

December 11, 2017

Via Electronic Filing

Rosemary Chiavetta, Esquire
Secretary
PA Public Utility Commission
P.O. Box 3265
Harrisburg, PA 17105-3265

**Re: Docket No. C-2017-2610125
Joanne M. Fiorito v. Pennsylvania Electric Company
Penelec's Response to requested Protective Order for Trade secrets**

Dear Secretary Chiavetta:

Please accept this letter on behalf of the Respondent, Pennsylvania Electric Company (Penelec), in response to the Petition for Protective Order filed by the Complainant, Joanne M. Fiorito, regarding the disclosure of trade secrets or other confidential information into the public record. Specifically, the Complainant seeks a Protective Order on questions 1,2,4,5 and 6. A copy of the specified questions is provided as Attachment 1.

Penelec does not oppose the request that the responses to the above designated questions be subject to a Protective Order and and designated "CONFIDENTIAL" and/or "PROPRIETARY" in this proceeding. Penelec further agrees that Confidential/Proprietary Information will be provided to its counsel of record and Penelec's witness(es) and/or expert(s), to the extent required and for the limited purpose of participation in the above-captioned proceedings, who comply with the provisions of the entered Protective Order.

Penelec has confirmed with the Complainant that she is not alleging any health issue (current or future) in this proceeding. Therefore questions 29-36 are no longer relevant to the complaint and a response is no longer sought. A copy of this correspondence has been provided to the Complainant in the manner indicated on the attached Certificate of Service.

If there are any questions, please do not hesitate to contact me.

Very truly yours,

Reger Rizzo & Darnall LLP

Margaret A. Morris

MAM

cc: The Honorable Jeffrey A. Watson, PA Public Utility Commission
Teresa K. Harrold, Esquire, FirstEnergy Service Company
Joanne M. Fiorito

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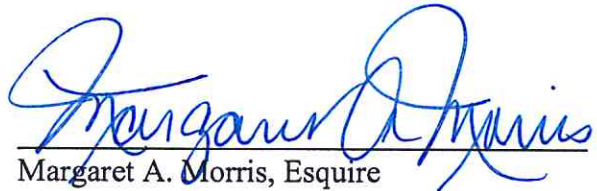
CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document has been served upon the following person(s), in the manner indicated, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

Via First Class Mail

Joanne M. Fiorito
173 Brookside Road
Tunkhannock, PA 19657

Dated: November 11, 2017


Margaret A. Morris, Esquire

Docket No. C-2017-2610125
Joanne M. Fiorito v. Pennsylvania Electric Company

Attachment 1

Interrogatories Subject to Requested Protective Order

1. Describe in detail your educational background.
 - a. Provide the names and addresses of all institutions that you have attended.
 - b. Provide the dates of attendance.
 - c. Provide a description of the degrees or certificates you have obtained.

2. Describe in detail your employment background.
 - a. Provide employer name and addresses.
 - b. Provide the title of your position.
 - c. Provide the dates of employment.
 - d. Provide the duties performed in your position.

4. Describe in detail your educational background related to radio frequency (RF).
 - e. List any relevant certificates, trainings, or degrees that you obtained.
 - f. Provide a description of the certificate, training, or degree.
 - g. Provide the date that any certificate, training, or degree was obtained.
 - h. Provide the name and address of the institution which provided the certificate, training, or degree.

5. Describe in detail your employment history related to RF.
 - i. Provide employer name and address.
 - j. Provide the title of your position.
 - k. Provide the dates of employment.
 - l. Provide the duties performed in your position.

6. In your complaint, you state “as an audio engineer by trade I am well aware of the effects RF (radio waves) can have on the human body.” Please provide the following information related to this statement:
 - m. Describe in detail your professional experience with RF waves as an audio engineer.
 - n. Describe in detail what effects “RF waves can have on the human body.”
 - o. Provide any document you relied upon to come to this conclusion.