

3. Hire People that: (1) can read & understand the tariffs and electricity
(2) have not "sold out" to the Utility companies
4. The "Public" pays only for that part that is defined as their responsibility—NOT OUTSIDE their home!
5. Utilities are to CEASE & DESIST utility-caused disturbances
6. CEASE & DESIST Excess charges for duplications of verbiage & "manipulated" meter "paddings"
7. Stop the "Robotic" and "Prepared" cliché responses of your "Puppet" employees & Use Common Sense.
8. Replace "Company Employees" with "Thinking employees" Sample: Because I have the POTENTIAL doesn't mean it is In Use. Because I have lights in every room doesn't mean they are all on 24 hr/day or even every night on all night. Because I have tools, I don't use them all day. Because I have a Electric Heater doesn't mean I use it in July. Because there is an A/C in the window doesn't mean it "works." One of your Employees Seems to think these & says so!
9. If the Electric Company can't provide proper service w/o irregularities, then they should provide Home Owner with UPS type units for the Whole House
10. PAY For all equipment DAMAGED because of poor electric quality service. (I have Documented the damage is from the "Utility"!)

Attached to the complaint was a copy of the decision of the Bureau of Consumer Services in an informal complaint at BCS Docket No. 1331170. That document contained several handwritten comments apparently made by Mr. O'Toole. I will not quote that document, but simply note that from the text of the document and Mr. O'Toole's comments, the informal proceeding appears to concern allegations of high bills. There is also an indication that a meter test was performed by MetEd.

Mr. O'Toole's complaint was served on MetEd. On September 2, 2003, MetEd filed a motion for more specific pleading. In its motion MetEd averred that it was unable to discern the factual substance of Mr. O'Toole's complaint. MetEd's motion was accompanied by a

certificate of service stating that it was served on Mr. O'Toole by first class mail on September 2, 2003.

By letter dated September 8, 2003, This case was assigned to me for a ruling on MetEd's motion. Also on that date, the parties were informed of that fact by letter, and of the right of the Complainant to file a response to the motion within 10 days of the date that the motion was served.

On September 17, 2003, the Commission received from Mr. O'Toole a typewritten document of seven pages to which are attached copies of the following documents: a letter dated May 9, 2003, to Mr. O'Toole from the Manager of the Informal Complaint Unit of the Bureau of Consumer Services (BCS), and, MetEd's motion for more specific pleading. The latter two documents have handwritten comments on them. This entire filing appears to be a response to MetEd's motion for more specific pleading. I will not quote from the document, but note two points. In the typewritten document, Mr. O'Toole appears to state that his complaint involves three issues: he alleges that he is receiving poor quality service from MetEd because the line to his residence is sagging, because he is served by an old transformer, and because he is experiencing excessive power fluctuations; he complains that MetEd's tariffs are hard to understand; and, he complains that he is being billed for more electricity than he is using. He also alleges that the power fluctuations have damaged his appliances. Finally, all of the documents are replete with pejorative comments about MetEd and its employees and the Commission and its employees. These statements seem to indicate that Mr. O'Toole is dissatisfied with the manner in which MetEd and BCS have handled his complaints.

I also note that the seven page typewritten document appears to have been prepared on a computer using multiple typefaces and font sizes, as well as varying margins and indentations. In some cases, Mr. O'Toole changes typefaces and font sizes in mid-sentence, and uses excessively small font sizes. It appears that most of these irregularities were intended to

convey emphasis to points that Mr. O'Toole was trying to make; whether they accomplish that objective is debatable, but they do make the document difficult to read.

Discussion

A motion for a more specific pleading is a preliminary motion authorized by 52 Pa. Code §5.101(a)(4). In ruling upon such a motion, it is important to bear in mind that a complaint filed with the Commission is adequate if it gives the respondent notice and opportunity to defend; it need not be drawn with technical accuracy. *Green Cab Co. v. Hajucho, et al.*, 50 Pa. P.U.C. 745, 746 (1977). See also *Re Miley Detective Agency, Inc.*, 55 Pa. P.U.C. 189, 192 (1981); *Re Bickley's Auto Express, Inc.*, 52 Pa. P.U.C. 133, 137 (1978). However, due process in matters before the Commission requires that a party be afforded a reasonable opportunity to know the nature of its opponent's claims so that it can prepare a suitably responsive answer. *Honey Brook Water Co. v. Pa. Pub. Util. Comm.*, 167 Pa. Commonwealth Ct. 140; 647 A.2d 653 (1994); *Duquesne Light Co. v. Pa. Pub. Util. Comm.*, 96 Pa. Commonwealth Ct. 168, 507 A.2d 433 (1986).

A motion for a more specific pleading, under certain circumstances, is an inappropriate response to a complaint in the nature of an appeal from a BCS decision in an informal complaint case. If the basis of the complaint can be ascertained by reading the complaint in conjunction with the BCS decision, the respondent has sufficient notice of the nature of the complaint to prepare a defense. *Brown v. The Bell Telephone Co. of Pa.*, Docket No. F-9245562 (order issued July 31, 1992); *Barnes v. Pennsylvania Electric Co.*, C-881979 (order issued September 14, 1988).

Here, the original complaint itself appears to raise three issues (leaving aside the pejorative comments about the Commission and its employees): Mr. O'Toole claims to be experiencing excessive power fluctuations; he complains that MetEd's tariffs are hard to understand, and, he complains that he is being billed for more electricity than he is using. However, the allegations here are general claims with no specifics. The informal complaint

attached to the complaint dealt only with a billing dispute. On balance, I conclude that MetEd was justified in filing its motion. On the other hand, Mr. O'Toole's response to MetEd's motion contains sufficient information about each of these claims that MetEd should be able to file a response to it. It also expands the complaint somewhat by adding claims that the line to his residence is sagging, and that he is served by an inadequate transformer. Hence, I conclude that MetEd's motion is moot, and that MetEd should be directed to file an answer to the complaint as amended by Mr. O'Toole's response, within 20 days of the date of this order.

I also will advise Mr. O'Toole to avoid pejorative characterizations of others in any future pleadings that he files. The use of insult and invective does his case no good whatsoever. Moreover, scandalous and impertinent material in any pleading may be stricken from the pleading.

Finally, I will advise Mr. O'Toole that the Commission has a rule regarding the preparation of pleadings:

§ 1.32. Form of documents.

(a) *Typewritten.* Pleadings, submittals or other documents filed in proceedings, if not printed, shall be typewritten on paper cut or folded to letter size, 8 to 8 1/2 inches wide by 10 1/2 to 11 inches long, with left-hand margin not less than 1 1/2 inches wide and other margins not less than 1 inch. The impression shall be on only one side of the paper, unless there are more than four pages, and shall be double spaced, except that quotations in excess of a few lines shall be single spaced and indented. Reproduced copies will be accepted as typewritten, if copies are clearly legible.

Mr. O'Toole's typewritten response to MetEd does not comply with this rule. Because Mr. O'Toole is not an attorney, he should be given some leeway when it comes to such technical rules. Nevertheless, he is now on notice of the rule. He should refrain from filing any more pleadings in an irregular form. While he may think that he is being clever, it is counterproductive to needlessly irritate the people who will ultimately decide his case.

Order

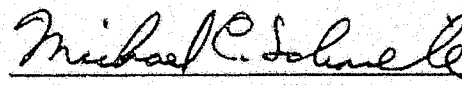
THEREFORE, IT IS ORDERED:

1. That Metropolitan Edison Company's Motion For A More Specific Pleading is denied as moot.

2. That Metropolitan Edison Company shall file an answer to the complaint as amended by Mr. O'Toole's response, within twenty (20) days of the date of this order.

3. That this case shall be set for hearing after Metropolitan Edison Company has filed its answer.

Date: Oct. 6, 2003


MICHAEL C. SCHNIERLE
Administrative Law Judge

LAW OFFICES
RYAN, RUSSELL, OGDEN & SELTZER LLP

ORIGINAL

SUITE 101
800 NORTH THIRD STREET
HARRISBURG, PENNSYLVANIA 17102-2025

TELEPHONE: (717) 236-7714
FACSIMILE: (717) 236-7816
WWW.RYANRUSSELL.COM
October 27, 2003

WYOMISSING OFFICE
SUITE 330
1105 BERKSHIRE BOULEVARD
WYOMISSING, PENNSYLVANIA
19610-1222
TELEPHONE: (610) 372-4761
FACSIMILE: (610) 372-4177

DOCUMENT
FOLDER

VIA HAND DELIVERY

James J. McNulty, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor
Harrisburg, Pennsylvania 17120

RECEIVED

OCT 27 2003

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

Re: Edward T. O'Toole v. Metropolitan Edison Company
Docket No. C-20030854

Dear Secretary McNulty:

Enclosed please find an original and three (3) copies of an Answer and New Matter filed on behalf of Metropolitan Edison Company in the above-referenced matter. This document has also been served on the parties of record as shown in the Certificate of Service.

If you have any questions, please contact me.

Very truly yours,

RYAN, RUSSELL, OGDEN & SELTZER LLP

Matthew A. Totino
Matthew A. Totino, Esquire

Enclosures
MAT:jab

c: As per Certificate of Service

135

ORIGINAL RECEIVED

OCT 27 2003

EDWARD T. O'TOOLE

v.

METROPOLITAN EDISON COMPANY

:
:
:
:
:

Docket No. C-20030854

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

**ANSWER AND NEW MATTER OF METROPOLITAN EDISON COMPANY
TO THE COMPLAINT OF EDWARD T. O'TOOLE, AS AMENDED**

TO THE PENNSYLVANIA PUBLIC UTILITY COMMISSION:

AND NOW, Metropolitan Edison Company ("Met-Ed" or the "Company"), by and through its counsel, Matthew A. Totino and Ryan, Russell, Ogden & Seltzer LLP, answers the above-captioned Complaint pursuant to Section 5.61 of this Commission's regulations, 52 Pa. Code § 5.61, as follows:

**DOCUMENT
FOLDER**

1. Admitted.

2. Admitted in part and denied in part. It is admitted that the Complainant is a residential electric customer of Met-Ed at Account No. 100017738285. Complainant's allegation that the Company's name is difficult to identify in the Company's tariff is specifically denied.

3. For purposes of this Answer, the several sentences of the paragraph containing Complainant's allegations have been restated and answered as follows:¹

**DOCKETED
OCT 29 2003**

¹ Complainant's averments and allegations have been re-stated nearly verbatim in the same or similar fashion as they appear in the complaint as amended. Please note that because the averments and allegations as restated in this answer have been bolded for clarity purposes, any bolded text from the complaint as amended was, in turn, italicized to note the additional emphasis placed on these words and phrases in the complaint.

- 1) **The following is NOT meant to be derogatory; it is meant to remind this Commission of its allegiance. Incorrect: Public Utility Commission. Correct: Public Utility Commission. Thus far, after maintaining six years in Pennsylvania, I have NOT found the above followed!**

Denied. The above statements do not contain any averments of fact or allegations of a violation of any law, regulation, or tariff by Met-Ed to which a response is required.

- 2) **The Commission is also reminded that the PUBLIC is not an "attorney" NOT SHOULD THE PUBLIC HAVE TO BE AN ATTORNEY!!!!!!!!!!!!!! Therefore, if this is NOT the so-called "format" for this MOTION, bluntly So What!!!**

Denied. The above statements do not contain any averments of fact or allegations of a violation of any law, regulation, or tariff by Met-Ed to which a response is required.

- 3) **I sent my Met-Ed complaint to the "PUC" over a month before it was "acted upon" and submitted to Met-Ed; who [when I called to see if my complaint had been received], I was told, Met-Ed had 20 days after receiving to "respond."**

Admitted in part and denied in part. Pursuant to the Commission's regulations, Met-Ed had 20 days from the date of service to file an answer to the complaint filed with the Commission at the above docket. It is specifically denied that Complainant sent his complaint to the PUC "over a month" before it was served upon Met-Ed. Complainant filed his complaint with the Commission at the above docket on or around July 21, 2003, while the complaint was served upon Met-Ed on or around August 11, 2003.

- 4) **However, I have been *informed* I have but 10 days to respond to Met-ED "motion."**

Admitted. Pursuant to the Commission's regulations and as per the Motion Judge Assignment Notice dated September 8, 2003, Complainant was informed that he had 10 days from the date of service of the motion to file a response.

- 5) ***Somehow, (to me) there seems to be a BIAS here! Met-Ed has a bevy of attorneys available ---- The PUBLIC is "by themselves." This (to me) adds to this Bias.***

Denied. It is specifically denied that Met-Ed has a "bevy" of attorneys available and that there is any "bias" here. Met-Ed has provided and continues to provide safe, adequate, and reasonable electric service to Complainant, consistent with Met-Ed's existing retail electric service tariff, the Pennsylvania Public Utility Code, and applicable regulations. Furthermore, counsel has represented and will continue to represent Met-Ed, consistent with the Public Utility Code, applicable regulations, and Rules of Professional Conduct. To the extent that the above statements contain any conclusions of law, no response is required.

- 6) **Met-Ed knows the PUBLIC cannot possibly obtain "tangible" evidence (so does the PUC) ---- but this "tangible" evidence still appears to be needed!**

Denied. The allegation that Met-Ed "knows" the "Public" cannot obtain "tangible" evidence is specifically denied. By way of further answer, Met-Ed is without information sufficient to form a belief as to the Commission's knowledge as represented in the above statement. To the extent that the above statements do not contain any averments of fact or allegations of a violation of any law, regulation, or tariff, no response is required. To the extent that the above statement contains any conclusions of law, no response is required.

- 7) **PUC is supposed to invoke "common sense!" especially with such "tangible" status, The PUC HEARING is NOT a COURT-OF-LAW. The PUC is supposed to be a "forum" for "the public," and dispense JUSTICE!**

To the extent that the above statements do not contain any averments of fact or allegations of a violation of any law, regulation, or tariff by Met-Ed, no response is required. To the extent that the above statements contain any conclusions of law, no response is required.

- 8) **ALSO: When reading the Met-Ed "tariffs," it is extremely difficult to understand just WHO the electric company is! Within the "tariff," so many DIFFERENT companies are referenced!**

Denied. Upon review and inspection of the relevant Met-Ed tariffs, the Company's name is clearly marked in the upper left hand corner of each page of its electric retail service tariff.

- 9) **In addition: IF read carefully, there are CONTRADICTIONS throughout!**

Denied. Met-Ed's Pennsylvania tariffs were prepared, filed, approved, and implemented in accordance with the Public Utility Code, the Commission's regulations, and applicable law.

- 10) **If read carefully, it is very obvious that the electric company wrote the tariffs to self-servingly benefit, advantage and profit themselves. WHY IS IT THAT THE PUC is allowing this to occur?????**

Denied. Met-Ed's Pennsylvania tariffs were prepared, filed, approved, and implemented in accordance with the Public Utility Code, the Commission's regulations, and applicable law. To the extent that any of the above statements do not contain any averments of fact or allegations of a violation of any law, regulation, or tariff, no response is required.

- 11) **Why doesn't the PUBLIC service commission HIRE competent, electrically-savvy people? It does not take a "rocket scientist" to see the "self-serving biases" throughout these "tariffs."**

Denied. Met-Ed's Pennsylvania tariffs were prepared, filed, approved, and implemented in accordance with the Public Utility Code, the Commission's regulations, and applicable law. To the extent that any of the above statements do not contain any averments of fact or allegations of a violation of any law, regulation, or tariff, no response is required. To the extent that the above statement contains any conclusions of law, no response is required.

- 12) **It also does NOT take an economics professional to unmask "extortion" matrices especially when the "fee" increases by the addition of an additional DIGIT! Though my USAGE has NOT INCREASED in any way, my bill has increased: HOW? With the addition of a "1" in front of what had been my total previous bill!!!**

Denied. Met-Ed specifically denies that Complainant's bills are inconsistent with his electricity usage. By way of further answer, the bills for electric service at Met-Ed Account No. 100017738285 are accurate. On April 7, 2003, the Commission's BCS issued a decision at No. 1331170 dismissing an informal complaint filed against Met-Ed by Mr. O'Toole alleging excessive billing. In its decision, BCS concluded that Complainant's meter tested accurately within Commission accuracy guidelines, which indicated that service was registering correctly on the meter. To the extent that any of the above statements do not contain any averments of fact or allegations of a violation of any law, regulation, or tariff, no response is required.

