

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

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PA PUC
SECRETARY'S BUREAU

ARTHUR LARSON
Complainant

DOCKET NO. C-2017-26152

v.

PECO ENERGY COMPANY

REPLY TO NEW MATTER

AND NOW comes Arthur Larson, complainant, and alleges as follows in reply:

1. Denied. The complaint of Arthur Larson speaks for itself and is incorporated herein by reference as if fully set forth.

2. Admitted in part and denied in part. Since the time of the alleged approval more technical information has become available and will be offered at time of trial.

3. Denied. All written documents speak for themselves. The conclusions contained in paragraph 3 are objected to as not being factual.

4. Denied. The text of the statute is incorporated herein by reference as if fully set forth.

5. Admitted in part and denied in part. Since the events which occurred more than eight years ago new technical information is available which proves beyond a doubt that the safety of the smart meter is in substantial doubt.

6. Denied. The order speaks for itself.

7-8. Admitted in part and denied in part. In the intervening eight years the

safety of the smart meter is now in substantial dispute.

9. Denied. The content of the order is incorporated herein by reference as if fully set forth. It is further averred that in their intervening seven years the safety of the smart meter is in substantial dispute.

10. Denied. The content of paragraph 10 is within the control of an adverse party and is therefore deemed denied.

11-13. Denied. These documents are not attached to the new matter nor are allegations of law required to be answered by reply.

14. Denied. No answer is required by law to the historical allegations. The alleged document is not attached to the new matter.

15. Denied. Strict proof is demanded at time of hearing. It is further alleged that consumer safety is paramount with years of experience having shown and challenged the safety of the smart meter.

16. Denied. The complaint is incorporated herein by reference as if fully set forth. The safety of the smart meter is properly challenged herein as a matter of public safety and constitutional rights.

17. Denied. The content of the complaint is incorporated herein by reference as if fully set forth.

18. Denied. The content of the complaint is incorporated herein by reference as if fully set forth.

19. Denied. The content of paragraph 19 contains a conclusion of law to which no response is required. It is further alleged that the entire opinion and order of

June 11, 2015 is not attached.

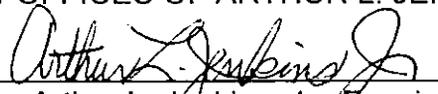
20. Denied. No answer is required to the conclusions of law.

21-23. Denied. No answer is required to the conclusions of law pleaded.

WHEREFORE, complainant respectfully requests that his complaint be honored and the relief requested be granted.

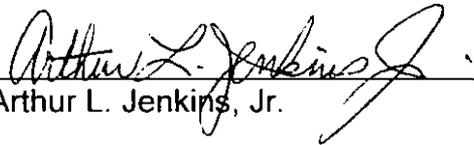
Respectfully submitted,

LAW OFFICES OF ARTHUR L. JENKINS, JR.

By:  _____
Arthur L. Jenkins, Jr., Esquire
Attorney for Arthur Larson

VERIFICATION

I verify that I am the attorney for Arthur Larson in the above matter; that the Verification of Arthur Larson cannot be obtained and time deadlines met; that I have sufficient information from Arthur Larson to make this Verification; and that the facts set forth in the foregoing Reply to New Matter are true and correct to the best of my knowledge or information and belief. I further understand that false statements therein are subject to the penalties of 18 Pa.C.S. §4904 relating to unsworn falsification to authorities.



Arthur L. Jenkins, Jr.

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PA PUBLIC UTILITY COMMISSION
SECRETARY

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

ARTHUR LARSON : DOCKET NO. C-2017-2615206
Complainant :
v. :
PECO ENERGY COMPANY :

CERTIFICATE OF SERVICE

I, Arthur L. Jenkins, Jr., hereby certify that I have this day served a copy of the Reply to New Matter in the above matter upon all interested parties by mailing a copy, properly addressed and postage prepaid to:

Shawane L. Lee, Esquire
Legal Department
PECO Energy Company
2301 Market Street, S23-1
Philadelphia, PA 19103

LAW OFFICES OF ARTHUR L. JENKINS, JR.

By: 
Arthur L. Jenkins, Jr., Esquire
Attorney for Arthur Larson

Dated: August 25, 2017

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