
Nicholas A. Stobbe

nstobbe@postschell.com
717-612-6033 Direct
717-731-1985 Direct Fax
File # 205250

February 12, 2025

VIA ELECTRONIC FILING

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor North
P.O. Box 3265
Harrisburg, PA 17105-3265

Re: Nieves Abad v. PPL Electric Utilities Corporation
Docket No. C-2024-3047163

Dear Secretary Chiavetta:

Attached for filing is PPL Electric's Answer to the February 7, 2025, Motion Compel of Nieves Abad in the above-referenced proceeding. Copies will be provided as indicated on the Certificate of Service.

Respectfully submitted,



Nicholas A. Stobbe

NAS/dmc
Attachments

cc: The Honorable Alphonso Arnold III (*w/attachments*)
Certificate of Service

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been served upon the following persons, in the manner indicated, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

VIA EMAIL AND FIRST-CLASS MAIL

Nieves Abad
747 Delaware Street
Forest City, PA 18421
Martjua3@aol.com

Date: February 12, 2025



Nicholas A. Stobbe

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Nieves Abad,	:	
	:	
Complainant,	:	
	:	
v.	:	Docket No. C-2024-3047163
	:	
PPL Electric Utilities Corporation,	:	
	:	
Respondent.	:	

**ANSWER OF PPL ELECTRIC UTILITIES CORPORATION TO THE
FEBURARY 7, 2025, MOTION OF NIEVES ABAD TO
COMPEL ANSWERS TO DISCOVERY**

TO ADMINISTRATIVE LAW JUDGE ALPHONSO ARNOLD III:

Pursuant to 52 Pa. Code § 5.342(g)(1), PPL Electric Utilities Corporation (“PPL Electric” or the “Company”) hereby files this Answer to Nieves Abad’s (“Complainant”) February 7, 2025, Motion to Compel Discovery, Sets III (“Motion to Compel” or “Motion”). As explained herein, Administrative Law Judge Alphonso Arnold III (the “ALJ”) should deny the Complainant’s latest Motion. PPL Electric properly objected to all of the requests contained in the Complainant’s Written Depositions (“Complainant’s Depositions”) subject to the Motion, which were levied upon PPL Electric and directed at specific current and former PPL Electric employees. With respect to the written Set V Interrogatories directed at Tom Kernoschak, PPL Electric is continuing to prepare responses and documents related to the same. These responses have been delayed due to the sheer number of discovery requests and related motions made by the Complainant throughout this proceeding.

The Company's Objections to the Complainant's Written Depositions – as sought through the Motion – are attached hereto as **Appendices A¹** and **B²** and are incorporated herein by reference.

PPL Electric renews and stands by all of its Objections previously served on the Complainant on January 31, 2025, and February 7, 2025. PPL Electric notes that it intends to file a Motion for Protective Order in this proceeding to limit the Complainant's continued service of excessive, irrelevant, and duplicative discovery requests upon the Company, which the Company believes is being sought in bad faith by the Complainant, and in an effort to unreasonable annoy, burden, and expense PPL Electric. 52 Pa. Code § 5.361. Additionally, the Company notes that it intends on filing Preliminary Objections to the Amended Complaint filed by the Complainant on January 31, 2025. The ALJ's determination of those Preliminary Objections may ultimately affect relevancy determinations on objected-to discovery requests, both now and going forward in this proceeding.

In support of its Answer, PPL Electric states as follows:

I. INTRODUCTION

1. On November 26, 2024, the Complainant propounded Set V Interrogatories directed at Tom Kernoschak upon PPL Electric.

2. On January 21, 2025, the Complainant served certain of the Complainant's Depositions on PPL Electric via email and certified mail.

3. These depositions were directed at Tom Kernoschak, Daniel Walker, Tim Roberts, Bill Farber, and John Rosato (collectively, the "January 21, 2025 Depositions").

¹ These objections are to the Complainant's Written Depositions directed at Tom Kernoschak, Daniel Walker, Tim Roberts, Bill Farber, and John Rosato.

² These objections are to the Complainant's Written Deposition directed at Michael Shaffer.

4. On January 31, 2025, PPL Electric timely objected to the entirety of the January 21, 2025 Depositions.

5. As noted, *supra*, those Objections are appended hereto as **Appendix A** and incorporated and renewed as though fully set forth herein.

6. On January 28, 2025, the Complainant served a Written Deposition directed at Michael Shaffer (“Shaffer Deposition”) on PPL Electric via email and certified mail.

7. On February 7, 2025, the Company objected to the entirety of the Shaffer Deposition.

8. As noted, *supra*, the Company’s Objections to the Shaffer Deposition are appended hereto as **Appendix B**.

9. On February 7, 2025, the Complainant served the Motion, seeking to compel responses to the January 21, 2025 Depositions, the Shaffer Deposition, and the Kernoschak Set V Interrogatories.

10. Under 52 Pa. Code § 5.321(c), a party is entitled to obtain discovery of any matter not privileged that is relevant to the pending proceeding, or any matter that is reasonably calculated to lead to the discovery of admissible evidence. *Id.*

11. As noted by the Superior Court of Pennsylvania, “While discovery should be liberally allowed, ‘fishing expeditions’ are not to be countenanced under the guise of discovery.” *Land v. State Farm Mutual Ins. Co.*, 600 A.2d 605, 608 (Pa. Super. 1991) (emphasis added).

12. “[T]he standard for discovery is relevance, not curiosity.” *Pa. PUC v. Pennsylvania-American Water Co.*, Docket Nos. R-2011-2232243, *et al.*, at 22 (July 21, 2011) (Order on Motion to Compel).

13. For the reasons stated in more detail below and throughout **Appendices A and B**, PPL Electric respectfully requests that the ALJ deny the Complainant's Motion because the information subject to these written depositions is sought in bad faith by the Complainant, and in an effort to unreasonable annoy, burden, and expense PPL Electric, in addition to the reasons set forth in the Company's Objections appended hereto as **Appendices A and B**. 52 Pa. Code § 5.361.

II. COMPLAINANTS' LATEST MOTION TO COMPEL RESPONSES TO WRITTEN DEPOSITIONS SHOULD BE DENIED

A. RESPONSE TO REQUEST FOR INTERROGATORIES SET V – TOM KERNOSCHAK

14. PPL Electric is currently working to prepare answers to question Nos. 1 through 86 and will serve them upon the Complainant when available.

15. Due to the volume and number of discovery requests and related motions served and/or filed by the Complainant, PPL Electric has been delayed in answering the Set V interrogatories directed at Mr. Kernoschak.

16. PPL Electric is employing good faith efforts to answer each unobjected to response as quickly as possible.

B. OBJECTIONS TO REQUESTS FOR WRITTEN DEPOSITIONS – TOM KERNOSCHAK, DANIEL WALKER, TIM ROBERTS, BILL FARBER, AND JOHN ROSATO

17. The Complainant's January 21, 2025 Depositions were served upon the Company on January 21, 2025, and properly objected to on January 31, 2025. The Objections to the same are attached hereto as **Appendix A** and will not be restated in full here.

18. The Company objected to the entirety of the Complainant's January 21, 2025 Depositions on the basis that they were not relevant, vague, overly broad, unduly burdensome,

duplicative, and an improper use of discovery not likely to lead to the discovery of admissible evidence.

19. Moreover, PPL Electric objected to the January 21, 2025 Depositions on the grounds that they are designed to unreasonably annoy, harass, and cause unreasonable expense and burden for the Company and, therefore, sought in bad faith. 52 Pa. Code § 5.361(a).

20. The Objections to the January 21, 2025 Depositions are attached hereto as **Appendix A**.

21. PPL Electric renews these Objections as these requests are not relevant, vague, overly broad, unduly burdensome, duplicative, an improper use of discovery, and/or not reasonably calculated to lead to the discovery of admissible evidence. Further, they are sought in bad faith, are designed to cause unreasonable annoyance and to unreasonably harass, and designed to unreasonably burden and expense the Company.

22. PPL Electric submits that its Objections to these requests should be sustained for the reasons set forth in the Objections themselves. *See Appendix A*.

C. OBJECTIONS TO REQUESTS FOR WRITTEN DEPOSITION – MICHAEL SHAFFER

23. The Shaffer Deposition was served upon the Company on January 28, 2025.

24. PPL Electric timely filed Objections to the entirety of the Shaffer Deposition on February 7, 2025. The Objections are attached hereto as **Appendix B**.

25. PPL Electric renews these Objections as these requests are not relevant, vague, overly broad, unduly burdensome, duplicative, an improper use of discovery, and/or not reasonably calculated to lead to the discovery of admissible evidence. Further, they are sought in

bad faith, are designed to cause unreasonable annoyance and to unreasonably harass, and designed to unreasonably burden and expense the Company.

26. PPL Electric renews these Objections through this Answer. PPL Electric submits that its Objections to these requests should be sustained for the reasons set forth in the Objections themselves. *See Appendix B.*

III. CONCLUSION

For the reasons set forth above, PPL Electric Utilities Corporation respectfully requests that Administrative Law Judge Alphonso Arnold III deny Nieves Abad's Motion to Compel Discovery for the reasons set forth above.

Respectfully submitted,



Kimberly A. Klock (ID # 89716)
Michael J. Shafer (ID # 205681)
PPL Services Corporation
645 Hamilton Street, Suite 700
Allentown, PA 18101
Phone: 610-774-2599
Fax: 610-774-4102
E-mail: kklock@pplweb.com
mjshafer@pplweb.com

Nicholas A. Stobbe (ID #329583)
Post & Schell, P.C.
17 North Second Street, 12th Floor
Harrisburg, PA 17101-1601
Phone: 717-731-1970
Email: nstobbe@postschell.com

Devin T. Ryan (ID # 316602)
Post & Schell, P.C.
One Oxford Centre
310 Grant Street, Suite 3010
Pittsburgh, PA 15219
Phone: 717-612-6052
E-mail: dryan@postschell.com

Peter J. Kramer (ID # 331797)
Post & Schell, P.C.
Three Logan Square
1717 Arch Street
24th Floor
Philadelphia, PA 19103
Phone: 215-587-1075
Email: pkramer@postschell.com

Dated: February 12, 2025

Attorneys for PPL Electric Utilities Corporation

APPENDIX A

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Nieves Abad,	:	
	:	
Complainant,	:	
	:	
v.	:	Docket No. C-2024-3047163
	:	
PPL Electric Utilities Corporation,	:	
	:	
Respondent.	:	

**OBJECTIONS OF PPL ELECTRIC UTILITIES CORPORATION TO THE
REQUEST FOR WRITTEN DEPOSITIONS OF NIEVES ABAD**

Pursuant to 52 Pa. Code § 5.342(c), PPL Electric Utilities Corporation (“PPL Electric” or the “Company”), by and through its attorneys, hereby serves these objections to the requests for written depositions of Nieves Abad (“Complainant”) served on January 21, 2025, via email.

On January 21, 2025, the Complainant served four (4) additional sets of requests for written depositions directed at certain current and former PPL Electric employees, namely, Tom Kernoschak (“Kernoshak Set V”), Daniel Walker (“Walker Set V”), Tim Roberts (“Roberts Set II”), Bill Farber (“Farber Set II”), and John Rosato (“Rosato Set II”). Collectively, PPL Electric will refer to these sets as the “January 21, 2025, Depositions.”

As explained below, PPL Electric objects to the entirety the January 21, 2025, Depositions as they are not relevant, vague, overly broad, unduly burdensome, duplicative, and an improper bad-faith use of discovery not likely to lead to the discovery of admissible evidence. Furthermore, PPL Electric submits that these requests are designed to unreasonably annoy, harass, and caused unreasonable expense and burden on the part of PPL Electric.

Importantly, the Complainant has now served upon PPL Electric more than 20 sets of discovery in the form of interrogatories, requests for production of documents, and written depositions. Many of these sets of discovery have consisted of a large volume of questions – some more than 100 individual requests – and many of which containing multiple subparts. PPL Electric generally objects to the Complainant’s continued abuse of the discovery process in this matter as the Complainant is continuing to seek discovery or depositions that are: (1) sought in bad faith; (2) designed to cause unreasonable annoyance and to unreasonably harass; and (3) designed to unreasonably burden and expense PPL Electric. 52 Pa. Code § 5.361(a). Beyond these general objections, PPL Electric also objects to the entirety of the January 21, 2025, Depositions insofar as they are irrelevant, vague, overly broad, unduly burdensome, duplicative, and sought in bad faith. Moreover, many of the written depositions directed at various of the Company’s current and former employees, ask the same questions of different individuals. The Complainant’s repeated attempts to ask multiple PPL Electric personnel or former personnel the same question and request the same documents is further evidence that the Complainant’s conduct, in discovery generally, is sought in bad faith and levied in an attempt to unreasonably annoy and harass the Company. This is particularly clear through the Complainant’s requests for certain contact information from the personnel or former personnel that he directs written depositions to, including cellphone numbers and email addresses. PPL Electric notes that the Complainant’s January 21, 2025 Depositions contain several numbering inaccuracies. For the purposes of these objections, PPL Electric objects to the entirety of the Complainant’s January 21, 2025 Depositions as they are presented chronologically, which may not precisely mirror the numbering method used by the Complainant.

In support, PPL Electric states as follows:

I. SPECIFIC OBJECTIONS

A. OBJECTIONS TO ABAD REQUEST FOR WRITTEN DEPOSITION – KERNOSHAK SET V

1. Kernoshak Set V, Nos. 1 through 50, request the following:¹

1. Did you input any data into the Work & Asset Management system (WAM) during this incident or for matters in this complaint? Please provide any information you entered in the WAM system.
2. Is this phone number 610-477-9092 your company cell phone from PPL or is it a personal phone?
3. Does PPL, the cell phone carrier, or yourself still have phone records of phone calls placed to and from Nieves Abad? Please provide this information. If this information was deleted or misplaced please explain why. If you have already provided this information in discovery please explain what documents you submitted.
4. Does PPL, the cell phone carrier, or yourself still have text messages placed to and from Nieves Abad? Please provide this information. If this information was deleted or misplaced please explain why. If you have already provided this information in discovery please explain what documents you submitted.
5. Does PPL, the cell phone carrier, or yourself still have voicemails placed to and from Nieves Abad? Please provide this information. If this information was deleted or misplaced please explain why. If you have already provided this information in discovery please explain what documents you submitted.
6. Please provide all phone records where you have conversations with other PPL employees, subcontractors, and supervisors about matters in this complaint that are not privileged. If this information was deleted or misplaced please explain why. If you have already provided this information in discovery please explain why documents you submitted.
7. Please provide all text messages where you have conversations with other PPL employees, subcontractors and supervisors about matters in this complaint that are not privileged. If this information was deleted or misplaced please explain why. If you have already provided this information in discovery please explain what documents you

¹ PPL Electric notes that the Complainant's written deposition of Tom Kernoshak, Set V, contained various misnumberings. For continuity and ease of reference, PPL Electric presents the Complainant's requests directed at Mr. Kernoshak as nos. 1-50.

submitted.

