

Lauren M. Lepkoski, Esq.
(610) 921-6203
(330) 315-9263 (Fax)

610-929-3601

November 22, 2017

VIA ELECTRONIC FILING

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor
Harrisburg, PA 17120

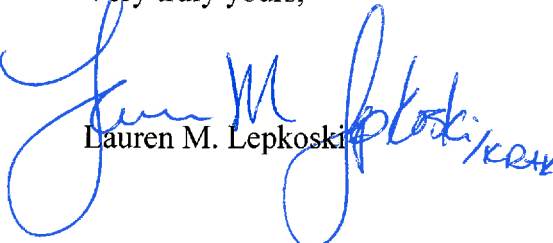
Re: Catherine Lamagna v. Pennsylvania Electric Company
Docket No. C-2017-2608014

Dear Secretary Chiavetta:

Enclosed please find the Motion to Compel of Pennsylvania Electric Company with regard to the above-captioned matter. This document has been served on the Complainant as shown in the Certificate of Service.

Please contact me if you have any questions regarding this matter.

Very truly yours,


Lauren M. Lepkoski

krak
Enclosures

c: As Per Certificate of Service

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

CATHERINE LAMAGNA

v.

PENNSYLVANIA ELECTRIC COMPANY

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Docket No. C-2017-2608014

NOTICE TO PLEAD

TO: Catherine Lamagna

Pursuant to 52 Pa. Code § 5.103(c), you are hereby notified that, if you do not file a written response denying or correcting the enclosed Motion to Compel of Pennsylvania Electric Company within **twenty (20) days** from the service of the Notice, the facts set forth by Pennsylvania Electric Company in the Motion may be deemed to be true, thereby requirement no other proof. All pleadings, such as a Reply to Motion, must be filed with the Secretary of the Pennsylvania Public Utility Commission, with a copy service to counsel for Pennsylvania Electric Company, and where applicable, the Administrative Law Judge presiding over the case.

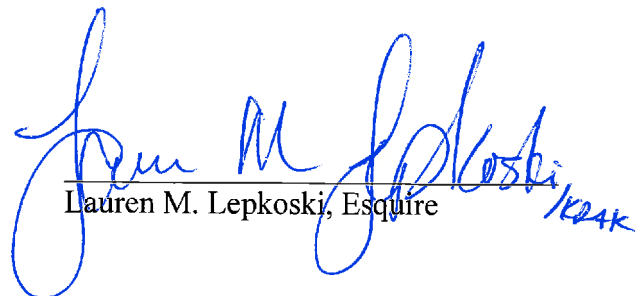
File with:

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
PO Box 3265
Harrisburg, PA 17105-3265

With a copy to:

Lauren M. Lepkoski
Tori L. Giesler
FirstEnergy Service Company
2800 Pottsville Pike
P.O. Box 16001
Reading, Pennsylvania 19612-6001

Date: November 22, 2017


Lauren M. Lepkoski, Esquire

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

CATHERINE LAMAGNA	:	
	:	
v.	:	Docket No. C-2017-2608014
	:	
PENNSYLVANIA ELECTRIC COMPANY	:	
	:	

**MOTION OF PENNSYLVANIA ELECTRIC COMPANY TO COMPEL RESPONSES
TO INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS**

TO THE PENNSYLVANIA PUBLIC UTILITY COMMISSION:

Pennsylvania Electric Company (“Penelec” or the “Company”) by and through its attorneys, Lauren M. Lepkoski and Tori L. Giesler, and pursuant to 52 Pa. Code §§ 5.371-5.372, hereby files this Motion to compel Catherine Lamagna (“Complainant”) to provide full and complete responses to interrogatories and document requests issued by the Company on October 26, 2017. In support thereof, the Company avers as follows:

I. BACKGROUND

1. On or about June 6, 2017, the Complainant filed a Formal Complaint with the Pennsylvania Public Utility Commission (“Commission”) regarding 616 Main Street, Thompson, Pennsylvania 18465 (“Service Location”) under Account No.100075075448 (“Account”).

2. On June 26, 2017, the Company filed its Answer denying the material allegations.

3. On October 17, 2017, Administrative Law Judge Jeffrey A. Watson issued an Interim Order Setting Conference Between the Parties requiring that the parties hold a conference to discuss the Formal Complaint filed by the Complainant to determine whether a resolution of the Formal Complaint may be reached.

