

May 31, 2025

Secretary

PA Public Utility Commission

Commonwealth Keystone Building

2nd Floor, Room – N201

Harrisburg, PA 17120

Subject: C-2024-3050485

Michael and Sharon Hartman v. PPL

Motion to Resume Second Formal Complaint

Dear Secretary,

I hereby certify that on May 31, 2025, I served a true copy of the Complainants' Motion upon the parties, listed below, in accordance with the requirements of § 1.54 (relating to service by a party) via email.

Honorable Emily L. Devoe (via email [edevoe@pa.gov](mailto:edevoe@pa.gov))

Devin Ryan, Esquire (via email [dryan@postschell.com](mailto:dryan@postschell.com))

Alice Wade, Esquire (via email [alice.wade@postschell.com](mailto:alice.wade@postschell.com))

Post and Schell

Michael J. Shafer, Esquire (via email [mjshafer@pplweb.com](mailto:mjshafer@pplweb.com))

PPL Electric Utilities

*Michael Hartman*

Michael Hartman Dated this 31st day of May 2025

Michael C. Hartman  
Sharon R. Hartman  
1650 Primrose Lane  
Dauphin, PA 17108  
(717) 315-9473  
[angelgah@comcast.net](mailto:angelgah@comcast.net)

May 31, 2025

VIA ELECTRONIC FILING

Honorable Emily DeVoe  
Administrative Law Judge  
PA Public Utility Commission  
Suite 220, Piatt Place  
301 Fifth Avenue  
Pittsburgh, PA 15222

Re: Michael and Sharon Hartman v. PPL Electric Utilities Corporation  
Docket Nos. C-2024-3050485

Your Honor:

Michael and Sharon Hartman, Complainants, submit this Motion to lift the Stay and resume our July 2024 Formal Complaint, C-2024-3050485, versus PPL Electric Utilities Corporation (PPL) and to direct the Respondent to honor the Complainants' September 9, 2024, Request for the Production of Documents.

On October 21, 2024, in the above captioned second Formal Complaint proceeding, per Ordering Paragraph 3 of that Order, the parties were directed to "file a status report, and any appropriate motion, within 20 days of the entry of the Commission's Final Order in Docket Number C-2019-3008272."

Your Honor, please do not construe our silence as acquiescence to PPL's repeated attempts to dismiss and Stay this matter. The Stay of Discovery and protracted negotiations to resolve this matter are reminiscent of the Respondent's Discovery improprieties and repeated delays which unduly prejudiced the Complainants during the first Formal Complaint.

Your Complainants have not appealed the Commissioners' Opinion and Order in the first Formal Complaint.

Your complainants respectfully submit that the second Formal Complaint consists of two prongs, neither of which were addressed within the Honorable Judge Haas' Initial Decision or the Commissioners' February 28, 2025 Opinion and Order.

**First prong, False Testimony:**

PPL counsel, through PPL employee witnesses, either recklessly or knowingly, submitted misleading and false testimony to the PUC during the August and September 2022 Hearing. Probative evidence necessary to prove the misleading and false nature of that testimony was not known to the Complainants until 2023 and 2024, after the evidentiary record was closed in the first Formal Complaint.

**Second prong, 2023 and 2024 Vegetation Management:**

PPL postponed scheduled 2021 and 2022 vegetation management activity on neighboring public and private lands until 2023 and 2024 to conceal the fact that the 2021 vegetation management activity on the Complainants' property was both unreasonable and discriminatory. PPL's 2023 and 2024 vegetation management activity demonstrated that the 2022 testimony of PPL's Forester, Matthew Stutzman, was false. During 2023 and 2024, PPL selectively controlled incompatible vegetation and spared compatible vegetation on neighboring public and private lands in a manner that Stutzman falsely testified was not feasible.

During 2023 and 2024, PPL failed to control incompatible vegetation and invasive noxious weeds on the Complainants' property. At the same time, PPL did control incompatible vegetation and invasive noxious weeds on the neighboring private and public property on the same powerline covered by the same Right of Way agreement as the Respondent's agreement

with the Complainants. The unreasonable and discriminatory 2023 and 2024 vegetation management activity, alone, serve as a basis for the second Formal Complaint.

### **BASIS FOR COMPLAINANTS' MOTION**

Your Complainants respectfully suggest that the January 8, 2025, Order and Opinion published on February 28, 2025, failed to address any aspect of the second Formal Complaint. Notably, the Order and Opinion failed to address the false testimony of PPL witnesses, and PPL's 2023 and 2024 unreasonable and discriminatory vegetation management activity on the Complainants' property and neighboring private and public property.

