

August 20, 2018

VIA EMAIL

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

RE: Ann V. Sheehan v. West Penn Power/First Energy Docket No. C-20172630406

Dear Ms. Chiavetta,

Attached, please find the Amended Motion to Compel and Extension of Time in the matter of Ann V. Sheehan v. West Penn Power/First Energy, with copies to the individuals listed below in accordance with the requirements of 52 Pa. Code 1.54 (relating to service by a participant).

This document has been served as indicated within the Certificate of Service to the individuals listed below.

Very truly yours,



Ann V. Sheehan

First Energy Service Company (original filing to Lepkoski and Giesler)
Lauren M. Lepkoski, Esquire
Tori Giesler, Esquire
Teresa Herrold, Esquire
2800 Pottsville Pike
P.O. Box 16001
Reading, PA 19612-6001
llepkoski@firstenergycorp.com
tgiesler@firstenergycorp.com
therrold@firstenergycorp.com

Cc: The Honorable Judge Jeffrey Watson
Public Utility Commission (cover letter and Certificate)

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Ann V. Sheehan v. West Penn Power Company/First Energy

Docket No. C-2017-2630406

Amended Motion to Compel

NOTICE TO PLEAD

Pursuant to 52 Pa. Code 5.61, you are hereby notified that, within 20 days, you must answer the enclosed Motion to Compel and for Extension of Time (refiled). You must provide a full copy of any objection or answer to Ann V. Sheehan. When you serve objections or answers, you may not file the substance of such objection or answer with the Commission or the Administrative Law Judge; however, you must file a certificate of service with the Secretary of the Pennsylvania Public Utility Commission with the Administrative Law Judge, evidencing the service of such answers on Ann V. Sheehan.

File with:

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

With a copy to:

Ann V. Sheehan
4986 Carmack Court
Mercersburg, PA 17236

Dated: August 20, 2018



Ann V. Sheehan

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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

Dated 8-20-18

AMENDED 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 and Set II questions, which they failed to answer, thus requiring the parties to continue the telephone conference of September 19, 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 12th and answers due on February 22th.
5. West Penn Power failed to file objections to any of Complainant's Interrogatory Set I questions.
6. 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.
7. Complainant received a copy of West Penn Power's Interrogatory Set I on January 22, 2018.
8. 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.
9. 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.
10. 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 28th.
11. 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 28th; instead West Penn Power stated within its answers that it objected to answering many of the questions.

12. This activity of West Penn Power in objecting to questions within 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

13. Complainant served via e-file and email, Interrogatory Set II questions on West Penn Power on February 26, 2018, with objections due on March 5th and answers due on March 15th.

14. West Penn Power failed to answer many crucial Interrogatory Set II Complainant questions that go to the heart of Complainant's Formal Complaint, in their answers to Complainant's Interrogatory Set II, which they emailed to Complainant on March 19, 2018, which was 4 days beyond the response time; instead West Penn Power stated within its answers that it objected to answering many of the questions.

15. Complainant emailed Additional Counts concerning billing errors on March 19, 2018, which were attached to the original formal complaint, as per instructions from the PUC.

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

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

18. 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.

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

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

21. 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.

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

23. 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.

24. Complainant has been mightily inconvenienced by West Penn Power's flagrant disregard for its obligations in this instance, having already arranged to be available in anticipation of a productive conference.

25. 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 questions and Interrogatory Set II questions, Complainant cannot participate meaningfully in any conference with West Penn Power.

26. Complainant humbly requests the conference be postponed until West Penn Power has answered all of Complainant's Interrogatory Set I questions and Complainant's Interrogatory Set II 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 and Complainant's Interrogatory Set II questions.

As to this issue, stated in the Interrogatory Set I and Set II instructions:

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

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

Neither party was given the option to change or waive the objection due date.

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 28th; 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.

In particular, the following Interrogatory Set I questions were not answered or objected to by the objection due date, and now must be answered as this is the rule of law:

Interrogatory Set I – unanswered questions:

AVS Interrogatory Set I, No. 3

Have the smart meters installed on neighboring properties (all properties within 300 ft. of subject property), and likewise the smart meter proposed to be installed on Ann V.

