

Lauren M. Lepkoski, Esq.  
(610) 921-6203  
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October 11, 2018

**VIA ELECTRONIC FILING**

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


**Re: Diana Cook v. West Penn Power Company**  
**Docket No. C-2018-3003051**

Dear Secretary Chiavetta:

Enclosed please find the Motion to Compel of West Penn Power Company with regard to the above-captioned matter. This document has been served on the Complainant as shown in the Certificate of Service.

Please contact me if you have any questions regarding this matter.

Very truly yours,

  
Lauren M. Lepkoski

krak  
Enclosures

c: As Per Certificate of Service

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**DIANA COOK**

**V.**

**WEST PENN POWER COMPANY**

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**Docket No. C-2018-3003051**

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**NOTICE TO PLEAD**

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TO: Diana Cook

Pursuant to 52 Pa. Code § 5.102(b), you are hereby notified that, if you do not file a written response denying or correcting the enclosed Motion to Compel of West Penn Power Company within **five (5) days** from the service of the Notice, the facts set forth by West Penn Power Company in the Motion may be deemed to be true, thereby requirement no other proof. All pleading, such as a Reply to Motion, must be filed with the Secretary of the Pennsylvania Public Utility Commission, with a copy service to counsel for West Penn Power Company, and where applicable, the Administrative Law Judge presiding over the case.

File with:

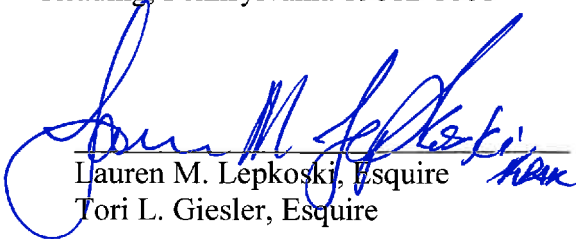
Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
PO Box 3265  
Harrisburg, PA 17105-3265

With a copy to:

Administrative Law Judge Jeffrey A. Watson  
Pennsylvania Public Utility Commission  
301 5<sup>th</sup> Avenue, Suite 220  
Pittsburgh, PA 15222

Lauren M. Lepkoski  
Tori L. Giesler  
FirstEnergy Service Company  
2800 Pottsville Pike  
P.O. Box 16001  
Reading, Pennsylvania 19612-6001

Date: October 10, 2018

  
\_\_\_\_\_  
Lauren M. Lepkoski, Esquire  
Tori L. Giesler, Esquire

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

<b>DIANA COOK</b>	:	
	:	
<b>V.</b>	:	<b>Docket No. C-2018-3003051</b>
	:	
<b>WEST PENN POWER COMPANY</b>	:	

**MOTION OF WEST PENN POWER COMPANY TO COMPEL RESPONSES TO  
INTERROGATORIES AND DOCUMENT REQUESTS**

TO THE PENNSYLVANIA PUBLIC UTILITY COMMISSION:

West Penn Power Company (“West Penn” or the “Company”) by and through its attorneys, Lauren M. Lepkoski and Tori L. Giesler, and pursuant to 52 Pa. Code §§ 5.371-5.372, hereby files this Motion to compel Diana Cook (“Complainant”) to provide full and complete responses to interrogatories and document requests issued by the Company on September 13, 2018. In support thereof, the Company avers as follows:

**I. BACKGROUND**

1. On June 22, 2018, the Complainant filed a Formal Complaint with the Pennsylvania Public Utility Commission (“Commission”) regarding 2788 Martindale Road, Scenery Hill, Pennsylvania 15360 (“Service Location”).

2. On July 17, 2018, the Company filed its Answer and New Matter denying the material allegations. On the same day, the Company also filed Preliminary Objections to the Formal Complaint.

3. On August 23, 2018, a Motion Judge Assignment Notice was issued and Administrative Law Judge (“ALJ”) Jeffrey A. Watson was assigned as the Presiding Officer in the above-captioned proceeding.

4. On August 29, 2018, ALJ Watson issued an Interim Order, which denied the Company’s Preliminary Objections.

5. On September 13, 2018, in accordance with 52 Pa. Code § 5.341, the Company issued to the Complainant interrogatories and document requests (“Discovery Requests”) via first class mail. In its Discovery Requests, the Company sought information and documents related to the Complainant’s allegations regarding the Company’s smart meters.

