

Certificate Of Service

I do Herby Certify That I have This Day 06 March 2017 I Have Served a true And correct copy of the Letter 06 March 2017 upon The person's and manner Set Forth Below.

Via Fax Exceptions

Kimberly G. Krupka

33 S Seventh Street

P.O. box 4060

Allentown, PA 18105-4060

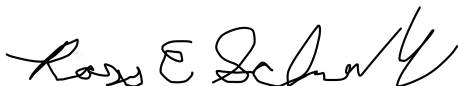
The Honorable Jeffery A. Watson

Piatt Place

Suite 220

301 5th Avenue

Pittsburg, Pa 15222 try to send via email



Ross E. Schell

March 6 2017

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

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

C-2016-2565671

C-2016-2565235

C-2016-2565236

Petition of Exceptions for Judge Watson's initial Decision Dated
3 February 2017.

The proof has been given that my power has gone out at least 500
time since I moved into this house. Yes it has gone out for a minute
or too. But it has been going out at least 2 times a week during this
period. For some reason Judge Watson cannot get this point.

I have caught the witnesses lying in the hearings case in point.
Doing anything before I filed my complaints. Cutting trees, Rigging

against animals. (And I tried to submit this evidence to the PUC only to have the Secretary reject it because she did not want to hear it. Most of the times it has gone off according to the evidence they could not tell me a reason for it going off. This evidence was admitted by PPL's Attorney at most of the hearings. Judge Watson admitted the evidence but evidently never considered it for his decision. In My complaints I cited certain dates individually. But during the hearings I have stated that it was going on and off for 17 years. Ever since I moved into this house. Again no reason was submitted and proven in court why the power was going on and off.

As Far as PPL cutting trees or rigging against animals PPL Lied in court about this since, they never did it until, I filed complaints. I use to call PPL only to get ridiculed about it and told they had no proof it was happening nor any record it happened. Funny thing is they knew about my power going on and off and that was proven in court. Yet they never came out to figure out the problem until I filed a complaint. As far as animal rigging I was told by a Witness for PPL in court that they did very transformer around my house. I tried to prove that this was not done and only one transformer was rigged against Squirrels. No other one in my neighborhood was so rigged. As far as anyone coming out to check anything. Again I have cameras up around the outside of my house and have not caught anyone check anything in my back yard where the electrical wires are. I had to file a complaint to get the meter in my house changed. And still my electric bill has been going down ever since they did that. So the question on my meter is that it was not accurate for most of the time I have lived here. And the new one is putting out so much radiation (600 to 800 rems per minute) I will have to warn my neighbors to shield against it.

Judge Watson has ignored all the evidence regarding this issue. It make me wander if he can be impartial or not. He admits Hearsay without collaborating evidence, which is being summited to the court. He take witnesses words as evidence, with no evidence summited to back them up. No paper work or work forms that could prove it. No reports were summited to back up what they said. PPL keeps records of everything. I know this because they keep trying to summit evidence to my hearing that has nothing to do with my complaints as filed. My power has been going out since 1999 albite 1 or 2 minutes at a time but still to many times not to cause a problems at my house. The power going out, in society today cause massive problems with technology that is available to anyone today. Almost everything that is made today electronically has to be plugged in at some time to charge or run it. So when the power goes out everything plugged in need to reboot. And that take time. Batteries that have to be charged have to be restarted on the charging since the power went out. This cause serious problems when you are trying to live a life like mine. Stuck at home disabled and having my power go off and on all the time.

I will say even though PPL cannot tell me why the power is going on and off. They seem to have it temporally fixed, I have not had a problem since January of this year with my power going out. But give it time it will start happening again some time I the future. That is certain. PPL does not do Maintenance on anything but they wait till it goes out, for them to do anything.

So in closing Judge Watson Has ignored all evidence summited to the court in these complaints and did not consider all the evidence when he denied my complaints out of Hand.

And if this service conforms to pa Law I have no idea what law the Judge is reading certainly not the ones I have summited with my complaints since PPL's Service has not been even decent for a pa utility. I have been paying for excellent service and getting substandard service. That is why I have been asking for bill pay back and other relief in my complaints. I certainly have not receive good service with all time the power has gone off over the years.


Ross E. Schell

Addition to exceptions

1. I was lied to in the hearing and tried to prove it.
2. As far as single outages in my complaints. Most have noted that the power has been going on and off for at least 500 times over the last 17 years. PPL has summited this evidence to the hearings which were ignored by the judge.
7. It was never proven that a transformer went out in court. I have never been given a reason that my power went out.
- 10 PPL has not cut any trees in my neighborhood since I moved in in 1999. We have had the Local fire company cut trees due to sparking but my power never went out because of Trees touching the line and again this is jut and excuse on PPLs part since they cannot come up with a real reason. Besides not of this was summited in court. Unless it was emailed to the judge before the hearing so that I would not

know about it and he would make a decision based on the evidence that was submitted unconstitutionally and illegally.

11. This animal problem has never been proven in court. This is hearsay evidence and should not have been admitted. Unless it was emailed to the judge before the hearing so that I would not know about it and he would make a decision based on the evidence that was submitted unconstitutionally and illegally. I have found this in other hearings I have found.

12 Lie only one transformer in my neighborhood has been rigged with animal guards. I tried again to file on this only to have the secretary reject it or no one to act on it.

13 Again no proof submitted in court. Other than a witness who has never been verified by the court as to what his qualifications are. Unless it was emailed to the judge before the hearing so that I would not know about it and he would make a decision based on the evidence that was submitted unconstitutionally and illegally.

14-15-16 this was not down until I filed a complaint. At no time did my cameras catch anyone trimming trees in my back yard. One I caught on camera was when my lower neighbor called because there power was off. It turned out to be a bad connection in the power pole they say is not there responsibility since it is insulated.

This is also an answer to the answer I receives the 4th of March by Ms. Krupka PPLs attorney

CHAPTER 15
SERVICE AND FACILITIES

Subchapter

- A. General Provisions
- B. Discontinuance of Service to Leased Premises

Enactment. Chapter 15 was added July 1, 1978, P.L.598, No.116, effective in 60 days.

SUBCHAPTER A
GENERAL PROVISIONS

Sec.

- 1501. Character of service and facilities.
 - 1501.1. Certain utilities prohibited from using foreign coal.
- 1502. Discrimination in service.
- 1503. Discontinuance of service.
- 1504. Standards of service and facilities.
- 1505. Proper service and facilities established on complaint; authority to order conservation and load management programs.
- 1506. Copies of service contracts, etc., to be filed with commission.
 - 1507. Testing of appliances for measurement of service.
 - 1508. Reports of accidents.
 - 1509. Billing procedures.
- 1510. Ownership and maintenance of natural and artificial gas service lines.
 - 1511. Electricity supplied to certain organizations.

Subchapter Heading. The heading of Subchapter A was added November 26, 1978, P.L.1245, No.297, effective in 60 days.