- 13) **AND: my "service" has actually "deteriorated" instead of modernized.**

Denied. Met-Ed has provided and continues to provide safe, adequate, and reasonable electric service to Complainant, consistent with Met-Ed's existing retail service tariff, the Pennsylvania Public Utility Code, and applicable regulations.

- 14) **The power-supply wires from the "road" to my meter are sooo old they sag so badly the farm combine barely can pass under them; These power lines are probably so "weather-corroded, conductivity is "hindered;"**

Denied. Upon reasonable inspection by two Met-Ed engineers on or about October 15, 2003, the referenced electric wires were found to be safe and have adequate clearance from the ground. The wires do not cross the driveway, and there is sufficient access to the farm fields. By way of further answer, Met-Ed has provided and continues to provide safe, adequate, and reasonable electric service to Complainant, consistent with Met-Ed's existing retail service tariff, the Pennsylvania Public Utility Code, and applicable regulations.

- 15) **The TRANSFORMER is of a 1940's vintage. The transformer supplying my property is grossly under-powered; being 10 or 15 KW. It should have been at least a 25 KW even in the 1970's - I have been told now 40+ KW.**

Denied. The transformer servicing Complainant's property is a 10 kva manufactured in 1963. Upon inspection by two Met-Ed engineers on or about October 15, 2003, the condition of the transformer, pole, fuse, and grounding was found to be safe and adequate. By way of further answer, Met-Ed has provided and continues to provide safe, adequate, and reasonable electric service to Complainant, consistent with

Met-Ed's existing retail service tariff, the Pennsylvania Public Utility Code, and applicable regulations.

- 16) Though "electrical usage" has geometrically increased since the 1940's, especially on FARMS, my "service" has NOT been upgraded. Why NOT???**

Denied. Met-Ed has provided and continues to provide safe, adequate, and reasonable electric service to Complainant, consistent with Met-Ed's existing retail service tariff, the Pennsylvania Public Utility Code, and applicable regulations. Moreover, Complainant has refused to comply with the Company's Commission-approved tariff provisions regarding the steps that a customer is required take to obtain a service upgrade. To the extent that the above does not contain any averments of fact or allegations of violations of any law, regulation, or tariff, no response is required.

- 17) Farms TODAY should be at least 600 amp. I have (a weak and uneven 200 amp!)**

Denied. Met-Ed has provided and continues to provide safe, adequate, and reasonable electric service to Complainant, consistent with Met-Ed's existing retail service tariff, the Pennsylvania Public Utility Code, and applicable regulations. Also, Met-Ed is without information or knowledge sufficient to form a belief as to the truth of the statements about electricity required for "farms today."

- 18) When the transformer fuse "blew," the truck does not even have it on-board. Fortunately, there was one left at the "shop."**

Denied. Met-Ed is without information or knowledge sufficient to form a belief as to the truth of the above allegations and demands proof thereof, if relevant, at hearing. Met-Ed further answers that the transformer servicing

Complainant's property uses the same fuses as the transformers that are currently installed by the Company.

- 19) **I am "responsible" for "cabling" from the meter in. Met-Ed wants me to pay from the road in and for the cost of the trench.**

Admitted. On or about September 17, 2002, Complainant requested a service upgrade to 600 amps. At the time of the request, Met-Ed's tariff required a customer requesting service for more than 400 amps to install his own underground service cable. Complainant refused to upgrade his service equipment, refused to supply and install the cable, and refused to open a trench.

- 20) **I am supposed to be in a "whirlpool" at least TWICE daily. I CAN'T DO THIS BECAUSE I don't have the "power." I have told Met-Ed of this Medical Need MANY TIME, but it has been IGNORED! Met-Ed is required to provide the POWER. They've told me I have to.**

Denied. Met-Ed has provided and continues to provide safe, adequate, and reasonable electric service to Complainant, consistent with Met-Ed's existing retail service tariff, the Pennsylvania Public Utility Code, and applicable regulations. Met-Ed is without information or knowledge sufficient to form a belief as to Complainant's medical needs and demands proof thereof, if relevant, at hearing. To the extent that the above statements contain any conclusions of law, no response is required.

- 21) **If I want to use the required-for-my-health whirlpool, I have to "travel," which is "hurtful."**

Denied. Met-Ed is without information or knowledge sufficient to form a belief as to the truth of the matters asserted in this averment and demands proof thereof, if relevant, at hearing.

22) PUC do your duty!

The above statement does not contain any averment of fact or allegation of a violation of any law, regulation, or tariff by Met-Ed to which a response is required.

23) Because of the lack of power, I cannot use some of the farm equipment I should be using. This presents quite a problem! I don't use the equipment as I don't have the "power" BUT Met-Ed states as I am not using the equipment, I don't need the power; This is a "catch 22" but Met-Ed is the catch.

Denied. Met-Ed specifically denies that it is providing insufficient power to Complainant's property. Met-Ed has provided and continues to provide safe, adequate, and reasonable electric service to Complainant, consistent with Met-Ed's existing retail service tariff, the Pennsylvania Public Utility Code, and applicable regulations. Met-Ed is without information or knowledge sufficient to form a belief as to the truth of the statements regarding Complainant's use of the farm equipment and demands proof thereof, if relevant, at hearing. To the extent that the above statements do not contain any averments of fact or allegations of a violation of any law, regulation, or tariff, no response is required.

24) I have much of MY wiring for the equipment IN! Can't use it because POWER NOT there. I even have the additional "panel" but can't activate this panel. POWER not there.

Denied. Met-Ed specifically denies that it is providing insufficient power to Complainant's property. Met-Ed has provided and continues to provide safe, adequate, and reasonable electric service to Complainant, consistent with Met-Ed's existing retail service tariff, the Pennsylvania Public Utility Code, and applicable

regulations. Any electrical problems that Complainant is experiencing are due most likely due to faulty inside wiring and equipment.

25) **Have NUMEROUS power fluctuations! Met-Ed says "prove it." I want the PUC to tell me HOW!**

Denied. After reasonable investigation, Met-Ed has been unable to confirm that Complainant is experiencing any voltage irregularities. Met-Ed has provided and continues to provide safe, adequate, and reasonable electric service to Complainant, consistent with Met-Ed's existing retail service tariff, the Pennsylvania Public Utility Code, and applicable regulations. To the extent that the above statements do not contain any averments of fact or allegations of a violation of any law, regulation, or tariff, no response is required.

26) **Have had much of my equipment and appliances "fail" due to these fluctuation[s]. These fluctuations have even PASSED THROUGH UPS units and destroyed them. I have (had) eleven "Uninterruptible Power Sources" - of which now only 3 work maybe. Each unit cost: \$1,800-2,200. Their demise: Continued Power Problems.**

Denied. After reasonable investigation, Met-Ed has been unable to substantiate that Complainant is experiencing any voltage irregularities and specifically denies that power provided by Met-Ed has caused any damage to Complainant's property. Met-Ed has provided and continues to provide safe, adequate, and reasonable electric service to Complainant, consistent with Met-Ed's existing retail service tariff, the Pennsylvania Public Utility Code, and applicable regulations.

- 27) **Lights continuously "blink" or change brilliance. Many of my fluorescent lights have FAILED because of the Fluctuations. TVs continuously "show frames" around the picture. VCRs continuously lose their programmed recording time. Computers lose their data, sometimes even the "saved" data; even crash. Met-Ed wants tangible proof. HOW? I have had to have them "serviced" and reprogrammed too-numerous-times-to-count.**

Denied. Met-Ed is without information or knowledge sufficient to form a belief as to the truth of the matters asserted in these averments and demands proof thereof, if relevant, at hearing. To the extent that the above statements do not contain any averments of fact or allegations of a violation of any law, regulation, or tariff, no response is required.

- 28) **Security system – with its cameras – have fouled up and required "repair," should not occur. TV channel amplifiers, which are usually non-destructible [except by current problems] have frequently had to be recalibrated or replaced. Garage doors go up by their selves and "remote-controlled" lights go ON by their selves.**

Denied. Met-Ed is without information or knowledge sufficient to form a belief as to the truth of the matters asserted in these allegations and demands proof thereof, if relevant, at hearing.

- 29) **These are only a few of the electrical [power] problems I experienced. There is NO WAY all of these things should happen by "normal" happenings = Common Sense!**

Denied. Met-Ed is without information or knowledge sufficient to form a belief as to the extent of the electrical problems that Complainant allegedly has experienced and demands proof thereof, if relevant, at hearing. By way of further answer, Met-Ed has provided and continues to provide safe, adequate, and reasonable

electric service to Complainant, consistent with Met-Ed's existing retail service tariff, the Pennsylvania Public Utility Code, and applicable regulations. To the extent that the above statements do not contain any averments of fact or allegations of a violation of any law, regulation, or tariff, no response is required.

30) PUC: Tell me how I can "TANGIBLY" "prove" this!!!! Met-Ed KNOWS and USES THIS and the PUC co-conspires!!!

Denied. Met-Ed is without any independent knowledge or information as to the occurrence and/or cause of the electrical problems that Complainant allegedly has experienced. By way of further answer, Met-Ed has provided and continues to provide safe, adequate, and reasonable electric service to Complainant, consistent with Met-Ed's existing retail service tariff, the Pennsylvania Public Utility Code, and applicable regulations. To the extent that above statements do not contain any averments of fact or allegations of a violation of any law, regulation, or tariff by Met-Ed, a response is not required. To the extent that the above statement contains any conclusions of law, no response is required.

31) Just recently, I spoke with Steven D. Ward [Met-Ed Chief Engineer] concerning a recent occurrence:

Admitted in part and denied in part. Mr. Ward's actual title is supervisor of regional engineering for Met-Ed. It is specifically admitted that Mr. Ward conducted at least two extensive conversations with Complainant about his electric service, and in particular, about complaints of voltage irregularities and inadequate service. Mr. Ward advised Complainant of what steps to follow if any future voltage irregularities were to occur as there were none at the time of the call. Mr. Ward also

advised Complainant of the requirements, processes, and procedures that were in place for a service upgrade.

- 32) **The [15 amp] circuit breaker on which I have a microwave "plugged" suddenly "popped." (I was standing near it and heard a low "snap" just before the "pop") It "popped" every time a reset. Breaker itself probably now "damaged." I moved the microwave; it now had a strange sound, but did not "pop" the breaker. I tried the microwave at FOUR DIFFERENT breaker outlets, No Pop!**

Denied. Met-Ed is without information or knowledge sufficient to form a belief as to the truth of the matters asserted in these statements and demands proof thereof, if relevant, at hearing.

- 34) **I then [using a meter] checked the house current: The VOLTAGE at several outlets read 88.8 volts for [after several cycles seen] about 12-15 seconds, then jumped to 120+ volts, the plus was a fluctuation between 120.2 and 120.4 volts. After about 30-45 seconds, back to 88.8 volts for 10-15 seconds. This fluctuation continued for almost an HOUR.**

Denied. Met-Ed is without information or knowledge sufficient to form a belief as to the truth of the matters asserted in these statements and demands proof thereof, if relevant, at hearing.

- 35) **ALSO: my garage doors keep opening and my remote lights keep going on. When I walked outside, I heard a low frequency, intermittent hum, but I did not see a "definite sparkling" but thought I could see an intermittent faint "glow" with the hum.**

Denied. Met-Ed is without information or knowledge sufficient to form a belief as to the truth of the matter asserted in this statement and demands proof thereof, if relevant, at hearing.

- 36) **However, the next day, I saw something else. The tree that is growing at the position that the electric pole "support" (and a "ground wire") enters the ground, THE LEAVES ON THIS TREE WERE SHRIVELED and Dying!!!! This tree was over grown with leave, so much so the wire was hidden; now, the leaves are gone and the wire is very visible – the tree looks like leafless winter!**

Denied. Upon reasonable inspection by two Met-Ed engineers on or about October 15, 2003, the condition of the transformer, pole, fuse, and grounding was found to be safe and adequate. Furthermore, the Met-Ed engineers saw no indication that the Company's facilities have in any way damaged the tree referenced in the above statements.

- 37) **I have attempted to contact Steven D. Ward several times since – and even left messages; but have NOT received any return calls or messages.**

Denied. It is specifically denied that Mr. Ward did not return Complainant's phone calls regarding his electric service. Mr. Ward recently placed a telephone call in response to a message left by Complainant. During this telephone call that lasted nearly an hour, Mr. Ward advised that the "breaker trips" about which Mr. O'Toole complained were evidence of an internal wiring and/or equipment problem.

- 38) **There is definitely something wrong with the transformer servicing my home! It is ONLY 10-15 kw (200 amp). FAR TOO SMALL for any "farm" or my need!**

Denied. Upon inspection by two Met-Ed engineers, the condition of the transformer, pole, fuse, and grounding is adequate, and the transformer is working properly. By way of further answer, Met-Ed has provided and continues to provide safe, adequate, and reasonable electric service to Complainant, consistent with Met-Ed's

existing retail service tariff, the Pennsylvania Public Utility Code, and applicable regulations.

39) PHASE TWO: My Bills Are Way Out Of Line!!!!!!!

Denied. Met-Ed specifically denies that Complainant's bills are "way out of line." By way of further answer, bills for electric service at Met-Ed Account No. 100017738285 are accurate. The Complainant's meter tested accurately within the Commission's accuracy guidelines, which indicates the service is registering correctly on the meter.

40) Upon purchasing this residence in Pennsylvania, I found several "flaws" with the electric service provided; and so notified the then-electric supplier - who promptly and laxly ignored me. Several of these "flaws" were: Supply lines that sagged to much; "Transformer" was far too old; Transformer too small for a "farm;" Supply wire to my meter showed [even then] extreme "aging."

Denied. Met-Ed specifically denies that the electric service provided to Complainant is "flawed" or that it has "ignored" Complainant. By way of further answer, Met-Ed has provided and continues to provide safe, adequate, and reasonable electric service to Complainant, consistent with Met-Ed's existing retail service tariff, the Pennsylvania Public Utility Code, and applicable regulations. Moreover, Met-Ed has had numerous contacts with Complainant concerning his electric service.

- 41) My electric bills were between \$25 and \$35/ month (after I had moved my furnishings in). I have NOT changed or added anything "electrical" since OR used any more electricity since! BUT: [after a few years] my bills began to INCREASE – at the same time as the "subscriber" was permitted to "elect" their own "supplier." MY BILLS ARE NOW \$130-170/month! WHY?

Denied. Bills for electric service at Met-Ed Account No. 100017738285 are accurate. The Complainant's meter tested accurately within the Commission's accuracy guidelines, which indicates the service is registering correctly on the meter. To the extent that any of the above statements do not contain any averments of fact or allegations of a violation of any law, regulation, or tariff, no response is required. To the extent that any of the above statements do not contain averments of fact or allegations of a violation of any law, regulation, or tariff, no response is required.

- 42) My TOTAL ELECTRICAL USAGE HAS NOT INCREASED and consists of: ALL of the below work WELL on a non-designated 15 amp breaker:

Refrigerator	Side-by-side	51.5 kw/month
Refrigerator	Freezer Below	42.5 kw/month
Refrigerator	Freezer Below	47 kw/month
Refrigerator (compact)	No Freezer	15.4 kw/month
Freezer	Upright	54.1 kw/month
Dehumidifier	Cellar	intermittent running
Microwave	Standard	used MAYBE 5x @ 4min/wk
Copy Machine		used MAYBE 8 min/mo 11A
Security System	w. camera	2 amp/wk at max.
VCRs	[recorded tapes viewed elsewhere]	4/day for 3hr or less
TV	[though have 7, only watch ONE/time]	1/day for 2-3 hr MAYBE
Computer		2-4hr/1-3 days/week MAYBE
Ceiling off-set fluorescent [12 w] light		1-3hr/day MAYBE
Clocks	10	ALL but one <i>battery</i> operated
Air Compressor used MAYBE once/2/3 mo.		1 hp (14A) 2-3 min/use

Denied. Bills for electric service at Met-Ed Account No. 100017738285 are accurate. The Complainant's meter tested accurately within the

Commission's accuracy guidelines, which indicates the service is registering correctly on the meter. With respect to averments regarding the individual appliances, Met-Ed is without information or knowledge sufficient to form a belief as to the truth of the matters asserted and demands proof thereof, if relevant, at hearing.