8. Please provide all voicemails where someone left you a message that was a PPL employee, subcontractors, and supervisors about matters in this complaint that are not privileged. If this information was deleted or misplaced please explain why. If you have already provided this information in discovery please explain what documents you submitted.
9. Does PPL provide you an email service with an email address? Please provide your company email address. Please provide all emails to and from Nieves Abad. If this information was deleted or misplaced please explain why. If you have already provided this information in discovery please explain what documents you submitted.
10. Please provide all emails between yourself and other PPL employees, subcontractors or supervisors regarding matters in this complaint that are not privileged. If this information was deleted or misplaced please explain why. If you have already provided this information in discovery please explain what documents you submitted.
11. Have you ever sent or received a fax regarding this complaint? Please provide this information. If this information was deleted or misplaced please explain why. If you have already provided this information in discovery please explain what documents you submitted.
12. Have you received any other information through memo, notes, or documentation about matters in this complaint that is not privileged. Please provide this information. If this information was deleted or misplaced please explain why. If you have already provided this information in discovery please explain what documents you submitted.
13. Did you have Mobile Operations Management Software (MOM) to take notes or input data, if so please answer and include all documents that are not privileged. Please include any information regarding this incident that you have not submitted during discovery. If you have already included these documents in discovery please list what documents you have included.
14. If you did not use the Mobile Operations Management Software (MOM) to input data, what system did you use? Please list the system you use and provide documents. If you have already included these documents in discovery please list what documents you have included.
15. Did you discuss the matters in this complaint, at 837 Rear Capouse Scranton with any other person including PPL Employees, Subcontractors, Personal acquaintances, or anyone else who is not privileged? Please list dates and in your own words, discuss

what you recall from each conversation?

16. Do you have any notes, documents, phone records, written or electronic communication or other information about pole numbers 57334N42685, 57339N46273, 57327N46297, 57320N46302, 571316N46296, and/or 57317N46297 with any PPL Employees, or subcontractors? Please attach a copy of any of the above requested information.
17. When responding to a work order how did you take notes of the work order details? Please explain what software system you use or what forms you have completed. Please include these documents. If provided please explain what documents you have provided. If documents are lost or you do not have them please explain what documents and why.
18. Throughout discovery the complainant has not received any notes, or descriptions from you about the matters in this complaint. Did you take any notes or save any information about matters in this complaint? Please explain why or why not? If provided in discovery please explain what notes you have provided.
19. Are there any documents or other evidence you have not submitted due to them being privileged that I have requested from you? Please provide how many documents or evidence you are withholding and provide what category of privilege they fall under.
20. When was tree removal discussed with you regarding the property in this complaint. Please state dates and explain what was discussed. Please explain what was discussed each time tree removal was discussed with you?
21. Do you have any information about tree removal at the property in this complaint from 3/1/23 to 7/1/23. If so please explain. If you do not have any information please explain why not.
22. Did you have any involvement making invoice number 91130032-3, claim #2023-00453? Please state all information that is factual as to what parts you participated in for this invoice and the dates you participated.
23. Did you have any involvement in making invoice number 91130033-3, claim 2023-00661? Please state all information that is factual as to what parts you participated in for this invoice and the dates you participated.
24. In your answers to questions in depositions you said utility pole # 57334N42685 is in fair condition. Please provide the dates you viewed this utility pole and a detailed report of your findings each time? If you have no notes on this pole please explain why not?

- A. Did you notice cracks or gouges in this utility pole?
- B. Did you observe any repairs that may have been done to this pole?
- C. Did you notice bug infestation on this pole?
- D. Was this pole in need of repair or replacement ?
- E. Did you notice decay on this pole?
- F. Did you make a work order for any matters with the pole? If so please provide the work order number. If not, Please explain why not.

25. In your answers to questions in depositions you said utility pole # 57339N46273 is in fair condition. Please provide the dates you viewed this utility pole and a detailed report of your findings each time? If you have no notes on this pole please explain why not?

- A. Did you notice cracks or gouges in this utility pole?
- B. Did you observe any repairs that may have been done to this pole?
- C. Did you notice bug infestation on this pole?
- D. Was this pole in need of repair or replacement?
- E. Did you notice decay on this pole?
- F. Did you make a work order for any matters with the pole? If so please provide the work order number. If not, Please explain why not.

26. In your answers to questions in depositions you said utility pole # 57327N46297 is in fair condition. Please provide the dates you viewed this utility pole and a detailed report of your findings each time? If you have no notes on this pole please explain why not?

- A. Did you notice cracks or gouges in this utility pole?
- B. Did you observe any repairs that may have been done to this pole?
- C. Did you notice bug infestation on this pole?
- D. Was this pole in need of repair or replacement ?
- E. Did you notice decay on this pole?
- F. Did you make a work order for any matters with the pole? If so please provide the work order number. If not, Please explain why not.

27. In your answers to questions in depositions you said utility pole # 57320N46302 is it fair condition. Please provide the dates you viewed this utility pole and a detailed report of your findings each time? If you have no notes on this pole please explain why not?

- A. Did you notice cracks or gouges in this utility pole?
- B. Did you observe any repairs that may have been done to this pole?
- C. Did you notice bug infestation on this pole?
- D. Was this pole in need of repair or replacement ?
- E. Did you notice decay on this pole?

- F. Did you make a work order for any matters with the pole? If so please provide the work order number. If not, Please explain why not.
28. In your answers to questions in depositions you said utility pole # 57316N46296 is in fair condition. Please provide the dates you viewed this utility pole and a detailed report of your findings each time? If you have no notes on this pole please explain why not?
- A. Did you notice cracks or gouges in this utility pole?
- B. Did you observe any repairs that may have been done to this pole?
- C. Did you notice bug infestation on this pole?
- D. Was this pole in need of repair or replacement ?
- E. Did you notice decay on this pole?
- F. Did you make a work order for any matters with the pole? If so please provide the work order number. If not, Please explain why not.
29. In your answers to questions in depositions you said utility pole # 57317N46297 is in fair condition. Please provide the dates you viewed this utility pole and a detailed report of your findings each time? If you have no notes on this pole please explain why not?
- A. Did you notice cracks or gouges in this utility pole?
- B. Did you observe any repairs that may have been done to this pole?
- C. Did you notice bug infestation on this pole?
- D. Was this pole in need of repair or replacement ?
- E. Did you notice decay on this pole?
- F. Did you make a work order for any matters with the pole? If so please provide the work order number. If not, Please explain why not.
30. In exhibit 1, w//o design # 12952883/309256 dated 6/6/23, there is an approximate property line on the drawing. Also there is a dot that represents pole# 57320N46302.
- A. Can you identify the dotted line that represents the property line? Please explain why you can identify this marking or why you can not.
- B. Can you identify the line that represents pole # 57320N46302. Please explain why you can identify this marking or why you can not.
- C. Can you identify the lines that represent Amity Court on the drawing. Please explain why you can identify this marking or why you can not.
- D. Do the lines represent Amity Court appear to end where they meet the approximate property line?

- E. On this drawing if the lines that represent Amity Court end at the approximate property line that represents where the property of Nieves Abad in this drawing?
31. What training have you received from PPL for utility pole and/or utility wire inspections for an electrical distribution system? Please provide each training course, memo, booklet, classes or any other documentation. Please provide dates when you received training and a brief description.
 32. What training have you received from PPL for utility pole or utility wire visual inspections for an electrical distribution system? Please provide each training course, memo, booklet, classes or any other documentation. Please provide dates when you received training and a brief description.
 33. What training have you received from PPL for utility pole or utility wire maintenance inspections for an electrical distribution system? Please provide each training course, memo, booklet, classes or any other documentation. Please provide dates when you received training and a brief description.
 34. What training have you received from PPL for utility pole or utility wire vegetation management for an electrical distribution system? Please provide each training course, memo, booklet, classes or any other documentation. Please provide dates when you received training and a brief description.
 35. Have you ever inspected a utility pole or utility wires while employed by PPL? If yes please estimate how many times. If not, please explain why not.
 36. Have you ever visually inspected a utility pole or utility wires while employed by PPL? If yes please estimate how many times. If not, please explain why not.
 37. Have you ever done vegetation management in a PPL right of way while employed by PPL? If yes, please estimate how many times. If not, please explain why not.
 38. Have you ever performed maintenance on a utility pole or utility wires while employed by PPL? If yes please estimate how many times. If not, please explain why not.
 39. What are the current standards PPL requires for clearances of vegetation in a PPL right of way for PPL distribution poles and wires.
 40. During your visit to the property of Nieves Abad, did you notice any vegetation intrusion to the PPL utility poles and wires in the right of way? Please explain the right of way conditions on that day.

41. While on the property of Nieves Abad did you notice any hazardous trees in or around the right of way of PPL owned utilities? If so, approximately how many. If not please explain.
42. Did you notify anyone in PPL of tree cutting activity around PPL's owned utilities in and around PPL's right of way on the property of Nieves Abad? If so, whom you notify. If not, please explain why not.
43. Did you make a work order for vegetation growth in and around PPL owned utilities on the property of Nieves Abad. Please explain why or why not.
44. On 04/26/23, when Nieves Abad called into the PPL call center. He asked to drop and de-energize utility wires for tree cutting. What role did you have in denying this request? Were you aware of this request?
45. Please describe what you know about the incident on 04/13/2023 involving tree cutting and damage to PPL owned Utilities on the property of Nieves Abad.
46. Please describe what role you played in resolving the incident on 04/13/2023 involving tree cutting and damage to PPL owned Utilities on the property of Nieves Abad.
47. Please describe what you know about the incident on 05/25/2023 involving tree cutting and damage to PPL owned Utilities on the property of Nieves Abad.
48. Please describe what role you played in resolving the incident on 05/25/2023 involving tree cutting and damage to PPL owned Utilities on the property of Nieves Abad.
49. Please describe what you know about the incident on 06/06/2023 involving tree cutting and damage to PPL owned Utilities on the property of Nieves Abad.
50. Please describe what role you played in resolving the incident on 06/06/2023 involving tree cutting and damage to PPL owned Utilities on the property of Nieves Abad.

2. Pursuant to Section 5.321(c) of the Commission's regulations, a party may obtain discovery of any matter not privileged that is relevant to a pending proceeding and that is reasonably calculated to lead to the discovery of admissible evidence. 52 Pa. Code § 5.321(c).

3. However, Section 5.361(a) of the Commission's regulations prohibits discovery which would "cause unreasonable annoyance, embarrassment, oppression, burden or expense to the deponent, a person or party" or "would require the making of an unreasonable investigation by the deponent, a party or witness." Id. § 5.361(a)(2), (4).

4. PPL Electric objects to Kernoshak Set V on the grounds that it seeks information that is not relevant, duplicative, and/or not reasonably calculated to lead to the discovery of admissible evidence. The Complainant has repeatedly asked for information related to unidentified work orders, the response to incidents at the Complainant's property, PPL Electric Employees' visits and notes related to the property, invoices rendered by PPL Electric, training and standard practices employed by PPL Electric, and PPL Electric's interpretations of written documents and answers already provided throughout this discovery process. To the extent that this information was not previously provided, it is because PPL Electric does not have more information to share, or properly objected to similar previous requests.

5. PPL Electric further objects to Kernoshak Set V because the requests are designed to unreasonably annoy, harass, and create unreasonable burden and expense to PPL Electric.

6. Similarly, PPL Electric objects to Kernoshak Set V because it is sought in bad faith. Indeed, as evidenced by the August 13, 2024, Order Clarifying Scope of Proceedings and Granting in Part and Denying in Part, Complainant's Motion to Compel, the sole issue to be litigated in this proceeding is whether PPL Electric has provided unreasonable service to the Complainant for allegedly failing to relocate certain utility poles on or near his property at his request. Inquiries regarding PPL Electric's vegetation management practices, training, site visits to analyze the condition of the disputed poles, among other things, are clearly outside the bounds of the scope of this proceeding and, in turn, are irrelevant. These requests are sought in bad faith, evidenced by the extremely voluminous sets of discovery propounded by the Complainant throughout this proceeding that is limited in scope. As to Mr. Kernoshak, this is the Complainant's fifth written deposition.

B. OBJECTIONS TO ABAD REQUEST FOR WRITTEN DEPOSITION – WALKER SET V

7. Walker set V, Nos. 1 through 71, request the following:²
1. Did you input any data into the Work & Asset Management system (WAM) during this incident or for matters in this complaint? Please provide any information you entered in the WAM system. Discovery has been ongoing for several months and it was asked that all records from your cell phone about this incident that is not privileged to be disclosed.
 2. Is this phone number 610-417-6076 your company cell phone from PPL or is it a personal cell phone?
 3. Does PPL, the cell phone carrier, or yourself still have phone records of phone calls placed to and from Nieves Abad? Please provide this information. If this information was deleted or misplaced please explain why. If you have already provided this information in discovery please explain what documents you submitted.
 4. Does PPL, the cell phone carrier, or yourself still have text messages placed to and from Nieves Abad? Please provide this information. If this information was deleted or misplaced please explain why. If you have already provided this information in discovery please explain what documents you submitted.
 5. Does PPL, the cell phone carrier, or yourself still have voicemails placed to and from Nieves Abad? Please provide this information. If this information was deleted or misplaced please explain why. If you have already provided this information in discovery please explain what documents you submitted.
 6. Please provide all phone records where you have conversations with other PPL employees, subcontractors, and supervisors about matters in this complaint that are not privileged. If this information was deleted or misplaced please explain why. If you have already provided this information in discovery please explain why documents you submitted.
 7. Please provide all text messages where you have conversations with other PPL employees, subcontractors and supervisors about matters in this complaint that are not privileged. If this information was deleted or misplaced please explain why. If you have already provided this information in discovery please explain what documents you submitted.

² The Complainant's written deposition Set V directed at Mr. Walker did not include a question 38, thus, there are 71 questions in total, rather than the 72 labelled by the Complainant.

8. Please provide all voicemails where someone left you a message that was a PPL employee, subcontractors, and supervisors about matters in this complaint that are not privileged. If this information was deleted or misplaced please explain why. If you have already provided this information in discovery please explain what documents you submitted.
9. Does PPL provide you an email service for email djwalker@pplweb.com? Please provide all emails to and from Nieves Abad. If this information was deleted or misplaced please explain why. If you have already provided this information in discovery please explain what documents you submitted.
10. Please provide all emails between yourself and other PPL employees, subcontractors or supervisors regarding matters in this complaint that are not privileged. If this information was deleted or misplaced please explain why. If you have already provided this information in discovery please explain what documents you submitted.
11. Have you ever sent or received a fax regarding this complaint? Please provide this information. If this information was deleted or misplaced please explain why. If you have already provided this information in discovery please explain what documents you submitted.
12. Have you received any other information through memo, notes, or documentation about matters in this complaint that is not privileged. Please provide this information. If this information was deleted or misplaced please explain why. If you have already provided this information in discovery please explain what documents you submitted.
13. Did you make any notes, statements, work records, documents, data, or any other form of written, electronic or voice transcripts of any events concerning matters for the property in this complaint. Please attach a copy of any of the above information with dates and times?
14. Did you discuss the matters in this complaint, at 837 Rear Capouse Scranton with any other person including PPL Employees, Personal acquaintances, subcontractors or anyone else who is not privileged? Please list dates and in your own words, discuss what you recall from each conversation?
15. Do you have any notes, documents, phone records, written or electronic communication or other information about pole numbers 57334N42685, 57339N46273, 57327N46297, 57320N46302, 571316N46296, and/or 57317N46297 with any PPL Employees, subcontractors, or anyone else regarding this matter? Information not privileged. Please attach a copy of any of the above requested information.

