

May 31, 2016

Via Electronic Filing

Rosemary Chiavetta, Esquire
Secretary
PA Public Utility Commission
Commonwealth Keystone Building, 2 North
P.O. Box 3265
Harrisburg, PA 17105-3265

**Re: Docket No. C-2015-2511725
Pamela and Stephen Goforth v. Pennsylvania Electric Company
Objections of Penelec to Complainants' Late-Filed Exhibits**

Dear Secretary Chiavetta:

Attached for filing is the Objections of Pennsylvania Electric Company (Penelec) to the Late-Filed Exhibits filed by Pamela Goforth (Complainant) in the above captioned proceedings.

A copy of the Objections to Late-Filed Exhibits was provided to the Complainant in the manner indicated on the attached Certificate of Service.

If there are any questions, please do not hesitate to contact me.

Very truly yours,

Reger Rizzo & Darnall LLP

Margaret A. Morris

MAM/jmm
Attachment

cc: The Honorable Jeffrey A. Watson, PA Public Utility Commission [w/enc.]
Lauren Lepkoski, Esquire, FirstEnergy Service Company [w/att.]
Pamela and Stephen Goforth [w/enc.]

**Re: Docket No. C-2015-2511725
Pamela and Stephen Goforth v. Pennsylvania Electric Company
Objections of Penelec to Complainants' Late-Filed Exhibits**

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document has been served upon the following persons listed below, in the manner indicated, in accordance with the requirements of § 1.54 (relating to service by a participant).

Via Electronic and First Class Mail

Pamela Goforth
Stephen Goforth
55 Oak Grove Street
Oil City, PA 16301
Newlife21@verizon.net

Dated: May 31, 2016


Margaret A. Morris, Esquire

Answer; no certificate of service was attached. On January 9, 2016, the same 148-page document was emailed as a Reply to New Matter.

A Hearing Notice, dated December 3, 2015, advised the parties of the Call-in Telephonic Hearing scheduled for January 26, 2016 at 10 am. The Respondent submitted its Proposed Exhibits by letter dated January 15, 2016 to Judge Watson and the Complainants. On January 19, 2016, the Complainants forwarded an email to counsel for Penelec labeled Hearing Exhibits and attached the following documents: 1) Penelec's e-filed Answer and New Matter; 2) cover letter for e-filed Answer and New Matter to Complainants; 3) the 148-page Reply to Answer; and 4) the 148-page Reply to New Matter. On January 20, 2016, the Complainants filed with the Commission's Secretary a document labeled "Exhibit hearing Judges" consisting of 15 typewritten pages and one (1) hand written page.

The telephonic hearing was held as scheduled on January 26, 2016. Mrs. Goforth testified that she provided three copies of her proposed exhibits to Judge Watson, Penelec's attorney and the Commission's Secretary. Neither Judge Watson nor counsel for Penelec received the January 20th filing. By Secretarial Letter, dated January 27, 2016, the Commission's Secretary returned the two copies of the filing to Ms. Goforth; Penelec was not served. Penelec has obtained a copy of both the January 20 filing and the Secretarial Letter from the Commission's website.

By Interim Order dated May 2, 2016, Judge Watson provided Complainants the opportunity to late-file exhibits consisting of: the proposed exhibits which Mrs. Goforth indicated

that she sent to Penelec's attorney by email on or about January 19, 2016 and to the Commission's Secretary by mail on or about January 20, 2016; and a copy of the letter identified by Mrs. Goforth which she alleged to have received from Penelec which was on Respondent's letterhead and included the telephone number for Respondent. All late-filed exhibits were due by May 20, 2016 and objections due by May 31, 2016.¹ A copy of the email, dated January 20, 2016, resending the documents previously emailed on January 19, 2016 is provided as Attachment 1.

Penelec's response to the four proposed exhibits is addressed separately.

Penelec Answer and New Matter

Penelec does not object to the admission of its efiled Answer and New Matter and avers that the testimony of its witness proffered at the hearing supports the facts and law reflected in the Answer and New Matter.

