

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Alan V. Schmukler, :

:

Complainant, :

:

v. Docket No. C-2017-2621285

:

PPL Electric Utilities Corporation, :

:

Respondent :

**Exceptions Of Complainant Alan V. Schmukler to
the Initial Decision of Administrative Law Judge
Elizabeth H. Barnes Issued August 16, 2018**

Dated Aug 26, 2018

Explanation of citations :

Exhibit = Complainant's original paper exhibits (loose leaf binder)

Brief = Complainant's Brief

Reply Brief = Complainant's Reply Brief

Response to Motion to Strike = Complainant's Motion to Strike

Transcript = Transcript of Complainant's Hearing

**Numbers in parentheses without any designation (eg. 34) = the ALJ's Initial
Decision (that this document is taking exception to.)**

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Introduction

Complainant Alan V. Schmukler hereby submits these Exceptions to the Initial Decision of Administrative Law Judge Elizabeth H. Barnes issued on August 16, 2018. The Complainant filed a complaint against the Respondent when they placed an AMI electric meter on the adjoining wall of his neighbor's house and demanded to place an AMI meter on his residence as well. The Complainant has suffered from electromagnetic

sensitivity (EHS) for over 30 years and his usual insomnia was massively exacerbated when the AMI meter was placed inches from his residence on a party wall. He also suffered difficulty concentrating. He has asked the Respondent to cease from placing an AMI meter on his residence and to replace the one next door with an analog meter such as served well for years.

Exception 1 (p.26)

The ALJ Barnes errs in concluding that “*EHS is not a medical diagnosis that is widely accepted among medical practitioners given the credible testimony of Dr. Israel... and “I am not convinced EHS has a scientific basis”*”

The ALJ states (P.26, 27) *I am persuaded by the credible testimony of Dr. Israel,* *who testified he would not rely upon either the Bio Initiative Report or World Health Organization press release entitled, “IARC Classifies Radiofrequency Electromagnetic Fields as Possibly Carcinogenic to Humans” dated May 31, 2011 as reliable scientific studies.*

While the Bioinitiative Report and IARC classification of RF fields as carcinogenic are totally credible, there is nothing credible about Dr. Israel as regards EHS. **Mark Israel has no qualifications to give expert testimony on electro magnetic hypersensitivity (EHS).** Israel acknowledged in sworn testimony that he has never treated or even talked with someone suffering from electromagnetic sensitivity (EHS), that he has no credentials in this specialized field, that he's never read any books on electromagnetic fields, or attended any national conferences on the subject, nor done any independent research on it. (Reply Brief p. 21-23). Complainant presented 149 pages of studies, articles and other evidence that contradict Mark Israel's testimony that EHS is not a real or recognized medical condition and that non-ionizing radiation is harmless. (Brief 71-220) . The ALJ chose to ignore those 149 pages that validated EHS.

Exception 2 (p.9)

The ALJ Barnes erred in her finding of fact :

The levels of RF fields from the Landis + Gyr Focus AXR-SD AMI meters are 98,000 times lower than the RF exposure safety limits established by the FCC.

PPL Electric Statement No. 1 at 9, 14, PPL Electric Exhibit CD2.

The limits established by the FCC are outdated (from 1966) and based on thermal effect. In my Brief I quoted a letter from the EPA stating: ***“FCC does not claim that their exposure guidelines provide protection for exposures that are chronic/prolonged and non-thermal.”*** (Brief p. 68-69) Ie., the FCC guidelines were not meant to cover the 24/7 RF radiation emitted by PPL’s AMI meter.

Furthermore, Harvard University ethicists described FCC as a “captured agency dominated by the industries it presumably regulates.” (Brief P. 65)

Exception 3 (p.9)

The ALJ Barnes erred in her finding of fact : *RF signals from the AMI meter are of very short duration and will occur for only a total of 84 seconds over a 24-hour period. PPL Electric Statement No. 1 at 7.*

This is an error of omission. The ALJ neglected to mention that Complainant’s expert witness William Bathgate testified that, using a spectrum analyzer, he found that this model smart meter transmits every 4 to 10 seconds around the clock (Transcript p.97, 11-17) and (Transcript p.49-54.) Bathgate , testified that the AMI meter could emit microwave bursts up to thousands of times a day in its attempt to communicate with other meters as part of its “mesh network” of message management.