16. When responding to a work order how did you take notes of the work order details? Please explain what software system you use or what forms you have completed. Please include these documents. If provided please explain what documents you have provided. If documents are lost or you do not have them please explain what documents and why.
17. Are there any documents or other evidence you have not submitted due to them being privileged that I have requested from you? Please provide how many documents or evidence you are withholding and provide what category of privilege they fall under.
18. Did you have Mobile Operations Management Software (MOM) to take notes or input data, if so please answer and include all documents that are not privileged. Please include any information regarding this incident that you have submitted during discovery, If you have already included these documents in discovery please list what documents you have included.
19. If you did not use the Mobile Operations Management Software (MOM) to input data, what system did you use? Please list the system you use and provide documents. If you have already included these documents in discovery please list what documents you have included.
20. Throughout discovery the complainant has not received any notes, or descriptions from you about the matters in this complaint. Did you take any notes or save any information about matters in this complaint? Please explain why or why not.
21. Who was your supervisor between 03/1/23-12/31/23? Please list name, position and office address.
22. Did you discuss matters relevant to this complaint with your supervisor? Please list dates and description of matters discussed about this complaint. Please also include any notes, documents or any other documents that you may have between you and your supervisor that is not privileged. If provided please explain what documents were provided. If these notes are unavailable please explain the reason why.
23. Did you make your supervisor aware of the right of way dispute between involving the matters in this complaint. Did your supervisor give you any input or direction on how to handle matters in this complaint?
24. Did you make the decision to implement the 21 year prescriptive easement? If not, whose decision was it? If you did please explain why and what documentation you used to come to this conclusion.

25. Was your supervisor aware you were implementing a 21 year prescriptive easement for the utility poles and wires in this complaint?
26. Who instructed you to use a 21 year prescriptive easement for utility pole # 57334N42685?. Please list the name and position that made this decision.
27. Who instructed you to use a 21 year prescriptive easement for utility pole 57339N46273?. Please list the name and position that made this decision.
28. Who instructed you to use a 21 year prescriptive for utility pole # #57327N46297? Please list the name and position that made this decision.
29. Who instructed you to use a 21 year prescriptive easement for utility pole# 57320N46302? Please list the name and position that made this decision.
30. Who instructed you to use a 21 year prescriptive easement for utility pole # 571316N46296?. Please list the name and position that made this decision.
31. Who instructed you to use a 21 year prescriptive easement for utility pole # 57317N46297?. Please list the name and position that made this decision.
32. What did you discuss with your supervisor regarding any decision making for pole number 57339N46273? Please include any documentation, text messages, phone records regarding this pole and explain any conversations that took place with your supervisor.
33. What did you discuss with your supervisor regarding any decision making for pole number 57327N46297? Please include any documentation, text messages, phone records regarding this pole and explain any conversations that took place with your supervisor.
34. What did you discuss with your supervisor regarding any decision making for pole number 57320N46302? Please include any documentation, text messages, phone records regarding this pole and explain any conversations that took place with your supervisor.
35. What did you discuss with your supervisor regarding any decision making for pole number 57316N46296? Please include any documentation, text messages, phone records regarding this pole and explain any conversations that took place with your supervisor.
36. What did you discuss with your supervisor regarding any decision making for pole number 57317N46297? Please include any documentation, text messages, phone

records regarding this pole and explain any conversations that took place with your supervisor.

37. As of right of way agent for PPL that oversees the complainants property is it your job to ensure pole # 57320N46302 is in the public right of way or the property of Nieves Abad. Please explain why or why not. If not please explain who is responsible to place this utility pole in the right area.
38. In answers to questions in depositions you stated you cannot edit the information from the structural report of pole # 57334N42685 that you provided in exhibits. When an update is needed to be made for this pole, how is it updated into the system? When a change is needed to be made, how is it changed in the system?
39. In answers to questions in depositions you stated you cannot edit the information from the structural report of pole # 57320N46302 that you provided in exhibits. When an update is needed to be made for this pole, how is it updated into the system? When a change needs to be made, how is it changed in the system?
40. In answers to questions in depositions you stated you cannot edit the information from the structural report of pole # 57339N46273 that you provided in exhibits. When an update is needed to be made for this pole, how is it updated into the system? When a change is needed to be made, how is it changed in the system?
41. In answers to questions in depositions you stated you cannot edit the information from the structural report of pole # 57327N46297 that you provided in exhibits. When an update is needed to be made for this pole, how is it updated into the system? When a change is needed to be made, how is it changed in the system?
42. In answers to questions in depositions you stated you cannot edit the information from the structural report of pole # 57317N46297 that you provided in exhibits. When an update is needed to be made for this pole, how is it updated into the system? When a change is needed to be made, how is it changed in the system?
43. In answers to questions in depositions you stated you cannot edit the information from the structural report of pole # 57316N46296 that you provided in exhibits. When an update is needed to be made for this pole, how is it updated into the system? When a change is needed to be made, how is it changed in the system?
44. What training have you received from PPL for utility pole and/or utility wire inspections for an electrical distribution system? Please provide each training course, memo, booklet, classes or any other documentation. Please provide dates when you received training and a brief description.

45. What training have you received from PPL for utility pole or utility wire visual inspections for an electrical distribution system? Please provide each training course, memo, booklet, classes or any other documentation. Please provide dates when you received training and a brief description.
46. What training have you received from PPL for utility pole or utility wire maintenance inspections for an electrical distribution system? Please provide each training course, memo, booklet, classes or any other documentation. Please provide dates when you received training and a brief description.
47. What training have you received from PPL for utility pole or utility wire vegetation management for an electrical distribution system? Please provide each training course, memo, booklet, classes or any other documentation. Please provide dates when you received training and a brief description.
48. Have you ever inspected a utility pole or utility wires while employed by PPL? If yes please estimate how many times. If not, please explain why not.
49. Have you ever visually inspected a utility pole or utility wires while employed by PPL? If yes please estimate how many times. If not, please explain why not.
50. Have you ever done vegetation management in a PPL right of way while employed by PPL? If yes, please estimate how many times. If not, please explain why not.
51. Have you ever performed maintenance on a utility pole or utility wires while employed by PPL? If yes please estimate how many times. If not, please explain why not.
52. What are the current standards PPL requires for clearances of vegetation in a PPL right of way for PPL distribution poles and wires.
53. In your answers to questions in depositions you said utility pole \$ 57334N42685 is in fair condition. Please provide the dates you viewed this utility pole and a detailed report of your findings each time? If you have no notes on this pole please explain why not?
 - A. Did you notice cracks or gouges in this utility pole?
 - B. Did you observe any repairs that may have been done to this pole?
 - C. Did you notice bug infestation on this pole?
 - D. Was this pole in need of repair or replacement ?
 - E. Did you notice decay on this pole?
 - F. Did you make a work order for any matters with the pole? If so please provide the work order number. If not, Please explain why not.

54. In your answers to questions in depositions you said utility pole # 57339N46273 is in fair condition. Please provide the dates you viewed this utility pole and a detailed report of your findings each time? If you have no notes on this pole please explain why not?

- A. Did you notice cracks or gouges in this utility pole?
- B. Did you observe any repairs that may have been done to this pole?
- C. Did you notice bug infestation on this pole?
- D. Was this pole in need of repair or replacement ?
- E. Did you notice decay on this pole?
- F. Did you make a work order for any matters with the pole? If so please provide the work order number. If not, Please explain why not.

55. In your answers to questions in depositions you said utility pole # 57327N46297 is in fair condition. Please provide the dates you viewed this utility pole and a detailed report of your findings each time? If you have no notes on this pole please explain why not?

- A. Did you notice cracks or gouges in this utility pole?
- B. Did you observe any repairs that may have been done to this pole?
- C. Did you notice bug infestation on this pole?
- D. Was this pole in need of repair or replacement ?
- E. Did you notice decay on this pole?
- F. Did you make a work order for any matters with the pole? If so please provide the work order number. If not, Please explain why not.

56. In your answers to questions in depositions you said utility pole # 57320N46302 is it fair condition. Please provide the dates you viewed this utility pole and a detailed report of your findings each time? If you have no notes on this pole please explain why not?

- A. Did you notice cracks or gouges in this utility pole?
- B. Did you observe any repairs that may have been done to this pole?
- C. Did you notice bug infestation on this pole?
- D. Was this pole in need of repair or replacement ?
- E. Did you notice decay on this pole?
- F. Did you make a work order for any matters with the pole? If so please provide the work order number. If not, Please explain why not.

57. In your answers to questions in depositions you said utility pole # 57316N46296 is in fair condition. Please provide the dates you viewed this utility pole and a detailed report of your findings each time? If you have no notes on this pole please explain why not?

- A. Did you notice cracks or gouges in this utility pole?
- B. Did you observe any repairs that may have been done to this pole?
- C. Did you notice bug infestation on this pole?

- D. Was this pole in need of repair or replacement ?
- E. Did you notice decay on this pole?
- F. Did you make a work order for any matters with the pole? If so please provide the work order number. If not, Please explain why not.

58. In your answers to questions in depositions you said utility pole # 57317N46297 is in fair condition. Please provide the dates you viewed this utility pole and a detailed report of your findings each time? If you have no notes on this pole please explain why not?

- A. Did you notice cracks or gouges in this utility pole?
- B. Did you observe any repairs that may have been done to this pole?
- C. Did you notice bug infestation on this pole?
- D. Was this pole in need of repair or replacement ?
- E. Did you notice decay on this pole?
- F. Did you make a work order for any matters with the pole? If so please provide the work order number. If not, Please explain why not.³

59. Do you have in your notes of the date you first visited the property of Nieves Abad. If so, please provide. If you do not have notes please explain why not. If you did not take notes please explain why not. If these were provided in discovery please explain what was disclosed.

60. Please list all visits you made to the property of Nieves Abad? Also include a description of the PPL owned utilities and the conditions of the right of way on that day.?

61. During your visit did you notice any vegetation intrusion of the PPL utility poles and wires in the right of way? Please explain the right of way conditions.

62. While on the property of nieves abad did you notice any hazardous trees in or around the right of way of PPL owned utilities? If so, approximately how many. If not, please explain why not.

63. Did you notify anyone in PPL of tree cutting activity in and around PPL's owned utilities in and around PPI right of way on the property of Nieves Abad? If so, list whom you notified. If not, please explain why not.

64. Did you make a work order for vegetation growth in and around PPL owned utilities on the property of Nieves Abad. Please explain why or why not.

³ This question directed at Mr. Walker appears to have been erroneously labeled as question no. 36 in the document provided by the Complainant.

65. On 04/26/23, when Nieves Abad called into the PPL call center. He asked to drop and de-angerize utility wires for tree cutting. What role did you have in denying this request? Were you aware of this request?
66. Please describe what you know about the incident on 04/13/2023 involving tree cutting and damage to PPL owned Utilities on the property of Nieves Abad.
67. Please describe what role you played in resolving the incident on 04/13/2023 involving tree cutting and damage to PPL owned Utilities on the property of Nieves Abad.
68. Please describe what you know about the incident on 05/25/2023 involving tree cutting and damage to PPL owned Utilities on the property of Nieves Abad.
69. Please describe what role you played in resolving the incident on 05/25/2023 involving tree cutting and damage to PPL owned Utilities on the property of Nieves Abad.
70. Please describe what you know about the incident on 06/06/2023 involving tree cutting and damage to PPL owned Utilities on the property of Nieves Abad.
71. Please describe what role you played in resolving the incident on 06/06/2023 involving tree cutting and damage to PPL owned Utilities on the property of Nieves Abad.

8. Pursuant to Section 5.321(c) of the Commission’s regulations, a party may obtain discovery of any matter not privileged that is relevant to a pending proceeding and that is reasonably calculated to lead to the discovery of admissible evidence. 52 Pa. Code § 5.321(c).

9. However, Section 5.361(a) of the Commission’s regulations prohibits discovery which would “cause unreasonable annoyance, embarrassment, oppression, burden or expense to the deponent, a person or party” or “would require the making of an unreasonable investigation by the deponent, a party or witness.” Id. § 5.361(a)(2), (4).

10. PPL Electric objects to the entirety of Walker Set V on the grounds that it seeks information that is not relevant, is duplicative, and/or not reasonably calculated to lead to the discovery of admissible evidence. The Complainant has repeatedly asked for information related to unidentified work orders, the response to incidents at the Complainant’s property, PPL Electric Employees’ visits and notes related to the property, invoices rendered by PPL Electric, training and standard

practices employed by PPL Electric, and PPL Electric's interpretations of written documents and answers already provided throughout this discovery process. To the extent that this information was not previously provided, it is because PPL Electric does not have more information to share, or properly objected to similar previous requests. As discovery is ongoing, PPL Electric will supplement the response to this request.

11. PPL Electric further objects to Walker Set V because the requests therein are designed to unreasonably annoy, harass, and create unreasonable burden and expense to PPL Electric.

12. Similarly, PPL Electric objects to Walker Set V because it is sought in bad faith. Indeed, as evidenced by the August 13, 2024, Order Clarifying Scope of Proceedings and Granting in Part and Denying in Part, Complainant's Motion to Compel, the sole issue to be litigated in this proceeding is whether PPL Electric has provided unreasonable service to the Complainant for allegedly failing to relocate certain utility poles on or near his property at his request. Inquiries regarding PPL Electric's vegetation management practices, training, site visits to analyze the condition of the disputed poles, among other things, are clearly outside the bounds of the scope of this proceeding and, in turn, are irrelevant. These requests are sought in bad faith, evidenced by the extremely voluminous sets of discovery propounded by the Complainant throughout this proceeding that is limited in scope. As to Mr. Walker, this is the Complainant's fifth written deposition.

C. OBJECTIONS TO ABAD REQUEST FOR WRITTEN DEPOSITION – ROBERTS SET II

13. Roberts Set II, Nos. 1 through 102, request the following:

1. Have you physically viewed pole # 57316N46296 in the claim of Nieves Abad? If so please provide a detailed report of the findings on this pole. If not, please explain why you did not physically view this pole.
 - A. Please provide a description of this pole?

- B. What condition is this pole in?
 - C. Did you view the pole number plate on this pole?
 - D. Did you take any pictures of this pole?
 - E. Do you have any notes or other documents on this pole?
2. Have you physically viewed pole # 57334N42685 in the claim of Nieves Abad? If so please provide a detailed report of the findings on this pole. If not, please explain why you did not physically view this pole.
- A. Please provide a description of this pole?
 - B. What condition is this pole in?
 - C. Did you view the pole number plate on this pole?
 - D. Did you take any pictures of this pole?
 - E. Do you have any notes or other documents on this pole?
3. Have you physically viewed pole # 57320N46302 in the claim of Nieves Abad? If so please provide a detailed report of the findings on this pole. If not, please explain why you did not physically view this pole.
- A. Please provide a description of this pole?
 - B. What condition is this pole in?
 - C. Did you view the pole number plate on this pole?
 - D. Did you take any pictures of this pole?
 - E. Do you have any notes or other documents on this pole?
4. Have you physically viewed pole # 57339N46273 in the claim of Nieves Abad? If so please provide a detailed report of the findings on this pole. If not, please explain why you did not physically view this pole.
- A. Please provide a description of this pole?
 - B. What condition is this pole in?
 - C. Did you view the pole number plate on this pole?
 - D. Did you take any pictures of this pole?
 - E. Do you have any notes or other documents on this pole?
5. Have you physically viewed pole # 57327N46297 in the claim of Nieves Abad? If so please provide a detailed report of the findings on this pole. If not, please explain why you did not physically view this pole.
- A. Please provide a description of this pole?
 - B. What condition is this pole in?
 - C. Did you view the pole number plate on this pole?
 - D. Did you take any pictures of this pole?