6. On October 2, 2018, the Company received a letter from Complainant reiterating many of the claims in the Formal Complaint and objecting to all of the Company’s Discovery Requests. The Complainant objected on the grounds that it would be “impossible” to respond to the Company’s Discovery Requests within the timeframe provided without “attorney assistance.”

7. A full copy of the Company’s Discovery Requests is attached as Exhibit A.

8. A full copy of the Complainants’ Objections to the Company’s Discovery Requests is attached as Exhibit B.

9. At no point did the Complainants contact the Company to discuss the Discovery Requests or to seek an extension of time to respond to the Discovery Requests.

## **II. MOTION TO COMPEL**

10. Complainant generally objects to all of the Company’s discovery requests, arguing that she should not be required to respond because it would be “impossible” to do so without attorney assistance within the timeframe provided by the Company. This objection is without merit. The timeline provided for responses is not set by the Company. Rather, it is the

Commission's rules that set those deadlines. *See* 52 Pa. Code § 5.342(d), (e). The Complainant's displeasure with the amount of time provided by the Commission's rules for a response does not excuse her from responding to the Discovery Requests whatsoever, especially considering that Complainant did not even attempt to contact the Company to seek an extension of time to respond to the Discovery Requests. Moreover, Complainant's non-responsive letter containing her objection was not itself filed timely. As set forth below, the Company's Discovery Requests are within the permissible scope of discovery and do not exceed the limits imposed by the Commission's rules. Accordingly, Complainant's general objection that the Commission's rules do not provide her enough time to provide responses should be rejected.

11. Discoverable matter under the Commission's regulations is matter that is relevant and unprivileged. 66 Pa.C.S. § 333(d). The standard for permissible discovery is set forth in the Commission's regulations at 52 Pa. Code § 5.321(c) as follows:

**§ 5.321. Scope.**

(c) *Scope.* Subject to this subchapter, a party may obtain discovery regarding any matter, not privileged, which is relevant to the subject matter involved in the pending action, whether it relates to the claim or defense of the party seeking discovery or to the claim or defense of another party, including the existence, description, nature, content, custody, condition and location of any books, documents, or other tangible things and the identity and location of persons having knowledge of a discoverable matter. It is not ground for objection that the information sought will be inadmissible at hearing if the information sought appears reasonably calculated to lead to the discovery of admissible evidence.

12. There are limitations on discovery. Those limitations are set forth in the Commission's regulations at 52 Pa. Code § 5.361(a) - (c) as follows:

**§ 5.361. Limitation of scope of discovery and deposition.**

(a) Discovery or deposition is not permitted which:

(1) Is sought in bad faith.

(2) Would cause unreasonable annoyance, embarrassment, oppression, burden or expense to the deponent, a person or party.

(3) Relates to matter which is privileged.

(4) Would require the making of an unreasonable investigation by the deponent, a party or witness.

(b) In rate proceedings, discovery is not limited under subsection (a) solely because the discovery request requires the compilation of data or information which the answering party does not maintain in the format requested, in the normal course of business, or because the discovery request requires that the answering party make a special study or analysis, if the study or analysis cannot reasonably be conducted by the party making the request.

(c) If the information requested has been previously provided, the answering party shall specify the location of the information.

13. Discovery may be obtained regarding any matter relevant to the subject matter.

Relevant evidence is evidence that tends to make an act at issue more or less probable. Moreover, evidence is relevant if it advances the inquiry in some degree and, thus, has probative value.

Although the law does not furnish an absolute test of relevancy, the Pennsylvania Supreme Court follows a two-part analysis for determining relevance. In *Commonwealth v. Stewart*, 461 Pa. 274, 336 A.2d 282 (1975), the Court held that “[i]t must be determined first if the inference sought to be raised by the evidence bears upon a matter at issue in this case and, second, whether the evidence renders the desired inference more probable than it would be without the evidence. *Id.* at 284.

14. The information sought here by the Company is relatively simple and straightforward. It is directly relevant and material to the issues raised by the Complainant in his Formal Complaint and previous correspondence Complainant has sent to the Company providing the basis for his denial of a smart meter. The Company is entitled to the requested information to enable it to fully investigate what information the Complainant relied on to make the specific and detailed allegations he did in his Formal Complaint.

