



**BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF CALIFORNIA**

**FILED**

08/01/24

01:11 PM

**C2408001**

Mary Ann Schell and Gavin Wilson,

Complainants,

vs.

Pacific Gas and Electric Company (U39E),

Defendant.

(ECP)

Case (C.) \_\_\_\_\_

Expedited Complaint  
(Rule 4.6)

COMPLAINANTS	DEFENDANT
Mary Ann Schell and Gavin Wilson 6736 Messinger Flat Road Valley Springs, CA 95252 T1: 813-570-2724 T2: 209-715-7248 E-mail: <a href="mailto:maryannschell1@gmail.com">maryannschell1@gmail.com</a>	Pacific Gas and Electric Company (U39E) Attn: Steven Frank, Attorney 300 Lakeside Drive Oakland CA 94612 T: 415-973-6976 E-mail 1: <a href="mailto:steven.frank@pge.com">steven.frank@pge.com</a> E-mail 2: <a href="mailto:pgetariffs@pge.com">pgetariffs@pge.com</a>

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

(A) Mary Ann Schell and Gavin Wilson

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COMPLAINANT(S)

vs.

(B) PG&E

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DEFENDANT(S)

(Include Utility "U-Number", if known)

(for Commission use only)

(C)

Have you tried to resolve this matter informally with the Commission's Consumer Affairs staff?

☒ YES ☐ NO

Has staff responded to your complaint?

☒ YES ☐ NO

Did you appeal to the Consumer Affairs Manager?

☐ YES ☒ NO

Do you have money on deposit with the Commission?

☐ YES ☒ NO

Amount \$ \_\_\_\_\_

Is your service now disconnected?

☒ YES ☐ NO

COMPLAINT

(D)

The complaint of (Provide name, address and phone number for each complainant)

Name of Complainant(s)	Address	Daytime Phone Number
Mary Ann Schell	6736 Messinger Flat Rd, Valley Springs, CA 95252	813 570 2724
Gavin Wilson	6736 Messinger Flat Rd, Valley Springs, CA 95252	209 715 7248

respectfully shows that:

(E)

Defendant(s) (Provide name, address and phone number for each defendant)

Name of Defendant(s)	Address	Daytime Phone Number
PG&E	3136 Boeing Way, Stockton, CA 95204	209 955 7300

(F)

Explain fully and clearly the details of your complaint. (Attach additional pages if necessary and any supporting documentation) *★ 16 pages of attached evidence pages ★*

Property owners applied for electric service reconnection in March 2024.

The property's 200-AMP underground electric service was cut due to fire. Now the property owners have brought the property back to Safe Condition and the next step is for PG&E to restore/reconnect the property's 200-AMP underground electric service.

PG&E agreed to do so via a telephone call to property owner Mary Ann Schell. Transcript attached with evidence. Following this, without reasoning, PG&E is saying the property requires New Service.

CPUC CAB reviewed this case and suggests the next step is the Administrative Law Judge hearing.

*16 pages*  
Attached are ~~8 documents~~ provided as evidence for this Formal Complaint Hearing Request.

## (G) Scoping Memo Information (Rule 4.2(a))

(1) The proposed category for the Complaint is (check one):

☒ adjudicatory (most complaints are adjudicatory unless they challenge the reasonableness of rates)

☐ ratesetting (check this box if your complaint challenges the reasonableness of a rates)

(2) Are hearings needed, (are there facts in dispute)? ☒ YES ☐ NO

(3) ☐ Regular Complaint ☒ Expedited Complaint

(4) The issues to be considered are (Example: The utility should refund the overbilled amount of \$78.00):

The property's underground 200-AMP Permanent electric service to be restored/reconnected by PG&E now that the property has been brought to Safe condition. PG&E stated the timeframe for this work would be before the end of October 2024. Property owners would like to maintain this restoration/reconnection timeframe.

- (5) The proposed schedule for resolving the complaint within 12 months (if categorized as adjudicatory) or 18 months (if categorized as ratesetting) is as follows:

Prehearing Conference: Approximately 30 to 40 days from the date of filing of the Complaint.

Hearing: Approximately 50 to 70 days from the date of filing of the Complaint.

Prehearing Conference (Example: 6/1/09):	
Hearing (Example: 7/1/09)	

Explain here if you propose a schedule different from the above guidelines.