Cover Letter to Answer and New Matter

Penelec objects to the admission of the Cover Letter to its efiled Answer and New Matter that explained the filing. The proposed exhibit is not relevant or material to the Complaint proceeding and does not constitute evidence in support of any testimony. Consistent with 52 Pa. Code § 5.401 and § 5.403, the Cover Letter should not be admitted into the record. A copy of the Cover Letter is provided as Attachment 2.

¹ May 30, 2016 is a legal holiday, therefore, objections are due May 31, 2016.

The 148-page Reply to Answer

Penelec objects to the admission of the 148-page Reply to Answer that contains statements regarding the Complainants' political and religious views. Said proposed exhibit raises issues that are not within the subject matter jurisdiction of the Commission to entertain. It is well-settled that the Commission has only the powers, and can only consider such matters, as are expressly, or by necessary implication given to it by the legislature. *Behrend v. Bell Telephone Co.*, 363 A.2d 1152 (Pa, Super 1976); *Brockway Glass Company, Inc. v. Penelec Power Co.*, 54 Pa P.U.C. 509 (1980); *Bones v. Bates Taxi, Inc.*, 51 Pa, P.U.C. 346 (1977). The proposed exhibit is irrelevant and immaterial and does not constitute admissible evidence. Consistent with 52 Pa. Code § 5.401 and § 5.403, the 148-page Reply to Answer should not be admitted into the record. A copy of the 1st page of the 148-page Reply to Answer is provided as Attachment 3.

The 148-page Reply to New Matter

Penelec objects to the admission of what appears to be the 148-page Reply to New Matter that duplicates the previously filed 148-page Reply to Answer. The Respondent avers that the first paragraph of this document was revised to reflect that it was mailed to the Commission's Secretary and Judge Watson on May 16, 2016. The proposed exhibit, in addition to being repetitious, is irrelevant and immaterial and does not constitute admissible evidence. Consistent with 52 Pa. Code § 5.401 and § 5.403, the 148-page Reply to New Matter should not be admitted into the record. A copy of the 1st page of the 148-page Reply to New Matter is provided as Attachment 4.

WHEREFORE, Respondent, Pennsylvania Electric Company, requests that its Objections to three of the four proposed exhibits submitted by Pamela and Stephen Goforth be granted and that only the Respondent's efiled Answer and New Matter be admitted into the record.

Respectfully submitted,

Dated: May 31, 2016



Margaret A. Morris, Esq.
Attorney ID No. 75048
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2929 Arch Street
Philadelphia, PA 19104
(215) 495-6524 tel.
(215) 495-6600 fax
mmorris@regerlaw.com

Counsel for Pennsylvania Electric Company

Attachment 1

**May 20, 2016 email from Complainants
Forwarding their Proposed Exhibits**

Margaret A. Morris, Esquire

From: newlife21@verizon.net
Sent: Friday, May 20, 2016 3:35 PM
To: Margaret A. Morris, Esquire
Subject: Goforth v. Pennsylvania Electric Company forwarded Marget Morris copy's requested by Judge Watson Penelc attorney. On May 20th 2016
Attachments: ANM - Goforth efiled.pdf; Cover Ltr - Goforth.pdf; I don to puc complant unreasinible charges on mt bill copy for margert a morris for penelec.doc; I don to puc complant unreasinible charges on mt bill copy for margert a morris for penelec-2.doc

Attachment 2

**Cover Letter to Complainant
re: Answer and New Matter**

November 24, 2015

Via Electronic and First Class Mail

Pamela Goforth
Stephen Goforth
55 Oak Grove Street
Oil City, PA 16301
Newlife21@verizon.net

**Re: Docket No. C-2015-2511725
Pamela and Stephen Goforth v. Pennsylvania Electric Company
Answer and New Matter of Penelec**

Dear Mr. and Mrs. Goforth:

