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December 3, 2025

VIA ELECTRONIC FILING

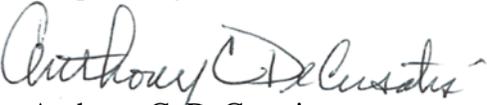
Nieves Abad
747 Delaware Street
Forest City, PA 18421

Re: Nieves Abad v. PPL Electric Utilities Corporation
Docket No. C-2024-3047163

Dear Mr. Abad:

Attached are the Objections of PPL Electric Utilities Corporation to the Interrogatories of Nieves Abad – Set VI in the above-referenced proceeding. Copies will be provided as indicated on the Certificate of Service.

Respectfully submitted,


Anthony C. DeCusatis

ADC/sa
Attachment

cc: Matthew L. Homsher, Secretary (*Filing Letter and Certificate of Service only*)
Certificate of Service

CERTIFICATE OF SERVICE

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 (relating to service by a participant).

VIA EMAIL AND FIRST-CLASS MAIL

Nieves Abad
747 Delaware Street
Forest City, PA 18421
Martjua3@aol.com

Dated: December 3, 2025


Anthony C. DeCusatis

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Nieves Abad,	:	
	:	
Complainant,	:	
	:	
v.	:	Docket No. C-2024-3047163
	:	
PPL Electric Utilities Corporation,	:	
	:	
Respondent.	:	

**OBJECTIONS OF PPL ELECTRIC UTILITIES CORPORATION
TO THE INTERROGATORIES OF NIEVES ABAD – SET VI**

I. INTRODUCTION

Pursuant to 52 Pa. Code §§ 5.321(c), 5.342(c) and 5.361(a), PPL Electric Utilities Corporation (“PPL Electric” or the “Company”), by and through its attorneys, hereby objects to the Interrogatories – Set VI of Nieves Abad, which were served on November 23, 2025, via electronic mail (“Set VI Interrogatories”) and contain Interrogatory Nos. 1-184. Because a number of the Set VI Interrogatories contain multiple subparts, the questions in Set VI total 229.

PPL Electric objects to the Set VI Interrogatories on the grounds that such Interrogatories:

- (1) Inquire into subjects stricken from this case by the *Order Granting in Part, and Denying in Part, the Preliminary Objections of PPL Electric Utilities Corporation to the Amended Complaint* (“Order on Preliminary Objections to the Amended Complaint”);
- (2) Repeat interrogatories, document requests, and requests for “written depositions” that were answered by the Company or determined to be objectionable by

Administrative Law Judge Alphonso Arnold III (the “ALJ”) before the ALJ issued the Order Granting Motion for Protective Order (“Protective Order”) on July 23, 2025, and, therefore, the Set VI Interrogatories should continue to be subject to the terms of the Protective Order;

- (3) Are an improper attempt to reverse the burden of proof and burden of production in this proceeding by asking the Company to produce the evidence to support the averments Complainant himself made in his Amended Complaint; and
- (4) Seek information that is not relevant to the issues in this proceeding as determined by the Order on Preliminary Objections to the Amended Complaint and are vague, overly broad, would require an unreasonable investigation, and would impose unreasonable burdens on the Company.

In addition to these Objections, the Company is filing a Motion to Reinstate the Protective Order Issued July 23, 2025 (“Motion to Reinstate Protective Order”).¹ These Objections and the Motion to Reinstate Protective Order deal with the same subject and explain why the Set VI Interrogatories are objectionable and why the Protective Order should be reinstated.

These Objections and the Motion to Reinstate Protective Order are intended to be read together and, therefore, the Company incorporates the material averments of the Motion to Reinstate Protective Order into these Objections as if set forth at length. Section II of the Motion to Reinstate Protective Order provides a procedural history that sets forth background information about this proceeding that is relevant to these Objections.

¹ As noted above, the ALJ issued the Protective Order on July 23, 2025. *See* Motion to Reinstate Protective Order, ¶¶ 1-2. At the November 4, 2025, Prehearing Conference in this case, Complainant represented to the ALJ and PPL Electric that he should be allowed additional discovery because he “would like to be able to know what Osmore has.” Tr. at 59, lines 7-10. Osmore Utilities Service Company (“Osmore”) is a contractor to PPL Electric that Complainant alleged had conducted inspections of the Company’s utility poles on his property. *See* Motion to Reinstate Protective Order, ¶ 3 and fn. 1. Based on the Complainant’s representations to the ALJ at the Prehearing Conference, the ALJ allowed additional discovery corresponding to the Complainant’s request.

A copy of Complainant's Set VI Interrogatories is attached to these Objections as Appendix A. Because of the number of Set VI Interrogatories and the length of each question, it would be unwieldy and unmanageable to attempt to repeat every question verbatim in these Objections. Therefore, each of the Set VI Interrogatories set forth in Appendix A is expressly incorporated by reference in each of the Company's specific Objections to which it applies. In addition, pursuant to 52 Pa. Code §5.342(c)(2), the specific "part" of each Interrogatory that is objectionable is identified and described herein and the grounds for objection are set forth. Pursuant to 52 Pa. Code §5.342(c)(3), the facts and circumstances that justify each objection are also set forth.

These Objections are organized under headings that correspond to the four grounds for objection set forth above. Under each heading, the specific interrogatories to the Company lodges objections are identified and described and the basis for each objection is discussed.

II. SPECIFIC OBJECTIONS

A. The Set VI Interrogatories inquire into subjects that were stricken from this case by the Order on Preliminary Objections to Amended Complaint

1. Set VI Interrogatory Nos. 103-121 seek information as to "other utility companies" facilities, including the "total load weight capability" for poles to which "other utility companies" have attached their wires. Set VI Interrogatory Nos. 136-139 and 142-147 seek information about facilities located in "public right of way" (i.e., not on the Property of Complainant). *See* Order on Preliminary Objections to Amended Complaint, p. 13 ("Complainant acknowledged that these poles are not on his property").

2. The Order on Preliminary Objections to the Amended Complaint (p. 13) held that Complainant "does not have standing to raise issues set forth in 'Argument #5' of the Amended Complaint and, therefore, struck those issues from this case.

3. Argument #5 (Paragraph 11 of the Amended Complaint) alleged that PPL Electric is violating service standards in the Pennsylvania Public Utility Code (“Public Utility Code”) and the Commission’s regulations by permitting telecommunication providers to attach their wires to the Company’s poles and further alleged that PPL Electric should deny telecommunications providers access to its poles located on public rights of way.

4. Thus, Complainant’s Set VI Interrogatories include numerous questions (those identified above, as well as others) pertaining to issues that are not part of this case, as the ALJ has previously ruled.

B. Large parts of Complainant’s Set VI Interrogatories are a wholesale repetition of interrogatories, document requests, and requests for “written depositions” that Complainant issued before the ALJ entered the Protective Order and, therefore, should continue to be subject to the terms of the Protective Order.

5. Many, if not most, of the 229 questions in the Set VI Interrogatories repeat discovery requests that Complainant issued before the Protective Order was entered. Those questions were either answered by PPL Electric or found objectionable by the ALJ’s prior rulings. *See* Protective Order, p. 3 (“discovery requests that are duplicative of previous requests that have already been responded to by PPL or that have already been addressed by me in addressing Motions to Compel filed by Mr. Abad”). Two of many examples illustrate this point.

6. The Set VI Interrogatories contain 31 references to information about PPL Electric’s “work orders” to repair damage to the Company’s facilities caused by Mr. Abad or the tree service he hired to work on the Property. *See, e.g.*, Set VI Interrogatory Nos. 1-5. A word search, using the search function on the Commission’s website, of the Complainant’s discovery

requests issued before the Protective Order was entered,² shows 112 references in those prior discovery requests to PPL Electric “work orders.”