43) I have many other "electrical" appliances and equipment =but= are NOT "in use" and haven't been.

Refrigerators	X2	Washers	X2
Freezer	X1	Dryers	X2
Dehumidifiers	X2	TVs	X7

Denied. Met-Ed is without information or knowledge sufficient to form a belief as to the truth of the matters asserted and demands proof thereof, if relevant, at hearing.

44) **TOOLS: Have NOT used since coming to Pa. – most are buried behind other stuff!**

Table Saw Drill Press and many others

Denied. Met-Ed is without information or knowledge sufficient to form a belief as to the truth of the matters asserted and demands proof thereof, if relevant, at hearing.

45) This is mentioned because a certain (female) "Met-Ed Representative" made this statement: Upon a "visit" by her to "examine" my "appliance usage," this ridiculous statement: "Because there is the 'potential,' then the electric MUST have been used!"

Denied. It is specifically denied that a "Met-Ed Representative" made the above statement to Complainant concerning potential versus actual electricity usage. The Commission's Bureau of Consumer Services (BCS) decision dismissing Complainant's informal complaint filed at No. 1331170 did specify that, in referencing

the numerous electrical appliances at the customer's property, the potential for the billed usage did exist.

- 46) * Because my house is located at the base of a hill and at the end of a "run" of other buildings, the "wind" GUSHES through into my house!

Denied. The above statement contains impertinent information. In any event, Met-Ed representatives do not recall whether Complainant's house is located "at the base of a hill" or "at the end of a "run" of other buildings." In terms of the statement about the "wind," Met-Ed is without information or knowledge sufficient to form a belief as to the truth of the matter asserted and demands proof thereof, if relevant, at hearing.

EXPLANATION OF USAGE OF THE ABOVE:

- 47) ALL OF THESE APPLIANCES WERE BROUGHT FROM MY PREVIOUS HOME of which, this whole farm house would fit in the living room and foyer of the previous house! This is why there are so many "duplicated" appliances and may had been used by our kids.

Denied. The above statements contain impertinent information and Met-Ed is without information or knowledge sufficient to form a belief as to the truth of the matters asserted in the above statements and demands proof thereof, if relevant, at hearing

- 48) REFRIGERATORS: are rarely opened and when they are "open," are opened "slowly" and it is for a VERY short period of time [as I am the ONLY person here] and I am NOT here much, rarely during the day]. When I do arrive [between 11-1AM at night], I am more interested in "going to bed" than "sitting around!" I also usually "leave" between 10-11AM & eat out!
FREEZER: even more rarely opened! maybe once/week for 10 seconds.

DEHUMIDIFIER: is NOT running continuously – IS “OFF” more than “ON”

MICROWAVE: the “usual” setting is to warm (a “Big Mac,” etc.) at setting 1m23s@507.

COPY MACHINE: Last year, less than 350 copies made. Only used if needed 10+ copies made; If only a few, they are made “elsewhere” for me.

SECURITY SYSTEM: “camera” activated by a “motion sensor”; all through a “transformer”

VCRs These are set for specific channels, and all channels are usually NOT “recording” at the same time – but may “overlap” on occasion.

TVs Were in use by “the family” (including “the children”) at the other house!

CEILING off-set fluorescent [12 watt] LIGHT: First and foremost: I like Fluorescent Lighting; it is NOT “yellow!” Every room is so lighted; frequently by a “Remote” [less expensive than “wiring”] [as old farm houses did not have light switches at “convenient” places {such as at the doorways}]. Second: The power fluctuations [bright and dimming] (here) “burn out” incandescent light bulbs. Third: I don’t need much light, as I am rarely home – and when I am, my interest is mostly “getting sleep.” also, if a fluorescent light is place at the right position (side wall only inches from white ceiling) a bright light is NOT NEEDED. the low wattage will light the entire room. IF I do need brighter light, I use a (15+15 watt) desk lamp – “on” when needed, “off” when not. *My parents taught: “When you leave a room, turn off the light!”*

CLOCKS With the frequent “momentaries,” electric clocks don’t keep accurate time; With the frequent “fluctuations” in current, electric clocks lose time. I use one electric clock to “indicate” electric variances and “outages.”

AIR COMPRESSOR: When I require "air" for (farm equipment), I "fill" the compressor tank, then turn the compressor OFF, I have surplus "air" in the tank for the equipment. The (4' upright) compressor tank "holds" the "pressure" for at least one month plus!

Denied. Met-Ed is without information or knowledge sufficient to form a belief as to the truth of the matters asserted in the above statements and demands proof thereof, if relevant, at hearing.

49) As I have stated, MANY of these appliances were IN USE at the OTHER "BIG" FARM house, and are not only not in use here but not needed as: at the other farm. We, all FIVE OF US, lived but now, ONLY ONE lives here. The "children" have "moved-out" but took very little. They (a) did NOT move to a "farm." (b) didn't have room for much (c) wanted "new(er)" "stuff."

Denied. The above statements contain impertinent information and Met-Ed is without information or knowledge sufficient to form a belief as to the truth of the matters asserted in the above statements and demands proof thereof, if relevant, at hearing.

50) TOOLS: are MINE! If they want "tools," They get or lose their own! and did (even before moving).

Denied. The above statements contain impertinent information and Met-Ed is without information or knowledge sufficient to form a belief as to the truth of the matters asserted in the above statements and demands proof thereof, if relevant, at hearing.

- 51) **PHASE THREE: MANY of my appliances have been "corrupted," "damaged" or burned by the quality of electric power being supplied to me. TVs have had their "circuit boards" burn; VCRs have had their "functions" totally breached or destroyed; Incandescent light bulbs have "flashed" and "burned-out" [even new bulbs – thus – I don't use "incandescents" now]**

Denied. It is specifically denied that the electric service provided to Complainant has been or is substandard or has caused any damage to Complainant's property. By way of further answer, Met-Ed has provided and continues to provide safe, adequate, and reasonable electric service to Complainant, consistent with Met-Ed's existing retail service tariff, the Pennsylvania Public Utility Code, and applicable regulations.

- 52) **[AND: as I arrive "home" VERY late, I don't have ANY lights on for even an hour;] [I do NOT leave a light ON when I am NOT in that room.]**

Denied. Met-Ed is without information or knowledge sufficient to form a belief as to the truth of the matters asserted in the above statements and demands proof thereof, if relevant, at hearing.

- 53) **The garage door goes UP without being "remote" triggered; Certain "remote controlled" lights go ON without being "remote" triggered. My "security alarm" has been "triggered" when no "invasion" was immanent – sometimes, I have been "on premises" home;**

Denied. Met-Ed is without information or knowledge sufficient to form a belief as to the truth of the matters asserted in the above statements and demands proof thereof, if relevant, at hearing.

- 54) **VCR pre-programmed programs have been "terminated" prior to the programmed time (in the middle of a recording session) (more than one VCR and all at the same "timing");**

Denied. Met-Ed is without information or knowledge sufficient to form a belief as to the truth of the matters asserted in the above statements and demands proof thereof, if relevant, at hearing.

- 55) **I have been working on the computer when, all of the sudden, the computer "locks up" or "loses the material and will NOT allow recover {it's GONE!!!} or it turns itself off. Not only is the "work" LOST but must be recomposed. Sometimes, the computer has to be taken for "re-programming"!!!**

Denied. Met-Ed is without information or knowledge sufficient to form a belief as to the truth of the matters asserted in the above statements and demands proof thereof, if relevant, at hearing.

- 56) ***This does NOT make for a HAPPY CAMPER!!! This definitely does NOT make for a HAPPY CAMPER!!!***

Denied. The above statements do not contain any averments of fact or allegations of a violation of any law, regulation, or tariff by Met-Ed, to which a response is required.

- 57) **The fluorescent light(s) dim or brighten or "blips" [which really requires quite an electrical change] and the TV picture develops a THIN non-picture area around the edge or the picture "over-fills" and is slightly "distorted" or "blips"**

Denied. Met-Ed is without information or knowledge sufficient to form a belief as to the truth of the matters asserted in the above statements and demands proof thereof, if relevant, at hearing.

- 58) **I have been told that this problem is caused by ME; but have NOT been told HOW? MAINLY because: there is no way that I can cause this!!!**

Admitted in part and denied in part. After reasonable investigation, Met-Ed informed Complainant any electrical problems he was experiencing were due to internal wiring and equipment problems. To the extent that the above statements do not contain any averment of facts or allegations of a violation of any law, regulation, or tariff, no response is required.

- 59) **At times, I can HEAR strange noises emanating from the transformer on the pole (45') from my house. To verify the antiquity of the "transformer" when the "transformer" blew, the repair truck did not have one and said did not carry those that old and hoped they had one "back at the shop!" Upon their return, stated, "This is the last one. Hope this one doesn't "blow!"**

Denied. Upon inspection by two Met-Ed engineers on or about October 15, 2003, the condition of the transformer, pole, fuse, and grounding servicing Complainant's property was found to be safe and adequate. By way of further answer, Met-Ed has provided and continues to provide safe, adequate, and reasonable electric service to Complainant, consistent with Met-Ed's existing retail service tariff, the Pennsylvania Public Utility Code, and applicable regulations. Met-Ed is without information or knowledge sufficient to form a belief as to the truth of the above allegations regarding the antiquity of the transformer and fuse and demands proof thereof, if relevant, at hearing. Met-Ed further answers that the transformer servicing Complainant's property uses the same fuses as the transformers that are currently installed by the Company.

- 60) **PHASE BACKGROUND: When I was in school, "grants" were NOT easily obtained. I worked at every job to get tuition! Because of this, I had to obtain a variety of tools and experience! In a lot of areas!**

Denied. The above statements contain impertinent information and Met-Ed is without information or knowledge sufficient to form a belief as to the truth of the matters asserted in the above statements and demands proof thereof, if relevant, at hearing.

- 61) **Unfortunately for Met-Ed, they seem to have the opinion that I am "mentally challenged" electrically.**

Denied. The above statement is neither an averment of fact or allegation of a violation of any law, regulation, or tariff. Therefore, no response is required.

- 62) **Met-Ed also seems to think that because they say someone was at my home, they were. Camera.**

Denied. The above statement is vague and ambiguous and is neither an averment of fact nor allegation of a violation of any law, regulation, or tariff. Therefore, no response is required.

- 63) **Met-Ed has also told me that an "estimated bill" had to be issued as the meter reader could not get inside to read the meter. My meter is OUTSIDE!**

Admitted in part and denied in part. Complainant's meter was last estimated on or around December 12, 2002. Complainant's meter was last read on October 9, 2003, and is read on a monthly basis.

- 64) **Error also occur as frequently, the meter is read with the use of BINOCULARS from the truck.**

Denied. The Complainant's meter tested accurately within the Commission's accuracy guidelines, which indicates the service is registering correctly on the meter.

- 65) **This era of my life's experience is better explained and verified PERSONNALLY at the hearing!**

The above statement is not an averment of fact or allegation of a violation of any law, regulation, or tariff to which a response is required.

- 66) **Met-Ed wants my electrical problems to be BURIED, so the PUBLIC does NOT realize that this electric supplier is "gouging" the PUBLIC, and Met-Ed is attempting to use you to help them!**

Denied. It is specifically denied that Met-Ed wants any electrical problems that Complainant may be experiencing "to be buried." It is further denied that Met-Ed, an electric distribution company, is "gouging" the public. Met-Ed offers electric service in accordance with the rates, terms, and condition set forth in its tariff and in accordance with the Public Utility Code, the Commission's regulations, and applicable law. To the extent that above statements do not contain any averments of fact or allegations of a violation of any law, regulation, or tariff by Met-Ed, no response is required. To the extent that the above statement contains any conclusions of law, no response is required.

4. These sentences in paragraph 4 of the original complaint and on the first page of the complaint as amended represent prayers for relief to which no response is required. To the extent that these sentences contain any factual averments, the truth of the matters asserted therein is denied.

NEW MATTER

5. Paragraphs 1-4 of this Answer are hereby incorporated by reference as if set forth fully herein.

6. Upon review, the above complaint contains three primary allegations: (1) poor service quality as Complainant alleges the line at his residence is sagging, his transformer is too old, and he experiences excessive power fluctuations; (2) excessive billing as Complainant alleges he is being billed for more electricity than he uses; and (3) Met-Ed's tariff is difficult to understand.

7. On April 7, 2003, the Commission's BCS issued a decision at No. 1331170 dismissing an informal complaint filed against Met-Ed by Mr. O'Toole alleging excessive billing. In its decision, BCS concluded that Complainant's meter tested accurately within Commission accuracy guidelines, which indicated that service was registering correctly on the meter. Moreover, a BCS investigator conducted a site visit and noted that the numerous electrical appliances on Complainant's property indicated that the potential exists for the billed usage.

8. In terms of service adequacy, Met-Ed has provided and continues to provide safe, adequate, and reasonable electric service to Complainant, consistent with Met-Ed's existing retail service tariff, the Pennsylvania Public Utility Code, and applicable regulations.

9. The transformer servicing Complainant's property is a 10 kva manufactured in 1963 and is the same type of transformer used throughout Met-Ed's service territory. Upon inspection Met-Ed engineers Steven Ward and James T. Talley occurring on or about October 15, 2003, the condition of the transformer, pole, fuse, and grounding was found to be safe and adequate, and the transformer was functioning properly.

10. On or about January 31, 2001 to around February 13, 2001, the Company installed a voltmeter to record Complainant's voltage, which was recorded as normal.

11. Upon reasonable inspection by the two Met-Ed engineers on or about October 15, 2003, the relevant electric wires were found to be adequate and have adequate clearance from the ground. The wires do not cross the driveway, and there is sufficient access to the farm fields.

12. Any problems that Complainant is experiencing with his electricity are most likely due to faulty internal wiring and equipment and are not the result of inadequate service delivered by Met-Ed.

13. In fact, Complainant has refused to comply with the Company's Commission-approved tariff provisions regarding service upgrades. On or about September 17, 2002, Complainant requested a service upgrade to 600 amps. At the time of the request, Complainant was informed that Met-Ed's tariff required a customer requesting service for more than 400 amps to install his own underground service cable. However, Complainant refused to upgrade his service equipment, refused to supply and install the cable, and refused to open a trench.

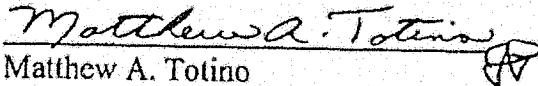
14. Met-Ed asserts that its electric retail service tariff is lawful in all respects. Met-Ed's tariff was prepared, filed, approved, and implemented in accordance with the Public Utility Code, the Commission's regulations, and applicable law.

15. At all times relevant to this Complaint, Met-Ed acted reasonably and in accordance with its existing retail tariff, the Pennsylvania Public Utility Code and the Commission's regulations.

WHEREFORE, Metropolitan Edison Company hereby requests that the Complaint of Edward T. O'Toole be dismissed with prejudice.

Respectfully submitted,

Dated: October 27, 2003


Matthew A. Totino
RYAN, RUSSELL, OGDEN & SELTZER LLP
800 North Third Street, Suite 101
Harrisburg, Pennsylvania 17102-2025
(717) 236-7714

Attorneys for
Metropolitan Edison Company

RECEIVED

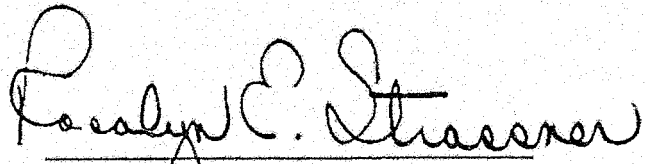
OCT 27 2003

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

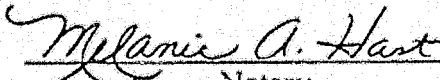
Edward T. O'Toole
Docket No. C-20030854

COMMONWEALTH OF PENNSYLVANIA)
: 55.
COUNTY OF BERKS)

Rosalyn E. Strassner being duly sworn according to law, deposes and says that she is the Business Analyst-Compliance for Metropolitan Edison Company ("Met-Ed"); that she is authorized to and does make this affidavit for it; and that the facts set forth above are true and correct to the best of her knowledge, information and belief and she expects the said Met-Ed to be able to prove the same at any hearing thereof.