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(H)

Wherefore, complainant(s) request(s) an order: State clearly the exact relief desired. (Attach additional pages if necessary)

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(I)

**OPTIONAL:** I/we would like to receive the answer and other filings of the defendant(s) and information and notices from the Commission by electronic mail (e-mail). My/our e-mail address(es) is/are:

maryannschell1@gmail.com
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(J)

Dated Valley Springs, California, this 25 day of July, 2024  
(City) (date) (month) (year)


  
 Signature of each complainant  



\*(MUST ALSO SIGN VERIFICATION AND PRIVACY NOTICE)



**(K)****REPRESENTATIVE'S INFORMATION:**

Provide name, address, telephone number, e-mail address (if consents to notifications by e-mail), and signature of representative, if any.

Name of Representative:	
Address:	
Telephone Number:	
E-mail:	
Signature	

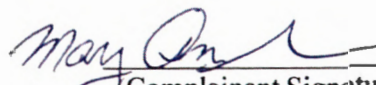
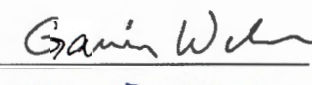

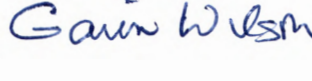
**VERIFICATION**  
(For Individual or Partnerships)

I am (one of) the complainant(s) in the above-entitled matter; the statements in the foregoing document are true of my knowledge, except as to matters which are therein stated on information and belief, and as to those matters, I believe them to be true.

I declare under penalty of perjury that the foregoing is true and correct.

**(L)**

Executed on July 25, 2024, at Valley Springs, California  
(date) (City)

  
(Complainant Signature)   
 

**VERIFICATION**  
(For a Corporation)

I am an officer of the complaining corporation herein, and am authorized to make this verification on its behalf. The statements in the foregoing document are true of my own knowledge, except as to the matters which are therein stated on information and belief, and as to those matters, I believe them to be true.

I declare under penalty of perjury that the foregoing is true and correct.

**(M)**

Executed on \_\_\_\_\_, at \_\_\_\_\_, California  
(date) (City)

\_\_\_\_\_  
Signature of Officer

\_\_\_\_\_  
Title

**(N) NUMBER OF COPIES NEEDED FOR FILING:**

If you are filing your formal complaint on paper, then submit one (1) original, six (6) copies, plus one (1) copy for each named defendant. For example, if your formal complaint has one defendant, then you must submit a total of eight (8) copies (Rule 4.2(b)).

If you are filing your formal complaint electronically (visit <http://www.cpuc.ca.gov/PUC/efiling> for additional details), then you are not required to mail paper copies.

**(O)** Mail paper copies to: California Public Utilities Commission  
Attn: Docket Office

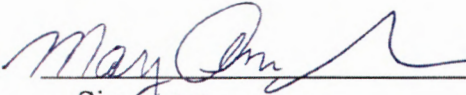

505 Van Ness Avenue, Room 2001  
San Francisco, CA 94102

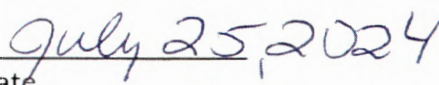
### PRIVACYNOTICE

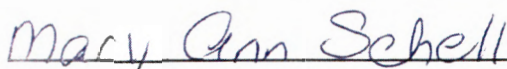
This message is to inform you that the Docket Office of the California Public Utilities Commission ("CPUC") intends to file the above-referenced Formal Complaint electronically instead of in paper form as it was submitted.

Please Note: Whether or not your Formal Complaint is filed in paper form or electronically, Formal Complaints filed with the CPUC become a public record and may be posted on the CPUC's website. Therefore, any information you provide in the Formal Complaint, including, but not limited to, your name, address, city, state, zip code, telephone number, E-mail address and the facts of your case may be available on-line for later public viewing.

Having been so advised, the Undersigned hereby consents to the filing of the referenced complaint.

  
Signature Grain Wilson  
  
Grain Wilson

  
Date

  
Print your name

Mary Ann Schell  
Gavin Wilson  
6736 Messinger Flat Road, Valley Springs, CA 95252  
(813) 570-2724 maryannschell1@gmail.com

June 28, 2024

Wanton Burks, CAB Representative  
Consumer Affairs Branch, California Public Utilities Commission  
320 W. 4th Street, Suite 520  
Los Angeles, CA 90013

CPUC File No: 636842

**REQUEST TO CONSIDER NEW EVIDENCE** into

PG&E declines to restore/repair the property's underground 200-amp electric service after agreeing to do so on 04/27/2024 and is now trying to charge for a New service.

