



An Exelon Company

Legal Department
2301 Market Street / S23-1
Philadelphia, PA 19103

Direct Dial. 215.841.6863

February 16, 2018

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

Re: Alexia McKnight v. PECO Energy Company
Docket No. C-2017-2621057

Dear Secretary Chiavetta:

PECO's Motion to Require In-Person Testimony by Complainant's Expert Witnesses is attached for filing.

Very truly yours,

A handwritten signature in black ink, appearing to read "Ward L. Smith".

Ward L. Smith
Counsel for PECO Energy Company

WS/adz
Enclosures

c: Honorable Darlene D. Heep, ALJ
Certificate of Service

RECEIVED
FEB 16 2018
PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

PENNSYLVANIA PUBLIC UTILITY COMMISSION

ALEXIA MCKNIGHT :
Complainant :
v. : DOCKET NO. C-2017-2621057
:
PECO ENERGY COMPANY :
Respondent :

NOTICE TO PLEAD

To: Alexia McKnight

Pursuant to 52 Pa. Code §5.61, you are hereby notified that if you have any Answer to this Motion, you must serve that Answer, in writing, within 20 days of receipt of this Motion. If you do not file a written Answer, the issues raised in this Motion may be decided against you without any further opportunity to be heard. If you do file an Answer, you must provide a full copy of the Answer to the Administrative Law Judge and counsel for PECO.

File with:
Rosemarie Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, Second Floor
Harrisburg, PA 17120

With a copy to:

Administrative Law Judge Darlene Heep
Pennsylvania Public Utility Commission
801 Market Street
Philadelphia, PA 19107
dheep@pa.gov

Ward L. Smith, Esq.
PECO Energy Company
2301 Market Street, S-23
Philadelphia, PA 19103
Dated at Philadelphia, PA, February 16, 2018.

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FEB 16 2018

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU



Ward L. Smith
Assistant General Counsel
PECO Energy Company
2301 Market Street S23-1
Philadelphia, PA 19103

RECEIVED

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

FEB 16 2018

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

ALEXIA MCKNIGHT :
Complainant :
v. : DOCKET NO. C-2017-2621057
: :
PECO ENERGY COMPANY :
Respondent :

**MOTION OF PECO ENERGY COMPANY
TO REQUIRE IN-PERSON TESTIMONY BY COMPLAINANT'S EXPERT
WITNESSES**

On February 13, 2018, the parties exchanged witness identifications and summaries. Complainant Alexia McKnight identified two witnesses – Dr. Samuel Milham, who she describes as an expert; and Dr. William Rea, who she describes as her treating physician. As to Dr. Milham, she states “Dr. Milham is in his mid 80’s and not traveling. He is only available to testify via teleconference.” As to Dr. Rea she states: “Dr. Rea is also in his 80s, unable to walk and is also only available to testify via teleconference.”

The normal procedure here would be for Dr. McKnight to file a Motion in which she would request permission from Your Honor for leave to have her witnesses appear in this non-traditional manner. But Dr. McKnight is appearing *pro se* and may not file such a Motion for some time (or at all), and PECO believes that this is an important procedural question that should be resolved sooner rather than later. It is therefore filing this Motion to quickly bring this matter before Your Honor.

PECO strongly believes that both of these witnesses should be required to appear to testify and be cross-examined *in person*, and requests that Your Honor rule that they must so appear. In support thereof, PECO offers three positions:

- There is substantial reason to disbelieve the assertion that these witnesses are unable to travel.
- Dr. Rea is actually being offered as an expert witness, not simply as a treating physician, and his appearance should thus be evaluated pursuant to the rules applicable to expert witnesses.
- Allowing expert witnesses to make their first appearance via teleconference or video conference substantially impairs Your Honor's ability to judge their credibility and substantially violates PECO's due process rights to confront and cross-examine the expert witnesses.

I. BACKGROUND

The evidentiary hearing in this matter is scheduled for April 10, 2018. By Prehearing Order issued on October 23, 2017, Your Honor ordered that: "**ON OR BEFORE February 13, 2018**, any party wishing to present expert testimony (medical, technical, etc.) must provide to the other party the name and business address of that expert and a written summary of the expected testimony of that expert;[and] **ON OR BEFORE February 13, 2018**, any party wishing to present factual testimony of any person other than the Complainant must provide to the other party the name and business address of that person and a written summary of the expected testimony of that person."

In compliance with that Prehearing Order, on February 13, 2018, PECO served witness reports for the four witnesses who will appear on its behalf (Mr. Uber, Mr. Pritchard, Dr. Davis, and Dr. Israel). For her part, Dr. McKnight proffered the following two witnesses (original attached as Exhibit A):

1. Dr. Sam Milham, MD, MPH
2318 Gravelly Beach Loop NW
Olympia, WA 98502

Dr. Milham requested use of his prior testimony before the Arizona Corporation Commission as a summary testimony for my case, which is attached (pages 2-52). Dr. Milham is in his mid 80's and not traveling. He is only available to testify via teleconference.

2. Dr. William Rea, MD
Environmental Health Center
8345 Walnut Hill Lane, Suite 220
Dallas, TX 75231

Dr. Rea was my treating physician at the Environmental Health Center in Dallas, TX and will provide clinical testimony as such. His medical summary letter was included [in] my answers to PECO's Interrogatories and Requests for Production of Documents, Set I. In addition, please use the attached document of Dr. Rea's previous testimony as a summary testimony for my case (pages 53-106). Dr. Rea is also in his 80s, unable to walk and is also only available to testify via teleconference.

II. Argument – Your Honor should require Complainant's expert witnesses to appear in person to testify and be cross-examined

A. There is substantial reason to disbelieve the assertion that Complainant's expert witnesses are unable to travel

Let's begin with Dr. Rea, about whom Dr. McKnight says that he is "also in his 80s, unable to walk and is only available to testify via teleconference."

A brief online search shows that, on April 6, 2018 – four days before the evidentiary hearing in this case – Dr. Rea is scheduled to appear on a conference panel in Scottsdale, Arizona. See Exhibit B and <http://environmentalhealthsymposium.com/ehs-2018/#2018-speakers>. Scottsdale is nearly 900 miles from Dr. Rea's Dallas, Texas address. Dr. Rea clearly can travel when he thinks the destination is worthwhile.

