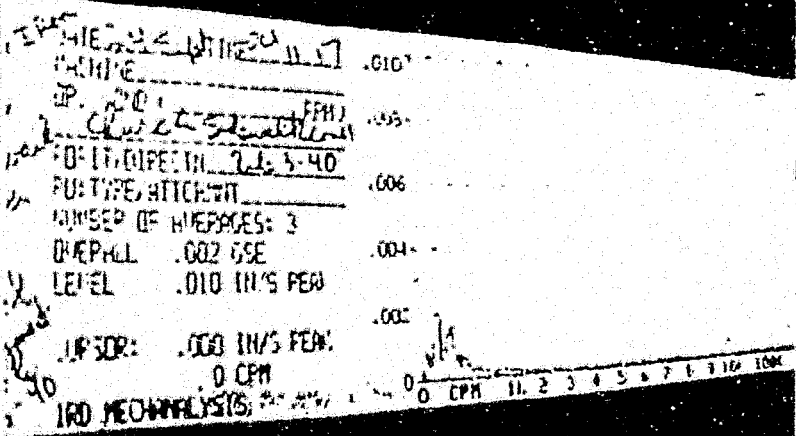
MAINTENANCE HISTORY

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ACTION TAKEN: \_\_\_\_\_

DATE: \_\_\_\_\_ INITIALS \_\_\_\_\_  
ACTION TAKEN: \_\_\_\_\_

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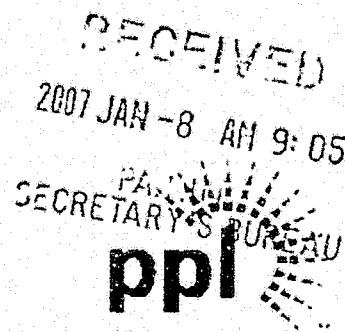
**DOCKETED**

JAN 0 8 2007

C-20055501  
11/30/06, PHILA

EXHIBIT "3-J"

PPL Electric Utilities  
827 Hausman Road  
Allentown, PA 18104-9392  
Tel: 484-634-3100 Fax: 484-634-3767  
kmreadinger@pplweb.com



June 22, 2004

Linda David  
2922 Fairview Street  
Allentown, PA 18103

Dear Ms. David,

We conducted a stray voltage investigation at your home on 6/17/04 between 1:00PM and 2:30PM. First we measured the voltage between the neutral conductor in your meter base and ground across a 500 ohm resistor and read 0.13 Volts. Next we took measurements around your home from ground to ground spaced about 6 feet apart. These also were measured across a 500 ohm resistor, as is standard practice. Included is a diagram of the measurements we found. The highest measurement was taken in your backyard between the patio and deck and was 0.0029 Volts. All of the measurements taken are very low and would not be noticeable. Typically values less than 1 Volt are not of a concern. As you can see, the measurements we found are much less than that limit.

If you have any questions concerning this report, please do not hesitate to call me at (484) 634-3100.

Thank-you.

Attachment

Sincerely,

A handwritten signature in cursive script that reads "Kristie M Readinger".

Kristie M. Readinger  
Support Engineer, Field Services



PPL Electric Utilities  
827 Hausman Road  
Allentown PA 18104-9392  
Tel 484-634-3100 Fax 484-634-3767  
kmrippke@pplweb.com



June 30, 2006

Linda David  
2922 Fairview Street  
Allentown, PA 18103

Dear Ms. David,

We conducted a stray voltage investigation at your home on 6/30/06 between 7:45 AM and 9:30 AM. First we measured the voltage between the neutral conductor in your meter base and ground (~6 feet away) across a 500 ohm resistor and read 0.0225 Volts. Next we took measurements around your home from ground to ground spaced about 6 feet apart. These also were measured across a 500 ohm resistor, as is standard practice. Included is a diagram of the measurements we found. The highest measurement was taken in your front yard across the sidewalk and was 0.0098 Volts. All of the measurements taken are very low and would not be noticeable. Typically values less than 1 Volt are not of a concern. As you can see, the measurements we found are much less than that limit.

If you have any questions concerning this report, please do not hesitate to call me at (484) 634-3100.

Thank-you.

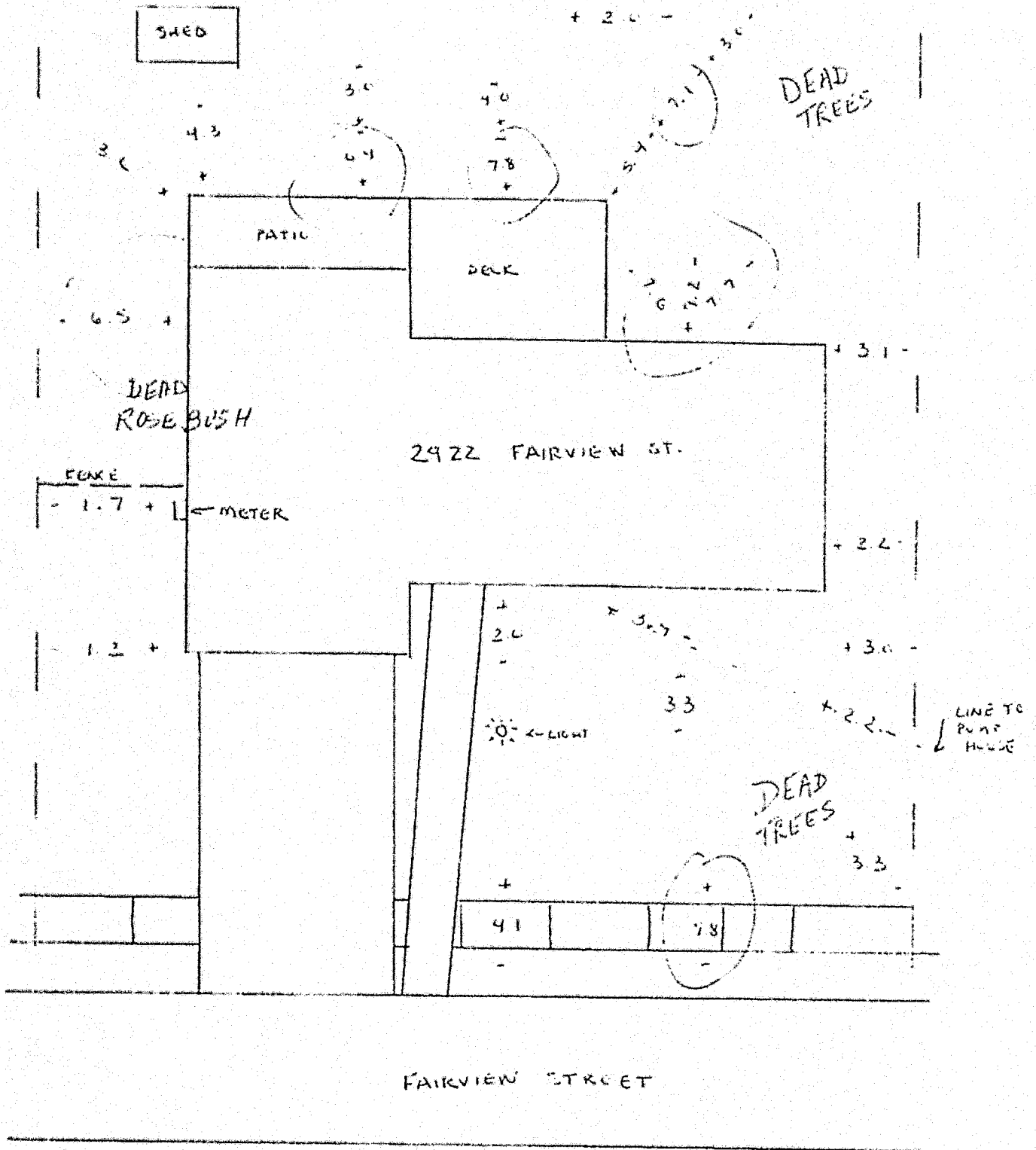
Attachment

Sincerely,

A handwritten signature in black ink that reads "Kristie M. Rippke". The signature is written in a cursive, slightly slanted style.

Kristie M. Rippke  
Support Engineer, Field Services

### Diagram of Stray Voltage Measurements Recorded 6/30/2006 at 2922 Fairview Street, Allentown



ALL MEASUREMENTS SHOWN IN MILLIVOLTS (mV).

1 VOLT = 1,000 mV

1 mV = 0.001 VOLTS

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11/30/06, PHILA

EXHIBIT "3-K"

PPL Electric Utilities  
827 Hausman Road  
Allentown, PA 18104-9392  
Tel: 484-634-3100 Fax: 484-634-3767  
kmrippke@pplweb.com



June 30, 2006

Linda David  
2922 Fairview Street  
Allentown, PA 18103

Dear Ms. David,

The attached sheet contains the location and the EMF readings taken on 6/30/06 at 2922 Fairview Street, Allentown, PA. The measurements were performed between 7:05 AM and 7:30 AM. Since magnetic field levels can change as the amount of electrical current changes, readings taken on other days or at other times on the same day may vary.

The magnetic field strength was determined using the EMDEX II measurement system. The measurements shown on the attached sheet are in milligauss (mg), or thousandths of a gauss and represent the density of the invisible magnetic lines of force present to the meter for that specific location and time. In reviewing the data provided, the highest magnetic field strength recorded at the site, 9.2 mg, was found on the inside wall near the water meter.

Scientific Panels that have reviewed the research on magnetic fields produced by power lines and appliances have drawn two main conclusions. First, additional research is needed to explore concerns raised by some of the studies, and secondly, the large body of scientific evidence does not demonstrate that magnetic fields are harmful. Given those findings, PPL is taking a reasoned approach in responding to the EMF issue. We are supporting additional research and are also reducing magnetic field levels in new power lines when it can be done at no or low cost. Additionally, when requested, we are providing information on the EMF subject to our customers and employees.

If you have any questions on the results of the measurements or need further assistance, please call me at (484) 634-3100.

Attachment

Sincerely,

Kristie M. Rippke  
Support Engineer, Field Services

# Table of EMF Measurements

For: Linda David

Site: 2922 Fairview St., Allertown

Date: 6/30/2005

Time: 7:05 AM

Location	Field Strength (mg)
Family Room	1.5
Family Room (on floor)	1.3
Kitchen	1.2
Kitchen (on floor)	1.6
Dining Room	1.3
Dining Room (on floor)	1.2
Living Room	1.7
Living Room (on floor)	1.8
Inside Wall near water meter	9.2
Back Bedroom	1.1
Back Bedroom (on floor)	1.0
Middle Bedroom	1.1
Middle Bedroom (on floor)	1.0
Bathroom	1.2
Bathroom (on floor)	0.9
Master Bedroom	1.1
Master Bedroom (on floor)	1.1
Pink Chair in Master Bedroom	0.9
Master Bathroom	1.3
Master Bathroom (on floor)	1.2
Laundry Room	1.8
Laundry Room (on floor)	1.8
Garage	2.7
Garage (on floor)	1.9
Back Deck (on loveseat)	1.1
Back Deck (on floor)	1.1
Back Yard	1.1
Back Yard (on ground)	1.0
Back Yard (top of hill)	1.3
Back Yard (top of hill on ground)	1.1
Side Yard (by Laundry Room)	1.4
Side Yard (on ground)	1.0
Front Yard	2.1
Front Yard (on ground)	2.4
Side Yard (by Bedrooms)	1.0
Side Yard (on ground)	1.0

LINDA'S ARM.

1.9

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11/30/06, PHILA

EXHIBIT 3-L

INVOICE #

ALL PHASE HOME INSPECTIONS

PO BOX 616

EMMAUS PA 18069-0616

4/18/93

# BUILDING ANALYSIS REPORT

Single Family     Detached     Semi-Detached     Townhouse     Condominium     Unit Apartment

Property Location

Client Name LINDA DAVID

19 S. 4TH ST

Address

City, State ALLENTOWN PA 18104

Telephone 740-0637

2922 FAIRVIEW ST

ALLENTOWN PA

Reported Age 20-25 YEARS

Start 10:00      End

This report is prepared for the sole use and benefit of the client, and shall not be relied upon by anyone else. Under no circumstances shall the inspection be considered for the benefit of any third party.

This is our report of a visual inspection of readily accessible areas of this building and is not intended to detect design or code compliance, nor cosmetic deficiencies. Excluded are all comments on cosmetic conditions such as painting, wallpapering or the condition of pool mastic, unless mentioned. This inspection is not intended to determine air or water quality, nor the presence or absence of or type of all insulation or of asbestos. Determining the presence or absence of lead paint, or any toxic or hazardous materials or substances, environmental hazards, rodents, insects or pests is beyond the scope and purpose of the inspection. It is limited to visual observations made of apparent conditions existing at that time and is for the purpose of alerting the client to major deficiencies which could significantly affect the value of the property. The inspection meets or exceeds the Standards of Practice of the American Society of Home Inspectors. These standards are recognized as the standards of the Home Inspection Industry. The client is urged to read the REMARKS printed on each page, an integral part of this report, and to call the undersigned at any time for explanation of any items in the report, written or printed, which are not clearly understood.

Estimates for repair costs are to be used as a guide only, and are based on current rates of professional licensed contractors. The client should understand that some contractors, repair or service firms may make misleading and or inaccurate reports of the condition of items in an effort to sell replacements which may not be needed. **Repair costs should be determined prior to closing.**

The inspection is furnished on an opinion only basis and is made in the best exercise of our ability and judgement and is made solely for the information of the client. This report is not any insurance that items found acceptable will remain so for any period of time, nor that additional defects do not exist. Furthermore, please understand that items mentioned in this report are independent of any Real Estate contracts and are not intended to imply responsibility or obligation for repairs on any parties. Some inspection components may or may not be covered by your Real Estate contract.

# BUILDING INSPECTION INSPECTION REPORT SUMMARY

INVOICE # \_\_\_\_\_

**CONDITION DEFINITIONS**  
NOTE Ages shown for components are estimated

A rating code is used to describe the apparent condition of many inspected items  
 A checkmark (✓) means only that an item was inspected or observed  
 A -- Present condition is satisfactory, average wear and tear, typical for age and type  
 B -- Present condition is marginal or aging. May need early updating  
 C -- Present condition is functional but repair or replacement is needed or advisable  
 D -- Present condition of item requires repair or replacement, non functional  
 N A -- Not applicable or not inspected due to conditions  
 N V -- Not visible or not readable  
 N D -- Not DETERMINED

**PRIORITY DEFINITIONS**

A priority method is used to help the client determine the repairs that should be performed first, in our opinion. Priority:  
 1. Condition should be repaired immediately, possible danger to health, safety or the condition of the building may deteriorate further.  
 2. Condition is not adequate. Repair or replace before condition deteriorates further  
 3. Condition is not suitable but little change will be noticed if not corrected immediately  
 4. Condition indicates repair of correction is desirable but not mandatory. Items functional but, utility or appearance are reduced

**STRUCTURAL OVERVIEW**

The following conditions were observed during our visual inspection, and based on our opinion appear to be as follows.

<b>Construction</b>	<b>Maintenance</b>	<b>Wear and Tear</b>	<b>Signs of Settlement</b>	<b>Normal Cracks</b>	<b>Termites or Wood Decay Found*</b>
✓ Professional/ Workmanlike	✓ Very Good	✓ Minor	✓ Minor	Foundation	None Found
✓ Quality Built	Average	Average	Average	Ext Walls	Minor Damage
Average Const	Fair	Above Avg	Above Avg	Int Walls	Moderate Damage
Amateur Workmanship	Neglected	Extensive	Extensive	Concrete Firs	Major Damage
				Walks/Drives	

\*The presence or absence of termites, wood borers, carpenter ants, fire ants, bees, rodents, insects or pests is not a part of this inspection

MAJOR REPAIRS

Page 5 Repair or Replace Roof

Recommend review and repair as required by qualified licensed contractor prior to closing. Costs of \$1000.00 or more each

Priority Estimates

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JAN 08 2007

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11/30/06, PHILA

**EXHIBIT "3-M"**

# Reimer Associates, Inc.

PROFESSIONAL ENGINEERS  
*Structural - Civil*

August 1, 2004

Linda David  
2922 W. Fairview Street  
Allentown, PA 18103

Reference: House Vibrations

Dear Linda:

I have received from you the April 15, 2004 letter from Steve Henning of the Pidcock Company to Mr. Alan A. Loch. The letter was in response to a report dated February 18, 2004, a copy of which I do not have. I also received from you a single sheet labeled as "the page missing from the Environmental Assessment". I also am not in possession of the Environmental Assessment. In any case, the page deals with electrical issues of which I cannot claim any expertise. Other than the two items (All Phase Home Inspections -1993 and Raymond C. Geiger - sketch floor plan) referenced in my letter of October 6, 2003, I have not seen any of these other reports referenced and am not aware of any that may not be referenced. All of the information should be made available to anyone working on the matter.

On the issue of structural vibrations, I suggest the installation of continuously acting recording gages (such as seismographs) be set up at selected locations in your house. With these recording gages, it should become clear if structural vibrations are being transmitted from the activity in the pump house. Once the background activity is established, the times of starting and stopping the pumps singly or in combinations should be discernible if this is truly the cause of your problems. On my two daytime visits to your house, I personally have not felt the vibrations. A professional testing company with the proper sophisticated equipment will have to be employed to formally document the vibrations and make the determination. Cooperation and coordination with the Township Authority will need to be sought to compare the pump operations with the recording information. Since you also complain of the noise level, this should also be monitored simultaneously from several locations. The electrical fields should also be monitored and coordinated with the above information and testing. Information on air quality and air-borne particulates should also be collected.

Since you seem reluctant to bear the cost of this type of testing program, perhaps your attorney can make overtures to the Water Authority to assist with the cost. There is some risk in this in that if nothing can be found, they may want you to pay for all the testing. However, they should be as interested in proving there is no effect at your house from the pump station as you are interested in proving there is. That is why an independent and certified testing company with qualified personnel is very important..

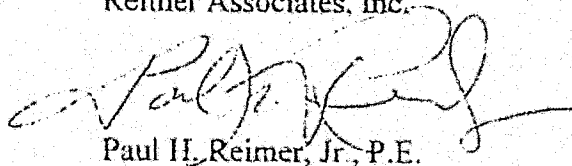
PMB #207  
3140-B Tilghman Street  
Allentown, PA 18104-4268

610-395-4849  
FAX 610-395-5299

Geotechnical investigations may also be warranted to determine soil types, depth to bedrock, vibration transmissibility, etc., between the pump house and your house. /1

This appears to have become much more than a structural issue with the house and the proximity of the pump station. Although some cracking has appeared (and should be carefully documented for trial) the I believe, within the bounds of reasonable engineering certainty, that the overall structural integrity of the house had not been adversely affected as of the time of my last site visit on May 12, 2004.

Sincerely yours,  
Reimer Associates, Inc.

A handwritten signature in black ink, appearing to read "Paul H. Reimer, Jr.", written over a horizontal line.

Paul H. Reimer, Jr., P.E.