- E. Do you have any notes or other documents on this pole?
6. Have you physically viewed pole # 57317N46297 in the claim of Nieves Abad? If so please provide a detailed report of the findings on this pole. If not, please explain why you did not physically view this pole.
 - A. Please provide a description of this pole?
 - B. What condition is this pole in?
 - C. Did you view the pole number plate on this pole?
 - D. Did you take any pictures of this pole?
 - E. Do you have any notes or other documents on this pole?
 7. On 05/25/2023 ,You arrived on complainants property after being dispatched for damaged PPL utility poles and wires. Please describe the scene when you arrived at 837 Rear Capouse Ave, Scranton PA 18509.
 8. Please describe the entire role you played during this incident and how long were you on the scene?
 9. What work was needed to be done to repair utility pole #57334N42685 to fix the problem ? Please explain the steps that were taken to repair.
 10. What work was needed to be done to repair utility pole #57320N46302 to fix the problem ? Please explain the steps that were taken to repair.
 11. What work was needed to be done to repair utility pole # 57339N46273 to fix the problem ? Please explain the steps that were taken to repair.
 12. What work was needed to be done to repair utility pole # 57327N46297 to fix the problem ? Please explain the steps that were taken to repair.
 13. What work was needed to be done to repair utility pole # 57317N46297 to fix the problem ? Please explain the steps that were taken to repair.
 14. Have you ever done a repair to utility pole # 57334N42685 or the wires attached to this pole on complainants property, for another incident during your career? Please include the date, what was done to resolve this issue or any other documentation you may have about the issue resolved or unresolved.
 15. Have you ever done a repair to utility pole # 57320N46302 or the wires attached to this pole on complainants property, for another incident during your career? Please include the date, what was done to resolve this issue or any other documentation you may have

about the issue resolved or unresolved.

16. Have you ever done a repair to utility pole # 57339N46273 or the wires attached to this pole on complainants property, for another incident during your career? Please include the date, what was done to resolve this issue or any other documentation you may have about the issue resolved or unresolved.
17. Have you ever done a repair to utility pole # 57327N46297 or the wires attached to this pole on complainants property, for another incident during your career? Please include the date, what was done to resolve this issue or any other documentation you may have about the issue resolved or unresolved.
18. Have you ever done a repair to utility pole # 57317N46297 or the wires attached to this pole on complainants property, for another incident during your career? Please include the date, what was done to resolve this issue or any other documentation you may have about the issue resolved or unresolved.
19. Have you ever done a repair to utility pole # 57316N46296 or the wires attached to this pole on complainants property, for another incident during your career? Please include the date, what was done to resolve this issue or any other documentation you may have about the issue resolved or unresolved.
20. How many spans of utility wire was needed to repair the damage to PPL Distribution System? Please list what overhead utility lines needed to be replaced.
21. Was there damage to the electrical service of any residential structure as a result of this incident? Please list what structures were damaged and what was needed for each structure to be replaced in order for power to be restored to their residences.
22. Was there power loss to any residential units in the area as a result of this incident? Please list all units that were without power, and the duration of the power loss.
23. How did you keep notes or input data for information about this incident? Please submit all documentation about this incident, if you provided this information in discovery please explain what notes you provided.
24. Did you have Mobile Operations Management Software (MOM) to take notes or input data, if so please answer and include all documents that are not privileged. Please include any information regarding this incident that you have not submitted during discovery, If you have already included these documents in discovery please list what documents you have included.

25. Has there been any documents or other evidence you have not submitted due to them being privileged that I have requested from you? Please provide how many documents or evidence you are withholding and provide what category of privilege they fall under.
26. If you did not use the Mobile Operations Management Software (MOM) to input data, what system did you use? Please list the system you use and provide documents. If you have already included these documents in discovery please list what documents you have included.
27. How many PPL employees were needed to resolve this incident?
28. Please list each employee's name, job title and business address of each employee involved in resolving this incident while you were on site on 05/25/2023.
29. Please list each employee that was on scene in resolving this incident on 05/25/2023 while you were on site?
30. Who was supervisor on 05/25/2023? Please list name, job title, and business address.
31. On 05/25/23, the day of the incident, was your supervisor on site of this accident located at 837 Rear Capouse Ave, Scranton Pa 18509 while you were present?
32. Did you need assistance in any way from Tom Kernoschak to resolve issues for this incident? If yes, please list what assistance you needed from Tom Kernoschak to resolve this issue.
33. Did you need assistance in any way from Daniel Walker to resolve issues for this incident? If yes, please list what assistance you needed from Daniel Walker to resolve this issue.
34. Did you need assistance in any way from Bill Farber to resolve issues for this incident? If yes, please list what assistance you need from Bill Farber to resolve this issue.
35. When filling out the incident report for the incident on 04/13//2023, why was certain information on form # 3781(2/2008) left blank? Please explain.
36. When filling out form # 3781(2/2008) how did you fill out this incident report? Was it done on a computer or hand written form?
37. Was this incident considered a billable event for the damage done to the utility poles and wires? Please explain why or why not.
38. What was the weather like at the time this incident took place, on 04/13/23? Please explain if it was cloudy, raining, sunny, foggy, windy or any other type of weather

event when this incident occurred.

39. Were you required to cut down any trees, whether they were on the ground or standing to resolve this matter. Please list what trees were cut and how many to resolve this matter.
40. What discussions did you have with other PPL employees regarding this matter? Please list each employee and a description of the discussion.
41. Did you upload any new data into any PPL systems regarding pole number 57334N42685 for work you completed to resolve this issue?
42. Did you upload any new data into any PPL systems regarding pole number 57320N46302 for work you completed to resolve this issue?
43. Did you upload any new data into any PPL systems regarding pole 57339N46273 number for work you completed to resolve this issue?
44. Did you upload any new data into any PPL systems regarding pole number 57327N46297 for work you completed to resolve this issue?
45. Did you upload any new data into any PPL systems regarding pole number 57317N46297 for work you completed to resolve this issue?
46. Did you upload any new data into any PPL systems regarding pole number 57316N46296 for work you completed to resolve this issue?
47. When replacing utility poles and/or wires on the complainants property, did you use a PPL Utility design drawing. Please enclose and list which drawing you used to replace PPL Utilities during this incident
48. What is the distance from utility pole# 5732046302 and 20 Amity Court Scranton Pa 18509? Please explain how you came to this calculation, if you did not measure please explain why not.
49. What is the distance from utility pole# 57327N46297 and 20 Amity Court Scranton Pa 18509? Please explain how you came to this calculation, if you did not measure please explain why not.
50. Are the utility wires between pole # 57320N46302 and 57327N46297 a safe distance from 20 Amity Court.

51. Did you place the utility wires between pole # 57320N46302 and pole # 57327N46297 while making repairs on 04/13/2025?
52. Does the utility wires between pole # 57320N46302 and # 57327N46297 block the ways of egress of the second story windows at 20 Amity Court Scranton Pa 18509?
53. How far are utility wires that run between pole # 57320N46302 and 57327N46297 from 20 Amity Court, Scranton Pa 18509. Please explain how you came to this calculation, if you did not measure please explain why not.
54. Is pole # 57320N46302 on the property of Nieves Abad?
55. Is pole# 57320N46302 in a public right of way?
56. Did you take any measurements to calculate the distance that this pole is from the property line of Nieves Abad in either direction. Please explain how you came to this calculation, if you did not measure please explain why not.
57. Have you ever performed maintenance on utility pole 57334N42685? Please provide any documentation you may have and the date this was done.
58. Have you ever performed maintenance on utility pole 57320N46302? Please provide any documentation you may have and the date this was done.
59. Have you ever performed maintenance on utility pole 57339N46273? Please provide any documentation you may have and the date this was done.
60. Have you ever performed maintenance on utility pole 57327N46297? Please provide any documentation you may have and the date this was done.
61. Have you ever performed maintenance on utility pole 57317N46297? Please provide any documentation you may have and the date this was done.
62. Have you ever performed maintenance on utility pole # 57316N46296? Please provide any documentation you may have and the date this was done.
63. Have you ever performed an inspection on pole 57334N42685? Please provide any documentation you may have and the date this was done.
64. Have you ever performed an inspection on pole 57320N46302? Please provide any documentation you may have and the date this was done.

65. Have you ever performed an inspection on pole 57339N46273? Please provide any documentation you may have and the date this was done.
66. Have you ever performed an inspection on pole 57327N46297 ? Please provide any documentation you may have and the date this was done.
67. Have you ever performed an inspection on pole 57317N46297? Please provide any documentation you may have and the date this was done.
68. Have you ever performed an inspection on pole 57316N46296? Please provide any documentation you may have and the date this was done.
69. Have you ever done a visual inspection on pole #57334N42685? Please list the dates and your results for this utility pole. Please also provide any documentation you have. If no inspection was done, please explain why not.
70. Have you ever done a visual inspection on pole # 57320N46302? Please list the dates and your results for this utility pole. Please also provide any documentation you have. If no inspection was done, please explain why not.
71. Have you ever done a visual inspection on pole # 57339N46273? Please list the dates and your results for this utility pole. Please also provide any documentation you have. If no inspection was done, please explain why not.
72. Have you ever done a visual inspection on pole # 57327N46297? Please list the dates and your results for this utility pole. Please also provide any documentation you have. If no inspection was done, please explain why not.
73. Have you ever done a visual inspection on pole # 57317N46297? Please list the dates and your results for this utility pole. Please also provide any documentation you have. If no inspection was done, please explain why not.
74. Have you ever done a visual inspection on pole # 57316N46296? Please list the dates and your results for this utility pole. Please also provide any documentation you have. If no inspection was done, please explain why not.
75. Are you involved in billing for invoice # 9113002-33 that PPL is using as a part of a Tariff? Please provide all dates you provided PPL with billing information and the information you provided.
76. What training have you received from PPL for utility pole and/or utility wire inspections for an electrical distribution system? Please provide each training course, memo, booklet, classes or any other documentation for matters in this complaint that

are not privileged. Please provide dates when you received training and a brief description.

77. What training have you received from PPL for utility pole or utility wire visual inspections for an electrical distribution system? Please provide each training course, memo, booklet, classes or any other documentation for matters in this complaint that are not privileged. Please provide dates when you received training and a brief description.
78. What training have you received from PPL for utility pole or utility wire maintenance inspections for an electrical distribution system? Please provide each training course, memo, booklet, classes or any other documentation for matters in this complaint that are not privileged. Please provide dates when you received training and a brief description.
79. What training have you received from PPL for utility pole or utility wire vegetation management for an electrical distribution system? Please provide each training course, memo, booklet, classes or any other documentation for vegetation management that are not privileged. Please provide dates when you received training and a brief description of the training for vegetation management.
80. Have you ever inspected a utility pole or utility wires while employed by PPL? If yes please estimate how many times. If not, please explain why not.
81. Have you ever visually inspected a utility pole or utility wires while employed by PPL? If yes please estimate how many times. If not, please explain why not.
82. Have you ever done vegetation management in a PPL right of way while employed by PPL? If yes, please estimate how many times. If not, please explain why not.
83. Have you ever performed maintenance on a utility pole or utility wires while employed by PPL? If yes please estimate how many times. If not, please explain why not.
84. After the incident on 04/13/23 did you reinforce pole # 57334N42685?
85. After the incident on 04/13//23 did you reinforce pole # 57320N46302?
86. After the incident on 04/13/23 did you reinforce pole # 57339N46273?
87. After the incident on 04/13/23 did you reinforce pole # 57327N46297?
88. After the incident on 04/13/23 did you reinforce pole # 57317N46297?

89. After the incident on 04/13/23 did you reinforce pole # 57316N46296?
90. Did you input any data into the Work & Asset Management system (WAM) during this incident or for matters in this complaint? Please provide any information you entered into the WAM system about this matter.
91. What are the current standards PPL requires for clearances of vegetation in a PPL right of way for its distribution poles and wires?
92. Is this service for your company using a cell phone from PPL or is it a personal phone? What is your company cell phone number?
93. Does PPL, the cell phone carrier, or yourself still have phone records of phone calls placed to and from Nieves Abad? Please provide this information. If this information was deleted or misplaced please explain why. If you have already provided this information in discovery please explain what documents you submitted.
94. Does PPL, the cell phone carrier, or yourself still have text messages placed to and from Nieves Abad? Please provide this information. If this information was deleted or misplaced please explain why. If you have already provided this information in discovery please explain what documents you submitted.
95. Does PPL, the cell phone carrier, or yourself still have voicemails placed to and from Nieves Abad? Please provide this information. If this information was deleted or misplaced please explain why. If you have already provided this information in discovery please provide the documents you submitted.
96. Please provide all phone records where you have conversations with other PPL employees, subcontractors, and supervisors about matters in this complaint that are not privileged. If this information was deleted or misplaced please explain why. If you have already provided this information in discovery please explain what documents you submitted.
97. Please provide all text messages where you have conversations with other PPL employees, subcontractors and supervisors about matters in this complaint that are not privileged. If this information was deleted or misplaced please explain why. If you have already provided this information in discovery please explain what documents you submitted.
98. Please provide all voicemails where someone left you a message that was a PPL employees, subcontractors, and supervisors about matters in this complaint that are not privileged. If this information was deleted or misplaced please explain why. If you have already provided this information in discovery please explain what documents you

submitted.

99. Does PPL provide you an email service with an email address? Please provide your company email address. Please provide all emails to and from Nieves Abad. If this information was deleted or misplaced please explain why. If you have already provided this information in discovery please explain what documents you submitted.

100. Please provide all emails between yourself and other PPL employees, subcontractors or supervisors regarding matters in this complaint that are not privileged. If this information was deleted or misplaced please explain why. If you have already provided this information in discovery please explain what documents you submitted.

101. Have you ever sent or received a fax regarding this complaint? If this information was deleted or misplaced please explain why. If you have already provided this information in discovery please explain the documents you submitted.

102. Have you received any other information through memo, notes, or documentation about matters in this complaint that is not privileged. If this information was deleted or misplaced please explain why. If you have already provided this information in discovery please explain what documents you submitted.

14. Pursuant to Section 5.321(c) of the Commission's regulations, a party may obtain discovery of any matter not privileged that is relevant to a pending proceeding and that is reasonably calculated to lead to the discovery of admissible evidence. 52 Pa. Code § 5.321(c).

15. However, Section 5.361(a) of the Commission's regulations prohibits discovery which would "cause unreasonable annoyance, embarrassment, oppression, burden or expense to the deponent, a person or party" or "would require the making of an unreasonable investigation by the deponent, a party or witness." Id. § 5.361(a)(2), (4).

