

May 2, 2026

***VIA ELECTRONIC FILING***

**Re: Mark Grosz v. PPL Electric Utilities Corporation**

**Docket No. C-2026-3061612**

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**Preliminary Objection Response Answer**  
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As a private citizen bringing this complaint, I find the responses, while probably normal in the legal world, very heavy handed and similar to the bullying tactics from utilities from my experiences at our municipal EAC, in my own complaints, and in requests for help I receive. I have no staff and no legal firm, and no legal counsel to define the obtuse legal terms that fill the responses. Should I take it as a sign of arrogance and bullying that while the PUC gave 20 days for a response it seems PPL Electric Utilities Corporation and Hayley E. Wilburn see it fit they will graciously give me 10 days? How does that set the tone of their Preliminary Objection document?

Although 7 clear points were listed in Section 4 of the complaint, no responses, technical or otherwise, was given in the response documents that any of the points are false or incorrect. I would assume we agree on the validity of those points then?

The PPL responses also attempt to personally discredit me and say I have no standing or right to bring a complaint, and the law of the tariffs gives the company legal ground to squash any and all complaints. That is false. I do expect to be treated with respect and willingness to engage in the specifics of the complaint and not denials about what is obvious while avoiding the specifics with flat denials. Am I misunderstanding the legal format and language of the response?

I am the end a customer who through an exchange of charges through the municipality, pays for the leasing of the lights and the energizing of those devices. I am also the subject of the abuse from the lighting. Streetlights are the largest source of light trespass in most municipalities, whether leased or outright owned. I am also subjected to the intense levels, excess illuminance, and intense strong glare sources that not only degrade visual acuity but takes away from the enjoyment of my property and the common natural resources that surround me. At the same time, personal safety is not substantially increased by the excess levels and in some cases has resulted in increased crime. Yet, I am burdened by these effects AND forced to pay by existing tariffs for the excess light and energy, along with the poor and minimal effort in lighting design when LEDs, because of their artifacts, require a higher level of design attention and device choice than previous technology. LEDs also have positive capabilities and I champion that. Mostly, these

capabilities are not taken advantage of. I am willing to pay for these advantages but not the disadvantages and excess costs.

In negotiating the tariffs with the PUC, did any utility bring up the negative effects and how the device choices and installation methods would not be nominal and would burden the customer with additional expense and undesirable effects? Was significant cost reduction achieved for the customer other than freed capacity and reduced maintenance costs for the utilities?

Speaking in common language,

From item 4 of the second response document, I did enter an informal complaint and received a phone call from a PUC Investigator. I can provide documentation of that. They advised me to open a formal complaint. I am perfectly fine with an informal complaint if it is a more suitable method.

While I am asking all the utilities in the Commonwealth of PA to use proper lighting methods and practices required by the new LED technology, I do have explicit data, emails, history, and memories relating to my interactions with PPL dating from the Autumn of 2021 to the current date. These experiences provided ample opportunities to learn about responsible lighting. I don't want to make these examples the substance of this complaint nor PPL Electric Utilities the only focus. I am not seeking a criminal or negligence complaint. Can we please have the responses stick to the substance of my 7 points!

If the utilities in Pennsylvania can't implement their streetlights in a responsible manner, then this becomes a lighting malpractice discussion that excludes these companies from implementing lighting without qualified designers involved. That is very much not my intent. I want them to do a fair business but implement street lighting in a responsible manner. Part of that is not charging their customers for the significant portion of light (energy) that is wasted and of no use to their customers. This waste is easily measurable and observable. The distribution plots are even part of the device specifications. It is not only the streetlight at my home but almost every streetlight in the Borough of Mechanicsburg and many other municipalities across Pennsylvania.

At no point did I see PPL personnel verifying, at night, any of the streetlights they installed. This was listed as a problem on PA DOT's own document that was created by a multi-state panel for SSL road lighting. Not verifying proper implementation and operation would be substandard work in my thinking but this again is not the focus of my complaint. It is an example of the lack of attention paid to the implementation and operation of streetlights.