1501. Character of service and facilities.

Every public utility shall furnish and maintain adequate, efficient, safe, and reasonable service and facilities, and shall make all such repairs, changes, alterations, substitutions, extensions, and improvements in or to such service and facilities as shall be necessary or proper for the accommodation, convenience, and safety of its patrons, employees, and the public. Such service also shall be reasonably continuous and without unreasonable interruptions or delay. Such service and facilities shall be in conformity with the regulations and orders of the commission. Subject to the provisions of this part and the regulations or orders of the

1504. Standards of service and facilities.

The commission may, after reasonable notice and hearing, upon its own motion or upon complaint:

(1) Prescribe as to service and facilities, including the crossing of facilities, just and reasonable standards, classifications, regulations and practices to be furnished, imposed, observed and followed by any or all public utilities.

(2) Prescribe adequate and reasonable standards for the measurement of quantity, quality, pressure, initial voltage or other condition pertaining to the supply of the service of any and all public utilities.

(3) Prescribe reasonable regulations for the examination and testing of such service, and for the measurement thereof.

(4) Prescribe or approve reasonable rules, regulations, specifications and standards to secure the accuracy of all meters and appliances for measurement.

(5) Provide for the examination and testing of any and all appliances used for the measurement of any service of any public utility.

1505. Proper service and facilities established on complaint; authority to order conservation and load management programs.

(a) **General rule.**--Whenever the commission, after reasonable notice and hearing, upon its own motion or upon complaint, finds that the service or facilities of any public utility are unreasonable, unsafe, inadequate, insufficient, or unreasonably discriminatory, or otherwise in violation of this part, the commission shall determine and prescribe, by regulation or order, the reasonable, safe, adequate, sufficient, service or

52202 - 9 Month Feeder History

Momentary w/ associated outage

Momentary w/o associated outage

Job Number	Trouble Year-Month	Trouble Date & Time	Restored Date & Time	Duration	Job Type
3249614-1	2016-03	3/4/2016 10:58:43 AM	3/4/2016 11:22:00 AM	24	NL
3249959-1	2016-03	3/5/2016 11:44:44 PM	3/5/2016 11:56:52 PM	0	NL
3249977-1	2016-03	3/6/2016 7:04:13 AM	3/6/2016 7:18:24 AM	0	NL
3250868-1	2016-03	3/9/2016 1:43:07 AM	3/9/2016 7:25:00 AM	342	NL
3254864-1	2016-03	3/22/2016 3:34:52 PM	3/22/2016 4:37:53 PM	0	NL
3256372-1	2016-03	3/28/2016 2:26:19 PM	3/28/2016 3:47:00 PM	81	NL
3258565-1	2016-03	3/30/2016 10:27:32 AM	3/30/2016 10:29:21 AM	0	NL
3259492-1	2016-04	4/1/2016 5:38:02 PM	4/1/2016 5:45:36 PM	0	NL
3267176-1	2016-04	4/11/2016 3:21:34 PM	4/11/2016 3:34:09 PM	0	NL
3270247-1	2016-04	4/21/2016 3:22:27 PM	4/21/2016 3:28:03 PM	0	NL
3276230-1	2016-05	5/10/2016 6:11:40 AM	5/10/2016 6:11:40 AM	0	NL
3276231-1	2016-05	5/10/2016 6:14:32 AM	5/10/2016 6:28:08 AM	0	NL
3276696-1	2016-05	5/11/2016 11:53:11 AM	5/11/2016 12:02:34 PM	0	NL
3278617-1	2016-05	5/17/2016 10:12:25 AM	5/17/2016 11:10:00 AM	58	NL
3279633-1	2016-05	5/19/2016 4:22:12 PM	5/19/2016 4:30:37 PM	0	NL
3279661-1	2016-05	5/19/2016 5:13:04 PM	5/19/2016 5:16:27 PM	0	NL
3280504-1	2016-05	5/22/2016 6:29:24 PM	5/22/2016 7:50:00 PM	81	NL
3282988-1	2016-05	5/30/2016 7:19:44 AM	5/30/2016 8:35:00 AM	0	NL
3283740-1	2016-05	5/31/2016 5:28:05 PM	5/31/2016 7:11:00 PM	103	NL
3283767-1	2016-05	5/31/2016 7:22:40 PM	5/31/2016 7:22:40 PM	0	NL
3283768-1	2016-05	5/31/2016 7:24:03 PM	5/31/2016 7:32:11 PM	0	NL
3283769-1	2016-05	5/31/2016 7:28:48 PM	5/31/2016 7:37:57 PM	0	NL
3283770-1	2016-05	5/31/2016 7:30:17 PM	5/31/2016 9:10:00 PM	100	NL
3287673-1	2016-06	6/9/2016 4:21:48 AM	6/9/2016 4:31:25 AM	0	NL
3288904-1	2016-06	6/11/2016 3:06:52 PM	6/11/2016 3:21:04 PM	0	NL
3291388-1	2016-06	6/16/2016 12:15:36 PM	6/16/2016 12:15:36 PM	0	NL
3291390-1	2016-06	6/16/2016 12:17:03 PM	6/16/2016 12:24:54 PM	0	NL

3291594-1	2016-06	6/16/2016 7:49:17 PM	6/16/2016 9:22:10 PM	0	NL
3295165-1	2016-06	6/27/2016 4:02:07 AM	6/27/2016 4:02:07 AM	0	NL
3295169-1	2016-06	6/27/2016 5:13:28 AM	6/27/2016 5:20:44 AM	0	NL
3297410-1	2016-06	6/30/2016 4:36:56 PM	6/30/2016 4:50:12 PM	0	NL
3298511-1	2016-07	7/4/2016 3:59:10 PM	7/4/2016 3:59:10 PM	0	NL
3298512-1	2016-07	7/4/2016 4:00:25 PM	7/4/2016 4:02:51 PM	0	NL
3298513-1	2016-07	7/4/2016 4:07:36 PM	7/4/2016 7:03:00 PM	176	NL
3309663-1	2016-07	7/25/2016 7:15:11 PM	7/25/2016 10:13:00 PM	178	NL
3315984-1	2016-08	8/5/2016 6:27:10 PM	8/5/2016 6:35:47 PM	0	NL
3316022-1	2016-08	8/5/2016 9:27:14 PM	8/5/2016 9:30:12 PM	0	NL
3316023-1	2016-08	8/5/2016 9:35:06 PM	8/5/2016 9:38:19 PM	0	NL
3316035-1	2016-08	8/5/2016 11:17:16 PM	8/6/2016 12:54:53 AM	0	NL
3322533-1	2016-08	8/16/2016 4:08:01 PM	8/16/2016 8:00:00 PM	232	NL
3324002-1	2016-08	8/18/2016 12:28:42 PM	8/18/2016 12:35:29 PM	0	NL
3329530-1	2016-09	9/1/2016 6:17:27 PM	9/1/2016 7:42:51 PM	0	NL
3329549-1	2016-09	9/1/2016 7:06:47 PM	9/1/2016 8:35:30 PM	0	NL
3329575-1	2016-09	9/1/2016 10:53:38 PM	9/1/2016 11:28:00 PM	35	NL
3329972-1	2016-09	9/2/2016 7:24:01 PM	9/2/2016 7:28:13 PM	0	NL
3330281-1	2016-09	9/4/2016 6:40:31 AM	9/4/2016 6:40:31 AM	0	NL
3330337-1	2016-09	9/4/2016 12:25:19 PM	9/4/2016 12:30:13 PM	0	NL
3330961-1	2016-09	9/6/2016 9:19:56 PM	9/6/2016 9:23:08 PM	0	NL
3331302-1	2016-09	9/7/2016 4:04:40 PM	9/7/2016 4:04:40 PM	0	NL
3331305-1	2016-09	9/7/2016 4:06:26 PM	9/7/2016 4:12:39 PM	0	NL
3331309-1	2016-09	9/7/2016 4:12:18 PM	9/7/2016 4:25:57 PM	0	NL
3333711-1	2016-09	9/13/2016 2:56:21 PM	9/13/2016 3:15:19 PM	0	NL
3337501-1	2016-09	9/23/2016 7:11:56 AM	9/23/2016 7:11:56 AM	0	NL
3337503-1	2016-09	9/23/2016 7:14:07 AM	9/23/2016 7:19:34 AM	0	NL
3337707-1	2016-09	9/23/2016 2:21:46 PM	9/23/2016 2:30:06 PM	0	NL
3338613-1	2016-09	9/26/2016 7:00:51 PM	9/26/2016 7:10:42 PM	0	NL
3339944-1	2016-09	9/29/2016 12:18:15 PM	9/29/2016 1:34:00 PM	76	NL
3345443-1	2016-10	10/13/2016 8:48:12 AM	10/13/2016 10:45:00 AM	117	NL