PHR/pr  
david-02.wps(7a)

xc: Attorney Louisa Chen  
White & Williams LLP  
Suite 1800  
One Liberty Place  
Philadelphia, PA 19103-7395

Rocket # C-20055501

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JAN 08 2007

SECRETARY OF DEFENSE

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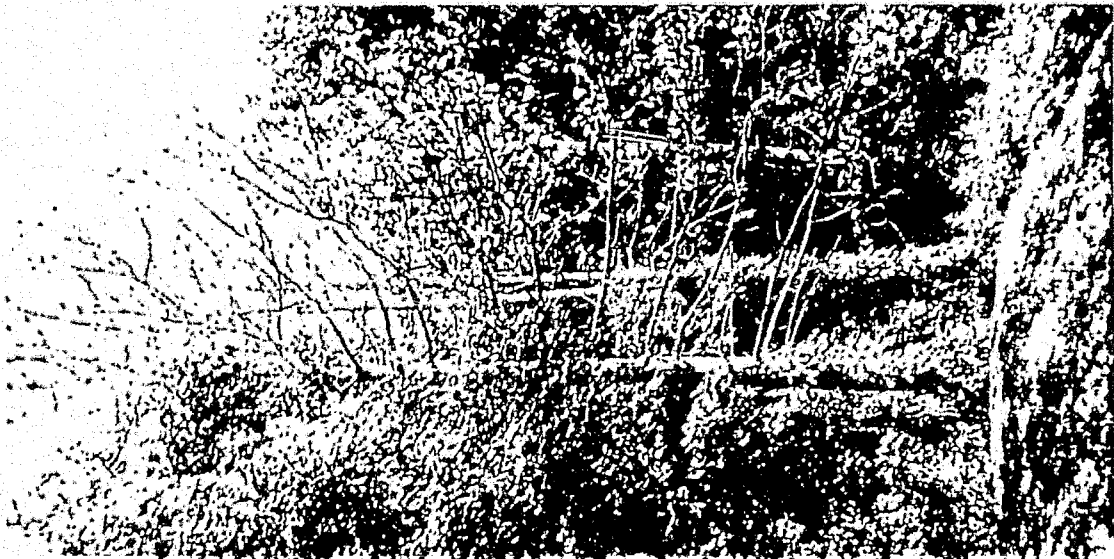
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Exhibit 4 - A  
                  - B  
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11/30/06, PHILA

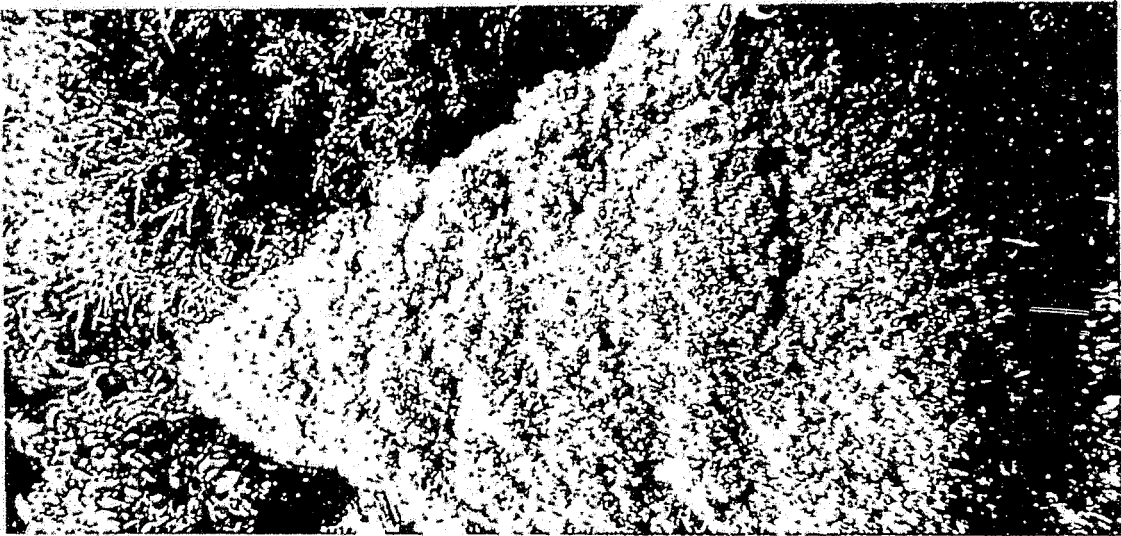


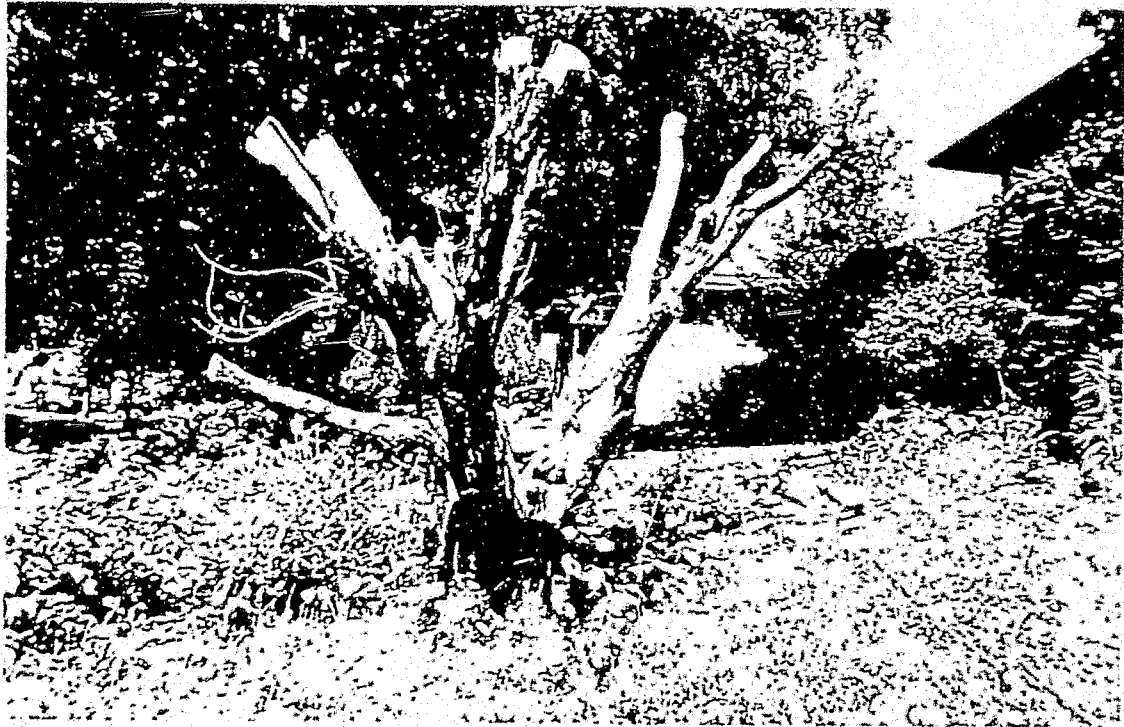
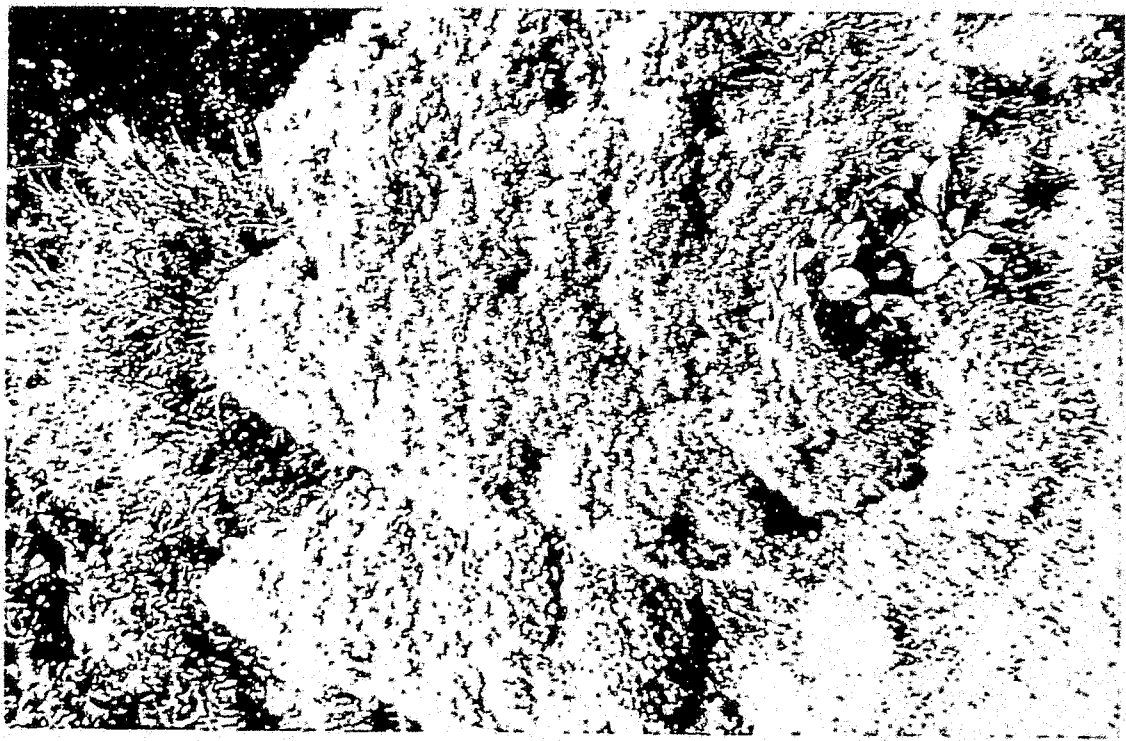
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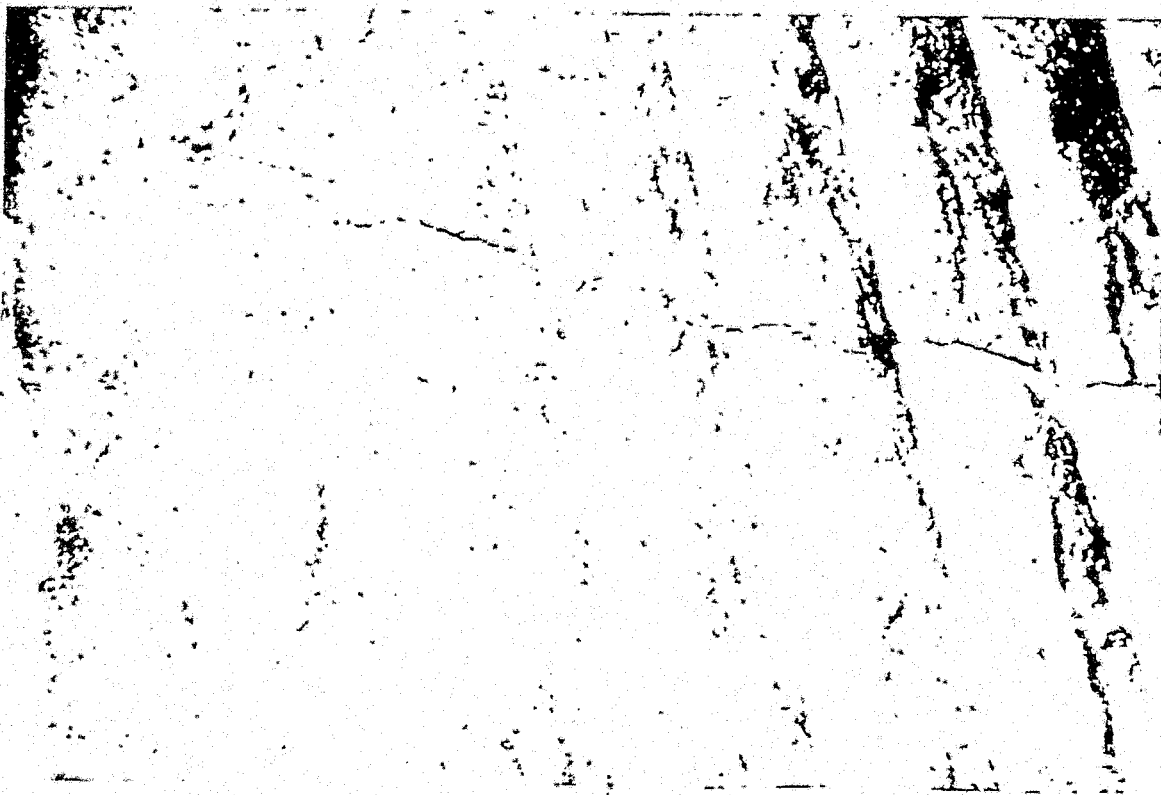


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**OVER SIZED DOCUMENTS**

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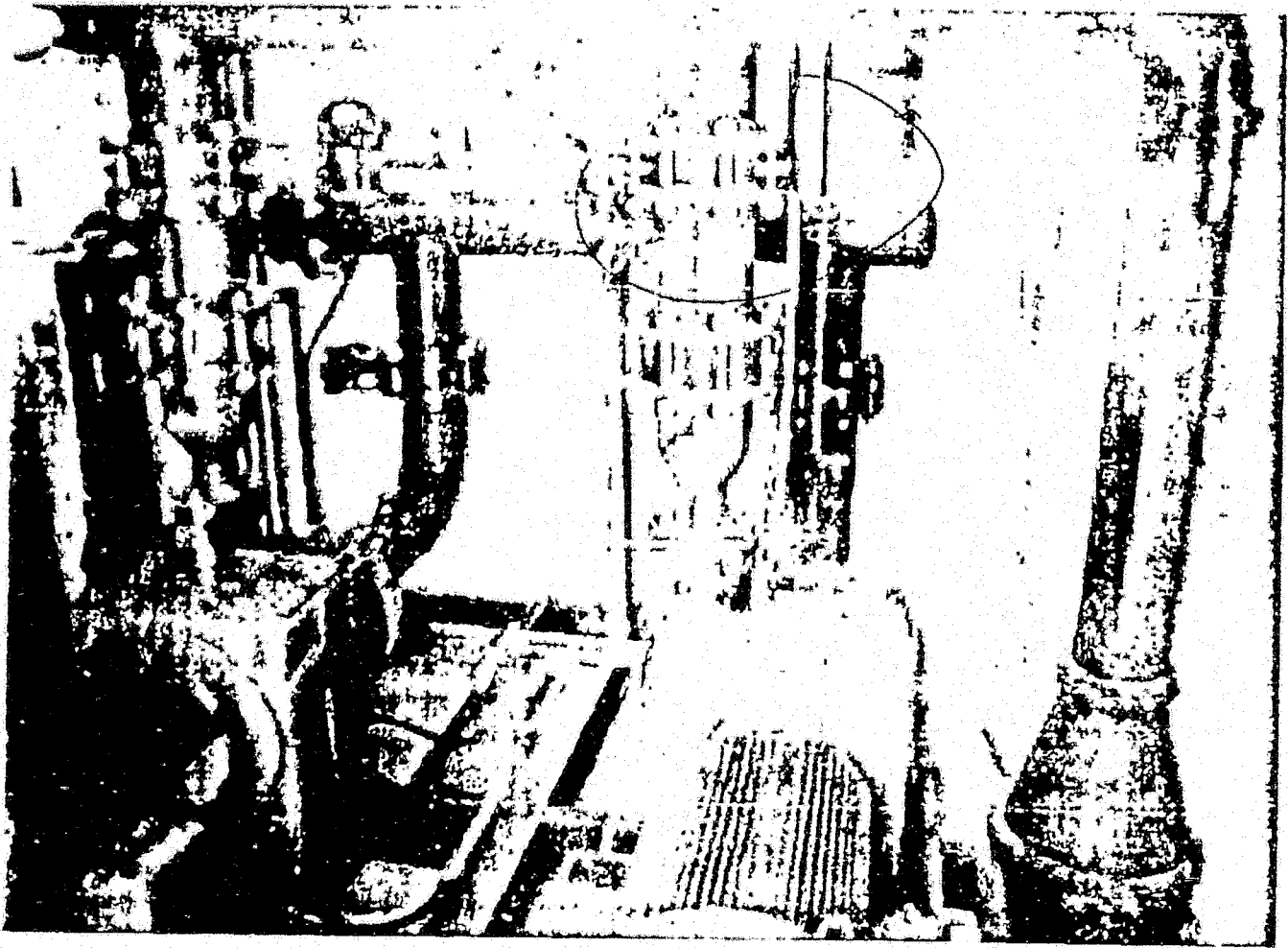
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JAN 0 8 2007

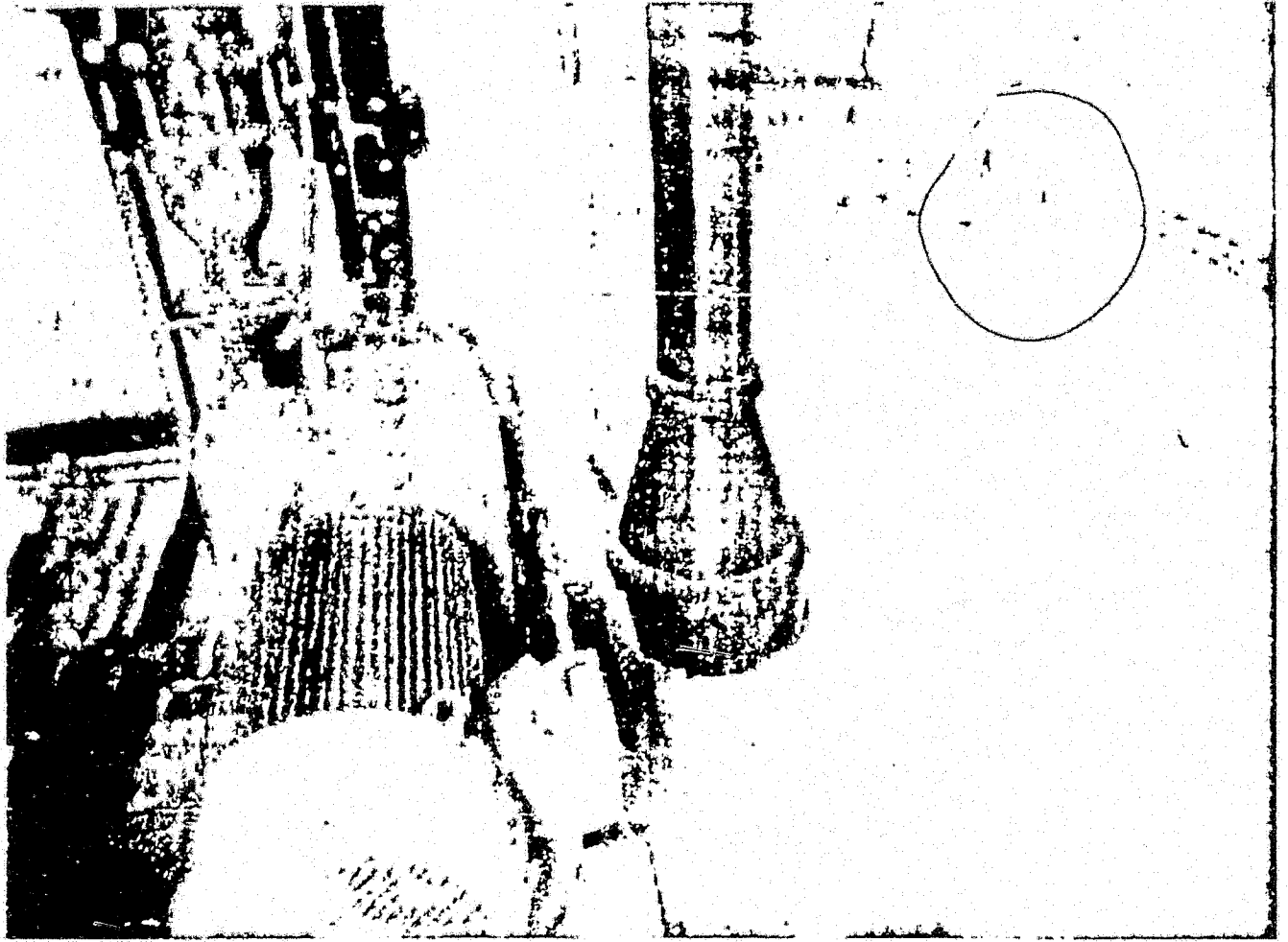
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11/30/06, PHILA

