

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

<b>ANN V. SHEEHAN</b>	:	
	:	
<b>v.</b>	:	<b>Docket No. C-2017-2630406</b>
<b>WEST PENN POWER COMPANY</b>	:	

**MOTION TO COMPEL AND FOR EXTENSION OF TIME**

Now comes the Complainant Ann V. Sheehan, in the above captioned case, and respectfully requests that the court require West Penn Power to reply to all Complainant's interrogatory Set I questions, which they failed to answer, thus requiring the parties to continue the matter set for March 7, 2018.

In support of this request, Complainant states the following:

1. Complainant e-filed her Formal Complaint against West Penn Power on October 23, 2017.
2. West Penn Power filed its Preliminary Objections and New Matter to Complainant's Formal Complaint on November 16, 2017 via US Mail. This document should have been e-filed and not sent via US Mail.
3. Complainant e-filed and emailed her answer to Preliminary Objections and New Matter on November 27, 2017.
4. Complainant served via e-file and email, Interrogatory Set I questions on West Penn Power on February 2, 2018, with objections due on February 12<sup>th</sup> and answers due on February 22<sup>th</sup>.

5. West Penn Power failed to file objections to any of Complainant's Interrogatory Set I questions.

7. West Penn Power mailed, rather than emailing its Interrogatory Set I to Complainant, postmarked January 19, 2018, and received by Complainant on January 22, 2018.

8. Complainant received a copy of West Penn Power's Interrogatory Set I on January 22, 2018.

9. On January 23, 2018, Complainant requested of Your Honor that she be permitted an additional 3 days to answer West Penn Power's Interrogatory Set 1 because West Penn Power neglected to e-file its Interrogatory Set I questions to her, and deprived her of 3 days to answer its Interrogatories under the PUC rules for Formal Complaints.

6. West Penn Power attorneys subsequently asked for additional time to answer Complainant's Interrogatory Set I on February 6, 2018. In a later email of February 10, 2018, the attorneys reveal this is because they would be out of the country on the due date.

7. Complainant agreed to allow West Penn Power additional time to answer her Interrogatory Set I, with West Penn Power agreeing that answers would be due by both parties on February 28<sup>th</sup>.

10. Complainant answered all of West Penn Power's interrogatory questions via email by February 28, but West Penn Power failed to answer many crucial Interrogatory Set I Complainant questions that go to the heart of Complainant's Formal Complaint, in their answers to Complainant's Interrogatory Set I, which they emailed to Complainant on February the 28<sup>th</sup>; instead West Penn Power stated that it objected to answering many of the questions.

11. This activity of West Penn Power in objecting to questions in Complainant's Interrogatory Set I, returned to Complainant on February the 28<sup>th</sup>, was past the due date for objections by 16 days. This being the rule of law in PUC Formal Complaint regulations

12. Complainant is seeking sanctions on West Penn Power, if the Pennsylvania Public Utilities Commission has sanctions, again the utility.

13. The Complainant cannot possibly come to a meeting with West Penn Power, which has chosen, in defiance of the law, to supply her insufficient and scanty information regarding West Penn Power's violations of Section 1501 as pertains to Complainant.

13. In addition, Complainant answered all of the interrogatories put to her by West Penn Power.

15. West Penn Power emailed Complainant that Your Honor wishes that the parties meet before scheduling a formal hearing.

16. While Complainant finds a meeting with West Penn Power before scheduling a formal hearing and taking up the Court's time to be a laudable goal, West Penn Power must adhere to the PUC rules and regulations regarding Formal Complaint procedures.

17. West Penn Power attorneys are expected to know the PUC rules and regulations and abide by them.

18. To date, Complainant, who is acting pro se, is not convinced that West Penn Power attorneys believe that the PUC rules and regulations apply to their conduct towards her in her Formal Complaint action

19. Complainant has been mightily inconvenienced by West Penn Power's flagrant disregard for its obligations in this instance, having already arranged to take the day off from work, in anticipation of a productive conference.

20. Without receiving well ahead of time, allowing her sufficient time to study all of West Penn Power's full and complete answers to her Interrogatory Set I, Complainant cannot participate meaningfully in any conference with West Penn Power.

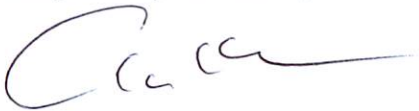
21. Complainant humbly requests the conference be postponed until West Penn Power has answered all of Complainant's interrogatory Set I questions, which they have failed to do and have failed to object to in a timely manner, and so that the conference meeting be rescheduled at the convenience of the Complainant after she receives answers to all of Complainant's Interrogatory Set I questions..

WHEREFORE, the Complainant requests that Your Honor grant her Motion to Compel and related request for a continuance of the conference.

PROPOSED ORDER:

West Penn Power is required to answer all questions posed in Complainant's Interrogatory Set I within ten days of this Order, and the conference originally scheduled for March 7, 2018, is hereby continued until mutually rescheduled by the parties.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Ann v. Sheehan', with a long horizontal flourish extending to the right.

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ATTACHMENT:

COMPLAINANT'S INTERROGATORY SET I