

August 20, 2018

VIA EMAIL

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

RE: Ann V. Sheehan v. West Penn Power/First Energy Company Docket No. C-2017-2630406

Dear Ms. Chiavetta,

Attached, please find the Motion for In-Person Hearing and for Extension of Time (refiled) 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  
Lauren M. Lepkoski, Esquire  
Tori Giesler, Esquire  
Teresa Herrold  
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

MOTION FOR IN-PERSON HEARING AND EXTENTION OF TIME (RE-  
FILED)

NOTICE TO PLEAD

Pursuant to 52 Pa. Code 5.61, you are hereby notified that, within 20 days, you must answer the enclosed Motion for In-Person Hearing and Extension of Time. 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 :**

**Original document submitted to PUC on May 2, 2018**

**Re-submitted to the PUC on August 20, 2018**

**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

February 2, 2018, with objections due on February 12<sup>th</sup> and answers due on February 22<sup>nd</sup>.

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

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<sup>th</sup>; 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 28<sup>th</sup>, 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 15<sup>th</sup> and objections due by March 5<sup>th</sup>. Once again, West Penn Power sent their answers on March 19<sup>th</sup>, four days past due, with objections in the body of the document. No objections were filed by the due date of March 5<sup>th</sup>.

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 this 20<sup>th</sup> day of August, 2018

A handwritten signature in blue ink, appearing to read 'Ann V. Sheehan', with a long horizontal flourish extending to the right.

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

Verification

For

MOTION FOR IN-PERSON HEARING AND FOR EXTENSION OF TIME (refiled 8-20-18)

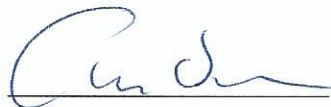
In the matter of

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

# 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 Motion for In-Person Hearing and for Extension of Time (refiled) 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  
Lauren M. Lepkoski, Esquire  
Tori Giesler, Esquire  
Teresa Herrold  
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 20<sup>th</sup> day of August, 2018



Ann V. Sheehan