
BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

Nieves Abad
(Pro-Se)

Complainant

VS

PPL Electric Utilities Corporation

C-2024-3047163

Respondent

DATE OF DEPOSIT

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

MAR 15 2025

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

To Whom This May Concern,

Attached for filing is Objections/Answer To Motion For Protective Order to Respondent 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
Phone - 631-575-2348
Dated- March 17, 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

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

Nieves Abad
(Pro-Se)

Complainant

vs.

PPL Electric Utilities Corporation
Respondent

AFFIDAVIT

Docket No. C-2024-3047163

AFFIDAVIT

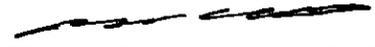
I, Nieves Abad, verify that I am the Complainant in this Complaint, and that the facts contained in the foregoing Objections/Answer To Motion For Protective Order to Respondent are true and correct to the best of my knowledge, information and belief, and that This verification is subject to the penalties of 18 Pa. C.S A 4904 relative to unsworn falsification to authorities.

CC:

Alphonso Arnold III
Administrative Law Judge
Office of Administrative Law Judge
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
Email- alphonarno@pa.gov

Rosemary Chiavetta
Secretary of The Commission
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



Nieves Abad
747 Delaware St
Forest City , PA 18421
Email- Marjua3@aol.com
Phone - 631-575-2348
Dated- March 17, 2025

DATE OF DEPOSIT
MAR 15 2025
PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

MAR 15 2025

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

Nieves Abad
(Pro-Se)

Complainant

Objections/Answer To
Motion For Protective Order

VS

PPL Electric Utilities Corporation

C-2024-3047163

Respondent

Objections/Answer To Motion For Protective Order

To The Public Utility Commission:

Nieves Abad, (hereon in Complainant), hereby files these Objections/Motion To The Protective Order pursuant to the Public Utility Commission (hereon in PUC). Rules and regulations against PPL Utility Corporation (hereon in PPL) in front of Honorable Administrative Law Judge Alphonso Arnold III (hereon in ALJ) states the following;

A. Complainant's Good Faith Discovery Vs PPL's Bad Faith Discovery

1. PPL has tried to create an illusion that Complainant has practiced bad faith discovery by internationally harassing, annoying, and/or burdening employees by asking them questions. Complainant is a pro-se applicant with limited legal knowledge and is not an attorney. Complainant, to the best of his ability, is attempting to litigate with a multi billion dollar company with unlimited resources. PPL employees and PPL attorneys have years of experience representing PPL in front of the PUC. Complainant has stayed within the scope of discovery, and has practiced good faith discovery that did not harass, annoy, and/or burden employees by asking them irrelevant questions. Instead, the Complainant is investigating and questioning documents provided by PPL and PPL employees. (See PPL appendix B Interrogatories and Depositions of PPL and PPL employees) Questions relating to this documentation

evidence were asked of PPL employees. PPL has submitted hundreds of objections to a substantial number of the Complainants' questions to employees. (See Appendix 1 PPL Discovery Documents) PPL has provided some responses to Interrogatories and Depositions questions that led to more questions. Complainant replied within the time frames required by law. A majority of the questions that were answered by PPL and PPL employees have been answered incorrectly, insufficiently, and/or not at all. This led to additional questioning of PPL employees by the Complainant. PPL has withheld important documents and information that is supposed to be disclosed during discovery. This has led to more questioning. The Complainant had to determine what documents were being withheld. PPL concealed the existence to the Complainant. PPL has caused excessive questioning. PPL has extended and wasted months of time with discovery practices of not answering questions. PPL has caused the Complainant additional and unnecessary financial expenses. PPL has mastered the art of using the administrative process as a weapon against the public. PPL's discovery tactics have successfully discriminated against the Complainant resulting in additional expenses by withholding information, violating his due process rights, extending the discovery period by over six months, amongst other ethical violations. PPL and its attorneys do not want this information to come out. This information will prove the truth in this matter. PPL should want this information to be reveal to prove PPL's standards. The question is why is PPL trying so hard to avoid the truth? The answers are in the information and questions the Complainant seeking of PPL and PPL employees. Without this information the conditions of PPL ROW before, during, and after the accidents occured may not be known.. PPL is in sole possession of this information. By giving PPL a protective order it would disadvantage and discriminate against the Complainants case. Vital information that would lead to discoverable evidence and would change the outcome of this complaint would be excluded from an upcoming evidentiary hearing. It would allow PPL to get away with their actions and inactions which put the Complainant and the public safety at risk. The State Of Pennsylvania (hereon in PA) over two decades ago, realized that Electrical Distribution companies (hereon in EDC), were not in compliance with safety and reliability standards. In the early 2000's new rules were implemented for ECD's to follow which operate in the State Of PA.(See Docket # M-2009-2094773 PPL Biennial Plan)

These rules were created to protect the citizens of PA. EDC in some cases are still not in compliance with these standards. In this Complaint PPL has not fulfilled its duties as an EDC operating in the state of PA for maintaining safe and reliable service. PPL has admitted there were three accidents that occurred on the Complainant's property involving the Complainant and live PPL owned utility poles and wires. (see PPL's Answers To The Amended Formal Complaint Of Nieves Abad) In this complaint there were dozens of contacts and discussions between PPL employees and the Complainant before these accidents occurred. Why did these three accidents happen without PPL intervening to prevent and protect the Complainant and the public's safety? PPL has spent a tremendous amount of time and resources avoiding these answers. PPL has objected to, not answered, or answered insufficiently to questions asked in interrogatories and depositions. This had led to several successful motions to compel. The ALJ ordered PPL to answer questions in each motion to compel. Subpoena for evidence have been requested for both documentation, answers from PPL, and PPL employees which are still pending. A third motion to compel discovery is pending. There have been several briefs filed by the complainant regarding similar accusations of PPL unethical discovery tactics. This Complaint is not the only case that PPL has done this to in the PUC. Anyone who challenges the authority of PPL, is met with a defense team paid for by this billion dollar corporation and is unlikely to win. This Complaint is unique, where PPL has left a lot of evidence behind. This evidence is vital to this Complaint. The actions of PPL going to this great extent to withhold this information is not the actions of an innocent party.

2. PPL has sent over hundreds of pages of discovery documents, most of these documents the Complainant has discovered do not have relevance to this case. (See Appendix 1 PPL discovery documents). PPL have years of experience in front of the PUC, and have experienced attorneys. The Complainant is Pro-Se. By PPL submitting these documentations, the Complainant had the obligation to ask questions about the documents submitted to see what relevance they have in this complaint. PPL can not submit these documents to the Complainant, and then object to the Complainant questioning the documentation submitted into discovery. These questions asked to PPL and PPL employees, are asking for explanations of the documents and the answers submitted to the Complainant through discovery. The Complainant is

trying to decipher what material presented to him by PPL is pre hearing material, what information is irrelevant, and what information is admissible evidence. The flooding of irrelevant documents is another one of PPL's unethical discovery tactics.

3. Instead of writing Motion to Compel, after Motion to Compel, The Complainant has tried to remedy these issues by communication with PPL attorneys Post & Schell. Complainant has sent dozens of emails, and made dozens of phone calls to resolve this issue. Complainant re-wrote his questions to try to satisfy PPL so that they would answer Interrogatories and Deposition questions. This did not work. PPL continues to object to every question that has direct subject matter to this complaint. PPL continues to only provide documents and statements that are mostly irrelevant to this complaint, or in PPL's favor. PPL has tainted this entire complaint, with its unethical discovery tactics and by making false claims throughout this legal proceeding.

PPL has over the course of this complaint incorporated utility pole # 57317N46297 into this matter. This utility pole does not exist on the Complainants property and was not a part of this Complaint. PPL has not answered The Original Formal Complaint of Nieves Abad for pole # 57316N46296. PPL instead answered questions throughout the Answer to the Original Complaint Of Nieves Abad, the original preliminary objections, interrogatory questions, and deposition questions with pole # 57317N46297. PPL has also claimed to have a Right Of Way (hereon in ROW) agreement with a former landowner in the original answers to the Complaint Of Nieves Abad, and the original preliminary objections. PPL has disclosed this agreement during the discovery process (See appendix 1 PPL Discovery Documents, ROW agreement) it states the ROW is for utility pole # 57317N46297. Pole # 57317N46297 was never a part of this Complaint. This pole does not exist on the Complainants property. PPL claims that pole # 57320N46302 is in a public ROW. This pole is not in a public ROW. In order to ask this court to remove these utility pole off of the Complainants property. The Complainant must prove these poles are on his property. PPL has provided several maps through discovery that places pole #57320N46302 on the Complainants property. These issues have not been resolved. This has caused dozens of questions to PPL and PPL employees. Dozens of emails and phone calls to Post & Schell.

Several briefs that were filed with the PUC. This has resulted in extended questioning and has extended the discovery period by months. PPL has made several false claims in PPL's original answer to the complaint of Nieves Abad and PPL's original preliminary objections. PPL has now made several false claims in its response to the Amended Formal Complaint Of Nieves Abad and in PPL's preliminary objections to the Amended Formal Complaint of Nieves Abad. These false claims amongst others involving utility pole location and an alleged ROW document.

4. On 5/17/24, ALJ, granted in part and denied in part PPL objections to the original complaint of Nieves Abad. On that day it was determined, relocation of utility facilities at a customer's request falls within the jurisdiction of the PUC. Also on that day it was clarified to the Complainant, that easements or monetary damages are not under the jurisdiction of the PUC and was dismissed. (See appendix 2 Order Granting/Denying PPL's Preliminary Objections To The Complaint Of Nieves Abad)

Judge Arnold: " In addition, the Commission has held that the relocation of utility facilities at a customer's request falls within the statutory definition of service and that the Public Utility Code defines service in its broadest and most inclusive sense. See Barbara Gallagher V. PECO Energy Company, Docket No. C-2010-2201568 (Order entered September 22,2011) at 21. Taking the averments and any reasonable inferences from the Complaint to be true, it could reasonably be constructed that Complainant may have asserted an unreasonable service allegation in relation to Respondent's refusal to move its utility poles from Complainant's property. Therefore, for the above reasons, Respondent's Preliminary Objections made pursuant to 52 Pa.Code 5.101(a)(1) will be denied. "

On 07/18/24 during a pre-trial hearing, ALJ further clarified his earlier ruling. The PUC has no jurisdiction to hear a case that involves an easement issue or award monetary damages. Complainant has not asked questions seeking monetary damages. Complainant has not asked question seeking an easement. ALJ added if poles are found to be in violation of a law under the jurisdiction of the PUC the poles would be removed at no cost to the Complainant. Pa Title 66 Chapter 15 section 1501 requires an EDC operating in The State Of PA to provide safe and reasonable service. This is the underlying issue of this Complaint. The Complainant during discovery has learned about several other PPL violations and issues that PUC

has jurisdiction over. The Complainant has since amended the formal complaint and this matter is still pending. (See appendix 2 Order Granting/Denying PPL's Preliminary Objections To The Complaint Of Nieves Abad)

Judge Arnold: " So for matters that might be involving any the scope or validity of right of ways or easements, of matters that might involve trump paths over Mr. Abad's property, the commission does not have any jurisdiction to determine those issues. And I also noted that the Commission does not have jurisdiction to resolve disputes over monetary damages. So and it explains Mr. Abad was seeking monetary damages for these poles that he mentioned are that he alleges are on his property. The Commission does not have jurisdiction to award monetary damages concerning that. And in addition, these issues concerning the damages that Mr. Abad allegedly caused to these poles. Is that the Commission does not really have any jurisdiction to resolve that issue as well."

"Okay. So all right. So mainly my understanding at this time is that if there is an underlying—for example, if there's an underlying issue in this proceeding that implicates the Public Utility Code, then I can review that issue.

So for example, Section 1501 of the Pennsylvania Public Utility Code states in sum— and this is a brief restatement of 1501—but it basically says that the utility companies—public utilities have to provide safe and reasonable service to their customers. "

" So if I were to determine that placement of these poles would in some be in violation of that section, then it would be my understanding that I could and the Commission could order those poles to be moved to some other location on the property. "

" So if I were to determine— if I were to determine that placement of these poles would be in some way violative of the law that The Commission has jurisdiction over, then the order would likely order that PPL move these poles with no cost to you."

5. The complainant is well within the scope of discovery governing an evidentiary hearing in front of the PUC. All the evidence requested falls in the category of hearing preparation material and is the complainants due process right to obtain from ppl. This evidence is not vague, overly broad, unduly

burdensome, duplicative, or an improper bad faith use of discovery other than its forcing PPL to disclose the truth. PPL by law is required to compile and store this data. This data is readily available to PPL. PPL should want the truth to be revealed to show it is in compliance with PA state mandates and its utilities are safe for the public. PPL is under the continuing duty to supplement answers to questions during discovery

Pa Title 52 Chapter 5 Section 5.321(C) scope

(c) *Scope.* Subject to this subchapter, a party may obtain discovery regarding any matter, not privileged, which is relevant to the subject matter involved in the pending action, whether it relates to the claim or defense of the party seeking discovery or to the claim or defense of another party, including the existence, description, nature, content, custody, condition and location of any books, documents, or other tangible things and the identity and location of persons having knowledge of a discoverable matter. It is not grounds for objection that the information sought will be inadmissible at hearing if the information sought appears reasonably calculated to lead to the discovery of admissible evidence.

PA Title 52 Chapter 5 § 5.323. Hearing preparation material.

(a) *Generally.* Subject to this subchapter and consistent with Pa. R.C.P. 4003.3 (relating to scope of discovery trial preparation material generally), a party may obtain discovery of any matter discoverable under § 5.321(b) (relating to scope) even though prepared in anticipation of litigation or hearing by or for another party or by or for that other party's representative, including his attorney, consultant, surety, indemnitor, insurer or agent. The discovery may not include disclosure of the mental impressions of a party's attorney or his conclusions, opinions, memoranda, notes, summaries, legal research or legal theories. With respect to the representative of a party other than the party's attorney, discovery may not include disclosure of his mental impressions, conclusions or opinions respecting the value or merit of a claim or defense or respecting strategy, tactics or preliminary or draft versions of written testimony or exhibits, whether or not final versions of the testimony or exhibits are offered into evidence.

§ 5.324. Discovery of expert testimony.

(a) Consistent with Pa.R.C.P. 4003.5 (relating to discovery of expert testimony trial preparation material), discovery of facts known and opinions held by an expert, otherwise discoverable under § 5.321 (relating to scope), including that acquired or developed in anticipation of litigation or for hearing, may be obtained as follows:

(1) A party may through interrogatories require both of the following:

(i) That the other party identifies each person whom the party expects to call as an expert witness at hearing and to state the subject matter on which the expert is expected to testify.

(ii) That the other party have each expert so identified state the substance of the facts and opinions to which the expert is expected to testify and a summary of the grounds for each opinion. The party answering the interrogatories may file as the answer a report of the expert, have the interrogatories answered by the expert or provide written direct testimony of the expert. The answer, separate report or

testimony shall be signed by the expert and shall be deemed to be provided under oath in accordance with section 333(d) of the act (relating to pre hearing procedures).

Pa Title 52 Chapter 15 Section 5.342(1)

A party or an expert witness who has responded to a request for discovery with a response that was complete when made is under a duty to supplement a response to include information thereafter acquired, as follows:

(1) A party is under a continuing duty to supplement responses with respect to a question directly addressed to the identity and location of persons having knowledge of discoverable matters and the identity of each person expected to be called as an expert witness at hearing, the subject matter on which the expert is expected to testify and the substance of the testimony as provided in § 5.324(a)(1) (relating to discovery of expert testimony)

§ 5.345. Procedure on depositions by written questions.

(a) A party taking a deposition by written questions shall serve the questions upon the deponent and serve a copy upon each other party or his attorney of record. Within 30 days thereafter the party served and other parties may serve cross questions upon the deposing party and upon each other party or the attorney of record. Reply questions shall be similarly served by a party within 10 days of the service of cross questions.

(b) The questions must contain a notice stating the name and address of each person to be examined if known, and, if the name is not known, a general description sufficient to identify him or the particular class or group to which he belongs. A deposition upon written questions may be taken of a public or private corporation, a partnership or association, or a governmental agency in accordance with § 5.343(e) (relating to procedures in deposition by oral examination).

(c) Objections to the form of questions are waived unless filed and served upon the party propounding them within the time allowed for serving the succeeding cross or other questions or within 10 days after service of the last questions. Other objections may be made at the hearing except as otherwise provided by § § 5.346—5.348 (relating to persons before whom depositions may be taken; taking of depositions-objections; and transcript of deposition, objections and filing).

(d) A copy of questions for the taking of a deposition, as well as a signature page and envelope bearing the caption and marked “Deposition of

” (name of witness), shall be transmitted to the person being deposed who shall complete, certify and return the completed deposition to the sender.

(e) After the service of questions and prior to the taking of the testimony of the deponent, the presiding officer, on motion promptly made by a party or a deponent, may make an order in accordance with § 5.362 (relating to protective orders) or an order that the deposition may not be taken except upon oral examination

§ 5.341. Written interrogatories to a party.

(a) Subject to the limitations provided by § 5.361 (relating to limitation of scope of discovery and deposition), a party may serve upon another party written interrogatories to be answered by the party served or, if the party served is a public or private corporation, similar entity or a partnership or association, by an officer or agent, who shall furnish the information as is available to the party.

(b) The party propounding interrogatories shall serve a copy on the parties and shall file a certificate of service with the Secretary. Interrogatories may not be filed with the Commission.

(c) Interrogatories may relate to matters which can be inquired into under § § 5.321, 5.323 and 5.324 (relating to scope; hearing preparation material; and discovery of expert testimony) and may include requests that the answering party provide copies of documents without making a separate request for the production of documents under § 5.349 (relating to requests for documents, entry for inspection and other purposes).

(d) Each interrogatory should be limited to a single question or request for information.

(e) A party should use a logical and sequential numbering system for interrogatories.

§ 5.349. Requests for documents, entry for inspection and other purposes.

(a) A party may serve on another party a request for either of the following:

(1) To produce and permit the party making the request, or someone acting on the party’s behalf, to inspect and copy designated documents—including writings, drawings, graphs, charts, photographs, computer records and other compilations of data from which information can be obtained, translated, if necessary, by the respondent through detection devices into reasonable usable form—or to inspect a copy, test or sample tangible things which constitute or contain matters within the scope of § § 5.321(b), 5.323 and 5.324 (relating to scope; hearing preparation material; and discovery of expert testimony) and which are in the possession, custody or control of the party upon whom the request is served.

(2) To permit entry upon designated land or other property in the possession or control of the party upon whom the request is served for the purpose of inspecting and measuring, surveying, photographing, testing or sampling the property or a designated object or operation thereon, within the scope of § § 5.321(b), 5.323 and 5.324.

(b) As an alternative to permission to inspect and copy, and if requested by the party seeking discovery, the party against whom discovery is sought shall reproduce the designated documents at the requesting party's expense. Regulated utilities shall provide copies of requested materials to Commission staff, which includes the Office of Trial Staff, the Office of Consumer Advocate and the Office of Small Business Advocate at no charge.

(c) The request must set forth the items to be inspected either by individual item or by category, describe items and categories with reasonable particularity, and specify a reasonable time, place and manner of making the inspection and performing the related acts.

(d) The party upon whom the request is served shall serve a written response within 10 days for rate proceedings, and 20 days after service of the request for all other cases. Time periods may be modified by the presiding officer or by agreement of the parties. The response shall be verified or notarized, as permitted by § 1.36 (relating to verification), and state that inspection and related activities will be permitted as requested. If the request is objected to, the objection shall be made in the manner described in § 5.342 (relating to answers or objections to written interrogatories by a party). A party may request another party to produce or inspect documents as part of interrogatories filed under § 5.341 (relating to written interrogatories to a party). The party submitting the request may move for an order under § 5.342(e) with respect to an objection or to other failure to respond to the request or any part thereof, or failure to permit inspection as requested.

6. PPL and PPL employees have "opened the door" for the questions in depositions. Complainant is questioning the answers given during depositions and documentation given during interrogatories. PPL and PPL employees have answered prior depositions and interrogatories to similar questions and have provided documentation. PPL has not objected to previous questions asked on the same or similar subject matter. PPL employee Daniel Walker made this statement in response to a question : (See appendix 22 & 24 Depositions set 1 & 11.

"Q. What dates and times did you speak to Nieves Abad about the property at 837 Rear Capouse Ave, Scranton pa 18509."

"A. I cannot recollect any specific dates but the first was likely in April of 2023 shortly after originally receiving the work assignment, I believe Mr.Abad would have been the first person to whom I would have spoken, as a matter of course. I recall having two or three conversations subsequently wherein we discussed the poles locations and PPL's lack of ROW for said situate on his property; in these conversations I endeavored to explain to him that PPL had owned and maintained the poles at issues for a

period well in excess of 21 years and PPL, therefore, asserted "proscribed" rights for them. I believe I also pointed out that the poles were present and clearly visible when he acquired the property in April of 2023."

Daniel Walker clearly states PPL has owned and maintained these utility poles for at least 21 years. This prompted the complainant to ask the following question

"Q. As per your answer to questions number 9, Deposition Set I, you described PPL owned and maintained pole #57327N46297. Please provide maintenance records for this pole for 21 consecutive years before Nieves Abad asked you to move these poles.

Please list records including replacement, repair, movement, inspections or any other information or any other records on this pole. "

"A. Respondent has no such records nor any access thereto."

Daniel Walker clearly states that PPL has maintained these utility poles. His answer to these questions has given the Complainant a reason to respond with questions regarding pole maintenance.

B. The following documentation and information is being requested of PPL :

7. Questions were asked by Interrogatories and depositions to PPL & PPL employees being involved billing invoices # 91130032-3 and 91130033-3. Originally the ALJ ruled billing # 91130032-3 and 91130032-3 were not relevant to this matter because the PUC did not have jurisdiction over billing matters. Later, after documents presented through discovery by PPL. Also after PPL attorneys Peter Kramer and Nicholas Strobbe clarified PPL's position on these invoices. It became clear PPL was using these invoices to stop Utility pole location. (See PPL original answer to the complaint of Nieves Abad and preliminary objections to the complaint of Nieves Abad.) These two invoices have to be paid in order to relocate utility poles on the Complainants property. The PUC has jurisdiction over a tariff to relocate utility poles. The PUC clearly defines what tariff can be charged by an EDC to a customer as a fee for pole relocation at the customer's request. PPL is charging the Complainant an illegal tariff. The Complainant has a due process right to question PPL on the material cost, labor cost, or any cost that is

being charged to him in order to relocate utility poles. All information in billing invoice 91130033-3 and 91130032-3 including the invoices themselves, employees, subcontractor, or attorneys involved in creating these invoices, and any other relevant cost to these invoices being charged to the Complainant is admissible evidence. PPL's fees for tree damage in both billing invoices are being charged as a tariff and is the jurisdiction of the PUC. By incorrectly charging the Complainant these tariffs for billing invoices # 91130032-3 & 91130033-3 in order to relocate utility poles. PPL has further caused Complainant inquiry through questions. Dozens of questions were necessary to inquire about the exact cost being charged for pole removal and the exact cost being applied for damage done during tree removal. PPL has submitted into discovery dozens of documents relating billing of two incidents that occurred on 04/13/23 and 5/25/23. (See appendix 1 discovery documents). This further proves PPL intends to use this information at an upcoming evidentiary hearing as it was pre disclosed as hearing preparation material. These documents resulted in more questioning as to what the relevance of these documents have to this Complaint. This gives the Complainant an unfair disadvantage and discriminates against his due process rights to discovery. The Complainant is a pro-se applicant, and has limited funds to survive the defense of a company with unlimited resources. PPL has proved case after case in front of the PUC. That PPL will use all means to win their case even if they are wrong. This upcoming evidentiary hearing in front of the PUC must be even. The value of this information that is being withheld from PPL outweighs the costs to this complaint. It is crucial to this complaint that the PUC order PPL to release this information. PPL has sole access to all the information needed to prove this Complaint. PPL will not release this information without the help from the PUC.

8. PPL claims to have disclosed all information in prior discoveries, depositions, and/or interrogatories. This is false, PPL has not disclosed all information. PPL has submitted parts of information, documents and data on this matter. Information provided by PPL has been mostly in favor of PPL or irrelevant Information not needed. Documents that are necessary to prove the

Complainant's cases have not been provided. PPL has sole access to these records.

W/O # 327197674 made on or about 03/29/23. W/O # 58719381 made on or about 04/03/23, W/O # 58720380 made on or about 04/26/23, and W/O # 58730565 made on or about 07/18/23 have not been disclosed by PPL. PPL has submitted answers to Interrogatories and Requests for production of documents set 1. PPL has repeated its claims that all work orders have been disclosed. The above work orders have not been submitted during discovery and are still outstanding. Complainant has reached out to PPL Attorneys at Post & Schell through email and phone. These work orders have still not been provided. On 02/06/24, Complainant spoke to PPL employee Lindsay Smigel, this call was documented by PPL's call center. Both employee and complainant went over work orders, PPL employee documented the work orders during this conversation. On 01/08/2024, an informal hearing was started, this call was made after this hearing began. Preservation of documents under PA State Law requires these work orders to be preserved because of ongoing litigation. PPL has failed to provide these work orders. The actions of PPL and Post & Schell has contributed to questions and extended discovery times. This gives the Complainant an unfair disadvantage and discriminates against his due process rights to discovery. The Complainant is a pro-se applicant, and has limited funds to survive the defense of a company with unlimited resources. PPL has proved case after case in front of the PUC. That PPL will use all means to win their case even if they are wrong. This upcoming evidentiary hearing in front of the PUC must be even. The value of this information that is being withheld from PPL outweighs the costs to this complaint. It is crucial to this complaint that the PUC order PPL to release this information. PPL has sole access to all the information needed to prove this Complaint. PPL will not release this information without the help from the PUC.

9. PPL is equipped with work and asset management software (hereon in WAM) or similar software. This software is designed to keep track of data compiled from record keeping of PPL's inspection and maintenance records. This includes records from its distribution system. Including the distribution system on the property of the Complainant. PPL has declined to submit any data from its employees or subcontractors involving matters in this Complaint that are stored in this system. PPL has not disclosed

the existence of any software that was used to store data related to this matter to the Complainant. PPL has not submitted any data from its field personnel. This includes communications with the Complainant and other PPL employees about matters in this complaint. PPL has not submitted field documentations from several visits to the Complainants properties from PPL employees. This gives the Complainant an unfair disadvantage and discriminates against his due process rights to discovery. The Complainant is a pro-se applicant, and has limited funds to survive the defense of a company with unlimited resources. PPL has proved case after case in front of the PUC. That PPL will use all means to win their case even if they are wrong. This upcoming evidentiary hearing in front of the PUC must be even. The value of this information that is being withheld from PPL outweighs the costs to this complaint. It is crucial to this complaint that the PUC order PPL to release this information. PPL has sole access to all the information needed to prove this Complaint. PPL will not release this information without the help from the PUC.

10. PPL has all vehicles outfitted with laptop computers and software for Mobile Work Management. This software is Called Mobile Operations Management. (hereon in MOM or a similar software) PPL has declined to submit any data from its employees or subcontractors involving matters in this Complaint that are stored in this system. PPL has not disclosed the existence of any software that was used to store data related to this matter to the Complainant. PPL has not submitted any data from its field personnel. This includes communications with the Complainant and other PPL employees about matters in this complaint. PPL has not submitted field documentations from several visits to the Complainants properties from PPL employees. PPL withheld this evidence resulting in extended questioning of PPL & PPL employees. This gives the Complainant an unfair disadvantage and discriminates against his due process rights to discovery. The Complainant is a pro-se applicant, and has limited funds to survive the defense of a company with unlimited resources. PPL has proved case after case in front of the PUC. That PPL will use all means to win their case even if they are wrong. This upcoming evidentiary hearing in front of the PUC must be even. The value of this information that is being withheld from PPL outweighs the costs to this complaint. It is crucial to this complaint that the PUC order PPL to release this information. PPL has sole

access to all the information needed to prove this Complaint. PPL will not release this information without the help from the PUC.

ARGUMENT #1

11. PPL is equipped with wam, mom, or similar software that PPL employees and sub contractors use to take notes, information, documents and direct subject matters in this complaint. This stored data includes information about the utility pole and wires, PPL ROW on the Complainants property, and the accidents that took place on the complainants property. The information that will be found is on vegetation management, pole inspection, pole maintenance, pole reinforcement, pole replacement, recordkeeping, and other information stored about the ppl owned utility poles and wires on complainants property. This is direct subject matter to this complaint being PPL is in violation of PA Title 66 Chapter 15 Section 1501. This data would prove the negligence of PPL for PPL owned utilities in an alleged PPL right of way on the Complainants property. Without this data this Complaint may not survive the defense of a billion dollar corporation with unlimited resources and a law firm with multiple attorneys, paralegals, and PPL employees from several departments. This gives the Complainant an unfair disadvantage and discriminates against his due process rights to discovery. The Complainant is a pro-se applicant, and has limited funds to survive the defense of a company with unlimited resources. PPL has proved case after case in front of the PUC. That PPL will use all means to win their case even if they are wrong. This upcoming evidentiary hearing in front of the PUC must be even. The value of this information that is being withheld from PPL outweighs the costs to this complaint. It is crucial to this complaint that the PUC order PPL to release this information. PPL has sole access to all the information needed to prove this Complaint. PPL will not release this information without the help from the PUC.

12. PPL has not disclosed information on NorthEast Forestry, Envirovermental Contractors Inc. (hereon in ECI) PPL Forestry Department, or PPL Vegetation Management Dept that oversees the property of the Complainant. On 04/26/23, Complainant met with a sub contractor from ECI on the Complainants property. Complainant has asked for this information through email and phone calls with PPL Attorneys Post & Schell. PPL has submitted Answers to Interrogatories and Request For Production

Of Documents Set I answered on 06/17/2024. (see appendix 25 and 26 Interrogatories and Request For Production Of Documents) All subcontractor's, PPL employees, and all documents relating to this matter have not been disclosed. The actions of PPL and Post & Schell have caused extended questioning and has extended discovery time. This gives the Complainant an unfair disadvantage and discriminates against his due process rights to discovery. The Complainant is a pro-se applicant, and has limited funds to survive the defense of a company with unlimited resources. PPL has proved case after case in front of the PUC. That PPL will use all means to win their case even if they are wrong. This upcoming evidentiary hearing in front of the PUC must be even. The value of this information that is being withheld from PPL outweighs the costs to this complaint. It is crucial to this complaint that the PUC order PPL to release this information. PPL has sole access to all the information needed to prove this Complaint. PPL will not release this information without the help from the PUC.

13. PPL has withheld evidence from subcontractor OSMOSE. This company was involved with doing utility pole inspection, repair and maintenance for the utility poles in this complaint. OSMOSE has done at least two inspections on each of the utility poles on the complainants property. This information is important to the Complaint, because it directly involves matters of public safety. This information involves the safety conditions of utility poles, wires, and PPL's right of way during the time numerous safety infractions occurred on the property of Nieves Abad. Complainant has asked for this information through email and phone calls with PPL Attorneys Post & Schell. PPL has submitted Answers to Interrogatories and Request For Production Of Documents Set I answered on 06/17/2024. All subcontractor's, PPL employees, and all documents relating to this matter have not been disclosed. The actions of PPL and Post & Schell have caused extended questioning and has extended discovery time. This gives the Complainant an unfair disadvantage and discriminates against his due process rights to discovery. The Complainant is a pro-se applicant, and has limited funds to survive the defense of a company with unlimited resources. PPL has proved case after case in front of the PUC. That PPL will use all means to win their case even if they are wrong. This upcoming evidentiary hearing in front of the PUC must be even. The value of this information that is being withheld from PPL outweighs the costs to this

complaint. It is crucial to this complaint that the PUC order PPL to release this information. PPL has sole access to all the information needed to prove this Complaint. PPL will not release this information without the help from the PUC.

