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October 26, 2018

VIA ELECTRONIC FILING

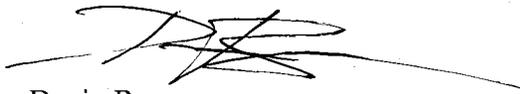
Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor North
P.O. Box 3265
Harrisburg, PA 17105-3265

Re: Evangeline Hoffman-Lorah v. PPL Electric Utilities Corporation
Docket No. C-2018-2644957

Dear Secretary Chiavetta:

Enclosed for filing is the Reply Brief of PPL Electric Utilities Corporation in the above-referenced proceeding. Copies will be provided as indicated on the Certificate of Service.

Respectfully submitted,



Devin Ryan

DTR/jl
Enclosures

cc: Honorable Elizabeth Barnes
Certificate of Service

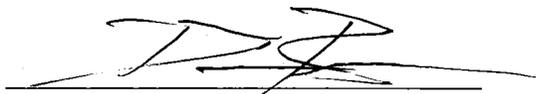
CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been served upon the following persons, in the manner indicated, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

VIA FIRST CLASS MAIL

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Date: October 26, 2018


Devin T. Ryan

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Evangeline Hoffman-Lorah,

Complainant,

v.

PPL Electric Utilities Corporation,

Respondent.

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Docket No. C-2018-2644957

**REPLY BRIEF OF
PPL ELECTRIC UTILITIES CORPORATION**

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I. INTRODUCTION

On January 29, 2018, PPL Electric Utilities Corporation (“PPL Electric” or the “Company”) was served with the above-captioned Formal Complaint filed by Evangeline Hoffman-Lorah (“Complainant”) with the Pennsylvania Public Utility Commission (“Commission”). In her Complaint, the Complainant contests PPL Electric’s planned installation of a new automated metering infrastructure (“AMI”) meter at her property, 1635 4th Street, Bethlehem, Pennsylvania.

The Complainant submitted her Main Brief on September 24, 2018, and PPL Electric submitted its Main Brief on October 5, 2018.

On October 17, 2018, Administrative Law Judge Elizabeth H. Barnes (“ALJ”) extended the due date for Reply Briefs from October 19, 2018, to October 26, 2018.

As explained in PPL Electric’s Main Brief, the Complaint should be denied in its entirety and with prejudice because the Complainant has failed to sustain her burden of proof that installing the new AMI meter would violate the Public Utility Code or any Commission regulation or order. The Company is legally required to install the new AMI meters for all customers, and installing the new AMI meter would not constitute unsafe or unreasonable service in violation of 66 Pa. C.S. § 1501.

Herein, PPL Electric submits its Reply Brief, which is limited to addressing any arguments or issues raised by the Complainant’s Main Brief that were not previously addressed by the Company.

II. SUMMARY OF ARGUMENT

The Complainant’s arguments in her Main Brief should be rejected. To begin, the Complainant mischaracterizes the record and unreasonably relies upon certain exhibits and

testimony. For example, the Complainant alleges that her medical records prove a diagnosis of electromagnetic hypersensitivity (“EHS”). However, the Complainant’s own medical records reveal that no such diagnosis was made; her medical records do not even diagnose the cause of her tinnitus. Further, the Company’s expert scientific and medical testimony and exhibits refute Complainant’s claims that exposure to low-level radiofrequency (“RF”) fields have been scientifically proven to be health risks and that agencies have advised people to limit exposure to RF fields. In fact, the experts’ evaluations and conclusions are fully consistent with the findings of mainstream public health entities, including the World Health Organization (“WHO”). Moreover, the Complainant’s claims are based on uncorroborated hearsay, which should be entirely disregarded. Further, the credible evidence presented by the Company proves that, contrary to the Complainant’s allegations, the new AMI meters comply with the Federal Communications Commission’s (“FCC”) regulations, are certified by Underwriters Laboratories (“UL”), do not send transmissions 22,500 times per day, and are not fire risks.

In addition, the Complainant’s allegation that the new AMI meters record electric usage inaccurately is entirely without merit. The record demonstrates that PPL Electric tests all of the new AMI meters for accuracy and that these meters are actually much more accurate than the analog meters preferred by the Complainant. Also, to the extent that the Complainant believes that the new AMI meter is inaccurate after it is installed, she can request a meter test.

Furthermore, the Complainant makes several flawed legal arguments in support of her requested opt-out of the new AMI meter installation.

