

Response to PECO's Response to the McKnight Omnibus Request
Docket No. C-2017-2621057

Your Honor,

In Mr. Smith's response yesterday, he repeatedly emphasized the importance of meeting timely deadlines for this case. I'd remind him that his answers to my Interrogatories Set I were 7 days late, without any explanation or justification. Thus, his being a week later contributed to his very concern for having less time to respond to my response.

Dr. Milham was included on our expert witness list, submitted on time (February 13, 2018), specifically to bring testimony to the health effects of 'dirty electricity' (ie poor power quality)—a subject of his expertise for several decades. Mr. Bathgate was identified as a witness only after we finally received PECO's answers to our Interrogatories Set I on March 1, which indicated PECO did not measure any harmonics or transients from their smart meters, yet testified to the fact that these are theoretically inconsequential. We have learned that this is not true for other smart meters, including the Landis + Gyr meter that had been previously deployed twice on this house. For our court hearing, we felt it was most appropriate to present evidence on the specific meter relevant to our case now (Aclara meter) and we successfully isolated Mr. Bathgate as an individual qualified to perform this test. It took some time to find, order, and have delivered the appropriate meter to run this experiment before our hearing. This test is currently expected to be run this upcoming weekend, which we hope will be in time to submit the results to Mr. Smith on March 27, 2018. Mr. Bathgate's credentials will be forthcoming as well.

The main reason I need Mr. Russell Brocato to testify was also in response to PECO's interrogatories, which again we did not receive from Mr. Smith until March 1, 2018. In Mr. Bryan Uber's answers, it was still clear that I needed to address his errors regarding PECO power quality and smart meter events that have occurred on this property throughout 2016 and 2017. Mr. Brocato will be able to clarify the facts for the record. It is important to emphasize that the stray voltage at this property that Mr. Brocato was involved in, although certainly a type of power quality problem, is not the same power quality problem I am alleging from the smart meter. The issue addressed by Mr. Bathgate and Dr. Milham is predominantly the dirty electricity (harmonics and transients) from the smart meter, not stray voltage. Mr. Brocato will not be used as an expert witness, only a factual witness. I choose to subpoena him simply so I have no concern of his attendance. His experience at PECO regarding power quality problems in farm animals would be an additional method of introducing well known health effects from poor power quality to the court as allowed by Your Honor.

Regarding my husband, Dr. Lawrence McKnight, we would like clarification of your expectations for him to appropriately deliver his testimony. He is my husband, having witnessed the problems I had from the smart meter. He is also a physician with experience in informatics. We cannot remove these credentials from his being. Thus, his testimony as a complainant will have a strong medical component, particularly in regards to reviewing, understanding, interpreting, and binding the medical literature to patients. We consulted with a lawyer for structural guidance and procedural expectations before the expert witness deadline of February 13, and we were told to provide Larry's testimony as a complainant, and specifically not to include him as an expert witness. Going pro se in this case, we are not familiar with the nuances

of all the rules regarding expert witnesses vs. factual witnesses vs. hearsay vs. a complainant's testimony. If that was incorrect guidance, please inform us how best he can testify. If Mr. Smith would like, we can submit to him by the end of the day Larry's CV and his expected testimony. We would be happy to discuss any other details by phone so that all of us can have a fair and balanced hearing in April.

Lastly, as for the schedule, I currently propose the following:

Day 1, My testimony, then Larry and Dr. Milham.

Day 2 Mr. Pritchard, Mr. Uber, Mr. Brocato, Mr. Bathgate

Day 3 Dr. Israel, Dr. Davis, Dr. Rea

Thank you very much,



Alexia McKnight
Lawrence McKnight

