Mary E Paul
239 Honey Locust Drive
Avondale, PA

September 10, 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 my amended request for accommodation under the ADA for my hearing, scheduled for October 4th and 5th, via certified mail in the matter referenced above to:

Gladys M. Brown, Chairman, PUC
Andrew G. Place, Vice Chairman, PUC
David W. Sweet, Commissioner, PUC
Robert F. Powelson, Commissioner, PUC
John F. Coleman, Jr., Commissioner, PUC
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17120

Jan H. Freeman, Executive Director, PUC
Commonwealth Keystone Building
3rd Floor, N-309
400 North Street
Harrisburg, PA 17120

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

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2016 SEP 16 PM 2:40
PA PUC
SECRETARY'S BUREAU

Very Truly Yours,

Mary E Paul

Mary E Paul
Complainant

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

Cathy Niesporilla, ALJ Administrative Assistant
Suite 4063
801 Market Street
Philadelphia, PA 19107

Dr. Hanoch Talmor
Gainesville Holistic Center
4140-C NW 27th Lane
Gainesville, FL 32606

Certificate of Service

September 10, 2016

Gladys M. Brown, Chairman, PUC
Andrew G. Place, Vice Chairman, PUC
David W. Sweet, Commissioner, PUC
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Darleen P Heep, ALJ
Suite 4063
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RE: Mary Paul v. PECO Energy Company
PUC Docket No. C-2015-2475355

Dear Madams, Sirs, and Your Honors,

This is a request for reasonable accommodation under the ADA, Title II and also under Section 504 of the Rehabilitation Act of 1973. Please forward to responsible people for ADA Compliance and inform me to whomever you have forwarded this request and their contact information.

I am disabled with various symptoms diagnosed by my physician as Electrohypersensitivity (EHS). I have a hearing scheduled before the PUC Administrative Law Judges Heep and Pell on October 4th and 5th.

As a retired senior citizen, and pro se, I requested that I be allowed to attend my hearing via SKYPE or via a telephonic hearing due to my electromagnetic sensitivity, which has become far worse following the installation of AMI meters in my home area. 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.

My Expert Witness, Dr. Talmor, is also disabled under the ADA and under Section 504 of the Rehab Act of 1973. He cannot travel due to his disability. He is willing to participate in my hearing via SKYPE as I had requested, or by similar means.

It is a requirement of the federal government that the PUC provide teleconferencing for participation of my Expert Witness at the PUC's expense. (See enclosed federal government published Primer for ADA Compliance.)

I was informed yesterday via phone that my request for Dr Talmor to testify via SKYPE was approved but that I would have to make the arrangements and pay the cost myself. This is illegal under federal law, and to which the PUC has to comply.

History of the Request:

On June 2nd, 2016, I sent my objection to PECO's request to move my hearing, originally 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 from EMF exposure in Philadelphia, 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, Administrative Assistant, asking if could move my hearing to July 26th and 27th. 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 in Philadelphia. 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 the PUC was 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 there. Ms. Niesporilla put me on hold and came back saying I could do a telephonic hearing.

I thought the matter was settled. However, in the two documents I received after that (Prehearing Order and the Hearing Cancellation/Rescheduling Notice) no mention had been made of the approval for telephonic hearing. I just wanted confirmation in writing and some instructions regarding the telephonic process.

I called Ms Niesporilla twice, once on July 1st and once approximately two weeks later, leaving a message about my concerns. I never received a call back. I thought perhaps she had gone on vacation around the July 4th holiday. On July 29th, I called Ms. Niesporilla once again with a procedural question about a different matter regarding what documents to send and to whom for my Expert Witness notice. 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 her 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. I did not have the time for further discussion.

I was so upset and anxious at this turn of events, I put off writing that letter. I debated about what information to include because I was unsure how the information would be received. I spoke to another Administrative Assistant, Pamela McNeil, and while I was explaining that I had received a call to move my hearing, she happened to say that she did not know why Ms. Niesporilla would have called me. That concerned me even more. I finally resolved what to include in my letter and mailed it to Judges Heep and Pell with copies to the appropriate parties on August 31, 2016 that included a request for accommodation for Dr, Talmor's testimony.

On September 8th, much to my surprise, I received a call from Ms. Niesporilla. She confirmed that I had been granted a telephonic hearing back in June. She also said that I would have to make my own arrangements and pay for Dr Talmor to testify via Skype.

I asked her how I would go about doing that? Was there someone she could recommend? At this point I detected some agitation in her voice.

She said, "Look, I have spoken with you several times about this." I responded by saying, "No I've only spoken to you one other time when I called to ask about another issue and I asked you why I had not received any thing in writing about the telephonic hearing." She said it again and I responded nicely but firmly, "No, you must be confusing me with someone else." She responded that "Yes, we have and before I could say anything else, she said, " We are not going to go there, we're not going there", and then she hung up on me.

This has been very upsetting to me and I am requesting your guidance. I still do not have anything in writing from the PUC regarding my ability to attend my hearing telephonically or via teleconferencing. The only oral information I have received from the PUC regarding Dr. Talmor's testimony via SKYPE is not legal under the ADA Primer because it requires me to pay for and arrange it. If The PUC needs more time in order to arrange for my reasonable request for accommodation for Dr. Talmor, at their expense, we are willing to reschedule my hearing to a later time.

Respectfully Yours,

Mary E Paul

Mary E Paul
239 Honey Locust Drive
Avondale, PA 19311

Enclosure:

cc: Ward Smith, Esquire
Shawane Lee, Esquire
Thomas Carl Watson, Esquire
Exelon Business Services Company LLC
2301 Market Street, S23-1
Philadelphia, PA 19103
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Dr. Hanoch Talmor
Gainesville Holistic Center
4140-C NW 27th Lane
Gainesville, FL 32606

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 amended request for accommodation under the ADA for my hearing in the matter referenced above to:

Gladys M. Brown, Chairman, PUC
Andrew G. Place, Vice Chairman, PUC
David W. Sweet, Commissioner, PUC
Robert F. Powelson, Commissioner, PUC
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Harrisburg, PA 17120

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

Dated at Kennett Square, PA this 10th day of September 2016

Mary E Paul

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

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Dr. Hanoch Talmor
Gainesville Holistic Center
4140-C NW 27th Lane
Gainesville, FL 32606

PAUL
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AVONDALE, PA 19311

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