4. Company representatives as well as counsel for the Company have contacted the Complainant on multiple occasions. After the Interim Order was issued, the Company contacted

the Complainant once again to schedule a mediation conference. The Complainant ultimately declined to participate in a further mediation conference, and notified the mediator that she would like to proceed to hearing.

5. The hearing in this proceeding is scheduled for January 8, 2017.

6. On October 26, 2017, in accordance with 52 Pa. Code §§ 5.341 and 5.349, *et seq.*, the Company forwarded to the Complainant interrogatories and document requests (“Discovery Requests”) via overnight United Parcel Service delivery. In its Discovery Requests, the Company sought information and documents related to the Complainant’s allegations regarding the Company’s smart meters. A copy of the Discovery Requests of the Company is attached as Exhibit A.

7. Objections to Met-Ed’s Discovery Requests were due on or before November 6, 2017 and Answers to the Discovery Requests were due on or before November 16, 2017.

8. The Complainant did not file any objections to the Discovery Requests and has not provided any responses or any requested documents by the due date.

II. MOTION TO COMPEL

9. The Commission’s regulations permit the discovery of “any matter, not privileged, which is relevant to the subject matter involved in the pending action.” 52 Pa. Code § 5.321(c).

10. Generally speaking, this Commission applies a standard of relevance which is less restrictive than that required by parties to present information into the evidentiary record. *Id.*

11. Discovery may be obtained regarding any matter relevant to the subject matter. Relevant evidence is evidence that tends to make an act at issue more or less probable. Moreover, evidence is relevant if it advances the inquiry to some degree and, thus, has probative value. Although the law does not furnish an absolute test of relevancy, the Pennsylvania Supreme Court

follows a two-part analysis for determining relevance. In *Commonwealth v. Stewart*, 336 A.2d 282 (Pa. 1975), the Court held that “[i]t must be determined first if the inference sought to be raised by the evidence bears upon a matter at issue in this case and, second, whether the evidence renders the desired inference more probable than it would be without the evidence. *Id.* at 284.

12. The information sought here by the Company is relatively simple and straightforward. It is directly relevant and material to the issues raised by the Complainant. As a matter of due process, the Company is entitled to the requested information to enable it to fully investigate and respond to the Complainant’s allegations. Moreover, failure to respond to the Discovery Requests is “obstructive to the orderly conduct of the proceeding and inimical to the public interest” in contravention of the Public Utility Code. See 66 Pa. C.S. § 332(f).

13. The Commission’s regulations at 52 Pa. Code § 5.371 address the consequences of a participant’s failure to comply with the Commission’s discovery regulations. Section 5.371 provides that:

- (a) The Commission or the presiding officer may, on motion, make an appropriate order if one of the following occurs:
 - (1) A party fails to appear, answer, file sufficient answers, file objections, make a designation or otherwise respond to discovery requests, as required under this subchapter.

14. Further, 52 Pa. Code § 5.372 provides that the presiding officer may impose appropriate sanctions upon a party found to be in violation of the obligations set forth in the Commission’s Regulations.

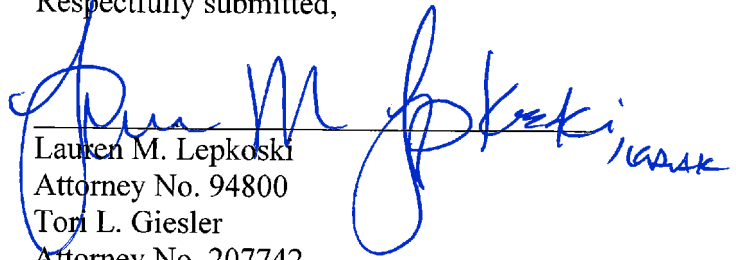
15. The Company requests that the Complainant be directed to provide full and complete responses to the Discovery Requests to be received by the undersigned counsel for the Company within five business days after entry of an Order Granting the Motion to Compel.

16. In the event the Complainant is directed by the Commission, but fails to respond to the Company's Discovery Requests, the Company respectfully requests that the Formal Complaint against the Company be dismissed in its entirety in accordance with prior Commission precedent. *See Julie Smith v. Metropolitan Edison Company*, Docket No. C-2016-2572867 (Final Order entered July 21, 2017).

WHEREFORE, Pennsylvania Electric Company respectfully requests that the Commission issue an Order compelling the Complainant to fully and completely respond to the Discovery Requests such that the responses are received by counsel for the Company no later than five business days after entry of an Order on the Motion to Compel. Further, in the event the Complainant does not comply with the Order directed by the Commission and fails to respond to the Company's Discovery Requests, the Company respectfully requests that the Commission dismiss in its entirety the Complaint of Catherine Lamagna.

