

COMMONWEALTH OF PENNSYLVANIA  
PUBLIC UTILITY COMMISSION

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Joan Greene,  
v.  
Metropolitan Edison  
Company,  
PUC Hearing  
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Docket No.: C-20029142

**DOCKETED**

OCT 15 2004

**DOCUMENT**

Keystone Building  
Conference Room, 2nd Floor  
400 North Street  
Harrisburg, PA 17105.

September 27, 2004  
Commencing at 10:00 a.m.

BEFORE:

SUSAN D. COLWELL, Administrative Law Judge

APPEARANCES:

JOAN GREENE, UNREPRESENTED BY COUNSEL  
845 Locust Street  
Mt. Wolf, PA 17347-9509  
For the Complainant

JEFFREY A. FRANKLIN, Esquire  
Ryan, Russell, Ogden & Seltzer, LLP  
Suite 330  
1105 Berkshire Blvd.  
Reading, PA 19610-1222  
For the Respondent

REC-1  
OCT 15 2004

**ORIGINAL**

REPORTER: MELISSA BEAM

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11  
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17  
18  
19  
20  
21  
22  
23  
24  
25

INDEX TO WITNESSES

<u>WITNESS</u>	<u>DIRECT</u>	<u>CROSS</u>	<u>REDIRECT</u>	<u>RECROSS</u>
Greene	8	14		
Lowe	26	48		
Stout	53	56	57	



P R O C E E D I N G S

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
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22  
23  
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JUDGE SUSAN D. COLWELL:

This is the time and the place set for a further telephonic hearing in the matter of Joan Greene versus Metropolitan Edison Company at Docket Number C-20029142. I'm Administrative Law Judge Susan D. Colwell, appointed by the Pennsylvania Public Utility Commission to preside in this matter.

I do have a Court Reporter present, so I ask that when you speak, you take turns because the phone lines will not allow both of your words to come through at the same time. And the Court Reporter can only take down one of you at a time.

I note for the record that the first hearing in this matter was held on February 12th, 2004, before Judge Michael Schnierle. He issued an initial Decision dismissing the Complaint on February 25th, 2004. Following exceptions filed by Ms. Greene and reply exceptions by the Company, the Commission remanded the matter to the Office of Administrative Law Judge for additional proceedings by its Order issued May 10th, 2004.

I note that the Complainant had filed motions on April the 5th, 2004 to which the Company

1 filed a response. These Motions were preliminary  
2 motions and were untimely filed and have been mooted  
3 by the remand of the Commission. The Complainant now  
4 has the opportunity to prove her case. The matter  
5 will not be decided on preliminary motions.

6 I have, on the line, contacted Joan  
7 Greene at the number she provided on her Complainant.  
8 And I also have on the line, Jeffrey Franklin and his  
9 witnesses for the Metropolitan Edison Company. I can  
10 hear both parties. Mr. Franklin, could you hear Ms.  
11 Greene?

12 ATTORNEY FRANKLIN:

13 Yes, Your Honor.

14 JUDGE COLWELL:

15 Ms. Greene, can you hear Mr. Franklin?

16 MS. GREENE:

17 Very clearly, Your Honor.

18 JUDGE COLWELL:

19 Wonderful. During this hearing, both  
20 sides will have the opportunity to present evidence in  
21 the form of sworn testimony or exhibits. And  
22 following the hearing, I will write and issue a  
23 decision, which is appealable to the Commission.

24 As you probably know, it is the  
25 Commission's policy to encourage settlements. If you

1 would like the opportunity to attempt to settle this  
2 matter without the formal hearing, I can have the  
3 Court Reporter stop transcribing, and I can leave the  
4 room so you can speak candidly with each other. I  
5 can't hang up the phone here without cutting both of  
6 you off, but I can leave the room and return in five  
7 or ten minutes to check on your progress. Ms. Greene,  
8 are you interested in a settlement?

9 MS. GREENE:

10 No, Your Honor.

11 JUDGE COLWELL:

12 All right. Then we'll continue with the  
13 hearing. Ms. Greene, you will present your case  
14 first. Since you do not have an attorney, I will be  
15 asking you some questions. But please understand, I'm  
16 not asking as your attorney. My job is to develop a  
17 complete record in the case. My questions will simply  
18 help me to do that.

19 When you finish, Mr. Franklin will ask  
20 you some questions, and then he will present his  
21 witnesses and will ask the witness some questions.  
22 After he is finished with each witness, you will have  
23 an opportunity to ask your questions of the Company's  
24 witness. Do you have any questions about what I just  
25 told you, Ms. Greene?

1                   MS. GREENE:

2                   No, ma'am. Your Court Order said that if  
3 I don't participate, I may lose the case.

4                   JUDGE COLWELL:

5                   That's correct.

6                   MS. GREENE:

7                   So I sat down and I drafted up six items  
8 over the whole case to present.

9                   JUDGE COLWELL:

10                  All right.

11                  MS. GREENE:

12                  And I would like to present those. I'm  
13 not used to speaking extemporaneously, so I've made  
14 notes and I would like to follow them and read them.

15                  JUDGE COLWELL:

16                  That would be fine.

17                  MS. GREENE:

18                  There are six items and a small wrap up.

19                  JUDGE COLWELL:

20                  Okay. That's fine. But first, let me  
21 swear you in. Will you raise your right hand, please?

22                  MS. GREENE:

23                  Yes, ma'am.

24 -----

25 JOAN GREENE, HAVING FIRST BEEN DULY SWORN, TESTIFIED

1 AS FOLLOWS:

2 -----

3 JUDGE COLWELL:

4 Please begin by stating your name and  
5 address for the record.

6 A. My name is Joan Greene, 845 Locust Street, Mount  
7 Wolf, Pennsylvania 17347-9505.

8 JUDGE COLWELL:

9 Okay. Continue with your case.

10 A. The six items. Number one, I believe that Met-Ed  
11 devised a scheme to defraud me on electricity  
12 consumption. A, by running my meter reading to a high  
13 false reading four different times. B, by recharging  
14 two different times for kilowatt hours already paid  
15 for.

16 JUDGE COLWELL:

17 Okay. Wait a minute. Give me time to  
18 take some notes; okay. Can you talk a little more  
19 slowly?

20 A. Honey, I can slow down.

21 JUDGE COLWELL:

22 That would be fine.

23 A. Number two, ---.

24 JUDGE COLWELL:

25 Wait a minute. Let's go back to B, it

1 was recharge what?

2 A. Would you like me to read number one again?

3 JUDGE COLWELL:

4 I would like that, yes.

5 A. I believe that Met-Ed devised a scheme to defraud  
6 me on electricity consumption. A, by running my meter  
7 reading to a high false reading four different times.  
8 B, by recharging two different times for kilowatt  
9 hours already paid for. Number two, I believe that  
10 Met-Ed devised a creative off-the-books accounting  
11 system scheme to cover up the fraud when caught by a  
12 consumer. Number three, I believe that Met-Ed  
13 executed those schemes against me as set forth in my  
14 Petition to the Court and confirmed in my accompanying  
15 five exhibits.

16 Number four, now, I petition this Court to accept  
17 into evidence my three-page Court Petition, signed and  
18 dated 06 Feb 2004, and all five accompanying exhibits  
19 in order to prove my case of alleged fraud and  
20 corrupt.

21 All parties have been in possession of these  
22 documents since February 2004. As confirmed receipt  
23 by the Honorable Michael C. Schnierle, Administrative  
24 Law Judge, in his initial Decision, dated 12 Feb 2004,  
25 at page two.

1       Number five, I properly served a copy for all  
2 parties as follows, through the Honorable Michael C.  
3 Schnierle, two copies for the Reporter, one copy for  
4 the Administrative Law Judge, one copy for the  
5 Presiding Officer, one copy for Mr. Jeffrey A.  
6 Franklin, Esquire, attorney for Met-Ed, from the law  
7 firm of Ryan, Russell, Ogden and Seltzer.

8       Further, I served a copy on Mr. Peter Burg, the  
9 Chief Executive Officer of First Energy, which is Met-  
10 Ed's parent company. To whom I was directed by Met-Ed  
11 headquarters, and one copy to Mr. James J. McNaulty,  
12 secretary of the Pennsylvania Public Utility  
13 Commission.

14       Each party received my three-page Court Petition  
15 and all five accompanying exhibits. To the best of my  
16 ability, everybody has everything. I set forth my  
17 case in minutia in my exhibits. So there's not too  
18 much more that I can add.

19       Finally, I will be happy to forward any further  
20 documentation you might need, such as my original  
21 monthly bills. I did not send them before because I  
22 had scribbled on them while writing up my case.  
23 However, I again certify that all the entries in my  
24 Petition, exhibits, exceptions and so forth are taken  
25 directly and verbatim from my original monthly bills.

1 I want and need from Met-Ed a summary of my account  
2 based solely on those original monthly bills for  
3 electricity consumption, not on the special bills and  
4 not on the rebills. Because Met-Ed has been carrying  
5 \$77.11 on my original monthly bills, which have never  
6 been explained for me and I have not yet paid. But I  
7 would like to pay if I am shown that I honestly owe  
8 this \$77.11.

9 I want to clear up this depressing matter and get  
10 it out of my life. Also, Met-Ed never explained the  
11 \$200 payment, which I mailed to Mr. Peter Burg with my  
12 Complaint when Met-Ed tacked a 48-hour shut-off notice  
13 to my door while not responding to my complaint  
14 letters. I felt that was unfair and I felt Met-Ed was  
15 harassing me for filing the Complaint in writing. My  
16 \$200 was received because it was cashed and cleared my  
17 bank. So I cannot understand how I still owe the  
18 \$77.11.

19 But most importantly, I have not been shown in  
20 black and white on my original monthly bills exactly  
21 where Met-Ed credited my account for those six  
22 overcharges, totaling 9,240 kilowatt hours and \$837.55  
23 as shown in Exhibit Number Four. I want to see those  
24 specific original monthly bills. But Met-Ed cannot  
25 show them to me because Met-Ed used its creative off-

1 the-books accounting to hide them from me, as clearly  
2 shown in my Exhibit Number One titled chart money  
3 trail showing Met-Ed's falsification of balance due.  
4 And my Exhibit Number Two, titled chart meter reading  
5 trail showing Met-Ed's falsification of meter  
6 readings.

7       So I have no way of verifying how much I owe, or  
8 perhaps Met-Ed owes me. My last item, number six, I  
9 do not believe the six overcharges were made by a low-  
10 level meter reader, because he probably would have  
11 been fired after six mistakes on one person's billing.

12 I believe the fraud cover up and falsification on my  
13 records was a conspiracy from higher up on Mahogany  
14 Road. That is why I dubbed it, quote, The Brown  
15 Mahogany theory. The scheme was very clever and it  
16 took me a while to figure out. Not until I had  
17 drafted up a handwritten chart of the figures on my  
18 bills did the falsification of the records pop out and  
19 startle me. It was like a bolt of lightning the day I  
20 discovered multiple falsifications on my chart.

21 I discovered that Met-Ed manipulated the data  
22 secretly and retroactively while transferring it  
23 from last month's bill to this month's bill. All  
24 hidden. All without telling the customer on its bill  
25 that the adjustments have been made by Met-Ed.

1 In conclusion, I petition this Court to make Met-  
2 Ed's creative off-the-books accounting illegal and  
3 make Met-Ed stop and desist using it. I petition this  
4 Court to direct Met-Ed to record any and all  
5 adjustments they make into the section of their bill  
6 entitled, quote, detailed payments and adjustment  
7 information. Or better yet, a separate and new  
8 section entitled, quote, adjustment information,  
9 setting forth all adjustments in both kilowatt hours  
10 and dollars.

11 As a customer and consumer, I need to be able to  
12 verify what manipulation Met-Ed has done to the  
13 figures on my previous bill without going through the  
14 gyrations I have to now. Thank you, Your Honor, for  
15 your time.

16 JUDGE COLWELL:

17 Wait. Don't go anywhere, Ms. Greene.  
18 That was a nice presentation, but now we go on to the  
19 next part. Mr. Franklin?

20 ATTORNEY FRANKLIN:

21 Thank you, Your Honor. Met-Ed did not  
22 receive any exhibits for this hearing; however, we did  
23 at the initial hearing receive a package of materials  
24 from the Administrative Law Judge. They were from Ms.  
25 Greene as she referenced. And there were Exhibits One

1 through Five, I believe that's what she was making  
2 reference to during her testimony. I just wanted to  
3 make it clear that while Met-Ed did not receive any  
4 exhibits for this hearing, we do have copies of those  
5 from a prior hearing. I assume that's what she's  
6 referring to; is that correct, Ms. Greene?

7 A. Yes, Mr. Franklin. And I assume that you received  
8 those at the hearing on 12 February 2004?

9 ATTORNEY FRANKLIN:

10 That's right.

11 A. And you were given them by the Honorable Judge  
12 Schnierle?

13 ATTORNEY FRANKLIN:

14 That's right.

15 A. Thank you.

16 CROSS EXAMINATION

17 BY ATTORNEY FRANKLIN:

18 Q. Ms. Greene, did you receive a package of documents  
19 from me, dated September 23rd, Proposed Stipulations  
20 and Met-Ed Exhibits One through Six?

21 A. September 23rd?

22 Q. Yes.

23 A. You mean September 23, 2004?

24 Q. Correct.

25 A. No, sir. I've received nothing. How did you send

1 them? By regular mail?

2 Q. Okay. They were sent by overnight to you.

3 A. I'm sorry, did you send them by regular mail?

4 Q. No, by United Parcel Service, overnight.

5 A. Sir, I was out all day Friday shopping, and when I  
6 came home, there was --- you know how they stick the  
7 sticky notices on the door that they attempted  
8 delivery?

9 Q. Yes.

10 A. And they just said it was envelope. They did not  
11 tell me who it was from or anything else. But there  
12 was an attempted delivery on Friday the --- what would  
13 that have been --- Friday, the 24th.

14 Q. So you did not refuse my mail this time, you just  
15 weren't available?

16 A. Yes, Mr. Franklin, that's true.

17 Q. You have refused my mail and prior correspondence  
18 to you; is that correct?

19 A. On one occasion, yes.

20 ATTORNEY FRANKLIN:

21 Your Honor, it appears that the  
22 Complainant has not received Met-Ed's exhibits. How  
23 would you wish to proceed? I presume Your Honor has  
24 them.

25 JUDGE COLWELL:

1 Yes, I do. Well, why don't you explain  
2 to Ms. Greene what they are.

3 ATTORNEY FRANKLIN:

4 Okay.

5 BY ATTORNEY FRANKLIN:

6 Q. Ms. Greene, in the package which is pending for  
7 you, is a ---.

8 A. I'm sorry. Are you talking about the package that  
9 was tried to deliver?

10 Q. That's correct.

11 A. Okay. Go ahead.

12 Q. The first document included in that package is  
13 entitled, Proposed Stipulations of Metropolitan Edison  
14 Company. It consists of eight questions. These were  
15 the questions in your Complaint that you wanted  
16 answered.

17 A. You answered those, sir.

18 Q. Excuse me?

19 A. You answered those for me.

20 Q. Yes. That's correct. And it has the answers.

21 A. And sir, I do want to thank you. I appreciated  
22 that.

23 Q. Thank you. This document is dated February 12th,  
24 2004. The answers are the same ones that you seen  
25 before, when we were exchanging letters back and forth

1 at the hearing.

2 A. Right.

3 Q. These are the same answers that you've seen. It's  
4 the same questions, the same answers.

5 A. Okay.

6 Q. Okay?

7 A. Uh-huh (yes).

8 Q. The next document is a one-page document, Met-Ed  
9 Exhibit Number One. That's an August 6, 2002 letter  
10 from Brian Lowe of Met-Ed to you. Do you have a copy  
11 of that in your file there?

12 A. It's filed away somewhere. That's with my  
13 grievance. I filed a grievance about that to Mr.  
14 Burg.

15 Q. Right. And this is ---.

16 A. And you and I discussed that offhand, you know.

17 Q. And this is Mr. Lowe's response to you. So you  
18 would have a copy of that somewhere there?

19 A. I don't have it in front of me right now, but I  
20 acknowledged it, yes. There was something and I filed  
21 a grievance with Mr. Burg about it. So there's  
22 extended material on it.

23 Q. Okay. And the next one is Met-Ed Exhibit Number  
24 Two. This is another letter from Mr. Lowe to you,  
25 dated August 9th, 2002, regarding the 4,300 kilowatt

1 hours. Okay. Do you happen to have a copy of that in  
2 your file handy?

3 A. No, I don't, sir.

4 Q. Do you have it somewhere in your file?

5 A. Because this stuff is older, you know. And the  
6 information on it was not true and that's why I wrote  
7 to Mr. Burg and filed the complaint.

8 Q. Okay. I understand your position.

9 A. I mean, that's my position, you know.

10 Q. Right. The next exhibit is Met-Ed Exhibit Number  
11 Three. This is an account statement for your account.

12 A. Wait, wait, wait. Number Three.

13 Q. Right. Met-Ed Exhibit Number Three ---.

14 A. So this is a summary of my account?

15 Q. This is the rows and columns with the service to,  
16 the days, the reading, the type, kilowatt hours, bill  
17 payment, late charges, due date, payment date, payment  
18 adjustments and balance. I sent you previously these  
19 account statements. We have gone through a few  
20 different ones. And this is just the most up-to-date  
21 one.

22 A. You sent me two, sir, which is referenced in my  
23 exhibit, --- which one?

24 Q. Yes, that's right. I sent you just earlier  
25 versions. We just updated since several months had

1 passed. The next one is Met-Ed Exhibit Number Four,  
2 which is a dial card that you sent to Met-Ed.

3 JUDGE COLWELL:

4 Excuse me, both of you. Ms. Greene, you  
5 have to wait until he asks the question.

6 A. All right. I'm sorry.

7 JUDGE COLWELL:

8 That's okay.

9 A. I just wanted to say it was Exhibit Number Four.  
10 Go ahead. But you're talking about what I'm going to  
11 get?

12 BY ATTORNEY FRANKLIN:

13 Q. That's correct.

14 A. See, I'm getting confused here.

15 Q. I'm just going through the documents with you ---

16 A. Okay.

17 Q. --- that we have sent to you.

18 A. So this is a new account summary?

19 Q. Just an updated account summary. Otherwise, it's  
20 the same as what you had before. All the parts are  
21 the same as you've seen.