Rosalyn E. Strassner

Sworn to and subscribed before
me this 25th day of August, 2003.


Notary

Notarial Seal
Melanie A. Hart, Notary Public
Muhlenberg Twp., Berks County
My Commission Expires Feb. 12, 2005
Member, Pennsylvania Association of Notaries

RECEIVED

OCT 27 2003

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

EDWARD T. O'TOOLE

v.

METROPOLITAN EDISON COMPANY

Docket No. C-20030854

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the Answer and New Matter of Metropolitan Edison Company upon the individuals listed below, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

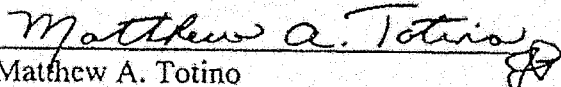
Service by Hand Delivery, postage prepaid, addressed as follows:

James J. McNulty, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor
Harrisburg, PA 17120

Service by First Class Mail, postage prepaid, addressed as follows:

Edward T. O'Toole
13152 Rennoll Road
Glen Rock, PA 17327

Dated: October 27, 2003


Matthew A. Totino
RYAN, RUSSELL, OGDEN & SELTZER LLP
800 North Third Street, Suite 101
Harrisburg, Pennsylvania 17102-2025
(717) 236-7714

Attorneys for
Metropolitan Edison Company

RECEIVED

OCT 27 2003

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

ORIGINAL

EDWARD T. O'Toole

v.

METROPOLITAN EDISON COMPANY

DOCKETED
FEB 24 2004

Docket No. C-20030854

RECEIVED
P.U.C.
SECRETARY'S BUREAU
NOV 14 11:10:39

RESPONSE TO PREVIOUS ADMONITION BY JUDICIARY

At the risk of alienating this judiciary assembled, I am a CITIZEN, NOT a lawyer. Though years ago, I was admitted to law school but chose medicine. However, I have the Constitutional "right" to represent myself, and, this "judiciary" has the responsibility to condone. This judiciary has NOT been granted any powers with which to demarcate the equality of the citizen as compared to one "enrolled" by "permission granted" of a styled vogue to so-represent the "citizenry". The CITIZEN is the POWER! IF you were to seek "health" counsel, you are not refused or admonished for not knowing the technical terminology of your illness; nor told to return when you are not exposing me to either your illness or lack of medical treatment knowledge. Instead, I greet you and listen as you tell me IN VERY POORLY DESCRIPTIVE LANGUAGE of your "sickness". The last time I remember, there is only ONE GOD =and= he is no longer in "human" form. Though, for quite some time, "courts" which I have beheld, have presented themselves as such, and lawyers as Apostles, especially in Pennsylvania. If this offends, so be it—but- I believe I still have the right to my opinion!

My previous written presentation was meant to "clarify", using print size as degree of importance or clarification. Since receiving your rebuke. I asked (double-digit) number of individuals [of all intellectual levels] if it was difficult to read. The response(s) was: "For the first few lines; then, (they) figured out the purpose (by themselves)."

The "Purpose": Eliminates need for "footnotes" or "narration", & need to "flip" to search out the location of said footnote, in other words. the "footnote" is physically placed at the site rather than at a "footnote reference code".
As many "footnotes" or "narrations" are seldom "read", this method allays such cumbrous exertion.

As for me: I have been using that format for decades - with NO complaints; even been told, it helped to re-locate specifics.

Why do I get the impression that: it doesn't matter whether the data is correct as long as it is written according to "rules"?
it doesn't matter if JUSTICE is served, but, the prevailing decision is rendered favoring the most disciplined presentation. Such a "presentation" has been rendered [and legal "loops" have been "leapt"] by Met-Ed in their response.

These "loops" are forged by "RHETORIC" -and- do NOT answer the question(s) asked! *as I see it!*

I have had LOTS OF TROUBLE with my computer(s) BECAUSE of the "electrical service" supplied;

I have UPS (uninterruptible Power Source) units ON-LINE with my computers, but the power problem passes through!
I KNOW why! but Met-Ed states I am WRONG! *NASA says I'm RIGHT!*
AND: several of these are NOW "defective" - because of the flawed power service supplied!

Met-Ed has REFUSED to co-operate with the telephone service to install BURIED CABLE

DOCUMENT *60*

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

EDWARD T. O'Toole

vs

Docket No. C-20030854

METROPOLITAN EDISON COMPANY

DOCKETED
FEB 24 2004

FIRST AND FOREMOST:

**This Complaint definitely should IN NO WAY be "DISMISSED" in any form!
contrary to the final "wherefore" and "hereby" proffered by "Metropolitan Edison Company";
especially as the "complaint" was rendered toward "Met-Ed"; reference within below**

It is IMPOSSIBLE to answer almost all of my questions with the same answer [rhetorical phrase]!

WHY is this court allowing such response(s)? Met-Ed needed "more time" to respond thusly?
Met-Ed had twice-as-much time as I had been given.

Though my questions were written in ENGLISH, it would appear Met-Ed's "mother-tongue" is not English.

Met-Ed "averts" my claim has no bases, and uses as their "bases" that no tangible proof is offered, knowing full well
one can NOT give TANGIBLE PROOF of an INTangible commodity.

Especially when that "commodity" is CONTROLLED by the one requesting the physical appearance of the commodity.

Example: One canNOT show that a light bulb is burned-out by flipping a switch, when that "switch" is controlled elsewhere.

If a "condition" is "sporadic", one canNOT have the "condition" perform "on cue"! esp. when the "cue" is given elsewhere.

IF: the "rhetoric" elicited by Met-Ed is "legally acceptable", then [maybe] this Commission should evaluate the accuracy of
the "law" as it should be written to protect the PUBLIC, [and NOT provide the utility with a "life-boat" from which to abuse].

When the answer to a question is simply the single word "admitted", just what is being "admitted"?

I would think that the person reading should NOT have to reference several other documents to "understand".
This was the "complaint" of Met-Ed concerning my submission. Good for the goose? good for the gander!

The Company's name IS difficult to identify within the tariff! Your Honor should re-visit these tariffs and read
totally; and, it will become clear that the company identified **changes** back-and-forth – just as I stated!

This is demonstrated even within their response.

The complaint is rendered against "Met-Ed", but the heading is "Metropolitan Edison Company". referenced from above

Within the tariffs, there are further such references to other "companies". & no place is there inclusion properly addressed!

*If I were to write accordingly, I would be charged with "malpractice" and "drummed out of the profession"!
a "cold", the "common cold", pneumonia, and the "flu" are NOT the same!!!*

DOCUMENT

*NONE of the "companies" named are EXACTLY the "same"! but the tariff treats them as such!
Where are the Commission's "regulations readers" when this dupery is being perpetrated?*

What in the . . . is footnote "1" "averring"??? It seems to LEGALLY attempt to confuse -&- MY questions were ???
Ryan, Russell, Ogden & Seltzer LLP appear to be attempting to confuse this complainant, in that 4 copies of page one were sent to complainant as if they were continuities of RRO&S's response. *A waste of complainant's time (reading & sorting)!*

[page 2; item 1] *"Denied the above statements do not contain any averments of fact or allegations of a violation of any law, regulation, or tariff by Met-Ed to which a response is required."*

^{Complainant continuation} BUT: a definite reminder to the court who this court is "commissioned" to "help"! Thus: response IS needed.

[item 2] The "typo" misspelling of the word "NOR" as "NOT" is definitely, to any literate person, OBVIOUS!
The response given, however, is definitely "rhetorical" and (in the language of "government") BOILER-PLATE!
REMINDER (to both Met-Ed & the Commission): "PUBLIC" should NOT be expected to know your "language" = as the PUBLIC does NOT expect YOU to know THEIRS [& I do NOT expect you to know mine --but- Met-Ed apparently expects either "the public" to know --or- to "befuddle" "the public" with "razzle-dazzle" vernacular].

[item 3] *"pursuant to the Commission's regulations, Met-Ed had 20 days from the date of service"*

but Met-Ed extended that time by submitting an "interim" format, stating could not understand complainant's submission.

WHY did Met Ed's attorney's need the additional time when their subsequent answers were rhetorically repetitious?
and still not responsive to the question(s) asked?

Complainant's thinking. If Met-Ed "confuses" with rhetoric the complainant, and complainant does not timely follow-through,
PUC can ignore the complainant's complaint =&= Met-Ed is "off-the-hook" again!

[Page 3 . item 4] There appears to be a BIAS, of which neither Met-Ed nor PUC has addressed:
20 days for Utility to respond 10 days for Public to respond UNFAIR ADVANTAGE!

[item 5] *"It is specifically denied that Met-Ed has a "bevy" of attorneys . . .*

This complainant may be misguided, but: a "representation by Ryan, Russell, Ogden, Seltzer, plus "para-legals"
the last time I counted this constitutes a "LARGE GROUP", which, as defined in several **different** authored dictionaries,
is defined as "BEVY"! The names of these dictionaries are available, if desired Could it be that this "bevy" is implying this "court" is unlettered?
"PUBLIC", though inferred plural, is frequently [herein] singular!

"Met-Ed has provided and continues to provide safe, adequate, and reasonable electric service . . . ,
consistent with Met-Ed's existing retail electric service tariff."

ISN'T THIS WHAT IS BEING QUESTIONED????????????? How can the answer to a question be the question?

Dissection of this statement: "Met-Ed" = but the "Defendant" is Metropolitan Edison Company, NOT Met-Ed!
"has provided" = That fact may be true - some decades ago!!!! My service is 60 years old!
60 years ago: NO TV, NO Jet engines, NO Microwave ovens, NO ... (U get the pt)
"... continues to provide" = **exactly** that which was provided (to this residence) 60 years ago!
"... safe" = NOT when it DENUDES my tree, NOT when the wires SAG, NOT ... (U get the pt again)
"... adequate" = That's what this complaint is partially concerning! I canNOT use much of TODAY'S

electrical products [including a **medically-needed whirl-pool**] because "supply" INadequate
CanNOT "bake" & "cook" at the same time -or- MAIN breaker snaps! NOT inside wiring!
" ..reasonable" = NOT when my USAGE has NOT increased, but my BILL HAS: TEN-FOLD!
The supposition that the POTENTIAL is there, doesN'T CUT IT!
My "potential" was "forwarded" from a location that provided 800 amp service
My "potential" has had its "legs" cut at the HIP! as such, potential of crutches, still not able to "walk"!
IN ADDITION: Ask ANY "PUBLIC" concerning BOTH their efficient supply & cost!
BUT BEFORE DOING SO: bring your fire extinguisher (for your ears).
" .. consistent with ... existing retail electric service tariff" = two queries within this statement:
What is meant by "RETAIL" & Why was this word employed? I am not "retail"!
Question the inclusion of "existing". This indicates (to me) that MET-Ed KNOWS!
and: does NOT want to REVISE, even though it is in DRASTIC NEED of such!
WHO WROTE these "tariffs"? More importantly: WHY wasn't **competently REVIEWED** by PUC
EVEN MORE IMPORTANTLY: WHY haven't these tariffs been MODERNIZED
MODERNIZED to benefit the PUBLIC, not the POWER COMPANY?????

"no response is required" = is a pile of! and, I would hope that this PUC officer KNOW THIS!
IF Met-Ed were to "respond", any response would corroborate the tenants of my #5!

The PUC is mandated to PROTECT THE PUBLIC!

PUC should be ashamed of themselves for allowing Met-Ed's RHETORICAL responses - both at this hearing AND publicly!

[item 6] *"The allegation that Met-Ed "knows" the "public" cannot obtain "tangible" evidence is specifically denied."*

BUT: Met-Ed does NOT state the "tangible evidence" to be presented WHY NOT? BECAUSE: Not Tangible!

Met-Ed continues by stating: *"Met-Ed is without information sufficient to form a belief as to the Commission's knowledge as represented in the above statement. Met-Ed may be accurate as to the commission's knowledge (& if I were the PUC, I would take offence to the indication that the PUC is not intelligent enough to "know" the intangibility of electricity),*
-BUT- Met-Ed, themselves, KNOW "electricity" is an INtangible entity!
and. by there "rhetorics" herein, subliminally ["below-the-radar"] admit to this FACT!

"no response is required" = BECAUSE: IF responding, Met-Ed would have to ADMIT "non-tangibility"!

In The Interest Of Engendering A Continuation Of Physically hurdling Between my submission and that of Met-Ed,
the "anecdoted" Met-Ed presentation will now be submitted in place of a voluminous reiteration of that being "dissected".
Should this not be satisfactory [to the PUC], inform me thus & the above type "dissection" can be submitted.

HOWEVER: this Complainant would like to remind PUC that COMMON SENSE should prevail!

Please take note of Page 18, mid & Page 23, bottom!

NOT allowance to Met-Ed : Metropolitan Edison Company *which ever* to respond in non-responsive rhetoric!

It is also requested that Met-Ed : Metropolitan Edison Company be **compelled** to RESPOND pertinently to each
question posed by Complainant, and NOT with the rhetorics so flagrantly scribed.

OTHERWISE, Complainant's quest for information has been not only "side-roaded : side:tracked" but PREVENTS PROPER
PRESENTATION at [or prolongation of] HEARING!

Met-Ed RAPIDly asked for "penalties" when Claimant was (falsely) "accused" of not FULLY responding to their queries!!!

This claimant-petitioner asks for "penalties" from Met-Ed for the dupery attempted against all "public".

* In the 1940's and even in the 1970's, the police depended upon strategically placed stationary call phone boxes.
In the 1940's (the era of the installation of the electrical service to my residence)
In the 1970's (the era of the granting of my right-of-way servicing my residence)
In the 1990's (the era in which I inherited this antiquated, insufficient service)

much was DIFFERENT!

As I [and you, & ALL of UJS] am now living in the 21st century, with 21st century technologies (& electrical needs) and electronics, and paying 21st century fees for electricity (service), 21st century electrical service should be supplied! as demands have greatly changed! The 200 amp service was definitely adequate in 1940 as at that time, lighting & radio and fans were basically the only things constantly using electricity -but- no where near adequate now! as almost every "convenience item" is electrically "driven". in 1940, homes had usually ONE radio, in 2000, homes have No radios, BUT!!!

My farm has undergone many wiring modifications since 1940 = my farm didn't even have electricity when built [1884].
My farm has undergone more wiring modifications since 1970 = Met-Ed (& its predecessors) have made NO CHANGE!
Met-Ed, etc. CLAIM of within their tariff, they are ADEQUATELY supplying : HOW?

Today's farm cannot function on 200 Amp service! Most present homes have a hard time with only 200 Amp service. The year 1970 was less than 3/4th through the 20th century and the demand exceeded the supply; how, then, can 200 Amp be appropriate now that the 21st century is with us? Even 800 Amp will soon be "antiquated". The current TARIFF is antiquated!

I have been accused of having inadequate and antiquated and defective internal wiring. This is a bunch of! I, personally, have had the electrical service within evaluated [for "Defects"] AND IMPROVED! When the "supply" was extended to this farm, there was ONE FUSE for the entire of the house - no electricity for the farm buildings. Since that time, a now defunct "fuse block" was installed; since that time I "small" "Breaker" box replaced the "fuse block".

Met-Ed's predecessor made NO UP-GRADE!

The one small breaker box ("breakers" are NOT a "1940" commodity) has been AUGMENTED by TWO-40 breaker boxes!

Met-Ed's predecessor has made NO UP-GRADE!

Only about 30 (of the 100+) breakers can be utilized -and- those mostly 15 amp capacity. & this is "taxing" the service!

Met-Ed's predecessor still has made NO UP-GRADE!

IF my furnace (blower) comes on, I can NOT have my microwave on and use my can-opener at the same time; the microwave breaker "pops" off -- for two reason: (1) the microwave draws 12.8 amp, spiking to 14.2 amp when "cycling"; (2) the furnace (oil) injector motor, when coming on, "spikes" at the 200 Amp, and the "lower" breaker "pops" (that being the microwave breaker). IF I were to "think" of using any one of my (floor-model) power tools, I would have to turn OFF the furnace. This "blows" the "POTENTIAL" theory "all-to-...." It also "blows" the "adequate service" statement.