Property Address: 6736 Messinger Flat Rd, Valley Springs, CA 95252

Brief description of new evidence submitted in this package:

1) Electric Rule #2 Description of Service: *"It is the responsibility of the applicant to ascertain and comply with the requirements of their governmental authorities having jurisdiction".*

Evidence: Property owners ascertained and complied with the requirements of their governmental authority having jurisdiction by obtaining the 03/04/2024 Calaveras County Building Permit #B24-0275 for the restoration 200-amp underground electrical panel with structure. This structure with a 200-amp underground electrical panel is complete and the property is now deemed in safe condition for PG&E to repair/restore their electric infrastructure and consolidate the property's electric service which was cut at the property due to fire.

2) PG&E is referring to Electric Rule #13 in their evidence statement: *"Temporary Service A. ESTABLISHMENT OF TEMPORARY SERVICE. PG&E shall, if no undue hardship to its existing customers will result there from, furnish temporary service ...".....*

Evidence: Per Rule #2, property owners have complied with their local jurisdiction, Calaveras County, with permitting the 200-amp underground electric panel with structure, and have returned the property to Safe Condition. The property qualifies for restoration/repair of electric service which was cut due to fire and does not fall under Rule #13 Temporary Service.



3) PG&E is referring to Electric Rule #16 in their evidence statement: "Service Extension"  
Service Extension meaning: the provision of service through any physical or operational infrastructure arrangement other than consolidation. Consolidation meaning: To join together into one whole.

Evidence: The property requires consolidation per 1) the Calaveras County Building Permit attached, 2) the CPUC Cisco Gonzales 04/22/2024 conversation transcript attached, and 3) the PG&E Dan Huffman 04/27/2024 conversation transcript attached.

The customer does not necessitate a customer-driven scope of work modification.

Evidence: Telephone meeting transcript notes attached. PG&E Dan Huffman's 04/27/2024 telephone call to property owner Mary Ann Schell when he described the property's characteristics aligning with Rule #2 with PG&E as responsible for repairing/restoring their infrastructure and the property owner is responsible for paying for the property's infrastructure - notes taken during this call, dated and signed are attached.

Evidence: Telephone transcript notes attached. CPUC Cisco Gonzales's 04/22/2024 telephone call to property owner Mary Ann Schell - Mr. Gonzales advised that the property owner is responsible for complying with the requirements of their governmental authorities having jurisdiction to obtain electric service restoration, Rule #2 - notes taken during this call, dated and signed are attached.

Evidence, Rules & Tariffs Review:

Property owners acknowledge that nowhere within the Rules and Tariffs is the requirement that a new property owner be disallowed from the repair/restoration of an existing electric service that was cut due to fire once the property has been brought to a safe condition.

Evidence, 05/15/2024 PG&E Contract to Property Owners:

PG&E Proposed Contract for New Electric Service to Property Owners at Property Owners expense for PG&E's infrastructure. PG&E placed a modification within their contract that added an unnecessary Splitter Box to the single property service falsely changing the project from restore/repair to new service *which removes PG&E from their financial responsibility for repairing their infrastructure*. Splitter Box is described as: Splits feeder circuit conductors into multiple branch circuit conductors and comes with pre-installed terminal blocks for three-and four-wire power distribution systems.

Evidence, 03/25/2024 PG&E Letter to Property Owners:

PG&E's notice to property owners at 6736 Messinger Flat Rd, Valley Springs, CA of possible disruption in electric service to the property on April 9, 2024, due to work on the power pole work that services their property. This letter documents PG&E's records of the property's current electric infrastructure to the property. Within their System, PG&E has documented a current Smart Meter providing service to the property.



Evidence. Online Survey taken by Gavin Wilson, property owner documenting his statement of inconsistent opinions provided by PG&E Representative Nick King. A copy of this online survey was not copied to Gavin Wilson, however, it would be available to the CPUC,

Documents and Photographs as evidence attached:

- a) Local jurisdiction Calaveras County Building Permit for the property's restoration/repair of 200-amp underground service.
- b) Property's new structure with electrical panel for the 200-amp underground service
- c) Location of new structure to PG&E Pole with Transformer containing the conduit
- d) Location of cut service location with property's smart meter; 40 feet further from the power pole than the new electric panel.
- e) 03/04/2024 Calaveras County Building Permit #B24-0275 for the repair/restoration of the 200-amp underground electrical panel with structure.
- f) Phone Log with dated/signed notes Mary Ann Schell took during a call with PG&E Dan Huffman on 04/27/2024 referenced in the original investigation request,
- g) 04/27/2024 transcript notes dated/signed that property owner Mary Ann Schell took during the telephone call from Dan Huffman referenced in the initial investigation request.
- h) 04/22/2024 transcript notes dated/signed that Mary Ann Schell took during call from CPUC Cisco Gonzales referenced in the initial investigation request.
- i) 03/25/2024 PG&E Notice to existing customer of potential disruption in electric service.