22 A. Now, wait. It's an updated account summary?

23 Q. That's correct. That was number ---.

24 A. That was the same figures as before?

25 Q. That's correct. Same figures as before.

- 1 A. Yeah.
- 2 Q. Including the rebills as you seen before and that  
3 you had concerns about.
- 4 A. That's what I object to, sir.
- 5 Q. And it shows the \$77.11 balance due also, just  
6 like we were talking about.
- 7 A. Yes. So that's confirmed.
- 8 Q. Yes, that's Number Three. Number Four, is a meter  
9 dial card that you sent to Met-Ed, and that's dated 20  
10 August 2003.
- 11 A. Okay.
- 12 Q. Met-Ed Exhibit Number Five, is a letter and report  
13 from the District Attorney of the County of York in  
14 response to your Complaint to them, dated December 26,  
15 2002. This is from H. Stanley Rebert.
- 16 A. Yes.
- 17 Q. Addressed to you. Did you receive a copy of that,  
18 ma'am?
- 19 A. Yes, sir.
- 20 Q. Okay. And the attachments that they had to their  
21 report.
- 22 A. I didn't get any attachments. I wrote back and  
23 asked for them and never got any attachments.
- 24 Q. Okay.
- 25 A. May I have those?

1 Q. Sure. You already will. Basically, there is a  
2 letter and a memorandum. And attached to the  
3 memorandum ---.

4 A. Sir? Sir, there's a knock on my door, and the UPS  
5 said they'd deliver. May I go get it?

6 Q. Yes, please.

7 A. Hold on.

8 SHORT BREAK TAKEN

9 A. Mr. Franklin?

10 BY ATTORNEY FRANKLIN:

11 Q. Yes, Ms. Greene?

12 A. I have this package from Ryan, Russell, Ogden and  
13 Seltzer to Joan Greene.

14 Q. Perfect. If you could open that up. The final  
15 Met-Ed Exhibit is a one-page document. It's a meter  
16 test for the meter for your account.

17 ATTORNEY FRANKLIN:

18 Your Honor, if we could have those marked  
19 for identification purposes as described.

20 JUDGE COLWELL:

21 Yes. You already have them marked, and  
22 the markings are fine.

23 (Met-Ed's Exhibits Numbers

24 One through Six, marked

25 for identification).

1                    ATTORNEY FRANKLIN:

2                    Thank you, Your Honor. And perhaps we  
3 can give Ms. Greene a moment to review the package?

4                    JUDGE COLWELL:

5                    Sure, no problem. I'll tell you what,  
6 why don't we just go off the record for five minutes.  
7 I'm going to leave the line open, but I will be  
8 leaving the room.

9                    ATTORNEY FRANKLIN:

10                   Very good. Thank you, Your Honor.

11 SHORT BREAK TAKEN

12                   JUDGE COLWELL:

13                   Let's go back on the record right now and  
14 we can continue where we --- did you have enough time  
15 to review the Exhibits?

16 A. No, I didn't, because I feel I should have gotten  
17 these before now, not while I'm here at the --- he  
18 should have provided these to me earlier. I shouldn't  
19 be put on the spot of having to stand and rip this  
20 open and try to read them. I've written down what he  
21 --- I tried to write down here what he has said. But  
22 what I started to say, I'd be happy to read them and  
23 answer any interrogatories he may have.

24                   JUDGE COLWELL:

25                   Ma'am, the time for interrogatories is

1 well past. It's time for the hearing. Now, you're  
2 either ready ---.

3 A. Then why is he sending me this package late?

4 JUDGE COLWELL:

5 He didn't. He sent it last week. Now,  
6 the point is, are you asking me for a continuance ---  
7 let me speak.

8 A. I'm sorry.

9 JUDGE COLWELL:

10 Are you asking me for a continuance?

11 A. Yes. And I'm asking why I received this not three  
12 days prior to this hearing?

13 JUDGE COLWELL:

14 Mr. Franklin?

15 ATTORNEY FRANKLIN:

16 Yes, Your Honor. Met-Ed sent the  
17 exhibits in a timely fashion via UPS overnight to the  
18 Complainant and to Your Honor. Met-Ed cannot control  
19 whether the Complainant is there to receive them at  
20 her residence. All Met-Ed can do is, in a timely  
21 fashion, send the required materials at the required  
22 time to the proper address, which it's done. Met-Ed  
23 believes that a further continuance in this matter  
24 would be inappropriate, that has already attended one  
25 in-person hearing, which the Complainant did not

1 attend, is now prepared for this telephonic hearing at  
2 the Complaint's request. It's time to pursue with the  
3 hearing, Your Honor.

4                   In addition, Met-Ed notes that we went  
5 through the various exhibits. These are not new  
6 materials to the Complainant. These are materials  
7 that the Complainant has all --- that she's received  
8 each of these materials previously and there's nothing  
9 new here to her. She's had sufficient time to review  
10 the materials and should be prepared to proceed this  
11 morning.

12 A. You said they were the same materials, but  
13 updated, sir. I need to look them over. And --- may  
14 I say something, please? The Order says that all  
15 copies must be received at least three days before the  
16 hearing. I did not receive these three days before  
17 the hearing.

18                   JUDGE COLWELL:

19                   Ms. Greene, the Complainant (sic) is not  
20 responsible for whether or not you were there to  
21 receive them. He can only send them in a timely  
22 fashion.

23 A. But he ---.

24                   JUDGE COLWELL:

25                   Ms. Greene, here's what we're going to

1 do.

2 A. What makes ---.

3 JUDGE COLWELL:

4 I'm going to give you five more minutes  
5 to look at these and then we're going to continue.  
6 We're off the record.

7 SHORT BREAK TAKEN

8 JUDGE COLWELL:

9 We're back on the record. Please  
10 continue, Mr. Franklin.

11 ATTORNEY FRANKLIN:

12 Thank you, Your Honor. Met-Ed calls  
13 Brian E. Lowe.

14 JUDGE COLWELL:

15 Mr. Lowe, will you raise your right hand,  
16 please?

17 MR. LOWE:

18 Yes, Your Honor.

19 -----

20 BRIAN E. LOWE, HAVING FIRST BEEN DULY SWORN, TESTIFIED  
21 AS FOLLOWS:

22 -----

23 JUDGE COLWELL:

24 Thank you. Go ahead, Mr. Franklin.

25 DIRECT EXAMINATION

1 BY ATTORNEY FRANKIN:

2 Q. Mr. Lowe, would you state and spell your name for  
3 the record, please?

4 A. My name is Brian, middle initial, E, Lowe, L-O-W-  
5 E.

6 Q. And what is your business address?

7 A. My business address is 2800 Pottsville Pike,  
8 Reading, PA 19512.

9 Q. And by whom are you employed and in what capacity?

10 A. I am employed by Metropolitan Edison Company, a  
11 First Energy Company, as the director of customer  
12 service.

13 Q. And how long have you been employed by Met-Ed?

14 A. I've been employed by Met-Ed for approximately 34  
15 years.

16 Q. And how long have you been in your current  
17 position, Mr. Lowe?

18 A. I've been in my current position as director of  
19 customer service for approximately three years.

20 Q. And could you briefly describe your present job  
21 responsibilities and duties?

22 A. My current responsibilities are for meter reading,  
23 credit collections and customer service.

24 Q. And would you briefly describe your educational  
25 background?

1 A. My education includes a Bachelor of Science Degree  
2 from Baldwin-Wallace College in Cleveland, Ohio. And  
3 a Master's of Business Administration Degree from  
4 Baldwin-Wallace College in Cleveland, Ohio.

5 Q. And have you had an opportunity to review and  
6 become generally familiar with the complaint that has  
7 been filed against Met-Ed by Ms. Greene?

8 A. Yes, I have.

9 Q. And Mr. Lowe, I'd like to direct your attention to  
10 a document from Met-Ed entitled Proposed Stipulations  
11 of Metropolitan Edison Company. It's a four-page  
12 document, dated February 12th, 2004. Do you have a  
13 copy of that document?

14 A. Yes, I do.

15 Q. If I were to ask you these same eight questions  
16 this morning, would your answers be the same?

17 A. Yes, they would.

18 Q. Mr. Lowe, I'd like to direct your attention to  
19 what has been marked for identification purposes as  
20 Met-Ed Exhibit Number One.

21 (Met-Ed Exhibit Number  
22 One marked for  
23 identification).

24 BY ATTORNEY FRANKLIN:

25 Q. Are you sponsoring this Exhibit for purposes of

1 the hearing this morning?

2 A. Yes, I am.

3 Q. And would you briefly describe this Exhibit,  
4 please?

5 A. Exhibit Number One is a letter, dated August 6,  
6 2002 from me, addressed to Ms. Joan Greene.

7 Q. And what was this letter regarding?

8 A. This letter was regarding the complaint that Ms.  
9 Greene wrote to Pete Burg, and my attempts to contact  
10 her to address her complaint.

11 Q. And when Ms. Greene's complaint letter was sent to  
12 Mr. Burg, why was it directed to your attention?

13 A. It is my responsibility as a director of customer  
14 service to investigate and follow up complaints for  
15 customers relating to billing, collection, meter  
16 reading.

17 Q. And in this case, when Met-Ed received a complaint  
18 from Ms. Greene, did Met-Ed investigate her complaint?

19 A. Yes, we did.

20 Q. And is this letter representative of that  
21 investigation?

22 A. Yes, it is.

23 Q. Mr. Lowe, I'd like to direct your attention to  
24 what has been marked for identification purposes as  
25 Met-Ed Exhibit Number Two.

1 (Met-Ed Exhibit Number  
2 Two marked for  
3 identification).

4 BY ATTORNEY FRANKLIN:

5 Q. Are you sponsoring this Exhibit for purposes of  
6 the hearing this morning?

7 A. Yes, I am.

8 Q. Would you briefly describe this exhibit, please?

9 A. This is a second letter that I wrote to Ms. Greene  
10 in attempt to, again, address the concerns that she  
11 outlined in a letter to Mr. Pete Burg.

12 Q. And did you also attempt to contact the  
13 Complainant by telephone?

14 A. Yes, I did.

15 Q. And were you successful in those attempts?

16 A. No, I was not.

17 Q. And was that the purpose of the follow-up letter  
18 then?

19 A. Yes, it was.

20 Q. And attached to Met-Ed Exhibit Number Two is a  
21 spreadsheet. Can you describe briefly what that is,  
22 please?

23 A. Yes. It is a spreadsheet that I personally  
24 developed in an effort to try to answer the questions  
25 that Ms. Greene had.

1 Q. And that was provided to her as an attachment to  
2 your August 9th, 2002 letter; is that correct?

3 A. Yes, it was.

4 Q. I'd like to direct your attention to what has been  
5 marked for identification purposes as Met-Ed Exhibit  
6 Number Three.

7 (Met-Ed Exhibit Number  
8 Three marked for  
9 identification).

10 BY ATTORNEY FRANKLIN:

11 Q. Do you have a copy of that? Are you sponsoring  
12 this Exhibit for the purposes of this hearing this  
13 morning?

14 A. Yes, I have a copy, and yes, I am sponsoring it.

15 Q. And would you please describe this exhibit,  
16 please?

17 A. Yes, this is intended to be a detailed explanation  
18 of the activity that happened on Mrs. Greene's account  
19 from November 27, 2001 through August 25 of 2004.

20 Q. And could you identify for us those three months  
21 that were in dispute in the Complaint in this matter?

22 A. Yes. The three months that were in dispute were  
23 January, February and March 2002.

24 Q. And what page are they on the exhibit?

25 A. They are on the first --- page one of three of

1 this exhibit.

2 Q. And what was the earliest meter reading that was  
3 not in dispute that is reflected on this exhibit?

4 A. The December 24, 2001 meter reading was not in  
5 dispute by Mrs. Greene.

6 Q. And what was that meter reading?

7 A. That meter reading was 447.

8 Q. And what was the next meter reading that was not  
9 in dispute?

10 A. The next meter reading that was not in dispute was  
11 April 23rd, 2002.

12 Q. And what was the meter reading on that date?

13 A. That meter reading was 556.

14 Q. And was that an actual or estimated reading?

15 A. The reading on April 23rd, 2002 was an actual  
16 reading.

17 Q. And was the meter reading on December 24th, 2001  
18 an actual or estimated reading?

19 A. The reading of December 24th, 2001 was an actual  
20 meter reading.

21 Q. How do you calculate the kilowatt hours that were  
22 used between those two meter reading points, the 447  
23 and the 556?

24 A. To calculate the kilowatt hours, we would subtract  
25 the current reading of 556 from the previous reading

1 of December 24th of 447 with the difference being 109.  
2 We would multiple that 109 times a multiplier of 40 to  
3 come up with the kilowatt hours Mrs. Greene was billed  
4 between December 24th, '01 and April 23rd, '02.

5 Q. And what's that result?

6 A. 4,350 kilowatt hours.

7 Q. So that would be the actual kilowatt hours used  
8 for that entire period?

9 A. Yes. That would be the actual kilowatt hours used  
10 from December 24th, 2001 through April 23rd, 2002.

11 Q. Mr. Lowe, directing your attention again to the  
12 three bills in dispute that you just referenced from  
13 January, February and March of 2002, can you explain  
14 what happened there, please?

15 A. Yes. It is apparent that there was a meter  
16 reading error on January 25th, 2002. That meter  
17 reading error resulted in Mrs. Greene receiving a high  
18 bill.

19 Q. And did she receive just one high bill?

20 A. No. She received three high bills.

21 Q. And why was that?

22 A. There was a meter reading error, again, on January  
23 25th of 2002. When we read the meter on January 25th,  
24 excuse me, on February 25th, 2002, when the meter  
25 reader entered the reading at that time, because of

1 the previously wrong reading of January 25th, 2002,  
2 the meter readers handheld unit would have beeped,  
3 indicating that he may have --- he or she may have  
4 read that meter incorrectly and the meter reader  
5 entered a second reading.

6 The same thing happened on March 25th, 2002. When  
7 they read the meter, if the meter reading taken at  
8 that time, March 25th of 2002, was lower than the  
9 previous month's reading, the meter reading handheld  
10 unit would have provided an auditable beep, indicating  
11 a possible meter reading error and the meter reader  
12 would have entered a second meter reading.

13 Q. And did the Complainant bring to Met-Ed's  
14 attention these high bills and the suspected meter  
15 reading problem?

16 A. Yes, she did.

17 Q. And did Met-Ed investigate her complaint?

18 A. Yes, we investigated her complaint.

19 Q. And what was the result of that investigation?

20 A. The investigation indicated that the meter  
21 readings were wrong for January, February and March.  
22 And as a result, we rebilled her account for January,  
23 February and March 2002 based on an actual meter  
24 reading obtained.

25 Q. And can you direct our attention on Met-Ed Exhibit

1 Number Three where those rebills are indicated?

2 A. The rebills are indicated about mid-way on the  
3 page, indicated by a type of E, referencing an  
4 estimate, showing January 25th, 2002, of 447 as the  
5 meter reading and E for an estimated code and kilowatt  
6 hours being 1200. The same thing for February 25th,  
7 2002 and March 25th, 2002.

8 Q. And under the kilowatt hours, each of these three  
9 rebills, what are the kilowatt hours that were used?

10 A. Yes. These are the estimated kilowatt hours based  
11 on the actual reading taken to resolve Mrs. Greene's  
12 high bill complaint.

13 Q. And is the use of rebills consistent with the  
14 Commission's regulations and the company's tariff fund  
15 filed with and approved by the Commission, as well as  
16 Met-Ed's internal policies?

17 A. Yes. The method used is consistent with PUC  
18 approved procedures, as well as Met-Ed's rebilling  
19 procedures.

20 Q. And when Met-Ed determined that there was an  
21 inaccurate meter reading, does Met-Ed just leave the  
22 inaccuracy in the account and continue to bill the  
23 customer an inappropriate amount?

24 A. No, we do not. We adjust the meter reading as  
25 well as the billing, and we send out an adjusted bill

1 to the customer.

2 Q. And that adjusted bill is often called a rebill?

3 A. Yes, it is. It is called a rebill.

4 Q. And on the face of the bill, does it say rebill?

5 A. Yes, it does.

6 Q. And then directing your attention again to April  
7 23rd, 2002, and you had stated the reading was 556 at  
8 that time; is that correct?

9 A. That is correct.

10 Q. And was the meter reading, was this an actual or  
11 estimated meter reading?

12 A. The meter reading of April 23rd, 2002 was an  
13 actual meter reading.

14 Q. And now that there was an accurate meter reading,  
15 do you believe that the rebills were correct as  
16 billed?

17 A. Yes, I do. I believe the rebills based on the  
18 actual meter reading were correct as billed.

19 Q. And were the original three bills in dispute  
20 correct as they were billed?

21 A. The original bill?

22 Q. Correct.

23 A. The January 25th, February 25th and March 25t, '03  
24 (sic) original bills were incorrect.

25 Q. And that's why the rebills were issued; is that

1 correct?

2 A. That is why the rebills were issued, that is  
3 correct.

4 Q. And did the complainant pay the original three  
5 bills that were incorrect?

6 A. No, she did not.

7 Q. And if she would have paid the original three  
8 bills, what would have happened?

9 A. If Mrs. Greene had paid the original incorrect  
10 bills, she would have actually had a credit for those  
11 payments made and we would have obviously made the  
12 adjustment by giving her a credit for any overpayments  
13 she made on her account based on the rebill.

14 Q. And after the rebills were issued, did Ms. Greene  
15 pay those rebills or subsequent current bills in full?

16 A. No, she did not.

17 Q. Did she make some payments towards her account and  
18 what were the payments as reflected on Met-Ed Exhibit  
19 Number Three, both prior to and during the contested  
20 period and then after that?

21 A. Okay. Looking at the record, going back ---.

22 Q. I'm sorry, which column are you looking at?

23 A. I'm looking at the payment and adjustment column,  
24 as well as the payment date column. The second from  
25 the right and the third from the right. And this is,

1 again, the billing statement that was provided, which  
2 reflects our records. It shows on February 7th, 2002,  
3 a payment of \$100. It also shows on February 27th,  
4 2002, a payment of \$295.83. It shows an adjustment on  
5 April 9th of 2002. And there's a footnote with that  
6 of \$679.65. And that is showing the corrected bills  
7 covering the period from December 24th, 2001 through  
8 March 25th, 2002.

9 The next payment that we show would be May 30th,  
10 2002, for \$65.09, which would have been the May 22nd,  
11 2002 bill only. We show the next payment being July  
12 2nd, 2002, which would have been the June 22nd, 2002  
13 billing only. And then we show on July 29th, 2002, a  
14 payment of \$200 towards the unpaid balance.

15 Q. And directing your attention to page two of Met-Ed  
16 Exhibit Number Three, with respect to --- on the left-  
17 hand side, service to, date of September 23rd, 2003,  
18 there was an estimated bill and a reading of 999 that  
19 the Complainant had addressed in her testimony. Can  
20 you explain for us what happened here and specifically  
21 reference the exhibit, please?

22 A. Yes. We had a relatively bad storm around this  
23 date in 2003. And as a result, we were unable to read  
24 the meter. However, Mrs. Greene provided us with a  
25 dial card with, what we consider a customer provided

1 reading. Considering that that customer provided  
2 reading Mrs. Greene provided, ---.

