

September 11, 2020

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SEP 11 2020

PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU


Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street, Second Floor  
Harrisburg, PA 17120

**RE: Christopher and Valerie Watson v PECO Energy Company**  
**Docket No. C-2020-3021127**

Dear Ms. Chiavetta:

A copy of Christopher and Valerie Watson's Response to PECO's **Answer and New Matter** is enclosed for filing.

Very truly yours,

*Valerie Watson*  


/s/ Valerie Watson

/s/ Christopher Watson

Christopher and Valerie Watson  
630 Morris Ave  
Bryn Mawr, PA 19010  
610 733 4004  
valerielevesque24@hotmail.com

cc: Certificate of Service



1. We do not have sufficient information to form a belief on the amount of voltage carried by the lines and would like proof at hearing. Further, PECO states “approximately 15 neighboring properties” are served by this line. I’m assuming PECO is counting my house (630 Morris Ave) and the home of my neighbor (628 Morris Ave) in that number. Both of these homes (630 Morris Ave and 628 Morris Ave) could get power directly from facilities on Morris Ave instead of the existing arrangement where the power transverses our property and is fed back from transformers on an adjacent property. We are asking for proof at a hearing as to the exact number of properties, and the addresses of said properties, that the line on our property feeds.

*On page 4 of PECO’s Answer it says: The allegation that PECO’s facilities are in the Watson’s “back yard,” is admitted in part and denied in part. The PECO facilities on the Watson property enter the property from Morris Avenue, which is at the front of the Watson property. The PECO facilities then proceed along the side edge of the Watson property, and thus also might be characterized as crossing the side yard. The facilities continue down the side property line to the rear of the property, where they continue as a pole line on neighboring property.*

2. To answer this question our house sits on its side. Please see exhibit 1 plot plan and exhibit 2 aerial shot. The wires we are referring to come from Morris Ave and extend into our back yard, where the majority of our land is. I have drawn on the plot where the lines are for the court’s reference.

*On page 4 of PECO’s Answer it says: “Mr. Watson makes the subsidiary allegation that: “PECO has no easement in title or deed what so ever for” its facilities. This is a conclusion of law to which no answer is required. However, to the extent that this claim requires an answer, it is denied. By way of further answer, PECO’s facilities have been in place at this location since the 1920s or 1930s and, even if PECO did not originally obtain an easement at that time, it has since developed a property right over time through the legal theories of adverse possession, easement by prescription, or other action of law.”*

3. We have asked PECO to provide us with the written easement for their facilities. They have not provided us with any easement, and no easement exists in our deed. In addition, PECO writes in their Answer and New Matter that “even if PECO did not originally obtain an easement at the time”. Our conclusion from this language, and from their failure to produce an easement, is that they did not secure a written easement for their facilities. If they have one we ask for proof at hearing.

Because they have no written easement, PECO is claiming that they have developed a property right over time through other legal theories, one of which is easement by prescription. In order for this theory to apply, PECO’s use of the property must be adverse, actual, open and notorious, continuous and uninterrupted, and for the statutorily required period of time. PECO’s facilities do not meet the

standard for an easement by prescription, because use of the property was permissive prior to our request for them to leave. It is obvious that the previous owner granted permission for utility lines to be placed on the property, as no reasonable property owner would allow facilities to be placed in this location without first providing permission. In addition, no reasonable company would invest money to construct such facilities in their location without first receiving permission from a property owner, as their investment in the facility could be for naught if the property owner simply asks them to move. Since permission must have existed, it cannot be determined that use of the property is "adverse" until we asked PECO to remove their facilities. Since this request from us was not more than 21 years ago, the criteria for PECO to secure an easement by prescription has not been met.

PECO is also claiming that it is possible they have a property right through the legal theory of adverse possession. In order for adverse possession theory to be applicable, use of property would need to be actual, continuous, adverse, open and notorious, exclusive, and for the statutorily required period of time. See above for explanation about why we believe the use is not adverse for the required period of time. In addition, the PECO facilities do not meet the standard for being "exclusive". Use of the property is shared with the owners and, until recently, was shared with other utilities, namely Comcast, Verizon and Telephone Companies. Note that both Comcast and Verizon moved their facilities after it was brought to their attention that no easement existed for said facilities.

For reference, see *Samuel Messina v. Bell Atlantic-Pennsylvania, Inc*, Docket No C-00968225 (order entered Sept 23, 1998). This case provides a framework for the current matter in front of the PUC, as it involves a property owner requesting removal of Bell Atlantic wires and addresses many of the points made above. Ultimately the PUC ordered Bell Atlantic needed to remove their wires because they did not have an easement.

PECO is saying its wires have been there since the 1920s or 1930s, therefore proof of this is requested at the hearing.