16. PPL Electric objects to the entirety of Roberts Set II on the grounds that it seeks information that is not relevant, is duplicative, and/or not reasonably calculated to lead to the discovery of admissible evidence. The Complainant has repeatedly asked for information related to unidentified work orders, the response to incidents at the Complainant's property, PPL Electric Employees' visits and notes related to the property, invoices rendered by PPL Electric, training and standard

practices employed by PPL Electric, and PPL Electric's interpretations of written documents and answers already provided throughout this discovery process. To the extent that this information was not previously provided, it is because PPL Electric does not have more information to share, or properly objected to similar previous requests. As discovery is ongoing, PPL Electric will supplement the response to this request.

17. PPL Electric further objects to Roberts Set II because the requests therein are designed to unreasonably annoy, harass, and create unreasonable burden and expense to PPL Electric.

18. Similarly, PPL Electric objects to Roberts Set II because it is sought in bad faith. Indeed, as evidenced by the August 13, 2024, Order Clarifying Scope of Proceedings and Granting in Part and Denying in Part, Complainant's Motion to Compel, the sole issue to be litigated in this proceeding is whether PPL Electric has provided unreasonable service to the Complainant for allegedly failing to relocate certain utility poles on or near his property at his request. Inquiries regarding PPL Electric's vegetation management practices, training, site visits to analyze the condition of the disputed poles, among other things, are clearly outside the bounds of the scope of this proceeding and, in turn, are irrelevant. These requests are sought in bad faith, evidenced by the extremely voluminous sets of discovery propounded by the Complainant throughout this proceeding that is limited in scope. As to Mr. Roberts, this is the Complainant's second written deposition.

D. OBJECTIONS TO ABAD REQUEST FOR WRITTEN DEPOSITION – FARBER SET II

19. Farber Set II, Nos. 1 through 62, request the following:

1. Have you ever been to the property of Nieves Abad located at 837 Rear Capouse Ave, Scranton PA 18509? Please list the dates and describe the reason for your visit

2. Please describe what your duties are in the position you hold at PPL Electric Utilities Corp?
3. What is the area your position covers as a PPL Design supervisor?
4. How many employees do you oversee in your current position?
5. Did you have any involvement with repairs needed to be done after incident number 1 took place on 4/13/23 at 837 Rear Capouse Ave Scranton Pa 18509, where PPL owned equipment was damaged. Please provide the date, involvement and any documentation not already submitted into discovery. If you submitted these documents please explain what documents you submitted.
6. Did you have any involvement with repairs needed to be done after incident number 2 took place on 05/25/23 at 837 Rear Capouse Ave Scranton Pa 18509, where PPL owned equipment was damaged. Please provide the date, involvement and any documentation not already submitted into discovery. If you submitted these documents please explain what documents you submitted.
7. Did you have any involvement with repairs needed to be done after incident number 3 took place on 06/06/23 at 837 Rear Capouse Ave Scranton Pa 18509, where PPL owned equipment was damaged. Please provide the date, involvement and any documentation not already submitted into discovery. If you submitted these documents please explain what documents you submitted.
8. How did you keep notes or input data for information about these incidents? Please submit all documentation about this incident where you have notes or other documents not privileged that you did not submit during discovery. If you submitted these documents please explain what documents you submitted.
9. Did you have Mobile Operations Management Software (MOM) to take notes or input data not privileged? Please include any information regarding this incident that you have not submitted during discovery. If you submitted these documents please explain what documents you submitted.
10. If you did not use the Mobile Operations Management Software (MOM) to input data, what system did you use? Please list the system you use and provide documents. If you have already included these documents in discovery please list what documents you have included.
11. What discussions did you have with other PPL employees or subcontractors regarding this matter that is not privileged? Please list the date, each employee and description of

what was discussed?

12. Has there been any documents or other evidence not submitted due to them being privileged that I have requested from you? Please provide how many documents or evidence you are withholding and provide what category of privilege they fall under.
13. Have you physically viewed pole # 57334N42685 in the claim of Nieves Abad? If so please provide a detailed report of the findings on this pole. If not, please explain why you did not physically view this pole.
 - A. Please provide a description of this pole?
 - B. What condition is this pole in?
 - C. Did you view the pole number plate on this pole?
 - D. DId you take any pictures of this pole?
 - E. Do you have any notes or other documents on this pole?
14. Have you physically viewed pole # 57320N46302 in the claim of Nieves Abad? If so please provide a detailed report of the findings on this pole. If not, please explain why you did not physically view this pole.
 - A. Please provide a description of this pole?
 - B. What condition is this pole in?
 - C. Did you view the pole number plate on this pole?
 - D. DId you take any pictures of this pole?
 - E. Do you have any notes or other documents on this pole?
15. Have you physically viewed pole # 57339N46273 in the claim of Nieves Abad? If so please provide a detailed report of the findings on this pole. If not, please explain why you did not physically view this pole.
 - A. Please provide a description of this pole?
 - B. What condition is this pole in?
 - C. Did you view the pole number plate on this pole?
 - D. DId you take any pictures of this pole?
 - E. Do you have any notes or other documents on this pole?
16. Have you physically viewed pole # 57327N46297 in the claim of Nieves Abad? If so please provide a detailed report of the findings on this pole. If not, please explain why you did not physically view this pole.
 - A. Please provide a description of this pole?
 - B. What condition is this pole in?
 - C. Did you view the pole number plate on this pole?

- D. Did you take any pictures of this pole?
 - E. Do you have any notes or other documents on this pole?
17. Have you physically viewed pole # 57317N46297 in the claim of Nieves Abad? If so please provide a detailed report of the findings on this pole. If not, please explain why you did not physically view this pole.
- A. Please provide a description of this pole?
 - B. What condition is this pole in?
 - C. Did you view the pole number plate on this pole?
 - D. Did you take any pictures of this pole?
 - E. Do you have any notes or other documents on this pole?
18. Have you physically viewed pole # 57316N46296 in the claim of Nieves Abad? If so please provide a detailed report of the findings on this pole. If not, please explain why you did not physically view this pole.
- A. Please provide a description of this pole?
 - B. What condition is this pole in?
 - C. Did you view the pole number plate on this pole?
 - D. Did you take any pictures of this pole?
 - E. Do you have any notes or other documents on this pole?
19. Have you ever performed maintenance on utility pole 57334N42685? Please provide any documentation you may have and the date this was done.
20. Have you ever performed maintenance on utility pole 57320N46302? Please provide any documentation you may have and how this was done.
21. Have you ever performed maintenance on utility pole 57339N46273? Please provide any documentation you may have and the date this was done.
22. Have you ever performed maintenance on utility pole 57327N46297? Please provide any documentation you may have and the date this was done.
23. Have you ever performed maintenance on utility pole 57317N46297? Please provide any documentation you may have and the date this was done.
24. Have you ever performed maintenance on utility pole 57316N46296? Please provide any documentation you may have and the date this was done.

25. Have you ever performed an inspection on pole 57334N42685? Please provide any documentation you may have and the date this was done.
26. Have you ever performed an inspection on pole 57320N46302? Please provide any documentation you may have and the date this was done.
27. Have you ever performed an inspection on pole 57339N46273? Please provide any documentation you may have and the date this was done.
28. Have you ever performed an inspection on pole 57327N46297? Please provide any documentation you may have and the date this was done.
29. Have you ever performed an inspection on pole 57317N46297? Please provide any documentation you may have and the date this was done.
30. Have you ever performed an inspection on pole 57316N46296? Please provide any documentation you may have and the date this was done.
31. Have you ever done a visual inspection on pole #57334N42685? Please list the dates and your results for this utility pole. Please also provide any documentation you have. If no inspection was done, please explain why not.
32. Have you ever done a visual inspection on pole # 57320N46302? Please list the dates and your results for this utility pole. Please also provide any documentation you have. If no inspection was done, please explain why not.
33. Have you ever done a visual inspection on pole # 57339N46273? Please list the dates and your results for this utility pole. Please also provide any documentation you have. If no inspection was done, please explain why not.
34. Have you ever done a visual inspection on pole # 57327N46297? Please list the dates and your results for this utility pole. Please also provide any documentation you have. If no inspection was done, please explain why not.
35. Have you ever done a visual inspection on pole # 57317N46297? Please list the dates and your results for this utility pole. Please also provide any documentation you have. If no inspection was done, please explain why not.
36. Have you ever done a visual inspection on pole # 57316N46296? Please list the dates and your results for this utility pole. Please also provide any documentation you have. If no inspection was done, please explain why not.

37. Have you ever done vegetation management on pole #57334N42685? Please list the dates and please also provide any documentation you have. If vegetation management was not done, please explain why not.
38. Have you ever done vegetation management on pole # 57320N46302? Please list the dates and your results for this utility pole. Please also provide any documentation you have. If no inspection was done, please explain why not.
39. Have you ever done vegetation management on pole # 57339N46273? Please list the dates and your results for this utility pole. Please also provide any documentation you have. If no inspection was done, please explain why not.
40. Have you ever done vegetation management on pole # 57327N46297? Please list the dates and please also provide any documentation you have. If no inspection was done, please explain why not.
41. Have you ever done vegetation management on pole # 57317N46297? Please list the dates and please also provide any documentation you have. If no inspection was done, please explain why not.
42. Have you ever done vegetation management on pole # 57316N46296? Please list the dates and also provide any documentation you have. If no inspection was done, please explain why not.
43. Do you have a company cell phone from PPL? If so please provide your company phone number.
44. Does PPL, the cell phone carrier, or yourself still have phone records of phone calls placed to and from Nieves Abad? Please provide this information. If this information was deleted or misplaced please explain why. If you have already provided this information in discovery please explain what documents you submitted.
45. Does PPL, the cell phone carrier, or yourself still have text messages placed to and from Nieves Abad? Please provide this information. If this information was deleted or misplaced please explain why. If you have already provided this information in discovery please explain what documents you submitted.
46. Does PPL, the cell phone carrier, or yourself still have voicemails placed to and from Nieves Abad? Please provide this information. If this information was deleted or misplaced please explain why. If you have already provided this information in discovery please explain what documents you submitted.

47. Please provide all phone records where you have conversations with other PPL employees, subcontractors, and supervisors about matters in this complaint that are not privileged. If this information was deleted or misplaced please explain why. If you have already provided this information in discovery please explain why documents you submitted.
48. Please provide all text messages where you have conversations with other PPL employees, subcontractors and supervisors about matters in this complaint that are not privileged. If this information was deleted or misplaced please explain why. If you have already provided this information in discovery please explain what documents you submitted.
49. Please provide all voicemails where someone left you a message that was a PPL employee, subcontractors, and supervisors about matters in this complaint that are not privileged. If this information was deleted or misplaced please explain why. If you have already provided this information in discovery please explain what documents you submitted.
50. Does PPL provide you an email service with an email address? Please provide your company email address. Please provide all emails to and from Nieves Abad. If this information was deleted or misplaced please explain why. If you have already provided this information in discovery please explain what documents you submitted.
51. Please provide all emails between yourself and other PPL employees, subcontractors or supervisors regarding matters in this complaint that are not privileged. If this information was deleted or misplaced please explain why. If you have already provided this information in discovery please explain what documents you submitted.
52. Have you ever sent or received a fax regarding this complaint? Please provide this information. If this information was deleted or misplaced please explain why. If you have already provided this information in discovery please explain what documents you submitted.
53. What training have you received from PPL for utility pole and/or utility wire inspections for an electrical distribution system? Please provide each training course, memo, booklet, classes or any other documentation that is not privileged. Please provide dates when you received training and a brief description.
54. What training have you received from PPL for utility pole or utility wire visual inspections for an electrical distribution system? Please provide each training course, memo, booklet, classes or any other documentation that is not privileged. Please provide dates when you received training and a brief description.

55. What training have you received from PPL for utility pole or utility wire maintenance inspections for an electrical distribution system? Please provide each training course, memo, booklet, classes or any other documentation that is not privileged. Please provide dates when you received training and a brief description.
56. What training have you received from PPL for utility pole or utility wire vegetation management for an electrical distribution system? Please provide each training course, memo, booklet, classes or any other documentation that is not privileged. Please provide dates when you received training and a brief description.
57. Have you ever inspected a utility pole or utility wires while employed by PPL? If yes please estimate how many times. If not, please explain why not.
58. Have you ever visually inspected a utility pole or utility wires while employed by PPL? If yes please estimate how many times. If not, please explain why not.
59. Have you ever done vegetation management in a PPL right of way while employed by PPL? If yes, please estimate how many times. If not, please explain why not.
60. Have you ever performed maintenance on a utility pole or utility wires while employed by PPL? If yes please estimate how many times. If not, please explain why not.
61. What are the current standards PPL requires for clearances of vegetation in a PPL right of way for PPL distribution poles and wires?
62. Did you input any data into the Work & Asset Management system (WAM) during this incident or for matters in this complaint? Please provide any information you entered into the WAM system about this matter.

20. Pursuant to Section 5.321(c) of the Commission’s regulations, a party may obtain discovery of any matter not privileged that is relevant to a pending proceeding and that is reasonably calculated to lead to the discovery of admissible evidence. 52 Pa. Code § 5.321(c).

21. However, Section 5.361(a) of the Commission’s regulations prohibits discovery which would “cause unreasonable annoyance, embarrassment, oppression, burden or expense to the deponent, a person or party” or “would require the making of an unreasonable investigation by the deponent, a party or witness.” Id. § 5.361(a)(2), (4).

22. PPL Electric objects to the entirety of Farber Set II on the grounds that information these

requests seek is not relevant, is duplicative, and/or not reasonably calculated to lead to the discovery of admissible evidence. The Complainant has repeatedly asked for information related to unidentified work orders, the response to incidents at the Complainant's property, PPL Electric Employees' visits and notes related to the property, invoices rendered by PPL Electric, training and standard practices employed by PPL Electric, and PPL Electric's interpretations of written documents and answers already provided throughout this discovery process. To the extent that this information was not previously provided, it is because PPL Electric does not have more information to share, or properly objected to similar previous requests. As discovery is ongoing, PPL Electric will supplement the response to this request.

23. PPL Electric further objects to the entirety of Farber Set II because the requests are designed to unreasonably annoy, harass, and create unreasonable burden and expense to PPL Electric.

24. Similarly, PPL Electric objects to the entirety of Farber Set II because it is sought in bad faith. Indeed, as evidenced by the August 13, 2024, Order Clarifying Scope of Proceedings and Granting in Part and Denying in Part, Complainant's Motion to Compel, the sole issue to be litigated in this proceeding is whether PPL Electric has provided unreasonable service to the Complainant for allegedly failing to relocate certain utility poles on or near his property at his request. Inquiries regarding PPL Electric's vegetation management practices, training, site visits to analyze the condition of the disputed poles, among other things, are clearly outside the bounds of the scope of this proceeding and, in turn, are irrelevant. These requests are sought in bad faith, evidenced by the extremely voluminous sets of discovery propounded by the Complainant throughout this proceeding that is limited in scope.

**E. OBJECTIONS TO ABAD REQUEST FOR WRITTEN DEPOSITION –
ROSATO SET II**

25. Rosato Set II, Nos. 1 through 102, request the following:

1. Have you physically viewed pole # 57316N46296 in the claim of Nieves Abad? If so please provide a detailed report of the findings on this pole. If not, please explain why you did not physically view this pole.
 - A. Please provide a description of this pole?
 - B. What condition is this pole in?
 - C. Did you view the pole number plate on this pole?
 - D. Did you take any pictures of this pole?
 - E. Do you have any notes or other documents on this pole?