3 Q. Excuse me, Mr. Lowe. If I could interrupt for a  
4 moment. I direct your attention to Met-Ed Exhibit  
5 Number Four.

6 (Met-Ed Exhibit Number  
7 Four marked for  
8 identification).

9 BY ATTORNEY FRANKLIN:

10 Q. Are you sponsoring this Exhibit for purposes of  
11 the hearing this morning?

12 A. Yes, I am.

13 Q. And can you describe this Exhibit, please?

14 A. Yes. This is a copy of a dial card that has a  
15 customer provided reading. The reading, again, was  
16 provided by Mrs. --- we believe, Mrs. Greene.

17 Q. I'm sorry. Go ahead and continue to provide the  
18 explanation with respect to the September 23rd, 2003  
19 estimate, please?

20 A. Okay. Looking at that dial card that Mrs. Greene  
21 provided, she indicated that she obtained a reading on  
22 August 20th, 2003. However, the billing date was  
23 August 23rd, 2003. Her reading provided of 993 on  
24 August 20th, 2003 was before the actual billing date.  
25 So based on the customer provided reading, we took

1 that and added, or added the additional time to bring  
2 it up from September 20th (sic) to September 23rd  
3 (sic), and that's why we have a difference of six or  
4 999 versus her provided reading of 993.

5 Q. And ---

6 MRS. GREENE:

7 May I ask ---?

8 ATTORNEY FRANKLIN:

9 After we're done ---.

10 MRS. GREENE:

11 But I'll never remember all this. I  
12 don't believe I sent in that dial card, and I'd like  
13 to have a copy of that, please. The one that says ---  
14 he said I had sent in one for 993. I do not believe  
15 that's true. Please send me a copy.

16 ATTORNEY FRANKLIN:

17 You do. Met-Ed Exhibit Number Four in  
18 your package, Ms. Greene. May I continue, Your Honor?

19 JUDGE COLWELL:

20 Yes, go ahead.

21 ATTORNEY FRANKLIN:

22 Thank you.

23 BY ATTORNEY FRANKLIN:

24 Q. Mr. Lowe, with respect to the estimated reason,  
25 what did Met-Ed determine as far as the accuracy of

1 that estimated reading?

2 A. We determined that that estimated reading was  
3 another high reading. In other words, the billing was  
4 incorrect again.

5 Q. And what did Met-Ed when it's determined that  
6 there is an improper estimated meter read here?

7 A. We obtained an actual reading and rebilled the  
8 account for --- the next line you'll see on that,  
9 indicated as rebill, September 23rd. We rebilled that  
10 with a reading of 905 for 440 kilowatt hours versus  
11 the reading of 999 and 4,200 kilowatt hours.

12 Q. And did Met-Ed provide a credit again for the  
13 incorrectly estimated September 23rd, 2003 amount?

14 A. Yes, we did. The September 23rd, 2003 amount for  
15 4,200 kilowatt hours equated to \$361.03. We canceled  
16 the \$361.03 off of her account and rebilled her for  
17 \$43.88 for that same period.

18 Q. And that's reflected on Met-Ed Exhibit Number  
19 Three?

20 A. Yes, it is.

21 Q. And what was the next actual meter reading that  
22 Met-Ed received?

23 A. The next actual reading that Met-Ed received was  
24 October 24th, 2003.

25 Q. And what was that meter reading as reflected on

1 this Exhibit?

2 A. Meter reading of 917 for 480 kilowatt hours,  
3 \$47.25.

4 Q. And Mr. Lowe, do you believe that the rebill  
5 amount was correct?

6 A. Yes, I do believe the rebill amount for 9/23/03  
7 was correct.

8 Q. And Mr. Lowe, directing your attention to the  
9 balance due column of this Exhibit, can you explain  
10 the \$77.11 that repeatedly shows throughout this  
11 Exhibit, where that comes from as the Complainant  
12 referenced earlier in her testimony?

13 A. Yes. The \$77.11 balance due is a result of taking  
14 in consideration all the billings to Mrs. Greene with  
15 the corrected billing, giving her credit for the  
16 payments she made and the unpaid balance would be that  
17 \$77.11 figure.

18 Q. And Mr. Lowe, is it your testimony then that Mrs.  
19 Greene owes Met-Ed \$77.11 for current electric service  
20 that has been rendered in addition to whatever current  
21 bills are still pending?

22 A. Yes. As of this August 25th, 2004 statement, our  
23 records show that her account balance is \$77.11.

24 Q. But there may be a current bill that could be  
25 issued at any time ---

1 A. Correct.

2 Q. --- that would be added to that?

3 A. Correct.

4 Q. And Mr. Lowe, is Met-Ed currently assessing late  
5 payment charges on that \$77.11 that is disputed?

6 A. No, we are not.

7 MRS. GREENE:

8 I'm sorry, I didn't hear that.

9 A. I said no, we are not.

10 MRS. GREENE:

11 But what's the question?

12 ATTORNEY FRANKLIN:

13 Met-Ed is not assessing late payment  
14 charges on that \$77.11.

15 MRS. GREENE:

16 Okay. Thank you, sir.

17 BY ATTORNEY FRANKLIN:

18 Q. Mr. Lowe, I'm going to direct your attention to  
19 what has been marked for identification purposes as  
20 Met-Ed Exhibit Number Five.

21 (Met-Ed Exhibit Number  
22 Five marked for  
23 identification).

24 BY ATTORNEY FRANKLIN:

25 Q. Are you sponsoring this Exhibit?

1 A. Yes, I am.

2 Q. And would you briefly describe this Exhibit,  
3 please?

4 A. This Exhibit Number Five is a copy of a letter  
5 that I received from the Commonwealth of Pennsylvania  
6 as a result of a complaint that Mrs. Greene wrote to  
7 the District Attorney.

8 Q. And what was the conclusion of the District  
9 Attorney's investigation?

10 A. The conclusion based on my reading of this letter,  
11 is that the overcharges were merely a mistake and have  
12 been rectified by Met-Ed. And that there does not  
13 seem to be a pattern of overcharging as Mrs. Greene  
14 indicated.

15 Q. And are you paraphrasing from a portion of that  
16 Exhibit?

17 A. Yes, I am. From the last paragraph on the first  
18 page, near the bottom, I am paraphrasing from that  
19 portion of this letter.

20 Q. Are you referring to the first page of the  
21 memorandum, second page in the Exhibit?

22 A. I'm sorry, yes, I am.

23 ATTORNEY FRANKLIN:

24 Thank you, Mr. Lowe. Your Honor, Mr.  
25 Lowe is available for any questions you may have or

1 Cross Examination.

2 JUDGE COLWELL:

3 Thank you. Ms. Greene, do you have any  
4 questions for Mr. Lowe?

5 MRS. GREENE:

6 I was not able to follow this because I  
7 got a whole jumble in front of me that was dumped on  
8 me the last minute here. And I would like to address  
9 them when I get a copy of the transcript, so I can  
10 compare them to the documents. In going through his  
11 testimony, when he brings up --- the only thing that  
12 really strikes me is when he brings up the 999  
13 reading. I believe it was September --- and he said I  
14 sent him a dial card. I know that that wasn't --- as  
15 far as the reading and rise in the meter readings,  
16 that was ten fold what the rise was in August. And I  
17 have August laid out in the Complaint. And  
18 unfortunately, I'm disqualified --- compromised here  
19 because I was not able to have that in front of me  
20 because I didn't have it, their exhibits.

21 JUDGE COLWELL:

22 Ma'am, if you would like Mr. Green (sic)  
23 to explain this section again, I'm sure he would be  
24 happy to do that.

25 MRS. GREENE:

1 I cannot do that at this moment, because  
2 I don't have my documents in front of me because I was  
3 served this three days before this hearing, and I  
4 object. But I would like to respond. I would like to  
5 ask you, do I automatically get a transcript of this  
6 hearing?

7 JUDGE COLWELL:

8 No, you do not. You have to pay for it.

9 MRS. GREENE:

10 Oh, okay. Can I get one?

11 JUDGE COLWELL:

12 You can get one. After the hearing, you  
13 can arrange with our Court Reporter here, and she will  
14 work that out with you.

15 MRS. GREENE:

16 Okay. And she will give me the address?  
17 Because I feel there are inaccuracies here, and I  
18 would like to address them. And I can refer you to  
19 grievances that I had filed on all these things, and  
20 there's so much paperwork. My side has already been  
21 laid out, but there's so much paperwork at this last  
22 minute, I cannot pull these things forward. So I  
23 would like the opportunity to do that.

24 ATTORNEY FRANKLIN:

25 Your Honor, Met-Ed would object to any

1 further factual testimony following the close of the  
2 record today.

3 JUDGE COLWELL:

4 Ms. Greene, Mr. Franklin is correct. You  
5 were given opportunities to prepare your case long in  
6 advance. Now, you have right here ---.

7 MRS. GREENE:

8 But I never ---.

9 JUDGE COLWELL:

10 Ma'am, ---

11 MRS. GREENE:

12 Your Honor, ---.

13 JUDGE COLWELL:

14 --- I'm talking. We have Mr. Lowe right  
15 here who has just testified. He is available for you  
16 to ask questions to on the record, right now. Do you  
17 have any questions for Mr. Lowe?

18 MRS. GREENE:

19 No. Because unfortunately, I have not  
20 been able to look at the many pages document here and  
21 I'm very disadvantaged, ma'am.

22 JUDGE COLWELL:

23 I understand your point of view, ma'am;  
24 however, ---.

25 MRS. GREENE:

1                   And I make a motion that you discharge  
2 their exhibits here because they did not timely serve  
3 them on me three days ahead of time.

4                   JUDGE COLWELL:

5                   Denied.

6                   MRS. GREENE:

7                   That's the end of mine.

8                   JUDGE COLWELL:

9                   Thank you. Now, Mr. Lowe, I believe that  
10 Ms. Greene would like for you to explain once again  
11 what happened when we have 999 reading, which on my  
12 page occurs on 9/23/03.

13 A. The meter readings, Your Honor, Mrs. Greene,  
14 progresses.

15 CROSS EXAMINATION

16 BY MRS. GREENE:

17 Q. What was the August reading, sir?

18 A. The meter reading on August 22rd, 2003 was 984.  
19 Again, on September 23rd, ---.

20 Q. So that's 100 jump; right? It comes up to 42 some  
21 odd kilowatt hours?

22 A. Yes, Mrs. Greene.

23 Q. That's a tremendous jump. That's why I filed a  
24 grievance. And of course, the charges were  
25 tremendous.

1 A. Okay. If I may continue, Mrs. Greene. On  
2 September 2003, we did not read your meter because we  
3 were restoring the services of our customers as a  
4 result of the extensive storm damage at that time.  
5 However, we received from you on August 25th, 2003, as  
6 indicated on Met-Ed Exhibit Number Four, a dial card  
7 with a reading that you provided. On that dial card,  
8 you indicated that you obtained that reading on August  
9 20th, 2003. We took that reading of 993 and advanced  
10 it to accommodate the additional days in the billing  
11 period ---.

12 Q. I understand that, sir. I'm just saying I'm not  
13 sure that I forwarded that.

14 MRS. GREENE:

15 So we're not going to iron this out now  
16 because I can't go through this packet of documents  
17 cold turkey. But I would like to get with the  
18 Reporter and get a copy of all your testimony, and  
19 then I would like to send you some questions so we can  
20 work this out.

21 JUDGE COLWELL:

22 Ma'am, that's not the way it works.

23 MRS. GREENE:

24 Oh, I'm sorry.

25 JUDGE COLWELL:

1                   That's okay. I'm happy to explain the  
2 procedure to you. But once you get this point, this  
3 is the hearing. This is your chance to ask all your  
4 questions. When this hearing ---.

5                   MRS. GREENE:

6                   Well, I'm ---.

7                   JUDGE COLWELL:

8                   Excuse me, ma'am. Please allow me to  
9 finish. The Court Reporter can only get one person  
10 speaking at a time, and that would be me.

11                   Now, when the hearing is over, your  
12 opportunity to get information through this formal  
13 proceeding is over. What you can do is, I can give  
14 you an opportunity to file a Memorandum of Law  
15 afterwards, where you try to convince me again that  
16 you are correct and tell me why. And Mr. Franklin  
17 also has the opportunity to do the same thing. But  
18 that's it. We don't take additional testimony or  
19 additional evidence after this record is done today.

20                   If you have something else that you want  
21 to talk to the company about, you can do that separate  
22 from this proceeding. Now, you may speak.

23                   MRS. GREENE:

24                   May I ask for information on this  
25 Memorandum of Law since I'm not allowed to correct

1 this information in which was thrown at me. I  
2 shouldn't have even answered the door.

3 JUDGE COLWELL:

4 It wouldn't have mattered, ma'am.  
5 Because you had the opportunity to get these and they  
6 were ---.

7 MRS. GREENE:

8 No, I didn't. I didn't get them until  
9 today.

10 JUDGE COLWELL:

11 Excuse me, I'm not arguing with you.  
12 This is the way I see it. You had an opportunity,  
13 whether or not you had them in hand is not the fault  
14 of the company here. And the company has a right to  
15 see this to an end as well. Now, we want this to be  
16 correct, as correct as possible. And if I thought in  
17 any way that going forward today would disadvantage  
18 you, we would not do it. However, all of the  
19 procedural niceties have been followed here.

20 You are not at a disadvantage. You did  
21 have copies of everything except the most recent dates  
22 on the Met-Ed account statement. You know what those  
23 are, they're not even at issue here. So what we're  
24 doing is listening to what you have to say and  
25 listening to how the company believes things happened

1 and then it will be submitted to me for my opinion of  
2 what happened. Now, to that end, do you have anymore  
3 questions for Mr. Lowe?

4 MRS. GREENE:

5 I would like to make one last statement.  
6 I do not want to talk to Mr. Lowe now because I hadn't  
7 been able to read these updated --- as Mr. Franklin  
8 said, these updated Exhibits, which I just received.  
9 But I would like to make one statement.

10 JUDGE COLWELL:

11 Ma'am, I'll tell you what.

12 MRS. GREENE:

13 Please, ---.

14 JUDGE COLWELL:

15 Mr. Franklin has an additional witness.  
16 And at the end of that time is the appropriate time  
17 for statements to be made. So let's have him give us  
18 one more witness, and then you can tell me whatever  
19 you'd like and I won't interrupt you. How about that?  
20 Mr. Franklin, please continue.

21 ATTORNEY FRANKLIN:

22 Thank you, Your Honor. Metropolitan-  
23 Edison Company calls Robert Stout.

24 JUDGE COLWELL:

25 Mr. Stout, will you raise your right

1 hand, please?

2 -----

3 ROBERT M. STOUT, HAVING FIRST BEEN DULY SWORN,  
4 TESTIFIED AS FOLLOWS:

5 -----

6 JUDGE COLWELL:

7 Thank you. Go ahead, Mr. Franklin.

8 ATTORNEY FRANKLIN:

9 Thank you, Your Honor.

10 DIRECT EXAMINATION

11 BY ATTORNEY FRANKLIN:

12 Q. Mr. Stout, would you state and spell your name for  
13 the record, please?

14 A. My name is Robert M. Stout. That is spelled  
15 S-T-O-U-T.

16 Q. And what is your business address?

17 A. My business address is 2800 Pottsville Pike,  
18 Reading, Pennsylvania 19512.

19 Q. And by whom are you employed and in what capacity?

20 A. I'm employed by Metropolitan-Edison Company.

21 Q. And what is your title?

22 A. I am the manager of meter services for Met-Ed.

23 Q. And how long have you been employed by Met-Ed?

24 A. I've been employed for 21 years.

25 Q. With Metropolitan-Edison Company?

1 A. That is correct.

2 Q. And would you briefly describe your present job  
3 responsibilities and duties?

4 A. I'm responsible for all aspects of the electrical  
5 meter reading within the Met-Ed organization, with the  
6 exception of the areas that Mr. Lowe is responsible  
7 for.

8 Q. And would you briefly describe your educational  
9 background, please?

10 A. I have a Bachelor's of Science Degree in  
11 Electrical Engineering from Wagner University.

12 Q. And have you had an opportunity, to become  
13 generally familiar with the Complaint that has been  
14 filed against Met-Ed by Ms. Greene?

15 A. Yes, I have.

16 Q. Mr. Stout, are you sponsoring what has been marked  
17 for identification purposes as Met-Ed Exhibit Number  
18 Six for this hearing this morning?

19 (Met-Ed Exhibit Number  
20 Six marked for  
21 identification).

22 A. That is correct.

23 BY ATTORNEY FRANKLIN:

24 Q. And would you briefly describe Met-Ed Exhibit  
25 Number Six, please?

1 A. Met-Ed Exhibit Number Six is a record of an  
2 electrical kilowatt hour meter test conducted on the  
3 meter that serves Joan Greene at 845 Locust Street,  
4 Mount Wolf, PA.

5 Q. And this is the electric service account of the  
6 Complainant?

7 A. Yes.

8 MRS. GREENE:

9 I'm sorry, I'm not hearing this.

10 BY ATTORNEY FRANKLIN:

11 Q. If you could speak up, please.

12 MRS. GREENE:

13 Yes. I'm sorry, please speak up.

14 A. I'm sorry.

15 BY ATTORNEY FRANKLIN:

16 Q. Is this the electric service meter that serves the  
17 Complainant, Mr. Stout?

18 A. Yes, it is.

19 Q. And what were the results of the meter test?

20 A. The results of the meter test indicate that the  
21 meter tested with a weighted average of 99.86 percent.

22 Q. And is that in compliance with the Commissions  
23 regulations?

24 A. Yes it is.

25 Q. And based on this meter test, Mr. Stout, do you

1 believe that the Complainant's meter is functioning  
2 normally and registering the kilowatt hours usage in  
3 accordance with the Commission regulations and  
4 accurately?

5 A. Yes, it is.

6 Q. Thank you, Mr. Stout.

7 ATTORNEY FRANKLIN:

8 Mr. Stout is available for any questions  
9 you may have, Your Honor, or Cross Examination.

10 MRS. GREENE:

11 No Cross Examination because of I'm not  
12 prepared.

13 JUDGE COLWELL:

14 Mr. Stout, help me out here. When did  
15 you do the test on the meter?

16 A. Your Honor, this test was conducted on September  
17 11th of 1998.

18 JUDGE COLWELL:

19 So there's nothing more recent than that?

20 A. No, Your Honor.

21 JUDGE COLWELL:

22 Okay.

23 ATTORNEY FRANKLIN:

24 Just a couple of follow up, Your Honor?

25 JUDGE COLWELL:

1 Sure.

2 REDIRECT EXAMINATION

3 BY ATTORNEY FRANKLIN:

4 Q. Mr. Stout, how often does Met-Ed typically test,  
5 or when does Met-Ed typically test residential  
6 kilowatt hour meters?