In the case of PPL, I have a personal connection. I know very well the effort they put in perfect workmanship and safety along with the incredible effort they take during storms. I am simply asking all the utilities to provide the same amount of focus on their streetlight part of their business.

Light Pollution is a problem in every corner of the Commonwealth of Pennsylvania. It has inspired Pennsylvania legislative efforts for years, HB1803 and HB969 being the most recent examples. Both these PA House Bills were sponsored by Representative Pielli and requested and supported by the West Chester Dark Sky Committee, part of the West Chester Green Team in response to street lighting in West Chester and other municipalities. In 2019, with the help of my Pennsylvania Representative's staff, I wrote to the main Commonwealth of Pennsylvania Agencies with specific requests for their part in reducing light pollution and irresponsible lighting. Last year, I received a Pennsylvania House Citation for International Dark Week Week and a Governor's Proclamation. Concerns about light pollution were clearly stated in these documents along with some of the treasures Pennsylvania has that light pollution endangers. This year, I received Citations from both the Pennsylvania Senate and Pennsylvania House. I provided presentations to several organizations including Pennsylvania DCNR, EAC Network, Carlisle CAC, Mechanicsburg EAC, and PA DGS, Rockland Audubon/Sierra Club. This last meeting inspired members to work with the Cuomo Bridge Commission to reduce bridge lighting in bird migration season. In addition, I have viewed numerous municipal ordinances relating to lighting and provided guidance to other municipalities in Pennsylvania and analyzed situations, in some cases taking measurements and doing calculations related to lighting design, including complaints from residents in not only in Mechanicsburg but other municipalities. Streetlights are one of the components of light pollution. In pursuing that interest for the past 8 years, I have taken classes from Philips Lighting University, Signify Lighting University, and studied other institutional papers, articles, and books on the topic. As I recognized the many other effects, I have studied wildlife ecology, plant ecology, energy conservation as it relates to lighting. I am currently the Chair of DarkSkyPA, the Pennsylvania state chapter of DarkSky International.

Some history:

After a number of conversations with PPL representatives, I requested models and specifications of the planned lights. Stonewalling, they provided a quick list which required hours of research to pull up the specifications for each light in order to identify the features such as wattage, lumens, CCT, controls, and distribution types. Our EAC was given one evening to respond before the contract was signed for the street lights. I will not go into the background information or the quality of the contract but shortly after, we had a new borough manager.

I also presented comments at Mechanicsburg's Borough Council. One of the false marketing statements was the new streetlights were DarkSky Compliant. The specification sheet clearly stated the 4000K CCT streetlights were NOT DarkSky Compliant. Only 3000K or less were compliant at that time. In another area being developed, Legacy Park, someone made a false statement identifying street lights as 3000K at a Planning Commission meeting where phase plans were being approved. The plans were approved and the lights measured over 4000K CCT. The plan wouldn't have been approved had they known. At a Council meeting during this time I also clearly stated the 5 Principles for Responsible Outdoor Lighting put forth co-jointly by the IES (Illuminating Engineering Society) and DarkSky International, who is a recognized authority in lighting practices and night sky preservation.

