

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

To Whom This May Concern,

I am enclosing herein one copy of Certificate Of Service evidencing the service for Complainant's Reply To Answer and New Matter Of PPL Electric Utilities Corporation To The Amended Complaint of Nieves Abad. By copy of this correspondence directed to Respondent I am serving him with a copy of the same

CC:

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

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

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

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Nieves Abad  
747 Delaware St  
Forest City , PA 18421  
Email- Martjua3@aol.com  
Phone - 631-575-2348  
Dated- March 31, 2025

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BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

Nieves Abad  
(Pro-Se)

Complainant

CERTIFICATE OF SERVICE

VS

PPL Electric Utilities Corporation

C-2024-3047163

Respondent

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**CERTIFICATE OF SERVICE**

I, Nieves Abad, hereby certify that I served Complainant's Reply To Answer and New Matter Of PPL Electric Utilities Corporation To The Amended Complaint of Nieves Abad to Respondent via certified mail and via email this 31st day of March 2025, addressed as follows;

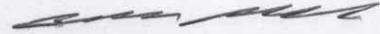
I hereby certify that a true and correct copy of the foregoing has been served upon the following persons, in the manner indicated, in accordance with the requirements of 52 Pa. Code § 1.54.

CC:

Alphonso Arnold III  
Administrative Law Judge  
Office of Administrative Law Judge  
Pennsylvania Public Utility Commission  
400 North St, Harrisburg Pa 17120  
Email- [alphonarno@pa.gov](mailto:alphonarno@pa.gov)

Rosemary Chiavetta  
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P.O BOX 3265  
Harrisburg, PA 17105-3265

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

To The Secretary Of The Commission,

Attached is Complainant's Reply To Answer and New Matter Of PPL Electric Utilities Corporation To The Amended Complaint of Nieves Abad which is being filed Upon Respondent by Nieves Abad in the Above-referenced proceeding. Copies will be provided as indicated on the Certificate of Service.



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Nieves Abad  
747 Delaware St  
Forest City, PA 18421  
Martjua3@aol.com  
631-575-2348  
Dated March 31, 2025

Cc:  
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Administrative Law Judge  
Office of Administrative Law Judge  
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BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

Nieves Abad  
(Pro-Se)

Complainant

vs.

PPL Electric Utilities Corporation  
Respondent

AFFIDAVIT

Docket No. C-2024-3047163

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**AFFIDAVIT**

I, Nieves Abad, verify that I am the Complainant in the Complaint, and that the facts contained in the foregoing Complainant's Reply to PPL Answers to Amended Formal Complaint and New Matter For the Amended Formal Complaint Of Nieves Abad 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](mailto:alphonarno@pa.gov)

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BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

Nieves Abad

(Pro-Se)

Complainant

Reply To PPL Answers To Amended Formal

Complaint and New Matter

VS

PPL Electric Utilities Corporation

C-2024-3047163

Respondent

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**COMPLAINANTS REPLY TO ANSWER AND NEW MATTER OF PPL ELECTRIC UTILITIES CORPORATION TO THE AMENDED COMPLAINT OF NIEVES ABAD**

**TO THE PENNSYLVANIA PUBLIC UTILITY COMMISSION:**

Nieves Abad, (hereon in Complainant) files this reply to PPL ELeetric Utility Corporation (hereon in PPL) Answer and New matter to the amended complaint of Nieves Abad pursuant section Pa Title 52 Chapter 5 Code 5.63 to the Pennsylvania Public Utility Commission Regulations, (hereon in PUC) and responds to the separately- numbered paragraphs incorporating section 1-12 of the Amended Formal Complaint Of Nieves Abad and as follows:

**Reply To PPL's Answers To The Amended Formal Complaint Of Nieves Abad**

1. PPL now claims utility pole # 57334N42685 is in Springbrook Township. Pole # 57334N42685 is not located in Springbrook Township. Utility pole # 57334N42685 is located on the Complainant's property. ( See Appendix 1 pictures of poles.) PPL has admitted this pole to be located at 837 Rear Capouse Ave Scranton Pa 18509 (hereon in Complainants property) in its Original Answer To The Original Formal Complaint Of Nieves Abad on 03/27/24. PPL also admitted in their Original Answers To The Original Complaint that PPL does not have a valid easement for utility pole # 57334N42685. PPL has also admitted in the above answers that PPL does not have a valid right of way (hereon in ROW) for pole # 57327N46297, 57334N42685, and 57339N46273. The most recent publication of the National Association of Regulatory Utility Commissioners (hereon in NARUC) entitled "Regulations to Govern the Preservation of Records of Electric Gas and Water Utilities Revised October 2007 section 6 (B6) easements. The minimum retention period for utility pole is the life of the corporation." PPL also admitted the same in its Original Preliminary Objections To The Original Complaint on 03/27/24. The Administrative Law Judge Alphonso Arnold III ( hereon in ALJ) also notes PPL stating this utility pole is on the complainants property and PPL has admitted not to have a ROW Easements in the Original order Granting In Part and Denying In Part the original Preliminary Objections Of PPL to the Original Complaint. This inaccuracy should be stricken from the records.

PPL states pole # 57316N46296 does not exist in the PPL system. This is a PPL owned utility pole on the Complainants property. ( See Appendix 2 pictures of poles) It has been inspected by OSMOSE, a PPL contractor on at least two occasions. The inspection tags in the picture in the above Appendix 2 is proof of this. PPL has failed to maintain adequate records for this pole. PPL has stated in the Answers To The Amended Formal Complaint Of Nieves Abad section 1 paragraph 2 "pole 57316N46296 does not exist in PPL's electrical system" This makes utility pole # 57316N46296 not in compliance with Pa. Title 52 Chapter 57 Code 57.198 (M).

(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.

Recordkeeping is required as an electric distribution company (hereon in EDC) operating in the State Of Pennsylvania (hereon in PA) to ensure public safety. (Pa Title 52 Chapter 57 Code 57.194 (2)

(2) An EDC shall inspect, maintain and operate its distribution system, analyze reliability results, and take corrective measures as necessary to achieve performance benchmarks and performance standards.

**This is a violation of Pa Title 66 Chapter 15 Code 1501**

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.

PPL not having records for this pole has caused a public safety concern. Without records of this pole. The pole has to be declared unsafe under PA Law. No records exist for utility pole # 57316N46296 admitted by PPL. This includes a valid easement. Without records this pole should be ordered removed immediately. Having records is a part of pole safety as is the condition of the pole itself.

2. PPL has denied being in violation of codes in section 2 of the Amended Formal Complaint Of Nieves Abad. PPL has not submitted a reason for why they are not in violation of these codes. PPL has not submitted documentary evidence to the contrary of being in violation of these codes. PPL has not met the burden of proof needed to sustain its denials.

3. PPL has admitted to having contact with the Complainant from March of 2023. PPL has submitted into discovery phone conversations recorded in work orders between the Complainant and PPL employees. Complainant called PPL to request pole # 57334N426585, pole # 57339N46273, and the wires that run between them be removed, dropped, and/or de-energized. (See Appendix 3 Work order ) These are not all the contacts about utility poles and wires being removed, relocated, dropped and/or de-energized made to PPL. Complainant, talked to several other PPL employees and discovery is still pending. These work order documents show on 03/29/23, 04/23/23, 04/24/23, and 04/26/23 the Complainant contacted PPL. The documents described the Complainant asking PPL to remove, relocate, drop, and/or de-energize wires for PPL owned utilities on the Complainants property. These documents also show that at least on two occasions PPL employees or subcontractors were dispatched to the Complainants property before each accident occurred. On at least one of the documents it shows PPL employee Tom denying the request to remove, relocate, drop, or de-energize utility poles on the Complainants property for tree removal. Tom states "I explained to the customer that poles cannot be moved until customers and street lights are refed." (See Appendix 3 page 36 work order) After each

accident the Complainant inquired further within PPL to have utility poles and wires removed, relocated, dropped, and/or de-energized. Tom PPL's electric design technician spoke with the Complainant on at least one occasion after the first accident on 04/13/23 that PPL admits to. ( See PPL's Answer To The Amended Formal Complaint of Nieves Abad Section 3 paragraph 2. Tom was aware of the vegetation problem in and around PPL's alleged ROW on the Complainants property before, during, and after each accident. In PPL's answers to the Formal Complaint it was admitted that Tom said to the Complainant "Advised him to conduct any tree removal carefully to avoid damage to the company's equipment and facilities." Complainant denies this being said during the conversation about tree removal, but if it was taken to be true "Advised him to conduct any tree removal carefully" is not the appropriate course of action of a PPL employee. This employee's job was to make PPL aware of a construction zone being developed in and around PPL's alleged ROW. This employee's job was to, at minimum, create a work order to remedy the vegetation problem in and around PPL's alleged ROW. Tom and other employees were well aware of the tree cutting and the construction zone activities before and after each accident. Tom should have stopped the Complainant from tree cutting activity from in and around PPL's alleged ROW. If not the first incident, PPL is responsible for both of the following incidents. PPL and dozens of PPL employees were well aware of tree cutting and construction activities in and around the alleged PPL ROW after the first accident occurred.

"A public utility not only has the responsibility to conduct vegetation management but a right to do so, as well. It is never appropriate for a landowner to assume, or impinge upon, such a utility right because landowners' self-help remedies create safety and reliability issues. For example, in Yanling Chen and Jianming Huv. Metropolitan Edison Co., Docket No. C-2013-2397061, 2015 Pa. PUC LEXIS 149 (Initial Decision dated Mar. 30, 2015), the landowners alleged that utility vegetation management was not necessary and asserted that tree cutting should be left to the landowner whose trees and planting would be affected. That claim was rejected in the Initial Decision, which found that leaving vegetation management in the hands of the property owner through pruning jeopardizes the safety and reliability of the transmission line and requires the Company to police such activities to prevent outages."