# Calaveras County Building Department

891 Mountain Ranch Rd.

San Andreas, CA 95249

Phone: 209-754-6390, Fax: 209-754-6396

Website: building.calaverasgov.us

**Permit #: B24-0275**

Permit Type: OVER THE COUNTER

Permit Subtype: ELECTRICAL REPAIR

**Issue Date: 3/4/2024**

Applied Date: 3/4/2024

Approved Date: 3/4/2024

Expiration Date: 3/4/2025

## Building Permit

Job Address: 6736 MESSINGER FLAT RD, PALOMA

Job Discription: 200AMP METER

Owner Builder: Checked

Total fees: \$ 246.00

Total Construction Cost: \$ 2,500.00

### Parcel Information:

APN: 016003050

Setbacks:

Zoning: RR-X-MH

Front: 0

Corner: 0

School Dist.: CALAVERAS

Sides: 0

Back: 0

Fire Dist: MOKELUMNE HILL

### Contractor Information:

OWNER BUILDER

### Permit Information:

# of Stories: 0

# of Bedrooms:

# of Bathrooms:

### Owner Information:

SHELL M TRUSTEE

PO BOX 455

WALLACE, CA 95254

209-715-7248

### Building Type and Occupancy

<u>Occupancy</u>	<u>Construction</u>	<u>Occupancy</u>	<u>Square</u>	<u>Occupancy Description</u>
<u>Type</u>	<u>Type</u>	<u>Load</u>	<u>Footage</u>	
			0	
			0	
			0	
			0	
			0	
			0	

THIS PERMIT EXPIRES IF WORK IS NOT COMMENCED WITHIN 12 MONTHS OR IF WORK IS SUSPENDED FOR 12 MONTHS.

Authorized Signature \_\_\_\_\_

Date: \_\_\_\_\_

Printed on 3/4/2024 9:34 AM BY Susy Brazil

\* Electrical Load Calc Sheet













6:51



## Call details



Dan Huffman PGE  
Mobile • +1 916-202-2921



Incoming call 3m 26s  
Saturday, April 27, 2024 at  
12:11 PM



Outgoing call 1m 48s  
Saturday, April 27, 2024 at  
12:11 PM



Incoming call 9m 38s  
Saturday, April 27, 2024 at  
12:00 PM



Copy number



Edit number before call



Delete


\* Notes taken during call  
from Don Huffman, PG+E  
04/27/24 12:30 PM \*

- Power at property out due to fire 02/22/22
- Can't reuse wire as it may be damaged, PG+E replaces this conduit/wire
- PG+E would submit a claim to property owner's insurance to recoup cost
- Since there is no insurance to submit a claim PG+E will cover the cost to restore 200-amp underground service
- We, property owners, are to cover the cost associated with bringing the property up to safe condition
- PG+E will connect to Transformer down power pole underground to property's new electric panel at their cost.





- PGE has from 110 days from application date until end of October 24 to complete work to restore service.
- PGE will try to have 200-amp electric service connected before October.
- Don is now project manager not Nick King. Call Don with any questions now.

4/27/24 May 

04/22/24

Public Utilities Commission

Question = What are the Rules and/or Tariffs for repair/restoration of electric after a fire.

800 649 7570

Spoke with intake rep. Kia 11:00am

12:24 pm Cisco Gonzales, PUC  
called me re: my request.