Complainant also testified that he measured emissions from his neighbor's meter every 7-12 seconds. The 84 seconds are broken up into many thousands of milliseconds, so that the Complainant is exposed to radiation day and night, 24 / 7. PPL's witness Christopher Davis was willing to concede that the AMI meter gave 1,720 transmissions per day, which is once every 1.2 minutes. (Transcript: p. 262 11,12).

Exception 4 (p.9-10)

The ALJ Barnes erred in her finding of fact: *Based on the locations of each tower and their RF power outputs, the constant background level of RF fields at Complainant's residence are 16.7 times higher than the 10 RF signals from the AMI meter. PPL Electric Statement No. 1 at 13, Tr. 260-61, PPL Electric Exhibit CD-5.*

That statement was made by PPL's Christopher Davis, who subsequently acknowledged that he never made any actual measurements of RF radiation at Complainant's residence, but just surmised it from calculations. (Transcript p.272 (12)).

Exception 5 (p. 10)

The ALJ Barnes erred in her finding of fact : *The RF exposure from a cell phone used at a person's head is 260,000 times higher than the average RF levels 1 meter away from the Company's new smart meter. C Introduction at 2, PPL Electric Statement No. 1 at 11, PPL Electric Exhibit CD-4.*

That statement was made by PPL's Christopher Davis and is without basis in fact. (Would anyone would ever use a cell phone if it were so?) In fact, radiation expert Daniel Hirsch found that smart meters expose people to between 50 – 160 times the radiation of a cell phone. (Brief p.205-216). Both the AMI meter and most cell phones operate with the same kind of RF radiation and at approximately 900 MHz. The AMI emits radiation day and night, 24/7, unlike a cell phone which emits only when it is in use. The user can shut off the cell phone, but the AMI cannot be shut off. The Cell phone exposes the user primarily at the head, while the AMI involves whole body radiation.

Exception 6 (p.10)

The ALJ Barnes erred in her finding of fact : *The new smart meter does not generate electrical power, does not produce additional harmonics over and above what is already coming into the meter, and does not interfere with the operation of*

house wiring. C Exhibit 26, Tr. 41-42, 55-74, 102, PPL Electric Statement No. 1 at 11

Complainant's witness William Bathgate testified that the switch mode power supply in the AMI meter creates transients on the house wiring that extend into the rooms of a house.) (Transcript p. 52-60) He presented oscilloscope pictures showing the transients on the line. (Brief 224-225)

Exception 7 (p.12)

The ALJ Barnes erred in her finding of fact : *None of Complainant's exhibits are actual scientific studies and most appear to be taken from activist websites. PPL Electric Statement No. 2 at 17-20.*

Complainant referenced and also submitted relevant portions of many studies, along with internet links to the complete studies, which could be read at the click of a mouse. Complainant did this because hundreds of studies were referenced, and printing them all out in full would have required many thousands of pages. This would have been both physically taxing and expensive for the complainant. When Respondent states there were no "actual" studies, that is what they meant. In fact, Complainant referenced hundreds of studies all of which were available in full at the internet links he provided.

The ALJ chose to exclude all the Complainant's most important studies from evidence. **The 10 year, \$25 million NTP study**, the results of which were confirmed by an independent committee, and the huge **Ramazzini Institute study**, both of which found that cell phone radiation, which is of the same type emitted by the AMI meter, caused Glioblastomas (brain tumors) and Schwannomas (tumors of the heart). (Brief p217-218)

Obviously, since this radiation can cause cancer, it can also affect someone who is hypersensitive to electromagnetic radiation, as is the complainant. The ALJ also chose to ignore the **Biointiative 2012 report** , which presented 1800 studies showing physiological effects from non-ionizing radiation. (Brief p. 133)

The ALJ also excluded a study which showed that **insomnia was the most often reported complaint in people exposed to electromagnetic radiation. (Brief 180-181)**. This scientific study was available under creative commons on the internet and available to anyone for free. **The ALJ also excluded studies showing that sleep and/or melatonin levels were adversely affected by electromagnetic fields. (Brief p. 183-197)**

Exception 8 (p. 12)**The ALJ Barnes erred in her finding of fact :**

There is no reliable medical basis to conclude that RF fields from the AMI meters being used by PPL will cause or contribute to the development of illness or disease. PPL Electric Statement No. 2 at 21.

See my Exception 7 above. I provided the most up to date research to show that RF fields such as emitted by AMI meters can cause or contribute to illness.

