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BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

Nieves Abad  
(Pro-Se)

Complainant

VS

PPL Electric Utilities Corporation

C-2024-3047163

Respondent

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**RE: Nieves Avad V, PPL Electric Utilities Corporation**  
**Docket No. C-2024-3047163**

To Whom This May Concern,

Attached for filing is Nieves Abad Answers To PPL's Preliminary Objections of The Amended Formal Complaint served Upon Respondent by Nieves Abad in the Above-referenced proceeding. Copies will be provided as indicated on the Certificate of Service.

Alphonso Arnold III  
Administrative Law Judge  
400 North St  
Harrisburg, PA 17120  
Pennsylvania Public Utility Commission  
Email-Alphoarno@pa.gov

  
Nieves Abad  
747 Delaware St  
Forest City , PA 18421  
Email- [Martjua3@aol.com](mailto:Martjua3@aol.com)  
Phone - 631-575-2348  
Dated- February 28, 2025

Rosemary Chiavetta  
400 North Street, 2nd Floor North  
P.O BOX 3265  
Harrisburg, PA 17105-3265

Peter J Kramer Esquire  
Post & Schell  
Three Logan Square  
1717 Arch Street  
24th Floor  
Philadelphia, PA 19103

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BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

Nieves Abad  
(Pro-Se)

Complainant

CERTIFICATE OF SERVICE

VS

PPL Electric Utilities Corporation

C-2024-3047163

Respondent

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**CERTIFICATE OF SERVICE**

I, Nieves Abad, hereby certify that I served Nieves Abad Answers To PPL's Preliminary Objections of The Amended Formal Complaintnew matters to Respondent via certified mail this 28th day of February 2025, addressed as follows; 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.

CC:

Alphonso Arnold III  
Administrative Law Judge  
Office of Administrative Law Judge  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
Email- [alphonarno@pa.gov](mailto:alphonarno@pa.gov)

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

RE: Nieves Abad (Pro-Se) VS PPL Electric Utilities Corporation  
Docket No. C-2024-3047163

To The Secretary Of The Commission,

I am enclosing herein one copy of Certificate Of Service evidencing the service for  
Complainant's Nieves Abad Answers To PPL's Preliminary Objections of The Amended Formal  
Complaint

By copy of this correspondence directed to Respondent I am serving him with a copy of the  
same

Thank you for your cooperation.

CC:

Alphonso Arnold III  
Administrative Law Judge  
Office of Administrative Law Judge  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street  
Harrisburg PA 17120  
Phone 717.787.3868  
Email- alphonarno@pa.gov

Peter J Kramer Esquire  
Post & Schell  
Three Logan Square  
1717 Arch Street  
24th Floor  
Philadelphia, PA 19103

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Nieves Abad  
747 Delaware St  
Forest City , PA 18421  
Email- Martjua3@aol.com  
Phone - 631-575-2348  
Dated- February 28,2025



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BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

Nieves Abad :  
(Pro-Se) :  
Complainant : Answer To Preliminary Objections  
:  
vs. :  
:  
:  
PPL Electric Utilities Corporation :  
Respondent : **Docket No. C-2024-3047163**

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**Nieves Abad Answers To PPL Preliminary Objections To The Amended Formal Complaint**

**TO THE PENNSYLVANIA PUBLIC UTILITY COMMISSION:**

Nieves Abad,(hereon in Complainant),hereby files this Answer To PPL's Preliminary Objections To The Amended Formal Complaint Of Nieves Abad pursuant The Public Utility Commission(hereon in PUC) rules and regulations title 52 Chapter 5 Section 5.101(F) against PPL Electric Utility Corporation(hereon in PPL) in front of the Honorable Administrative Law Judge Alphonso Arnold(hereon in ALJ) states the following;

**A. PPL'S PRELIMINARY OBJECTION NO. 1: The Complainant Has Not Complied With The Minimum Requirements For An Amended Complaint And, Therefore, Fails To Provide Reasonable Notice Of The Claims He Intends To Pursue In This Case Contrary To Fundamental Principles Of Due Process (52 Pa. Code § 5.101(a)(2))**