Sheehan's home, been independently laboratory tested and certified and met safety standards for:

Voltage Variation, Frequency Variation, Harmonic Component, DC and Even Harmonics, Odd Harmonics in the AC Current Circuit, Sub-harmonics in the AC Current Circuit, Reversed Phase Sequence, Voltage Unbalance, Fast Transient Burst Test, Immunity to Electromagnetic RF Fields, AC Voltage Test, Surge Immunity Test, Impulse Voltage Test.

RESPONSE:

Please refer to West Penn's responses to AVS Interrogatories I-1 and I-2. In addition, Itron's metering products are American National Standards Institute ("ANSI") C12.1, ANSI C12.20 and Underwriters Laboratories ("UL") 2735 compliant devices.

COMPLAINT:

West Penn Power sent the UL Online Certification Directory and Itron 115 page technical report titled: Oconee ANSI Qualification Report for the Centron Open Way – August 2011

West Penn's response is vague and does not attempt to answer the specifics in the question – alludes to general standards and not specific testing. As per interrogatory instructions, "please furnish all information available to you, including any such information possessed by others that you can obtain, and not merely such information known of your own personal knowledge. If you cannot answer the Interrogatories and Requests in full after exercising due diligence to secure the information to do so, so state and answer to the extent possible." West Penn Power's response places an undue burden on the Complainant to disseminate technical information, as she is not a licensed engineer and is acting pro se.

AVS Interrogatory Set I, No. 4

If yes, please provide:

- a. Have they been tested in situ on an electromagnetically quiet home such as the subject home, or merely in the field?**
- b. the name of the independent laboratory providing the testing**
- c. the address of the independent laboratory providing the testing**
- d. the name of the professional in charge of the testing**
- e. all results of the independent testing**

RESPONSE:

- a. Please refer to West Penn's response to AVS Interrogatory I-3.
- b. Itron certified personnel perform the required ANSI tests on metering products commercialized by Itron, Inc. Itron certified personnel are involved early in the development phase of the project therefore acquiring design knowledge of the metering product. Having knowledge of the design, individuals are aware of product behavior and therefore able to detect product anomalies, if any, during all ANSI testing.

UL personnel performed the test to confirm compliance to UL 2735.
- c. See West Penn's response to AVS Interrogatory I-4, Attachments A and B.
- d. Itron, Inc. and Underwriters Laboratories.
- e. See West Penn's response to AVS Interrogatory I-4, Attachments A and B.

COMPLAINT:

#4a response does not attempt to answer question. "please furnish all information available to you, including any such information possessed by others that you can obtain, and not merely such information known of your own personal knowledge. If you cannot answer the Interrogatories and Requests in full after exercising due diligence to secure the information to do so, so state and answer to the extent possible."

#4c response refers to general collection of information and does not attempt to answer specific question. Forces complainant to search for information and is unduly burdensome for

information available to you, including any such information possessed by others that you can obtain, and not merely such information known of your own personal knowledge. If you cannot answer the Interrogatories and Requests in full after exercising due diligence to secure the information to do so, so state and answer to the extent possible.”

#4e response refers to general collection of information and does not attempt to answer specific question. Forces complainant to search for information and is unduly burdensome for complainant to find answer on her own, as she is not an engineer. “please furnish all information available to you, including any such information possessed by others that you can obtain, and not merely such information known of your own personal knowledge. If you cannot answer the Interrogatories and Requests in full after exercising due diligence to secure the information to do so, so state and answer to the extent possible.”

AVS Interrogatory Set I, No. 9

Is it the position of the company to provide safe service and any alternations or substitutions in or to such service as necessary or proper for the accommodation and safety of its patrons, pursuant to Section 1501 of the Pennsylvania Public Utility Code?

RESPONSE:

West Penn provides adequate, efficient, safe, and reasonable service within the meaning of the Public Utility Code, 66 Pa.C.S. § 1501. Act 129 of 2008 does not allow for an option to opt-out of a smart meter installation.

COMPLAINT:

#9 response does not answer question posed. “ please furnish all information available to you, including any such information possessed by others that you can obtain, and not merely such information known of your own personal knowledge. If you cannot answer the Interrogatories and Requests in full after exercising due diligence to secure the information to do so, so state and answer to the extent possible.”