My WhirlPool (medically needed) canNOT possibly be used as it alone requires 50 Amps!

WHEN this 1884 farm-house was "electrically wired", electricity was used only for "lighting". That [two-wire] wiring has long-since been REPLACED! The "wiring" in this 1884-built farm-house now has a "plastic" coated 3 wire. [Tar-coated fabric wrapped wire was replaced totally in the marketplace in the 1980's.] This "sort-of-kind-of" negates the Met-Ed contention of poor & inadequate wiring!

Met-Ed is still supplying my home with the CORRODED 1940's wire!

Using the premise of Met-Ed, the "culprit" for poor electric is Met-Ed, as they are still supplying through 1940s equipment. I, the "modern-day consumer" is attempting to fly the super-sonic jet plane using the V-2 "buzz-bomb" engine!

Using what Met-Ed calls "adequate electrical supply" to operate today's "normal household appliances"

is like Lindbergh attempting to race the Concord from the United States to Europe!

Though tri-wheel tractors may still be used, very few farmers use them -&- tractor is now equipped with cab, A/C, radio, etc.

In the 1940s, automobiles were rapidly destroyed driving at 40 mph for 50,000 miles; NOW: 80-90 mph is OK for 200,000 mi.

Can you imagine carrying a "cell phone" with a rotary dial?

In the 1970s, even a "cell phone" was a DREAM!

The police 1950s "call-box" has been replaced with "individualized personally carried" two-way radio with many "stations"!

In 1940, the "home" had ONE radio (TV was a DREAM); in 1960, the "home" had ONE "black-&-white" television; in 1980, the "home" might have TWO televisions -one of which was probably "black-&-white" -and- NO VCR; & one phone. in 1990, the "home" had many TVs, ALL color, and several VCRs (depending on how many children were in the home) and usually "Hi-Fi" in each child-room as well as one computer. In The Year 2000, WOW!!! & 200 Amp doesn't "cut it"!

This is 2003 and I still have 1940s 200Amp service

IF I were to still have children "at home", I can't even imagine the "feuding"! and the electric need has NOT even "peaked"!

Can you imagine how differently the Second World War would have been fought if 21st century technologies were available? Think of how many soldiers died PARACHUTING when they could be AIR-LIFTED by HELICOPTER to their destination! Think of the fact night is day with "night-vision" glasses! Observation plane losses need not occur with "Spy-In-Space"!

More Horrendous: How the war with Iraq would be changed if we were restricted to the 1940's (even 1970s) technology? 1940's & Korea-time, TELEGRAPH, using "clicks" was used to transmit "written" messages, to specially equipped locals;

NOW: almost EVERY HOME can "receive" WRITTEN messages, even pictures, by way of "FAX" [even from cell phones]

Why, then, does this commission allow the CLAIM that 1940s electrical supply is adequate for 2000's technology?????

Even the Met-Ed personnel carry cell phones; and use them when calling the public to inform them that, as there is NO PROBLEM with still using 1940's Met-Ed antiquated equipment & supply, the PUBLIC should be happy with the 20th century, antiquated supply – even if it is INSUFFICIENT for today's technologically sophisticated appliances!

It is incumbent upon this Commission to instruct, NO, mandate this so-claimed modern electric company to become MODERN! and: supply me with 21st century “amperage”, especially as there is a definite MEDICAL NEED for such! ALSO: instruct Met-Ed to “cease & desist” the chicanery they are employing to extort funds not due & in the process of so doing, destroying our 21st century electronics! *This chicanery was also disclosed on NBC TODAY on November 11 @ 9:AM!*

One other that should be commanded. Cease & Desist attempting to coerce those with electrical knowledge to agree with the premise put forth by Met-Ed that “customers” are “ELECTRICITY-STUPID”!

MY NEEDS ARE SIMPLE: Supply me with the [21st century] 800 Amp service that a farm of my size requires;

Supply this service as UNDERGROUND, [as the “method of choice” within ALL utility companies NOW.]

& do it *post-haste* as the telephone service is waiting & so is my MEDICAL NEED!

Remove the 60-year old poles. which not only show their age, but as all aged, are “bent”.

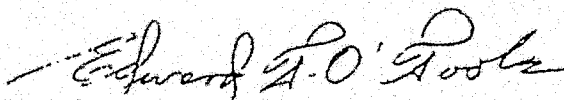
Stop augmenting the electricity used & hiding charges using ambiguous & duplicitous language.

This “installation” should be at no cost to me as:

the [antiquated] Tariff [even] provides for ADEQUATE AND SUFFICIENT ELECTRICAL SERVICE

the time and frustration Met-Ed has caused me –as well as– there is a MEDICAL NEED
thus: ADEQUATE & SUFFICIENT is NOT being SUPPLIED!

A L S O : The TARIFF should be REwritten to today's needs =&= to benefit the PUBLIC =&= NOT by Met-Ed!



Edward T. O'Toole

13152 Rennoll Road
Glen Rock, Pennsylvania
17327
717 235 9366

November 12, 2003

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

EDWARD T. O'Toole

vs

Docket No. C-20030854

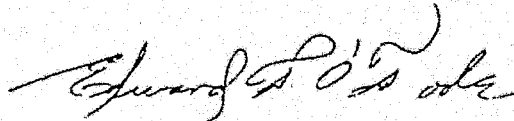
METROPOLITAN EDISON COMPANY

CERTIFICATE OF SERVICE

James J. McNulty, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor
Harrisburg, Pennsylvania 17120

I hereby certify that I have this day served a true copy of a **Response To Answers & New Matter** upon the Metropolitan Edison Company and its attorney(s), [presumably] in accordance with the requirements.

Ryan, Russell, Ogden ^ & Seltzer LLP
800 North Third Street, Suite 101
Harrisburg, Pennsylvania 17102-2025



Edward T. O'Toole
13152 Rennoll Road
Glen Rock, Pennsylvania
17327
717 235 9366

LAW OFFICES
RYAN, RUSSELL, OGDEN & SELTZER LLP

SUITE 101
800 NORTH THIRD STREET
HARRISBURG, PENNSYLVANIA 17102-2025

TELEPHONE: (717) 236-7714
FACSIMILE: (717) 236-7816
WWW.RYANRUSSELL.COM
October 27, 2003

WYOMISSING OFFICE
SUITE 330
1105 BERKSHIRE BOULEVARD
WYOMISSING, PENNSYLVANIA
19610-1222
TELEPHONE: (610) 372-4761
FACSIMILE: (610) 372-4177

VIA HAND DELIVERY

James J. McNulty, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor
Harrisburg, Pennsylvania 17120

Re: Edward T. O'Toole v. Metropolitan Edison Company
Docket No. C-20030854

Dear Secretary McNulty:

Enclosed please find an original and three (3) copies of an Answer and New Matter filed on behalf of Metropolitan Edison Company in the above-referenced matter. This document has also been served on the parties of record as shown in the Certificate of Service.

If you have any questions, please contact me.

Very truly yours,

RYAN, RUSSELL, OGDEN & SELTZER LLP

Matthew A. Totino
Matthew A. Totino, Esquire

Enclosures
MAT:jab

c: As per Certificate of Service

What "New Matter"??
The responses given are all exclusively phlegmatic / non-responsive!

Not Our Answer was Terrible

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Met-Ed overs my claim
has no bases but Met-Ed
uses worse logic, called
Rhetoric
To avoid answering!

EDWARD T. O'TOOLE :
 :
v. :
 :
METROPOLITAN EDISON COMPANY :

Docket No. C-20030854

ANSWER AND NEW MATTER OF METROPOLITAN EDISON COMPANY
TO THE COMPLAINT OF EDWARD T. O'TOOLE, AS AMENDED

TO THE PENNSYLVANIA PUBLIC UTILITY COMMISSION:

AND NOW, Metropolitan Edison Company ("Met-Ed" or the
"Company"), by and through its counsel, Matthew A. Totino and Ryan, Russell, Ogden
& Seltzer LLP, answers the above-captioned Complaint pursuant to Section 5.61 of this
Commission's regulations, 52 Pa. Code § 5.61, as follows:

1. Admitted.
2. Admitted in part and denied in part. It is admitted that the

Complainant is a residential electric customer of Met-Ed at Account No. 100017738285.
Complainant's allegation that the Company's name is difficult to identify in the
Company's tariff is specifically denied.

3. For purposes of this Answer, the several sentences of the
paragraph containing Complainant's allegations have been restated and answered as
follows:

¹ Complainant's averments and allegations have been re-stated nearly verbatim in the same or similar fashion as they appear in the complaint as amended. Please note that because the averments and allegations as restated in this answer have been bolded for clarity purposes, any bolded text from the complaint as amended was, in turn, italicized to note the additional emphasis placed on these words and phrases in the complaint.

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

EDWARD T. O'TOOLE

v.

METROPOLITAN EDISON COMPANY

:
:
:
:
:

Docket No. C-20030854

ANSWER AND NEW MATTER OF METROPOLITAN EDISON COMPANY
TO THE COMPLAINT OF EDWARD T. O'TOOLE, AS AMENDED

TO THE PENNSYLVANIA PUBLIC UTILITY COMMISSION:

AND NOW, Metropolitan Edison Company ("Met-Ed" or the "Company"), by and through its counsel, Matthew A. Totino and Ryan, Russell, Ogden & Seltzer LLP, answers the above-captioned Complaint pursuant to Section 5.61 of this Commission's regulations, 52 Pa. Code § 5.61, as follows:

1. Admitted.
2. Admitted in part and denied in part. It is admitted that the Complainant is a residential electric customer of Met-Ed at Account No. 100017738285. Complainant's allegation that the Company's name is difficult to identify in the Company's tariff is specifically denied.
3. For purposes of this Answer, the several sentences of the paragraph containing Complainant's allegations have been restated and answered as follows:¹

¹ Complainant's averments and allegations have been re-stated nearly verbatim in the same or similar fashion as they appear in the complaint as amended. Please note that because the averments and allegations as restated in this answer have been bolded for clarity purposes, any bolded text from the complaint as amended was, in turn, italicized to note the additional emphasis placed on these words and phrases in the complaint

- 1) The following is NOT meant to be derogatory; it is meant to remind this Commission of its allegiance. Incorrect: Public Utility Commission. Correct: Public Utility Commission. Thus far, after maintaining six years in Pennsylvania, I have NOT found the above followed!

Denied. The above statements do not contain any averments of fact or allegations of a violation of any law, regulation, or tariff by Met-Ed to which a response is required.

- 2) The Commission is also reminded that the PUBLIC is not an "attorney" NOT SHOULD THE PUBLIC HAVE TO BE AN ATTORNEY!!!!!!!!!!!!!! Therefore, if this is NOT the so-called "format" for this MOTION, bluntly So What!!!

Reminder:
 To Both Met-Ed
 + Commission
 "Public" should NOT
 be expected to know
 your "Language"!!
 as the "Public" does NOT expect you to know this!

TYPO - Should be (obviously) "NDA"

for the expectation of the Public" as Obvious Reminder

Denied. The above statements do not contain any averments of fact or allegations of a violation of any law, regulation, or tariff by Met-Ed to which a response is required.

- 3) I sent my Met-Ed complaint to the "PUC" over a month before it was "acted upon" and submitted to Met-Ed; who [when I called to see if my complaint had been received], I was told, Met-Ed had 20 days after receiving to "respond."

Admitted in part and denied in part. Pursuant to the Commission's regulations, Met-Ed had 20 days from the date of service to file an answer to the complaint filed with the Commission at the above docket. It is specifically denied that Complainant sent his complaint to the PUC "over a month" before it was served upon Met-Ed. Complainant filed his complaint with the Commission at the above docket on or around July 21, 2003, while the complaint was served upon Met-Ed on or around August 11, 2003.

should have been served submissions earlier!
 makes me feel
 respect in
 relationships

My thought: IF complainant does NOT "follow through", PUC can ignore!
 Thus: Met Ed is "off-the-hook" again!

4) However, I have been informed I have but 10 days to respond to Met-ED "motion."

10 Days Public
20 Days Utility
BIAS!!!
unfair advantage

Admitted. Pursuant to the Commission's regulations and as per the Motion Judge Assignment Notice dated September 8, 2003, Complainant was informed that he had 10 days from the date of service of the motion to file a response.

5) Somehow, (to me) there seems to be a BIAS here! Met-Ed has a bevy of attorneys available --- The PUBLIC is "by themselves." This (to me) adds to this Bias.

Ryan, Russell, Gidon, Seltzer
4 + 4 = 8
"Public" =
/

Denied. It is specifically denied that Met-Ed has a "bevy" of attorneys available and that there is any "bias" here. Met-Ed has provided and continues to provide safe, adequate, and reasonable electric service to Complainant, consistent with Met-Ed's existing retail electric service tariff, ^{but who actually "writes" tariff?} the Pennsylvania Public Utility Code, and applicable regulations. Furthermore, counsel has represented and will continue to represent Met-Ed, consistent with the Public Utility Code, applicable regulations, and Rules of Professional Conduct. To the extent that the above statements contain any conclusions of law, no response is required. *without corroborating the terms of #5*

6) Met-Ed knows the PUBLIC cannot possibly obtain "tangible" evidence (so does the PUC) --- but this "tangible" evidence still appears to be needed!

"Electricity" is an INTANGIBLE entity!

Denied. The allegation that Met-Ed "knows" the "Public" cannot obtain "tangible" evidence is specifically denied. By way of further answer, Met-Ed is without information sufficient to form a belief as to the Commission's knowledge as represented in the above statement. To the extent that the above statements do not contain any averments of fact or allegations of a violation of any law, regulation, or tariff, no response is required. To the extent that the above statement contains any conclusions of law, no response is required.

LAW is supposed to
be a forum of
Common Sense
& Justice!

7) PUC is supposed to invoke "common sense!" especially
with such "tangible" status, The PUC HEARING is
NOT a COURT-OF-LAW. The PUC is supposed to be
a "forum" for "the public," and dispense JUSTICE!

To the extent that the above statements do not contain any
averments of fact or allegations of a violation of any law, regulation, or tariff by Met-Ed,
no response is required. To the extent that the above statements contain any conclusions
of law, no response is required.

8) ALSO: When reading the Met-Ed "tariffs," it is
extremely difficult to understand just WHO the electric
company is! Within the "tariff," so many DIFFERENT
companies are referenced!

Denied. Upon review and inspection of the relevant Met-Ed
tariffs, the Company's name is clearly marked in the upper left hand corner of each page
of its electric retail service tariff. *My statement did NOT reference "corner page markings"
it "referenced" CONTENT! by the wording "When Reading"*

9) In addition: IF read carefully, there are
CONTRADICTIONS throughout!

Denied. Met-Ed's Pennsylvania tariffs were prepared, filed,
approved, and implemented in accordance with the Public Utility Code, the
Commission's regulations, and applicable law.

10) If read carefully, it is very obvious that the electric
company wrote the tariffs to self-servingly benefit,
advantage and profit themselves. WHY IS IT THAT
THE PUC is allowing this to occur???? *STILL not answered by PUC*

Denied. Met-Ed's Pennsylvania tariffs were prepared, filed,
approved, and implemented in accordance with the Public Utility Code, the
Commission's regulations, and applicable law. To the extent that any of the above
statements do not contain any averments of fact or allegations of a violation of any law,
regulation, or tariff, no response is required.

*Self serving
Rhetoric!*

- 11) Why doesn't the PUBLIC service commission HIRE competent, electrically-savvy people? It does not take a "rocket scientist" to see the "self-serving biases" throughout these "tariffs."

Denied. Met-Ed's Pennsylvania tariffs were prepared, filed,

What else is the "involved" permitted to write their own
approved, and implemented in accordance with the Public Utility Code, the Commission's regulations, and applicable law. *by the UTILITY!* To the extent that any of the above statements do not contain any averments of fact or allegations of a violation of any law, regulation, or tariff, no response is required. To the extent that the above statement contains any conclusions of law, no response is required.

- 12) It also does NOT take an economics professional to unmask "extortion" matrices especially when the "fee" increases by the addition of an additional DIGIT! Though my USAGE has NOT INCREASED in any way, my bill has increased: HOW? With the addition of a "1" in front of what had been my total previous bill!!!

