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September 18, 2025

VIA ELECTRONIC FILING

Matthew L. Homsher, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, Filing Room
Harrisburg, PA 17120

Re: Jesse Tashlik v. Pike County Light & Power Company; Docket No. C-2025-3057163; **PIKE COUNTY LIGHT & POWER COMPANY'S PRELIMINARY OBJECTIONS TO FORMAL COMPLAINT**

Dear Secretary Homsher:

Enclosed for filing with the Pennsylvania Public Utility Commission is Pike County Light & Power Company's Preliminary Objections to the Formal Complaint in the above-referenced matter.

If you have any questions regarding this filing, please contact me.

Very truly yours,

/s/ Whitney E. Snyder

Whitney E. Snyder
Erich W. Struble

Counsel for Pike County Light & Power Company

WES/das

Enclosures

cc: Per Certificate of Service

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

JESSE TASHLIK	:	
	:	
Complainant,	:	
	:	
v.	:	Docket No. C-2025-3057163
	:	
PIKE COUNTY LIGHT & POWER	:	
COMPANY,	:	
	:	
Respondent.	:	

NOTICE TO PLEAD

You are hereby advised that, pursuant to 52 Pa. Code § 5.61, you may file a response within ten (10) days of the attached preliminary objections. Any response must be filed with the Secretary of the Pennsylvania Public Utility Commission, with a copy served to counsel for Pike County Light & Power Company, and where applicable, the Administrative Law Judge presiding over the issue.

File with:
Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, Second Floor
Harrisburg, PA 17120

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

JESSE TASHLIK	:	
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Complainant,	:	
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v.	:	Docket No. C-2025-3057163
	:	
PIKE COUNTY LIGHT & POWER	:	
COMPANY,	:	
	:	
Respondent.	:	

**PIKE COUNTY LIGHT & POWER COMPANY’S
PRELIMINARY OBJECTIONS TO FORMAL COMPLAINT
OF JESSE TASHLIK**

Pursuant to 52 Pa. Code § 5.101, Pike County Light & Power Company (“Pike”) files Preliminary Objections to the Formal Complaint of Jesse Tashlik (“Complainant”). Pike requests the Complaint be dismissed with prejudice. To the extent the Complaint is not dismissed, Pike requests the Commission specifically delineate what issues are set for hearing.

I. INTRODUCTION

1. The Complaint should be dismissed for lack of Commission jurisdiction and legal insufficiency.
2. The Complaint should be dismissed in its entirety for legal insufficiency because Complainant seeks relief that would violate Pike’s tariff and result in preferential treatment for Complainant, all of which is prohibited under the Public Utility Code.
3. The Complaint should be dismissed for lack of Commission jurisdiction because the gravamen of the Complaint is a property dispute that also seeks the Commission to find

violations of municipal ordinances regarding utility infrastructure placement. The law is well established that the Commission does not have jurisdiction to adjudicate such claims.

4. The Complaint should also be dismissed for legal insufficiency. The Complaint fails to state a claim upon which relief can be granted because municipal ordinances as a legal matter cannot control placement of utility infrastructure and the Commission has left the design and placement of electric distribution poles and infrastructure to the managerial discretion of utilities.

II. LEGAL STANDARDS FOR PRELIMINARY OBJECTIONS

5. The Commission's regulations permit the filing of preliminary objections to any pleading, except motions and prior preliminary objections. 52 Pa. Code § 5.101(a).

6. For purposes of disposing the preliminary objections, the Commission must accept as true all well pleaded material facts of the non-moving party, as well as every reasonable inference deducible from those facts. *Cnty of Allegheny v. Commonwealth*, 490 A. 2d 402 (Pa. 1985); *Commonwealth v. Bell Telephone Co. of Pa.*, 551 A.2d 602 (Pa. Cmwlth. 1988). The Commission must view the pleadings in the light most favorable to the non-moving party and should dismiss a pleading only if it appears that the non-moving party would not be entitled to relief under any circumstances as a matter of law. *Equitable Small Transportation Intervenors v. Equitable Gas Co.*, Docket No. C-00935435, 1994 WL 932315, at *1 (Opinion and Order entered Jul. 18, 1994); *see also Interstate Traveler Servs., Inc. v. Pa. Dep't of Env't. Res.*, 406 A.2d 1020 (Pa. 1979).