PPL's own policies for its distribution utilities require vegetation to be cleared in its wire zone and its dangerous tree clearing policies. (See Appendix 4 PPL's vegetation policies ) These policies describe a minimum vegetation clearance zone. PPL's policies is that PPL would hire contractors to clear vegetation within these zones when brought to the attention of PPL (See appendix 4 PPL's vegetation policies) Instead PPL has passed its duties as an EDC to the Complainant by requiring him to maintenance vegetation in and around PPL's alleged ROW of hazardous trees which resulted in three accidents. This acknowledgment by PPL and admission of its design tech is the admission of PPL passing its duties to the Complainant. This is in violation of Pa Title 66 chapter 15 section 1501. Leaving the Complainant to cut trees that were tangled with PPL's live distribution lines is an admission of PPL employees negligence of his actions and inactions. If this doesn't prove PPL's actions or inactions resulted in the accident on 04/13/23. The accidents on 05/25/23 and 06/06/23 was a result of PPL actions and inactions. After the first accident PPL was aware of the vegetation conditions in and around its alleged ROW. Complainant asks for removal and relocation utility pole numbers 57334N42685, 57339N46273, 57327N46297 and 57316N46296. PPL has admitted these four poles are on the Complainants property. PPL has admitted that these poles do not have a ROW easement. These admissions by PPL have been submitted to the PUC through The Original Answers To The Original Formal Complaint, The Preliminary Objections To The Original Formal Complaint, The Answers To The Amended Formal Complaint, and The Preliminary Objections To The Amended Formal Complaint.

4. PPL has hired OSMOSE as a contractor that did at least two inspections on each of the utility poles in this complaint. OSMOSE has also completed other work on these utility poles in this complaint. PPL has not submitted a single document into evidence as to the conditions of PPL owned utilities in this complaint. Dozens of PPL employees from different departments evaluated or did repairs to the utility poles, wires, and alleged ROW in this complaint. PPL has not submitted one document into evidence as to the conditions of PPL alleged ROW. PPL has admitted to the accident that occurred on 04/23/23. PPL has stated in its answers that PPL can not conclude whether the Complainant called PPL for its utilities to be dropped and de-energized and removed several times. PPL has also submitted into discovery call center

details that were captured in the work order document. (See Appendix 3 PPL work orders) In these documents call center details were recorded on work orders that were disclosed. In these documents there are dates and times where notes were logged. These are not all the logs that exist and discovery is still ongoing, as the Complainant is still seeking data from PPL. The following events are described in the documents provided by PPL. On 03/29/23, the Complainant spoke with a PPL employee from the call center. During this call, the Complainant asked PPL to send a PPL engineer to the Complainants property to evaluate PPL facilities on the property. On that day, the Complainant requested a new service. Also Complainant made this PPL representative aware that a new building was being constructed on the property, and that new construction was taking place at Complainants property. Complainant also asked for pole # 57334N42685 and pole # 57339N46273 and the wires attached to them to be removed, replaced, dropped or de-energized for tree removal. (See Appendix 3 page 32 work orders) There have been other contacts before the accidents but this is the information provided by PPL at this time. This first accident happened on 04/13/23 after PPL employees refused to remove, relocate, drop, and/or de-energize PPL owned facilities or to assist with tree removal in and around PPL alleged ROW for trees tangled with live distribution lines. Following this accident this documentation shows several more contacts. ( See Appendix 3 page 34, 35, 36 & 37 work orders) On 04/23/23, Compliant requested Pole # 57334N42685 and 57339N46273 be removed. On 04/24/23, Complainant again called in informing PPL employees through the call center that tree cutting was being done on the Complainants property and there were trees entangled around wires pole to pole. Complaint requested assistance with removing these trees. (See Appendix 3 page 34 work orders) Also on 04/24/23, Tom replied to this work order stating “ I explained to the customer that poles can't be moved until customers and street lights are refed.” (See Appendix 3 page 36 work orders) On 04/26/23, Complainant again calls into PPL call center after meeting with a subcontractor on the Complainants property from Environment Contractors Inc (hereon in ECI). PPL employee from the call center wrote on that date “Caller removing trees needs temporary disconnect, advised someone would reach out within 10 days to review” (See Appendix 3 page 33 work orders) These requests were also denied by PPL employees Tom and PPL employee Daniel Walker. ( hereon in Dan)

On 05/25/23, the second accident occurred followed by a third accident on 06/06/23. PPL's admissions and PPL provided documents shows the Complainant gave PPL ample notice of tree removal. At minimum a work order to resolve the vegetation issue should have been made by PPL employees. PPL employees were aware of the work being done in and around PPL's ROW. PPL employees did not follow policy and should have stopped the Complainant from engaging in tree removal in PPL's alleged ROW that was tangled with live utility wires. The conditions of the vegetation surrounding PPL's facilities created unsafe conditions for tree removal. PPL is at fault through decades of negligence and unlawful acts of vegetation management practices in and around PPL's alleged ROW. PPL employees refused or did not remedy the vegetation problem after seeing it and once being made aware of the conditions by the Complainant.

These three accidents could have been avoided. PPL dispatched employees and subcontractors to Complainants property to resolve these issues. The Complainant has on at least these four dates disclosed by PPL made contact with PPL to resolve this vegetation management issue. PPL employees and subcontractors ignored or denied these four requests to resolve this issue. PPL has not provided an explanation as to why the vegetation was left up to the Complainant to be removed. PPL has not denied the vegetation growth in and around PPL's alleged ROW before, during, or after each incident. PPL has provided evidence and admission that they have put Complainant safety at risk by denying a service request which led to property damages and outages. PPL denied the Complainant's request for help to remove trees in and around PPL's alleged ROW for trees that were tangled with PPL utility poles and wires . PPL and PPL employees deemed the service request made by the Complainant for utility poles and wires to be removed, relocated, dropped, and/or de-energized so that trees can be removed, an unreasonable service request. PPL has also admitted in this section that "PPL lacks the sufficient knowledge or information as to the precise effects of the service outage for various of its customers due to the actions of the complainant." This in itself is a violation of the preservation of record under PA Title 52 Chapter 57 Code 57.45. PPL is required by law to record and retain these records. These are more

incomplete and/or missing records. PPL has put the safety of the complainant at risk by violating Pa Title 52 Chapter 15 Section 1501.

5. PPL admitted to the accident on 05/25/23. PPL has stated in its answers that PPL can not conclude whether the Complainant called PPL for its utilities to be dropped and de-energized and removed several times. PPL has also submitted into discovery call center details that were captured in the work order document. (See Appendix 3 PPL work orders) In these documents call center details were recorded on work orders that were disclosed. In these documents there are dates and times where notes were logged. These are not all the logs that exist and discovery is still ongoing, as the Complainant is still seeking data from PPL. The following events are described in the documents provided by PPL. On 03/29/23, the Complainant spoke with a PPL employee from the call center. During this call, the Complainant asked PPL to send a PPL engineer to the Complainants property to evaluate PPL facilities on the property. On that day, the Complainant requested a new service. Also Complainant made this PPL representative aware that a new building was being constructed on the property, and that new construction was taking place at Complainants property. Complainant also asked for pole # 57334N42685 and pole # 57339N46273 and the wires attached to them to be removed, replaced, dropped or de-energized for tree removal. (See Appendix 3 page 32 work orders) There have been other contacts before the accidents but this is the information provided by PPL at this time. This first accident happened on 04/13/23 after PPL employees refused to remove, relocate, drop, and/or de-energize PPL owned facilities or to assist with tree removal in and around PPL alleged ROW for trees tangled with live distribution lines. Following this accident this documentation shows several more contacts. ( See Appendix 3 page 34, 35, 36 & 37 work orders) On 04/23/23, Compliant requested Pole # 57334N42685 and 57339N46273 be removed. On 04/24/23, Complainant again called in informing PPL employees through the call center that tree cutting was being done on the Complainants property and there were trees entangled around wires pole to pole. Complaint requested assistance with removing these trees. (See Appendix 3 page 34 work orders) Also on 04/24/23, Tom replied to this work order stating “ I explained to the customer that poles can't be moved until customers and street lights are refed.” (See Appendix 3 page 36 work orders) On 04/26/23,

Complainant again calls into PPL call center after meeting with a subcontractor on the Complainants property from Environment Contractors Inc (hereon in ECI). PPL employee from the call center wrote on that date "Caller removing trees needs temporary disconnect, advised someone would reach out within 10 days to review" (See Appendix 3 page 33 work orders) These requests were also denied by PPL employees Tom and Daniel Walker. ( hereon in Dan) On 05/25/23, the second accident occurred followed by a third accident on 06/06/23. PPL's admissions and PPL provided documents shows the Complainant gave PPL ample notice of tree removal. At minimum a work order to resolve the vegetation issue should have been made by PPL employees. PPL employees were aware of the work being done in and around PPL's ROW. PPL employees did not follow policy and should have stopped the Complainant from engaging in tree removal in PPL's alleged ROW. The conditions of the vegetation surrounding PPL's facilities created unsafe conditions for tree removal. PPL is at fault through decades of negligence and unlawful acts of vegetation management practices in and around PPL's alleged ROW that was tangled with live utility wires. PPL employees refused or did not remedy the vegetation problem after seeing it and once being made aware of the conditions by the Complainant.

These three accidents could have been avoided. PPL dispatched employees and subcontractors to Complainants property to resolve these issues. The Complainant has on at least these four dates disclosed by PPL made contact with PPL to resolve this vegetation management issue. PPL employees and subcontractors ignored or denied these four requests to resolve this issue. PPL has not provided an explanation as to why the vegetation was left up to the Complainant to be removed. PPL has not denied the vegetation growth in and around PPL's alleged ROW before, during, or after each incident. PPL has provided evidence and admission that they have put Complainant safety at risk by denying a service request which led to property damages and outages. PPL denied the Complainant's request for help to remove trees in and around PPL's alleged ROW for trees that were tangled with PPL utility poles and wires . PPL and PPL employees deemed the service request made by the Complainant for utility poles and wires to be removed, relocated, dropped, and/or de-energized so that trees can be removed, an unreasonable service request. PPL has also admitted in this section that "PPL lacks the sufficient

knowledge or information as to the precise effects of the service outage for various of its customers due to the actions of the complainant.” This in itself is a violation of the preservation of record under PA Title 52 Chapter 57 Code 57.45. PPL is required by law to record and maintain these records. These are more incomplete and/or missing records. PPL has put the safety of the complainant at risk by violating Pa Title 52 Chapter 15 Section 1501.

