

Mary E Paul  
239 Honey Locust Drive  
Avondale, PA

August 31, 2016

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

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

Dear Ms. Chiavetta:

Enclosed for filing with the Commission is a request for accommodation for myself and my Expert Witness for my Hearing, scheduled for October 4<sup>th</sup> and 5<sup>th</sup>, mailed on this 31st day of August 2016 via certified mail in the matter referenced above to:

Christopher P. Pell, Administrative Law Judge  
Darlene D. Heep, Administrative Law Judge  
Suite 4063  
801 Market Street  
Philadelphia, PA 19107

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Very Truly Yours,



Mary E Paul  
Complainant

PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

Enclosure

cc: Ward Smith, Esquire  
Shawane Lee, Esquire  
Thomas Carl Watson, Esquire  
Exelon Business Services Company LLC  
Legal Department  
2301 Market Street, S23-1  
Philadelphia, PA 19103  
Certificate of Service

Mary E Paul  
239 Honey Locust Drive  
Avondale, PA

August 31, 2016

Hon. Christopher P. Pell, Administrative Law Judge  
Hon. Darlene D. Heep, Administrative Law Judge  
Suite 4063  
801 Market Street  
Philadelphia, PA 19107

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

PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

Your Honors:

As a pro se Complainant I am writing to request two accommodations for my hearing scheduled for October 4<sup>th</sup> and 5<sup>th</sup>.

1. My expert witness and consulting physician, Dr Hanoch Talmor, of Gainesville, FL., is unable to travel to Philadelphia due to a disability. Dr. Talmor's Affidavit of these facts is enclosed. I respectfully request that arrangements be made to allow Dr. Talmor to present his testimony via Skype, as was granted in another hearing (Maria Povacz v. PECO Energy, C-2015-2475023).

2. Due to my extreme electromagnetic sensitivity, I also respectfully request that I be allowed to participate via Skype or via telephonic hearing. I am not able to be in any area with a concentration of transmitting meters, and cellular communications and WiFi transmissions for even an hour without becoming ill and unable to think. This has affected my activities of daily living for the last two years after installation of AMI meters my area.

I originally objected to PECO's request to move my hearing, scheduled for August 16, to a September time frame. I needed my husband to accompany me, not only because I had every expectation of becoming ill, but also because I would need him to drive me to and from the hearing. My husband's schedule did not allow him the time to assist me from mid-August through September.

On June 16, I received a call from Ms. Cathy Niesporilla, asking if could move my hearing to July 26<sup>th</sup> and 27<sup>th</sup>. I declined. However, I suggested that if I could attend my hearing via Skype, I would be open to a September date, as PECO had requested, thus eliminating my exposure to EMFs/RFs and the need for my husband to accompany me.

I told Ms. Niesporilla I had researched the number of towers and antennas in the immediate vicinity of the hearing. The results of such a search usually show the number of towers and

antennas within a four-mile radius of a given location but the search came back for only a one-mile radius, due to the high number found. With the combination of antennas and towers, the probable WiFi in the building and people with cell phones, I did not know how I would be able to get through my hearing.

Ms. Niesporilla said that you were not set up for Skype, which I later found out was, in fact, possible. I also asked about the possibility of moving my hearing to Harrisburg because at least there were far fewer towers and antennas and transmitting meters. Ms. Niesporilla put me on hold and came back saying I could do a telephonic hearing.

I believed Ms. Niesporilla had called me on behalf of your Honors and thought the matter was settled. However, in the two letters I received after that call, no mention had been made of having a telephonic hearing. I called Ms Niesporilla two times two weeks apart, leaving a message about this issue and did not get a call back. I thought perhaps she had gone on vacation. A few days later I called her once again with a procedural question about a different matter and this time she returned my call within an hour. She did not give her name and so I asked to whom was I speaking and she said, "Cathy". I told Ms. Niesporilla I had been expecting a call back from her and asked again about why there had been no mention of a telephonic hearing. She then told me I would still need to write a letter.

Thus your Honors, based on the foregoing, and with fully a month before my hearing on October 4<sup>th</sup> and 5<sup>th</sup>, I respectfully request the accommodations as noted in #1 and #2 be granted.

Very truly yours,



Mary E. Paul  
Complainant

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PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

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

AFFIDAVIT OF HANOCH TALMOR, M.D.

1. My name is Hanoch Talmor. I am a medical doctor and the Director of the Gainesville Holistic Center. My business address is 4140-C NW 27<sup>th</sup> Lane, Gainesville, FL. 32606.
2. I am a witness in the case of Mary Paul v. PECO Energy Company, which is pending before the Pennsylvania Public Utility Commission at Docket No. C-2015-2475355.
3. I am scheduled to appear and present testimony in the Paul case on October 4-5, 2016. The hearings in the matter are set to take place in Philadelphia, PA.
4. I am unable to travel to Philadelphia for the Paul hearing due to a disabling medical condition that prevents me from traveling.
5. I am a disabled veteran of the Israeli Army.
6. In 1976, I suffered a serious leg injury as a result of stepping on a mine.
7. As a result of that injury, I developed a slow progressing hematoma, which impairs my ability to ambulate unassisted.
8. As a result of the injury, I developed a benign tissue growth on my leg that makes it difficult for me to get around.

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SECRETARY'S BUREAU

9. Since 2014, I have suffered from severe inflammation and bleeding, which requires changes of my wound dressing at least twice a day.


10. Attempting to walk exacerbates my injury and causes bleeding and great discomfort.

11. I am wheelchair bound most of the time, and I am unable to travel long distances.

12. Based on the above, I am requesting that I be allowed to testify in the Paul hearing via telephone, video conference or other method that would permit me to testify remotely.

The facts set forth are true and correct. I understand that the statements herein are made subject to the penalties of 10 Pa. C.S. section 4904 (relating to unsworn falsification to authorities.)

Date: August 25, 2016

  
Hanoch Talmor, M.D.

PENNSYLVANIA PUBLIC UTILITY COMMISSION

Mary Paul :  
Complainant :  
V : Docket No. C-2015-2475355  
PECO Energy Company :  
Respondent :  
:

CERTIFICATE OF SERVICE

I, Mary Paul, hereby certify that I have mailed, via certified mail, a copy of my request for Hearing accommodation in the matter referenced above to:


Christopher P. Pell, Administrative Law Judge  
Darlene D. Heep, Administrative Law Judge  
Suite 4063  
801 Market Street  
Philadelphia, PA 19107

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Dated at Kennett Square, PA this 31st day of August 2016

PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU



Mary E. Paul  
Complainant  
239 Honey Locust Drive  
Avondale, PA 19311

Enclosures

cc:  
Ward L. Smith, Esquire  
Shawane Lee, Esquire  
Thomas Carl Watson, Esquire  
Exelon Business Services Company LLC  
2301 Market Street, S23-1  
Philadelphia, PA 19103

**CERTIFIED MAIL**



Mary Paul  
239 Honey Locust Dr  
Avondale, PA 19311



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ROSEMARIE CHIAVETTA, SECRETARY  
PA PUC  
COMMONWEALTH KEYSTONE BUILDING  
400 NORTH STREET, SECOND FLOOR  
HARRISBURG, PA 17120

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