An example, Opinion and Order Page 90:

“Regarding vegetation management, PPL’s witness, Mr. Stutzman, testified that PPL did not apply herbicides to the U.S. NPS property within the Project area. Rather, PPL engaged in “hand cut” control on these areas because that was a condition of the federal permit PPL had to secure for that property. PPL M.B. at 40 (citing PPL Stmt. 4 at 21). No such permit was required for the Hartman right-of-way or any other private landowner’s property impacted by the Project.”

During 2023 and 2024, however, PPL applied herbicides to the National Park Service Lands that border the Complainants' property. And PPL completed the herbicide application without first obtaining a federal permit. Why, because a Federal Permit is not required to apply herbicides to NPS Lands. PPL's (Stutzman's) testimony was false. Your Complainants introduce this fact in the second Formal Complaint not to establish that the first Formal Complaint 2021 activity was unreasonable and discriminatory, but to corroborate additional evidence that the 2023 and 2024 vegetation management activity (service) afforded the Complainants' property was unreasonable and discriminatory.

The Commissioners' Opinion and Order, itself, make clear that the Respondent's activity that form the basis of Second Formal Complaint was not considered or addressed in the February 28, 2025 Order, Page 12 and 13, as follows:

“Commission dockets indicate that on August 1, 2024, the Hartmans filed a formal complaint with the Commission at Docket No. C-2024-3050485, naming PPL as Respondent. The

complaint allegations in the August 1, 2024 formal complaint, at Docket No. C-2024-3050485, specifically reference the instant docket (No. C-2019-3008272) under consideration by the Commission and further raise substantive and procedural allegations related to the docket now under consideration. As noted, the record of this proceeding is closed. Based on the closure of this record, we shall not entertain allegations of procedural misconduct in this proceeding nor allegations of a substantive nature that are directly related to the record of the matter under consideration that are asserted by the Hartmans in the context of a separate, docketed formal complaint. Absent a determination by the Commission for reopening of this record for purposes of the receipt of additional evidence, or consolidation of the proceedings, the complaint filed August 1, 2024, at Docket No. C-2024-3050485 shall proceed according to the merits of that docketed matter.”

In contradiction to the Respondent’s May 21, 2025, Pleadings, officials with the PUC’s Office of Special Assistants, the PUC’s Office of Administrative Law Judge, the Office of the PA Consumer Advocate, and PA Commonwealth Court staff have consistently advised your Complainants’ that no new evidence could be presented during any appeal of the February 28, 2025 Opinion and Order. Likewise, during August 2023, PPL outside counsel informed your Complainants that the first Formal Complaint was closed and that the PUC would not consider evidence associated with the Respondent’s 2023 vegetation management activity on neighboring property to adjudicate the first Formal Complaint. August 14 and 15, 2023, emails among your Complainants and Respondent’s outside counsel accompany this Motion as Attachment A.

Your Honor’s attention is invited to an excerpt of Complainant’s May 15, 2024, email addressed to PUC Officials, below. The entire email chain is contained within Attachment B to this Motion, and incorporated herein by reference.

**From:** Sharon Hartman <[angelgah@comcast.net](mailto:angelgah@comcast.net)>  
**Sent:** Wednesday, May 15, 2024 8:33 AM  
**To:** Brown, Kriss <[kribrown@pa.gov](mailto:kribrown@pa.gov)>; Liddell, Kathryn <[kliddell@pa.gov](mailto:kliddell@pa.gov)>; Mumford, Daniel <[DMUMFORD@pa.gov](mailto:DMUMFORD@pa.gov)>  
**Subject:** Fwd: RE: [External] Fwd: PPL False PUC Hearing Testimony

Please advise when I can expect a response to my May 9th email, below.

What is the process for the PUC to investigate allegations that PPL knowingly presented false and misleading testimony during a PUC Initial Hearing?

What is the procedure when the falsity of the testimony is determined after the Hearing is closed and Briefs, Reply Briefs, Exceptions and Reply Exceptions have been filed?

Thank you,

Mike Hartman

On May 16, 2024, Ms. Rosemary Chiavetta, Esquire, Secretary of the Commission, responded, in part:

The record of this case is now closed which means no further testimony or evidence will be accepted on the record.