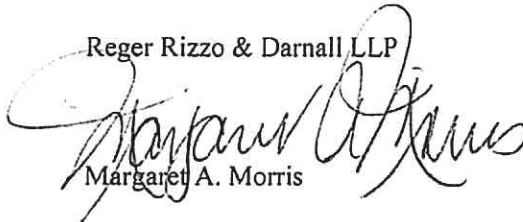
Enclosed is the Answer and New Matter of Pennsylvania Electric Company (Penelec) to your formal Complaint filed with the PA Public Utility Commission (PUC). Please note this is not a decision on your Complaint. Penelec's response includes a New Matter. If you do not reply to the New Matter within twenty (20) days, an unfavorable decision may be entered against you. Should you reply to the New Matter, you must forward a copy to me, counsel for Penelec, as set forth on the attached Notice to Plead.

The PUC will schedule either a settlement conference or a hearing on your complaint. The PUC will let you know, by mail, if there will be a settlement conference or a hearing and will include instructions on what to do next. If the matter is scheduled for hearing, the notice will provide you with information regarding the date, time and place of the hearing. If a hearing is scheduled, a judge will be at the hearing and make a decision on your complaint. If you have any questions about the hearing or you are unable to attend the hearing, you must contact the Public Utility Commission.

Thank you for your attention to this matter.

Very truly yours,

Reger Rizzo & Darnall LLP



Margaret A. Morris

MAM/jmm
Enclosure

cc: Lauren Lepkoski, Esquire, FirstEnergy Service Company

Attachment 3

1st page of 148-page Reply to Answer

PUC commission complaint filed Nov 24, 2015 rosmay chivatte, esquire sectary pa
public utility commission commonwealth keystone building 2 north p.o. box 3265
Harrisburg P.A 17105-3265 I forward a copy to Reger Rizzo Darnell attorney of law .

Re docket no C-3015 -2511735 Pamela & Stephen Goforth verses the Pennsylvania
Electric company Answers and new matters what's cause our electric to be unfair and not
upholding to legal laws of PA are as follows, Set for intention to Plea ! Marget morris
for penlec been forward a copy . dec 9th 2015

. I don't have to say anything bad about Muslims or Islam I'll just post you what's in the
Quran after I ask you one question What makes a Muslim a radical ? I would go as far
the say Muslims are madman, lunatic, oppressed unto madness being their possessed by
their god the devil Satan as a kill cult , Satan comes harm , to rob kill and destroy others
things possessions and liberties given to USA under out Confutation freedom from
forgeries, the Muslims being in our USA getting our resources is a curse to our nations
economy in resources diving-up inflation cost & prices in our everyday livelihood
sustainable substance human need in order to live as a people one a nation under God
indivisible with liberty & justice for all, by sin against he laws of God making us all,
accursed by the laws of God , being we having peace treaties& living – taxes state local
governmental, our requirements, living water food, property all affected so that we do
not do well , as in love life but &see good days if we keep the laws of God to not break
them See holy bible Deuteronomy 28 & 30 levicitious11 & Isaiah 66 , curses for breaking
the laws of God result is anguish and tribulation first corruption in the flesh and
afterwards death if not repented of and turned away from practicing living any longer in
that sin reaps when we break Gods laws under grace were not given full measure for out
sin or that would be death, in Jesus Christ were under grace having a propitiation for our
sin if we sin we can confess and forsake that sin and turn away from living any longer
therein to bring forth fruit meet for repentance is the Gospel Doctrine plus the earnestness
of our inheritance the infilling of the Holy Ghost who will take us into all truth and Gods
word is not lie , all the promise to us are yea and non nay, to us that's called upon Christ
for Salvation, whereby other nations Mexico and Honduras and Africa , Philippines,
Guatemala Honduras, Spain Dominican republic, Afghanistan, India, God Said all gifts
and calling are from God, don't intermarry with the Canaanites ! I believe that our
government having allowed slavery of Africans I believe are line of the Canaanites
was Satan working to rob , kill, & destroy putting a stumbling block into the way of
others to fall and sin against Gods laws , and make a larger melting pot of sin , I believe
Africans are that line of Canaanites because By the marked skin color blacks are dark , &
in night if moon wasn't shinning out, you might hit one of them & not seeing them hit
them with your buggy or car ore ect and they die , accident prone Darkness is tell tell
sign of pending troubles ,God said id we want to love life and see good days to keep
Gods laws, Bible said when people meet, God lightens the eye so we see what manner
of man we are . a accident which would be not a blessing of good day to love life
workings but a cursing & not on purposely caused a problem by troubling others into
others way to have a problem but bad a cursed day, under old testament and we have