There is similar information that Dr. Milham is able to travel to testify. On May 1, 2017 – less than ten months ago – Dr. Milham appeared to testify and be cross-examined in Phoenix, Arizona. (Indeed, he appeared to testify and be cross-examined about the same prefiled testimony that Dr. McKnight has offered as his summary report in this proceeding.) The transcript of that testimony makes it clear that he testified in the hearing room in Phoenix, not remotely from Olympia. When Dr. Milham was called as a witness, the presiding Administrative Law Judge stated: “If [Dr. Milham] will come to the stand. This is the witness stand. And the court reporter will swear you in when you get up here and get settled in.” *See Exhibit C.* Phoenix is over 1100 miles from Dr. Milham’s Olympia, Washington address. Dr. Milham clearly can travel to testify, as recently as ten months ago.

PECO recognizes that, in some prior AMI cases, Your Honor accepted the representations of counsel or complainants that their treating physicians were too infirm to travel. The primary example is that Dr. Hanoch Talmor, a treating physician, was twice allowed to testify (in 2016 and 2017), by videoconference, from his office in Gainesville, Florida rather than appearing in the hearing room in Philadelphia. PECO now has reason to believe that those representations were equally suspect. In late 2017, Dr. Talmor’s website stated that he would be giving a workshop in Ann Arbor, Michigan in October 2017. *See Exhibit D.* Ann Arbor is over 1,000 miles from Dr. Talmor’s Gainesville, Florida address. Simply this: Even though Your Honor was informed in 2016 and 2017 that Dr. Talmor was too infirm to travel to Philadelphia, it appears that in October 2017 he traveled over 1,000 miles to give a workshop in Michigan. This sequence suggests that the procedure previously used in these cases, in which Your Honor simply accepted assertions of witness infirmity without further proof, should no longer be used.

Decisions regarding the conduct of the hearing are Your Honor's purview. 52 Pa. Code §5.485. That authority includes the right to make decisions as to whether witnesses will be required to appear at hearing. The flip side of that equation is that neither Dr. McKnight, nor Dr. Milham, nor Dr. Rea, get to decide whether their testimony will be done remotely. Yet, they appear to be attempting to make that decision themselves, by their statements that the witnesses are "only available" by teleconference, even though those witnesses clearly have the ability to travel.

Collectively, the information on the travel habits of Dr. Rea, Dr. Milham, and Dr. Talmor suggests that Your Honor should have considerable skepticism about assertions that these witnesses are *unable* to travel to hearing and be cross-examined in person. Indeed, it seems much more likely that they are *able* to travel to this hearing, but are simply *unwilling* to do so – which is a very different thing.

In PECO's view, the information provided above is sufficient for Your Honor to conclude that both Dr. Milham and Dr. Rea are physically able to travel and appear at hearing, and to rule that they must do so. However, if Your Honor believes that she needs more information about the asserted infirmity of these witnesses prior to deciding this issue, PECO suggests that the best way of obtaining that information is to have an on-the-record telephonic hearing with a court reporter, with the witnesses sworn and their answers set down in a transcript, during which Your Honor and the parties can inquire further into the state of the asserted infirmities that purportedly prevent the in-person attendance at hearing of these two witnesses.

B. Dr. Rea is actually being offered as an expert witness, not simply as a treating physician, and his appearance should thus be evaluated pursuant to the rules applicable to expert witnesses

During the approximately two years that Your Honor has been hearing these AMI/health proceedings, Your Honor has been called upon to make numerous decisions as to whether witnesses will be allowed to testify remotely. The pattern of those rulings is quite clear: for expert witnesses, Your Honor has required every expert to appear in person, at least for their first appearance. (Dr. Marino was allowed to appear by phone for his second appearance.) Treating physicians have preferentially appeared in person, but were allowed to appear by videoconference (never teleconference) if the complainant demonstrated to Your Honor's satisfaction that the treating physician was unable to appear in the hearing room.

PECO believes that it has demonstrated that Dr. Rea does have the ability to appear in the hearing room – for example, when he leaves his conference in Scottsdale after his speech on April 6, he can fly directly to Philadelphia rather than flying home to Dallas – and that Dr. Rea should thus be required to appear in person regardless of whether he is characterized as a treating physician or as an expert. But beyond that, he is clearly being offered as an expert witness, and the question of whether he should be allowed to appear remotely should thus be evaluated using the decision rules for experts – that is, his first appearance must be in person.

To demonstrate that Dr. Rea is being offered as an expert, we must review the summary of his testimony that was provided by Dr. McKnight on February 13. She stated (emphasis added):

Dr. Rea was my treating physician at the Environmental Health Center in Dallas, TX and will provide clinical testimony as such. His medical summary letter was included [in] my answers to PECO's Interrogatories and Requests for Production of Documents, Set I. In addition, please use the attached document of Dr. Rea's previous testimony as a summary

testimony for my case (pages 53-106). Dr. Rea is also in his 80s, unable to walk and is also only available to testify via teleconference.

The “previous testimony” referred to in this sentence is the pre-filed testimony of Dr. Rea before the Maine Public Utility Commission in MPUC Docket No. 2011-00262, dated January 29, 2013. *See Exhibit E, p. 8.*

This testimony in no way is the testimony of a treating physician. In it, Dr. Rea never mentions Dr. McKnight. That is not surprising, since he provided this testimony in January 2013 and it was nearly three years after that, in November 2015, when PECO first installed an AMI meter at the McKnight residence and when she states that she began to have symptoms that required treatment. The “summary testimony” that is being offered in this case (the Maine testimony) was thus prepared approximately three years before Dr. Rea ever treated Dr. McKnight. It is not possible for that to be testimony offered as a treating physician.

Moreover, the proffered testimony (p. 8) specifically elicits Dr. Rea’s expert opinion regarding whether there is “a scientific basis for concluding that RF emissions from smart meters could trigger adverse symptoms in people who have developed EHS.” (He thinks there is.) Clearly, Dr. McKnight expects to elicit testimony from Dr. Rea that states an expert opinion on the ultimate scientific question at issue in this proceeding. He is thus being offered as an expert, and Your Honor properly has not allowed first-appearance distant testimony from witnesses who are offered as experts.

C. Allowing expert witnesses to make their first appearance via teleconference or video conference substantially impairs Your Honor's ability to judge their credibility and substantially violates PECO's due process rights to confront and cross-examine the expert witnesses

As noted above, in prior rulings in these AMI/health cases, Your Honor has required every expert to appear in person, at least for their first appearance. In making those rulings, Your Honor made clear that you believe that, in order to fully adjudge the credibility of the witnesses, you need to observe them in person.

PECO believes that these in-person observations have been an important element of Your Honor's evaluation of these witnesses and their testimony in these cases, and urges Your Honor not to forego the important opportunity to adjudge the credibility of these witnesses through personal observation of them. Moreover, PECO notes that, if the assertions of "unavailability to appear" came directly from the witnesses, their credibility should already be suspect. This heightens the need for Your Honor to see these witnesses eye-to-eye.