2. Have you physically viewed pole # 57334N42685 in the claim of Nieves Abad? If so please provide a detailed report of the findings on this pole. If not, please explain why you did not physically view this pole.
 - A. Please provide a description of this pole?
 - B. What condition is this pole in?
 - C. Did you view the pole number plate on this pole?
 - D. Did you take any pictures of this pole?
 - E. Do you have any notes or other documents on this pole?

3. Have you physically viewed pole # 57320N46302 in the claim of Nieves Abad? If so please provide a detailed report of the findings on this pole. If not, please explain why you did not physically view this pole.
 - A. Please provide a description of this pole?
 - B. What condition is this pole in?
 - C. Did you view the pole number plate on this pole?
 - D. Did you take any pictures of this pole?
 - E. Do you have any notes or other documents on this pole?

4. Have you physically viewed pole # 57339N46273 in the claim of Nieves Abad? If so please provide a detailed report of the findings on this pole. If not, please explain why you did not physically view this pole.
 - A. Please provide a description of this pole?
 - B. What condition is this pole in?
 - C. Did you view the pole number plate on this pole?
 - D. Did you take any pictures of this pole?

- E. Do you have any notes or other documents on this pole?
5. Have you physically viewed pole # 57327N46297 in the claim of Nieves Abad? If so please provide a detailed report of the findings on this pole. If not, please explain why you did not physically view this pole.
 - A. Please provide a description of this pole?
 - B. What condition is this pole in?
 - C. Did you view the pole number plate on this pole?
 - D. Did you take any pictures of this pole?
 - E. Do you have any notes or other documents on this pole?
 6. Have you physically viewed pole # 57317N46297 in the claim of Nieves Abad? If so please provide a detailed report of the findings on this pole. If not, please explain why you did not physically view this pole.
 - A. Please provide a description of this pole?
 - B. What condition is this pole in?
 - C. Did you view the pole number plate on this pole?
 - D. Did you take any pictures of this pole?
 - E. Do you have any notes or other documents on this pole?
 7. On 04/13/2023 ,You arrived on complainants property after being dispatched for damaged PPL utility poles and wires. Please describe the scene when you arrived at 837 Rear Capouse Ave, Scranton PA 18509.
 8. Please describe the entire role you played during this incident and how long were you on the scene?
 9. What work was needed to be done to repair utility pole #57334N42685 to fix the problem ? Please explain the steps that were taken to repair.
 10. What work was needed to be done to repair utility pole #57320N46302 to fix the problem ? Please explain the steps that were taken to repair.
 11. What work was needed to be done to repair utility pole # 57339N46273 to fix the problem ? Please explain the steps that were taken to repair.
 12. What work was needed to be done to repair utility pole # 57327N46297 to fix the problem ? Please explain the steps that were taken to repair.

13. What work was needed to be done to repair utility pole # 57317N46297 to fix the problem ? Please explain the steps that were taken to repair.
14. Have you ever done a repair to utility pole # 57334N42685 or the wires attached to this pole on complainants property, for another incident during your career? Please include the date, what was done to resolve this issue or any other documentation you may have about the issue resolved or unresolved.
15. Have you ever done a repair to utility pole # 57320N46302 or the wires attached to this pole on complainants property, for another incident during your career? Please include the date, what was done to resolve this issue or any other documentation you may have about the issue resolved or unresolved.
16. Have you ever done a repair to utility pole # 57339N46273 or the wires attached to this pole on complainants property, for another incident during your career? Please include the date, what was done to resolve this issue or any other documentation you may have about the issue resolved or unresolved.
17. Have you ever done a repair to utility pole # 57327N46297 or the wires attached to this pole on complainants property, for another incident during your career? Please include the date, what was done to resolve this issue or any other documentation you may have about the issue resolved or unresolved.
18. Have you ever done a repair to utility pole # 57317N46297 or the wires attached to this pole on complainants property, for another incident during your career? Please include the date, what was done to resolve this issue or any other documentation you may have about the issue resolved or unresolved.
19. Have you ever done a repair to utility pole # 57316N46296 or the wires attached to this pole on complainants property, for another incident during your career? Please include the date, what was done to resolve this issue or any other documentation you may have about the issue resolved or unresolved.
20. How many spans of utility wire was needed to repair the damage to PPL Distribution System? Please list what overhead utility lines needed to be replaced.
21. Was there damage to the electrical service of any residential structure as a result of this incident? Please list what structures were damaged and what was needed for each structure to be replaced in order for power to be restored to their residences.
22. Was there power loss to any residential units in the area as a result of this incident? Please list all units that were without power, and the duration of the power loss.

23. How did you keep notes or input data for information about this incident? Please submit all documentation about this incident, if you provided this information in discovery please explain what notes you provided.
24. Did you have Mobile Operations Management Software (MOM) to take notes or input data, if so please answer and include all documents that are not privileged. Please include any information regarding this incident that you have not submitted during discovery, If you have already included these documents in discovery please list what documents you have included.
25. Has there been any documents or other evidence you have not submitted due to them being privileged that I have requested from you? Please provide how many documents or evidence you are withholding and provide what category of privilege they fall under.
26. If you did not use the Mobile Operations Management Software (MOM) to input data, what system did you use? Please list the system you use and provide documents. If you have already included these documents in discovery please list what documents you have included.
27. How many PPL employees were needed to resolve this incident?
28. Please list each employee's name, job title and business address of each employee involved in resolving this incident while you were on site on 04/13/2023.
29. Please list each employee that was on scene in resolving this incident on 04/13/2023 while you were on site?
30. Who was supervisor on 04/13/2023? Please list name, job title, and business address.
31. On 04/13/23, the day of the incident, was your supervisor on site of this accident located at 837 Rear Capouse Ave, Scranton Pa 18509 while you were present?
32. Did you need assistance in any way from Tom Kernoschak to resolve issues for this incident? If yes, please list what assistance you needed from Tom Kernoschak to resolve this issue.
33. Did you need assistance in any way from Daniel Walker to resolve issues for this incident? If yes, please list what assistance you needed from Daniel Walker to resolve this issue.
34. Did you need assistance in any way from Bill Farber to resolve issues for this incident? If yes, please list what assistance you need from Bill Farber to resolve this issue.

35. When filling out the incident report for the incident on 04/13//2023, why was certain information on form # 3781(2/2008) left blank? Please explain.
36. When filling out form # 3781(2/2008) how did you fill out this incident report? Was it done on a computer or hand written form?
37. Was this incident considered a billable event for the damage done to the utility poles and wires? Please explain why or why not.
38. What was the weather like at the time this incident took place, on 04/13/23? Please explain if it was cloudy, raining, sunny, foggy, windy or any other type of weather event when this incident occurred.
39. Were you required to cut down any trees, whether they were on the ground or standing to resolve this matter. Please list what trees were cut and how many to resolve this matter.
40. What discussions did you have with other PPL employees regarding this matter? Please list each employee and a description of the discussion.
41. Did you upload any new data into any PPL systems regarding pole number 57334N42685 for work you completed to resolve this issue?.
42. Did you upload any new data into any PPL systems regarding pole number 57320N46302 for work you completed to resolve this issue?
43. Did you upload any new data into any PPL systems regarding pole 57339N46273 number for work you completed to resolve this issue?
44. Did you upload any new data into any PPL systems regarding pole number 57327N46297 for work you completed to resolve this issue?
45. Did you upload any new data into any PPL systems regarding pole number 57317N46297 for work you completed to resolve this issue?
46. Did you upload any new data into any PPL systems regarding pole number 57316N46296 for work you completed to resolve this issue?
47. When replacing utility poles and/or wires on the complainants property, did you use a PPL Utility design drawing. Please enclose and list which drawing you used to replace PPL Utilities during this incident

48. What is the distance from utility pole# 5732046302 and 20 Amity Court Scranton Pa 18509? Please explain how you came to this calculation, if you did not measure please explain why not.
49. What is the distance from utility pole# 57327N46297 and 20 Amity Court Scranton Pa 18509? Please explain how you came to this calculation, if you did not measure please explain why not.
50. Are the utility wires between pole # 57320N46302 and 57327N46297 a safe distance from 20 Amity Court.
51. Did you place the utility wires between pole # 57320N46302 and pole # 57327N46297 while making repairs on 04/13/2025?
52. Does the utility wires between pole # 57320N46302 and # 57327N46297 block the ways of egress of the second story windows at 20 Amity Court Scranton Pa 18509?
53. How far are utility wires that run between pole # 57320N46302 and 57327N46297 from 20 Amity Court, Scranton Pa 18509. Please explain how you came to this calculation, if you did not measure please explain why not.
54. Is pole # 57320N46302 on the property of Nieves Abad?
55. Is pole# 57320N46302 in a public right of way?
56. Did you take any measurements to calculate the distance that this pole is from the property line of Nieves Abad in either direction. Please explain how you came to this calculation, if you did not measure please explain why not.
57. Have you ever performed maintenance on utility pole 57334N42685? Please provide any documentation you may have and the date this was done.
58. Have you ever performed maintenance on utility pole 57320N46302? Please provide any documentation you may have and the date this was done.
59. Have you ever performed maintenance on utility pole 57339N46273? Please provide any documentation you may have and the date this was done.
60. Have you ever performed maintenance on utility pole 57327N46297? Please provide any documentation you may have and the date this was done.

61. Have you ever performed maintenance on utility pole 57317N46297? Please provide any documentation you may have and the date this was done.
62. Have you ever performed maintenance on utility pole # 57316N46296? Please provide any documentation you may have and the date this was done.
63. Have you ever performed an inspection on pole 57334N42685? Please provide any documentation you may have and the date this was done.
64. Have you ever performed an inspection on pole 57320N46302? Please provide any documentation you may have and the date this was done.
65. Have you ever performed an inspection on pole 57339N46273? Please provide any documentation you may have and the date this was done.
66. Have you ever performed an inspection on pole 57327N46297 ? Please provide any documentation you may have and the date this was done.
67. Have you ever performed an inspection on pole 57317N46297? Please provide any documentation you may have and the date this was done.
68. Have you ever performed an inspection on pole 57316N46296? Please provide any documentation you may have and the date this was done.
69. Have you ever done a visual inspection on pole #57334N42685? Please list the dates and your results for this utility pole. Please also provide any documentation you have. If no inspection was done, please explain why not.
70. Have you ever done a visual inspection on pole # 57320N46302? Please list the dates and your results for this utility pole. Please also provide any documentation you have. If no inspection was done, please explain why not.
71. Have you ever done a visual inspection on pole # 57339N46273? Please list the dates and your results for this utility pole. Please also provide any documentation you have. If no inspection was done, please explain why not.
72. Have you ever done a visual inspection on pole # 57327N46297? Please list the dates and your results for this utility pole. Please also provide any documentation you have. If no inspection was done, please explain why not.
73. Have you ever done a visual inspection on pole # 57317N46297? Please list the dates and your results for this utility pole. Please also provide any documentation you have.

If no inspection was done, please explain why not.

74. Have you ever done a visual inspection on pole # 57316N46296? Please list the dates and your results for this utility pole. Please also provide any documentation you have. If no inspection was done, please explain why not.
75. Are you involved in billing for invoice # 9113002-33 that PPL is using as a part of a Tariff? Please provide all dates you provided PPL with billing information and the information you provided.
76. What training have you received from PPL for utility pole and/or utility wire inspections for an electrical distribution system? Please provide each training course, memo, booklet, classes or any other documentation for matters in this complaint that are not privileged. Please provide dates when you received training and a brief description.
77. What training have you received from PPL for utility pole or utility wire visual inspections for an electrical distribution system? Please provide each training course, memo, booklet, classes or any other documentation for matters in this complaint that are not privileged. Please provide dates when you received training and a brief description.
78. What training have you received from PPL for utility pole or utility wire maintenance inspections for an electrical distribution system? Please provide each training course, memo, booklet, classes or any other documentation for matters in this complaint that are not privileged. Please provide dates when you received training and a brief description.
79. What training have you received from PPL for utility pole or utility wire vegetation management for an electrical distribution system? Please provide each training course, memo, booklet, classes or any other documentation for vegetation management that are not privileged. Please provide dates when you received training and a brief description of the training for vegetation management.
80. Have you ever inspected a utility pole or utility wires while employed by PPL? If yes please estimate how many times. If not, please explain why not.
81. Have you ever visually inspected a utility pole or utility wires while employed by PPL? If yes please estimate how many times. If not, please explain why not.
82. Have you ever done vegetation management in a PPL right of way while employed by PPL? If yes, please estimate how many times. If not, please explain why not.

83. Have you ever performed maintenance on a utility pole or utility wires while employed by PPL? If yes please estimate how many times. If not, please explain why not.
84. After the incident on 04/13/23 did you reinforce pole # 57334N42685?
85. After the incident on 04/13//23 did you reinforce pole # 57320N46302?
86. After the incident on 04/13/23 did you reinforce pole # 57339N46273?
87. After the incident on 04/13/23 did you reinforce pole # 57327N46297?
88. After the incident on 04/13/23 did you reinforce pole # 57317N46297?
89. After the incident on 04/13/23 did you reinforce pole # 57316N46296?
90. Did you input any data into the Work & Asset Management system (WAM) during this incident or for matters in this complaint? Please provide any information you entered into the WAM system about this matter.
91. What are the current standards PPL requires for clearances of vegetation in a PPL right of way for its distribution poles and wires?
92. Is this service for your company using a cell phone from PPL or is it a personal phone? What is your company cell phone number?
93. Does PPL, the cell phone carrier, or yourself still have phone records of phone calls placed to and from Nieves Abad? Please provide this information. If this information was deleted or misplaced please explain why. If you have already provided this information in discovery please explain what documents you submitted.
94. Does PPL, the cell phone carrier, or yourself still have text messages placed to and from Nieves Abad? Please provide this information. If this information was deleted or misplaced please explain why. If you have already provided this information in discovery please explain what documents you submitted.
95. Does PPL, the cell phone carrier, or yourself still have voicemails placed to and from Nieves Abad? Please provide this information. If this information was deleted or misplaced please explain why. If you have already provided this information in discovery please provide the documents you submitted.
96. Please provide all phone records where you have conversations with other PPL employees, subcontractors, and supervisors about matters in this complaint that are not privileged. If this information was deleted or misplaced please explain why. If you have

already provided this information in discovery please explain what documents you submitted.

97. Please provide all text messages where you have conversations with other PPL employees, subcontractors and supervisors about matters in this complaint that are not privileged. If this information was deleted or misplaced please explain why. If you have already provided this information in discovery please explain what documents you submitted.

98. Please provide all voicemails where someone left you a message that was a PPL employees, subcontractors, and supervisors about matters in this complaint that are not privileged. If this information was deleted or misplaced please explain why. If you have already provided this information in discovery please explain what documents you submitted.

99. Does PPL provide you an email service with an email address? Please provide your company email address. Please provide all emails to and from Nieves Abad. If this information was deleted or misplaced please explain why. If you have already provided this information in discovery please explain what documents you submitted.