Exception 9 (p.18 & 46)**The ALJ erred in striking evidence and declaring:**

..the Motion of PPL Electric Utilities Corporation to Strike Certain Portions of the Complainant's Reply Brief filed on June 6, 2018 is granted. ... the extra-record evidence in Complainant's Reply Brief is hereby stricken.

The ALJ allowed some of the Complainant's evidence in his initial exhibits to be stricken as hearsay or as being incomplete. She did this despite Complainant's subsequent argument that most of the "hearsay" evidence fell under one or another exception to the hearsay rule, or that it was no incomplete. (Reply Brief 26-38)

The ALJ also granted PPL's motion to exclude important evidence in Complainant's Main Brief and all evidence in his Reply Brief. She found that the evidence in the Brief Main and Reply Briefs was "new" evidence.

Complainant contended that this was not "new" evidence but slight modifications of his original evidence. Examples included: more easily clickable internet links to studies, full studies where relevant portions had been offered originally, substantiation of previous evidence, using citations from sworn testimony in other hearings. Also two important studies (NTP and Ramazzini Institute) came to completion after the hearing. Complainant, operating pro se, didn't know that he could ask the court to open the record for new evidence. He reported on the NTP study in his Exhibit 11, but the final results arrived after the hearing. The NTP and Ramazzini Institute studies are now considered landmark studies. Both studies are critical to the issues at dispute in this case. Complainant's Exhibit 9 was a study which found that insomnia was the most often reported symptom after exposure to electromagnetic fields. That's critical evidence in this case. Complainant presented the relevant portions of the study along with a link to the entire study, so Respondent could access it with the click of a mouse. The ALJ Barnes excluded that evidence from Exhibit 9 at the hearing as being incomplete (Hearing Transcript p.151- 23-25, p. 152 – 1-25 + 19-20) and again from the Brief (Brief – 180 -181) and the Reply Brief as well (Reply Brief.30,31). This study was

published under a Creative Commons license, meaning it was available for anyone to read without charge. The Respondent had access to the entire study at all times. (Complainant's Response to Motion to Strike pp. 2-6).

Complainant, operating pro se, also learned after the hearing, that he could authenticate some of his previous exhibits with testimony of expert witnesses from other hearings. In his Brief and Reply Brief he included citations from those expert testimonies, to authenticate evidence he had already presented. This was authentication of originally presented evidence, not new evidence. As the Complainant could not afford to pay witnesses, it was one of his only means of authenticating his evidence. The ALJ excluded and allowed to be struck, all of that also. (Complainant's Response to Motion to Strike pp. 2-6)

The ALJ also struck from evidence the impeccably researched **Nation Magazine** article which was published after the Hearing. It detailed how the wireless industry had hidden the danger of cell phone radiation (which is identical to smart meter radiation) by doing phony studies, corrupting regulatory agencies, disparaging scientists who found harm from cell phone radiation and other deceptive measures. (Brief P.198-205)

Exception 10 (p.44)

The ALJ erred when she stated that “*Nothing in Act 129 permits a customer to “opt-out” of a smart meter installation.*”

Act 129 was written and intended as an Opt-In program, so there would have been no point to adding an Opt out clause. In Complainant’s Brief he demonstrates that Act 129 was intended as a voluntary program for the consumer. The wording of the Act and even the PUC’s website reveal that it was meant to be voluntary (opt-in) for residents. (Brief p. 228-236) (Reply Brief p. 16-18). The only mandate was for the utilities, not the residents. Also, Act 129 never specified that utilities had to accomplish their goal by using a switch mode power supply or a meter that emitted dangerous levels of RF radiation, or radiation that some customers would be dangerously sensitive to.

Furthermore, at the time that Act 129 was initiated, **the NTP and Ramazzini Institute studies showing a direct link between non-ionizing radiation and cancers of the brain and heart, were not available.** If that information had been factored into the discussion, the rules for implementing Act 129 would have excluded the AMI meter as currently designed. It goes without saying that a law compelling an action that may kill innocent people cannot be just or legal. (Brief p.9).

Exception 11 (p.40)

The ALJ Barnes erred when she stated that PPL has the legal right to terminate Complainant's electric service if it is denied access to the meter.