First, contrary to the Complainant’s allegation, there is no opt-out of the AMI meter installation under Act 129. The plain language of Section 2807(f)(2) of the Public Utility Code unambiguously states that electric distribution companies (“EDCs”), like PPL Electric, “shall”

install the new AMI meters. 66 Pa. C.S. § 2807(f)(2). Therefore, the Company must install the new AMI meters.

Second, Act 129 was not drafted as an opt-in bill. The Complainant mistakenly relies upon Section 2807(f)(2)(i) in support of her argument, which simply allows a customer to request a smart meter if he or she wants one installed sooner than the meter would be installed pursuant to the EDC's deployment schedule. Therefore, as mentioned previously, the plain language of Act 129 requires the installation of the new AMI meters.

Third, the Complainant incorrectly asserts that PPL Electric has the burden of proof in this proceeding. As the proponent of a rule or order in this proceeding, the Complainant bears the burden of proof pursuant to Section 332(a) of the Public Utility Code. *See* 66 Pa. C.S. § 332(a).

For these reasons, and as explained in more detail below, the arguments presented in the Complainant's Main Brief should be rejected.

III. REPLY ARGUMENT

A. THE COMPLAINANT MISCHARACTERIZES THE RECORD AND UNREASONABLY RELIES UPON CERTAIN EXHIBITS AND TESTIMONY

In her Main Brief, the Complainant mischaracterizes the record and unreasonably relies upon certain exhibits and testimony.

First, the Complainant incorrectly claims that her medical records prove a diagnosis of EHS and that doctors have ruled out other causes of her symptoms. (Complainant's MB at 5-6, 11) The only medical doctor who testified in this case, Dr. Mark Israel, examined these records and explained that they "state that the patient 'thinks she has EMF sensitivity' and is 'concerned about EMF sensitivity.'" (PPL Electric Statement No. 2, p. 7, lines 22-23) These medical

records, however, “do not include any description of the internist evaluating or diagnosing electromagnetic sensitivity.” (PPL Electric Statement No. 2, p. 7, line 23 to p. 8, line 1) (emphasis added) Moreover, the records state that the Complainant “was examined by an ENT (ear/nose/throat) expert who ‘did not specify possible cause of tinnitus.’” (PPL Electric Statement No. 2, p. 8, lines 3-5) Similarly, when the Complainant claims that she suffers “heart palpitations” from exposure to the new AMI meters (see Complainant’s MB at 7), her medical records state otherwise. Specifically, the Complainant’s medical records report that she “denies fatigue, that “her heart rate and rhythm is ‘regular,’” and that “her mood [is] ‘upbeat & stable.’” (PPL Electric Statement No. 1, p. 8, lines 1-3) Thus, the Complainant’s medical records contradict her claims that she has been diagnosed with EHS and that EHS is the cause of her symptoms.

Second, the Complainant erroneously claims that exposure to low-level RF fields have been “scientifically proven to be health risks” and that the WHO and other agencies have advised people to limit exposure to these “carcinogenic” fields. (Complainant’s MB at 6-8, 10-11) There is no reliable scientific or medical basis to support the Complainant’s claim that the new AMI meters cause, contribute to, or exacerbate adverse health effects. (PPL MB at 13-23) In this proceeding, the Company has offered thorough, credible, and reliable evidence to rebut the Complainant’s claims about the alleged adverse health effects of the new AMI meter. (PPL MB at 13-23) The Company has presented overwhelming evidence that its expert witnesses, Dr. Christopher Davis and Dr. Mark Israel, possess exceptional qualifications and experience, that they are eminent and highly regarded in their scientific communities, and that their opinions are reliable and sound. (PPL MB at 13-14, 17-19) Dr. Davis and Dr. Israel testified at length about

their thorough and detailed evaluations of the relevant scientific information on its merits. (See PPL Electric Statement Nos. 1 and 2)