ARGUMENT #2

14. PPL has used contractors for its utility poles and wires and its alleged ROW on Complainants property. These contractors are required by law to maintain records about the PPL utilities they work on. These records have to be readily available at PPL's request to the contractors PPL employs. PPL explains in their biennial report how these records are recorded and maintained by their subcontractors. PA State Law allows PPL to maintain these records through these subcontractors as long as it is in accordance with the latest version of regulations to govern the preservation of records of electric, gas, and water utilities and readily available to PPL. PPL should disclose all subcontractors who have involvement with matters in this complaint. These documents are public information. This information is data that is necessary to prove utility pole safety on the Complainants property. PPL has sole access to data needed. There is no other access to this data. The Complainant does not have permission to do testing on these poles and therefore is relying on PPL's information. The evidence these contractors hold are ;

OSMOSE

1. This company has done at least two or three utility pole inspections on all of the poles in this Complaint.
2. They have reinforced or repaired all 5 poles in this Complaint with C-TRUSS and/or plates.
3. They have maintained all 5 poles in this Complaint
4. They have done testing on all 5 poles in this Complaint.
5. They have done vegetation management in or around the alleged ROW in this Complaint.
6. They have made recommendations about all 5 poles in this Complaint.
7. They are in possession of pictures, documents, data, and other information about this Complaint.

OSMOSE records will show PPL's compliance or non compliance as a group 1 class A EDC operating in the State Of PA, for its vegetation management and recordkeeping standards. Complainant

has been a victim of three accidents that involved PPL owned live utility wires falling on the Complainants property. This happened because of PPL's vegetation management practices. This vegetation did not just appear overnight, this vegetation was in place for over a decades time period.

Environmental Contractors Inc (ECI)

This contractor met the Complainants on his property on 04/26/23. This person was driving a white toyota tacoma company truck #605-0510 on the pickup truck. This gentleman took pictures and notes of PPL ROW and the vegetation in and around the ROW. He made decisions for PPL to not cut any trees in or around PPL right of way because PPL would not pay for it. He told the Complaints to call PPL to drop and de-energise the wires when Complainant was ready to cut down the trees. All the information from this contact between this contractor and the Complainant is vital information for this Complaint. This will prove that the Complainant tried to have the ROW cleared by PPL. This will prove the conditions of the ROW on that day.

PPL's forestry department, Northeast Forestry, and/or other subcontractors that have discovery material for this matter should disclose it. This data is hearing preparation material and will lead to discoverable evidence. This evidence will show the negligence of PPL's maintenance, inspection and vegetation management practices of its utility poles and wires in an alleged ROW on the Complainants property caused three accidents to occur. Without this data this Complaint will not prevail to the defense of a billion dollar corporation with unlimited resources. PPL has hired Post & Schell, a law firm with multiple attorneys and paralegals to defend them. PPL has in-house attorneys and paralegals and several employees from multiple departments to defend them. PPL has unlimited resources to call as many witnesses as needed to win this case. This gives the Complainant an unfair disadvantage and discriminates against his due process rights to discovery. The Complainant is a pro-se applicant, and has limited funds to survive the defense with a company with unlimited resources. PPL has proven case after case in front of the PUC. That PPL will use all means to win their case even if they are wrong. This upcoming evidentiary hearing in front of the PUC must be even. The value of this information that is being withheld from PPL outweighs the costs to this complaint. It is crucial to this complaint that the PUC order PPL to

release this information. PPL has sole access to all the information needed to prove this Complaint. PPL will not release this information without the help from the PUC. This gives the Complainant an unfair disadvantage and discriminates against his due process rights to discovery. The Complainant is a pro-se applicant, and has limited funds to survive the defense of a company with unlimited resources. PPL has proved case after case in front of the PUC. That PPL will use all means to win their case even if they are wrong. This upcoming evidentiary hearing in front of the PUC must be even. The value of this information that is being withheld from PPL outweighs the costs to this complaint. It is crucial to this complaint that the PUC order PPL to release this information.

§ 57.198. Inspection and maintenance standards.

(a) *Filing date and plan components.* Every 2 years, by October 1, an EDC shall prepare and file with the Commission a biennial plan for the periodic inspection, maintenance, repair and replacement of its facilities that is designed to meet its performance benchmarks and standards under this subchapter. EDCs in Compliance Group 1, as determined by the Commission, shall file their initial plans on October 1, 2009. EDCs in Compliance Group 2, as determined by the Commission, shall file their initial plans on October 1, 2010. Each EDC's biennial plan must cover the 2 calendar years beginning 15 months after filing, be implemented 15 months after filing, and must remain in effect for 2 calendar years thereafter. In preparing this plan, the following facilities are critical to maintaining system reliability:

- (1) Poles.
- (2) Overhead conductors and cables.
- (3) Transformers.
- (4) Switching devices.
- (5) Protective devices.
- (6) Regulators.
- (7) Capacitors.
- (8) Substations.

(b) *Plan consistency.* The plan must be consistent with the National Electrical Safety Code, Codes and Practices of the Institute of Electrical and Electronic Engineers, Federal Energy Regulatory Commission Regulations and the provisions of the American National Standards Institute, Inc.

(c) *Time frames.* The plan must comply with the inspection and maintenance standards in subsection (n). A justification for the inspection and maintenance time frames selected shall be provided, even if the time

frame falls within the intervals prescribed in subsection (n). However, an EDC may propose a plan that, for a given standard, uses intervals outside the Commission standard, provided that the deviation can be justified by the EDC's unique circumstances or a cost/benefit analysis to support an alternative approach that will still support the level of reliability required by law.

(d) *Routine inspection and maintenance.* The plan must specify for the standards in subsection (n) the routine inspection and maintenance requirements, and emergency maintenance plans and procedures.

(e) *Reduction of risk of outages.* The plan shall be designed to reduce the risk of outages by accounting for age, condition, technology, design and performance of system components and by inspecting, maintaining, repairing, replacing and upgrading the system.

(f) *Clearance of vegetation.* The plan must include a program for the maintenance of clearances of vegetation from the EDC's overhead distribution facilities.

(g) *Consistency with reliability reports.* The plan must form the basis of, and be consistent with, the EDC's inspection and maintenance goals and objectives included in subsequent annual and quarterly reliability reports filed with the Commission under § § 57.193(c) and 57.195 (relating to transmission system reliability; and reporting requirements).

(h) *Review procedure.* Within 90 days of receipt of the plan, the Commission or the Director of the Bureau of Conservation, Economics and Energy Planning (CEEP) will accept or reject the plan in writing.

(i) *Deemed acceptance.* Absent action by the Commission or the Director of CEEP to reject the plan within 90 days of the plan's submission to the Commission, the plan will be deemed accepted.

(j) *Plan deficiencies.* If the plan is rejected, in whole or in part, by the Commission or the Director of CEEP, the EDC will be notified of the plan's deficiencies and directed to submit one of the following:

(i) A revised plan, or pertinent parts of the plan, addressing the identified deficiencies.

(ii) An explanation why the EDC believes its plan is not deficient. The revised plan is deemed accepted absent any action by the Commission within 90 days of the filing.

(k) *Appeal procedure.* An EDC may appeal the Commission staff's determination under subsection (h) by filing an appeal under § 5.44 (relating to petitions for appeal from actions of the staff) within 20 days after service of notice of the action. A final Commission determination is appealable to the Commonwealth Court. Absent having a granted stay, the EDC is obligated to comply with the Commission's directives regarding its inspection, maintenance, repair and replacement plans.

(l) *EDC updates.* An EDC may request approval from the Commission for revising its approved plan. An EDC shall submit to the Commission, as an addendum to its quarterly reliability report under § § 57.193(c) and 57.195, prospective and past revisions to its plan and a discussion of the reasons for the revisions. Within 60 days, the Commission or the Director of CEEP will accept or reject the revisions to the plan. The appeal procedure in subsection (k) applies to the appeal of a rejection of revisions to the plan.

(m) *Recordkeeping.* An EDC shall maintain records of its inspection and maintenance activities sufficient to demonstrate compliance with its distribution facilities inspection, maintenance, repair and replacement programs as required by subsection (n). The records shall be made available to the Commission upon request within 30 days. Examples of sufficient records include:

- (1) Date-stamped records signed by EDC staff who performed the tasks related to inspection.
- (2) Maintenance, repair and replacement receipts from independent contractors showing when and what type of inspection, maintenance, repair or replacement work was done.

(n) *Inspection and maintenance intervals.* An EDC shall maintain the following inspection and maintenance plan intervals:

(1) *Vegetation management.* The Statewide minimum inspection and treatment cycle for vegetation management is between 4-8 years for distribution facilities. An EDC shall submit a condition-based plan for vegetation management for its distribution system facilities explaining its treatment cycle.

(2) *Pole inspections.* Distribution poles shall be inspected at least as often as every 10—12 years except for the new southern yellow pine creosoted utility poles which shall be initially inspected within 25 years, then within 12 years annually after the initial inspection. Pole inspections must include:

- (i) Drill tests at and below ground level.
- (ii) A shell test.
- (iii) Visual inspection for holes or evidence of insect infestation.
- (iv) Visual inspection for evidence of unauthorized backfilling or excavation near the pole.
- (v) Visual inspection for signs of lightening strikes.
- (vi) A load calculation.

(3) *Pole inspection failure.* If a pole fails the groundline inspection and shows dangerous conditions that are an immediate risk to public or employee safety or conditions affecting the integrity of the circuit, the pole shall be replaced within 30 days of the date of inspection.

(4) *Distribution overhead line inspections.* Distribution lines shall be inspected by ground patrol a minimum of once every 1-2 years. A visual inspection must include checking for:

- (i) Broken insulators.
- (ii) Conditions that may adversely affect operation of the overhead transformer.
- (iii) Other conditions that may adversely affect operation of the overhead distribution line.

(5) *Inspection failure.* If critical maintenance problems are found that affect the integrity of the circuits, they shall be repaired or replaced no later than 30 days from discovery.

15. There are three incidents in this Complaint where live PPL utility poles and wires in an alleged PPL ROW has caused the Complainants safety to be in jeopardy. The PPL owned utility poles and wires in this construction zone have continued to put the Complainants safety at risk. They have caused property damage and have delayed the development of 837 Rear Capouse Ave, Scranton Pa 18509. These incidents have caused outages, some extending over two weeks. These incidents occurred on 4/13/23, 05/25/23, and 06/06/23. Several PPL employees and subcontractors responded to the scene to help repair PPL owned utilities when these incidents occurred. Many employees have knowledge of vegetation issues, in and around PPL alleged ROW before and after these incidents occurred. John Rosato responded to the incident on at least one of these dates on 04/13/23. John wrote the property damage report and seems to be the main employee involved with completing repairs during this incident. He worked with several other PPL employees and/or subcontractors the day of this incident. John Rosato retired on 01/01/25 before he answered any questions. Michael Schaeffer is the only other known employee who responded to the 04/13/23 incident. He is being question only because John Rosato was said to have retired. PPL has objected to answering every single one of this employees' questions. Tim Roberts responded to the incident on 05/25/23. Tim wrote the property damage report and seemed to be the main employee involved with completing repairs. Tim worked with several other PPL employees and subcontractors to restore power and repair PPL owned utilities. PPL has objected to every single question asked to this employee, except for five questions. (See appendix 30 Answers to Tim Roberts deposition questions). No questions relating to the incident that occurred on this day were answered by Tim. The only five questions that were answered by this employee was personal information. These 3 employees' names were obtained by the complainant. These employees and all other employees and/or subcontractors names, documentation, and any other evidence these witnesses possess have been withheld from the Complainant by PPL. This Complaint is accusing PPL of being in violation of Pa Title 66 Chapter 15 Section 1501. These three incidents occurred when the Complainant was a victim of live utility wires falling on his property that put his safety at risk. PPL has sole control of this information. This information is vital to prove this Complaint. This case is complex and involves dozens of PPL employees

and/or subcontractors. PPL has withheld evidence and avoided answering questions that would lead to this discoverable evidence. PPL has caused the complainant to ask extensive questions to find the withheld evidence existed. PPL's unethical discovery practices have squandered time and resources finding information that should have already been provided by PPL. This gives the Complainant an unfair disadvantage and discriminates against his due process rights to discovery. The Complainant is a pro-se applicant, and has limited funds to survive the defense of a company with unlimited resources. PPL has proved case after case in front of the PUC. That PPL will use all means to win their case even if they are wrong. This upcoming evidentiary hearing in front of the PUC must be even. The value of this information that is being withheld from PPL outweighs the costs to this complaint. It is crucial to this complaint that the PUC order PPL to release this information. PPL has sole access to all the information needed to prove this Complaint. PPL will not release this information without the help from the PUC.

16. On 06/06/2023, a third incident involving damage to PPL utilities in the alleged ROW on the complainant's property caused power outages and live electrical wires to fall on the complainant's property. No information regarding this matter has been submitted to the Complainant. Complainant has submitted Interrogatories Set I & Request for Production of Documents answered by PPL on 06/17/2024. PPL has failed to disclose this information. The actions of PPL and Post & Schell have caused additional questions and has extended discovery times. This gives the Complainant an unfair disadvantage and discriminates against his due process rights to discovery. The Complainant is a pro-se applicant, and has limited funds to survive the defense of a company with unlimited resources. PPL has proved case after case in front of the PUC. That PPL will use all means to win their case even if they are wrong. This upcoming evidentiary hearing in front of the PUC must be even. The value of this information that is being withheld from PPL outweighs the costs to this complaint. It is crucial to this complaint that the PUC order PPL to release this information. PPL has sole access to all the information needed to prove this Complaint. PPL will not release this information without the help from the PUC.

ARGUMENT # 3

17. These three accidents involving PPL owned utility poles and wires, in an alleged ROW on the Complainants property and involved the Complainant. These accidents occurred on 04/13/23, 05/25/24, & 06/06/23. Knowing the names of the PPL employees and contractors involved along with their contact information, such as work emails, work cell phone numbers, and work addresses who may be called as witnesses is vital. These employees and/or subcontractors involved made repairs to PPL owned utility poles and wires in the PPL ROW. They have first hand knowledge of the ROW conditions on these days. These employees have not submitted any notes, documents, reports or any other information that is direct subject matter to this Complaint. PPL has denied employees and/or subcontractors in these incidents to answer any questions regarding these incidents. PPL has only provided only two accident reports into discovery, for 04/13/23 and 05/25/23. Complainant has the right to ask questions to these employees about this information PPL has submitted into discovery. This material is hearing pretrial material. PPL must submit all vegetation management, pole inspection, pole maintenance, pole repair, or replacement information, and its records for PPL owned utilities on the Complainants property. Complainant is accusing PPL of public safety violations under PA Title 66 Chapter 15 Section 1501,

PA Title 66 Chapter 15 Section 1501 - Character of service and facilities

Every public utility shall furnish and maintain adequate, efficient, safe, and reasonable service and facilities, and shall make all such repairs, changes, alterations, substitutions, extensions, and improvements in or to such service and facilities as shall be necessary or proper for the accommodation, convenience, and safety of its patrons, employees, and the public. Such service also shall be reasonably continuous and without unreasonable interruptions or delay. Such service and facilities shall be in conformity with the regulations and orders of the commission. Subject to the provisions of this part and the regulations or orders of the commission, every public utility may have reasonable rules and regulations governing the conditions under which it shall be required to render service. Any public utility service being furnished or rendered by a municipal corporation beyond its corporate limits shall be subject to regulation and control by the commission as to service and extensions, with the same force and in like

manner as if such service were rendered by a public utility. The commission shall have sole and exclusive jurisdiction to promulgate rules and regulations for the allocation of natural or artificial gas supply by a public utility.

The complainant is entitled to review these documents which will lead to discoverable material in this case. There are pictures and accident reports which contain details of the condition of PPL utilities in its alleged ROW on the day of these accidents. Additional investigation into PPL's records will reveal more discoverable material. PPL has sole access to this information. This information is public information. PPL is a billion dollar company with a large law firm Post & Schell representing them. PPL has several attorneys, paralegals and employees from multiple departments working against this complaint, and is withholding evidence. Complainant has to make a case where PPL holds all the evidence. This gives the Complainant an unfair disadvantage and discriminates against his due process rights to discovery. The Complainant is a pro-se applicant, and has limited funds to survive the defense of a company with unlimited resources. PPL has proved case after case in front of the PUC. That PPL will use all means to win their case even if they are wrong. This upcoming evidentiary hearing in front of the PUC must be even. The value of this information that is being withheld from PPL outweighs the costs to this complaint. It is crucial to this complaint that the PUC order PPL to release this information. PPL has sole access to all the information needed to prove this Complaint. PPL will not release this information without the help from the PUC. If the PUC wants to know the truth about this matter it is in these records in which PPL is withholding from the Complainant.

18. April Maire has been asked approximately a total of 52 questions through one deposition. (See PPL appendix B April Marie deposition questions) 0 questions have been answered. All questions have been objected to by PPL. (See appendix 8 PPL objections of April Marie) PPL has provided dozens of documents relating to several employees into discovery for pre hearing preparation material. (See Appendix 1 PPL discovery documents.) Complainant has not questioned this witness and found that documents provided by PPL were irrelevant to this case. No further questions have been asked of this witness. Any witness with admissible evidence was questioned further. There are dozens of witnesses that many could be asked questions for this Complainant. The Complainant has only asked the right amount of

questions to certain witnesses. Questioning was stopped if the information or evidence was irrelevant to this matter. Complainant only questioned witnesses after receiving information through discovery from PPL. The questions asked is based on the evidence provided by PPL. The Complainant did not go out of the scope of discovery. The Complainant asked questions based on documentation, answers to interrogatories, and depositions provided by PPL during discovery.

19. Barbara Shumlas has been asked approximately a total of 22 questions through one deposition. (See PPL appendix B Barbara Shumlas deposition questions) Zero questions have been answered. All questions have been objected to by PPL. (See appendix 8 PPL objections of Barbara Shumlas) PPL has provided dozens of documents relating to several employees into discovery for pre hearing preparation material. (See Appendix 1 PPL discovery documents.) Complainant has not questioned this witness. Many documents provided by PPL were irrelevant to this case. No further questions have been asked of this witness. Any witness with admissible evidence was questioned further. There are dozens of witnesses that could be asked questions for this Complainant. The Complainant has only asked the right amount of questions to certain witnesses and stopped questioning if the evidence was irrelevant to this matter. Complainant only questioned witnesses after receiving information through discovery from PPL. The questions asked were based on the evidence provided by PPL. The Complainant did not go out of the scope of discovery. The Complainant asked questions based on documentation, answers to interrogatories, and depositions provided by PPL during discovery.

20. Kimberly Hanson has been asked approximately a total of 55 questions through one deposition. (See PPL appendix B Kimberly Hanson deposition questions) 29 questions have been answered.(See appendix 8 Kim Hanson answers to deposition questions.) 26 questions have been objected to by PPL. (See appendix 12 PPL objections of Kimberly Hanson) PPL has provided dozens of documents relating to several employees into discovery for pre hearing preparation material. (See Appendix 1 PPL discovery documents.) Complainant has questioned this witness and found that many documents provided by PPL were irrelevant to this case. No further questions have been asked of this witness. Any witness with admissible evidence was questioned further. There are dozens of witnesses that could be asked questions

for this Complainant. The Complainant has only asked the right amount of questions to certain witnesses and stopped questioning if the evidence was irrelevant to this matter. Complainant only questioned witnesses after receiving information through discovery from PPL. The questions were directed at the evidence provided. The questions asked were based on the evidence provided by PPL. The Complainant did not go out of the scope of discovery. The Complainant asked questions based on documentation, answers to interrogatories, and depositions provided by PPL during discovery.

21. Michael Shaeffer has been asked approximately a total of 105 questions through one deposition. (See PPL appendix B Michael Shaeffer deposition questions) Zero questions have been answered. All questions have been objected to by PPL. (See appendix 11 PPL objections of Michael Shaffer)There is a pending motion to compel discovery for objection questions for this matter. PPL has provided dozens of documents relating to several employees into discovery for pre hearing preparation material. (See Appendix 1 PPL discovery documents.) Complainant has not questioned this witness. Further questions have been asked of this witness. John Rosato retired on 01/01/25 before he answered any questions. Michael Schaeffer is another PPL employee who worked on 04/13/23 during the first incident. He is the only other known employee to work on this day. PPL has provided documentation providing this employee has logged 6.5 hours of labor for this incident. Michaels testimony and documentation from this incident and from any other incident he may have been involved in resolving incidents in this complaint needs to be disclosed by PPL. Without this testimony there is only an incident report. Property damage report # 12951338 was not filled out correctly. Much of the information is left blank. (See appendix 1 discovery documents). This gives the Complainant an unfair disadvantage and discriminates against his due process rights to discovery. The Complainant is a pro-se applicant, and has limited funds to survive the defense of a company with unlimited resources. PPL has proved case after case in front of the PUC. That PPL will use all means to win their case even if they are wrong. This upcoming evidentiary hearing in front of the PUC must be even. The value of this information that is being withheld from PPL outweighs the costs to this complaint. It is crucial to this complaint that the PUC order PPL to release this information. PPL has sole access to all the information needed to prove this Complaint. PPL will not

release this information without the help from the PUC. If the PUC wants to know the truth about this matter it is in these records in which PPL is withholding from the Complainant.

22. Shani Hujisa has been asked approximately a total of 53 questions through one deposition. (See PPL's appendix B Shani Hujisa deposition questions) 27 questions have been answered (See appendix 13 Shani Hujisa's Answers to deposition questions) . 26 questions have been objected to by PPL. (See appendix 8 PPL objections of Shani Hujisa) PPL has provided dozens of documents relating to several employees into discovery for pre hearing preparation material. (See Appendix 1 PPL discovery documents) Complainant has questioned this witness and found that many documents provided by PPL were irrelevant to this case. No further questions have been asked of this witness. Any witness with admissible evidence was questioned further. There are dozens of witnesses that could be asked questions for this Complainant. The Complainant has only asked the right amount of questions to certain witnesses and stopped questioning if the evidence was irrelevant to this matter. Complainant only questioned witnesses after receiving information through discovery from PPL. The questions asked were based on the evidence provided by PPL. The Complainant did not go out of the scope of discovery. The Complainant asked questions based on documentation, answers to interrogatories, and depositions provided by PPL during discovery.

23. PPL has been asked approximately a total of 40 questions through one deposition. (See PPL appendix B PPL's Deposition questions) 22 questions have been answered. (See appendix 14 answers to deposition questions) 18 questions have been objected to by PPL. (See appendix 8 PPL objections of PPL) PPL has provided dozens of documents relating to several employees into discovery for pre hearing preparation material. (See Appendix 1 PPL discovery documents.) Complainant has questioned this witness and found that many documents provided by PPL were irrelevant to this case. PPL has provided dozens of documents relating to several employees into discovery for pre hearing preparation material. (See Appendix 1 PPL discovery documents) Complainant has questioned this witness and found that documents provided by PPL were irrelevant to this case. Further questions through interrogatories have been asked of this witness. PPL the main actor in this case. Instead of continuing questions through depositions. Complainant has continued to question PPL through Interrogatories. Any witness with

admissible evidence was questioned further. There are dozens of witnesses that could be asked questions for this Complainant. The Complainant has only asked the right amount of questions to certain witnesses and stopped questioning if the evidence was irrelevant to this matter. Complainant only questioned witnesses after receiving information through discovery from PPL. The questions asked were based on the evidence provided by PPL. The Complainant did not go out of the scope of discovery. The Complainant asked questions based on documentation, answers to interrogatories, and depositions provided by PPL during discovery.

24. John Rosato has been asked approximately a total of 140 questions through two depositions. (See PPL appendix B John Rosato deposition set 1 & 2 questions) Zero questions have been answered. 135 questions have been objected to by PPL. (See appendix 8 PPL objections of John Rosato) There is a pending motion to compel for objected questions. Five questions have never been answered by this witness.(See Appendix 15 Answers from PPL H&R Department) PPL states this employee has retired and will not be able to answer deposition questions. PPL has provided dozens of documents relating to several employees into discovery for pre hearing preparation material. (See Appendix 1 PPL discovery documents.) Complainant has not questioned this witness and found that many documents provided by PPL were irrelevant to this case. Further questions have been asked of this witness. John Rosato responded to the incident on 04/13/23. He wrote the incident report on that day. John seems to be the main employee involved with completing repairs on that day. He worked with several other PPL employees or subcontractors the day of this incident. PPL live utility poles and wires fell to ground on the Complainants property causing a public safety issue. Not one question about this incident has been answered by this employee. Not one question about documentation submitted into discovery by this employee has been answered. PPL has objected to every single relevant question asked by the Complainant. All PPL has released was some personal information about this employee. PPL has withheld all relevant information. Without this testimony there is only an incident report. Property damage report # 12951338 was not filled out correctly. Much of the information is left blank. (See appendix 1 discovery documents). This gives the Complainant an unfair disadvantage and discriminates against his due process rights to discovery. The Complainant is a pro-se applicant, and has limited funds to survive the defense of a company with

unlimited resources. PPL has proved case after case in front of the PUC. That PPL will use all means to win their case even if they are wrong. This upcoming evidentiary hearing in front of the PUC must be even. The value of this information that is being withheld from PPL outweighs the costs to this complaint. It is crucial to this complaint that the PUC order PPL to release this information. PPL has sole access to all the information needed to prove this Complaint. PPL will not release this information without the help from the PUC. If the PUC wants to know the truth about this matter it is in these records in which PPL is withholding from the Complainant.

25. Tim Roberts has been asked approximately a total of 140 questions through two depositions. (See PPL Appendix B Tim Roberts deposition questions set 1 & 2) 135 questions have been objected to by PPL. (See appendix 8 PPL objections of Tim Roberts). PPL has provided dozens of documents relating to several employees into discovery for pre hearing preparation material. (See Appendix 1 PPL discovery documents.) There is a pending motion to compel discovery for objection questions. Complainant has questioned this witness and found that many documents provided by PPL were irrelevant to this case. Further questions have been asked of this witness. Five questions have been answered by this witness below; (See Appendix 30 Tim Roberts answers to deposition questions)

Q. Please state your name and office address?

A. My name is Tim Roberts.

Q. 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?

A. High School Diploma, Abington Heights High School, 1999.

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

A. PPL Electric Utilities.

Journeyman Lineman (2014-present)

Journeyman Lineman Trainee (2011-2014)

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

A. Journeyman Lineman

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

A. I was a lineman (trainee or journeyman) from 2005 through 2008 and again 2011 through present, and I have held my current position for 10 years.

Tim Roberts responded to the incident on 05/25/23, he wrote the incident report on that day. Tim seemed to be the main employee involved with completing repairs on that day. Tim worked with several other PPL employees and subcontractors to restore power and repair PPL owned utilities on that day. PPL live utility poles and wires fell to ground on the Complainants property causing a public safety issue. The Complainant has sent deposition questions set 1 to Tim Roberts. PPL has objected to the line of questions for 33 of the 38 questions. PPL reasoning for these objections were, the questions were " Vague, overly broad, unduly burdensome, incomprehensible, duplicative, an improper use of discovery" Amongst other blanket objections that PPL has made. The Complainant was forced to send a second set of deposition questions to this employee. This time the Complainant asked similar questions in a different manner and added additional questions so that PPL would be able to answer this deposition. PPL has also objected to every single question in the second deposition request. Not one question about this incident has been answered by this employee. Not one question about documentation submitted into discovery by this employee has been answered. PPL has objected to every single relevant question asked by the Complainant. All PPL has released was some personal information about this employee. PPL has withheld all relevant information. Without this testimony there is only an incident report. Property

damage report # 12963169 was not filled out correctly. Much of the information is left blank. (See appendix 1 discovery documents). This gives the Complainant an unfair disadvantage and discriminates against his due process rights to discovery. The Complainant is a pro-se applicant, and has limited funds to survive the defense of a company with unlimited resources. PPL has proved case after case in front of the PUC. That PPL will use all means to win their case even if they are wrong. This upcoming evidentiary hearing in front of the PUC must be even. The value of this information that is being withheld from PPL outweighs the costs to this complaint. It is crucial to this complaint that the PUC order PPL to release this information. PPL has sole access to all the information needed to prove this Complaint. PPL will not release this information without the help from the PUC. If the PUC wants to know the truth about this matter it is in these records in which PPL is withholding from the Complainant.

26. Bill Farber has been asked approximately a total of 112 questions through two depositions. (See PPL Appendix B Bill Farber deposition set I & II questions) 88 questions have been objected to by PPL. (See appendix 9 PPL objections of Bill Farber). 24 questions have been answered by this witness. (See appendix 16 Bill Farber's answers to deposition questions) PPL has provided dozens of documents relating to several employees into discovery for pre hearing preparation material. (See Appendix 1 PPL discovery documents.) Complainant has questioned this witness and found that many documents provided by PPL were irrelevant to this case. Further questions have been asked of this witness. This is the only known manager involved in this matter. He has not answered any relevant questions in this matter because PPL has objected to all of them. This is because PPL has objected to those questions. There is a current motion to compel discovery pending for this discovery for questions relating to this complaint. This gives the Complainant an unfair disadvantage and discriminates against his due process rights to discovery. The Complainant is a pro-se applicant, and has limited funds to survive the defense with a company with unlimited resources. PPL has proven case after case in front of the PUC. That PPL will use all means to win their case even if they are wrong. This upcoming evidentiary hearing in front of the PUC must be even. The value of this information that is being withheld from PPL outweighs the costs to this complaint. It is crucial to this complaint that the PUC order PPL to release this information. PPL has sole access to all the information needed to prove this Complaint. PPL will not release this information without the help

from the PUC. If the PUC wants to know the truth about this matter it is in these records in which PPL is withholding from the Complainant.

27. Tom Kernoschak has been asked approximately a total of 224 questions through five depositions. (See PPL B Tom Kernoschak deposition set I, II, IV, & V questions) 76 questions have been objected to by PPL. (See appendix 8 & 10 PPL objections of Tom Kernoschak Depositions set I & V).PPL has provided dozens of documents relating to several employees into discovery for pre hearing preparation material. (See Appendix 1 PPL discovery documents.) Complainant has questioned this witness and found that many documents provided by PPL were irrelevant to this case. Further questions have been asked of this witness. 148 questions have been answered by this witness. (See appendix 17, 18, 19, & 20 Tom Kernoschak answers to depositions set I, II, III, IV questions) There is a pending motion to compel discovery for objected questions)

Tom Kernoschak is an engineering specialist who met the Complainant at the Complainants property on several occasions. Complainants exchanged phone calls, voicemails, text messages, and emails about PPL utilities, PPL ROW, how to get service on the Complainants property, and other matters relating to PPL utilities on the complainants property. Tom Kernoschak made several pole design drawings for PPL utilities running through the property of the Complainant. Tom Kernoschak was involved in decision making for matters in this complaint. Tom Kernoschak has not submitted notes, documentation or any information put into software such as MOM or WAM during his visits to the Complainant's property or about issues in this Complaint. Nor has he submitted any work phone calls,work text messages, or work email data in regards to matters in this complaint. This gives the Complainant an unfair disadvantage and discriminates against his due process rights to discovery. The Complainant is a pro-se applicant, and has limited funds to survive the defense of a company with unlimited resources. PPL has proved case after case in front of the PUC. That PPL will use all means to win their case even if they are wrong. This upcoming evidentiary hearing in front of the PUC must be even. The value of this information that is being withheld from PPL outweighs the costs to this complaint.

It is crucial to this complaint that the PUC order PPL to release this information. PPL has sole access to all the information needed to prove this Complaint. PPL will not release this information without the help from the PUC. If the PUC wants to know the truth about this matter it is in these records in which PPL is withholding from the Complainant.

28. Daniel Walker has been asked approximately a total of 249 questions through five depositions. (See PPL appendix B Daniel Walker deposition set I, II, III, IV, & V questions) 121 questions have been objected to by PPL. (See appendix 8, 9, & 10 PPL objections of Daniel Walker Deposition set I, II, & V). There is a pending motion to compel discovery for objected questions. PPL has provided dozens of documents relating to several employees into discovery for pre hearing preparation material. (See Appendix 1 PPL discovery documents.) 128 questions have been answered by this witness. (See appendix 22, 24, 23, & 21 Daniel Walker answers to deposition questions.) Complainant has questioned this witness and found that many documents provided by PPL were irrelevant to this case. Further questions have been asked of this witness.