3348125-1	2016-10	10/21/2016 12:25:53 PM	10/21/2016 12:46:45 PM	0	NL
3352096-1	2016-10	10/29/2016 9:05:33 AM	10/29/2016 9:05:33 AM	0	NL
3352107-1	2016-10	10/29/2016 9:19:37 AM	11/2/2016 8:40:00 AM	0	NL
3357827-1	2016-11	11/14/2016 1:29:37 PM	11/14/2016 1:39:10 PM	0	NL
3359273-1	2016-11	11/18/2016 12:26:08 PM	11/18/2016 12:29:26 PM	0	NL
3359631-1	2016-11	11/19/2016 2:59:06 PM	11/19/2016 2:59:06 PM	0	NL
3359632-1	2016-11	11/19/2016 2:59:13 PM	11/19/2016 2:59:13 PM	0	NL
3359635-1	2016-11	11/19/2016 3:02:36 PM	11/19/2016 11:30:00 PM	508	NL
3360102-1	2016-11	11/19/2016 11:26:33 PM	11/19/2016 11:42:20 PM	0	NL
3361113-1	2016-11	11/20/2016 3:25:54 PM	11/20/2016 4:13:00 PM	48	NL
3364460-1	2016-11	11/22/2016 9:05:59 AM	11/22/2016 11:00:00 AM	115	NL
3364560-1	2016-11	11/22/2016 11:13:02 AM	11/22/2016 11:40:00 AM	27	NL
3366870-1	2016-11	11/29/2016 5:26:44 AM	11/29/2016 6:57:00 AM	91	NL
3369849-1	2016-12	12/6/2016 8:09:55 AM	12/6/2016 10:10:00 AM	121	NL
3422022-1	2016-12	12/13/2016 8:53:16 AM	12/13/2016 11:00:00 AM	127	NL
3422045-1	2016-12	12/13/2016 8:53:55 AM	12/13/2016 11:00:00 AM	127	NL
3427201-1	2016-12	12/13/2016 11:15:54 AM	12/13/2016 1:10:00 PM	115	NL
3454659-1	2016-12	12/13/2016 11:53:56 PM	12/14/2016 12:35:17 AM	0	NL
3525951-1	2016-12	12/15/2016 8:59:45 AM	12/15/2016 10:15:00 AM	76	NL
3525961-1	2016-12	12/15/2016 9:00:02 AM	12/15/2016 11:30:00 AM	150	NL

Device Type	Component	Cause	Grid Number
Fuse	OH-Primary/Neutral	Scheduled Outage	26764S35074
Transformer	No Component Entered	Non PPL Problem-Cust Fac	26952S35110
Transformer	No Component Entered	Non PPL Problem-Cust Fac	26952S35110
Transformer	OH-Pole/Arms Attachments	Equipment Failures	27093S35499
Transformer	No Component Entered	Non PPL Problem-Cust Fac	26175S34862
Transformer	OH-Transformer Fuse/Cutout	Equipment Failures	26173S34898
Transformer	No Component Entered	Non PPL Problem-Other	26900S35207
Transformer	No Component Entered	Non PPL Problem-Cust Fac	26895S35184
Transformer	No Component Entered	Non PPL Problem-Cust Fac	26126S34992
Transformer	No Component Entered	Non PPL Problem-Cust Fac	26969S35420
OCR	No Component Entered	Unknown	26981S35144
Transformer	No Component Entered	Non PPL Problem-Cust Fac	26662S35258
Transformer	No Component Entered	Non PPL Problem-Other	26240S35077
Transformer	OH-Primary/Neutral	Animals	26531S35160
Transformer	No Component Entered	Non PPL Problem-Other	26928S35414
Transformer	No Component Entered	Non PPL Problem-Other	26928S35414
Transformer	OH-Other Equipment(explain)	Equipment Failures	26995S35330
Transformer	OH-Transformer Fuse/Cutout	Animals	26995S35330
Transformer	OH-Transformer Fuse/Cutout	Equipment Failures	26916S35217
OCR	No Component Entered	Unknown	26981S35144
Transformer	No Component Entered	Non PPL Problem-Other	26889S35038
Transformer	No Component Entered	Non PPL Problem-Other	26662S35258
Transformer	OH-Transformer	Equipment Failures	26916S35217
Transformer	No Component Entered	Non PPL Problem-Other	26759S35117
Transformer	No Component Entered	Non PPL Problem-Cust Fac	26153S34855
OCR	No Component Entered	Unknown	26981S35144
Transformer	No Component Entered	Non PPL Problem-Cust Fac	26662S35258