On 01/06/25, Complainant filed a motion of notice to amend. In this notice the Complainant seeks to amend, modify, and supplement the original formal complaint. The brief was sent to PPL attorneys Post & Schell by email and certified mail. In this notice to amend all issues being brought against PPL and relief sought was disclosed to PPL. ( See Notice To Amend of Nieves Abad). On 01/27/25, PPL filed answers to the motion of notice to amend that denied allegations in the notice and ask the ALJ to deny this notice to amend. On 01/29/25, ALJ granted a motion of notice to amend. On 01/31/25, Complaint filed an amended formal complaint with PPL via PPL's attorneys Post & Schell via email and certified mail. On 02/20/25, PPL responded with answers and preliminary objections to the amended formal complaint. PPL has been notified of the exact subject matter of the amended formal complaint since 01/06/25. The rules set forth under Title 52 Chapter 5 Section 5.91(a), (b), & ( c ) that are under the jurisdiction of the PUC and mirror similar practices used by civil procedure law under rule 1033(D). The ALJ has ruled the requirements of the amended formal complaint in the order granting the notice to amend on 01/29/25.

“The Commission’s regulations proceed to place the following limitations on a party’s ability to amend a pleading:

Limitation. Except as otherwise provided in this subchapter, no amendment to a pleading may be filed within 5 days preceding the commencement of or during a hearing unless directed or permitted by the Commission or the presiding officer after opportunity for all parties to be heard thereon. 52 Pa. Code § 5.91(c).

Mr. Abad did not need to seek my permission through his Motion to amend his Complaint. If Mr. Abad wishes to amend his Complaint, he may simply do so, as long as his

Amended Complaint complies with the Commission's regulations, cited above. Mr. Abad's Motion will be granted in the Ordering paragraphs below, to the extent that the Motion requests permission to amend the Formal Complaint. Any allegations that Mr. Abad wishes to raise against PPL that were not raised in the Formal Complaint and must be raised in the Amended Complaint when filed."

Complainant filed the original formal complaint on 03/07/23, with the PUC and PPL. This complaint included allegations of five PPL owned utility poles on the Complainants property which were neglected by PPL and caused put the public and the Complainant safety at risk, caused property damage, and power outages in violation of title 66 chapter 15 section 1501 Characters or service and facilities for a Electrical Distribution Company operating in the State Of Pennsylvania (hereon in PA).

**Section 5.91 - Amendments of pleadings generally(a)**

*Generally.* A modification of or supplement to an application, complaint, petition or other pleading shall be deemed as an amendment to the pleading, and must comply with the requirements of this subchapter relating to the pleading amended.

Code indicates that a modification or supplement to an application to a complaint will be deemed as an amendment. The matters in Complainants amended formal complaint are filed in accordance with the above code. Every section of the amended formal complaint is direct subject matter of the original formal complaint which is that PPL is in violation of Title 66 Chapter 15 Section 1501. PPL has put the Complainants safety at risk with PPL owned utility poles in an alleged PPL Right Of Way (hereon in ROW). After further investigation the Complainant has found ten other poles new to this Complaint that PPL is also in violation of Title 66 Chapter 5 Section 1501. These ten poles that are listed in the amended formal complaint are located on the only two roads that lead to the Complainants property from the main road. The Complainant, his family, and the public travel this road by car, bicycle, and/or by foot everyday. The Complainant accesses his property from 8:00 a.m to 8:00 pm on a daily basis. Complainant

uses this road to access his property, go to the store, pick up children from school and do day to day chores and activities. PPL's negligence and current state of PPL utilities has compromised the safety of the Complainant, his family and the public.

**§ 5.22. Content of formal complaint.**

**(4) The interest of the complainant in the subject matter—for example, customer, competitor, and the like.**

The amended formal complaint is clear. Nieves Abad is a customer of PPL who's service address is 837 Rear Capouse Ave, Scranton Pa 18509 (hereon in Complainant's property). Complainant, his family, and members of the public use Green Place and Amity Court to access the Complainant's property. PPL owned utility poles, wires and utility pole design for the utilities in this Complaint, has put the Complainants safety at risk. In the answers of PPL to the amended formal Complaint of Nieves Abad, PPL has admitted to three accidents involving PPL owned utilities and the Complainant.

**§ 5.22. Content of formal complaint.**

**(5) A clear and concise statement of the act or omission being complained of including the result of any informal complaint or informal investigation.**

PPL is in violation of all statutes of PA state law listed in the amended formal complaint of Nieves Abad. In particular PA title 66 chapter 15 section 1501. This happened through the negligence of PPL's action and inactions during the course of years that lead to three accidents in 2023 and continues to put the Complainants safety at risk. The acts described in sections 1 through 11 of the amended formal complaint of Nieves Abad and leads to the Complaint asking for the relief requested in section 12 of the amended formal complaint of Nieves Abad.