Cisco notes:

- NO Rules and tariffs to reference
- Follow County Building Codes
- Create property with Electrical Panel
- Electrician will know proper safe way to build once permit is acquired from County.
- Then Contact PG+E for connection/repair/restoration of electric

Mg [Signature]



Pacific Gas and  
Electric Company

Letter ID: 915162

March 25, 2024

**An Important Notice of a  
Planned Electric Service  
Interruption in Your Area**

PG&E Customer at  
6736 MESSINGER FLAT RD  
VALLEY SPRINGS, CA, 95252-9256

000053

Dear Valued Customer,

PG&E will be temporarily interrupting your electric service in order to safely perform the following work in your area:

**Replace Electric Power Pole**

The planned electric service interruption affects the following vicinity or property address:

**6736 MESSINGER FLAT RD  
VALLEY SPRINGS, CA, 95252-9256  
Meter#: 1008898854**

Although we will do our best to minimize the length of the service interruption, please be prepared to be without electric service on the following date(s) and **estimated timeframe(s)**:

**Tuesday, April 9, 2024 from 9:00 AM to 3:00 PM**

We will make every effort to complete the work as scheduled, however, unsafe weather conditions or an unforeseen emergency may force us to cancel the work on the scheduled day. In such a case, we may be unable to notify you in advance of the cancellation.

We greatly appreciate your cooperation and thank you for your patience. For outage questions, please contact the number below. For general questions about PG&E service, call our customer service center at 1-800-743-5000.

LINDA- STOCKTON AREA  
Planned Outage Coordinator  
**(209) 942-1615**

**Para ayuda en español por favor llame al 1-800-660-6789**



June 7, 2024

CPUC provided File No:636842

**Public Utilities Commission, Investigation Request into PG&E's refusal to restore property's underground 200-amp electric service without cause**

Project summary:

1. Property Address: 6736 Messinger Flat Road, Valley Springs, CA 95252
2. Property Description: 7.5 acres, zoned RR-5, Public water connected on the property, Septic on the property, Power pole with transformer at the property line, all properties on this street have underground 200-amp power.
3. Property Owners: The MTG Trust of 2013, Mary Ann Schell, Gavin Wilson
4. PG&E Application with a \$3,000 deposit submitted at the beginning of March 2024 by property owner, Gavin Wilson.
5. Calaveras County Permit for the property's structure with electric panel for underground 200-amp electric service provided with project application to PG&E.
6. A licensed electrician completed the permitted structure build for the property's underground 200-amp electric service, and the previous PG&E Smart Meter remains with the property.
7. PG&E assigned local Project Managers, Dan Huffman, and Nick King to the project.

Project issues:

- *The property is entitled by the State of California for its reconnection of the "property's underground 200-amp electric service" once deemed safe to do so.*
- The property is now deemed safe for the property's underground 200-amp electric service as required by the State of California.
- PG&E knowingly and willfully presented an erroneous out-of-scope contract to the property owner, Gavin Wilson for e-signature.
- PG&E's Dan Huffman has placed this project on hold.
- The property owner's \$3,000 deposit has been falsely applied to the inaccurate project created by PG&E's Dan Huffman and Nick King.
- PG&E's Dan Huffman and Nick King have acted unconscionably in their attempt to coerce property owners into accepting the "property's new 50-amp electric service".
- Historical email communications will be provided upon request.
- Handwritten notes, dated and signed, which were taken on telephone calls will be provided upon request.
- Actions by Dan Huffman and Nick King to date have been deliberately inconsistent, inaccurate, and uncooperative hindering the progress of the project

Significant Evidential Meeting Summaries:

May 28, 2024 9:00 AM - Calaveras County Department of Public Works

Calaveras County Department of Public Works, Joshua Ksenzulak, spoke with property owner, Mary Ann Schell and confirmed that property owners have the necessary permit for the "property's restoration of its underground 200-amp electric service". Joshua Ksenzulak then told

Mary Ann Schell that PG&E could utilize their annual maintenance permit to complete this work or pull a utility encroachment permit to complete the work

April 27, 2024 12:30 PM, PG&E's Dan Huffman called Mary Ann Schell, the co-owner of the property, to discuss the property's underground 200-amp electric service.

Dan Huffman stated in this telephone conversation:

- 1) Power was cut at this property in February 2022 due to fire.
- 2) PG&E cannot use the existing power wire for safety reasons.
- 3) PG&E is responsible for providing new wire, this is Standard Procedure after damage by fire.
- 4) If the property was deemed safe to restore power by the prior property owners, PG&E would submit a claim to their homeowners' insurance.
- 5) Since the request for power restoration is being requested by new owners who have now updated the property to be safe for power restoration, PG&E will cover the cost of the restoration.
- 6) The Pole at the property has been inspected and is confirmed good as of April 9, 2024.
- 7) The property's underground 200-amp electric service will now be restored by PG&E.
- 8) There is no splitter box, the new line will run from the transformer, down the power pole, underground to our built structure electric panel that has now been permitted and installed.
- 9) Our obligation as the property owners is to pay for our electrician's work.
- 10) PG&E will restore the property's underground 200-amp electric service between the required minimum of 110 days from the application date and no later than October 2024. However, PG&E will work to have service restored sooner rather than later.
- 11) Dan is now the Project Lead and Nick is no longer the Project Lead. If we have any questions Dan is now the contact person.