Denied. Met-Ed specifically denies that Complainant's bills are

inconsistent with his electricity usage. By way of further answer, the bills for electric

service at Met-Ed Account No. 100017738285 are accurate. On April 7, 2003, the

Commission's BCS issued a decision at No. 1331170 dismissing an informal complaint

filed against Met-Ed by Mr. O'Toole alleging excessive billing. In its decision, BCS

concluded that Complainant's meter tested accurately within Commission accuracy

guidelines, which indicated that service was registering correctly on the meter. To the

extent that any of the above statements do not contain any averments of fact or

allegations of a violation of any law, regulation, or tariff, no response is required.

Does NOT reference ↑ Does reference "Occurrence(s)"!

*based on a preposterous "supposition"!
because someone own 100 vehicles does NOT mean he drives all at any one time!*

Met-Ed CONTROLS what occurs at 201

at that time!

*I own Farm Equipment
but don't use it in snow*

*I own Snow Blowers
but don't use them to "Farm"*

*I own "Trailers"
but don't drive around town
with the trailers attached!*

- Service Wires are so old = dangerous sag
 - Transformers: So Old, Fuses are not capable of Service Trans 13)
 - Amperage 200
 - Working Fuses: now all but require minimum 600 amp Service

AND: my "service" has actually "deteriorated" instead of modernized. ← No mention by Met-Ed of this fact!

Denied. Met-Ed has provided and continues to provide safe, adequate, and reasonable electric service to Complainant, consistent with Met-Ed's existing retail service tariff, the Pennsylvania Public Utility Code, and applicable regulations. *Self-Serving Rhetoric!*

14) The power-supply wires from the "road" to my meter are sooo old they sag so badly the farm combine barely can pass under them; These power lines are probably so "weather-corroded, conductivity is "hindered,"

Denied. Upon reasonable inspection by two Met-Ed engineers on or about October 15, 2003, the referenced electric wires were found to be safe and have adequate clearance from the ground. The wires do not cross the driveway, and there is sufficient access to the farm fields. *but did NOT know what a combine was - let alone its height!*
but does cross farm land (Not mentioned)
 By way of further answer, Met-Ed has provided and continues to provide safe, adequate, and reasonable electric service to Complainant, consistent with Met-Ed's existing retail service tariff, the Pennsylvania Public Utility Code, and applicable regulations. *Self-Serving Rhetoric!*

These same 2 engineers admitted to me on site of eye of wires, and of excessive sag!

15) The TRANSFORMER is of a 1940's vintage. The transformer supplying my property is grossly under-powered; being 10 or 15 KW. It should have been at least a 25 KW even in the 1970's - I have been told now 40+ KW.

Denies but admits but BOTH!

In the 1960s the average electric USE was LESS than 40% of what it is now!

Denied. The transformer servicing Complainant's property is a 10 kva manufactured in 1963. Upon inspection by two Met-Ed engineers on or about October 15, 2003, the condition of the transformer, pole, fuse, and grounding was found to be safe and adequate. *Still 40 Years Old!*
Where obtained their Engineer Degree? Because Met-Ed calls them Engineers, does NOT make it so!
 By way of further answer, Met-Ed has provided and continues to provide safe, adequate, and reasonable electric service to Complainant, consistent with

Where is the TANGIBLE evidence? (ibid) Good for Court Good for Grand

Rhetoric!

Met-Ed's existing retail service tariff, the Pennsylvania Public Utility Code, and applicable regulations.

*

Not Handled especially for a friend

16) Though "electrical usage" has geometrically increased since the 1940's, especially on FARMS, my "service" has NOT been upgraded. Why NOT???

More than TRIP since 1960's

Denied. Met-Ed has provided and continues to provide safe, adequate, and reasonable electric service to Complainant, consistent with Met-Ed's existing retail service tariff, the Pennsylvania Public Utility Code, and applicable regulations. Moreover, Complainant has refused to comply with the Company's Commission-approved tariff provisions regarding the steps that a customer is required to take to obtain a service upgrade. To the extent that the above does not contain any averments of fact or allegations of violations of any law, regulation, or tariff, no response is required

at my cost - not my cost, is Met-Ed's to provide

?

17) Farms TODAY should be at least 600 amp. I have (a weak and uneven 200 amp!)

Denied. Met-Ed has provided and continues to provide safe, adequate, and reasonable electric service to Complainant, consistent with Met-Ed's existing retail service tariff, the Pennsylvania Public Utility Code, and applicable regulations. Also, Met-Ed is without information or knowledge sufficient to form a belief as to the truth of the statements about electricity required for "farms today."

Why Not?

I want to be with the PUC when the surprise testimony is filed by PUC. I should be notified of such as well!

18) When the transformer fuse "blew," the truck does not even have it on-board. Fortunately, there was one left at the "shop."

Denied. Met-Ed is without information or knowledge sufficient to form a belief as to the truth of the above allegations and demands proof thereof, if relevant, at hearing. Met-Ed further answers that the transformer servicing

Complainant's property uses the same fuses as the transformers that are currently installed by the Company.

Not Handley!!! PUC should DEMAND ON-SITE DOCUMENTATIONS



19) I am "responsible" for "cabling" from the meter in. *only!* Met-Ed wants me to pay from the road in and for the cost of the trench.

Admitted. On or about September 17, 2002, Complainant requested a service upgrade to 600 amps. At the time of the request, Met-Ed's tariff required a customer requesting service for more than 400 amps to install his own underground service cable. Complainant refused ^{← To Pay} to upgrade his service equipment,

refused to supply and install the cable, and refused to open a trench. *because it is Met-Ed's "cost" to provide "adequate"*

*Medical!
Such service is required
to be supplied
by Mt. Liberty!*

20) I am supposed to be in a "whirlpool" at least TWICE daily. I CAN'T DO THIS BECAUSE I don't have the "power." I have told Met-Ed of this Medical Need MANY TIME, but it has been IGNORED! Met-Ed is required to provide the POWER. They've told me I have to.

Denied. Met-Ed has provided and continues to provide safe, adequate, and reasonable electric service to Complainant, consistent with Met-Ed's existing retail service tariff, the Pennsylvania Public Utility Code, and applicable regulations. Met-Ed is without information or knowledge sufficient to form a belief as to Complainant's medical needs and demands proof thereof, if relevant, at hearing. To the extent that the above statements contain any conclusions of law, no response is required.

*Rhetoric -
Not "proof"*

*Documentation
was shown
but Met-Ed ignored!*

21) If I want to use the required-for-my-health whirlpool, I have to "travel," which is "hurtful."

Denied. Met-Ed is without information or knowledge sufficient to form a belief as to the truth of the matters asserted in this averment and demands proof thereof, if relevant, at hearing.

Met-Ed Lie!

*They were shown Whirlpool
& that it is NOT on ready
for immediate USE!*

22) PUC do your duty!

The above statement does not contain any averment of fact or allegation of a violation of any law, regulation, or tariff by Met-Ed to which a response is required.

23) Because of the lack of power, I cannot use some of the farm equipment I should be using. This presents quite a problem! I don't use the equipment as I don't have the "power" BUT Met-Ed states as I am not using the equipment, I don't need the power; This is a "catch 22" but Met-Ed is the catch.

Whirlpool alone REQUIRES 50 Amp

Denied. Met-Ed specifically denies that it is providing insufficient power to Complainant's property. Met-Ed has provided and continues to provide safe, adequate, and reasonable electric service to Complainant, consistent with Met-Ed's existing retail service tariff, the Pennsylvania Public Utility Code, and applicable regulations. Met-Ed is without information or knowledge sufficient to form a belief as to the truth of the statements regarding Complainant's use of the farm equipment and demands proof thereof, if relevant, at hearing. To the extent that the above statements do not contain any averments of fact or allegations of a violation of any law, regulation, or tariff, no response is required.

Rhetoric!
Why Not?

How can Met-Ed deny? They were shown on the 1st visit, all panels + wiring or use usable equipment (Equipment Good Power supply Good) 24)

24) I have much of MY wiring for the equipment IN! Can't use it because POWER NOT there. I even have the additional "panel" but can't activate this panel. POWER not there.

Denied. Met-Ed specifically denies that it is providing insufficient power to Complainant's property. Met-Ed has provided and continues to provide safe, adequate, and reasonable electric service to Complainant, consistent with Met-Ed's existing retail service tariff, the Pennsylvania Public Utility Code, and applicable

Fraudulent Rhetoric because saw the stated situation!

regulations. Any electrical problems that Complainant is experiencing are due most likely due to faulty inside wiring and equipment.

*Not Handy!
Light switches ON by themselves
Generators don't go up by themselves
Circuit breaker doesn't fluctuate by itself!
or flicker bright!*

25) Have NUMEROUS power fluctuations! Met-Ed says "prove it." I want the PUC to tell me HOW!

Denied. After reasonable investigation, Met-Ed has been unable to confirm that Complainant is experiencing any voltage irregularities. Met-Ed has provided and continues to provide safe, adequate, and reasonable electric service to Complainant, consistent with Met-Ed's existing retail service tariff, the Pennsylvania Public Utility Code, and applicable regulations. To the extent that the above statements do not contain any averments of fact or allegations of a violation of any law, regulation, or tariff, no response is required.

*Met-Ed CONTROLS this (to a degree)
+ can totally control when they show or come*

*Rhetoric
No Proof!*

26) Have had much of my equipment and appliances "fail" due to these fluctuation[s]. These fluctuations have even PASSED THROUGH UPS units and destroyed them. I have (had) eleven "Uninterruptible Power Sources" - of which now only 3 work maybe. Each unit cost: \$1,800-2,200. Their demise: Continued Power Problems.

*How else would electrical equipment have been damaged from the source?
Tangibly prove this did NOT happen!*

Denied. After reasonable investigation, Met-Ed has been unable to substantiate that Complainant is experiencing any voltage irregularities and specifically

something, can't prove

denies that power provided by Met-Ed has caused any damage to Complainant's property. Met-Ed has provided and continues to provide safe, adequate, and reasonable electric service to Complainant, consistent with Met-Ed's existing retail service tariff, the Pennsylvania Public Utility Code, and applicable regulations.

*Again
Rhetoric
Intangible Rhetoric!*

27) Lights continuously "blink" or change brilliance. Many of my fluorescent lights have FAILED because of the Fluctuations. TVs continuously "show frames" around the picture. VCRs continuously lose their programmed recording time. Computers lose their data, sometimes even the "saved" data; even crash. Met-Ed wants tangible proof. HOW? I have had to have them "serviced" and reprogrammed too-numerous-times-to-count.

How can Met-Ed "deny" these occurrences? Do they have 2 "cameras" watching? If they did, it would malfunction!

Denied. Met-Ed is without information or knowledge sufficient to form a belief as to the truth of the matters asserted in these averments and demands proof thereof, if relevant, at hearing. To the extent that the above statements do not contain any averments of fact or allegations of a violation of any law, regulation, or tariff, no response is required.

They were shown this came to Met-Ed had NO ANSWERS for the (the defect) demonstrated.

28) Security system – with its cameras – have fouled up and required "repair," should not occur. TV channel amplifiers, which are usually non-destructible [except by current problems] have frequently had to be recalibrated or replaced. Garage doors go up by themselves and "remote-controlled" lights go ON by themselves.

To Met-Ed "visitors" Camera defect shown Amplifier shown "Burr" shown

Denied. Met-Ed is without information or knowledge sufficient to form a belief as to the truth of the matters asserted in these allegations and demands proof thereof, if relevant, at hearing.

I agree Met-Ed has 2 cameras NO "Common Sense"!

29) These are only a few of the electrical [power] problems I experienced. There is NO WAY all of these things should happen by "normal" happenings = Common Sense!

Shown to Met-Ed group on their visit!

Denied. Met-Ed is without information or knowledge sufficient to form a belief as to the extent of the electrical problems that Complainant allegedly has experienced and demands proof thereof, if relevant, at hearing. By way of further answer, Met-Ed has provided and continues to provide safe, adequate, and reasonable

electric service to Complainant, consistent with Met-Ed's existing retail service tariff, the Pennsylvania Public Utility Code, and applicable regulations. To the extent that the above statements do not contain any averments of fact or allegations of a violation of any law, regulation, or tariff, no response is required.

**
How does one
ask a question
DENY?*

30) PUC: Tell me how I can "TANGIBLY" "prove" this!!!! Met-Ed KNOWS and USES THIS and the PUC co-conspires!!!

Denied. Met-Ed is without any independent knowledge or information as to the occurrence and/or cause of the electrical problems that Complainant allegedly has experienced. By way of further answer, Met-Ed has provided and continues to provide safe, adequate, and reasonable electric service to Complainant, consistent with Met-Ed's existing retail service tariff, the Pennsylvania Public Utility Code, and applicable regulations. To the extent that above statements do not contain any averments of fact or allegations of a violation of any law, regulation, or tariff by Met-Ed, a response is not required. To the extent that the above statement contains any conclusions of law, no response is required.

31) Just recently, I spoke with Steven D. Ward [Met-Ed Chief Engineer] concerning a recent occurrence:

Admitted in part and denied in part. Mr. Ward's actual title is supervisor of regional engineering for Met-Ed. It is specifically admitted that Mr. Ward conducted at least two extensive conversations with Complainant about his electric service, and in particular, about complaints of voltage irregularities and inadequate service. Mr. Ward advised Complainant of what steps to follow if any future voltage irregularities were to occur as there were none at the time of the call. Mr. Ward also

exact
*Irregular occurrences had occurred at that time period
Just not at that minute (I also said I believed Met-Ed
made sure none was happening
during the call !)*

advised Complainant of the requirements, processes, and procedures that were in place

for a service upgrade.

Not when "upgrade" was needed to service properly!

- 32) The [15 amp] circuit breaker on which I have a microwave "plugged" suddenly "popped." (I was standing near it and heard a low "snap" just before the "pop") It "popped" every time a reset. Breaker itself probably now "damaged." I moved the microwave; it now had a strange sound, but did not "pop" the breaker. I tried the microwave at FOUR DIFFERENT breaker outlets, No Pop!

Denied. Met-Ed is without information or knowledge sufficient to form a belief as to the truth of the matters asserted in these statements and demands proof thereof, if relevant, at hearing.

BUT is permitted by PUC their "Rhetoric". WHY?

X

- 34) I then [using a meter] checked the house current: The VOLTAGE at several outlets read 88.8 volts for [after several cycles seen] about 12-15 seconds, then jumped to 120+ volts, the plus was a fluctuation between 120.2 and 120.4 volts. After about 30-45 seconds, back to 88.8 volts for 10-15 seconds. This fluctuation continued for almost an HOUR.

*1. How can I "prove"
But PUC "believes"
"verbal" from Met-Ed
Why?*

Denied. Met-Ed is without information or knowledge sufficient to form a belief as to the truth of the matters asserted in these statements and demands proof thereof, if relevant, at hearing.

Definitely "Relevant"!

X

- 35) ALSO: my garage doors keep opening and my remote lights keep going on. When I walked outside, I heard a low frequency, intermittent hum, but I did not see a "definite sparkling" but thought I could see an intermittent faint "glow" with the hum.

Denied. Met-Ed is without information or knowledge sufficient to form a belief as to the truth of the matter asserted in this statement and demands proof thereof, if relevant, at hearing.

*My "eyes" are liars! (I actually SEE these happenings)
Met-Ed "statement" is "Gospel"?
How So?*

X

36) However, the next day, I saw something else. The tree that is growing at the position that the electric pole "support" (and a "ground wire") enters the ground, THE LEAVES ON THIS TREE WERE SHRIVELED and Dying!!!! This tree was over grown with leave, so much so the wire was hidden; now, the leaves are gone and the wire is very visible - the tree looks like leafless winter!

"on or about"?

Denied. Upon reasonable inspection by two Met-Ed engineers on or about October 15, 2003, the condition of the transformer, pole, fuse, and grounding was found to be safe and adequate. Furthermore, the Met-Ed engineers saw no indication

No Such Persons Come Out!

My "Security" camera showed No Intrusion

How Dull! that the Company's facilities have in any way damaged the tree referenced in the above statements.

I called SEVERAL TIMES & was told "No one available to come." I also told them I wanted to be present when, if, someone came!