7. "For purposes of testing the legal sufficiency of the challenged pleading, a [motion to dismiss] ... admits as true all well-pleaded, material, relevant facts, and every inference deducible from those facts." *Marinoff v. Bell Telephone Co. of Pa.*, Docket No. C-913511, 1991

WL 474858 (1991). Also, when considering preliminary objections, one need not accept as true conclusions of law, unwarranted inferences from facts, argumentative allegations, or expressions of opinion. *Andrew Star v. PECO Energy Co.*, Docket No. C-2017-2615628, 2017 WL 4864901, at *2 (Initial Decision entered Oct. 4, 2017) (citing *Commonwealth v. Golden Gate Nat'l Senior Care LLC*, 158 A.3d 203, 213 (Pa. Cmwlth. 2017)), *aff'd* (Final Order entered Dec. 5, 2017).

III. THE COMPLAINT IS LEGALLY INSUFFICIENT BECAUSE IT FAILS TO STATE A CLAIM UPON WHICH RELIEF CAN BE GRANTED – RELIEF REQUESTED IS PROHIBITED BY TARIFF

8. The Complaint should be dismissed because Complainant seeks relief directly prohibited by Pike's tariff that if granted would result in illegal unreasonable preferential treatment.

9. It is axiomatic that public utility tariffs have the force and effect of law and are binding on the customer as well as the utility. *See Pennsylvania Electric Co. v. Pennsylvania Public Utility Commission*, 663 A.2d 281, 284 (Pa. Cmwlth. 1995).

10. Public utilities cannot grant unreasonable preferences or advantages to a customer. 66 Pa. C.S. § 1304. (“No public utility shall, as to rates, make or grant any unreasonable preference or advantage to any person, corporation, or municipal corporation, or subject any person, corporation, or municipal corporation to any unreasonable prejudice or disadvantage.”).

11. Consistent with the Commission's regulations requiring customers to pay for utility pole location requests, 52 Pa. Code § 57.27, Pike has a tariff provision that mirrors this regulation:

6.7 RELOCATION OR REMOVAL OF FACILITIES The Company shall, upon request of an applicant and after receipt of payment by the applicant as provided for below, relocate or remove its distribution facilities where possible. Applicant shall pay to the Company the total estimated cost of the relocation or removal except that the payment required of a residential property owner who is not entitled to receive condemnation damages to cover the cost of the requested relocation or removal shall be limited to the estimated Contractor Costs, Direct Labor Costs and/or Direct Material Costs

less an amount equal to maintenance expenses avoided as a result of the relocation. The following definitions shall apply only to this rule:
Contractor Costs - The amount paid by the Company to a contractor for work performed on the requested relocation or removal.

Direct Labor Costs - The pay and expenses of the Company's employees directly attributable to work performed on the requested relocation or removal but not to include construction overheads, payroll taxes, workmen's compensation expenses or similar expenses.

Direct Material Costs - The purchase price of materials used in performing the requested relocation or removal but not to include related stores expense. In computing these costs, proper allowance shall be made for unused materials, materials recovered from temporary structures and for discounts allowed and realized in the purchase of materials.

Pike Tariff Supplement No. 64, 3rd Revised Leaf No. 16. Tariff excerpt included as Pike Exhibit 5.¹

12. Thus, by regulation and Pike's tariff, Complainant is required to pay for the costs to move the pole.

13. Pike has provided Complainant with an estimate on August 26, 2025 and again, on this date by service of this pleading and Pike's Answer and New Matter, which is attached hereto as Pike Exhibit 3.

14. The Tariff is specific that the pole will only be moved where possible and after Complainant pays for costs of relocation. Granting the relief Complainant seeks to order Pike to relocate the pole at Pike's expense is thus prohibited by Pike's tariff. Pike has already provided Complainant with an estimate for relocation of the pole, on both August 26, 2025 and today upon service of this pleading and Pike's Answer and New Matter. Complainant is entitled to no relief as a matter of law and the Complaint should be dismissed.

¹ Pike Exhibits 3 and 5 are the only exhibits attached to these preliminary objections. The Exhibit numbers used match the exhibit numbering in the Answer and New Matter.

