

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

ANN V. SHEEHAN :
 :
 v. : **Docket No. C-2017-2630406**
WEST PENN POWER COMPANY :

MOTION FOR IN-PERSON HEARING AND FOR EXTENSION OF TIME

Now comes the Complainant Ann V. Sheehan, in the above captioned case, and respectfully requests that the telephone hearing scheduled for June 7, 2018 be postponed for late August or September. The Complainant's daughter is pregnant with her first child and is due the second week of June.

The complainant also requests this be a two day in-person hearing in Harrisburg. There are several witnesses, including others negatively affected by RF and smart meters, physicians and expert witnesses. In addition, several employees of First Energy/West Penn Power will need to be subpoenaed as to their knowledge of Complainants EHS and health needs.

It is further requested that the Judge assigned to the case in Harrisburg rule on Complainants interrogatory motion (Interrogatory Set I) of March 4, 2018 as soon as possible. As to this issue,

Complainant served via e-file and email, Interrogatory Set I questions on West Penn Power on February 2, 2018, with objections due on February 12th and answers due on February 22th.

It was later mutually agreed upon that both parties should return interrogatories on February 28th.

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

West Penn Power also 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^h; instead West Penn Power stated in its answers that it objected to answering many of the questions.

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

There is now an Interrogatory Set II, served via email on February 26, 2018, with answers due by March 15th and objections due by March 5th. Once again, West Penn Power sent their answers on March 19th, four days past due, with objections in the body of the document. No objections were filed by the due date of March 5th.

Complainant humbly requests the hearing be postponed until West Penn Power has answered all of Complainant's interrogatory Set I and Set II questions, which they have failed to do and have failed to object to in a timely manner in both instances. And that West Penn Power be required to complete all interrogatory answers expeditiously, greatly in advance of any scheduled in person hearing in Harrisburg, so that I can secure expert testimony in my case who will rely on West Penn Power's answers to my interrogatories in formulating their expert witness testimony.

Said Judge will need to issue subpoenas to the following employees, who are: Shawn M. Hindman, Engineer IV/West Penn Power, mhindman@firstenergycorp.com; Jeffrey A. McDonald, Supervisor of Regional Engineering, West Penn Power, jmcdon1@firstenergycorp.com; Randy Salyer, Manager of Smart Meter Deployment, salyerr@firstenergycorp.com; David Kline, Manager of External Affairs, First Energy, dkline@firstenergycorp.com; Charles E. Anna, canna@firstenergycorp.com; James Healy, West Penn Manager Operations Services (Waynesboro Region), jhealy@firstenergycorp.com; Dave Bedard, dbedard@firstenergycorp.com; Tom P. Cuddy, tcuddy@firstenergycorp.com; Denise K. McDevitt.

WHEREFORE, the Complainant requests that Your Honor grant her Motion for an In-Person Hearing in Harrisburg and related request for an Extension of Time.

PROPOSED ORDER:

That the telephone hearing scheduled for June 7, 2018 be rescheduled as an in-person hearing in Harrisburg at a later date of late August or September, 2018.

It is further requested that the Judge assigned to the case in Harrisburg rule on Complainant's Motion to Compel (Interrogatory Set I) of March 5, 2018 as soon as possible.

And the Judge furthermore require West Penn Power to fully answer all Interrogatory Set I and Set II questions posed within 10 days of this Order.

Respectfully submitted,

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