*On page 4 of PECO's Answer it says: "As to the date that the Watson's moved into their home, PECO does not have sufficient information to form a belief, and this claim is therefore denied;"*

4. We purchased our home 3/10/2010. Please see exhibit 3 from Montgomery County Property Records.

*On page 4 and 5 of PECO's Answer it says: "As to Ms. Watson's claim that she "only recently found out that PECO has a high voltage wire going straight through the side of our yard," that claim is denied.*

*First, the PECO facilities are openly visible and have been for decades; Ms. Watson must have observed them prior to purchasing the residence” “As to Ms. Watson’s claim that PECO’s facility’s pass just a few feet from our home,” that allegation is denied. By way of further answer, PECO has measured the lateral distance from the structures (house and garage) to PECO’s conductors and its conductors are at least nine feet horizontally from structures along the length of the line. By way of further answer, under the National Electrical Safety Code, these facilities are required to be located five feet horizontally from structures.”*

This response refers to language from the formal complaint “We moved into our home eight year ago, but only recently found out that PECO has a high voltage wire going straight through the side of our yard passing just a few feet from our home. Please see the pictures below. These wires are right next to my infant son’s bedroom.”

5. We assumed the wires in our back yard were innocuous cable, phone and electric for our own house, not what PECO says is 15,000 volts of electricity passing through our property to an adjacent neighborhood that is not land locked. We had several wires on the poles in our yard that all look alike. They are all black non-labeled with no distinguishing characteristics. How would a lay person know the difference between a cable line and primary electric cable? Please see exhibit 4 which shows the wires on our property.

We brought this issue to PECO’s attention in 2019, in light of the addition we are planning above our garage and the interference PECO’s wires pose with the plan of that addition with only 9 feet of space between. In February 2019 we submitted a new construction application with PECO. It was after that application was filed that we found out from PECO about the number of cables and the voltage on the primary cable. When we found out in 2019 the easement did not exist for any of the utilities on property both Verizon and Comcast removed their wires from the same poles leaving only PECO on our property. In regards to PECO’s claim about the National Electrical Safety Code five feet of safety distance, proof of this is requested at a hearing.

*On page 5 of PECO’s Answer, regarding a cancer diagnosis for a former owner of the property, it says: “PECO does not have sufficient information to form a belief as to this allegation. It is therefore denied and proof at hearing is demanded.*

6. Specifically, this refers to language in the complaint stating “The previous owners son (Ryan Pollie) who lived in this home for ten years was just diagnosed with cancer in 2019.” A piano tuner who came to my home told me he knew the previous owners, Shara and Bill Pollie, and their son had

just been diagnosed with cancer and underwent surgery. A social media search confirmed this information with pictures of him recovering from his surgery in the hospital. He also wrote about his cancer diagnosis. I showed Mr Ward Smith from PECO these pictures when he came over to our home in talks about the electric wires.

*On page 5 of PECO's Answer, regarding discomfort with the proximity of power lines to our home, it says: "PECO does not have sufficient information to form a belief as to the basis for Ms. Watson's discomfort. That allegation is therefore denied and proof at hearing is demanded. PECO denies that it has been scientifically demonstrated that exposure to EMF from its facilities causes or contributes to childhood cancer."*

This refers to language from the formal complaint stating: "The research on childhood cancers associated with EMFs and the proximity to my children's rooms makes me uncomfortable as a mother." The basis for the discomfort is as follows:

7. A 2009 Update from The Scientific Committee on Emerging and Newly Identified Health Risks (SCENIHR) of the European Commission states: "The past conclusion that extremely low frequency magnetic fields are possibly carcinogenic is still valid. This was concluded based on studies indicating that children exposed to relatively strong magnetic fields from power lines were more likely to develop leukemia. New studies on human populations indicate a possible increase in Alzheimer's disease arising from exposure to extremely low frequency fields. ." [https://ec.europa.eu/health/scientific\\_committees/opinions\\_layman/en/electromagnetic-fields/index.htm#10](https://ec.europa.eu/health/scientific_committees/opinions_layman/en/electromagnetic-fields/index.htm#10)

A UK consumer advocacy organization, Powerwatch, reports the following regarding power lines, EMF and association between diseases: "Current research has mainly concerned magnetic fields, not only from high voltage power lines from the electricity supply in general. The evidence points towards an association between exposure to magnetic fields and childhood leukaemia (references below), adult leukaemia [Tynes 2003, O'Carroll 2008], neurodegenerative diseases (such as amyotrophic lateral sclerosis) [Eychting 2003, Hakansson 2003, Ahlbom 2001]..." and a few others. In addition, the organization states "A 2008 meta-analysis from Spain found a strongly statistically significant doubling in risk for Alzheimer disease (CI 1.51-2.80) [Garcia 2008]." <https://www.powerwatch.org.uk/elf/powerlines.asp#ref9>

*On page 6 of PECO's Answer it says: "PECO admits that Ms. Watson has previously informed PECO that she is planning a second floor addition to her garage. PECO does not have sufficient information*

*regarding the pendency of said plan, or as to whether the Watson's have taken material steps to create construction planning documents or obtain permits for said addition, and proof of the pendency of the plan is thus demanded at hearing. "*

This refers to the following from our formal complaint: "All of this information came to light because we are planning a second floor in-law suit addition to our existing free standing garage. PECO's wires would interfere with this addition since they would hit each other."