PECO also believes that the ability to cross-examine these witnesses in person is important to protect its due process rights in this proceeding. As Your Honor is aware, proper cross-examination of these witnesses can take considerable time, and can require questions regarding multiple documents to determine whether the documents are consistent with the conclusions the witness draws from them. The documents have to be shown to the witness in real time; such cross-examination exhibits cannot be shared prior to trial, because the shape and exact nature of cross-examination is not known until the direct examination is complete, and indeed often changes materially during the course of the cross-examination itself. Moreover, cross-examination often involves having a witness state their views on a subject (on either direct or cross), and then attempting to impeach those views of cross; such impeachment often requires

that the witness *not* be given cross-examination exhibits prior to the actual examination. Finally, because of the way microphones are set up in videoconferencing, it is virtually impossible for either Your Honor or PECO to affect the flow of testimony from a witness testifying by videoconference, with the result that it is very difficult to ask any structured set of questions of the witness. Indeed, experience in these cases shows that video testimony, on both direct and cross, can quickly become a free-flowing soliloquy on whatever subjects happen to come to the witness's mind – the experience(s) with Dr. Talmor being a clear example of this phenomenon. The result of this combination of factors is that, when an expert testifies from a distance, PECO is unable to bring appropriate rigor to the cross-examination – so much so that PECO's due process rights to confront the witness are substantially impaired by the use of distant testimony for first time experts.

III. Two procedural codas

Before closing this Motion, PECO has two brief procedural codas.

First, the normal reply period for motions is 20 days, unless Your Honor sets a different time period. 52 Pa. Code §5.61. This matter is not very complex, and it needs to be resolved in a timely fashion. (If PECO prevails, Drs. Milham and Rea will need to make travel plans.) PECO therefore requests that Your Honor set a short return period.

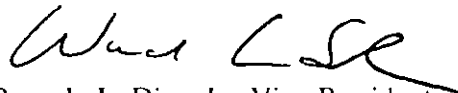
Second, if normal procedure had been used, this issue would have come before Your Honor through a Motion from Dr. McKnight to allow remote testimony. In that case, before PECO answered it would have seen all of Dr. McKnight's arguments. Because PECO has taken steps to initiate this discussion, all it has seen with respect to Dr. McKnight's request for remote testimony is the sentence or two from her witness identification, as quoted above. If Dr.

McKnight's Answer to this Motion materially expands her rationale for requesting distant testimony, PECO expects to file a reply to that Answer and, at that time, to request that Your Honor accept and consider said reply.

IV. CONCLUSION

WHEREFORE, for the reasons set forth above, PECO respectfully requests that Your Honor (a) grant this Motion; and (b) rule that both Dr. Milham and Dr. Rea must appear in person at hearing and be subjected to live cross-examination.

Respectfully submitted,



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202-258-6577

Counsel to PECO Energy Company

February 16, 2018

EXHIBIT A

McKnight Witness List

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PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

February 13, 2018

**Expert Witnesses for the McKnight Case
Docket # C-2017-262105**

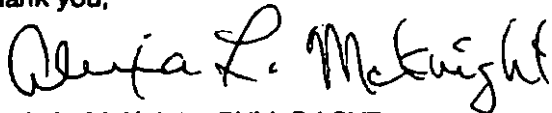
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Thank you,



Alexia L. McKnight, DVM, DACVR

EXHIBIT B

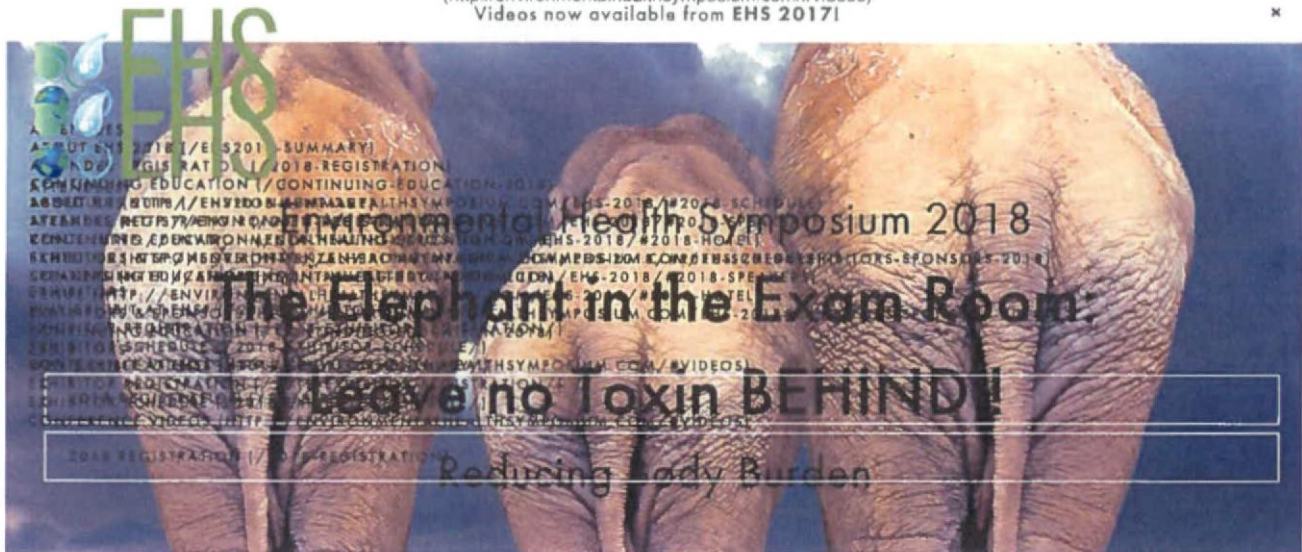
**April 6, 2018 Environmental Health Symposium, Scottsdale, Arizona
Speakers and Schedule**

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FEB 16 2018

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SECRETARY'S BUREAU**

(<http://environmentalhealthsymposium.com/#videos>)
 Videos now available from EHS 2017!



EHS 2018 About this Years Conference

“Reducing Toxic Load”

The Environmental Health Symposium is the premier Environmental Medicine conference dedicated to helping clinicians become proficient and current in diagnosing and treating patients whose illness stems from a burden of toxic compounds. This conference provides strategies to prevent and reverse the conditions that are threatening the health and vitality of this and future generations to come.

Each year we invite the experts to join EHS and present the latest and most accurate information. Our twelve presenters from last years' conference had a combined total of 824 peer-reviewed published articles. This year the conference will be focused on who is most vulnerable to toxic exposures and providing evidence for reducing the total toxic load that all persons carry.

The CDC reports that over 120 toxic chemicals and metals, out of a total of 246 measured, are present in the average U.S. resident. This load is a prime causative factor for all of the epidemic chronic diseases in the U.S. and must be addressed.