Respectfully submitted,

Dated: November 22, 2017



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Counsel for Pennsylvania Electric Company

Teresa Harrold, Esq.
(610) 921-6783
(330) 315-9263 (Fax)

610-929-3601

October 26, 2017

VIA UNITED PARCEL SERVICE

Catherine LaMagna
616 Main Street
Thompson, PA 18465

Re: Catherine LaMagna v. Pennsylvania Electric Company
Docket No. C-2017-2608014

Dear Ms. LaMagna:

Enclosed please find the Interrogatories and Requests for Production of Documents (Set I) to Catherine LaMagna. Pursuant to 52 Pa. Code §§ 5.341 and 5.349, *et seq.*, your answers are due within twenty days of service of this letter (November 16, 2017). In addition, any objections are due within ten days of service of this letter (November 6, 2017). This document has been served as indicated within the Certificate of Service.

Very truly yours,



Teresa Harrold

Enclosures

- c: As Per Certificate of Service
Cynthia Lehman, Mediator, Public Utility Commission (Cover Letter and Certificate)
Rosemary Chiavetta, Esq., Public Utility Commission (Cover Letter and Certificate)

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

CATHERINE LAMAGNA

v.

PENNSYLVANIA ELECTRIC COMPANY

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Docket No. C-2017-2608014

**INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS OF
PENNSYLVANIA ELECTRIC COMPANY TO CATHERINE LAMAGNA, SET I**

The Pennsylvania Electric Company ("Penelec" or "Company") hereby propounds these Interrogatories and Requests for Production of Documents (Set I) to Catherine LaMagna (the "Complainant"). Telephone or other contact concerning availability and timing of formal responses is encouraged. The answer to each interrogatory should be started on a new page. The answers should restate the question asked and indicate the person(s) supplying the information.

Pursuant to 52 Pa. Code § 5.342, you must send your answers to me within 20 days (November 16, 2017) and objections within 10 days (November 6, 2017). Your answers and objections should not be filed with the Pennsylvania Public Utility Commission. You should only file the cover letter and certificate of service with the Commission's Secretary Rosemary Chiavetta. If you have any objection to any of the interrogatories or the request for documents, please identify the interrogatory or request and state your objection in full as to why you should not have to answer/produce it. Any objection not raised within the 10-day period provided for by 52 Pa. Code § 5.342(c) will be deemed waived and you will not be permitted to raise the objection at a later time.

Dated: October 26, 2017

INSTRUCTIONS

A. In answering these interrogatories and requests for production of documents, please furnish all information available to you, including any such information possessed by others that you can obtain, and not merely such information known of your own personal knowledge. If you cannot answer the interrogatories and requests in full after exercising due diligence to secure the information to do so, so state and answer to the extent possible.

B. Other than for the reasons identified herein, you must provide an answer to all interrogatories and requests for production of documents. If the answer to the question is "none" or "unknown," such statement must be written in the answer. If you consider the question to be inapplicable, "N/A" must be written in the answer. If an answer is omitted because of a claim of privilege, the basis of privilege is to be stated.

C. If the answer to any of the interrogatories and requests for production of documents is that you lack knowledge of some or all of the requested information, describe all efforts made by you to obtain the information necessary to answer that interrogatory or request.

D. These interrogatories and requests for production of documents are to be deemed continuing in nature, and you shall promptly supply, by way of supplemental response, any additional responsive information that may become known to you or anyone acting on your behalf after your answers have been prepared or served.

E. As used herein, the terms "Complainant" and "you" refer to Catherine LaMagna and her attorneys, agents, or representatives.

F. As used herein, the terms "Company," "Penelec," and "Respondent" refer to the Pennsylvania Electric Company, and any agent, agency, or affiliate thereof.

G. As used herein, the term "proceeding" refers to the instant complaint proceeding at the Pennsylvania Public Utility Commission at Docket No. C-2017-2608014.

H. As used herein, the terms "service location," "property," or "home" refer to your service address of 616 Main Street, Thompson, Pennsylvania, 18465.