**§ 5.22. Content of formal complaint.**

**(6) A clear and concise statement of the relief sought**

The acts described in sections 1 through 11 of the amended formal complaint of Nieves Abad and leads to the Complaint asking for the relief requested in section 12 of the amended formal complaint of Nieves Abad.

**B. PPL'S PRELIMINARY OBJECTION NO. 2: The Amended Complaint Fails To Provide Reasonable Or Adequate Specificity With Regard To Alleged Violations Of The Public Utility Code And The Commission's Regulations (52 Pa. Code § 5.101(a)(3))**

PPL has failed to maintain record, PPL employees are not properly trained and/or do not practice adequate record keeping to comply with title 52 chapter 57 section 57.45, title 52 chapter 57 section 57.198, or the most recent publications of the national associates of regulatory utility commissions ( hereon in NARUC published October 2007 entitled "Regulations to govern the preservation of Records of electric, gas and water utilities." In the amended formal complaint of Nieves Abad the incomplete, missing, or inaccurate record keeping of PPL is listed:

1. Work orders, 2. Incident Reports, 3. Call center data, 4. Utility Pole Data, 5. Utility wire data, 6. PPL utility and wire inspection data. 7. Utility wire and pole maintenance data, 8. PPL's vegetation management data for its right of way, and 9. Storm damage data for the utilities in this complaint. PPL and PPL employees have admitted through discovery that PPL lacks this data or it does not exist.

Complainant goes on further to explain how not having these records is a safeguard to prevent accidents. By not having this data PPL has put the Complainants safety at risk of accident by PPL owned utilities in this complaint. In Fact three accidents did occur involving live PPL utilities and wires that fell to the ground causing damage, outages, and a threat to public safety by not maintaining this data. ( See the Amended Formal Complaint Of Nieves Abad)

" PPL has violated preservation of records by not maintaining records. They failed to maintain records by keeping incomplete, missing, inaccurate records. This included work orders, incident reports, call center data, utility pole data, utility wire data and PPL inspection maintenance vegetation management and storm damage data for the PPL owned facilities in

this complaint. These missing records put the public and the complainant in danger and is a systematic failure on the part of PPL”

**§ 57.28. Electric safety standards.**

(d) *Records.* An electric utility shall keep adequate records as required for compliance with the safety code in subsection (b). The records shall be accessible to the Commission and its staff.

**C. PPL’S PRELIMINARY OBJECTION NO. 3: The Averments Of Paragraph No. 11 Of The Amended Complaint Fail To State A Claim For Which The Relief Requested By Complainant May Be Granted Because PPL Electric Cannot Lawfully Refuse Access To “Useable Space” On Its Poles To Telecommunications And Cable Providers (52 Pa. Code § 5.101(a)(4))**

Complainant does not dispute cable television, telecommunication carriers, internet providers, and/or any other utility company having access to allowable space on PPL owned utility poles. Complainant does not dispute these utility companies rights under the federal communications act 47 U.P.S. section 224 (C)(3),(D)(2),or (F)(1). Also, the complainant does not dispute these utility complaint rights under Pa title 52 chapter 77 section 77.1-77.7. Each individual utility company currently occupying a space is not the issue in this complaint. Nor does the complaint know of or seek a violation that the PUC has jurisdiction against an individual utility company . The problem stems from the current and past conditions of PPL owned utility poles and wires. PPL’s outdated pole design is not equipped to handle the modern needs for utility wires to safely connect too. Since 2007 utility pole spaces being occupied on PPL owned utility poles have multiplied. This has caused a strain on the already degenerating PPL utility poles. This outdated utility pole design makes the utility pole and wire conditions on Green Place and Amity Court unsafe. PPL has the duty to deny pole space on a non discriminatory basis where there is insufficient capacity and causes a safety threat to the public. The Complainant, his family, and the public use these roads between the hours of 8:00 am and