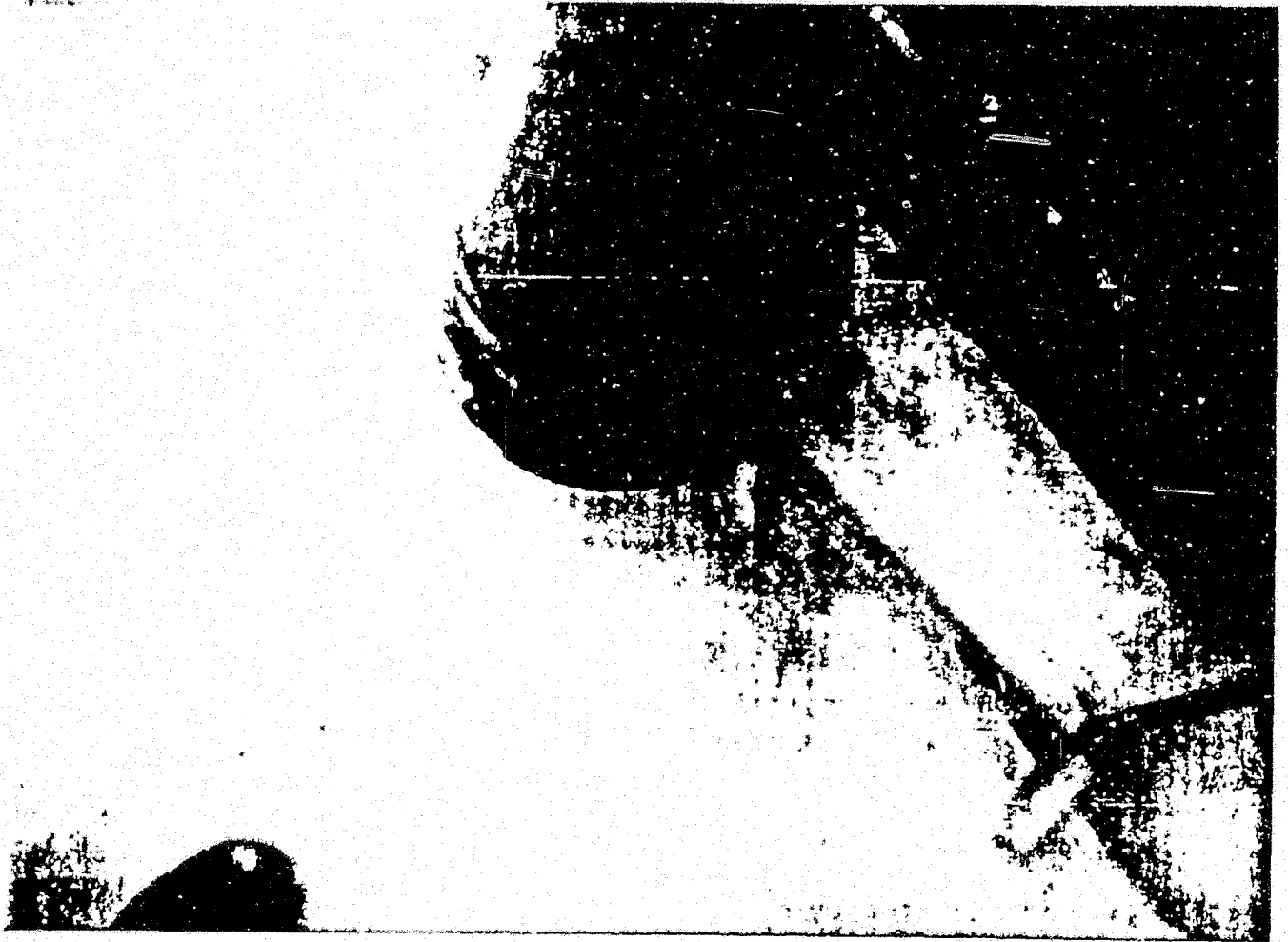
EXHIBIT "4-D"

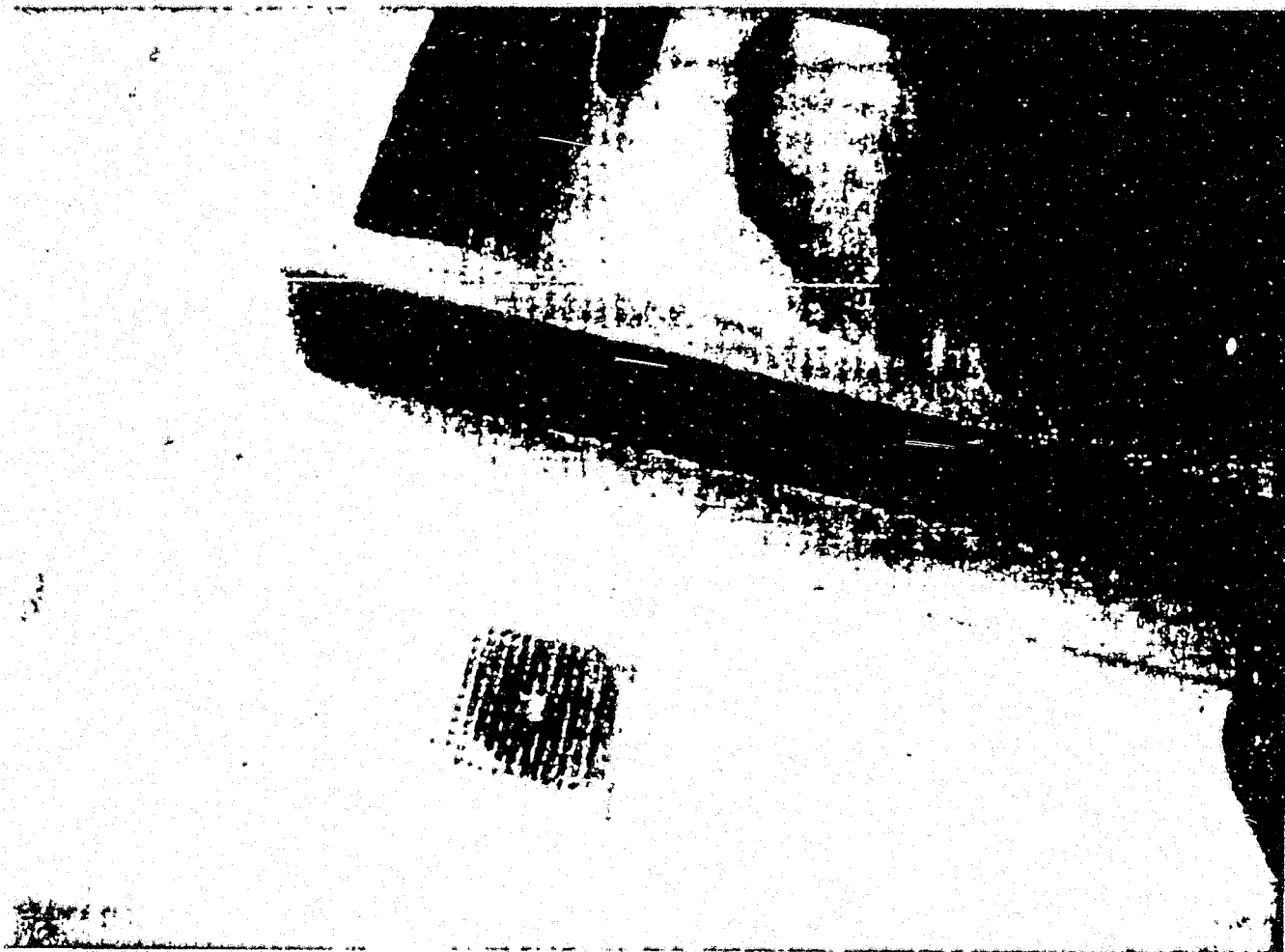


4-D

South Whitehall's pumps  
No insulation pads  
No sound isolators  
No springs, clamps, or  
other devices to control  
vibrations!







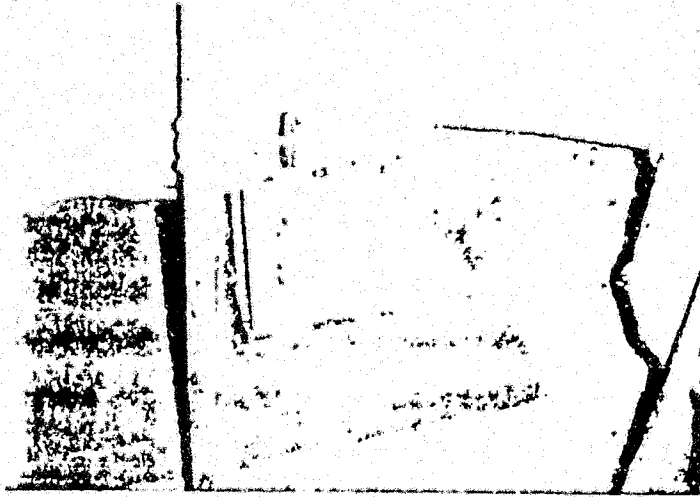
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F.A.P.U.C.  
SECRETARY'S BUREAU

DOCUMENT  
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JAN 0 8 2007

C-20055501  
11/30/06, PHILA

**EXHIBIT "4-E"**



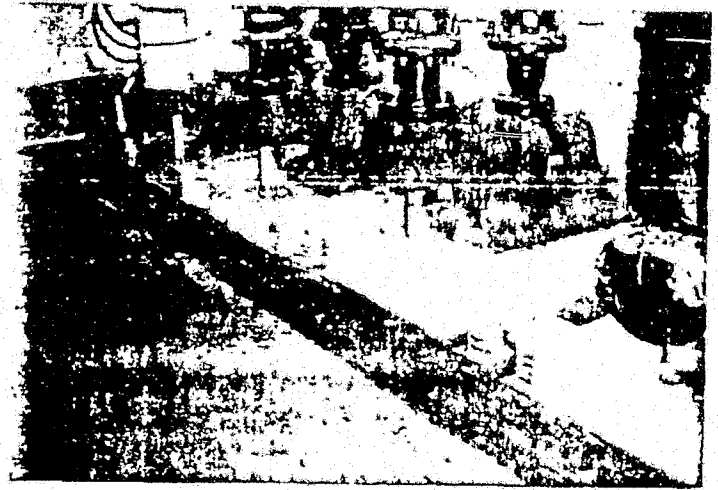
Normally such sound isolation devices are installed on pumps located near houses



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



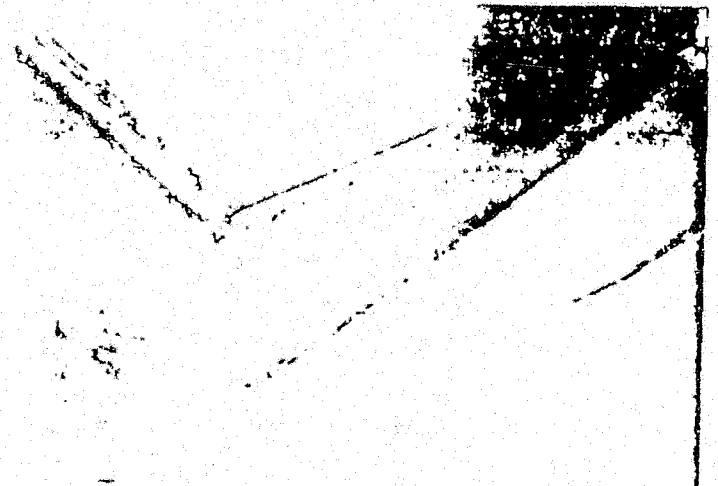
Normally such sound isolation devices are installed on pumps located near houses



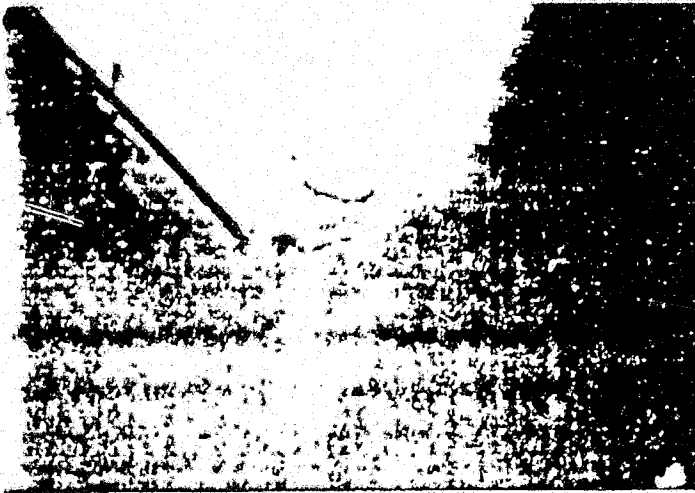
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Normally such sound isolation devices are installed on pumps located near houses



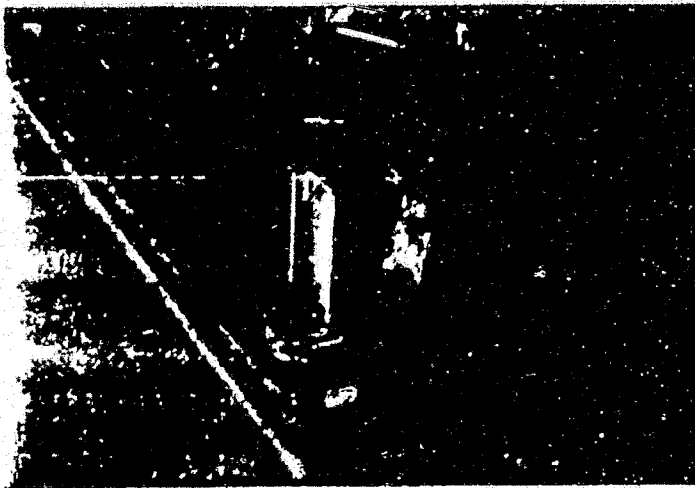
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Normally such sound isolation devices are installed on pumps located near houses



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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EXHIBIT "5-A"

LINDA L. DAVID

2922 WEST FAIRVIEW STREET  
ALLENTOWN, PA 18103

610 - 740 - 0637

April 8, 2004

Morning Call  
6th Street  
Allentown, PA 18102

ATT: Letter to the Editor

Re: Customer Service

Recently, ever since January 2004, vibrations and electrical impulses coming into my house have made living in my home a nightmare. In an effort to have someone take care of the problem, I've called many people trying to find the source and get help.

Here are a few comments from customer service workers and elected public officials:

- PPL—"You'll have to investigate this on your own."
- South Whitehall Township Office—When asked if someone could come to evaluate the problem the official said "Too busy."
- State Health Department of Lehigh County—"Call your local authority." This public servant actually hung up the phone before I was finished speaking with her.

The new water pumps (3) placed behind the Veterans' Clinic on Hamilton Boulevard are the culprits. To me, someone forgot to do their homework as far as assessing the structure of nearby homes and taking important steps to sound isolate the pumps and install an insulation pad.

Two reading sources regarding the issues affecting me are:

The Electrical Sensitivity Handbook:

How Electromagnetic Fields Are Making People Sick  
by Lucinda Grant, 1995

Cross Currents, The Perils of Electropollution, The Promise of Electromedicine  
by Robert Becker, M.D., 1990

Thanks to the CEO of the Veterans' Clinic who was willing to call the property manager. Thanks to the Allentown Water Department. When called, they came within ten minutes to check for leaks.

Customer service for some public works is just what they do; for others, it's pass the buck and blame someone else. Most disgusting!

*Linda L. David*

Linda David  
Allentown

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11/30/06, PHILA

EXHIBIT *5-B* 

White and Williams LLP



1800 One Liberty Place  
Philadelphia, PA 19103-7395  
Phone 215.864.7000  
Fax 215.864.7123

Louisa T. Chen  
Direct Dial 215.864.6399  
Direct Fax 215.789.6665  
chenl@whiteandwilliams.com

NO RESPONSE  
TO MY KNOWLEDGE

February 15, 2005

The Pidcock Company  
Attn: Steven Henning, P.E.  
Manager of Environmental Division  
Oxford Drive at Fish Hatchery Road  
2451 Parkwood Drive  
Allentown, PA 18103-9608

Mr. Thomas Uff  
South Whitehall Township Water Authority  
4444 Walbert Avenue  
Allentown, PA 18104-1699

**RE: Linda David's Claim at South Whitehall Township Authority**  
**Hamilton Boulevard Booster Pump Station**

Dear Gentlemen:

Please be advised that my firm represents Linda David for personal injuries and property damage she sustained as a result of the vibration originating from the above-referenced facility.

I understand that Mr. Alan A. Loch from Trinity Associates has sent you earlier reports documenting the damage to Ms. David's home. Enclosed please find Mr. Loch's latest vibration analysis report performed in September, 2004. The report states that the vibration readings in Ms. David's home duplicate the vibration readings at the water station.

Please be advised that I am prepared to bring action against you on behalf of my client. Please review Mr. Loch's report and forward this letter and report to your insurance company. Please have a claim representative contact me. If I do not hear from you within the next two weeks, I will file suit. Thank you.

Very truly yours,

WHITE AND WILLIAMS LLP

By: Louisa T. Chen

LTC:bh  
Enclosure

Allentown, PA • Berwyn, PA • Cherry Hill, NJ • New York, NY  
Paramus, NJ • Philadelphia, PA • Pittsburgh, PA • Wilmington, DE

DOCS PH1792284v1

Attorney kept my papers for 10 mos. and then dropped the case.

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11/30/06, PHILA

**EXHIBIT "5-C"**

2922 W. FAIRVIEW ST  
ALLENTOWN, PA 18103  
JUNE 12, 2006

WHITE AND WILLIAMS LLP  
1300 ONE LIBERTY PLACE  
PHILADELPHIA, PA 19103-7395

DEAR LOUISA,

I HAVE RECEIVED THE PAPERS SENT TO YOU (IN (ERROR)! INTERESTING, TO SAY THE LEAST, SINCE YOU ALREADY TOLD EVERYONE YOU WOULD NOT TAKE THIS CASE TO COURT!!

YES, I FILED A COMPLAINT WITH THE PUC. IT SHOULD HAVE BEEN DONE A YEAR AGO!! GLAD A GOOD LAWYER WAS NOT NEEDED, NOR A CROOKED ONE-FOR THAT MATTER!

WE HAD A PHONE CONFERENCE CALL. A SECOND ONE IS SCHEDULED, AND A HEARING WILL FOLLOW. <sup>ENCE</sup>

EVERYONE IS TRYING TO GET IT DISMISSED. THE JUDGE SAID, "NO!"

I WAS AWARE THAT THE PICTURES OF THE PUMPS WERE MISSING FROM THE PAPERS YOU RETURNED TO ME. THE NEXT "ENVIRONMENTAL" LAWYER TRIED TO SMEAR AND RUIN THE PHOTOS. I SENT THOSE TO THE PUC, AS WELL AS A NEW SET. THANK GOODNESS FOR DIGITAL TECHNOLOGY!

ALL OF A SUDDEN, VIBRATIONS AND ELECTRICAL SURGES HAVE BEEN TONED DOWN IN THE DAYTIME HOURS. IT IS STILL AWFUL AT NIGHT. HOUSE STILL SHAKES AND CRACKS. AND NO, THESE CRACKS ARE NOT NORMAL!!

THERE ARE NOW THREE DEAD PINE TREES IN LINE WITH THE TRANSFORMER POLE, AND A DEAD MAPLE TREE IN LINE WITH THE PUMPING STATION HAD TO BE CUT DOWN. SMALL JAPANESE PINES ARE DYING AND THE JAPANESE CHERRY TREE IN THE FRONT YARD.

I HAVE LEARNED THAT TRUTH AND HONESTY ARE NOT FOUND IN GOVERNMENT, BIG BUSINESSES, NOR IN LAW FIRMS. HELL IS GOING TO BE A HUGE PLACE!!

LINDA L. DAVID

*Linda L. David*

*P.S. - Wonder where all of the papers are that you and your "expert" engineer copied while here at my home? Don't bother to answer; I know exactly where they are!*

*AFTER  
2 1/2  
YEARS*

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**EXHIBIT "5-D"**

PENNSYLVANIA PUBLIC UTILITY COMMISSION

Formal Complaint Form

RECEIVED

Please print or type.

C-20055501

OCT 26 2005

1. CUSTOMER NAME (COMPLAINANT)

PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

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

Name LINDA L. DAVID

Street/P.O. Box 2922 W. FAIRVIEW ST. Apt #

City ALLENTOWN State PA Zip 18103

County LEHIGH

Area Code/HOME Phone 610-740-0637

Area Code/WORK Phone Retired Teacher

Utility Account Number 59690-09000  
(from your bill)

ORIGINAL

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 \_\_\_\_\_

SECRETARY'S BUREAU  
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2. UTILITY NAME (RESPONDENT)

Name of utility company your complaint concerns: PPL

3. TYPE OF UTILITY (check one)

ELECTRIC

STEAM HEAT

GAS

WASTE WATER

WATER

MOTOR CARRIER

TELEPHONE  
(local, long distance)

(taxi, moving company, limousine)

SOUTH WHITEHALL TOWNSHIP

ALLENTOWN WATER AUTHORITY

50

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.  
(explain)

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.

A water pumping station has been placed 200' from my home. Vibrations can be felt through the furniture, and electrical impulses. Pumps are not insulated!! 6 AMPS of electricity are running in water pipes. Had private testing done by an electrical engineer

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

Someone needs to have the judicial authority to have the township (South Whitehall) and PPL correct the amount of electricity running in the water pipes. Water pumps need to be insulated! One pump runs during the day - vibrations, then, are minimal. Three pumps run after midnight. That's when the awakened and burn

burn marks just from sleeping in my own bed.

6. PROTECTION FROM ABUSE

Answer the following question if your complaint is against a natural gas distribution company, an electric distribution company or a water company AND your complaint is about a billing problem, an application for service problem, a termination of service problem or a request for a payment agreement.

Has a court granted a "Protection from Abuse" order for your personal safety?

YES

NO

7. PRIOR UTILITY CONTACT

Answer the following question only if you are a residential customer and your complaint is against an electric distribution utility, natural gas distribution utility or a water distribution utility.

Have you spoken to a utility company representative about this complaint?

YES

(includes appeals of BCS determinations)

NO

If you tried to, but could not speak to a utility company representative about your complaint, please explain why.