When the streetlights were implemented in early 2022, I identified, through the specifications and confirming measurements, the new lights were 4000K CCT. When we saw the brightness and the amount of light trespass, I contacted the borough and PPL. PPL requested a survey of the newly installed 4000K LED streetlights. In the midst of winter (December and January), I did that survey and quantified the light trespass as all but a few of the new lights. I also identified a number of other problems relating to public safety. I shared this information freely with PPL. PPL commented they were ordering a large quantity of shields for the streetlights. The editor from the Carlisle Sentinel, Naomi Creason, came to Mechanicsburg and interviewed me while we surveyed the lights around the Filbert St/Chestnut St area. PPL stopped communicating and requested not to send them the survey information and to work through the borough. A form was put up on the borough website for people to enter complaints and ask for shielding. Included with the form were the normal industry marketing points, (I had seen the same points used other places, Carlisle, for instance). I challenged the borough manager about the incorrect information on the page and the information was taken down. Where the talking points came from, I can't say but no one at the borough had that level of lighting design experience. The lights on our area of the borough, being a different type (Contempo), were replaced with LEDs at a later time. We had a preview when a storm damaged the streetlight across our street from our home. PPL replaced the existing HPS light with a 4000K CCT LED. I measured the light level with a traceable meter and it exceeded the 5lux threshold at our house. The distribution type rendered the approach to our driveway unsafe where pedestrians on the sidewalk couldn't be seen due to disability glare. Perhaps this would be the incident in which the 2023 date was pulled from in the second response document?

**I bring these previous points up, not to bring a criminal complaint but to give background that I am able to give details about one specific utility's interactions and how street lighting was implemented. I have more than enough experience through those interactions to be a knowledgeable resource on this topic. I am also constantly in touch with lighting design scientists, professionals and specialists, ecologists and human health resources, and an**

**international community focused on quality lighting. I am totally devoted to moving forward on this topic of responsible lighting and not dwelling on what was done in the past.**

### **Answers to The Preliminary Objection Response:**

#### **I. Background**

1. This is true.
2. This is true, kind of...
3. True
4. Yes, 7 of them with additional comments
5. "Certain street lighting practices" is a derogatory reference to IES Standards RP-8 and RP-43? Seems a bit disrespectful to me. This technician's assessment is that these standards should be followed as best practice methodology for implementing outdoor lighting - streetlights.
6. Agreed. This is about ALL utilities in PA providing streetlights or energizing them. They all would profit from NOT following current standards and implementation methods and the ratepayers would pay for light having no or little value. It is incoherent that a utility would purposely waste energy AND then charge people for it. If better lighting technology AND methods to reduce energy waste are readily available yet ignored and billed, wouldn't that be a little fraudulent?
7. I have a wealth of measurements and observations. Maybe using 7 times the energy required and charging me for it would be an example? Maybe lighting up a rooftop and not lighting a crosswalk would be another? If any utility needs help with more examples to understand the meaning of IES standards, or the IES/DarkSky 5 Principles, or DLC's 7 Principles, or even CPTED principles, I will do my best to provide those. A side note: The PUC form itself constrains what I included. My night sky here is about 40 times the natural (about 18 mag/arcseconds squared). Should we be asking how much energy does it take to light the night sky to that level? A figure I received from a knowledgeable scientist would be about 240,000KWh's per year or enough to provide power to a dozen or so homes.
8. Are utilities required not to do negligent lighting? I believe this discussion is legally sufficient. An example: LEDs were implemented and supposedly better, yet pedestrian accidents increased. Part of the Vision Zero initiative is fixing the problem with how streetlights were/are implemented. Will the utilities ignore those recommendations, too? A continuation of current practices, really the old way, IS negligent lighting design. Therefore, this complaint is indeed quite legally sufficient. I'm trying my best to help the utilities not be negligent in how they provide lighting.

#### **II. Standards Review**

1. Commission sets tariffs, indeed.

2. 3. 4. 5. 6. 7.

I want to move forward and not discuss scandalous or impertinent behavior. I can certainly provide some examples of that if wanted. PPL specific, most all representatives and executives I spoke with were helpful and cordial. This is about deficient practices and methods, not people. For other companies, I can say it included scandalous and impertinent behavior exhibited to customers. Those are not part of this complaint and I doubt the utilities would like that past brought into this complaint.

Specify? IES Standards and IES/DarkSky Principles, DLC LUNA specifications aren't specific enough? Are utilities using the current level of RP-8? RP-43?

Is wasting energy yet billing me for it insufficient? 7 times the level and over 50% of the a light's emissions trespassing on my property insufficient? (My property only one of hundreds in one small town.)