Daniel Walker is the ROW specialist who met the Complainant at the Complainants property on several occasions. Complainants exchanged phone calls, voicemails, text messages, and emails about PPL utilities and PPL ROW on the Complainants property. Daniel Walker made several ROW decisions for PPL utilities running through the property of the Complainant. Daniel Walker was involved in decision making for matters in this complaint. Daniel Walker has not submitted notes, documentation, or any information put into software such as MOM or WAM during his visits to the Complainant's property or about issues in this Complaint. Nor has he submitted any work phone calls, work text messages, or work email data in regards to matters in this complaint. This gives the Complainant an unfair disadvantage and discriminates against his due process rights to discovery. The Complainant is a pro-se applicant, and has limited funds to survive the defense of a company with unlimited resources. PPL has proved case after case in front of the PUC. That PPL will use all means to win their case even if they are wrong. This upcoming evidentiary hearing in front of the PUC must be even. The value of this information that is being withheld from PPL outweighs the costs to this complaint. It is crucial to this complaint that the

PUC order PPL to release this information. PPL has sole access to all the information needed to prove this Complaint. PPL will not release this information without the help from the PUC. If the PUC wants to know the truth about this matter it is in these records in which PPL is withholding from the Complainant.

29. PPL has been asked approximately a total of 194 questions through Interrogatories and Requests For Production Of Documents. (See PPL appendix B PPL Interrogatories set I, II, III, IV, & V and Request For Production Of Documents set I). 54 questions have been objected to by PPL. (See appendix 5, 6, & 7 PPL objections of PPL.) 56 questions have been answered by this witness. (See appendix 26, 27, 28, & 29 PPL answer to Interrogatories questions) 86 Questions have never been answered. There is pending motion to compel discovery for unanswered and not objected to questions. PPL has provided dozens of documents relating to several employees into discovery for pre hearing preparation material. (See Appendix 1 PPL discovery documents.) Further questions have been asked of this witness. The answers provided by PPL and PPL employees in conjunction with the dozens of documents provided by PPL, has led to the questioning asked to PPL and PPL employees. Complainant has questioned this witness and found that many documents provided by PPL were irrelevant to this case. The evidence provided by PPL in appendix 1 is ample evidence that the Complainants line of questioning was directed at specific employees, with specific knowledge of evidence. PPL has made this effort to obtain evidence extremely difficult. Documents, evidence, employees, and subcontractors were supposed to be disclosed in June of 2024 when PPL answered the Complainants Interrogatories Set I and Request for production of documents set I. The Complainant was an ordinary member of the public before this began. He has no experience dealing with the PUC, and little to no experience dealing with PPL. PPL withheld this information and avoided answering questions that would lead to the discovery of evidence. PPL has effectively caused the Complainant to ask dozens of unnecessary questions needed to find this relevant information. After PPL has disclosed certain documentation the Complainant realized a tremendous amount of admissible evidence was missing from discovery. PPL still denies this information to this day. PPL has caused extended question and the discovery process to be extended by more than 6 months. This gives the Complainant an unfair disadvantage and discriminates against his due process rights to

discovery. The Complainant is a pro-se applicant, and has limited funds to survive the defense of a company with unlimited resources. PPL has proved case after case in front of the PUC. That PPL will use all means to win their case even if they are wrong. This upcoming evidentiary hearing in front of the PUC must be even. The value of this information that is being withheld from PPL outweighs the costs to this complaint. It is crucial to this complaint that the PUC order PPL to release this information. PPL has sole access to all the information needed to prove this Complaint. PPL will not release this information without the help from the PUC. If the PUC wants to know the truth about this matter it is in these records in which PPL is withholding from the Complainant.

30. PPL's practices have allowed individual employees to use work devices to communicate with the Complainant. These devices include PPL provided work cell phones and PPL provided email addresses. These communication practices of PPL employees were also used to communicate with other employees about matters in this complaint. Emails and phone use such as text messages have been used to record data about matters in this complaint and are extensions of work orders. Since PPL has allowed this practice to continue, Important records and documentation are being sent through these channels. Complainant is entitled to disclosure of this important information sent through work devices that are not privileged. This information is public record. This information has been sent during work hours about matters involving this Complaint, on PPL work devices. This data is required to be recorded and maintained for recordkeeping and this legal matter. This gives the Complainant an unfair disadvantage and discriminates against his due process rights to discovery. The Complainant is a pro-se applicant, and has limited funds to survive the defense of a company with unlimited resources. PPL has proved case after case in front of the PUC. That PPL will use all means to win their case even if they are wrong. This upcoming evidentiary hearing in front of the PUC must be even. The value of this information that is being withheld from PPL outweighs the costs to this complaint. It is crucial to this complaint that the PUC order PPL to release this information. PPL has sole access to all the information needed to prove this Complaint. PPL will not release this information without the help from the PUC. If the PUC wants to know the truth about this matter it is in these records in which PPL is withholding from the Complainant.

ARGUMENT # 4

31. Tom Kernoschak and Daniel Walker are two of the main employees involved in this Complaint. Their actions and their inactions have caused three accidents on the Complainants property. These employees have evaluated the Complainants property before the accidents, in between accidents, and after accidents. None of the field information from these employees have been disclosed. This information is crucial to this Complaint. Without this information the Complainant will have PPL employees testimony as to the version of events that took place. Complainant cant compare this testimony with past notes records, or documentation. Record Keeping is required by PPL employees to log each contact for a work order. This has not been provided. These PPL employees communicated using work cell phones and work emails as part of their work practices. Without data from these employees including work emails, text messages, voicemails, and or call logs about matters in this Complaint, more discoverable evidence will be lost. This gives the Complainant an unfair disadvantage and discriminates against his due process rights to discovery. The Complainant is a pro-se applicant, and has limited funds to survive the defense of a company with unlimited resources. PPL has proved case after case in front of the PUC. That PPL will use all means to win their case even if they are wrong. This upcoming evidentiary hearing in front of the PUC must be even. The value of this information that is being withheld from PPL outweighs the costs to this complaint. It is crucial to this complaint that the PUC order PPL to release this information. PPL has sole access to all the information needed to prove this Complaint. PPL will not release this information without the help from the PUC. If the PUC wants to know the truth about this matter it is in these records in which PPL is withholding from the Complainant.

C.

CONCLUSION

32. PPL accusations that the complainant engaged in bad faith discovery through excessive filing is moot. PPL has objected to 100s of complainant's questions. PPL has not answered 100s of complainant's questions. Subpoenas and motion to compel discovery are still pending for these matters. Complainant denies all allegations made by PPL in this protective order. For all reasons listed in this brief. PPL has not met the burden of proof to the claim of bad faith discovery on the complainants behalf. Nor did PPL produce a single document into evidence showing bad faith discovery towards any PPL employee. PPL has only produced slander towards the complainant. Further all evidence being withheld by PPL should be disclosed. For the reasons listed in this brief and set forth in this conclusion PPL Protective Order should be denied:

PPL, being in violation of vegetation management standards set forth by the state of PA, has led to three accidents occurring on the Complainants property. These accidents involved PPL utility poles and wires in an alleged ROW on the Complainants property. These three incidents have put the Complainant and the public's safety at risk. It has caused property damage, and outages, some outages lasting over a two week period. In order to obtain the information needed to prove PPL is in violation of these laws. Specific information is needed. PPL has not disclosed that certain information even existed to the Complainant. This evidence does exist, and PPL is in sole possession of the information. In order to hold PPL accountable for its actions, this information must be disclosed. PPL is responsible for each of these three accidents by their negligence in vegetation management, inspection and maintenance practices. This led up to these accidents happening, and for these three accidents to occur. This is in violation of Pa Title 66 Chapter 15 Section 1501.

Both PPL and its attorneys Post & Schell have discriminated against the Complainant's right to due process during the discovery phase. PPL has throughout discovery made false allegations of Complainants "bad faith" or "improper" discovery methods. Complainant briefs do not fall under this category. Post & Schell is trying to cast an unfavorable image of the complainant. PPL has not presented any evidence with their objections of " bad faith" or "improper discovery". These questions are not meant to cause unreasonable annoyance or unreasonable harassment to its employees. These questions are direct

questions to PPL and PPL employees seeking the truth and data which they hold for subject matter in this complaint and are required by due process and rules of civil procedure law to disclose this evidence.

The questions in Depositions, Interrogatories, and the information sought are reasonable requests. The questions to PPL and PPL employees are reasonable. Not only because they have direct subject matter to this complaint. Complainant is questioning documentation PPL has provided during discovery. There is a need for further questioning of PPL and PPL employees for documentation and evidence that is still being withheld by PPL and matters in the amended formal complaint. The value of this evidence outweighs the cost of this evidence. This is public information, this information by law has to be readily available to PPL. It is PPL's duties as an EDC operating in the State Of PA, to PPL maintain these records.

PPL has required Complainant to submit over two dozen briefs throughout the discovery process; these briefs involved hundreds of questions. Many of these answers provided by PPL are inaccurate, answered insufficiently, objected to or not answered at all. The Complainant has been required to file three motions to compel discovery. PPL discovery tactics have discriminated against the Complainant.

The State Of PA does not ask PPL to keep records of its distribution system, it requires PPL as a group 1 class A EDC operating in the State of PA to compile data and maintain this data. PPL gathers this information all year and then releases this information on a quarterly and a yearly basis through several different outlets. A Quarterly Reliability Report, Annual Reliability Report, Annual Optimization Plan, The long term Infrastructure Improvement Plan and the Biennial Plan. This data is then disclosed to the public via The PUC and the PUC website. (See Document # M-2009-2094773 PPL Biennial Plan) (See above plans and reports available at the PUC website for PPL) (PUC Right to Know Policy). This is public information readily available from PPL. Since PPL has already compiled this data and released it to the public through the above plans and reports. Charts and diagrams on these reports and plans are proof of the data PPL has already compiled. Complainant who is a member of the public and has a right to this data. Furthermore the Complainant has been a victim of several accidents involving PPL Utilities

located in a PPL ROW on the Complainants property for PPL's distribution system. PPL does not dispute these accidents (see PPL Answers To The Amended Formal Complaint Of Nieves Abad).

Documents required under Title 52 Chapter 57 Section 57.28(D) ,Title 52 Chapter 57 Section 57.47, and Title 52 Chapter 57 Section 57.198(M) are public information. This data collected by PPL must be made available to The Commission and its staff. The PUC is a public entity. The information that the PUC can obtain is of public record. The preservation of records requires that the data compiled for these records be kept and preserved by PPL as a Group 1 Class A EDC operating in the State Of PA. (See Docket L-00030160 Rule Making) These records are readily available to PPL since this data has been compiled and submitted to the PUC.

The complainant is well within the scope of discovery governing an evidentiary hearing in front of the PUC. All the evidence requested falls in the category of hearing preparation material and is the complainants due process right to obtain from PPL. This evidence is not vague, overly broad, unduly burdensome, duplicative, or an improper bad faith use of discovery other than its forcing ppl to disclose the truth. PPL by law is required to compile and store this data. This data is readily available to PPL. PPL should want the truth to come out to show it is in compliance with PA state and its utilities are safe for the public. PPL is under the continuing duty to supplement answers to questions during discovery PPL is a multi billion dollar corporation with unlimited resources. PPL has several in-house attorneys and multiple employees and subcontractors working on its defense in this complaint from multiple departments. PPL has hired post & Schell who also have several attorneys and paralegals working to defend PPL. The Complainants case is dependent on information that PPL is in sole control over. Without this evidence the Complaint may not survive the defense PPL is preparing for. This information is pre hearing material. Giving PPL a protective order would allow PPL to continue to withhold this evidence. This gives the Complainant an unfair disadvantage and discriminates against his due process rights to discovery. The Complainant is a pro-se applicant, and has limited funds to survive the defense with a company with unlimited resources. PPL has proven case after case in front of the PUC that PPL will use all means to win their case even if they are wrong. This upcoming hearing in front of the PUC must be even. The value

of this information that is being withheld from PPL outweighs the cost to this complaint. It is crucial to this complaint that the PUC order PPL to release this information. PPL has sole access to all the information needed to prove this Complaint. PPL will not release this information without the help from the PUC. This case will be going to trial. Without this information, PPL wins again.

Wherefore, Complainant asks the Commission to dismiss in full PPL request for protective order based on information provided above, ordering PPL to answer all questions from depositions and interrogatories, and/or any other relief this court may deem proper in this situation.

Alphonso Arnold III
Administrative Law Judge
Office of Administrative Law Judge
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
Email- alphonamo@pa.gov

Secretary of The Commission
Commonwealth Keystone Building
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



Nieves Abad
747 Delaware St
Forest City , PA 18421
Email- Martjua3@aol.com
Phone - 631-575-2348
Dated-March 17, 2025

Table Of Contents

A. <u>Complainant's Good Faith Discovery Vs PPL's Bad Faith Discovery</u>	p 1-11
1. Introduction	p 1
2. PPL Discovery documents	p 1-3
3. PPL false statements	p 3-4
4. ALJ decisions	p 4-5
5. Scope of discovery	p 6-10
6. Employee statements	p 10-11
B. <u>Documents and Information Requested</u>	p 11-37
7. Billing invoices	p 11-12
8. Work orders	p 12-13
9. Work and asset management software	p 13-14
10. Mobile work management software	p 14-15
11. Argument 1	p 15
12. Subcontractor Information	p 15-16
13. Osmose Information	p 16-17
14. Argument 2	p 17-22
15. Accident Information	p 22-23
16. Accident on 06/06/23	p 23
17. Argument #3	p 24-25
18. Deposition of April Marie	p 25-26
19. Deposition Barbara Shumlas	p 26
20. Deposition of Kim Hanson	p 26-27
21. Deposition of Michael Shaffer	p 27-28
22. Deposition of Shani Hujsa	p 28
23. Deposition of PPL	p 28-29
24. Deposition of John Rosato	p 29-30
25. Deposition of Tim Roberts	p 30-32
26. Deposition of Bill Farber	p 32-33
27. Deposition of Tom Kernoschak	p 33-34
28. Deposition of Daniel Walker	p 34-35
29. Deposition of PPL Interrogatories	p 35-36
30. Work Devices/Communications	p 36-37
31. Argument #4	p 37
C. <u>Conclusion</u>	p 38-41

32. Resolution	p 38-41
Table Of Contents	p 42-43
Appendix 1- PPL Discovery Documents	p 44-147
Appendix 2- Order granting in part and denying in part Respondents Preliminary Objections	P 148-156
Appendix 3-Pre trial hearing minutes	p 157-163
Appendix 4-Objections Of PPL Electric Utilities Corporation To The Interrogatories (Set 1)	P 164-168
Appendix 5-Objections of PPL Electric Utilities Corporation To The Request For Production Of Documents (Set 1)	p 169-177
Appendix 6- Objections Of PPL Electric Utilities Corporation To The Request For Interrogatories (Set II)	P 178-182
Appendix 7-Objections of PPL Electric Utilities Corporation To The Request For Interrogatories (Set IV)	P 183-191
Appendix 8-Objections Of PPL Electric Utilities Corporation To The Request For Written Depositions Of PPL Electric Utility Corporation, Daniel Walker, Kim Hanson,Shani Hujsa, Tom Kernoschack, John Rosato, Tim Roberts, Ann Marie, and Barbara Shumlas Set I	p 192-205
Appendix 9- Objections Of PPL Electric Utilities Corporation To Written Depositions Of Bill Farber Set I and Daniel Walker Set II	p 206-215
Appendix 10- Objections Of Written Depositions of Tom Kernoschak Set V, Daniel Walker V, Tim Roberts (Roberts Set II) Bill Farber Set II, and John Rosato Set II	p 216-267
Appendix 11- Objections Of PPL Electric Utilities Corporation To The Request For Written Deposition Directed At Michael Shaffer	p 268-282
Appendix 12-Answers To Written Deposition Of Kimberly Hanson	p 283-290
Appendix 13-Answers To Written Deposition Of Shani Hujsa	p 291-297
Appendix 14-Answers To Written Deposition Of PPL Electric Utilities Corporation	p 298-304
Appendix 15-Answers To Written Deposition Of John Rosato	p 305-307
Appendix 16-Answers To Written Deposition Of Bill Farber	p 308-314
Appendix 17-Answers To Written Deposition Of Tom Kernoschak (Set 1)	p 315-320
Appendix 18-Answers To Written Deposition Of Tom Kernoschak (Set 2)	p 321-323
Appendix 19-Answers To Written Deposition Of Tom Kernoschak (Set 3)	p 324-342
Appendix 20-Answers To Written Deposition Of Tom Kernoschak (Set 4)	p 343-354
Appendix 21-Answers To Written Deposition Of Daniel Walker (Set 4)	p 355-368
Appendix 22-Answers To Written Deposition Of Daniel Walker (Set 1)	p 369-375
Appendix 23-Answers To Written Deposition Of Daniel Walker (Set 3)	p 376-387
Appendix 24-Answers To Written Deposition Of Daniel Walker (Set 2)	p 388-392
Appendix 25-PPL Electric Utilities Corporation Responses To Interrogatories Set 1	p 393-397
Appendix 26-PPL Electric Utilities Corporation Responses Request For Production Of Documents Set 1	P 398-404
Appendix 27-PPL Electric Utilities Corporation Responses To Interrogatories Set II	p 405-420
Appendix 28-PPL Electric Utilities Corporation Responses To Interrogatories Set III	p 421-431
Appendix 29-PPL Electric Utilities Corporation Responses To Interrogatories Set IV	p 432-439
Appendix 30- Answers To Written Deposition of Tim Roberts	p 440-441



INVOICE NUMBER
91130032-3

INVOICE DATE
01/01/00

TOTAL AMOUNT
3,176.24

TWO NORTH NINTH STREET
ALLENTOWN PA 18101-1179

NIEVES P. ABAD
747 DELAWARE ST.
FOREST CITY, PA 18421

DATE OF DEPOSIT
MAR 15 2025

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

CONTROL ACCOUNT: 014350

MAKE CHECKS PAYABLE TO:
PPL Electric Utilities Corp

3 3900031762490003176249 9113003200

AMOUNT PAID

TO INSURE PROPER CREDIT, PLEASE RETURN THIS PORTION WITH PAYMENT IN ENCLOSED ENVELOPE
TO: PPL CORPORATION PO BOX 25222 LEHIGH VALLEY, PA 18002-5222

NIEVES P. ABAD
747 DELAWARE ST.
FOREST CITY, PA 18421

REFER ALL INQUIRIES TO:
OGC Claims Office 800-748-7104

PLEASE REFER TO THIS NUMBER WHEN
CALLING OR WRITING: 91130032-3

ITEM	DESCRIPTION	AMOUNT
1	Property Damage Cost of repairing damage to cur property located at Amity Court, Scranton, PA Incident date: April 13, 2023 WR # 58718837 Claim # 2023-00453	0.00
2	Labor	1,755.21
3	Vehicle Usage Charges	253.36
4	Materials	1,167.67

Payment Due: Net 30

91130032-3
INVOICE NUMBER

01/01/00
INVOICE DATE

3,176.24
TOTAL AMOUNT

PPL Electric Utilities Corp
TWO NORTH NINTH STREET, ALLENTOWN, PA 18101-1179

Appendix 1

Analytical Accounting Inquiry Report
Sales Transaction Entry

ch ID:

Document Number
30032

Document Type
Invoice

Dist #	Account Number	Description	Debit Amount	Credit Amount	Percentage	Trx. Dimension Code	Description	Debit Amount	Credit Amount
1		Other ar-property damage						\$3,176.24	\$0.00
Assign #			Debit Amount	Credit Amount	Percentage				
	Trx. Dimension	Description				Trx. Dimension Code	Description		
1			\$3,176.24	\$0.00	100.00%				
Assign Total:			\$3,176.24	\$0.00	100.00%				
2		Project BI Default						\$0.00	\$162.34
Assign #			Debit Amount	Credit Amount	Percentage				
	Trx. Dimension	Description				Trx. Dimension Code	Description		
1			\$0.00	\$162.34	100.00%				
	RC	Responsibility Center				400.00000			
	PROJECT	Project ID				499304.00000			
	SUBPROJECT	Sub Project				100.00000			
	BUDGET ITEM	Budget Item				90000	External Revenues		
Assign Total:			\$0.00	\$162.34	100.00%				
3		Project BI Default						\$0.00	\$1,701.66
Assign #			Debit Amount	Credit Amount	Percentage				
	Trx. Dimension	Description				Trx. Dimension Code	Description		
1			\$0.00	\$1,701.66	100.00%				
	RC	Responsibility Center				470.00000			
	PROJECT	Project ID				12951338.00000			
	SUBPROJECT	Sub Project				98.00000			
	BUDGET ITEM	Budget Item				90000	External Revenues		
Assign Total:			\$0.00	\$1,701.66	100.00%				
4		Project BI Default						\$0.00	\$1,005.33
Assign #			Debit Amount	Credit Amount	Percentage				
	Trx. Dimension	Description				Trx. Dimension Code	Description		
1			\$0.00	\$1,005.33	100.00%				
	RC	Responsibility Center				470.00000			
	PROJECT	Project ID				804300.00000			
	SUBPROJECT	Sub Project				1.00000			
	BUDGET ITEM	Budget Item				90000	External Revenues		
Assign Total:			\$0.00	\$1,005.33	100.00%				
5		Oth elec rev-genl						\$0.00	\$306.91
Assign #			Debit Amount	Credit Amount	Percentage				
	Trx. Dimension	Description				Trx. Dimension Code	Description		
1			\$0.00	\$306.91	100.00%				
	RC	Responsibility Center				400.00000			
Assign Total:			\$0.00	\$306.91	100.00%				

Billing Job Order Number Report

8/9/2023

BJO #: 12951338

Matter Number: 2023-00453

Party: Abad, Nieves P.

Address: 747 Delaware St.

City: Forest City

State: PA

Zip Code: 18421

Incident Date: 4/13/2023

Incident Type: DMP

Damage Loss Type: DMPOHF

Incident Location: 19 Amity Court

Municipality: Scranton

County: Lackawanna

State: PA

Grid Number: 57327N46297

Vehicle Make:

Incident Notes:

Insurance Unknown

Claim Notes:

Sub Project	Work Order	Budget Item	SRC	System Source	Journal ID	Vendor Name	Voucher - PSA	Catalog #	Actual Hours	Actual Hours	Actual Amount	Actual Amount
									ACT	BLD	ACT	BLD
EAM	12951338	11000	0453	PTL	AGBILL9083							184.14
EAM	12951338	11000	0453	PTL	PTL0018999	OT15CN		5.0		460.61		
EAM	12951338	11000	0453	PTL	PTL0018999	OT20CN		1.0		118.00		
EAM	12951338	11000	0453	PTL	PTL0018999	OTP15		0.0		34.93		
EAM	12951338	11000	0453	PTL	AGBILL0353				0.0			46.04
EAM	12951338	11000	0453	PTL	PTL0010248	OT15CN		0.0		0.00		
EAM	12951338	11000	0453	PTL	PTL0010248	OT20CN		1.5		176.99		
EAM	12951338	11000	0453	PTL	PTL0010248	OTP15		0.0		0.00		
EAM	12951338	11000	0451	PTL	AGBILL2431				0.0			76.73
EAM	12951338	11000	0451	PTL	PTL0012323	OT15PN		2.5		238.08		
EAM	12951338	11000	0451	PAC	PAC0012341	OT15PN		10.0		952.40		
EAM	12951338	11000	0451	PAC	PAC0012348	OT15PN		-10.0		-952.40		
EAM	12951338	11000	0451	PAC	PAC0012521	OT15PN		-10.0		-952.40		
EAM	12951338	11000	0451	PAC	PAC0012529	OT15PN		10.0		952.40		
EAM	12951338	69000	0453	PTL	LDG9009083			0.0		4.91		
EAM	12951338	69000	0453	PTL	LDG9000353			0.0		1.42		
EAM	12951338	69000	0451	PTL	LDG9002431			0.0		1.91		
EAM	12951338	69000	0451	PAC	LDG9002421			0.0		0.00		
EAM	12951338	69000	0451	PAC	LDG9002603			0.0		0.00		
EAM	12951338	69020	0453	PTL	LDG9209083			0.0		245.42		
EAM	12951338	69020	0453	PTL	LDG9200353			0.0		70.80		
EAM	12951338	69020	0451	PTL	LDG9202431			0.0		95.23		
EAM	12951338	69020	0451	PAC	LDG9202421			0.0		0.00		
EAM	12951338	69020	0451	PAC	LDG9202603			0.0		0.00		
										1,448.30	306.91	1,755.21
EAM		14000	0453	TRP	TRP0020291			0.0		77.63		
EAM		14000	0453	TRP	TRP0029038			0.0		100.19		
EAM		14000	0451	TRP	TRP0022354			0.0		12.13		
EAM		14000	0451	TRP	TRP0022625			0.0		3.10		
EAM		14000	0451	TRP	TRP0022625			0.0		-3.10		
EAM		14000	0453	ALP	ALP1000320			0.0		59.52		
EAM		14000	0451	ALP	ALP1002916			0.0		4.97		
EAM		14000	0451	ALP	ALP1005515			0.0		-1.08		
										253.36		
		24000		Material						1,005.33		
				Pole Disposal (2)						162.34		
										1,167.67		
EAM	EAM Sub-To							10.0	0.0	1,701.66	306.91	
Total								10.0	0.0	1,701.66	306.91	
	162.34	499304-100-400			Lab		1,755.21			306.91	A&G	
	1701.66	12951338-098-470			Veh		253.36			162.34	Pole Disp	
	1005.33	804300-1-470			Mat		1,167.67			1,005.33	Material	
	306.91	045610-400					3,176.24			3,176.24		
	3176.24											

Billing Detail Report - Decode to PPL Property Damage Invoice

Columns on the Bill Detail report which tie to Invoice

Labor

Payroll includes budget items: 11xxx, 13xxx, 33xxx, 49xxx, 69xxx; this code allows the company to group and track any payroll related costs - Payroll has 2 components (1) **Direct** - hourly rate plus items such as sick time and taxes and benefits (2) **Indirect** - two parts: **Administrative and general** - costs supporting utility operations but not chargeable to a particular operating function and **Overheads** - clearing process which allows cost distribution, such as foremen and engineering, over multiple projects which are identified in the budget items beginning with 69

Budget Item - Classifies transactions by resources consumed during a work activity

Budget Item	Description
11xxx-wages	Salaries, wages and benefits of all company employees
13xxx-employee expenses	Employee expenses
33xxx-services	Hourly basis consulting support where hourly rates are known via invoice and/or contract details
49xxx-miscellaneous	Items not properly classified under any other budget item
69xxx-clearing	Labor costs spread over multiple projects where it is impractical to direct charge individual projects

Supplying Responsibility Center is the organization which performs the work and generates the charge

SRC

System Source - Code which identifies the type of transaction and where the transaction originated

System Source	Description
ADJ IGL	Adjustments
CTL	Contractor Time & Labor
PSA IAP	Accounts Payable
PTL	PeopleSoft Time & Labor
YEC	Year-End Clearing

Journal ID An accounting transaction within the general ledger

Pay Code

Pay Code	Pay Code Description
MEAL	Meal Allowance
OT1.5	Overtime, Call Out or Prearranged Work @ 1.5
OT2.0	Call Out or Prearranged Work @ 2.0
OTP15	Overtime Premium @ 1.5
OTP20	Overtime Premium @ 2.0
REG	Regular Scheduled Hours
SP10	Shift Premium@1.0
SP15	Shift Premium@1.5

Pay codes built into our time and labor system based on our current I.B.E.W. Local 1600 Agreement

Materials

Material & Supplies	Description
Catalog #	Listing of specific material used for this job
Budget Item	Ties to the Material Catalog Number on the MR07 report
24xxx-stores issues & returns	Cost of materials and supplies requisitioned from or returned to stores

Vehicle Usage Charges

A portion of the cost of all vehicles owned by an SRC is allocated to each project worked on by that SRC based on the direct hours charged to the project regardless of the specific vehicles used. This approach is used consistently for all projects worked by PPL Operations.