7. Similarly, the Set VI Interrogatories contain 77 references to “inspect” and 46 references to “inspection” in relation to information sought by Complainant for facilities either on 837 Rear Capouse Avenue, Scranton, Pennsylvania (“Property”) or on public rights of way. A word search, using the search function on the Commission’s website, of the Complainant’s discovery requests issued before the Protective Order was entered, shows 278 references in those prior discovery requests to either “inspect” or “inspection” in relation to information sought by Complainant before the Protective Order was entered.³

8. The wholesale repetition of pre-Protective Order discovery requests that were either answered or the ALJ found objectionable should remain subject to the terms of the prior Protective Order and, therefore, should continue to be deemed improper, duplicative and unnecessary. Complainant is attempting to recycle discovery previously issued, answered, or properly stricken by the ALJ. The repetition of questions that were answered or ruled objectionable in the past is further evidence of the need to reinstate the terms of the Protective Order to shield PPL Electric from Complainant’s on-going “conduct regarding discovery” that the ALJ previously determined “resulted in unreasonable annoyance, burden, and expense towards PPL.” *See* Protective Order, p. 3.

² All of Complainant’s 1,250 discovery requests, covering 387 pages, were attached as Appendix B to the Company’s Motion for Protective Order that was posted on the Commission’s website on February 21, 2025. The search function on the Commission’s website enables searching key words in Appendix B.

³ As explained in PPL Electric’s Motion to Reinstate Protective Order at ¶¶ 13-14, the Company has agreed to produce the Osmose inspection and maintenance reports, which Complainant represented at the November 4, 2025, Prehearing Conference was the reason he was seeking additional discovery.

C. The Complainant's Set VI Interrogatories are an improper attempt to reverse the burden of proof in this complaint proceeding by asking the Company to produce the evidence to support the averments Complainant himself made in his Amended Complaint

9. Complainant has the burden of proof to establish, at a minimum, a prima facie case to support the averments of his Amended Complaint, as required by 66 Pa.C.S. §332(a) (the “proponent of a rule or order has the burden of proof”) and by the ALJ’s Order Clarifying Scope, p. 3 (“the burden of proof is on the Complainant”). Accordingly, Complainant has the burden to produce sufficient evidence to establish a prima facie case supporting the averments of the Amended Complaint. *See Porter Twp. Initiative v. E. Stroudsburg Area Sch. Dist.*, 44 A.3d 1201, 1208-1209 (Pa. Cmwlth. 2012) (the party with the burden of proof has the obligation to establish a prima facie case).

10. The Complainant is attempting to reverse the burden of proof in this complaint proceeding by demanding that Company produce the evidence to support the averments that Complainant himself made in his Amended Complaint. This is evident from, among various other interrogatories, Set VI Interrogatory Nos. 92-101 and 152-181.

11. Set VI Interrogatory Nos. 92-101 ask PPL Electric to produce evidence to demonstrate that the Company’s poles on the Property did not meet the standard for safe and reasonable service. It is not the Company’s obligation to produce evidence to support the averments Complainant made in his own Amended Complaint.

12. Set VI Interrogatory Nos. 152-181 ask PPL Electric produce evidence to demonstrate that the Company’s poles on the Property were subject to “decay” (Interrogatory Nos. 152-158) or lacked adequate strength for their intended purpose (Interrogatory Nos. 157-161). The Company does not have the obligation to produce evidence to support the averments Complainant made in his own Amended Complaint. Moreover, a number of these questions ask

for information that has no bearing on the issues in this case. *See, e.g.*, Set VI Interrogatory Nos. 72-76 (asking for the “diameter” of the poles when “first installed”).

13. The Complainant has the obligation to produce evidence to support the averments of the Amended Complaint. If those averments require the presentation of evidence based on “scientific or specialized knowledge,” the Complainant – not the Company – has the burden to produce that evidence. *See West Penn Power Company v. Pa. P.U.C.*, No. 1548 C.D. 2018 (Pa. Cmwlth. October 2, 2019), *slip op.* at 17 fn. 19 (holding that the complainant was obligated to present evidence to support the averments of his complaint and, if “expert testimony” was required to support those averments, the complainant needed to adduce the requisite testimony to establish a prima facie case).⁴

D. The Set VI Interrogatories seek information that is not relevant to the issues that are within the scope of this proceeding as set forth in the Order on Preliminary Objection to the Amended Complaint, are vague, overbroad, and would require an unreasonable investigation, and impose an unreasonable burden on the Company

14. In the Order on Preliminary Objections to Amended Complaint (p. 14), the ALJ held that only three issues were within the scope of this proceeding:

- (1) whether the Company complied with the Commission’s regulations and its tariff regarding the relocation of poles on the Complainant’s property;
- (2) whether the Company’s vegetation management activities on Complainant’s property were “reasonable” under the Public Utility Code and the Commission’s regulations; and
- (3) whether the Company or the Complainant was “responsible or accountable” for the incidents on April 13, May 25, and June 6, 2023, and caused power outages.

⁴ A copy of this decision is available on the Commonwealth Court’s website using the “search” function provided by the website.

15. As explained in Paragraph No. 20 of the Company's Motion to Reinstate Protective Order, the first issue identified above was rendered moot by PPL Electric's agreement to relocate its facilities off the Complainant's property at its own expense.

16. As to the third issue identified above, the ALJ noted in the Order on Preliminary Objections to the Amended Complaint (p. 13): "Complainant's *admission* that the wires collapsed following *his* tree removal activities impacts his ability to prevail on these claims" (emphasis added). For the same reason, the Company's "vegetation management activities on Complainant's property" (the second issue identified above) were not the real or proximate cause of the outages that occurred on April 13, May 25, and June 6, 2023.

17. The Set VI Interrogatories include many questions that are irrelevant to the three discrete issues the ALJ identified within the scope of this proceeding. Complainant's questions inquiring into areas that are irrelevant to the issues in this case are identified and discussed below. Many of these questions are also vague, over-broad, excessive, duplicative, would impose an unreasonable burden on the Company to answer, and would require an unreasonable investigation, as also discussed below.

18. The Set VI Interrogatories seek information concerning both current and former employees of the Company as well as employees of any "subcontractor," including contact information (*see* Interrogatory Nos 7-14). If provided, this information will undoubtedly trigger even more irrelevant, unnecessary, and burdensome discovery directed to those employees and "subcontractors" (if any) whose involvement is tangential, at most, to the issues identified by the ALJ as within the permissible scope of this case.

19. Set VI Interrogatory Nos. 27-28 seek detailed information about how PPL Electric assigns identification numbers to its utility poles. This kind of granular detail about pole

numbering is irrelevant to any issue in this case. Mr. Abad already has the identification numbers for the poles that are on his property, as evidenced by a number of interrogatories in Set VI and the averments of the Amended Complaint.

20. Set VI Interrogatory Nos. 29-32 seek information concerning “distances” of the Company’s utility poles from each other and from “a residential structure.” This kind of granular detail about pole “distances” is irrelevant to any issue in this case. Additionally, because there are no “structures” on Mr. Abad’s property, any questions about distances from “structures” are equally irrelevant or pertain to the Company’s facilities located in public rights of way, which are outside the scope of this proceeding. *See* Order on Preliminary Objections to Amended Complaint, p. 13.

21. Set VI Interrogatory Nos. 33-34 seek information about “PPL’s rules for utility maintenance” and “rules for utility pole inspection.” This level of granular detail is unnecessary and unreasonable, particularly since any prior “inspections” or “maintenance” are unrelated to the real and proximate cause of the damage to PPL Electric’s facilities on the Property, which was, by Complainant’s admission, his own tree removal activities on the Property. Additionally, as previously explained, the Company has agreed to produce the Osmose inspection and maintenance reports.

22. Set VI Interrogatory No. 35 asks whether the Company ever applied any “herbicide” on the Property. There is no issue in this case concerning the application of “herbicide” nor has Complainant, in either his original or Amended Complaint, alleged that the application of “herbicide” could raise concerns for him or others.

23. Set VI Interrogatory Nos. 36-40 ask the Company to review its: (1) Biennial Inspection, Maintenance, Repair and Replacement Plans; (2) Long-Term Infrastructure

Improvement Plans; (3) Annual Asset Optimization Plans; (4) Annual Reliability Reports; and (5) Quarterly Reliability Reports and detail any references therein to potential “improvements” to Company facilities on the Property. The plans and reports Complainant identified are extensive documents. Requiring the Company to review all of them to answer questions that are tangential, at most, to any issue in this case is unnecessary, unreasonable, and unduly burdensome. These interrogatories are also vague, overbroad, and would require an unreasonable investigation by the Company.