37) I have attempted to contact Steven D. Ward several times since - and even left messages; but have NOT received any return calls or messages.

HE was supposed to call about this "tree" condition!

Denied. It is specifically denied that Mr. Ward did not return

Complainant's phone calls regarding his electric service. Mr. Ward recently placed a telephone call in response to a message left by Complainant. During this telephone call that lasted nearly an hour, Mr. Ward advised that the "breaker trips" about which Mr. O'Toole complained were evidence of an internal wiring and/or equipment problem.

Not True I'm not stupid!

I answered this above!

38) There is definitely something wrong with the transformer servicing my home! It is ONLY 10-15 kw (200 amp). FAR TOO SMALL for any "farm" or my need!

Denied. Upon inspection by two Met-Ed engineers, the condition of the transformer, pole, fuse, and grounding is adequate, and the transformer is working properly. By way of further answer, Met-Ed has provided and continues to provide safe, adequate, and reasonable electric service to Complainant, consistent with Met-Ed's

Rhetoric! Not Legal Fact

existing retail service tariff, the Pennsylvania Public Utility Code, and applicable regulations.

39) PHASE TWO: My Bills Are Way Out Of Line!!!!!!!

Denied. Met-Ed specifically denies that Complainant's bills are "way out of line." By way of further answer, bills for electric service at Met-Ed Account No. 100017738285 are ^{Not} accurate. The Complainant's meter tested accurately within the Commission's accuracy guidelines, which indicates the service is registering correctly on the meter. *Controlled by Met-Ed! I have explained how!*

40) Upon purchasing this residence in Pennsylvania, I found several "flaws" with the electric service provided; and so notified the then-electric supplier - who promptly and laxly ignored me. Several of these "flaws" were: Supply lines that sagged to much; "Transformer" was far too old; Transformer too small for a "farm;" Supply wire to my meter showed [even then] extreme "aging."

Denied. Met-Ed specifically denies that the electric service provided to Complainant is "flawed" or that it has "ignored" Complainant. By way of further answer, Met-Ed has provided and continues to provide safe, adequate, and reasonable electric service to Complainant, consistent with Met-Ed's existing retail service tariff, the Pennsylvania Public Utility Code, and applicable regulations. Moreover, Met-Ed has had numerous contacts with Complainant concerning his electric service. *and "slobbered" with "rhetoric" + falsehoods*

*WHEN responded
Responded with
Rhetoric
and "Complainant
can't ignore"
However
Met-Ed has NOT
PROVEN their
contention!*

One falsehood:

*"Complainant has much electric equipment and the potential to use
Thus USED the electric."*

- 1. I have numerous vehicles on the property - but - that doesn't mean I drive them!*
- 2. I have 5 tractors - but - I don't use all of them (every day) Sometimes months of No Use!*
- 3. I have knowledge of 9 Languages but several I have not spoken for years!*

How come: No Bill Documents
 No mention of these past + present bills (41)
 Only Offer: Same old Answer!

My electric bills were between \$25 and \$35/ month (after I had moved my furnishings in). I have NOT changed or added anything "electrical" since OR used any more electricity since! BUT: [after a few years] my bills began to INCREASE - at the same time as the "subscriber" was permitted to "elect" their own "supplier." MY BILLS ARE NOW \$130-170/month! WHY?

Denied. Bills for electric service at Met-Ed Account No. 100017738285 are accurate. The Complainant's meter tested accurately within the Commission's accuracy guidelines, which indicates the service is registering correctly on the meter. To the extent that any of the above statements do not contain any averments of fact or allegations of a violation of any law, regulation, or tariff, no response is required. To the extent that any of the above statements do not contain averments of fact or allegations of a violation of any law, regulation, or tariff, no response is required.

42) My TOTAL ELECTRICAL USAGE HAS NOT INCREASED and consists of: ALL of the below work WELL on a non-designated 15 amp breaker:

Refrigerator	Side-by-side	51.5 kw/month
Refrigerator	Freezer Below	42.5 kw/month
Refrigerator	Freezer Below	47 kw/month
Refrigerator (compact)	No Freezer	15.4 kw/month
Freezer	Upright	54.1 kw/month
Dehumidifier	Cellar	intermittent running
Microwave	Standard	used MAYBE 5x @ 4min/wk
Copy Machine		used MAYBE 8 min/mo 11A
Security System	w. camera	2 amp/wk at max.
VCRs	[recorded tapes viewed elsewhere]	4/day for 3hr or less
TV	[though have 7, only watch ONE/time]	1/day for 2-3 hr MAYBE
Computer		2-4hr/1-3 days/week MAYBE
Ceiling off-set fluorescent [12 w] light		1-3hr/day MAYBE
Clocks	10	ALL but one battery operated
Air Compressor used MAYBE once/2/3 mo.		1 hp (14A) 2-3 min/use

How can Met-Ed DENY accounting of my appliances?

Denied. Bills for electric service at Met-Ed Account No.

100017738285 are accurate. The Complainant's meter tested accurately within the their "usage".
 The "usage" is ridiculous amounts!

Commission's accuracy guidelines, which indicates the service is registering correctly on the meter. With respect to averments regarding the individual appliances, Met-Ed is without information or knowledge sufficient to form a belief as to the truth of the matters asserted and demands proof thereof, if relevant, at hearing.

43) I have many other "electrical" appliances and equipment =but= are NOT "in use" and haven't been.

Refrigerators	X2	Washers	X2
Freezer	X1	Dryers	X2
Dehumidifiers	X2	TVs	X7

*4 is much needed
Wh. Appt!*

*Is impossible to deny
as Met-Ed (+ PUC Rep) was
shown these
at hearing.*

Denied. Met-Ed is without information or knowledge sufficient to form a belief as to the truth of the matters asserted and demands proof thereof, if relevant, at hearing.

Therefore this "DENIED" + reason is FRAUD!

44) TOOLS: Have NOT used since coming to Pa. - most are buried behind other stuff!

Table Saw Drill Press and many others

Can not deny as:

Denied. Met-Ed is without information or knowledge sufficient to form a belief as to the truth of the matters asserted and demands proof thereof, if relevant, at hearing.

*There were "in storage"
position, & so shown
(+ their condition proved)*

45) This is mentioned because a certain (female) "Met-Ed Representative" made this statement: Upon a "visit" by her to "examine" my "appliance usage," this ridiculous statement: "Because there is the 'potential,' then the electric MUST have been used!"

To both Met-Ed + PUC Rep.

*← This is in a WRITTEN Report!
Co-written by
Met-Ed + PUC Rep*

Denied. It is specifically denied that a "Met-Ed Representative" made the above statement to Complainant concerning potential versus actual electricity usage. The Commission's Bureau of Consumer Services (BCS) decision dismissing Complainant's informal complaint filed at No. 1331170 did specify that, in referencing

*When by telicon was questioned concerning this (written) statement Hung-Up on me.
(Copy of this statement was included with my document!)*

the numerous electrical appliances at the customer's property, the potential for the billed usage did exist.

Reference Page 15

How can this be Denied? (46)
When it can be easily seen
to be FACT!
This is tantamount to FRAUD!

* Because my house is located at the base of a hill and at the end of a "run" of other buildings, the "wind" GUSHES through into my house!

Denied. The above statement contains impertinent information. In any event, Met-Ed representatives do not recall whether Complainant's house is located

FRAUD!

(They have got to be kidding!)
A Hill, then
is or is NOT
present!
A Hill can NOT

"at the base of a hill" or "at the end of a "run" of other buildings." In terms of the

statement about the "wind," Met-Ed is without information or knowledge sufficient to form a belief as to the truth of the matter asserted and demands proof thereof, if relevant,

at hearing.

On one visit, Mr. Ward put on his coat because of the (chill) of the wind, as did some of his "guests"!

EXPLANATION OF USAGE OF THE ABOVE:

47) ALL OF THESE APPLIANCES WERE BROUGHT FROM MY PREVIOUS HOME of which, this whole farm house would fit in the living room and foyer of the previous house! This is why there are so many "duplicated" appliances and may had been used by our kids.

Denied. The above statements contain impertinent information statement is pertinent - explaining why so much equipment & why it is NOT NOW in use!

and Met-Ed is without information or knowledge sufficient to form a belief as to the truth of the matters asserted in the above statements and demands proof thereof, if relevant, at hearing.

Much of the equipment stored IN STACKS & was shown and saw these facts!

48) REFRIGERATORS: are rarely opened and when they are "open," are opened "slowly" and it is for a VERY short period of time [as I am the ONLY person here] and I am NOT here much, rarely during the day]. When I do arrive [between 11-1AM at night], I am more interested in "going to bed" than "sitting around!" I also usually "leave" between 10-11AM & eat out!

FREEZER: even more rarely opened! maybe once/week for 10 seconds.

DEHUMIDIFIER: is NOT running continuously – IS
“OFF” more than “ON”

MICROWAVE: the “usual” setting is to warm (a “Big
Mac,” etc.) at setting 1m23s@507.

COPY MACHINE: Last year, less than 350 copies
made. Only used if needed 10+ copies made; If only a
few, they are made “elsewhere” for me.

SECURITY SYSTEM: “camera” activated by a
“motion sensor”; all through a “transformer”

VCRs These are set for specific channels, and all
channels are usually NOT “recording” at the same time
– but may “overlap” on occasion.

TVs Were in use by “the family” (including “the
children”) at the other house!

CEILING off-set fluorescent [12 watt] LIGHT: First
and foremost: I like Fluorescent Lighting; it is NOT
“yellow!” Every room is so lighted; frequently by a
“Remote” [less expensive than “wiring”] [as old farm
houses did not have light switches at “convenient”
places {such as at the doorways}]. Second: The power
fluctuations [bright and dimming] (here) “burn out”
incandescent light bulbs. Third: I don’t need much
light, as I am rarely home – and when I am, my interest
is mostly “getting sleep.” also, if a fluorescent light is
place at the right position (side wall only inches from
white ceiling) a bright light is NOT NEEDED. the low
wattage will light the entire room. IF I do need brighter
light, I use a (15+15 watt) desk lamp – “on” when
needed, “off” when not. *My parents taught: “When you
leave a room, turn off the light!”*

CLOCKS With the frequent “momentaries,” electric
clocks don’t keep accurate time; With the frequent
“fluctuations” in current, electric clocks lose time. I use
one electric clock to “indicate” electric variances and
“outages.”

AIR COMPRESSOR: When I require "air" for (farm equipment), I "fill" the compressor tank, then turn the compressor OFF, I have surplus "air" in the tank for the equipment. The (4' upright) compressor tank "holds" the "pressure" for at least one month plus!

Denied. Met-Ed is without information or knowledge sufficient to form a belief as to the truth of the matters asserted in the above statements and demands proof thereof, if relevant, at hearing. *Proof is COMMON SENSE!*

49) As I have stated, MANY of these appliances were IN USE at the OTHER "BIG" FARM house, and are not only not in use here but not needed as: at the other farm. We, all FIVE OF US, lived but now, ONLY ONE lives here. The "children" have "moved-out" but took very little. They (a) did NOT move to a "farm." (b) didn't have room for much (c) wanted "new(er)" "stuff."

Where is the PROOF this is not true! Common Sense verifies because of numbers of the Appliances!

Denied. The above statements contain impertinent information and Met-Ed is without information or knowledge sufficient to form a belief as to the truth of the matters asserted in the above statements and demands proof thereof, if relevant, at hearing.

*RHETORIC
This does NOT answer my contention*

50) TOOLS: are MINE! If they want "tools," They get or lose their own! and did (even before moving).

How?

Denied. The above statements contain impertinent information

Is pertinent to document number of such equipment!

and Met-Ed is without information or knowledge sufficient to form a belief as to the truth of the matters asserted in the above statements and demands proof thereof, if relevant, at hearing.

Again impertinent Rhetoric!

51) PHASE THREE: MANY of my appliances have been "corrupted," "damaged" or burned by the quality of electric power being supplied to me. TVs have had their "circuit boards" burn; VCRs have had their "functions" totally breached or destroyed; Incandescent light bulbs have "flashed" and "burned-out" [even new bulbs - thus - I don't use "incandescents" now]

Where is the allegation?
"did not see such appliances"
because

Met-Ed DID see + KNEW I
could "produce" same!

Denied. It is specifically denied that the electric service provided to Complainant has been or is substandard or has caused any damage to Complainant's property. By way of further answer, Met-Ed has provided and continues to provide safe, adequate, and reasonable electric service to Complainant, consistent with Met-Ed's existing retail service tariff, the Pennsylvania Public Utility Code, and applicable regulations.

When I arrive after midnight
& leave early morning
Common Sense
Dictates
light was not on long!

52) [AND: as I arrive "home" VERY late, I don't have ANY lights on for even an hour;] [I do NOT leave a light ON when I am NOT in that room.]

Denied. Met-Ed is without information or knowledge sufficient to form a belief as to the truth of the matters asserted in the above statements and demands proof thereof, if relevant, at hearing.

53) The garage door goes UP without being "remote" triggered; Certain "remote controlled" lights go ON without being "remote" triggered. My "security alarm" has been "triggered" when no "invasion" was immanent - sometimes, I have been "on premises" home;

Denied. Met-Ed is without information or knowledge sufficient to form a belief as to the truth of the matters asserted in the above statements and demands proof thereof, if relevant, at hearing.

Fraudulent Contentions by Met-Ed!

On one visit by Met-Ed: The light went on twice } without human "Trigger"
The garage door did go UP }

+ I was asked about the noise of the garage door by Met-Ed Rep who saw the door still opening!

* saw the light "off"

Then "On" upon reentering room (I was with Met-Ed Rep - so - I could not "Trigger")

- 54) VCR pre-programmed programs have been "terminated" prior to the programmed time (in the middle of a recording session) (more than one VCR and all at the same "timing");

Denied. Met-Ed is without information or knowledge sufficient to form a belief as to the truth of the matters asserted in the above statements and demands proof thereof, if relevant, at hearing.

Met-Ed was Told
&
Shown ONCE!
& subsequently REFUSED
to "view" computers!

- 55) I have been working on the computer when, all of the sudden, the computer "locks up" or "loses the material and will NOT allow recover (it's GONE!!!) or it turns itself off. Not only is the "work" LOST but must be recomposed. Sometimes, the computer has to be taken for "re-programming"!!!

Denied. Met-Ed is without information or knowledge sufficient to form a belief as to the truth of the matters asserted in the above statements and demands proof thereof, if relevant, at hearing.

Not as
written
by me!

- 56) *This does NOT make for a HAPPY CAMPER!!! This definitely does NOT make for a HAPPY CAMPER!!!*

Denied. The above statements do not contain any averments of fact or allegations of a violation of any law, regulation, or tariff by Met-Ed, to which a response is required.

- 57) The fluorescent light(s) dim or brighten or "blips" [which really requires quite an electrical change] and the TV picture develops a THIN non-picture area around the edge or the picture "over-fills" and is slightly "distorted" or "blips"

Denied. Met-Ed is without information or knowledge sufficient to form a belief as to the truth of the matters asserted in the above statements and demands proof thereof, if relevant, at hearing.

58) I have been told that this problem is caused by ME; but have NOT been told HOW? MAINLY because: there is no way that I can cause this!!!

Admitted in part and denied in part. After reasonable investigation, Met-Ed informed Complainant any electrical problems he was experiencing were due to internal wiring and equipment problems. To the extent that the above statements do not contain any averment of facts or allegations of a violation of any law, regulation, or tariff, no response is required.

How can I "control" power variance

No mention made concerning the actual fuse replacement!

59) At times, I can HEAR strange noises emanating from the transformer on the pole (45') from my house. To verify the antiquity of the "transformer" when the "transformer" blew, the repair truck did not have one and said did not carry those that old and hoped they had one "back at the shop!" Upon their return, stated, "This is the last one. Hope this one doesn't "blow!"

Denied. Upon inspection by two Met-Ed engineers on or about October 15, 2003, the condition of the transformer, pole, fuse, and grounding servicing Complainant's property was found to be safe and adequate. By way of further answer, Met-Ed has provided and continues to provide safe, adequate, and reasonable electric service to Complainant, consistent with Met-Ed's existing retail service tariff, the Pennsylvania Public Utility Code, and applicable regulations. Met-Ed is without information or knowledge sufficient to form a belief as to the truth of the above allegations regarding the antiquity of the transformer and fuse and demands proof thereof, if relevant, at hearing. Met-Ed further answers that the transformer servicing Complainant's property uses the same fuses as the transformers that are currently installed by the Company.