I'm not suing anyone. Again is not PPL one of the utilities implementing and energizing streetlights in Pennsylvania?

I have no ongoing dispute or agreements for any alternative dispute resolution, although I am open to other avenues.

I'm a ratepayer and PPL is billing me more than they should for a service they provide. This is common across Pennsylvania and why this complaint is NOT specific but still inclusive of PPL.

10. My measurements are empirical, as are the Standards referred to, as are the 5 Principles. My 7 points are factual and based on observations. I challenge the argumentative and accusatory tone and inferences in the preliminary objection document. Can we please stop the bullying. Not a single lighting term or factual scientific citation was included in the response. Can everyone please stick to the 7 points?

III.

A. Please read my 1 through 7. PPL is wasting energy when alternative devices and methods are well defined and easily available. In addition, light from the example streetlight is trespassing on my property when I have requested it not. Then PPL is charging me for it. My 1 through 7 clearly states the problem in common terms. **I CAN DO ALL CAPS AND BOLD TOO BUT CHOOSE NOT TO.** (Yes, that was pretty offensive and accusatory - common language). As one of the utilities in Pennsylvania and because they are my provider, I am asking PPL use modern methods with modern lighting. We can't continue the old lighting practices with modern LED lighting. At the same time, the purpose of this complaint is to engage all the utilities who are implementing street lighting in a negligent way and ask them to change their ways to methods that have industry wide and abundant scientific support in lighting design, ecological and human health/well-being circles.

I could do a poll of members all across Pennsylvania to identify municipalities with problematic street lighting. That's like my survey of all the new streetlights in Mechanicsburg in the dead of winter. PPL thought that was a good strategy as they doubted someone would do it. I learned a lot about lighting from that endeavor. A current request, by the way, is to take EAC members and Council from a very eastern municipality in Pennsylvania on a walk-through of their municipal lighting to teach them about their streetlights and what can be done to make them better. I could enjoin others and the result will be the same.

**CONCLUSION:**

Restating and bolding for the purpose of exclamation: **PPL is not the lone focus of my complaint.** Yet, I do take offense at their strategy to avoid this discussion and their part in this problem. Since PPL is a utility implementing and charging for streetlights, they are indeed part of this complaint. My past experience with PPL has been very positive and they were responsive to specific requests. I have much respect for PPL as a company for many reasons. At the same time, my points are clear. *Wasting energy and billing customers for it through deficient company lighting practices is not acceptable.* Even the lighting industry has moved on and has products, lists of products, and implementation methods that resolves all of my 7 points. In addition, some of the old practices are causing a danger to the public. It is a public safety issue. The post-LED increase in pedestrian accidents is evidence. We shouldn't be arguing legal points in offensive ways but should be working together towards solutions. Can we please do that?

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**Second Response Document Answers**

