

Legal Department
2301 Market Street / S23-1
P.O. Box 8699
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Direct Dial: 215-841-6863

August 2, 2016

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

**RE: Mary Paul v. PECO Energy Company
Docket No. C-2015-2475355**

Dear Ms. Chiavetta:

Enclosed for filing with the Commission is PECO Energy Company's Identification of Expert Witnesses and Summary of Expert Witness Testimony.

The June 23, 2016 Prehearing Order in this matter, paragraph 1(b), designated today for identification of expert witnesses. PECO notes that it previously identified its expert witnesses in this matter by filing of June 16, 2016. A copy of the June 16 filing is attached to this letter and incorporated as PECO's instant witness identification; PECO is not changing the witness list provided in that prior filing.

Very truly yours,



Ward L. Smith
Counsel for PECO Energy Company

WS/ab
Enclosure

cc: Christopher P. Pell, ALJ
Darlene D. Heep, ALJ
Certificate of Service



An Exelon Company

Legal Department
2301 Market Street / S23-1
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Philadelphia, PA 19101 8699

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June 16, 2016

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

RE: Mary Paul v. PECO Energy Company
Docket No. C-2015-2475355

Dear Ms. Chiavetta:

Enclosed for filing with the Commission is PECO Energy Company's Identification of Expert Witnesses and Summary of Expert Witness Testimony.

Very truly yours,

A handwritten signature in cursive script, appearing to read "Ward L. Smith".

Ward L. Smith
Counsel for PECO Energy Company

WS/ab
Enclosure

cc: Christopher P. Pell, ALJ
Darlene D. Heep, ALJ
Certificate of Service

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Mary Paul

v.

PECO Energy Company

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C-2015-2475355

**PECO Energy Company's
Identification of Expert Witnesses and Summary of Expert Witness Testimony**

PECO has received a Prehearing Order in this matter dated April 22, 2016. Paragraph 1(b) of that Order requires that "On or before June 16, 2016, any party wishing to present expert testimony (medical, technical, etc.) must provide to the other party the name and business address of that expert and a written summary of the expected testimony of that expert.

PECO expects to call the following four expert witnesses whose testimony it will present at any evidentiary hearing in this matter:

Brenda Elson, Manager, Customer Care, PECO Energy Company. Business Address: PECO Energy Company, 2301 Market Street, Philadelphia, PA 19103. Ms. Elson will testify regarding the PECO process for notifying and working with customers regarding the change to AMI meters, as well as discussions and contacts between PECO and Ms. Paul.

Glenn Pritchard, Manager, Advanced Grid Operations, PECO Energy Company. Business Address: PECO Energy Company, 2301 Market Street, Philadelphia, PA 19103. Mr. Pritchard will testify regarding the design and operations of PECO's existing AMR meter system, including the radio frequency fields associated with that system. He will also testify regarding the design and operations of PECO's new AMI meter system, including the radio frequency fields associated with that system, and that the PECO AMI system is in compliance with all applicable FCC standards.

Christopher C. Davis, Ph.D., Professor of Engineering, University of Maryland. Business Address: University of Maryland, Electrical and Computer Engineering, 2124 Jeong H. Kim Engineering Bldg, College Park, MD 20742. Dr. Davis will testify to the methods for determining a person's exposure to radio frequency fields; whether there is an established biophysical/biological mechanism for how radio frequency fields from AMR or AMI systems could cause adverse effects in humans; and how the radio-frequency fields from PECO's existing AMR system and new AMI system compare to the FCC's radio-frequency exposure standards for those devices and also to radio frequency field exposures encountered in everyday life.

Dr. Mark Israel, M.D., Professor of Medicine, Dartmouth Medical School. Business Address: 1 Medical Center, Lebanon, NH 03756. Dr. Israel will testify about medical and scientific studies of radio frequency fields and health, and that there is no reliable medical or scientific basis for concluding that radio frequency fields from PECO's AMI meters will cause or contribute to adverse health effects generally or to the specific conditions identified by Complainant.

Respectfully submitted,



Ward Smith
Assistant General Counsel
PECO Energy Company
215-841-6863
ward.smith@exeloncorp.com

2016-06-16
Date:

Shawane Lee
Assistant General Counsel
PECO Energy Company
215-841-6841
shawane.lee@exeloncorp.com

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Mary Paul

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Docket No. C-2015-2475355

PECO Energy Company

CERTIFICATE OF SERVICE

I, Ward L. Smith, hereby certify that I have this day served a copy of PECO Energy Company's Identification of Expert Witnesses and Summary of Expert Witness Testimony via first class mail to:

Mary Paul
239 Honey Locust Drive
Avondale, PA 19311

Dated at Philadelphia, Pennsylvania, June 16, 2016



Ward L. Smith
Counsel for PECO Energy Company
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Philadelphia, PA 19101-8699
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PENNSYLVANIA
PUBLIC UTILITY COMMISSION

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Your filing has been electronically received. Upon review of the filing for conformance with the Commission's filing requirements, a notice will be issued acknowledging such compliance and assigning a Docket Number. The matter will receive the attention of the Commission and you will be advised if any further action is required on your part.

Print this page for your records. The date filed on will be the current day if the filing occurs on a business day before or at 4:30 PM Harrisburg, PA time. It will be the next business day if the filing occurs after 4:30 PM Harrisburg, PA time or on weekends or holidays.

If your filing exceeds 250 pages, you are required to submit one paper copy of the filing within 3 business days of submitting the electronic filing. This paper copy can be mailed to: Secretary, Pennsylvania Public Utility Commission, Commonwealth Keystone Building, 400 North Street, 2nd Floor, Harrisburg, PA 17120. Please print a copy of this page and attach it to the paper copy of your filing as the first page.

eFiling Confirmation	
Docket Number:	C-2015-2475355
Description:	Mary Paul - PECO Energy Company Identification of Expert Witnesses and Summary of Expert Witness Testimony
Transmission Date:	6/16/2016 10:55:23 AM
Filed On:	6/16/2016 10:55:23 AM
eFiling Confirmation Number:	1638293

Uploaded File List

File Name	Document Class	Document Type
Mary Paul - Identification of Expert Witnesses.pdf	Other Filing	Prehearing Memorandum

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Mary Paul

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Docket No. C-2015-2475355

PECO Energy Company

CERTIFICATE OF SERVICE

I, Ward L. Smith, hereby certify that I have this day served a copy of PECO Energy Company's Identification of Expert Witnesses and Summary of Expert Witness Testimony via first class mail to:

Mary Paul
239 Honey Locust Drive
Avondale, PA 19311

Dated at Philadelphia, Pennsylvania, August 2, 2016



Ward L. Smith
Counsel for PECO Energy Company
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Ward. Smith@exeloncorp.com