I. As used herein, the term "household" refers to you and all other individuals who reside at the service location.

J. As used herein, the terms "document" or "documentation" include any written, printed, typed, recorded, or graphic matter, whether produced or reproduced or stored on paper, cards, tapes, film, electronic facsimile, computer storage devices or any other devices or media, including, but not limited to papers; books; letters; photographs; objects; tangible things; correspondence; e-mails; websites; webpages; telegrams; cables; telex messages; memoranda; medical records; notes; notations; records; work papers; transcripts; minutes; reports and recordings of telephone or other conversations, or of interviews, or of conferences, or of other meetings; affidavits; statements; opinions; proposals; reports; surveys; plans; studies; analyses; audits; evaluations; contracts; agreements; journals; statistical records; invoices; receipts; desk calendars; appointment books; diaries; lists; tabulations; summaries; sound recordings; computer printouts; data processing input and output; microfilms; all records kept by electronic, photographic, or mechanical means; and things similar to any of the foregoing, however denominated. When one or more of the foregoing documents is requested or referred to, the request or reference shall include, but is not limited to, the original and each and every copy and draft thereof having writings, notations, corrections, or markings unique to such copy or draft.

K. As used herein, all other words are to be given their ordinary and usual meanings, according to a current edition of Webster's Dictionary.

**INTERROGATORIES OF PENNSYLVANIA ELECTRIC COMPANY TO CATHERINE
LAMAGNA, SET I**

1. To your knowledge, has a smart meter been installed by the Company at your property?
2. Please describe in detail how you believe a smart meter operates.
3. Do you believe the installation of a smart meter at your property would create or worsen health issues for a member of your household?
4. If the answer to question 3 is yes, please provide the following information for each household member:
 - a. Name;
 - b. Age;
 - c. The specific health issues that you believe would be experienced after the smart meter is installed;
 - d. Whether the household member is already experiencing the specific health issues;
 - e. Whether the household member has experienced the specific health issues within the last four years;
 - f. Any medication prescribed to the household member;
 - g. Whether the household member has visited a medical professional for the specific health issue, and if so, the name, address, and phone number of the medical professional and the date of the visit(s) to the medical professional; and
 - h. Whether a medical professional has determined that the installation of a smart meter would create or worsen the specific health issue.
5. Please explain how the installation of a smart meter would create or worsen health issues for your household members. Be as specific as possible.
6. Please provide the following information in support of your position that health issues at your household would be created or worsened by the installation of a smart meter.
 - a. Please identify each document you rely on in support of your position.
 - b. Do you intend to rely on these documents at the time of the hearing in this proceeding?
 - c. Please describe in detail all information you have to support this position.

- d. Do you have any relevant educational or work background that qualifies you to assert this position?
 - e. If yes, please identify the relevant educational or work background that qualifies you to assert this position.
7. Would you consider yourself a medical professional?
 - a. If yes, please identify your medical professional title, relevant educational experience, and relevant work experience.
8. Do you believe the installation of a smart meter at your property would create safety concerns for a member of your household?
9. If the answer to question 8 is yes, please specifically identify each of your safety concerns related to smart meters.
10. Please provide the following information regarding your position that the installation of a smart meter would create safety concerns:
 - a. Please identify each document you rely on in support of the position.
 - b. Do you intend to rely on these documents at the time of the hearing in this proceeding?
 - c. Please describe in detail all information you have to support this position.
 - d. Do you have any relevant educational or work background that qualifies you to assert this position?
 - e. If yes, please identify the relevant educational or work background that qualifies you to assert this position.
11. Do you believe the installation of a smart meter at your property would have an impact on radio frequency ("RF") at your home?
12. If yes to question 11, please specifically identify all of the RF impacts associated with the installation of a smart meter.
13. Please provide the following information regarding your position related to the RF impact of a smart meter:
 - a. Please identify each document you rely on in support of this position.
 - b. Do you intend to rely on these documents at the time of the hearing in this proceeding?
 - c. Please describe in detail all information you have to support this position.

- d. Do you have any relevant educational or work background that qualifies you to assert this position?
 - e. If yes, please identify relevant educational or work background that qualifies you to assert this position.
14. Are there any cordless phones used in your home?
- a. Do you use a cellular phone?
 - b. Does anyone in your home use a cellular phone?
 - c. How many cellular phones are in use at your home?
15. Is there a microwave oven in your home?
- a. If yes, where is it located?
16. Is there satellite television in your home?
- a. If yes, where is it located?
 - b. How many satellite televisions are in use at your home?
17. Is there a laptop computer in your home?
- a. If yes, where is it located?
 - b. How many laptop computers are in use at your home?
18. In your complaint, you infer that an analog meter has safety features a smart meter does not have. Please provide the following information related to this position:
- a. What documents do you rely on in support of this position?
 - b. Do you intend to rely on these documents at the time of the hearing in this proceeding?
 - c. Please describe in detail the information you have to support this position.
 - d. Do you have any relevant educational or work background that qualifies you to take this position?
 - e. If yes, please identify relevant educational or work background that qualifies you to take this position.
19. Is it your position that a customer has the right to request a smart meter not be installed at her service location?