Transformer	No Component Entered	Non PPL Problem-Cust Fac	26175S34862
OCR	No Component Entered	Unknown	26981S35144
Transformer	No Component Entered	Non PPL Problem-Other	26662S35258
Fuse	No Component Entered	Non PPL Problem-Cust Fac	26136S34890
OCR	No Component Entered	Unknown	26981S35144
Transformer	No Component Entered	Non PPL Problem-Other	26662S35258
Transformer	OH-Transformer Fuse/Cutout	Trees-Not Trimming Related	26812S35117
Transformer	OH-Primary/Neutral	Equipment Failures	26469S35232
Transformer	No Component Entered	Non PPL Problem-Other	26142S34854
Transformer	No Component Entered	Non PPL Problem-Other	26142S34854
Transformer	No Component Entered	Non PPL Problem-Other	26142S34854
Transformer	No Component Entered	Non PPL Problem-Cust Fac	26142S34854
Transformer	OH-Transformer Fuse/Cutout	Equipment Failures	26494S35211
Transformer	No Component Entered	Non PPL Problem-Cust Fac	26253S35055
Transformer	No Component Entered	Non PPL Problem-Other	26812S35117
Transformer	No Component Entered	Non PPL Problem-Other	26126S34992
Transformer	OH-Transformer	Scheduled Outage	26126S34992
Transformer	No Component Entered	Non PPL Problem-Other	26072S35004
OCR	No Component Entered	Unknown	26981S35144
Transformer	No Component Entered	Non PPL Problem-Other	26662S35258
Transformer	No Component Entered	Non PPL Problem-Other	26144S34964
OCR	No Component Entered	Unknown	26981S35144
Transformer	No Component Entered	Non PPL Problem-Other	26662S35258
Transformer	No Component Entered	Non PPL Problem-Other	26767S35199
Transformer	No Component Entered	Non PPL Problem-Other	26095S34952
Breaker/ OCR	No Component Entered	Unknown	26800S35620
Transformer	No Component Entered	Non PPL Problem-Other	26662S35258
Transformer	No Component Entered	Non PPL Problem-Cust Fac	26373S35117
Transformer	No Component Entered	Non PPL Problem-Cust Fac	26505S35148
Transformer	OH-Secondaries/Services	Trees-Trimming Related	26302S35106
Transformer	OH-Transformer Fuse/Cutout	Animals	26812S35117

Transformer	No Component Entered	Non PPL Problem-Cust Fac	26240S35077
OCR	No Component Entered	Unknown	26981S35144
Transformer	OH-Transmission	Non PPL Problem-Cust Fac	26662S35258
Transformer	No Component Entered	Non PPL Problem-Other	26167S35038
Transformer	No Component Entered	Non PPL Problem-Other	26601S34996
OCR	No Component Entered	Unknown	26981S35144
OCR	No Component Entered	Unknown	26981S35144
Fuse	OH-Primary/Neutral	Trees-Not Trimming Related	26470S35138
Not Found	No Component Entered	Non PPL Problem-Other	26512S35160
Transformer	OH-Secondaries/Services	Trees-Not Trimming Related	26923S35193
Transformer	OH-Transformer Fuse/Cutout	Trees-Trimming Related	26895S35184
Transformer	OH-Secondaries/Services	Scheduled Outage	26576S35153
Customer	No Component Entered	Non PPL Problem-Other	5009 MAURET
Transformer	OH-Transformer	Scheduled Outage	26173S34898
Transformer	OH-Transformer Fuse/Cutout	Scheduled Outage	26551S35267
Transformer	OH-Transformer Fuse/Cutout	Scheduled Outage	26533S35247
Transformer	OH-Transformer Fuse/Cutout	Scheduled Outage	26490S35171
Transformer	No Component Entered	Non PPL Problem-Other	26130S34865
Transformer	OH-Transformer Fuse/Cutout	Scheduled Outage	26545S35152
Transformer	OH-Transformer Fuse/Cutout	Scheduled Outage	26522S35127

# Customers (Momentary)	# Customers (Permanent)	CMI (Permanent)
0	118	2,747
0	0	0
0	0	0
0	19	4,110
0	0	0
0	15	1,210
0	0	0
0	0	0
0	0	0
0	0	0
1,622	0	0
0	0	0
0	0	0
0	7	403
0	0	0
0	0	0
0	3	242
0	0	0
0	1	103
1,626	0	0
0	0	0
0	0	0
0	1	100
0	0	0
0	0	0
1,623	0	0
0	0	0

0	0	0
1,622	0	0
0	0	0
0	0	0
1,622	0	0
0	0	0
0	6	1,052
0	5	889
0	0	0
0	0	0
0	0	0
0	0	0
0	14	3,248
0	0	0
0	0	0
0	0	0
0	12	412
0	0	0
1,624	0	0
0	0	0
0	0	0
1,624	0	0
0	0	0
0	0	0
0	0	0
1,774	0	0
0	0	0
0	0	0
0	0	0
0	7	530
0	6	701

Line was tied to neighboring circuit - fault was

0	0	0
1,627	0	0
0	0	0
0	0	0
0	0	0
1,632	0	0
1,632	0	0
0	72	22,183
0	0	0
0	4	188
0	4	456
0	6	162
0	1	90
0	15	1,801
0	8	1,014
0	12	1,513
0	5	571
0	0	0
0	5	376
0	10	1,500

on another feeder.