Effective means of avoidance and reduction of toxic exposures will be explained in easily adaptable protocols.

Speakers will present their decades worth of experience to the attendees. Solid evidence of toxicant reduction, biomarker and clinical improvement will be presented. You will hear what actually works, not just hopeful theory.

Using current treatment strategies that are peer-reviewed and published in the current medical literature, this conference will provide a solution to the unsustainable current situation of exposure and disease.

At this conference you will

- Learn effective strategies that safely lower body burden and improve health outcomes
- Gain expertise in evaluating body burden of toxicants from experts in the field of Environmental Medicine
- Discover the newest research and the most useful laboratory testing in the field of toxicogenomics and how to apply this knowledge in helping individual patients
- Become an expert in the application of nutrition and botanical strategies for reducing body burden and avoidance of everyday toxicants in your patients and yourself

Come to EHS and join the growing community of healthcare providers committed to offering answers to the increasing number of patients with conditions related to toxic environmental exposures.



**Environmental
Health
Symposium 2018**

Fri, Apr 06 - Sun, Apr 08 at
8:00 AM-8:00 PM

Full Conference \$899.00 0

Single Day \$325.00 0

Full Conference (Student)

Students must be registered at an accredited university in a healthcare field. After you register, please send a copy of your
[More info](#)

\$295.00 0

	Standard by 3/15/18	Late on or after 3/16/18
Full Conference	\$899	\$1,100
Single Day	\$325	\$399
Student Full Conference	\$295	\$395
Student Single Day	\$115	\$175

If you would like to bring your spouse or a non-practitioner office staff, you may register them for an additional \$200. Proof of employment required.

Health Symposium is open to trade professionals. Due to liability restrictions, no one under the age of 18, including infants and toddlers, will be allowed at the conference and on the exhibit show floor at any time. There will be NO exceptions.

Cancellation Policy

Cancellations must be received in writing no later than January 31, 2018, to be eligible for a refund, less a \$150 cancellation fee. Cancellations received after January 31 and before February 25, 2018 are eligible for a refund less a \$300 late cancellation fee. Cancellations received after February 25 are non-refundable. Tuition is non-transferable. Failure to appear at the program without prior written cancellation will result in forfeiture of full tuition and the course will not count toward certification (tuition is non-refundable, non-transferable, no exceptions). Program materials are available only to onsite attendees.

Cancellation requests must be received in writing by email, and EHS will reply with our decision.

Cancellation Request

Continuing Education

CE credits will be provided through the Oregon Board of Naturopathic Medical Education for 18.5 general CE hours and 1.0 hours of pharmacy CE.

The California Naturopathic Medicine Committee has approved EHS 2018 for the following: 18.5 General CE and 1.0 Pharmacy CE.

Attention California, Arizona, Utah, Washington, and Oregon NDs: You are automatically approved for CEs in your state as a result of our AMA PRA Category 1™ accredited activity.

National Association of Nutrition Professionals has approved this activity for 18.0 Category 2 CEUs for NANP members.

This activity is approved for AMA PRA Category 1 Credit(s)™. See final announcement for specific details.

This activity has been planned and implemented in accordance with the Essential Areas and policies of the Accreditation Council for Continuing Medical Education (ACCME) through the joint providership of AKH Inc., Advancing Knowledge in Healthcare and Environmental Health Symposium LLC. AKH Inc., Advancing Knowledge in Healthcare is accredited by the Accreditation Council for Continuing Medical Education to provide continuing medical education for Physicians.

AKH Inc., Advancing Knowledge in Healthcare designates this live activity for a maximum of 18.0 AMA PRA Category 1 Credit(s)™. Physicians should claim only the credit commensurate with the extent of their participation in the activity.

Physician Assistants

NCCPA accepts AMA PRA Category 1 Credit™ from organizations accredited by ACCME.



CME Credit Provided by AKH
Inc., Advancing Knowledge in
Healthcare Physicians



Successful completion of this CME activity, which includes participation in the evaluation component, enables the participant to earn up to 18.0 MOC points in the American Board of Internal Medicine's (ABIM) Maintenance of Certification (MOC) program. Participants will earn MOC points equivalent to the amount of CME credits claimed for the activity. It is the CME activity provider's responsibility to submit participant completion information to ACCME for the purpose of granting ABIM MOC credit.



Conference Schedule

Thursday April 5

4:00 - 8:00 PM Registration Open

Friday April 6

7:00 - 8:00 AM Registration Open

8:00 - 9:00 AM Walter Crinnion ND

9:00 - 10:00 AM William J. Rea MD

10:00 - 11:00 AM Exhibitor Break

11:00 - 12:00 PM Isadora Cuggenheim ND

12:00 - 12:30 PM New Product Presentation

12:30 - 1:30 PM LUNCH BREAK

1:30 - 2:30 PM Paul Anderson ND

2:30 - 3:00 PM New Product Presentation

3:00 - 4:00 PM Exhibitor Break

4:00 - 5:00 PM Marisol Teixeira ND

5:00 - 6:00 PM Joe Pizzorno ND

6:00 - 6:30 PM Q AND A PANEL

6:30 - 8:30 PM EXHIBITOR RECEPTION

Clinical Applications of Sauna Therapy

Intervention with Sauna, Nutrients, and Avoidance: Evidence for Lowering Body Burden
In Exhibit Hall

The Effect of Ozone, Chelation and IV Therapies in Reducing Total Body Burden

Sponsored - Great Plains Laboratory

Lunch on Own

Chelation Therapy: Strategies to Reduce Body Burden

TBA

In Exhibit Hall

Reducing Toxicant Burden and Improving Health with Colonic Irrigations

Toxicants Are Now the Primary Drivers of Chronic Disease

Discussion of Today's Topics

In Exhibit Hall

Saturday April 7

7:00 - 8:00 AM Registration Open

7:00 - 7:45 AM Breakfast Lecture

8:00 - 9:00 AM David Quig PhD

9:00 - 10:00 AM Anne Marie Fine ND

10:00 - 11:00 AM Exhibitor Break

11:00 - 12:00 PM Michael Bauerschmidt MD

12:00 - 12:30 PM New Product Presentation

12:30 - 1:30 PM LUNCH BREAK

1:30 - 2:30 PM Mary Cordaro

2:30 - 3:00 PM New Product Presentation

3:00 - 4:00 PM Exhibitor Break

4:00 - 5:00 PM Jill Carnahan MD

5:00 - 6:00 PM David Quig PhD

Hidden Epidemic: Silent Oral Infections Cause Most Heart Attacks and Breast Cancers by
Thomas E. Levy, MD, JD