6. PPL admitted to the accident on 06/06/23. PPL has stated in its answers that PPL can not conclude whether the Complainant called PPL for its utilities to be dropped and de-energized and removed several times. PPL has also submitted into discovery call center details that were captured in the work order document. (See Appendix 3 PPL work orders) In these documents call center details were recorded on work orders that were disclosed. In these documents there are dates and times where notes were logged. These are not all the logs that exist and discovery is still ongoing, as the Complainant is still seeking data from PPL. The following events are described in the documents provided by PPL. On 03/29/23, the Complainant spoke with a PPL employee from the call center. During this call, the Complainant asked PPL to send a PPL engineer to the Complainants property to evaluate PPL facilities on the property. On that day, the Complainant requested a new service. Also Complainant made this PPL representative aware that a new building was being constructed on the property, and that new construction was taking place at Complainants property. Complainant also asked for pole # 57334N42685 and pole # 57339N46273 and the wires attached to them to be removed, replaced, dropped or de-energized for tree removal. (See Appendix 3 page 32 work orders) There have been other contacts before the accidents but this is the information provided by PPL at this time. This first accident happened on 04/13/23 after PPL employees refused to remove, relocate, drop, and/or de-energize PPL owned facilities or to assist with tree removal in and around PPL alleged ROW for trees tangled with live distribution lines. Following this accident this documentation shows several more contacts. ( See Appendix 3 page 34, 35, 36 & 37 work orders) On 04/23/23, Compliant requested Pole # 57334N42685 and 57339N46273 be removed. On 04/24/23, Complainant again called in informing PPL employees through the call center that tree cutting was being done on the Complainants property and there were trees entangled around wires pole to pole.

Complaint requested assistance with removing these trees. (See Appendix 3 page 34 work orders) Also on 04/24/23, Tom replied to this work order stating “ I explained to the customer that poles can't be moved until customers and street lights are refed.” (See Appendix 3 page 36 work orders) On 04/26/23, Complainant again calls into PPL call center after meeting with a subcontractor on the Complainants property from Environment Contractors Inc. (hereon in ECI) PPL employee from the call center wrote on that date “Caller removing trees needs temporary disconnect, advised someone would reach out within 10 days to review” (See Appendix 3 page 33 work orders) These requests were also denied by PPL employees Tom and PPL employee Daniel Walker. ( hereon in Dan) On 05/25/23, the second accident occurred followed by a third accident on 06/06/23. PPL's admissions and PPL provided documents shows the Complainant gave PPL ample notice of tree removal. At minimum a work order to resolve the vegetation issue should have been made by PPL employees. PPL employees were aware of the work being done in and around PPL's ROW. PPL employees did not follow policy and should have stopped the Complainant from engaging in tree removal in PPL's alleged ROW. The conditions of the vegetation surrounding PPL's facilities created unsafe conditions for tree removal. PPL is at fault through decades of negligence and unlawful acts of vegetation management practices in and around PPL's alleged ROW that was tangled with live utility wires. PPL employees refused or did not remedy the vegetation problem after seeing it and once being made aware of the conditions by the Complainant.

These three accidents could have been avoided. PPL dispatched employees and subcontractors to Complainants property to resolve these issues. The Complainant has on at least these four dates disclosed by PPL made contact with PPL to resolve this vegetation management issue. PPL employees and subcontractors ignored or denied these four requests to resolve this issue. PPL has not provided an explanation as to why the vegetation was left up to the Complainant to be removed. PPL has not denied the vegetation growth in and around PPL's alleged ROW before, during, or after each incident. PPL has provided evidence and admission that they have put Complainant safety at risk by denying a service request which led to property damages and outages. PPL denied the Complainant's request for help to remove trees in and around PPL's alleged ROW for trees that were tangled with PPL utility poles and

wires . PPL and PPL employees deemed the service request made by the Complainant for utility poles and wires to be removed, relocated, dropped, and/or de-energized so that trees can be removed, an unreasonable service request. PPL has also admitted in this section that “PPL lacks the sufficient knowledge or information as to the precise effects of the service outage for various of its customers due to the actions of the complainant.” This in itself is a violation of the preservation of record under PA Title 52 Chapter 57 Code 57.45. PPL is required by law to record and maintain these records. These are more incomplete and/or missing records. PPL has put the safety of the complainant at risk by violating Pa Title 52 Chapter 15 Section 1501.

7. PPL tree cutting policies are clearly defined on its website and through policies PPL has enacted. ( See Appendix 4 PPL vegetation policies) PPL has disclosed work order documents through discovery. In these documents PPL call center employees recorded that tree removal and construction was being done on the Complainants property with the first contact on 03/29/23. ( See Appendix 3 work orders) On 04/24/23, it is recorded that PPL employee Tom has denied this request. ( See Appendix 3 work orders) There is no dispute from PPL of the vegetation in and around the PPL alleged ROW before, during, and after these accidents occurred. ( See Appendix 5 Map of Complainants property) There is no dispute that PPL did not remedy this situation when PPL employees became aware of the vegetation. It is also clear that PPL employees entrusted and deferred the Complainant to handle the vegetation management in PPL’s alleged ROW on his own instead of intervening. Documents show several notes where the Complainant asked PPL for assistance with tree removal. These requests were denied or went unanswered. This has led to three accidents on the Complainants property. Construction on the Complainants property has been at a stand still. PPL has not removed these poles and wires from the Complainants property to safely complete the construction project. With big equipment, the construction of a building, and several poles being located in the Complainants driveway these poles have caused a public safety issue in violation of Pa Title 66 Chapter 15 code 1501. PPL admitted that four poles have no valid ROW easement on the Complainants property. The location of these poles and the pole design has

put the Complainants safety at risk on his property and is prevented day to day construction activities from resuming.

8. PPL has denied being in violation of codes in this section 2 of the Amended Formal Complaint Of Nieves Abad. PPL has not submitted a reason for why they are not in violation of these codes. PPL has not submitted documentary evidence to the contrary of being in violation of these codes. PPL has not met the burden of proof needed to sustain its denials.

9. PPL has admitted to reusing pole identification numbers for pole #'s 57327N46297 and 57334N42685 after these poles were replaced on 04/13/23. (See PPL Answers To The Amended Formal Complaint Of Nieves Abad Paragraph 9) PPL has submitted documentation into discovery related to the data it maintains for both of these utility poles. (See Appendix 6 utility pole data) On this document many sections are left blank. All utility pole locations are left blank. This incomplete record is another PPL failure as an EDC operating in the State Of PA in violation of Pa title 66 Section 17 Code 1702. "The commission may require any public utility to establish, provide, and maintain as a part of its system of accounts, continuing property records, including a list or inventory of all the units of tangible property used or useful in the public service, showing the current location of such property units by definite reference to the specific land parcels upon which such units are located or stored." and Pa Title 66 Chapter 17 Code 1704(A) **(a) "General rule.--**Every public utility shall keep such books, accounts, papers, records, and memoranda, as shall be required by the commission, in an office within this Commonwealth, and shall not remove the same, or any of them, from this Commonwealth, except upon such terms and conditions as may be prescribed by the commission."PPL and PPL employees have denied any other information exists for these utility poles. This data does not show the poles were replaced on 04/13/23 when the first accident occurred. Pa requires an EDC to collect and maintain certain information about a utility pole. Maintaining this information is required under Pa Title 52 Chapter 57 Code 57.45.

**§ 57.45. Preservation of records.**

Each electric utility shall keep and preserve its records in conformity with the provisions applicable to it in the most recent publication of the National Association of Regulatory Utility Commissioners, entitled "Regulations to Govern the Preservation of Records of Electric Gas and Water Utilities"

The most recent publication of the National Association of Regulatory Utility Commissioners entitled "Regulations to Govern the Preservation of Records of Electric Gas and Water Utilities Revised October 2007 states the utility pole history must be "maintained for the life of the equipment" (See NARUC 2007 Preservation Of Records 23(P) ) PPL's inaccurate and incomplete record keeping of its utility pole history in this complaint is not in accordance with the recent publication of NARUC as required under PA Title 52 Chapter 57 Code 57.45. (See Appendix 6 Utility Pole data) Records are required to ensure public safety under this section. PPL has admitted to reusing pole identification numbers after installing a new utility pole instead of creating a new pole number. At minimum if PPL was to use the old pole identification number for a new pole. Certain records must be kept to identify and record information about the new utility pole. Pa Law requires certain information about a new utility pole to be recorded. The new utility pole should include the utility structure identification number, structure material type, structure installation date, utility pole owner, utility pole location, installer, height, reinforcing dates, treatment, inspections, maintenance, and updates. This information can be seen recorded on each of the structure reports in Appendix 6. When a new pole is installed this same data is not recorded. Pa Title 52 Chapter 57 Code 57.46 requires a continuous property record. Pa Title 52 Chapter 57 Section 57. 45 requires these records to be recorded and retained. The period of retention has not expired. NARUC requires these records to be recorded and retained for the life of a utility pole. After a utility pole is retired, a new number should be issued to the new utility pole in order to accurately record this information. No record is kept of the previous utility pole to show the date of retirement. ( See Appendix 6 page 46, 47, 48, 58, 58 & 60) These records indicate pole # 57334N42685 was installed on 05/15/1998. These records do not show or indicate anywhere that this pole was replaced on 04/13/23. This happened after the first accident on the Complainants property. These records do not show any of the

required information that is provided for the original pole. This happens when PPL uses an identification number from a previous pole. Utility pole number 57327N42697 indicates this pole was installed on 01/15/1933 There is also a pole transfer date that occurred on 04/08/1970. Records of the second pole replacement in 1970, have not been recorded or retained. This pole was also replaced a third time on 04/13/23. The records do not show the pole was replaced on this day. No other information required to be recorded for the new utility pole was retained. Since this information from the new pole has not been recorded properly by PPL. These utility poles have put the Complainants and the public's safety at risk. Maintaining data on utility poles is just as important as conduction routine maintenance and inspections. ( See PA Bulletin Volume 33 Issue 49 33 PA B 5923 Electric and Gas Utility Records Retention) Here legislation holds EDC's to a standard when implementing rules for record keeping to maintain public safety and service reliability. PPL is in violation of Pa Title 66 Chapter 15 Code 1501 by causing a public safety hazard through improper record keeping of its facilities in this complaint.