The Complainant never denied PPL access to his meter. He just refuses to permit an AMI meter that would cause him bodily harm. The intent of Act 129 was, at some level, intended to benefit the consumer. Shutting off electric service for a 74 year old man at a residence where electric bills have always been paid, because he cannot tolerate a particular model of meter, (medical necessity), would violate the intent of Act 129. How does it benefit the consumer to have no electricity?

In Complainant's Brief he demonstrates that Act 129 was intended as a voluntary program for the resident. The wording of the Act and even the PUC's website reveal that it was meant to be voluntary (opt-in) for residents. (Brief p. 228-236)

The only mandate was for the utilities, not the residents. Also, the Act never specified that utilities had to accomplish their goal using a switch mode power supply or a meter that emitted dangerous levels of RF radiation, or radiation that some customers would be dangerously sensitive to.

Shutting off electric service because a citizen can't tolerate a particular model of electric meter, is absurd on its face. Cutting off electricity creates a total disruption

of one's life. No refrigeration of food, no air conditioning in the summer, no heat in the winter, no hot water, no light, no access to media etc. It's a serious matter and can be life threatening.

If the court sanctions the shutting of electric service because a citizen won't purchase a particular model of electric meter, it would be a violation of the spirit of the Eighth Amendment's prohibition against "cruel and unusual punishment.

Exception 12 (p.39)

The ALJ erred when she stated: *To the extent that Mr. Schmukler desires the ability to opt out of the smart meter installation, he could advocate for such ability before the General Assembly.*

The Complainant has asserted and provided evidence, that he has a sleep disorder which has been severely exacerbated, producing a brutal insomnia, since the AMI meter was installed on his neighbor's adjoining wall. Because of his EHS he has studiously avoided proximity to EM fields at work and at home for over 30 years. The two symptoms he gets are worsening insomnia and mental foginess. Now he has constant exposure to the EM fields from the AMI meter. He is struggling every day to compensate for this. (Complainant original Exhibits 1, 1B, 2, 2B, 3,) (p. 5-6 ALJ initial decision)

This is not a situation that can wait for the General Assembly to act. Furthermore, opt out bills have been thwarted for the last six years by Consumer Affairs Committee chairman Robert Godshall, who kept them from being voted on. Thus, the citizens opportunity to vote on an opt- out bill was and is being denied and doesn't exist for all practical purposes. (Brief p. 238-239).

Exception 13 (p.28-29)

The ALJ erred in reasoning when she stated: *Given Mr. Bathgate's lack of knowledge about the science of RF fields, I find his testimony about RF fields from the AMI meters to be unpersuasive.)*

The discussion about ionizing and non- ionizing fields involved semantic differences that were misunderstood. Regardless of how one views it, that mini conversation does not negate Mr. Bathgate's 40 years of experience at the highest levels of his field. His comment was used by the Respondent to try and undermine his entire testimony.

Below I present his qualifications as he stated them under oath in: McKnight v

PECO, C-2017-2621057

William Bathgate - Qualifications

William S. Bathgate: I am employed by TATA Consulting Services (TCS) as an assigned Program Manager for the FCA Automotive Group (Chrysler). My current assignment is for design of autonomous vehicles and the “Connected Vehicle” programs. This requires in-depth knowledge and experience in Radio Communication for WIFI, Cellular and electronic sensing systems for vehicle positioning accuracy. Prior to TATA I worked for Emerson Electric in high voltage / High Current power distribution system. **I hold a Top Secret DoD Security Clearance and have been the lead on the design and manufacturing of the power and control systems for the THAD missile defense systems**, seconded to Raytheon Corporation thru Emerson Electric. **I have a degree in electrical engineering, with over 40 years of practical experience in commercial design and manufacturing of electrical power and computing systems** such as the original IBM PC, S/370 Mainframe systems and intermediate platforms such as the AS/400, Unix and Linux systems. I may not have a PhD in electrical engineering, but no academic person has 40 years of practical experience in commercial endeavors in electrical and electronic systems. In addition I have practical experience in High Voltage 115 KV to 138KV to Low Voltage <1000 Volts power conversion to enable power

distribution in large industrial buildings such as the Sears Tower in Chicago, for example. **I have been a leader of several design and manufacturing projects that use the same components as used in the AMI meters from several manufactures such as GE, ITRON, SENSUS, ACLARA and Landis+Gyr. I have disassembled each of these meters to understand the technology applied.** My observations are that while there are differences in some of the circuit components and the board layouts are different as used by different manufacturers the basic block diagram of all the meters are very close to one another.