More Zebras: Gadolinium, Implant-Related Metals and Uranium

The Clinician's Guide to Avoidance of Everyday Exposures

In Exhibit Hall

Mycotoxins, Mold, Metals and More: Long-term Management of an Environmental Medicine
Patient

Sponsored - Tesseract Medical Research

Buffet Lunch in the Exhibit Hall

Hidden Toxicants in the Home and What to do About Them

TBA

In Exhibit Hall

Strategies for Decreasing Body Burden: Clinical Cases

Phase 3 Detoxification: Strategies for Moving Toxicants Out of the Body



6:00 - 6:30 PM	Q AND A PANEL	Discussion of Today's Topics
6:30 PM	Dinner on your own	
8:00 - 10:00 PM	Pool Party	Live Music / Band & Cocktail Cash Bar

Sunday April 8

7:00 - 7:45 AM	Breakfast Lecture	Sponsored
8:00 - 9:00 AM	Todd Hagobrian PhD	Strategies for BPA: the Ubiquitous Obesogen
9:00 - 10:00 AM	Gregor Reid PhD	Probiotics and Detoxification: Global Perspectives
10:00 - 10:30 AM	New Product Presentation	TBA
10:30 - 12:00 PM	Break/Brunch	Exhibitor Sponsored Buffet Brunch in Foyer
12:00 - 1:00 PM	Jim Adams PhD	Effective Microbiome Rebalancing in ASD Children
1:00 - 2:00 PM	Scott Faber MD	Abnormal Chemical Detoxification in Children with Autism Treated with Clean Room Technology: A Tale of Two Studies
2:00 - 2:15 PM	Bathroom Break	
2:15 - 3:15 PM	Lyn Patrick ND	Decreasing a Ubiquitous Toxicant Load: Organophosphate Pesticides
3:15 - 3:45 PM	Q AND A PANEL	Discussion of Today's Topics
3:45 - 4:00 PM	Bathroom Break	
4:00 - 5:00 PM	Case Mentoring	Case Mentoring with Lyn Patrick & Walter Crumion
5:00 PM	Conference Ends	



Gregor Reid, PhD



Willam J Rea, MD

Gregor Reid, BSc Hons, Ph D, MBA, ARM CCM, Dr HS, FCAHS, FRSC Professor of Microbiology and Immunology, and Surgery at The University of Western Ontario and Endowed Chair in Human Microbiome and Probiotics at the Lawson Health Research Institute. Inductee into the Canadian Academy of Health Sciences and awarded an Honorary Doctorate in Biology from Orebro University in Sweden. My research primarily focuses on beneficial microbes and I have developed novel probiotic therapies used by several million people around the world. I have held 28 patents, published 509 peer-reviewed papers including in Science, Nature, Lancet and JAMA, and given >600 talks in 54 countries. I helped set up Western Heads East that has established community kitchens in Tanzania, Kenya, and through partnership with Yoba-for-Life in Uganda in which local mothers produce probiotic yogurt for over 120,000 people. I Chaired the United Nations - World Health Organization Expert Panel and Working Group on Probiotics, and have been President of the International Scientific Association for Probiotics and Prebiotics. In 2010, I received the Hellmuth Prize, the highest research honour conferred by The University of Western Ontario, and in 2011, the Distinguished Alumni Award presented by Massey University. In 2016 I was inducted into the Royal Society of Canada.

Jill C. Carnahan, MD, ABFM, ABIHM, IFMCP

Jill Carnahan, M.D., completed her residency at the University of Illinois Program in Family Medicine at Methodist Medical Center. In 2008 she was voted by faculty to receive the Resident Teacher of the Year award and elected to Central Illinois 40 Leaders Under 40. She received her medical degree from Loyola University Stritch School of Medicine in Chicago and her Bachelor of Science degree in Bio-Engineering at the University of Illinois in Champaign-Urbana. She is dually board-certified in Family Medicine and Integrative Holistic Medicine. In 2008, Dr. Carnahan's vision for health and healing resulted in the creation of Methodist Center for Integrative Medicine in Peoria, IL, where she served as the Medical Director for 2 years. In 2010, she founded Flatiron Functional Medicine in Boulder, Colorado where she practices functional medicine with medical partner, Dr. Robert Rountree, author and expert speaker. Dr. Carnahan is also 10-year survivor of breast cancer and Crohn's disease and passionate about teaching patients how to "live well" and thrive in the midst of complex and chronic illness. She is also committed to teaching other physicians how to address underlying cause of illness rather than just treating symptoms through the principles of functional medicine. She is a prolific writer, speaker, and loves to infuse others with her passion for health & healing! If you would like to read more about Dr. Carnahan, visit www.drcarnahan.com.

William J. Rea, M.D., F.A.C.S., F.A.A.E.M., founder of the Environmental Health Center - Dallas (EHC-D), is a thoracic, cardiovascular and general surgeon with an added interest in the environmental aspects of health and disease. Dr. Rea is currently director of this highly specialized Dallas-based medical facility.

Author of seven medical textbooks, Chemical Sensitivity, V. 1-4, Reversibility of Chronic Degenerative Disease and Hypersensitivity, V. 1-3, V. 4-5 IN PRESS, and the pictorial book, Optimum Environments for Optimum Health and Creativity as well as co-authoring Your Home, Your Health and Well-Being. Dr. Rea has published more than 150 research papers related to the topic of thoracic and cardiovascular surgery as well as that of environmental medicine.

Dr. Rea held the First World Professorial Chair of Environmental Medicine at the University of Surrey, Guildford, England from 1988 - 1998.

Dr. Rea has treated over 30,000 patients with chemical sensitivity and chronic degenerative disease. He has helped create numerous environmental units throughout the world including Mexico, Brazil, Japan, China, Australia, England, Spain, Italy, and Germany. The principles of environmental medicine are used and taught in these centers. He has trained hundreds of physicians on the facts and principles of environmental medicine.



Paul Anderson, ND

Paul Anderson, N.M.D., is CEO of the Anderson Medical Group which includes the clinic Advanced Medical Therapies, a state of the art medical center providing fully compliant IV, Hyperbaric and Mild Hyperthermia therapies. He brings over four decades of medical training and experience together to allow his clinical and educational presence to grow and serve patients and physicians in the best way possible.

He is a well-known continuing education presenter in the allopathic, naturopathic, acupuncture and nursing CME arenas. His areas of specialty are in complex clinical medicine, intravenous and injection medicine, oncology and genomics.