24. Set VI Interrogatory Nos. 41-45 seek information concerning Osmose inspections of poles on the Complainant’s property. As previously explained, the Company has agreed to produce Osmose inspection and maintenance reports.

25. Set VI Interrogatory Nos. 46-60 seek information about other prior inspections of the poles on the Complainant’s property. Because the Company has agreed to provide the inspection and maintenance reports for the most recent inspections conducted by Osmose, additional information about prior inspections serves no purpose and has no reasonable relationship to any issues in this case. This is particularly true because any prior inspections or maintenance are unrelated to the real and proximate cause of the damage to PPL Electric’s facilities on the Property, which was, by Complainant’s admission, his own tree removal activities on the Property. Additionally, questions about all prior inspections of poles on the Complainant’s property would require an unreasonable investigation to produce information that is not relevant.

26. Set VI Interrogatory Nos. 61-65 ask whether any poles had been “treated with a preservative or any chemical.” This issue is not relevant to any issues in this case. Whether or not the poles had been “treated” is unrelated to the real and proximate cause of the damage to

PPL Electric's facilities on the Property, which was, by Complainant's admission, his own tree removal activities on the Property.

27. Set VI Interrogatory Nos. 66-70 ask whether any poles had undergone an "infrared inspection." Set VI Interrogatory Nos. 71-75, ask if any poles had been inspected by "drone or helicopter." Whether or not the poles had been "inspected" by "infrared" scans or by "drone or helicopter" is a tangential issue at best. More importantly, it is unrelated to the real and proximate cause of the damage to PPL Electric's facilities, which was, by Complainant's admission, his own tree removal activities on the Property.

28. Set VI Interrogatory Nos. 76-86 seek information about prior "inspections" and prior vegetation cutting on Complainant's property. Because the Company has agreed to produce the Osmose inspection and maintenance reports, additional interrogatories seeking information about inspections predating those reports are irrelevant. They are also irrelevant because prior inspections and prior vegetation cutting on the Property are unrelated to the real and proximate cause of the damage to PPL Electric's facilities, which was, by Complainant's admission, his own tree removal activities on the Property. Additionally, interrogatories inquiring about all prior inspections would impose an unreasonable burden on the Company and require an unreasonable investigation.

29. Set VI Interrogatory Nos. 86 and 151 seek information about computer software programs used by PPL Electric. There is no conceivable basis upon which these inquiries are relevant to the claims and issues in this case.

30. Set VI Interrogatory No. 87 seeks five years of historical information on "customer interruptions for the utility poles and wires in this complaint." Five years of historical information is unnecessary and serves no reasonable purpose given the three discrete issues in

this case. Moreover, the property is unimproved and, therefore, would not have been affected by any prior alleged “interruptions.” Five years of historical records are also irrelevant to the issues in this case because the real and proximate cause of the damage to PPL Electric’s facilities during the three 2023 incidents identified in the Amended Complaint was, by Complainant’s admission, his own tree removal activities on the Property. Additionally, this interrogatory is vague, overbroad, would impose an unreasonable burden on the Company, and would require an unreasonable investigation.

31. Set VI Interrogatory Nos. 88-90 seek information about “bulletins, memorandums, or other instruction” to the Company’s employees. This information is not relevant to any issues in this case. Such information is also irrelevant because any such “bulletins, memorandums, or other instruction” to the Company’s employees was not the real and proximate cause of the damage to PPL Electric’s facilities during the three 2023 incidents identified in the Amended Complaint, which was, by Complainant’s admission, his own tree removal activities on the Property. Additionally, this interrogatory is vague, overbroad, would impose an unreasonable burden on the Company, and would require an unreasonable investigation.

32. Set VI Interrogatory No. 91 seeks “lighting [presumably meant to be ‘lightening’] or storm data taken by PPL” for the “utility poles and wires in this complaint.” Since the Amended Complaint included averments regarding poles on public rights of way, Interrogatory No. 91 seeks information outside the scope of this proceeding. Additionally, there is no averment in the Amended Complaint that lightening or storms were responsible for the damage to the Company’s facilities that occurred on April 13, May 25, and June 6, 2023. Rather, the real and proximate cause of the damage to PPL Electric’s facilities during the three 2023 incidents

identified in the Amended Complaint was, by Complainant's admission, his own tree removal activities on the Property. Additionally, this interrogatory is vague, overbroad, would impose an unreasonable burden on the Company, and would require an unreasonable investigation.

33. Interrogatory Nos. 92-96 seek information about the "type of wood" used in PPL Electric's poles on the Property. This information is not relevant to any issue in this case. The "type of wood" used in PPL Electric's utility poles was not responsible for the damage that occurred on April 13, May 25, and June 6, 2023. Rather, the real and proximate cause of the damage to PPL Electric's facilities during the three incidents identified in the Amended Complaint was, by Complainant's admission, his own tree removal activities on the Property.

34. Set VI Interrogatory Nos. 97-101 seek information about "how deep" the Company's poles on the Property were "buried beneath the surface of the ground." This kind detailed information is not relevant to any issue in this case. The depth at which the poles were buried was not responsible for the damage that occurred on April 13, May 25, and June 6, 2023. Rather, the real and proximate cause of the damage to PPL Electric's facilities during the three 2023 incidents identified in the Amended Complaint was, by Complainant's admission, his own tree removal activities on the Property.

35. Set VI Interrogatory No. 102 seeks information about "toxic substances, radiation or hazardous materials for the poles and wires in this complaint." Neither the original nor the Amended Complaint alleged that PPL Electric has applied or used any "toxic substances, radiation or hazardous materials" in, on or around the facilities on the Property. This question is irrelevant to any claims made, or issues raised, in the original or Amended Complaints in this case. In addition, it would require an unreasonable investigation by the Company to identify

every input to the entire supply chain for the material that composes or was used in or on poles, wires, and other facilities on Complainant's property.

36. As previously explained in Section VI.A. (¶¶ 1-4), *supra*, Set VI Interrogatory Nos. 103-121, 136-139, and 142-147 seek information relating to claims and issues that were stricken from this case by the Order on Preliminary Objection to the Amended Complaint. Therefore, those interrogatories clearly inquire into areas that are not relevant to any issues in this case.

37. Set VI Interrogatory No. 122 seeks information about utility poles that were "previously used" but had been "retired." Inquiries regarding utility poles that were retired in the past is far outside the bounds of relevance to any issue in this case.

38. Set VI Interrogatory No. 140 seeks information about poles that Mr. Abad damaged and had to be replaced, including whether PPL Electric still has "possession" of the old poles that he damaged and how the Company may have disposed of them. These inquiries are not relevant to the issues in this case.

39. Set VI Interrogatory No. 148 seeks "records" from the Company's "work and asset management system (WAM)" that "kept track of work done on distribution utility poles and wires" on the Property. This type of granular detail about historical records that may exist on PPL Electric's "work and asset management system" is not relevant to any issues in this case, would require an unreasonable investigation, and would impose an unreasonable burden on PPL Electric to produce information with no material bearing on the claims or issues defined in the Order on Preliminary Objections to Amended Complaint (p. 14).

40. Set VI Interrogatory No. 149 seeks information concerning a call Complainant alleges he made to PPL Electric's call center on April 26, 2023, including detailed information

about how that call was handled, who addressed Mr. Abad’s request, any work orders assigned, and the “employees/contractors” who handled the request. Upon information and belief,⁵ the Complainant did not own the property at 837 Rear Capouse Avenue, Scranton, Pennsylvania on April 26, 2023. The Company would not de-energize facilities – and interrupt service to other customers – based on a relocation request from someone who did not even own the property on which he asked the Company to de-energize and relocate those facilities. Additionally, providing detailed information about a single call to the Company’s call center imposes an unreasonable burden on the Company with no credible relationship to the claims and issues in this case.