AVS Interrogatory Set I, No. 11

When, according to your records, did Ann Sheehan first contact the company regarding a stray voltage and or magnetic power quality issue at her home?

a. What was and when was the company's response to her first request regarding the power quality issue?

RESPONSE:

West Penn objects to AVS Interrogatory I-11 on the grounds that it relates to issues outside the scope of this proceeding, and therefore is not relevant to the subject matter of this proceeding or reasonably calculated to lead to the discovery of admissible evidence.

COMPLAINT:

#11 West Penn Power may not object to answering this question after objection due date and therefore must answer question #11. Any objection not raised within the 10 day period provided for by Pa. Code 5.342© will be deemed waived and you will not be permitted to raise the objection at a later time.

AVS Interrogatory Set I, No. 12

How has First Energy responded in the past to customer complaints concerning stray voltage/magnetic radiation entering homes?

a. What mitigation methods in general does the company use to eliminate the power quality issues entering customer's homes?

RESPONSE:

West Penn objects to AVS Interrogatory I-12 on the grounds that it relates to issues outside the scope of this proceeding, and therefore is not relevant to the subject matter of this proceeding or reasonably calculated to lead to the discovery of admissible evidence.

COMPLAINT:

#12 West Penn Power may not object to answering this question after objection due date and therefore must answer question #12. Any objection not raised within the 10 day period provided for by Pa. Code 5.342© will be deemed waived and you will not be permitted to raise the objection at a later time.

AVS Interrogatory Set I, No. 13

Are most instances of stray voltage/magnetic radiation entering customers' homes due to induction or load current?

RESPONSE:

West Penn objects to AVS Interrogatory I-13 on the grounds that it relates to issues outside the scope of this proceeding, and therefore is not relevant to the subject matter of this proceeding or reasonably calculated to lead to the discovery of admissible evidence.

COMPLAINT:

#13 West Penn Power may not object to answering this question after objection due date and therefore must answer question #13. Any objection not raised within the 10 day period provided for by Pa. Code 5.342© will be deemed waived and you will not be permitted to raise the objection at a later time.

AVS Interrogatory Set I, No. 14

Concerning the elimination of the stray voltage problems at customer homes, including the Sheehan property:

- a. **Were surge arresters used?**
- b. **Were tap lines relocated away from transmission lines? How far?**
- c. **Were ground wells drilled?**
- d. **Was the tap converted to a three phase line to balance the load?**
- e. **Were isolation transformers installed on tap lines?**

RESPONSE:

West Penn objects to AVS Interrogatory I-14 on the grounds that it relates to issues outside the scope of this proceeding, and therefore is not relevant to the subject matter of this proceeding or reasonably calculated to lead to the discovery of admissible evidence.

COMPLAINT:

#14 West Penn Power may not object to answering this question after objection due date and therefore must answer question #14 a, b, c, d, and e. Any objection not raised within the 10 day period provided for by Pa. Code 5.342© will be deemed waived and you will not be permitted to raise the objection at a later time.

AVS Interrogatory Set I, No. 15

At what percentage (average) do transmission lines contribute to stray voltage?

RESPONSE:

West Penn objects to AVS Interrogatory I-15 on the grounds that it relates to issues outside the scope of this proceeding, and therefore is not relevant to the subject matter of this proceeding or reasonably calculated to lead to the discovery of admissible evidence.

COMPLAINT:

#15 West Penn Power may not object to answering this question after objection due date and therefore must answer question #15. Any objection not raised within the 10 day period provided for by Pa. Code 5.342© will be deemed waived and you will not be permitted to raise the objection at a late

AVS Interrogatory Set I, No. 16

At what percentage (average) does load current contribute to stray voltage?

RESPONSE:

West Penn objects to AVS Interrogatory I-16 on the grounds that it relates to issues outside the scope of this proceeding, and therefore is not relevant to the subject matter of this proceeding or reasonably calculated to lead to the discovery of admissible evidence.

COMPLAINT:

#16 West Penn Power may not object to answering this question after objection due date and therefore must answer question #16. Any objection not raised within the 10 day period provided for by Pa. Code 5.342© will be deemed waived and you will not be permitted to raise the objection at a later time.

AVS Interrogatory Set I, No. 19

If the customer's home is located 50 feet away from the company powerlines, does the company consider the customer is exposed to a safe level of magnetic radiation from those overhead powerlines?

