

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

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Tuesday, 29 September 2020

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

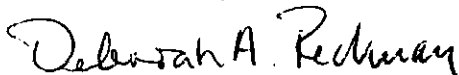
(rchiavetta@pa.gov)

RE: Docket No. C-2019-301 3582, *Redman v. FirstEnergy, Penelec, & CEO Jones*  
Submitted for filing – Complainant’s Supplement to Emergency Motion to Compel  
by Sept. 25

Dear Secretary Chiavetta,

Attached for filing is a copy of Complainant’s Supplement to Emergency Motion to Compel Respondents to Cut Down Dying, Leaning Tree and Remove Pile of Branches Left in the Lawn in October 2018 That Has Been Cited by the City as a Blight by September 25. This is urgent and is being sent via e-mail (because Complainant’s computer will not allow her to use the e-filing service) and via U.S. mail. If it is not acceptable, Complainant asks that she be informed that it has been rejected for filing.

Yours sincerely,



Dr. Deborah A. Redman

Encl. (6-page Supplement to Motion to Compel)  
cc: Attorney Margaret A. Morris (mmorris@regerlaw.com)

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OCT - 8 2020

PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

**BEFORE THE  
PA PUBLIC UTILITY COMMISSION**

DEBORAH A. REDMAN,

Complainant

V.

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

Respondents

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No. C-2019-3013582

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OCT 8 2020

PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

**Tuesday, 29 September 2020**  
(Via e-mail and U.S. mail)

**SUPPLEMENT TO EMERGENCY MOTION TO COMPEL RESPONDENTS  
TO CUT DOWN DYING, LEANING TREE AND REMOVE PILE OF  
BRANCHES LEFT IN THE LAWN IN OCTOBER 2018 THAT HAS BEEN  
CITED BY THE CITY AS BLIGHT BY SEPTEMBER 25**

Comes now Complainant Dr. Deborah A. Redman and supplements her September 21 Emergency Motion to Compel Respondents FirstEnergy/Penelec to (1) cut down the dying, leaning tree on 414 Park Avenue, Meadville, near the power line because it poses a serious danger to anyone using the sidewalk and (2) remove the pile of branches it left in the lawn in October 2018 when they started cutting down the dying tree and were stopped by heavy rain because it has been cited by the city of Meadville as blight. As the situation has grown hazardous, these supplements are necessary and urgent.

*I. Attorney Morris has deemed Complainant Redman's submissions "unacceptable" because the pro se Complainant, who is unable to exactly follow the rules and regulations, did not follow procedural guidelines to a tee.*

On 21 September, Dr. Redman sent her Emergency Motion to Compel to the Commission via e-mail. In a 22 September e-mail, Attorney Morris for the power companies notified Dr. Redman that the motion was not officially filed because e-mailed submissions are only acceptable when there is confidential or proprietary information involved, concluding that “these attached submissions are not acceptable.” She added that during the pandemic all parties are required to “open and use an e-filing account free of charge through the Commission’s website.” As another option, she mentions that Dr. Redman could also send “submissions by overnight delivery to the office address,” warning that the Commission only receives mail twice a week.”

*First*, as Dr. Redman stated in earlier pleadings, her computer has stringent security restrictions on it so it will not allow her to use many e-filing programs.

*Second*, disabled Complainant Redman also stated in earlier pleadings that she is unable to keep up with this process, learn all the rules and regulations associated with proceedings and thus needs appointed counsel. Dr. Redman fully admits she has been unable to keep up with changing procedures involving the COVID-19 pandemic.

*Third*, Dr. Redman cannot afford overnight delivery, roughly \$30. She has lost to date 15 months of income due to the circumstances of this case and to the hundreds of hours spent complaining to the power companies and the Public Utilities Commission (also referred to as PUC or the Commission). At this point, she is endangered financially and truly fears she may not survive. The Commission, the public utilities staff and its

lawyers are all being paid while engaging in this quasilegal process. If they lost well over a year's pay, they would understand that overnighting is not a good option.

*Fourth*, it makes no sense to send the Emergency Motion to Compel in paper format because the attachment containing Attorney Morris's photos with comments on them are not legible when printed out. The red and yellow comments can only be read online.

