

Alexander von Koch
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December 16, 2021

Rosemary Chiavetti, Secretary
Commonwealth of Pennsylvania
Pennsylvania Utility Commission
400 North Street
Harrisburg, PA 17105-3265
RA-PCAppeals@pa.gov

DATE OF DEPOSIT

DEC 18 2021

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

Khadijah Scott, Esq.
Assistant General Counsel, Exelon
Counsel for PECO Energy Company
2301 Market Street, S23-1
Philadelphia, PA 19103
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Re: Alexander von Koch v. PECO Energy Company
PUC Docket No. C-2021-3029826
E-filing Confirmation No.2330342; created 12/16/21

RESPONSE TO PECO ENERGY COMPANY

Dear Ms. Chiavetta:

Below is Alexander von Koch's response to the formal complaint filed in the above-referenced docket and responded to by PECO. I have enclosed a Certificate of Service showing that a copy of the above document was e-served on the interested parties. Thank you for your time and attention on this matter.

As indicated previously, the complainant, Alexander von Koch, suffered frequent and very costly damages over a 3-year period due to electric surges resulting from a serious design flaw in PECO's electrical delivery

system. The electric surges endangered and continue to endanger the welfare of the owners of and tenants on the property, as well as damaging utilities, electronics and appliances in the structures.

To recap, we purchased the property (consisting of three service addresses—1255, 1257 and 1259 Newark Road, Toughkenamon, PA—in 2017. The first serious PECO electric surge occurred on 24 July 2018. It caused extensive damage (nearly \$20,000) to all utilities, appliances and electronics in the three structures on the property.

The second electric surge occurred on 8 October 2019, again causing the similar extensive damage to property in all three structures. Following the first surge, we purchased and installed expensive entire house surge protectors for each structure, which should have prevented surges from entering electric panel boxes. They all burned out immediately, indicating the high voltage level entering those boxes.

The third surge incident occurred on 10 October 2021, which was even more violent. It caused one of **the electric meters to explode out of its casing and fly over 25 ft into the field**. This would have been deadly to anyone in the vicinity. Again, nearly everything electric or electronic in the three structures was destroyed.

The fourth and most recent incident occurred on 29 October 21, just 19 (!) days after the third incident, causing the same damage as all the other surges.

Other residents along Newark Road have also been affected to varying degrees, including considerable losses incurred by the New Garden Airport owned by New Garden Township.

PECO's response to the complaints of surge damage is always to deny responsibility, claiming that the incidents are an "Act of God", either from a tree or brush falling on power lines or a vehicle striking a pole. They claim they do not offer protection for property damage due to downed trees, traffic accidents, and the like. The company does not guarantee continuous, regular, and uninterrupted supply of service. **This is not the point.** None of the above is relevant to the issue at hand.

The actual cause of these incredibly dangerous and damaging surges is a serious design flaw in PECO's electrical delivery system, whereby the high voltage lines are mounted on poles above the service lines. Every time something strikes the high voltage lines anywhere along a several-mile stretch that causes the high voltage line to touch the service lines, it sends tremendous voltage through to the residential customers. It is simply unconscionable that PECO has been aware of this problem since at least 2018, and likely before, and still has not taken any action to remedy it. This callous lack of concern for public safety and loss of property is beyond irresponsible. Someone should not have to suffer a fatality for PECO to make necessary repairs.

When I last spoke to PECO, they indicated that they plan to make changes to remedy the problem in the second half of 2022. Why do we have to wait and hope that another incident does not occur over the next 6-12 months?

Our requested relief is to **immediately** make necessary repairs to prevent surges from entering our property and endangering the lives and welfare of persons on the property, whether that requires line changes, pole surge protectors, etc. Our second request is monetary relief for the damages we suffered over the past 3 years.

As a property owner, I have pursued all available avenues of prevention. I have contacted the responsible utility (PECO) to review their electrical supply lines. I have paid for electricians to check the electrical system in all three buildings, and purchased and had them install full house surge protectors prior to each electric panel. I have conversed with PECO employees concerning lightning arresters, line surge protectors and installation of "reclosers" so that I understand what PECO can do to prevent future events.

PECO apparently has cut back vegetation and visually inspected the electric lines, but has failed to install any **surge protection mitigation measures** in a timely manner. PECO states it has a Long-Term Infrastructure Improvement Plan ("LTIIIP") to retire the current 4kV circuit. The existing low voltage electric distribution circuit will be upgraded to a higher voltage, 34kV. The LTIIIP project began in July 2021 and includes upgrading and installing new equipment, including poles, aerial wires and tree trimming. New aerial devices (reclosers) will also be installed to stop the flow of electricity on the line and automatically restore electricity where

possible. LTIP is expected to be completed in the third quarter (Q3) of 2022. This acknowledges that they have been aware of the problem for some time and yet have not taken timely interim measures to prevent further damage to customers and their property.

As soon as the 1st surge incident was reported on 24 July 2018, PECO should have reviewed the electrical service lines and their impact on our and neighboring properties. The upgrades indicated above should have been initiated and particularly "reclosers" installed which could have prevented the reoccurring surges (at least 15 since 2018) and therefore mitigated the dangers caused to occupants and prevented the extensive losses.

We contend that PECO is responsible for losses that have occurred due to their abject negligence and particularly since these incidents could have been prevented had they taken timely action.

CERTIFICATE OF SERVICE

I, Alexander von Koch, hereby certify that I have this day served a copy of the complainants answer to PECO Energy Company's Answer in the above matter upon all interested parties by E-mailing a copy to:

KHADIJAH SCOTT
Counsel for PECO Energy Company 2301 Market Street, S23-1
Philadelphia, PA 19103

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*Ms Rosemary Chiaretti
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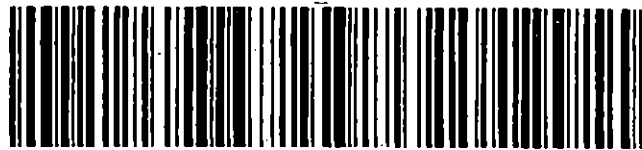
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