Attachment 4

1st page of 148-page Reply to New Matter

May 16th 2016 I Sent 3 copy's to sectary of Pu C /o Judge Watson and forwarded Marget Morris copy's requested . by Judge Watson Penelc attorney. On May 20th 2016

PUC commission complaint filed Nov 24, 2015 rosmay chivatte, esquire sectary pa public utility commission commonwealth keystone building 2 north p.o. box 3265 Harrisburg P.A 17105-3265 I forward a copy to Reger Rizzo Darnell attorney of law .

Re docket no C-3015 -2511735 Pamela & Stephen Goforth verses the Pennsylvania Electric company Answers and new matters what's cause our electric to be unfair and not upholding to legal laws of PA are as follows, Set for intention to Plea ! Marget morris for penlec been forward a copy . dec 9th 2015

. I don't have to say anything bad about Muslims or Islam I'll just post you what's in the Quran after I ask you one question What makes a Muslim a radical ? I would go as far the say Muslims are madman, lunatic, oppressed unto madness being their possessed by their god the devil Satan as a kill cult , Satan comes harm , to rob kill and destroy others things possessions and liberties given to USA under out Confutation freedom from forgeries, the Muslims being in our USA getting our resources is a curse to our nations economy in resources diving-up inflation cost & prices in our everyday livelihood sustainable substance human need in order to live as a people one a nation under God indivisible with liberty & justice for all, by sin against he laws of God making us all, accursed by the laws of God , being we having peace treaties& living – taxes state local governmental, our requirements, living water food, property all affected so that we do not do well , as in love life but &see good days if we keep the laws of God to not break them See holy bible Deuteronomy 28 & 30 levicitious11 & Isaiah 66 , curses for breaking the laws of God result is anguish and tribulation first corruption in the flesh and afterwards death if not repented of and turned away from practicing living any longer in that sin reaps when we break Gods laws under grace were not given full measure for out sin or that would be death, in Jesus Christ were under grace having a propitiation for our sin if we sin we can confess and forsake that sin and turn away from living any longer therein to bring forth fruit meet for repentance is the Gospel Doctrine plus the earnestness of our inheritance the infilling of the Holy Ghost who will take us into all truth and Gods word is not lie , all the promise to us are yea and non nay, to us that's called upon Christ for Salvation, whereby other nations Mexico and Honduras and Africa , Philippines, Guatemala Honduras, Spain Dominican republic, Afghanistan, India, God Said all gifts and calling are from God, don't intermarry with the Canaanites ! I believe that our government having allowed slavery of Africans I believe are line of the Canaanites was Satan working to rob , kill, & destroy putting a stumbling block into the way of others to fall and sin against Gods laws , and make a larger melting pot of sin , I believe Africans are that line of Canaanites because By the marked skin color blacks are dark , & in night if moon wasn't shinning out, you might hit one of them & not seeing them hit them with your buggy or car ore ect and they die , accident prone Darkness is tell tell sign of pending troubles ,God said id we want to love life and see good days to keep Gods laws, Bible said when people meet, God lightens the eye so we see what manner of man we are . a accident which would be not a blessing of good day to love life workings but a cursing & not on purposely caused a problem by troubling others into