8. We are currently working with an Architect to improve several areas of our home. The expansion of the garage was something we hoped to have tied into a kitchen renovation planned for this year. PECO's New Business Engineer Stephen Reilly in a letter to us (exhibit 5) said "*I assume the construction is staying within the existing footprint of the garage and it will not have any horizontal "bump outs" in the direction of PECO's existing lines.*" So our interpretation of that statement is that the roof on the addition could only be a flat roof as to not conflict with PECO's current line. This is interfering with the use of our property and dictating the scope of our project and design of the structure.

*On page 6 of PECO's Answer it says: As to the statement that PECO's facilities "would interfere with this addition" to the Watson garage, that allegation is denied." "PECO will work with the contractor to make its facilities safe for such work.*

9. Once the garage is constructed, it will still need to be maintained in terms of roof work over the years with item such as gutter cleaning, painting, and other typical areas of maintenance. The clearance from the structure to the electric lines would create a safety issue with respect to these regular maintenance activities and the possibility of accidental contact. As to the reference of "interference" please see the section above about not being able to have a "bump out" on the structure.

*On page 7 of PECO's Answer it says: "Admitted that Mr. Reiley informed Ms. Watson that the line across her property provides service to her neighbors and, in an attempt to create empathy for her neighbor's situation, tried to explain the importance of keeping electric service on to her neighbors. Admitted that, during that initial discussion, Mr. Reiley estimated that it would cost in excess of \$1 million to reconfigure the system if the line across the Watson property is removed. Denied that these were intimidation tactics. As to whether Ms. Watson felt that they were intimidation tactics, PECO does not have sufficient information to form a belief as to those allegations, they are therefore denied and proof at hearing is demanded. Denied that Ms. Watson is being asked to pay \$1 million."*

10. This refers to the following content from our complaint: “This is in regards to an initial phone call I had with PECO about this issue: “On that phone call with Mr Fister was PECO’s Engineer Steve Reilly. Mr. Reilly ask me if my power were to go off, would I want PECO to turn it back on. I feel like this comment was used to intimidate my family. That same day Mr. Reilly came to my house and told me it would cost us one million dollars to move the high voltage wires from our backyard. Again, I felt like this was an intimidation tactic and threat on PECO’s part. My question to PECO is why am I being asked to pay 1 million dollars or any amount, to supply power to a few houses behind me?”

This statement from Mr. Reilly about the 1 million dollars we would have to pay was made right in front of PECO’s Joe Chiswell from your New Business DelChester office. In addition, days later on 4/1/2019 , Mr. Stephen Reilly, New Business Engineer from PECO emailed me a letter saying, “PECO can investigate alternative methods of providing service to those residence, but understand that you would have to pay the cost of relocating PECO’s facilities. If you wish to pursue that option, PECO can do a high-level estimate of the cost of relocation. At that point, we would need a non-refundable deposit of 10% of the estimated cost, which we would use to fund detailed design work and provide a final cost to you. Let me know if you would like to proceed with a relocation analysis and I can provide the high-level estimate to start the process.” This quote is from the last paragraph of the emailed letter and is provided as exhibit 5.

PECO’s letter demonstrates that there are viable alternate routes to provide distribution to the homes served by the current distribution line – otherwise why would they be asking us to fund the design and construction effort. As for the \$1 million dollar cost estimate, Mr Smith sent me an email a few months later, on 11/20/2019 (see Exhibit 6) saying after further consideration, PECO estimated the project cost to be \$400,000, not \$1 million dollars. In this cost estimate, Mr Smith communicated that the PECO’s analysis revealed that a few poles would need to be replaced to carry primary cable, but that PECO would also then choose to replace all of the poles down a portion of the block. Therefore, they conclude that the entire block would need to be reconstructed, thus costs would rise to \$400,000. We still believe this is an overestimate, as it involves construction of an entire block of poles when only a few poles need to be replaced to support the PECO service. These inflated cost estimates make it appear as if the movement of the lines would be more difficult than it would actually be. In addition, since we assume PECO has easements for their facilities on other properties, we see the movement of the lines as necessary to bring them back into compliance with property laws.