Dr. Anderson is former Chief of IV (intravenous therapy) Services for Baylor Oncology Research Center and a past Professor at Baylor University where he continues to consult in research design and holds the rank of Full Professor. He is a graduate of



Mary Cordaro

Mary Cordaro is a healthy building, home and indoor environmental consultant, a certified Baubiologist and owner of Mary Cordaro, Inc. She works to ensure that what your house is built out of, what its interiors are comprised of, and what products might be contained in it, are all as healthy as possible. For over 25 years, she has been helping create safe and healing homes for new and prospective parents who want baby to begin life in a healthy environment, and people of all ages who simply desire healthy, healing homes. She also helps create healthy living spaces for children and adults with health conditions, or who suffer from allergies, asthma, mold, chemical and electrical sensitivities.

Mary provides consulting services around the country to homeowners, architects, interior designers, contractors and medical doctors. Her collaborative approach is unique, synthesizing both the German



James B. Adams, PhD

James B. Adams, Ph.D. is the Director of the Autism/Asperger's Research Program at Arizona State University. His research focuses on the medical causes of autism and how to treat and prevent it including the areas of nutrition (vitamins/minerals, essential fatty acids, carnitine, digestive enzymes, special diets), oxidative stress, gut problems, gut bacteria, toxic metals, and seizures. He has published over 150 peer-reviewed scientific articles, including 35 related to autism. He is also the President of the Autism Society of Greater Phoenix, the President of the Autism Nutrition Research Center, the co-leader of the Scientific Advisory Committee of the Autism Research Institute, and chair of the Scientific Advisory Board of the Neurological Health Foundation. He has an adult daughter with autism.

EXHIBIT C

Transcript pages, May 1, 2017 testimony of Dr. Samuel Milham
Phoenix, Arizona

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PA PUBLIC UTILITY COMMISSION
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BEFORE THE ARIZONA CORPORATION COMMISSION

IN THE MATTER OF THE APPLICATION OF) DOCKET NO.
ARIZONA PUBLIC SERVICE COMPANY FOR) E-01345A-16-0036
A HEARING TO DETERMINE THE FAIR)
VALUE OF THE UTILITY PROPERTY OF)
THE COMPANY FOR RATEMAKING)
PURPOSES, TO FIX A JUST AND)
REASONABLE RATE OF RETURN THEREON,)
TO APPROVE RATE SCHEDULES DESIGNED)
TO DEVELOP SUCH RETURN.)

_____) DOCKET NO.
IN THE MATTER OF FUEL AND PURCHASED) E-01345A-16-0123
POWER PROCUREMENT AUDITS FOR)
ARIZONA PUBLIC SERVICE COMPANY.)
_____)

At: Phoenix, Arizona
Date: May 1, 2017
Filed: May 3, 2017

EXCERPT OF PROCEEDINGS

Testimony of Samuel Milham

COASH & COASH, INC.
Court Reporting, Video & Videoconferencing
1802 N. 7th Street, Phoenix, AZ 85006
602-258-1440 staff@coashandcoash.com

By: Colette E. Ross, CR
Certified Reporter
Certificate No. 50658

1 ACALJ JIBILIAN: If he will come to the stand.
2 This is the witness stand. And the court
3 reporter will swear you in when you get up here and get
4 settled in.

5
6 SAMUEL MILHAM,
7 called as a witness on behalf of Warren Woodward, having
8 been first duly sworn by the Certified Reporter to speak
9 the truth and nothing but the truth, was examined and
10 testified as follows:

11
12 DIRECT EXAMINATION

13 BY MR. WOODWARD:

14 Q. Dr. Milham, please state your full name,
15 address, and occupation.

16 A. Samuel Milham. One more time.

17 Q. Your address and occupation, please.

18 A. 2318 Gravelly Beach Loop Northwest, Olympia,
19 Washington 98520. I am a physician, epidemiologist.

20 Q. Thank you.

21 And what is your professional and educational
22 background, please?

23 A. Well, I went to public -- born and brought up in
24 New York, upstate New York. Went to public schools.
25 Won a scholarship to Union College, New York State

EXHIBIT D

Printout of page from Dr. Talmor's website advertising a workshop to be taught by him in Michigan in October 2017

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PA PUBLIC UTILITY COMMISSION
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Dr Talmor's Energy and Healing Workshops

Location: Linda Sinkule's
1212 Wines Drive
Ann Arbor, Michigan 48103

Friday, October 13th, 1:00PM to 5:00PM Consciousness Healing
Friday, October 13th, 6:00PM to 9:00PM The Nutripuncture Way of Healing
Saturday, October 14th, 9:00 AM to 12:00PM Consciousness Healing
Saturday, October 14th, 1:00PM to 4:00PM Finding Balance with Biosyntonie
Bring the food that you require during the workshops.

- The Complete Workshop provides each of 15 participants 3 workshops. \$100 prepaid.
- The Consciousness Workshop will be given twice on Friday.
- Each session will accommodate up to 15 people.
- One session or two prepaid is \$40 per session.
- Fee for the Complete Workshop is \$120 paid at the door.
- One session or two paid at the door are \$50 for each.
- Space is limited to 15 participants, so please call soon.

For registration please call Dr. Talmor @ 352-377-0015

- Sunday, 1:00PM - 6:00PM Call Dr. Talmor to schedule your appointment. (4 sessions available)
- Monday, 9:00AM - 3:00PM Call Dr. Talmor to schedule your appointment. (4 sessions available)

[Click Here for more Information](#)

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- Detoxification with herbs and supplements
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- Stress Management and Self-Help Tools
- Pyscho-Kinesiology
- Holistic pain management
- Personalized Wellness programs
- Personalized prevention programs
- Personalized Healing Program
- How to deal with the emotional and mental aspects of illness and prevention of illness

More Info...



EXHIBIT E

Dr. Rea's January 29, 2013 prefiled written testimony before the Maine Public
Utility Commission

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PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

**PRE-FILED TESTIMONY
OF WILLIAM J. REA, M.D.
~~MPUC Docket No. 2011-00262~~**

1 **Q. Please state your name and business address.**

2 A. My name is William J. Rea, M.D. My address is:
3 Environmental Health Center
4 8345 Walnut Hill Lane, Suite 220
5 Dallas, TX 75231

6 **Q. Briefly state your occupation, educational background, current employment,**
7 **and professional experience.**

8 A. I currently serve as President of the Environmental Health Center, in Dallas, Texas.

9 I graduated from Otterbein College in Westerville, Ohio, and Ohio State
10 University College of Medicine in Columbus, Ohio. I then completed a rotating
11 internship at Parkland Memorial Hospital in Dallas, Texas. I held a general surgery
12 residency from 1963-67 and a cardiovascular surgery fellowship and residency from
13 1967-69 with The University of Texas Southwestern Medical School system, which
14 includes Parkland Memorial Hospital, Baylor Medical Center, Veteran's Hospital and
15 Children's Medical Center. I was also part of the team that treated Governor Connelly
16 when President Kennedy was assassinated.