8. VERIFICATION AND SIGNATURE

You must print or type your name below on the line provided for the verification paragraph, and you must sign and date (in ink) this form on the lines provided.

Verification:

I LINDA DAVID, hereby state that the facts above set forth are true and correct (or 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 the statements herein are made subject to the penalties of 18 Pa. C.S. § 4904 (relating to unsworn falsification to authorities).

Linda L. David  
(Signature)

Oct. 18 2005  
(Date)

**DOCKETED**  
JAN 08 2007

DEPOSITION OF LINDA L DAVID

AUG 28, 2006

LINDA L. DAVID vs. PPL CORP., CITY OF ALLENTOWN WATER DEPT., AND SOUTH WHITEHALL AUTHORITY

WITNESSES FOR LINDA L. DAVID

ALAN LOCH, ELECTRICAL ENGINEER  
DOLORES A. MILLER, SISTER

DOCKET #  
C-20055501

C-20055501  
11/30/06, PHILA

TOPIC/EXHIBIT

SUMMARY

SWEARING IN AT FIRST CONFERENCE CALL - MAY 10, 2006

LINDA L. DAVID, DULY SWORN, TESTIFIES AS FOLLOWS:

BACKGROUND

EXHIBIT 1 -DEED

HOUSE WAS PURCHASED IN 1993 -DEED BOOK VOLUME 1337, P.408

EXHIBIT 2 -MAP OF DEVELOPMENT

HOUSE WAS BUILT IN 1973 AT 2922 W. FAIRVIEW ST., ALLENTOWN, PA 18103,  
"WEST HILL TERRACE".

STRUCTURAL CONCERNS

EXHIBIT 3 - FOLDER OF TESTS

EXHIBIT 4-A  
EXHIBIT 3-A

IN 2003 VIBRATIONS WERE FELT IN THE FLOORS OF THE HOUSE.  
CRACKS APPEARED IN CEILINGS AND WALLS; SOME WERE NEW; OLDER  
CRACKS GOT BIGGER. PAUL REIMER, STRUCTURAL ENGINEER, WAS  
CALLED TO EVALUATE. REPAIRS TO THE ATTIC (KNEE-WALL) AND SHIMS  
TO THE SUPPORT BEAMS UNDER THE HOUSE WERE IMPLEMENTED AS  
PER ADVICE GRADE A REMODELING CO DID THE WORK.  
EVEN AFTER THE WORK WAS DONE, THE HOUSE SNAPPED AND  
CRACKED, AND THE WHOLE PROPERTY SHOOK AND NOISE FROM THE

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## EXHIBIT 4-A

PUMPS COULD BE HEARD. BRICKS ARE CRACKED RIGHT WHERE THE WATER PIPE COMES INTO THE HOUSE.

## STRAY ELECTRIC VOLTAGE

IN JANUARY OF 2004, ELECTRICAL IMPULSES AND VIBRATIONS SURGED THROUGH THE HOUSE. A PHONE CALL WAS MADE TO THE VETERANS' CLINIC. I SPOKE TO THE CEO. I THOUGHT THERE MAY HAVE BEEN A PROBLEM WITH THEIR GENERATOR. HE SAID IT IS ONLY USED IN AN EMERGENCY. HE DID INFORM THE PROPERTY MANAGER, EARL STAFFORD. OF THE PROBLEM. THIS REALTOR CAME TO MY HOUSE. THINGS WERE TURNED DOWN BY THE TIME HE ARRIVED. A "RED FLAG" WENT UP AS HE TOLD ME I DIDN'T WANT TO GET A LAWYER. THEY WORKED LONG AND HARD TO GET THE PUMP STATION IN PLACE!!! HE SAID HE DID NOT FEEL ANYTHING, BUT HE DID RETURN FOR A SECOND VISIT WITH HIS GIRLFRIEND. SHE FELT THE VIBRATIONS THROUGH THE LIVING ROOM FLOOR RIGHT AWAY. AS HE LEFT, I TOLD HIM YOU COULD FEEL THE WHOLE GROUND SHAKE IN THE DRIVEWAY. HE SAID, "OH, YEAH!" I NEVER HEARD FROM HIM, AGAIN.

## EXHIBIT 3-B

I BEGAN FEELING VIBRATIONS COMING THROUGH ALL OF THE FURNITURE, AND WOKE UP CRYING BECAUSE OF THE ELECTRICAL INTENSITY IN THE HOUSE. PHONE CALLS WERE MADE TO PPL AND THE TOWNSHIP. I REPORTED THAT I FELT LIKE I WAS BEING ELECTROCUTED IN MY OWN HOME. I WAS TOLD TO "INVESTIGATE ON MY OWN" BY PPL. THE TOWNSHIP SAID THEY WERE "TOO BUSY" TO EVALUATE PROBLEMS HERE AT THE HOUSE. THEY DID SAY BLASTING FOR NEW HOUSES IN THE AREA WAS PROBABLY THE SOURCE OF THE PROBLEM! I DID CONTACT THE DEP - BLASTING DIVISION. THE REPORT LISTS DAMAGES, AND IT SAYS THOSE DAMAGES ARE NOT FROM BLASTING. ALTHOUGH A NOTICE OF VIOLATION WAS SENT TO THE ED WEAN DRILLING AND BLASTING CO.

EXHIBIT 3-C

ON SEVERAL NIGHTS, I SLEPT IN THE CAR WITH THE CAT BECAUSE VIBRATIONS AND ELECTRICAL IMPULSES WERE SO AWFUL I WE SLEPT AT THE "DAYS INN" -CAT, TOO, AND I LEFT THE HOUSE AS OFTEN AS I COULD. IN THE GARAGE, THE VIBRATIONS WERE FELT IN THE CAR, AS WELL.

I CALLED MY ATTORNEY, MICHAEL HENRY. HE SAID HE DID NOT HANDLE THIS SORT OF THING. THAT DAY I WAS SOBBING BECAUSE OF THE ELECTRICITY SURGING THROUGH THE FURNITURE. HE REFERRED ME TO PAT REILLY OF THE SAME LAW FIRM (GROSS, MCGINLEY, LABARRE, AND EATON). AFTER SPEAKING TO HIM, HE SAID I SHOULD GET THE MAGNETIC FIELD TESTED. I WAS SHOCKED ON SEVERAL OCCASIONS FROM STRAY VOLTAGE. I WAS AWAKENED EVERY TWO HOURS ALL NIGHT LONG FROM NOISE IN THE WATER PIPES, VIBRATIONS, AND ELECTRICAL VOLTAGE SURGING THROUGH THE FURNITURE.

SOMEHOW, I WAS GIVEN A MAN'S NAME FROM READING WHO TESTS VIBRATIONS. HE WAS TOO OVERLOADED WITH WORK, SO HE GAVE ME AN ENVIRONMENTALIST'S NAME FROM PHILLIPSBURG N. J.

SAL LA DUCA CAME ON A SUNDAY MORNING (3/20/04) TO DO TESTING. HE SAID ALL THE POWER LINES TO MY HOUSE ARE TIED TO THE PUMP STATION.

EXHIBIT 3-D

I WENT TO PAT REILLY, ATTORNEY, WITH THE REPORT. HE CALLED SAL LA DUCA, THEN SAID SOUTH WHITEHALL HAD BEEN DIFFICULT TO DEAL WITH FOR DECADES AND SAID HE COULD NOT HELP ME.

EXHIBIT 5-A

AN EDITORIAL LETTER WAS WRITTEN TO "THE MORNING CALL". IT WAS NOT PRINTED

I WROTE TO A FRIEND IN GRANTS PASS, OREGON. SHE IS A NURSE AND WAS CONCERNED FOR MY HEALTH AND SAFETY. SHE GOT ON HER COMPUTER AND CONTACTED THE EPA - PHILADELPHIA.

EXHIBIT 3-E

TWO ENGINEERS FROM THE EPA AGREED TO VISIT MY HOME ON 6/2/04. EVERY TIME I HAD PEOPLE HERE TO DO TESTS, THE PUMPS WERE TURNED WAY DOWN. AS SOON AS ANYONE LEFT, THEY RESUMED TO A GREATER SPEED - GREATER INTENSITY. HOWEVER, FRAN DOUGHERTY DID PUT A DEVICE UP NEAR THE CEILING IN THE LAUNDRY ROOM CLOSET WHERE THE OVERHEAD WIRES COME INTO THE HOUSE. HE SAID, "OH, THAT IS HIGH!" STRAY VOLTAGE HAD SURGED INTO THE HOUSE FROM A TRANSFORMER POLE. SOME SORT OF COIL WAS PLACED AT HAMILTON BLVD. AND READING RD. AFTER THE EPA VISIT, THE STRAY VOLTAGE WAS GATHERED AND THINGS WERE A LITTLE BETTER, BUT NOT MUCH BETTER.

EXHIBIT 3-F

THEY ADVISED CLEANING THE HEATING DUCTS, ROCK DUST BLOWS AROUND THE HOUSE. THE WORK WAS DONE, DID NOT CLEAR THE AIR AT ALL. 'AIR CARE AND RESTORATION' COMPLETED TESTS. THEY CONFIRMED ROCK DUST IS IN THE AIR.

EXHIBIT 3-G

AS I STOOD IN THE KITCHEN, MY FEET GOT HOT STANDING IN ONE SPOT TOO LONG. I TOLD ANOTHER FRIEND, ELAINE BIERMAN, HER HUSBAND IS A VERIZON ENGINEER. HE SAID THEY USE TRINITY ASSOCIATES, INC. FOR TROUBLESHOOTING SO, I CALLED THIS COMPANY. HE WAS COMING TO BETHLEHEM TO DO WORK ONE DAY AND SAID HE WOULD STOP.

EXHIBIT 3-H

HE THOUGHT PUMPS MAY BE UNBALANCED OR SOUND ISOLATORS MAY NOT BE IN PLACE. HE CALLED SOUTH WHITEHALL AND STEVE HENNING, ENVIRONMENTAL MANAGER, FOR THE PIDCOCK CO. - INSTALLERS OF THE PUMPS.

EXHIBIT 3-I

FINALLY, I CALLED MARTHA NOLAN, A SOUTH WHITEHALL BOARD MEMBER. SHE WAS VERY ATTENTIVE SHE GAVE MY

EXHIBIT 4-B

NAME AND ESSENCE OF THE PROBLEM TO GERALD GAZDA, TOWNSHIP MANAGER. SHE SAID HE WOULD NOT BE HAPPY, AS THEY HAD OTHER PROBLEMS BEHIND THE VETERANS' CLINIC WHEN A RETAINING WALL COLLAPSED. HE CALLED AND SAID I COULD NOT ACCUSE THEM OF ANYTHING UNLESS I HAD TESTS DONE AND PAPERS TO VERIFY. I SAID I DID HAVE AN ENVIRONMENTALIST'S REPORT. HE SENT THOMAS UFF OVER TO GET THE PAPERS.

~~EXHIBIT 4-B~~

I CONTINUED TO EXPERIENCE RED BURNS FROM SLEEPING IN MY OWN BED. STILL DO. MANY TIMES, I SLEPT AT THE OTHER END OF THE HOUSE - TV ROOM.

PPL DID FINALLY SEND ENGINEERS -AFTER THE EPA ENGINEERS WERE HERE. REPORTS CLAIMED ALL READINGS FOR STRAY VOLTAGE WERE LOW. TESTS WERE DONE IN THE DAYTIME WHEN ONE PUMP IS IN OPERATION. TWO LARGE PUMPS AND A CHLORINE PUMP RUN AT NIGHT

EXHIBIT 3-J  
EXHIBIT 3-K

THEY REPEATED TESTS IN 2006. ALL READINGS WERE HIGHER. I TOLD HER THAT THE TREES WERE DEAD AT THOSE HIGHEST AREAS. A MONITOR WAS PLACED ON MY ELECTRIC METER ON 7/11/06. I DID NOT RECEIVE A REPORT OF THOSE RESULTS FROM PPL.

EXHIBIT 4-C  
EXHIBIT 4-D

IN SEPT. OF 2004, AL LOCH SAID HE COULD RENT AN ANALYZER TO DETERMINE WHERE VIBRATIONS WERE COMING FROM. TESTS MATCHED VIBRATIONS HERE AND AT THE PUMP STATION DOOR. 6 AMPS OF ELECTRICITY WERE RUNNING IN THE WATER PIPES. GROUND RODS WERE DRILLED INTO THE ROCKS UNDER THE HOUSE. WE SENT THE RESULTS TO PPL, TV STATION, SOUTH WHITEHALL AUTHORITY, AND NOBODY SAID ANYTHING.

EXHIBIT 4-E

AL LOCH WAS GIVEN PERMISSION TO ENTER THE PUMP STATION. NO CLAMPS, SPRINGS, OR SOUND ISOLATORS ARE INSTALLED. NOR ARE THERE ANY INSULATION PADS UNDER THE PUMPS

EXHIBIT 5-B

I CONTACTED AN ATTORNEY IN PHILADELPHIA. SHE CONTACTED THE PIDCOCK CO. AND THREATENED A LAW SUIT WOULD BE FILED AND

EXHIBIT 5-C

SUDDENLY, AFTER KEEPING MY PAPERS FOR 10 MONTHS, SHE DROPPED THE CASE. SHE DID NOT RETURN THE PICTURES OF THE PUMPS WITH THE MATERIALS RETURNED TO ME I SENT HER A LETTER.

TWO OTHER ENVIRONMENTAL ATTORNEYS WERE CALLED. ONE TRIED TO SMEAR AND RUIN PICTURES OF THE PUMPS, ANOTHER SAID IT WOULD COST ME A SIX-FIGURE AMOUNT AND WASN'T WORTH THE EFFORT! THE "SMEARER" IS LOCATED IN SOUTH WHITTHALL TOWNSHIP!!

I HAD THE STRUCTURAL ENGINEER RETURN FOR A SECOND TIME IN 2004. HOPEFULLY TO VERIFY THAT CRACKS WERE WORSE I, THEM, DISCOVERED HE USED TO WORK FOR THE PIDCOCK CO. -INSTALLERS OF THE PUMPS. HE SAID HE WOULD TALK TO STEVE HENNING OF THE PIDCOCK CO. HE DID. AFTER WAITING 3 MONTHS FOR HIS SECOND REPORT, I CALLED, YET AGAIN, HE LAUGHED AND SAID THEY DID NOT INTEND TO DO ANYTHING ABOUT THE SITUATION.

HE ADVISED GEOTECHNICAL STUDIES TO BE DONE. I TRIED TO HAVE A FORENSIC ENGINEER FROM EASTON DO TESTS, HE SENT THE FILE ON TO A PROFESSOR AT LAFAYETTE COLLEGE. HE WAS GOING TO BORROW A SEISMOGRAPH AND TEST AT NIGHT WHEN THREE PUMPS ARE IN OPERATION, AND SUDDENLY HE COULD NOT HELP ME EITHER

EXHIBIT 3-1

EXHIBIT 3-M  
EXHIBIT 5-D

A PUC COMPLAINT WAS FILED.  
HONORABLE JUDGE VERONICA SMITH, PUC HARRISBURG, RULED A HEARING WOULD BE HELD. HONORABLE JUDGE CHARLES RAINEY ORDERED TWO CONFERENCE CALLS TO BE HELD -MAY 10, 2006 AND JULY 27, 2006

A HEARING IS SCHEDULED FOR NOV. 30, 2006 IN THE PHILADELPHIA STATE OFFICE BUILDING.

SUBMITTED BY LINDA L. DAVID

SIGNATURE

*Linda L. David*

DATE

9/15/06

## EMF Research

Two main types of studies — laboratory and epidemiology — are used to investigate whether exposure to things like EMF chemicals or medicines are beneficial or harmful to humans. Both types have been used over the years to study whether EMF associated with electricity can affect our health. In addition to the health studies, researchers also are doing exposure assessment studies to determine the amount of EMF exposure occurring around various sources, occupations and activities.

The utility industry has been supporting EMF research by scientists at universities, medical schools and independent research laboratories. The National Cancer Institute, the National Institute of Environmental Health Sciences and the U.S. Department of Energy have supported EMF studies by health and medical scientists. In 1992, the Energy Policy Act authorized \$55 million for a national research and communications program under the general direction of the U.S. Department of Energy and the National Institute of Environmental Health Sciences. PPL supported it as program and similar programs. Agencies in Canada, Italy, Sweden and the United Kingdom also have supported EMF research.

## Laboratory Research

The first type — basic laboratory research — looks for biological changes in the body or in isolated tissues and cells under controlled conditions. Some studies have reported that both electric and magnetic fields produced biological responses while other studies have not found any responses. But none of those responses was shown to cause disease or illness. Consider, for instance, how the pupil in your eye responds to changes in lighting conditions by getting larger or smaller. That's a biological response, yet no harm occurs.

## Epidemiologic Research

The second major type of health study is called an epidemiologic investigation. It relies on statistical surveys to look for patterns of disease among groups of people. Studying people in their own studies, epidemiologists have often tried to compare the EMF exposure of healthy people with the exposure of people who had certain types of cancer or some other disease. The researchers actively measured the EMF in their work environments and then compared it to a variety of other factors.

Magnetic field strengths decrease with distance	Source: "EMF in Your Environment," U.S. Environmental Protection Agency, 1992		
Magnetic fields are measured in milligauss	At 5 inches	At 1 foot	At 2 feet
Clothes dryer	2 to 10	1 to 3	*
Microwave oven	100 to 300	1 to 200	1 to 30
Toaster	5 to 20	* to 7	*
Power drill	100 to 200	20 to 40	3 to 6
Corn cooker	500 to 1,500	40 to 300	3 to 30
Mixer	30 to 500	5 to 100	* to 10
Hair dryer	1 to 700	* to 70	* to 10
Color television	Data not available	* to 20	* to 8

FIGURE 2 \* The magnetic field measurement at this distance from the operating appliance could not be distinguished from background measurements taken before the appliance had been turned on.

## Magnetic fields near overhead electric power lines

For overhead power lines, the strength of the magnetic field is dependent upon a number of factors, such as the height of the wires, current flow, wire configuration and the distance from the lines. These factors produce a magnetic field that drops off rapidly as you move away from the power line.

Type of overhead power line	Under the line	50 ft	100 ft	200 ft
220 and 330 kV	5,400	5,250	1.75	0.625
69 and 118 kV	380	0.825	0.10	0.03
2 kV overhead	0.100	0.01		

FIGURE 3 Magnetic fields are measured in milligauss.

The magnetic field values provided in this table represent a general range of values associated with the types of overhead power lines listed and are provided for illustration. There will be circumstances in which there will be magnetic field levels above or below the range of values provided. The following factors affect the magnetic field: current flow and distance.

Some — but not all — of the studies

that relied on estimated exposures reported associations with cancer, while other studies did not find such associations. None of the studies where measurements were taken have concluded that children with higher actual magnetic field exposures were at higher risk for any disease or illness. In 1997, a large study conducted by the U.S. National Cancer Institute found that children living near power lines or exposed to higher magnetic fields at home did not have a greater risk of childhood leukemia. Similarly, a large national case study in the UK reported in 1999 and 2000 that children with higher magnetic field exposures at home and at school, or who lived closer to power lines, did not have an increased risk of developing any cancer.

Epidemiologists have looked for a possible link with cancer by studying workers whose jobs may expose them to high levels of EMF. Some, but not all, of these studies have indicated that certain jobs, grouped as "electrical workers," have higher rates for certain cancers than workers in other jobs. However, in most of these earlier occupational studies, workplace magnetic field exposures were not measured, raising questions of the validity of the results.

Several studies of large populations of exposed workers in Canada and France, Sweden, and two in the United States did include magnetic field measurements to estimate if a worker's exposure to magnetic fields in various job categories. No overall increase in cancer was found. However, some of the studies reported associations between some forms of brain cancer and leukemia and estimated exposures of some groups of workers. Other similar studies did not report these associations. These studies have not concluded that EMF caused cancer or any other illness.

For all the epidemiologic studies, it is important to note that a suggested association between two events does not prove causation. There are many other factors that could cause the other, for

example, an epidemiologic study might find a statistical association between being overweight and the use of artificial sweeteners. Such an association would not mean that using artificial sweeteners causes people to gain weight. The weight gain, of course, would be caused by other factors.

