

Craig Reinheimer
405 Rices Mill Road
Wyncote, PA 19095

Docket No. C-2019-3006948
January 23, 2019

PA Public Utility Commission
Commonwealth Keystone Building, Second Floor
400 North Street
Harrisburg, PA 17120

RE: Craig Reinheimer v. PECO Energy Company
Docket No. C-2019-3006948

Dear Sir or Madam:

This response is regarding PECO's response to my claim in item number 4. PECO alleges "PECO spoke to the Complainant and informed him that the tree is the property owner's responsibility, and a private contractor can remove the tree. PECO advised the Complainant to hire a qualified private contractor to remove the tree of concern." PECO has produced no evidence to support their claim of what information exists or the accuracy of the conversation that took place between the Complainant and PECO on February 22, 2017. Despite a commitment by the PECO representative that the Complainant would receive a copy of the report, the said report has never been provided, and it was stated by Mr. Robert Nichols on April 13, 2018 in his email that he cannot turn over his investigation of the Complainant's claim without a subpoena.

The actions or inactions the Complainant took were directly resultant from the assessment and assurances of the PECO vegetation management representative who assessed the tree on February 22, 2017. As the Complainant has been repeatedly denied access to the full report, the accuracy of the report regarding the information provided by PECO to the Complainant can not be authenticated.

Furthermore, Subchapter N. Electric Reliability Standards, §57.198 (n)(2)(vi) states that part of the inspection should include a load calculation of the pole. The following paragraph, Subchapter N. Electric Reliability Standards, §57.198 (n)(3) states if a pole fails inspection and shows dangerous conditions, the pole shall be replaced within 30 days. As the Complainant has documented, a pole downline from the where the tree struck the line was severely compromised. It would go to reason that PECO was fully aware of the threat to the line given they had installed a cable as a safety measure to protect their line from the tree that fell. It would also stand to reason that since PECO inspected the tree on February 22, 2017 and was aware of the potential risk, all reasonable precautions should have been taken to ensure the safety measures PECO had installed were not compromised.

RECEIVED

JAN 26 2019

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

RECEIVED

JAN 26 2019

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

Docket No. C-2019-3006948

January 23, 2019

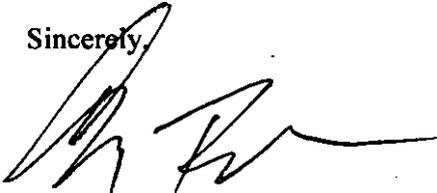
Page 2

Based on the assessment made by the PECO vegetation management expert whereas "dead trees have no wind resistance and therefore will not fall," the fact this same expert identified the safety cable installed by PECO to protect the line from the tree, and with the assurances from this expert the tree would not fall into the Complainant's yard and strike the home or property, the Complainant saw no reason to take any action to have the tree removed. Fundamentally, PECO provided the Complainant with information that they were not at risk; PECO was previously aware of the potential risk as evidenced by the safety cable installed by PECO to protect the lines; PECO did not maintain their poles and equipment as required by PA Code.

Furthermore, PECO is denying all of paragraph 5 of the formal complaint despite damages caused by PECO to repair their lines, admitted to by PECO and promised to repair by PECO.

Because of PECO's unwillingness to provide compensation or repairs in a timely manner and due to their direct negligence, the Complainant is requesting a formal hearing.

Sincerely,

A handwritten signature in black ink, appearing to read "Craig Reinheimer", with a long horizontal flourish extending to the right.

Craig Reinheimer

cc: file
Shawane Lee, Counsel for PECO Energy Company

CERTIFIED MAIL

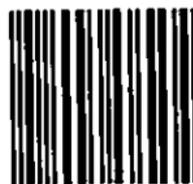
Craig Reinheimer
405 Rices Mill Road
Wyncote, PA 19095



7018 0360 0002 0332 8519



1000



17120

U.S. POSTAGE PAID
FCM LETTER
ELKINS PARK, PA
19027
JAN 26, 19
AMOUNT

\$3.95

R2304H108036-11

PA Public Utility Commission
Commonwealth Keystone Building, Second Floor
400 North Street
Harrisburg, PA 17120

1712033333 0000

