

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

LIPSOSS CORP CONSTRUCTORS

Complainant,

Vs

No. C-2019-3012350

DUQUESNE LIGHT COMPANY

Respondent

PETITION FOR ALLOWANCE OF ADDENDUM NO. 3 TO FORMAL COMPLAINT

Filed on behalf of Complainant Lipsoss
Corp and Anastasios Smalis pro-se

6652 Northumberland St

Pittsburgh PA 15217

412 303 5564

email: smalisanastasios18@gmail.com

PENNSYLVANIA PUBLIC UTILITY COMMISSION

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PETITION FOR ALLOWANCE OF ADDENDUM NO. 3 TO FORMAL COMPLAINT

AND NOW, comes complainant in filling this Petition for allowance of addendum no. 3 to the formal complaint.

1. In addendum no. 1 and no.2 complainant has made reference to 7 lots in the complainant "Exhibit 25" attached.
2. The 7 lots are described as 49-R-351,49-R-353, 49-R-355, 49-R-356, 49-R-357, 49-R-358 and 49-R-359.
3. As per letter dated September 8, 2010 as in attached "Exhibit 25" respondent continued to advance their contention that Duquesne Light was here first and refused to move electric poles and their high-tension wire from complainant's property.
4. Attached are complainant's "Exhibits 1-A through 10-A" in its entirety.
5. Respondent has refused to move their poles and wires has created a hazard in violation of 29-CFR-1926 Subpart L enacted November 9, 1996.
6. This hazard created by respondent has prevented complainant from removing the trees due to electrical lines and bare wire are inter-wined with the tree branches as in attached "Exhibits 5-A,6-A,9-A and 10-A.
7. Complainant unable to cut trees for development of 8 townhouses due to regulation 29-CFR 1926 Subpart L dictates that any worker working near electrical lines must be at least 10 feet away from any high-tension wires.

8. "Exhibits 1-A, 2-A, 3-A, 4-A, and 8-A exhibits the arrogance of complainant to dispose of old electrical poles on complainants property when they replaced the poles as indicated in the attached exhibits.

Respondent continued to violate the commissions regulation has created a hazard on complainant's property due to the trees are 90% dead and need to be removed with accordance to OSHA regulation which respondent has been prevented complainant from developing its property due to respondents failure to remove electric poles and high-tension wires in accordance to commissions regulation. Complainant has been notified worker being hit by dead branch due to respondent's failure to comply by letter of 2010 and violation of commission's regulation.

WHEREFORE complainant request from the PUC commission to admit this petition of allowance of addendum no.3 as part of formal complaint.