## Scientific and Regulatory Reviews

Since the mid-1970s, various panels of scientists, professional organizations and regulatory agencies have evaluated the scientific research on EMF and human health. In the 1980s, scientific reviews were conducted or sponsored by the World Health Organization and the New York State Department of Health. Since 1990, evaluations of the EMF issue were published by review groups in various states, other nations and scientific organizations, including the U.S. National Academy of Sciences, the U.S. National Institute of Environmental Health Sciences (NIHESI), the U.K. National Radiological Protection Board, the International Agency for Research on Cancer and the World Health Organization. None of these review groups concluded that there is a demonstrated causal relationship between EMF and cancer or other diseases.

In 1990, as part of the National EMF Research (EMF-PAID) Program, the director of NIHESI sent a report on EMF research to the U.S. Congress. The NIHESI report concluded that "the scientific evidence supporting that E1-E3/EMF exposures pose any health risk is weak." The NIHESI report noted that while some epidemiology studies showed possible small associations with some cancers, there was no support for these findings in laboratory research. The director of the NIHESI concluded that "this finding is insufficient to warrant aggressive regulatory concern." Similarly, the National Academy of Sciences reported in 1990 that "the results of the EMF-PAID program do not support the conclusion that the use of electricity poses a major unrecognized public health danger."

## What PPL Is Doing

For one thing in response to concerns of some of our customers, we've changed the way we design and build some of our transmission and distribution lines in order to reduce magnetic fields. These design changes can cut magnetic fields substantially in places where different wire arrangements, poles

revised operating procedures and consideration of EMF concerns within the facility-siting process are just a few of the steps we're taking as part of our field management program. In the absence of a proven health hazard, these design changes represent a sensible, prudent and precautionary approach.

PPL supported efforts to make EMF research and communications a part of the nation's energy policy. We have made financial contributions to the national program. We have supported additional EMF studies through the Electric Power Research Institute, an organization that sponsors research related to the electric utility industry. Under EPRI's program, more than \$50 million has been given to universities and national laboratories for independent EMF studies.

Supplementing PPL's financial support for research, our employees and customers have participated in surveys designed to gather more information on EMF levels in the home and at work.

We also provide more information to customers and others interested in the subject. EMF coordinators have been assigned to serve as local contact points for EMF inquiries. In addition, company representatives will talk to groups interested in the subject.

### PPL's Commitment



PPL Chairman  
William F. Heck

"We're concerned about the welfare of our customers, our employees and the public. As a company, we're committed to providing electricity in a safe, reliable and economical manner. Because of that commitment, we'll continue our efforts to address the EMF issue. For example, we'll continue to reduce magnetic field levels in new power lines when it makes sense to do so and can be done for little or no cost. And, we'll provide information on the subject to our customers and employees."

For more information on EMF, or any other subject related to your electricity service, please call 1-800-DIAL-PPL (1-800-342-5775).

William F. Heck  
11/30/06

### PPL's View on EMF

Some people are worried that electric and magnetic fields are harming their health. Others think the scientific research does not show a problem at all, and still others believe there's just too much scientific uncertainty to draw any conclusions.

Here's what we do know. Various panels of scientists have reviewed the large body of EMF research. None of these scientific reviews has concluded that exposure to EMF is known to be harmful. Some of the reviews have concluded that certain epidemiology studies point to a "possible" association with childhood leukemia, which requires further research, but that the scientific research has not demonstrated a causal relationship between EMF and any disease or illness.

Given those conclusions, PPL is taking a reasoned, prudent approach in responding to the EMF issue. We have supported additional research. We reduce magnetic field levels from new power lines when it can be done at no or low cost. We provide information on the subject to our customers and employees. This brochure is one part of our EMF information program.

### EMF Are All Around Us

Electric and magnetic fields occur in nature and in all living things. The Earth, for instance, has a magnetic field, which makes the needle on a compass point north.

Electric fields and magnetic fields of a different type also surround every wire that carries electricity. In everyday life, these EMF arise from several basic sources, including power lines, electrical appliances, home and building wiring, other utility lines and cables, and currents flowing on water pipes. Though they often occur together, EMF are made up of two separate components.

### Electric Fields

Electric fields are produced by the voltage or electric pressure — on a wire, the higher the voltage, the higher the electric field. As long as a wire is energized — has voltage present — an electric field is present (see figure 1). In other words, an appliance, or an electric power line, doesn't actually have to be turned on to create an electric field. It just has to be plugged in. Electric fields diminish with distance and can be blocked or partially shielded by objects such as trees and houses.

### Magnetic Fields

Magnetic fields are created by the current or flow of electricity through a wire. Generally speaking, the higher the current, the higher the magnetic field. Because they only occur when current is flowing, magnetic fields are present only when the power is turned on (see figure 2). Magnetic fields also diminish with distance, but — unlike electric fields — they are not blocked by common objects such as trees and houses. In recent years, public and scientific interest has turned toward the magnetic field component of EMF because of some scientific studies regarding these fields.

### Measuring Magnetic Fields

Magnetic fields usually are measured in a unit called a milligauss. Magnetic field levels found in the living areas of homes typically range from less than 1 milligauss to about 4 milligauss, according to the U.S. Environmental Protection Agency. They can be higher in some cases. The levels next to appliances can exceed 1,000 milligauss. Figures 2 and 3 show how the strength of the field falls off as you move away from the source, just as the heat of a campfire grows weaker as you walk away from it.

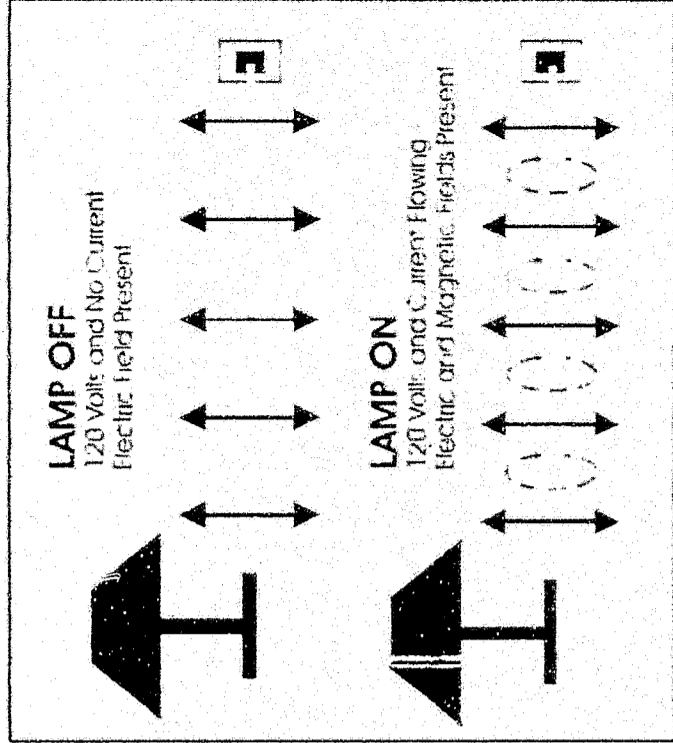


FIGURE 1

# ppl Electric and Magnetic Fields



C-20055501  
11/30/06, PHILA

IN THE MATTER OF:

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

LINDA L. DAVID : COMPLAINT DOCKET  
Complainant

vs. :

PPL ELECTRIC UTILITIES  
CORPORATION and  
SOUTH WHITEHALL TOWNSHIP  
et al

Respondents : NO. C-20055501

**DOCUMENT  
FOLDER**

**DOCKETED**  
JAN 08 2007

Tuesday, November 14, 2006

STATEMENT OF GERALD GASDA for submission to  
Pennsylvania Public Utility Commission, taken  
the above date, commencing at 2:36 p.m.

RECEIVED  
2007 JAN - 8 AM 9:03  
PA P.U.C. BUREAU  
SECRETARY'S BUREAU

C-20055501  
11/30/06, PHILA



APPEARANCES:

MAYERS, MENNIES & SHERR  
BY: LORI MILLER, ESQUIRE  
3031 Walton Road  
Building A, Suite 330  
Blue Bell, Pennsylvania, 19422  
Attorney for Respondents

1 THE FOLLOWING IS A WRITTEN STATEMENT OF GERALD J.  
2 GASDA FOR SUBMISSION TO THE PENNSYLVANIA PUBLIC  
3 UTILITY COMMISSION:

4 - - -

5 BY MS MILLER:

6 Q Good afternoon, Mr. Gasda. My name is Lori  
7 Miller. As you know I represent South Whitehall  
8 Township in the matter brought by Mrs. David in  
9 front of the P.U.C.

10 I just have a few questions for  
11 you this afternoon in order to prepare some  
12 written submissions for Judge Rainey in  
13 anticipation of a hearing on November 30, 2006.

14 Would you state your name for the  
15 record?

16 A Gerald J. Gasda.

17 Q What is your address, please?

18 A 4444 Walbert Avenue, Allentown,  
19 Pennsylvania.

20 Q And who do you work for?

21 A South Whitehall Township.

22 Q And what is your capacity for South  
23 Whitehall Township? In other words, what is  
24 your position?

1 A Township manager.

2 Q And in your capacity as Township Manger,  
3 are you familiar with a pumping station located  
4 on Hamilton Boulevard?

5 A Yes, I am.

6 Q Does South Whitehall Township own the  
7 pumping station located on Hamilton Boulevard?

8 A No. The township does not own it.

9 Q Does South Whitehall Township operate the  
10 pumping station located on Hamilton Boulevard?

11 A No, it does not.

12 Q Mr. Gasca, is South Whitehall Township a  
13 separate legal entity from South Whitehall  
14 Township Authority?

15 A Yes, it is. It's a separate municipal  
16 corporation.

17 MS. MILLER: Thank you.

18

19

20

21

22

23

24

IN THE MATTER OF:

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

LINDA L. DAVID : COMPLAINT DOCKET  
Complainant

vs. :

PPL ELECTRIC UTILITIES  
CORPORATION and  
SOUTH WHITEHALL TOWNSHIP  
et al

Respondents : NO. C-20055501

**DOCKETED**  
JAN 08 2007

---  
Tuesday, November 14, 2006  
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**DOCUMENT  
FOLDER**

STATEMENT OF JAMES BALLETT for submission to  
Pennsylvania Public Utility Commission, taken  
the above date, commencing at 3:10 p.m.

RECEIVED  
2007 JAN -8 AM 9:03  
PA P.U.C. BUREAU  
SECRETARY'S BUREAU

C-20055501  
11/30/06, PHILA

South Whitehall <sup>Top Authority</sup> Stmt. # 1 + 3 exhibits

APPEARANCES:

MAYERS, MENNIES & SHERR  
BY: LOPI MILLER, ESQUIRE  
3031 Walton Road  
Building A, Suite 330  
Blue Bell, Pennsylvania, 19422  
Attorney for Respondents

EXHIBITS

EXHIBIT NO.	PAGE NO.
Balliet-1	6
Balliet-2	11
Balliet-3	12

1 THE FOLLOWING IS A WRITTEN STATEMENT GIVEN FOR  
2 SUBMISSION TO THE PENNSYLVANIA PUBLIC UTILITY  
3 COMMISSION BY MR. JAMES BALLIET:

4 - - -

5 BY MS. MILLER:

6 Q Good afternoon, Mr. Balliet. As you know,  
7 I'm Lori Miller and I represent South Whitehall  
8 Township and South Whitehall Authority in the  
9 matter brought by Mrs. David in the P.U.C.

10 We're here this afternoon to  
11 prepare written submissions for Judge Rainey in  
12 anticipation of a hearing to be held on November  
13 30, 2006.

14 Can you state your name for the  
15 record?

16 A James Franklin Balliet.

17 Q Can you state your address, please?

18 A My home address is 4235 Manor Drive,  
19 Allentown, Pennsylvania, 18104.

20 Q What your position, please?

21 A Foreman.

22 Q Does that include a foreman with respect  
23 to the pumping station located on Hamilton  
24 Boulevard?

1 A Yes.

2 Q How long have you held that position?

3 A For six years.

4 Q Mr. Balliet, with respect to your duties

5 with regard to the South Whitenall Township

6 Authority, are you familiar with the pumping

7 station located on Hamilton Boulevard?

8 A Yes.

9 Q How many pumps are located at that pumping

10 station?

11 A Two.

12 Q Have there ever been three pumps at that

13 station?

14 A No.

15 Q Since this station went on line,

16 generally, how many pumps run at a time in the

17 automatic mode?

18 A One pump at a time.

19 Q Since the station went on line, have there

20 been any substantial or significant changes in

21 its operation?

22 A Yes.

23 Q When did that change or changes occur?

24 A June 2006.

1 Q What was that change?

2 A In the auto-con or computer mode that two  
3 pumps can now run in the automatic mode, if  
4 needed.

5 Q Why would you need two pumps?

6 A If we had a demand that would be more than  
7 the system and we needed more water than the  
8 demand would be up for. Usually, if we lose  
9 another pump station, we have to put that  
10 second pump on.

11 Q And since that change in June of '06 where  
12 you had that capability, has the automatic mode  
13 turned both pumps on?

14 A No.

15 Q Mr. Baillet, can you tell me who the  
16 Hamilton pumping station provides service to?

17 A South Whitehall Township, to the  
18 residents.

19 Q Is Mrs. David a customer of the South  
20 Whitehall Township Authority?

21 A No.

22 Q Do you know who provides her water service  
23 to her?

24 A Yes.

1 Q Who would that be?

2 A City of Allentown Water.

3 Q And how do you know that?

4 A In my investigation when she called in,  
5 she's not listed in South Whitehall Township.

6 And I found that she lives in the City of  
7 Allentown and the City provides her with water.

8 Q How, if at all, is Mrs. David related to  
9 the South Whitehall Township Authority, and/or  
10 the pumping station, for that matter?

11 A The only way is she's on a grid that South  
12 Whitehall Township is connected to, and she has  
13 no relation at all as far as being our customer  
14 or anything on our end.

15 Q I'm going to show you a diagram or a map  
16 which I'll mark as Balliet-1.

17 (Exhibit Balliet-1 is marked for  
18 identification)

19 Q Mr. Balliet, I've shown you this diagram  
20 which we've marked as Balliet-1 for the written  
21 submission. Can you identify what this is,  
22 please?

23 A Yes. This is a water map showing the  
24 Allentown grid system on a several-block area

1 and part of South Whitehall Township grid area.

2 Q Is Mrs. David's home or the proximity of  
3 her home indicated on this map?

4 A No.

5 Q Can you identify approximately where her  
6 home is on this map?

7 A Yes.

8 Q Can you mark it with a red X, please?

9 A Yes, I can.

10 Q And is the Hamilton booster pumping  
11 station referenced on this map?

12 A Yes.

13 Q Can you explain or can you give me a  
14 general description of the grid system as it's  
15 reflected on this map?

16 A Sure. It shows the Allentown City grid.  
17 It's showing South Whitehall Township grid  
18 connected to the city grid. That would be on  
19 our suction side of the Hamilton Boulevard  
20 station. So it's showing the connection of  
21 South Whitehall Township to the city grid.

22 Q Is there a direct pipe connection between  
23 the Hamilton booster station and Mrs. David's  
24 home?

1 A No.

2 Q Mr. Balliet, you indicated that Mrs. David  
3 is not a customer of the Authority nor do you  
4 provide water to her; is that correct?

5 A That's correct.

6 Q Mr. Balliet, how does the fact that  
7 Mrs. David takes water from the city of  
8 Allentown grid and you also receive your water  
9 from the City of Allentown relate?

10 A It shows that we are a customer downstream  
11 from where she takes her water and we're  
12 pulling water through the system on the suction  
13 side, as we call it, on Hamilton Boulevard and  
14 our pumps then boost the pressure to meet the  
15 South Whitehall system pressure which is higher  
16 than the City of Allentown pressure.

17 Q Does the water from the booster station  
18 travel away from her house or towards her  
19 house?

20 A It travels away from her house into South  
21 Whitehall Township.

22 Q Mr. Balliet, did you have occasion to  
23 visit Mrs. David's home in early June of 2004?

24 A Yes.

1 Q What was the purpose of going to her home?

2 A To prove to her and her consultant that  
3 she had -- that the pump stations when the  
4 pumps were running, if they were still making  
5 noise that she'd hear it or not hear it or feel  
6 the vibration when the pumps were on or off.  
7 We wanted to see ourselves if this was a  
8 problem.

9 Q When you went to her house, what did you  
10 do?

11 A We were able to through the auto-con  
12 system, which is a computer system, I can take  
13 my laptop and we went into her house and  
14 physically bring up on the laptop the station.  
15 And she can see the pumps on or off. Her  
16 consultant went down to the station with  
17 another water operator of mine with a radio and  
18 we sat in her living room and I would have the  
19 pumps running. Her consultant would confirm  
20 that on the radio, so she could hear that. And  
21 we asked if she felt the vibration. And then  
22 we shut off the pumps.

23 Q Let me stop you there. When the pumps  
24 were running did she feel vibrations or sense

1 some kind of condition in her house?

2 A Yes, she felt the condition. When we came  
3 to the door, she was feeling conditions.

4 Q So then you had occasion to turn off the  
5 pump; is that correct?

6 A Yes. We shut off the pump and her  
7 consultant confirmed it was off and she still  
8 felt the vibrations.

9 Q Did that lead you to any conclusion with  
10 regard to any effect the pumping station in its  
11 on mode might be having to her home?

12 A Yes. I concluded that it was not a  
13 problem to this house.

14 Q Did you on or about late October or early  
15 November of 2004, did you happen to receive one  
16 or more complaints from Mrs. David with regard  
17 to the alleged vibrations in her home?

18 A Yes.

19 Q Do you recall what your response was upon  
20 your investigation of the complaints?

21 A Yes. I was amazed because I knew we had  
22 removed both pumps out of the station to be  
23 rebuilt. The station was down, off line, as we  
24 call it, from October 20th, '04, and we didn't

1 get the pumps on until November, somewhere  
2 around the 10th, or in that, the 9th or 10th.  
3 When we got them back in and put the station  
4 back on line. There were no pumps in the  
5 station.

6 Q I'm showing you what I'll mark as  
7 Balliet-2.

8 (Exhibit Balliet-2 is marked for  
9 identification)

10 Q Can you tell me what that is?

11 A This is the daily water withdrawal that we  
12 have to provide to D.E.P. for Hamilton  
13 Boulevard, Station 29 pumping station.

14 Q Does this report reference Hamilton  
15 Boulevard Number 29?

16 A Yes.

17 Q And does that correlate to the pumping  
18 station that we discussed today?

19 A Yes.

20 Q Can you tell me exactly what this report  
21 reflects?

22 A It reflects the daily water withdrawal,  
23 the gallons that the station will produce per  
24 day, per month.

1 Q On the dates of October 22nd, 2004 until  
2 November 8th, 2004, what was the daily water  
3 withdrawal or production?

4 A Zero production.

5 Q Again, why was that?

6 A There were no pumps in the station to pump  
7 water.

8 Q Mr. Balliet, I will show you what appears  
9 to be an e-mail to you dated June 23rd, 2004.

10 Can you identify this?

11 A This is from our e-mail system for a  
12 dispatch answering service. When they get a  
13 complaint in, it actually not only goes over  
14 our pager, but I get a copy in e-mail of what  
15 the complaint is and who the complainant is.

16 Q I'll identify this as Balliet-3. Is that  
17 correct?

18 (Exhibit Balliet-3 is marked for  
19 identification)

20 A Yes.

21 Q Can you tell me more specifically what's  
22 reflected in Balliet-3?

23 A It says the caller is Linda David and it  
24 gives her phone number and water pump behind

1 the V.A. Clinic going full blast, adjust. This  
2 is a complaint from Linda Davis.