IV. THE COMMISSION LACKS JURISDICTION OVER THE SUBJECT MATTER OF THE COMPLAINT

15. The Complaint must be dismissed because it does not allege any violation of the Public Utility Code, a Commission regulation, or a Commission order. The Commonwealth Court has made clear that “in order for the PUC to sustain a complaint brought under [66 Pa.C.S. § 1501], the utility must be in violation of its duty under this section. Without such a violation by the utility, the PUC does not have the authority, when acting on a customer’s complaint, to require any action by the utility.” *West Penn Power Co. v. Pa. PUC*, 478 A.2d 947, 949 (Pa. Cmwlth. 1984).

16. Here, the Complainant identifies no violation of the Code, Commission regulations, or Commission orders. Instead, dismissal is warranted because: (A) the Commission lacks jurisdiction over property disputes, which is the gravamen of the Complaint and (B) the Commission lacks jurisdiction to adjudicate claims of municipal ordinance violations.

A. THE COMMISSION LACKS JURISDICTION OVER PROPERTY DISPUTES.

17. The Commission lacks jurisdiction to adjudicate Complainant’s allegations concerning easements or rights-of-way related to the placement of Pike electric distribution utility poles. *See* Complaint ¶4 (“[T]he company erected the pole ... without obtaining any right-of-way agreement [or] easement” and “This inconsistency underscores that the installation was improper [and] unsupported by right-of-way.”)

18. It is well established that the Commission lacks jurisdiction over private property disputes and may not adjudicate questions involving private property interests. *See Anne E. Perrige v. Metropolitan Edison Co.*, PUC Docket No. C-00004110 (Order entered July 11, 2003) (Commission had no jurisdiction to interpret the meaning of a written right-of-way

agreement); *Lou Amati/Amati Service Station v. West Penn Power Co. and Bell Atlantic-Pennsylvania, Inc.*, PUC Docket No. C-00945842 (Order entered October 25, 1995) (real property issues such as trespass and whether utility facilities are located pursuant to valid easements are within the exclusive jurisdiction of the Courts of Common Pleas); *Tod and Lisa Shedlosky v. Pennsylvania Electric Company*, PUC Docket No. C-20066937 (Order entered May 28, 2008).

19. The Public Utility Code authorizes the Commission to regulate public utilities and ensure safe and reasonable service; it does not authorize the Commission to resolve boundary or easement disputes. Those disputes belong exclusively in a court of general jurisdiction. *Feingold v. Bell of Pa.*, 383 A.2d 791 (Pa. 1977).

20. Here, Complainant alleges that Pike installed an electric distribution pole (“Subject Pole”) adjacent to his lot “without obtaining any right-of-way agreement, easement, municipal approval, or signed authorization.” Complaint ¶4. Accepting these arguments as true for the purposes of preliminary objections, the Complaint is fundamentally a property dispute concerning whether Pike holds a right-of-way or easement granting authority to place the Subject Pole.

21. Therefore, as the Complainant’s allegations ask the Commission to adjudicate property rights, they fall outside its jurisdiction. The Commission lacks statutory authority to interpret or enforce such rights and cannot grant the relief requested.

B. THE COMMISSION LACKS JURISDICTION TO ADJUDICATE CLAIMS OF VIOLATIONS OF MUNICIPAL ORDINANCES

22. The Complaint is also beyond the Commission’s jurisdiction because it alleges that the placement of the Subject Pole “violates the Matamoras Borough Code, § 105-8.” Complaint ¶4.

23. The Commission’s authority extends only to matters expressly delegated by the state legislature, and its jurisdiction must derive from the express language of its enabling legislation or from necessary implication therein. *Feingold*, 383 A.2d at 794.

24. While the Commission is responsible “for prescribing rules and regulations governing reasonableness, adequacy and sufficiency of service,” a complaint can only be sustained if the Commission finds that the utility violated its duty under the Code, the Commission’s regulations or a commission order. *T.W. Phillips Gas & Oil Co. v. Peoples Natural Gas Co.*, 492 A.2d 776, 779 (Pa. Cmwlth. 1985) (citing *Behrend v. Bell Telephone Co. of Pa.*, 243 A.2d (Pa. 1968)).

25. Consistent with this limitation, the Commission has explained that it “generally lacks jurisdiction to adjudicate claims regarding violations of municipal ordinances.” *Rulemaking Regarding Hazardous Liquid Pub. Util. Safety Standards at 52 Pa. Code Chapter 59*, 2024 Pa. PUC LEXIS 130, at *198 (Apr. 25, 2024).