41. As previously explained in Section IV.C., *supra*, the Set VI Interrogatory Nos. 92-101 and 152-181 seek to reverse the burden of proof and the burden of production in this case by asking the Company to produce evidence to support the averments made by the Complainant himself in the Amended Complaint. For the reasons set forth in Section IV.C., those interrogatories are improper. The Complainant, not the Respondent, has the obligation to present the evidence to establish a prima facie case based on the averments in the Amended Complaint.

42. Set VI Interrogatory No. 182 seeks information and “documents” about “input” to PPL Electric’s “Mobile Operations Management Software (MOM)” that was added by any “employee” or “subcontractor.” This information is not relevant to the issues in this case. It is also completely unbounded by any reasonable criteria and, therefore, is overly broad, vague, would impose an unreasonable burden on the Company, and would require an unreasonable investigation.

⁵ In its Set I Interrogatories to Complainant, the Company asked him to provide the date and a copy of the deed by which he acquired title to the property at 837 Rear Capouse Avenue, Scranton, Pennsylvania. Complainant objected to those interrogatories. However, the Company has reason to believe that he was not deeded the Property until after April 26, 2023.

43. Set VI Interrogatory No. 183 is similar to Interrogatory No. 182 except that it is even broader. This interrogatory asks for “data” that any “employee” or “subcontractor” of the Company may have “input” into “any other software management system” to “take notes or input data.” This information is not relevant to the issues in this case. It is also completely unbounded by any reasonable criteria and, therefore, is vague, overly broad, would impose an unreasonable burden on the Company, and would require an unreasonable investigation.

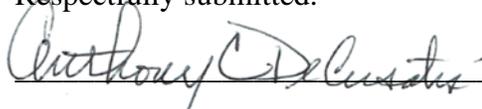
44. Set VI Interrogatory No. 184 seeks “all documentation from subcontractors” about the Company’s facilities on Complainant’s property. This interrogatory is, on its face, overbroad, seeks information that has no reasonable or focused relationship to the issues in this case, would require an unreasonable investigation by the Company, and would impose an unreasonable burden to produce information and “documentation” of no discernible import to the claims and issues in this case.

(Continued on next page)

III. CONCLUSION

WHEREFORE, PPL Electric objects to Set VI Interrogatory Nos. 1-184 issued by Complainant on November 23, 2025, on the grounds set forth in detail above. PPL Electric reserves the right to object to any future discovery requests, including instructions and definitions contained therein.

Respectfully submitted.



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Counsel for PPL Electric Utilities Corporation

Dated: December 3, 2025

APPENDIX A

Interrogatories – Set VI of Nieves Abad to PPL Electric Utilities Corporation

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

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

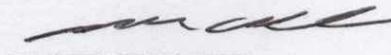
To Whom This May Concern,

I am enclosing herein one copy of Certificate Of Service evidencing the service Complainant's Interrogatories Set VI.

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

Thank you for your cooperation.

Respectfully Yours,



CC:
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Rosemary Chiavetta
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Pennsylvania Public Utility Commission
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CERTIFICATE OF SERVICE

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

C-2024-3047163

Dear Secretary Of Commission:

Attached for answer is Interrogatories Set VI served Upon Respondent by Nieves Abad in the Above-referenced proceeding. Copies will be provided as indicated on the Certificate of Service.

I, Nieves Abad, hereby certify that I served Interrogatories Set VI to the Respondent via certified mail this 24th Day of November, 2025 addressed as follows:

CC:

Devin T. Ryan
Principal
Post & Schell, P.C.
One Oxford Centre
301 Grant Street, Suite 3010
Pittsburgh, PA 15219
Phone: (717) 612-6052
Email: dryan@postschell.com

Erin R. Kawa
Post & Schell, P.C.
17 North Second Street
12th Floor
Harrisburg, PA 17101
717-612-6057 (Phone)
EKawa@PostSchell.com

Anthony C. DeCusatis
Counsel
Energy & Utilities
Harrisburg, PA
Phone: 717-612-6021
Fax: 717-291-1609
adecusatis@postschell.com

Respectfully Submitted,



Nieves Abad
747 Delaware St
Forest City pa 18421
631.575.2248
Dated-11/24/25

631.575.2248
Marjpa3@aol.com
Dated-11/24/25

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

Nieves Abad
(Pro-Se)

Complainant

CERTIFICATE OF SERVICE

VS

PPL Electric Utilities Corporation

C-2024-3047163

Respondent

CERTIFICATE OF SERVICE

I, Nieves Abad, hereby certify that I served Interrogatories Set VI to the Respondent via certified mail this 24th Day of November, 2025 addressed as follows;

Respectfully Submitted,



Nieves Abad
747 Delaware St
Forest City PA 184211
631.575.2248
Martjua3@aol.com
Dated-11/24/25

CC:

Devin T. Ryan
Principal
Post & Schell, P.C.
One Oxford Centre
301 Grant Street, Suite 3010
Pittsburgh, PA 15219
Phone: (717) 612-6052
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BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

Nieves Abad
(Pro-Se)

Complainant

Interrogatories Set VI

VS

PPL Electric Utilities Corporation

C-2024-3047163

Respondent

INTERROGATORIES SET VI PROPOUNDED UPON RESPONDENT

Demand is hereby made by Complainant, Nieves Abad, to the Respondent, PPL Utilities Corporation for full and complete answers, under oath or certification to the following Interrogatories within the time and in the manner prescribed by the rules of this Commission. You are required to file Answers to the following Interrogatories within twenty days (20) days after service upon you pursuant to Pennsylvania Title 52 Chapter 5 Code 5.341, service hereof is made upon you and you are notified that your answers, duly executed and sworn, must be entered after the corresponding numbered Interrogatory or part thereof, attaching such additional pages as may be required for complete answers. Complainant further requests Respondent to produce certain documents as set forth herein for purposes of inspection or copying pursuant to Pa.R.C.P. 4009, and upon consent of Respondent. These Interrogatories are continuing in nature. If the responses to the questions change or the Respondent becomes aware of new information, there is an obligation to supplement the responses. Failure to do so may result in the imposition of sanctions.

1. Missing work orders, customer data, forestry department and missing employee info

1. Please provide the information for Work order # 327197674 made on or about 3/29/23.

A. Is this work order # 327197674 made on or about 03/29/2023 cross referenced in another work order? If yes please provide this work order number. If no please provide the information for work order# 327197674 on or about 03/29/2023.

B. Do you not have any information on work order # 327197674 made on or about 03/29/2023? If not, please explain why not.

C. Please provide the account contact history for this work order # 327197674 made on or about 03/29/2023. If not please explain why or why not.

2. Please provide the information for Work order # 58719381 made on or about 04/03/2023.

A. Is this work order #58719381 made on or about 04/03/2023 cross referenced in another work order? If yes please provide this work order number. If no please provide the information for work order# 58719381 on or about 04/03/2023.

B. Do you not have any information on work order # 58719381 made on or about 04/03/2023? If not please explain why or why not.

C. Please provide the account contact history data for this work order # 58719381 made on or about 04/03/2023. If not please explain why.

3. Please provide the information for Work order # 58720380 made on or about 04/26/2023.

A. Is this work order # 58720380 made on or about 04/26/2023 cross referenced in another work order? If yes please provide this work order number. If no please provide the information for work order# 58720380 on or about 04/26/2023.

B. Do you not have any information on work order # 58720380 made on or about 04/26/2023? If not, please explain why or why not.

C. Please provide the account contact data for this work order # 58720380 made on or about 04/26/2023. If not, please explain why or why not.

4. Please provide the information for Work order # 58730565.made on or about 07/18/2023.

A. Is this work order # 58730565 made on or about 07/18/2023 cross referenced in another work order? If yes please provide this work order number. If no please provide the information for work order# 58730565 on or about 07/18/2023.

B. Do you not have any information on work order # 58730565 made on or about 07/18/2023? If not please explain why or why not.

C. Please provide the account contact data for this work order # 58730565 made on or about 07/18/2023.If no please explain why or why not.

5. All customer contact data was not provided between the months of 03/01/23 and 10/01/2023. Please provide all contact data you have between PPL and Nieves Abad between the above dates. Please provide copies of all documents.