100. Please provide all emails between yourself and other PPL employees, subcontractors or supervisors regarding matters in this complaint that are not privileged. If this information was deleted or misplaced please explain why. If you have already provided this information in discovery please explain what documents you submitted.

101. Have you ever sent or received a fax regarding this complaint? If this information was deleted or misplaced please explain why. If you have already provided this information in discovery please explain the documents you submitted.

102. Have you received any other information through memo, notes, or documentation about matters in this complaint that is not privileged. If this information was deleted or misplaced please explain why. If you have already provided this information in discovery please explain what documents you submitted

26. Pursuant to Section 5.321(c) of the Commission's regulations, a party may obtain discovery of any matter not privileged that is relevant to a pending proceeding and that is reasonably calculated to lead to the discovery of admissible evidence. 52 Pa. Code § 5.321(c).

27. However, Section 5.361(a) of the Commission's regulations prohibits discovery which

would “cause unreasonable annoyance, embarrassment, oppression, burden or expense to the deponent, a person or party” or “would require the making of an unreasonable investigation by the deponent, a party or witness.” Id. § 5.361(a)(2), (4).

28. PPL Electric objects to Rosato Set II, Nos. 1 through 102, on the grounds that these requests seek information that is not relevant, is duplicative, and/or not reasonably calculated to lead to the discovery of admissible evidence. The Complainant has repeatedly asked for information related to unidentified work orders, the response to incidents at the Complainant’s property, PPL Electric Employees’ visits and notes related to the property, invoices rendered by PPL Electric, training and standard practices employed by PPL Electric, and PPL Electric’s interpretations of written documents and answers already provided throughout this discovery process. To the extent that this information was not previously provided, it is because PPL Electric does not have more information to share, or properly objected to similar previous requests. As discovery is ongoing, PPL Electric will supplement the response to this request.

29. PPL Electric further objects to the entirety of Rosato Set II because the requests are designed to unreasonably annoy, harass, and create unreasonable burden and expense to PPL Electric.

30. Similarly, PPL Electric objects to the entirety of Rosato Set II because it is sought in bad faith. Indeed, as evidenced by the August 13, 2024, Order Clarifying Scope of Proceedings and Granting in Part and Denying in Part, Complainant’s Motion to Compel, the sole issue to be litigated in this proceeding is whether PPL Electric has provided unreasonable service to the Complainant for allegedly failing to relocate certain utility poles on or near his property at his

request. Inquiries regarding PPL Electric's vegetation management practices, training, site visits to analyze the condition of the disputed poles, among other things, are clearly outside the bounds of the scope of this proceeding and, in turn, are irrelevant. These requests are sought in bad faith, evidenced by the extremely voluminous sets of discovery propounded by the Complainant throughout this proceeding that is limited in scope. As to Mr. Rosato, this is the Complainant's second written deposition.

31. Moreover, and critically, the Company advised the Complainant that Mr. Rosato retired from the Company effective January 1, 2025, in response to the Complainant's Written Deposition – John Rosato Set I, served on January 16, 2025. Thus, the Complainant has been on notice that Mr. Rosato no longer is employed by PPL Electric, yet, made 102 individual requests directed at Mr. Rosato, several with multiple subparts, after being advised of the same. This is evidence of bad faith.

II. CONCLUSION

WHEREFORE, PPL Electric Utilities Corporation objects to the January 21, 2025 Depositions, in their entirety, on the grounds that they are not relevant, vague, overly broad, unduly burdensome, duplicative, an improper use of discovery, sought in bad faith, designed to unreasonably annoy, harass, and cause expense and burden for PPL Electric Utilities Corporation, and/or not reasonably calculated to lead to the discovery. Moreover, PPL Electric Utilities Corporation reserves the right to object to future requests for interrogatories, requests for admissions, requests for written depositions, and requests for production of documents, including any instructions and definitions contained therein.

Respectfully submitted,

Kimberly A. Klock (ID # 89716)
Michael J. Shafer (ID # 205681)
PPL Services Corporation
645 Hamilton Street, Suite 700
Allentown, PA 18101
Phone: 610-774-2599
Fax: 610-774-4102
E-mail: kklock@pplweb.com
mjshafer@pplweb.com

Post & Schell, P.C.
Nicholas A. Stobbe (ID #329583)
Post & Schell, P.C.
17 North Second Street, 12th Floor
Harrisburg, PA 17101-1601
Phone: 717-731-1970
Email: nstobbe@postschell.com



Devin T. Ryan (ID # 316602)
Post & Schell, P.C.
One Oxford Centre
310 Grant Street, Suite 3010
Pittsburgh, PA 15219
Phone: 717-612-6052
E-mail: dryan@postschell.com

Peter J. Kramer (ID # 331797)

Three Logan Square
1717 Arch Street
24th Floor
Philadelphia, PA 19103
Phone: 215-587-1075
Email: pkramer@postschell.com

Dated: January 31, 2025

Attorneys for PPL Electric Utilities Corporation

APPENDIX B

Nicholas A. Stobbe

nstobbe@postschell.com
717-612-6033 Direct
717-731-1985 Direct Fax
File #: 205250

February 7, 2025

VIA E-MAIL (MARTJUA3@AOL.COM) AND FIRST-CLASS MAIL

Nieves Abad
747 Delaware Street
Forest City, PA 18421

Re: Nieves Abad v. PPL Electric Utilities Corporation
Docket No. C-2024-3047163

Dear Mr. Abad:

Attached are the Objections of PPL Electric Utilities Corporation to the request for Written Deposition of Michael Shaffer – Set I.

Copies will be provided as indicated on the Certificate of Service.

Respectfully submitted,



Nicholas A. Stobbe

NAS/dmc
Attachments

cc: Rosemary Chiavetta, Secretary (*Filing Letter and Certificate of Service only*)
Certificate of Service

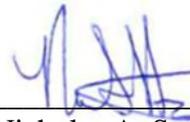
CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been served upon the following persons, in the manner indicated, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

VIA EMAIL AND FIRST-CLASS MAIL

Nieves Abad
747 Delaware Street
Forest City, PA 18421
Martjua3@aol.com

Date: February 7, 2025



Nicholas A. Stobbe



Commonwealth of Pennsylvania
Pennsylvania Public Utility Commission
 Harrisburg, PA 17105-3265
EFILING - FILING DETAIL

Date Created	Filing Number
2/7/2025	2715065

Your filing has been electronically received. Upon review of the filing for conformity with the Commission's filing requirements, a notice will be issued acknowledging acceptance or rejection (with reason) of the filing. The matter will receive the attention of the Commission and you will be advised if any further action is required on your part.

The date filed on will be the current day if the filing occurs on a business day before or at 4:30 p.m. (EST). It will be the next business day if the filing occurs after 4:30 p.m. (EST) or on weekends or holidays.

Docket Number: C-2024-3047163

Case Description:

Transmission Date: 2/7/2025 11:32 AM

Filed On: 2/7/2025 11:32 AM

eFiling Confirmation Number: 2715065

File Name	Document Type	Upload Date
PPL -Abad Nieves - Filing Letter and COS for Objection to Written Deposition.pdf	Certificate of Service	2/7/2025 11:32:18 AM

For filings exceeding 250 pages, the PUC is requiring that filers submit one paper copy to the Secretary's Bureau within three business days of submitting the electronic filing online. Please mail the paper copy along with copy of this confirmation page to Secretary, Pennsylvania Public Utility Commission, 400 North Street, Harrisburg PA 17120 a copy of the filing confirmation page or reference the filing confirmation number on the first page of the paper copy.

No paper submission is necessary for filings under 250 pages.

You can view a record of this filing and previous filings you have submitted to the PUC by using the links in the Filings menu at the top of the page. Filings that have been submitted within the last 30 days can be viewed by using the Recent Filings link. Older filings can be viewed by using the search options available in the Filing History link.

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Nieves Abad,	:	
	:	
Complainant,	:	
	:	
v.	:	Docket No. C-2024-3047163
	:	
PPL Electric Utilities Corporation,	:	
	:	
Respondent.	:	

**OBJECTIONS OF PPL ELECTRIC UTILITIES CORPORATION TO THE
REQUEST FOR WRITTEN DEPOSITION DIRECTED AT MICHAEL SHAFFER OF
NIEVES ABAD**

Pursuant to 52 Pa. Code § 5.342(c), PPL Electric Utilities Corporation (“PPL Electric” or the “Company”), by and through its attorneys, hereby serves these objections to the request for written deposition of Nieves Abad (“Complainant”), directed at Michael Shaffer, served on January 28, 2025, via email (“Shaffer Deposition”).

As explained below, PPL Electric objects to the entirety the Shaffer Deposition as the requests therein are not relevant, or are vague, overly broad, unduly burdensome, duplicative, and an improper bad-faith use of discovery not likely to lead to the discovery of admissible evidence. Furthermore, PPL Electric submits that these requests are designed to unreasonably annoy, harass, and caused unreasonable expense and burden on the part of PPL Electric.

Importantly, the Complainant has now served upon PPL Electric more than 20 sets of discovery in the form of interrogatories, requests for production of documents, and written depositions. Many of these sets of discovery have consisted of a large volume of questions – some more than 100 individual requests, including the Shaffer Deposition – and many of which containing multiple subparts. PPL Electric generally objects to the Complainant’s continued abuse

of the discovery process in this matter as the Complainant is continuing to seek discovery or depositions that are: (1) sought in bad faith; (2) designed to cause unreasonable annoyance and to unreasonably harass; and (3) designed to unreasonably burden and expense PPL Electric. 52 Pa. Code § 5.361(a). Beyond these general objections, PPL Electric also objects to the entirety of the Shaffer Deposition insofar as the requests therein are irrelevant, vague, overly broad, unduly burdensome, are duplicative. Moreover, many of the questions in the Shaffer Deposition have also been directed at other PPL Electric employees in previous sets of discovery. The Complainant's repeated attempts to ask multiple PPL Electric personnel or former personnel the same question and request the same documents is further evidence that the Complainant's conduct, in discovery generally, is sought in bad faith and levied in an attempt to unreasonably annoy and harass the Company.

This is particularly clear through the Complainant's requests for certain contact information from the personnel or former personnel that he directs written depositions to, including cellphone numbers and email addresses. PPL Electric notes that the Shaffer Deposition contains several numbering inaccuracies. For the purposes of these objections, PPL Electric objects to the entirety of the Shaffer Deposition as it is presented chronologically, which may not precisely mirror the numbering method used by the Complainant.

In support, PPL Electric states as follows:

I. SPECIFIC OBJECTIONS

A. OBJECTIONS TO ABAD REQUEST FOR WRITTEN DEPOSITION – SHAFER SET I

1. Shaffer Deposition, Nos. 1 through 105, request the following:

1. Have you physically viewed pole # 57316N46296 in the claim of Nieves Abad? If so please provide a detailed report of the findings on this pole. If not, please explain why you did not physically view this pole.

- A. Please provide a description of this pole?
 - B. What condition is this pole in?
 - C. Did you view the pole number plate on this pole?
 - D. Did you take any pictures of this pole?
 - E. Do you have any notes or other documents on this pole?
2. Have you physically viewed pole # 57334N42685 in the claim of Nieves Abad? If so please provide a detailed report of the findings on this pole. If not, please explain why you did not physically view this pole.
- A. Please provide a description of this pole?
 - B. What condition is this pole in?
 - C. Did you view the pole number plate on this pole?
 - D. Did you take any pictures of this pole?
 - E. Do you have any notes or other documents on this pole?
3. Have you physically viewed pole # 57320N46302 in the claim of Nieves Abad? If so please provide a detailed report of the findings on this pole. If not, please explain why you did not physically view this pole.
- A. Please provide a description of this pole?
 - B. What condition is this pole in?
 - C. Did you view the pole number plate on this pole?
 - D. Did you take any pictures of this pole?
 - E. Do you have any notes or other documents on this pole?
4. Have you physically viewed pole # 57339N46273 in the claim of Nieves Abad? If so please provide a detailed report of the findings on this pole. If not, please explain why you did not physically view this pole.
- A. Please provide a description of this pole?
 - B. What condition is this pole in?
 - C. Did you view the pole number plate on this pole?
 - D. Did you take any pictures of this pole?
 - E. Do you have any notes or other documents on this pole?
5. Have you physically viewed pole # 57327N46297 in the claim of Nieves Abad? If so please provide a detailed report of the findings on this pole. If not, please explain why you did not physically view this pole.
- A. Please provide a description of this pole?
 - B. What condition is this pole in?

- C. Did you view the pole number plate on this pole?
 - D. Did you take any pictures of this pole?
 - E. Do you have any notes or other documents on this pole?
6. Have you physically viewed pole # 57317N46297 in the claim of Nieves Abad? If so please provide a detailed report of the findings on this pole. If not, please explain why you did not physically view this pole.
- A. Please provide a description of this pole?
 - B. What condition is this pole in?
 - C. Did you view the pole number plate on this pole?
 - D. Did you take any pictures of this pole?
 - E. Do you have any notes or other documents on this pole?
7. On 04/13/2023 ,You arrived on complainants property after being dispatched for damaged PPL utility poles and wires. Please describe the scene when you arrived at 837 Rear Capouse Ave, Scranton PA 18509.
8. Please describe the entire role you played during this incident and how long were you on the scene?
9. What work was needed to be done to repair utility pole #57334N42685 to fix the problem ? Please explain the steps that were taken to repair.
10. What work was needed to be done to repair utility pole #57320N46302 to fix the problem ? Please explain the steps that were taken to repair.
11. What work was needed to be done to repair utility pole # 57339N46273 to fix the problem ? Please explain the steps that were taken to repair.
12. What work was needed to be done to repair utility pole # 57327N46297 to fix the problem ? Please explain the steps that were taken to repair.
13. What work was needed to be done to repair utility pole # 57317N46297 to fix the problem ? Please explain the steps that were taken to repair.
14. Have you ever done a repair to utility pole # 57334N42685 or the wires attached to this pole on complainants property, for another incident during your career? Please include the date, what was done to resolve this issue or any other documentation you may have about the issue resolved or unresolved.
15. Have you ever done a repair to utility pole # 57320N46302 or the wires attached to this pole on complainants property, for another incident during your career? Please include

the date, what was done to resolve this issue or any other documentation you may have about the issue resolved or unresolved.

16. Have you ever done a repair to utility pole # 57339N46273 or the wires attached to this pole on complainants property, for another incident during your career? Please include the date, what was done to resolve this issue or any other documentation you may have about the issue resolved or unresolved.
17. Have you ever done a repair to utility pole # 57327N46297 or the wires attached to this pole on complainants property, for another incident during your career? Please include the date, what was done to resolve this issue or any other documentation you may have about the issue resolved or unresolved.
18. Have you ever done a repair to utility pole # 57317N46297 or the wires attached to this pole on complainants property, for another incident during your career? Please include the date, what was done to resolve this issue or any other documentation you may have about the issue resolved or unresolved.
19. Have you ever done a repair to utility pole # 57316N46296 or the wires attached to this pole on complainants property, for another incident during your career? Please include the date, what was done to resolve this issue or any other documentation you may have about the issue resolved or unresolved.
20. How many spans of utility wire was needed to repair the damage to PPL Distribution System? Please list what overhead utility lines needed to be replaced.
21. Was there damage to the electrical service of any residential structure as a result of this incident? Please list what structures were damaged and what was needed for each structure to be replaced in order for power to be restored to their residences.
22. Was there power loss to any residential units in the area as a result of this incident? Please list all units that were without power, and the duration of the power loss.
23. How did you keep notes or input data for information about this incident? Please submit all documentation about this incident, if you provided this information in discovery please explain what notes you provided.
24. Did you have Mobile Operations Management Software (MOM) to take notes or input data, if so please answer and include all documents that are not privileged. Please include any information regarding this incident that you have not submitted during discovery, If you have already included these documents in discovery please list what documents you have included.