*On page 7 of PECO's Answer it says: "Denied that there are power lines all over the neighborhood that could be used to supply the 15 residences currently served by the facilities that cross the Watson property.*

This refers to the following content from our complaint: "There are power lines all over the neighborhoods behind me. I find it hard to believe PECO in this day and age can not reroute these few customers instead of running the wires through my back yard. "

11. To our knowledge, PECO has not completed an independent analysis of the current distribution configuration on my property. When Mr. Ward Smith, General Counsel for PECO came over to talk about their wires on October 10, 2019, he was accompanied by Stephen Reilly , the same engineer who estimated it would cost us \$1M for PECO to move its lines due to the lack of an easement. Mr. Reilly communicated this information on the same day he was made aware of the situation over a lack of easement, before any in-depth analysis over the situation was made by PECO. These homes in the adjacent neighborhood are not land locked and there are other viable routes with which PECO can provide them with power. There is no necessity to run the wires through our yard out of mere convenience.

*On page 8 of PECO's Answer it says: "Admitted that Ms. Watson requested that PECO reduce the sag on the conductors in her yard so that Verizon and Comcast could do work on their facilities located in the communications space on PECO's poles. Denied that PECO has not maintained its facilities. ...PECO has offered to replace the third pole on Ms. Watson's property, which could further reduce the sag, and she has refused that offer and refused PECO access to her property to perform any additional maintenance work on its facilities.*

This refers to the following language from the complaint: "Lastly, PECO has not maintained its high voltage wires on my property over the years including a sagging wire that I called at least three times about in 2019. The lines and poles at 630 Morris Ave, despite phone calls to PECO have been neglected and are in poor shape resorting to abandonment."

12. We have not refused access to our property, rather I emailed Mr. Ward Smith at PECO on 7/7/2020 saying, "My neighbor called PECO last week about a light flickering issue we have had over the years in both homes. One of your workers came over to check out the situation and said someone from PECO would be coming back over the look into the matter further. Since there is no easement, I would like to please be made aware of any and all work that might need to be done to this line with regards to that matter." Please see email exhibit 7.

13. Furthermore on the issue on abandonment, PECO did fix the primary line in our yard after several phone calls, but they fixed it by holding it up with a rope. This feels like an unprofessional repair not a safe or permanent one. Please see a picture of the rope in exhibit 8. In addition, Verizon informed us that they could not vouch for the integrity of the poles and electricity since the tension of their cable wire was helping to hold the pole up. I called PECO about this issue and a foreman Tim Nolan was sent out. There were no additional steps taken on PECO's end after this discussion and Verizon took its lines down this spring, I informed Ward Smith about this concern raised by Verizon in an email to him on 6/22/2020. Please see exhibit 7. Still there was no action taken on the part of PECO about the integrity of the poles and electric wires.

## **SECTION II. COMMENTS & RESPONSE TO PECO'S NEW MATTER**

The following section provides our response to the New Matter section of PECO's Response and New Matter provided on August 24, 2020. In some cases, our comments are simple re-statements of information included previously in this document.

1. *The PECO facilities located on 630 Morris Avenue are comprised of: (a) three wooden distribution poles; (b) a single phase primary cable with a maximum operating capability of 15kV, which is operating at approximately 13kV, which initiates from a pole on Morris Avenue and is connected to each of the three poles on the premise of 630 Morris Avenue; the 15kV primary cable and associated transformer(s) then continues across the back boundary of approximately 15 neighboring properties and is the sole source of electric service to those properties; (c) a service conductor, returning from an aerial transformer located on a pole on an adjacent property, which is used to provide single-phase 120/240 kV service to 630 Morris Ave and the neighboring property at 628 Morris Avenue.*

Answered in section 1

2. *The PECO facilities on the Watson property enter the property from Morris Avenue, which is at the front of the Watson property. The PECO facilities then proceed along the side edge of the Watson property, and thus also might be characterized as crossing the side yard. The facilities continue down the side property line to the rear of the property, where they continue as a pole line on neighboring property.*

Answered in section 2

3. *PECO's facilities on 630 Morris Avenue have been in place at this location since the 1920s or 1930s.*

PECO is saying the wires have been there since the 1920s or 1930s, therefore proof of this is requested at the hearing.

*4. PECO's facilities on 630 Avenue are openly visible and have been for decades.*

Answered in section 5

*5. Ms. Watson was aware that PECO's facilities were located on the property at 630 Morris Avenue prior to purchasing the residence.*

Answered in section 5

*6. PECO has measured the lateral distance from the structures (house and garage) to PECO's conductors, and its conductors are at least nine feet horizontally from the structures along the length of the line.*

Answered in section 9

*7. PECO previously informed Ms. Watson of these measurements.*

Yes in our meeting I was informed of the measurement.

