

February 7, 2025

To: Secretary
Pennsylvania Public Utility Commission
400 North Street
Harrisburg, PA 17120

RCVD PUC SEC BUR
FEB 11 2025 AM 10:48

From: Deborah Yaegle
102 Merchant Road
Warren, PA 16365
814-558-0601

Re: Docket # C-2025-3052971

Dear Secretary of the Pennsylvania Public Utility Commission,

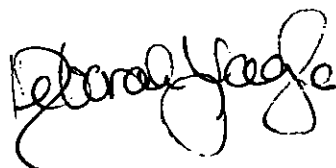
Enclosed are several documents of statements in response to the Respondent's submission of Preliminary Objections and New Matter in the formal complaint filed with the above Docket Number.

This letter is mailed to you via USPS service, on the date of February 7, 2025. In addition, as required, I have provided to the Respondent's a copy of my responses on their Preliminary Objections and New Matter. The mode of service to the Respondent's is via email to the attention of Margaret A. Morris.

Thank you for your attention and concern in this matter of a formal complaint filed with the PAPUC.

Respectfully,

Deborah Yaegle



February 7, 2025

FORMAL COMPLAINT OF DEBORAH YAEGLE vs PENELEC / FIRST ENERGY DOCKET # C-2025-3052971

ANSWERS TO PENELEC'S PRELIMINARY OBJECTIONS FILED ON 02/05/2025

ANSWERS TO THE NEW MATTER FILED BY FIRST ENERGY PENNSYLVANIA ELECTRIC COMPANY

NEW MATTER ADDRESSED TO PAPUC ON FORMAL COMPLAINT FILED BY DEBORAH YAEGLE

Claimant Deborah Yaegle's OBJECTIONS / RESPONSE to Penelec's Preliminary Objections Statement

Respondent avers that the subject of the Formal Complaint "is beyond the jurisdiction" of the PAPUC. I respectfully argue against the respondent claiming that an "impertinent matter" is the basis of the formal complaint. The formal complaint is filed in wholeness of the complaint. Without addressing every matter of what transpired on 12/20/2024, when Penelec instilled a powerful, unwarranted, sudden "overload voltage surge" in restoring electrical power, the complaint would not be fully factual and would lack transparency of the total truth of the recklessness of the power company in providing safe, efficient electricity to not only my residence, but also to the surrounding neighborhoods. The overload of voltage was above and beyond safe circuit voltage.

I object to any of the statements of the formal complaint I filed not being addressed in their entirety by the PAPUC. The complaint is based on facts that the PAPUC has authority to address.

The PAPUC website states the PUC has "jurisdiction over 11 electric distribution companies." www.puc.pa.gov/ ConsumerEd@pa.gov. The PUC's Mission is stated to include that it "is to ensure safe and reliable service" and at reasonable rates. *It is noted Penelec had a rate increase to consumers as of January 1, 2025, per recent billing of services. I am not aware of being offered an opinion to object on a rate increase by Penelec.

The entirety of the formal complaint, Docket # C-2025-3052971, is based on knowledge of what transpired by Penelec's negligence on 12/20/2024 and attempts to eliminate any information would be a complete injustice.

1. While the formal complaint does mention "damages" to my property (letter to PUC dated 01/01/2025), the complaint is of extremely more importance than the property damages. The context of the letter is quite clear; it lists facts, dates, and exact times of how those damages occurred as the result of Penelec's overload voltage surge on 12/20/2024. An administrative judge is being asked to examine the formal complaint as it was filed; and not permit the wording of the complaint to be dissected and dismantled to suit the Respondent's wishes of evidence not being entered.
2. Respondent requests expressly that this consumer not be permitted to enter testimony or exhibits of any evidentiary "alleged damages." It is understandable that the electrical power company, who is at fault for an overload electrical power surge on 12/20/2024, does not want the entire truth of complaint to be addressed to the Pennsylvania Utility Commission. However, the complaint is absolutely the truth of how this consumer suffered the negligence of Penelec / First Energy. The only authority, I am aware of, that governs this power company and can place demands for a full investigation against the power company is the PA PUC. A letter from Cara Warren, of Penelec, dated December 31, 2024, in regards to a claim filed against Penelec, states "As a result of an investigation conducted in this matter, there is no evidence of any improper conduct on the part of Penelec or its employees."
 - The "investigation" (and this consumer questions such a statement) would be strictly biased on the part of Penelec. The company offered NO evidence that they are not at fault. Respondent is evading the truth of facts by demanding evidence and testimony not be permitted by this or any consumer.

3. Respondent requests that the PUC “grant the Company such other relief...” This Pennsylvania consumer requests the PA PUC grant a full investigation, unbiased, ethically sound, and thorough to protect every consumer who pays money for electrical service to the company of Penelec / First Energy.

Procedural Background of the energy company response to the PA PUC / CLIAMNANT'S RESPONSE

The damages of what transpired on 12/20/2024 are more alarming and concerning than the mere fact that I addressed what the physical loss of financial costs occurred at this consumer's residence. I understand that the PA PUC may not “grant” the financial loss costs be ordered; BUT the complaint, again, is an entirety of a fact-based formal complaint of the unsafe and unreliable service provided by Penelec, beginning on the date of December 20, 2024. The service was UNSAFE, it caused physical damage, emotional distress, and fear for my safety and my domestic animals' safety. The formal complaint deserves justice from the PA PUC, to prevent the company from continuing their unsafe practice of how electrical power is restored or turned on after an outage. Otherwise, every consumer and customer of Penelec is in danger of experiencing unsafe voltage surges, and financial losses which will be quickly dismissed by Penelec's claim representatives.