Schell; 09010-71010

Wednesday, Nov 25, 2015
2:19 PM

OMS Outage History

Trouble Date & Time	Restored Date & Time	Job Number	Duration	Order Description	Cause	Weather Type	Comments
6/24/2007 7:00:00 AM	6/24/2007 7:00:00 AM	130870-1	0	NL Order	Unknown	Unknown	
8/2/2007 10:27:21 PM	8/3/2007 1:40:05 AM	148048-1	160	NL Order	Equipment Failures	Not a Factor	Received from SCADA: 22:27 08/02/2007 UG 3 phase cable failed SC-27715s35327 to SC-27502s35278. Problems with Bakelight insulators between switches of GOLB-9526 at SC-27502s35278 caused approx. a 45 minute delay to restoring last 1339 customers. SC needs permanent repairs.
9/6/2007 8:54:21 AM	9/6/2007 8:54:21 AM	162232-1	0	NL Order	Unknown	Unknown	
11/2/2007 10:02:00 AM	11/2/2007 10:02:00 AM	180420-1	0	NL Order	Unknown	Unknown	
12/16/2007 5:06:00 AM	12/16/2007 5:06:00 AM	205962-1	0	NL Order	Unknown	Unknown	
12/16/2007 5:24:48 AM	12/19/2007 12:00:19 PM	208534-1	4716	NL Order	Trees-Not Trimming Related	Ice/Sleet/Snow	A & C phase S side loops opened at pole 26404s35107 for downed conductors pole 26404s35080 to pole 26403s35060. switch order H-462 WR 35449. Back in service at this time.
12/17/2007 12:45:00 PM	12/17/2007 12:45:00 PM	207559-1	0	NL Order	Unknown	Unknown	
4/30/2008 8:13:20 AM	4/30/2008 10:00:00 AM	253789-1	107	NL Order	Scheduled Outage	Not a Factor	tree trimming crew removed trees
6/16/2008 11:25:00 PM	6/16/2008 11:25:00 PM	277099-1	0	NL Order	Unknown	Unknown	
11/6/2008 8:34:00 AM	11/6/2008 8:34:00 AM	335897-1	0	NL Order	Unknown	Unknown	
5/5/2009 8:48:00 PM	5/5/2009 8:48:00 PM	387901-1	0	NL Order	Unknown	Unknown	
7/14/2009 8:12:00 AM	7/14/2009 8:12:00 AM	411445-1	0	NL Order	Unknown	Unknown	
4/28/2010 7:38:00 AM	4/28/2010 7:38:00 AM	507820-1	0	NL Order	Unknown	Unknown	
5/16/2010 6:19:00 AM	5/16/2010 6:19:00 AM	516918-1	0	NL Order	Unknown	Unknown	
5/29/2010 8:23:00 AM	5/29/2010 8:23:00 AM	521110-1	0	NL Order	Unknown	Unknown	
7/12/2010 4:47:00 PM	7/12/2010 4:47:00 PM	539134-1	0	NL Order	Unknown	Unknown	
7/18/2010 6:24:29 AM	7/18/2010 6:24:29 AM	542366-1	0	NL Order	Unknown	Unknown	
12/15/2010 6:07:00 PM	12/15/2010 6:07:00 PM	604022-1	0	NL Order	Unknown	Unknown	
2/21/2011 8:45:00 AM	2/21/2011 8:45:00 AM	627748-1	0	NL Order	Unknown	Unknown	
5/19/2011 3:45:00 AM	5/19/2011 3:45:00 AM	658805-1	0	NL Order	Unknown	Unknown	
7/29/2011 4:20:00 PM	7/29/2011 4:20:00 PM	699605-1	0	NL Order	Unknown	Unknown	
8/28/2011 6:28:00 AM	8/28/2011 1:15:55 PM	714514-1	407	NL Order	Trees-Not Trimming Related	Wind	::MDT ::SO audit complete per W1814**DMH
9/14/2011 7:49:00 PM	9/14/2011 7:49:00 PM	747643-1	0	NL Order	Unknown	Unknown	
9/14/2011 7:52:46 PM	9/15/2011 12:05:47 AM	747377-1	253	NL Order	Trees-Not Trimming Related	Rain	::MDT ::Tree Removed from conductors and conductors repaired (sleeved) at pole 26986s35029**SO audit complete per W0347**DMH
9/14/2011 9:21:00 PM	9/14/2011 9:21:00 PM	747655-1	0	NL Order	Unknown	Unknown	
9/15/2011 1:47:00 AM	9/15/2011 1:47:00 AM	747708-1	0	NL Order	Unknown	Unknown	
9/15/2011 2:27:00 AM	9/15/2011 2:27:00 AM	747710-1	0	NL Order	Unknown	Unknown	
9/15/2011 3:03:00 AM	9/15/2011 3:03:00 AM	747717-1	0	NL Order	Unknown	Unknown	
10/29/2011 3:07:00 PM	10/29/2011 3:07:00 PM	791317-1	0	NL Order	Unknown	Unknown	
10/4/2012 8:57:00 AM	10/4/2012 8:57:00 AM	915136-1	0	NL Order	Unknown	Unknown	
8/9/2013 5:15:00 AM	8/9/2013 5:15:00 AM	1046036-1	0	NL Order	Unknown	Unknown	
12/1/2013 8:38:00 AM	12/1/2013 9:50:31 AM	1082969-1	72	NL Order	Nothing Found (Explain)	Not a Factor	callout for sub repairman per SO.. rich dorman will work derek shearer will work. CB failure, did not cycle according to reclosing schedule.
1/13/2014 10:10:00 AM	1/13/2014 10:10:00 AM	1094600-1	0	NL Order	Unknown	Unknown	
2/3/2014 12:13:00 PM	2/3/2014 12:13:00 PM	1099084-1	0	NL Order	Unknown	Unknown	
5/21/2014	5/21/2014	1285650-0	0	NL Order	Unknown	Unknown	

PPL Exhibit 4

747377-1 9/15/2011 12:03:31 AM No Lights
 768299-1 10/29/2011 3:23:47 PM No Lights
 771509-1 10/29/2011 7:36:55 PM No Lights

0901071010
 0901071010
 0901071010

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

Effected Grid	Trouble Time	Restore Time	Job Number	Duration	Cause	Weather
26482S35254	7/1/1998 2:54:00 AM	7/1/1998 3:02:00 AM	58982101	8	Vehicles	Not a Factor
26482S35254	6/22/2001 4:52:00 PM	6/22/2001 5:57:00 PM	58122201	65	Trees - Not Trimming Related	Lightning
26482S35254	1/31/2002 9:46:00 PM	1/31/2002 9:56:00 PM	58219201	10	Other - Non-Controllable	Rain
26482S35254	1/31/2002 9:46:00 PM	1/31/2002 10:50:00 PM	58219202	64	Other - Non-Controllable	Rain
26482S35254	12/15/2003 7:33:00 PM	12/16/2003 12:23:00 AM	58630801	290	Equipment Failure	Not a Factor
26482S35254	8/4/2004 4:42:00 AM	8/4/2004 5:04:00 AM	58728401	22	Nothing Found	Lightning
26482S35254	5/2/2006 3:06:00 PM	5/2/2006 4:22:00 PM	58382001	76	Animals	Not a Factor
26482S35254	2/1/2007 10:20:00 AM	2/1/2007 11:51:00 AM	58625901	91	Forced Prearranged	Not a Factor

9:39:29 AM	9:39:29 AM	1					
5/21/2014 9:41:06 AM	5/21/2014 10:37:00 AM	1285646- 56	NL Order	Equipment Failures	Rain	Per Andy Pattison, failed fiber glass bracket at pole 26964s35049, will lift in the clear. H-0730	
6/5/2014 4:33:25 PM	6/5/2014 4:33:25 PM	1316439- 0	NL Order	Unknown	Unknown		
7/11/2014 6:34:37 AM	7/11/2014 8:30:00 AM	1337880- 116	NL Order	Equipment Failures	Not a Factor	::MDT No Required Permit per e60096 ::@1900-FM OFarrell sd I.Moyer taking call.Tman Welsko in enola. H-1005	
7/19/2014 10:22:59 AM	7/19/2014 10:22:59 AM	1341360- 0	NL Order	Unknown	Unknown		
7/27/2014 6:23:21 PM	7/27/2014 6:23:21 PM	1344311- 0	NL Order	Unknown	Unknown		
10/29/2014 9:02:01 AM	10/29/2014 9:02:01 AM	1374407- 0	NL Order	Unknown	Unknown		
3/31/2015 12:00:16 PM	3/31/2015 12:00:16 PM	1418184- 0	NL Order	Unknown	Unknown		
5/7/2015 11:47:53 AM	5/7/2015 11:50:00 AM	1429278- 3	NL Order	Scheduled Outage	Not a Factor	balancing the load	
6/14/2015 5:35:40 PM	6/14/2015 5:35:40 PM	1764832- 0	NL Order	Unknown	Unknown		
6/23/2015 4:17:45 PM	6/23/2015 4:17:45 PM	1915433- 0	NL Order	Unknown	Unknown		
6/29/2015 11:40:18 AM	6/29/2015 11:40:18 AM	2065179- 0	NL Order	Unknown	Unknown		
8/12/2015 1:07:00 PM	8/12/2015 1:09:00 PM	2134873- 2	NL Order	Equipment Failures	Not a Factor	while performing switching for ABB relay upgrade jobs at Devonshire sub, the 22-2 CB was carrying the 22-4 12kV line, and then the 22-2 CB unexpectedly operated.	
9/1/2015 7:22:50 AM	9/1/2015 7:22:50 AM	2142440- 0	NL Order	Unknown	Unknown		
9/1/2015 7:22:56 AM	9/1/2015 7:22:56 AM	2142441- 0	NL Order	Unknown	Unknown		
9/22/2015 6:05:49 PM	9/22/2015 6:05:49 PM	2150585- 0	NL Order	Unknown	Unknown		
9/22/2015 6:05:50 PM	9/22/2015 6:05:50 PM	2150586- 0	NL Order	Unknown	Unknown		
9/25/2015 10:48:35 PM	9/25/2015 10:48:35 PM	2151771- 0	NL Order	Unknown	Unknown		
2/7/2016 8:17:33 AM	2/7/2016 8:17:33 AM	3177278- 0	NL Order	Unknown	Unknown		
5/10/2016 6:11:40 AM	5/10/2016 6:11:40 AM	3276230- 0	NL Order	Unknown	Unknown		
5/31/2016 7:22:40 PM	5/31/2016 7:22:40 PM	3283767- 0	NL Order	Unknown	Unknown		
6/16/2016 12:15:36 PM	6/16/2016 12:15:36 PM	3291388- 0	NL Order	Unknown	Unknown		
6/27/2016 4:02:07 AM	6/27/2016 4:02:07 AM	3295165- 0	NL Order	Unknown	Unknown		
7/4/2016 3:59:10 PM	7/4/2016 3:59:10 PM	3298511-1 0	NL Order	Unknown	Unknown		
9/4/2016 6:40:31 AM	9/4/2016 6:40:31 AM	3330281-1 0	NL Order	Unknown	Unknown		
9/7/2016 4:04:40 PM	9/7/2016 4:04:40 PM	3331302-1 0	NL Order	Unknown	Unknown		
9/23/2016 7:11:53 AM	9/23/2016 7:11:53 AM	3337500-1 0	NL Order	Unknown	Unknown		
9/23/2016 7:11:56 AM	9/23/2016 7:11:56 AM	3337501-1 0	NL Order	Unknown	Unknown		