- a. Has the company ever measured the electromagnetic exposure levels of customers whose properties are located near powerlines?**
- b. At what level of exposure to electromagnetic energy does the company believe is safe for growing fetuses and electromagnetically sensitive individuals?**
- c. Over what time period?**
- d. Does the company believe those exposure levels are safe over long periods of time such as a period of ten years?**
- e. Furnish all documents the company relies on for its opinion that such exposure is safe.**

RESPONSE:

West Penn objects to AVS Interrogatory I-19 on the grounds that it relates to issues outside the scope of this proceeding, and therefore is not relevant to the subject matter of this proceeding or reasonably calculated to lead to the discovery of admissible evidence.

COMPLAINT:

#19 West Penn Power may not object to answering this question after objection due date and therefore must answer question #19. Any objection not raised within the 10 day period provided for by Pa. Code 5.342© will be deemed waived and you will not be permitted to raise the objection at a later time.

AVS Interrogatory Set I, No. 20

If the company introduces RF or stray voltage/magnetic radiation to the property, including the residence and nearby properties of an electro-sensitive, causes physical illness to the customer and causes her a constructive eviction from the use of parts of her property, would the company acknowledge such cause and effect relationship and take responsibility to remedy the situation, if such remedy did not cause the company a great deal of money?

RESPONSE:

West Penn objects to AVS Interrogatory I-20 on the grounds that it relates to issues outside the scope of this proceeding, and therefore is not relevant to the subject matter of this proceeding or reasonably calculated to lead to the discovery of admissible evidence.

COMPLAINT:

#20 West Penn Power may not object to answering this question after objection due date and therefore must answer question #20. Any objection not raised within the 10 day period provided for by Pa. Code 5.342© will be deemed waived and you will not be permitted to raise the objection at a later time.

AVS Interrogatory Set I, No. 21

Are wired smart meters in use in Maryland by First Energy? If yes, under what circumstances? List the manufacturers of wired smart meters, the makes and models of them and all technical information regarding them, that are in use by First Energy for its residential customers.

RESPONSE:

West Penn objects to AVS Interrogatory I-21 on the grounds that it relates to issues outside the scope of this proceeding, and therefore is not relevant to the subject matter of this proceeding or reasonably calculated to lead to the discovery of admissible evidence.

COMPLAINT:

#21 West Penn Power may not object to answering this question after objection due date and therefore must answer question #21. Any objection not raised within the 10 day period provided for by Pa. Code 5.342© will be deemed waived and you will not be permitted to raise the objection at a later time.

AVS RPD Set I, No. 3

Please provide all medical documentation, with all identifiable health information deidentified, from other utility customers who have claimed to have been harmed by RF and harmonics which are produced by smart meters.

RESPONSE:

West Penn objects to AVS RPD I-3 on the grounds that it is unduly burdensome, relates to issues outside the scope of this proceeding, and is not relevant to the subject matter of this proceeding or reasonably calculated to lead to the discovery of admissible evidence. West Penn further objects to AVS RPD I-3 to the extent that it requests confidential information that cannot be disclosed by West Penn under the provisions of 52 Pa. Code § 54.3.

COMPLAINT:

AVS RPD Set 1 - #3 West Penn Power may not object to answering this question after objection due date and therefore must answer question #AVD RPD #3. Any objection not raised within the 10 day period provided for by Pa. Code 5.342© will be deemed waived and you will not be permitted to raise the objection at a later time.

AVS RPD Set I, No. 4

Please provide all peer reviewed medical literature from those scientists who are not funded by or otherwise connected with the wireless industry, regarding the safety of West Penn Power smart meters for those who have electro-hypersensitivity.

RESPONSE:

West Penn objects to AVS RPD I-4 on the grounds that it is vague, ambiguous, overly broad, irrelevant, outside the scope of this proceeding, and not reasonably calculated to lead to the discovery of admissible evidence. Please refer to West Penn's response to AVS RPD I-2 for the specific literature relied on by West Penn in this proceeding.

COMPLAINT:

AVS RPD Set I - #4 West Penn Power may not object to answering this question after objection due date and therefore must answer question #AVD RPD #4. Any objection not raised within the 10 day period provided for by Pa. Code 5.342© will be deemed waived and you will not be permitted to raise the objection at a later time.

