

IN THE COMMONWEALTH OF PENNSYLVANIA, PUBLIC UTILITY COMMISSION

Antonio Geatti

v.

PPL Electric Utilities Corporation

Docket No. C-2023-3043427

**MOTION TO FILE EXEPTIONS TO ALJ TENTATIVE INITIAL ORDER FROM JANUARY 2, 2025**

To: **Secretary of the Commission Rosemary Chiavetta, and ALJ Alphonso Arnold III**

**PA Public Utility Commission**

Keystone Building

400 North Street

**INTRODUCTION C-2023-3043427**

This is the answer to the Initial Decision granting Summary Judgement. The complainant is requesting that the summary judgement is denied as the whole structure of the Defendants PPL Electric Utilities is based on fabrications and fraud and not facts or true documented statements backed by facts checking. In his observation the complainant has detected and verified that apparently PPL Electric does not do any facts checking before making outrageous statements. The complainant is urging the Commission to DENNY PPL Electric's Request for Summary Judgement. Also, Complainant is urging the Commission to have a trial hearing by Jury Trial instead of ALJ to get a fair hearing.

## HISTORY OF THE PROCEEDING

**Answer to comment/paragraph dated October 26, 2023** which shows the following discrepancies or exceptions; the Complainant has never seen what these alleged safety reasons were, PPL Electric, the Defendant has never given a list of reasons to be resolved to the Complainant. PPL Electric is only responsible to the handoff at the main circuit braker (The 200AMP Box) and the resident is responsible to verify the rest of the installation by contracting a certified electrician to inspect the facility. The Township does not have anything to do with that process. Columbia county did not contact the property owner to have the facility inspected, and Columbia County never contacted PPL to disconnect service, or to have safety inspection done by certified electrician. PPL Electric did not contact property owner to have facility certified by licensed electrician which obviously would have resolved the issue. Instead the Defendant concentrated on a plot to destroy the Complainant's home in order to dismiss the complaint filed against PPL Electric.

**Answer to comment/paragraph dated December 8 2023;** the demolition order referred to is a complete fabrication and smoke screen created by Magan Rulli and Brittany Bacon AKA Brittany Mary Stasic. These two figured that if they destroyed the house, they could get rid of the Complaint and created, or caused the creation of a fraudulent document which is what they call the demolition order, but that document has never played any role in the demolition of anything, additionally it does not have any authority, or jurisdiction, and does not come from any body of government in Columbia County, or any body of government at all. That document has never been used for any demolition, and you will not find any shred of evidence that it was ever used for anything other than make outrageous allegations that because of this "order" a home was destroyed. That "order" was not an "order" at all but rather a nefarious, corrupt, degenerate, iniquitous memorandum created by a third party in the conspiracy to destroy my home, but it lacks authority and jurisdiction as it does not even have a return address or any government signatures, and does not have any indication that it comes from a Columbia County Government Office. The only purpose for that Memo was to harass, and that it did, but it was never used for anything. No one will ever find a shred of evidence anywhere to the effect that the document was ever used in any way because none exists. Also, in Pennsylvania townships do not destroy people's homes. There is no such process in the books. There is not such law anywhere in PA. Additionally, what would they do with the people they leave homeless, and the taxes they will fail to collect. What they did was completely illegal and outside the norm, and PPL Electric became involved in that destructive approach to handling the Complaint that I filed.

**Answer to comment/paragraph dated March 26, 2024;** again, the demolition order was a scam, and it was never used for anything, and there is no record anywhere of any

demolition occurring because of it. Also, its contents are completely false, and the Complainant actually had a construction permit at the time even though a permit was not necessary or needed. Obviously if a construction permit had been granted, there would be no demolition scheduled. Additionally, the Complainant was never told of any demolition occurring on a certain date or for a certain reason. Instead, the Complainant had a valid construction permit. The complainant did not know of any open issues with the township or anyone else. The International Property Maintenance code has copyright protections and cannot be used in the way that was depicted on PPL Electric Exhibit 8. The publisher does not authorize its use in the way depicted by PPL Electric's Exhibit 8. The Complainant does not have access to the Administrative Court transcript, and does not necessarily agree with references which would be made to the court transcript as he cannot look at them or verify them.