20. Is it your position that Act 129 of 2008 does not require the utility to install smart meters throughout its service territory?
21. Is it your position that you would like to opt out completely from smart meter installation?
22. Do you believe the installation of a smart meter at your property would violate the privacy or security of a member of your household?
23. If yes to question 22, please specifically describe each of your concerns regarding your household's privacy or security after the installation of a smart meter.
24. Please provide the following information regarding your position that the installation of a smart meter would violate your household's privacy or security:
 - a. Please identify each document you rely on in support of the position.
 - b. Do you intend to rely on these documents at the time of the hearing in this proceeding?
 - c. Please describe in detail all information you have to support this position.
 - d. Do you have any relevant educational or work background that qualifies you to assert this position?
 - e. If yes, please identify the relevant educational or work background that qualifies you to assert this position.
25. In your complaint, you state that "an analog meter cannot be hacked/cyber attacked," while "a smart meter is a computer device which is many times more vulnerable to cyber threats." Please provide the following information related to this statement:
 - a. What documents do you rely on in support of this statement?
 - b. Do you intend to rely on these documents at the time of the hearing in this proceeding?
 - c. Please describe in detail the information you have to support this statement.
 - d. Do you have any relevant educational or work background that qualifies you to make this statement?
 - e. If yes, please identify relevant educational or work background that qualifies you to make this statement.
26. In your complaint, you state that "smart meters are of inferior quality and have a service life of only 5 to 7 years while [an] analog meter does have surge protection

as well as a service life of 30-40 years." Please provide the following information related to this statement:

- a. What documents do you rely on in support of this statement?
 - b. Do you intend to rely on these documents at the time of the hearing in this proceeding?
 - c. Please describe in detail the information you have to support this statement.
 - d. Do you have any relevant educational or work background that qualifies you to make this statement?
 - e. If yes, please identify relevant educational or work background that qualifies you to make this statement.
27. In your complaint, you infer that smart meters do not "incorporate the superior quality, construction, and safety features already found in analog meters." Please provide the following information related to this statement.
- a. What documents do you rely on in support of this statement?
 - b. Do you intend to rely on these documents at the time of the hearing in this proceeding?
 - c. Please describe in detail the information you have to support this statement.
 - d. Do you have any relevant educational or work background that qualifies you to make this statement?
 - e. If yes, please identify relevant educational or work background that qualifies you to make this statement.
28. In your complaint, you state that "smart meters present serious health concerns including to me: smart meters are not grounded, emits dirty electricity, radio frequency power density levels for smart meters, various biological effects." Please provide the following information related to this statement:
- a. What documents do you rely on in support of this statement?
 - b. Do you intend to rely on these documents at the time of the hearing in this proceeding?
 - c. Please describe in detail the information you have to support this statement.
 - d. Do you have any relevant educational or work background that qualifies you to make this statement?

- e. If yes, please identify relevant educational or work background that qualifies you to make this statement.
29. In your complaint, you request that Penelec confirm that its "product is proven safe and cyber-secure by independent third party testing such as underwriters laboratories." Is it your position that Penelec's smart meters have not been tested by an independent third-party testing organization?
30. If your answer to question 29 is yes, please answer the following:
- a. What documents do you rely on in support of your position that Penelec's smart meters have not been tested by an independent third-party testing organization?
 - b. Do you intend to rely on these documents at the time of the hearing in this proceeding?
 - c. Please describe in detail the information you have to support of your position.
 - d. Do you have any relevant educational or work background that qualifies you to take this position?
 - e. If yes, please identify relevant educational or work background that qualifies you to take this position.
31. Please list the specific issues you intend to raise at the hearing in this proceeding.
32. Please identify the legal support, including specific citations, for each of the issues raised within your complaint.
33. Please provide the following information for all witnesses you intend to call to testify at the hearing in this proceeding.
- a. Provide the full name of the witness.
 - b. Provide the contact information of the witness.
 - c. Provide the title or position held by the witness.
 - d. Provide the educational background of the witness.
 - e. Provide the employment background of the witness.
 - f. Provide the scope of the testimony for the witness.
34. Would any witness identified in question 33 be offered as an expert?
- a. If yes, provide the curriculum vitae of the witness and state the scope of the testimony of the expert witness.