Trouble Calls

1082969-1	12/1/2013 8:40:25 AM	No Lights				0901071010
1082969-1	12/1/2013 8:55:04 AM	No Lights				0901071010
1087969-1	12/1/2013 9:30:35 AM	Outbound ERT Call				0901071010
1285646-1	5/21/2014 9:44:24 AM	No Lights		reptng no power @ residence		0901071010
1285646-1	5/21/2014 10:28:33 AM	Outbound ERT Call				0901071010
1337880-1	7/11/2014 6:49:15 AM	No Lights				0901071010
148048-1	8/2/2007 10:30:55 PM	No Lights				0901071010
148048-1	8/2/2007 10:46:28 PM	No Lights				0901071010
202533-1	12/16/2007 3:41:41 PM	No Lights/Wire Down		WIRES DOWN ACROSS RD @ THIS ADDRESS		0901071010
714514-1	8/28/2011 8:02:13 AM	No Lights				0901071010
799358-1	9/6/2011 5:53:21 PM	No Lights				0901071010
747377-1	9/14/2011 7:53:29 PM	No Lights				0901071010
747377-1	9/14/2011 8:00:56 PM	No Lights				0901071010
747377-1	9/14/2011 10:18:06 PM	No Lights				0901071010



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March 2, 2017

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
P.O. Box 3265
Harrisburg, PA 17105-3265

RE: Ross E. Schell v PPL Electric Utilities Corporation
Docket No: C-2016-2565671; C-2016-2565235; C-2016-2565236

Dear Ms. Chiavetta:

Enclosed for eFiling in the above-captioned matter are the Replies to Claimant's Exceptions on behalf of PPL Electric Utilities Corporation, to Complainant's Exceptions.

Please note that this filing was eFiled with the Commission on the date indicated above.

Very truly yours,

KIMBERLY G. KRUPKA

KGK/ejm
Enclosure

cc: Administrative Law Judge Jeffrey A. Watson (w/enc.) *via email only*
Ross E. Schell (w/enc.)
Patricia L. Moore (w/enc.) *via email only*
Kimberly R. Hanson (w/enc.) *via email only*
Holly M. Groth (w/enc.) *via email only*
Shelbie Frederick Bayda (w/enc.) *via email only*

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

ROSS E. SCHELL,

COMPLAINANT,

VS.

PPL ELECTRIC UTILITIES CORPORATION,

RESPONDENT.

COMPLAINT DOCKET

NO. C-2016-2565671

C-2016-2565235

C-2016-2565236

**PPL ELECTRIC UTILITIES CORPORATION'S REPLIES
TO EXCEPTIONS OF COMPLAINANT, ROSS SCHELL**

AND NOW, comes the Respondent, PPL Electric Utilities Corporation ("PPL Electric") by and through its attorney of record, Gross McGinley, LLP, and files the within Replies to Exceptions, alleging in support thereof as follows:

1. On February 21, 2017, Administrative Law Judge Watson issued an initial decision which dismissed the three (3) consolidated Complaints of Complainant, Ross E. Schell. On February 22, 2017, Complainant filed "Petition for Exceptions for Judge Watson's Initial Decision Dates 3 February 2017." As the Initial Decision was issued on February 21, 2017, Respondent's Replies are filed prior to its deadline of March 23, 2017.

Complainant's "Petition for Exceptions" is a three (3) page letter that fails to cite to any specific Finding of Fact or Conclusion of Law. Moreover, each Exception of Complainant is unnumbered and fails to cite to relevant pages of the decision. Nonetheless, to the extent Complainant's Exceptions are accepted, Respondent, PPL Electric, files the following Replies.

Complainant's first Exception appears to be to ALJ Watson's finding that "Complainant failed to meet his burden of proving that Respondent violated the Public Utility Code, a Commission regulation or a Commission order. 66 Pa.C.S. § 332(a)." (COL No. 3, pg 9). Such Exception is not supported by the substantial evidence submitted in this case. In particular, ALJ Watson appropriately found that the basis of Complainant's first Complaint (C-2016-2565671) was for an interruption of electric service for approximately ten (10) seconds on September 7, 2016 at

approximately 4:04 p.m. (N.T. at pg. 8-10, 34). In addition, Complainant's second and third Complaints were based on the same outage, a ten (10) second outage on September 4, 2016 at approximately 6:43 a.m. (N.T. at 14-16, 22, 23). After conducting a full hearing on all issues, ALJ found that the September 7, 2016 outage was caused by the failure of a 25 KVA transformer. (N.T. at 34-36). Unfortunately, there is no manner for PPL Electric to test all of the transformers in the field in order to "predict" which transformer may fail in the future. (N.T. at 35-36). The momentary outage of September 7, 2016 was unpreventable and was quickly rectified, with power restored within ten (10) seconds. Further, the momentary outage of September 4, 2016, occurred during a tree trimming operation. (N.T. at 35-37). PPL Electric was in the process of trimming any branches or brush which could come into contact with the line to prevent future interruptions of service. Further, PPL Electric was installing "animal guards" on transformers to prevent small animals, such as squirrels, from chewing through wires which cause outages. (N.T. at 45-46). These efforts of PPL Electric appear to have ended the momentary outages.