Exception 14 (P.29)

The ALJ erred in her conclusion: “ ... *Mr. Bathgate’s opinions were based on some incorrect assumptions, and his testimony is unreliable to prove Complainant’s claim that voltage transients are produced by the Landis + Gyr meter when all appliances are shut off because of insufficient filters. I find in favor of Respondent on the issue of health and safety concerns.*

Mr. Bathgate was cross examined about transients and there was some confusion about whether his measurements occurred with or without appliances on. However the conversation concluded with Bathgate declaring that made measurements both

with and without appliances on, and he still found the transients. (Transcripts p.85 ,1-9). He testified that in addition to the microwave radiation emitted by Defendant's AMI meter, the meter also created high frequency voltage transients due to its "switched mode power supply" (SMPS) and that these voltage transients were superimposed on the house wiring, creating electromagnetic fields that extended into the rooms of any home with an AMI meter.). (Hearing Transcript p.56 1-5, p.59, p.62, 22-25, p.65,66 -20-24 and Complainant Exhibit 26).

Exception 15 (P.34)

The ALJ declared that she was persuaded by the "credible testimony" of Christopher Davis that the AMI meter was not a fire risk.

Davis's testimony was in direct contradiction to testimony of expert witness William Bathgate, who declared that the AMI meter could burst into flame from a power surge. (Transcript: p. 76-11-25, p. 77- 1-15, p. 78- 7-17, p 79, 5-9, p.78, 7-17) . Even PPL witness Scott Larsen acknowledged safety design deficits in their AMI meter and poor response time to meter emergencies. (Brief p. 60) (Transcript - p.244, 3-19). In spite of that, and the fact that Mr. Bathgate had far more experience in the mechanics of smart meters than Davis, the ALJ chose to accept the testimony of PPL's Davis.

During the Hearing, Davis, was asked “Would you permit a five-year-old child to sleep with a cell phone in transmit mode next to its head?” He replied, “I would.” (Transcript p. 280, 17-21) . He also acknowledged dismissing all the scientists who found harm from non-ionizing radiation, by stating that they were “just trying to get more money for research.” When asked on a video why people get brain tumors on the same side where their cell phone was used, he declared, “They don't often remember which side of the head they've used their phone on.” (Reply Brief p.40-41) (Transcript – P.274, 23-25). This is the man who the ALJ found most credible.

Exception 16 (p.36)

The ALJ Barnes erred in declaring that Complainant cannot contest the installation of the AMI meter on his neighbor’s property because it would violate the neighbor’s due process rights

The neighbor’s meter is inches from Complainant’s residence and the range of its RF radiation easily encompasses his entire residence. (Transcript p.54 & 55).

PPL claims that it would violate the neighbor’s due process rights to remove it.

However PPL did not offer the neighbor a choice about the meter when they installed it. PPL sent out a flyer stating that the meter would be installed. The flyer

did not ask her permission, or inform her that she could refuse it. Nor did the flyer inform her that many scientists considered the radiation emitted by the AMI meter to be carcinogenic. It was PPL that violated her due process by not getting her “informed” consent.

If a device on an adjoining property threatens the health or life of a neighbor, a court may rule that it be replaced with a safer device, as in this case, the AMI meter being replaced with an analog meter.

Exception 17 (p.25)

**The ALJ erred when she disregarded the Complainant’s doctor’s letters
She also erred in striking the biographies of the doctors (p.18).**

The ALJ stated: *I am giving little or no weight to the letters in Complainant’s Exhibit 1 because the doctors were not present to be cross-examined... Dr. McGee appears to be a medical physician. The other three letters appear to have been written by doctors with homeopathic education.*

Since there is a hint of disparagement of the homeopathy doctors I offer this:

In India, doctors with homeopathic medical education receive the same medical training as conventional doctors, with the exception that they don’t treat with

conventional drugs. They can be BHMS, MD etc. and are medically qualified to diagnose and treat any disease, acute, chronic or epidemic.

The Complainant presented three letters from medical doctors and one from a naturopathic doctor. Since their veracity and integrity was challenged by PPL's counsel, the bios of the doctors became imperative. Dr. Michael McGee MD has been in practice for over 20 years. He is affiliated with multiple hospitals and is a respected member of the community. Dr. Manish Bhatia was conferred with India's highest honor for a physician. He is also a medical college Professor and author of Lectures on Organon of Medicine. Dr. D'Souza is a board certified MD in cardiology and general medicine. Dr. Manfred Mueller is a Naturopath who has been an integrative medicine consultant for the University of North Carolina School of Medicine and taught courses there.

