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PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

Lynn Force

1387 University Drive  
State College, PA 16801

September 13, 2018

Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
P.O. Box 3265  
Harrisburg, PA 17105-3265

Re: Lynn Force v. West Penn Power Company  
Docket No. C-2017-2634987

Dear Secretary Chiavetta:

Enclosed please find my Reply to Motion of West Penn Power Company to Compel Responses to Interrogatories and Document Requests. A copy has also been served upon counsel for West Penn Power Company, and Administrative Law Judge Jeffrey A. Watson. Additionally the answers are being sent with a copy of this Reply to Ms. Lepkoski.

If you have any questions, you can call me at 814-237-0578.

Very truly yours,

Lynn Force

Lynn Force

Enclosures

cc: As Per Certificate of Service

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Before the  
Pennsylvania Public Utility Commission

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SECRETARY'S BUREAU

Lynn Force

v.

West Penn Power Company

Docket No. C-2017-2634987

Reply to Motion of West Penn Power Company to Compel  
Responses to Interrogatories and Document Requests

1. I am going to answer the objected to Interrogatories  
2.c. - h and 3. to the best of my ability for the  
following reasons:

The Motion to Compel was filed on 9/6/18, but it  
arrived in the mail on the afternoon of Wednesday,  
9/12/18. It was postmarked September 7, 2018  
US Postage, Pitney Bowes. It took 6 days to  
get to me in the mail. I received this Motion  
to Compel one day beyond the time I had to file  
a response. So this motion might be granted  
before you even receive my response to it.

2. I would ask that you allow my Reply since  
I am responding within 1 day of receipt of the  
Motion to Compel.

(Just to note, it also took 6 days to  
receive the Answers and New Matter and Preliminary  
Objections, which were filed December 12, 2017,

but did not arrive in the mail until December 18, 2017. They were sent in one package, postmarked December 13, 2017, US Postage, Pitney Bowes, then a second postmark on December 14, 2017, adding 18 cents postage. (It arrived on December 18, 2017.)

3. I did not receive Exhibit A or Exhibit B so I am assuming that a photocopy was attached, rather than a restatement of my objections.
4. Due to the delay in receiving this Motion to Compel, I will answer the objected to questions to the best of my ability, as I have done with all of my answers.
5. I am enclosing those answers with a copy of this ~~Reply~~ Reply to Ms. Leptostki.

Respectfully submitted,

*Lynn Force*

Dated: September 13, 2018

Lynn Force

1387 University Drive  
State College, PA 16801  
(814) 237-0578

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West Penn Power Company

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Certificate of Service

I hereby certify that I have this day served a true copy of the Reply to the Motion to Compel of West Penn Power Company upon the individuals listed below, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

Service by First Class Mail as follows:

Lauren M. Lepkoski, Esq.

Tori L. Giester, Esq.

First Energy Service Company

2800 Pottsville Pike

P.O. Box 16001

Reading, Pennsylvania 19612-6001

Administrative Law Judge Jeffrey A. Watson

Pennsylvania Public Utility Commission

Pratt Place, Suite 220

301 Fifth Ave.

Pittsburgh, PA 15222

Dated: September 13, 2018

Lynn Force

Lynn Force

1387 University Drive

State College, PA 16801

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SECRETARY'S BUREAU

Before the  
Pennsylvania Public Utility Commission

Lynn Force

v.

West Penn Power Company

Docket No. C-2017-2634987

Certificate of Service

I hereby certify that I have this day served a true copy of Answers to Questions 2.c through 2.h. and Question 3. of the Interrogatories and Requests for Production of Documents of West Penn Power Company to Lynn Force, Set I upon the individuals listed below, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

Service by First Class Mail as follows:

Lauren M. Lepkosti, Esq.

Tori L. Giester, Esq.

First Energy Service Company

2800 Pottsville Pike

P.O. Box 16001

Reading, Pennsylvania 19612-6001

Dated: September 13, 2018

Lynn Force

Lynn Force

1387 University Drive

State College, PA 16801

(814) 237-0578

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Pennsylvania Public Utility Commission  
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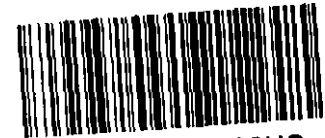
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