15. The Commission's Regulations at 52 Pa. Code § 5.371 address the consequences of a participant's failure to comply with the Commission's discovery regulations. Section 5.371 provides that:

- (a) The Commission or the presiding officer may, on motion, make an appropriate order if one of the following occurs:
  - (1) A party fails to appear, answer, file sufficient answers, file objections, make a designation or otherwise respond to discovery requests, as required under this subchapter.

16. Further, 52 Pa. Code § 5.372 provides that the presiding officer may impose appropriate sanctions upon a party found to be found in violation of the obligations set forth in the Commission's Regulations.

17. The Company requests that the Complainants be directed to provide full and complete responses to the Discovery Requests to be received by the undersigned counsel for the Company within five business days after entry of an Order Granting the Motion to Compel.

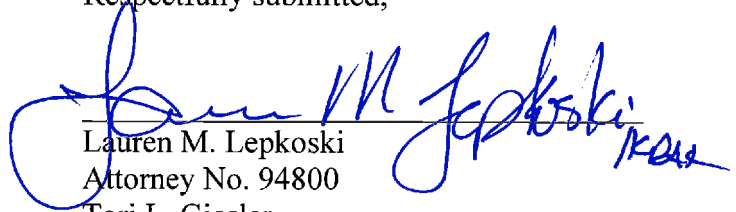
18. In the event the Complainants are directed by the Commission, but fail to respond to the Company's Discovery Requests, the Company respectfully requests that the Complaint against the Company be dismissed in its entirety.

WHEREFORE, West Penn Power Company respectfully requests that the Commission issue an Order compelling the Complainant to fully and completely respond to the Discovery Requests such that the responses are received by counsel for the Company no later than five business days after entry of an Order on the Motion to Compel. Further, in the event the

Complainant does not comply with the Order directed by the Commission and fails to respond to the Company's Discovery Requests, the Company respectfully requests that the Commission dismiss in its entirety the Complaint of Diana Cook.

Respectfully submitted,

Dated: October 11, 2018



Lauren M. Lepkoski

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Tori L. Giesler

Attorney No. 207742

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Counsel for West Penn Power Company



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PO Box 16001  
Reading, PA 19612-6001

Lauren M. Lepkoski, Esq.  
(610) 921-6203  
(330) 315-9263 (Fax)

September 13, 2018

**VIA FIRST CLASS MAIL**

Diana Cook  
2788 Martindale Road  
Scenery Hill, PA 15360

**Re: Diana Cook v. West Penn Power Company**  
**Docket No. C-2018-3003051**

Dear Ms. Cook:

Enclosed please find the Interrogatories and Requests for Production of Documents (Set I) to Diana Cook. Pursuant to 52 Pa. Code §§ 5.341 and 5.349, *et seq.*, your answers are due within twenty days of service of this letter (October 3, 2018). In addition, any objections are due within ten days of service of this letter (September 24, 2018). This document has been served as indicated within the Certificate of Service.

Very truly yours,

A handwritten signature in black ink, appearing to read "Lm. Lepkoski".

Lauren M. Lepkoski

Enclosures

c: As Per Certificate of Service  
The Honorable Jeffrey Watson, Public Utility Commission (Cover Letter and Certificate)  
Rosemary Chiavetta, Esq., Public Utility Commission (Cover Letter and Certificate)

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**DIANA COOK**

:

:

v.

:

**Docket No. C-2018-3003051**

:

**WEST PENN POWER COMPANY**

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**INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS OF  
WEST PENN POWER COMPANY TO DIANA COOK, SET I**

West Penn Power Company hereby propounds these Interrogatories and Requests for Production of Documents (Set I) to Diana Cook (the "Complainant"). Telephone or other contact concerning availability and timing of formal responses is encouraged. The answer to each interrogatory should be started on a new page. The answers should restate the question asked and indicate the person(s) supplying the information.