10. PPL has admitted the Complainant requested that PPL owned facilities be relocated. ( See Answers To The Amended Formal Complaint Of Nieves Abad) PPL has also submitted into discovery work order documents where several remarks were captured by PPL employees ( See Appendix 3 page 36 works orders) It was recorded on work order 58719831 that PPL employees Tom and Dan both deny requests to remove utility poles and wires until a billing issue was resolved. Complainant contacted PPL's office of general counsel. (hereon in OGC) On 06/27/23, OGC, responded to the work order by directing PPL employees to waive utility pole relocation costs. On 11/19/23, Tom wrote "customer still did not pay for damages." On 01/04/24, Complainant, spoke with PPL employee Loriann Morell ( hereon in Loriann) to request information on pole relocation. On 02/02/24, Complainant, spoke with PPL representative Loriann who confirmed MCS billing costs was waived by OGC, the representative Loriann and the Complainant confirmed trees were cut, and the field request were sent to release the hold so utility poles could be removed. Later the same day, on 02/02/24, an email was sent from Loriann to Tom asking him to remove the SPC as the notes under MCD billing shows the cost was waived per OGC. ( See Appendix 3 page 36 & 37 work orders) A few days later PPL employee Judith A Suhr writes " Customer keeps

calling, but he needs to pay the invoice because he ripped down our power lines twice. He needs to pay to BJO's 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 the customer pays for BJO's." Tom and Dan are responsible for stopping the removal, relocation, dropping, and/or de-energizing of utility poles and wires throughout this process. This caused all 3 accidents and a safety concern to this day. This is just a few admission that we have in the documents provided by PPL thus far, as discovery is still pending. There have been dozens of encounters with Tom, Dan, and other PPL employees that have not been disclosed by PPL. PPL denied "The improperly demanded that the Complainant pay the cost of relocation" PPL also admits that by charging these invoices " It is denied that PPL electric improperly rendered invoices to the Complainant as a result of the Complainant damaging the companies facilities and that PPL electric is violating its Commission - approved tariff when requesting monies relating to the damage that the Complainant caused or effectuated to the company's facilities." ( See PPL's Answers To The Amended Formal Complaint Of Nieves Abad) PPL has admitted to charging the Complainant billing numbers 91130032-3 and 91130033-3 for damages done during tree removal. PPL now admits to using these charges to stop pole removal or relocation on the Complainants property. This is not in accordance with PPL own rules in PPL Electric Utilities Corporation Rules For Electrical Service Rule 4- Supply Of Service

**PPL RULE 4 (I) RELOCATION OF FACILITIES** (2) The relocation of Company facilities, when done at the request of others, is at the applicant's expense and payment of the Company's estimated cost of the relocation is required in advance of construction. When the request is from an affected property owner and the facilities are on the (C) customer's property, the charges for relocation of distribution system facilities are limited to estimated contractor costs, estimated direct labor and estimated material costs, less an amount equal to any estimated maintenance expense avoided as a result of the relocation.

Fees to remove these poles have already been waived by PPL's OGC department on 6/27/23. OGC wrote a statement in the work order to waive all fee and cost to the complainant. ( See Appendix 3 page 35 & 37 work orders) PPL's approved tariffs under Pa Title 52 Chapter 57 Section 57.27 clearly

defines only three costs that can be charged to the Complainant. 1. Contractor costs. 2. Direct labor cost. 3. Direct material cost.

**§ 57.27. Pole removal or relocation charges.**

(a) *Definitions.* The following words and terms, when used in this section, have the following meanings unless the context clearly indicates otherwise:

*Contractor costs*—The amount paid by a public utility to a contractor for work performed on a pole removal or relocation.

*Direct labor costs*—The pay and expenses of public utility employees directly attributable to work performed on pole removals or relocations, but does not include construction overheads or payroll taxes, workmen's compensation expenses or similar expenses.

*Direct material costs*—The purchase price of materials used in performing a pole removal or relocation, but does not include related stores expenses. In computing direct material costs, proper allowance should be made for unused materials, materials recovered from temporary structures, and for discounts allowed and realized in the purchase of materials.

*Pole removal or relocation*—The removal or relocation of distribution line poles and their associated attachments made under the request of a residential property owner who is not entitled to receive condemnation damages to cover the cost of the pole removal or relocation. The term does not include pole repairs or replacements necessitated by the intentional or negligent conduct of a party.

(b) *Tariff provisions.* A public utility shall file as part of its tariff provisions setting forth its method of determining pole removal or relocation charges.

(c) *Charges.* Pole removal or relocation charges shall be limited to the contractor, direct labor and direct material costs associated with the pole removal or relocation less an amount equal to maintenance expenses avoided as a result of the pole removal or relocation.

Here the legislatures go into detail of what charges can be charged to the complainant for pole removal or relocation. This section of the law does not say that The Complainant can be charged for tree damage or any other prior billing event in order to remove utility poles. Billing issues should be handled through the proper channels. Such as collection, credit reporting agencies, and the Court Of Common

Pleas. Further in this section under 57.27(A) this section has a definition section which clearly defines the cost PPL can charge a tariff to the Complainant. With this admission by PPL, the documentary evidence provided by PPL, and PA State Law. Pole #s 57339N46273 & 57334N42685 should be moved or relocated immediately. All utility poles without a ROW Easement and PPL does not retain or has incomplete records should be removed as a public safety risk. PPL has already agreed to relocate these two poles. The documents that PPL have provided show PPL's OGC department has directed that all costs be waived for these two utility poles or any billing hold lifted. PPL employees Tom and Dan have refused to put a work order in to complete the pole relocation until a billing issue was resolved. This is not in accordance with the commission's approved Tariff. PPL's burden of proof that it is not in violation of the PUC approved tariff is not supported by the evidence provided and the admissions made by PPL.

11. PPL has admitted that there are more utility wires on the utility poles in this Complaint since 2007. ( See Answers To The Amended Formal Complaint Of Nieves Abad Paragraph 11) "It is denied that the number of attachments on the referenced pole has exactly tripled since 2007." Though not admitting utility wires "Exactly tripling" this is an admission to an increase of utility wires on the utility poles in this Complaint. This increase in usage of public space from 2007 to the present date has caused a public safety risk. Complainant incorporates section 11 of The Amended Formal Complaint Of Nieves Abad pertaining to the safety of the pole design. PPL denies the utility poles to have less than  $\frac{2}{3}$  of the original structure remaining. During a high wind storm that impacted the area surrounding the Complainant's property on 03/16/25 several utility poles snapped. Some of these poles snapped due to branches or tree hitting the utility wires. The Complainant recorded at least three poles that snapped due to high winds alone causing live ppl owned utility wires to fall to the ground. This will continue to happen and eventually cause harm or death. This is just one area, this has occurred throughout PA. These type of events may have already caused harm or death but the complainant lacks the statistics to present the evidence. Waiting for utility poles to break instead of replacing outdated equipment is unacceptable. In the early 2000's several pieces of legislation was brought forth by the PA General Assembly. This legislation was put in place to protect the safety of the public and ensure safe, reliable electric service to

the residents of PA. Allowing EDC's to maintain facilities that are out of date has become acceptable. PPL had approximately 25 years to bring their entire network up to date since legislation has been passed. A quarter of a century later, PPL has not updated its entire network. PPL has a requirement as an EDC operating in the State Of PA to have all of its facilities up to date. If PPL cannot maintain their equipment, PPL should allow smaller companies or a new company that can maintain this equipment to replace them. The citizens of PA should not have to lower their standards and put their safety at risk to accommodate PPL. PPL is a billion dollar company that profits every year. Making a profit from the people of PA, while putting the public at risk is not in accordance with PA State Law. A quarter of a century should have been adequate time to allow PPL to update its outdated facilities. Facilities which should have been maintained up to standard continuously since the facilities were put in place.

12. Relief requested in section 12 Of The Amended Formal Complaint Of Nieves Abad in full. This is based on the admissions of PPL and documentations that PPL has submitted. PPL has failed to present one documentation as evidence in PPL's Answers or New Matter. PPL has not stated a law or code in this brief to contradict any accusations made in the Amended Formal Complaint Of Nieves Abad.

#### **New Matter**

1. On February 20, 2025, PPL submitted an Answer To The Amended Formal Complaint Of Nieves Abad and New Matter. In section 1 of PPL's New Matter PPL Incorporates Their Answers To The Amended Formal Complaint Of Nieves Abad sections 1-12 into the new matter. PPL's Answers To The Amended Formal Complaint Of Nieves Abad required the response above in sections 1-12. Complainant incorporates numbers 1-12 of the Amended Formal Complaint Of Nieves Abad and section 1-12 above in the Reply To PPL's Answer To The Amended Formal Complaint Of Nieves Abad into the New Matter.

Complainant also responds as follows:

2. The Complainant adds PPL utility pole #'s 57323N46307, 57328N46314, 57335N46309, 57344N46304, 57355N46297, 57365N46292, 57342N46312, 57341N46321, 57335N46325, Unknown pole located on the corner of Green St and Sanderson ave in Scranton Pa 18509. PPL has submitted in its answers to the Amended Formal Complaint Of Nieves Abad to owning the above poles. PPL has

admitted these poles to be located on Green Place and Amity Court in Scranton Pa 18509. These streets and roads are used to access the Complainants property by the Complainant and the public on a daily basis.