A.

6. You have provided in the past a pole design map and several drawing designs of the poles in this complaint. Pole # 57316N46296 has not been on any of these designs. Please provide a pole design map with pole # 57316N46296 on the map.

A.

7. Information has been asked of former employee April Marie including last known position held, address, phone number, or contact information for April that PPL has stored in their records. Under the preservation of records section PPL is required to maintain this information. Please provide contact information PPL Human Resource Department has for former employee April Marie.

A.

8. Information has been asked of former employee Barbara Shumlas including last known position held, address, phone number or contact information for Barbara Shumlas that PPL has obtained in their records. Under the preservation of records section PPL is required to maintain this information. Please provide contact information PPL has for former employee Barbara Shumlas.

A.

9. On April 26, 2023, Complainant met with a male member of the forestry department of PPL on the property of 837 Rear Capouse, Scranton pa 18509. This person was driving a white toyota tacoma truck #605-0510 with company name environmental contractors inc. or ECI. On this date this PPL Employee reviewed the property, trees and poles. Please provide his name, job title and any documents, reports, pictures or other information he may have about this complaint.

A.

10. Who are the managers and employees of PPL's Forestry department at the time the incident in this complaint occurred that serves the property area. Please list name and job title and office address.

A.

10A Please list what information or provide documentation each employee has about this matter?

A.

11. Who is the manager and employee in charge of PPL's electrical safety department at the time the incident in this complaint occurred that serves the property area? Please list name and job title and office address.

A.

12. There was an accident involving damage to PPL utility poles and wires on 04/13/23 on the complainants property. Several PPL employees were dispatched to the property in this complaint. Service was lost to several customers during this incident. Please include each subcontractor, and employee's name and job title(s) that were involved with resolving this incident. Also include all reports, data, documents or any information about this incident from each employee.

A.

13. There was an incident involving damage to PPL utility poles and wires on 05/25/23 on the complainants property. Several PPL employees were dispatched to the property in this complaint. Service was lost to several customers during this incident. Please include the subcontractor and each employee's name and job title(s) that were

involved with resolving this incident. Also include all reports, data, documents or any information about this incident from each employee.

A.

14. There was an accident involving damage to PPL utility poles and wires on 6/6/23 on the complainants property. Several PPL employees were dispatched to the property in this complaint. Service was lost to several customers during this incident. Please include the subcontractor and each employee's name and job title(s) that were involved with resolving this incident. Also include all reports, data, documents or any information about this incident from each employee.

A.

15. On 04/13/23 What was the damage to PPL Utilities Categorized as? Please provide what the damage to the PPL Utilities was categorized as for this incident.

A.

16. Q. When this damage occurred to PPL utilities, a power outage occurred. What was this power outage categorized as ? Please provide the outage category of this incident.

A.

17. Q. On 04/13/23 how many residents were affected by this outage? Please provide all outage data for this incident.

A.

18. Q. On 4 /13/23 what was the duration of the outage for each residence? Please provide all outage data for this incident..

A.

19. Q.On 05/25/23 What was the damage to PPL Utilities Categorized as? Please provide what the damage to the PPL Utilities was categorized as for this incident.

A.

20. On 05/25/23 When this damage occurred to PPL utilities, a power outage occurred. What was this power outage categorized as ? Please provide all outage data for this event.Please provide all outage data for this incident.

A.

21. On 05/25/23 how many residents were affected byPlease provide all outage data for this event.Please provide all outage data for this incident. this outage? Please provide the outage category of this incident.

A.

22. On 05/25/23 what was the duration of the outage for each residence? Please provide all outage data for this incident..

A.

23. On 06/6/23 What was the damage to PPL Utilities Categorized as? Please provide what the damage to the PPL Utilities was categorized as for this incident.

A.

24. Q.On 06/6/23 When this damage occurred to PPL utilities, a power outage occurred. What was this power outage categorized as ?

A.

25. Q.On 06/6/23 how many residents were affected by this outage? Please provide the outage category of this incident.

A.

26. Q.On 06/6/23 what was the duration of the outage for each residence? Please provide the outage category of this incident.

A.

2. Utility Pole/Wire Distances Information on Safety Inspection and Maintenance

27. Q.When replacing utility pole # 57334N42685 on 4/13/23 the old utility pole ID is the same as the new utility pole ID number. Why wasn't the new utility pole assigned a new number?

A.

28. Q.When replacing utility pole # 57327N46297 on 4/13/23 the old utility pole ID is the same as the new utility pole ID number. Why wasn't the new utility pole assigned a new number?

A.

29. Q.It has been asked the exact distance of pole # 57320N46302 from 20 Amity Court Scranton PA 18509. Does PPL know the exact distance from the utility pole to 20 Amity Court Scranton PA 18509 . Please list the distance if you have this information. If not explain why PPL does not have this information in its records.

A.

30. Q.It has been asked the exact distance of pole # 57327N46297 from 20 Amity Court Scranton PA 18509. Does PPL know the exact distance from the utility pole to 20 Amity Court Scranton PA 18509 ? If not, please explain why PPL does not record this data.

A.

31. Q.It has been asked the exact distance of utility wires between pole #'s 57320N46302 and 57327N46297 at 20 Amity Court Scranton PA 18509. Does PPL know the exact distance from the utility wires to 20 Amity Court Scranton PA 18509 ? If not, please explain why PPL does not record this data.

A.

32. Q.What are PPL's rules for distance to a utility pole from a residential structure? Please provide PPL's rules on distance of a utility pole to a residential structure. Please include the rules, letters/memorandums to PPL employees or any other documentation PPL has on this subject.

A.

33. Q.What are PPL's rules for utility pole maintenance? Please provide PPL's rules of utility pole maintenance. Please include any biennial reports, memorandum letters, or any other documentation on this subject.

A.

34. Q.What are PPL's rules for utility pole inspection? Please provide PPL's applicable electrical safety rules that pertain to utility pole inspection. Please include the rules, letters/memorandums to PPL employees or any other documentation PPL has on this subject.

A.

35. Q.Has a herbicide application been applied in or around the PPL alleged right of way on the complainants property?

A.

36. Q.When submitting PPL's Biennial Inspection, Maintenance, Repair and Replacement plan to the public utilities commission what years plans involved improvements to the PPL right of way for PPL's distribution system through the property of the complainant?

A.

37. Q.When submitting PPL's Long Term Infrastructure Improvement Plan to the Public Utilities Commission what years plans involved improvements to the PPL right of way for PPL's distribution system through the property of the complainant?

A.

38. Q.When submitting PPL's Annual Asset Optimization Plan to the Public Utilities Commission what years plans involved improvements to the PPL right of way for PPL's distribution system through the property of the complainant?

A.

39. Q.When submitting PPL's Annual Reliability Report to the Public Utilities Commission what years plans involved improvements to the PPL right of way for PPL's distribution system through the property of the complainant?

A.

40. Q.When submitting PPL's Quarterly Reliability Report to the Public Utilities Commission what quarter plan involved improvements to the PPL right of way for PPL's distribution system through the property of the complainant.

A.

41. Q.When has OSMOSE inspected and/or maintained Pole #57334N42685?
Please list the person who inspected the pole, dates, times, findings,

repairs, recommendations, load testing, core testing or any other testing, or documentation for the pole's service life.

A.

42. Q. When has OSMOSE inspected and/or maintained Pole #57339N46273?

Please list the person who inspected the pole, dates, times, findings, repairs, recommendations, load testing, core testing or any other testing, or documentation for the poles service life.

A.

43. Q. When has OSMOSE inspected and/or maintained Pole #57327N46297?

Please list the person who inspected the pole, dates, times, findings, repairs, recommendations, load testing, core testing or any other testing, or documentation for the poles service life.

A.

44. Q. When has OSMOSE inspected and/or maintained Pole #57320N46302?

Please list the person who inspected the pole, dates, times, findings, repairs, recommendations, load testing, core testing or any other testing, or documentation for the poles service life.

A.