7 A. The particular model of meter that is on the  
8 premise of the Complainant is in a form that is tested  
9 every 16 years by the requirements within the Public  
10 Utility Commission.

11 Q. Thank you, Mr. Stout.

12 ATTORNEY FRANKLIN:

13 Your Honor, Met-Ed --- if there's nothing  
14 further, Met-Ed would move for the admission of Met-Ed  
15 Exhibits One through Six.

16 MRS. GREENE:

17 I'm sorry, I cannot understand. You're  
18 speaking low.

19 ATTORNEY FRANKLIN:

20 This is Jeff Franklin. I just move for  
21 the admission of Met-Ed Exhibits One through Six.

22 JUDGE COLWELL:

23 Ms. Greene, you have an opportunity to  
24 object to any of these Exhibits.

25 MRS. GREENE:

1 I object strenuously, because I just  
2 received some of them, what, five minutes ago?

3 JUDGE COLWELL:

4 Okay. Your objections are overruled, and  
5 they are admitted. Now, let's talk about your  
6 exhibits. We have --- I want to make sure they're  
7 properly identified and admitted to the record. Let  
8 me see where I put them. Okay.

9 The first thing we have, Ms. Greene, is a  
10 cover letter that you do not have marked as an  
11 exhibit. Do you want that to be admitted to the  
12 record?

13 MRS. GREENE:

14 Now, what are we talking about? What's  
15 the date?

16 JUDGE COLWELL:

17 Your exhibits. I do not have a date on  
18 the first letter. It's 6th of February, 2004 on the  
19 bottom of the second page.

20 MRS. GREENE:

21 To the Honorable Michael C. Schnierle?

22 JUDGE COLWELL:

23 That's correct.

24 MRS. GREENE:

25 Yes. That's my Petition to the Court.

1                   JUDGE COLWELL:

2                   Do you want that to be admitted?

3                   MRS. GREENE:

4                   Yes, I entered that earlier.

5                   JUDGE COLWELL:

6                   Then we're going to have to mark it.

7                   MRS. GREENE:

8                   Oh, okay.

9                   ATTORNEY FRANKLIN:

10                  Your Honor?

11                  JUDGE COLWELL:

12                  Yes.

13                  ATTORNEY FRANKLIN:

14                  Met-Ed would object to the letter being  
15 admitted as an exhibit. It appears to be essentially  
16 testimony which she reiterated from today and had the  
17 opportunity to testify today.

18                  JUDGE COLWELL:

19                  Yes, she did. And since it was testified  
20 to, I think we will admit it and we'll take it for the  
21 value that it offers us. It will be admitted as  
22 Complainant Exhibit Number Six.

23                  (Complainant Exhibit Number

24                  Six marked for

25                  identification).

1                   JUDGE COLWELL:

2                   All right.

3                   MRS. GREENE:

4                   And that's the three-page document to the  
5 Honorable Judge Schnierle?

6                   JUDGE COLWELL:

7                   I only have two pages, ma'am.

8                   MRS. GREENE:

9                   There's a third page, that's an index.

10                  JUDGE COLWELL:

11                  Okay. All right. Then we start your  
12 Exhibit Number One, which says chart-money trial  
13 showing Met-Ed's falsification of balance due.

14                  MRS. GREENE:

15                  Just a second, I'm trying to find  
16 everything here. Exhibit Number One, go ahead.

17                  (Complainant Exhibit Number  
18 One marked for  
19 identification).

20                  JUDGE COLWELL:

21                  Okay. Are you going to object to any of  
22 these, Mr. Franklin?

23                  ATTORNEY FRANKLIN:

24                  The only two to the extent that there's  
25 legal conclusions here, Your Honor; otherwise, Met-Ed

1 has no objections.

2 JUDGE COLWELL:

3 Okay. Then we'll just identify them.  
4 Exhibit Number Two ---.

5 MRS. GREENE:

6 Wait. Exhibit Number One was what?

7 JUDGE COLWELL:

8 It's your chart, money trial showing Met-  
9 Ed's falsification of balance due.

10 MRS. GREENE:

11 Okay. Exhibit what number?

12 JUDGE COLWELL:

13 That is --- it's a cover sheet and you  
14 have two pages.

15 MRS. GREENE:

16 Right.

17 JUDGE COLWELL:

18 Now, Exhibit Number Two, chart - meter  
19 reading trial showing Met-Ed's falsification of ---.

20 MRS. GREENE:

21 But wait. I'm sorry. I'm missing ---.  
22 My Exhibit Number One the money trial showing Met-Ed's  
23 falsification of balance due, what Court Exhibit is  
24 it?

25 JUDGE COLWELL:

1 Well, we're using your markings, ma'am.  
2 So it's Exhibit Number One.

3 MRS. GREENE:

4 But you told me the other one was Number  
5 One.

6 JUDGE COLWELL:

7 No, no. I told you that your cover  
8 letter will be Complainant Exhibit Number Six. This  
9 one is your Exhibit Number One.

10 MRS. GREENE:

11 Oh, I'm sorry. I'm so sorry.

12 JUDGE COLWELL:

13 No, that's okay. I'm happy to explain.

14 MRS. GREENE:

15 I'm just very confused. I got it. Now,  
16 I got you. Okay. Exhibit Number One.

17 JUDGE COLWELL:

18 I thought it would be easier to use your  
19 markings.

20 MRS. GREENE:

21 Very good.

22 JUDGE COLWELL:

23 So we'll use your --- Exhibit Number One  
24 is a cover sheet and two pages.

25 MRS. GREENE:

1 Right.

2 JUDGE COLWELL:

3 Your Exhibit Number Two, the meter  
4 reading trial showing Met-Ed's falsification of meter  
5 readings is a cover sheet and one page.

6 (Complainant Exhibit Number  
7 Two marked for  
8 identification).

9 MRS. GREENE:

10 Yes, ma'am.

11 JUDGE COLWELL:

12 Your Exhibit Number Three, monthly  
13 payments showing timely electricity consumption  
14 payments by Joan Greene is a cover sheet and one page.

15 (Complainant Exhibit Number  
16 Three marked for  
17 identification).

18 MRS. GREENE:

19 Yes, ma'am.

20 JUDGE COLWELL:

21 Your Exhibit Number Four, status letter  
22 to the secretary Pennsylvania Public Utility  
23 Commission, 8 December, 2003, a cover sheet and one,  
24 two, three, four pages.

25 (Complainant Exhibit Number

1 Four marked for  
2 identification).

3 MRS. GREENE:

4 Now, wait. Is this Exhibit Number Three?

5 JUDGE COLWELL:

6 Number Four, ma'am.

7 MRS. GREENE:

8 Oh, my Exhibit Number Four, okay.

9 JUDGE COLWELL:

10 Yes.

11 MRS. GREENE:

12 Okay. I got a cover sheet and one, two,  
13 three, four pages.

14 JUDGE COLWELL:

15 Okay. Now, we have your Exhibit Number  
16 Five.

17 (Complainant Exhibit Number  
18 Five marked for  
19 identification).

20 MRS. GREENE:

21 And that is addressed to the secretary of  
22 the PPUC.

23 JUDGE COLWELL:

24 Yes, it is.

25 MRS. GREENE:

1 Okay. So that's Court Number Four?

2 JUDGE COLWELL:

3 Complainant's Exhibit Number Four.

4 That's to differentiate from the Met-Ed's exhibit  
5 numbers. Okay? You can use Complainant or you can  
6 use Greene if it's easier for you. You have a set of  
7 exhibits, Mr. Franklin has a set of exhibits. I have  
8 the same numbers, but different introductory names.

9 MRS. GREENE:

10 Oh, I see.

11 JUDGE COLWELL:

12 Okay?

13 MRS. GREENE:

14 All right. Thank you.

15 JUDGE COLWELL:

16 Sure. Your Exhibit Number Five is the  
17 formal complaint letter to Mr. Peter Burg, Chief  
18 Executive Officer, First Energy, 5 November, 2003. I  
19 have the cover sheet and three pages.

20 MRS. GREENE:

21 Yes, ma'am.

22 JUDGE COLWELL:

23 Is that the total of your exhibits?

24 MRS. GREENE:

25 So that's Court Exhibit Number Five for

1 Greene?

2 JUDGE COLWELL:

3 That's the Complainant Exhibit Number  
4 Five.

5 MRS. GREENE:

6 Okay, ma'am. Thank you very much.

7 JUDGE COLWELL:

8 Okay. Do you want your official  
9 Complaint to be admitted into the record as well?

10 MRS. GREENE:

11 Yes, I want both of them. The original  
12 one I wrote, and offhand, I forget the date because I  
13 don't have that in front of me.

14 JUDGE COLWELL:

15 Okay. Let's see. I have a Complaint  
16 from you that's dated as being received in the  
17 Secretary's Borough on December the 24th, 2002, which  
18 is fairly lengthy. We've got numerous attachments.  
19 Mr. Franklin, do you have any objection to admitting  
20 that into the record?

21 ATTORNEY FRANKLIN:

22 No, Your Honor. As long as Met-Ed's  
23 Answer there is also entered into the record.

24 JUDGE COLWELL:

25 Okay. We're going to mark the Complaint,

1 the Complainant's Exhibit Number Seven.

2 (Complaint Exhibit Number  
3 Seven marked for  
4 identification).

5 JUDGE COLWELL:

6 And Met-Ed's Answer.

7 ATTORNEY FRANKLIN:

8 And Proposed Stipulations, Your Honor.

9 JUDGE COLWELL:

10 Do you want to mark those separately?

11 ATTORNEY FRANKLIN:

12 Sure. Met-Ed's Exhibit --- whatever  
13 number you're on, seven or eight?

14 JUDGE COLWELL:

15 Met-Ed Exhibit - how many did you give  
16 me?

17 ATTORNEY FRANKLIN:

18 We're up to six previously, Your Honor.

19 The Answer, that could be Seven, and Proposed  
20 Stipulations, Eight?

21 (Met-Ed Exhibit Numbers  
22 Seven and Eight marked for  
23 identification).

24 JUDGE COLWELL:

25 Okay. All right. Then ---.

1           MRS. GREENE:

2           Is it my turn?

3           JUDGE COLWELL:

4           Sure.

5           MRS. GREENE:

6           Okay. I wrote an original Complaint to  
7 the PPUC ---

8           JUDGE COLWELL:

9           Yes.

10          MRS. GREENE:

11          --- dated 06 October '02. It was  
12 received on 15 October '02. And I referenced this in  
13 exception number eight in my exceptions. I would like  
14 that --- that's the very first one I wrote to the  
15 Commission.

16          JUDGE COLWELL:

17          Okay. Your exceptions and the  
18 attachments to it are already in the record.

19          MRS. GREENE:

20          I especially want that letter attached.

21          JUDGE COLWELL:

22          Yes. If it's attached to your  
23 exceptions, it's in the record.

24          MRS. GREENE:

25          I don't think I attached it. I figured

1 the Commission would have it, because it was my very  
2 first initial appeal to them.

3 JUDGE COLWELL:

4 Well, it's a very kind assumption for  
5 you, ma'am, but it's not necessarily true.

6 ATTORNEY FRANKLIN:

7 Your Honor, Met-Ed would object to the  
8 inclusion of any further documents than the already  
9 substantial materials we have in the record that  
10 haven't otherwise been discussed with testimony in the  
11 hearing today.

12 JUDGE COLWELL:

13 I believe that the record, as we have  
14 established it today, is more than sufficient, Ms.  
15 Greene.

16 MRS. GREENE:

17 Okay, Your Honor.

18 JUDGE COLWELL:

19 All right. Then all of the Exhibits are  
20 hereby admitted. I will take them for the value that  
21 they offer. Ms. Greene, would you have a final  
22 statement for me?

23 MRS. GREENE:

24 Yes, I have one.

25 JUDGE COLWELL:

1 Go ahead.

2 MRS. GREENE:

3 But first, I want to thank you for being  
4 very patient with me. Of course, I'm very nervous.

5 JUDGE COLWELL:

6 It's just my job, ma'am.

7 MRS. GREENE:

8 And further, I'd like to really thank you  
9 for bringing me up to the 21st century. I was a legal  
10 secretary most of my career, and I loved it. But that  
11 was many years ago. And I didn't know that I could  
12 have a telephonic court appearance. So I apologize  
13 for not asking for that back in December. And I thank  
14 you for bringing me up to date. And I would like to  
15 make one last statement, which you told me earlier I  
16 could say at the end.

17 JUDGE COLWELL:

18 Go ahead.

19 MRS. GREENE:

20 Is this the end?

21 JUDGE COLWELL:

22 This is the end.

23 MRS. GREENE:

24 Okay. The letter from the PUC, dated  
25 July 22, 2004, it says a Telephone Hearing on

1 Remand/Judge Change Notice. It says on page two,  
2 quote, if you have any hearing exhibits to which  
3 you'll refer during the hearing, three copies must be  
4 sent to the Administrative Law Judge and one copy each  
5 must be sent to every other party. All copies,  
6 underlined, must be received at least three days,  
7 underlined, before the hearing.

8 I did not receive them. I just received  
9 them a few minutes ago, and I object to their  
10 exhibits. I might not object to them once I look at  
11 them, but Mr. Franklin said these were updated. And I  
12 had not had a chance to look at them. And I think  
13 that's unfair, Your Honor.

14 And I'm pleased to have met with you.  
15 And I thank you for your patience and for being so  
16 generous with me. And also, to Mr. Franklin, I'd like  
17 to say that I have enjoyed talking to him, and to Carl  
18 Ingleman (phonetic). And that I hope that we can iron  
19 this out.

20 And if he --- I'll tell you what I'm  
21 going to do. I'm going to go ahead and send the  
22 \$77.11. I don't understand, just like I said in my  
23 opening statement. I don't understand it, but in ---  
24 this is really bothering me. It's destroying my  
25 quality of life. So I'm going to pay that \$77.11 and

1 hope that they agree that this has been rolling  
2 forward every month because I didn't understand it. I  
3 paid each month for the electricity consumption, on  
4 time, in fact, before time. But that \$77.11 has been  
5 rolling forward. So in order to get it out of my  
6 life, I will, Your Honor, pay that \$77.11 with my next  
7 bill. Thank you very much.

8 JUDGE COLWELL:

9 Okay, Ms. Greene. On behalf of the  
10 Commission, we are here to serve and we hope that you  
11 are satisfied with the service you have received here.  
12 Thank you for doing such a fine job of presenting your  
13 case. Now, let's give Mr. Franklin a chance to make a  
14 statement.

15 ATTORNEY FRANKLIN:

16 Thank you. Met-Ed has nothing further.  
17 Thank you, Ms. Greene and thank you, Your Honor.

18 JUDGE COLWELL:

19 All right. Then, if there's nothing  
20 else, ---.

21 MRS. GREENE:

22 Yes. I would like to thank the  
23 Commission very, very much. Everybody has been so  
24 helpful from Mr. McNulty on down. And I appreciate  
25 the Court and they've explained things to me as a

1 layperson that I don't understand. And I just want to  
2 thank you all very, very much. I think you've done a  
3 wonderful job.

4 JUDGE COLWELL:

5 Thank you, ma'am. I do have one more  
6 question. And I indicated earlier that you do have an  
7 opportunity to file a legal memo if you so choose.

8 MRS. GREENE:

9 Yes.

10 JUDGE COLWELL:

11 Do you wish to do that?

12 MRS. GREENE:

13 Yes, I do.

14 JUDGE COLWELL:

15 All right. Then we'll make it so that  
16 your legal memo or brief, you can call it, whichever  
17 you please, it will be accepted and will be due 30  
18 days after the receipt of the transcript. I will send  
19 out a notice when I receive the transcript so you know  
20 when that will be. Okay?

21 MRS. GREENE:

22 Okay. And will the Reporter get on and  
23 give me her name and address and how much it will cost  
24 me so I can get it to her?

25 JUDGE COLWELL:

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She will do that, yes.

MRS. GREENE:

Oh, I would really appreciate that.

JUDGE COLWELL:

Okay. Well, we'll go off the record and then she can talk to you.

MRS. GREENE:

Thank you so much.

JUDGE COLWELL:

Thank you. Bye, bye.

JUDGE COLWELL:

We're off the record.

\* \* \* \* \*

HEARING CONCLUDED AT 11:30 A.M.

\* \* \* \* \*

C E R T I F I C A T E

I HEREBY CERTIFY THAT THE FOREGOING  
PROCEEDINGS WERE REPORTED BY ME AND THEREAFTER  
REDUCED TO TYPEWRITING AND THAT THIS TRANSCRIPT IS A  
TRUE AND ACCURATE RECORD THEREOF.

SARGENT'S COURT REPORTING SERVICE, INC.

*Melissa Beam*

COURT REPORTER

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Before the  
Pennsylvania Public Utility Commission

9-27-04 HRG

Joan Greene

v.

Metropolitan Edison Company

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:

C-20029142

**DOCKETED**

OCT 15 2004

**DOCUMENT**

EXHIBIT NO. 1

CHART — MONEY TRAIL

SHOWING

MET-ED'S FALSIFICATION OF BALANCE DUE

SECRET

2004 OCT 13 PM 1:45

10/13/04

MET-ED'S FALSIFICATION OF JOAN GREENE'S ORIGINAL MONTHLY MET-ED BILLS FOR ELECTRICITY CONSUMPTION

Verbatim from Bills

Bill Dated	Period Covered	Previous Bill	Payments	Adjustments	Balance at Billing	Current Basic Charges	Total Due	Due Date
<u>Year-2001</u> 27 Nov	26 Oct - 27 Nov	238.09	0	10.00	248.09	139.10	387.19	20 Dec 01
24 Dec	28 Nov - 24 Dec	387.19	200.00	0	187.19	108.64	295.83	22 Jan 02
<u>Year-2002</u> 26 Jan	25 Dec - 25 Jan	295.83	0	0	295.83	473.91	769.74	20 Feb 02
25 Feb	26 Jan - 25 Feb	769.74	100.00	0	669.74	111.07	780.81	18 Mar 02
25 Mar	26 Feb - 25 Mar	780.81	295.83	0	484.98	94.67	579.65	15 Apr 02
23 Apr	26 Mar - 23 Apr	227.26	0	0	227.26	70.73	297.99	13 May 02
22 May	24 Apr - 22 May	297.99	0	0	297.99	65.09	363.08	11 Jun 02
22 Jun	23 May - 22 Jun	363.08	65.09	11.68	286.31	50.51	336.82	12 Jul 02
24 Jul	23 Jun - 24 Jul	336.82	50.51	0	286.31	58.19	344.50	13 Aug 02
24 Aug	25 Jul - 23 Aug	344.50	200.00 58.19	0	86.31 *	85.50	171.81	13 Sep 02
23 Sep	24 Aug - 23 Sep	171.81	85.50	0	86.31 *	38.36	124.67	15 Oct 02
22 Oct	24 Sep - 22 Oct	124.67	38.36	0	86.31 *	45.11	131.42	12 Nov 02
21 Nov	23 Oct - 21 Nov	131.42	45.11	0	86.31 *	51.84	138.15	11 Dec 02
26 Dec	22 Nov - 26 Dec	138.15	51.84	0	86.31 *	132.74	219.05	15 Jan 03

ELLIPSE = Met-Ed Scam

SQUARE = Met-Ed's dancing on THE BROWN MAHOGANY between the current bill and the previous bill with creative Off-the-Books accounting [1] which does not show up on the Consumer's bill for him to see and [2] which falsifies the Consumer's written records.