8:00 pm to access the Complainants property. Complainant is a customer of PPL and has electric service on the Complainants property. PPL has knowledge of the old and deteriorating conditions of these utility poles in this complaint. No work order or corrective action has been done on PPL's part to correct utilities in this complaint. PPL still grants access to utility companies that add more and more utility wires to PPL owned utility poles. The load being placed on these degenerated poles caused stress factors and the utility poles to lean from overbearing weight. PPL has allowed access to so many additional utility wires without updating a modern pole design. This has caused utility wires to completely block access and ways of egress to the second story windows of the houses along Green Place and Amity Court. Some houses are blocked on two sides and have lost egress to two sides of the second story windows to their house. Complainant is affected by this flawed utility pole design. These poles run in and around his property and neighboring properties. These utility poles and wires are in and around the only roads for first responders to access his property. By failing to detect and correct the problems of the current utility pole and wire design. It has jeopardized the safety of the Complainant, his family, and the public on a day to day basis. If emergency responders would need to be called to a fire or an emergency that would require emergency equipment such as a fire truck to get to the Complainant. The PPL owned utility poles, wires, and current pole design would impede or delay response times to get to the Complainant. These blocks are not full roads, they are courts and places. These smaller one car roads make it difficult to navigate and with the additional flawed utility pole and wire designs this now pose a threat to public safety. A visual inspection of this pole design would determine the many safety transgressions. PPL is currently not in compliance with Pa title 52 chapter 77 section 77.4(A), federal communications act 47U.S.C section 224(f)(2), 47 CFR, chapter 7 subpart J 1.1403(A),(B) and PPL's owned utilities pole attachment standards. These sections of state and federal law leave it in the hands of the electrical company to determine the safety of adding each additional utility wire to PPL owned utility poles. PPL has failed in its duties to maintain

safe and reasonable service to the public. With the current utility pole and wire design it can not sustain the current growth of utility wires on PPL owned utility poles in this Complaint. This has led to a public safety issue and has put the Complainant at a risk of injury. All companies should have access to these utility poles. It is PPL's duty to ensure that this is done safely and properly to accommodate new utility company wires. PPL's current pole design is inadequate.

**D. PPL'S PRELIMINARY OBJECTION NO. 4: The Amended Complaint Fails To Join One Or More Necessary Parties (52 Pa. Code §5.101(a)(5))**

Complainant does not dispute cable television, telecommunication carriers, internet providers, and/or any other utility company having access to allowable space on PPL owned utility poles. Complainant does not dispute these utility companies rights under the federal communications act 47 U.P.S. section 224 (C)(3),(D)(2),or (F)(1). Also, the complainant does not dispute these utility complaint rights under Pa title 52 chapter 77 section 77.1-77.7. Each individual utility company currently occupying a space is not the issue in this complaint. Nor does the complaint know of or seek a violation that the PUC has jurisdiction against an individual utility company . The problem stems from the current and past conditions of PPL owned utility poles and wires. PPL's outdated pole design is not equipped to handle the modern needs for utility wires to safely connect too. Since 2007 utility pole spaces being occupied on PPL owned utility poles have multiplied. This has caused a strain on the already degenerating PPL utility poles. This outdated utility pole design makes the utility pole and wire conditions on Green Place and Amity Court unsafe. PPL has the duty to deny pole space on a non discriminatory basis where there is insufficient capacity and causes a safety threat to the public. The Complainant, his family, and the public use these roads between the hours of 8:00 am and 8:00 pm to access the Complainants property. Complainant is a customer of PPL and has electric service on the Complainants property. PPL has knowledge of the old and deteriorating conditions of these utility poles in this complaint. No work order or corrective action has been done on PPL's part to correct utilities in this complaint. PPL still grants access to utility

companies that add more and more utility wires to PPL owned utility poles. The load being placed on these degenerated poles caused stress factors and the utility poles to lean from overbearing weight. PPL has allowed access to so many additional utility wires without updating a modern pole design. This has caused utility wires to completely block access and ways of egress to the second story windows of the houses along Green Place and Amity Court. Some houses are blocked on two sides and have lost egress to two sides of the second story windows to their house. Complainant is affected by this flawed utility pole design. These poles run in and around his property and neighboring properties. These utility poles and wires are in and around the only roads for first responders to access his property. By failing to detect and correct the problems of the current utility pole and wire design. It has jeopardized the safety of the Complainant, his family, and the public on a day to day basis. If emergency responders would need to be called to a fire or an emergency that would require emergency equipment such as a fire truck to get to the Complainant. The PPL owned utility poles, wires, and current pole design would impede or delay response times to get to the Complainant. These blocks are not full roads, they are courts and places. These smaller one car roads make it difficult to navigate and with the additional flawed utility pole and wire designs this now pose a threat to public safety. A visual inspection of this pole design would determine the many safety transgressions. PPL is currently not in compliance with Pa title 52 chapter 77 section 77.4(A), federal communications act 47U.S.C section 224(f)(2), 47 CFR, chapter 7 subpart J 1.1403(A),(B) and PPL's owned utilities pole attachment standards. These sections of state and federal law leave it in the hands of the electrical company to determine the safety of adding each additional utility wire to PPL owned utility poles. PPL has failed in its duties to maintain safe and reasonable service to the public. With the current utility pole and wire design it can not sustain the current growth of utility wires on PPL owned utility poles in this Complaint. This has led to a public safety issue and has put the Complainant at a risk of injury. All companies should