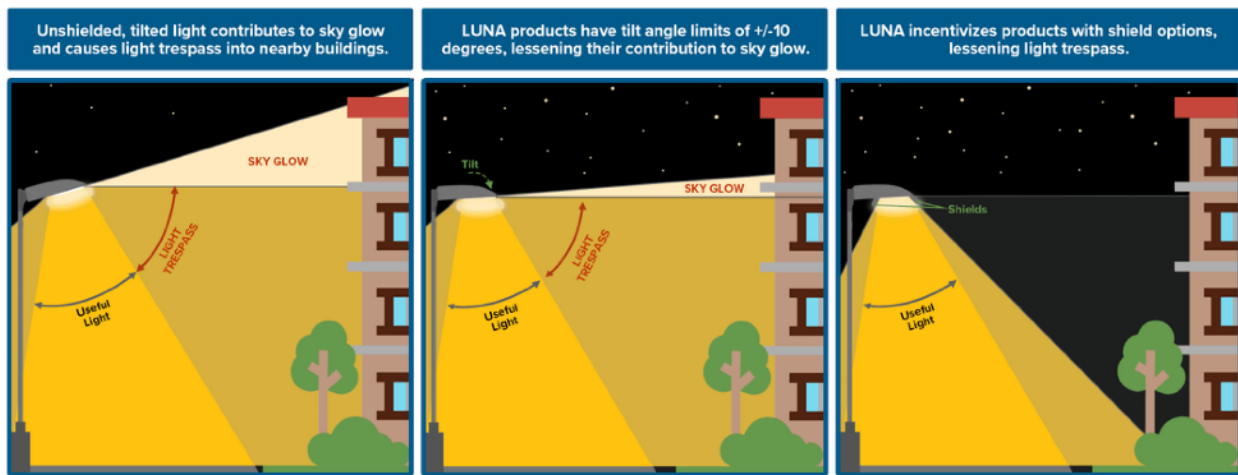
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Again, the lawyer-speak is onerous and difficult to translate. Have I not defined the problem and made the complaint simple enough? I refrained from using specific technical lighting terms and endless links of research papers, articles, and websites. In the past, I did provide such information to my PPL contacts from researchers and the lighting industry. Both municipal code and legislative templates are available and utilities implementing streetlights should be well versed in those specifications.

Following the numbers in the response is difficult because of the rendering of the original form on my MacOS system. Forgive me if some of the numbered responses do not match.

1. That would be my personal information and customer account number. Correct?
2. I wrote it from the bill. Whatever you want it to be here is fine.
3. Type of utility service? Agreed.

4. I have an email from Ricky Wijaya, Investigator Public Utility Commission dated 12/31/2025 requesting a callback, which I did. Since this request did not ‘fit’ the fields in the informal complaint form, this was a conversation and I would think it is documented at the PUC. In the conversation I was advised to open a formal complaint. I tried the informal path first. I am certainly fine with an informal complaint if it more efficiently accomplishes resolving the stated problem. In that conversation, I made it very clear it was not solely focused on PPL.
5. Section 4, Statements 1 through 7 are purposefully simplified and explicit.  
<https://designlights.org/our-work/luna/responsible-light-at-night-local-governments/>  
 Summary statement: Current municipal street lighting systems leased from utilities across



Pennsylvania result in significant wasted energy, light pollution, light trespass and unnecessary costs that are passed on to ratepayers through existing tariffs.

I’m trying my best to not make an example of PPL but that is where I have data. The image on the left is how most streetlights are implemented. I have collages of photos that I shared with PPL showing this waste from spill light and light trespass in Mechanicsburg. The light and energy needed to create it is wasted and of little or no use. For example, the streetlight in our area, a contemporary “Contempo” design model from the 1970’s, now remanufactured with LEDs, emits about half of its light in a horizontal direction, 20-some feet off the ground, forming light trespass. My property, PPLs light. Observable and measurable, and worthless.

Note: It appears no HSS or SSS (House and Street Side Shields) are available for Contempo style lights. This model is purposefully designed to emit light sideways. Shields are normally in no manner helpful in redirecting light and making it useful light, they just block it. Additionally, close proximity to the homes makes this specific model an inexcusable lighting design choice.

Archeon devices throughout the older parts of the borough, while good quality, are mounted old mounting arms made for a different lighting technology and in such a way to exhibit a high amount of light trespass. As requested by PPL, I surveyed the Archeon lights and documented

