

**In the Court of Administrative Law
Pennsylvania Public Utility Commission**

**Jerome Sindaco
VS.
PPL Electric Utilities Corporation**

**Case #C-2017-2639465
Administrative Law Judge
Jeffrey A. Watson**

**MOTION FOR
ORDER TO CEASE & DESIST**

2018 october 29

PA PUC
SECRETARY'S BUREAU

2018 OCT 31 AM 10:34

RECEIVED

The following relevant facts are presented, regarding the building and electrical equipment & service at 14 South Main Street, in Pittston, Pennsylvania, the heart of the above captioned case:

1. Mr. Harry Smith, acting for The City of Pittston (CoP) did order the property to be completely disconnected from the electrical grid.
2. PPL Electric Utilities Corporation (PPL) did completely disconnect the building from all electrical service in response to Mr. Harry Smith.
3. PPL & CoP contend that all electrical wiring and equipment on the outside of the building is completely useless for its installed purpose and, as a result, completely unsuitable for electrical service.
4. As a result of facts 1,2,& 3, the building has absolutely no proper electrical service equipment or wiring and from the defendants' standpoint, all this existing equipment & wiring is nothing more than junk to be discarded before new equipment is installed.
5. CoP has successfully prosecuted a \$1000 citation, (MJ-11102-NT 424-2018,) for non-removal of this equipment & wiring.
6. The mention of this docketed action in your court proved to be not credible as a defense for not removing the electrical materials.
7. I maintain that the wiring and equipment is wholly sound and only in need of minor repair and the building should not have been disconnected without warning.

8. This matter, before you, was initiated to save the expense of totally replacing the electrical materials.
9. This electrical equipment & wiring, whatever its current condition, poses ABSOLUTELY ZERO safety or health hazard.
10. The removal of this electrical equipment & wiring will deprive me of the very property that I am seeking to preserve for future use.

In contemplation of these facts, I am asking for an order, on my behalf, to PPL & CoP, to cease and desist from all efforts, past, present, & future, to have the electrical materials removed prior to the completion of this case in your court.



Jerome Sindaco

Certificate of Service

2018 October 29

I hereby certify that I am this day serving these persons and in the manner indicated below.

Service by 1st class mail via US Postal Service as follows:

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(Attorney for PPL Electric Utilities Corporation)

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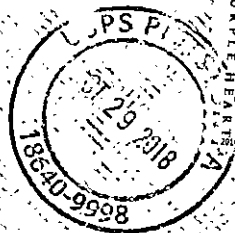
BY:



JEROME SINDACO

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Mike: C-2017-2639465