The data in each set of interconnected squares must be identical. It is the automatic carryover of "last months" balance to "this months" current bill and should never be tampered with, but Met-Ed does. As shown, the \$227.26 is not the previous month's balance which Met-Ed claims. That is a false statement. The \$227.26 is the \$279.86 previous bill which Met-Ed secretly and retroactively reduced by \$352.39 when they got caught with their hands in the cookie jar after I filed complaints about [1] high fraudulent "Actual" meter readings by Met-Ed for the three consecutive months of Jan-Feb-Mar 2002 and [2] the exorbitantly high kilowatt hours and dollars subsequently billed by Met-Ed. The "amount of reduction" figure of \$352.39 is hidden by Met-Ed and is not shown to the consumer anywhere on his bill, so Met-Ed does not have to admit to the overcharge—the purpose of this scheme. The only way the consumer knows his written records have been falsified by Met-Ed is by physically comparing the "Previous Bill" amount on each new months bill with the "Total Due" on last months bill. Met-Ed's data is not reliable. Met-Ed manipulates the data while transferring it from one bill to the other without informing the consumer—which I have dubbed "The Brown Mahogany Theory". Note how Met-Ed's \$352.39 "adjustment" is conspicuously absent from their "Adjustments" column for 23 Apr which shows nothing. That is the most flagrant of all Met-Ed falsifications, because it covers up their modus operandi. What Met-Ed did was cover up their 4,000-kilowatt-hour \$387.88 scam. In addition to my written complaints on the high fraudulent meter readings by Met-Ed on the Jan-Feb-Mar 2002 and 24 Sep 2003 bills, I also filed two complaints against fraudulent second charges by Met-Ed of the same kilowatt hours already paid—see chart on next page for the 25 Jan 03 and 24 Oct 03 bills. Copies of all complaints were sent to the Secretary of the Pennsylvania Public Utility Commission and are incorporated herein by reference.

MET-ED'S FALSIFICATION OF JOAN GREENE'S ORIGINAL MONTHLY MET-ED BILLS FOR ELECTRICITY CONSUMPTION

Verbatim from Bills

Bill Dated	Period Covered	Previous Bill	Payments	Adjustments	Balance at Billing	Current Basic Charges	Total Due	Due Date
26 Dec	22 Nov - 26 Dec	138.15	51.84 132.74	0	86.31	132.74	219.05	15 Jan 03
<u>YEAR--2003</u> 25 Jan	22 Nov - 24 Jan	138.15	184.58	0	46.43	279.92	233.49	14 Feb 03
24 Feb	25 Jan - 24 Feb	233.49	148.46	0	85.03	158.60	243.63	17 Mar 03
26 Mar	25 Feb - 26 Mar	243.63	158.60	0	85.03	111.34	196.37	15 Apr 03
24 Apr	27 Mar - 24 Apr	196.37	111.34	0	85.03	94.49	179.52	14 May 03
22 May	25 Apr - 22 May	179.52	94.49	0	85.03	67.49	152.52	11 Jun 03
25 Jun	23 May - 24 Jun	152.52	67.49	0	85.03	67.49	152.52	15 Jul 03
28 Jul	25 Jun - 25 Jul	152.52	67.49	0	85.03	47.25	132.28	18 Aug 03
25 Aug	26 Jul - 22 Aug	132.28	47.25	-8.08	76.95	39.23	116.18	15 Sep 03
24 Sep	23 Aug - 23 Sep	116.18	39.23	0	76.95	361.03	437.98	14 Oct 03
24 Oct	24 Sep - 23 Oct	70.28	0.00	0	70.28	47.25	117.53	13 Nov 03
24 Nov	24 Oct - 21 Nov	117.53	40.42	0	77.11	53.99	131.10	15 Dec 03

ELLIPSE = Met-Ed Scam

SQUARE = Met-Ed's dancing on THE BROWN MAHOGANY between the current bill and the previous bill with creative Off-the-Books accounting [1] which does not show up on the Consumer's bill for him to see and [2] which falsifies the Consumer's written records.

The data in each set of interconnected squares must be identical. It is the automatic carryover of "last months" balance to "this months" current bill and should never be tampered with, but Met-Ed does. The \$138.15 and \$70.28 are not the previous months' balances as Met-Ed claims. Those are false statements. Met-Ed changed the previous months' balances on The Brown Mahogany. Met-Ed's \$279.92 scam included a recharge of the 1,480 kWh and \$132.74 from my 26 Dec 02 bill for a second time onto my 26 Jan 03 bill. Met-Ed backed up to 22 Nov 02 and ran a 64-day billing period to 24 Jan 03, but I had already paid for both my Nov and Dec electricity consumptions. So, I untangled the Jan charges on the bill and paid the \$148.46 for Jan 03 which was all that I owed—not the fraudulent \$279.92. See my complaints to Mr. Burg dated 31 Jan 03 and 14 Feb 03. But I was still so disturbed that Met-Ed failed to carry the proper and correct data forward from my previous bill to the current bill without manipulating it, that I wrote Mr. Burg another complaint dated 24 Feb 03 about my BROWN MAHOGANY THEORY. It is the modus operandi by which Met-Ed covers up its scams when they get caught with their hands in the cookie jar. The Ellipse for \$117.53 is where Met-Ed charged me a second time for 80 kilowatt hours on my 24 Oct bill that I had already paid for in my \$50.55 check #2871 for Sep which cleared my bank on 14 Oct 03. Notice for 24 Oct 03 above that Met-Ed hid on The Brown Mahogany its coverup of their high false fraudulent meter reading of "999" for 24 Sep 03. That was tenfold my Aug 03 meter reading. On their 24 Sep 03 bill, Met-Ed skyrocketed my meter dials to read the fraudulent "999", ran the kilowatt-hour-usage up to an enormous 4,200, overcharged 3,680 kilowatt hours, and overcharged \$310.48. Of course, I had already filed a complaint with Mr. Burg about Met-Ed's tenfold scam of skyrocketing my meter dials to falsely read the "999", that complaint is dated 06 Oct 03. Also note the "Adjustment" column for 25 Jan 03 shows nothing. That is false—Met-Ed reduced the \$219.05 down to \$138.15 and hid their reduction of \$80.90. Note that "Adjustments" column for 24 Oct 03 shows nothing. That is false—Met-Ed reduced the \$437.98 down to \$70.28 and hid their reduction of \$367.70. The \$80.90 and \$367.70 "amount of reduction" figures are not shown anywhere on the bills for the consumer and forensic accountant to see and verify. That is the most flagrant falsification. It hides their M.O. Met-Ed falsified my records for each of the two months and covered up their falsifications by not recording their reductions in the "Detailed Adjustments" section of my bill. If it was not a scam, why does Met-Ed hide the refund after being caught?

Before the  
Pennsylvania Public Utility Commission

Joan Greene

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Metropolitan Edison Company

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PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

**EXHIBIT NO. 2**

**CHART — METER READING TRAIL**  
**SHOWING**  
**MET-ED'S FALSIFICATION OF METER READINGS**

**DOCUMENT**

**DOCKETED**

OCT 15 2004

**\* - FALSIFICATION BY MET-ED OF JOAN GREENE'S ORIGINAL MONTHLY BILLS FOR ELECTRICITY CONSUMPTION**

Met-Ed falsifies the "Last Months Reading" on the current bill to cover up their high false kWhs billed. Met-Ed hides their falsification on the Brown Mahogany between two original monthly bills where the Consumer and Forensic Accountant cannot see the data. Note diagonals which indicate where Met-Ed hid their amount of reductions in kWhs — after receipt of my complaints on high fraudulent meter readings: see "5520" and "4200" rectangles. The high false "3160" is a second charge for December's "655 - 692" meter reading of 1,480 kWhs already paid for. The "480" is a second charge for 80 kWhs from "905 - 907" already paid for. Met-Ed made the diagonal adjustments but failed to record them in their "Detail Adjustment" section on original monthly bills for Consumer and Forensic Accountant to see. Also, note how the amount of meter rise in ellipses is disproportional to the other months in that year. This fraudulent meter rise shows up vividly on the Usage Comparison chart as a Sore Thumb until Met-Ed wipes it off the chart to hide their scam—another falsification of my records.

Days In Billing Period	Period Covered	Last Months Reading	This Months Reading	Points by which Meter Rose	Multiply by 40 = kWh Billed	Total Met-Ed Charges in Dollars
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**YEAR 2001—Verbatim Original Monthly Bills**

29	Jan 25 - Feb 22	75	148	73	2920	255.87
30	Feb 23 - Mar 24	148	219	71	2840	246.31
30	Mar 25 - Apr 23	219	263	44	1760	152.12
31	Apr 24 - May 24	263	286	23	920	84.96
33	May 25 - Jun 26	286	297	11	440	43.01
29	Jun 27 - Jul 25	297	313	16	640	60.18
30	Jul 26 - Aug 24	313	333	20	800	72.76
31	Aug 25 - Sep 24	333	353	20	800	73.85
31	Sep 25 - Oct 25	353	378	25	1000	91.48
33	Oct 26 - Nov 27	378	417	39	1560	139.10
27	Nov 28 - Dec 24	417	447	30	1200	108.84
32	Dec 25 - Jan 25	447	585	138	5520	473.91

**YEAR 2002—Verbatim Original Monthly Bills**

31	Jan 26 - Feb 25	585	613	28	1120	111.07
28	Feb 26 - Mar 25	613	637	24	960	94.67
29	Mar 26 - Apr 23	537	556	19	760	70.73
29	Apr 24 - May 22	556	572	16	640	65.09
31	May 23 - Jun 22	572	585	13	520	50.51
32	Jun 23 - Jul 24	585	599	14	560	58.19
30	Jul 25 - Aug 23	599	622	23	920	85.50
31	Aug 24 - Sep 23	622	631	9	360	38.36
29	Sep 24 - Oct 22	631	642	11	440	45.11
30	Oct 23 - Nov 21	642	655	13	520	51.84
35	Nov 22 - Dec 26	655	692	37	1480	132.74
64	Nov 22 - Jan 24	655	734	79	3160	279.92

**YEAR 2003—Verbatim Original Monthly Bills**

31	Jan 25 - Feb 24	734	779	45	1800	158.60
30	Feb 25 - Mar 26	779	810	31	1240	111.34
29	Mar 27 - Apr 24	810	836	26	1040	94.49
28	Apr 25 - May 22	836	854	18	720	67.49
33	May 23 - Jun 24	854	872	18	720	67.49
31	Jun 25 - Jul 25	872	884	12	480	47.25
28	Jul 26 - Aug 22	884	894	10	400	39.23
32	Aug 23 - Sep 23	894	999	105	4200	361.03
30	Sep 24 - Oct 23	905	917	12	480	47.25
29	Oct 24 - Nov 21	917	931	14	560	53.99
32	Nov 22 - Dec 23	931	958	27	1080	97.86

Before the  
Pennsylvania Public Utility Commission

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EXHIBIT NO. 3

DOCKETED

OCT 15 2004

CHART — MONTHLY PAYMENTS

SHOWING

TIMELY ELECTRICITY CONSUMPTION PAYMENTS  
BY JOAN GREENE

DOCUMENT

**TIMELY PAYMENTS for MONTHLY ELECTRICITY CONSUMPTION**  
**by JOAN GREENE**  
**MAY 2002 through DECEMBER 2003**

Met-Ed Bill Dated	Check Number	Paid in Full	Payment Due Date	Cleared My Bank Account
22 May 02	2852	\$ 65.09	11 Jun 02	31 May 02
22 Jun 02	2860	50.51	12 Jul 02	05 Jul 02
24 Jul 02	2865	58.19	13 Aug 02	01 Aug 02
24 Aug 02	2871	85.50	13 Sep 02	03 Sep 02
23 Sep 02	2760	38.36	15 Oct 02	02 Oct 02
22 Oct 02	2771	45.11	12 Nov 02	01 Nov 02
21 Nov 02	2470	51.84	11 Dec 02	04 Dec 02
28 Dec 02	2804	132.74	15 Jan 03	14 Jan 03
25 Jan 03	2809	148.46 ***	14 Feb 03	08 Feb 03
24 Feb 03	2817	158.60	17 Mar 03	04 Mar 03
26 Mar 03	2826	111.34	15 Apr 03	09 Apr 03
24 Apr 03	2833	94.49	14 May 03	05 May 03
22 May 03	2842	67.49	11 Jun 03	02 Jun 03
25 Jun 03	2848	67.49	15 Jul 03	08 Jul 03
28 Jul 03	2857	47.25	18 Aug 03	05 Aug 03
25 Aug 03	2861	39.23	15 Sep 03	03 Sep 03
24 Sep 03	2871	50.55 ***	14 Oct 03	14 Oct 03
24 Oct 03	2879	40.42 ***	13 Nov 03	13 Nov 03
24 Nov 03	2884	53.99	15 Dec 03	02 Dec 03
26 Dec 03	2894	97.86	15 Jan 04	02 Jan 04

\*\*\* These figures are where Met-Ed tried to scam me again. But I refigured the correct amount due for electricity consumption and forwarded my payment in a timely manner to Mr. Peter Burg—along with my formal complaint about Met-Ed's overcharge. Mr. Burg is CEO of First Energy, the parent company of Met-Ed. Here are the corrections which I made and paid:

<u>Bill Dated</u>	<u>Fraudulent Met-Ed Charge</u>	<u>Corrected Charge by Joan Greene, Based on Actual Meter Reading on "Next Reading Date"</u>
25 Jan 03	\$ 279.92	\$148.46
24 Sep 03	361.03	50.55
24 Oct 03	47.25	40.42

I do not trust Met-Ed, so on the "Next Reading Date" I read my own electric meter. When Met-Ed's bill comes in with a high false meter reading which does not match my meter dials, I use my own reading to refigure the accurate amount of meter rise. I correct the number of kWhs used, recalculate the four charges plus surtax, and pay the proper amount for electricity consumption each month—on time as shown above. For now, that is the only way I know to stop being scammed.

However, that does not mean that Met-Ed acknowledges the overcharge or shows its reparation in the "Adjustment" section of next month's original monthly bill. Met-Ed never admits to the overcharge. Instead, after receipt of my complaint and being caught with their hands in the cookie jar, Met-Ed uses the Brown Mahogany Theory to retroactively hide its "lowered meter reading" and "lowered balance due" where the consumer and forensic accountant cannot see the data—as shown on my three Overview charts. Met-Ed covers up its scams in a methodical and habitual manner.

Met Ed falsifies my records retroactively and secretly and then hides its falsification between two original monthly bills. Met-Ed's "amount of reduction" in meter reading and dollars is never shown to the consumer or forensic accountant. There is no way to follow and verify Met-Ed's bookkeeping. Met-Ed's creative off-the-books accounting should be made illegal. The coverup is worse than the scam.

Pennsylvania Public Utility Commission

Joan Greene

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Metropolitan Edison Company

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PA PUBLIC UTILITY COMMISSION  
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**EXHIBIT NO. 4**

**STATUS LETTER TO**

**SECRETARY  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**08 DECEMER 2003**

**DOCKETED**

OCT 15 2004

**DOCUMENT**

08 December 2003

Secretary  
Pennsylvania Public Utility Commission  
Harrisburg PA 17105-3265  
P. O. Box 3265

Re: Second Appeal

Dear Secretary:

1. Please insert this copy of my formal complaint letter to Mr. Peter Burg, Chief Executive Officer of First Energy, into my second complaint file on:

Do I Have The Right To Read My Own Meter  
Each Month and Must Met-Ed Use My Actual  
Reading?

The 05 Nov complaint (Enclosure #1) concerns the 24 Oct 03 bill on which Met-Ed recharged 80 kilowatt hours for a second time. I have forwarded to you copies of my formal complaints about Met-Ed's scams in order to build up a file at PPUC which shows justification for: (1) my request to read my own meter, (2) Met-Ed's mandatory use of my actual meter reading to figure my electricity consumption bill each month, and (3) Met-Ed's compulsory provision of meter-reading dial cards in a timely manner.

2. For a running tally, I have drawn up the following chart to show that Met-Ed has now scammed me four separate times for a total of 9,240 kilowatt hours in the amount of \$837.55 in the time span of the last 22 months.

Met-Ed Overcharges		
Bills Dated	In Kilowatt Hours	In Dollars
Jan-Apr 2002	4,000	\$ 387.58
Jan 2003	1,480	132.74
Sep 2003	3,680	310.48
Oct 2003	<u>80</u>	<u>6.75</u>
	9,240	\$ 837.55

However, I am more infuriated by the falsification of my records by Met-Ed and its attorneys to cover up the scams. I have not been reticent about notifying the CEO of First Energy, Met-Ed and its attorneys of my outrage, copies of which you have. But the scams and fraudulent Rebills not only continue but worsen. Met-Ed's penultimate scam was tenfold their previous month's billing—see my complaint dated 06 Oct 03. For the modus operandi which Met-Ed uses to cover up their scams when caught with their hands in the cookie jar, see the enclosed 05 Nov 03 complaint as well as those dated 25 Apr 02 and 24 Feb 03.

3. I have proven in three separate complaints that Met-Ed:

- Scammed me.
- Then falsified my records with Rebills to cover up their scams.
- Then covered up their falsifications on the Brown Mahogany between the bills so the consumer and forensic accountant cannot see the data.

I have drawn up two charts (Enclosure #2) containing an overview of the pertinent data on Met-Ed's original monthly bills which show how and where Met-Ed hides the cover-up of their falsifications on The Brown Mahogany between the bills. The situation cannot get much worse. This is a request for the Public Utility Commission to stop Met-Ed and its attorneys from using their creative Off-the-Books accounting.