Pursuant to 52 Pa. Code § 5.342, you must send your answers to me within 20 days (October 3, 2018) and objections within 10 days (September 24, 2018). Your answers and objections should not be filed with the Pennsylvania Public Utility Commission. You should only file the cover letter and certificate of service, with the Commission's Secretary Rosemary Chiavetta and send a copy to Administrative Law Judge Jeffrey A. Watson. If you have any objection to any of the interrogatories or the request for documents, please identify the interrogatory or request and state your objection in full as to why you should not have to answer/produce it. Any objection not raised within the 10-day period provided for by 52 Pa. Code § 5.342(c) will be deemed waived and you will not be permitted to raise the objection at a later time.

Dated: September 13, 2018

**INSTRUCTIONS**

A. In answering these Interrogatories and Requests for Production of Documents, 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.

B. Other than for the reasons identified herein, you must provide an answer to all Interrogatories and Requests for Production of Documents. If the answer to the question is “none” or “unknown,” such statement must be written in the answer. If you consider the question to be inapplicable, “N/A” must be written in the answer. If an answer is omitted because of a claim of privilege, the basis of privilege is to be stated.

C. If the answer to any of the Interrogatories and Requests for Production of Documents is that you lack knowledge of some or all of the requested information, describe all efforts made by you to obtain the information necessary to answer that Interrogatory or Request.

D. These Interrogatories and Requests for Production of Documents are to be deemed continuing in nature, and you shall promptly supply, by way of supplemental response, any additional responsive information that may become known to you or anyone acting on your behalf after your answers have been prepared or served.

E. As used herein, the terms “Complainant” and “you” refer to Diana Cook and her attorneys, agents, or representatives.

F. As used herein, the terms “Company” or “Respondent” refer to West Penn Power Company, and any agent, agency, or affiliate thereof.

G. As used herein, the term “proceeding” refers to the instant complaint proceeding at the Pennsylvania Public Utility Commission at Docket No. C-2018-3003051.

H. As used herein, the terms “service location,” “property,” or “home” refer to your service address of 2788 Martindale Road, Scenery Hill, Pennsylvania 15360.

I. As used herein, the term “household” refers to you and all other individuals who reside at the service location.

J. As used herein, the terms “document” or “documentation” includes any written, printed, typed, recorded, or graphic matter, whether produced or reproduced or stored on paper, cards, tapes, film, electronic facsimile, computer storage devices or any other devices or media, including, but not limited to papers; books; letters; photographs; objects; tangible things; correspondence; e-mails; websites; webpages; telegrams; cables; telex messages; memoranda; medical records; notes; notations; records; work papers; transcripts; minutes; reports and recordings of telephone or other conversations, or of interviews, or of conferences, or of other meetings; affidavits; statements; opinions; proposals; reports; surveys; plans; studies; analyses; audits; evaluations; contracts; agreements; journals; statistical records; invoices; receipts; desk calendars; appointment books; diaries; lists; tabulations; summaries; sound recordings; computer printouts; data processing input and output; microfilms; all records kept by electronic, photographic, or mechanical means; and things similar to any of the foregoing, however denominated. When one or more of the foregoing documents is requested or referred to, the request or reference shall include, but is not limited to, the original and each and every copy and draft thereof having writings, notations, corrections, or markings unique to such copy or draft.

K. As used herein, all other words are to be given their ordinary and usual meanings, according to a current edition of Webster’s Dictionary.

**INTERROGATORIES OF WEST PENN POWER COMPANY TO DIANA COOK, SET I**

1. Are you claiming that the installation of a smart meter at your property would cause or contribute to an adverse health condition for any member of your household?
2. If the answer to question 1 is yes, please provide the following information for each household member whose health you claim will be affected:
  - a. Name;
  - b. Age;
  - c. The specific health condition that you believe would be caused by or contributed to as a result of the smart meter being installed;
  - d. Whether the household member is already experiencing the specific health condition and, if so, the date on which the condition was first experienced and the date on which the condition was first diagnosed by a medical doctor;
  - e. Whether the household member has experienced the specific health condition within the last four years;
  - f. Any medication prescribed to the household member; and
  - g. Whether the household member has visited a medical professional for the specific health condition, and if so, the name, address, and phone number of the medical professional and the date of the visit(s) to the medical professional.
  - h. Whether a medical doctor has determined that the installation of a smart meter would cause or contribute to the specific health condition;