It was Complainant's contention that Respondent, PPL Electric, violated the provisions of 66 Pa. C. S. § 1501 by failing to provide adequate and reasonable electrical service. However, as ALJ Watson correctly found, adequate, efficient, safe and reasonable service does not require perfect service. Biason v. Metropolitan Edison Co., PUC Docket No. C-00004450 (December 19, 2001). Rather, the service provided need only be reasonably continuous and without unreasonable interruptions or delay. Complainant Shell cannot meet this burden, or showing inadequate, inefficient, unsafe or unreasonable service due to limited momentary outages. Moreover, as found by ALJ Watson, PPL Electric has been engaged in active tree trimming and installation of animal guarding to best protect against environmental events which could lead to outages. (Findings of Fact 15-16, N.T. 47-48). Accordingly, ALJ Watson correctly found that Complainant Schell failed to meet his burden of proving that Respondent, PPL Electric, violated the Public Utility Code, a Commission regulation or a Commission order. (Conclusion of Law 3).

For the foregoing reasons, PPL Electric requests that Complainant's Exceptions be dismissed.

GROSS MCGINLEY, LLP



BY: _____

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Date: March 2, 2017

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

ROSS E. SCHELL,

COMPLAINANT,

VS.

PPL ELECTRIC UTILITIES CORPORATION,

RESPONDENT.

COMPLAINT DOCKET

NO. C-2016-2565671

C-2016-2565235

C-2016-2565236

CERTIFICATE OF SERVICE

This is to certify that the Reply to Claimant's Exceptions on behalf of PPL ELECTRIC UTILITIES CORPORATION was mailed to counsel/complainant of record on behalf of Respondents by first class United States mail, postage on this the 2nd day of March, 2017.

Administrative Law Judge Jeffrey A. Watson
PA Public Utility Commission
P.O. Box 3265
Harrisburg, PA 17105
VIA EMAIL ONLY

Ross E. Schell
203 Knollwood Drive
Harrisburg, PA 17109

GROSS MCGINLEY, LLP



BY: _____

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**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Ross E. Schell	:	C-2016-2565671
	:	C-2016-2565235
v.	:	C-2016-2565236
	:	
PPL Electric Utilities Corporation	:	

INITIAL DECISION

Before
Jeffrey A. Watson
Administrative Law Judge

INTRODUCTION

Ross E. Schell (Complainant or Mr. Schell) filed three formal complaints against PPL Electric Utilities Corporation (PPL, Company or Respondent) alleging reliability, safety or quality problems with his electric service and that he was not notified that his power was going to be interrupted. This decision denies the formal complaints for failure of Complainant to meet his burden of proof.

HISTORY OF THE PROCEEDING

On September 8, 2016, Complainant filed a formal complaint (first complaint) at Docket No. C-2016-2565671. The first complaint alleges reliability, safety or quality problems with his electric service. As relief, Complainant requests a penalty paid to him in the sum of \$150,000 and to restart his billing two months after the complaint is settled or completed. Complainant filed another formal complaint (second complaint) on September 6, 2016 at Docket No. C-2016-2565235. The second complaint alleges reliability, safety or quality problems. As

relief, Complainant requests a penalty paid to him in the sum of \$150,000 and forgiveness by Respondent of his current bill.¹

Complainant filed another formal complaint (third complaint) on September 6, 2016 at Docket No. C-2016-2565236. The third complaint alleges reliability, safety or quality problems. As relief, Complainant requests forgiveness by Respondent of his outstanding balance.

Respondent filed its answer to the first complaint on September 26, 2016, an answer to the second complaint on September 26, 2016, and to the third complaint on September 26, 2016. In each answer, Respondent essentially admitted that it provides electric service to Complainant. Respondent denied the material averments set forth in the complaints.

On September 29, 2016, Complainant filed an “answer to answer” to the answers filed by Respondent to the second and third complaints. Complainant filed an “answer to answer” on October 4, 2016 to the answer filed by Respondent to the first complaint. In these pleadings, Complainant essentially reiterated the averments set forth in the complaints and cited various provisions of the Pennsylvania Code.

On October 14, 2016, a hearing notice was issued which scheduled the initial telephonic hearing on all three complaints for November 16, 2016, at 10:00 a.m. On October 25, 2016, the undersigned presiding officer issued a prehearing order, which set forth the procedural requirements for formal hearings before the Commission.

On November 16, 2016, the undersigned presiding officer convened the initial telephonic hearing as scheduled. At the start of the hearing, the parties agreed to consolidate the three proceedings. Complainant appeared *pro se* and testified on his own behalf. He offered no

¹ Essentially, Complainant is seeking an award of monetary damages. However, the Commission lacks authority to award monetary damages. See *In Re: Melograne*, 812 A. 2d 1164 (Pa. 2002); *Feingold v. Bell of Pennsylvania*, 477 Pa. 1, 383 A.2d 791 (1977). *DeFrancesco v. Western Pennsylvania Water Company*, 453 A.2d 595 (Pa. 1982); *Elkin v. Bell of Pa.*, 420 A.2d 371 (Pa. 1980). Therefore, this issue is not addressed further in this decision.

exhibits. Respondent was represented by Kimberly G. Krupka, Esquire, who presented testimony from one witness and offered no exhibits.

A transcript of the hearing was generated, consisting of 56 pages. The record closed upon receipt of the transcript on December 16, 2016.

For the reasons set forth below, the formal complaints will be denied.

FINDINGS OF FACT

1. The Complainant in this case is Ross E. Schell who resides at 203 Knollwood Drive in Harrisburg, Pennsylvania (service address or service location). (Tr. 9)
2. The Respondent in this case is PPL Electric Utilities Corporation.
3. Complainant filed three formal complaints, which were consolidated and which are the subject of this initial decision. (Tr. 4-5)
4. Complainant has not called Respondent to report any issues with reliability since 2013. (Tr. 24-25)
5. Complainant has not made a payment on his bill from Respondent for at least one year. (Tr. 26)
6. The basis for the filing of the first complaint was an interruption of electric service for approximately ten seconds on September 7, 2016 at approximately 4:04 p.m. (Tr. 8-10, 34)
7. The momentary interruption on September 7, 2016 was caused by the failure of a 25 KVA transformer. (Tr. 34-36)

8. There is no way for Respondent to test all of its transformers in the field in order to prevent a transformer from failing. (Tr. 35-36)
9. The basis for the filing of the second and third complaints was an interruption of electric service for approximately ten seconds on September 4, 2016 at approximately 6:43 a.m. (Tr. 14-16, 22, 34)
10. The momentary outage on September 4, 2016 occurred during a period of time when Respondent was performing tree trimming operations. (Tr. 35-37)
11. The momentary outage on September 4, 2016 was likely caused from a tree branch dropping on a line or an animal coming in contact with a line. (Tr. 36-37, 45)
12. Respondent places animal guards on all transformers in all new installations and places animal guards on existing transformers based upon Company inspections. (Tr. 37-38)
13. Animals can damage a guard by chewing the device over time. (Tr. 39)
14. Respondent also takes protective measures to protect its entire system from damage when an animal comes in contact with any part of the system. (Tr. 45-46)
15. Since the beginning of 2016, Respondent has installed animal guards and has implemented tree trimming measures on the feeder system servicing the service location. (Tr. 47-48)
16. The tree trimming operations have been completed in the area of the service location and Respondent plans to begin inspecting all of the distribution transformers on the feeder system servicing the service location and replacing any animal guards found to be damaged. (Tr. 47-48).