45. Q. When has OSMOSE inspected and/or maintained Pole # 57316N46296?

Please list the person who inspected the pole, dates, times, findings, repairs, recommendations, load testing, core testing or any other testing, or documentation for the poles service life.

A.

46. Q.Has any other company inspected and/or maintained pole # 57334N42685 during the service life of the pole? Please list the person who inspected the pole, dates, times, findings, repairs, recommendations, load testing, core testing, or any other testing, documentation. If not, please explain why not.

A.

47. Q.Has any other company inspected and/or maintained pole # 57339N46273 during the service life of the pole? Please list the person who inspected the pole, dates, times, findings, repairs, recommendations, load testing, core testing, or any other testing, documentation. If not, please explain why not.

A.

48. Q.Has any other company inspected and/or maintained pole # 57327N46297 during the service life of the pole? Please list the person who inspected the pole, dates, times, findings, repairs, recommendations, load testing, core testing, or any other testing, documentation. If not, please explain why not.

A.

49. Q.Has any other company inspected and/or maintained pole # 57320N46302 during the service life of the pole? Please list the person who inspected the pole, dates, times, findings, repairs, recommendations, load testing, core testing, or any other testing, documentation. If not, please explain why not.

A.

50. Q.Has any other company inspected and/or maintained pole # 57316N46296 during the service life of the pole? Please list the person who inspected the pole, dates,

times, findings, repairs, recommendations, load testing, core testing, or any other testing, documentation. If not, please explain why not.

A.

51. Q.Has PPL inspected and/or maintained pole # 57334N42685 during the service life of the pole? Please list the person who inspected the pole, dates, times, findings, repairs, recommendations, load testing, core testing or any other testing, documentation. If not, please explain why not.

A.

52. Q.Has PPL inspected and/or pole # 57339N46273 during the service life of the pole? Please list the person who inspected the pole, dates, times, findings, repairs, recommendations, load testing, core testing or any other testing, documentation. If not, please explain why not.

A.

53. Q.Has PPL inspected and/or maintained pole # 57327N46297 during the service life of the pole? Please list the person who inspected the pole, dates, times, findings, repairs, recommendations, load testing, core testing or any other testing, documentation. If not, please explain why not.

A.

54. Q.Has PPL inspected and/or maintained pole # 57320N46302 during the service life of the pole? Please list the person who inspected the pole, dates, times, findings, repairs, recommendations, load testing, core testing or any other testing, documentation. If not, please explain why not.

A.

55. Q.Has PPL inspected and/or maintained pole # 57316N46296 during the service life of the pole? Please list the person who inspected the pole, dates, times, findings, repairs, recommendations, load testing, core testing or any other testing, documentation.If not, please explain why not.

A.

56. Q.Was a visual inspection done by any PPL Employee during the service life of pole # 57334N42586 please list the date, the PPL employee, explain the employees findings, and any documentation they may have submitted. If not, please explain why not.

A.

57. Q.Was a visual inspection done by any PPL Employee during the service life of pole # 57339N46273? Please list the date, the PPL employee, explain the employees findings, and any documentation they may have submitted. If not, please explain why not.

A.

58. Q.Was a visual inspection done by any PPL Employee during the service life of pole # 57327N46297? Please list the date, the PPL employee, explain the employees findings, and any documentation they may have submitted. If not, please explain why not.

A.

59. Q.Was a visual inspection done by any PPL Employee during the service life of pole # 57320N46302? Please list the date, the PPL employee, explain the employees

findings, and any documentation they may have submitted. If not, please explain why not.

A.

60. Q. Was a visual inspection done by any PPL Employee during the service life of pole # 57316N46296? Please list the date, the PPL employee, explain the employees findings, and any documentation they may have submitted. If not, please explain why not.

A.

61. Q. Was pole #57334N42586 ever treated with a preservative or any chemical to increase the pole service life? If so, list the date the person applied the chemical, what chemical was used, what exact products were in this chemical and any studies of the effect of this chemical or product used to preserve the pole to the public health. If not, please explain why not.

A.

62. Q. Was pole # 57339N46273 ever treated with a preservative or any chemical to increase the pole service life? If so, list the date the person applied the chemical, what chemical was used, what exact products were in this chemical and any studies of the effect of this chemical or product used to preserve the pole to the public health. If not, please explain why not.

A.

63. Q. Was pole #57327N46297 ever treated with a preservative or any chemical to increase the pole service life? If so, list the date the person applied the chemical, what chemical was used, what exact products were in this chemical and any studies of the

effect of this chemical or product used to preserve the pole to the public health. If not, please explain why not.

A.

64. Q. Was pole # 57320N46302 ever treated with a preservative or any chemical to increase the pole service life? If so, list the date the person applied the chemical, what chemical was used, what exact products were in this chemical and any studies of the effect of this chemical or product used to preserve the pole to the public health. If not, please explain why not.

A.

65. Q. Was pole # 57316N46296 ever treated with a preservative or any chemical to increase the pole service life? If so, list the date the person applied the chemical, what chemical was used, what exact products were in this chemical and any studies of the effect of this chemical or product used to preserve the pole to the public health. If not, please explain why not.

A.

66. Q. Was an infrared inspection done for pole # 57334N42586 or utility wires attached to this pole during the poles life? Please explain why or why not. Please enclose all records.

A.

67. Q. Was an infrared inspection done for pole # 57339N46273 or utility wires attached to this pole during the poles life? Please explain why or why not. Please enclose all records.

A.

68. Q. Was an infrared inspection done for pole # 57327N46297 or utility wires attached to this pole during the poles life? Please explain why or why not. Please enclose all records.

A.

69. Q. Was an infrared inspection done for pole # 57320N46302 or utility wires attached to this pole during the poles life? Please explain why or why not. Please enclose all documents.

A.

70. Q. Was an infrared inspection done for pole # 57316N46296 or utility wires attached to this pole during the poles life? Please explain why or why not. Please enclose all documents.

A.

71. Q. Was an inspection done by drone or helicopter for pole # 57334N42586 or utility wires attached to this pole during the poles life? Please explain why or why not. Please enclose all documents.

A.

72. Q. Was an inspection done by drone or helicopter for pole # 57339N46273 or utility wires attached to this pole during the poles life? Please explain why or why not. Please enclose all documents.

A.

73. Q. Was an inspection done by drone or helicopter for pole # 57327N46297 or utility wires attached to this pole during the poles life? Please explain why or why not. Please enclose all documents.

A.

74. Q.Was an inspection done by drone or helicopter for pole # 57320N46302 or utility wires attached to this pole during the poles life? Please explain why or why not. Please enclose all documentation.

A.

75. Q.Was an inspection done by drone or helicopter for pole # 57316N46296 or utility wires attached to this pole? Please explain why or why not. Please enclose all documents.

A.

76. Q.Has pole # 57334N42586 failed inspection? If so, please list what dates, the person's name who failed the pole and any documents related to a failed inspection of this pole. If not, please explain why not.

A.

77. Q.Has pole #57339N46273 failed inspection? If so, please list what dates, the person's name who failed the inspection and any documents related to a failed inspection of this pole.If not, please explain why not.

A.

78. Q.Has pole #57327N46297 failed inspection? If so, please list what dates, the person's name who failed the pole and any documents related to a failed inspection of this pole.If not, please explain why not.

A.

79. Q.Has pole # 57320N46302 failed inspection? If so, please list what dates, the person's name who failed the pole and any documents related to a failed inspection of this pole.If not, please explain why not.

A.

80. Q.Has pole #57316N46296 failed inspection? If so, please list what dates, the person's name who failed the pole and any documents related to a failed inspection of this pole.If not, please explain why not.

A.

81. Q.How many times has vegetation been cut around pole # 57334N42586 during the service life of this pole? Please include the date, the name of the person who cut the vegetation management, what work was performed and any documents.

A.

82. Q.How many times has vegetation been cut around pole # 57339N46273 during the service life of this pole? Please include the date, the name of the person who cut the vegetation management, what work was performed and any documents.

A.

83. Q.How many times has vegetation been cut around pole # 57327N46297 during the service life of this pole? Please include the date, the name of the person who cut the vegetation management, what work was performed and any documents.