17 From 1969 – 1972, I was assistant professor of cardiovascular surgery at the
18 University of Texas S.W. Medical School; from 1984-85 I was Chief of
19 Cardiovascular Surgery at the Veteran's Hospital. I held the position of adjunct
20 professor of environmental sciences and mathematics at the University of North
21 Texas, while from 1972-82 I acted as clinical associate professor of thoracic surgery
22 at The University of Texas Southwestern Medical School. I held the First World

1 Professorial Chair of Environmental Medicine at the University of Surrey, Guildford,
2 England from 1988 – 1998. I also served as adjunct professor of psychology and
3 guest lecturer at North Texas State University.

4 **Q. Are you a member of any professional organizations? If so, please list.**

5 A. I currently serve on the board and am president of the American Environmental
6 Health Foundation, vice president of the American Board of Environmental Medicine
7 and previously served on the board of the American Academy of Environmental
8 Medicine. I have also served on the Science Advisory Board for the U.S.
9 Environmental Protection Agency, on the Research Committee for the American
10 Academy of Otolaryngic Allergy and on the Committee on Aspects of
11 Cardiovascular, Endocrine and Autoimmune Diseases of the American College of
12 Allergists, Committee on Immunotoxicology for the Office of Technology
13 Assessment and on the panel on Chemical Sensitivity of the National Academy of
14 Sciences. I am a fellow of the American College of Surgeons, the American
15 Academy of Environmental Medicine, the American College of Allergists, the
16 American College of Preventive Medicine, the American College of Nutrition, and
17 the Royal Society of Medicine. I was awarded the Jonathan Forman Gold Medal
18 Award in 1987 for outstanding research in environmental medicine, The Herbert J.
19 Rinkle Award in 1993 for outstanding teaching, and the 1998 Service Award, all by
20 the American Academy of Environmental Medicine. I was named Outstanding
21 Alumnus by Otterbein College in 1991. Other awards include the Mountain Valley
22 Water Hall of Fame in 1987 for research in water and health, the Special
23 Achievement Award by Otterbein College in 1991, the Distinguished Pioneers in

1 Alternative Medicine Award by the Foundation for the Advancement of Innovative
2 Medicine Education Fund in 1994, the Gold Star Award by the International
3 Biographical Center in 1997, Five Hundred Leaders of Influence Award in 1997,
4 Who's Who in the South and Southwest in 1997, The Twentieth Century Award for
5 Achievement in 1997, the Dor W. Brown, Jr., M.D. Lectureship Award by the Pan
6 American Allergy Society and the O. Spurgeon English Humanitarian Award by
7 Temple University in 2002.

8 **Q. Have you authored any papers or journal articles?**

9 A. I have authored five medical textbooks, *Chemical Sensitivity* (V. 1-4), *Reversibility of*
10 *Chronic Degenerative Disease and Hypersensitivity*, V. 1: *Regulating Mechanisms of*
11 *Chemical Sensitivity*, *Optimum Environments for Optimum Health and Creativity*, and
12 co-author of *Your Home, Your Health and Well-Being*, more than 150 peer reviewed
13 research papers related to the topic of thoracic and cardiovascular surgery as well as
14 that of environmental medicine. A full list is shown on my *curriculum vitae* attached
15 as Exhibit A.

16 **Q. Briefly describe your work and experience related to the study of**
17 **electromagnetic fields and radio frequency waves in the 30 MHz to 300 GHz**
18 **range ("RF"), and about their potential effects on humans. Please describe the**
19 **study you conducted on electromagnetic hypersensitivity in 1991 and the results.**

20 A. The 1991 study was a multiphase study that was performed to find an effective
21 method to evaluate electromagnetic field (EMF) sensitivity of patients. See Rea WJ,
22 Yagin P, Fenyves EJ, Sujisawa I, Samadi N, Ross GH. Electromagnetic field
23 sensitivity. *J Bioelect* 10, 241-256, 1991 (attached as Exhibit B). The first phase

1 developed criteria for controlled testing using an environment low in chemical,
2 particulate, and EMF pollution. Monitoring devices were used in an effort to ensure
3 that extraneous EMF would not interfere with the tests. A second phase involved a
4 single-blind challenge of 100 patients who complained of EMF sensitivity to a series
5 of fields ranging from 0 to 5 MHz in frequency, plus 5 blank challenges. Twenty-five
6 patients were found who were sensitive to the fields, but did not react to the blanks.
7 These were compared in the third phase to 25 healthy naïve volunteer controls. None
8 of the volunteers reacted to any challenge, active or blank, but 16 of the EMF-
9 sensitive patients (64%) had positive signs and symptoms scores, plus autonomic
10 nervous system changes. In the fourth phase, the 16 EMF-sensitive patients were
11 rechallenged twice to the frequencies to which they were most sensitive during the
12 previous challenge. The active frequency was found to be positive in 100% of the
13 challenges, while all of the placebo tests were negative. We concluded that this study
14 gives strong evidence that electromagnetic field sensitivity exists, and can be elicited
15 under environmentally controlled conditions. Since then we have studied several
16 hundred patients who complained of EMF sensitivity and have found that indeed they
17 were.

18 **Q. Have you reviewed the joint testimony of William H. Bailey, Ph.D. and Yakov**
19 **Shkolnikov, Ph.D. (“Exponent”), dated September 19, 2012?**

20 **A. Yes.**

21 **Q. Do you agree with Exponent’s critique of your 1991 study? Exponent states:**
22 **“the claim that this study is a double blind study is not wholly accurate (WHO,**
23 **2007).” p. 42**

1 A. The screening tests were not double blind because you cannot screen double blind.
2 However, the group for the final tests for EMF was not only double blind but were
3 done two times. Therefore, the findings were highly significant for the presence of
4 EMF in this group of patients.

5 Smith, Monro, Choy have several studies on the existence of EMF sensitivity
6 which would confirm our observations (*See Exhibit B, references 1-12*). The
7 literature is very extensive on EMF sensitivity. See also, McCarty DE, Carrubba S,
8 Chesson AL, Frilor C, Gonzalez-Toledo E, Marino AA. 2011. Electromagnetic
9 hypersensitivity: Evidence for a novel neurological syndrome. *Internat J Neurosci*
10 121: 670-676. As a cardiac surgeon, I have seen the benefits and adverse reactions to
11 EMF in thousands of patients. We have shocked hearts or used pacemakers which are
12 electronic sources bringing the patient back to life.