DISCUSSION

History

The first complaint was filed on September 8, 2016 at Docket No. C-2016-2565671, alleging reliability, safety or quality problem with Complainant's electric service. The basis for the filing of the first complaint was an alleged interruption of electric service on September 7, 2016, at approximately 4:04 p.m. The momentary interruption on September 7, 2016 consisted of an interruption of electric service to Complainant of a duration of no more than ten seconds.

Complainant testified that his power goes off and on and that he has called Respondent a couple of times to determine the cause of the outages. He stated that Respondent is now "hacking all the trees down"² but his electricity still goes off and on. Complainant testified that the outages occurred for a duration of "about a minute."³ Complainant testified that he did not call the Company regarding the outages and that the last time he contacted Respondent was in 2013.

Mr. Schell further complained that Respondent failed to provide him with advance notice of the interruption, but he provided no evidence that the interruption was a planned outage.

Respondent presented testimony of Michael Hadginske (Mr. Hadginske), a senior electrical engineer employed by Respondent as a reliability engineer. Mr. Hadginske credibly testified that Complainant incurred a momentary interruption of service with a duration of no more than ten seconds, on September 7, 2016, and a ten second interruption on September 4, 2016.

² Tr. 9.

³ Tr. 11.

The cause of the interruption on September 7, 2016 was the failure of a 25 kVa transformer. No evidence was presented establishing any specific outages affecting the service location after September 7, 2016.

The second complaint was filed on September 6, 2016 at Docket No. C-2016-2565235, and the third complaint was filed on September 6, 2016 at Docket No. C-2016-2565236. Both complaints allege reliability, safety or quality problems with his electric service.

The momentary outage on September 4, 2016 occurred when Respondent was performing tree trimming operations, and was likely caused from a tree branch dropping on a line or an animal coming in contact with a line. Respondent places animal guards on all transformers in all new installations and places animal guards on existing transformers based upon Company inspections.

Animals can damage a guard by chewing the device over time. Respondent also takes protective measures to protect its entire system from damage when an animal comes in contact with any part of the system.

Since the beginning of 2016, Respondent has installed animal guards and has implemented tree trimming measures on the feeder system servicing the service location. Since tree trimming operations have been completed in the area of the service location, Respondent plans to inspect all of the distribution transformers on the feeder system servicing the service location and replace any animal guards found to be damaged.

Section 1501 of the Public Utility Code (Code), 66 Pa.C.S. § 1501, requires all public utilities to furnish and maintain adequate, efficient, safe, and reasonable service and facilities, and to make all repairs, changes, improvements, etc., to its service and facilities as shall be necessary or proper for the accommodation, convenience and safety of its patrons, employees, and the public. As defined, in pertinent part, in Section 102 of the Code, 66 Pa.C.S. § 102:

“Service.” Used in its broadest and most inclusive sense, includes any and all acts done, rendered, or performed, and any and all things furnished or supplied, and any and all facilities used, furnished, or supplied by public utilities...in the performance of their duties under this part to their patrons, employees, other public utilities, and the public....

Complainant argues that Respondent violated the provisions of 66 Pa.C.S. § 1501 by failing to provide adequate and reasonable utility service. Absent proof by a preponderance of the evidence that Respondent violated the provisions of 66 Pa.C.S. § 1501, the Commission has no authority to require any action by Respondent. *West Penn Power Co. v. Pa. Pub. Util. Comm’n*, 478 A.2d 947 (Pa.Cmwlth. 1984).

In determining whether Respondent has violated the provisions of 66 Pa.C.S. § 1501, it must be understood that what is required is adequate, efficient, safe, and reasonable service and facilities, not “perfect service.” *Manuel A. Biason v. Metropolitan Edison Company*, PUC Docket No. C-00004450 (Opinion and Order entered December 19, 2001). Likewise, service must only be reasonably continuous and without unreasonable interruptions or delay. The Code does not mandate perfect service nor must a public utility provide the best possible service. Most certainly, a public utility is not a guarantor of either perfect service or the best possible service. *Re Metropolitan Edison Company*, 80 Pa. PUC 662 (November 19, 1993).

Mr. Schell experienced two momentary outages in a period of three days which lasted several seconds each. Upon becoming aware of the outages occurring in the area of Complainant’s residence, Respondent investigated the likely cause of the outages and implemented tree trimming procedures and further inspections to identify and replace line guards to prevent future interruptions.

Although the evidence presented by Respondent establishes that Complainant experienced two brief momentary outages, no evidence was presented establishing that the momentary outages could have been prevented by Respondent or that Respondent failed to adequately and timely address the outages. The evidence presented by Complainant is not

sufficient to support a finding that Respondent provided inadequate, inefficient, unsafe, or unreasonable service and facilities. Mr. Schell failed to establish a *prima facie* case.

Complainant presented no credible evidence or authority to establish, under the circumstances, that the number of outages experienced by Complainant or the customer service provided in addressing the outages constituted inadequate, inefficient, unsafe, or unreasonable service.

In *Elkin v. Bell Telephone Company*, 372 A.2d 1203 (Pa.Super. 1977), the Pennsylvania Superior Court defined “reasonable and adequate” service and explained:

“Every public utility shall furnish and maintain adequate, efficient, safe, and reasonable service and facilities, and shall make all such repairs, changes, alterations, substitutions, extensions, and improvements in or to such service and facilities as shall be necessary or proper for the accommodation, convenience, and safety of its patrons . . . and the public. Such service also shall be reasonably continuous and without unreasonable interruptions or delay. Such service and facilities shall be in conformity with the regulations and orders of the commission” *Id.* 372 A.2d at 1205-06.

As the Court further explained in *Elkin*, the duty is upon the Commission to determine, on the basis of the facts and circumstances indicated by the substantial evidence, whether the service provided was reasonable and adequate. Therefore, a case-by-case analysis must be made with regard to the length of time required by the Company to respond to the concerns raised by the customer.

Complainant also alleged that he was not notified that his power was going to be interrupted prior to the outages on September 4 or 7, 2016. As discussed above, the outages were not planned by Respondent and no advance notice of the outages could be provided by the Company.

Mr. Schell has not established that Respondent failed to provide him with adequate, safe, efficient and reasonable utility service in violation of 66 Pa.C.S. § 1501. Mr. Schell failed to establish a *prima facie* case. He has failed to meet his burden of proof. Accordingly, this claim will be denied.

CONCLUSIONS OF LAW

1. The Commission has jurisdiction over the parties and the subject matter of this proceeding. 66 Pa.C.S. § 701.
2. Complainant has the burden of proof. 66 Pa.C.S. § 332(a).
3. Complainant failed to meet his burden of proving that Respondent violated the Public Utility Code, a Commission regulation or a Commission order. 66 Pa.C.S. § 332(a).

ORDER

THEREFORE,

IT IS ORDERED:

1. That the Formal Complaints filed by Ross E. Schell against PPL Electric Utilities Corporation at Docket Nos. C-2016-2565671, C-2016-2565235, and C-2016-2565236 are denied.