Budget Item	Description
14xxx-vehicle & equipment	Cost of using company vehicles
System Source	Description
TRP	Transportation costs which include inspection, insurance, gas, maintenance, labor and registration
ALP ALO	Vehicle depreciation costs
YEC	Year-End Clearing

Each property damage incident uses a variety of PPL owned vehicles in the classes listed below:

Class 1	Sedan, Station Wagon, Backhoe
Class 2	Pickup, Service Body, Cargo Van, Explorer, Tractor Crawler, Crane Truck Tractor Stake Body w/ Crane, Hole Digger, Small Bucket Truck, Reel Tensioner Truck, Walk-In Van, Small Stake Body, Dump, Large Stake Body, Tanker
Class 3	Digger Derrick, Manlift, Trouble Truck, Manlift, Truck Tractor, Mat Handling Bucket
Class 4	High Reach Platform

Outside Contractors

PPL supplements its workforce with contracted labor, their cost is a direct pass through

Vendor Name	Name of Contractor used on this job
-------------	-------------------------------------

Additional codes that help ensure all dollars involved tie back to the specific project:

Sub Project	Units of work that provide a further breakdown of projects - usually into specific tasks; resources are assigned directly to subproject within a project
Work Order	Unique number generated from our work management system to track costs and progress of each job
Actual Hours	Hours entered against the specific work order
Actual Costs	Costs collected against the specific work order

Business Use

CRC: 0470, Project Description:
 BJO-57327N46297-TREE CONFIR, Project ID:
 12951338

Property Damage Query - Shani

7/10/2023 12:11:23 PM

Sub Project	Work Order	Accounting Date	Budget Item	SRC	System Source	Journal ID	Vendor Name	Voucher - PSA	Catalog #	Sales Tax	Use Tax	Metrics Type	Actual Hours		Actual Amount	
													ACT	BLD	ACT	BLD
EAM		4/30/2023	14000	0453	TRP	TRP0020291				0.00	0.00		0.0		77.63	
						TRP0029038				0.00	0.00		0.0		100.19	
			14D00	0453	ALP	ALP1000320				0.00	0.00		0.0		59.52	
		5/31/2023	14000	0451	TRP	TRP0022354				0.00	0.00		0.0		12.13	
						TRP0022625				0.00	0.00		0.0		3.10	
			14D00	0451	ALP	ALP1002916				0.00	0.00		0.0		4.97	
		6/1/2023	14000	0451	TRP	TRP0022625				0.00	0.00		0.0		-3.10	
		6/30/2023	14D00	0451	ALP	ALP1005515				0.00	0.00		0.0		-1.08	
	12951338	4/16/2023			PTL	AGBILL9083				0.00	0.00		0.0			184.14
			11000	0453		PTL0018999		OT15CN		0.00	0.00		5.0		460.61	
								OT20CN		0.00	0.00		1.0		118.00	
								OTP15		0.00	0.00		0.0		34.93	
			69000	0453	PTL	LDG9009083				0.00	0.00		0.0		4.91	
			69020	0453	PTL	LDG9209083				0.00	0.00		0.0		245.42	
		4/30/2023			PTL	AGBILL0353				0.00	0.00		0.0			46.04
			11000	0453		PTL0010248		OT15CN		0.00	0.00		0.0		0.00	
								OT20CN		0.00	0.00		1.5		176.99	
								OTP15		0.00	0.00		0.0		0.00	
			69000	0453	PTL	LDG9000353				0.00	0.00		0.0		1.42	
			69020	0453	PTL	LDG9200353				0.00	0.00		0.0		70.80	
		5/28/2023	11000	0451	PTL	AGBILL2431				0.00	0.00		0.0			76.73
						PTL0012323		OT15PN		0.00	0.00		2.5		238.08	
			69000	0451	PTL	LDG9002431				0.00	0.00		0.0		1.91	
			69020	0451	PTL	LDG9202431				0.00	0.00		0.0		95.23	
		6/11/2023			PAC	PAC0012341		OT15PN		0.00	0.00		10.0		952.40	
			11000	0451		PAC0012348		OT15PN		0.00	0.00		-10.0		-952.40	
						PAC0012521		OT15PN		0.00	0.00		-10.0		-952.40	
						PAC0012529		OT15PN		0.00	0.00		10.0		952.40	
			69000	0451	PAC	LDG9002421				0.00	0.00		0.0		0.00	
						LDG9002603				0.00	0.00		0.0		0.00	
			69020	0451	PAC	LDG9202421				0.00	0.00		0.0		0.00	
						LDG9202603				0.00	0.00		0.0		0.00	

67

CRC: 0470, Project Description:
 BJO-57327N46297-TREE CONFIR, Project ID:
 12951338

Property Damage Query - Shani

7/10/2023 12:11:23 PM

Sub Project	Work Order	Accounting Date	Budget Item	SRC	System Source	Journal ID	Vendor Name	Voucher - PSA	Catalog #	Sales Tax	Use Tax	Metrics Type	Actual Hours		Actual Amount	
													ACT	BLD	ACT	BLD
EAM	EAM Sub-Total												10.0	0.0	1,701.66	306.91
Total													10.0	0.0	1,701.66	306.91

50



REPORT OF DAMAGE TO COMPANY PROPERTY

Day Thursday	Date 04/13/2023	Time 21:36	W.O. No. 58718837(6614663-1)	Resp. Center 453	Law Manager No.
Incident Location green place CT scranton PA 15509		City / Boro / Twp. scranton		County lacka	Grid No. 57327 N 46297 S
Operator Name		Telephone No. () -		Owner Name Telephone No. () -	
Address			Address		
City / Boro / Twp		State	Zip	City / Boro / Twp	
Operator's License No.		State	Vehicle Reg. No.		State
Trailer Reg. No.		State		VIN No.	
Make of Vehicle		Model		Year	
Investigating Police Dept. scranton		Incid./Report No. 23-11703		Address, If Known Telephone No. () -	
Check if Known <input checked="" type="checkbox"/> Overhead <input type="checkbox"/> Underground - Employee Dig - In <input type="checkbox"/> Underground - Contractor Dig - In <input type="checkbox"/> Underground - PPL Subcontractor Dig - In <input type="checkbox"/> Power Plant Facilities <input type="checkbox"/> Substation <input type="checkbox"/> PPL Recreation Facility <input type="checkbox"/> Company Vehicle (Unattended) <input type="checkbox"/> Serious/Fatal Injury <input type="checkbox"/> Other- _____		Weather / Light Conditions (Check all that Apply) <input type="checkbox"/> Rain <input type="checkbox"/> Fog <input type="checkbox"/> Clear <input type="checkbox"/> Snow / Ice <input type="checkbox"/> Windy <input type="checkbox"/> Other - _____ <input type="checkbox"/> Daylight <input type="checkbox"/> Dawn <input type="checkbox"/> Dusk <input type="checkbox"/> Darkness		Road Conditions (Check all that Apply) <input type="checkbox"/> Wet <input type="checkbox"/> Snow <input type="checkbox"/> Ice <input type="checkbox"/> Other - _____ <input type="checkbox"/> Rough <input type="checkbox"/> Smooth <input type="checkbox"/> Unimproved	
Describe Damage to Property and Briefly Describe Accident / Incident (Include Type and Extent of Damage) Police on Scene tree crews cutting trees broke 2 poles and 3 spans of secondary/ 2 poles to straighten-- REPAIR STATUS: Permanent; INCIDENT TYPE: TRE					
Owner's Insurance Company				Policy No.	
Address		Telephone No. () -		Agent Telephone No. () -	
Witness/Employee * 1. Address		Telephone No. () -		Witness/Employee * 2. Address	
Witness/Employee * 3. Address		Telephone No. () -		Witness/Employee * 4. Address	
INSTRUCTIONS Refer to OGC Claims Instructions for Completion See reverse side for sketch and additional information Please TYPE or PRINT * If witness is a PPL employee, enter only Name, Employee Number and Job Title * Resource Management will send completed form to OGC-Claims, GENTW5				<input type="checkbox"/> Permanent Repairs Required <input checked="" type="checkbox"/> All Work Completed	
				Prepared by Rosato, John	
				Employee No. 071944 Date 04/13/2023 21:36	

Check if Required:

<input type="checkbox"/> Inspection Only	<input type="checkbox"/> Switching	<input type="checkbox"/> Flagmen
<input type="checkbox"/> Temporary Cutouts/Sectionalizers	<input type="checkbox"/> Switching Permit #	
TRANSFORMER: <input type="checkbox"/> Repaired	<input type="checkbox"/> Scrapped	<input type="checkbox"/> Transferred

LIST OF MATERIAL

INSTALLED	REMOVED	TRANSFERRED	REQUIRED FOR PERMANENT REPAIR

OVERHEAD:

Pole Distance From Edge of Paved Surface to Face of Pole _____

Pole Distance From Centerline to Face of Pole _____ Pole Replaced in Location? Yes No

Height of Wire at Time of Damage _____ After Repairs _____

Over: Driveway _____ Road _____ Private Lane _____

Other _____

Height of Vehicle/Equipment _____

UNDERGROUND: (Dig-In Information)

Description and Type of Event (Explain and check all that apply) Dig-in Contractor Involved? YES NO
 Subcontractor Involved? YES NO

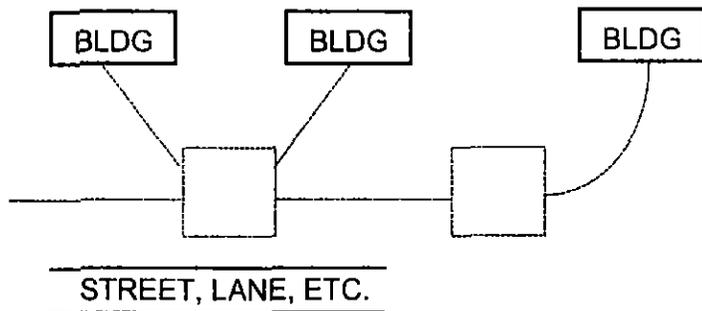
PPL Locator's Employee Number _____

Service Interrupted? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	POCS call in effect? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO If YES, POCS Ticket No.: _____	Billable Event? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	If not billable, explain why: _____
---	--	--	-------------------------------------

Line Marked: Yes: Paint Flags
 No

Distance From Dig-In To Marked Location: _____ Cable Depth: _____

REMARKS/ADDITIONAL INFORMATION:



Cable Type: Pri. Sec. S/L SVC
 INDICATE ON SKETCH:
 Route of Excavation:
 Paint Location:
 Flags/Stakes:
 Location of Dig-In:





Account No. 04766

PPL-PA

EM

Attention : Barbara Shumlas

PPL ELECTRIC UTILITIES

Metro Reporting Customer Support 1-800-245-6686 or help@metroreporting.com

Metropolitan Reporting Bureau
BOX 926, William Penn Annex
Philadelphia, PA 19105-0926
FAX (800) 343-9047

Type of Report: AUTO ACCIDENT

INSURED : PPL ELECTRIC UTILITIES

CLAIM NUMBER: 58718837 / 12951338

POLICY NUM. :

DATE OF LOSS: 04/13/23

LOSS STREET : GREEN PLACE CT

LOSS CITY : SCRANTON PA

POLICE DEPT.: SCRANTON

REPORT NUM. : 23-11703

PCT./DIST. :

DESC.OF OTHER: POLE HIT

THANK YOU FOR THE ORDER! Any questions or problems please feel free to contact
PH. (800) 245-6686 or Help@metroreporting.com

DATE OF DEPOSIT
MAR 15 2025
PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

NOTICE: The report/information provided to the end user (the Customer) most likely contains consumer identification information governed by the Federal Drivers Privacy Protection Act of 1994 (18 U.S.C. 2721 et seq.) (DPPA), the Gramm-Leach-Bliley Act (15 U.S.C. 6801 et seq.) (GLB), and the Fair Credit Reporting Act (15 U.S.C. 1681 et seq.) (FCRA), including all auto crash reports & all reports and information provided by state DMV'S.

Customer shall not use the information provided herein for any purpose that would violate the privacy obligation policy and any other terms and provisions of the DPPA, GLB or FCRA, or any similar federal, state or local statutes, rules, or regulations. The Customer is responsible for maintaining compliance; as such do not share report/information outside of your company. Any violation of these laws may subject you to civil and/or criminal penalties.

Customer understands that results/data received are not proprietary, as such are being provided by a third-party source and therefore the accuracy of such results/data is not guaranteed.



3331874745

53



Scranton Police Department



Summary

Print Date/Time: 04/20/2023 12:59
Login ID: kolgees
Case Number: 2023-00011703

Scranton Police Department
ORI Number: PA0350400

Case

Case Number: 2023-00011703
Location: 19 AMITY CT
Scranton, PA 18509
Reporting Officer ID: 43824 - DEBIASE

Incident Type: Other
Occurred From: 04/13/2023 17:57
Occurred Thru: 04/13/2023 18:45
Disposition:
Disposition Date:
Reported Date: 04/13/2023 17:57 Thursday

Offenses

No.	Group/ORI	Crime Code	Statute	Description	Counts
-----	-----------	------------	---------	-------------	--------

Subjects

Type	No.	Name	Address	Phone	Race	Sex	DOB/Age
Subject Interviewed	1	ABAD, NIEVES PASCUAL	747 DELAWARE ST FOREST CITY, PA 18421	(570)815-0829	White	Male	11/29/1980 42
Subject Interviewed	2	PATEL, LAKESHKUMAR DOB	853 CAPOUSE AVE Scranton, PA 18509	(570)877-4875	Asian/Pacific Islander	Male	10/22/1972 50

Arrests

Arrest No.	Name	Address	Date/Time	Type	Age
------------	------	---------	-----------	------	-----

Property

Date	Code	Type	Make	Model	Description	Tag No.	Item No.
------	------	------	------	-------	-------------	---------	----------

Vehicles

No.	Role	Vehicle Type	Year Make	Model	Color	License Plate	State
-----	------	--------------	-----------	-------	-------	---------------	-------

Reporting Officer

Date:

Reviewing Officer

Date:
DATE OF DEPOSIT

MAR 15 2025

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

	SCRANTON POLICE DEPARTMENT FIELD CASE REPORT	CASE# 2023-00011703
---	--	---------------------

EVENT	REPORTED DATE/TIME 4/13/2023 17:57	OCCURRED INCIDENT TYPE Other	LOCATION OF OCCURRENCE
	OCCURRED FROM DATE/TIME 04/13/2023 17:57	OCCURRED THRU DATE/TIME 04/13/2023 18:45	19 AMITY CT Scranton, PA 18509

	STATE/FEEDBACK DESCRIPTION	COUNTS	ATTENPERCOMBAT
OFFENSES			

SUBJECT	JACKET/SUBJECT TYPE Adult Subject Interviewed	NAME (LAST, FIRST, MIDDLE SUFFIX) ABAD, NIEVES, PASCUAL				
	DOB 11/29/1980	AGE or AGE RANGE 42	ADDRESS (STREET, CITY, STATE, ZIP) 747 DELAWARE ST FOREST CITY, PA 18421			
	RACE White	SEX Male	HEIGHT or RANGE 5'6" -	WEIGHT or RANGE 200	HAIR Black	EYE Brown
	DL NUMBER/STATE 34005334 / PA	PRIMARY PHONE (570)815-0829	PHONE #2	PHONE #3		

SUBJECT	JACKET/SUBJECT TYPE Adult Subject Interviewed	NAME (LAST, FIRST, MIDDLE SUFFIX) PATEL, LAKESHKUMAR,				
	DOB 10/22/1972	AGE or AGE RANGE 50	ADDRESS (STREET, CITY, STATE, ZIP) 853 CAPOUSE AVE Scranton, PA 18509			
	RACE American Indian/Alaskan Native	SEX Male	HEIGHT or RANGE 5'7" -	WEIGHT or RANGE 200	HAIR Black	EYE Brown
	DL NUMBER/STATE 27346697 / PA	PRIMARY PHONE (570)877-4675	PHONE #2	PHONE #3		

SUBJECT	JACKET/SUBJECT TYPE	NAME (LAST, FIRST, MIDDLE SUFFIX)				
	DOB	AGE or AGE RANGE	ADDRESS (STREET, CITY, STATE, ZIP)			
	RACE	SEX	HEIGHT or RANGE	WEIGHT or RANGE	HAIR	EYE
	DL NUMBER/STATE	PRIMARY PHONE	PHONE #2	PHONE #3		

REPORTING OFFICER 752 DEBIASE	DATE 4/13/2023	REVIEWED BY STANEK, Robert	DATE 04/15/2023
---	--------------------------	--------------------------------------	---------------------------



SCRANTON POLICE DEPARTMENT
FIELD CASE REPORT

CASE# **2023-00011703**

NARRATIVE

On Thursday April 13,2023 at 1757hrs I Patrolman Patrick DeBlase was dispatched to 19 Amity Court for property damage. I arrived on scene and made contact with Lakeshkumar Patel.

Lakeshkumar advised me that a male he knows bought a property next to his. Lakeshkumar stated that the male was on his property cutting down trees and a tree fell down and took out power lines and power to his apartments. I observed the wires to be damaged at 19,17,15,13 and 11 Amity Court.

PPI was on scene fixing the poles and attempting to get the power back on. The male who cut the trees down was identified as Nieves Abad. Nieves stated he just bough the property on Amity Court and he was cutting down trees trying to clean the property up. Nieves advised me that when he cut a tree, the tree fell on a powerline and knocked it out of the ground.

I advised Lakeshkumar that a report will be on file. My BWC was active.

REPORTING OFFICER 752 DEBIASE	DATE 4/13/2023	REVIEWED BY STANEK, Robert	DATE 04/15/2023
---	--------------------------	--------------------------------------	---------------------------

2 OF 2

From: Hujisa, Shani S
To: Hujisa, Shani S
Subject: FW: 2023-00661 Open Claim - and Invoice Inquiry # 58724132 & # 58718837
Date: Wednesday, June 21, 2023 1:03:18 PM

Business Use

From: Hujisa, Shani S <SSSeifert@pplweb.com>
Sent: Wednesday, June 21, 2023 1:02 PM
To: EU, MISC BILLING <EUMISCBILLING@pplweb.com>
Cc: Hujisa, Shani S <SSSeifert@pplweb.com>; Tou, April Marie <ATou@pplweb.com>; OGC, Property Damage <OGCPropertyDamage@pplweb.com>; Hanson, Kimberly R <KRHanson@pplweb.com>
Subject: RE: 2023-00661 Open Claim - and Invoice Inquiry # 58724132 & # 58718837

Hello,

I entered 12963169 / 58724132 (claim#2023-00661) in Law Manager with same info as 12951338 / 58718837 (claim#2023-00453).

As far as status of invoices.....they are not ready to bill yet.
One has issues with material, I need to reach out to them.
One has issues with material & hours, I need to reach out on that one too.

I will give you an update when I hear back from someone.

Thanks,
Shani

Business Use

From: EU, MISC BILLING <EUMISCBILLING@pplweb.com>
Sent: Wednesday, June 21, 2023 9:23 AM
To: Hujisa, Shani S <SSSeifert@pplweb.com>
Subject: FW: 2023-00661 Open Claim - and Invoice Inquiry

Hi Shani – WO 58718837 is tagged as yours. Please see below.

Business Use

From: Tou, April Marie <ATou@pplweb.com>
Sent: Tuesday, June 20, 2023 2:32 PM

DATE OF DEPOSIT

MAR 15 2025

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

To: EU, MISC BILLING <EUMISCBILLING@pplweb.com>
Cc: OGC, Property Damage <OGCPropertyDamage@pplweb.com>
Subject: FW: 2023-00661 Open Claim - and Invoice Inquiry

Can we get claim 2023-00661 opened with the same information as 2023-00453?

2023-00661 BJO 12963169 / WO 58724132

2023-00453 BJO 12951338 / WO 58718837

Also, do we have a status on the invoice for the work orders?

These claims are involved in a more complicated situation.

Best Regards,

April Tou | PPL | Steno/Clerk General
Office of General Counsel | phone: (800)748-7104 | fax: (610)774-4102
"The only limit to our realization of tomorrow will be our doubts of today." - Franklin D. Roosevelt

Business Use

From: Hanson, Kimberly R <KRHanson@pplweb.com>
Sent: Tuesday, June 20, 2023 2:27 PM
To: Tou, April Marie <ATou@pplweb.com>
Subject: RE: 837 rear capouse ave scranton pa

I'm sure you're correct.

Yes please! Thank you.

Best regards,

Kimberly R. Hanson (she/her) | Claims Specialist
Office of General Counsel | phone: (610) 774-5035 | krhanson@pplweb.com

Business Use

From: Tou, April Marie <ATou@pplweb.com>
Sent: Tuesday, June 20, 2023 1:17 PM
To: Hanson, Kimberly R <KRHanson@pplweb.com>
Subject: RE: 837 rear capouse ave scranton pa

I believe 2023-00661 is also related to this (Unknown in Law Manager, but location is 16 Amity Court, whereas 2023-00453 is 19 Amity Court)

2023-00661 BJO 12963169 / WO 58724132

2023-00453 BJO 12951338 / WO 58718837

Should I have EU open up 2023-00661 with same information as 2023-00453, and also ask them for status of invoices?

Best Regards,

April Tou | PPL | Steno/Clerk General

Office of General Counsel | phone: (800)748-7104 | fax: (610)774-4102

"The only limit to our realization of tomorrow will be our doubts of today." - Franklin D. Roosevelt

Business Use

From: Hanson, Kimberly R <KRHanson@pplweb.com>

Sent: Monday, June 19, 2023 2:56 PM

To: OGC, Property Damage <OGCPropertyDamage@pplweb.com>

Subject: RE: 837 rear capouse ave scranton pa

April,

Can you see if you can identify the 2nd BJO we have for this guy? 2nd incident occurred within a month of the first. Once you do, can you ask EU misc billing about the status of these two invoices?

Thanks!

-Kim

Best regards,

Kimberly R. Hanson (she/her) | Claims Specialist

Office of General Counsel | phone: (610) 774-5035 | krhanson@pplweb.com

Business Use

From: OGC, Property Damage <OGCPropertyDamage@pplweb.com>

Sent: Thursday, June 15, 2023 2:44 PM

To: Hanson, Kimberly R <KRHanson@pplweb.com>

Cc: Kernoschak Jr, Thomas M <tmkernoschak@pplweb.com>; Walker, Daniel Joseph <DJWalker@pplweb.com>

Subject: FW: 837 rear capouse ave scranton pa

I have attached the documents on Infor relating to PPL Claim 2023-00453 which I believe relates to the WO referenced below. There were no documents on the referenced WO, but there were comments, which I have attached as well.

Best Regards,

April Tou | PPL | Steno/Clerk General

Office of General Counsel | phone: (800)748-7104 | fax: (610)774-4102

"The only limit to our realization of tomorrow will be our doubts of today." - Franklin D. Roosevelt

Business Use

From: martjua3 <martjua3@aol.com>

Sent: Thursday, June 15, 2023 1:17 PM

To: OGC, Property Damage <OGCPropertyDamage@pplweb.com>

Subject: 837 rear capouse ave scranton pa

EXTERNAL email. STOP and THINK before responding, clicking on links, or opening attachments.

On April 3, 2023 I opened a claim number 58719831 and we asked for removal and or re route two poles on our property after speaking tom kernoschak and Danny Walker the local right away officer. I was your company does not have a easement or right away for this property for these poles , there is also nothing on the deed of the property showing any easement. I am building a building on this property and the poles and wires will interfere with building the building. I was informed by ppl it would cost me \$4000 to remove them, I am not willing to pay this and I would like to start litigation against your company to get these poles removed asap at no cost to me. I would also like to serve a 30 day notice to ppl regarding all four poles on the property to have them removed . If someone can please get back to me where I can send the paperwork from the magisterial court.

Please contact me at
Nieves abad
747 Delaware st
Forest city pa 18421

Summary of Estimated Costs

Work Order:	12951338		
Work Order Description:	BJO-57327N46297-TREE CONFIRMING		
ER #:	12951338-EAM		
Equipment:	57327N46297		
Location:	L-57327N46297		
Work Address:	AMITY COURT SCRANTON		

Capital Costs

Capital Costs - Labor:	\$	DATE OF DEPOSIT	2,221.59
Capital Costs - Material:	\$	MAR 15 2025	455.45
Capital Total:	\$	PA PUBLIC UTILITY COMMISSION SECRETARY'S BUREAU	2,677.04

Capital / O&M Split

Capital %	100.00
O&M %	0.00

Capital Costs By Activity

Activity	Activity Type	Trade	Hours	Labor Cost	Material Cost	Total Cost
40	Frontline Worker - Physical Construction	D-LINE	16.34	\$ 2,221.59	\$ 455.45	\$ 2,677.04
Capital Cost Subtotal			16.34	\$ 2,221.59	\$ 455.45	\$ 2,677.04

Capital Removal Cost by Activity

Activity	Activity Type	Trade	Hours	Labor Cost	Material Cost	Total Cost
40	Frontline Worker - Physical Construction	D-LINE	13.21	\$ 1,796.84	\$ 0.00	\$ 1,796.84
Capital Removal Cost Subtotal			13.21	\$ 1,796.84	\$ 0.00	\$ 1,796.84

Total Capital Costs	29.55	\$	4,018.43	\$	455.45	\$	4,473.88
----------------------------	-------	----	----------	----	--------	----	----------

O&M Costs By Activity

No O&M Costs

Overall Grand Total	29.55	\$	4,018.43	\$	455.45	\$	4,473.88
----------------------------	-------	----	----------	----	--------	----	----------

Additional Activities

Activity	Activity Type	Trade	Hours	Labor Cost	Material Cost	Total Cost
10	Frontline Worker - Physical Construction	RTC	8.00	\$ 1,088.00	\$ 0.00	
20	Engineering	DESIGN TECH	5.00	\$ 541.30	\$ 0.00	
	Additional Activity Subtotal		13.00	\$ 1,629.30	\$ 0.00	\$ 1,629.30

Additional Cost
No Data Available

Reimbursements:			\$ 0.00
------------------------	--	--	---------

Total Cost of Job:			\$ 6,103.18
---------------------------	--	--	-------------

Total Project Hours:			42.55
-----------------------------	--	--	-------

2390 Information		
	Direct Costs	Fully Allocated Costs
Material:	601.73	742.88
Construction Labor:	977.50	2,221.60
Total Specific Construction:	1,579.24	2,964.48
Engineering & Supervision - Labor:	200.28	541.3
Total Property Additions:	1,779.52	3,505.78
Removal Costs - Labor:	790.62	1,796.86
Operating & Maintenance Costs - Labor:	0.00	0.00
Operating & Maintenance Costs - Material:	0.00	0.00
Total Construction and Associated Costs:	\$2,570.14	\$5,302.64
Administrative and General Expense (26.2% of Direct Labor):	0.00	1,194.66
Additional Cost:		
Subtotal:	\$2,570.14	\$6,497.30
Cost to be Billed (Customer Payment):	\$2,570.14	\$6,497.30

DATE OF DEPOSIT
MAR 15 2025
PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

Part	Description	Requested	UOM	Price (UOM)	
0000102352	POLE, WOOD, 35 FEET, 2, SOUTHERN YELLOW PINE, CCA-CLIMBING ENHANCER, 7/2016	2	EA	348.31	696.62
0000105807	BOLT, EYE, 5/8 IN, 11, 12 IN, GALVANIZED STEEL, 6 IN, 1-1/2 IN X 2 IN, 12400 LB, 2344S, M&E (STANDARD PACK - 25)	2	EA	3.56	7.12
0000106244	BOLT, MACHINE, 5/8 IN, 11, 14 IN, GALVANIZED STEEL, SQUARE, B18.2.1, M&E (STANDARD PACK 25)	1	EA	1.81	1.81
0000107280	BRACKET, SUPPORT, HOOK, ALUMINUM/MALLEABLE IRON, 3/8 IN, M&E STANDARD PACK 100	1	EA	3.70	3.70
0000107630	CAP, PROTECTIVE, POLE, 15 IN DIA., MASTIC BITUMINOUS, M&E (STANDARD PACK - 10)	2	EA	14.33	28.66
0000107661	CLAMP, CABLE, STRAIN, 0.198 IN - 0.45 IN, ALUMINUM/STAINLESS STEEL, ALUMINUM/COPPER, #6 - #2/0 ACSR, 3/8 IN, 6000 LB,	2	EA	7.69	15.38
0000108402	CLAMP, CABLE, AERIAL, ALUMINUM, THREADED, M&E STANDARD PACK 50	1	EA	14.63	14.63
0000109855	DEADEND, PREFORMED/TD, SERVICE/GRIP, 13 IN, ALUMINUM, #4, 0.225 IN - 0.257 IN, M&E (STANDARD PACK 300)	1	EA	0.76	0.76
0000112502	SCREW, LAG, PILOT POINT, 3/8 IN, 4 IN, GALVANIZED STEEL, M&E (STANDARD PACK 267)	1	EA	0.45	0.45
0000115485	WASHER, FLAT, 13/16 IN, 2-1/4 IN, MALLEABLE IRON, SQUARE, 2395R, M&E (STANDARD PACK - 200)	3	EA	0.53	1.59
0000147375	CABLE, BARE, SERVICE DROP, #4 TRIPLEX, 500 FT, COIL, ALUMINUM, STRANDED, PERIWINKLE/COMP/XLP	270	FT	0.47	126.9

897.62

Procurement

107.71

1005.33

64

PPL Breakdown - Decode Values

Billing Detail Report - Decode to PPL Property Damage Invoice

Columns on the Bill Detail report which tie to Invoice

Labor
Payroll includes budget items: 11xxx, 13xxx, 33xxx, 49xxx, 69xxx; this code allows the company to group and track any payroll related costs - Payroll has 2 components (1) **Direct** - hourly rate plus items such as sick time and taxes and benefits (2) **Indirect** - two parts: **Administrative and general** - costs supporting utility operations but not chargeable to a particular operating function and **Overheads** - clearing process which allows cost distribution, such as foremen and engineering, over multiple projects which are identified in the budget items beginning with 69

Budget Item - Classifies transactions by resources consumed during a work activity

Budget Item	Description
11xxx-wages	Salaries, wages and benefits of all company employees
13xxx-employee expenses	Employee expenses
33xxx-services	Hourly basis consulting support where hourly rates are known via invoice and/or contract details
49xxx-miscellaneous	Items not properly classified under any other budget item
69xxx-clearing	Labor costs spread over multiple projects where it is impractical to direct charge individual projects

SRC
System Source - Code which identifies the type of transaction and where the transaction originated

System Source	Description
ADJ IGL	Adjustments
CTL	Contractor Time & Labor
PSA IAP	Accounts Payable
PTL	PeopleSoft Time & Labor
YEC	Year-End Clearing

Journal ID - An accounting transaction within the general ledger

Pay Code - Pay Code Description

Pay Code	Description
MEAL	Meal Allowance
OT1.5	Overtime, Call Out or Prearranged Work @ 1.5
OT2.0	Call Out or Prearranged Work @ 2.0
OTP15	Overtime Premium @ 1.5
OTP20	Overtime Premium @ 2.0
REG	Regular Scheduled Hours
SP10	Shift Premium@1.0
SP15	Shift Premium@1.5

Pay codes built into our time and labor system based on our current I.B.E.W. Local 1600 Agreement

Materials

Material & Supplies - Listing of specific material used for this job
Catalog # - Ties to the Material Catalog Number on the MR07 report
Budget Item - Description

24xxx-stores issues & returns - Cost of materials and supplies requisitioned from or returned to stores

Vehicle Usage Charges

A portion of the cost of all vehicles owned by an SRC is allocated to each project worked on by that SRC based on the direct hours charged to the project regardless of the specific vehicles used. This approach is used consistently for all projects worked by PPL Operations.

Budget Item	Description
14xxx-vehicle & equipment	Cost of using company vehicles

System Source	Description
TRP	Transportation costs which include inspection, insurance, gas, maintenance, labor and registration
ALP ALO	Vehicle depreciation costs
YEC	Year-End Clearing

Each property damage incident uses a variety of PPL owned vehicles in the classes listed below:

Class 1	Sedan, Station Wagon, Backhoe
Class 2	Pickup, Service Body, Cargo Van, Explorer, Tractor Crawler, Crane Truck Tractor Stake Body w/ Crane, Hole Digger, Small Bucket Truck, Reel Tensioner Truck, Walk-in Van, Small Stake Body, Dump, Large Stake Body, Tanker
Class 3	Digger Derrick, Manlift, Trouble Truck, Manlift, Truck Tractor, Mat Handling Bucket
Class 4	High Reach Platform

Outside Contractors

PPL supplements its workforce with contracted labor, their cost is a direct pass through
Vendor Name - Name of Contractor used on this job

Additional codes that help ensure all dollars invoiced tie back to the specific project:

Sub Project	Units of work that provide a further breakdown of projects - usually into specific tasks; resources are assigned directly to Subproject within a project
Work Order	Unique number generated from our work management system to track costs and progress of each job
Actual Hours	Hours entered against the specific work order
Actual Costs	Costs collected against the specific work order

Business Use

65

Part	Description	Requested	UOM	Price (UOM)	
0000102352	POLE, WOOD, 35 FEET, 2, SOUTHERN YELLOW PINE, CCA-CLIMBING ENHANCER, 7/2016	2	EA	348.31	696.62
0000105807	BOLT, EYE, 5/8 IN, 11, 12 IN, GALVANIZED STEEL, 6 IN, 1-1/2 IN X 2 IN, 12400 LB, 23445, M&E (STANDARD PACK - 25)	2	EA	3.56	7.12
0000106244	BOLT, MACHINE, 5/8 IN, 11, 14 IN, GALVANIZED STEEL, SQUARE, B18.2.1, M&E (STANDARD PACK 25)	1	EA	1.81	1.81
0000107280	BRACKET, SUPPORT, HOOK, ALUMINUM/MALLEABLE IRON, 3/8 IN, M&E STANDARD PACK 100	1	EA	3.70	3.70
0000107630	CAP, PROTECTIVE, POLE, 15 IN DIA., MASTIC BITUMINOUS, M&E (STANDARD PACK - 10)	2	EA	14.33	28.66
0000107661	CLAMP, CABLE, STRAIN, 0.198 IN - 0.45 IN, ALUMINUM/STAINLESS STEEL, ALUMINUM/COPPER, #6 - #2/0 ACSR, 3/8 IN, 6000 LB,	2	EA	7.69	15.38
0000108402	CLAMP, CABLE, AERIAL, ALUMINUM, THREADED, M&E STANDARD PACK 50	1	EA	14.63	14.63
0000109855	DEADEND, PREFORMED/TD, SERVICE/GRIIP, 13 IN, ALUMINUM, #4, 0.225 IN - 0.257 IN, M&E (STANDARD PACK 300)	1	EA	0.76	0.76
0000112502	SCREW, LAG, PILOT POINT, 3/8 IN, 4 IN, GALVANIZED STEEL, M&E (STANDARD PACK 267)	1	EA	0.45	0.45
0000115485	WASHER, FLAT, 13/16 IN, 2-1/4 IN, MALLEABLE IRON, SQUARE, 2395R, M&E (STANDARD PACK 200)	3	EA	0.53	1.59
0000147375	CABLE, BARE, SERVICE DROP, #4 TRIPLEX, 500 FT, COIL, ALUMINUM, STRANDED, PERIWINKLE/COMP/XLP	270	FT	0.47	126.9
					897.62
			Procurement		107.71
					1005.33



Account No. 04766

PPL-PA

EM

Attention : Barbara Shumlas

PPL ELECTRIC UTILITIES

Metro Reporting Customer Support 1-800-245-6686 or help@metroreporting.com

Metropolitan Reporting Bureau
BOX 926, William Penn Annex
Philadelphia, PA 19105-0926
FAX (800) 343-9047

Type of Report: AUTO ACCIDENT

INSURED : PPL ELECTRIC UTILITIES
CLAIM NUMBER: 58718837 / 12951338
POLICY NUM. :
DATE OF LOSS: 04/13/23
LOSS STREET : GREEN PLACE CT
LOSS CITY : SCRANTON PA
POLICE DEPT.: SCRANTON
REPORT NUM. : 23-11703
PCT./DIST. :
DESC.OF OTHER: POLE HIT

DATE OF DEPOSIT

MAR 15 2025

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

THANK YOU FOR THE ORDER! Any questions or problems please feel free to contact
PH. (800) 245-6686 or Help@metroreporting.com

NOTICE: The report/information provided to the end user (the Customer) most likely contains consumer identification information governed by the Federal Drivers Privacy Protection Act of 1994 (18 U.S.C. 2721 et seq.) (DPPA), the Gramm-Leach-Bliley Act (15 U.S.C. 6801 et seq.) (GLB), and the Fair Credit Reporting Act (15 U.S.C. 1681 et seq.) (FCRA), including all auto crash reports & all reports and information provided by state DMV'S.