**PPL's Sections 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, and 15 Complainants Standing:**

Complainant does not dispute these utility companies rights under Pa title 52 chapter 77 section 77.1-77.7. Each individual utility company currently occupying a space is not the issue in this complaint. Nor does the complaint know of or seek a violation that the PUC has jurisdiction against an individual utility company. The problem stems from the past to present conditions of PPL owned utility poles and wires. PPL's outdated pole design is not equipped to handle the modern needs for utility wires to safely connect too. Since 2007 utility pole space being occupied on PPL owned utility poles have multiplied. This has caused a strain on the already degenerating PPL utility poles. This outdated utility pole design makes the utility pole and wire conditions on Green Place and Amity Court unsafe. PPL has the duty to deny pole space on a non discriminatory basis where there is insufficient capacity and causes a safety threat to the public. The Complainant, his family, and the public use these roads between the hours of 8:00 am and 8:00 pm to access the Complainants property. Complainant is a customer of PPL and has electric service on the Complainants property. The Complainant is a citizen of PA and owns several properties in PA. PPL has knowledge of the old and deteriorating conditions of these utility poles in this complaint. No work order or corrective action has been created by PPL or PPL employees to correct utilities in this complaint. PPL still grants access to utility companies, adding more utility wires to PPL owned utility poles. The load being placed on these degenerated poles caused stress factors and the utility poles to lean from overbearing weight. PPL has allowed access to many additional utility wires without updating to a modern pole design. This has caused utility wires to completely block access and ways of egress to the second story windows of the houses along Green Place and Amity Court. Some houses are blocked on two sides. This has caused a loss of egress to two sides of the second story

windows of their residents. Complainant is affected by this flawed utility pole design. These utility poles and wires go through Complainants property, neighboring properties, and roads that access the Complainants property.( See Appendix 5 Map of Complainants property) These utility poles and wires are in and around the only roads for first responders to access Complainants property. By failing to detect and correct the problems of the current utility pole and wire design. It has jeopardized the safety of the Complainant, his family, and the public on a day to day basis. If emergency responders would need to respond to a fire, an emergency, or require emergency equipment such as a fire truck to get to the Complainant. The PPL owned utility poles, wires, and current pole design would impede or delay response times to get to the Complainant. These blocks are not full roads, they are courts and places. These smaller one car roads make it difficult to navigate, with the additional flawed utility pole and wire designs, this system poses a threat to public safety. A visual inspection of this pole design would reveal the many safety transgressions. PPL is currently not in compliance with Pa Title 52 Chapter 77 Section 77.4(A), Federal Communications Act 47U.S.C section 224(f)(2), 47 CFR, Chapter 7 Subpart J 1.1403(A),(B) and PPL's owned utilities pole attachment standards. These sections of State and Federal Law leave it in the hands of the electrical company to determine the safety of adding each additional utility wire to PPL owned utility poles. PPL has failed in its duties to maintain safe and reasonable service to the public. The current utility pole and wire design can not sustain the current growth of utility wires on PPL owned utility poles in this Complaint. This has led to a public safety issue and has put the Complainant at risk of injury. All companies should have access to these utility poles. It is PPL's duty to ensure that this is done safely and properly to accommodate new utility company wires. PPLs current pole design in this Complaint is not in compliance with Pa Title 66 Chapter 15 Code 1501.

These are not the only poles in Scranton PA or on the route back and forth from Complainants residence in Forest City PA 18421 that are not in compliance with the state's vegetation management or utility poles standards. It is beyond the means of the Complainant to

report and make a complaint about each utility pole not in compliance with PA State Codes. The Complainants will make the PUC aware of the conditions so that other accidents could be prevented in the future. The Complainant is asking the PUC to step in and enforce PA Laws to ensure that PPL's facilities are up to standards so the complainant and the public are protected. Recently On 03/16/25, a high wind storm hit areas of PA including the Complainants property. At Least three utility poles broke in the Complainants area just due to high winds. Dozens of other utility poles broke in the area due to branches hitting the power lines. Utility poles were made to withstand the wind that took place on this day as it was a storm force wind not hurricane force winds. Branches hitting power lines should not cause utility poles to snap either. Utility pole standards are required to be developed by the American National Standards Institute. ( hereon in ANSI) Utility poles that are less than 2/3 of its original service strength require replacement. The storm that took place on this date was recorded by the media and social media. The Complainant also took pictures and video of the three poles that were broken by the wind. This will continue to happen until PPL is held accountable for its utility pole standards.

**PPL's Sections 16, 17, 18, 19, and 20 Title 66 Chapter 33 Code 3314**

The Complainant is seeking relief taken against PPL for its actions and inactions from March of 2023 to the present time. In Particular the actions and inactions that led up to and caused the 04/13/23, 05/25/23, and 06/06/23 accidents. The Complainant has not seeked relief from the PUC against PPL for any prior incidents, nor does he intend to.

**CONCLUSION**

PPL has said after a reasonable investigation PPL can not conclude whether the Complainant asked PPL to remove, relocate, drop, and/or de-energize utility poles and wires in this complaint. Documents provided by PPL in Appendix 3 reveal several occasions where the Complainant spoke with PPL employees about the PPL owned utilities on the Complainants property. PPL has provided these documents to the Complainant and are aware of these documents. On these documents there is a date and time stamp indicating dates where PPL was contacted by the Complainant before the accidents occurred.

Together with this information and other PPL admissions in PPL's Answers To The Amended Formal Complaint Of Nieves Abad, PPL has not met the burden of proof to sustain a denial.

PPL has admitted to charging the Complainant a tariff for pole removal. PPL's OGC department has set instructions waving the cost of this tariff for pole relocation. The PPL OGC department has instructed PPL employees to lift billing holds that stopped pole relocation. PPL has admitted to charging a second tariff to the Complainant for two unpaid billing invoices #'s 91130032-3 and 91130033-3. PPL has improperly charged Complainant a second tariff that is outside the PUC allowable tariffs for pole relocation. PPL has denied these tariffs are improper "Further it is denied that PPL Electric improperly rendered invoices to the Complainant as a result of the Complainant damaging the Company's facilities and that PPL Electric is violating its Commission-approved Tariff when requested monies relating to the damage that the Complainant caused or effectuated to the Company's facilities." With this admission by PPL in the Answers to The Amended Formal Complaint Of Nieves Abad, the documents in this appendix, and Pa State Law. PPL does not meet the burden of proof needed to sustain a denial of an illegal tariff.

Through PPL's Answers To The Amended Formal Complaint Of Nieves Abad they have admitted to being in violation of Title 52 Chapter 57 Code 57.45, Title 52 Chapter 57 Code 57.198(A)-(N), NARUC, Regulations To Govern The Preservation Of Records Of Electric, Gas, and Water Utilities Revised October 2007 Section 23(P). PPL has admitted " Pole 57316N46296 does not exist in PPL electronics system." This Includes a valid ROW easement. PPL has admitted previously to not having a valid ROW easement for pole numbers 57334N42685, 57339N46273, and 57327N46297, in PPL's Original Answer To The Original Formal Complaint Of Nieves Abad. PPL has now admitted to not having "Call center" details in this record. PPL has also admitted to not retaining customer information and any data for outage duration as a result of the three accidents that took place on the Complainants property involving PPL facilities for all three accidents in this complaint. (See PPL Answers To The Amended Formal Complaint Of Nieves Abad) This is inconsistent with the standards set forth in Pa Title 52 Chapter 57 Code 57.45, Title 52 Chapter 57 Code 57.198(A)-(N), NARUC, Regulations To Govern The Preservation Of Records Of Electric, Gas, And Water Utilities Revised October 2007 and 6(B6). The

State Of Pa does not give an EDC operating in its jurisdiction the choice of which records it records and retains. PA State Law compels PPL to record and retain this information for a specific period of time. An Informal Complaint was started on January 8, 2024 putting this Complaint into litigation. All records for this incident are required by State law to be collected and retained for matters in this Complaint. The time limits for retaining these records have not passed. With the admissions made by PPL they have not met the burden of proof to sustain a denial.

PPL has “Denied that the number of attachments on the referenced poles has exactly “tripled” since 2007” Even though has denied the wires “tripling” this statement is an admission of an increase of utility wires on PPL owned utility poles. This increase has caused a public safety risk. The Complainant has proven standing in the Amended Formal Complaint Of Nieves Abad and in The Reply To The Answers Of PPL To The Amended Formal Complaint Of Nieves Abad. The Complainant is a resident of PA with a PA drivers license. The Complainant is the land owner at 837 Rear Capouse Ave Scranton Pa 18509. The Complainant has service with PPL and is a PPL customer. Complainants, his family, and members of the public use Amity Court and Green Place on a daily basis to access the Complainants property. (See Appendix 5 map of complainants property) The utilities in this complaint have been admitted to be located on these roads and owned by PPL. Utility poles and wires in this complaint have put the Complainants safety at risk and caused a public safety concern for the allegations alleged in the Amended Formal Complaint. PPL is the cause of the problem through its facilities in this Complaint. PPL will not remedy the problem.

Complainant has asked for relief for three accidents on the Complainants property on 04/13/23, 05/25/23, and 06/06/23. Complainant also is holding PPL accountable for safety infractions from March 2023 to the present time. The prior actions and inactions have resulted in the accidents that occurred and cause a public safety threat to the present day. All new poles in this Complaint are in the same condition as the original poles in the Original Formal Complaint Of Nieves Abad. PPL has not remedied this problem. PPL did not present any documentary evidence or law to sustain the denials. The Amended Formal Complaint Of Nieves Abad should be granted in full, striking PPL’s inaccuracies, and recording

all admissions made by PPL. All relief requested in the Amended Formal Complaint Of Nieves Abad should be granted in full.

**Wherefore, The Complainant, Nieves Abad, respectfully requests that the Commission grant the Amended Formal Complaint in full, striking or denying PPL's incorrect answers, and/or to grant to the Complainant any other relief as is just and reasonable under the circumstances**

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Dated-March 31, 2025

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Appendix I

PPL 57334

N42685





Appendix D

P. P. & L. CO.  
57316  
N46296





12952782  
Legacy Work Order: 58719830  
ER Number: 469220-CCN  
Project: B62023

Record View	Requisitions	Comments	Facts	Cost Summary	Addresses	Activities	Documents	Children	Checklist	Book Labor	Estimate Status	POC Email	More

12952782 - 140 TX METER TEMP ...  
 loc. adv had the 6-8 weeks, few requirements. BUILDING TYPE: SHOP/STORE. CALLER NAME: NIEVES ABAD. CUSTOMER TYPE: CORPORATION/CLF. svr NIEVES ABAD. Caller Nieves Abad requesting temporary serv. CUSTOMER DESIRED IN-SERVICE DATE 05/12/2023. NEW APP SIZE: 200A. NATURE OF JOB: TEMPORARY CONSTRUCT APP-CAND-CENTRAL APPLIANCE/ELEC WATER HEATER, AIR COND-BTU-10000. ELECTRIC-HEAT-TYPE-BASEBOARD. SQUARE FOOT-BUILD-4000. CONSTR-PROG-VACANT LOT. DISTRIBUTION-HOLELESS THAN 100 FEET. SEND-PAYE-CONFIRMAN. PREFERRED-LOCAT-P-POLE

469220-CCN

svr nieves should have had info regarding cost for work  
 svr Nieves Abad - there appears to be 3 work orders for same work item. 2 old hrs - 58719830 and 58705655 and one new hr with 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 rebox under the original w/o 58719830 and we will match them up. expect to cut that it would take 6-8 weeks for any work once we see the inspection.  
 Spoke with Nieves Abad. Adv we did not inspection as of Friday 05/11, but there is no date scheduled yet. explained that I cannot schedule for him, but once call was made 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 job yet.