*8. PECO has offered to Ms. Watson that, if construction of the second floor addition to the garage will require the Watson's contractor to perform construction tasks in close proximity to PECO's conductors, PECO will work with the contractor to make its facilities safe for such work.*

Answered in section 9

*9. PECO has offered to reroute the 15kV line underground, elsewhere on Ms. Watson's property at a mutually-agreeable location, at PECO's cost.*

Yes this offer was made several months ago and just this week September 9, 2020 PECO sent us an email about their engineers coming over to look into that reroute. To date I don't have a route plan for the lines or what the construction would entail. I have expressed concerns about diminished property value with burying the lines since we would have to agree to an easement in exchange. I have also raised concerns over our tree root systems, irrigation, dog fence, outdoor lighting and the

fact that the EMFs will be stronger in the ground since they will be closer. Without more details from PECO about this plan we can not make an informed decision on this matter at the present time.

*10. PECO informed Ms. Watson that it has analyzed alternative supply options for the 15 residences currently served by the facilities that cross the Watson property, and all of the options would require extensive construction and/or tree removal work on her neighbors' properties.*

Answer in section 11. In addition, PECO must already have easements for the properties that are connected to the electric lines on our property. They have not shared the route with us when asked sighting security concerns, but it appears the lines go into rear properties. So we are wondering why tree removal would be needed when the poles and PECO lines already exist in those backyards. Proof of which trees would need to be trimmed and or cut in neighboring yards is requested at a hearing.

*11. PECO fielded a crew and reduced the sag in the existing conductors, as requested, on April 10, 2019.*

Answered in section 13

*12. Ms. Watson has since informed PECO that Comcast and Verizon performed the work for which she requested that the sag be reduced.*

Answered in section 13

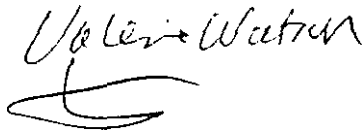
*13. PECO has offered to replace the third pole on Ms. Watson's property, which could further reduce the sag, and she has refused that offer and refused PECO access to her property to perform any additional maintenance work on its facilities.*