3 Q Can you tell me what time that complaint  
4 was received?

5 A It first came in at 1851 hours.

6 Q Which would be approximately what?

7 A 6:51 p.m.

8 Q Did you have occasion to investigate that  
9 complaint?

10 A Yes, I did.

11 Q What did you conclude?

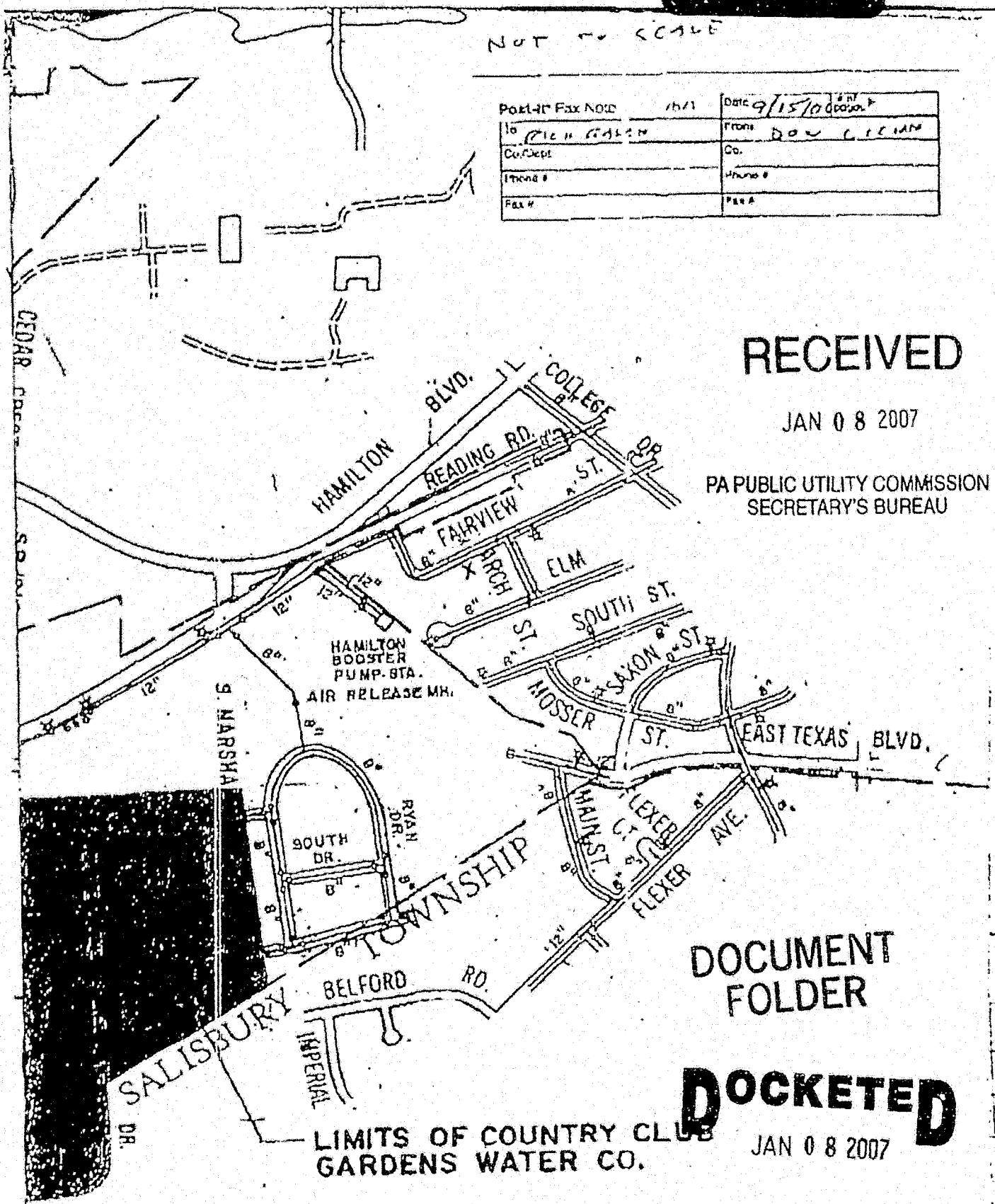
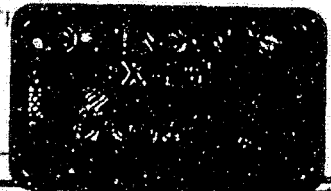
12 A When I went back in the computer to see if  
13 the pump station was running, I found that the  
14 pump station shut down at 1815 hours. That  
15 would be 6:15. So when she called to complain  
16 saying it was running and it was a nuisance,  
17 the station was not even on line.

18 Q Mr. Balliet, Balliet-3 references the  
19 water pump behind the Vet clinic. Is that in  
20 fact the pumping station on Hamilton Boulevard  
21 that we discussed today?

22 A Yes.

23 MS. MILLER: Thank you.

24



Post-It Fax Note	1/11	Date	9/15/06	Page #	1 of 1
To	WILLIAM GARDEN	From	DOUG L. CLARK		
Co./Dept		Co.			
Phone #		Phone #			
Fax #		Fax #			

RECEIVED

JAN 08 2007

PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

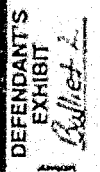
DOCUMENT  
FOLDER

DOCKETED  
JAN 08 2007

LIMITS OF COUNTRY CLUB  
GARDENS WATER CO.

Exh. 10

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

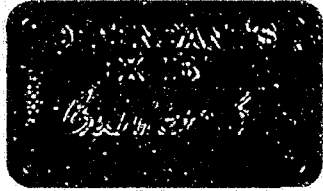


Day	January	February	March	April	May	June	July	August	September	October	November	December	Total
1	439,817	41,068	168,090	2,78,239	359,577	427,669	224,163	192,550	60,090	519,953	1,947,448		
2	105,637	53,611	64,691	54,691	147,448	436,423	231,459	151,328	57,409	643,122	1,271,448		
3	281,845	374,843	53,435	175,262	50,813	271,947	196,360	157,876	69,592	375,392	1,851,424		
4	233,743	383,595	50,758	107,919	87,713	238,191	242,174	104,355	72,264	201,929	2,070,112		
5	117,086	160,511	782,506	208,597	107,071	85,270	244,049	216,213	186,793	65,335	1,535,271		
6	115,645	237,721	769,710	10,325	99,503	77,500	282,228	20,773	159,001	60,600	1,577,532		
7	145,405	277,483	76,129	6,449	109,350	76,536	107,543	294,893	151,691	119,637	1,730,093		
8	147,874	187,567	276,799	55,172	52,308	187,557	67,718	138,031	11,990	56,748	1,475,565		
9	144,592	208,770	56,666	50,001	114,852	184,321	16,914	165,817	66,267	59,735	1,772,344		
10	223,453	226,008	42,271	63,005	82,503	221,612	24,129	140,015	85,676	66,467	1,946,785		
11	251,667	251,105	36,487	80,500	1,370	331,576	30,756	149,010	121,213	62,593	2,288,600		
12	241,558	225,759	43,514	191,294	19,322	459,440	81,514	134,000	243,521	63,600	2,484,166		
13	67,279	254,331	26,283	161,032	178,177	199,836	34,534	18,472	181,331	377,277	2,172,193		
14	49,553	426,524	77,840	199,875	138,796	137,894	68,754	108,192	145,869	48,308	2,156,561		
15	109,566	385,001	46,159	23,396	169,031	167,548	36,790	191,881	171,161	46,050	1,946,345		
16	41,847	390,600	87,677	23,265	121,972	116,127	70,623	158,631	114,889	47,597	1,746,646		
17	57,400	377,668	63,744	15,576	170,597	146,529	157,291	137,479	137,479	76,958	1,911,735		
18	69,846	270,387	179,008	16,316	129,578	186,760	275,108	118,594	118,594	422,659	2,348,551		
19	45,474	269,597	17,923	23,267	385,583	109,281	84,898	322,593	171,017	71,619	349,709		
20	39,678	355,070	17,985	28,312	137,084	162,923	191,776	228,960	135,329	72,700	1,949,616		
21	3,054	329,560	28,287	201,290	149,761	159,013	159,013	302,862	96,864	200,630	1,764,196		
22	1,759	385,213	42,621	300,596	118,147	286,472	241,360	125,385	125,385	316,697	2,079,295		
23	54,852	454,511	269,828	379,131	155,072	202,270	300,176	117,511	117,511	634,382	2,764,240		
24	229,847	75,377	106,406	306,203	126,675	110,475	270,123	81,073	81,073	703,855	2,304,322		
25	264,918	424,660	166,506	157,856	83,253	179,898	273,424	559,966	559,966	276,052	2,966,169		
26	380,770	157,243	275,196	65,054	103,263	184,859	255,454	578,303	273,601	273,601	2,556,524		
27	307,713	245,852	204,540	275,267	147,091	196,202	255,672	959,662	203,408	203,408	2,760,916		
28	471,473	180,666	235,925	249,280	132,349	61,750	291,958	648,724	297,460	352,357	2,670,485		
29	203,567	176,016	210,165	32,957	103,347	202,770	308,792	654,318	321,374	321,374	2,565,049		
30	302,631	723,730	319,751	445,634	132,050	151,947	266,477	115,505	371,990	221,245	2,461,575		
31	232,876	319,751	319,751	422,260	422,260	237,874	190,249	190,249	190,249	190,249	1,716,064		
TOTALS	5,039,955	7,702,363	3,983,546	1,873,847	4,852,725	4,768,117	4,793,879	6,885,906	6,106,990	1,630,796	7,570,789	9,832,440	69,131,350
OP DAYS	30	29	31	20	26	20	31	31	30	20	22	31	333
AVERAGE	167,999	265,599	129,276	93,692	173,312	158,604	154,641	222,126	210,233	81,540	344,327	317,175	195,590
MAXIMUM	411,473	544,511	392,720	278,239	445,634	458,445	286,473	416,721	654,318	377,277	703,855	442,122	2,670,485
MINIMUM	3,054	41,068	17,923	5,442	1,370	76,536	34,534	20,773	61,950	46,050	76,000	13,221	1,371,448

OVER SIZED DOCUMENTS

PW Balliet James

From: dispatch1@entemail.net  
Sent: Wednesday, June 23, 2004 6:52 PM  
To: PW Balliet James  
Subject: Dispatch Answering Service



Message :  
Caller Name: LINDA DAVID  
Call Back Phone #: (610)740-0637  
Reason For Call: WATER PUMP BEHIND VET CLINIC GOING FULL BLAST PLS ADJUST

Message History:  
2004-06-23 18:51:32 nadieene created  
2004-06-23 18:51:35 nadieene deliver done (Fax: 6103981068) filed to go  
out now  
2004-06-23 18:51:36 nadieene deliver done (Email:  
hermans@southwhitehalltwp.org Dispatch Answering Service 0)

*SHUT DOWN @ 1815 - CHECK 1/2 hr before call*

*ON - 1:30 pm  
OFF - 18:15 pm*

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JAN 08 2007

PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

DOCUMENT  
FOLDER

DOCKETED  
JAN 08 2007

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Docket No. C-20055501

PPL Electric Utilities Corporation

Statement No. 1

Testimony of Kristie M. Rippke

RECEIVED  
2001 JAN -8 AM 8:59  
PA P.U.C. BUREAU  
SECRETARY'S BUREAU

DOCUMENT  
FOLDER

**DOCKETED**  
JAN 0 8 2007

Date: November 14, 2006

C-20055501  
11/30/06, PHILA

1 Q. Please state your full name and business address.

2 A. My name is Kristie M. Rippke. My business address is 827 Hausman Road, Allentown,  
3 Pennsylvania, 18104.

4  
5 Q. By whom are you employed and in what capacity?

6 A. I am employed by PPL Electric Utilities Corporation ("PPL Electric" or the "Company")  
7 a subsidiary of PPL Corporation. I work in the Field Services Department of PPL  
8 Electric, and my title is Support Engineer.

9  
10 Q. Please describe your primary responsibilities in that position.

11 A. As Support Engineer, Field Services, I am responsible for the reliability and maintenance  
12 of the distribution system in my assigned territory. This includes ensuring proper  
13 voltages on the system, reducing the number of outages, overseeing preventive  
14 maintenance programs and responding to power quality complaints. I am also  
15 responsible for measuring electro-magnetic fields ("EMF") in my assigned territory.

16  
17 Q. What is your educational background?

18 A. I received a BS in Electrical Engineering from Lafayette College in 2000. I also took the  
19 Power Technology Course from Siemens Power Transmission & Distribution, Inc. Power  
20 Technologies International in 2005.

21  
22 Q. Are you a registered Professional Engineer?

1 A. Yes. I received my Professional Engineer certification in the Commonwealth of  
2 Pennsylvania in 2006. My registration number is PE073826. From 2000 to 2006 I was  
3 certified as an Engineer in Training, and my registration number was ET006871.  
4

5 Q. Please describe your professional experience.

6 A. From 2000-2001, I was in the Engineering Leadership Development Program at  
7 Lockheed Martin Corporation, in Moorestown, New Jersey. In 2001, I joined PPL  
8 Electric as an Engineer. In 2003, I was promoted to my current position of Support  
9 Engineer.  
10

11 Q. Are you a member of any professional organizations?

12 A. Yes, I am a member of the Institute of Electrical and Electronics Engineers, Inc.  
13 ("IEEE"), IEEE-PES (Power Engineering Society), and the Delaware Valley Power  
14 Quality Group.  
15

16 Q. Do you review any professional publications on a regular basis?

17 A. Yes, I keep up to date with the latest developments in electrical engineering by reviewing  
18 multiple professional publications such as Transmission & Distribution World, EC&M –  
19 The Magazine of Electrical Design, Construction & Maintenance, IEEE Spectrum  
20 Magazine, IEEE Power & Energy Magazine and Power Quality News Beat.  
21

22 Q. Have you previously testified as a witness before the Pennsylvania Public Utility  
23 Commission ("PUC")?

1 A. No.

2

3 Q. Are you familiar with Ms. David's complaint in this proceeding?

4 A. Yes. Ms. David's primary complaint in this proceeding concerns a water pumping  
5 station that is operated by the South Whitehall Township Authority ("Township  
6 Authority"). Ms. David alleges that vibrations from the pumping station are causing  
7 damage to her home. According to Ms. David, the pumps at the pumping station are not  
8 insulated, and as a result, Ms. David speculates that electricity is coming from the  
9 pumping station through her water pipes and is causing electrical impulses through her  
10 furniture and producing an electro-magnetic field. Ms. David has also speculated that  
11 PPL Electric's service to her residence may be causing electrical impulses or EMF.

12

13 Q. What is the purpose of your testimony in this proceeding?

14 A. The purpose of my testimony is to respond to the allegations made by Ms. David in this  
15 proceeding regarding PPL Electric's electric service to her residence and to the pumping  
16 station owned by the Township Authority. As explained in detail below, PPL Electric  
17 has investigated its electric service to Ms. David's residence and to the pumping station  
18 that is located near Ms. David's residence and has determined that PPL Electric's service  
19 to both Ms. David and the pumping station is safe, reasonable and meets all applicable  
20 safety code provisions. PPL Electric's service both to Ms. David and to the pumping  
21 station is not causing a safety concern to Ms. David or to any member of the public.

22

1 Q. When did PPL Electric first become aware of Ms. David's concerns regarding her electric  
2 service?

3 A. I have reviewed PPL Electric's business records, and these records indicate that Ms.  
4 David contacted PPL Electric on June 4, 2004 to report that she felt as if she was  
5 experiencing EMF in her house. I was notified of Ms. David's call to PPL Electric on  
6 June 4, 2004.

7  
8 Q. What did you do in response to this call?

9 A. In response to this call from Ms. David, I scheduled an appointment with Mr. Alan Loch  
10 to measure the EMF at Ms. David's residence. Mr. Loch was hired by Ms. David to  
11 perform testing at her house. On June 8, 2004, I went to Ms. David's house and took  
12 EMF readings. Mr. Loch was present when I performed this testing. The results of my  
13 EMF measurements are shown on PPL Exhibit No. 1 which is attached hereto. The  
14 magnetic field strength was determined using the EMDEX II measurement system. The  
15 measurements are in milligauss ("mg"), or thousands of a gauss, and represent the density  
16 of the invisible magnetic lines of force present to the meter for that specific location and  
17 time. The EMF measurements varied from 1.7 mg East, 5 feet from the water pipe shut-  
18 off to 20 mg directly in front of Ms. David's water meter.

19  
20 In my experience as an Engineer and as a Support Engineer at PPL Electric, I have  
21 measured EMF at customers' residences on many occasions. The readings that I obtained  
22 from Ms. David's residence are typical of what I find in other residential settings and are  
23 very low. It is important to note that EMF is created by all types of electrical appliances

1 and devices, such as refrigerators, televisions, and microwaves. EMF is also created by  
2 the electrical wiring in homes. The EMF readings that I measured in Ms. David's home  
3 are not abnormal and do not present a safety concern. I also note that a large body of  
4 scientific research does not indicate that magnetic fields are harmful.

5  
6 Q. Did you perform any other tests at Ms. David's house?

7 A. Yes, based upon Ms. David's concerns, I also agreed to conduct a stray voltage study to  
8 measure stray voltage at Ms. David's residence. On June 17, 2004, I went to Ms. David's  
9 residence again and conducted a stray voltage investigation. The results of my stray  
10 voltage investigation are attached hereto as PPL Exhibit No. 2. First, I measured the  
11 voltage between the neutral conductor in Ms. David's meter base and ground across a  
12 500 ohm resistor and read 0.13 Volts. Next, I measured stray voltage around Ms.  
13 David's home from ground to ground spaced about six feet apart, again across a 500 ohm  
14 resistor which is standard practice. The highest measurement that I found was 0.0029  
15 Volts, and this measurement was taken in Ms. David's backyard between her patio and  
16 deck. Typically, values less than 1 Volt are not of a concern. The voltage measurements  
17 taken at Ms. David's residence are much lower than 1 Volt and are not of a concern to  
18 Ms. David's safety or the safety of the public.

19  
20 Q. Did you perform any follow-up testing at Ms. David's residence?

21 A. Yes, after Ms. David filed her Complaint with the Pennsylvania Public Utility  
22 Commission, we performed additional testing at her residence and at the pumping station  
23 to confirm that PPL Electric's service was safe and reasonable. On June 30, 2006, I went

1 to Ms. David's residence again to perform additional testing. I took EMF measurements  
2 in the same manner that I took them in 2004. The results of my second EMF  
3 investigation are attached hereto as PPL Exhibit No. 3. This time the EMF readings  
4 varied from 0.9 mg to 9.2 mg. I measured 9.2 mg on the inside wall of Ms. David  
5 residence near her water meter. As explained above, the large body of scientific evidence  
6 does not demonstrate that magnetic fields are harmful. In addition, the levels that I found  
7 in Ms. David's residence are typical of levels found in residential dwellings and are very  
8 low.

9  
10 In addition to measuring EMF, I also conducted another stray voltage investigation. The  
11 results of my second stray voltage investigation are attached hereto as PPL Exhibit No. 4.  
12 I measured the voltage between the neutral conductor in Ms. David's meter base and the  
13 ground across a 500 ohm resistor and found 0.0225 Volts. Next, I took measurements  
14 around Ms. David's home approximately 6 feet apart, again with a 500 ohm resistor  
15 which is standard practice. The highest measurement taken was 0.0098 Volts in Ms.  
16 David's front yard across the sidewalk. As explained above, values less than 1 Volt are  
17 typically not of a concern. The measurements taken at Ms. David's residence are much  
18 less than 1 Volt and would not be noticeable or harmful.

19  
20 In addition to measuring EMF and stray voltage, I also measured the voltage at Ms.  
21 David's meterbase with a recording voltmeter to determine if there were any problems  
22 with her electric service. The results of this voltage study are attached hereto as PPL  
23 Exhibit No. 5. I recorded the voltages to Ms. David's house using a Metrosonics MR-4

1 Meter Adaptor Recorder during the time period from July 11, 2006 at 12:56 p.m. to July  
2 18, 2006 at 1:11 p.m. The recording voltmeter measured the voltage that was delivered  
3 to Ms. David's residence continuously during this one-week time period. Other than for  
4 a brief time when a circuit breaker protecting another line tripped during a thunder and  
5 lightning storm, the voltage to Ms. David's home was within 124.5V and 117.8V.

6 During the thunderstorm, there were a total of six .1 second or less sags outside of this  
7 voltage range within 3.5 minutes due to the switching at the substation. These voltage  
8 levels meet the requirements of the Commission's regulations, are typical of voltage  
9 levels provided to residential customers and show no problems with Ms. David's electric  
10 service.

11  
12 Also, on July 11, 2006, PPL Electric performed a test to ensure the integrity of the neutral  
13 connection from Ms. David's meter base to the transformer that serves her residence.  
14 PPL Electric tested this connection with "The Super Beast" model HJA-469 service  
15 conductor tester. The tester applies approximately 20 Amps to one of the phases and  
16 measures the corresponding phase A and phase B voltages. There was no voltage  
17 difference measured between the two phases during the test, and these results indicate  
18 that the neutral connection at Ms. David's residence is good.

19  
20 Based upon the extensive testing that PPL Electric conducted at Ms. David's residence  
21 both in 2004 and in 2006, I conclude that PPL Electric's service to Ms. David's residence  
22 is adequate, efficient, safe and reasonable. I also conclude that the transformer that  
23 serves Ms. David's residence is adequate, efficient, safe and reasonable.