NIEVES ABAD called in re: scheduled job completion date, adv it's scheduled to be completed this week, he mentioned he asking that he be contacted when crew is dispatched, email sent to W/O & scheduled for the area.  
 spoke with Nieves 05/15/23, 2348 confirmed week of 05/18/23

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

svr Nieves Abad, informed customer, the week of 05/23 weather permitted.

NOTE: CSS acct 68413-0009, unable to complete B&C at this time

Appendix 3  
page 3a

Created: 04/24/2023 09:17  
 Created: 09/22/2023 10:19  
 Created: 08/11/2023 15:07  
 Created: 09/14/2023 12:49  
 Created: 09/18/2023 10:57  
 Created: 09/19/2023 14:46  
 Created: 09/22/2023 14:08  
 Created: 09/26/2023 14:08  
 Created: 10/20/2023 09:57

Work Order: 12953771 - NIEVES ABAD

12953771 - NIEVES ABAD

Legacy Work Order: 59720303  
ER Number: 321904-CCN  
Project:



Record View

Requisitions

COMMENTS

Parts

Cost Summary

Addresses

Activate

Documents

Criteria

Checklist

Book Labor

Materials Status

INCS Billing

Time

Documents (0)

Created: 04/26/2023 21:43  
USER: NIEVES, ABAD (PVA53004)

Created: 04/27/2023 03:25  
USER: NIEVES, ABAD (PVA53004)

Callers removing rates, needs temp disconnect. advised s: omaha's would reach out within 10 days to re-verify.: SEND RATE-CONFIRM-N: DESIGNER-NOTIFICATION; DESIGNER-CONTACT; TEMP-DISCONNECT-20230503

321904-CCN

page 33

12947578 - ABAD 40 TX METER ...  
Logseq Work Order: 58716671  
ER Number: 249220-ENM  
Project: 881473

Record View Requisitions **Contract** Parts Cost Summary Addresses Activities Documents Children Checklist Book Labor Materials Status L/Cs Billing Menu

249220-ENM  
Customer: 03/29/2023 11:33  
Created: 03/29/2023 00:24  
Created By: [Name]  
Created By: [Name]

meter and service call. 400 amp, provided lead time, 60 week. CUSTOMER DESIRED IN-SERVICE DATE 04/19/2023; a case to address 837 CAPPOUSE AVE Swanton, PA 16508, req. CALLER NAME: MIEVES ABAD, sr  
MIEVES ABAD, Caller Mueva Abad requesting new commercial NEW/AMP SIZE 400A CUSTOMER TYPE: RENTER (BUSINESS); and lot, would like engineer to come out at location, BUILDING TYPE: SHOP/STORFRG, I  
NATURE-OF-JOB: NEW PERMANENT METHOD-OVERHEAD AIR COND-CENTRAL APPLIANCES/HOME AIR COND-SPLIT-15000; SQUARE-FOOT-BUILD-8000; CONSTR-PROG-VACANT LOT; DIST-NEAREST-POLE-  
LESS THAN 100 FEET; SEND-RATE-COMPROMISE; PREFERRED-LOCATE: D - RIGHT REAR

Spider with Mueva Abad Property is vacant lot still. Caller is working on clearing area and states that there are a few trees that are highlighted around when job to pdf. Requiring assistance in removing those  
trees/brushing so he can remove them. Please contact customer to discuss. Sent email to Muevas; Followup.  
Caller does not have a bill access for this property yet, but does have multiple work orders.  
WOS: 58719031, 58718930, 58716671, 58716666.

STILL WAITING ON PAYMENT FOR PROPERTY DAMAGE

[Home](#)
[Search](#)
[Add](#)
[Print](#)
[Refresh](#)
[Back](#)
[Forward](#)

[24](#)
[58716658](#)

[Record View](#)
[Requisitions](#)
[Comments](#)
[Pids](#)
[Cost Summary](#)
[Addresses](#)
[Activities](#)
[Occurrences](#)
[Children](#)
[Checkers](#)
[Book Ltrcr](#)
[Materials Status](#)
[EICS Billing](#)
[More](#)

12947575 - ABAD 40 TX 400A ME...  
 agency Work Order: 58716658  
 ER Number: 240220-EMM  
 Project:

[240220-002](#)  
[240220-EMM](#)

ed from property pole #5734N42605. do not have an sec call. News Abad has vacant lot wants PPL pole remove o pole is 437 Reser Capouse Ave Scranton Pa 18505. want cania pole 5734N42605 removed closed address is: SEND RATE CONFIRM-N  
 Created: 03/29/2023 21:47  
 Created: 03/29/2023 02:50  
 Created: 04/03/2023 11:51  
 Created: 04/11/2024 07:37

STILL WAITING ON PAYMENT FOR PROPERTY DAMAGE

2952893 - OH POLE AND SECO...  
Agency Work Order 58719531  
ER Number 289122-EAM  
Project B81001

Record View	Requisitions	Comments	Parts	Cost Summary	Addresses	Activities	Documents	Children	Checklist	Scott Lator	Materials Status	WCS Billing	Notes

m POLE # 57334M2315 and 57335M2775 as its on the prop, entry in the driveway, caller Nieves Abad requesting poles & wires removed from: SEND-RATE-CONFIRM-N

**I EXPLAINED TO CUSTOMER THAT POLES CAN NOT BE MOVED UNTIL CUSTOMERS AND STREETLIGHT IS RELOC. SEE WWO 12982895 TO RIGHT OF WAY**

289122-EAM

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 he becomes necessary he will establish the matter to the office of general counsel

Caller NIEVES ABAD 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 # 618-774-5157

**RELOCATION COST WAIVED BY DGC**

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

**Customer will not pay for damages**

SPW Nieves Abad was contacted to know about the costs regarding the relocation of the poles and the name and number of the engineer, provided information

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Legacy Work Order: 58719831  
 ER Number: 20912ZEMH  
 Project: BE0031

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

Received a response from Dan Walker he advised that both and Tom were both aware of Mr. Abad's position and that Mr. Abad was also made aware of PFL's Position. When and if the criteria necessary he will schedule the have to pay to have them relocated. Established word email ROYV department and provided OGC #, sent email ROYV agent Dan Walker and CC design tech Thomas Kemroschak.

Caller NIEVES ASAD requested legal department to send us paperwork to have poles removed for Right of Way, provided Office of General Counsel tel # 610-774-5057

RELOCATION COST WAIVED BY OGC

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

Customer still has not paid for damages

SPW 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

SPW Nieves Abad who wanted to know the status of the W/O for the notes under NICS Billing the cost is waived per OGC. The ROYV was still holding and with FSY Caller stated that there was already out. Sent Field Request NIE to ROYV to release the hold as well as scheduling regarding the waiver of the cost.

Enabled Tom Kemroschak to remove the SPC as the notes under NICS Billing show the cost was waived per OGC

Customer keeps calling but he needs to pay the invoice because he signed down our lines twice. He needs to pay 2 BIDs that he also will not sign ROYV until we say that he doesn't have to pay anything. Dan and Tom are aware. Tom will remove SPC when customer pays for BIDs.

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Created: 08/19/2023 11:51  
 Created: 08/21/2023 09:47  
 Created: 08/27/2023 11:29  
 Created: 08/19/2023 08:50  
 Created: 01/04/2024 15:48  
 Created: 02/02/2024 11:54  
 Created: 02/02/2024 12:14  
 Created: 02/02/2024 03:40



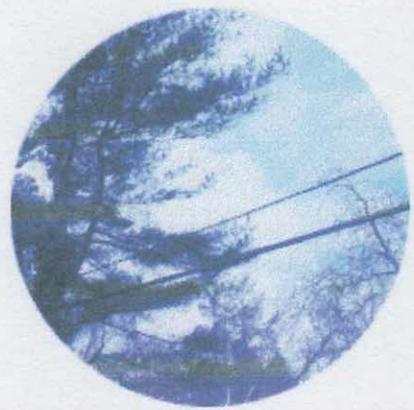
# Safety and Planting Near Power Lines

## HOW TO TRIM TREES SAFELY

### Safely trimming trees



Don't try to prune or remove trees near power lines. Contact with a power line can cause serious injury or death. Electricity can "flash over" if someone gets too close.



Our qualified line clearance tree trimmers have specialized training to work around our power lines. If you want to remove a tree growing within 10 feet of a power line, call us first. One of our tree trimmers will prune to tree to a safe working distance.



We don't prune or remove trees around the service wire between your house and the utility pole. But we'll be happy to de-energize the wire and lower it to the ground for you at no cost. Please call [1-800-342-5775](tel:1-800-342-5775) at least 5 business days before your work. Additional time may be needed to schedule a crew.

### Planting near power lines



Reliability improves significantly by reducing tree-related outages. Through our comprehensive line clearing program, we're determined to reduce the number of power outages for everyone.



We strive to remove hazard trees – those trees outside of the right of way that pose a threat of falling and damaging a power line. These trees are removed with permission of the property owner. Property owners who decline to remove hazard trees may be liable for costs if an identified hazard tree is that not removed subsequently damages a power line.



The distribution system delivers power directly to homes and businesses. The goal is to create a large buffer between our lines and nearby trees and eliminate more potential outage threats. In some cases, crews may need to remove all vegetation under and above a power line. [Read more](#)



The transmission system transports high-voltage electricity over long distances. The vegetation work we do depends on the voltage of the line as well as the specific rights we have for each property. [Read more](#)

## Herbicide Use

### Why does PPL Electric Utilities use herbicides?

Herbicide use is an important part of our program to keep your electric service reliable.