The ALJ Barnes dismissed their professional opinions, even though they have treated the Complainant for a number of years. (Reply Brief for full biographies – p. 24-27).

Exception 18 (p.25)

The ALJ erred when she stated *“There is insufficient evidence to prove the installation of the AMI meter caused the worsening of Complainant’s symptoms as they are subjective by Complainant’s own admissions.”*

Since there are no practical tests for EHS the diagnosis is arrived at by patient report. Patients report the symptoms occurring when they are exposed to EM fields. If you deprive people the validity of their subjective experience, medicine would be back in the dark ages. It wasn’t long ago that women complaining of unusual symptoms were all given the diagnosis of hysteria. Four doctors asserted that the Complainant is made worse by exposure to EM Fields such as those emitted by the AMI meter. (Complainant’s original Exhibit #1). The Complainant has a long history (30 years or more) of EHS and the necessity to avoid proximity to electromagnetic fields. (Complainant’s original Exhibits # 2, 2B, 3) and (Complainant’s original Exhibit p121-128 .)

Exception 19 (p.42-43)**The ALJ drew the wrong conclusion when she stated:**

A person does not sustain his or her burden of proof in an electric and magnetic field exposure case when the record evidence, “taken as a whole, leads to the ultimate finding and conclusion that the scientific studies at present are inconclusive” ... ” rather, the person must demonstrate by a preponderance of the evidence that such exposure actually causes adverse health effects.

The Complainant did meet the burden of proof. If the Complainant relied solely on the conclusions of the 10 year, \$25 million NTP study (confirmed by independent committee) and the equally large Ramazzini Institute study, he would have met the criteria for proving adverse health effects from EM field exposure. In addition he presented the Bioinitiative 2012 report with 1800 studies many of which were also confirmatory. (Reply Brief p 33-34 and p. 36-37) (Exhibit 16)

CONCLUSION

I, the Complainant, have been operating pro se throughout this legal battle. At every turn the Respondent has chosen to strike my evidence, rather than to argue it. That has been the theme of this case, with the ALJ ultimately siding with the

Respondent in every important matter. The ALJ disregarded my only expert witness in favor of two Respondent witnesses who I have tried to show were either unqualified or unreliable. How could I ever prevail if the court excludes or disregards my most crucial exhibits, studies, articles, the substantiation of my documents from experts in other hearings, all of my doctor's opinions and all my testimony?

What is at stake for the Respondent is whether they will calculate my electric usage with an AMI meter or an analog one (as they did for years). What is at stake for me, is the quality of my life, which will continue to suffer as my insomnia worsens from yet a second meter on the wall of my house. My health will decline as I struggle to compensate against the AMI meter's RF field to which I am unnaturally sensitive.

The Respondent, PPL Electric Utilities Corporation and the ALJ are claiming the Respondent would be disadvantaged if the information in my Exhibits, Brief and Reply Brief were admitted into evidence. The Respondent is a multinational corporation with vast resources. The Complainant is a man of 74 years, operating pro se and living on social security. He suffers constant stress from the AMI meter and the endless chore of this legal challenge. So, how can the Respondent, PPL Electric Utilities Corporation, ever be considered the disadvantaged party?

Does all of this need to go on, just because of a particular model of electric meter? Utilities in 10 other states have Opt- out provisions, and they suffer no harm from this. Pennsylvanians have been denied that alternative. If the Commission rules in my favor, it will be of little consequence to the Respondent but of great consequence to me.

For the reasons set forth above, Complainant Alan V. Schmukler respectfully requests that the Commission grant these Exceptions and issue a Final Order that rejects the ALJ's Initial Decision of Aug 16, 2018, and orders PPL to replace the electric meter at 197 Strawberry St. in Leola, PA with an analog meter, and allows the current non-AMI meter on Complainant's residence to remain in place indefinitely.

Respectfully submitted,

Alan V. Schmukler

Certificate of Service

I hereby certify that I have this day served a true copy of the foregoing document upon the parties, listed below, in accordance with the requirements of §1.54 (relating to service by a party). All parties were served by email and told it was also filed with the Commission's electronic filing system.

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Dated this day of August 27, 2018

Alan V. Schmukler