- i. Any other health conditions that the household member has experienced or is experiencing and when each condition was first experienced and was first diagnosed by a medical doctor.
3. Please explain how the installation of a smart meter would cause or contribute to a health condition for any person in your household. Be as specific as possible.
4. Please provide the following information regarding your view that the installation of a smart meter at your home would cause or contribute to a health condition for any person in your household.
  - a. Please identify each document you rely on in support of your position.
  - b. Do you intend to rely on these documents at the time of the hearing in this proceeding?
  - c. Please describe in detail all information you have to support this position.
5. Do you believe the installation of a smart meter at your property would create safety concerns for a member of your household?
6. If the answer to question 5 is yes, please specifically identify each of your safety concerns related to smart meters.
7. Please provide the following information regarding your position that the installation of a smart meter would create safety concerns:
  - a. Please identify each document you rely on in support of the position.

- b. Do you intend to rely on these documents at the time of the hearing in this proceeding?
  - c. Please describe in detail all information you have to support this position.
8. Are there any cordless phones used in your home?
- a. For each cordless phone in your home, please provide the name of the phone manufacturer and the model.
9. Do you use a cellular phone?
- a. If yes, please provide the names of the cell phone manufacturer and model (for example, Apple i-Phone 7S).
  - b. Does anyone else in your home use a cellular phone?
  - c. How many cellular phones are in use at your home?
  - d. For each cellular phone used by a member of your household, please provide the name of the cell phone manufacturer and the phone model.
10. Is there satellite television at your home?
- a. If yes, please provide the name of the satellite television provider (for example, Direct TV).
  - b. If yes, where is your satellite disk located?
11. Is there a laptop computer at the service location?

- a. If yes, where is it located?
12. Do you have a wifi network in your home?
    - a. If so, where is your wifi router located?
  13. To your knowledge, has a smart meter been installed by the Company at your property?
  14. Please describe in detail how you believe a smart meter operates.
  15. In your complaint, you state that “[c]ontinual exposure to this wireless electromagnet impulse continually being emitted will potentially place [your husband] at high risk for additional complication.” Please provide the following information related to this statement:
    - a. What documents do you rely on in support of this statement?
    - b. Do you intend to rely on these documents at the time of the hearing in this proceeding?
    - c. Please describe in detail the information you have to support this statement.
  16. Please list the specific issues you intend to raise at the hearing in this proceeding.
  17. Please identify the legal support, including specific citations, for each issue identified in question 16.
  18. Please list the factual support for each issue identified in question 16.

19. Please provide the following information for all witnesses you intend to call to testify at the hearing in this proceeding.
  - a. Provide the full name of the witness.
  - b. Provide the address and telephone number of the witness.
  - c. Provide the title or position held by the witness.
  - d. Provide the educational background of the witness.
  - e. Provide the employment background of the witness.
  - f. Provide the scope of the testimony for the witness.
20. Would any witness identified in question 19 be offered as an expert?
  - a. If yes, provide the curriculum vitae of the witness and a summary of the testimony the expert witness is expected to provide.
21. Please describe in detail your educational background.
  - a. Please list any relevant certificates, trainings, or degrees that you obtained.
  - b. Please provide a description of the certificate, training, or degree.
  - c. Please provide the date that any certificate, training, or degree was obtained.
  - d. Please provide the name and address of the institution which provided the certificate, training, or degree.
22. Please describe in detail your employment history.

- a. Please provide your employer name and address.
- b. Please provide the title of your position.

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- c. Please provide the dates of your employment.
- d. Please provide the duties performed in your position.

**REQUESTS FOR PRODUCTION OF DOCUMENTS OF WEST PENN POWER  
COMPANY TO DIANA COOK, SET I**

23. Please provide copies of all documentation supporting your position that the installation of a smart meter at your home would cause or contribute to an adverse health condition in any member of your household.
24. Please provide copies of all documentation associated with visits by members of your household to a medical professional related to the health conditions identified in question 23, including but not limited to any and all medical records, medical visit reports, and notes and letters from medical doctors or other health care professionals.
25. Please provide copies of all documentation you intend to refer to at the hearing in this proceeding related to smart meters and/or radio frequency fields and health.
26. Please provide copies of all documentation supporting your position that smart meters would create safety issues for you or members of your household.
27. Please provide copies of all documentation you intend to refer to at the hearing in this proceeding related to the safety concerns of smart meters.
28. For each cellular telephone used by a member of your household, please provide a complete copy of the bills you received from your cellular telephone provider for the past 12 months.

