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BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

CHRISTOPHER L. MACEY :
 :
 v. : Docket No. C-2017-2628021
 :
 WEST PENN POWER COMPANY :

**OBJECTIONS TO THE INTERROGATORIES AND REQUESTS FOR PRODUCTION
OF DOCUMENTS OF WEST PENN POWER COMPANY TO CHRISTOPHER L.
MACEY, SET 1**

TO THE PENNSYLVANIA PUBLIC UTILITY COMMISSION
AND NOW, Christopher L. Macey, pro se, Objects to the Interrogatories of West Penn
Power Company to Christopher L. Macey, Set 1, and Requests for Production of
Documents of West Penn Power Company to Christopher L. Macey, Set 1, as follows:

I. Interrogatories

1. **2.d. through 2.h.** Objection that the interrogatories seek information that is private and protected by the rights listed in the HIPAA law of 1996.
2. **16.a. through 16.f.** Objection that the interrogatory seeks the complainant has not established yet, pending service and response to discovery to be sent to the Respondent.
3. **17.** Objection that the interrogatory seeks information that the complainant has not established yet.

II. Requests for Production of Documents

4. **21.** Objection that the Request for Production of Documents seeks information that is private and protected by the rights listed in the HIPAA law of 1996.

Dated this 7th day of February, 2018


Christopher L. Macey pro se

INTERROGATORIES OF WEST PENN POWER COMPANY TO CHRISTOPHER L. MACEY, SET I

1. Do you believe the installation of a smart meter at your property would create or worsen health issues for a member of your household?
2. If the answer to question 1 is yes, please provide the following information for each household member:

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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; *Objection - Information as private protected by HIPAA law of 1996.*

e. Whether the household member has experienced the specific health issues within the last four years; *Objection - Information as private per HIPAA law.*

f. Any medication prescribed to the household member; and *Objection - Information as private protected by HIPAA law of 1996.*

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. *Objection - HIPAA law.*

h. Whether a medical professional has determined that the installation of a smart meter would create or worsen the specific health issue. *Objection - HIPAA law*

Christopher L Macey
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3. Please explain how the installation of a smart meter would create or worsen health issues for your household members. Be as specific as possible.

4. 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.

5. Would you consider yourself a medical professional?
 - a. If yes, please identify your medical professional title, relevant educational experience, and relevant work experience.

6. In your "Response to Preliminary Objections," you state: "Complainant alleges that the Company's actions of installing a smart meter will inflict physical and/or mental pain and harm on occupants of buildings where smart meters have been installed."

- a. What documents do you rely on in support to support your allegation that “the Company’s actions of installing a smart meter will inflict physical and/or mental pain and harm on occupants where smart meters have been installed.”
 - 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 your allegation that “the Company’s actions of installing a smart meter will inflict physical and/or mental pain and harm on occupants where smart meters have been installed.”
 - d. Do you have any relevant educational or work background that qualifies you to make this statement?
 - e. If yes, please identify the relevant educational or work background that qualifies you to make this statement?
 - f. Please describe the nature and extent of the “physical and/or mental pain and harm” that has or will be inflicted “on occupants of buildings where smart meters have been installed.”
7. In your “Response to Preliminary Objections,” you state: “Formal Complaint is necessarily in the general public’s relief, due to the number of requests by the persons requesting relief from the installation of smart meters.”
- 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 the relevant educational or work background that qualifies you to make this statement.
 - f. Please provide the "number of requests" that are referenced as being by "persons requesting relief from the installation of smart meters."
8. In your "Response to Preliminary Objections," you state: "The literature is replete with anecdotal information, including testimony in the Respondent's cited cases, that human beings can be sensitive to electromagnetic fields."
- a. Please identify the "literature" referenced in this statement.
 - b. Do you intend to rely on this "literature" at the time of the hearing in this proceeding?
 - c. Please describe in detail any information you have to support the statement that "human beings can be sensitive to electromagnetic fields."
9. In your "Response to Preliminary Objections," you state: "Even a search of US Letters Patent yields several patents establishing this concept."

- 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 the relevant educational or work background that qualifies you to make this statement.
10. In your Formal Complaint you request that the “judge compel West Penn Power/FirstEnergy to delay installation of the Smart Meter to 4th Quarter 2022 for [your] residence at 201 Highland Avenue S, Oakdale, PA 15071.”
- a. Do you believe that all of the Company’s customers should have the ability to defer installation of a smart meter at their property until the fourth quarter of 2022?
 - b. If yes, what is your basis for this belief?
 - c. If no, under what circumstances do you believe a customer should have the ability to defer installation of a smart meter at his or her property until the fourth quarter of 2022?
11. To your knowledge, has a smart meter been installed by the Company at your property?

12. Please describe in detail how you believe a smart meter operates.
13. Please list the specific issues you intend to raise at the hearing in this proceeding.
14. Please identify the legal support, including specific citations, for each issue identified in question 13.
15. Please list the factual support for each issue identified in question 13.
16. Please provide the following information for all witnesses you intend to call to testify at the hearing in this proceeding.

Objection - Unknown at this time, pending discovery.

- a. Provide the full name of the witness.

Objection -

- b. Provide the contact information of the witness.

Objection -

- c. Provide the title or position held by the witness.

Objection -

- d. Provide the educational background of the witness.

Objection -

- e. Provide the employment background of the witness.

Objection -

- f. Provide the scope of the testimony for the witness.

Objection -

17. Would any witness identified in question 16 be offered as an expert?

Objection -

- a. If yes, provide the curriculum vitae of the witness and state the scope of the testimony of the expert witness. *Objection -*

18. 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.
19. 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 WEST PENN POWER
COMPANY TO CHRISTOPHER L. MACEY, SET I**

20. Please provide copies of all documentation supporting your position that the health issues of your household would be created or worsened by the installation of a smart meter.

~~21. Please provide copies of all documentation associated with visits by members of your household to a medical professional related to the health issues identified in~~

~~question 20.~~ *Objection - Information protected as private by the HIPAA law of 1996 -*

22. 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.

23. Please provide copies of all documentation supporting your position that your household may defer installation of a smart meter until the fourth quarter of 2022.

24. Please provide copies of all documentation you intend to refer to at the hearing in this proceeding supporting your position that a household may defer installation of a smart meter until the fourth quarter of 2022.

25. Please provide a copy of all proposed exhibits you intend to submit for the hearing in this proceeding.

26. Please provide copies of all documentation you are relying upon in support of your positions in this proceeding.

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WEST PENN POWER COMPANY :

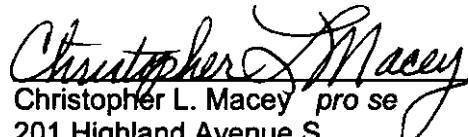
CERTIFICATE OF MAILING

I hereby certify that I have this day mailed a correct and true copy of the Objections to the Interrogatories and Requests for Production of Documents of West Penn Power Company to Christopher L. Macey, set 1, upon the individuals listed below.

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

Lauren M. Lepkoski
First Energy Services Company
2800 Pottsville Pike
P.O. Box 16001
Reading, Pennsylvania 19612-6001

Dated: February 1, 2018


Christopher L. Macey *pro se*
201 Highland Avenue S
Oakdale, PA 15071 - 1125
724-255-7408

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M

Christopher Macey
201 S. Highland Ave.
Oakdale, PA 15071



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