Moreover, contrary to the Complainant's allegations, the experts' evaluations and conclusions are actually consistent with the findings of mainstream public health entities, including the WHO. (See PPL Electric Statement No. 2, p. 12, lines 15-20) Similar conclusions have been reached in recent years by multiple expert groups around the globe, federal and public health agencies in the U.S., and state public utility commissions. (See PPL Electric Exhibits MI-1, MI-2, MI-3) Furthermore, neither the WHO nor its agency, the IARC, has concluded that RF fields from AMI meters can cause cancer. (PPL Electric Statement No. 2, p. 12, lines 4-6) IARC convened a working group in 2011, which found that RF fields from mobile phones were "possibly carcinogenic" based on what it described as "limited evidence," but did not find that RF fields from mobile phones were either "carcinogenic" or even "probably carcinogenic" under the IARC classification system. (PPL Electric Statement No. 2, p. 12, lines 7-11) The WHO reviewed the IARC's findings and concluded that "[t]o date, no adverse health effects have been established as being caused by mobile phone use." (PPL Electric Statement No. 2, p. 12, lines 15-20)

With regard to RF fields from smart meters, the 2011 IARC review did not classify them as being carcinogenic, probably carcinogenic or even possibly carcinogenic. Instead, IARC concluded that for these environmental exposures to RF fields, the research was "inadequate" to reach conclusions about cancer causation. (PPL Electric Statement No. 2, p. 12, lines 11-14) Therefore, as the expert witnesses correctly concluded in this proceeding, there is no reliable scientific or medical basis to conclude that the new AMI meters cause, contribute to, or exacerbate adverse health effects.

Third, the Complainant improperly relies on uncorroborated hearsay in support of her claims. (Complainant's MB at 5-11) Apart from the many hearsay documents previously addressed in PPL Electric's Main Brief (see PPL MB at 23-31), the Complainant claims in her Main Brief that "[o]ther people in town and in our household can hear the audible vibrations emanating from [the new AMI meters] and have testified to that effect." (Complainant's MB at 11) No such persons testified in this proceeding. Accordingly, these alleged statements by others in the neighborhood and other members of her household are hearsay. Because the hearsay statements are not corroborated by any other evidence in the record, such statements should not be relied on to make any findings of fact in this case. (See PPL MB at 23-25) Therefore, the alleged statements should be entirely disregarded.

Fourth, the new AMI meters comply with FCC regulations and are certified by UL, contrary to the Complainant's allegations. (Complainant's MB at 7, 9, 11) As explained by Dr. Christopher Davis, one of PPL Electric's expert witnesses, "the RF field levels from the AMI meters being used by PPL Electric more than comply with the applicable FCC RF exposure limit." (PPL Electric Statement No. 1, p. 13, lines 8-10) Indeed, Dr. Davis calculated that the levels of RF fields from the AMI meters are 98,000 times lower than the RF exposure safety limits established by the FCC. (PPL Electric Statement No. 1, p. 13, lines 8-12; see PPL Electric Exhibit CD-2) Additionally, PPL Electric witness Scott Larson, who is a Senior Engineer with the Company, testified that the new AMI meters meet the certifications and standards issued by the American National Standards Institute ("ANSI") and UL, including the "most important" UL standard—UL G-735. (Tr. 44, 53) Therefore, the Complainant's claims are unfounded.

Fifth, the new AMI meters do not send transmissions "22,500" times per day, as alleged by the Complainant. (Complainant's MB at 7) As Dr. Davis testified, the Company's new AMI

meter only transmits RF signals for a total of 84 seconds over the course of 24 hours, with individual signal durations of only 46 to 63 milliseconds. (PPL Electric Statement No. 1, p. 7, lines 21-23) This equates to between 1,333 and 1,826 transmissions per day, not 22,500.

Sixth, the Complainant incorrectly avers that the new AMI meters are fire risks because they “do not have the safe guards of the old analog meters.” (Complainant’s MB at 11) To the contrary, as explained in the Company’s Main Brief, the new AMI meters are better equipped to prevent fires than the current powerline carrier (“PLC”) meters. (PPL MB at 32-33) For example, PPL Electric takes 15-minute interval temperature readings from the new AMI meter, so it can track the meter’s temperature and identify any current issues or problematic trends. (PPL MB at 32) If the Company detects an issue with the meter’s temperature, PPL Electric can then dispatch a technician to investigate. (PPL MB at 32) However, the Complainant’s current meter does not have the ability to transmit its temperature to PPL Electric. (PPL MB at 32) Further, the new AMI meter selected by PPL Electric was the only meter on the market met the Company’s stringent testing and standards, including that the meter’s materials be able to withstand a thermal index of 160 degrees Celsius before breaking down. (PPL MB at 33) Thus, the new AMI meter is better equipped to prevent fires than the Complainant’s current meter.

For these reasons, the Complainant’s arguments in her Main Brief should be rejected because she mischaracterizes the record and unreasonably relies upon certain testimony and exhibits.