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23

Q. Did you perform any tests at the pumping station located near Ms. David's residence?

A. Yes, based upon Ms. David's concerns, I also conducted a stray voltage study to measure stray voltage at the pumping station located at 3030 Hamilton Boulevard. On November 9, 2006, I went to the pumping station and conducted a stray voltage investigation. The results of my stray voltage investigation are attached hereto as PPL Exhibit No. 6. First, I measured the voltage between the neutral conductor in the meter base and ground across a 500 ohm resistor and read 0.0088 Volts. Next, I measured stray voltage around the pumping station from ground to ground spaced about six feet apart, again across a 500 ohm resistor which is standard practice. The highest measurement that I found was 0.0267 Volts, and this measurement was taken at the northeast corner of the pump house between the building and the sidewalk. Typically, values less than 1 Volt are not of a concern. The voltage measurements taken at the pump house are much lower than 1 Volt and are not of a concern to Ms. David's safety or the safety of the public. I would like to note that although the voltage measurements on the back side of the pump house, opposite the parking lot, were higher in value than the measurements taken at the front of the pump house, this can be explained by the fact that the ground in the back was in the shade and was very moist. Moist soil would produce higher voltage readings than dry soil and since the reading are well under 1V, it does not suggest that there is any problem with stray voltage.

In addition to measuring stray voltage, I also measured the voltage at the pumping station meterbase with a recording voltmeter to determine if there were any problems with their

1 electric service. The results of this voltage study are attached hereto as PPL Exhibit No.  
2 7. I recorded the voltages to the pumping station using a Metrosonics PA-9 Power  
3 Analyzer during the time period from November 7, 2006 at 9:21 a.m. to November 14,  
4 2006 at 7:15 a.m. The recording voltmeter measured the voltage that was delivered to the  
5 pumping station continuously during this one week time period, except for a brief time  
6 when I stopped the meter to check the readings. The voltage to the pump house was  
7 within 126.36V and 121.17V during this time period. These voltage levels meet the  
8 requirements of the Commission's regulations, are typical of voltage levels provided to  
9 this type of customer and show no problems with the pump house's electric service.  
10

11 Q. At the deposition held on October 26, 2006, Mr. Alan Loch, witness for Linda David  
12 alleged that there is current flowing in the water pipe in Ms. David's house that is  
13 producing a magnetic field. (Deposition Tr. p. 79) Do you have any response to his  
14 statements?

15 A. Yes, I do. If there is current flowing through the water pipe, it is possible that it is  
16 creating a magnetic field or EMF. However, based upon the measurements that I took at  
17 Ms. David's residence, the EMF is very low and would not present a safety concern. In  
18 addition, any potential problems created by this situation would not be PPL Electric's  
19 responsibility but rather Ms. David's responsibility. PPL Electric's customers are  
20 responsible for the wiring in their homes, including proper grounding. Under the terms  
21 and conditions of PPL Electric's tariff, Rule 5, Section A, "The customer assumes full  
22 responsibility for the energy and facilities at and beyond the point of delivery." In  
23 addition, Rule 4, A(5) provides:

1 The point of delivery is the point designated by Company where  
2 Company's service conductors are connected to customer's service  
3 entrance conductors, terminals or bus. Company installs and maintains  
4 facilities to the point of delivery and shall not be required to install or  
5 maintain any conductors, meter base, equipment or apparatus except meter  
6 and meter accessories beyond that point.  
7

8 (A copy of the applicable provisions of Rules 4 and 5 of PPL Electric's tariff are attached  
9 hereto as PPL Exhibit No. 8.) The point of delivery for Ms. David is outside of her  
10 house, before her meter. Any potential problems with electric current in Ms. David's  
11 water pipe are beyond the delivery point and are clearly her responsibility.  
12

13 I note that in his deposition, Mr. Loch stated that he did not reach any conclusion  
14 regarding where the electrical current in the water pipe was coming from. Mr. Loch  
15 speculated that it might be coming from outside sources, such as other people's homes,  
16 but he did not reach any conclusion as to the source. I also note that Mr. Loch stated that  
17 he did not believe that PPL Electric's transformer was faulty or that PPL Electric's  
18 service to Ms. David's residence was faulty. Deposition Tr. p. 85. It is important to note  
19 that the EMF measured at Ms. David's water meter which is on the main water line  
20 coming into her home was 20 mg. This magnitude of EMF is less than what would  
21 normally be measured from many typical appliances in a residential home.  
22

23 It is also important to note, that consistent with the discussion above, Mr. Loch's  
24 proposed solution to Ms. David's alleged problems would be to install better grounding  
25 for Ms. David's electric service and install an insulated section of pipe in Ms. David's  
26 water pipe so that current could not flow through it. Deposition Tr. p. 69. This testimony

1 further demonstrates that any problems that Ms. David may be having are beyond the  
2 point where PPL Electric delivers electricity to Ms. David. As stated above, under the  
3 terms and conditions of PPL Electric's tariff, Ms. David is responsible for the electricity  
4 and facilities on her side of the delivery point.  
5

6 Q. In her deposition testimony, Ms. David states that she experiences the electrical problems  
7 in her house but not outside. Deposition Tr. pp. 22-23. Do you have any response to  
8 these statements?

9 A. Yes. This testimony also demonstrates that the electrical problems that Ms. David claims  
10 to be experiencing, if anything, involve the wiring in her house and, are therefore, her  
11 responsibility.  
12

13 Q. In this proceeding, Ms. David alleges that she feels electric current coming through her  
14 furniture, including wooden furniture. Is this possible?

15 A. I understand that Ms. David claims to feel electricity surging through her wooden  
16 furniture, however, this is simply not possible. Electricity does not flow through wood. I  
17 note that Ms. David also claims that she could feel electrical impulses coming through  
18 her car. This is also highly unlikely because electricity does not flow through rubber.  
19 Given these statements by Ms. David, it is highly probable that she is not feeling  
20 electricity but something else.  
21

1 Q. In this proceeding, Ms. David stated that PPL Electric installed a coil on Hamilton  
2 Boulevard and that it was intended to fix the problems she's experienced. Do you have  
3 anything to say in response to this statement?

4 A. Yes. I am not aware of any type of device that could be described as a coil that PPL  
5 Electric could install on the line. I know that PPL Electric never installed any devices or  
6 equipment on Hamilton Boulevard in response to Ms. David's complaints. I checked  
7 along Hamilton Boulevard and found one location in front of the Veteran's Hospital that  
8 had a coil, but it was a coil of wire belonging to a communication company and would  
9 have nothing to do with Ms. David's complaint or with PPL Electric's equipment.  
10

11 Q. Does this conclude your testimony at this time?

12 A. Yes, it does.

PPL Electric Utilities  
827 Hausman Road  
Allentown, PA 18104-9392  
Tel 484-634-3100 Fax 484-634-3767  
kmreadinger@pplweb.com



June 9, 2004

Linda David  
2922 Fairview Street  
Allentown, PA 18103

RECEIVED

JAN 08 2007

Dear Ms. David,

PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

The attached map contains the location and the EMF readings taken on 6/8/04 at 2922 Fairview Street, Allentown, PA. The measurements were performed between 3.30 PM and 4.45 PM. Since magnetic field levels can change as the amount of electrical current changes, readings taken on other days or at other times on the same day may vary.

The magnetic field strength was determined using the EMDEX II measurement system. The measurements shown on the attached sketch are in milligauss (mg), or thousandths of a gauss and represent the density of the invisible magnetic lines of force present to the meter for that specific location and time. In reviewing the data provided, the highest magnetic field strength recorded at the site, 20 mg, was found directly in front of the water meter.

Scientific Panels that have reviewed the research on magnetic fields produced by power lines and appliances have drawn two main conclusions. First, additional research is needed to explore concerns raised by some of the studies, and secondly, the large body of scientific evidence does not demonstrate that magnetic fields are harmful. Given those findings, PPL is taking a reasoned approach in responding to the EMF issue. We are supporting additional research and are also reducing magnetic field levels in new power lines when it can be done at no or low cost. Additionally, when requested, we are providing information on the EMF subject to our customers and employees.

If you have any questions on the results of the measurements or need further assistance, please call me at (484) 634-3100.

Attachment

Sincerely,

*Kristie M. Readinger*

Kristie M. Readinger  
Support Engineer, Field Services

**DOCKETED**

JAN 08 2007

DOCUMENT  
FOLDER



PPL Electric Utilities  
827 Hausman Road  
Allentown, PA 18104-9392  
Tel: 484-634-3100 Fax: 484-634-3767  
kmreadinger@pplweb.com



June 22, 2004

RECEIVED

Linda David  
2922 Fairview Street  
Allentown, PA 18103

JAN 08 2007

PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

Dear Ms. David,

We conducted a stray voltage investigation at your home on 6/17/04 between 1:00PM and 2:30PM. First we measured the voltage between the neutral conductor in your meter base and ground across a 500 ohm resistor and read 0.13 Volts. Next we took measurements around your home from ground to ground spaced about 6 feet apart. These also were measured across a 500 ohm resistor, as is standard practice. Included is a diagram of the measurements we found. The highest measurement was taken in your backyard between the patio and deck and was 0.0029 Volts. All of the measurements taken are very low and would not be noticeable. Typically values less than 1 Volt are not of a concern. As you can see, the measurements we found are much less than that limit.

If you have any questions concerning this report, please do not hesitate to call me at (484) 634-3100.

Thank-you.

Attachment

Sincerely,

Kristie M. Readinger  
Support Engineer, Field Services

DOCUMENT  
FOLDER

DOCKETED

JAN 08 2007

C-20055501  
11/30/06, PHILA



PPL Electric Utilities  
827 Hausman Road  
Allentown, PA 18104-9392  
Tel. 484-634-3100 Fax: 484-634-3767  
kmrippke@pplweb.com



June 30 2006

RECEIVED

Linda David  
2922 Fairview Street  
Allentown, PA 18103

JAN 03 2007

PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

Dear Ms. David,

The attached sheet contains the location and the EMF readings taken on 6/30/06 at 2922 Fairview Street, Allentown, PA. The measurements were performed between 7:05 AM and 7:30 AM. Since magnetic field levels can change as the amount of electrical current changes, readings taken on other days or at other times on the same day may vary.

The magnetic field strength was determined using the EMDEX II measurement system. The measurements shown on the attached sheet are in milligauss (mg), or thousandths of a gauss and represent the density of the invisible magnetic lines of force present to the meter for that specific location and time. In reviewing the data provided, the highest magnetic field strength recorded at the site, 9.2 mg, was found on the inside wall near the water meter.

Scientific Panels that have reviewed the research on magnetic fields produced by power lines and appliances have drawn two main conclusions. First, additional research is needed to explore concerns raised by some of the studies, and secondly, the large body of scientific evidence does not demonstrate that magnetic fields are harmful. Given those findings, PPL is taking a reasoned approach in responding to the EMF issue. We are supporting additional research and are also reducing magnetic field levels in new power lines when it can be done at no or low cost. Additionally, when requested, we are providing information on the EMF subject to our customers and employees.

If you have any questions on the results of the measurements or need further assistance, please call me at (484) 634-3100.

Attachment

DOCUMENT  
FOLDER

Sincerely,

Kristie M. Rippke  
Support Engineer, Field Services

**DOCKETED**

JAN 08 2007

PPL Ex 3, p 1

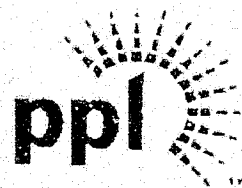
C-20055501  
11/30/06, PHILA

## Table of EMF Measurements

For: Linda David  
 Site: 2922 Fairview St., Allentown  
 Date: 6/30/2006  
 Time: 7 05 AM

Location	Field Strength (mg)
Family Room	1.5
Family Room (on floor)	1.3
Kitchen	1.2
Kitchen (on floor)	1.6
Dining Room	1.3
Dining Room (on floor)	1.2
Living Room	1.7
Living Room (on floor)	1.8
Inside Wall near water meter	9.2
Back Bedroom	1.1
Back Bedroom (on floor)	1.0
Middle Bedroom	1.1
Middle Bedroom (on floor)	1.0
Bathroom	1.2
Bathroom (on floor)	0.9
Master Bedroom	1.1
Master Bedroom (on floor)	1.1
Pink Chair in Master Bedroom	0.9
Master Bathroom	1.3
Master Bathroom (on floor)	1.2
Laundry Room	1.8
Laundry Room (on floor)	1.8
Garage	2.7
Garage (on floor)	1.9
Back Deck (on loveseat)	1.1
Back Deck (on floor)	1.1
Back Yard	1.1
Back Yard (on ground)	1.0
Back Yard (top of hill)	1.3
Back Yard (top of hill on ground)	1.1
Side Yard (by Laundry Room)	1.4
Side Yard (on ground)	1.0
Front Yard	2.1
Front Yard (on ground)	2.4
Side Yard (by Bedrooms)	1.0
Side Yard (on ground)	1.0

PPL Electric Utilities  
827 Hausman Road  
Allentown, PA 18104-9392  
Tel. 484-634-3100 Fax: 484-634-3767  
kmrippke@pplweb.com



June 30, 2006

RECEIVED

Linda David  
2922 Fairview Street  
Allentown, PA 18103

JAN 08 2007

PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

Dear Ms. David,

We conducted a stray voltage investigation at your home on 6/30/06 between 7:45 AM and 9:30 AM. First we measured the voltage between the neutral conductor in your meter base and ground (~6 feet away) across a 500 ohm resistor and read 0.0225 Volts. Next we took measurements around your home from ground to ground spaced about 6 feet apart. These also were measured across a 500 ohm resistor, as is standard practice. Included is a diagram of the measurements we found. The highest measurement was taken in your front yard across the sidewalk and was 0.0098 Volts. All of the measurements taken are very low and would not be noticeable. Typically values less than 1 Volt are not of a concern. As you can see, the measurements we found are much less than that limit.

If you have any questions concerning this report, please do not hesitate to call me at (484) 634-3100.

Thank-you.

Attachment

DOCUMENT  
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Sincerely,

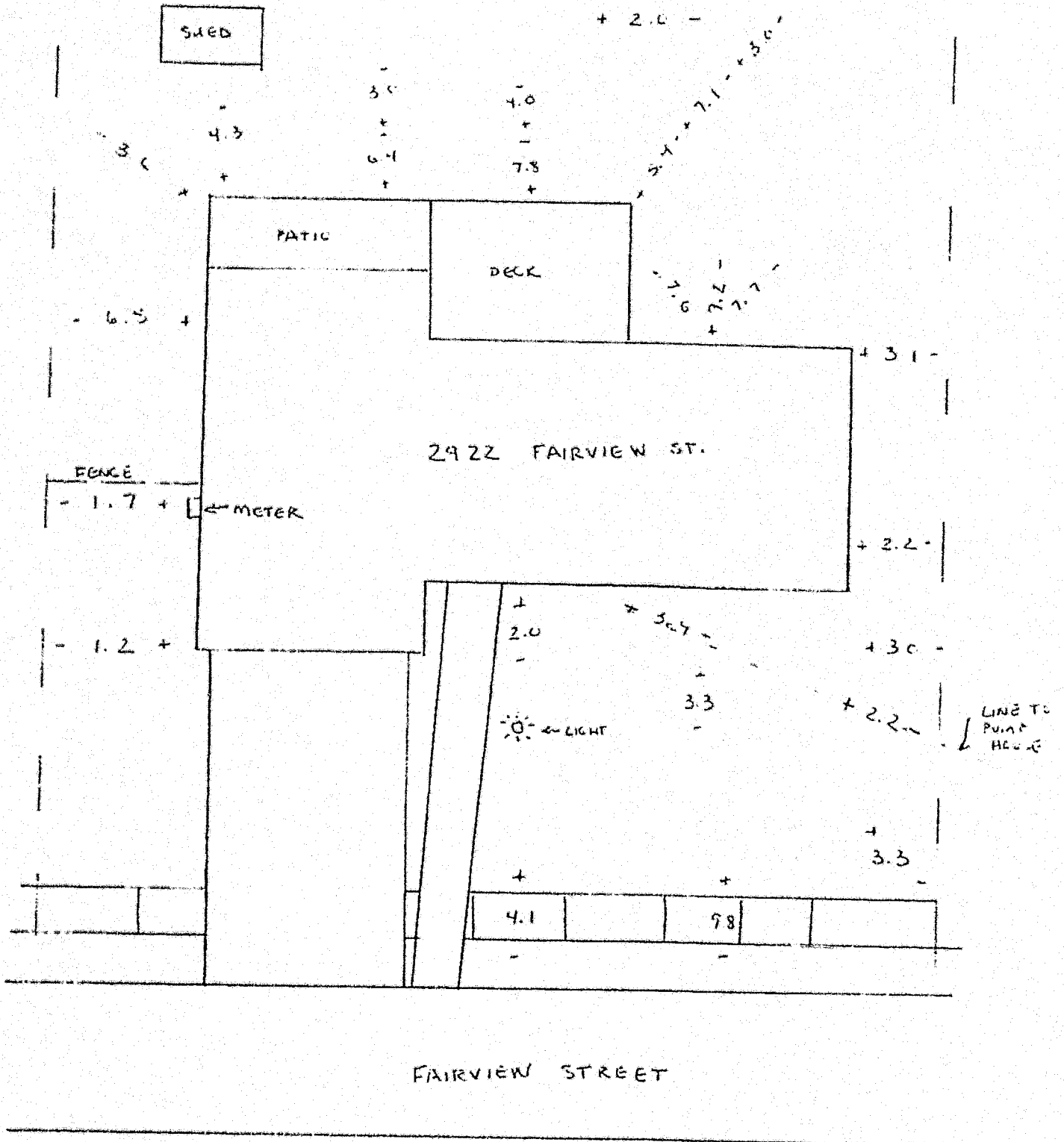
Kristie M. Rippke  
Support Engineer, Field Services

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JAN 08 2007

C-20055501  
11/30/06, PHILA

PPL Ex. 4, p. 1

### Diagram of Stray Voltage Measurements Recorded 6/30/2006 at 2922 Fairview Street, Allentown



ALL MEASUREMENTS SHOWN IN MILLIVOLTS (mV).

