

**Re: Docket No. C-2019-3013785
Bradley S. Tupi and Ann Marie Clyne v. West Penn Power Company
Answer to Complainants' Motion to Compel**

Attachment 1

Affidavit of M. Shawn Hindman

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

BRADLEY S. TUPI & ANN MARIE CLYNE:

v.

WEST PENN POWER COMPANY

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Docket No. C-2019-3013785

Affidavit of M. Shawn Hindman

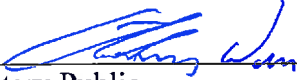
M. Shawn Hindman, being duly sworn according to law, deposes and says the following:

1. My name is M. Shawn Hindman and my business address is 2800 E. College Ave, State College, PA, 16801.
2. I am employed by West Penn Power Company as a reliability engineer.
3. As a reliability engineer, I am responsible for addressing and responding to the Discovery propounded by Bradley S. Tupi & Ann Marie Clyne (Complainants) associated with the Formal Complaint filed in the above-referenced docket.
4. As part of my job responsibilities, I am familiar with West Penn's business records relating to the reliability of the Clifton Circuit which serves the Complainants.
5. I have produced all documents in West Penn's business records regarding the outages that impacted the Complainants' service as requested in ¶¶ 9-13, ¶¶41-43, ¶¶ 52-55, and ¶¶ 56-59, of the Motion.
6. West Penn's mapping system does not contain house numbers for the Deerfield Manor in ¶¶ 14-17 of the Motion. Rather the mapping system identifies the location of its facilities throughout its service territory.

I am authorized to submit this affidavit for and on behalf of West Penn Power Company and represent that the facts set forth herein are true and correct to the best of my knowledge, information and belief. I understand that false statements therein are made subject to the penalties of 18 Pa.C.S. § 4904, relating to unsworn falsifications to authorities.


M. Shawn Hindman

Sworn and subscribed before me this 28th
day of April 2020.



Notary Public
My commission expires on: 12/16/22

