

Diana Sabatine
315 Possum Hollow Road
Latrobe, Pennsylvania [15650]
(724) 689-9771

November 29, 2018

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
P.O. Box 3265
Harrisburg, Pennsylvania 17105-3265
Accepts E-Service

**Re: Motion for Stay
Diana Sabatine v. West Penn Power Company
Docket No. C-2018-3002804**

Dear Secretary Chiavetta,

Please see the attached *Motion for Stay* for E-Filing in the above referenced docket number. Thank you.

Sincerely,



Diana Sabatine

Accepts E-Service: Judge Jeffrey Watson, Pennsylvania Public Utility Commission
Lauren Marissa Lepkoski, Esquire, First Energy Service Company
Rosemary Chiavetta, Secretary, Pennsylvania Public Utility Commission

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Diana Sabatine

v.

WEST PENN POWER COMPANY

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Docket No. C-2018-3002804

Motion for Stay

TO: Judge Jeffrey Watson

Based on lack of jurisdiction of the complaint against First Energy Corporation of Akron, Ohio, and First Energy Service Company, and West Penn Power Company, I request a 90 day stay of all proceedings while I pursue moving our civil complaint to an Article III Court of Record as described by the Constitution for these united states of America.

1. It is admitted by silence that this court does not have jurisdiction to issue decisions for complaints other than those limited to persons, in other words fictitious entities.

2. The complainant is not a person, but rather is a people, as used in the Declaration of Independence.

3. The instant formal complaint as filed is against a foreign corporation, FIRST ENERGY CORPORATION of Ohio, First Energy Service Company, a Pennsylvania public utility WEST PENN POWER COMPANY, and shall be against the COMMONWEALTH OF PENNSYLVANIA PUBLIC UTILITY COMMISSION (PUC).

4. It is admitted by silence that this administrative court does not have jurisdiction to order the PUC to change policy, procedures, rules, or rulings.

5. Act 129 of 2008 is being improperly interpreted by the PUC. The word “shall” in Act 129 means there is no escape from the plain language meaning. The plain language of the Act/Statute is “at the customer request.”

6. There is nothing in the Act/Statute or the history of the Act/Statute to think that “at the customer request” means anything but what it says and is only emphasized by the word “shall” that precedes it.


7. We have presented this Act/Statute to numerous people. Some of these people were in the legislature and voted to pass legislation. After reading it, the only ones who think that the plain language meaning is mandatory are a few of the electric company employees and some of the employees of the Commonwealth of Pennsylvania Public Utility Commission.

8. It is a Maxim of Law that an act/statute be interpreted according to the language of the people, not the language of lawyers or utility companies. How else can the people know what is required of them?

9. **It would be a waste of time for this court, for the respondents, and for the complainant to proceed knowing that critical issues cannot be addressed by this court and are being moved to a Court of Record.**

Therefore, We request this administrative court to stay all proceedings on this matter for 90 days, pending control of this matter moving to a Court of Record.

Dated: November 27, 2018


Diana Sabatine
315 Possum Hollow Road
Latrobe, Pennsylvania [15650]
(724) 689-9771

C-2018-3002804 – Diana Sabatine v. WEST PENN POWER COMPANY

FILE WITH:

ROSEMARY CHIAVETTA, SECRETARY
PENNSYLVANIA PUBLIC COMMISSION
COMMONWEALTH KEYSTONE BUILDING
P.O. BOX 3265
HARRISBURG, PENNSYLVANIA 17105-3265
Accepts E-Service

WITH A COPY TO:

LAUREN MARISSA LEPKOSKI ESQUIRE
FIRSTENERGY SERVICE COMPANY
2800 POTTSVILLE PIKE
PO BOX 16001
READING PA 19612
610.921.6203
Accepts E-Service

Diana Sabatine
315 Possum Hollow Road
Latrobe, Pennsylvania [15650]
724.689.9771
Accepts E-Service

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Diana Sabatine

v.

WEST PENN POWER COMPANY

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Docket No. C-2018-3002804

ORDER

IT IS ORDERED:

That Complainant's request for a 90 day stay is granted.

Date: _____

Jeffrey A. Watson
Administrative Law Judge