The Pennsylvania Public Utilities Commission (PUC) falls within the definition of tribunal under 42 Pa. Cons. Stat 5103(d). This section defines “tribunal” as a court... or other judicial officer of the Commonwealth vested with power to enter an order in a matter. The statute includes in this classification “the Board of Claims, the Board of Property, the Office of Administrator for Arbitration Panels...”

The PUC also shares statewide jurisdiction with the courts over subjects which are in other instances within the court's original jurisdiction. *Barner, 537 A. 2d at 926 (Cmmwlth.Ct.1988)*.

“if an appeal or other matter is taken to, brought in, or transferred to a division of a court to which such matter is not allocated by law, the court shall not quash such appeal or dismiss the matter, but shall transfer the record thereof to the proper division of the court, where the appeal of other matter shall be...” 5103.Title 42 - PA General Assembly!

The respondent addressing this formal complaint (Reger Rizzo Darnall LLP) filed a response with the Secretary, PA Public Utility Commission, via electronic filing, a very similar response, in Docket No. C-2022-303448. Carmella Chianese v. Pennsylvania Power Company.

Under due process of the law, and jurisdiction of the PA PUC, this consumer requests full knowledge of the formal complaint be addressed by the PA PUC, at the initial level the complaint was filed with: The Secretary of the Public Utilities Commission. Dismissing any part of the formal complaint at the request of the Respondent would most clearly be an injustice.

This consumer objects to the mere suggestion of the Respondent that the formal complaint contains “scandalous or impertinent matters.” Paragraph 9, page 3 of Respondent's response. Again, Respondent focuses their sole attention on the formal complaint bearing facts of truth that physical damage was caused by the electrical company's “overload power surge” on December 20, 2024. The formal complaint is complex but thoroughly stated; focusing on the physical damages that are listed in the complaint is **not** the “BASIS OF THE COMPLAINT” but rather a triggering consequence of the negligence of Penelec.

I, Deborah Yaegle, did not claim a “breach of contract” but I did claim unsafe, unreliable electrical service was instilled on 12/20/2024. Not only to my residence, but to MANY others, including neighbor Mr. Dean McKibbin at 104 Merchant Road, Warren, PA 16365. It also affected, per the Penelec Lineman who arrived at my property on 12/20/2024, many customers / consumers at the Irvinedale Trailer Park, and a consumer who

followed the Penelec lineman's truck to 102 Merchant Road, Warren, PA and (complained to the lineman in my presence) reported their "mother was without furnace heat" after Penelec restarted power. The time was approximately 6:30pm, more than 8 (eight) hours after Penelec instilled an electrical overload power surge to their customers. For the record, the winter weather was very cold on 12/20/2024 and a person's life would be in jeopardy if they did not have a heat source in their home. An investigation by the PA PUC in this matter is more than necessary, it should be demanded that Penelec furnish the information of the voltage instilled, the neighborhoods affected by the overload surge, the number of complaints voiced by customers on 12/20/2024 to Penelec, and testimony of the lineman who furnished information to me on 12/20/2024. Respectfully, I ask PA PUC conduct a survey of the consumers / customers affected by the Penelec's service on 12/20/2024. To my knowledge, the PA PUC has the jurisdiction and authority to investigate the electrical company's service, not only for proficiency of service, but for customer safety reasons.

Respondent states in Paragraph 13, page 4, "A prayer for damages..." is "impertinent matter." The Respondent requests the PA PUC to not address the matter. The PUC shares statewide jurisdiction with the courts, and has the authority to address the matter, hold a preliminary hearing on the matter, and write an Interim Order dismissing the Preliminary Objections of this Respondent. Striking or dismissing a formal complaint benefits one party: the electrical company of Penelec. It is a injustice to this longstanding consumer and customer of Penelec, that the Respondents attempt to diminish and quash the voice of justice in their argument regarding the formal complaint filed against Penelec / First Energy.

At least 9 (nine) calls were addressed by this consumer to Penelec on 12/20/2024; as the formal complaint states. The complaint addressed a "concern on safety of electrical voltage." The power surge of electricity triggered an event on 12/30/2024, in which a delivery truck service was delivering new merchandise that was "destroyed" by the overload power surge of 12/20/2024. The delivery truck service backed directly into electrical wires that are connected to a "much tilted electrical pole at the corner of Hummingbird Lane and Merchant Road" and to the mast pole attached to my home's roof at 102 Merchant Road, Warren, PA.

Today, those electrical wires remain too low to the ground. The delivery truck service caused extensive damage to the electrical pole, electrical meter box, mast, weatherhead; and even ripped the outer coating of the electrical wires (now hanging lowly over my driveway). The latter is the sole responsibility of Penelec.

After February 7, 2025, I must file with the District Magistrate, a court procedure against the delivery, truck service. For the record, I have a 24-hour camera surveillance on my property. The entire fault of the matter not only lies within the delivery truck service; but with Penelec, as they unsafely and negligently instilled an overload voltage surge on December 20, 2024. The formal complaint, in its entirety, states facts, evidence, truths of how the completely unsafe voltage surge still affects this consumer today, in a most negative way. It is all pertinent, and I request the matter be addressed, in full, by the PA PUC, who has jurisdiction to hear the matter and address it accordingly to their power!

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Deborah Yaegle
102 Merchant Road
Warren, Pennsylvania 16365

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Secretary
Pennsylvania Public Utility Commission
400 NORTH ST.
Harrisburg, PA 17120

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