each light with significant light trespass. All the data was shared with PPL. I would be able to provide the spreadsheets and photos if requested. Again, my purpose is not to focus on PPL but to expose what is common practice. Spill light is all wasted light and wasted energy that has little or no use. Additional observations were of streetlights improperly installed with tilt, directing light at homes. This is deficient in design and since the design emits a significant amount of light trespass, which again is worthless and in many cases disruptive to the homeowner, it can't be included in the tariff. The tariff would assume the wasted light is delivering a service, which it is not. The customer can't be billed for that wasted energy. Since safety is mentioned, glare from the installed 4000K CCT lights is a significant source of visual acuity loss, especially older drivers and pedestrians. Philips lighting had a 2019 Lighting Webinar that spoke to the effects on aging drivers. It's not safe and why RP-8 CCT recommendations are moving lower, to 3000K max and 2700K. In addition, some of the light levels observed are many times the IES standards. Mine measures 46 lux. It should be about 7 lux. In addition, while many streetlights exhibited significant light trespass, critical infrastructure, such as pedestrian crosswalks were left unlighted. Don't tariffs assume good design and implementation? Do the tariffs expect a certain measurable quality or at least an honest assessment?

All my 7 Section 4 statements are measurable and observable, backed up by authoritative sources. There is no denying. Significant light and, therefore, energy is being wasted. I am being billed for something of no value and that practice should not be protected in the future by tariff definitions.

What's to deny in the following photos? Statements 1 through 7 are all exhibited. Please do not focus on PPL and this specific instance.



This next example is known as striping and it is not safe. It's a combination of too high a level of light and improper coverage. Each light takes our eye adaption from veiling glare to no light. It is dangerous. These are observable specific examples and there is no denying.



6. Is this my Section 5, we are talking about? Can someone please explain how any of my “averments” are not warranted? I’m not sure about the abuse comment.

I asked for utilities to follow the current standards and best practices from institutions like the IES and others authoritative lighting industry organizations for lighting and lighting devices. This would result in less energy usage, higher quality lighting at a lower cost to consumers, and a safer nighttime environment. What is problematic about that? I believe a proper response rather than a claim of denial is needed.

If utilities are not using the best practices in lighting efficacy, far more than just implementing LEDs, then they should not be rewarded by a tariff that imposes no reason to improve or change. If the light and the energy to produce it has no usable quality for a customer then that is cheating the customer. If a product is offered for a price but proves to be deficient or unusable, the customer can seek relief. It would be an abusive relationship otherwise.

A lot was known about the effects of light and responsible lighting when Mechanicsburg's lights were implemented. In 2000, light's effects and the human mechanics were defined. 26 years ago now. Thousands of research articles and authoritative ecological and medical resources are available to guide choices. I mentioned this to inform the PUC that much more is involved than a tariff. I do not think we want to traverse into that discussion, though I am certainly willing and able.

My final paragraph summed it up. Most lighting issues would be resolved by responsibly following IES, DarkSky, and DLC LUNA guidance and standards. To do otherwise, clearly results in wasted light with no value, wasted energy that costs consumers who are billed for something of poor quality or no value, and only encourages utilities to continue doing so. If streetlights produce light that is not useful, targeted, proper level, controlled, and contain the minimum amount of blue spectra known to have detrimental effects, then why am I paying for it?

7. The "complainant" discussed these matters way before 2023. That was a specific situation mentioned before, a sequence of events starting with storm damage to our streetlight, resulting in a 4000K Contempo light being installed. It was insanely bright and caused visual safety and extreme light trespass. PPL thankfully found an HPS version and then a 3000K LED version. It was still too bright and some work was done on the light to make it better. This light was installed by a contractor but a PPL line crew came to do what they could. We appreciated that but the light is still a problem and the mitigation work has mostly disintegrated. At the time, I saw in the specifications, this model had a manual light level adjustment and asked if that could be adjusted downward to a proper level. No updates were ever given but I suspect it has the potentiometer to do so. It's just not PPL's desire to do that adjustment and open the door to many more. Certainly, there's questions on reducing the light level and knowing how much to bill.