Customer shall not use the information provided herein for any purpose that would violate the privacy obligation policy and any other terms and provisions of the DPPA, GLB or FCRA, or any similar federal, state or local statutes, rules, or regulations. The Customer is responsible for maintaining compliance; as such do not share report/information outside of your company. Any violation of these Laws may subject you to civil and/or criminal penalties.

Customer understands that results/data received are not proprietary, as such are being provided by a third-party source and therefore the accuracy of such results/data is not guaranteed.



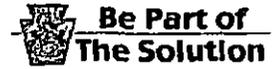
3331874745

67



Scranton Police Department

Summary



Print Date/Time: 04/20/2023 12:59
Login ID: kologee
Case Number: 2023-00011703

Scranton Police Department
ORI Number: PA0350400

Case

Case Number: 2023-00011703
Location: 19 AMITY CT
Scranton, PA 18509
Reporting Officer ID: 43624 - DEBIASE

Incident Type: Other
Occurred From: 04/13/2023 17:57
Occurred Thru: 04/13/2023 18:45
Disposition:
Disposition Date:
Reported Date: 04/13/2023 17:57 Thursday

Offenses

No.	Group/ORI	Crime Code	Statute	Description	Counts
-----	-----------	------------	---------	-------------	--------

Subjects

Type	No.	Name	Address	Phone	Race	Sex	DOB/Age
Subject Interviewed	1	ABAD, NIEVES PASCUAL	747 DELAWARE ST FOREST CITY, PA 18421	(570)815-0829	White	Male	11/29/1980 42
Subject Interviewed	2	PATEL, LAKESHKUMAR DOB	853 CAPOUSE AVE Scranton, PA 18509	(570)877-4875	Asian/Pacific Islander	Male	10/22/1972 60

Arrests

Arrest No.	Name	Address	Date/Time	Type	Age
------------	------	---------	-----------	------	-----

Property

Date	Code	Type	Make	Model	Description	Tag No.	Item No.
------	------	------	------	-------	-------------	---------	----------

Vehicles

No.	Role	Vehicle Type	Year Make	Model	Color	License Plate State
-----	------	--------------	-----------	-------	-------	---------------------

Reporting Officer

Date:

Reviewing Officer

Date:

	SCRANTON POLICE DEPARTMENT FIELD CASE REPORT	CASE# 2023-00011703
---	--	---------------------

EVENT	REPORTED ON/TIME 4/13/2023 17:57	OCCURRED INCIDENT TYPE Other	LOCATION OF OCCURRENCE 19 AMITY CT Scranton, PA 18509
	OCCURRED FROM DATE/TIME 04/13/2023 17:57	OCCURRED TIME DATE/TIME 04/13/2023 18:45	

OFFENSES	STATUTE/DESCRIPTION	CODES	ATTEMPT/COMMIT

SUBJECT	JACKET/SUBJECT TYPE Adult Subject Interviewed	NAME (LAST, FIRST, MIDDLE SUFFIX) ABAD, NIEVES, PASCUAL				
	DOB 11/29/1980	AGE or AGE RANGE 42	ADDRESS (STREET, CITY, STATE, ZIP) 747 DELAWARE ST FOREST CITY, PA 18421			
	RACE White	SEX Male	HEIGHT or RANGE 5'6" -	WEIGHT or RANGE 200	HAIR Black	EYE Brown
	DL NUMBER/STATE 34005334 / PA	PRIMARY PHONE Mobile (570)815-0829	PHONE #2	PHONE #3		

SUBJECT	JACKET/SUBJECT TYPE Adult Subject Interviewed	NAME (LAST, FIRST, MIDDLE SUFFIX) PATEL, LAKESHKUMAR,				
	DOB 10/22/1972	AGE or AGE RANGE 50	ADDRESS (STREET, CITY, STATE, ZIP) 853 CAPOUSE AVE Scranton, PA 18509			
	RACE American Indian/Alaskan Native	SEX Male	HEIGHT or RANGE 5'7" -	WEIGHT or RANGE 200	HAIR Black	EYE Brown
	DL NUMBER/STATE 27346697 / PA	PRIMARY PHONE Cellular (570)877-4675	PHONE #2	PHONE #3		

SUBJECT	JACKET/SUBJECT TYPE	NAME (LAST, FIRST, MIDDLE SUFFIX)				
	DOB	AGE or AGE RANGE	ADDRESS (STREET, CITY, STATE, ZIP)			
	RACE	SEX	HEIGHT or RANGE	WEIGHT or RANGE	HAIR	EYE
	DL NUMBER/STATE	PRIMARY PHONE	PHONE #2	PHONE #3		

REPORTING OFFICER 752 DEBIASE	DATE 4/13/2023	REVIEWED BY STANEK, Robert	DATE 04/16/2023
----------------------------------	-------------------	-------------------------------	--------------------



SCRANTON POLICE DEPARTMENT
FIELD CASE REPORT

CASE# **2023-00011703**

NARRATIVE

On Thursday April 13,2023 at 1757hrs I Patrolman Patrick DeBlase was dispatched to 19 Amity Court for property damage. I arrived on scene and made contact with Lakeshkumar Patel.

Lakeshkumar advised me that a male he knows bought a property next to his. Lakeshkumar stated that the male was on his property cutting down trees and a tree fell down and took out power lines and power to his apartments. I observed the wires to be damaged at 19,17,15,13 and 11 Amity Court.

PPI was on scene fixing the poles and attempting to get the power back on. The male who cut the trees down was identified as Nieves Abad. Nieves stated he just bough the property on Amity Court and he was cutting down trees trying to clean the property up. Nieves advised me that when he cut a tree, the tree fell on a powerline and knocked it out of the ground.

I advised Lakeshkumar that a report will be on file. My BWC was active.

REPORTING OFFICER 752 DEBIASE	DATE 4/13/2023	REVIEWED BY STANEK, Robert	DATE 04/15/2023
---	--------------------------	--------------------------------------	---------------------------

2 OP2



TWO NORTH NINTH STREET
ALLENTOWN, PA 18102-2179

INVOICE NUMBER
91130033-3

INVOICE DATE
01/01/00

TOTAL AMOUNT
1,685.21

NIEVES P. ABAD
747 DELAWARE ST.
FOREST CITY, PA 18421

FPL CONTROL ACCOUNT: 014356

MAKE CHECKS PAYABLE TO:
FPL Electric Utilities Corp

--- 3 4100016852110001685218 9113003300

AMOUNT PAID

TO ENSURE PROPER CREDIT, PLEASE RETURN THIS PORTION WITH PAYMENT IN ENCLOSED ENVELOPE
TO: FPL CORPORATION, PO BOX 25222 LEHIGH VALLEY, PA 18002-5222

NIEVES P. ABAD
747 DELAWARE ST.
FOREST CITY, PA 18421

REFER ALL INQUIRIES TO:
CSC Claims Office 600-746-7104

PLEASE REFER TO THIS NUMBER WHEN
CALLING OR WRITING: 91130033-3

ITEM	DESCRIPTION	AMOUNT
1	Property Damage Cost of repairing damage to car property located at Amity Court, Scranton, PA Incident date: May 25, 2023 MR # 20724232 Claim # 2023-00661	0.00
2	Laber	1,563.00
3	Vehicle Lease Charges	122.21
Payment Due: Net 30		

INVOICE NUMBER
91130033-3

INVOICE DATE
01/01/00

TOTAL AMOUNT
1,685.21

FPL Electric Utilities Corp
TWO NORTH NINTH STREET, ALLENTOWN, PA 18102-2179

Business Use

71

Sub Project	Work Order	Budget Item	SRC	System Source	Journal ID	Vendor Name	Voucher - PSA	Catalog #	Actual Hours ACT	Actual Hours BLD	Actual Amount ACT	Actual Amount BLD
EAM		11000	0451	PAC	PAC0014917		REG		0.5		33.69	
EAM		11000	0451	PAC	PAC0014923		REG		-0.5		-33.69	
EAM		11000	0451	PTL	AGBILL6231					0.0		15.35
EAM		11000	0451	PTL	PTL0016158		REG		0.5		33.69	
EAM		69000	0451	PAC	LDG9004940				0.0		0.00	
EAM		69000	0451	PTL	LDG9006231				0.0		0.27	
EAM		69020	0451	PAC	LDG9204940				0.0		0.00	
EAM		69020	0451	PTL	LDG9206231				0.0		13.48	
				Labor Est							1,224.00	
				A&G Est								276.21
											1,271.44	291.56
												1,563.00
EAM		14000	0451	TRP	TRP0025013				0.0		2.17	
EAM		14000	0451	TRP	TRP0025013				0.0		-2.17	
EAM		14000	0451	TRP	TRP0026184				0.0		2.60	
EAM		14D00	0451	ALP	ALP1005515				0.0		0.75	
EAM		14D00	0451	ALP	ALP1008067				0.0		0.15	
				TRP Est							82.71	
				ALP Est							38.00	
											122.21	
EAM	EAM Sub-To								0.5	0.0	50.94	15.35
Total									0.5	0.0	50.94	15.35
	50.94	12963169-098-470			Lab		1,563.00				15.35	A&G
	1342.71	804300-1-470			Veh		122.21				276.21	A&G Est
	291.56	045610-400					1,685.21				1,224.00	Lab Est
	1685.21										82.71	TRP Est
											38.00	ALP Est
											1,685.21	

Billing Detail Report - Decode to PPL Property Damage Invoice

Columns on the Bill Detail report which tie to Invoice

Payroll includes budget items: 11xxx, 13xxx, 33xxx, 49xxx, 69xxx; this code allows the company to group and track any payroll related costs - Payroll has 2 components (1) Direct - hourly rate plus items such as sick time and taxes and benefits (2) Indirect - two parts: Administrative and general - costs supporting utility operations but not chargeable to a particular operating function and Overheads - clearing process which allows cost distribution, such as foremen and engineering, over multiple projects which are identified in the budget items beginning with 69

Labor

Budget Item - Classifies transactions by resources consumed during a work activity

Budget Item Description
 11xxx-wages Salaries, wages and benefits of all company employees
 13xxx-employee expenses Employee expenses
 33xxx-services Hourly basis consulting support where hourly rates are known via Invoice and/or contract details

49xxx-miscellaneous Items not properly classified under any other budget item
 69xxx-clearing Labor costs spread over multiple projects where it is impractical to direct charge individual projects

SRC Supplying Responsibility Center is the organization which performs the work and generates the charge

System Source - Code which identifies the type of transaction and where the transaction originated

System Source
 ADJ IGL Adjustments
 CTL Contractor Time & Labor
 PSA IAP Accounts Payable
 PTL PeopleSoft Time & Labor
 YEC Year-End Clearing

Journal ID

An accounting transaction within the general ledger

Pay Code **Pay Code Description**
 MEAL Meal Allowance
 OT1.5 Overtime, Call Out or Prearranged Work @ 1.5
 OT2.0 Call Out or Prearranged Work @ 2.0
 OTP15 Overtime Premium @ 1.5 Pay codes built into our time and labor system based on our current I.B.E.W. Local 1600 Agreement
 OTP20 Overtime Premium @ 2.0
 REG Regular Scheduled Hours
 SP10 Shift Premium@1.0
 SP15 Shift Premium@1.5

Materials

Material & Supplies Listing of specific material used for this job

Catalog # Ties to the Material Catalog Number on the MR07 report

Budget Item Description
 24xxx-stores Issues & returns Cost of materials and supplies requisitioned from or returned to stores

A portion of the cost of all vehicles owned by an SRC is allocated to each project worked on by that SRC based on the direct hours charged to the project regardless of the specific vehicles used. This approach is used consistently for all projects worked by PPL Operations.

Vehicle Usage Charges

Budget Item Description
 14xxx-vehicle & equipment Cost of using company vehicles

System Source Description
 TRP Transportation costs which include Inspection, Insurance, gas, maintenance, labor and registration
 ALP ALO Vehicle depreciation costs
 YEC Year-End Clearing

Each property damage Incident uses a variety of PPL owned vehicles in the classes listed below:

Class 1 Sedan, Station Wagon, Backhoe
 Class 2 Pickup, Service Body, Cargo Van, Explorer, Tractor Crawler, Crane Truck Tractor
 Class 3 Stake Body w/ Crane, Hole Digger, Small Bucket Truck, Reel Tensioner Truck, Walk-in Van, Small Stake Body, Dump, Large Stake Body, Tanker
 Class 4 Digger Derrick, Manlift, Trouble Truck, Manlift, Truck Tractor, Mat Handling Bucket
 Class 6 High Reach Platform

Outside Contractors

PPL supplements its workforce with contracted labor, their cost is a direct pass through

Vendor Name Name of Contractor used on this job

Additional codes that help ensure all dollars invoiced tie back to the specific project:

Sub Project Units of work that provide a further breakdown of projects - usually into specific tasks; resources are assigned directly to Subproject within a project
Work Order Unique number generated from our work management system to track costs and progress of each job
Actual Hours Hours entered against the specific work order
Actual Costs Costs collected against the specific work order

Business Use



REPORT OF DAMAGE TO COMPANY PROPERTY

Day Thursday	Date 05/25/2023	Time 10:43	W.O. No. 58724132(6640557-1)	Resp. Center 0453	Law Manager No.
Incident Location 16 amity CT scranton PA 18508		City / Boro / Twp. scranton		County lackawanna	
Grid No. 57335 N 46309 S					
Operator Name		Telephone No. () -		Owner Name	
Address		Address		Telephone No. () -	
City / Boro / Twp		State Zip		City / Boro / Twp	
Operator's License No.		State		Vehicle Reg. No.	
Trailer Reg. No.		State		VIN No.	
Make of Vehicle		Model		Year	
Investigating Police Dept. scranton pd		Incid./Report No. 23-18054		Address, if Known	
Telephone No. () -					
Check If Known <input checked="" type="checkbox"/> Overhead <input type="checkbox"/> Underground - Employee Dig - In <input type="checkbox"/> Underground - Contractor Dig - In <input type="checkbox"/> Underground - PPL Subcontractor Dig - In <input type="checkbox"/> Power Plant Facilities <input type="checkbox"/> Substation <input type="checkbox"/> PPL Recreation Facility <input type="checkbox"/> Company Vehicle (Unattended) <input type="checkbox"/> Serious/Fatal Injury <input type="checkbox"/> Other - _____		Weather / Light Conditions (Check all that Apply) <input type="checkbox"/> Rain <input type="checkbox"/> Fog <input type="checkbox"/> Clear <input type="checkbox"/> Snow / Ice <input type="checkbox"/> Windy <input type="checkbox"/> Other - _____		Road Conditions (Check all that Apply) <input type="checkbox"/> Wet <input type="checkbox"/> Snow <input type="checkbox"/> Ice <input type="checkbox"/> Other - _____ <input type="checkbox"/> Rough <input type="checkbox"/> Smooth <input type="checkbox"/> Unimproved	
Describe Damage to Property and Briefly Describe Accident / Incident (Include Type and Extent of Damage) Police on Scene tree took down secondary again-- REPAIR STATUS: Permanent; INCIDENT TYPE: TRE					
Owner's Insurance Company				Policy No.	
Address		Telephone No. () -		Agent	
Telephone No. () -		Agent		Telephone No. () -	
Witness/Employee * 1.		Telephone No. () -		Witness/Employee * 2.	
Address		Address		Telephone No. () -	
Witness/Employee * 3.		Telephone No. () -		Witness/Employee * 4.	
Address		Address		Telephone No. () -	
INSTRUCTIONS Refer to OGC Claims Instructions for Completion See reverse side for sketch and additional information Please TYPE or PRINT * If witness is a PPL employee, enter only Name, Employee Number and Job Title * Resource Management will send completed form to OGC-Claims, GENTW5			<input type="checkbox"/> Permanent Repairs Required		<input checked="" type="checkbox"/> All Work Completed
			Prepared by		Employee No.
			Roberts, Tim R.		160645
					Date
					05/25/2023
					10:43

Check If Required:

<input type="checkbox"/> Inspection Only	<input type="checkbox"/> Switching	<input type="checkbox"/> Flagmen
<input type="checkbox"/> Temporary Cutouts/Sectionalizers	<input type="checkbox"/> Switching Permit #	
TRANSFORMER: <input type="checkbox"/> Repaired	<input type="checkbox"/> Scrapped	<input type="checkbox"/> Transferred

LIST OF MATERIAL

INSTALLED	REMOVED	TRANSFERRED	REQUIRED FOR PERMANENT REPAIR

OVERHEAD

Pole Distance From Edge of Paved Surface to Face of Pole _____

Pole Distance From Centerline to Face of Pole _____ Pole Replaced in Location? Yes No

Height of Wire at Time of Damage _____ After Repairs _____

Over: Driveway _____ Road _____ Private Lane _____

Other _____

Height of Vehicle/Equipment _____

UNDERGROUND (Dig-In Information)

Description and Type of Event (Explain and check all that apply) Dig-In Contractor Involved? YES NO

Subcontractor Involved? YES NO

PPL Locator's Employee Number _____

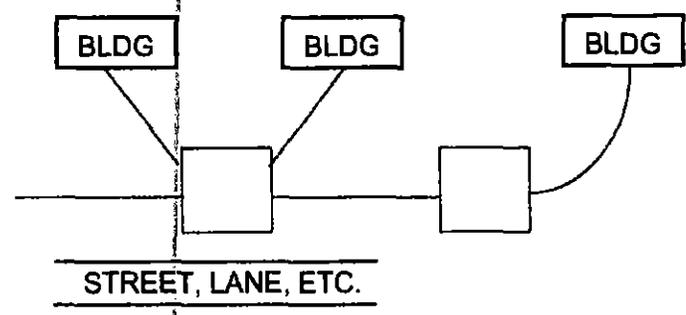
Service Interrupted? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	POCS call in effect? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO If YES, POCS Ticket No.: _____	Billable Event? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	If not billable, explain why: _____
---	--	---	-------------------------------------

Line Marked: Yes: Paint Flags

No

Distance From Dig-In To Marked Location: _____ Cable Depth: _____

REMARKS/ADDITIONAL INFORMATION:



Cable Type: Pri. Sec. S/L SVC

INDICATE ON SKETCH:
Route of Excavation:
Paint Location:
Flags/Stakes:
Location of Dig-In:



Details For Order 6640557-1 Order Type PSP

Incident 53 Wire Down-911

First Call	Reported By: LAKESH PATEL Call Time: 10:00 5/25/2023 Phone: 570-342-9111 Meter Number: 300941161_2 Meter Location: Left Side Address: 0 11 AMITY CT City: SCRANTON	
Areas	Crew Area: Scranton Crew Area Dispatch Center: Scranton Dispatcher Area	
Outage Info	Supply Device:	Development Designation
	Device: TRAN (30391) A 57335N46309	Time Off: 10:00 5/25/2023
	Device Location: 57327N46297 - 11 AMITY CT SCRANTON PA 18509	
	Latitude: 41.418790490067 Longitude: -75.65958004105	
	Substation: SUBURBAN YARD#2 69/12 KV	Phases:
	Feeder(s): 21704	ERT:
	Number of Calls: 1 Customers Affected: 0	
	Info for PPL: ::MDT No Required Permit per E71944 tree cutters took two spans of sec down, Other (explain)::	
Informative Call Comments	- TREE BROUGHT WIRES DOWN AT GRID 57327N46297	
Instructions:	CREW ASSESSED: Assessed::Crew:e71944::05/25/2023 11:26:03: 57335N46309 BJO 3781 submitted by Roberts, Tim at 10:43 on 05/25/2023 WAM Order Number: 58724132	



Q 58719831

Comments Closing Additional Costs Cost Summary

12952883 - OH POLE AND SECO...
Legacy Work Order: 58719831
ER Number: 289122-EAM
Region: Northeast



m POLE # 57334N42685 and 57339N46273 as its on his prop; erty in his driveway.;
Avbd requesting poles & wires removed from; : SEND-RATE-CONFIRM-N

I EXPLAINED TO CUSTOMER THAT POLES CAN NOT BE MOVED UNTIL
CUSTOMERS AND STREETLIGHT IS REFEED. SEE WO 12948595 TO RIGHT OF
WAY

289122-EAM

S/W Nieves Abad he wants to service PPL court papers, due to the charge for reloc
that are on his property. He claims to have spoken to his county. He says the poles
illegally and he should have to pay to have them relocated. Explained I would ema
department and provided OGC #. Sent email ROW agent Dan Walker and CC desig
Kernoschak.

Received a response from Dan Walker he advised that him and Tom were both awar
position and that Mr. Abad was also made aware of PPL's Position. When and if it be
necessary he will escalate the matter to the office of general counsel

Caller NIEVES ABA8D requested legal department tel # or mailing address to serve
to have poles removed for Right of Way, provided Office of General Counsel tel # 6

Activities

Documents

More ▾

caller Nieves

Created: 04/23/2023 17:45

INFOREAMI (INFOREAMI@PFLWEB.COM)

Created: 04/24/2023 07:53

Kernoschak Jr, Thomas V (TKERNOSCHAK@PFLWEB.COM)

Created: 04/24/2023 11:17

Database Internal User (DATABRIDGEINTERNALUSER)

location of poles

Created: 06/12/2023 15:21

are there

Malozzi, Jessica (JMALOZI@PFLWEB.COM)

in ROW

in tech Thomas

name of Mr. Abad's

Created: 06/12/2023 17:10

names

Malozzi, Jessica (JMALOZI@PFLWEB.COM)

business paperwork

Created: 06/15/2023 11:51

10-774-5057

Collins, Jillian F. (JCOLLINS@PFLWEB.COM)



Account No. 04766

Attention : Barbara Shumlas

PPL-PA

Memo-Sendout

PPL Electric Utilities

Claim : 58724132 / 12963169
Insured Name : PPL ELECTRIC UTILITIES
Type of Report : AUTO ACCIDENT

**THE POLICE DEPARTMENT REPORTS THAT THEY DO NOT HAVE A REPORT ON FILE.
THIS WAS A LOG ENTRY ONLY. NO REPORT WRITTEN.**

DATE OF DEPOSIT

MAR 15 2025

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

THANK YOU FOR THE ORDER!

Any questions or problems please feel free to contact us.

PH. (800) 245-6686 or Brenda@metroreporting.com

FX. (800) 343-9047



3331963569



PPL Electric Utilities eCut-In Card

Work Order Information

Work Order #	58719830
Initiator Name	NIEVES ABAD
Service Address	837 CAPOUSE AVE REAR SCRANTON, PA 18509
Date of Inspection	08/10/2023
Owner / Occupant	
Meter #	
Grid #	57327N46297

Inspection Information

Electrical Contractor Name	Jerry
Electrical Contractor Phone	(570) 677-6129
Phase	Single Phase
Voltage	120 / 240
Amps	200A
Overhead / Underground	
IEEE / UL1741	
Status	Approved

Comments:

Inspector Information

Agency Name	NEIC
Agency Address	209 MAIN ST CHILDS, PA 18407
Inspector's Name	JOHN MARINO
Inspector Certification Number	003302
Date of Submission	8/11/2023

Inspector agreed...

By clicking submit, I am stating that I am authorized to certify that persons have installed all electric wiring and apparatus at the subject premises, and that the said wiring and apparatus comply with the requirements of the National Electrical Code and of all Authorities Having Jurisdiction (AHJ) and is deemed safe for introduction of current.

Associated Work Orders:



Designer: TOM KERNOSCHAK

CELL: 610-477-9092

DESK: 570-348-1625

Design Area: SCRANTON

WO: 12952883

TITLE: OH POLE AND SECONDARY RELOC ABAD

Address/Grid: AMITY CT OFF GREEN PL SCRANTON

Site Contact: NIEVES ABAD 631-575-2348

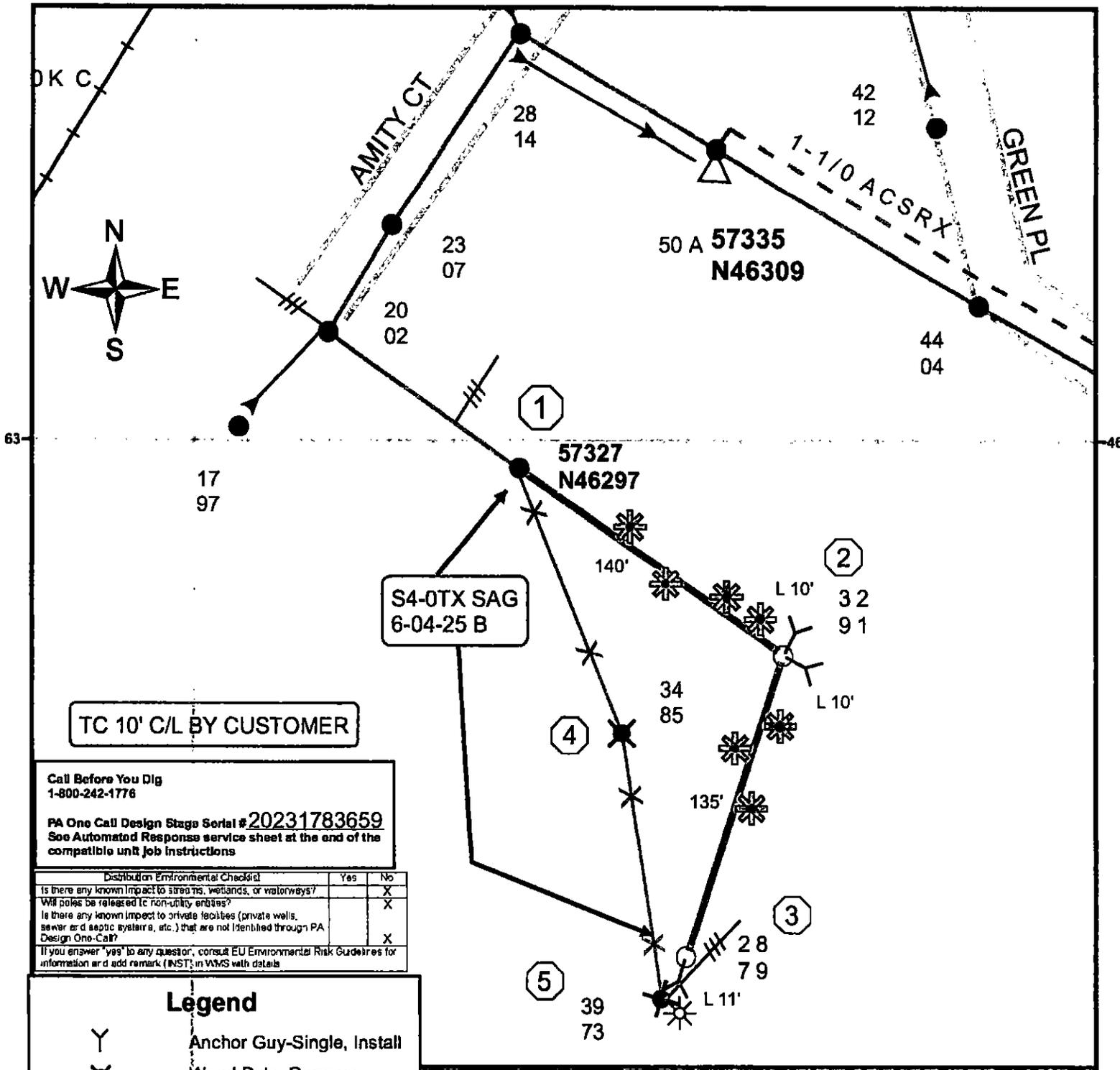
Construction Safety Alerts:	Safety Memo
<input type="checkbox"/> ENERGY CONTROL REQUIRED	
<input checked="" type="checkbox"/> REVIEW ONE CALL MARKINGS	
<input type="checkbox"/> FOREIGN UTILITIES NEARBY	
<input type="checkbox"/> SPECIAL ACCESS/LIMITED ACCESS	
<input type="checkbox"/> ABNORMAL EQUIPMENT CONFIGURATION	
<input type="checkbox"/> ABNORMAL CIRCUIT CONFIGURATON	
<input checked="" type="checkbox"/> AGGRESSIVE WILDLIFE/PETS	
<input type="checkbox"/> VERTICAL CONSTRUCTION PRESENT	
<input checked="" type="checkbox"/> OTHER NARROW COURT	

Job Scope / Construction Notes:

INSTALL 2 POLES AND 3 ANCHOR GUYS. REMOVE 2 POLES AND RELOCATE SECONDARY. SALVAGE NEW CCA POLE IF POSSIBLE.