AVS RPD Set I, No. 5

Please provide all medical documentation from "independent of the wireless industry" peer reviewed literature as to what level of RF and what level of stray voltage is safe for humans who suffer from electro-hypersensitivity, and for what duration of time.

RESPONSE:

West Penn objects to AVS RPD I-5 on the grounds that it is vague, ambiguous, overly broad, irrelevant, outside the scope of this proceeding, and not reasonably calculated to lead to the discovery of admissible evidence. Please refer to West Penn's response to AVS RPD Set I-2 for the specific documentation relied on by West Penn in this proceeding.

COMPLAINT:

AVS RPD Set I - #5 WPP may not object to answering this question after objection due date and therefore must answer question #AVD RPD #5. Any objection not raised within the 10 day period provided for by Pa. Code 5.342© will be deemed waived and you will not be permitted to raise the objection at a later time.

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.

In particular, the following Interrogatory Set II questions were not answered or objected to within PUC regulated timely fashion, and now must be answered as this is the rule of law:

Interrogatory Set II – unanswered questions:

AVS Interrogatory Set II, No. 9

What standard does West Penn Power follow concerning levels of voltage distortion at the point of common coupling? At what percentage of THD (Total Harmonic Distortion)?

RESPONSE:

West Penn objects to this Discovery Request on the grounds that the question is vague, irrelevant, outside the scope of this proceeding, and not reasonable likely to lead to the discovery of admissible evidence. Specifically, the question raises issues wholly outside the scope of the Formal Complaint that began this proceeding. In addition, the question references undefined terms and does not explain whether West Penn should consider these terms in the context of smart meter implementation or otherwise. Notwithstanding the foregoing objection, West Penn provides the following response:

Please refer to West Penn's response to AVS Interrogatory I-26.

COMPLAINT:

#9 Answer did not apply to the question. "please furnish all information available to you, including any such information possessed by others that you can obtain, and not merely such information known of your own personal knowledge. If you cannot answer the Interrogatories

and Requests in full after exercising due diligence to secure the information to do so, so state and answer to the extent possible.”

Complainant humbly requests the Telephonic Hearing scheduled for September 19, 2018 at 10am be postponed until West Penn Power has answered all of the above 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.

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 above questions posed in Complainant's Interrogatory Set I and Interrogatory Set II within ten days of this Order, and the telephone conference originally scheduled for September 19, 2018, is hereby continued until mutually rescheduled by the parties.

Respectfully submitted this 20th day of August, 2018



Ann V. Sheehan
4986 Carmack Court
Mercersburg, PA 17236
annsheelan@md.net

CERTIFICATE OF SERVICE

Ann V. Sheehan v. West Penn Power/First Energy Company

Docket No. C-2017-2630406

I hereby certify that I have this day served a true copy of the Amended Motion to Compel and Extension of Time of Ann V. Sheehan to West Penn Power/First Energy upon the individuals listed below, in accordance with the requirements of 52 Pa. Code 1.54 (relating to service by a participant).

Service by email, as follows:

First Energy Service Company (original filing to Lepkoski and Giesler)
Lauren M. Lepkoski, Esquire
Tori Giesler, Esquire
Teresa Herrold, Esquire
2800 Pottsville Pike
P.O. Box 16001
Reading, PA 19612-6001
llepkoski@firstenergycorp.com
tgiesler@firstenergycorp.com
therrold@firstenergycorp.com

Via email to those listed above

Dated this 20th day of August, 2018


_____ Ann V. Sheehan

Verification

For

Amended Motion to Compel and for Extension of Time

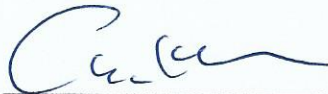
In the matter of

Ann V. Sheehan v. West Penn Power/First Energy

Docket No. C-2017-2630406

I, Ann V. Sheehan, hereby state that the facts above set forth are true and correct to the best of my knowledge, information and belief and that I expect to be able to prove the same at a hearing held in this matter.

I understand that the statements herein are made subject to the penalties of 18 Pa. C.S. 4904 (relating to unsworn falsification to authorities).



Ann V. Sheehan – Complainant

8-20-18

date