

**BEFORE THE
PA PUBLIC UTILITY COMMISSION**

DEBORAH A. REDMAN,

Complainant

V.

FIRST ENERGY AND PENELEC,
CHARLES E, JONES, JR.
CEO, FirstEnergy Corp.
76 Main St.
Akron, OH 44308,

Respondent

No. C-2019 -3013582

(submitted via mail 11 December 2019)

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**COMPLAINANT'S OPPOSITION TO
RESPONDENT'S REQUEST FOR MEDIATION
AND
MOTION FOR SUMMARY JUDGMENT**

Comes now Complainant Dr. Deborah A. Redman and moves for summary judgment and opposes referring this matter to mediation for the following reasons.

1. By way of background, Penelec Attorney Morris inserted a "New Matter" into her Answer, requesting mediation. Her reason for advocating mediation, set forth in par. 14 (p. 6) of her Answer, is that "time and resources of the Commission and the parties will be conserved" if the matter goes to mediation.

2. Mediation will not save time, but this Motion for Summary Judgment will since motions for summary judgment by their nature promptly dispense with cases as they are based on the obvious and indisputable. There is no reason for mediation because the parties and others involved in this matter are obliged to adhere to the law. And the law

requires that the power companies, First Energy and Penelec, must destroy the wisteria because the state of Pennsylvania has *designated wisteria as an invasive species that poses an "ecological threat" and must be controlled, i.e., killed and removed.*¹ *Adherence to the law means the wisteria must be destroyed.*² ***The wisteria is on the power lines so it is the responsibility of the power companies to destroy it.***

3. This case is also over because First Energy did not appear, signaling that it concurs with Complainant's position. *See* Complainant's Response to Respondent's Answer, section II.

4. Complainant has moved to transfer this case to a lay body of Meadville/Erie residents willing to hear it. That will relieve the burden of PUC, which surely has a considerable case load. It is also proper because of concerns about neutrality.³ Certainly demanding so much from Complainant, who is permanently disabled, when she is being

¹ *See* the PA Department of Conservation and National Resources (DCNR) fact sheet "Invasive Species in Pennsylvania: Chinese and Japanese Wisteria," available in flier form from the state and as a PDF on the DCNR website. A copy is annexed as ***Att. 1*** for the convenience of the parties. *See also* Dr. Redman's Response to Respondent's Answer.

² It is common sense that one would not support further self-propagation of the wisteria or it will

- damage the power lines,
- bring down the rest of the vegetation on the property and neighboring properties,
- destroy the structures on the property and neighboring properties, and
- if impeded, eventually take over the entire town of Meadville.

³ Consider especially Complainant's letter to PUC dated 9 Oct. 2019, which stresses that the power companies' representative Ricky Wijaya was flagrantly biased, and Complainant's Response to Respondent's Answer, section III.

subjected to all the problems described in her Response to Respondent's Answer, is not fair. Transferring the case obviates concerns about impartiality.

Whereupon, Complainant moves for Summary Judgment and renews her request that the Complaint be transferred to an impartial lay body.

Yours respectfully,

Deborah A. Redman

Deborah A. Redman
414 Park Ave.
Meadville, PA 16335
Tel: 814-853-3770

Wednesday, 11 December 2019 (put in U.S. mail with her Response to the Answer)

Verification: I, Deborah A. Redman, hereby state that the facts set forth above 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).

Date: 11 Dec. 2019

Deborah A. Redman

Deborah A. Redman

CERTIFICATE OF SERVICE

I hereby certify that on this **11th day of December 2019** I served a copy of this Opposition on Attorney Margaret A. Morris at Reger Rizzo Darnall, Cira Centre, 13th Fl., 2929 Arch St., Philadelphia, PA 19104 by putting a copy in the U.S. mail, postage prepaid.

Deborah A. Redman

Deborah A. Redman

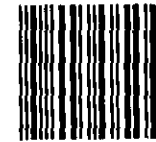
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400 North St.
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