Dated: September 28, 2019

Respectfully Submitted

Lipsoos Corp Constructors
Anastasio Smalis

LIPSOOS CORP CONSTRUCTORS

ANASTASIOS SMALIS

6652 Northumberland St

Pittsburgh PA 15217

412 303 5564

Email:smalisanastasio18@gmail.com



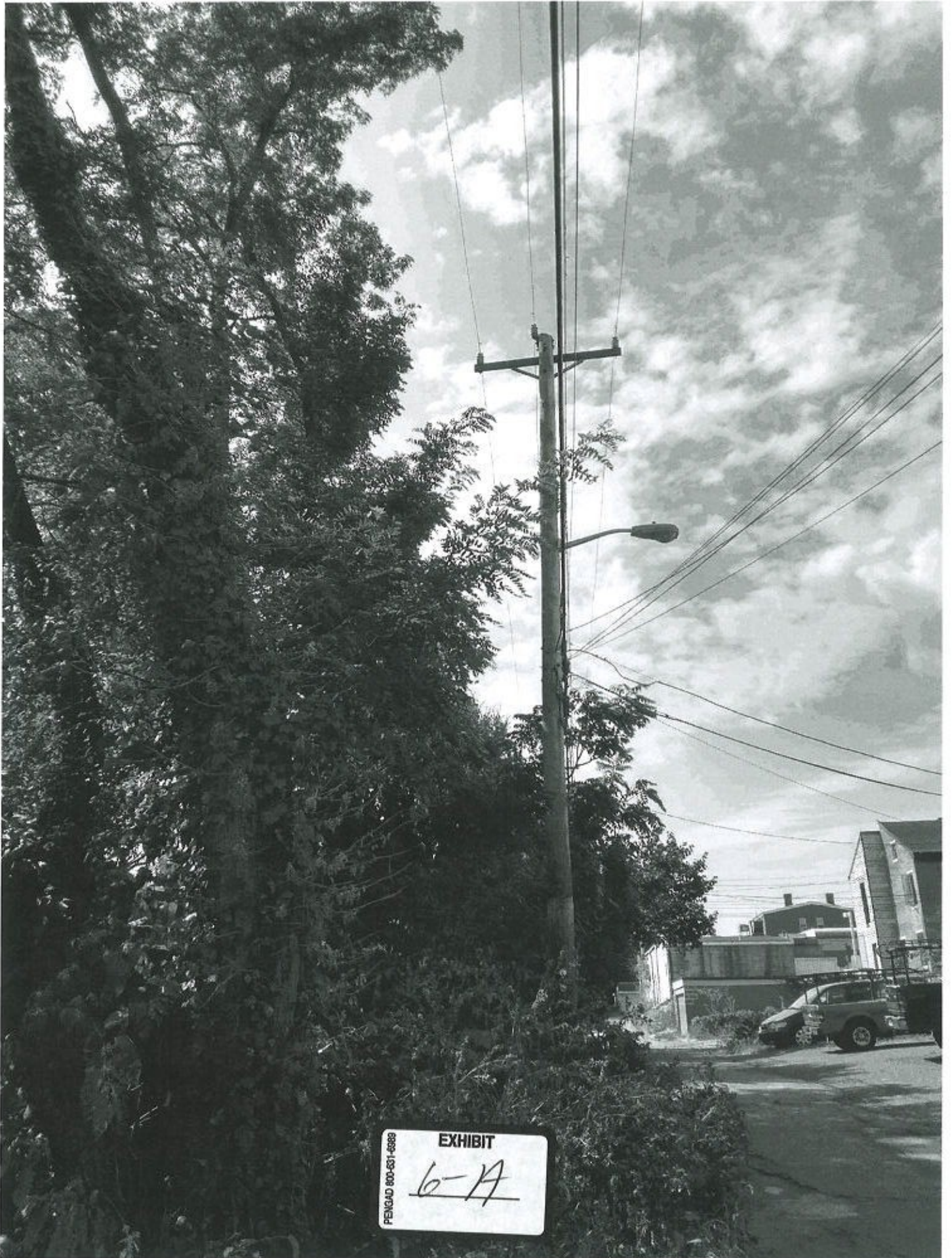


PENGAJID 800-631-6686
EXHIBIT
2-A









PENGAD 800-331-6889
EXHIBIT
6-A





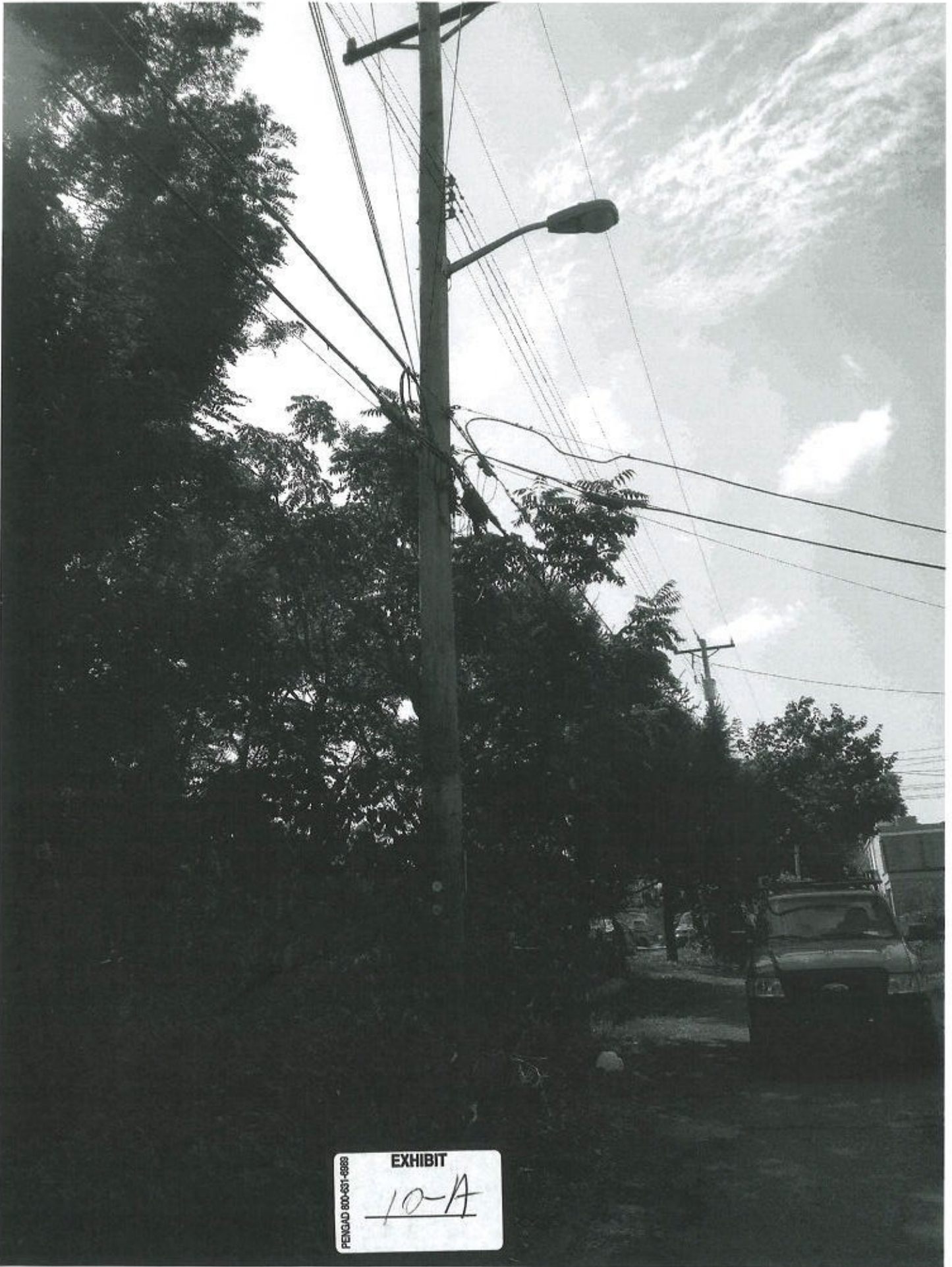


EXHIBIT
10-A
PENGAD 800-651-8888

September 8, 2010

Anastasios Ernest Smalis & Despina Smalis

18 Timberline Court

Pittsburgh, Pa 15217

Phone 412-422-2998 (work for Despina Smalis)
412-477-4263 Ernest

Duquesne Light Company-

411 Seventh Avenue - 16th floor

Pittsburgh, Pa 15219

Phone - 412-393-1541

Fax - 412-393-1418

Re- 4073 Liberty Avenue
7 Lots next to Ball field
on Ewing St.

To whom it may concern:

after numerous telephone calls to your Department Duquesne Light Company in reference to our Properties, on the Reference at Rear of 4073 Liberty Avenue are Electrical Lines Too close to the Rear of Building and I believe wires are over the Roof which prevents Roofers to Repair Roof and Bricks. workers refuse to put ladder behind Building. Property to left and right of Building are Private Property also on the 7 Lots next to Baseball field on Ewing St Duquesne Light Company has 2 ~~poles~~ Electrical Poles on our Property and the overhead lines are on our Land. City of Pittsburgh has instructed me that City of Pittsburgh has never you Duquesne Light Company fight away Permit and should speak to your office. I did and your office has instructed me the Right away was granted long before me. I don't think so. Please Respond. Thank you.

Anastasios Ernest Smalis

EXHIBIT
25

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VERIFICATION

I, Anastasiosn Smalis, 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).



Anastasios Smalis
Lipsoass Corp Constructors

Dated: 9/27/2019

PENNSYLVANIA PUBLIC UTILITY COMMISSION

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CERTIFICATE OF SERVICE

I Anastasios Smalis and Lipsoss Corp constructors certify that a true and correct copy of the foregoing documents was sent to the following individuals by first class mail

Emily M. Farah
Counsel for respondent
411 Seventh Avenue
Mail drop 15-7
Pittsburgh Pa 15219

Anastasios Smalis
Lipsoss Corp Constructors
9/28/2019