April 22, 2024 Public Utilities Commission

Mary Ann Schell called the Public Utilities Commission @ 11:00 am and spoke with intake representative Kia.

12:35 PUC representative Cisco Gonzales telephoned Mary Ann Schell.

Mary Ann Schell's inquiry during this conversation with the PUC, Cisco Gonzales: Please point me toward the Rules & Tariffs surrounding the reconnection/repair/restoration of a property's electric service following a fire so I can best work with PG&E on this project.

Cisco Gonzales's response to Mary Ann Schell's inquiry in this call:

- 1) There aren't any Rules and Tariffs to reference.
- 2) Property owners are to follow the County's Building Codes.
- 3) Permit with the County.
- 4) Work with a licensed electrician to restore the property's electric infrastructure to safe condition to allow PG&E to accomplish its infrastructure work.
- 5) Contact PG&E for scheduling of its work.

Thank you Public Utilities Commission for your time with this investigation. We, the property owners, would ask the CPUC to investigate this situation and work with PG&E to complete our request to have the property's underground 200-amp electric service infrastructure from PG&E's power pole to the property's electric panel connected. We the property owners have completed our responsibility (construction and financial) to bring the property to a safe condition, now it is time for PG&E to complete its responsibility (construction and financial) of infrastructure and connect the property's underground 200-amp electric service.

**LIST OF SUPPORTING EVIDENCE NOW PROVIDED SURROUNDING PG&Es ATTEMPT TO CREATE A NEW SERVICE REQUEST WHEN PROPERTY QUALIFIES FOR RESTORED/REPAIRED 200AMP ELECTRIC SERVICE:**

- 1) 04/27/24 Call log, Dan Huffman, PGE to Mary Ann Schell
- 2) 04/27/24 Documented notes taken by Mary Ann Schell during the call from Dan Huffman when he confirmed PGE will cover the cost to restore/repair their infrastructure since property owners have now brought the property's electric panel back to Safe Condition.
- 3) 04/24/24 Documented notes from the call with Cisco Gonzalez, CPUC to Mary Ann Schell where Mr. Gonzales explained the appropriate steps in completing the Electric restoration/repair.
- 4) Permit documents from Calaveras County Building Department for the restored/repai red 200-amp property electric service including electrician receipt for bringing the property back to Safe Condition for PGE to complete their restoration/repair work
- 5) Picture of PGE Smart Meter located at the property's new electrical panel.
- 6) A letter from PGE to property owners regarding possible electrical outage at the specific property expected on April 9, 2024 due to Electric Pole work, which documents that PG&E has this property as having electric service.
- 7) An online Survey, is additional Evidence and was responded to by Gavin Wilson which is a statement documenting Nick King's inconsistent and manipulative behavior hindering the project to restore the 200 amp electric service to the property. CPUC should access this Survey as evidence. This survey was taken online by Gavin Wilson and he was not provided a copy of this completed survey.
- 8) PG&Es recently submitted Contract for new 209 amp electric service to property submitted to property owner, Gavin Wilson, modifying the existing service by adding equipment of an unnecessary splitter box. A Splitter Box is described as: Splits feeder circuit conductors into multiple branch circuit conductors and comes with pre-installed terminal blocks for three-and four-wire power distribution systems. This proposed modification falsely changes the project from a Restore/Repair to a New Service removing PG&E from financial responsibility.
- 9) Various email strings between PG&E, Nick King & Dan Huffman and property owners, Mary Ann Schell & Gavin Wilson documenting the harassment of property owners by PG&E resulting in the investigation request by CPUC and AG.
  - a) Nick King had Mary Ann Schell go to the County to obtain and provide PG&E with an easement from the 1970s

15

- b) Nick King required Mary Ann Schell to obtain and provide a letter of authorization from the neighbor to access the property
- c) Both of these documents are provided with this Evidence to CPUC.
- d) Once Mary Ann Schell provided these documents per Nick King's request on a telephone call, Nick King said these documents were not necessary and unusable. At this time Mary Ann Schell recognized the deliberately inconsistent and uncooperative behavior of Nick King, at which time Mary Ann Schell decided to work to have email communications and no telephone calls as a way to document the behavior which is hindering the project's success.