**Answer to comment/paragraph dated November 6 2024;** PPL Electric claims that they cannot reconnect electric power to the property because they succeeded in destroying the house but that is not true as there are two power sources 200 feet apart on my property regardless of any destruction of the house. The property is still mine, it has not changed hands, and it is still my home and residence, I do not plan on moving. I still need electric power regardless of any other issue, and it is completely possible for PPL Electric to supply power to my property at 20 Shawnee road as I have two Electrical Supply Poles at two locations on my property already. PPL Electric would just have to re-energize the property to an approved receptacle certified by a licensed electrician.

**Answer to comment/paragraph dated November 18 2024;** the Complainant answered Motion via email which is the way we were instructed to do by the previous ALJ. This obligation to file motions with the Commission's Secretary is new to me. The previous ALJ took hour email responses without complaint. I had no knowledge at the time as to how to do that. The so called demolition order has no legal validity as it has not authority, no jurisdiction, no return address, no official signatures, practically all of the points it's trying to make are fabricated, but in addition it was never used for anything, so due to all those reasons that document is moot, irrelevant, and unusable for court purposes if for nothing else, at least for the fact that it was never used for anything, so it's not proof of anything and is not acceptable evidence to any claim. Now, it seems that PPL loves that document because they think it leaves them in the clear of any liability for their actions, but the fact is that the document was never used for any purpose from November 30<sup>th</sup> 2023 to now. That document is pure fabrications and fraudulent statements, and in addition it was never used for anything at all. It was just a harassment ploy that Magan Rulli and Brittany Bacon AKA Brittany Mary Stasic created to make noise and try to dismiss the PPL Electric Complaint case among other things.

**Answer to comment/paragraph dated December 16 2024;** the Complainants Motion To Keep Record Open and Continue Hearings Should be Granted, and PPL Electrics Summary Judgement should be denied for the following reasons:

**Answer to ALJ FINDINGS OF FACT ITEM NUMBER 4;** what safety reasons did PPL Electric have to shut of my electric power? PPL Electric has never answered why they shut of my power or what safety reasons they needed resolved, so that is completely false and fabricated. PPL Electric has never informed me, the Complainant of any safety reasons they alleged!

**Answer to ALJ FINDING OF FACT ITEM NUMBER 6;** Charles Stalega is not the Code Enforcement Officer for the Township. He is not a government officer or official at all. He does not even work in Columbia County at all or for any Government Agency of any kind in Columbia County. He is not a government agent anywhere, and much less in Columbia County as he works for a private construction contractor or contacting firm in Luzern and Lehigh Counties, not Columbia. Mr. Stalega is a civilian private citizen, with not more power than any other civilian. He has no legal privilege or ability to obtain search warrants. He is not an employee of either Columbia County or Scott Township and has never been. If he broke into my home, he did it under false pretenses, impersonating a public servant and committing a myriad of other crimes in the process. Impersonating a public servant, trespassing, criminal mischief, destruction of property, filing false reports to authorities and harassment are just a few of the crimes and they are in the Pennsylvania Crimes Code and carry fines and prison sentences.

**Answer to ALJ FINDING OF FACT ITEM NUMBER 7;** only a portion of the home was undergoing non-permit requiring renovations/remodeling and the plaster on the walls and ceiling had been purposely removed under insurance renovations, and there was no microbial growth. There was nothing rotten or falling or leaning, and the home's electricity worked perfectly as it was designed. There was no electrical issue with the home. There was no rampant rust or water exposure to receptacles, and even if a particular receptacle would have been damaged, it would have been easy to replace. Also, any homeowner may use their garage as they please, even for storage purposes and they do need permission from the authorities.