1 VOLT = 1,000 mV

1 mV = 0.001 VOLTS

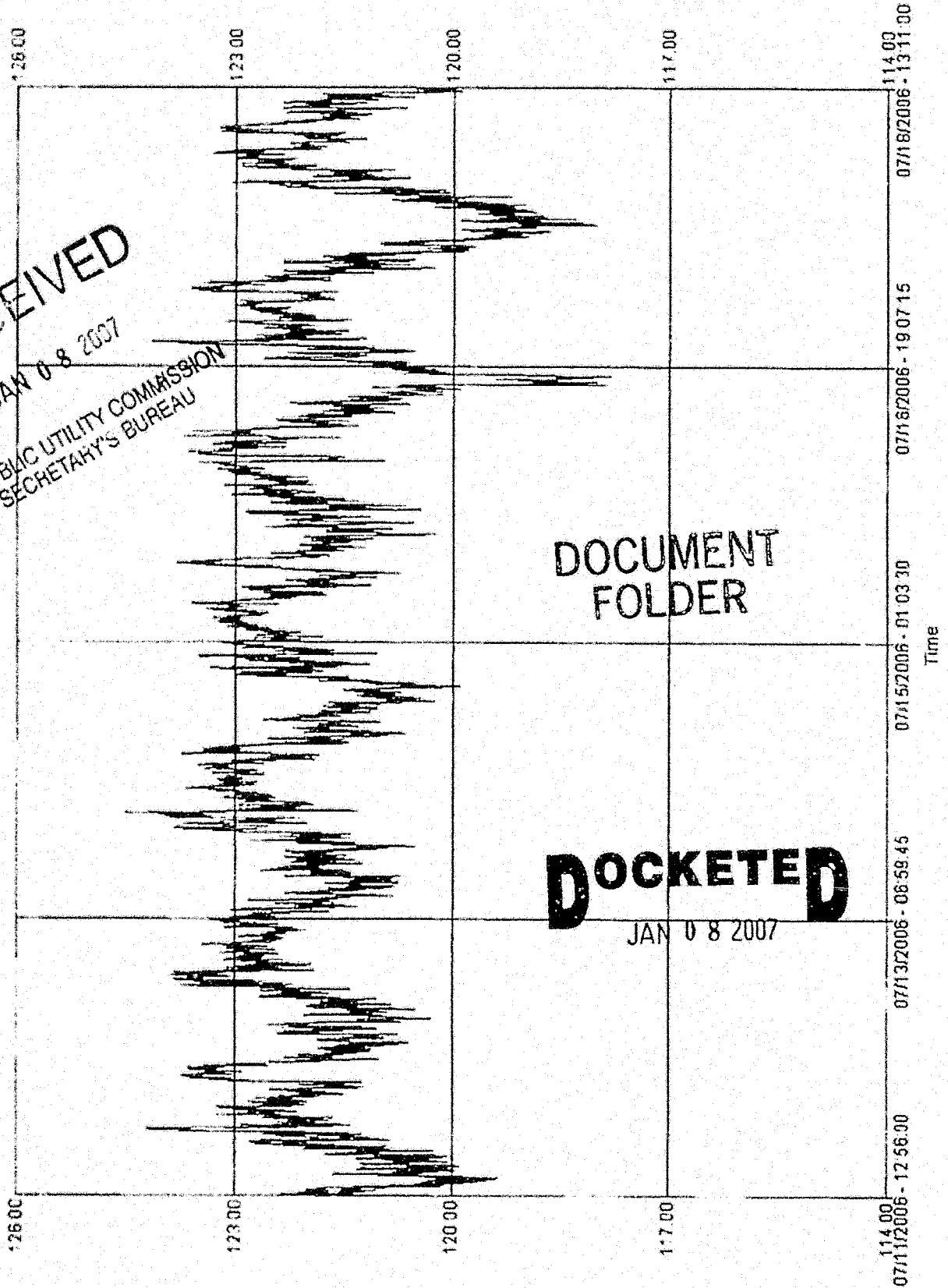
Linda David - RMS Voltage

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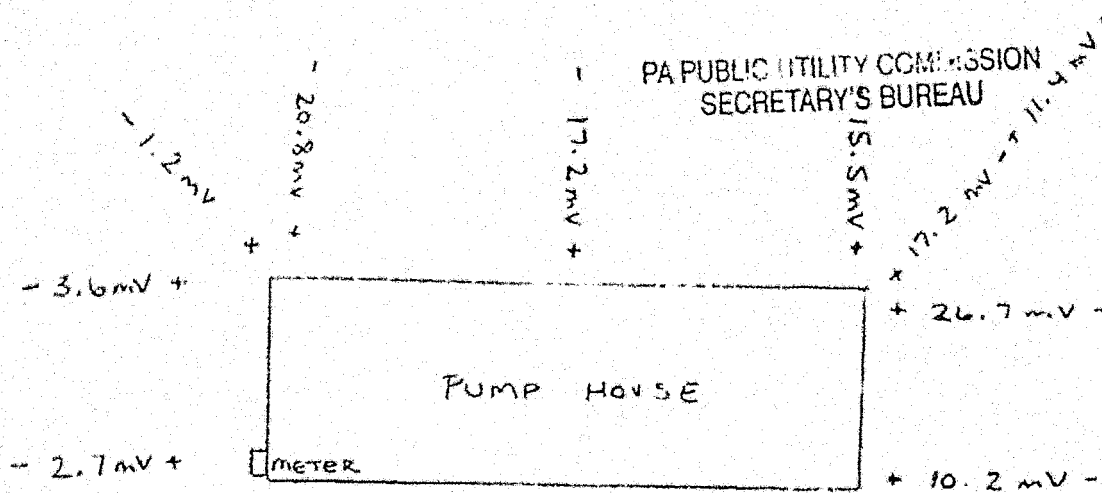
Diagram of Stray Voltage Measurements Recorded 11/9/2006 at 3030 Hamilton Blvd., Allentown

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PARKING LOT

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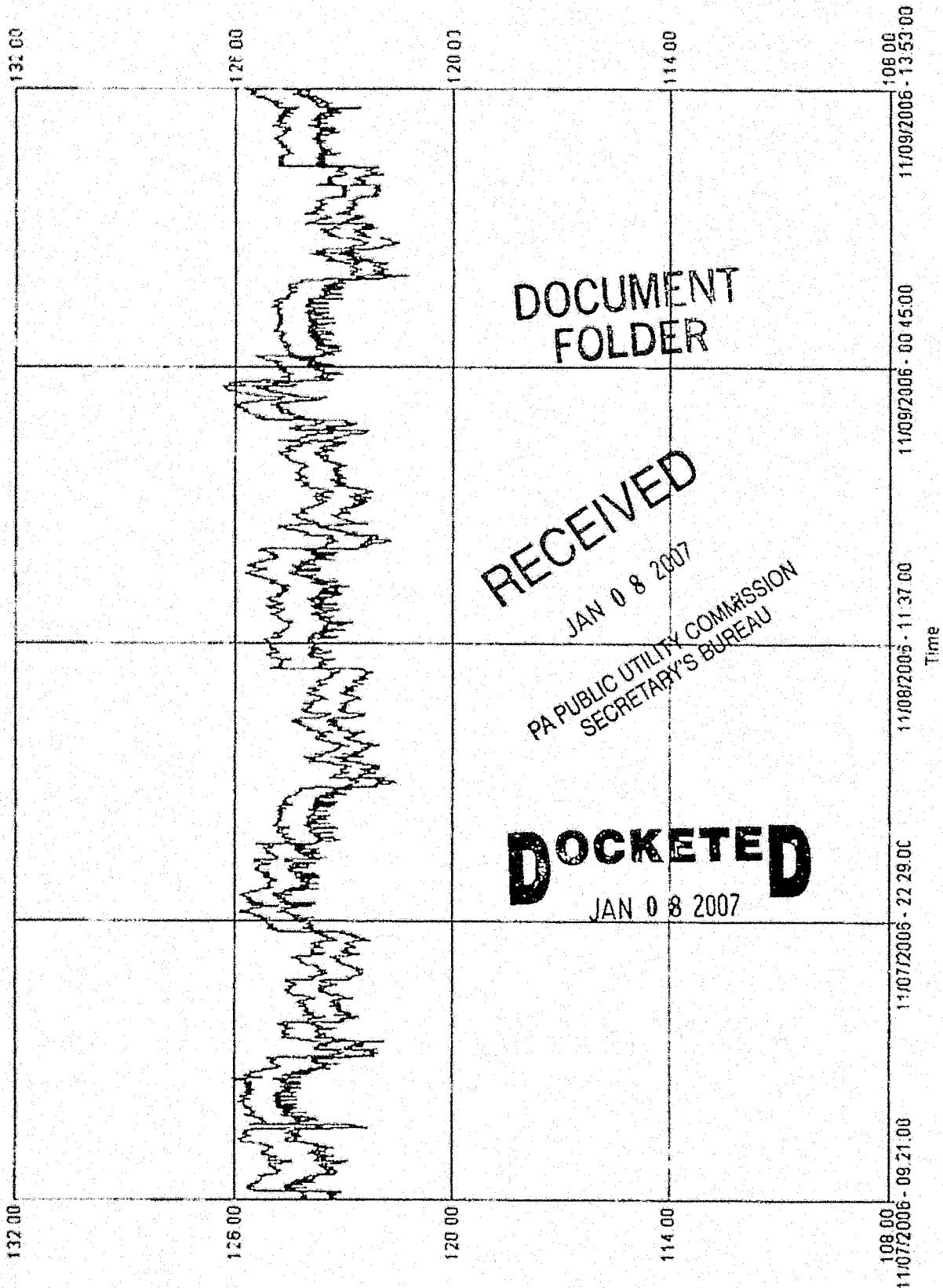
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Vb RMS (Volts)

South Whitehall Pump House - RMS Voltages

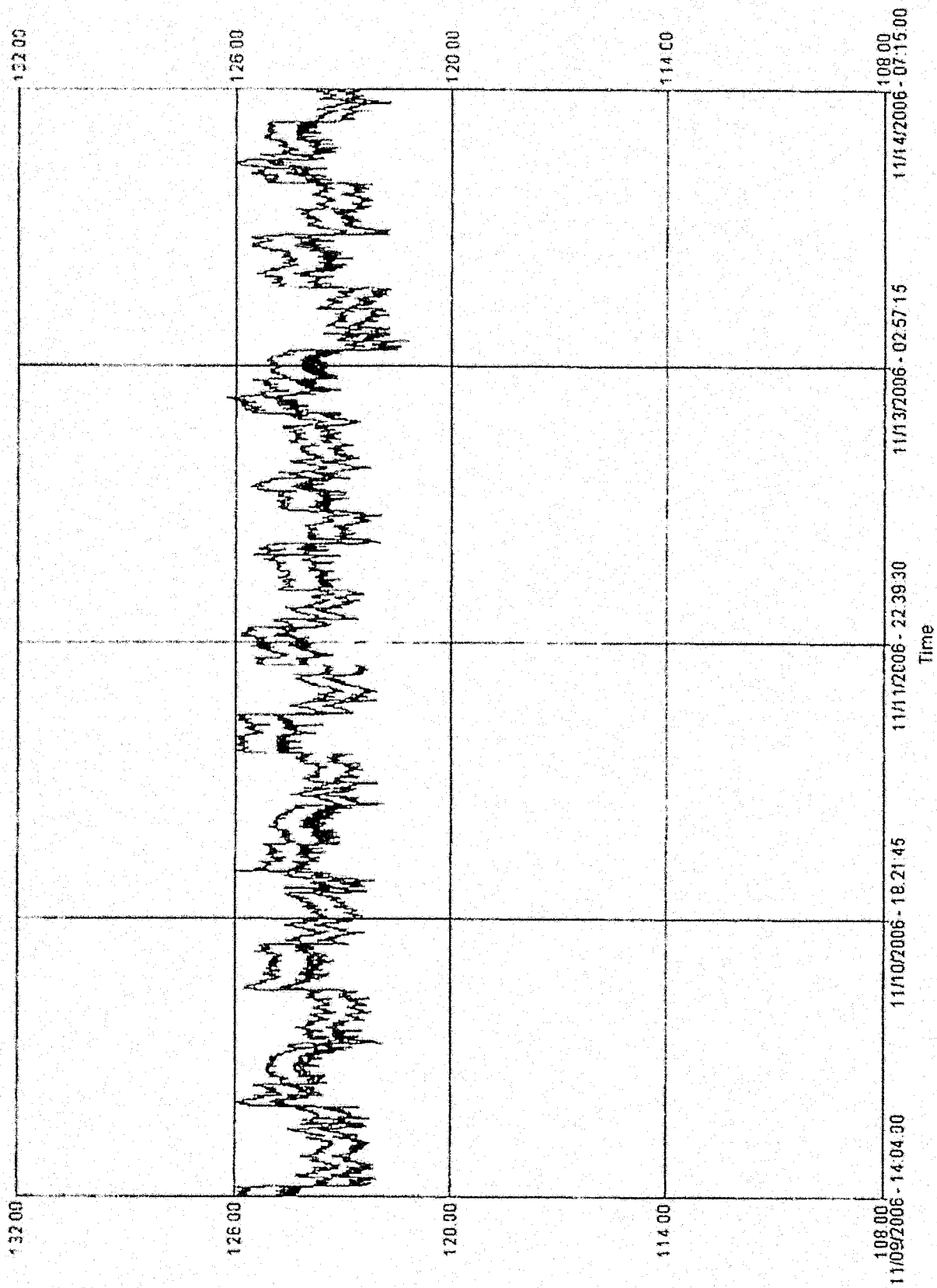


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PPL Ex. 7. p. 1

Va RMS (Volts)

South Whitehall Pump House - RMS Voltages



RULES FOR ELECTRIC SERVICE  
RULE 4 - SUPPLY OF SERVICE

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A CHARACTERISTICS OF SERVICE

(1) The Company's standard service is single or three phase, sixty Hertz, alternating current at standard voltages as specified in the Company's "Rules for Electric Meter and Service Installations". All nonstandard service is in the process of elimination and no new or additional nonstandard service will be supplied

(2) When a rate schedule specifies service at secondary voltage or specifies no particular voltage, Company furnishes, where necessary, one standard transformation at the point of delivery from the line voltage to a standard secondary voltage. Where the rate schedule specifies service at 12,000 volts or higher, service is supplied from the nearest available line of not less than that voltage and customer furnishes all equipment necessary to transform the energy from the line voltage.

(3) The Company extends service facilities from its distribution lines to the customer's point of delivery. The customer pays the estimated cost of service extension length over 500 ft. and the estimated additional cost of facilities other than those which the Company would normally install to meet the customer's load requirements. (C)

(4) The Customer provides, without charge to the Company, suitable right-of-way across property owned or controlled by the customer (or property owner) including but not limited to ground line clearing of trees, brush and other obstructions, rough grading, and access by mechanical construction equipment.

(5) The point of delivery is the point designated by Company where Company's service conductors are connected to customer's service entrance conductors, terminals, or bus. Company installs and maintains facilities to the point of delivery and shall not be required to install or maintain any conductors, meter base, equipment or apparatus except meter and meter accessories beyond that point.

(6) The Company normally supplies energy to only one point of delivery to a premises. The Company may provide a separate point of delivery at the customer's request as a speculative line and/or service extension.

B SPECULATIVE SERVICE EXTENSIONS (C)

(1) A service extension is speculative when, in the Company's opinion, there is doubt as to the continued use of the new facilities by the customer. This may include, but is not limited to separate points of delivery, and service at locations which are relatively inaccessible or remote, or where the customer has less investment than is required by the Company to supply service.

(2) When a service extension is speculative, the Company requires a minimum distribution revenue guarantee equal to the Company's estimated fully allocated cost of installation and removal of all facilities less any contribution in aid of construction by the customer. The guarantee is for a five year period or less.

(Continued)

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(C) Indicates Change

RULES FOR ELECTRIC SERVICE

RULE 5 - USE OF SERVICE

A. CUSTOMER'S RESPONSIBILITY

(C)

The customer assumes full responsibility for the energy and facilities at and beyond the point of delivery. Interruption of service and variation in supply characteristics (including, but not limited to, high or low voltage, operation of protection or control devices, single phasing of three phase service, and phase reversal) can occur. To prevent or limit damage from such events it is Customer's responsibility to purchase and install protective devices and/or install or otherwise provide for alternate power supplies that are available from third parties to protect Customer's facilities and property. The customer's use of service shall not cause damage to Company's equipment or impair this service to other customers. The foregoing provisions do not change the Company's duty and responsibility to provide safe and adequate service to the point of delivery.

B. PURPOSE AND LOCATION

Service shall not be used for any purpose or at any location other than that stipulated in the contract or this tariff.

C. PERMANENT CHANGE OF USE

When a customer notifies Company in writing of any permanent change which reduces the capacity Company is required to have available, and when required, executes a new service contract, the Company will as of the first meter reading date thereafter apply the rate schedule applicable to the changed conditions for subsequent billing.

D. SERVICE DURING CONSTRUCTION OR EMERGENCY

(1) The Company suspends the contract term for a period not exceeding six consecutive months--

(a) following the initial connection of service for gradual installation of equipment or development of customer's operation as contemplated under the contract.

(b) upon written request from the customer following a forced temporary suspension of a portion of all of customer's operation due to an emergency such as an accident, fire, flood or other act of God, but not due to strike, lockout, seasonal curtailment or other business conditions.

(2) Bills for service during the suspension period are based on demands and energy supplied during such period applying the rates and minimum charges of the applicable rate schedule most advantageous to the customer. When the period in which the suspension starts is less than a normal billing period, bills are prorated. The suspension period ceases with the billing month in which the establishment or restoration of normal service occurs or after six full billing months whichever is the earlier. The initial contract term is extended for an equal period, including any extension guarantee period required thereunder.

(Continued)

(C) Indicates Change

RULES FOR ELECTRIC SERVICE  
RULE 5 - USE OF SERVICE (CONTINUED)

(C)

E. ABNORMAL DEMAND AND USAGE

All metered demands and usage, including abnormal demands and usage which are inconsistent with the customer's normal use pattern, are billed as metered in the billing period in which they occur. This provision may be waived at the Company's option.

F. REDISTRIBUTION OF SERVICE

(1) Energy purchased from the Company shall not be submetered and resold to another party except as permitted under 5F(2) and 5F(4). It is the Company's intent to meter and bill each tenant as an individual customer. Tenant is defined as an occupant of a multi-tenancy commercial building or parcel where it is expected that tenure shall be for a year or more. For the purpose of this rule, the term multi-tenancy commercial building shall include any structure which contains or houses 3 or more separate and distinct residential or commercial units.

(2) Where installation of electric service was completed by May 21, 1980, electric energy may be redistributed and submetered to tenants provided service to the premises is to one point of delivery through a single meter under the applicable general rate schedule, and charges for electric service to such tenants do not exceed charges as computed under the Company's applicable rate schedule for comparable service.

(3) At the service locations covered hereunder connected after May 21, 1980, each tenant shall be served, metered and billed individually by the Company under the appropriate rate schedule except where a definite commitment has been made as of that date to permit master metering with the resale provision of 5F(2). Upon application, affidavit, and proof presented to the Company, any owner (or his duly authorized representative) of a new multi-tenancy commercial building may seek an exception to Tariff Rule 5(F) by demonstrating that the installation of individual electric meters at each separate unit within the building is neither feasible nor practical from a financial, technical, or engineering point of view or by citing any other valid reason, all of which must be designed to prove that the installation of individual electric meters within the building will not achieve any notable reduction in the consumption of electricity by the tenants in the building beyond that which would be accomplished through the use of a master metering system with efficient heat controls.

(4) Company, at its discretion, may permit submetering for both existing and new service locations in accordance with the resale provisions of 5F(2) when all of the following conditions are present:

- (a) it is impractical for the Company to separately bill each tenant.
- (b) Each tenant has control of the majority of his electric energy use.
- (c) That substantial energy conservation will be effected.

G. VANDALISM

When Company street light facilities at a location are repeatedly vandalized, the customer shall reimburse the Company for all costs to repair such vandalism after the second recorded incident over a consecutive 24 month period.

(C) Indicates Change



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C-20055501  
11/30/06, PHILA

Comments	Employee Number	Contact Information	Date	Contact Type	User Name	Time	Phone	Critical	Expiration Date
wk no bill wfm entered adj rd to bill account 11/3/10 5	F02170	Db	8/30/2006	Billing	DEBBIE BARON	9:55 AM ( )	( )	N	/ /
	E43168	SYSTEM GENERATED	8/23/2006	Cancel Only Service	BARBARA P KIDDA	2:42 PM (610) 740-0637	(610) 740-0637	N	/ /
	E43168	SYSTEM GENERATED	8/23/2006	Cancel Only Service	BARBARA P KIDDA	2:41 PM (610) 740-0637	(610) 740-0637	N	/ /
	E43168	SYSTEM GENERATED	8/23/2006	Change Meter Only Issued	BARBARA P KIDDA	2:38 PM (610) 740-0637	(610) 740-0637	N	/ /
	MDI	SYSTEM GENERATED	8/22/2006	Other Meter Investigation Comple	MDI	2:16 PM (610) 740-0637	(610) 740-0637	N	/ /
meter number here is 91451077 reading - 01336. Action Taken Field Work Completed	E22654	SYSTEM GENERATED	8/17/2006	Other Meter Investigation Issued	JUNE S SCHAFFER	2:37 PM (610) 740-0637	(610) 740-0637	N	/ /
module not communicating outage in june, crew may have chngd meter plz verify meter# or investigate to find out why meter is not communicating. acct in amr failed mtr work q	E22654	ISS	8/17/2006	Meter	JUNE S SCHAFFER	11:43 AM ( )	( )	N	/ /
acct in amr failed mtr work q. contact says k rippke working with crew. i checked with krislie and she said she thinks the crew may have changed the meter here she will check with them to see if she can get the info. if not, will need to issue other mtr investigation order to have serviceman check for meter# here or see if some other problem.	CSSDR044	LINDA DAVID	8/16/2006	Meter	CSSDR044	3:49 AM (610) 740-0637	(610) 740-0637	N	/ /
AMR Ops issued Work Q to F/S - AMR Failed Meter	JLF	SYSTEM GENERATED	6/23/2006	Electric Outage - Issuance	JLF	12:29 PM (610) 740-0637	(610) 740-0637	N	/ /
Cond 1:014 OTHER Cond 2:000 Cond 3:000 Cond 4:000 Note:KRISTIE WILL BE WORKING WITH FOREMAN AND CREW TO INVESTIGATE	DLANDIS	David M Landis	11/3/2005	PUC/Formal	DAVID M LANDIS	8:20 AM ( )	( )	Y	12/1/2007
PUC Formal Complaint Docket No. C-20055501 (also PUC Informal BCS No. 1952987) claims of stray voltage (EMF), referred to Terry Albright/Kristie M. Ripplke to review and send response to OGC. Formal Paperwork was over 50 pages including pictures.	EJ4329	PUC Decision	9/23/2005	PUC/Informal	RJIONDA S WENRICH	4:33 PM ( )	( )	N	/ /