- Safe and effective.
- Approved by the federal Environmental Protection Agency.
- Minimize physical impact on right of way.
- Applied selectively to preserve compatible species.
- Applied by certified contractors working on the ground.

Stay Connected



# Keeping Power Lines Clear

## Why we cut trees along power lines:

- Trees too close to power lines are a major cause of outages for customers.
- Vegetation management work is required so we can keep the lights on for homes and businesses throughout the region.
- It is critical that we maintain the reliability of our electric system.
- We understand this work can cause concern for some individual landowners, and we are sensitive to that. But our first priority has to be reliable electric service for all of the people served by that power line, and for millions of other people in this region.
- Our increased vegetation management activity is already paying dividends for customers in terms of improving reliability.
- We are always willing to meet with property owners to hear their concerns and discuss the work we need to do to keep our lines safe and reliable.

## Overview of Electric Grid Vegetation Work

PPL Electric Utilities operates about 32,400 miles of overhead power lines in its 29-county service territory in central and eastern Pennsylvania. These lines fall into several main voltage classes:

- 230-kilovolt and 500-kilovolt transmission lines – 1,351 miles
- 115-kilovolt and 138-kilovolt transmission lines – 299 miles
- 69-kilovolt transmission lines – 2,750 miles
- 12-kilovolt local distribution lines – 28,000 miles

**Vegetation removal along our transmission lines is complete.** The benefits of this work were demonstrated during Hurricane Sandy, when there were no tree-related outages on the 1,650 miles of high-voltage transmission lines where tree work had been done previously. Going forward, PPL will be maintaining these rights of way in their current condition. Likewise, no transmission outages were reported during the Blizzard of 2016.

**Along local distribution lines, we have stepped up the amount of tree trimming and removal.** These are the lines that deliver power from neighborhood substations to homes and businesses. They run along streets in cities, towns and neighborhoods.

We have increased the scope of vegetation management along these lines, especially those serving larger numbers of customers. In some locations, this work means clearing all vegetation in the right of way, including anything under or around these lines.

**Most customers appreciate the value of tree cutting work.** Our periodic customer surveys show that the vast majority of customers – 9 out of 10 – appreciate vegetation management work and recognize that it will improve their reliability.

## Hazard Trees

These are trees just outside our rights of way that might be leaning, diseased, or otherwise pose a potential threat to a power line if they fell. In cases where we want to remove a danger tree, we will do so if our right-of-way agreement permits, or contact the property owner for permission if we do not have danger-tree rights. If a customer refuses and such a tree damages our lines, that customer may be liable for damage costs.

## Questions & Answers about Vegetation Maintenance

### What is the notification process for work on distribution lines?

Before we begin work, our contractors will canvass the areas where we'll be working to explain what will occur. If no one is home, we will leave a door hanger and a vegetation management brochure. Customers always can call us with questions. Contact information is provided on the door hanger.

### Why remove trees? Can't you just trim the branches instead?

We recognize that some property owners may not want the trees removed under or near power lines. But we know that all customers want reliable electric service. We have to think of the millions of people served by the electric grid, and do the right thing to keep their lights on.

We try very hard to strike a careful balance – improving reliability for customers by keeping trees away from power lines while at the same time being sensitive to landowner concerns about vegetation management.

### Why do you trim some trees that look like they are not even close to touching your lines?

When electric use is high, power lines significantly sag because of the large amount of current flowing through them. Also, windy conditions can cause trees to sway and wires to swing out and touch trees that are too close to the sides of the lines. We have to take the maximum sag and the swinging of lines in the wind into account when determining whether there is adequate clearance between the wires and the vegetation. We also have to consider the fact that trees can grow closer to lines every year.



PPL Electric Utilities

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# Distribution Line Vegetation Management

Working to improve the reliability of your electric service.

## Our program

PPL Electric Utilities operates about 28,000 miles of aerial distribution lines that deliver power from local substations directly to homes and businesses.

Since trees are a common cause of power outages, vegetation management is a critical part of providing safe, reliable electric service. If left unmanaged, some vegetation can grow too close to our lines and cause outages or other unsafe conditions.

Tree-related outages can potentially affect thousands of customers for extended periods of time.

We've expanded the scope of our vegetation management because our experience showed more needs to be done to help guard against tree-related outages, especially during storms.

This means we are trimming more than we have in the past and removing trees when necessary. We understand this approach is not always popular, but it is the right thing to do to keep the system safe and reliable for all.

To manage vegetation, our professional foresters work directly with qualified tree contractors who perform the actual work.

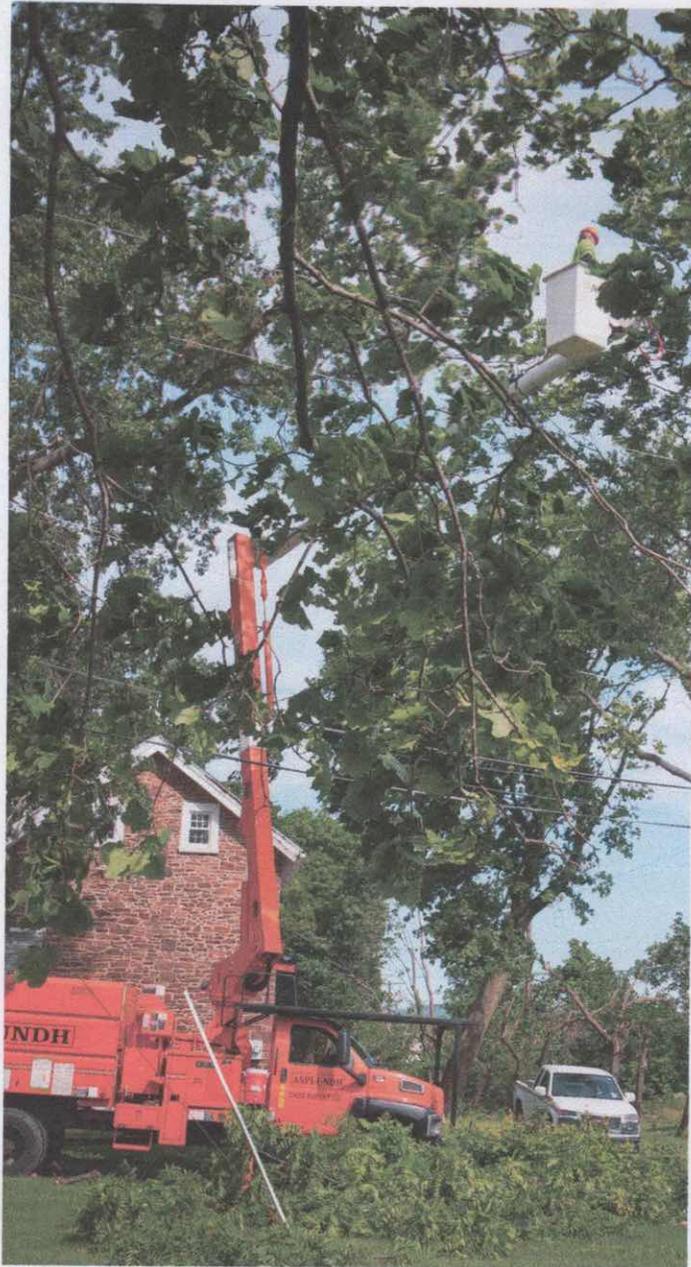
Before any pruning or tree removal occurs, vegetation conditions are assessed with consideration to tree species, growth rates, position of the lines and time since the last vegetation work was performed.

Our contractors use widely accepted industry best practices and techniques, including pruning that encourages quick and complete healing of removed branches and reduces both potential decay and growth of new sprouts. Before we begin work, we will attempt to visit your home to explain what our contractors will be doing. If no one is home, we will make another attempt to contact you.

## Our pledge to you

We understand that removing or trimming trees may not be popular with many landowners. We pledge to:

- Communicate with property owners in advance of regularly scheduled vegetation work.
- Work in a professional manner.
- Treat private property with care.
- Strike a careful balance — being sensitive to individual landowner concerns about vegetation management while, at the same time, doing the work that is needed to improve electric service reliability for all customers by keeping trees away from power lines.



### Don't endanger yourself

Please do not attempt to prune or remove trees near power lines. Contact with a power line can cause serious injury or death. PPL Electric Utilities' qualified line clearance tree trimmers have specialized training to work around our power lines.

PPL Electric Utilities does not prune or remove trees located around the service wire that is between your house and the pole. PPL Electric Utilities will de-energize your service wire and lower it to the ground so you can do the work safely.

This service is provided at no cost, but we require at least three business days' notice, and additional time may be required to schedule the work.

### Right tree in the right place

If you plan to plant a new tree, or replace an existing tree, please pay close attention to what you plant and where. When choosing a spot to plant your tree, make sure it will have plenty of room to grow to its full potential. Speak with the nursery where you plan to purchase the tree and tell them about any power lines so they can help you select the right tree.

Planting the right tree for the right place will make your property safer and more attractive and will reduce the likelihood of power outages. Our professional foresters can also advise you on proper tree selection for the location you have chosen.

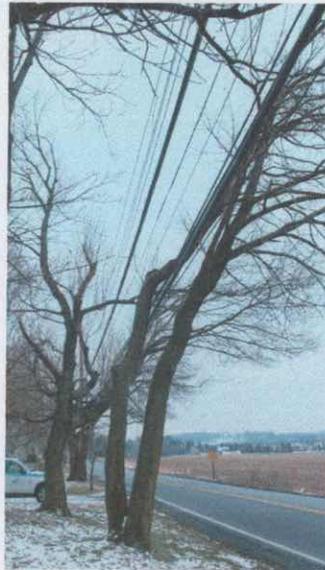
### Cleanup and wood chips

In urban areas, tree crews typically chip and remove smaller limbs and branches. Larger wood is generally cut into handling lengths and left at the base of the tree for property owner use.