**Answer to ALJ FINDING OF FACT ITEM NUMBER 8;** This is completely false; the Township never issued any order or sent any communication to me. The document being referred to here as I explained in prior paragraphs was just complete fraud and a harassment ploy by Magan Rulli, and Brittany Bacon AKA Brittany Mary Stasic, among other things. They were trying to fabricated fraudulent evidence for the PPL Electric Complaint case among other things. It is evident that the comments made here are fraudulent. There was no imminent

danger of collapse, the garage was sitting concrete slab with double reinforced walls, and a brand new roof installed in November of 2023 and the home had a current and valid construction permit even though there was no requirement to obtain one. The permit was current and valid until the end of April 2024. The rest of the home other than the garage was sitting on steel I-BEEMS and had double reinforced walls, nothing was falling, or leaning, or structurally compromised in any way. There was nothing rotten or compromised in any way including microbial growth which was nonexistent. There was no framing or roof, or joist, or roof trusses issues at all and a report was produced by a licensed contractor and sent to Brittany Bacon and she did acknowledge receipt of the document stating that the home was structurally in perfect condition. The claims made on the Nov 30, 2023 fraudulent document are outrageous. The structure was not in any danger or collapse, had a new 100 year metal roof, concrete slab floor in the garage, with double reinforced walls. The rest of the house was sitting on a concrete foundation and steel I-BEEMS, nothing was sagging, leaning or rotten and the home was a 100 percent brick home. The home was a home and not a business, so there was evidently no danger to the public as it was not a gas station or a church or a post office. There was no danger to occupants as the home was undergoing cosmetic interior renovation and all precautions had been taken and I the Complainant was the only resident and occupant. There was no danger to adjacent buildings, as the home did not have any adjacent buildings. There was no danger to surrounding structures as the home did not have and does not have an surrounding structures. There was no emergency of any kind as the Home was in the best structural shape it had ever been in the past 40 years. There was a brand new metal roof installed on the home. The Livingroom, the family room, and the kitchen had brand new Legacy brand Flooring with a lifetime warranty.

**Answer to ALJ FINDING OF FACT ITEM NUMBER 9;** The fraudulent illegal demolition order does not say that the township would demolish the property, it just says that it would proceed with demolition process but no one knows what that is as a demolition process was never explained by anyone to anyone! What exactly is a demolition process? Does that mean that I demolish the property or does that mean that someone else demolishes the property. What is the process and who pays for it. Who prorates the taxes on the property?, what exactly is the process. This is just a mystery?. It also does not show any actions to be taken after March 15,2024. It just says that “on March 15, 2024” the whole process would take place, but it does not say “or after” as the ALJ judge indicated (see page 3 of Nov 30 2023 fraudulent demolition order, “IF THE ABOVE IS NOT COMPLIED WITH, SCOTT TOWNSHIP WILL PROCEED WITH DEMOLITION PROCESS ON MARCH 15,2024”) . With that having been clarified, the whole process (whatever that is, as no one knows), would have to have been completed on March 15, 2024, and at that time the complainant had a