25. Has there been any documents or other evidence you have not submitted due to them being privileged that I have requested from you? Please provide how many documents or evidence you are withholding and provide what category of privilege they fall under.
26. If you did not use the Mobile Operations Management Software (MOM) to input data, what system did you use? Please list the system you use and provide documents. If you have already included these documents in discovery please list what documents you have included.
27. How many PPL employees were needed to resolve this incident?
28. Please list each employee's name, job title and business address of each employee involved in resolving this incident while you were on site on 04/13//2023.
29. Please list each employee that was on scene in resolving this incident on 04/13/2023 while you were on site?
30. Who was supervisor on 04/13/2023? Please list name, job title, and business address.
31. On 04/13/23, the day of the incident, was your supervisor on site of this accident located at 837 Rear Capouse Ave, Scranton Pa 18509 while you were present?
32. Did you need assistance in any way from Tom Kernoschak to resolve issues for this incident? If yes, please list what assistance you needed from Tom Kernoschak to resolve this issue.
33. Did you need assistance in any way from Daniel Walker to resolve issues for this incident? If yes, please list what assistance you needed from Daniel Walker to resolve this issue.
34. Did you need assistance in any way from Bill Farber to resolve issues for this incident? If yes, please list what assistance you need from Bill Farber to resolve this issue.
35. Please state your name and office address?¹
36. Please state your educational background including the schools you have attended, the academic and professional degrees you have received and the dates you received these degrees.

¹ The Complainant did not include a question no. 35 in the Shaffer Deposition.

37. Was this incident considered a billable event for the damage done to the utility poles and wires? Please explain why or why not.
38. What was the weather like at the time this incident took place, on 04/13/23? Please explain if it was cloudy, raining, sunny, foggy, windy or any other type of weather event when this incident occurred.
39. Were you required to cut down any trees, whether they were on the ground or standing to resolve this matter. Please list what trees were cut and how many to resolve this matter.
40. What discussions did you have with other PPL employees regarding this matter? Please list each employee and a description of the discussion.
41. Did you upload any new data into any PPL systems regarding pole number 57334N42685 for work you completed to resolve this issue?
42. Did you upload any new data into any PPL systems regarding pole number 57320N46302 for work you completed to resolve this issue?
43. Did you upload any new data into any PPL systems regarding pole 57339N46273 number for work you completed to resolve this issue?
44. Did you upload any new data into any PPL systems regarding pole number 57327N46297 for work you completed to resolve this issue?
45. Did you upload any new data into any PPL systems regarding pole number 57317N46297 for work you completed to resolve this issue?
46. Did you upload any new data into any PPL systems regarding pole number 57316N46296 for work you completed to resolve this issue?
47. When replacing utility poles and/or wires on the complainants property, did you use a PPL Utility design drawing. Please enclose and list which drawing you used to replace PPL Utilities during this incident
48. What is the distance from utility pole# 5732046302 and 20 Amity Court Scranton Pa 18509? Please explain how you came to this calculation, if you did not measure please explain why not.
49. What is the distance from utility pole# 57327N46297 and 20 Amity Court Scranton Pa 18509? Please explain how you came to this calculation, if you did not measure please

explain why not.

50. Are the utility wires between pole # 57320N46302 and 57327N46297 a safe distance from 20 Amity Court.
51. Did you place the utility wires between pole # 57320N46302 and pole # 57327N46297 while making repairs on 04/13/2025?
52. Does the utility wires between pole # 57320N46302 and # 57327N46297 block the ways of egress of the second story windows at 20 Amity Court Scranton Pa 18509?
53. How far are utility wires that run between pole # 57320N46302 and 57327N46297 from 20 Amity Court, Scranton Pa 18509. Please explain how you came to this calculation, if you did not measure please explain why not.
54. Is pole # 57320N46302 on the property of Nieves Abad?
55. Is pole# 57320N46302 in a public right of way?²
56. Did you take any measurements to calculate the distance that this pole is from the property line of Nieves Abad in either direction. Please explain how you came to this calculation, if you did not measure please explain why not.
57. Have you ever performed maintenance on utility pole 57334N42685? Please provide any documentation you may have and the date this was done.
58. Have you ever performed maintenance on utility pole 57320N46302? Please provide any documentation you may have and the date this was done.
59. Have you ever performed maintenance on utility pole 57339N46273? Please provide any documentation you may have and the date this was done.
60. Have you ever performed maintenance on utility pole 57327N46297? Please provide any documentation you may have and the date this was done.
61. Have you ever performed maintenance on utility pole 57317N46297? Please provide any documentation you may have and the date this was done.
62. Have you ever performed maintenance on utility pole # 57316N46296? Please provide any documentation you may have and the date this was done.

² The Complainant did not include a question 55 in the Shaffer Deposition.

63. Have you ever performed an inspection on pole 57334N42685? Please provide any documentation you may have and the date this was done.
64. Have you ever performed an inspection on pole 57320N46302? Please provide any documentation you may have and the date this was done.
65. Have you ever performed an inspection on pole 57339N46273? Please provide any documentation you may have and the date this was done.
66. Have you ever performed an inspection on pole 57327N46297 ? Please provide any documentation you may have and the date this was done.
67. Have you ever performed an inspection on pole 57317N46297? Please provide any documentation you may have and the date this was done.
68. Have you ever performed an inspection on pole 57316N46296? Please provide any documentation you may have and the date this was done.
69. Have you ever done a visual inspection on pole #57334N42685? Please list the dates and your results for this utility pole. Please also provide any documentation you have. If no inspection was done, please explain why not.
70. Have you ever done a visual inspection on pole # 57320N46302? Please list the dates and your results for this utility pole. Please also provide any documentation you have. If no inspection was done, please explain why not.
71. Have you ever done a visual inspection on pole # 57339N46273? Please list the dates and your results for this utility pole. Please also provide any documentation you have. If no inspection was done, please explain why not.
72. Have you ever done a visual inspection on pole # 57327N46297? Please list the dates and your results for this utility pole. Please also provide any documentation you have. If no inspection was done, please explain why not.
73. Have you ever done a visual inspection on pole # 57317N46297? Please list the dates and your results for this utility pole. Please also provide any documentation you have. If no inspection was done, please explain why not.
74. Have you ever done a visual inspection on pole # 57316N46296? Please list the dates and your results for this utility pole. Please also provide any documentation you have. If no inspection was done, please explain why not.

75. Are you involved in billing for invoice # 9113002-33 that PPL is using as a part of a Tariff? Please provide all dates you provided PPL with billing information and the information you provided.
76. What training have you received from PPL for utility pole and/or utility wire inspections for an electrical distribution system? Please provide each training course, memo, booklet, classes or any other documentation for matters in this complaint that are not privileged. Please provide dates when you received training and a brief description.
77. What training have you received from PPL for utility pole or utility wire visual inspections for an electrical distribution system? Please provide each training course, memo, booklet, classes or any other documentation for matters in this complaint that are not privileged. Please provide dates when you received training and a brief description.
78. What training have you received from PPL for utility pole or utility wire maintenance inspections for an electrical distribution system? Please provide each training course, memo, booklet, classes or any other documentation for matters in this complaint that are not privileged. Please provide dates when you received training and a brief description.
79. What training have you received from PPL for utility pole or utility wire vegetation management for an electrical distribution system? Please provide each training course, memo, booklet, classes or any other documentation for vegetation management that are not privileged. Please provide dates when you received training and a brief description of the training for vegetation management.
80. Have you ever inspected a utility pole or utility wires while employed by PPL? If yes please estimate how many times. If not, please explain why not.
81. Have you ever visually inspected a utility pole or utility wires while employed by PPL? If yes please estimate how many times. If not, please explain why not.
82. Have you ever done vegetation management in a PPL right of way while employed by PPL? If yes, please estimate how many times. If not, please explain why not.
83. Have you ever performed maintenance on a utility pole or utility wires while employed by PPL? If yes please estimate how many times. If not, please explain why not.
84. After the incident on 04/13/23 did you reinforce pole # 57334N42685?

85. After the incident on 04/13//23 did you reinforce pole # 57320N46302?
86. After the incident on 04/13/23 did you reinforce pole # 57339N46273?
87. After the incident on 04/13/23 did you reinforce pole # 57327N46297?
88. After the incident on 04/13/23 did you reinforce pole # 57317N46297?
89. After the incident on 04/13/23 did you reinforce pole # 57316N46296?
90. Did you input any data into the Work & Asset Management system (WAM) during this incident or for matters in this complaint? Please provide any information you entered into the WAM system about this matter.
91. What are the current standards PPL requires for clearances of vegetation in a PPL right of way for its distribution poles and wires?
92. Is this service for your company using a cell phone from PPL or is it a personal phone? What is your company cell phone number?
93. Does PPL, the cell phone carrier, or yourself still have phone records of phone calls placed to and from Nieves Abad? Please provide this information. If this information was deleted or misplaced please explain why. If you have already provided this information in discovery please explain what documents you submitted.
94. Does PPL, the cell phone carrier, or yourself still have text messages placed to and from Nieves Abad? Please provide this information. If this information was deleted or misplaced please explain why. If you have already provided this information in discovery please explain what documents you submitted.
95. Does PPL, the cell phone carrier, or yourself still have voicemails placed to and from Nieves Abad? Please provide this information. If this information was deleted or misplaced please explain why. If you have already provided this information in discovery please provide the documents you submitted.
96. Please provide all phone records where you have conversations with other PPL employees, subcontractors, and supervisors about matters in this complaint that are not privileged. If this information was deleted or misplaced please explain why. If you have already provided this information in discovery please explain what documents you submitted.
97. Please provide all text messages where you have conversations with other PPL employees, subcontractors and supervisors about matters in this complaint that are not

privileged. If this information was deleted or misplaced please explain why. If you have already provided this information in discovery please explain what documents you submitted.

98. Please provide all voicemails where someone left you a message that was a PPL employees, subcontractors, and supervisors about matters in this complaint that are not privileged. If this information was deleted or misplaced please explain why. If you have already provided this information in discovery please explain what documents you submitted.

99. Does PPL provide you an email service with an email address? Please provide your company email address. Please provide all emails to and from Nieves Abad. If this information was deleted or misplaced please explain why. If you have already provided this information in discovery please explain what documents you submitted.

100. Please provide all emails between yourself and other PPL employees, subcontractors or supervisors regarding matters in this complaint that are not privileged. If this information was deleted or misplaced please explain why. If you have already provided this information in discovery please explain what documents you submitted.

101. Have you ever sent or received a fax regarding this complaint? If this information was deleted or misplaced please explain why. If you have already provided this information in discovery please explain the documents you submitted.

102. Have you received any other information through memo, notes, or documentation about matters in this complaint that is not privileged. If this information was deleted or misplaced please explain why. If you have already provided this information in discovery please explain what documents you submitted.

103. What company do you work for? Please submit your current employee work history at this company?

104. What is your current position at PPL Electric Utilities Corporation?

105. How long have you practiced your profession and how long have you held your current position?

2. Pursuant to Section 5.321(c) of the Commission's regulations, a party may obtain discovery of any matter not privileged that is relevant to a pending proceeding and that is reasonably calculated to lead to the discovery of admissible evidence. 52 Pa. Code § 5.321(c).

3. However, Section 5.361(a) of the Commission's regulations prohibits discovery which would "cause unreasonable annoyance, embarrassment, oppression, burden or expense to the deponent, a person or party" or "would require the making of an unreasonable investigation by the deponent, a party or witness." Id. § 5.361(a)(2), (4).

4. PPL Electric objects to the Shaffer Deposition, Nos. 1 through 105, on the grounds that these requests seek information that is not relevant, is duplicative, and/or not reasonably calculated to lead to the discovery of admissible evidence. The Complainant has repeatedly asked for information related to unidentified work orders, the response to incidents at the Complainant's property, PPL Electric Employees' visits and notes related to the property, invoices rendered by PPL Electric, training and standard practices employed by PPL Electric, and PPL Electric's interpretations of written documents and answers already provided throughout this discovery process. To the extent that this information was not previously provided, it is because PPL Electric does not have more information to share, or properly objected to similar previous requests. As discovery is ongoing, PPL Electric will supplement the response to this request.

5. PPL Electric further objects to the entirety of the Shaffer Deposition because the requests are designed to unreasonably annoy, harass, and create unreasonable burden and expense to PPL Electric.

6. Similarly, PPL Electric objects to the entirety of the Shaffer Deposition because it is sought in bad faith. Indeed, as evidenced by the August 13, 2024, Order Clarifying Scope of Proceedings and Granting in Part and Denying in Part, Complainant's Motion to Compel, the sole issue to be litigated in this proceeding is whether PPL Electric has provided unreasonable service to the Complainant for allegedly failing to relocate certain utility poles on or near his property at his request. Inquiries regarding PPL Electric's vegetation management practices, training, site

visits to analyze the condition of the disputed poles, among other things, are clearly outside the bounds of the scope of this proceeding and, in turn, are irrelevant. These requests are sought in bad faith, evidenced by the extremely voluminous sets of discovery propounded by the Complainant throughout this proceeding that is limited in scope.

II. CONCLUSION

WHEREFORE, PPL Electric Utilities Corporation objects to the Shaffer Deposition, in its entirety, on the grounds that the requests therein are not relevant, vague, overly broad, unduly burdensome, duplicative, an improper use of discovery, sought in bad faith, designed to unreasonably annoy, harass, and cause expense and burden for PPL Electric Utilities Corporation, and/or not reasonably calculated to lead to the discovery. Moreover, PPL Electric Utilities Corporation reserves the right to object to future requests for interrogatories, requests for admissions, requests for written depositions, and requests for production of documents, including any instructions and definitions contained therein.

Respectfully submitted,



Kimberly A. Klock (ID # 89716)
Michael J. Shafer (ID # 205681)
PPL Services Corporation
645 Hamilton Street, Suite 700
Allentown, PA 18101
Phone: 610-774-2599
Fax: 610-774-4102
E-mail: kklock@pplweb.com
mjshafer@pplweb.com

Nicholas A. Stobbe (ID #329583)
Post & Schell, P.C.
17 North Second Street, 12th Floor
Harrisburg, PA 17101-1601
Phone: 717-731-1970
Email: nstobbe@postschell.com

Devin T. Ryan (ID # 316602)
Post & Schell, P.C.
One Oxford Centre
310 Grant Street, Suite 3010
Pittsburgh, PA 15219
Phone: 717-612-6052
E-mail: dryan@postschell.com

Peter J. Kramer (ID # 331797)
Post & Schell, P.C.
Three Logan Square
1717 Arch Street
24th Floor
Philadelphia, PA 19103
Phone: 215-587-1075
Email: pkramer@postschell.com

Dated: February 7, 2025

Attorneys for PPL Electric Utilities Corporation