Your Honor, your Complainants respectfully submit that the first Formal Complaint is forever corrupted by the knowing and unknowing materially false and misleading testimony submitted by the Respondent PPL and the Honorable Judge Haas refusal to hear and accept the Complainants' Surrebuttal testimony and exhibits. The first Formal Complaint is Closed, and the Commission, Commonwealth Court and the State Supreme Court will never consider PPL's 2023 and 2024 unreasonable, discriminatory and corrupt activity in adjudicating the first Formal Complaint. Furthermore, PPL strongly maintains that the Commission's February 28, 2025, Order is unlawful and will be reversed due to the PUC's lack of jurisdiction.

Your Complainants' respectfully ask, "does the PUC have jurisdiction over knowingly false and misleading testimony presented by PPL witnesses before the PUC?" Testimony that will be proven false based on facts that only became known after the evidentiary record for the first Formal Complaint was closed.

Your Complainants anxiously await the resumption of the second Formal Complaint and a Status Hearing to discuss the Commissions' jurisdiction in this matter considering the evidence presented to date in the second Formal Complaint.

Sincerely,

*Michael C. Hartman*

Michael C. Hartman

*Sharon R. Hartman*

Sharon R. Hartman,

Complainants

CERTIFICATE OF SERVICE

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

VIA EMAIL:

Mr. Devin Ryan  
Counsel for Respondent PPL  
via Email [dryan@postschell.com](mailto:dryan@postschell.com)

Ms. Alice Wade  
Counsel for Respondent PPL  
via Email [alice.wade@postschell.com](mailto:alice.wade@postschell.com)

Mr. Michael Shaffer  
Counsel for Respondent PPL  
via Email [mjshaffer@pplweb.com](mailto:mjshaffer@pplweb.com)

**Attachment A Complainants' Motion to lift Stay**

----- Original Message -----

From: "Ryan, Devin" <DRyan@PostSchell.com>

To: Sharon Hartman <angelgah@comcast.net>

Cc: "Michael J. Shafer (mjshafer@pplweb.com)" <mjshafer@pplweb.com>, "Stobbe, Nicholas" <NStobbe@PostSchell.com>

Date: 08/15/2023 12:08 PM EDT

Subject: RE: Discriminatory Service

Good afternoon, Mr. Hartman,

PPL Electric disagrees with your characterization of Mr. Stutzman's testimony. The evidentiary record is closed, and we await the decision from Judge Haas.

Sincerely,

**Devin Ryan**

**Principal**

**Post & Schell, P.C.**

17 North Second Street

12th Floor

Harrisburg, PA 17101

717-612-6052 (Phone)

717-731-1981 (Fax)

[DRyan@PostSchell.com](mailto:DRyan@PostSchell.com)

[www.postschell.com](http://www.postschell.com)

**From:** Sharon Hartman <angelgah@comcast.net>

**Sent:** Monday, August 14, 2023 3:07 PM

**To:** Stobbe, Nicholas <NStobbe@PostSchell.com>; Ryan, Devin <DRyan@PostSchell.com>;

Michael J. Shafer (mjshafer@pplweb.com) <mjshafer@pplweb.com>

**Subject:** Discriminatory Service

Mr. Ryan,

Are you aware that within the past approximate 30 days PPL selectively applied herbicides to saplings and small trees, only, on neighboring NPS Lands on our powerline and NPS Lands and private Wech property on the intersecting powerline.

Vegetation surrounding the saplings was spared.

You may recall that PPL contractors applied herbicides to a large quadrant of our property above Pole 75, and a smaller quadrant below Pole 76 and destroyed all vegetation within the quadrants.

The recent activity materially contradicts Stutzman's sworn testimony that it was not feasible or safe to selectively apply herbicides on our property, or Peters Mountain, generally, due to the terrain.

Also, the applicator accessed the ROW above Pole 73 without the benefit of an access road. The old access road had been abandoned and re-vegetated during the NPS Land restoration. No stone or rip-rap was applied.

Photographs are available if you wish to sincerely address this development.

Please consider notifying Judge Haas that Mr. Stutzman's testimony has been proven false and inaccurate based on the recent activity of PPL or PPL contractors.