valid, current construction permit until the end of April 2024. As far as the Complainant is concerned, PPL Electric has never answered or given an explanation as to why they disconnected the Complainants Electric Service on or around May 10th 2023, which is what is in question in this case. This case or complaint is not and was not opened about or in reference to any demolition anyway, but PPL Electric keeps bringing up the alleged demolition order from November 30<sup>th</sup> 2023 which in addition to being moot, invalid, illegal, and fraudulent, it was never used for anything other than harass the Complainant. The alleged order was never implemented or used in any way, and for that reason it is not valid, or acceptable proof of anything, and should not be used, and should be eliminated and disregarded as proof of any of PPL Electric's claims. There is no connection in between the November 30<sup>th</sup> 2023 demolition notice or order, and the destruction of the Complainants Home. They are two separate and distinct events that are not linked in any way. The Destruction of the Complainants Home occurred on a different dynamic which was unrelated to the November 30<sup>th</sup>, 2023 Notice. They are two different and distinct and unrelated events which PPL Electric is somehow trying to connect and sell the evidence as true and correct but they are different and unrelated events. The destruction did not occur because of the Notice, but PPL Electric apparently never did any facts checking before trying to sell that story to the Administrative Law Judge, and the Complainant. The notice is not valid evidence of anything due to many reasons already explained before, but it was also never used in any way in connection to the destruction of the home and those two things are unrelated events; in other words, there is no connection in between the Notice and the destruction of the home which occurred due to a different and unrelated dynamic. One thing does not have to do with the other. Additional hearings are necessary as the picture and the evidence that PPL Electric have created are based on baseless, inaccurate, fraudulent information which is not acceptable. In addition, it constituted filing false reports with authorities. Also, PPL Electric Utilities Corporation Edited and Modified the alleged demolition order notice from November 30<sup>th</sup>, 2023, which means that they were supplied an editable, non-pdf format document by Brittany Bacon AKA Brittany Mary Stasic so that they could modify the notice to PPL Electric's Utility Corporation convenience, which proves that they were conspiring and there was collusion in the destruction of the Complainant's home. Also, the proceedings and appeals and other needed activities were not completed when the ALS accepted the Defendants " Motion For Summary Judgement Appeal" because Obviously the Complainant did not have any chance to introduce his documents into evidence as the evidentiary meeting that should have happened on December 10 2023 was cancelled by ALJ Alphonso Arnold III, and that prevented the Complainant's evidentiary documents to be accepted into evidence, and that among other reasons makes the Defendant's submission of a Motion for Summary Judgement moot and inadmissible as a matter of Law.

**Answer to ALJ FINDING OF FACT ITEM NUMBER 10;** when did PPL Electric Utilities Corporation disconnect the Complainants Electric Service. Please reply with day, month, and year. Also, when did the request to disconnect service was received by PPL Electric Utilities Corporation? Please respond with a day month and year. Also, please explain how much time elapsed in between, and why? Also, please explain why PPL Electric Utilities Corporation Ignored the Call or calls made to PPL Electric Customer Service on the month of April 2023. Also please produce the document submitted to PPL Electric Customer Service or any other PPL electric department explaining why electric service was to be discontinued to 20 Shawnee Road 17815.

**Answer to ALJ FINDING OF FACT ITEM NUMBER 11 ,12 and 13; Obviously** these are not statements of fact. These are PPL Electric employees who draw a salary from PPL Electric and will say anything that PPL Electric tells them to say. Obviously, the service reconnection would have had a clearance from a licensed electrician or electricians who have the credentials to do electrical reconnections and there would not have been a safety issue. Also, which inhabitants are they talking about? The complainant is the only inhabitant, and there are no adjacent structures, or PPL Facilities next to the home.

**Answer to ALJ FINDING OF FACT ITEM NUMBER 14;** The paragraph beginning with “On August 5, 2024” may be misleading or inaccurate as the Complainant cannot verify that statement as being agreed on. There may be a discrepancy there.

### **Answer to DISCUSSION**

#### **Answers to Legal Standards**

The pleadings were not closed. The Complainant did not get any chance to introduce his evidence for the record as ALJ cancelled the evidentiary hearing scheduled December 10<sup>th</sup> 2024, and there is genuine issue as to the material facts, for many reasons including the fact that PPL Electric introduced non factual facts, numerous fabrications, also, PPL Electric knowingly and willingly accepted inaccurate, fraudulent, corrupt information and documents from third parties in order to win the case. PPL Electric is responsible for doing fact checking before introducing evidence as facts. They can't just have third parties produce corrupt, fraudulent information at their convenience to win the case, and then claim ignorance if their claim failed. Obviously, the issues as to material facts are still in dispute and the hearings should continue and as a matter of law, the Motion for Summary Judgement submitted by PPL Electric should be denied, and the hearings should continue, including the evidentiary hearing which was cancelled by ALJ Alphonso Arnold III. What could possibly prevent the Defendant from restoring electric power to the service address, the complainant owns the property, and it is home, and there are two electrical utility poles