Design Completion Checklist (select those that apply)		
<input checked="" type="checkbox"/> Right-of-Way	<input checked="" type="checkbox"/> PA-1 Call	<input checked="" type="checkbox"/> Field Review Added
<input type="checkbox"/> Highway Permit	<input type="checkbox"/> Foreign Utility Work	
<input type="checkbox"/> Customer Payment	<input checked="" type="checkbox"/> Tree Work	<input checked="" type="checkbox"/> Pole Loading Modeled

98



TC 10' C/L BY CUSTOMER

S4-0TX SAG
6-04-25 B

Call Before You Dig
1-800-242-1776
PA One Call Design Stage Serial # **20231783659**
See Automated Response service sheet at the end of the compatible unit job instructions

Distribution Environmental Checklist		Yes	No
Is there any known impact to streams, wetlands, or waterways?			X
Will poles be released to non-utility entities?			X
Is there any known impact to private facilities (private wells, sewer or septic systems, etc.) that are not identified through PA Design One-Call?			X

If you answer "yes" to any question, consult EU Environmental Risk Guidelines for information and add remark (INST) in WMS with details

Legend

- Y Anchor Guy-Single, Install
- X Wood Pole, Remove
- O Wood Pole, Install
- Wood Pole, Existing
- ▽ OH Transformer, Existing
- ☀ Streetlight, Existing
- - - Primary OH, 1, Existing
- Secondary OH, Existing
- Secondary OH, Install
- X X Secondary OH, Remove
- /// Service OH, Existing
- ▶ Span Guy, Single, Existing

WO/Design: 12952883/309256	PPL Electric Utilities Corporation Allentown, PA Scope of Work / Construction Details For: OH 1PH POLE SEC RELOC ABAD AMITY PL, REAR CAPOUSE CITY OF SCRANTON LACKAWANNA COUNTY
ER: 289122	
SCALE N.T.S.	
REGION: NORTHEAST	
DATE: 6/27/2023	
ENGR: Kemoschak, Thomas M	DWG. NO.: 12952883/309256-C-00

83

Construction Report - by Workpoint

Organization : 2041 Department : DIST Work Order : 12952883

Work Order	12952883	Region	Northeast
Work Order Desc	OH POLE AND SECONDARY RELOC ABAD	Service Center	830-1
Responsible Engineer	42990	Location	L-57339N46273
Equipment	57339N46273	Sched. Start Date	Jun 7, 2023 12:00:00 AM
Work Address	837 CAPOUSE AVE REAR SCRANTON, PA 18509	RIS Date	Aug 18, 2023 12:00:00 AM
Parent Work Order			
Parent Work Order Desc.		Child WOs	Child WO Desc.
		No Data Available	

Work Location	57327N46297						
Work Point	1						
Action Type	Quantity	Span	CU Account	Compatible Unit	CU Desc.	CU Reference	Trade
Install - Energized	1		C	NDE-D	NEUTRAL DEAD END-CLAMP D	6-13-18-E	D-LINE
Install - Energized	1		C	PREP-POLE	PREPARE POLE-AVERAGE		D-LINE
Install - Energized	1		C	QW-1PH	QUALIFIED WATCHMAN - 1PH		D-LINE
Install - Energized	1		C	TC-A	TRAFFIC CONTROL AVERAGE - 0.465 HRS/UNIT		D-LINE
Install - Energized	1		C	DTRAVEL	ADDL TRAVEL TIME =>15 MILES		D-LINE
Install - Energized	2		C	LABOR-3844	POLES AND FIXTURES		D-LINE
Remove - Energized	1		C	PREP-POLE	PREPARE POLE-AVERAGE		D-LINE
Remove - Energized	1		C	NDE-C	NEUTRAL DEAD END-CLAMP C	6-13-18-E	D-LINE
Work Location	57332N46291						
Work Point	2						
Action Type	Quantity	Span	CU Account	Compatible Unit	CU Desc.	CU Reference	Trade
Install - Not Energized	2		C	AG3-8KIT	3/8 AG KIT-35-45 POLES 3/4X8 ROD	6-02-34	D-LINE
Install - Not Energized	2		C	NDE-D	NEUTRAL DEAD END-CLAMP D	6-13-18-E	D-LINE
Install - Not Energized	1		C	35-2	WOOD POLE-35FT CLASS 2 PENTA	6-02-05	D-LINE
Install - Not Energized	150		C	S4-0TX	4/0 TRIPLEX OH SEC CABLE		D-LINE
Install - Not Energized	1		C	PREP-POLE	PREPARE POLE-AVERAGE		D-LINE
Work Location	57328N46279						
Work Point	3						
Action Type	Quantity	Span	CU Account	Compatible Unit	CU Desc.	CU Reference	Trade
Install - Not Energized	1		C	AG3-8KIT	3/8 AG KIT-35-45 POLES 3/4X8 ROD	6-02-34	D-LINE
Install - Not Energized	1		C	PREP-POLE	PREPARE POLE-AVERAGE		D-LINE
Install - Not Energized	1		C	SER-GP1-0TX	SERV CBL GRIP 1-0 TX	6-07-03S6	D-LINE
Install - Not Energized	1		C	NDE-D	NEUTRAL DEAD END-CLAMP D	6-13-18-E	D-LINE
Install - Not Energized	140		C	S4-0TX	4/0 TRIPLEX OH SEC CABLE		D-LINE
Install - Not Energized	1		C	35-2	WOOD POLE-35FT CLASS 2 PENTA	6-02-05	D-LINE
Work Location	57334N46285						
Work Point	4						
Action Type	Quantity	Span	CU Account	Compatible Unit	CU Desc.	CU Reference	Trade
Remove - Not Energized	1		C	35-2	WOOD POLE-35FT CLASS 2 PENTA	6-02-05	D-LINE
Remove - Not Energized	1		C	PLA-CU	POLE LOCATION ABANDONED		D-LINE
Remove - Not Energized	1		C	PLA-2	POLE LOCATION ABANDONED		D-LINE

Jun 27, 2023

Action Type	Quantity	Span	CU Account	Compatible Unit	CU Desc.	CU Reference	Trade
Remove - Not Energized	1		C	ACNC	AERIAL CABLE + NEUTRAL CLAMP	6-13-10-K	D-LINE
Remove - Not Energized	1		C	PREP-POLE	PREPARE POLE-AVERAGE		D-LINE
Remove - Not Energized	130		C	S4TX	4 TRIPLEX OH SEC CABLE		D-LINE
Work Location	57339N46273						
Work Point	5						
Action Type	Quantity	Span	CU Account	Compatible Unit	CU Desc.	CU Reference	Trade
Install - Not Energized	1		C	RECONN-SL	RECONNECT STREETLIGHT TO NEW SEC		D-LINE
Install - Not Energized	1		C	FU-TRANSFER	FU ATTACH TRANSFER REQ		D-LINE
Remove - Not Energized	1		C	NDE-C	NEUTRAL DEAD END-CLAMP C	6-13-18-E	D-LINE
Remove - Not Energized	1		C	PLA-CU	POLE LOCATION ABANDONED		D-LINE
Remove - Not Energized	1		C	PREP-POLE	PREPARE POLE-AVERAGE		D-LINE
Remove - Not Energized	115		C	S4TX	4 TRIPLEX OH SEC CABLE		D-LINE
Remove - Not Energized	1		C	35-5C	WOOD POLE-35FT CLASS 5 CREO YP	6-02-05	D-LINE
Remove - Not Energized	1		C	PLA-2	POLE LOCATION ABANDONED		D-LINE
Transfer - Not Energized	1		C	CX	CABLED OVERHEAD SERVICE		D-LINE

Jun 27, 2023

86

Construction Report - Work Order Structure			
Organization : 2041 Department : DIST Work Order : 12952883			
Work Order	12952883	Region	Northeast
Work Order Desc.	OH POLE AND SECONDARY RELOC ABAD	Service Center	830-1
Responsible Engineer	42990	Location	L-57339N46273
Equipment	57339N46273	Sched. Start Date	Jun 7, 2023 12:00:00 AM
Work Address	837 CAPOUSE AVE REAR SCRANTON, PA 18509	RIS Date	Aug 18, 2023 12:00:00 AM
Parent WO			
Parent WO Description		Child WO(s)	Child WO Desc.
			No Data Available

Kernoschak Jr, Thomas M

From: POCS Web Ticket Confirmation <Delivery@pa1call.net>
Sent: Tuesday, June 27, 2023 4:48 PM
To: Kernoschak Jr, Thomas M
Subject: POCS 06/27/23 16:47:51 20231783659-000 WR# 362820230627 New Excavation Final Design

EXTERNAL email. STOP and THINK before responding, clicking on links, or opening attachments.

WEBCFM 00000 POCS 06/27/23 16:47:51 20231783659-000 WR# 362820230627 NEW XCAV DSGN

=====PENNSYLVANIA UNDERGROUND UTILITY LINE PROTECTION REQUEST===== Serial Number--
[20231783659]-[000] Channel#--[1641AWEB][0391][2019-08]
Message Type--[NEW][EXCAVATION][FINAL DESIGN]

County--[LACKAWANNA] Municipality--[SCRANTON CITY]

Work Site--[AMITY PL]

Nearest Intersection--[GREEN PLACE]

Second Intersection--[]

At Intersection--[N] Between Intersections--[N]

Subdivision--[]

Location Information--

[DEAD END COURT AT THE END OF GREEN PLACE AKA REAR 837 CAPOUSE]

Caller Lat/Lon--[41.418430/-75.659609,41.417935/-75.659588]

Mapped Type--[C] Mapped Lat/Lon--

[]

Attachments--

[[https://urldefense.com/v3/__http://www.pa811.org/attachments/20231783659_!!EqogLg!qW2kGAPx9zx3VV1orq_Qaqoe5hE3yoyClcAQ49cmXlMR1MPLm4O4OkrqQ9_KX1-QXWZekwMZHOrL4H79nEyFXM\\$](https://urldefense.com/v3/__http://www.pa811.org/attachments/20231783659_!!EqogLg!qW2kGAPx9zx3VV1orq_Qaqoe5hE3yoyClcAQ49cmXlMR1MPLm4O4OkrqQ9_KX1-QXWZekwMZHOrL4H79nEyFXM$)]

Type of Work--[RELOCATE EXISTING LINE] Depth--[8 FT]

Extent of Excavation--[3 FT X 3 FT] Method of Excavation--[AUGERING]

Equip Type--[LINE TRUCK]

Street--[] Sidewalk--[] Pub Prop--[] Pvt Prop--[X] Other--[] Private Front--[] Rear--[X] Left--[X] Right--[]

Project Dates--[] thru [] Response Due Date--[12-Jul-23]

Scheduled Excavation Date--[DESIGN]

Caller--[TOM KERNOSCHAK]

Caller Phone--[570-348-1625]

Excavator--[PPL]

Address--[1801 BROOKWOOD ST]

City--[HARRISBURG] State--[PA] Zip--[17104]

FAX--[570-348-4670] Caller Type--[B]

Email--[TMKERNOSCHAK@PPLWEB.COM]

Work For--[PPL ELECTRIC UTILITIES CORPORATION] Project Contact--[TOM KERNOSCHAK] Project Contact Phone--[610-

477-9092] Best Time to Call--[0630-1600] Project Contact Email--[TMKERNOSCHAK@PPLWEB.COM] Job Number--

[12952883] CPA Project ID--[4293982]

Prepared--[27-Jun-23] at [1647] by [E42990]

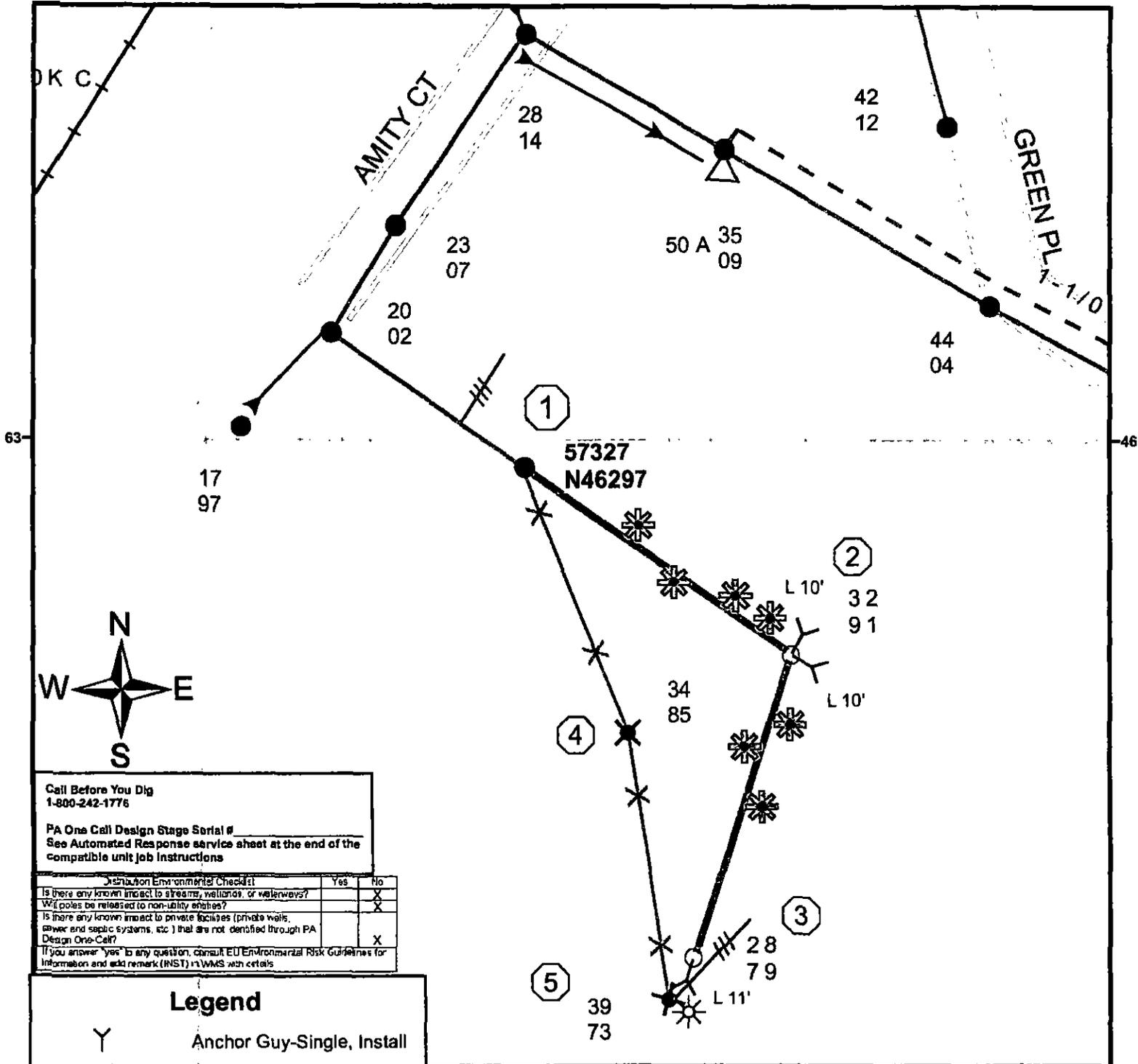
TO (ROW AGENT): Dan Walker	FROM (TECH): Tom Kemoschak
ROW REQUEST DATE: 06/27/2023	ROW NEED BY DATE: 06/30/2023

**RIGHT-OF-WAY SERVICE
REQUEST TO OBTAIN RIGHT-OF-WAY**

COUNTY: Lackawanna		MUNICIPALITY: City of Scranton	
JOB NAME/ADDRESS: OH 1PH RELOCATION ABAD AMITY PL		CONTACT PERSON(S): NIEVES ABAD	
WORK ORDER #: 12952883	ER #: DRLO - 289122	CONTACT PHONE/E-MAIL: 631-575-2348	
JOB STATUS (CHECK ALL THAT APPLY)		IS JOB STAKED?: <input type="radio"/> YES <input checked="" type="radio"/> NO	DATE OF LAST VISIT: 06/27/2023
<input type="checkbox"/> Nothing Started	<input type="checkbox"/> Under Roof	<input type="checkbox"/> Mobile on Site	
<input checked="" type="checkbox"/> Lot Cleared	<input type="checkbox"/> Customer Ready	<input type="checkbox"/> Modular Home	
<input type="checkbox"/> Construction Started	<input checked="" type="checkbox"/> Other: Needs to move poles to finish cutting trees.		

FACILITIES NEEDED/OTHER COMMENTS:

Two poles, three anchor guys, 5' t/c by customer.

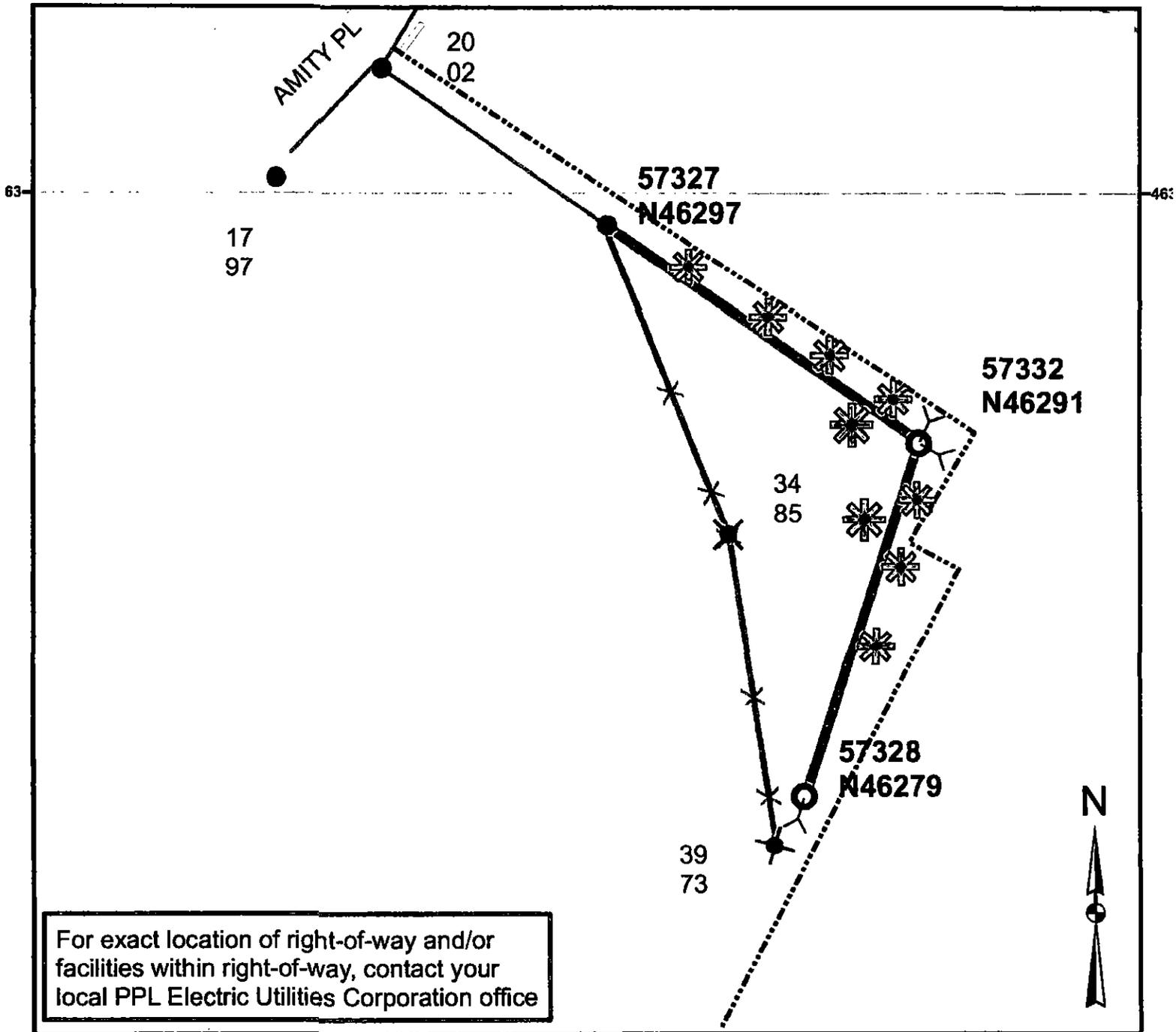


Legend

	Anchor Guy-Single, Install
	Wood Pole, Remove
	Wood Pole, Install
	Wood Pole, Existing
	OH Transformer, Existing
	Streetlight, Existing
	Primary OH, 1, Existing
	Secondary OH, Existing
	Secondary OH, Install
	Secondary OH, Remove
	Service OH, Existing
	Span Guy, Single, Existing

WO/Design: 12952883/309256	PPL Electric Utilities Corporation Allentown, PA
ER: 289122	Scope of Work / Construction Details For: OH 1PH POLE SEC RELOC ABAD AMITY PL, REAR CAPOUSE CITY OF SCRANTON LACKAWANNA COUNTY
SCALE N.T.S.	
REGION: NORTHEAST	
DATE: 6/7/2023	
ENGR: Kernoschak, Thomas M	DWG. NO.: 12952883/309256-C-00

91



For exact location of right-of-way and/or facilities within right-of-way, contact your local PPL Electric Utilities Corporation office

Legend	
	Anchor Guy, Proposed
	Pole, Remove
	Pole, Proposed
	Pole, Existing
	Overhead Wires, Existing
	Overhead Wires, Proposed
	Overhead Wires, Remove
	Treework, By Customer
	Approximate Property Line

Not for Construction

WO/Design: 12952883/309256	PLAN SHOWING FACILITIES ON PROPERTY OF:
ER: 289122	
REGION: NORTHEAST	CITY OF SCRANTON LACKAWANNA COUNTY
SCALE: N.T.S.	PPL Electric Utilities Corporation ALLENTOWN, PENNA.
DATE: 6/6/2023	SIGNATURE: DATE:
ENGR: Kernoschak, T.M.	DWG. NO.: 12952883-309256-R/W-0

92

INFOR 12951338

Form 3781 (2/2008)



REPORT OF DAMAGE TO COMPANY PROPERTY

Day Thursday	Date 04/13/2023	Time 21:36	W.O. No. 58718837(6614663-1)	Resp. Center 453	Law Manager No.
Incident Location green place CT scranton PA 15509		City / Boro / Twp. scranton		County lacka	Grid No. 57327 N 46297 S
Operator Name		Telephone No. () -		Owner Name Telephone No. () -	
Address			Address		
City / Boro / Twp		State	Zip	City / Boro / Twp	
Operator's License No.		State	Vehicle Reg. No.	State	Trailer Reg. No. State
Make of Vehicle		Model	Year	VIN No.	
Investigating Police Dept. scranton		Incid./Report No. 23-11703	Address, if Known		Telephone No. () -
Check If Known <input checked="" type="checkbox"/> Overhead <input type="checkbox"/> Underground - Employee Dig - In <input type="checkbox"/> Underground - Contractor Dig - In <input type="checkbox"/> Underground - PPL Subcontractor Dig - In <input type="checkbox"/> Power Plant Facilities <input type="checkbox"/> Substation <input type="checkbox"/> PPL Recreation Facility <input type="checkbox"/> Company Vehicle (Unattended) <input type="checkbox"/> Serious/Fatal Injury <input type="checkbox"/> Other - _____		Weather / Light Conditions (Check all that Apply) <input type="checkbox"/> Rain <input type="checkbox"/> Daylight <input type="checkbox"/> Fog <input type="checkbox"/> Dawn <input type="checkbox"/> Clear <input type="checkbox"/> Dusk <input type="checkbox"/> Snow / Ice <input type="checkbox"/> Darkness <input type="checkbox"/> Windy <input type="checkbox"/> Other - _____		Road Conditions (Check all that Apply) <input type="checkbox"/> Wet <input type="checkbox"/> Rough <input type="checkbox"/> Snow <input type="checkbox"/> Smooth <input type="checkbox"/> Ice <input type="checkbox"/> Unimproved <input type="checkbox"/> Other - _____	
Describe Damage to Property and Briefly Describe Accident / Incident (Include Type and Extent of Damage) Police on Scene tree crews cutting trees broke 2 poles and 3 spans of secondary/ 2 poles to straighten— REPAIR STATUS: Permanent; INCIDENT TYPE: TRE					
Owner's Insurance Company				Policy No.	
Address		Telephone No. () -		Agent	Telephone No. () -
Witness/Employee * 1. Address		Telephone No. () -		Witness/Employee * 2. Address	
Witness/Employee * 3. Address		Telephone No. () -		Witness/Employee * 4. Address	
INSTRUCTIONS Refer to OGC Claims Instructions for Completion See reverse side for sketch and additional information Please TYPE or PRINT * If witness is a PPL employee, enter only Name, Employee Number and Job Title * Resource Management will send completed form to OGC-Claims, GENTW5				<input type="checkbox"/> Permanent Repairs Required <input checked="" type="checkbox"/> All Work Completed	
				Prepared by Rosato, John	

93

Check if Required:

<input type="checkbox"/> Inspection Only	<input type="checkbox"/> Switching	<input type="checkbox"/> Flagmen
<input type="checkbox"/> Temporary Cutouts/Sectionalizers	<input type="checkbox"/> Switching Permit #	
TRANSFORMER: <input type="checkbox"/> Repaired	<input type="checkbox"/> Scrapped	<input type="checkbox"/> Transferred

LIST OF MATERIAL

INSTALLED	REMOVED	TRANSFERRED	REQUIRED FOR PERMANENT REPAIR

OVERHEAD

Pole Distance From Edge of Paved Surface to Face of Pole _____

Pole Distance From Centerline to Face of Pole _____ Pole Replaced in Location? Yes No

Height of Wire at Time of Damage _____ After Repairs _____

Over: Driveway _____ Road _____ Private Lane _____

Other _____

Height of Vehicle/Equipment _____

UNDERGROUND (Dig-In Information)

Description and Type of Event (Explain and check all that apply) Dig-In Contractor Involved? YES NO
 Subcontractor Involved? YES NO

PPL Locator's Employee Number _____

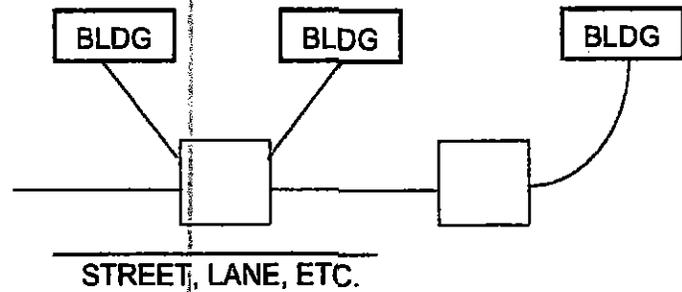
Service Interrupted? YES NO POCS call in effect? YES NO Billable Event? YES NO If not billable, explain why: _____

If YES, POCS Ticket No.: _____

Line Marked: Yes: Paint Flags No

Distance From Dig-In To Marked Location: _____ Cable Depth: _____

REMARKS/ADDITIONAL INFORMATION:



Cable Type: Pri. Sec. S/L SVC
 INDICATE ON SKETCH:
 Route of Excavation:
 Paint Location:
 Flags/Stakes:
 Location of Dig-In:
 Pad Transformer Pole
 Submersible Junction

Details For Order 6614663-1

Order Type NL

Incident Transformer (1ph)
Outage

First Call	Reported By: Call Time: Meter Number: Address: Phone: Meter Location: City:	
Areas	Crew Area: Scranton Crew Area Dispatch Center: Scranton Dispatcher Area	
Outage Info	Supply Device: CB (65) Distr Breaker 21704 Device: 57624N46255	Development Designation
	Device: TRAN (30391) A 57335N46309	Time Off: 18:47 4/13/2023
	Device Location: 57335N46309	
	Latitude: 41.418790490067 Longitude: -75.65958004105	
	Substation: SUBURBAN YARD#2 69/12 KV	Phases:
	Feeder(s): 21704	ERT: 01:00 4/14/2023
	Number of Calls: 0 Customers Affected: 0	
	Info for PPL: ::MDT No Required Permit per E71944 tree trimmers took secondary down (2 spans) 2 poles down 35/3, Other (explain)::Placed PA1 serial #20231034021 for poles 57327n46297 & 57334n46285 @ 1731. Dig time 1931. 27/97 35 clas	
Informative Call Comments		
Instructions:	BJO 3781 submitted by Rosato, John at 21:36 on 04/13/2023 WAM Order Number: 58718837 CREW ASSESSED: Assessed::Crew:e71944::04/13/2023 19:16:22: 57327N46297: 1 Pole(s): Tree Crew: Inaccessible *** RESTRICTIVE RECLOSE BLOCKING / ARC FLASH PROTECTION MAY BE REQUIRED FOR THIS JOB ***	



Account No. 04766

PPL-PA

EM

Attention : Barbara Shumlas

PPL ELECTRIC UTILITIES

Metro Reporting Customer Support 1-800-245-6686 or help@metroreporting.com

Metropolitan Reporting Bureau
BOX 926, William Penn Annex
Philadelphia, PA 19105-0926
FAX (800) 343-9047

Type of Report: AUTO ACCIDENT

INSURED : PPL ELECTRIC UTILITIES

CLAIM NUMBER: 58718837 / 12951338

POLICY NUM. :

DATE OF LOSS: 04/13/23

LOSS STREET : GREEN PLACE CT

LOSS CITY : SCRANTON PA

POLICE DEPT.: SCRANTON

REPORT NUM. : 23-11703

PCT./DIST. :

DESC.OF OTHER: POLE HIT

THANK YOU FOR THE ORDER! Any questions or problems please feel free to contact
PH. (800) 245-6686 or Help@metroreporting.com

NOTICE: The report/information provided to the end user (the Customer) most likely contains consumer identification information governed by the Federal Drivers Privacy Protection Act of 1994 (16 U.S.C. 2721 et seq.) (DPPA), the Gramm-Leach-Bliley Act (15 U.S.C. 6801 et seq.) (GLB), and the Fair Credit Reporting Act (15 U.S.C. 1681 et seq.) (FCRA), including all auto crash reports & all reports and information provided by state DMV'S.

Customer shall not use the information provided herein for any purpose that would violate the privacy obligation policy and any other terms and provisions of the DPPA, GLB or FCRA, or any similar federal, state or local statutes, rules, or regulations. The Customer is responsible for maintaining compliance, as such do not share report/information outside of your company. Any violation of these laws may subject you to civil and/or criminal penalties.

Customer understands that results/data received are not proprietary, as such are being provided by a third-party source and therefore the accuracy of such results/data is not guaranteed.

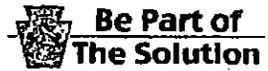


3331874745

96



Scranton Police Department Summary



Print Date/Time: 04/20/2023 12:59
Login ID: kalogee
Case Number: 2023-00011703

Scranton Police Department
ORI Number: PA0350400

Case

DATE OF DEPOSIT

Case Number: 2023-00011703
Location: 19 AMITY CT
Scranton, PA 18508
Reporting Officer ID: 43824 - DEBIASE

Incident Type: Other
Occurred From: 04/13/2023 17:57
Occurred Thru: 04/13/2023 18:45
Disposition:
Disposition Date:
Reported Date: 04/13/2023 17:57 Thursday

MAR 15 2025

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

Offenses

No.	Group/ORI	Crime Code	Statute	Description	Counts
-----	-----------	------------	---------	-------------	--------

Subjects

Type	No.	Name	Address	Phone	Race	Sex	DOB/Age
Subject Interviewed	1	ABAD, NIEVES PASCUAL	747 DELAWARE ST FOREST CITY, PA 18421	(570)815-0829	White	Male	11/29/1980 42
Subject Interviewed	2	PATEL, LAKESHKUMAR DOB	853 CAPOUSE AVE Scranton, PA 18509	(570)877-4675	Asian/Pacific Islander	Male	10/22/1972 50

Arrests

Arrest No.	Name	Address	Date/Time	Type	Age
------------	------	---------	-----------	------	-----

Property

Date	Code	Type	Make	Model	Description	Tag No.	Item No.
------	------	------	------	-------	-------------	---------	----------

Vehicles

No.	Role	Vehicle Type	Year Make	Model	Color	License Plate	State
-----	------	--------------	-----------	-------	-------	---------------	-------

Reporting Officer

Date:

Reviewing Officer

Date:

	SCRANTON POLICE DEPARTMENT FIELD CASE REPORT	CASE# 2023-00011703
---	--	----------------------------

EVENT	REPORTED DATE/TIME 4/13/2023 17:57	OCCURRED INCIDENT TYPE Other	LOCATION OF OCCURRENCE
	OCURRED FROM DATE/TIME 04/13/2023 17:57	OCURRED THRU DATE/TIME 04/13/2023 18:45	19 AMITY CT Scranton, PA 18509

OFFENSES	STATUTE/DESCRIPTION	CORRECTS	ATTEMPTED CONTACT

SUBJECT	JACKET/SUBJECT TYPE Adult Subject Interviewed	NAME (LAST, FIRST, MIDDLE SUFFIX) ABAD, NIEVES, PASCUAL				
	DOB 11/29/1980	AGE or AGE RANGE 42	ADDRESS (STREET, CITY, STATE, ZIP) 747 DELAWARE ST FOREST CITY, PA 18421			
	RACE White	SEX Male	HEIGHT or RANGE 5'6" -	WEIGHT or RANGE 200	HAIR Black	EYE Brown
	DL NUMBER/STATE 34005334 / PA	PRIMARY PHONE Mobile (570)815-0829	PHONE #2	PHONE #3		

SUBJECT	JACKET/SUBJECT TYPE Adult Subject Interviewed	NAME (LAST, FIRST, MIDDLE SUFFIX) PATEL, LAKESHKUMAR,				
	DOB 10/22/1972	AGE or AGE RANGE 50	ADDRESS (STREET, CITY, STATE, ZIP) 853 CAPOUSE AVE Scranton, PA 18509			
	RACE American Indian/Alaskan Native	SEX Male	HEIGHT or RANGE 5'7" -	WEIGHT or RANGE 200	HAIR Black	EYE Brown
	DL NUMBER/STATE 27346697 / PA	PRIMARY PHONE Cellular (570)877-4676	PHONE #2	PHONE #3		

SUBJECT	JACKET/SUBJECT TYPE	NAME (LAST, FIRST, MIDDLE SUFFIX)				
	DOB	AGE or AGE RANGE	ADDRESS (STREET, CITY, STATE, ZIP)			
	RACE	SEX	HEIGHT or RANGE	WEIGHT or RANGE	HAIR	EYE
	DL NUMBER/STATE	PRIMARY PHONE	PHONE #2	PHONE #3		

REPORTING OFFICER 752 DEBIASE	DATE 4/13/2023	REVIEWED BY STANEK, Robert	DATE 04/15/2023
---	--------------------------	--------------------------------------	---------------------------

1 OF 2



SCRANTON POLICE DEPARTMENT
FIELD CASE REPORT

CASE# 2023-00011703

NARRATIVE

On Thursday April 13, 2023 at 1757hrs I Patrolman Patrick DeBlase was dispatched to 19 Amity Court for property damage. I arrived on scene and made contact with Lakesh Kumar Patel.

Lakesh Kumar advised me that a male he knows bought a property next to his. Lakesh Kumar stated that the male was on his property cutting down trees and a tree fell down and took out power lines and power to his apartments. I observed the wires to be damaged at 19,17,15,13 and 11 Amity Court.