A.

84. Q.How many times has vegetation been cut around pole # 57320N46302 during the service life of this pole? Please include the date, the name of the person who cut the vegetation management, what work was performed and any documents.

A.

85. Q.How many times has vegetation been cut around pole # 57316N46296 during the service life of this pole? Please include the date, the name of the person who cut the vegetation management, what work was performed and any documents.

A.

86. Q.Have you used a program to analyze the service performance of the utility poles and wires in this complaint. If so, what software do you use? Please provide the documents and the data of service performance since keeping track.

A.

87. Q.Please provide five years or historical records of customer interruptions for the utility poles and wires in this complaint.

A.

88. Q.Has there been any bulletins, memorandums, or any other instruction to employees in this matter regarding pole maintenance for the poles & utilities in this complaint. Please include any documents regarding pole maintenance instruction given to PPL employees regarding the five poles in this complaint.

A.

89. Q.Has there been any bulletins, memorandums, or any other instruction to employees in this matter regarding pole inspection. Please include any documents regarding pole maintenance instructions given to PPL employees regarding matters that affect the PPL owned utilities in this complaint.

A.

90. Q.Is there any bulletin or memorandums of general instruction issues by PPL to its employees pertaining to changes in maintenance, inspection, construction, engineering or any other policy that has affected the utility poles and wires in this complaint for the service life of each pole that is not privileged?

A.

91. Q.Is there any lighting or storm data taken by PPL regarding the utility poles and wires in this complaint for the service life of these poles. If yes, please provide. If not, please explain why not.

A.

92. Q.What type of wood is pole # 57334N42586 made from?

A.

93. Q.What type of wood is pole # 57339N46273 made from?

A.

94. Q.What type of wood is pole # 57327N46297 made from?

A.

95. Q.What type of wood is pole # 57320N46302 made from?

A.

96. Q.What type of wood is pole # 57316N46296 made from?

A.

97. Q.How deep is pole # 57334N42586 buried beneath the surface of the ground?

A.

98. Q.How deep is pole # 57339N46273 buried beneath the surface of the ground?

A.

99. Q.How deep is pole # 57327N46297 buried beneath the surface of the ground?

A

100. Q.How deep is pole # 57320N46302 buried beneath the surface of the ground?

A.

101. Q.Was concrete or any other substance used when these poles were set in the ground. If so please explain how much concrete. If not, please explain why not.

A.

102. Q.Is there any toxic substances, radiation or hazardous materials for the utility poles and wires in this complaint. Please explain and list each material.

A.

103. Q.Does PPL inspect Utility wires from other utility companies that are placed on PPL owned Utility poles in this complaint? Please explain why or why not. If yes please any reports for the utilities in this complaint.

A.

104. Q.Does PPL receive maintenance reports of utility wires that are owned by other utility companies for utility wires placed on PPL owned Utility poles in this complaint? Please explain why or why not. If yes, please include any reports for the poles in this complaint.

A.

105. Q.Does PPL receive inspection reports on utility wires that are owned by other utility companies for utility wires placed on PPL owned Utility poles in this complaint? Please explain why or why not. If,yes please include any reports for the poles in this complaint.

A.

106. Q.What are PPL's rules for oversight on each utility company's utility wires placed on PPL owned poles in this complaint.

A.

107. Q.Does PPL require any other utility companies to submit inspection, maintenance or replacements reports to PPL, for utility wires that are placed on PPL owned utility poles in this complaint? Please explain why or why not. If yes, please include any reports for the poles in this complaint.

A.

108. Q.Does PPL require any other utility companies that have utility wires placed on PPL owned utility poles, to submit load testing reports to PPL for utility wires placed on utility poles in this complaint. If so please include, if not, please explain why not.

A.

109. Q.Does PPL keep track of the total load of each utility pole in this complaint with all companies' utility wires on them ? Please explain why or why not. If yes, please include any reports for the poles in this complaint.

A.

110. Q.What is the total load weight capability for pole # 57334N42685 ?

A.

111 Q.What is the total load weight capability for pole # 57339N46273 ?

A.

112. Q.What is the total load weight capability for pole # 57327N46297 ?

A.

113. Q.What is the total load weight capability for pole # 57320N46302 ?

A.

114. Q.What is the total load weight capability for pole # 57316N46296?

A.

115. Q.What is the current load weight of pole # 57334N42685 with all utility wires in place?

A.

116. Q.What is the current load weight of pole # 57339N46273 with all utility wires in place?

A.

117. Q.What is the current load weight of pole # 57327N46297 with all utility wires in place?

A.

118. Q.What is the current load weight of pole # 57320N46302 with all utility wires in place?

A.

119. Q.What is the current load weight of pole # 57316N46296 with all utility wires in place?

A.

120. Please list all utility companies that have utility wires attached to utility poles in this complaint?

A.

121. Q. Please explain what documents are required by PPL for each utility company to submit showing compliance with PPL's rules for use of its utility poles. Please include an example of documents a utility company needs to apply to PPL in order to install their utilities to a PPL owned utility pole. Also include an example of PPL approval for this application.

A.

122. Q. Please list all utility pole # that have been previously used on the complainants property by PPL, that may be retired and not in service anymore?

A.

123. Q. During discovery it was determined that PPL owned utility pole # 57316N46296 and is on the complainants property. On the drawing design of the PPL owned Utilities on the complainants property provided by PPL, This utility pole is not on the map provided.

A. Will the new pole # 57316N46296 problem be fixed by PPL? Please explain why or why not.

B. Will this problem be fixed in the system of PPL?

C. What are the procedures to fix this error?

D. Is this error documented when the corrections are made?

E. Please submit the utility pole data and information for pole # 57316N46296.

124. Q. Was pole # 57317N46297 replaced/retired by utility pole # 57316N46296 ?

A. Please list what date this pole was replaced?

125. Q.Pole # 57317N46297 does not exist on the property of Nieves Abad. Is this utility poles right of way between PPL and Real Estate Technology Corporation still applicable under Pennsylvania Law?

A.) Does PPL know that this utility pole is not in service anymore? Please explain why or why not.

A.

126. Q.The Right Of Way document for pole # 57317N46297 Between Real Estate Technology and Pennsylvania power and light company that PPL has submitted. Please explain where on this right of way document does it say the right of way is transferable to PPL from Pennsylvania power and lights?

A.)Is the Right of Way on this document transferable from Pennsylvania Power and Lights to PPL? Please explain why or why not.

127. Q.The Right Of Way document PPL has submitted for pole # 57317N46297 Between Real Estate Technology and Pennsylvania power and light company. Please explain where on this document does it say the right of way is transferable to a new property owner.

A.)Is the Right Of Way on this document transferable to the new owner Nieves Abad, please explain why or why not.

A.

128. Q.What is the distance vegetation must be cleared by PPL for the distribution utility poles and wires in an alleged PPL right of way for the property in this complaint?

A.

129. Q. In March through July of 2023, was vegetation clearances for the alleged right of way of utility poles owned distribution utility poles and wires in this complaint in compliance with standards set forth in PPL.s Please explain how it was or was not in compliance. Please also include all dates of non compliance.

A.) Was vegetation management clearance standards met during this period as required of an Electrical Distribution Company operating in the State of Pennsylvania?

130. Q.PPL electric has claimed in the answers to the complaint of Nieves Abad that pole # 57320N46302 was located in a public right of way. Please provide documentary evidence that pole # 57320N46302 is in a public right of way. If provided in discovery please explain what documentation you have disclosed. If you do not have this information please explain why not.

A.

131. Q.Please list how far from the property line of Nieves Abad Is pole # 57320N46302 placed in a public right of way? Please provide the exact measurements and if you don't have these measurements please explain why not.

A.) Does PPL know the exact coordinates such as the longitude and longitude location of pole # 57320N46302? Please explain why or why not. If yes, please include these coordinates.

A.

132. Q.Has pole # 57320N46302 been placed on the property of Nieves Abad? Please explain why or why not.

133. Q.Are there any internal notes regarding this complaint from PPL, PPL contractors or any PPL employees that are not privileged? Please list and give copies

and disclose all. If provided in discovery please explain what documentation you have disclosed. If you do not have this information please list the missing information and explain why it's missing.