29. Please provide a copy of all proposed exhibits you intend to submit for the hearing in this proceeding.
30. Please provide copies of all documentation you are relying upon in support of your positions in this proceeding.
31. Please provide copies of all documentation you referenced, referred to, or otherwise relied upon in preparing your responses to these discovery requests.

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**DIANA COOK**

**v.**

**WEST PENN POWER COMPANY**

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**Docket No. C-2018-3003051**

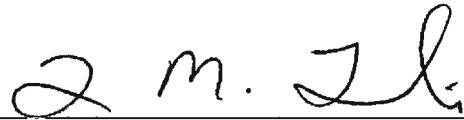
**CERTIFICATE OF SERVICE**

I hereby certify that I have this day served a true copy of the Interrogatories and Requests for Production of Documents of West Penn Power Company to Diana Cook 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, postage prepaid, as follows:

Diana Cook  
2788 Martindale Road  
Scenery Hill, PA 15360

Dated: September 13, 2018



Lauren M. Lepkoski  
FirstEnergy Service Company  
2800 Pottsville Pike  
P.O. Box 16001  
Reading, Pennsylvania 19612-6001  
(610) 921-6203  
llepkoski@firstenergycorp.com

Lauren M. Leposki, Esq  
Re: Diana Cook v. West Penn Power Company  
Docket no. C-2018-3003051

My name is Diana Cook and I am writing today over the harassment I have been receiving over the smart meter installation requirement that Pennsylvania has mandated.

I filed a formal complaint with the PUC over this matter and have since received a long list of requirements from them which could only be fulfilled with the assistance of an attorney. 31 items to be exact. Impossible time frame without attorney assistance.

My husband suffers from a rare neurological illness called Syringomyelia and has undergone a 12-hour surgical procedure in order to save his life.

First and foremost, Mr. Robert Godshall along with other PA representatives took an oath to uphold the constitution. By forcing smart meters they violated the constitution and our fourth amendment rights. I have never seen one long-term study involving smart meters and human beings nor do I feel one study such as that has ever been conducted. They keep comparing smart meters to cell phones, there is no comparison. We do own cell phones but I will add that we place them on airplane mode when not in use. Can we also do that with a smart meter?

I do not feel that in order to simply keep my old meter that I should have to hire an attorney pay money out of pocket because an unconstitutional requirement was passed and laws were broken in the first place.

These meters are causing many health problems some of which may not be known for years to come. These meters are an invasion of privacy as they collect personal information continuously and send it out. Additionally, our home wiring is not made to handle the smart meters and many house fires are now occurring.

My electric bills are current and always have been. There should never have been a mandate on these meters because everyone is different regarding health matters.

We should have the right to live peacefully without fear and harassment from our government.

My husband's name is Robert Cook and his Dr was Edward Prostko.

The letter sent to me with the list of demands was sent from First Energy with a docket No. C-2018-3003051

If a smart meter is required or an electric shut off and I am forced to accept the smart meter and anything changes regarding my husband's health, I will hold all of these representatives personally accountable and I will seek justice. We are not their human experiment.

Thank you kindly for taking the time to listen to my concerns,

Diana M. Cook



RECEIVED  
OCT 02 2018  
LEGAL DEPT.

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**DIANA COOK**

**V.**

**WEST PENN POWER COMPANY**

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**Docket No. C-2018-3003051**

**CERTIFICATE OF SERVICE**

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

Service by First Class Mail, postage prepaid, as follows:

Diana Cook  
2788 Martindale Road  
Scenery Hill, PA 15360

Administrative Law Judge Jeffrey A. Watson  
Pennsylvania Public Utility Commission  
301 5<sup>th</sup> Avenue, Suite 220  
Pittsburgh, PA 15222

Dated: October 11, 2018



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[tgiesler@firstenergycorp.com](mailto:tgiesler@firstenergycorp.com)