26. Here, Complainant identifies no provision of the Public Utility Code, Commission regulation or order that Pike has violated. Instead, Complainant’s allegations claim that the Subject Pole’s location is “unlawful under the Borough ordinance.” Complaint ¶4.

27. According to the Complainant, the municipal code in question “expressly prohibits the setting or any pole or other object between the curblineline and the property line” without local government consent. Complaint ¶4. However, evaluating whether Pike complied with the Matamoras Borough Code would require the Commission to interpret and enforce municipal law, which is authority the Commission does not possess.

28. Even assuming arguendo that Pike had failed to comply with Matamoras Borough Code § 105-8, the Commission still could not grant the relief Complainant demands. The

Commission lacks authority to enforce local ordinances, to compel relocation of facilities based on municipal requirements, or to award damages tied to such allegations. See 66 Pa.C.S. § 1501; *West Penn Power Co.*, 478 A.2d 947 at 949.

29. Therefore, because the Complaint rests on alleged violations of a municipal ordinance, it raises issues over which the Commission has no jurisdiction.

V. **THE COMPLAINT IS LEGALLY INSUFFICIENT BECAUSE IT FAILS TO STATE A CLAIM UPON WHICH RELIEF CAN BE GRANTED – PIKE HAS NOT VIOLATED ANY APPLICABLE STANDARDS REGARDING POLE PLACEMENT**

30. The Complaint should be dismissed in its entirety because it seeks Commission interference in matters within utility managerial discretion that arise from the interpretation and application of a municipal ordinance. Complainant asks the Commission to order Pike to “[r]emove and relocate the [Subject Pole] to a lawful and appropriate location” and to require Pike to “comply fully” with local ordinances moving forward. Complaint ¶5. Even if Complainant’s allegations were accepted as true, this relief is legally unavailable because: (A) local ordinances cannot dictate the placement of utility infrastructure; and (B) the Commission does not direct the specific siting or configuration of electric distribution poles.

A. **LOCAL ORDINANCES DO NOT DICTATE UTILITY INFRASTRUCTURE PLACEMENT AS A MATTER OF LAW BECAUSE UTILITY INFRASTRUCTURE IS EXEMPT FROM LOCAL LAND USE REGULATION**

31. Complainant’s allegation that the Subject Pole violates Matamoras Borough Code § 105-8 should be dismissed because, as a matter of law, local ordinances cannot dictate the placement of public utility infrastructure. Even if the Commission had jurisdiction to adjudicate claims involving municipal ordinances, Borough Code § 105-8 does not validly apply to Pike.

32. Pike has the legal right to occupy the public right-of-way. 15 Pa. C.S. 1511(e)

33. The Municipalities Planning Code (“MPC”) provides that local zoning does not apply to public utility building if the PUC, after a hearing, finds that the building’s location is reasonably necessary for the convenience or welfare of the public. 53 P.S. § 10619. Courts have consistently interpreted this provision to mean that while utility buildings may require PUC review for exemption, non-building infrastructure such as poles, wires, and lines are categorically outside the reach of municipal land use regulation. See *South Coventry Twp. v. Phila. Elec. Co.*, 504 A.2d 368 (Pa. Cmwlth. 1986); *York Water Co. v. York*, 95 A. 396 (Pa. 1915); *Newtown Twp. v. Phila. Elec. Co.*, 594 A.2d 834 (Pa. Cmwlth. 1991), allocatur denied, 600 A.2d 542 (Pa. 1991).

34. Public utilities are not subject to local regulation of facility location because it conflict with the Commission’s jurisdiction and undermine the statewide public interest in consistent utility service. *Duquesne Light Co. v. Upper St. Clair Twp.*, 105 A.2d 287 (Pa. 1954). To the extent municipalities retain any authority affecting utility service, that authority is expressly subordinate to the Commission. 53 P.S. § 56579.32(b). Local ordinances that conflict with Commission regulations or orders are preempted and unenforceable. See *PECO Energy Co. v. Twp. of Upper Dublin*, 922 A.2d 996 (Pa. Cmwlth. 2007) (preempting township ordinance limiting tree pruning because it conflicted with Commission vegetation management requirements); see also *Duquesne Light Co.*, 105 A.2d at 292–93 (rejecting township zoning enforcement against transmission facilities approved by the Commission). Allowing municipalities to regulate utilities independently would create a “twisted and knotted” system of public utility regulation, undermining the welfare of the entire Commonwealth. *Cnty. of Chester v. Phila. Elec. Co.*, 218 A.2d 331, 333 (Pa. 1966).

