

Tom and Bobbie Altman  
c/o 876 Route 271  
Ligonier, Pennsylvania [15658]

***Via E-filing***

Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street, 2<sup>nd</sup> Floor  
Harrisburg, Pa. 17120

**Re: Tom and Bobbie Altman v. West Penn Power Company  
Docket No. C-2018-3006434**

Dear Secretary Chiavetta:

Enclosed please find the Response and Objection to West Penn Power Company's *Motion to Dismiss* with regard to the above-captioned matter. This motion has been served on the Respondent as shown in the Certificate of Service.

Respectfully submitted,

Dated: November 26, 2019



Tom Altman



Bobbie Altman

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**TOM AND BOBBIE ALTMAN**

:

**V.**

:

**Docket No. C-2018-3006434**

**WEST PENN POWER COMPANY**

:

**RESPONSE AND OBJECTION TO WEST PENN POWER'S MOTION TO DISMISS**

Complainant requests the ALJ to deny the Respondent's Motion to Dismiss for the following reasons:

1. Complainant Bobbie Altman fell and broke her left hip shortly after the Complaint was filed, specifically the beginning of January, 2019. A Hemi Hip Replacement was required to repair the hip, from which she is still recuperating.
2. In April, 2019, Complainant Bobbie Altman underwent a Left Shoulder Replacement on the same side of her body, from which she is still recuperating. Claimant Bobbie Altman is left- hand dominant so the left hand was weak and useless for writing or typing until after an extensive amount of rehabilitation.
3. Complainant Tom Altman could not complete the requested documents because his time has necessarily been taken up caring for Complainant Bobbie Altman.
4. In addition, Complainant Tom Altman has been involved with two other law suits, one in Superior Court and another in Common Pleas Court in another county concurrently with his litigation with the PUC and West Penn Power, neither of which is in the jurisdiction of the ALJ.
5. Complainants have not been willfully avoiding responses to West Penn Power, but have not been able to carve enough time out of their days to put forth the necessary effort to make timely responses.
6. Complainant **DID NOT** receive a Certificate of Service as stated on Respondent's letter to Secretary Chiavetta of the Pennsylvania Public Utility Commission or any other supporting documents.

Wherefore, the Complainant submits this response and respectfully objects to Respondent's request for dismissal for Motion to Dismiss the above captioned docket number and, further, request additional time to make their response.

Respectfully submitted,

Dated: November 26, 2019



Tom Altman



Bobbie Altman

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

TOM AND BOBBIE ALTMAN

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CERTIFICATE OF SERVICE

We hereby certify that we have this day served a true copy of the *Response and Objection To West Penn Power's Motion To Dismiss* upon the individuals listed below.

Service by electronic and First Class Mail, postage prepaid, as follows:

***Via E-filing:***

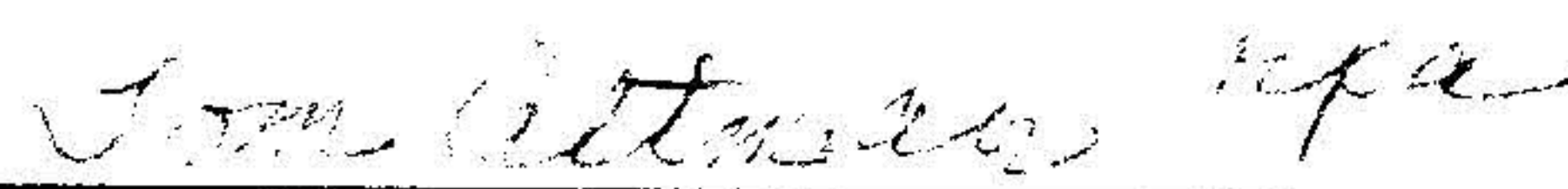
Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street, 2<sup>nd</sup> Floor  
Harrisburg, Pa. 17120

**Via E-filing and Certificate of Service:**

Administrative Law Judge Jeffrey Watson  
Pennsylvania Public Utility Commission  
Piatt Place, Suite 220  
301 5th Avenue  
Pittsburgh, PA 15222

Tori Giesler, Esquire  
First Energy Service Company  
2800 Pottsville Pike  
P.O. Box 16001  
Reading, Pennsylvania 19612-6001

Dated: November 26, 2019

  
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Tom Altman

  
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Bobbie Altman