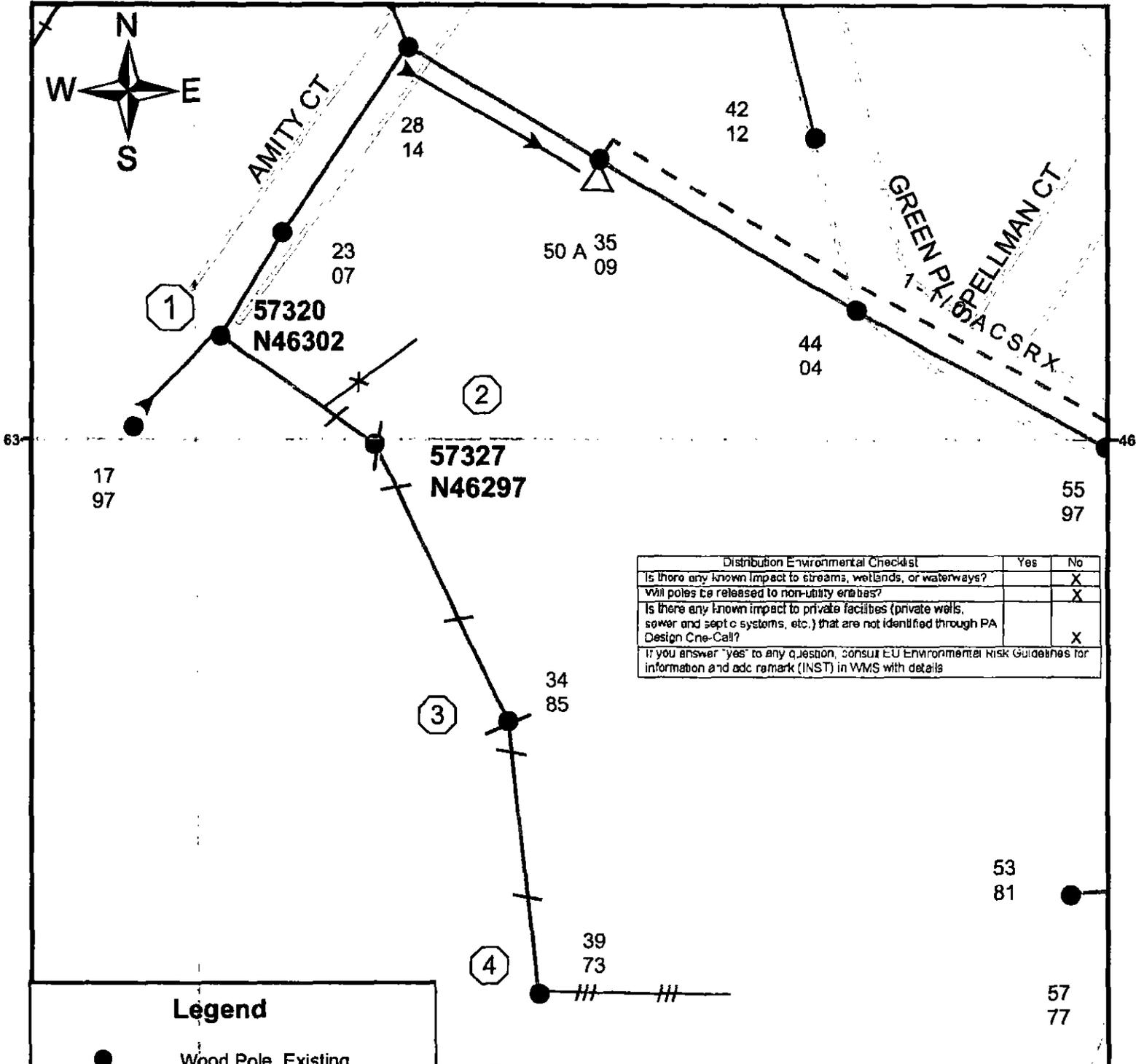
PPI was on scene fixing the poles and attempting to get the power back on. The male who cut the trees down was identified as Nieves Abad. Nieves stated he just bought the property on Amity Court and he was cutting down trees trying to clean the property up. Nieves advised me that when he cut a tree, the tree fell on a powerline and knocked it out of the ground.

I advised Lakesh Kumar that a report will be on file. My BWC was active.

REPORTING OFFICER 752 DEBIASE	DATE 4/13/2023	REVIEWED BY STANEK, Robert	DATE 04/15/2023
---	--------------------------	--------------------------------------	---------------------------

2 OF 2

99



Distribution Environmental Checklist		Yes	No
Is there any known impact to streams, wetlands, or waterways?			X
Will poles be released to non-utility entities?			X
Is there any known impact to private facilities (private wells, sewer and sept c systems, etc.) that are not identified through PA Design One-Call?			X
If you answer "yes" to any question, consult EU Environmental Risk Guidelines for information and add remark (INST) in WMS with details			

Legend	
	Wood Pole, Existing
	Wood Pole, Replace
	OH Transformer, Existing
	Streetlight, Existing
	Primary OH, 1, Existing
	Secondary OH, Replace
	Secondary OH, Existing
	Service OH, Existing
	Service OH, Removal
	Span Guy, Single, Existing

WO/Design: 12951338/307480	PPL Electric Utilities Corporation Allentown, PA
ER: 12951338	Scope of Work / Construction Details For:
SCALE N.T.S.	BJO 57327N46297 2 POLES, 3 SPANS SECONDARY, CONFIRMING
REGION: NORTHEAST	AMITY COURT OFF GREEN PLACE CITY OF SCRANTON
DATE: 4/17/2023	LACKAWANNA COUNTY
ENGR: Kernoschak, Thomas M	DWG. NO.: 12951338/307480-C-00

Summary of Estimated Costs

Work Order:	12951338		
Work Order Description:	BJO-57327N46297-TREE CONFIRMING		
ER #:	12951338-EAM		
Equipment:	57327N46297		
Location:	L-57327N46297		
Work Address:	AMITY COURT SCRANTON		

Capital Costs

Capital Costs - Labor:	\$	2,221.59
Capital Costs - Material:	\$	455.45
Capital Total:	\$	2,677.04

Capital / O&M Split

Capital %	100.00
O&M %	0.00

Capital Costs By Activity

Activity	Activity Type	Trade	Hours	Labor Cost	Material Cost	Total Cost
40	Frontline Worker - Physical Construction	D-LINE	16.34	\$ 2,221.59	\$ 455.45	\$2,677.04
Capital Cost Subtotal			16.34	\$ 2,221.59	\$ 455.45	\$2,677.04

Capital Removal Cost by Activity

Activity	Activity Type	Trade	Hours	Labor Cost	Material Cost	Total Cost
40	Frontline Worker - Physical Construction	D-LINE	13.21	\$ 1,796.84	\$ 0.00	\$1,796.84
Capital Removal Cost Subtotal			13.21	\$ 1,796.84	\$ 0.00	\$1,796.84

Total Capital Costs	29.55	\$	4,018.43	\$	455.45	\$	4,473.88
----------------------------	-------	----	----------	----	--------	----	----------

O&M Costs By Activity

No O&M Costs

Overall Grand Total	29.55		4,018.43		455.45		4,473.88
----------------------------	-------	--	----------	--	--------	--	----------

Additional Activities

Activity	Activity Type	Trade	Hours	Labor Cost	Material Cost	Total Cost
10	Frontline Worker - Physical Construction	RTC	8.00	\$ 1,088.00	\$ 0.00	
20	Engineering	DESIGN TECH	5.00	\$ 541.30	\$ 0.00	
Additional Activity Subtotal			13.00	\$ 1,629.30	\$ 0.00	\$ 1,629.30

Additional Cost
No Data Available

Reimbursements:			\$ 0.00
------------------------	--	--	---------

Total Cost of Job:			\$ 6,103.18
---------------------------	--	--	-------------

Total Project Hours:			42.55
-----------------------------	--	--	-------

2390 Information		
	Direct Costs	Fully Allocated Costs
Material:	601.73	742.88
Construction Labor:	977.50	2,221.60
Total Specific Construction:	1,579.24	2,964.48
Engineering & Supervision - Labor:	200.28	541.3
Total Property Additions:	1,779.52	3,505.78
Removal Costs - Labor:	790.62	1,796.86
Operating & Maintenance Costs - Labor:	0.00	0.00
Operating & Maintenance Costs - Material:	0.00	0.00
Total Construction and Associated Costs:	\$2,570.14	\$5,302.64
Administrative and General Expense (26.2% of Direct Labor):	0.00	1,194.66
Additional Cost:		
Subtotal:	\$2,570.14	\$6,497.30
Cost to be Billed (Customer Payment):	\$2,570.14	\$6,497.30

Work Location		57320N46302						
Work Point		1						
Action Type	Quantity	Span	CU Account	Compatible Unit	CU Desc.	CU Reference	Trade	
Install - Energized	1		C	PREP-POLE	PREPARE POLE-AVERAGE		D-LINE	
Install - Energized	1		C	SEC-CONN	SECONDARY/TRANSF CONNECTIONS		D-LINE	
Install - Energized	1		C	QW-1PH	QUALIFIED WATCHMAN - 1PH		D-LINE	
Install - Energized	1		C	TC-A	TRAFFIC CONTROL AVERAGE - 0.465 HRS/UNIT		D-LINE	
Install - Energized	1		C	DTRAVEL	ADDL TRAVEL TIME =>15 MILES		D-LINE	
Remove - Energized	1		C	TC-A	TRAFFIC CONTROL AVERAGE - 0.465 HRS/UNIT		D-LINE	
Remove - Energized	1		C	QW-1PH	QUALIFIED WATCHMAN - 1PH		D-LINE	
Remove - Energized	1		C	SEC-CONN	SECONDARY/TRANSF CONNECTIONS		D-LINE	
Remove - Energized	1		C	PREP-POLE	PREPARE POLE-AVERAGE		D-LINE	
Remove - Energized	1		C	DTRAVEL	ADDL TRAVEL TIME =>15 MILES		D-LINE	
Work Location		57327N46297						
Work Point		2						
Action Type	Quantity	Span	CU Account	Compatible Unit	CU Desc.	CU Reference	Trade	
Install - Not Energized	1		C	35-2	WOOD POLE-35FT CLASS 2 PENTA	6-02-05	D-LINE	
Install - Not Energized	1		C	SEC-CONN	SECONDARY/TRANSF CONNECTIONS		D-LINE	
Install - Not Energized	2		C	NDE-C	NEUTRAL DEAD END-CLAMP C	6-13-18-E	D-LINE	
Install - Not Energized	1		C	RESAG-CONDR	RESAG OH CONDUCTOR		D-LINE	
Install - Not Energized	1		C	RAKE-PL-N-C	KEY+RAKE NEW PL-COMPACT GROUND	6-02-13 S2	D-LINE	
Install - Not Energized	1		C	PREP-POLE	PREPARE POLE-AVERAGE		D-LINE	
Remove - Not Energized	2		C	NDE	NEUTRAL DEAD END		D-LINE	
Remove - Not Energized	1		C	SERV-CONN	SERVICE CONNECTIONS		D-LINE	
Remove - Not Energized	1		C	PREP-POLE	PREPARE POLE-AVERAGE		D-LINE	
Remove - Not Energized	1		C	35-4C	WOOD POLE-35FT CLASS 4 CREO YP	6-02-05	D-LINE	
Work Location		57334N46285						
Work Point		3						

Action Type	Quantity	Span	CU Account	Compatible Unit	CU Desc.	CU Reference	Trade
Install - Not Energized	1		C	PREP-POLE	PREPARE POLE-AVERAGE		D-LINE
Install - Not Energized	130		C	S4TX	4 TRIPLEX OH SEC CABLE		D-LINE
Install - Not Energized	1		C	35-2	WOOD POLE-35FT CLASS 2 PENTA	6-02-05	D-LINE
Install - Not Energized	1		C	ACNC	AERIAL CABLE + NEUTRAL CLAMP	6-13-10-K	D-LINE
Remove - Not Energized	125		C	S4TX	4 TRIPLEX OH SEC CABLE		D-LINE
Remove - Not Energized	1		C	35-5C	WOOD POLE-35FT CLASS 5 CREO YP	6-02-05	D-LINE
Remove - Not Energized	1		C	PREP-POLE	PREPARE POLE-AVERAGE		D-LINE
Remove - Not Energized	1		C	ACNC	AERIAL CABLE + NEUTRAL CLAMP	6-13-10-K	D-LINE
Work Location	57339N46273						
Work Point	4						
Action Type	Quantity	Span	CU Account	Compatible Unit	CU Desc.	CU Reference	Trade
Install - Not Energized	1		C	PREP-POLE	PREPARE POLE-AVERAGE		D-LINE
Install - Not Energized	1		C	RECONN-SL	RECONNECT STREETLIGHT TO NEW SEC		D-LINE
Install - Not Energized	140		C	S4TX	4 TRIPLEX OH SEC CABLE		D-LINE
Install - Not Energized	1		C	SLCG	STR LGT CBL GRIP-4DX-4TX MV-HPS	6-10-48S4	D-LINE
Install - Not Energized	1		C	SERV-CONN	SERVICE CONNECTIONS		D-LINE
Remove - Not Energized	1		C	PREP-POLE	PREPARE POLE-AVERAGE		D-LINE
Remove - Not Energized	1		C	SERV-CONN	SERVICE CONNECTIONS		D-LINE
Remove - Not Energized	1		C	SLCG	STR LGT CBL GRIP-4DX-4TX MV-HPS	6-10-48S4	D-LINE
Remove - Not Energized	135		C	S4TX	4 TRIPLEX OH SEC CABLE		D-LINE

Construction Report - Work Order Structure			
Work Order	12951338	Region	Northeast
Work Order Desc.	BJO-57327N46297-TREE CONFIRMING	Service Center	830-1
Responsible Engineer	42990	Location	L-57327N46297
Equipment	57327N46297	Sched. Start Date	Apr 15, 2023 12:00:00 AM
Work Address	AMITY COURT SCRANTON	RIS Date	Jun 14, 2023 12:00:00 AM
Parent WO			
Parent WO Description		Child WO(s)	Child WO Desc.
			No Data Available

DATE OF DEPOSIT

MAR 15 2025

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

Work Location		57320N46302						
Work Point		1						
Action Type	Quantity	Span	CU Account	Compatible Unit	CU Desc.	CU Reference	Trade	
Install - Energized	1		C	PREP-POLE	PREPARE POLE-AVERAGE		D-LINE	
Install - Energized	1		C	SEC-CONN	SECONDARY/TRANSF CONNECTIONS		D-LINE	
Install - Energized	1		C	QW-1PH	QUALIFIED WATCHMAN - 1PH		D-LINE	
Install - Energized	1		C	TC-A	TRAFFIC CONTROL AVERAGE - 0.465 HRS/UNIT		D-LINE	
Install - Energized	1		C	DTRAVEL	ADDL TRAVEL TIME =>15 MILES		D-LINE	
Remove - Energized	1		C	TC-A	TRAFFIC CONTROL AVERAGE - 0.465 HRS/UNIT		D-LINE	
Remove - Energized	1		C	QW-1PH	QUALIFIED WATCHMAN - 1PH		D-LINE	
Remove - Energized	1		C	SEC-CONN	SECONDARY/TRANSF CONNECTIONS		D-LINE	
Remove - Energized	1		C	PREP-POLE	PREPARE POLE-AVERAGE		D-LINE	
Remove - Energized	1		C	DTRAVEL	ADDL TRAVEL TIME =>15 MILES		D-LINE	
Work Location		57327N46297						
Work Point		2						
Action Type	Quantity	Span	CU Account	Compatible Unit	CU Desc.	CU Reference	Trade	
Install - Not Energized	1		C	35-2	WOOD POLE-35FT CLASS 2 PENTA	6-02-05	D-LINE	
Install - Not Energized	1		C	SEC-CONN	SECONDARY/TRANSF CONNECTIONS		D-LINE	
Install - Not Energized	2		C	NDE-C	NEUTRAL DEAD END-CLAMP C	6-13-18-E	D-LINE	
Install - Not Energized	1		C	RESAG-CONDR	RESAG OH CONDUCTOR		D-LINE	
Install - Not Energized	1		C	RAKE-PL-N-C	KEY+RAKE NEW PL-COMPACT GROUND	6-02-13 S2	D-LINE	
Install - Not Energized	1		C	PREP-POLE	PREPARE POLE-AVERAGE		D-LINE	
Remove - Not Energized	2		C	NDE	NEUTRAL DEAD END		D-LINE	
Remove - Not Energized	1		C	SERV-CONN	SERVICE CONNECTIONS		D-LINE	
Remove - Not Energized	1		C	PREP-POLE	PREPARE POLE-AVERAGE		D-LINE	
Remove - Not Energized	1		C	35-4C	WOOD POLE-35FT CLASS 4 CREO YP	6-02-05	D-LINE	
Work Location		57334N46285						
Work Point		3						

Action Type	Quantity	Span	CU Account	Compatible Unit	CU Desc.	CU Reference	Trade
Install - Not Energized	1		C	PREP-POLE	PREPARE POLE-AVERAGE		D-LINE
Install - Not Energized	130		C	S4TX	4 TRIPLEX OH SEC CABLE		D-LINE
Install - Not Energized	1		C	35-2	WOOD POLE-35FT CLASS 2 PENTA	6-02-05	D-LINE
Install - Not Energized	1		C	ACNC	AERIAL CABLE + NEUTRAL CLAMP	6-13-10-K	D-LINE
Remove - Not Energized	125		C	S4TX	4 TRIPLEX OH SEC CABLE		D-LINE
Remove - Not Energized	1		C	35-5C	WOOD POLE-35FT CLASS 5 CRED YP	6-02-05	D-LINE
Remove - Not Energized	1		C	PREP-POLE	PREPARE POLE-AVERAGE		D-LINE
Remove - Not Energized	1		C	ACNC	AERIAL CABLE + NEUTRAL CLAMP	6-13-10-K	D-LINE
Work Location		57339N46273					
Work Point		4					
Action Type	Quantity	Span	CU Account	Compatible Unit	CU Desc.	CU Reference	Trade
Install - Not Energized	1		C	PREP-POLE	PREPARE POLE-AVERAGE		D-LINE
Install - Not Energized	1		C	RECONN-SL	RECONNECT STREETLIGHT TO NEW SEC		D-LINE
Install - Not Energized	140		C	S4TX	4 TRIPLEX OH SEC CABLE		D-LINE
Install - Not Energized	1		C	SLCG	STR LGT CBL GRIP-4DX-4TX MV-HPS	6-10-48S4	D-LINE
Install - Not Energized	1		C	SERV-CONN	SERVICE CONNECTIONS		D-LINE
Remove - Not Energized	1		C	PREP-POLE	PREPARE POLE-AVERAGE		D-LINE
Remove - Not Energized	1		C	SERV-CONN	SERVICE CONNECTIONS		D-LINE
Remove - Not Energized	1		C	SLCG	STR LGT CBL GRIP-4DX-4TX MV-HPS	6-10-48S4	D-LINE
Remove - Not Energized	135		C	S4TX	4 TRIPLEX OH SEC CABLE		D-LINE

Construction Report - Work Order Structure

Work Order	12951338	Region	Northeast	
Work Order Desc.	BJO-57327N46297-TREE CONFIRMING	Service Center	830-1	
Responsible Engineer	42990	Location	L-57327N46297	
Equipment	57327N46297	Sched. Start Date	Apr 15, 2023 12:00:00 AM	
Work Address	AMITY COURT SCRANTON	RIS Date	Jun 14, 2023 12:00:00 AM	
Parent WO				
Parent WO Description			Child WO(s)	Child WO Desc.
			No Data Available	

Prepared by: PPL Electric Utilities
Return to: PPL Electric Utilities
ROW Department
Daniel J. Walker
600 Larch Street
Scranton, PA 18509

Form 4338F (8/2014)

W.O. Number							
1	2	9	5	2	8	8	3



GRANT OF RIGHT-OF-WAY
Individual

The UNDERSIGNED, intending to be legally bound, hereby grant unto **PPL ELECTRIC UTILITIES CORPORATION ("PPL")**, its successors and assigns, the right to construct, reconstruct, operate and maintain its electric and communication facilities consisting of two (2) poles, three (3) anchor guys and overhead facilities including such other wires, cables, fixtures and apparatus necessary for the convenient transaction of the business of PPL, upon, across, over, under and along the property identified as County Tax Parcel No. 14516 030 048 which the undersigned owns or has any interest located along Amity Place in the City of Scranton, County of Lackawanna, Commonwealth of Pennsylvania; including the right of ingress and egress to and from the said lines for any of the aforesaid purposes; also the right to cut **any and all trees** within fifteen (15) feet each side of centerline of the electric/communication line and the right to trim **any and all trees** within fifteen (15) feet each side of centerline of the electric/communication line and to remove brush along said lines which in the judgment of said PPL menace the said lines; and also the right to permit the attachment of wires and cables of any other person or company to said poles. Any poles or facilities erected hereunder along a highway, whether within or outside the highway limits, may be relocated to conform to new or relocated highway limits. PPL shall restore the property to substantially the same condition that the property was in prior to installation, maintenance or repair of the electric facilities.

Nieves Abad

3192

KNOW ALL MEN BY THESE PRESENTS, THAT REAL ESTATE TECHNOLOGY
CORP., a corporation of PENNA, having its
principal office at SCRANTON, in consideration of the
sum of ONE Dollar (\$1.00) to it paid at the date
hereof by PENNSYLVANIA POWER & LIGHT COMPANY, hereinafter called "Electric Company", the
receipt whereof is hereby acknowledged, does hereby grant unto the said Electric Company,
its successors, assigns and lessees, the right, privilege and authority to construct,
reconstruct, maintain and operate its electric lines consisting of ONE (1)
POLE AND OVERHEAD

wires, cables, fixtures and apparatus upon, across, over, under and along the property
which it owns or in which it has an interest, situate in the CITY
of SCRANTON, County of LACKAWANNA, Commonwealth
of Pennsylvania; and along the public highways adjoining the said property, including
the right of ingress and egress to and from the said line for any of the aforesaid
purposes; also the right to cut down NO trees and the right to trim
ANY NECESSARY trees and to remove brush along the said lines which
in judgment of the said Company menace the said lines; and also the right to permit the
attachments of wires and cables of any other person or company to said poles. Any poles
or facilities erected hereunder along a highway, whether within or outside the highway
limits, may, without the payment of further consideration, be relocated to conform to
new or relocated highway limits.

IN WITNESS WHEREOF the said REAL ESTATE TECHNOLOGY CORP
has caused these presents to be executed by its President and its seal to be hereunto
affixed, duly attested by its Secretary, this 28th day of JUNE,
1979.

SEAL
J.B.

ATTEST:

M. E. Bako
ASST. SECRETARY

REAL ESTATE TECHNOLOGY CORP
BY: ANTHONY CREBAS
[Signature]
PRESIDENT



211

For 57317/1146297

Pole Relocation
Amity Court
Scranton Lacka Co
ER 288789

Jacobson

SCHOOL

573

5% VOLTAGE
BUCK TO W.I.C.R.

573-463 N1
11L2

JAUITY FEEDER

SANDERSON

GREEN PL.

SPELLMAN CT

AMITY

JAUITY FEEDER

N463

LANDS OF
ANTHONY GRIGAS

LEGEND

- PROPOSED POLE
- ⊗ EXISTING POLE TO BE REMOVED
- PROPOSED POLE-TO-POLE GUY
- ⊗→ EXISTING POLE-TO-POLE GUY TO BE REMOVED

R/W Released by
IVOR E. THOMAS
Date 6-28-79

CF95107948

001

DIST

fill



Work Order: 12952883 OH POLE AND SECONDARY RELOCASAD



58715831

Record View Requisitions Comments Parts Cost Summary Addresses Activities Documents Children Checklists Book Labor Materials Status LICS Billing More

12952883 - OH POLE AND SECO...

Legacy Work Order: 58715831

ER Number: 289122-EAM

Project: B80001



m POLE # 67334N42685 and 57338N426273 as its on his prop. erty in his driveway.; caller Nieves Abad requesting poles & wires removed fro; : SEND RATE-CONFIRM-N

Created: 04/23/2023 17:45
INFORE@PPLWEB.COM

I EXPLAINED TO CUSTOMER THAT POLES CAN NOT BE MOVED UNTIL CUSTOMERS AND STREETLIGHT IS REFD. SEE WO 12948595 TO RIGHT OF WAY

Created: 04/24/2023 07:53
Kemoschak Jr, Thomas U (TKEMUSO@PPLWEB.COM)

289122-EAM

Created: 04/24/2023 11:17
Database Admin User (DATABASEINTERNALUSER)

SAW Nieves Abad he wants to service PPL court papers, due to the charge for relocation of poles that are on his property. He claims to have spoken to his county. He says the poles are there illegally and he should have to pay to have them relocated. Explained I would email ROW department and provided OGC #. Sent email ROW agent Dan Walker and CC design tech Thomas Kemoschak.

Created: 06/12/2023 15:21
David, Joseph (JDAV@PPLWEB.COM)

Received a response from Dan Walker he advised that him and Tom were both aware of Mr Abad's position and that Mr. Abad was also made aware of PPL's Position. When and if it be comes necessary he will escalate the matter to the office of general counsel

Created: 06/12/2023 17:10
Michael, James (JMIC@PPLWEB.COM)

Caller NIEVESABAD requested legal department tel # or mailing address to serve us paperwork to have poles removed for Right of Way, provided Office of General Counsel tel # 610-774-5057

Created: 06/15/2023 11:51
Cofm, Brian F. (BCO@PPLWEB.COM)

RELOCATION COST WAIVED BY OGC

Created: 06/27/2023 17:29
Kemoschak Jr, Thomas U (TKEMUSO@PPLWEB.COM)

SW Nieves Abad calling to status he knows there was some type of legal thing that that do be worked on. He will reach out to Tom and see if there's a update

Created: 08/25/2023 09:47
Dennis, Joe (JDEN@PPLWEB.COM)

Customer still has not paid for damages

Created: 11/19/2023 08:50
Kemoschak Jr, Thomas U (TKEMUSO@PPLWEB.COM)

SAW Nieves Abad who wanted to know about the costs regarding the relocation of the poles and the name and number of the engineer. Provided information

Created: 01/04/2024 15:49
Cofm, Brian F. (BCO@PPLWEB.COM)

115

Work Order: 12947575 ABAD 40 TX 400A METER LW 12952883



Q- 58716668

- Record View
- Requisitions
- Comments**
- Parts
- Cost Summary
- Addresses
- Activities
- Documents
- Children
- Checklist
- Book Labor
- Materials Status
- LICS Billing
- More

12947575 - ABAD 40 TX 400A ME...

Legacy Work Order: 58716668

EN Number: 249220-EAM

Project

ed from property pole #57334N42685. do not have an acc. caller Nieves Abad has vacant lot. wants PPL pole remov; o pole is 837 Rear Capouse Ave Scranton PA 18509; cunt. wants pole 57334N42685 removed. closest address t; : SEND-RATE-CONFIRM-N

Created: 03/29/2023 21:47
INFOREAM1 (INFOREAM1@PPLWEB.COM)

248280-002

Created: 03/30/2023 02:38
Database Internal User (DATABASEINTERNALUSER)

249220-EAM

Created: 04/03/2023 11:51
Database Internal User (DATABASEINTERNALUSER)

STILL WAITING ON PAYMENT FOR PROPERTY DAMAGE

Created: 05/11/2024 07:37
Kernschla Jr, Thomas M (TKERNOSCHLA@PPLWEB.COM)

119

Documents (0)

DATE OF DEPOSIT

MAR 15 2025

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

Work Order: 12947578 ABAD 4/0 TX METER 2-GANG LW 12952883



Q= 58716671

- Record View
- Requisitions
- Comments**
- Parts
- Cost Summary
- Addresses
- Activities
- Documents
- Children
- Checklist
- Book Labor
- Materials Status
- ICS Billing
- More

12947578 - ABAD 4/0 TX METER ...
 Legacy Work Order: 58716671
 ER Number: 249220-EAM
 Project: 881073



meter and service CH, 400 amp, provided lead time, 6-8 week; CUSTOMER DESIRED IN-SERVICE DATE 04/19/2023; s. close to address 637 CAPOUSE AVE, Scranton, PA 18503, vac; CALLER NAME : NIEVES ABAD; sv
 NIEVES ABAD, Caller Nieves Abad requesting new commercial; NEW AMP SIZE: 400A; CUSTOMER TYPE: RENTER (BUSINESS); ant lot, would like engineer to come out at location.; BUILDING TYPE: SHOP/STORE.;
 NATURE-OF-JOB-NEW PERMANENT; METHOD-OVERHEAD; AIR-COND-CENTRAL; APPLIANCES-NONE; AIR-COND-BTU-15000; SQUARE-FOOT-BUILD-8000; CONSTR-PROG-VACANT LOT; DIST-NEAREST-POLE-
 LESS THAN 100 FEET; SEND-RATE-CONFIRM-N; PREFR-METER-LOCAT: D - RIGHT REAR

Created: 03/29/2023 21:47
Marty, Megan H. (MARTYH@PPUBLIC.COM)

249220-EAM

Created: 03/30/2023 00:24
Doris Hope (DORISH@PPUBLIC.COM)

Spoke with Nieves Abad. Property is vacant lot s/w. Caller is working on clearing trees and states that there are a few trees that are entangled around utility pole to pole, Requesting assistance in removing those trees/trimming so he can remove them. Please contact customer to discuss. Sent email to Northeast Forestry.

Created: 04/24/2023 11:33
Marty, Megan H. (MARTYH@PPUBLIC.COM)

Caller does not have a bill acct for this property yet, but does have multiple work orders:
 wo's: 50719831, 50719830, 50716671, 50716668.

STILL WAITING ON PAYMENT FOR PROPERTY DAMAGE

Created: 05/11/2024 07:38
Katherine J. Thomas E. (TKATHER@PPUBLIC.COM)

117

Documents (0)

Work Order: 12953771 NIEVES ABAD



58720380

- Record View
- Requisitions
- Comments**
- Parts
- Cost Summary
- Addresses
- Activities
- Documents
- Children
- Checklist
- Book Labor
- Materials Status
- IACS Billing
- More

12953771 - NIEVES ABAD

Legacy Work Order: 58720380
 ER Number: 824904-CCN
 Project:



Callor removing trees, needs temp disconnect. advised s; someone would reach out within 10 days to review.; SEND-RATE-CONFIRM-N; DESIGNER-NOTIFICATION-Y; DESIGNER-CONTACT-Y; TEMP-DISCONNECT-20230503

824904-CCN

Created: 04/26/2023 21:43
 INFOREAL1 (INFOREAL1@PELWES.COM)

Created: 04/27/2023 03:25
 Database Intern User (DATABASESINTERNALUSER)

811

Documents (0)

Work Order: 12952782 1/0 TX METER TEMPABAD As-Built

Navigation icons: Home, Search, Print, etc.

12952782

Record View Requisitions Comments Parts Cost Summary Addresses Activities Documents Children Checklist Book Labor Materials Status W/C Billing More

2952782 - 1/0 TX METER TEMP ...
Legacy Work Order: 58719830

ER Number: 460920-CCN
Project: 882003

ice. adv lead time 6-8 weeks, rev requirements.: BUILDING TYPE: SHOP/STORE; CALLER NAME : NIEVES ABAD; CUSTOMER TYPE: CORPORATION/LLC/CLP; av NIEVES ABAD. CaDar Nieves Abad requesting temporary cov; CUSTOMER DESIRED IN-SERVICE DATE 05/12/2023; NEW AMP SIZE: 200A.; NATURE-OF-JOB-TEMPORARY CONSTRUCT; AIR-COND-CENTRAL; APPLIANCES-ELEC WATER HEATER; AIR-COND-BTU-10000; ELECTRIC-HEAT-TYPE-BASEBOARD; SQUARE-FOOT-BUILD-4000; CONSTR-PROG-VACANT LOT; DIST-NEAREST-POLE-LESS THAN 100 FEET; SEND-RATE-CONFIRM-N: PREFR-METER-LOCAT: P - POLE

Created: 04/23/2023 17:45
INFORE@11 (INFORE@11@PFLYER.COM)

460920-CCN

Created: 04/24/2023 09:17
Dase@11 (DASE@11@PFLYER.COM)

adv nieves abad gave tech info regarding cost for work

Created: 05/22/2023 10:19
D'Arde, Valde A (DARD@11@PFLYER.COM)

adv Nieves Abad - there appears to be 3 work orders for same work here. 2 old #s - 58719830 and 5870585 and one new info w/o # 12952782 that does have a corresponding old W/O # to match it up to. While speaking to cust, I did not realize the CEI was completed as no Copy of CEI on this w/o 12952782 or either of the older w/o #s. Asked cust to have inspector re fax under the original w/o 58719830 and we will match them up. exp'd to cust that it would take 6-8 weeks for any work once we recv the inspection.

Created: 08/11/2023 15:07
Fitzgerald, Laura A (LAFITZ@11@PFLYER.COM)

Spoke with Nieves Abad. Adv we did recv inspection as of Friday 8/11, but there is no date scheduled yet. explained that I cannot schedule for him, but once cei was recvd the w/o goes to scheduling dept. Adv to call back in a few days-a week and we can check to see if a date is on the w/o yet.