Answered in section 12

Respectfully submitted,

/s/ Valerie Watson

/s/ Christopher Watson



Christopher and Valerie Watson  
630 Morris Ave

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Bryn Mawr, PA 19010

610.733.4004

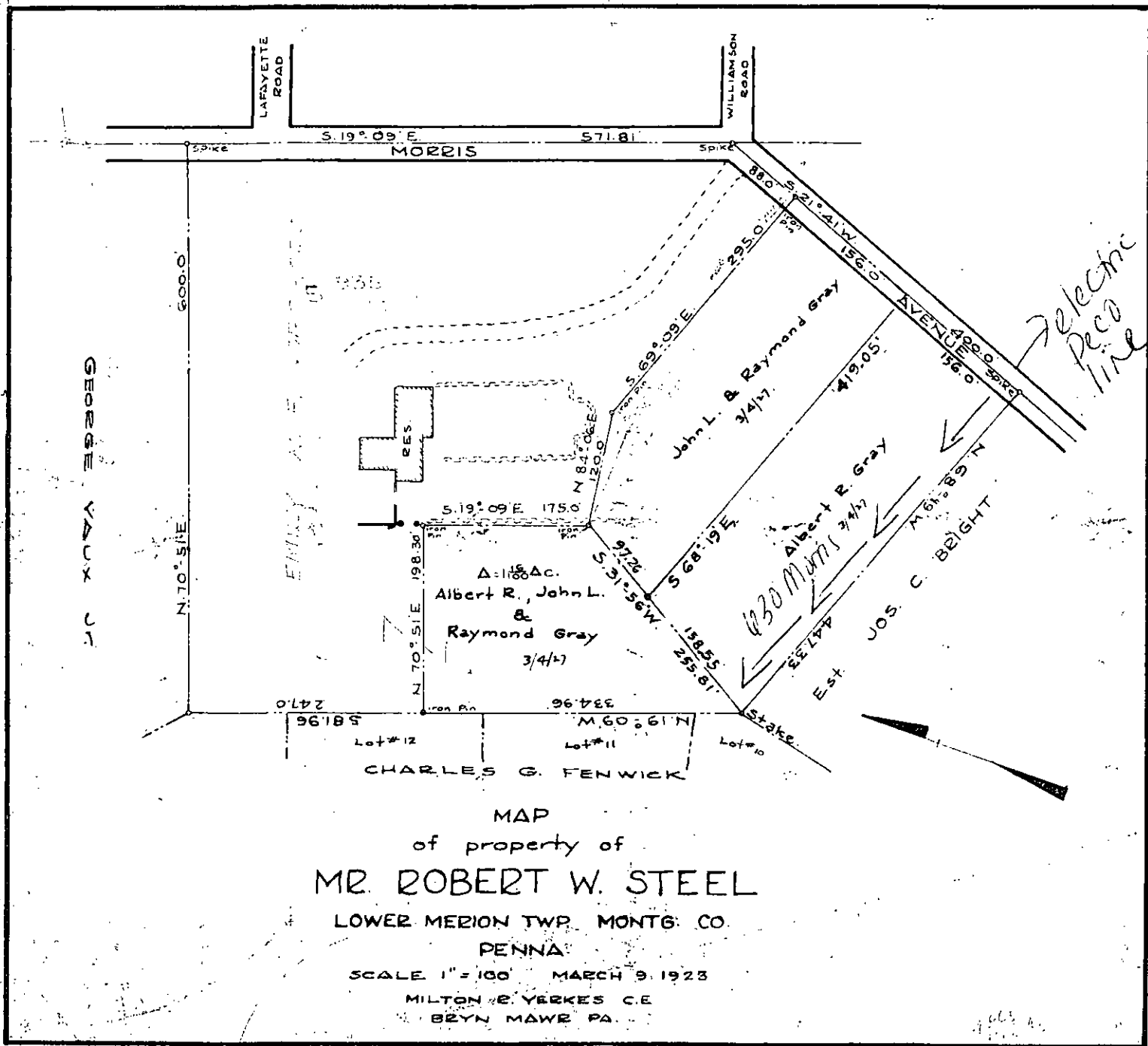
valerielevesque24@hotmail.com

Exhibit 1

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MAP  
of property of  
**MR. ROBERT W. STEEL**  
LOWER MERION TWP. MONTG. CO.  
PENNA.  
SCALE 1" = 100' MARCH 9, 1923  
MILTON E. YERKES C.E.  
BEYN MAWR PA.

S-185



Profile

PARID: 400041080001  
WATSON CHRISTOPHER & VALERIE

630 MORRIS AVE

1 of 1

[Return to Search Results](#)

Parcel

TaxMapID 40010C041  
 Parcel 40-00-41080-00-1  
 Land Use Code 1101  
 Land Use Description R - SINGLE FAMILY  
 Property Location 630 MORRIS AVE  
 Lot #  
 Lot Size 64846 SF  
 Front Feet 156  
 Municipality LOWER MERION  
 School District LOWER MERION  
 Utilities ALL PUBLIC//

Actions

- [Printable Summary](#)
- [Printable Version](#)

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Owner

Name(s) WATSON CHRISTOPHER & VALERIE  
 Name(s)  
 Mailing Address 630 MORRIS AVE  
 Care Of  
 Mailing Address  
 Mailing Address BRYN MAWR PA 19010

Current Assessment

Appraised Value	Assessed Value	Restrict Code
628,580	628,580	

Estimated Taxes

County	2,174
Montco Community College	245
Municipality	2,634
School District	18,966
Total	24,019
Tax Lien	Tax Claim Bureau Parcel Search

Last Sale

Sale Date 01-MAR-10  
 Sale Price \$1,150,000  
 Tax Stamps 11500  
 Deed Book and Page 5760-00472  
 Grantor POLLIE WILLIAM & SHARA  
 Grantee WATSON CHRISTOPHER & VALERIE  
 Date Recorded 03-MAR-10

Contact Us

1-800-787-0000

exhibit 4

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exhibit 5  
(1 of 2)



**PECO ENERGY**

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RE: 330 Morris Ave; Bryn Mawr, PA 19010

SEP 11 2020

Dear Valerie:

PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

I am following up from our meeting at your home on 4/1/19.

As we discussed PECO has the job scheduled for this week weather dependent to fix the sagging cable between the two poles in your backyard.

You informed me that you are planning to construct a second level on top of your existing garage and are concerned about the PECO aerial facilities that run along your property line and the clearance between PECO's existing facilities and the garage extension that you plan to build next to the existing PECO facilities.

The National Electrical Safety Code requires a horizontal safety clearance between your garage and these PECO wires of five feet. According to the measurements I took in the field, the clearance between the existing PECO facilities and your garage is nine feet, so the current configuration is in compliance with the safety clearances of the NESC. Although you have not shown me any plans for the addition, I assume the construction is staying within the existing footprint of the garage and it will not have any horizontal "bump outs" in the direction of PECO's existing lines. If this is the case, then the addition should also be nine feet horizontally from PECO's existing wires, and it will also be in compliance with the NESC safety clearances.

If your contractor has concerns that, during construction to extend your garage, he may come so close to the PECO lines that he violates OSHA or other safety clearances, he can request a free "make safe" service from PECO.

