

Deborah A. Redman
414 Park Avenue
Meadville, PA 16335
Tel.: 814-853-3770
(daredman@verizon.net)

Tuesday, May 12, 2020

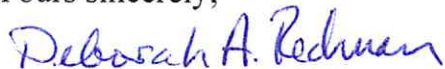
Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
400 North St.
Keystone Bldg.
Harrisburg, PA 17120

RE: Docket No. C-2019-301 3582, *Redman v. FirstEnergy, Penelec, & CEO Jones*
Submitted for filing – Complainant’s First Supplement to Complaint

Dear Secretary Chiavetta,

Attached for filing is a copy of Complainant’s First Supplement to Complaint, which reports on damage to neighboring property 404 Park Avenue in Meadville.

Yours sincerely,



Dr. Deborah A. Redman

Encl.

cc: Attorney Margaret A. Morris
Office of Administrative Law Judge

**BEFORE THE
PA PUBLIC UTILITY COMMISSION**

DEBORAH A. REDMAN,	*	
	*	
Complainant	*	No. C-2019-3013582
	*	
V.	*	
	*	
FIRST ENERGY, PENELEC, and CHARLES E, JONES, JR. CEO, FirstEnergy Corp. 76 Main St. Akron, OH 44308,	*	
	*	
Respondents	*	Tuesday, 12 May 2020 (mailed)
	*	

**FIRST SUPPLEMENT TO COMPLAINT AGAINST
FIRSTENERGY AND PENELEC
(Neighboring property damaged by wisteria vines)**

Comes now Complainant Dr. Deborah A. Redman and supplements her Complaint with the following information:

- (1) documentation of *damage to the property adjoining 414 Park Avenue – the neighbor to the north, 404 Park Avenue – due to wisteria infestation,*
- (2) notice that 404 Park Avenue is being repaired and in that process a *part of the wisteria vine (“tree”) has been removed* as of May 9, 2020.¹

Three photos are attached, all taken in March 2020, as excavation of the lawn and repairs to the house were being undertaken. The excavators confirmed wisteria damage.

¹ The wisteria “tree” is an old, half-dead apple tree that was planted next to the wisteria plant. Through the years, the apple tree has been completely overcome by the wisteria plant, hence death to roughly two-thirds of the apple tree as of May 2020.



Photo N-1
(404 Park Avenue)

Photo N-1 shows part of neighboring property 404 Park Avenue (which is the neighbor to the north of 414 Park Avenue), specifically

- (a) the new foundation on the front of 404 Park Avenue,
- (b) roots of the wisteria plant that were dug up by an excavator,
- (c) dead wisteria vines and debris hanging from the wisteria “tree” to the side of 404 Park Avenue.

Photo N-2
(404 Park Avenue)



Photo N-2 shows a close-up of the new foundation being put in (both the gray and black sections) by construction firm TRW at neighboring property 404 Park Avenue. The new foundation was built in March, April, and May 2020, as the work was interrupted by the coronavirus pandemic and Pennsylvania Governor Wolf's shutdown of nonessential work. TRW's employees on site told Dr. Redman that they had to put in the new foundation because the wisteria plants had infiltrated and destroyed the old foundation along the south side of the house and on the south (lower) half of the front.

Photo N-3
(404 Park Avenue)



Photo N-3 shows a close-up of the wisteria roots in the lawn (pulled up by an excavator in the TRW construction crew) on neighboring property 404 Park Avenue. The base of the wisteria “tree” is in the background (center top of photo). The area parallel to the side of 404 Park Avenue was cleared of all but one tree in March, April, and May 2020, as the work was interrupted by coronavirus pandemic and Governor Wolf’s shutdown of nonessential work. One can see in this photo how large the roots are, but they are not the largest ones removed by the excavation company.

The photographs show how damaging wisteria is to its environment – the reason it is designated as an invasive species that must be controlled. Given the size and volume of the wisteria roots – 414 Park Avenue and its four neighbors are overrun – the sewage system at 414 Park Avenue has to be affected. It is easy to see that the wisteria on the border of 414 and 404 Park Avenue has not been controlled and has greatly damaged 404 Park Avenue.² Dr. Redman filed a Complaint with PUC in part because she has to unclog her toilets daily due to wisteria roots in the sewer system. That means using a plunger, which *aerosolizes the sewage water and causes splash-back onto her and her clothes. In other words, Dr. Redman (who is mobility-impaired and chronically ill) is coated with sewage every time she has to unclog a toilet, which is at least daily. She is also weakened and destabilized from standing and exerting herself.*³

In addition to the disintegration of the foundation facing south and front on 404 Park Avenue, there has been damage to the siding, roof, and gutters. (Similar damage exists to buildings at 414 Park Avenue.) All this demonstrates how urgently relief is needed on all affected properties.

Yours respectfully,

Dr. Deborah A. Redman

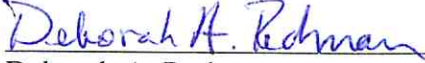
² By way of reminder, there are four properties besides 414 Park Avenue on which one can see evidence of wisteria invasion, one behind the property and two south (down the street) on Park Avenue.

³ See, e.g., Complainant's Response to Respondent's Answer.

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Tel: 814-853-3770

Tuesday, 12 May 2020 (put in U.S. mail)

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. I understand that the statements herein are made subject to the penalties of 18 Pa C.S. §4904 (relating to unsworn falsification to authorities).


Deborah A. Redman

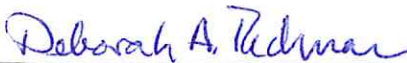
CERTIFICATE OF SERVICE

I hereby certify that on this 12th day of May 2020 I served a copy of this First Supplement to Complaint on the following by putting a copy in the U.S. mail, postage prepaid, to

Attorney Margaret A. Morris
Reger Rizzo Darnall
Cira Centre, 13th Fl.,
2929 Arch St.
Philadelphia, PA 19104

Pa Public Utility Commission
Office of Administrative Law Judge
Piatt Place, Suite 220
301 Fifth Avenue
Pittsburgh, PA 15222

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