B. THE COMPLAINANT’S CONTENTION THAT THE NEW AMI METERS RECORD ELECTRIC USAGE INACCURATELY IS WITHOUT MERIT

The Complainant alleges in her Main Brief that the new AMI meters record electric usage inaccurately and lead to inaccurate bills. (Complainant’s MB at 8) Specifically, the Complainant claims that these meters cause “false readings” that produce “outrageous electric

bills.” (Complainant’s MB at 8) As alleged support, the Complainant has submitted articles from a couple websites, which claim that AMI meters are inaccurate. (See Complainant’s Exhibits 4 and 22) The Complainant’s argument is without merit.

PPL Electric presented detailed testimony refuting the Complainant’s contention. PPL Electric witness Scott Larson testified that the new AMI meter is actually “much, much more accurate than some of the older meters.” (Tr. 59) Indeed, “[t]he new standard of meter accuracy” is currently “0.15 percent accuracy,” meaning that the meter cannot “vary off of 100 percent accuracy more than .15 either way.” (Tr. 59) Importantly, every one of the new AMI meters “is tested to ensure that level of accuracy.” (Tr. 59) In contrast, the analog meters have spinning disks inside that, due to age, corrosion, or both, have a tendency to slow. (Tr. 60) The slowing of these disks actually creates a less accurate meter. (Tr. 60) Therefore, when the less accurate meter is removed and then replaced with the AMI meter, customers may feel like they are being charged more when the reality is that the new AMI meter is recording more accurately. (Tr. 60)

In addition, the Complainant’s concern about meter accuracy is premature. To the extent that the Complainant believes that the new AMI meter is inaccurate after it is installed, she can request a meter test. (Tr. 60) Section 57.22 of the Commission’s regulations prescribes that “[a] public utility shall make a test of the accuracy of registration of a service meter upon the written request of the customer for whom the meter is installed upon payment of the fee specified in” subsection (c). 52 Pa. Code § 57.22(a); *see id.* § 57.22(c) (setting forth the applicable testing fees for watt-hour and demand meters). Further, the Company’s Commission-approved tariff specifies that “[t]he testing and adjustment of meters are made in accordance with any applicable law and any regulation” and that “[t]he company may require customers to pay a fee of \$35.00

for a meter test.” Rule 8.D., Supplement No. 194 to Electric. Pa. P.U.C. No. 201, Sixth Revised Page No. 12. If the test reveals that the meter is not recording usage within the acceptable range, the customer’s bills can be adjusted pursuant to the Commission’s regulations. *See* 52 Pa. Code § 57.24. Thus, the Complainant can request a meter test if, in the future, she believes her new AMI meter is inaccurate.

Finally, the Complainant’s allegations are entirely based on articles whose authors were not called to testify about the veracity of their claims. As explained in PPL Electric’s Main Brief, these documents are unreliable hearsay and should not be used to make any findings of fact. (PPL MB at 23-25) Indeed, PPL Electric presented the only credible evidence on this issue through the testimony of Mr. Larson. (Tr. 59-60) Therefore, the Complainant’s exhibits should be disregarded.

Based on the foregoing, the Complainant’s allegation that the new AMI meters record electric usage inaccurately should be rejected.

C. THE COMPLAINANT’S LEGAL ARGUMENTS ARE FLAWED

The Complainant also makes flawed legal arguments in support of her requested opt-out of the new AMI meter installation. Specifically, the Complainant argues, among other things, that: (1) the installation of the new AMI meter is not mandatory based on comments by certain Pennsylvania legislators; (2) Act 129 was drafted as an opt-in bill; and (3) PPL Electric has the burden of proof to demonstrate that the new AMI meters are safe. (Complainant’s MB at 7-11) None of the Complainant’s legal arguments have merit.