You also expressed concern about EMF associated with PECO's facilities. Pennsylvania does not limit EMF from utility distribution and transmission facilities. However, in 2010 a group of local residents did not want a PPL transmission line built near their homes and requested an extensive evidentiary hearing regarding EMF and

health. The Commission found that there is no reliable scientific basis to conclude that the exposure to power frequency EMF will cause or contribute to adverse health effects in children or adults. Similar conclusions have been reached by many scientific panels, public health organizations, and governmental bodies over the past 40 years. For example, in 2018 the Radiation Advisory Committee of Australia concluded that: "there is no substantive evidence to conclude that exposure to normally encountered environmental levels of power frequency electromagnetic fields causes adverse health effects in humans"

Finally, you requested that PECO relocate its lines away from their existing location. As you know for our conversations together with PECO's real estate representative, PECO's lines have been at this location for decades and, regardless of whether easement or right-of-way documentation from many decades ago can be located, over time PECO has developed a property right, known as a "prescriptive easement" that provides it with a continuing right to locate and operate its distribution lines at their current location.

The electric distribution line along your property provides utility service to your residence and 15 of your neighbors' houses, with no other apparent way of providing service to those residences. PECO can investigate alternative methods of providing service to those residences, but understand that you would have to pay the cost of relocating PECO's facilities. If you would like to pursue that option, PECO can do a high-level estimate of the cost of a relocation. At that point, we would need a non-refundable deposit of 10% of the estimated cost, which we would use to fund detailed design work and provide a final cost estimate to you. At that time, you would decide whether to fund and proceed with the alternative service. Let me know if you would like to proceed with a relocation analysis and I can provide the high-level estimate to start the process.

Stephen Reilly

New Business Engineer

610 648 7717 (o)

215 495 7750 (c)

4/8/2019

exhibit 6  
1 of 2

9/10/20, 8:06 PM

**Fwd: 630 Morris Ave**

valerie levesque <valerielevesque24@hotmail.com>

Wed 11/20/2019 11:42 PM

To: Christopher Watson <cwatson@cofactorgroup.com>

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1 attachments (439 KB)

EMF Science Reviews 1977-2018.pdf;

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Sent from my iPhone

Begin forwarded message:

**From:** "Smith, Ward L:(PECO)" <ward.smith@exeloncorp.com>  
**Date:** November 20, 2019 at 3:22:33 PM EST  
**To:** valerie levesque <valerielevesque24@hotmail.com>  
**Subject: RE: 630 Morris Ave**

Ms. Watson:

Thanks for your patience.

As you know, while PECO's view is that it has property rights to keep its line where it is, I agreed to try to solve the engineering puzzle: if PECO were to de-energize and remove the line that crosses your property, how would it continue to provide service to your neighbors who currently take service from that rear property pole line?

When Steve and I walked the line in October we found that, while there are poles going all the way through to the next street, there is a gap of a few poles which do not have conductors for PECO's "primary voltage" service (those poles appear to have communication wires and secondary electric wires). Therefore, we cannot merely reverse the flow of electricity and serve from the other end. Instead, we would need to do construction work from the other end to install new primary service conductors and close the primary conductor gap.

That is where the costs begin to accumulate rapidly. We believe that the poles that do not have primary cable on them would need to be replaced with new poles that have the ability to carry the weight of the primary cable. That would also require tree trimming work in those yards. In addition, we don't believe that we could or should get authorization to build new poles down a portion of the block, but leave the old poles for the remainder. So, if we go to build out the rear property pole line, we think we are talking about rebuilding the entire block of rear-property service.

The good news is that our high level estimate is less than Steve originally anticipated. The bad news is that we still estimate the cost will be very substantial – approximately \$400,000. And, as noted, this would involve construction across all of your neighbors' properties.

I realize that asking you to bear that cost would make your project a non-starter, so I'm trying to see if there is a way to apply PECO funds to the project. PECO spends its capital according to a complex prioritization that is intended to maximize the overall reliability of the distribution system. Reducing that complexity as much as possible the overarching decision rule is that, since capital is by definition always a limited resource, in any given year we work first on the lines that have low reliability and serve large amounts of customers. I've asked for an analysis to be done of the condition and reliability statistics of the rear-property pole line on your block, to see where it sits in the overall reliability queue and thus when we could expect to see reliability-driven construction. I do not have an estimate of how long that review will take.

While that is happening, I wanted to share some additional information regarding your EMF concerns. I keep track of EMF science reviews by scientific panels, public health organizations, and governmental bodies. I know that, when you first raised EMF concerns, we provided you with the then-most-recent such review, which was from the Radiation Advisory Committee of the State of Victoria, Australia. You later indicated that the Australian review had not given you comfort. I therefore thought you might find it useful to look at the larger list of such EMF science reviews, which I've attached.