Sincerely yours,

Mike Hartman

**Attachment B Complainants' Motion to Lift Stay May 31, 2025 C-2024-3050485**

Series of emails to the PUC culminating in Rosemary Chiavetta's May 16, 2024 email to Complainants wherein Secretary Chiavetta reported that **"The record of this case is now closed which means no further testimony or evidence will be accepted on the record."**

----- Original Message -----

From: "Chiavetta, Rosemary" <rchiavetta@pa.gov>  
To: Sharon Hartman <angelgah@comcast.net>  
Date: 05/16/2024 4:03 PM EDT  
Subject: Docket Number C-2019-3008272

Ms. Hartman:

Your communications below were forwarded to me because your formal complaint case at the above docket number is still pending before the Commission for a final decision. Therefore, staff is precluded from discussing the case due to the prohibition of ex parte communications under Section 334(c) of the PA Public Utility Code.

The docket number above is the correct docket number of your formal complaint case. The ALJ's Initial Decision was issued on October 3, 2023. Exceptions and Reply Exceptions were filed timely by both parties in October of 2023. There was also a request for an extension of time granted to you to file additional material in November of 2023. The record of this case shows lengthy litigation caused by motions to extend time deadlines, compel the production of documents, and postpone hearings.

The record of this case is now closed which means no further testimony or evidence will be accepted on the record. Once the Commission considers the matter and adopts a final order, the parties will be served with that final order. If you disagree with the decision, you will then have thirty days from the entry date of the order to appeal it to the Commonwealth Court of Pennsylvania. If you decide to appeal, you may then pursue your allegations against PPL regarding the testimony the company offered.

Thank you for your comments.

*Secretary Rosemary Chiavetta, Esq.*

*Pennsylvania Public Utility Commission*

*Commonwealth Keystone Building*

*400 North Street*

*Harrisburg, Pennsylvania 17120*

*rchiavetta@pa.gov*

**From:** Sharon Hartman <[angelgah@comcast.net](mailto:angelgah@comcast.net)>

**Sent:** Wednesday, May 15, 2024 8:33 AM

**To:** Brown, Kriss <[kribrown@pa.gov](mailto:kribrown@pa.gov)>; Liddell, Kathryn <[kliddell@pa.gov](mailto:kliddell@pa.gov)>; Mumford, Daniel <[DMUMFORD@pa.gov](mailto:DMUMFORD@pa.gov)>

**Subject:** Fwd: RE: [External] Fwd: PPL False PUC Hearing Testimony

Please advise when I can expect a response to my May 9th email, below.

What is the process for the PUC to investigate allegations that PPL knowingly presented false and misleading testimony during a PUC Initial Hearing?

What is the procedure when the falsity of the testimony is determined after the Hearing is closed and Briefs, Reply Briefs, Exceptions and Reply Exceptions have been filed?

Thank you,

Mike Hartman

(717) 315-9473

----- Original Message -----

**From:** Sharon Hartman <[angelgah@comcast.net](mailto:angelgah@comcast.net)>

**To:** "Brown, Kriss" <[kribrown@pa.gov](mailto:kribrown@pa.gov)>, "Liddell, Kathryn" <[kliddell@pa.gov](mailto:kliddell@pa.gov)>, "Mumford, Daniel" <[DMUMFORD@pa.gov](mailto:DMUMFORD@pa.gov)>

**Date:** 05/09/2024 3:29 PM EDT

**Subject:** RE: [External] Fwd: PPL False PUC Hearing Testimony

Thank you for your reply.

I have no assurance, however, that the Commission has or will consider or investigate our allegations of PPL's knowing submission of false, misleading and inaccurate testimony.

Judge Haas failed to address the false, misleading and inaccurate testimony in his Initial Decision.

We can't wait indefinitely and lose other civil remedies due to the statute of limitations.

The false testimony was submitted nearly 2 years ago.

Absent a representation that the Commission will address this matter within the next 60 days, we have no choice but to file a new Formal Complaint.

I hope that the integrity and veracity of a public utility is the number one concern of the PUC, and when confronted with significant evidence to the contrary, the PUC will investigate and act accordingly.

Sincerely,

Michael Hartman

On 05/09/2024 3:06 PM EDT Brown, Kriss <[kribrown@pa.gov](mailto:kribrown@pa.gov)> wrote:

Mr. Hartman, your complaint is currently pending before the Commission and will be addressed by the Commission at a Public Meeting.