I have indeed spoken with PPL representatives numerous times when the LED Retrofit project began. Some of those contacts are retired by now. I was also communicating with an executive who helped not only with streetlight concerns but also other issues with a PPL contractor in the borough who was leaving plastic shards in the street. As I previously stated, through those discussions, PPL provided a list of the models of the streetlight devices they were planning to use

as retrofits for the Borough of Mechanicsburg. We exchanged numerous emails during that time. Afterwards, I continued to converse with PPL representatives when I ran across lighting information that would be beneficial for them to know. As the survey is mentioned, it was in direct communication with a PPL representative. After I started the survey, PPL asked for additional information to be included in the survey. I shared that survey and photographs of light trespass and other problems with the PPL representative. The number of photo's became to large to share within the spreadsheet so I had to find methods to make collages of smaller versions and share them separately from the spreadsheet. If those discussions and email threads are not available to PPL, I most likely find some of them. Either way, what happened in the past has little bearing here and clouds the issue.

8. Agreed. eFile is fine.

9. Agreed.

10. Agreed.

11. Agreed.

#### NEW MATTER

1. ?

2.

3.

4. Yes

5. Not so fast. The Borough of Mechanicsburg receives the bill and passes those costs on to the real customer who pays the bill. Me.

6. If the utility is in a way, defrauding the customer, by not providing services in a technically responsible way, causing additional costs to be billed to the customer, then wouldn't that be an abusive business practice that should not continue into the future? Any force of law that continues to abuse a situation is one that needs some adjustment.

7. The PUC did not have the information in this complaint when previously setting the tariffs. That doesn't mean the situation, now brought to light, should not cause the PUC to review the and renegotiate the tariff. The question is simple: Are utilities, in general, implementing streetlights in a way that wastes significant energy while providing no usable service? The answer is, yes. In my case, you can't use a larger wattage light than required causing reflected light upwards, use light devices emitting/delivering half or more of their light off target as light trespass and skyglow, keep them on all night long at full level, and expect to bill the 'customer' for that service. If that is in the past, lets move on.

8. The options are to continue as is, and then I do ask for an adjustment to the tariff, or work towards using qualified lighting products, proper implementation, and better methods that solve the wasteful practices of the past. This is in everyone's best interest, is it not?

9. I think I have done explicitly that but will be available to provide more information if needed.

10. With the significant waste that is observable and measurable, yet being passed on to the customers, I disagree.

*While I have used my experiences with PPL as the basis for this complaint, I can't say this enough or express my gratitude enough for PPL's actions when people really need them. This complaint is far wider than PPL and not to be derogatory to PPL in any way.*

My desire is for utilities in Pennsylvania to be responsible with the lighting they lease, sell, or even energize. If they are implementing street lighting, then it should be as an expert in lighting design related to streetlights, choosing products and methods to minimize the waste and thereby minimizing the associated negative effects and costs of irresponsible lighting.

DarkSky International's 5 Principals, The Municipal and Statute Templates, and the more rigorous DLC Seven Strategies to minimize Negative Impacts of Outdoor Light at Night, are all evidence implementing lighting can no longer be done in a careless, haphazard manner. Responsible lighting practices should extend to utilities and the lighting they implement. Responsible lighting practices would eliminate the wasted light and energy saving both the utilities and customer excess costs and detrimental effects. A recent work by DarkSky, The National Park Service, and an energy company in New Mexico showed that light pollution and skyglow could be reduced by 90%, energy cost by 60%, and worker visual safety significantly increased. Yes, effort is needed but both the customer and the utilities would all benefit.

In any case, utilities across Pennsylvania should not charge customers for the wasted energy associated with light trespass, excessive brightness levels, and times when the streetlights are not needed at full power. These are commonsense requests and should be part of any tariff considerations.

Additionally, utilities have a moral and ethical responsibility to provide safe streetlights and implementation methods to safeguard human well-being and support ecological health. PPL, as long as I remember, has always done this. Lighting and streetlights, specifically LEDs, require extra attention that has been lacking, the 4000K streetlights in residential areas for example. It never should have happened but I doubt the PUC knew, although the 2016/2019 AMA statements should have been diligently discussed as part of tariff requirements.

Respectfully and Sincerely,

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