INTERNAL RECORDS would show this UNLESS Met-Ed deliberately destroyed these reports!

Show Me!

60) PHASE BACKGROUND: When I was in school, "grants" were NOT easily obtained. I worked at every job to get tuition! Because of this, I had to obtain a variety of tools and experience! In a lot of areas!

The above statements
VERIFIES
I have been instructed
in "electricity"

Denied. The above statements contain impertinent information and Met-Ed is without information or knowledge sufficient to form a belief as to the truth of the matters asserted in the above statements and demands proof thereof, if relevant, at hearing.

I documented this
fact to Mr. Wood
with "knowledge"
HE did not even know!

The above statement
is an avowal of fact.

61) Unfortunately for Met-Ed, they seem to have the opinion that I am "mentally challenged" electrically.

Denied. The above statement is neither an avowal of fact or allegation of a violation of any law, regulation, or tariff. Therefore, no response is required.

62) Met-Ed also seems to think that because they say someone was at my home, they were. Camera.

How?

Denied. The above statement is vague and ambiguous and is

neither an avowal of fact nor allegation of a violation of any law, regulation, or tariff. Therefore, no response is required.

Common Sense
of
Several other people
(I have stated this to)
Knew EXACTLY
"What" & "How"!

I didn't say "When"!
I said "Why"!

63) Met-Ed has also told me that an "estimated bill" had to be issued as the meter reader could not get inside to read the meter. My meter is OUTSIDE!

Admitted in part and denied in part. Complainant's meter was last estimated on or around December 12, 2002. Complainant's meter was last read on

October 9, 2003, and is read on a monthly basis.

Where is the "Record" as documentation
that my bill had to be "estimated"

"Reader" does not (still)
get out of vehicle.

Why?

(I know Why! Have them tell you [pac], & this is why much inaccuracy!

64) Error also occur as frequently, the meter is read with the use of BINOCULARS from the truck.

Denied. The Complainant's meter tested accurately within the Commission's accuracy guidelines, which indicates the service is registering correctly on the meter.

How does this reference the "Reading". Rhetoric

65) This era of my life's experience is better explained and verified PERSONNALLY at the hearing!

The above statement is not an averment of fact or allegation of a violation of any law, regulation, or tariff to which a response is required.

*carelessly reading the statement!
(apparently common practice)
uses "Rhetoric!"
as excuse for not answering "Reading!"*

66) Met-Ed wants my electrical problems to be BURIED, so the PUBLIC does NOT realize that this electric supplier is "gouging" the PUBLIC, and Met-Ed is attempting to use you to help them!

Denied. It is specifically denied that Met-Ed wants any electrical problems that Complainant may be experiencing "to be buried." It is further denied that Met-Ed, an electric distribution company, is "gouging" the public. Met-Ed offers electric service in accordance with the rates, terms, and condition set forth in its tariff and in accordance with the Public Utility Code, the Commission's regulations, and applicable law. To the extent that above statements do not contain any averments of fact or allegations of a violation of any law, regulation, or tariff by Met-Ed, no response is required. To the extent that the above statement contains any conclusions of law, no response is required.

This rhetoric does NOT explicitly respond to statement 66

Not So!

4. These sentences in paragraph 4 of the original complaint and on the first page of the complaint as amended represent prayers for relief to which no response is required. To the extent that these sentences contain any factual averments, the truth of the matters asserted therein is denied.

Met-Ed wouldn't KNOW "Truth" if it "bit them"! They depend on Rhetoric + This of the PUC!

NEW MATTER

5. Paragraphs 1-4 of this Answer are hereby incorporated by reference as if set forth fully herein.

6. Upon review, the above complaint contains three primary allegations: (1) poor service quality as Complainant alleges the line at his residence is sagging, his transformer is too old, and he experiences excessive power fluctuations; (2) excessive billing as Complainant alleges he is being billed for more electricity than he uses; and (3) Met-Ed's tariff is difficult to understand.

7. On April 7, 2003, the Commission's BCS issued a decision at No. 1331170 dismissing an informal complaint filed against Met-Ed by Mr. O'Toole alleging excessive billing. In its decision, BCS concluded that Complainant's meter tested accurately within Commission accuracy guidelines, which indicated that service was registering correctly on the meter. Moreover, a BCS investigator, ^{who appeared to be ignorant} conducted a site visit and noted that the numerous electrical appliances on Complainant's property indicated that the potential exists for the billed usage. *Reference Page 15*

concerning electricity + the difference between USE + POTENTIAL!

8. In terms of service adequacy, Met-Ed has provided and continues to provide safe, adequate, and reasonable electric service to Complainant, consistent with Met-Ed's existing retail service tariff, the Pennsylvania Public Utility Code, and applicable regulations.

BUT NOT in accordance with the current electrical "needs" & of those of today's FARM! of which Met-Ed is REQUIRED To Provide!

40 years old!
Applicances of
5 years are
considered
Too old
!

9. The transformer servicing Complainant's property is a 10 kva manufactured in 1963 and is the same type of transformer used throughout Met-Ed's

NOT sufficient for even today's Home!

service territory. Upon inspection Met-Ed engineers Steven Ward and James T. Talley occurring on or about October 15, 2003, the condition of the transformer, pole, fuse, and grounding was found to be safe and adequate, and the transformer was functioning properly.

Not so! check wires in New developments Met-Ed is attempting to excess poor service techniques! Research!

PROVE THIS TO ME (I'm NOT stupid!)

10. On or about January 31, 2001 to around February 13, 2001, the

Company installed a voltmeter to record Complainant's voltage, which was recorded as normal.

4 insured current flow would NOT fluctuate during this period!

11. Upon reasonable inspection by the two Met-Ed engineers on or

Show "Documentation" of Engineer Degree!

about October 15, 2003, the relevant electric wires were found to be adequate, and have adequate clearance from the ground. The wires do not cross the driveway, and there is sufficient access to the farm fields.

There is lot to be explained!

but NOT for us = FARM!

but NOT Farming these fields

12. Any problems that Complainant is experiencing with his electricity

are most likely due to faulty internal wiring and equipment and are not the result of inadequate service delivered by Met-Ed.

← Met-Ed

← Due to "faulty" electrical supply at which time the equipment "fails" but continues to function

NOT MY COST from before meter!

13. In fact, Complainant has refused to comply with the Company's

This insufficient supply is in Met-Ed's contract - NOT mine!

Commission-approved tariff provisions regarding service upgrades. On or about

September 17, 2002, Complainant requested a service upgrade to 600 amps. At the time

of the request, Complainant was informed that Met-Ed's tariff required a customer

requesting service for more than 400 amps to install his own underground service cable.

This "Requirement" is "goughing" on the Public!

However, Complainant refused to upgrade his service equipment, refused to supply and

install the cable, and refused to open a trench.

I don't own or have the authority to allow such off-property work!

Also: PUC should employ competent people who are knowledgeable concerning current electrical needs AND require the utility to comply (through the tariffs) with up-to-date electrical needs!

BUT NOT MODERN

14. Met-Ed asserts that its electric retail service tariff is lawful in all respects. Met-Ed's tariff was prepared, filed, approved, and implemented in accordance with the Public Utility Code, the Commission's regulations, and applicable law.

by the UTILITY!
NOT, as should be, by PUC!



15. At all times relevant to this Complaint, Met-Ed acted ^{UN}reasonably and in accordance with its existing retail tariff, the Pennsylvania Public Utility Code and the Commission's regulations.

outdated

WHEREFORE, Metropolitan Edison Company hereby requests that the Complaint of Edward T. O'Toole be dismissed with prejudice.

No Way!

Respectfully submitted,

Dated: October 27, 2003

Matthew A. Totino
Matthew A. Totino
RYAN, RUSSELL, OGDEN & SELTZER LLP
800 North Third Street, Suite 101
Harrisburg, Pennsylvania 17102-2025
(717) 236-7714

Attorneys for
Metropolitan Edison Company

I am entitled to and have the constitutional RIGHT TO my "day in court"

"Big Business" has "Ripped Off" The People Long Enough!

COMMONWEALTH OF PENNSYLVANIA
PENNSYLVANIA PUBLIC UTILITY COMMISSION
Office of Administrative Law Judge
P.O. BOX 3265, HARRISBURG, PA 17105-3265
August 11, 2004

IN REPLY PLEASE
REFER TO OUR FILE

In Re: C-20030854

(SEE ATTACHED LIST)

Edward T. O'Toole v. Metropolitan Edison Company
Billing / Tariff Dispute

Hearing Notice

This is to inform you that a hearing on the above-captioned case will be held as follows:

Type: Initial Hearing
Date: Tuesday, September 28, 2004
Time: 1:30 p.m.
Location: Hearing Room 3
Plaza Level
Commonwealth Keystone Building
400 North Street
Harrisburg, Pennsylvania
Presiding: Administrative Law Judge Angela T. Jones
P.O. Box 3265
Harrisburg, PA 17105-3265
Telephone: (717) 783-5452
Fax: (717) 787-0481

DOCKETED
AUG 16 2004

**DOCUMENT
FOLDER**

RJP

Attention: You may lose the case if you do not come to this hearing and present facts on the issues raised.

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. All others (corporation, partnership, association, trust or governmental agency or subdivision) must be represented by an attorney. An attorney representing you should file a Notice of Appearance before the scheduled hearing date.

If you are a person with a disability, and you wish to attend the hearing, we may be able to make arrangements for your special needs. Please call the scheduling office at the Public Utility Commission:

- Scheduling Office: (717) 787-1399.
- AT&T Relay Service number for persons who are deaf or hearing-impaired: 1-800-654-5988.

pc: Judge Jones
Cherie Pyle
Beth Plantz
Docket Section
Calendar File

7⁰⁰ SEP 21 AM 9:26

SECRETARY'S BUREAU

Edward T. O'Toole
13152 Rennoll Road
Glen Rock, Pennsylvania
17327
717 235 9366
September 13, 2004

Administrative Law Judge Angela T. Jones
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor
Harrisburg, Pennsylvania 17120

ORIGINAL

DOCKETED
SEP 27 2004

re: Edward T. O'Toole vs Metropolitan Edison Company
Docket No.: C-20030854

DOCUMENT
FOLDER

Dear Judge Jones:

I have no objection to the request by Metropolitan Edison Company [Met-Ed] for a rescheduling of the hearing, currently scheduled for Tuesday, September 28, 2004 at 1:30 P.M. before Your Honor in Hearing Room 3.

My "agreement" is primarily as **my request** for months [years] of **certain information** has been either ignored or frustratingly circumnavigated by Met-Ed. Without this data, I am unable to present a proper "argument" -and- Met-Ed is well aware of this fact. It is hereby requested that Your Honor "remind" Met-Ed that -not only for this hearing, but- as found in the "tariffs", Met-Ed is obliged to supply to its "subscriber", "data" in terms that the "subscriber" can understand.

I have proffered to Met-Ed that I don't expect Met-Ed to understand the "language" of my profession, why is it that Met-Ed [through its representatives, of all levels] expects that "the public" should totally understand the language [and "billing format"] of Met-Ed. I have endured insults and "hang-ups" because I vocalized non-understanding and asked for a "national grade (5) language" explication. I explained that, within their billing(s), the same wording was used at different locations; even to the numerical costs. why? Their response was either irrelevant, nebulous or demeaning (toward me).

Another proffered by Met-Ed [upon one "on-site" visit] by a person who [obviously] had no training or knowledge of electricity or electronics was (a) confusion when shown the breaker box^a and (b) because an appliance was present, it therefore **HAD TO BE IN USE^b**.

^a did NOT know how to "reset" a "popped" breaker

^b The UNplugged wire & NO outlet available did not matter ex.: a SPA that requires 50 amp circuit, had no wiring anywhere

Enclosed, is that felt needed for a proper presentation by me.
Feel free to contact me if there are any questions concerning any of these presented.

For months, even **years**, I have been requesting of Met-Ed & their predecessors, orally, by telephone, as well as written, for a "tabular" breakdown, with **full & complete** explanation of each "item"; IF anything at all is received, is copies of some previous billings, of which is the reason for the request for a "graph-format" – I can't understand the bill and I don't know the "repetitious" entries of which I am told are **not** "repetitious" – though the wording [& amount(s)] is the same. For-the-life-of-me, I canNOT understand WHY I am expected to "understand fully" Met-Ed's language! I don't and never have expected others, not of **my** profession, to "understand" **my** terminologies – that's why I ALWAYS explain; in a "lingo" that the non-medically-patient can understand.

I also need complete information as to the installation date(s) of:

- = "currently in use" pole-mounted supply lines, the date(s) repositioned [if at all];
- = "currently in use" transformer, with its "specs" and any "up-grades";
- = why, when the transformer "popped" its "fuse", the "truck" was not equipped to "immediately" replace the fuse;
- = Why, when a "dated" transformer is replaced, that "dated" transformer is "installed" elsewhere – usually at a "new development";
- = why, up-graded "supply" has not been provided, as specified in the "tariffs"; 200 amp service is so INSUFFICIENT for today's FARM needs;
- = why it took Met-Ed **months** to "replace" a "broken" meter *at my home* especially; when each month, that meter is "physically" observed;
- = why the "positive leg" DIFFERS in "supply" from the "negative leg";
- = why the "incoming voltage" differs as much as 10-25 volts during each day always on the HIGH side;
- = why house lights, etc. "can be predicted" as to when they will "flicker" or "brighten" "even fluorescent" even at 3:a.m.;
- & (electric) clocks frequently "run" FAST! & TV's: Picture alterations
- = why UPS {Uninterruptible Power Supply(s)} actually "click" & have "burned";
- = why, regularly, my computers **require** "servicing" {in Pa, but not in Md} fluorescent light "transformers" require frequently replacement;
- = Why, my PHONE LINE has a "higher than" 24v current w amperage increase.
- == CURRENT complete copy of Tariffs ==

UNTIL I receive the "data" requested, it is IMPOSSIBLE for me to "present" a proper, knowledgeable, competent, viable and complete "argument".

THIS IS WHAT [& HOW] Met-Ed has always used to triumph in the past!

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

EDWARD T. CTOOLE

vs

METROPOLITAN EDISON COMPANY

:
:
:
:
:
:

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the foregoing document upon the individuals listed below, in accordance with the requirements of 52 Pa. Code, 1.54 (relating to service by a participant).

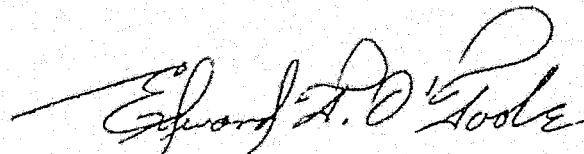
Service by First Class Mail, postage prepaid, addressed as follows:

Angela T. Jones
Administrative Law Judge
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
2nd Floor
400 North Street
Harrisburg, Pennsylvania 17120

James J. McNulty, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
2nd Floor
400 North Street
Harrisburg, Pennsylvania 17327

Law Offices: Ryan, Russell, Ogden & Seltzer LLP
Suite 101
800 North Third Street
Harrisburg, Pennsylvania 17102

Dated: September 13, 2004



Edward T. O'Toole
13152 Rennoll Road
Glen Rock, Pennsylvania
17327
717 235 9366

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

EDWARD T. O'TOOLE

v.

METROPOLITAN EDISON COMPANY

Docket No. C-20030854

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the Answer and New Matter of Metropolitan Edison Company upon the individuals listed below, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

No Such Documents Included!

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the foregoing document(s) of Metropolitan Edison Company upon the individuals listed below, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

Service by Hand Delivery, addressed as follows:

Angela T. Jones
Administrative Law Judge
Pennsylvania Public Utility Commission
Commonwealth Keystone Building,
2nd Floor
400 North Street
Harrisburg, PA 17120

James J. McNulty, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building,
2nd Floor
400 North Street
Harrisburg, PA 17120

Service by First Class Mail, postage prepaid, addressed as follows:

Edward T. O'Toole
13152 Rennoll Road
Glen Rock, PA 17327