Kriss Brown

**Kriss E. Brown**

Deputy Chief Counsel Law Bureau

Deputy Director of OCMO

[www.puc.pa.gov](http://www.puc.pa.gov)

**Phone:** 717-787-4518

**Mobile:** 717-836-6399

**Email:** [kribrown@pa.gov](mailto:kribrown@pa.gov)

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**From:** Sharon Hartman <[angelgah@comcast.net](mailto:angelgah@comcast.net)>

**Sent:** Thursday, May 09, 2024 2:29 PM

**To:** Brown, Kriss <[kribrown@pa.gov](mailto:kribrown@pa.gov)>; Liddell, Kathryn <[kliddell@pa.gov](mailto:kliddell@pa.gov)>; Mumford, Daniel <[DMUMFORD@pa.gov](mailto:DMUMFORD@pa.gov)>

**Subject:** [External] Fwd: PPL False PUC Hearing Testimony

**ATTENTION:** *This email message is from an external sender. Do not open links or attachments from unknown senders. To report suspicious email, use the Report Phishing button in Outlook.*

I received an automatic reply from Mr. Mumford.

Our case number is 2019-30008272, not 2022. Our unresolved Formal Complaint is 5 years old.

Could either one of you please assist with my repeated request for a PUC investigation of knowingly false, inaccurate and misleading testimony submitted by PPL during our initial hearing?

Thank you,

Mike Hartman

717-315-9473.

----- Original Message -----

**From:** Sharon Hartman <[angelgah@comcast.net](mailto:angelgah@comcast.net)>

**To:** "[dmumford@pa.gov](mailto:dmumford@pa.gov)" <[dmumford@pa.gov](mailto:dmumford@pa.gov)>

**Date:** 05/09/2024 1:02 PM EDT

**Subject:** Fwd: PPL False PUC Hearing Testimony

Mr. Mumford,

I sent the below email to [ra-ocmo@pa.gov](mailto:ra-ocmo@pa.gov) at the recommendation of a PUC employee and have not received an acknowledgement or reply.

I have additional evidence that PPL knowingly presented false and misleading testimony during our August and September 2022 Initial Hearing, and that testimony, on occasion 3rd party hearsay, was blindly accepted as fact by the ALJ.

Our case remains under review by the Office of Special Assistants since November 2023.

Your guidance would be greatly appreciated.

Thank you,

Mike Hartman

717-315-9473

----- Original Message -----

From: Sharon Hartman <[angelgah@comcast.net](mailto:angelgah@comcast.net)>

To: "[ra-ocmo@pa.gov](mailto:ra-ocmo@pa.gov)" <[ra-ocmo@pa.gov](mailto:ra-ocmo@pa.gov)>

Date: 02/16/2024 11:48 AM EST

Subject: PPL False PUC Hearing Testimony

Your attention is invited to our Exceptions and Reply Exceptions, attached, Hartman vs. PPL C-2029-30008272

Please help me identify the individual or department tasked with ensuring the integrity of PUC Hearings.

Pennsylvania residents are asked to assume that PPL, and other public utility billers, are 100% trustworthy.

Likewise, it is evident that PUC Administrative law Judges accept PPL sworn testimony as 100% true and accurate.

I have repeatedly requested a PUC investigation of false testimony presented by PPL Counsel during our formal hearing to no avail.

The false testimony submitted by PPL concerned a material aspect of our case; the excavation, removal and use of our private property, topsoil and mountain stone, within and outside of the Right of Way, to construct PPL construction pads situated primarily on neighboring property.

On or about August 16, 2022, PPL counsel knowingly presented the following false testimony through William Salisbury, a PPL Field Supervisor:

**“As a courtesy to Mr. Hartman, PPL Electric marked the property lines for Mr. Hartman’s property and the Wech property within the transmission line right-of-**

**way, and PPL required its contractors not to transfer “topsoil,” “mountain stone,” or other materials between the two properties”,**

It is presently unknown whether Mr. Salisbury was aware that the statement was false, when introduced. PPL counsel, however, was certainly aware of its falsity.

Since December 2018, I repeatedly confronted PPL employees, including Thomas Eby, PPL Contractors, and PPL counsel, orally and in writing, with my finding that PPL excavated vegetation, topsoil, and mountain stone from our property, and transferred same to neighboring Wech property to construct the Pole 75 and Pole 76 crane pads. I included the allegation in our original formal complaint, **March 2019**, and reported same to ALJ Calvelli, the PUC Mediator and Judge Haas in the presence of Thomas Eby, Michael Shafer, Kimberly Krupka and Devin Ryan. I included the topic in Discovery Requests and Interrogatories. At no time and in no instance did PPL employees, contractors or counsel allude to or even suggest the “story” presented by Salisbury in the Salisbury Rebuttal Statement.