4. My first complaint to PPUC about Met-Ed's 4000-kWh scam from 25 Dec 01 to 23 Apr 02 and the falsification of records pertinent thereto is now before the Administrative Law Judge. His office called to set up a three-way conference call with Met-Ed's attorney, Jeffrey Franklin. I declined to participate in the call, because I had come to the belief that since Mr. Franklin was not furthering the resolution, he must be part of the problem. Mr. Franklin called numerous times for extensions which I granted him although there was no progress and I was receiving no viable settlement offer. When Mr. Franklin finally responded, it was up-in-my-face and insulting. Mr. Franklin based his response to my complaint upon Met-Ed's odious Rebills. The most important thing I asked for in my complaint was that the Rebills not be used as a basis for response. But Mr. Franklin used them anyway. My grants of extensions were a waste of time. During the squandering, I have been scammed three more times by Met-Ed. I do not plan to talk with Mr. Franklin again or anyone at his law firm of Ryan, Russell, Ogden & Seltzer.

After the ALJ served papers on Met-Ed, I was first contacted by Carl Engleman at the firm. He called and asked for a 14-day extension, but I gave him 30 days if he would get an honest accounting of my bill. I told him he could have the extension "if you don't let Met-Ed hornswoggle you into using their Rebills." In my letter to Mr. Burg dated 31 Jan 03, I said Mr. Engleman could have as much time as he needed as long as he ignored the fraudulent "Rebills" and used my original monthly bills:

I received a call from Carl Engleman of Ryan, Russell, Ogden & Seltzer who informed me that he is representing Met-Ed in my first complaint which he was served by the PUC. I granted his request for a 14-day extension to reply to the PUC. In fact, I gave him 30 days. I told him that if anyone is willing to look at Met-Ed's original bills [not "rebills"] and get me the number of kWh and cost for the electricity which my meter says I used between 25 Dec 2001 and 23 Apr 2002, I was happy to give him extra time, all he needs. As long as he ignores the fraudulent "rebills" and uses the original bills.

I sent a computer copy of Mr. Burg's letter to Mr. Engleman at Ryan, Russell, Ogden and Seltzer, so the law firm had my request in writing as well as verbal. Then his supervisor, Jeffrey Franklin, took over and called me for the many unproductive extensions. Mr. Franklin knew or should have known that I considered the Rebills to be fraudulent cover-ups for Met-Ed's scams, because I discussed them in minutiae in the body of my submission to the PPUC. He also knew that my preface to the section "What Would You Like the Business to Do to Settle your Complaint" unmistakably proscribed his use of the Rebills. The preface stated:

In one inclusive written letter--no verbal calls--I want Met-Ed to do the following. In order to be acceptable, Met-Ed must use my original bills and not their "rebills".

The section then went on to list the 10 items I would like for Met-Ed to address. In his settlement offer of 15 May 03, Mr. Franklin responded to most of the items and admitted my assertions that Met-Ed's bills charged me 8360 kWhs for the subject period, that according to Met-Ed's bills my meter verified that I used only 4360 kilowatt hours, and that there was an overcharge of 4000 kWhs according to the original monthly bills. I appreciated his candor in predicating his admissions on my original monthly bills as I had requested. All fine and good, but then he did an about-face, walked away from the original monthly bills, and used the fraudulent rebills to figure the accounting summary, which he put into chart forms. Mr. Franklin failed to use only my original monthly bills as required.

Mr. Franklin called to discuss his offer and I rejected it in no uncertain terms. I told him his Account Summary chart was not based on the data on my original bills which is what I requested in my complaint to the PPUC, that his Summary Chart was based on the Rebills. He said "No, the account summary chart states it was based on "Special" bills. I told him "A rose is a rose is a rose. It is still the same data on the fraudulent Rebills no matter what you want to call it." But I later discovered that I was wrong—he used his own falsified information which was inconsistent with all the other data I had gotten from Met-Ed.

Mr. Franklin's information was not based on an "Actual" or "Estimated" meter reading but on "Special" meter readings for each of the three months. I now had at least four differing sets of data for each of the three consecutive months of Jan-Feb-Mar 2002 in which Met-Ed had misread my meter too high each month in "Actual meter readings", against which I filed the complaint which is now before the ALJ. On the next page I have charted them, showing (1) the "Actual" meter reading information shown on my original monthly bill for electricity consumption, (2) Ms. Terrie Christman's Rebills for each month post dated 09 Apr 02, and (3) Mr. Franklin's first account summary dated 15 May 03 containing his "Special" meter readings—none of the three sets of data matches, so how am I supposed to understand my accounting:

THREE DIFFERENT SETS OF DATA JOAN GREENE RECEIVED  
FOR JAN AND FEB AND MAR OF 2002

	Met-Ed Bill Date	Number of Days in Billing Period	Meter Reading	Method of Meter Reading	Kilowatt Hours Used	Total Met-Ed Energy Charges	Late Payment Charges
<b>25 JANUARY 2002</b>							
Original Monthly Bill	01/28/02	32	585	Actual	5520	\$ 473.91	\$ 4.40
Terrle Christman's 08 Apr 02 Rebill	01/25/02	32	477	Rebill	1200	111.78	4.40
Jeffrey Franklin's 1 <sup>ST</sup> Summary Chart dated 15 May 03	01/25/02	32	485	Special	1520	139.34	4.40
<b>25 FEBRUARY 2002</b>							
Original Monthly Bill	02/25/02	31	613	Actual	1120	\$ 111.07	\$10.05
Terrle Christman's 08 Apr 02 Rebill	02/25/02	31	507	Rebill	1200	107.75	1.23
Jeffrey Franklin's 1 <sup>ST</sup> Summary Chart dated 15 May 03	02/25/02	31	513	Special	1120	111.07	10.05
<b>25 MARCH 2002</b>							
Original Monthly Bill	03/25/02	28	637	Actual	960	\$ 94.67	\$ 7.12
Terrle Christman's 08 Apr 02 Rebill	03/25/02	28	537	Rebill	1200	107.75	1.23
Jeffrey Franklin's 1 <sup>ST</sup> Summary Chart dated 15 May 03	03/25/02	28	537	Special	960	94.67	7.12

**NOTE:**

1. Mr. Franklin on his "Special" January bill drops 4,000 kWhs Used from my original monthly bill. From "5520" down to "1520". In one whack, Mr. Franklin falsifies my original January monthly bill and covers up the exact amount of Met-Ed's 4000-kWh-scam. He lowers the "Total Met-Ed Energy Charges" from the fraudulent \$473.91 on 25 Jan 02 down to only \$139.34. He also lowers the meter reading by 100 from the fraudulent high false scam of "585 Actual Meter Reading" shown on my original January bill down to his "485". So there was no need for him to falsify the February and March bills. The scam had already been papered over. But he lowered by 100 the meter reading in February from "613" to "513". He lowered by 100 the meter reading in March from "637" to "537". For the 3 months, he lowered the meter readings by 300 points. My multiplier is 40, so that would be 12,000 fewer kilowatt hours used and \$1,012.50 fewer dollars in Energy Charges. I don't think so. He fudged up the numbers until they are sorely unrealistic. They don't compute. I am in the process of preparing a detailed scenario of his three "Special" meter readings for submission to the ALJ.

2. Ms. Christman falsifies all three original monthly bills by equally spreading out the usage to 1200 kWh used per month for some strange reason—against which I filed a complaint with Met-Ed and Mr. Burg on falsification of my records. She now shows the method of meter readings was not "Actual" for January, February and March 2002 which is false, because Met-Ed's original monthly bills said all three months were "Actual" meter readings as shown above. For each month, Ms. Christman retroactively lowers the "Meter Reading" but does not lower February and March's "Kilowatt Hours Used" or "Energy Charges", which should go down correspondingly with her lowered meter reading each month. She lowers January's meter reading by 108 points—February's by 106 points—and March's by 100 points. In total, she lowers the meter readings by 314 points. My multiplier is 40, so that would be 12,560 fewer kilowatt hours for the three months as compared to Mr. Franklin's reduction of 12,000. Ms. Christman's 314-point drop in meter readings would be \$1,059.74 fewer dollars in Energy Charges. Not possible. Ms. Christman's figures do not compute which I also will address to the ALJ in further detail.

3. Mr. Franklin's and Ms. Christman's account summaries contradict each other, and both contradict my original monthly bills for Jan-Feb-Mar 2002 as shown above. My 23 Apr 02 Original Monthly bill was already falsified by Met-Ed upon issuance—with March's fraudulent "637" meter reading retroactively and secretly lowered to April's meter reading of "537" without drawing it to my attention or telling me on the 23 April bill how many fewer kilowatt hours and dollars that would be. And, of course, no mention of a refund. See my 25 Apr 02 complaint.

Additionally, I received two other versions of data from Brian Lowe and Rosalyn at Met-Ed. Overall, I received at least four sets of falsified data from Met-Ed, when all I wanted was one honest Account Summary based on the original monthly bills I receive each month from Met-Ed for electricity consumption. Not Mr. Franklin's "Special" bills and not Ms. Christman's "Rebills". Met-Ed and its attorneys failed to fulfill my request.

After I flat-out rejected his offer containing the above falsified "Special" bill data, Mr. Franklin said he was sending another paper. I told him in the telecon not to bother, I didn't want it. That I was going to address my concerns with his offer containing the "Special" meter readings directly to the ALJ. He said I could not do that because it was confidential. Contrary to my wishes, he sent his unsolicited and unwanted second revised account summary chart anyway—and had the audacity to say that I requested it: "As you requested, this account statement shows the original billing information in addition to the three rebills made in April 2002 due to incorrect meter readings in January, February, and March of 2002." I not only did not request it, I specifically told Mr. Franklin I did not want any more of his papers. Anyone who has read my complaints knows with what vehemence I hate Met-Ed's Rebills. I did not and would never want the stupid falsified Rebill data and absolutely positively did not request it. To the contrary, I have fought to get an accounting not using the fraudulent Rebills. If Pennsylvania law does not allow me to read my own meter and does not demand that Met-Ed process my actual meter reading to figure the monthly electricity consumption on my bill—so I can get away from Met-Ed's scams, fraudulent rebills, and falsifications of my account—I plan to continue to the Federal Trade Commission. I at no time agreed to confidentiality.

What Mr. Franklin did in his second revised chart dated 11 Aug 03 was [ 1 ] remove the word "Special" from the "Type" of meter reading and [ 2 ] use the fraudulent data from Ms. Christman's Rebills post dated 09 Apr 02 for each prior billing period in January, February and March 2002, against which I had filed the complaint with Met-Ed and Mr. Burg. Here is the pertinent excerpt from his chart showing his use of Rebills to respond to my PPUC complaint:

SERVICE TO	DAYS	RDG	TYPE	KWHS	BILL AMT.	LATE CHARGE
11/27/01	33	417	A	1560	\$139.10	\$ 3.52
12/24/01	27	447	A	1200	108.84	2.81
01/25/02	32	585	A	5520	473.91	4.40
02/25/02	31	613	A	1120	111.07	10.05
03/25/02	28	637	A	960	94.67	7.12
REBILL DUE TO OVERREAD						
01/25/02	32	477	E	1200	\$111.78	\$ 4.40
02/25/02	31	507	E	1200	107.75	*
03/25/02	28	537	E	1200	107.75	*
04/23/02	29	556	A	760	70.73	

\* Mr. Franklin does not show the \$1.23 late charge which was on Ms. Christman's Rebills as shown in the prior chart.

In his 2<sup>nd</sup> account summary chart, Mr. Franklin first changes his "Special" meter readings to "Estimated" readings which the original monthly bills stated were "Actual" meter readings (as shown in his chart). He falsifies my records. But it proves my stated position that they must first designate a bill as an "Estimate" which then gives them license to manipulate the data. Mr. Franklin interrupts the flow of my accounting to interweave data from Ms. Christman's fraudulent 09 Apr 02 Rebills into the middle of the data from my original monthly bills. He already listed data for Jan-Feb-Mar 02 once. Why put in a second set of Jan-Feb-Mar 02 data that is completely different? From this point on, the accounting utterly confuses me. The chart is useless, but they cannot get away from using the fraudulent Rebills. For Met-Ed and its attorneys to remove all the Rebill data from their account summaries would be to rip off the cover from Met-Ed's scams and expose them and Met-Ed's off-the-books creative accounting as I have shown in my two charts at Enclosure #2.

Respectfully yours,

Joan Greene  
 845 Locust Street  
 Mt. Wolf PA 17347-9509

- Enc. 1: My 05 Nov 03 Complaint Letter to Mr. Burg on Met-Ed Falsifications
- Enc. 2: Two Overview Charts on How and Where Met-Ed Hides Falsifications

cc: Mr. Peter Burg, Chief Executive Officer, First Energy

Pennsylvania Public Utility Commission

Joan Greene

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Metropolitan Edison Company

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**EXHIBIT NO. 5**

**FORMAL COMPLAINT LETTER TO**

**MR. PETER BURG  
CHIEF EXECUTIVE OFFICER  
FIRST ENERGY**

**05 NOVEMBER 2003**

**DOCUMENT**

**DOCKETED**

OCT 15 2004

05 November 2003

Mr. Peter Burg  
CEO, First Energy  
P.O. Box 3687  
Akron OH 44309-3687

Re: Formal Complaint: (1) Falsification of My Records and  
(2) Overcharge on Met-Ed Bill dated 24 October 2003  
covering period 24 Sep to 23 Oct 2003

Dear Mr. Burg:

1. On their 24 Oct 03 bill, Met-Ed charged for meter readings "905 to 917" at 480 kilowatt hours used. Met-Ed charged me a second time for the meter rise of "905 to 907" which is  $2 \times 40 = 80$  kilowatt hours and \$6.76 in overcharges. I already paid for those same 80 kilowatt hours last month when I paid \$50.55 for meter readings "894 to 907" (see my complaint letter dated 08 Oct 03). So I refigured the subject Met-Ed bill for 24 Oct to remove the 80-kilowatt-hour overcharge. Enclosed is my check #2879 in the amount of \$40.42 to cover the 400 kilowatt hours I used from meter readings "907 to 917" covering period 25 sep to 23 Oct 03.

2. I am outraged by Met-Ed continuing to falsify my records. In my letter on the very first 4000-hour overcharge in 2002, I wrote Met-Ed that falsifying my records was not acceptable. Falsifying my records is absolutely unallowable. I will follow the trail of the huge "999" fraudulent meter reading by Met-Ed last month which was tenfold the August reading and which was the subject of the 08 Oct 03 complaint. Met-Ed's "999" meter reading for September should have been carried over unmanipulated to Met-Ed's October bill. It was not. The "999" does not appear anywhere on Met-Ed's October bill. It was deep-sixed.

METER READING INFORMATION SECTION			
SEPTEMBER Bill dated 24 Sep 03 Billing Period Covering 23 Aug to 23 Sep 2003 Estimated		OCTOBER Bill dated 24 Oct 03 Billing Period Covering 24 Sep to 23 Oct 2003 Rebill	
Present kWh Reading (Estimate)	999	Present kWh Reading (Actual)	917
Previous kWh Reading (Actual)	894	Previous kWh Reading (Estimate)	905
Difference	105	Difference	12
Multiplier	40	Multiplier	40
Kilowatt Hours Used	4,200	Kilowatt Hours Used	480

The "Present kWh Reading" figure of "999" on the September bill should have been inserted on the October bill as the "Previous kWh Reading". Those two numbers must be the same. But they are not. The October chart shows that Met-Ed failed to transfer the "999" and that Met-Ed manipulated the "999" and reduced it to only "905". Met-Ed is attempting to infer that they charged 905 kilowatt hours of usage for September which is not true. They charged me the fraudulent "999". This is falsification of my records to cover up the evidence I put forth in my complaint. In one fell swoop on their 24 Oct 03 bill, Met-Ed eliminated evidence which proved:

Met-Ed skyrocketed my meter dials to read a fraudulent "999" for the 24 Sep 03 bill.  
Met-Ed ran the kilowatt hour usage up to an enormous 4,200 for the 24 Sep 03 bill.  
Met-Ed overcharged 3,680 kilowatt hours for the 24 Sep 03 bill.  
Met-Ed overcharged \$310.48 for the 24 Sep 03 bill.

The "999" got thoroughly eradicated from my Oct 03 original bill. By the term "original", I mean the document I receive each month as my regular bill for electricity consumption and does not include a rebill which, as you know, I believe Met-Ed uses to cover up their scams. Please note that the October bill is a REBILL preceded by an ESTIMATED bill, which corroborates my stated position.

3. By falsely dropping the "999" to "905", Met-Ed also wiped out the 4,200-kWh SORE THUMB for September on the "Usage Comparison" chart which is a favorite ploy about which I have filed complaints with you before. This SORE THUMB should never disappear (1) because it is part of the written record, (2) because it is an instantaneous and highly visible signal to a forensic accountant, and (3) because Met-Ed should not be allowed to go back to a previous month's bill to falsify and change the data for that month. Whatever happened, happened. And should not be whitewashed. On the bottom left is the September "Usage Comparison" chart with the SORE THUMB. On the right is the October "Usage Comparison" chart with the September SORE THUMB eradicated.

If Met-Ed had run the October "Usage Comparison" chart using the same 6000 maximum parameter as they did for the September chart, a consumer might have been able to compare the two. Met-Ed runs the left-hand parameter column up and down. One month's maximum is 6000. The next month's maximum is 2000, which drastically distorts the proportions of the chart and makes it almost impossible for a consumer to compare the two. The heading of the section is an oxymoron.

4. Again Met-Ed used the Brown Mahogany Theory--they manipulated the data on the brown mahogany between the Sep and Oct bills while transferring the data from the previous month of Sep 03 to the current month of Oct 03, so the data would not show up on the bill for the consumer and auditor to see. My left chart shows verbatim Met-Ed's data as recorded on their original 24 Sep 03 bill. The right chart shows verbatim data as recorded on their original 24 Oct 03 bill. As follows:

ACCOUNT SUMMARY SECTION			
SEPTEMBER Bill dated 24 Sep 03 Billing Period Covering 23 Aug to 23 Sep 2003		OCTOBER Bill dated 24 Oct 03 Billing Period Covering 24 Sep to 23 Oct 2003	
	Amount Due		Amount Due
Your previous bill was	116.18	Your previous bill was	70.28
Total payments/adjustments	- 39.23	Total payments/adjustments	0.00
Balance at billing on September 24, 2003	76.95	Balance at billing on October 24, 2003	70.28
Current Basic Charges		Current Basic Charges	
Met-Ed - Consumption	381.03	Met-Ed - Consumption	47.26
Total Due by Oct 14, 2003 -Please pay this amount	\$ 437.98	Total Due by Nov 13, 2003 -Please pay this amount	\$ 117.63

On the Oct 03 bill, Met-Ed continues to erase evidence of the overcharge by manipulating the data from the Sep 03 bill. On the Sep bill, Met-Ed showed that my "Total Due" was \$437.98 which included the \$310.48 overcharge. But Met-Ed fails to carry over that amount to the Oct bill which is the normal procedure. Met-Ed's Oct bill correctly should have stated "Your previous bill was \$437.98". But it did not. Met-Ed changed the data while transferring it and states "Your previous bill was \$70.28." That is not a true statement and is a falsification of my records.