on his property. How could PPL Electric possibly claim that they are technologically unable to restore power and re-energize the property. That is just absurd, and not true. That is what is called being facetious on PPL's part. Obviously, the Complainant still needs electric power for all the reasons he needed power before; why would PPL Electric not restore the Complainant's electric power?

The Complainant is officially filing/upgrading the complaint to include and contain the additional claims that the complainant has made, and yes, the commission has the authority and jurisdiction to address these complaints, as the Defendant has provided false, corrupt, fabricated evidentiary displays knowingly and willingly, which constitutes making false reports to authorities! The commission has a duty to make sure that the evidence that is introduced by any party is true and correct, and legal, and not just voluntarily and willingly accept false, fraudulent, corrupt, inaccurate, fabricated, illegal information, and evidence just for the sake of closing cases regardless of the harm and destruction being done to the public.

Mr. Stalega is not a government official anywhere including Columbia County. The evidence and exhibits provided by PPL Electric were never used for anything, aside from the fact they are invalid anyway. For those reasons the exhibits provided by PPL Electric are invalid and their Motion for Summary Judgement should be denied. The home did not have the defects that were claimed. It was not in danger or collapse, there were not any adjacent buildings or surrounding structures, there was no public or pedestrian traffic, and the Complainant was the resident as this was not an apartment building, there was no danger to the occupants. There are many factual issues in dispute.

#### **Answer to the CONCLUSION SECTION**

There numerous material facts in dispute and PPL Electric is not entitled to close the case with their motion for summary Judgement, and it should be dismissed. Complainant Motion to keep the record open should be granted as a matter of Law.

**Answer to CONCLUSION OF LAW NUMBER 1 ;** The Commissions Regulations permit parties to file motions for summary judgement. Answer, but it does not have to be granted.

**Answer to CONCLUSION OF LAW NUMBER 2 ;** All applicable pleadings and proceedings were not completed, and the evidentiary hearing was cancelled, leaving the complainant unable to submit his evidence into the record. There are genuine issues of material facts.

**Answer to CONCLUSION OF LAW NUMBER 3 ;** There are numerous factual disputes.

**Answer to CONCLUSION OF LAW NUMBER 4 ;** The complainant urges the Commission to keep the case open as the hearings are necessary in the public interest.

**Answer to CONCLUSION OF LAW NUMBER 5 ;** PPL electric should be able to re-energize the property safely. They have the technology and the know-how.

**Answer to CONCLUSION OF LAW NUMBER 6 ;** There are material fact in dispute in this proceeding and PPL is not entitled to judgement as a matter of law and the motion for summary judgement from PPL Electric should be denied. The Complainant's motion to continue with case open and record open should be granted.

**Answer to ORDERs By ALJ Alphonso Arnold III On C-2023-3043427**

**Answer to order Item number 1 ;** The complainant urges the Commission to please keep the record open and continue with hearings.

**Answer to order Item number 2 ;** The Complainant urges the Commission to please dismiss the motion for summary judgement as denied

**Answer to order Item number 3 ;** Thank you.

**Answer to order Item number 4 ;** The Complainant urges the commission not to dismiss the complaint, and especially not with prejudice as there are valid differences of material fact, and the public interest is better served continuing with the case and the record open.

**Answer to order Item number 5 ;** The Complainant urges the Commission to keep case C-2023-3043427 open in the public's interest and everyone else's interest, including the Commission, and the Public.

Sincerely,

Antonio Geatti 01/20/2025

Antonio Geatti Pro Se, Complainant