have access to these utility poles. It is PPL's duty to ensure that this is done safely and properly to accommodate new utility company wires. PPLs current pole design is inadequate.

**E. PPL'S PRELIMINARY OBJECTION NO. 5: The Complainant Does Not Satisfy The Requirements For Standing To Pursue Various Claims In The Amended Complaint (52 Pa. Code §5.101(a)(7))**

**1. Argument 1 (Vegetation Management) and 2 (PPL Inspection and Maintenance Reports)**

In February of 2023, Complainant went into talks with the City Of Scranton regarding the property at 837 Rear Capouse Ave Scranton Pa 18509. Complainants verified the past and current deeds being clear of liens, easements, taxes, and other deficiencies with several departments within the city of scranton. In March of 2024 Complainant went into contract with the Lackawanna Land Bank for the above stated parcel. In March of 2023, Complainant paid The Lackawanna Land bank \$500.00 to purchase complaints property. On 04/12/23, the Board of Lackawanna County approved the purchase of this parcel by Nieves Abad. On 04/25/23, the deed was finalized. In March of 2023, before the purchase was finalized, Complainant contacted PPL to remove utility poles and wires that were located on the Complainants property so that tree removal could be conducted and a structure could be built on the property. PPL was requested to remove the poles and wires so they would not be damaged during tree removal, ultimately PPL refused to relocate or remove their utility poles and wires, drop or de-energize utility poles and wires, and/or relocate utility poles and wires. PPL has submitted call center records into discovery. Throughout this call center data, it is noted that the Complainant asked several times for utility poles and wires to be removed, relocated and/or dropped or de-energized so that tree removal could be done. The Complainant requested new service on the property in March of 2023, PPL sent Tom Kernoschack to the property of the Complainant on 04/06/23. On 04/13/23 the Complainant suffered property damage and his safety was put at risk by PPL's negligent vegetation management practices, utility pole and wire maintenance,

and PPL inspection practices. In this amended formal complaint there are three accidents that occurred on the Complainants property. In PPL's Answers To The Amended Formal Complaint of Nieves Abad, PPL has admitted to these accidents. Here the Complainant clearly met the three requirements for standing 1. Casualty( A cause in-fact link between an act and alleged harm)2. Immediacy ( more then a tetanus connection between cause and effect. 3. Substantially ( a concrete adverse effect beyond "the abstract interest" of having others comply with the law.

### **Argument 3 ( Preservation of Records)**

PPL has failed to maintain record, PPL employees are not properly trained and/or do not practice adequate record keeping to comply with title 52 chapter 57 section 57.45, title 52 chapter 57 section 57.198, or the most recent publications of the national associates of regulatory utility commissions ( hereon in NARUC) published October 2007 entitled "Regulations to govern the preservation of Records of electric,gas and water utilities." In the amended formal complaint of Nieves Abad the incomplete, missing, or inaccurate record keeping of PPL is listed:

1. Work orders, 2. Incident Reports, 3. Call center data, 4. Utility Pole Data, 5. Utility wire data, 6. PPL utility and wire inspection data. 7. Utility wire and pole maintenance data, 8. PPL's vegetation management data for its right of way, and 9. Storm damage data for the utilities in this complaint. PPL and PPL employees have admitted through discovery that PPL lacks this data or it does not exist.