On the 24 Oct bill, Met-Ed gives no explanation for this manipulation. In other words, Met-Ed does not admit to the September overcharge and does not acknowledge on the Oct 03 bill how much they overcharged in dollars and kilowatt hours for Sep 03. I needed detailed information on Met-Ed's adjustment from \$437.98 down to \$70.28 from one bill to the other. So I went to the logical section on the 24 Oct 03 bill usually entitled "Detail Payment and Adjustment Information" in order to find the details on the adjustment Met-Ed made. There was nothing. Met-Ed wiped out the whole section and its heading from off my October bill. Zick. Zero. Nothing. The "detailed information" section should have been packed with information on acknowledgement of Met-Ed's September overcharge of 3,680 kilowatt hours and \$310.48. The section should then have set forth Met-Ed's actions taken to rectify the overcharges. I will never know how Met-Ed came up with the difference of \$367.70 while dancing on the brown mahogany. The figure of "\$367.70" is not shown anywhere on the Oct 03 bill. I do not understand why the refund has to be such a secret if it is not a coverup.

5. Since there was no "Detail Payment and Adjustment Information" section on the Oct 03 bill, Met-Ed also failed to record my \$60.65 electricity consumption payment for Sep 03 which I mailed to you with my formal written complaint dated 06 Oct 03 about the fraudulent 24 Sep 03 bill. This is falsification of my payment record. I had read my meter and figured out my own bill and paid--because Met-Ed was attempting to scam me tenfold. My \$60.65 check #2871 cleared my bank on 14 Oct 03.

6. In addition to the sin of omission on the "Detail Payment and Adjustment Information" section, Met-Ed committed the sin of commission. Met-Ed expressly falsified my payment on the "Account Summary" section of the bill dated 24 Oct 03 as shown in paragraph 4 above. Met-Ed stated:

"Total payments/adjustment 0.00"

Met-Ed's statement is not true. This is an explicit falsification of my payment record. My check for \$60.65 cleared my bank on 14 Oct 03 and Met-Ed's bill containing the false statement is dated 10 days later on 24 Oct 03, so the falsification appears to be intentional.

7. I see no reason for all the chicanery, so I went to the "Message" section to see if Met-Ed left a message about my complaint. The "Message" section would be a useful place for Met-Ed to talk to the consumer and fully explain their overcharges and resultant corrections in dollars and kilowatt hours, as well as the amount of the refund or credit. There was nothing but a reminder of the unpaid amount which is pending from the first overcharge of 4,000 hours in Jan-Apr 2002 which has not been resolved. There is seldom useful information in this section which has the potential to be a powerful consumer-friendly section. For example, the Oct message should have said:

MESSAGE

On the 24 Sep 03 bill, your meter was misstated at "999". The bill should have shown your meter reading at "907" on 24 Sep 03. You were erroneously overcharged 3,680 kilowatt hours which was an overcharge of \$310.48. The \$310.48 is hereby credited to your account on this 24 Oct 03 bill. See the "Detailed Payment and Adjustment Information" section for details.

The Met-Ed overcharges, and consequent refunds/credits and corrections that are necessary to make the consumer whole, should be stated distinctly and categorically on the next month's original monthly bill, so the consumer can follow and verify what Met-Ed has done to the data on his previous bill:

- If and when Met-Ed makes an adjustment, it should be mandatory that Met-Ed identify that adjustment in the "Detail Payment and Adjustment Information" section. It should be specified whether the dollar amount is a Met-Ed "Adjustment" or a customer's "Payment". The amount should not be vaguely thrown into the section and left undesignated. Or better yet, separate the two items and make two different sections on the bill—one for "Detail Adjustments" and another for "Detail Payments".
- Met-Ed's underlying rationale for each requirement for an adjustment should be documented on the bill to the customer in the section entitled "Message".

The refund/credit for an overcharge and the reason therefor must show up on the consumer's original monthly bill for him to see. At the current time they do not, because Met-Ed would first have to admit the overcharge which it never does. Instead, Met-Ed uses the Brown-Mahogany Theory to cover up the refund, as I have documented in this complaint and my previous complaint letters dated 26 April 2002 and 24 February 2003. The adjustment must not be recorded on the Brown Mahogany between the bills where it never shows up on the bill for the consumer to see. Creative off-the-books accounting should be made illegal.

8. In summary, Met-Ed's October 2003 "Meter Reading Information" section correctly should have shown:

OCTOBER Bill dated 24 Oct 03 Billing Period Covering 26 Sep to 23 Oct 2003	
Residential Meter Number G46026384	
Present kWh Reading (Met-Ed Actual) and Customer Agrees	917
Previous kWh Reading (Customer's Actual Reading on 24 Sep 03)	907
Difference	10
Multiplier	40
kilowatt Hours Used	400

9. Then, the "Charges" section correctly should have shown the 400 kWh—not 480:

Charges from Met-Ed this billing period			
Customer Charge			\$ 6.67
Generation Charge	400 kWh	x 0.046060	18.424
Transmission Charge	400 kWh	x 0.001720	0.688
Distribution Charge	400 kWh	x 0.030290	12.116
Transition Charge	400 kWh	x 0.006140	<u>2.056</u>
<b>TOTAL</b>			<b>33.28</b>
State Tax Surcharge @ .014 %			<u>0.47</u>
<b>Total Met-Ed Charges</b>			<b>\$ 40.42</b>

Therefore, I enclose check #2879 in the amount of \$40.42.

Respectfully yours,

Joan Greene  
846 Locust Street  
Mt. Wolf PA 17347-9609

Enclosure: Check #2879 in the amount of \$40.42 to cover the 400 kWh of Electricity Consumption for Period 26 Sep 03 to 23 Oct 03 shown on Meter Readings "807 to 817"

cc: Secretary  
Pennsylvania Public Utility Commission  
P. O. Box 3265  
Harrisburg PA 17105-3266

Before the  
Pannsylvania Public Utility Commission

Joan Greene  
v.  
Metropolitan Edison Company

C - 20029142

C-  
Ex. 6  
(Petition to the Court)

TO:

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9-27-04 HRG

The Honorable Michael C. Schnierle  
Administrative Law Judge  
P. O. Box 3265  
Harrisburg PA 17105-3265

OCT 13 2004

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PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

OCT 15 2004

Your Honor:

1. I cannot afford an attorney, so please enter as evidence the following five self-explanatory enclosures showing Met-Ed's scams and, more importantly, the coverup of their scams and their Modus Operandi when caught with their hands in the cookie jar. I have drawn up several Overview Charts which condense the information on my original monthly bills down to one page in an attempt to make the coverups more comprehensible at a glance. I am not an accountant, and it took me a while to figure out their M.O. It just did not occur to me to compare the "balance due" or "meter reading" on the previous bill to the current bill to make sure it was carried forward from one bill to the other without manipulation by Met-Ed. That is where Met-Ed secretly and retroactively falsifies my records to hide its refunds of (a) money and (b) kilowatt hours so it does not have to admit to the overcharge. Met-Ed hides its falsification on The Brown Mahogany. There is a separate chart for each. One follows the money trail. The other follows the meter reading trail. Further, Met-Ed fails to record its "adjustment" in the "Detail Payment and Adjustment" section of their bill for the consumer and forensic accountant to see and authenticate. I would like a remedy for that as stated in my letter to Mr. Burg, the Chief Executive Officer of First Energy, dated 05 Nov 03, QUOTE:

The Met-Ed overcharges, and consequent refunds/credits and corrections that are necessary to make the consumer whole, should be stated distinctly and categorically on the next month's original monthly bill, so the consumer can follow and verify what Met-Ed has done to the data on his previous bill:

- If and when Met-Ed makes an adjustment, it should be mandatory that Met-Ed identify that adjustment in the "Detail Payment and Adjustment Information" section. It should be specified whether the dollar amount is a Met-Ed "Adjustment" or a customer's "Payment". The amount should not be vaguely thrown into the section and left undesignated. Or better yet, separate the two items and make two different sections on the bill—one for "Detail Adjustments" and another for "Detail Payments".
- Met-Ed's underlying rationale for each requirement for an adjustment should be documented on the bill to the customer in the section entitled "Message".

DOCUMENT

The refund/credit for an overcharge and the reason therefor must show up on the consumer's original monthly bill for him to see. At the current time they do not, because Met-Ed would first have to admit the overcharge which it never does. Instead, Met-Ed uses the Brown-Mahogany Theory to cover up the refund, as I have documented in this complaint and my previous complaint letters dated 25 April 2002 and 24 February 2003. The adjustment must not be recorded on the Brown Mahogany between the bills where it never shows up on the bill for the consumer to see. Creative off-the-books accounting should be made illegal. END QUOTE

2. To explain why my complaints against Met-Ed are directed to Mr. Burg: as you know, First Energy is the parent company of Met-Ed. When Met-Ed would not answer my complaint about their overcharges for the three consecutive months of Jan-Feb-Mar-2002, I called Met-Ed's headquarters in NJ and asked for the President's name to contact. I was given Mr. Burg's name instead, and I have forwarded to him all my complaints—with a copy of each to the Secretary of the PPUC. Also, along with the corresponding complaint, I mailed to Mr. Burg those payments which I was compelled to refigure because Met-Ed overcharged again. Those refigured amounts are identified on the Monthly Payments chart.

3. As shown on my chart, I have made timely payments for electricity consumption from the time that Met-Ed finally lowered on the 23 Apr 02 bill its high false meter readings to match the dials on my meter—but only after my call of 26 Mar 02 in which I read my dials to Met-Ed—and Met-Ed said they read "537" but that they had just billed me the day before at a meter reading of "637". That was a 4000 kWh overcharge for the three consecutive months. Now I need an honest summary of my account not based on Met-Ed's rebills, because Met-Ed's attorney has admitted in writing that there was a 4,000 kWh overcharge according to my original monthly bills. Mr. Jeffrey Franklin sent me two account summaries, but neither one of them was based solely on my original monthly bills as I requested in my formal submission to the PPUC. I could not understand the accounting after he threw in Met-Ed's rebills changing the data. Therefore, I rejected them, as summarized in my enclosed 08 December 2003 status letter to the Secretary of PPUC.

4. Met-Ed has several scams. Met-Ed:

Runs the meter dials up to a high false fraudulent meter reading. When they get caught by a consumer who files a written complaint, Met-Ed secretly and retroactively lowers (a) the "meter reading" and (b) the "balance due" without telling the consumer. See separate overview chart detailing each.

Recharges for kilowatt hours already paid for. Same charts.

The scams are bad enough. However, I am more outraged by Met-Ed's coverup of their scams. As an example of Met-Ed's typical coverup, I am enclosing my 05 Nov 03 complaint to Mr. Burg which shows with specificity where and how Met-Ed hid its high false "999" meter reading and fraudulent \$310.48 overcharge for 24 Sep 03. I pulled pertinent data from the previous bill and current bill and placed them in tables side-by-side so they could be easily compared without flipping back and forth between the bills. It should be made illegal for Met-Ed to change the previous meter reading or previous bill amount or, especially, the previous manner of meter reading. Either Met-Ed took an actual reading or they did not.

5. For your hearing on 12 Feb 04, I am enclosing this paper and a set of enclosures for each of the following in compliance with your letter of 29 Dec 03, except I have provided two sets for the Reporter:

If you intend to file exhibits, 2 copies of all hearing exhibits to be presented into evidence must be submitted to the reporter. An additional copy must be furnished to the Presiding Officer. A copy must also be provided to each party of record.

Individuals representing themselves do not need to be represented by an attorney.

I am unable to attend the hearing and request that you decide the case based on all the written evidence I have provided to you and the Secretary of the PPUC, including my original complaint.

Respectfully yours:                      Complainant Joan Greene  
845 Locust Street  
Mount Wolf PA 17347-9509

Signed Joan Greene and Dated this 6<sup>th</sup> day of February, 2004.

cc: Mr. Peter Burg, CEO, First Energy, with Enclosures

**Before the  
Pennsylvania Public Utility Commission**

**Joan Greene**

**v.**

**Metropolitan Edison Company**

:  
:  
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:  
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**C-20029142**

**EXHIBITS**

1. **Money Trail. Chart showing Met-Ed's falsifications of my balance due---two pages**
2. **Meter Reading Trail. Chart showing Met-Ed's falsifications of my meter readings**
3. **Monthly Payments Chart**
4. **Status Letter to Secretary of Pennsylvania Public Utility Commission - 08 Dec 03**
5. **Complaint Letter to Chief Executive Officer Peter Burg - 05 Nov 03**



B. Lowe

9-27-04 HRG  
August 6, 2002

C-20029142

Joan Greene  
845 Locust Street  
Mt. Wolf PA 17347-9509

Subject: Adjusted Electric Bill  
Account # 10 00 20125652

Dear Ms. Greene:

Since our July 29, 2002 telephone conversation I have been unable to contact you by telephone to discuss the results of our investigation related to your July 15, 2002 letter to Pete Burg.

So that I can answer your questions and discuss the adjustment, at your convenience could you call me at (610) 939-8696? If I am not available at the time of your call, please leave me a message with the best time to contact you by telephone.

Thank you.

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OCT 13 2004

PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

Sincerely,

Brian E. Lowe  
Director  
Customer Services  
(610) 939-8696

c: Pete Burg  
Earl Carey  
Jack Kline

DOCUMENT

DOCKETED

OCT 15 2004

## RECEIVED

August 9, 2002

OCT 13 2004

Joan Greene  
845 Locust Street PA PUBLIC UTILITY COMMISSION  
Mt. Wolf PA 17347-9509 SECRETARY'S BUREAU

C-20029142

Subject: Adjusted Electric Bill  
Account # 10 00 20125652

### DOCKETED

OCT 15 2004

Dear Ms. Greene:

As we previously discussed, your July 15, 2002 letter to Mr. Pete Burg was forwarded to my attention for review and follow-up. Thank you for taking the time to write to express your views

I tried to follow-up to our July 29, 2002 telephone conversation, but have been unable to contact you by phone. However, we have completed the review of your account and have an explanation that we hope will satisfy your inquiry. But first, in response to the questions you asked:

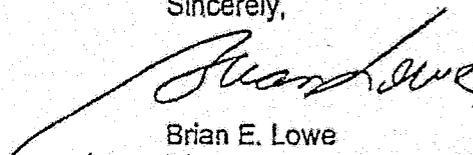
- The cost for 4300 kWh, if billed in one month, is approximately \$394.00.
- The payments we received between December 2001 and March 2002 total \$395.83. (\$100.00 posted to your account February 7 and \$295.83 posted February 27, 2002).

In response to the concerns raised in your letters, the adjustments were the result of high estimates. For example, while we received an actual meter reading December 24, 2001, your usage for January 25, February 25, and March 25, 2002 was estimated. An actual meter reading obtained March 29, 2002 indicated the estimates were too high. As a result we adjusted your account and spread the usage equally over the three-month period (1200 kWh each month). The billing for the service over this three-month period was \$322.86. Please note the enclosed chart.

Also, when we make adjustments to an account, we are obligated to send revised billings to keep our customers informed. However, I agree we could have done a better job of providing our explanation. We also removed all late charges from your account, which were assessed during this period, which leaves an account balance of \$23.93 as of this writing.

Again Ms. Greene, please accept my personal apology for any confusion our billings may have caused. If I may be of future assistance, please feel free to contact me.

Sincerely,



Brian E. Lowe  
Director  
Customer Services  
(610) 939-8696

## DOCUMENT

c: Pete Burg  
Earl Carey  
Jack Kline

Ms. Joan Greene  
 845 Locust St  
 Mount Wolf, PA 17347  
 Phone (717) 266-0144  
 Acct. # 100020125652

Meter Reading Dates	Adjusted Readings	kWh Usage	Multiplier @ 40	Cost / kWh	Original	kWh Usage	Multiplier @ 40	Cost / kWh
April 29-Mar-02	556	19	760	68.4	637	0	0	0
25-Mar-02	537	30	1,200	107.75	637	24	960	86.40
25-Feb-02	507	30	1,200	107.75	613	28	1,120	100.80
25-Jan-02	477	30	1,200	107.36	585	138	5,520	496.80
<b>Total for estimated period.....</b>				<b>3,600 kWh</b>	<b>Total Original.....</b>	<b>7,600 kWh</b>	<b>\$ 684.00</b>	
24-Dec-01	Actual Reading	447			Actual Reading	447		

MET-ED EXHIBIT 3  
9-27-04 HRG

20029142

MET-ED - ACCOUNT STATEMENT  
JOAN GREENE  
845 LOCUST ST., MOUNT WOLF  
ACCOUNT NO. 10 00 20 1256 5 2

SERVICE TO	DAYS	RDG	TYPE	KWHS	BILL AMT.	LATE CHARGE	DUE DATE	PYMT. DATE	PYMT ADJUSTMENTS	BALANCE
11/27/01	33	417	A	1560	\$139.10	\$3.52	12/20/01			\$248.09
12/24/01	27	447	A	1200	108.64	2.81	01/22/02	11/30/01	200.00	387.19
01/25/02	32	585	A	5520	473.91	4.40**	02/20/02			187.19
02/25/02	31	613	A	1120	111.07	10.05**	03/18/02	02/07/02	100.00	295.83
03/25/02	28	637	A	960	94.67	7.12**	04/15/02	02/27/02	295.83	769.74
Rebill due to Overread								04/09/02	679.65 (1)	669.74
01/25/02	32	477	E	1200	111.76	4.40	04/29/02			780.81
02/25/02	31	507	E	1200	107.75		04/29/02			484.98
03/25/02	28	537	E	1200	107.75		04/29/02			579.65
04/23/02	29	556	A	760	70.73		05/13/02			100.00
05/22/02	29	572	A	640	65.09	4.47	06/11/02			Cr.
06/22/02	31	585	A	520	50.51		07/12/02	05/29/02	11.66(2)	297.99
07/24/02	32	592	A	560	58.19	4.29	08/13/02	05/30/02	65.09	286.31
08/23/02	30	622	A	920	85.50	1.23	09/13/02	07/02/02	50.51	336.82
09/23/02	31	631	A	360	38.36	1.28	10/15/02	07/29/02	200.00	286.31
10/22/02	29	642	A	440	45.11	1.28	11/12/02	07/31/02	58.19	286.31
11/21/02	30	655	A	520	51.84	1.28		08/30/02	85.50	171.81
								09/30/02	38.36	96.31
								10/31/02	45.11	124.67
										86.31
										131.42
										86.31
										138.15