13 **Q. Are you familiar with other research studies and writings on the subject?**
14 **Briefly describe the body of research and published literature on the subject of**
15 **which you are familiar.**

16 A. Becker's studies on the Electromagnetic Healing of bones and tissues⁽¹⁾; Marino's
17 studies on the EMF healing of tissue⁽¹⁻⁹⁾; Smith's⁽¹⁰⁾ and Monro's⁽¹¹⁾ studies on the
18 presence of EMF sensitivity; Havas studies on EMF⁽¹²⁻¹⁷⁾.

19 **Q. Did some of these studies involve exposure to RF in or near the 2.4 GHz range?**

20 A. Yes.

21 **Q. Exponent testified that there is no scientific basis for concluding that EHS may**
22 **be caused by exposure to electromagnetic radiation. Here are some of their**

1 **statements: “A number of well-conducted laboratory studies show no relation**
2 **between the health symptoms experienced by some individuals and RF EMF**
3 **exposure” (p. 29) . . . “that electromagnetic field hypersensitivity had not been**
4 **documented as reproducible as asserted by AAEM and the claim for improved**
5 **ability to detect fields was contradicted by a meta-analysis of the available**
6 **literature and the WHO’s assessment of research on this topic.” (p. 35). Do you**
7 **agree with these assertions and opinions?**

8 A. No. Unfortunately, these studies as I understand, were not performed on sensitive
9 humans but on animals.

10 These assertions by Exponent witnesses are not true. If you have properly
11 environmentally controlled unpolluted rooms, you can reproduce EMF sensitivity.
12 The exponents show a gross ignorance of the physiology of EMF. It is well known in
13 the field of cardiovascular surgery the difference between life and death and the
14 electromagnetics. I have shocked multiple patients back to life using small amounts
15 of electricity. Many patients respond to heavy shocks, others to extremely small
16 shocks. This observation holds for the spectrum of electrosensitivity.

17 **Q. Are there any plausible scientific explanations for a causal link between EHS**
18 **and exposure to electromagnetic radiation?**

19 A. Yes, the body runs on electromagnetic waves. This is the way it communicates.
20 Most physicians know about EEG, brain waves, EMG muscle and nerve conduction
21 and EKG cardiac waves. This is common knowledge in our society. Extra cellular
22 barrier regulates the flow of ions Na^+ , K^+ , and Ca^{++} into and out of the cell. Influx of

1 Ca⁺⁺ into the cell coupled with protein kinase with phosphorylation increase
2 sensitivity to 1000 times⁽¹⁸⁾.

3 **Q. Are there any peer-reviewed studies that would support such a causal link or**
4 **mechanism?**

5 A. Yes! See attached list of studies.

6 **Q. Please describe your work with people who report EHS symptoms? Have you**
7 **had patients who report EHS symptoms related to smart meters?**

8 A. Yes! We have had many people who report their symptoms after the smart meters
9 have been installed. These are wide ranging from fibromyalgia to pain syndromes
10 and confusion, difficulty thinking, short term memory loss, and severe fatigue. Some
11 have an increase in heart arrhythmias, muscle spasms, severe numbness and tingling
12 in peripheral nerves. Many of my patients report that they began experiencing
13 symptoms before they were aware that a smart meter had been installed.

14 **Q. How do you confirm that patients' symptoms are related to EMF sensitivity?**

15 A. By conducting the EMF challenge testing developed in our 1991 study.

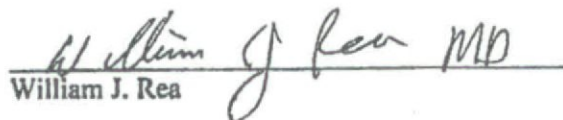
16 **Q. What treatments do you recommend for patients with EMF sensitivities and how**
17 **do the patients respond to treatment?**

18 A. At the present time, treatment has been avoidance of the smart meters, vitamin and
19 mineral supplementation, mineral intradermal neutralization. The high percentage of
20 patients experiencing positive results confirms that the diagnosis and treatment are
21 effective.

22 **Q. Have objective guidelines been developed for diagnosing and treating people**
23 **with EHS and other EMF related health problems?**

- 1 A. Objective guidelines have been developed for diagnosing people's sensitive to EMF,
2 including the following.
- 3 1. History of symptoms from exposures to EMF.
 - 4 2. Positive findings physical exam.
 - 5 3. Symptoms away from EMF generators.
 - 6 4. Reproduction of symptoms and signs on controlled EMF challenge.
- 7 **Q. In your opinion, is there a scientific basis for concluding that RF emissions from**
8 **smart meters could trigger adverse symptoms in people who have developed**
9 **EHS?**
- 10 A. Yes
- 11 **Q. In your opinion, is there a scientific basis for concluding that exposure to the**
12 **emissions from the smart meters over time could contribute to the development**
13 **of EHS and other adverse health effects, particularly for children, the elderly**
14 **and others who may be more susceptible, such as persons with immune**
15 **deficiencies?**
- 16 A. Yes! People with immune irregularities such as low T-cells, low gamma globulins
17 have been seen to not tolerate EMF and nerve sensitization to sensory nerves.
- 18 **Q. Based on your knowledge of RF and smart meter technology, would you want an**
19 **RF-emitting smart meter on your home?**
- 20 A. No.

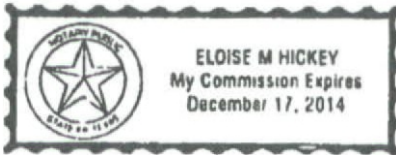
Dated this 29 day of January, 2013.


William J. Rea

STATE OF TEXAS
DALLAS, ss:

January 29, 2013

Personally appeared the above-named William J. Rea, M.D., and stated under oath that the foregoing Affidavit made by him is true and based upon his own personal knowledge, information or belief, and so far as upon information and belief, he believes the information to be true. Before me,



Eloise M. Hickey
Notary Public ~~Attorney-at-Law~~
Eloise M. Hickey
Name Typed or Printed
My Commission Expires: 12/17/14

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BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

FEB 16 2018

Alexia McKnight

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:

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

v.

Docket No. C-2017-2621057


PECO Energy Company

CERTIFICATE OF SERVICE

I, Ward L. Smith hereby certify that on February 13, 2018, I served a copy of PECO Energy Company's *Motion to Require in-Person Testimony*, in the above matter, upon all interested parties via email and overnight delivery to:

Alexia McKnight
258 Heyburn Road
Chadds Ford, PA 19317
Alexia.mcknight@gmail.com

Dated: February 16, 2018



Ward L. Smith
Counsel for PECO Energy Company
2301 Market Street, S23-1
Philadelphia, PA 19103
Phone: (215) 841-6863
Fax: 215.568.3389
Ward.Smith@exeloncorp.com

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