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" PPL has violated preservation of records by not maintaining records. They failed to maintain records by keeping incomplete, missing, inaccurate records. This included work orders, incident

reports, call center data, utility pole data, utility wire data and PPL inspection maintenance vegetation management and storm damage data for the PPL owned facilities in this complaint. These missing records put the public and the complaint in danger and is a systematic failure on the part of PPL”

**§ 57.28. Electric safety standards.**

(d) *Records.* An electric utility shall keep adequate records as required for compliance with the safety code in subsection (b). The records shall be accessible to the Commission and its staff.

**Argument 5 (New Poles)**

Complainant does not dispute cable television, telecommunication carriers, internet providers, and/or any other utility company having access to allowable space on PPL owned utility poles. Complainant does not dispute these utility companies rights under the federal communications act 47 U.P.S. section 224 (C )(3),(D)(2),or (F)(1). Also, the complainant does not dispute these utility complaint rights under Pa title 52 chapter 77 section 77.1-77.7. Each individual utility company currently occupying a space is not the issue in this complaint. Nor does the complaint know of or seek a violation that the PUC has jurisdiction against an individual utility company . The problem stems from the current and past conditions of PPL owned utility poles and wires. PPL's outdated pole design is not equipped to handle the modern needs for utility wires to safely connect too. Since 2007 utility pole spaces being occupied on PPL owned utility poles have multiplied. This has caused a strain on the already degenerating PPL utility poles. This outdated utility pole design makes the utility pole and wire conditions on Green Place and Amity Court unsafe. PPL has the duty to deny pole space on a non discriminatory basis where there is insufficient capacity and causes a safety threat to the public. The Complainant, his family, and the public use these roads between the hours of 8:00 am and 8:00 pm to access the Complainants property. Complainant is a customer of PPL and has electric service on the Complainants property. PPL has knowledge of the old and deteriorating

conditions of these utility poles in this complaint. No work order or corrective action has been done on PPL's part to correct utilities in this complaint. PPL still grants access to utility companies that add more and more utility wires to PPL owned utility poles. The load being placed on these degenerated poles caused stress factors and the utility poles to lean from overbearing weight. PPL has allowed access to so many additional utility wires without updating a modern pole design. This has caused utility wires to completely block access and ways of egress to the second story windows of the houses along Green Place and Amity Court. Some houses are blocked on two sides and have lost egress to two sides of the second story windows to their house. Complainant is affected by this flawed utility pole design. These poles run in and around his property and neighboring properties. These utility poles and wires are in and around the only roads for first responders to access his property. By failing to detect and correct the problems of the current utility pole and wire design. It has jeopardized the safety of the Complainant, his family, and the public on a day to day basis. If emergency responders would need to be called to a fire or an emergency that would require emergency equipment such as a fire truck to get to the Complainant. The PPL owned utility poles, wires, and current pole design would impede or delay response times to get to the Complainant. These blocks are not full roads, they are courts and places. These smaller one car roads make it difficult to navigate and with the additional flawed utility pole and wire designs this now pose a threat to public safety. A visual inspection of this pole design would determine the many safety transgressions. PPL is currently not in compliance with Pa title 52 chapter 77 section 77.4(A), federal communications act 47U.S.C section 224(f)(2), 47 CFR, chapter 7 subpart J 1.1403(A),(B) and PPL's owned utilities pole attachment standards. These sections of state and federal law leave it in the hands of the electrical company to determine the safety of adding each additional utility wire to PPL owned utility poles. PPL has failed in its duties to maintain safe and reasonable service to the public. With the current utility pole and wire design it can not sustain the current growth of utility wires on PPL owned utility poles in this Complaint. This has

led to a public safety issue and has put the Complainant at a risk of injury. All companies should have access to these utility poles. It is PPL's duty to ensure that this is done safely and properly to accommodate new utility company wires. PPLs current pole design is inadequate.

**Wherefore, The Complainant, Nieves Abad, respectfully requests that the Commission grant denying all Preliminary Objections To The Amended Formal Complaint Of Nieves Abad, granting the Amended Formal Complaint in full or to grant to the Complainant any other relief as is just and reasonable under the circumstances.**

CC:

Alphonso Arnold III  
Administrative Law Judge  
Office of Administrative Law Judge  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
Email- [alphonarno@pa.gov](mailto:alphonarno@pa.gov)

Rosemary Chiavetta  
Secretary of The Commission  
Commonwealth Keystone Building  
400 North Street, 2nd Floor North  
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Harrisburg, PA 17105-3265

Peter J Kramer Esquire  
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Philadelphia, PA 19103



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Dated- February 28, 2025