

Motion to compel responses to Interrogatories and Requests for production of documents.  
Docket # C-2018-3000257. Kim Betchy v. WPPC.

Lauren Lepkoski; First Energy, WPPC, 2800 Pottsville Pike, PO Box 16001, Reading Pa. 19612.

2-F, Answer No.

2-B, Answer 56, age was listed on medical evidence that was provided to your office.

4-D, I never made a claim that I am an expert on anything. I do believe of all the expert professional research/ studies, reports, investigations, M.D. reports to be of truth, on the findings of all smart meters to be unsafe.

5. No.

8-D, No.

11-D, No.

18-D, No.

19-B, Customers must give their consent, refer to PUBLIC UTILITY CODE ( 66 PA.C.S.)- OMNIBUS AMENDMENTS Act of Oct. 15,2008, P.L. 1592, No. 129.

19-C, Smart meters can be installed if customer request it and that they agree to pay for the expense, also customer must give their consent for the recordings, DATA from the smart meter to be released to third parties, in which you do not have. It is illegal to spy, surveille, record, release our personal DATA to another party with-out our consent.

26-D, No.

29-D, No.

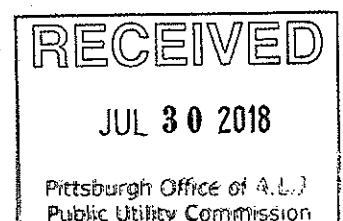
30-D, No.

37. There is no claim that I am an expert on anything. I have no degree in design of tecnology for smart meters. I am relying on the thousands of research studies on smart meters.

38. Survey/Engineering.

22. I did not design the smart meter, therefore I cannot answer that, but, PECO could answer that.


25. Refer to Exhibit E, Thousands of RESEARCH STUDIES, on the dangers of exposing harmful RADIATION from these smart meters to humans and to animals. The workers do not wear any protective gear, from what I have seen.



27. I previously answered that question, refer to Exhibit D, P. 2.

35. Don't need any, the LAW is the LAW! Meters were never mandated, refer to passed Bills in the SENATE.

52. I previously answered that question. There has been no court action taken at this time, this is not about the workers, it's about my safety, my health concerns of this dangerous smart meter. Refer to Exhibit J, page 1 of 2, SMART METER FIRES.

Kim Betchy  Date; 7-27-18