A.

134. Q.Has PPL's and/or any one acting in PPL's behalf obtained from any witnesses or persons, including the parties to this action, and reports, statements, recordings, etc concerning the allegations found in this complaint that is not privileged. If so, please list each person and attach to your answer.

A.

135. Q.State whether PPL or any persons acting on PPL's behalf have prepared any charts, diagrams, photographs or videos pertaining in any manner to PPL Utility poles and wires in this complaint that are not privileged.

A. The name and address of the person making or prepare

B. The date and place made or prepared;

C. The objects or scenes depicted;

D. The name and address of the person having possession.

E. Attach a copy of the same to your answers hereto

136. Q.When erecting a new utility pole and/or utility wires next to a residential structure, does PPL follow the national residential code? If so please list what year codes you follow. If not please explain why PPL is exempt from following these codes.

A.

137. Q.When erecting a new utility pole and/or utility wires next to a residential structure, does PPL follow the international building code? If so, please list what year codes you follow. If not please explain why PPL is exempt from following these codes.

A.

138. When erecting a new utility pole and/or utility wires next to a residential structure, does PPL follow the international fire code? If so, please list what year codes you follow. If not please explain why PPL is exempt from following these codes.

A.

139. Q.When erecting a new utility pole and/or utility wires next to a residential structure, does PPL follow the NFPA 70? If so, please list what year codes you follow. If not please explain why PPL is exempt from following these codes.

A.

140. Q.On 4/13/23 Two Utility poles were damaged and needed replacing on the property in this complaint. Pole # 57327N46297 and 57334N42685. Does PPL still have possession of the old utility poles that were replaced? If not, how did PPL dispose of these Utility poles and what date.

A.

141. Q.What class distribution company is PPL Electric Utilities Corporation categorized by the State Of Pennsylvania?

A.

142. Q.Does PPL have an agreement with the City Of Scranton to place its utility poles in a public right of way? Please submit this agreement. If not please explain what gives PPL permission to place its poles and wires in a public right of way.

A.

143. Q.Does PPL have an agreement for safety standards for the utility poles and wires placed in a public right of way in the city of Scranton?

A.

144. Q. What are the City of Scranton's safety standards for PPL utility poles placed within city limits that are required of PPL.

A.

145. Q.Has PPL received any special zoning for utility poles and utility wires placed in the city limits. If yes, please provide copies of permits and the terms. If not, please explain why not.

A.

146. Q.Is there an exemption for PPL to follow city ordinances in the city of scranton? Please provide information on this exemption.

A.

147. Q.Does PPL have permission from the state of Pennsylvania to Use the City of Scranton's public right of way to place PPL utility poles and wires. If yes, please include this agreement. If no, explain and submit what agreements PPL has in place to place PPL utilities in a public right of way.

A.

148. Q.What records do you retain in your company's work and asset management system (WAM) where records were kept track of work done on distribution utility poles and wires in the PPL alleged right of way on the property of the complainant? Please include inspection, maintenance,vegetation management and any other documents you

may have for information on the utility poles and wires in this complaint. If no records were kept please explain why,

A.

149 Q. On 04/26/23, when Nieves Abad called into the PPL call center. He asked to drop and de-energize utility wires for tree cutting.

A. Who denied this request?

B. Who did this request get dispatched to?

C. What were the results of this work order?

D. What was the work order # for this request.

E. Is there any more documentation on this request?

F. Who is the employees/contractors who took this request?

150. Q. Are there any documents or other evidence you have not submitted due to them being privileged that I have requested from you? Please provide how many documents or evidence you are withholding and provide what category of privilege they fall under.

A.

151. Q. What contract based engineering software/or any other source that was used to determine the measurable decay for the remaining pole strength for the utility poles in this complaint.

A.

152. Q. What is the percentage of decay for pole #57334N42685 each of its inspection(s)?

A

153. Q. What is the percentage of decay for pole # 57339N46273 in each of its inspection(s)?

A.

154. Q. What is the percentage of decay for pole # 57327N46297 in each of its inspection(s)?

A.

155. Q.What is the percentage of decay for pole # 57320N46302 in each of its inspection(s)?

A.

156. Q.What is the percentage of decay for pole # 57316N46296 in each of its inspection(s)?

A.

157. Q.What is the remaining pole strength for pole # 57334N42685 in each inspection?

A.

158. Q.What is the remaining pole strength for pole # 57339N46273 in each inspection?

A.

159. Q.What is the remaining pole strength for pole # 57327N46297 in each inspection?

A.

160. Q.What is the remaining pole strength for pole # 57320N46302 in each inspection?

A.

161. Q.What is the remaining pole strength for pole #57316N46296 in each inspection?

A

162. Q.How tall is pole # 57334N42685?

A.

163. Q.How tall is pole # 57339N46273?

A.

164. Q.How tall is pole # 57327N46297?

A.

165. Q.How tall is pole # 57320N46302?

A.

166. Q. How tall is pole# 57316N46296?

A.

167. Q.What is the total diameter of pole # 57334N42685 when it was first installed?

A.

168. Q.What is the total diameter of pole # 57339N46273 when it was first installed?

A.

169. Q.What is the total diameter of pole # 57327N46297 when it was first installed?

A.

170. Q.What is the total diameter of pole # 57320N46302 when it was first installed?

A.

171. Q.What is the total diameter of pole # 57316N46296 when it was first installed?

A.

172. Q.What is the current total diameter of pole # 57334N42685?

A.

173. Q.What is the current total diameter of pole # 57339N46273?

A.

174. Q.What is the current total diameter of pole # 57327N46297?

A.

175. Q.What is the current total diameter of pole # 57320N46302?

A.

176. Q.What is the current total diameter of pole # 57316N46296?

A.

177. Q.Has a steel C TRUSS with bands been placed on pole # 57334N42685 for reinforcement?

A.What is the length and width of the C TRUSS?

B.Where is the C TRUSS positioned on the utility pole?

C.What gauge metal is the C TRUSS?

D. What type of metal is the C TRUSS?

178. Q.Has a steel C TRUSS with bands been placed on pole #57339N46273 for reinforcement?

A.What is the length and width of the C TRUSS?

B.Where is the C TRUSS positioned on the utility pole?

C.What is the length and width?

D. What type of metal is the C TRUSS?

179. Q.Has a steel C TRUSS with bands been placed on pole # 57327N46297 for reinforcement?

A.What is the length and width of the C TRUSS?

B.Where is the C TRUSS positioned on the utility pole?

C.What type of metal is the C TRUSS?

180. Q.Has a steel C TRUSS with bands been placed on pole # 57320N46302 for reinforcement?

A.What is the length and width of the C TRUSS?

B.Where is the C TRUSS positioned on the utility pole?

C.What type of metal is the C TRUSS?

181. Q.Has a steel C TRUSS with bands been placed on pole # 57316N46296 for reinforcement?

A.What is the length and width of the C TRUSS?

B.Where is the C TRUSS positioned on the utility pole?

C.What is the length and width?

182. Q.Has any employee of PPL or subcontractor input any data into the Mobile Operations Management Software (MOM) to take notes or input data? If so, please answer and include all documents that are not privileged. Please include any information regarding this incident that

you have submitted during discovery. If you have already included these documents in discovery please explain what documents you have included.

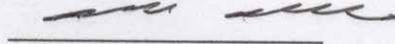
A.

183. Q.Has any employee of PPL or subcontractor input any data into any other software management system to take notes or input data? If so, please answer and include all documents that are not privileged. Please include any information regarding this incident that you have submitted during discovery. If you have already included these documents in discovery please explain what documents you have included.

184. Q.Please disclose all documentation from subcontractors about the distribution utility poles and wires and PPL alleged right of way on the property of Nieves Abad that are not privileged. Please include any information, pictures or documents regarding this incident that you have submitted during discovery. If you have already included these documents in discovery please explain what documents you have included.

A.

Respectfully Submitted,



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Dated-11/24/25

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