At the time of construction and restoration activity until April 2019 when I advised PPL otherwise, PPL mistakenly believed that we owned the entire ROW as represented by PPL in the E& S Plans, particularly PPL Exhibit TE – 1, Attachments 114 and 115.

There is no reason to believe that Salisbury knew the actual Hartman/Wech property line when the misappropriation of Hartman topsoil and mountain stone occurred during December 2018. Furthermore, there is doubt that Salisbury was even present when the excavation occurred given Salisbury’s inability to identify a single witness or participant that could corroborate his testimony.

We invited Judge Haas' attention to the Hartman Exhibit 19 photograph which depicted the real-time excavation of the Hartman/Wech logging road and the construction of the Pole 76 crane pad. PPL did not lightly excavate the formerly sod covered logging road. PPL excavated an approximate 8 feet deep interruption of the mountain slope and created high walls (cliffs) to the left (north) and ahead (east) on the edge of the ROW. The displaced soil and mountain stone were used to build the Pole 76 crane pad situated primarily on Wech property. The logging road which formerly facilitated motorized traffic between our property and the Wech property was destroyed and never restored. Clearly, PPL did not “mark” the Hartman/Wech border as represented, and there is no evidence that PPL segregated Hartman and Wech topsoil and mountain stone. Furthermore, the segregation of our and Wech soil as represented would have been virtually impossible given the deep excavation.

The falsity of Salisbury’s representation, whether knowing or from a faulty memory, can be gleaned from the Salisbury cross examination, Page 128. Question: “At the time that you were on the property doing the construction, did you believe that we - the Hartman's owned the entire wide of right-of-way in the limit of destruction?” Salisbury’s Answer: I’ll

be honest, your honor, you know, I don't often consider the names, sir, anything of the people that, you know, own these property lines, that is something that's more of a right-of-way issue. You know, in construction we stay focused on safety, reliability and falling in line with what we need to do as far as the environmental controls like the limited disturbance.”

Salisbury cross examination, Page 94, Question: “Mr. Salisbury, were you present when the road was constructed? Answer: I was present at certain times. I was running a lot of jobs at the time throughout the entire project so I was not always present every minute of the workday. But I was there at your property when the road was being built and throughout that project.”

On Salisbury cross examination Page 114, Salisbury doubled down with an additional false statement: “And as I recall, sir, we came to your property and tried to put down topsoil but appeared not enough to appease the needs that you had. I mean, that was an additional cost, you know, that was incurred on the project to try to, you know, help remedy with the landowner.” During Cross, Page 116, PPL counsel stipulated that no topsoil was ever delivered to the Hartman property. Salisbury misremembered.

PPL's knowing submission of false testimony is especially troubling given PPL's repeated Discovery irregularities.

Despite repeated Formal and Informal Discovery Requests, including Mediation, PPL refused to identify the PPL contractors that excavated our property until March 2022, three years after the Formal Complaint was filed.

Despite repeated Formal and Informal Discovery Requests, including Mediation, PPL refused to identify William Salisbury, the PPL employee that reportedly supervised the construction activity, until April 2022, more than three years after the Formal Complaint was filed.

PPL refused to answer Interrogatories directed to William Salisbury, or any PPL Field Supervisor.

A PUC inquiry with the alleged PPL excavation contractors, M. J. Electric and Newville Construction Services, Inc. will confirm the falsity of the PPL testimony.

M. J. Electric and Newville Construction Services, Inc. have refused to speak to us, first at the direction of PPL, and now their respective Counsel, below.

Nicholas E. Sulpizio

[nsulpizio@rtjglaw.com](mailto:nsulpizio@rtjglaw.com)

(856) 810-8860

Ricci Tyrell Johnson & Grey

750 Route 73 South, Suite 202B

Marlton, NJ 08053

Attorney for M. J. Electric, LLC

Brooks R. Foland

[brfoland@mdwgc.com](mailto:brfoland@mdwgc.com)

Yael L. Dadoun

[yldadoun@mdwgc.com](mailto:yldadoun@mdwgc.com)

(717) 651-3714

100 Corporate Center Drive, Suite 201

Camp Hill, PA 17011

Telephone: (717) 651-3714

Attorney for Newville Construction Services Inc.

**Please advise if the PUC will investigate this matter.**

Sincerely yours,

Michael Hartman

Complainant

(717) 315-9473