I wish I had a solution in hand, but I think you can see the difficulties involved in getting to that eureka.

Ward Smith

**From:** valerie levesque <valerielevesque24@hotmail.com>  
**Sent:** Wednesday, November 20, 2019 9:59 AM  
**To:** Smith, Ward L:(PECO) <ward.smith@exeloncorp.com>  
**Subject:** [EXTERNAL] Fwd: 630 Morris Ave

Mr. Smith,

Hi I got your automatic email that you were out of the office until Nov 12, but have you had the chance to look into my email below. Please keep me posted.

Thank you,  
Valerie Watson

Sent from my iPhone

Begin forwarded message:

**From:** valerie levesque <valerielevesque24@hotmail.com>  
**Date:** November 12, 2019 at 1:47:24 PM EST  
**To:** "Smith, Ward L:(PECO)" <ward.smith@exeloncorp.com>  
**Subject:** 630 Morris Ave

RECEIVED

**Fw: Re: 630 Morris Ave lack of easement**

valerie levesque &lt;valerielevesque24@hotmail.com&gt;

Mon 6/22/2020 3:02 PM

To: Smith, Ward L:(PECO) &lt;ward.smith@exeloncorp.com&gt;

SEP 11 2020

PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

Mr. Smith,

Hi.. I want to touch base with you again since I never heard back from you on my last email below. Verizon removed its last wire on property a month ago. So with Verizon and Comcast officially gone on property that now only leave PECO standing in the way of our project. When Verizon took out its wires an engineer said they could not vouch for the integrity of the poles and high voltage electrical wires. As mentioned in a previous email to you, Verizon was concerned about the change of tension on the poles and electric wires once they removed theirs. Now that it has happened I want to make PECO aware of that concern given the proximity your wires have to our home as well as our neighbors and the neglect of those wires, abandonment and deterioration over the years.

My neighbor called PECO last week about a light flickering issue we have had over the years in both homes. One of your workers came over to check out the situation and said someone from PECO would be coming back over the look into the matter further. Since there is no easement, I would like to please be made aware of any and all work that might need to be done to this line with regards to that matter.

I appreciate your time and want to get to the bottom on this matter. As you know it has been well over a year since this situation was brought to PECO's attention with no resolution to date. Please see below the email I send you May 29th about a possible reroute of the line, that I believe would cause the least amount of disturbance on your end and ours.

Thank you again for your time.

Regards,

Valerie Watson

630 Morris Ave

Bryn Mawr, PA 19010

610 733 4004

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**From:** valerie levesque <valerielevesque24@hotmail.com>**Sent:** Friday, May 29, 2020 2:53 PM**To:** Smith, Ward L:(PECO) <ward.smith@exeloncorp.com>**Subject:** Fw: Re: 630 Morris Ave

Mr. Smith,

Thank you for your email. Yes lets please continue the conversation via email. At the far end of my property where my neighbor's property starts is a PECO pole at 603 Woodleave Road, Bryn Mawr. There is a picture of this pole below. I believe that if PECO was able to get the power you need to that pole you would be able to continue your route with little disruption to the existing line. I would try and send you an aerial picture, but any shots will only be obstructed by trees. You can see utility lines coming off low on that line to the left so

Exhibit 8

RECEIVED

SEP 11 2020

PAID BY THE PUBLIC UTILITIES COMMISSION  
SAVING FOR YOU



BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Christopher and Valerie Watson

Docket No. C-2020-3021127

v.

PECO Energy Company

RECEIVED

SEP 11 2020

PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

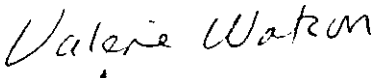

CERTIFICATE OF SERVICE

We, Christopher and Valerie A. Watson, hereby certify that I served a copy of the Response to PECO's Preliminary Objections on Ward L. Smith and Khadijah Scott, via email to:

ward.Smith@exeloncorp.com

khadijah.Scott@exeloncorp.com

Dated September 11, 2020

/s/ Valerie Watson   
/s/ Christopher Watson 

Christopher and Valerie Watson

630 Morris Ave

Bryn Mawr, PA 19010

610.733.4004

valerielevesque24@hotmail.com

Valerie Watson  
630 Morris Ave  
Bryn Mawr, PA  
19010

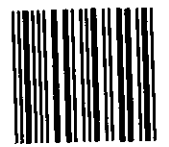
PLACE STICKER AT TOP OF ENVELOPE TO THE RIGHT  
OF THE RETURN ADDRESS. FOLD AT DOTTED LINE  
**CERTIFIED MAIL**



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Rosemary Chiavetta Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street, 2nd Floor  
Harrisburg, PA 17120