35. Here, Complainant alleges that the Subject Pole was “unlawful” because Borough Code § 105-8 prohibits poles between the curblineline and the property line without Borough consent.

Complaint ¶4. That allegation, however, does not establish a viable claim. Even if the Borough withheld consent, Pennsylvania law makes clear that municipalities lack the authority to determine whether a utility may place its non-building infrastructure within a public right-of-way. See *Del. Riverkeeper Network v. Sunoco Pipeline*, 179 A.3d 670, 679 (Pa. Cmwlth. 2018) (“Pennsylvania courts consistently construct Section 619 narrowly and hold a township has no power to regulate a public utility by zoning ordinances with regard to uses and structures that are not buildings.”). As the MPC and subsequent case law confirm, poles are non-building utility infrastructure and thus fall outside the scope of local zoning regulation.

36. Therefore, as Complainant’s theory rests ensuring compliance with Borough Code § 105-8, it seeks relief under a standard that cannot lawfully be applied to utility infrastructure. The placement of poles is governed by the Public Utility Code and the Commission’s regulatory authority, not by municipal ordinances. Accordingly, Complainant’s reliance on § 105-8 fails as a matter of law, and the allegations premised on that ordinance must be dismissed.

B. THE COMMISSION DOES NOT DICTATE THE SPECIFIC PLACEMENT OF ELECTRIC DISTRIBUTION POLES

37. The Complaint’s request that the Commission order Pike to relocate the Subject Pole and guy wire, or to require a different service configuration, must be rejected because the Commission does not direct the specific placement or engineering design of electric distribution poles, which decision is left to the expertise and discretion of electric distribution companies. Thus, the Subject Pole’s location is not in violation of the Public Utility Code, a Commission regulation or order and there is no basis for the Commission to order any relief.

38. While the Commission has express regulations to review and approve the siting of high-voltage transmission lines, no comparable authority exists for distribution lines, which are not subject to Commission siting review. See 52 Pa. Code § 57.71. Accordingly, decisions

regarding the placement of distribution poles fall within the utility's expertise and managerial discretion.

39. Managerial discretion means the management of a public utility rests with the utility itself, and the Commission may not substitute its judgment for lawful management decisions absent a showing of abuse of discretion or arbitrary action. *Nat'l Fuel Gas Distrib. Corp. v. Pa. Pub. Util. Comm'n*, 464 A.2d 546, 559 (Pa. Cmwlth. 1983). As explained by the Pennsylvania Supreme Court this "management decision doctrine" provides that "it is not within the province of the Commission to interfere with the management of a utility unless an abuse of discretion or arbitrary action by the utility has been shown." *Pickford v. Pa. Pub. Util. Comm'n*, 4 A.3d 707, 715 (Pa. Commw. 2010) (citing *Pa. Pub. Util. Comm'n v. Pennsylvania Electric Co.*, 561 A.2d 1224, 1226–27 (Pa. 1989).

40. Here, Complainant objects to Pike's decision to "install a utility pole directly in front of" the property in question. Complaint ¶4. The Complainant further demands that Pike "remove or relocate" the guy wire and eliminate the "mid-span" service connection in favor of some other unspecified method. Complaint ¶5.

41. The relief Complainant seeks would require the Commission to step into the role of directing where poles, wires, or connections should be located even though the Commission has declined to do so through regulation. The Commission has placed such decisions within the expertise and managerial discretion of the utility. Complainant's preference for a different pole location fails to allege a violation of the Public Utility Code, Commission regulation or Order and thus there is no basis for the Commission to grant relief.

VI. REQUESTED RELIEF

WHEREFORE, Pike County Light & Power Company respectfully requests the Commission dismiss the Complaint with prejudice. To the extent the Complaint is not dismissed in its entirety, the Company requests the Commission specifically delineate what issues are set for hearing.