*All these types of problems are a reason for her requesting appointed counsel. Dr. Redman has in the past requested appointment of counsel due to disability and renews that request here on procedural and disability grounds.*

***II. Compensation for unpaid rent increases***

The second reason to supplement the Motion to Compel is to add to the relief section. The Commission should order Respondents to compensate Dr. Redman for the rent increases that she has not paid her landlord because her toilets have been clogged due to the power companies' refusal to remove the dying, leaning tree near the lines (also referred to as the wisteria tree), a main source of clogs. The total additional rent will be **\$1,000** through the end of the year and it should be paid immediately. The relief given in the Motion to Compel should thus read as given below.

***III. Compensation to have Dr. Redman see that the wisteria and vegetation around it is removed and the boundary between 404 and 414 Park Avenue and the***

*forsythia hedge along the sidewalk near 414 Park Avenue re-established .*

The current state of what is left of the dying wisteria tree is that it poses a serious hazard to anyone on the sidewalk or in the lawn around the tree. The power companies commanded by Attorney Morris refuse to remove the tree or trim it back. Recently, the family at 404 Park Avenue told Dr. Redman that they have complained about the tree multiple times, to no avail. Apparently Penelec and FirstEnergy find it perfectly acceptable for people to get harmed or electrocuted due to their actions and inactions. Because the resistance to do the right thing is so strong, Dr. Redman asks that she be compensated in the amount of **\$7,500** for seeing the that tree comes down, the rest of the vegetation removed, the corner along the sidewalk be freed of the huge wisteria roots, and the hedge and boundary between the two properties be re-established by planting holly and rhododendrons. Dr. Redman got an estimate to remove the wisteria tree, almost \$1,000. Renting a backhoe for just one day costs on average \$150-\$500 and it is unknown how long would be needed to remove roots as large as a forearm. (The developer at 404 Park Avenue ran an excavator for several months and still could not get out all the roots.) Good screen plants are not cheap. Due to fact that cold weather will soon be on us and the plants need to establish themselves before that, this needs to be done immediately.

WHEREFORE, Complainant Redman moves the Commission to order the


Respondents to

- (a-1) pay Complainant **\$1,000** to see that the dying, leaning tree and all smaller vegetation near it is removed
- (a-2) have FirstEnergy remove the pile of branches they left in October 2018 that the city has cited as a blight (or agree to pay Dr. Redman's bill)
- (a-3) pay Complainant **\$6,500** for seeing that the sidewalk area near the wisteria tree be freed of the huge wisteria roots and the hedge row and boundary between the two properties be re-established by planting screen plants such as holly and rhododendrons

**by Friday, October 2**

- (b) compensate Dr. Redman for her costs to date to unclog the toilets in the amount of **\$500** (for Green Gobbler and other drain cleaners) **by Friday, October 2**
- (c) compensate Dr. Redman in the amount of **\$160** for 40 lawn refuse bags (she has filled over 30, but bought 40 to date) that she has filled with the debris caused by the wisteria **by Friday, October 2**
- (d) compensate Dr. Redman for the unpaid rent (rent increases during the years this matter has not been addressed by FirstEnergy/Penelec), amounting to **\$1,000**.

Yours respectfully,



Dr. Deborah A. Redman

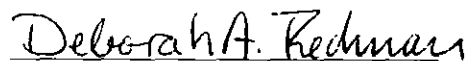
414 Park Ave.

Meadville, PA 16335

Tel: 814-853-3770

**Tuesday, 29 September 2020**

**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

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**CERTIFICATE OF SERVICE**

I hereby certify that on this 29th day of September 2020 I served a copy of this Motion to Compel on the following by e-mailing a copy to

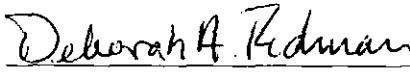
Attorney Margaret A. Morris  
Reger Rizzo Darnall  
Cira Centre, 13<sup>th</sup> Fl.,  
2929 Arch St.  
Philadelphia, PA 19104

(Via e-mail only unless request for copy  
is made)

and by e-mailing and sending via U.S. mail, postage paid, to

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

(Via e-mail and U.S. mail)



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PITTSBURGH PA 150

29 SEP 2020 PM 5



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SECRETARY'S OFFICE

Rosemary Chiavetta, Secretary  
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400 North St.  
Keystone Bldg.  
Harrisburg, PA 17120

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