35. Please describe in detail your educational background.
 - a. Please list any relevant certificates, trainings, or degrees that you obtained.
 - b. Please provide a description of the certificate, training, or degree.
 - c. Please provide the date that any certificate, training, or degree was obtained.
 - d. Please provide the name and address of the institution which provided the certificate, training, or degree.

36. Please describe in detail your employment history.
 - a. Please provide your employer name and address.
 - b. Please provide the title of your position.
 - c. Please provide the dates of your employment.
 - d. Please provide the duties performed in your position.

**REQUESTS FOR PRODUCTION OF DOCUMENTS OF PENNSYLVANIA ELECTRIC
COMPANY TO CATHERINE LAMAGNA, SET I**

37. Please provide copies of all documentation supporting your position that health issues in your household would be created or worsened by smart meter installation.
38. Please provide copies of all documentation you intend to refer to at the hearing in this proceeding related to the impact of smart meters on a person's health or on the health of your household members.
39. Please provide copies of all documentation supporting your position that smart meters would create safety issues for you or members of your household.
40. Please provide copies of all documentation you intend to refer to at the hearing in this proceeding related to the safety concerns of smart meters.
41. Please provide copies of all documentation supporting your position related to the RF impact of smart meters.
42. Please provide copies of all documentation you intend to refer to at the hearing in this proceeding related to the RF impact of smart meters.
43. Please provide copies of all documentation supporting your position related to the cybersecurity or privacy issues created by smart meters.
44. Please provide copies of all documentation you intend to refer to at the hearing in this proceeding related to the cybersecurity or privacy issues created by smart meters.
45. Please provide copies of all documentation supporting your position that Penelec's smart meters have not been tested by a third-party testing organization.
46. Please provide copies of all documentation you intend to refer to at the hearing in this proceeding related to the testing of Penelec's smart meters by a third-party testing organization.
47. Please provide copies of all documentation supporting your position related to the availability of an opt-out from smart meter installation.
48. Please provide copies of all documentation you intend to refer to at the hearing in this proceeding related to the availability of an opt-out from smart meter installation.
49. Please provide copies of all proposed exhibits you intend to submit for the hearing in this proceeding.
50. Please provide copies of all documentation you are relying upon in support of your positions in this proceeding.

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

CATHERINE LAMAGNA

v.

PENNSYLVANIA ELECTRIC COMPANY

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Docket No. C-2017-2608014

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the Interrogatories and Requests for Production of Documents of Pennsylvania Electric Company to Catherine LaMagna upon the individual listed below, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

Service by United Parcel Service, postage prepaid, as follows:

Catherine LaMagna
616 Main Street
Thompson, PA 18465

Dated: October 26, 2017



Teresa Harrold
FirstEnergy Service Company
2800 Pottsville Pike
P.O. Box 16001
Reading, Pennsylvania 19612-6001
(610) 921-6783
[tharrold\(a\),firstenergycorp.com](mailto:tharrold(a),firstenergycorp.com)

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

CATHERINE LAMAGNA

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PENNSYLVANIA ELECTRIC COMPANY

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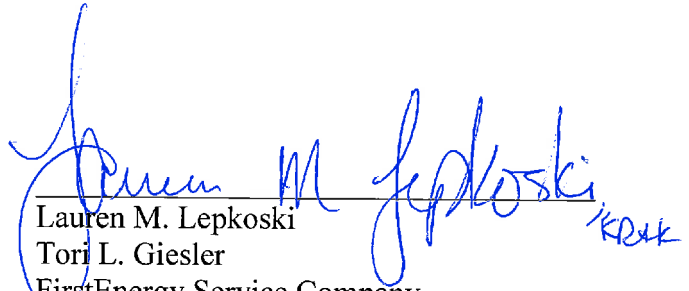
CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the Motion to Compel of Pennsylvania Electric Company upon the individual 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, as follows:

Catherine Lamagna
616 Main Street
Thompson, PA 18465

Dated: November 22, 2017



Lauren M. Lepkoski
Tori L. Giesler
FirstEnergy Service Company
2800 Pottsville Pike
P.O. Box 16001
Reading, Pennsylvania 19612-6001
(610) 921-6203
(610) 921-6658
llepkoski@firstenergycorp.com
tgiesler@firstenergycorp.com