Respectfully submitted,

/s/Whitney E. Snyder

Whitney E. Snyder, Esq. (PA ID No. 316625)

Erich W. Struble, Esq. (PA ID No. 310768)

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Attorneys for Respondent

Pike County Light & Power Company

Dated: September 18, 2025

Pike Exhibit 3



Jesse Tashlik
208 Ave I
Matamoras, Pa.

Date 8-26-25

Dear Mr. Tashlik,

As per your request, we are providing you with a quote to relocate an existing pole owned by PCLP, pole number 39885-49924, which is located in front of your property, at 208 Ave I, Matamoras Borough, Pa.

The pole is located in the road right of way Matamoras Borough.

In order to accommodate your request this would involve replacing 2-40 foot poles, transferring 4 services and additional tree trimming. The work would also be pending approval of a neighbor who would have to agree to have an anchor guy installed in her front yard.

Material \$ 4779.50

Labor \$11,867.16

Tax \$ 998.79

Total \$17,645.45

Please make the check payable to Pike County Light and Power and include job number NB-0002455 if you wish to proceed with the work.

Sincerely,

A handwritten signature in cursive script that reads "Larry Gaffney". The signature is written in black ink and is positioned above the printed name and title.

Larry Gaffney
Supervisor of Operations

Pike Exhibit 5

RULES AND REGULATIONS

6. HOW TO OBTAIN SERVICE (Continued)

6.7 RELOCATION OR REMOVAL OF FACILITIES (Continued)

Direct Material Costs - The purchase price of materials used in performing the requested relocation or removal but not to include related stores expense. In computing these costs, proper allowance shall be made for unused materials, materials recovered from temporary structures and for discounts allowed and realized in the purchase of materials.

6.8 TAXES ON CONTRIBUTIONS IN AID OF CONSTRUCTION AND CUSTOMER ADVANCES

Any contribution in aid of construction, customer advance or other like amounts received from the customer which shall constitute taxable income as defined by the Internal Revenue Service will have the income taxes segregated in a deferred account for inclusion in rate base in a future rate case proceeding. Such income taxes associated with a CIAC or customer advance will not be charged to the specific contributor of the capital.

(Continued)

ISSUED: June 30, 2005 EFFECTIVE: September 1, 2005
ISSUED BY: John D. McMahon, President
Milford, Pennsylvania

RULES AND REGULATIONS**8. SERVICE CONNECTIONS****8.1 GENERAL:**

The Company will construct and maintain all overhead service connections from its lines adjacent to a customer's premise to the service entrance of the building or structure where service is to be metered. The Company will furnish at its expense one span of wire and one pole, with attachments if needed for such connection and such portion of the connection shall be the Company's property. Where additional poles and wires are required, the Company, in the interest of safe and efficient service, will install such poles and wires at the customer's expense and for his account. In such case the customer shall pay to the Company, in advance, the cost of such additional poles and wires as estimated by the Company. The customer, at his expense, in advance of the construction of such connection shall provide to the Company all necessary easements and rights of way to enable the Company to construct and maintain such connection.

8.2 LOCATION OF SERVICE WIRES, METER, ETC.:

As the point of entrance on the customer's building depends on the location of the distribution line, inquiry must always be made before the customer's wiring is commenced as to the point where the meter, or meters, will be located. The Company will designate by a suitable marker the proper point of attachment and meter location for service to be furnished. Such meter location shall be maintained by the customer in such a manner as to be readily acceptable to the Company representatives and free from excessive vibration or other detrimental conditions. General specifications regarding services and meters are available at Company offices.

8.3 OUTDOOR METERING:

The Company recommends outdoor metering for residential service and may require an approved outdoor meter installation when:

- (A) there is no suitable place inside to set the meter,
- (B) the building is occupied or open only part of the time,
- (C) free access cannot be had to the meter at all reasonable times, and
- (D) a Customer owns and maintains his private pole line.

ISSUED: April 15, 1999**EFFECTIVE:**

May 1, 1999

ISSUED BY: R. Lee Haney
Chief Financial Officer
Milford, Pennsylvania

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the foregoing document upon the parties, listed below, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a party).

VIA E-MAIL

Jesse Tashlik
130 Lewis Road
Milford, PA 18337
jtashlik@ptd.net

/s/ Whitney E. Snyder

Whitney E. Snyder

Erich W. Struble

Dated this 18th day of September, 2025