Created: 08/14/2023 12:49
Kerry Logan R (KLOGAN@11@PFLYER.COM)

NIEVES ABAD called in re: scheduled job completion date, adv it's scheduled to be completed this week, he understood. Is asking that he be contacted when crew is dispatched, email sent to WM & scheduled for the area.

Created: 09/18/2023 10:57
SI Rose, Steve (SROSE@11@PFLYER.COM)

spoke with Nieves 631.575.2348 confirmed week of 9.18.23

Created: 09/19/2023 14:49
KIM, Nicole Ann (CONTRACTOR) (NAC@11@PFLYER.COM)

Sent email to EU, NE Work Mgmt - Nieves is trying to find out when this WO will be completed, was told week of 18th but still not completed.

Created: 09/22/2023 14:08
Berman, Amanda R (ARBACH@11@PFLYER.COM)

adv Nieves Abad, informed customer, the week of 9/26 weather permitted.

Created: 09/26/2023 14:08
Burns, Maura (MURB@11@PFLYER.COM)

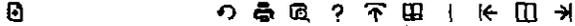
New CSS acct 69413-02009, unable to complete BAC at this time

Created: 10/20/2023 09:57
Youssouf, Boris B (BBOUSS@11@PFLYER.COM)

119

CONFIDENTIAL

Work Order: 12952883 OH POLE AND SECONDARY RELOC AS40



58719831

Record View Requisitions Comments Parts Cost Summary Addresses Activities Documents Children Checklist Book Labor Materials Status I/CS Billing More

12952883 - OH POLE AND SECO...
Legacy Work Order: 58719831
ER Number: 289122-EAM
Project: B60C01

- Sp/W Nieves Abad he wants to service PPL court papers, due to the charge for relocation of poles that are on his property. He claims to have spoken to his county. He says the poles are there illegally and he should have to pay to have them relocated. Explained I would email ROW department and provided OGC #. Sent email ROW agent Dan Walker and CC design tech Thomas Kamoschak.

Created: 06/12/2023 15:21
Maloci, Jessica (JMALOCI@PPLWEB.COM)
- Received a response from Dan Walker he advised that him and Tom were both errors of Mr Abad's position and that Mr. Abad was also made aware of PPL's Position. When and if it becomes necessary he will escalate the matter to the office of general counsel.

Created: 06/12/2023 17:10
Maloci, Jessica (JMALOCI@PPLWEB.COM)
- Caller NIEVES ABABD requested legal department tel # or mailing address to serve us paperwork to have poles removed for Right of Way, provided Office of General Counsel tel # 610-774-5057

Created: 06/15/2023 11:51
Collins, J. P. (JCOLLINS@PPLWEB.COM)
- RELOCATION COST WAIVED BY OGC

Created: 06/27/2023 17:29
Kamoschak Jr, Thomas M. (TKAMOSCHAK@PPLWEB.COM)
- Sp/W Nieves Abad calling to status he knows there was some type of legal thing that that do be worked on. He will reach out to Tom and see if there's a update

Created: 08/25/2023 09:47
Denke, James (JDENKE@PPLWEB.COM)
- Customer still has not paid for damages

Created: 11/19/2023 08:50
Kamoschak Jr, Thomas M. (TKAMOSCHAK@PPLWEB.COM)
- Sp/W Nieves Abad who wanted to know about the cost's regarding the relocation of the poles and the name and number of the engineer. Provided information

Created: 01/04/2024 15:49
Ewert, Marie, Leanne (LEANNETHORRELL@PPLWEB.COM)
- Sp/W Nieves Abad who wanted to know the status of the WO Per the notes under MCS Billing the cost is waived per OGC The ROW was still holding and with FRV Caller stated that trees were already cut. Sent Field Request NE to ROW to release the hold as well as scheduling regarding the waive of the cost.

Created: 02/02/2024 11:54
Ewert, Marie, Leanne (LEANNETHORRELL@PPLWEB.COM)
- Emailed Tom Kamoschak to remove the SPC as the notes under MCD Billing show the cost was waived per OGC

Created: 02/02/2024 12:14
Ewert, Marie, Leanne (LEANNETHORRELL@PPLWEB.COM)
- Customer keeps calling but he needs to pay the invoice because he ripped down our lines twice. He needs to pay 2 BJOs first. He also will not sign ROW until we say that he doesn't have to pay anything. Dan and Tom are aware. Tom will remove SPC when customer pays for BJOs.

Created: 02/05/2024 09:46
Berk, Lisa A. (LJASUHR@PPLWEB.COM)

120

Work Order: 13002156 NIEVES ABAD

58730565

Record View Requisitions Comments Parts Cost Summary Addresses Activities Documents Children Checklist Book Label Materials Status I/CS Billing More

3002168 - NIEVES ABAD
Legacy Work Order: 58730565
ER Number: 469920-CCN
Project: B82503

NO STRUCTURE, AUXILIARY 20' POLE BEING INSTALLED LESS THAN 2, 5' FROM SAID POLE FOR CONSTRUCTION USE, NEW AMP SIZE: 200A, CUSTOMER DESIRED IN-SERVICE DATE 08/10/2023.
ACCEPTED RESPONSIBILITY BUTTON SELECTED BY INITIATOR; CUSTOMER TYPE: BUSINESS OWNER; BUILDING TYPE: SHOP/STORE;; NATURE-OF-JOB-TEMPORARY CONSTRUCT; APPLIANCES-
NONE; SQUARE-FOOT-BUILD-2000; CONSTR-PROG-VACANT LOT; DIST-NEAREST-POLE-LESS THAN 100 FEET; SEND-RATE-CONFIRM-N; PREFR-METER-LOCAT: P - POLE

Created: 07/18/2023 21:37

IPOR@AM UT (TODOR@ALUT@NIEVES.COM)

DUPLICATE SEE 12952782

Created: 07/18/2023 21:47

Kempster, J. Thomas M. (TUMERH0314V2@PPLWEB.COM)

469920-CCN

Created: 07/19/2023 03:25

Database Maint User (DATA@DCENTER@NUSER)

121

Document (0)

DF02 by Project Actual Hours

Year	Report Date	Project ID	Task	Task	Hours	Rate	Hours
2023	4/13/2023	12951338	Journeyman Lineman-FS	Shaffer, Michael	6.0	6.0	6.0
2023	4/14/2023	12951338	Journeyman Lineman-FS	Shaffer, Michael	1.5	1.5	1.5
2023	5/15/2023	12951338	Distr Tech	Kernoschak, Thomas	0.5	0.5	0.5
2023	5/16/2023	12951338	Distr Tech	Kernoschak, Thomas	0.5	0.5	0.5
2023	5/17/2023	12951338	Distr Tech	Kernoschak, Thomas	0.5	0.5	0.5
2023	5/18/2023	12951338	Distr Tech	Kernoschak, Thomas	0.5	0.5	0.5
2023	5/19/2023	12951338	Distr Tech	Kernoschak, Thomas	0.5	0.5	0.5
Total					10.0	10.0	10.0

122

DATE OF DEPOSIT
 MAR 15 2025
 PA PUBLIC UTILITY COMMISSION
 SECRETARY'S BUREAU



TWO NORTH NINTH STREET
ALLENTOWN PA 18101-1179

INVOICE NUMBER
91130032-3

INVOICE DATE
01/01/00

TOTAL AMOUNT
3,176.24

NIEVES P. ABAD
747 DELAWARE ST.
FOREST CITY, PA 18421

FPL CONTROL ACCOUNT: 014350

MAKE CHECKS PAYABLE TO:
PPL Electric Utilities Corp

3 3900031762490003176249 9113003200

AMOUNT PAID

TO INSURE PROPER CREDIT, PLEASE RETURN THIS PORTION WITH PAYMENT IN ENCLOSED ENVELOPE
TO: PPL CORPORATION PO BOX 25222 LEHIGH VALLEY, PA 18002-5222

NIEVES P. ABAD
747 DELAWARE ST.
FOREST CITY, PA 18421

REFER ALL INQUIRIES TO:
OGC Claims Office 800-748-7104

PLEASE REFER TO THIS NUMBER WHEN
CALLING OR WRITING: 91130032-3

ITEM	DESCRIPTION	AMOUNT
1	Property Damage Cost of repairing damage to our property located at Amity Court, Scranton, PA Incident date: April 13, 2023 WR # 88718837 Claim # 2023-00453	0.00
2	Labor	2,755.21
3	Vehicle Usage Charges	253.36
4	Materials	1,167.67

Payment Due: Net 30

DRAFT
DATE OF DEPOSIT
MAR 15 2025
PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

91130032-3
INVOICE NUMBER

01/01/00
INVOICE DATE

3,176.24
TOTAL AMOUNT

PPL Electric Utilities Corp
TWO NORTH NINTH STREET, ALLENTOWN, PA 18101-1179

Sub Project	Work Order	Budget Item	SRC	System Source	Journal ID	Vendor Name	Voucher - PSA	Catalog #	Actual Hours ACT	Actual Hours BLD	Actual Amount ACT	Actual Amount BLD
EAM	12951338	11000	0453	PTL	AGBILL9083					0.0		184.14
EAM	12951338	11000	0453	PTL	PTL0018999		OT15CN		5.0		480.61	
EAM	12951338	11000	0453	PTL	PTL0018999		OT20CN		1.0		118.00	
EAM	12951338	11000	0453	PTL	PTL0018999		OTP15		0.0		34.93	
EAM	12951338	11000	0453	PTL	AGBILL0353					0.0		48.04
EAM	12951338	11000	0453	PTL	PTL0010248		OT15CN		0.0		0.00	
EAM	12951338	11000	0453	PTL	PTL0010248		OT20CN		1.5		178.99	
EAM	12951338	11000	0453	PTL	PTL0010248		OTP15		0.0		0.00	
EAM	12951338	11000	0451	PTL	AGBILL2431					0.0		76.73
EAM	12951338	11000	0451	PTL	PTL0012323		OT15PN		2.5		238.08	
EAM	12951338	11000	0451	PAC	PAC0012341		OT15PN		10.0		952.40	
EAM	12951338	11000	0451	PAC	PAC0012348		OT15PN		-10.0		-952.40	
EAM	12951338	11000	0451	PAC	PAC0012521		OT15PN		-10.0		-952.40	
EAM	12951338	11000	0451	PAC	PAC0012529		OT15PN		10.0		952.40	
EAM	12951338	69000	0453	PTL	LDG9009083				0.0		4.91	
EAM	12951338	69000	0453	PTL	LDG9000353				0.0		1.42	
EAM	12951338	69000	0451	PTL	LDG9002431				0.0		1.91	
EAM	12951338	69000	0451	PAC	LDG9002421				0.0		0.00	
EAM	12951338	69000	0451	PAC	LDG9002803				0.0		0.00	
EAM	12951338	69020	0453	PTL	LDG9209083				0.0		245.42	
EAM	12951338	69020	0453	PTL	LDG9200353				0.0		70.80	
EAM	12951338	69020	0451	PTL	LDG9202431				0.0		95.23	
EAM	12951338	69020	0451	PAC	LDG9202421				0.0		0.00	
EAM	12951338	69020	0451	PAC	LDG9202803				0.0		0.00	
											1,448.30	306.91 1,755.21
EAM		14000	0453	TRP	TRP0020291				0.0		77.63	
EAM		14000	0453	TRP	TRP0028038				0.0		100.19	
EAM		14000	0451	TRP	TRP0022354				0.0		12.13	
EAM		14000	0451	TRP	TRP0022625				0.0		3.10	
EAM		14000	0451	TRP	TRP0022625				0.0		3.10	
EAM		14D00	0453	ALP	ALP1000320				0.0		59.52	
EAM		14D00	0451	ALP	ALP1002916				0.0		4.97	
EAM		14D00	0451	ALP	ALP1005515				0.0		1.08	
											253.36	
		24000		Material							1,005.33	
				Pole Disposl (2)							162.34	
											1,167.67	
EAM	EAM Sub-Total								10.0	0.0	1,701.66	308.91
Total									10.0	0.0	1,701.66	308.91
	162.34	499304-100-400		Lab		1,755.21					308.91	A&G
	1701.66	12951338-098-470		Veh		253.36					162.34	Pole Disp
	1005.33	804300-1-470		Mat		1,167.67					1,005.33	Material
	308.91	045610-400				3,176.24					3,176.24	
	3176.24											

APPROVED FOR

- | | |
|---|--|
| <input type="checkbox"/> BUILDING | <input checked="" type="checkbox"/> ELECTRICAL |
| <input type="checkbox"/> DEMOLITION | <input type="checkbox"/> PLUMBING |
| <input type="checkbox"/> FOOTING (Pre Pour) | <input type="checkbox"/> MECHANICAL |
| <input type="checkbox"/> SLAB (Pre Pour) | <input type="checkbox"/> FIRE PROTECTION |
| <input type="checkbox"/> ACCESSIBILITY | <input type="checkbox"/> INSULATION |
| <input type="checkbox"/> OTHER _____ | <input type="checkbox"/> DRY WALL |

Inspection Type: 21st - 5740108

Permit Number: 53101269

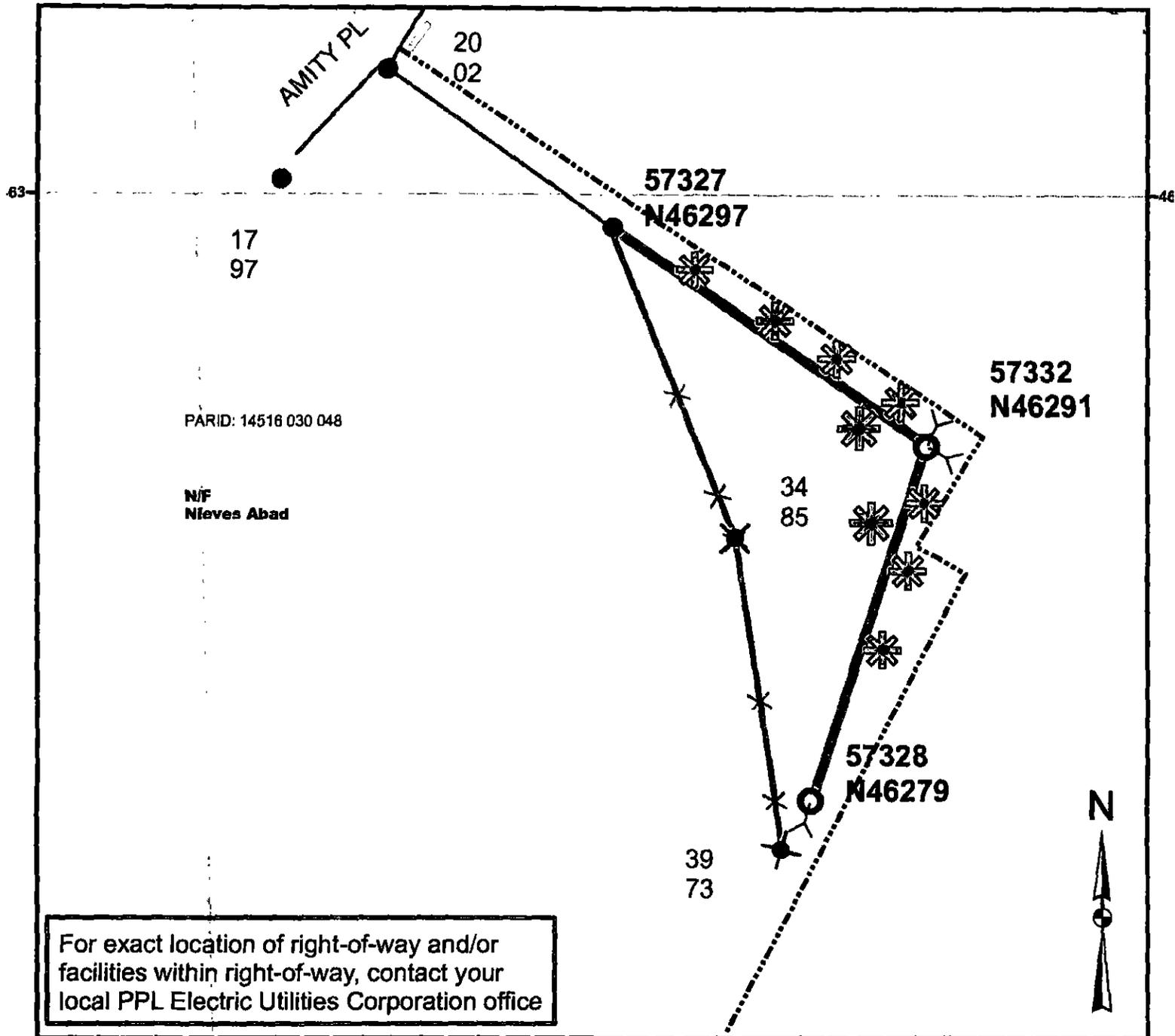
Inspector Name: 43302

Date: 5-11-23 Time: _____

Comments: 200' Area

1840 1st Temp sensor

177 53730565

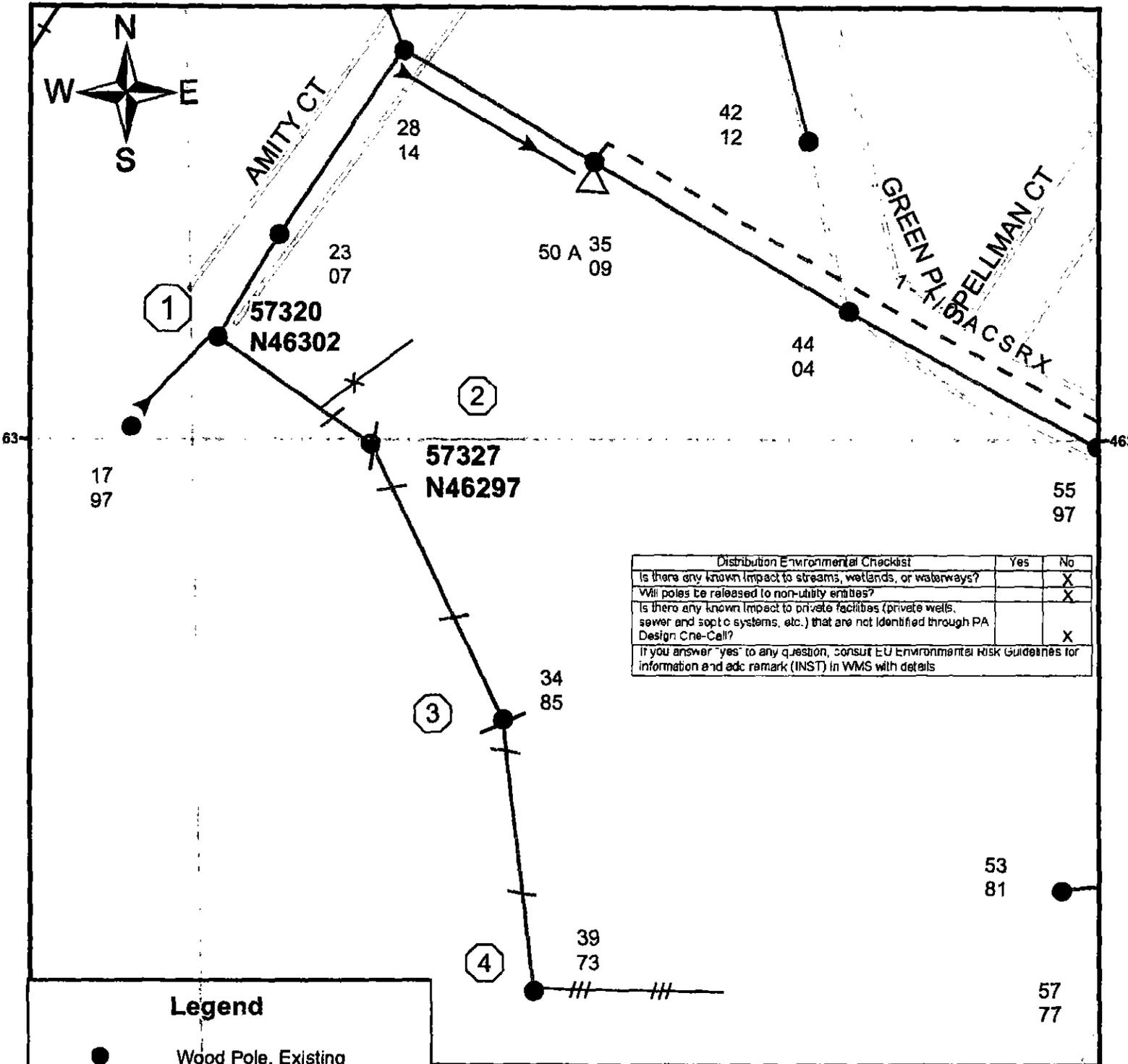
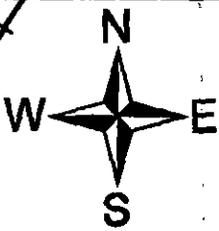


Legend	
	Anchor Guy, Proposed
	Pole, Remove
	Pole, Proposed
	Pole, Existing
	Overhead Wires, Existing
	Overhead Wires, Proposed
	Overhead Wires, Remove
	Treework, By Customer
	Approximate Property Line

Not for Construction

WO/Design: 12952883/309256	PLAN SHOWING FACILITIES ON PROPERTY OF:
ER: 289122	
REGION: NORTHEAST	CITY OF SCRANTON LACKAWANNA COUNTY
SCALE: N.T.S.	PPL Electric Utilities Corporation ALLENTOWN, PENNA.
DATE: 6/6/2023	SIGNATURE: DATE:
ENGR: Kernoschak, T.M.	DWG. NO.: 12952883-309256-R/W-0

127



Distribution Environmental Checklist		Yes	No
Is there any known impact to streams, wetlands, or waterways?			X
Will poles be released to non-utility entities?			X
Is there any known impact to private facilities (private wells, sewer and septic systems, etc.) that are not identified through PA Design One-Call?			X
If you answer "yes" to any question, consult E.U. Environmental Risk Guidelines for information and add remark (INST) in WMS with details			

Legend	
	Wood Pole, Existing
	Wood Pole, Replace
	OH Transformer, Existing
	Streetlight, Existing
	Primary OH, 1, Existing
	Secondary OH, Replace
	Secondary OH, Existing
	Service OH, Existing
	Service OH, Removal
	Span Guy, Single, Existing

WO/Design: 12951338/307480	PPL Electric Utilities Corporation Allentown, PA
ER: 12951338	Scope of Work / Construction Details For:
SCALE N.T.S.	BJO 57327N46297 2 POLES, 3 SPANS SECONDARY, CONFIRMING AMITY COURT OFF GREEN PLACE CITY OF SCRANTON LACKAWANNA COUNTY
REGION: NORTHEAST	
DATE: 4/17/2023	
ENGR: Kernoschak, Thomas M	DWG. NO.: 12951338/307480-C-00

128

Summary of Estimated Costs

Work Order:	12951338		
Work Order Description:	BJO-57327N46297-TREE CONFIRMING		
ER #:	12951338-EAM		
Equipment:	57327N46297		
Location:	L-57327N46297		
Work Address:	AMITY COURT SCRANTON		

Capital Costs

Capital Costs - Labor:	\$	2,221.59
Capital Costs - Material:	\$	455.45
Capital Total:	\$	2,677.04

Capital / O&M Split

Capital %	100.00
O&M %	0.00

Capital Costs By Activity

Activity	Activity Type	Trade	Hours	Labor Cost	Material Cost	Total Cost
40	Frontline Worker - Physical Construction	D-LINE	16.34	\$ 2,221.59	\$ 455.45	\$ 2,677.04
Capital Cost Subtotal			16.34	\$ 2,221.59	\$ 455.45	\$ 2,677.04

Capital Removal Cost by Activity

Activity	Activity Type	Trade	Hours	Labor Cost	Material Cost	Total Cost
40	Frontline Worker - Physical Construction	D-LINE	13.21	\$ 1,796.84	\$ 0.00	\$ 1,796.84
Capital Removal Cost Subtotal			13.21	\$ 1,796.84	\$ 0.00	\$ 1,796.84

Total Capital Costs	29.55	\$	4,018.43	\$	455.45	\$	4,473.88
----------------------------	-------	----	----------	----	--------	----	----------

O&M Costs By Activity

No O&M Costs

Overall Grand Total	29.55		4,018.43		455.45		4,473.88
----------------------------	-------	--	----------	--	--------	--	----------

Additional Activities

Activity	Activity Type	Trade	Hours	Labor Cost	Material Cost	Total Cost
10	Frontline Worker - Physical Construction	RTC	8.00	\$ 1,088.00	\$ 0.00	
20	Engineering	DESIGN TECH	5.00	\$ 541.30	\$ 0.00	
	Additional Activity Subtotal		13.00	\$ 1,629.30	\$ 0.00	\$ 1,629.30

Additional Cost
No Data Available

Reimbursements:			\$ 0.00
------------------------	--	--	---------

Total Cost of Job:			\$ 6,103.18
---------------------------	--	--	-------------

Total Project Hours:			42.55
-----------------------------	--	--	-------

DATE OF DEPOSIT

MAR 15 2025

PA PUBLIC SECRETARY

2390 Information		
	Direct Costs	Fully Allocated Costs
Material:	601.73	742.88
Construction Labor:	977.50	2,221.60
Total Specific Construction:	1,579.24	2,964.48
Engineering & Supervision - Labor:	200.28	541.3
Total Property Additions:	1,779.52	3,505.78
Removal Costs - Labor:	790.62	1,796.86
Operating & Maintenance Costs - Labor:	0.00	0.00
Operating & Maintenance Costs - Material:	0.00	0.00
Total Construction and Associated Costs:	\$2,570.14	\$5,302.64
Administrative and General Expense (26.2% of Direct Labor):	0.00	1,194.66
Additional Cost:		
Subtotal:	\$2,570.14	\$6,497.30
Cost to be Billed (Customer Payment):	\$2,570.14	\$6,497.30

Construction Report - by Workpoint

Work Order	12951338	Region	Northeast				
Work Order Desc	BJO-57327N46297-TREE CONFIRMING	Service Center	830-1				
Responsible Engineer	42990	Location	L-57327N46297				
Equipment	57327N46297	Sched. Start Date	Apr 15, 2023 12:00:00 AM				
Work Address	AMITY COURT SCRANTON	RIS Date	Jun 14, 2023 12:00:00 AM				
Parent Work Order							
Parent Work Order Desc.			<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 50%;">Child WOs</td> <td style="width: 50%;">Child WO Desc.</td> </tr> <tr> <td colspan="2" style="text-align: center;">No Data Available</td> </tr> </table>	Child WOs	Child WO Desc.	No Data Available	
Child WOs	Child WO Desc.						
No Data Available							

132

REPORT DETAILS

Report Filter:
ApplyComparison("upper(=0)=upper(=1)",Structure_Grid (ID),"57334N42665") And (Structure_Grid = 57334N42665)

PROMPT DETAILS

Prompt 1: Please enter a structure grid to search for:
57334N42665

Structure_Grid	Structure Type	Structure Subtype	Struct Type	Structure Install Date	Owner	Vegetation	Location	Install	Class	Material
57334N42665	Distribution Pole	Wood Pole	Single Pole	5/15/1998	PPL Owned	PPL ELECTRIC UTILITIES CORP		N21103	5	Pine-Crossot

DATE OF DEPOSIT

MAR 15 2025

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

Data rows: 1 | 1

PLANT OPERATING	REINFORCING LOCATION	POTENTIAL PROBLEM	POTENTIAL PROBLEM DAY	POTENTIAL PROBLEM DAY	LOWER VOLT	REMARKS
35	35	Unknown				

134

REPORT DETAILS

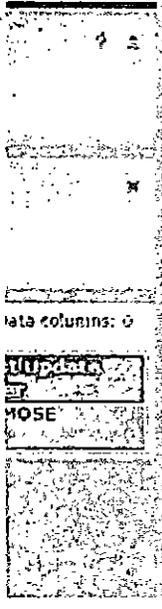
Report Filter:
 ApplyComparison("upper(#0)=upper(#1),Structure_Grid (ID),"57317N46297") And (Structure_Grid = 57317N46297)

PROMPT DETAILS

Prompt 1: Please enter a structure grid to search for:
 57317N46297

Structure_Grid	Structure Type	Structure Subtype	Structure Type	Structure Install Date	Owner	Vendor/Owner	Location	Install	Class	Material
57317N46297	Distribution Pole	Wood Pole	Single Pole	10/15/1979	PPL Owned	PPL ELECTRIC UTILITIES CORP	# 35175	3		Pine-Crossot

Pole ID	Operating	Reinforcing Treatment	Pole Next Inspection Day	Pole Next Painting Day	Pole Reinforcing Day	Tower	Tower	Remarks	Op
30	30	C-Truss	Unknown						05



REPORT DETAILS:

Report Filter:
ApplyComparison("upper(=0)=upper(#1)",Structure_Grid (ID),"57339N46273") And (Structure_Grid = 57339N46273)

PROMPT DETAILS

Prompt 1: Please enter a structure grid to search for:
57339N46273

Structure_Grid	Structure Type	Structure Subtype	Struct. MFG	Structure Install Day	Owner	Vested Owner	Location	Installation	Class	Material
57339N46273	Distribution Pole	Wood Pole	Single Pole	5/15/1970	PPL Owned	PPL ELECTRIC UTILITIES CORP		01719	5	Pine-Creosote

Data rows: 1

PI	Pre Cut HL	Operating HL	Reinforcing	Treatment	Pole Next Day	Inspection Day	Pole Next Day	Painting Day	Pole Reinforcing Day	Tower Type	Tower Volt	Remarks
	35	35		Unknown								

Data columns: (

Estimate
Open
42990

REPORT DETAILS

Report Filter:

ApplyComparison("upper(#0)=upper(#1)",Structure_Grid (ID),"57320N46302") And (Structure_Grid = 57320N46302)

PROMPT DETAILS

Prompt 1: Please enter a structure grid to search for:
57320N46302

Structure_Grid	Structure Type	Structure Subtype	Structure Type	Structure Install Date	Owner	Owner	Location	Install	Class	Material
57320N46302	Distribution Pole	Wood Pole	Single Pole	9/15/1976	PPL Owned	PPL ELECTRIC UTILITIES CORP.		20010	5	Pine-Creosote

Data rows: 1 | 0

Pole Cut M	Operating M	Reinforcing treatment C	Pole Next Inspection Day	Pole Next Painting Day	Pole Reinforcing Day	Lower Type	Lower Val	Remark	As Op
35	35		Unknown						

REPORT DETAILS

Report Filter:
ApplyCompanson("upper(#0)=upper(#1)",Structure_Grd (ID);"57327N46297") And (Structure_Gnd = 57327N46297)

PROMPT DETAILS

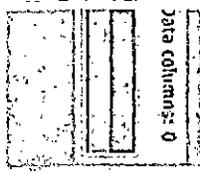
Prompt 1: Please enter a structure grid to search for:
57327N46297

Structure_Grid	Pole Install Day	Pole Transfer Day
57327N46297	1/15/1933	4/8/1970

Data rows: 1 | 1

Reason Desc	Material Desc	PAC CURR	OPR	TONE WP
C-Tagged Pole	Pine-Creosote	0	35	

147



8

9

L SERVICE

MAIL

Retail

POSTAGE REQUIRED

PLACE STICKER AT TOP OF ENVELOPE TO THE RIGHT OF THE RETURN ADDRESS, FOLD AT DOTTED LINE
CERTIFIED MAIL



9589 0710 5270 0929 9125 66



17105

RDC 03

U.S. POSTAGE PAID
PM
FOREST CITY, PA 18421
MAR 15, 2025

\$18.00
R2305P151165-8

estic use.
urance (restrictions ap
estic and many inter
laration form is required.
arding claims exclusions see the Domestic
for availability and limitations of coverage.

FROM:
Neves Abad
747 Delaware St
Forest City PA 18421

MAR 18 2025
TO:

Secretary of the commission
400 North St
2nd Floor North
P.O. Box 32065
Harrisburg PA 17105

**PE
NAL**



CMPC
717-705-1952

To: PUC SECRETARY BUREAU

Agency: PUC
Floor:
External Carrier: PRIORITY

3/18/2025 7:57:50 AM



9589071052700929912566

ED

This packaging is the property of the U.S. Postal Service and is provided solely for use in sending Priority Mail and Priority Mail International shipments.