First, as explained in PPL Electric’s Main Brief, there is no opt-out to the new AMI meter installation under Act 129. (PPL MB at 10-12) A few legislators’ comments about the statute do not control the analysis of whether an opt-out is permitted under Act 129. Under the Pennsylvania Statutory Construction Act, “[w]hen the words of a statute are clear and free from

all ambiguity, the letter of it is not to be disregarded under the pretext of pursuing its spirit.” 1 Pa. C.S. § 1921(b). Here, the plain language of Act 129 states that EDCs, like PPL Electric, “shall” install the new AMI meters. See 66 Pa. C.S. § 2807(f)(2) (emphasis added). Importantly, the word “shall” has been declared by Pennsylvania courts to mean “must.” See *Whiteford v. Dep’t of Transp.*, 728 A.2d 1127, 1131 (Pa. Cmwlth. 2001) (“[T]he word ‘shall’ denotes a mandatory, not discretionary instruction.”) (citations omitted); *C.B. v. J.B.*, 65 A.3d 946, 952 (Pa. Super. 2013) (finding that “[t]he use of ‘shall’ means . . . must” and that to hold otherwise “would be to flout the legislative will”); *In re Canvass of Absentee Ballots of Nov. 4, 2003 Gen. Election*, 843 A.2d 1223, 1233 (Pa. 2004) (“[W]e are not compelled to pretend that ‘shall’ means ‘may’ under Section 3146.6(a).”); *Griesmer v. Hill*, 36 Pa. Super. 69 (Pa. Super. 1908) (“This provision is mandatory, and not directory merely. It means what it says. The word ‘shall’ means ‘shall’ [The defendant] not only may but ‘must.’”). Therefore, the AMI meter installation is mandatory, and a few legislators’ comments about the interpretation of the statute need not and should not be considered. See 1 Pa. C.S. § 1921(c). Additionally, even if the statute were ambiguous, the “administrative interpretations of such statute” should be considered and given substantial weight. *Id.* § 1921(c)(8). Importantly, the Commission, which is the entity charged with implementing and enforcing Section 2807(f) of the Public Utility Code, has issued several orders holding that there is no opt-out under the statute. (PPL MB at 11) Thus, there is no opt-out under Act 129, and PPL Electric must install the new AMI meters.

Second, Act 129 was not drafted as an opt-in bill. The Complainant mistakenly relies upon Section 2807(f)(2)(i) in support of her argument, which states that an EDC “shall furnish smart meter technology . . . [u]pon request from a customer that agrees to pay the cost of the smart meter at the time of the request.” (Complainant’s MB at 8) However, that statutory

provision merely enables a customer to request a smart meter if he or she wants one installed sooner than the meter would be installed pursuant to the EDC's deployment schedule. Indeed, as explained in PPL Electric's Main Brief, Section 2807(f)(2)(iii) mandates that the Company install the new AMI meter "[i]n accordance with a depreciation schedule not to exceed 15 years." (PPL MB at 10) As interpreted by the Commission, subparagraph (iii) requires the Company and other EDCs to install the new AMI meters for all their customers. (PPL MB at 10) Therefore, Act 129 is not an opt-in statute.

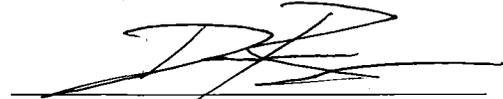
Third, the Complainant incorrectly asserts that PPL Electric has the burden of proof in this proceeding. Under Section 332(a) of the Public Utility Code, 66 Pa. C.S. § 332(a), "the proponent of a rule or order has the burden of proof." Further, in AMI meter-related matters, the Commission has held that "[t]he Complainant will have the burden of proof during the proceeding to demonstrate, by a preponderance of the evidence, that [the utility] is responsible or accountable for the problem described in the Complaint." *Kreider v. PECO Energy Co.*, Docket No. P-2015-2495064, p. 18 (Order entered Sept. 3, 2015); *see also Romeo v. Pa. PUC*, 154 A.3d 422, 429 (Pa. Cmwlth. 2017) (finding that the smart meter complainant should have a hearing to try to prove his claim through "the testimony of others as well as other evidence that goes to that issue"). Here, the Complainant has filed the Formal Complaint seeking an order to prevent the Company from installing the new AMI meter on her property. Therefore, under Section 332(a) of the Public Utility Code, the Complainant has the burden to prove the new AMI meter will cause adverse health effects as well as any other claims she has made about the new AMI meter.

Based on the foregoing, the Complainant's legal arguments should be rejected because they are flawed and based on irrelevant and inapplicable authorities.

IV. CONCLUSION

WHEREFORE, as explained above and in PPL Electric Utilities Corporation's Main Brief, the Company respectfully requests that Administrative Law Judge Elizabeth H. Barnes recommend and the Pennsylvania Public Utility Commission issue an Order dismissing the Formal Complaint of Evangeline Hoffman-Lorah with prejudice.

Respectfully submitted,



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