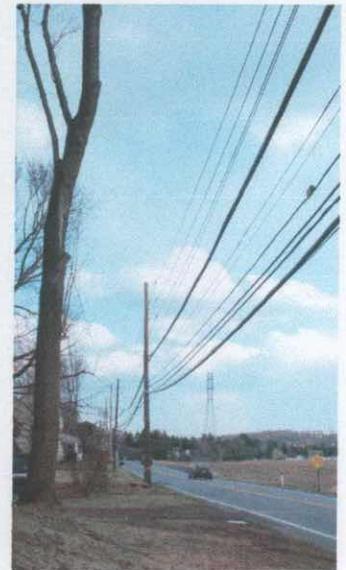
In more rural areas, where possible, tree crews will pile pruning debris to create wildlife cover and browse opportunities. Larger limb wood will be separated and left for property owner use.

Requests for wood chips are taken by the contractor tree crew foremen who do their best to grant your requests.

If you do request chips, be mindful that contractors will deliver full loads – 5 to 7 cubic yards. Contractors are not required to remove unused chips once delivered.



Before trimming



After trimming

PPL Electric Utilities works with state and local conservation, land management and environmental groups to advance common goals of electric reliability and environmental stewardship.  
[www.pplweb.com/vegetation](http://www.pplweb.com/vegetation)

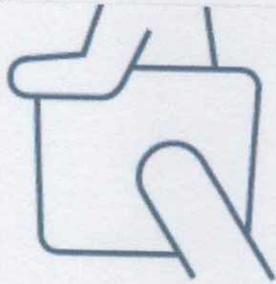


PPL Electric Utilities

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My Account   Outages and Issues

Visit [ppl electric.com](http://ppl electric.com)



Reliability



Jun 24 2021 | **Reliability** | 23 comments

## Keeping Lines Clear, Reducing Outages

### Our proactive approach

Trees are the number one cause of storm-related outages. That's why we take a proactive approach to keeping lines clear.

Thanks to the combined efforts of our vegetation management program, in 2020, we reduced

*page 43*

tree-related outages by 14 percent over the prior year.

## Here's how we do it:

### Routine trimming

We trim trees across 33,000 miles of overhead power lines to reduce the risk of outages. We have an established time- and- condition based maintenance program to make sure we're trimming trees at the right times. We also use data analytics and innovative technology to identify the areas with a higher probability of tree-caused outages.

Don't attempt to trim or remove trees near our lines on your own. Our qualified line clearance tree trimmers have specialized training to work around our power lines. If you want to remove a tree growing within 10 feet of a power line, call us first.

### Goodbye hazard trees

Imagine how difficult and dangerous it is when a large tree brings down power lines in a storm. Assessing the damage, clearing the area for safe repairs, and restoring power to those impacted by a downed line can take hours.

That's why we proactively remove hazard trees that pose a threat of falling and damaging our lines with permission from the property owner. The removal of these trees in advance of a storm prevents significant damage, removes a safety risk for the public and our employees, and reduces the likelihood of power outages.

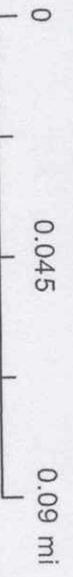
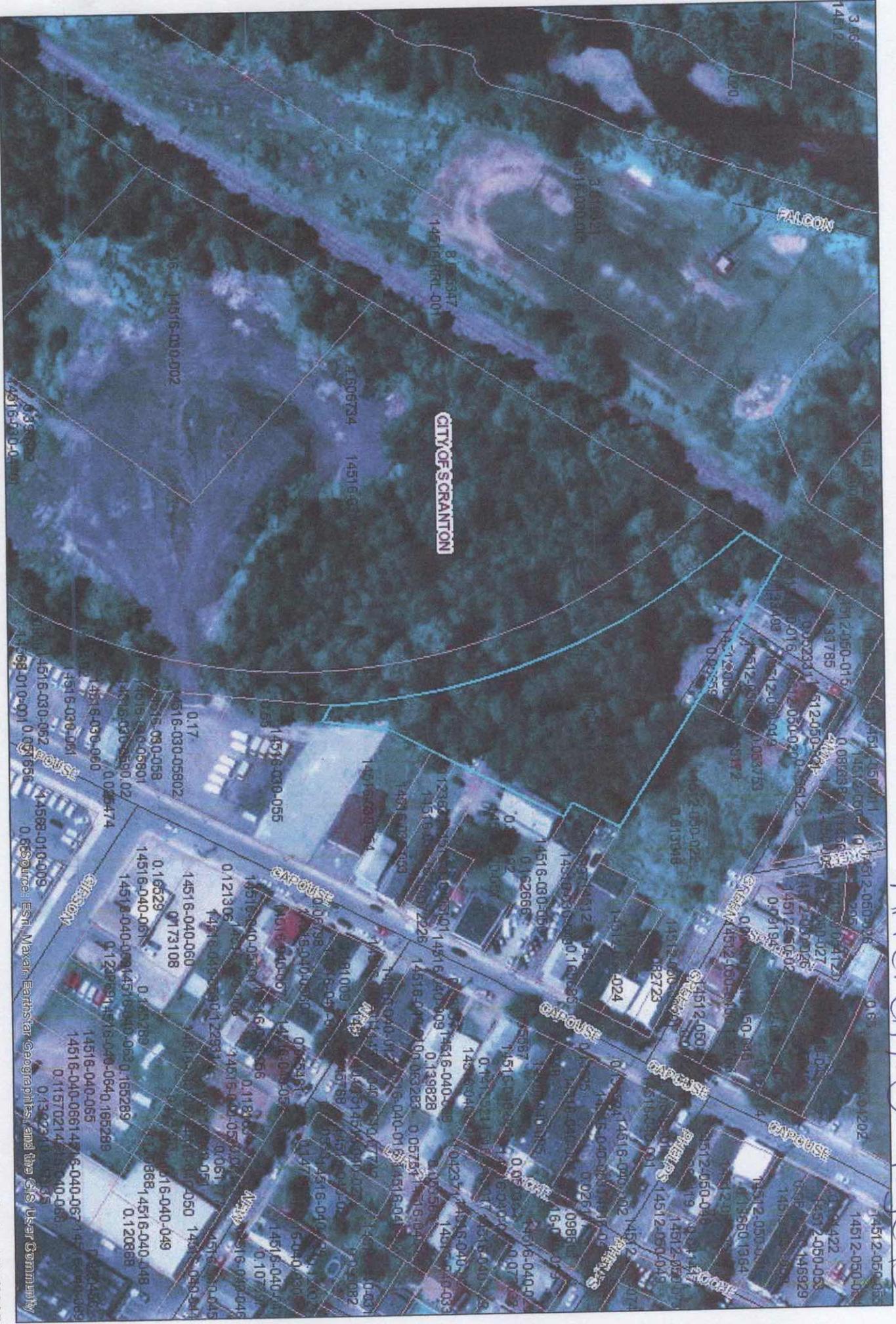
In addition to tree trimming, we install animal guards, inspect and maintain our lines and equipment, and continue to improve our smart grid technology to provide you with reliable service all throughout the year.

[Reliability](#) | [Safety](#) | [Tree Trimming](#)

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← [Improving reliability & feeding Tatu](#)

[Safety is everyone's responsibility, meow and furever](#) →



Date: 1/10/2025

Disclaimer:  
 The County of Lackawanna makes no representations, either expressed or implied, regarding the information contained on this map or its suitability for any particular purpose.

**REPORT DETAILS**

Report Filter:  
ApplyComparison("upper(#0)=upper(#1)",Structure\_Grid (ID),"57334N42685") And (Structure\_Grid = 57334N42685)

**PROMPT DETAILS**

Prompt 1: Please enter a structure grid to search for:  
57334N42685

Structure_Grid	Structure Type	Structure Subtype	Struct Type	Structure Install Day	Owner	Vested Owner	Location	Install Wr	Class	Material
57334N42685	Distribution Pole	Wood Pole	Single Pole	5/15/1998	PPL Owned	PPL ELECTRIC UTILITIES CORP		N21103	5	Pine-Creosote

Appendix G  
page 44

Data rows: 1 | 1

Pre Cut Ht	Operating Ht	Reinforcing Treatment	Pole Next Inspection Day	Pole Next Painting Day	Pole Reinforcing Day	Tower Type	Tower Volt	Remark	La Op
35	35	Unknown							

? x

x

Data columns: 0

st Update  
er

**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	Struct Type	Structure Install Day	Owner	Vested Owner	Location	Install Wr	Class	Material
57317N46297	Distribution Pole	Wood Pole	Single Pole	10/15/1979	PPL Owned	PPL ELECTRIC UTILITIES CORP		=35175	3	Pine-Creosote

Data rows: 1 | 0

Pre Cut Ht	Operating Ht	Reinforcing Treatment	Pole Next Inspection Day	Pole Next Painting Day	Pole Reinforcing Day	Tower Type	Tower Volt	Remark	Last Op OSI
30	30	C-Truss	Unknown			8/2/2012			

? x

x

ata columns: 0

Update  
or  
MOSE

**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 Type	Structure Install Day	Owner	Vested Owner	Location	Install Wr	Class	Material
57339N46273	Distribution Pole	Wood Pole	Single Pole	5/15/1970	PPL Owned	PPL ELECTRIC UTILITIES CORP		#01719	5	Pine-Creosol

Data rows: 1 | 0

Pre Cut Ht	Operating Ht	Reinforcing Treatment	Pole Next Day	Inspection Day	Pole Next Painting Day	Pole Reinforcing Day	Tower Type	Tower Volt	Remark	Last Op
35	35		Unknown							

Data columns: (

Last Update  
Oper  
#42990

page 54

**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	Struct Type	Structure Install Day	Owner	Vested Owner	Location	Install Wr	Class	Material
57320N46302	Distribution Pole	Wood Pole	Single Pole	3/15/1976	PPL Owned	PPL ELECTRIC UTILITIES CORP		~20010	5	Pine-Creosote

Data rows: 1

al	Pre Cut Ht	Operating Ht	Reinforcing Treatment	Pole Next Inspection Day	Pole Next Painting Day	Pole Reinforcing Day	Tower Type	Tower Volt	Remark
	35	35		Unknown					

? x

x

ata columns: 0

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**REPORT DETAILS**

Report Filter:  
ApplyComparison("upper(#0)=upper(#1)",Structure\_Grid (ID),"57327N46297") And (Structure\_Grid = 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	Pre Cut Ht	Op Ht	Trans Wr
C-Tagged Pole	Pine-Creosote	D	35	

?

x

x

Data columns: 0



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