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OCT 15 2004

DOCUMENT

**MET-ED - ACCOUNT STATEMENT**  
**JOAN GREENE**  
**845 LOCUST ST., MOUNT WOLF**  
**ACCOUNT NO. 10 00 20 1256 52**

SERVICE TO	DAYS	RDG	TYPE	KWHS	BILL AMT.	LATE CHARGE	DUE DATE	PYMT. DATE	PYMT ADJUSTMENTS	BALANCE
12/26/02	35	692	E	1480	132.74	1.28**	01/15/03	12/03/02	51.84	86.31
								01/13/03	132.74	219.05
									132.74	86.31
Credited off estimated bill 1/25/03										
01/24/03	64	734	A	3160	279.92		02/14/03		132.74	46.43Cr.
								02/05/03	148.46	233.49
02/24/03	31	779	A	1800	158.60		03/17/03		148.46	85.03
								03/30/03	158.60	243.63
03/26/03	30	810	A	1240	111.34		04/15/03		158.60	85.03
								04/08/03	111.34	196.37
04/24/03	29	836	A	1040	94.49		05/14/03		111.34	85.03
								05/02/03	94.49	179.52
05/22/03	28	854	A	720	67.49		06/11/03		94.49	85.03
								06/02/03	67.49	152.52
06/24/03	33	872	A	720	67.49		07/15/03		67.49	85.03
								07/07/03	67.49	152.52
07/25/03	31	884	A	480	47.25		08/18/03		67.49	85.03
								08/04/03	47.25	132.28
08/22/03	28	894	A	400	40.51		09/15/03		8.08 (3)	85.03
								08/11/03	1.28 (4)	76.95
09/23/03	32	999	E	4,200	361.03		10/14/03		1.28 (4)	116.18
								09/02/03	39.23	76.95
Credited off estimated bill 10/24/03										
									361.03	437.98
								10/13/03	50.55	76.95
09/23/03	32	905	E	440	43.88		11/13/03		50.55	26.40
Rebill										
10/24/03	30	917	A	480	47.25		11/13/03		40.42	70.28
								11/12/03	40.42	117.53
11/21/03	29	931	A	560	53.99		12/15/03		53.99	77.11
								12/01/03	53.99	131.10
12/23/03	32	958	A	1080	97.86		01/15/04		97.86	77.11
								12/31/03	97.86	174.97
01/23/04	31	998	A	1600	141.66		02/17/04		97.86	77.11
										218.77

**MET-ED - ACCOUNT STATEMENT**  
**JOAN GREENE**  
**845 LOCUST ST., MOUNT WOLF**  
**ACCOUNT NO. 10 00 20 1256 52**

SERVICE TO	DAYS	RDG	TYPE	KWHs	BILL AMT.	LATE CHARGE	DUE DATE	PYMT. DATE	PYMT ADJUSTMENTS	BALANCE
02/24/04	32	1044	A	1840	161.84		03/16/04	02/02/04	141.66	77.11
03/24/04	29	1070	A	1040	94.42		04/14/04	03/02/04	161.84	238.95
04/21/04	28	1085	A	600	57.32		05/12/04	04/01/04	94.42	77.11
05/22/04	31	1104	E	760	70.82		06/14/04	05/03/04	57.32	134.43
06/23/04	32	1104	A	0	6.76		07/15/04	07/01/04	70.82	77.11
07/26/04	33	1112	A	320	33.72		08/16/04	07/02/04	6.76	83.87
08/25/04	30	1120	A	320	33.72		09/15/04	08/02/04	33.72	77.11
								09/01/04	33.72	110.83
(1) Credited off bills covering period of 12/24/01 through 03/25/02.										
(2) Credited off late payment charges (12/24/01, 01/25/02, 05/22/02)										
(3) Credited off additional late payment charges (07/24/02, 08/23/02, 09/23/02, 10/22/02)										
(4) Credited off additional late payment charge (11/21/02)										
** These late payment charges were automatically reversed when the Company credited off the bills.										

Types Codes: A - Actual  
E - Estimate

C-20029142

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9-27-04 HRG

PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

In order for us to provide you with a bill that reflects an actual meter reading,  
please draw the exact position of the hands as they are on your meter.

0993

COMPLETED

AUG 25 2003

NJ - CSC

Please enter the Date of Reading 20 Aug 03 METER Number 946025384

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COMMONWEALTH OF PENNSYLVANIA  
COUNTY OF YORK

H. STANLEY REBERT  
DISTRICT ATTORNEY  
**RECEIVED**



COURT HOUSE  
28 EAST MARKET STREET  
YORK, PENNSYLVANIA 17401  
TELEPHONE  
(717) 771-9600

OCT 13 2004

PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU  
Joan Greene  
845 Locust Street  
Mt. Wolf, PA 17347-9509

December 26, 2002

C-20029142  
9-27-04 HRG

Re: Met-Ed Overcharges

Dear Ms. Greene:

I enclose for your review, our entire file concerning this matter including the memorandum prepared by Matthew Schelkopf, Deputy Prosecutor. I hope this will be of some benefit to you in your future dealings with Met-Ed.

Sincerely yours,

H. Stanley Rebert  
District Attorney

HSR/r

Attachments:

cc: Met-Ed (Brian Lowe)  
(w/ ENTIRE FILE)

**DOCKETED**  
OCT 15 2004

**DOCUMENT**

COMMONWEALTH OF PENNSYLVANIA  
COUNTY OF YORK

H. STANLEY REBERT  
DISTRICT ATTORNEY



COURT HOUSE  
24 EAST MARKET STREET  
YORK, PENNSYLVANIA 17401  
TELEPHONE  
(717) 771-9606

To: H. Stanley Rebert, District Attorney  
From: Matthew Schelkopf, Deputy Prosecutor *MS*  
Re: Joan Greene and Met-Ed  
Date: December 5, 2002

MEMORANDUM

After a thorough review of the above referenced subject, I have concluded the following:

Ms. Greene sent a complaint to our office on October 17, 2002 regarding the method of billing used by Met-Ed, her electric company. In this complaint she claims that Met-Ed used a method of billing in which they over billed her a total of 4000 kilowatt hours. Ms. Greene wishes to know how this could be done and believes it maybe done in an attempt to take advantage of older citizens in the community.

After reviewing all the paperwork it is apparent that Met-Ed determines their account billing on what is termed an "actual" and "estimated" basis of electric usage. For instance, Met-Ed may read the persons meter one month to determine the electrical usage, this being an *actual* reading. The next month, however, they may *estimate* the amount of electricity used by the customer based on the prior months bill. If the company's estimated reading is off, then the proper amount will be added or subtracted to the customer's account. This process is referred to as a "rebill" and an invoice of the correction will then be sent to the customer in order to inform them of the change.

In this instance, Met-Ed estimated the meter readings of Ms. Greene's residence for the months of January, February, and March of this year. The company's estimates were for a total of 7,600 kilowatts at \$684.00 over these three months. Ms. Greene disputed the charges whereby Met-Ed realized these estimated readings were in error. The correct amount of electrical usage over those months was only 3,600 kilowatts at a total of \$322.86. Accordingly, Met-Ed credited her account the appropriate amount. Furthermore, this overcharge and later credit was exactly for the 4000 kilowatts in dispute by Ms. Greene. For the foregoing reasons I believe that the overcharge was merely a mistake and has since been rectified by the company. Furthermore, there does not seem to be a pattern of overcharging older citizens to support the criminal allegations made by Ms. Greene. If Ms. Greene wishes to pursue this matter then perhaps she should be referred to the Consumer Protection Agency in the Attorney General's office to investigate the company's association with other customers.

Ms. Joan Greene  
 845 Locust St  
 Mount Wolf, PA 17347  
 Phone (717) 266-0144  
 Acct. # 100020125652

Meter Reading Dates	Adjusted Readings	KWh Usage	Multiplier @ 40	Cost / KWh
April	566	19	760	68.4
29-Mar-02	Adjusted	366	11200	110.675
25-Mar-02	Adjusted	301	12000	107.75
25-Feb-02	Adjusted	177	12000	101.46
25-Jan-02	Adjusted	140	12000	101.46

Total for adjusted period..... 3,600 \$ 322.86  
 KWh

Actual Reading 447  
 24-Dec-01

Original	KWh Usage	Multiplier @ 40	Cost / KWh
637	0	0	0
Estimated	24	960	86.40
Estimated	81	3,240	291.60
Estimated	85	3,400	306.00

Total original/estimates..... 7,600 \$ 684.00  
 KWh

Actual Reading 447

Joan Greene  
 845 Locust St  
 Mount Wolf PA 17347

Acct # 1000 20125652  
 Phone : (717) 266-0144

Date

2002

2002 Readings

40

2002 Readings

40

Eligible Billed Amount	Adjusted	KWh	Multiplier @ 40	Cost / KWh	Original	KWh	Multiplier @ 40	Cost / KWh
July 560	599	14	560	50.4	599	14	560	50.4
June 520	585	13	520	46.8	585	13	520	46.8
May 640	572	16	640	57.6	572	-65	-2600	-234
April 760	556	19	760	68.4	637	0	0	0

Month	Readings	Adjusted	CK Rdg	Multiplier	Cost
March	1200	507	1200	1200	108.00
Feb	1200	477	1200	1200	108.00
Jan	1200	447	1200	1200	108.00
Dec	1200	417	1200	1200	108.00
Nov	1560	417	0	0	0

Month	Readings	Adjusted	Multiplier	Cost	Estimate/Actual
March	1200	507	960	86.40	Estimated
Feb	1200	477	3240	291.60	Estimated
Jan	1200	447	3400	306.00	Estimated
Dec	1200	417	1200	108.00	Actual
Nov	1560	417	0	0.00	Actual

4800 \$ 432.00

8800 \$ 792.00

4360 KWh \$0.09 \$392.40

Carol Charlton  
 125 Highland Dr  
 Hiram Township, OH

Acct # 141 0093649-002  
 Phone : (440) 834-0726

Date	2002 Eligible Billed Amount	2002 Readings				2002 Readings Original
		Adjusted	kWh	Multiplier @ 40	Cost / kWh	
				40	0.09	
July	560	599	14	560	50.4	599
June	520	585	13	520	46.8	585
May	640	572	16	640	57.6	572
April	760	556	18	720	64.8	556
March	1200	538	31	40	3.6	537
Feb	1200	537	30	1200	108	532
Jan	1200	507	30	1200	108	477
Dec	1200	477	30	1200	108	447
Nov	1560	447	30	1200	108	417
Oct	1,000	417	39	1560	140.4	378
Sept	800	378	25	1000	90	353
Aug.	800	353	20	800	72	333
July	640	333	20	800	72	313
June	440	313	16	640	57.6	297
May	920	297	11	440	39.6	286
April	1,760	286	23	920	82.8	263
March	2,840	263	44	1760		219
Feb	2,920	219	71	2840		148
Jan		148	73	2920		75
		75	96	3840		9,979
12/27/00		9,979	56	2240		9923
11/27/00		9923	54	2160		9869
10/25/00		9869				

Grand Total

40

kWh	Multiplier @ 40	Cost / kWh	
		0.09	
14	560	50.4	
13	520	46.8	
16	640	57.6	
-81	-3240	-291.6	
24	960	86.4	Estimated
81	3240	291.6	Estimated
55	2200	198	Estimated
30	1200	108	
30	1200	108	
39	1560	140.4	
25	1000	90	
20	800	72	
20	800	72	
16	640	57.6	
11	440	39.6	
23	920	82.8	
44	1760		
71	2840		
73	2920		
96	3840		
56	2240		
54	2160		

C-70029142

9-27-04 HRC

Kwh Meter Test on 9/11/98  
Acct. # 100020125652

Joan Greene 845 Locust St., Mount Wolf, Pa

02/09/04 12:37:14 METER RECORDS SYSTEM  
OPTION: TRX: 6MT KEY: MMG46025384 09/11/981200

METER TEST RESULTS

TEST DATE: 09/11/98 1200 STANDARD: 9429 ENTERED: 09/15/98 1210  
TESTED BY: M8908 INDEX(AS FOUND): 8934.000 BOARD SETUP:  
SEAL-ID(AS FOUND) 0 INDEX(AS LEFT): 8934.000 COMEC:  
SEAL-ID(AS LEFT): 0 TEST FACTOR: 98 16 COMPANY OWNED METED  
RANDOM SAMPLE: STOCK NO: 00000045680

TEST LOC: 1 40M0 COMPENSATION TLC: .00 STATUS:  
TEST REASON: 02 PERIODIC PROGRAM COMPENSATION ITC: .00 PACKAGE:

FUNCTION	<	LL	FL	PF	>	FL	<A>	PF	FL	<B>	PF	FL	<C>	PF	WGHT	AVG
AS FND 1	100.10	99.80	.00	.00	.00	.00	.00	.00	.00	.00	.00	.00	.00	.00	.00	99.86
AS LFT 1	100.10	99.80	.00	.00	.00	.00	.00	.00	.00	.00	.00	.00	.00	.00	.00	99.86
AS FND 2	.00	.00	.00	.00	.00	.00	.00	.00	.00	.00	.00	.00	.00	.00	.00	.00
AS LFT 2	.00	.00	.00	.00	.00	.00	.00	.00	.00	.00	.00	.00	.00	.00	.00	.00
COMPENSATION																
AS FND 1	.00	.00	.00	.00	.00	.00	.00	.00	.00	.00	.00	.00	.00	.00	.00	.00
AS LFT 1	.00	.00	.00	.00	.00	.00	.00	.00	.00	.00	.00	.00	.00	.00	.00	.00
AS FND 2	.00	.00	.00	.00	.00	.00	.00	.00	.00	.00	.00	.00	.00	.00	.00	.00
AS LFT 2	.00	.00	.00	.00	.00	.00	.00	.00	.00	.00	.00	.00	.00	.00	.00	.00
SPECIAL	.00	.00	.00	.00	.00	.00	.00	.00	.00	.00	.00	.00	.00	.00	.00	.00

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SECRETARY'S BUREAU

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OCT 15 2004

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Met-Ed  
Exhibit 8

PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU PENNSYLVANIA PUBLIC UTILITY COMMISSION

BEFORE THE

JOAN GREENE

v.

METROPOLITAN EDISON COMPANY

Docket No. C-20029142

C-20029142

9-27-04 HRG

**PROPOSED STIPULATIONS OF METROPOLITAN EDISON COMPANY**

AND NOW, Respondent Metropolitan Edison Company ("Met-Ed" or the "Company") pursuant to Section 5.234 of this Commission's regulations, 52 Pa. Code § 5.234, proposes factual stipulations as follows:

With respect to the eight provisions of Complainant's Attachment 2 under prayer for relief, Met-Ed responded to the Complainant and hereby proposes as follows:

- Using their own two "actual" meter readings of 447 on 24 Dec 01 and 556 on 23 Apr 02, I want Met-Ed to verify that my electric meter says I used 4360 kilowatt hours of electricity for the period 24 Dec 01 to 23 Apr 02.

Response: You are correct. The meter readings indicate you used

4,360 kilowatt hours calculated as follows:  $556 - 447 = 190 \times 40 = 4,360$  kWh.

- Using their own bills for the period 24 Dec 01 to 23 Apr 02, I want Met-Ed to verify that they billed me for 8360 kilowatt hours as shown:

25 Jan bill	5520
25 Feb bill	1120
25 Mar bill	960
23 Apr bill	<u>760</u>
for a total of .....	8360

Response: For the original bills, you are correct.

- I want Met-Ed to verify that they overcharged and overbilled me for 4000 kilowatt hours of electricity for the period 24 Dec 01 to 23 Apr 02:

Met-Ed billed	8360
Electric Meter says I used	<u>4360</u>

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OCT 15 2004

**Met-Ed overcharged in kWhs.....4000**

Response: For the original bills which were not paid, you are correct.

4. In dollars, tell me the cost for the 4000 kWhs of electricity that Met-Ed overcharged on my bills, broken down into:

Generation Charges  
Transmission Charges  
Distribution Charges and  
Transition Charges

Response: For the original bills, see estimates below.

Generation Charges	\$182.15
Transmission Charges	\$ 6.88
Distribution Charges and	\$121.16
Transition Charges	<u>\$ 22.65</u>
	\$332.84

5. In dollars, tell me the cost for the 4360 kWhs that my meter says I used for the period 24 Dec 01 to 23 Apr 02, broken down into:

Generation Charges  
Transmission Charges  
Distribution Charges and  
Transition Charges

Response: For the original bills, see estimates below.

Generation Charges	\$ 200.23
Transmission Charges	\$ 7.49
Distribution Charges and	\$ 132.07
Transition Charges	<u>\$ 23.01</u>
	\$ 362.80

6. Give me information on where my multiplier of 40 comes from, as requested in my 25 Apr 02 letter.

For your residential electric service to the church building, metering transformers in addition to the kwh meter, are used. These devices are connected directly to the primary electric service wires serving your building. This equipment is used to change the energy level by a specific ratio to a smaller value continuously for any amount of energy used. The transformer's secondary wires are connected to the kwh meter. The transformer ratio size and wire connection determine the billing constant for actual energy used.

At locations like yours, you or the company must multiply the dial reading times the billing constant to get accumulated energy use (e.g., for one revolution of the meter disk, you would use 0.6 watt-hours times 40 or 24 watt-hours or 0.024 kilowatt-hours of energy.)

7. List the amount and date of each payment made toward the contested period 24 Dec 01 through 23 Apr 02, which would include the \$200 payment made under duress when I found a "48-hour Shut-Off Notice" taped to my door. It was received in Akron OH on 24 Jul at 7:39 p.m.

Response: All payments are reflected on the account statement provided. The payments made between November 30, 2001 and May 30, 2002 were as follows:

11/30/01	\$ 200.00
02/07/02	\$ 100.00
02/27/02	\$ 295.83
05/30/02	\$ 65.09

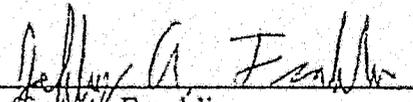
8. Assure me that I can continue to read my own meter and mail in the results five days before the scheduled meter-reading date and, most importantly, that M-Ed will use my reading to figure my bill. Especially during the coming Holiday Season of Christmas and New Years. Of course, Met-Ed is welcome to come out every few months to doublecheck the numbers on my electric meter dials so I can be sure I am reading my meter right. I want Met-Ed to assure me that they will, in a timely manner, continue to send the electric-meter forms which I need to read my own meter, or accept my meter-reading numbers in letter format if I do not have a form.

Response: Yes, you may continue to use the dial cards and read your meter as indicated on the instructions. Med-Ed will use its own actual meter readings when available and will use your readings when available in place of an estimated reading.

WHEREFORE, Metropolitan Edison Company hereby proposes the foregoing stipulations.

Respectfully submitted,

Dated: February 12, 2004

  
\_\_\_\_\_  
Jeffrey A. Franklin  
RYAN, RUSSELL, OGDEN & SELTZER LLP  
Attorneys for  
Metropolitan Edison Company