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OCT 22 2018

CONCHITA M BRAUN

1220 Parkside Drive South
Reading, PA 19611

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PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

conchitabraun@yahoo.com

October 22, 2018

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

**RE: Conchita M Braun vs. Metropolitan Edison Company
Docket No. C-2018-3003001**

Dear Secretary Chiavetta:

Enclosed please find my **Opposition to Metropolitan Edison Company's Motion to Compel.**

This document has been sent to Metropolitan Edison Company and to Administrative Law Judge Jeffrey Watson.

Please feel free to contact me if you have any questions in regards to this matter.

Sincerely,



Conchita M Braun
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Reading, PA 19611
(610) 375-3501
conchitabraun@yahoo.com

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

CONCHITA M BRAUN

:

v.

:

Docket No. C-2018-3003001

:

MET-ED COMPANY

:

OPPOSITION TO MOTION TO COMPEL

On October 19th I received the Motion to Compel from Metropolitan Edison Company, dated October 15th. I, Conchita M Braun oppose Respondents Motion to Compel for the following reasons:

1. When the Interrogatory and request for Documents was issued by Metropolitan Edison Company, letter dated September 13th, I was out of the country. By the time I returned from my trip, the deadline given to object and respond to the Interrogatories had expired. I returned from my trip on October 3rd, and as soon as I was able to, I wrote a letter to the company, with copies sent to PUC's Secretary Chiavetta and the assigned Honorable ALJ Watson, informing them that I wasn't in the country when the documents in question were issued or by the deadline requested. In the Motion to Compel by the Company,

there is no reference to the fact that I wasn't even here when the request was made or that I wasn't back by the due date they were requesting from me.

2. On the letter I sent the Company I also bring up the issue of finding the amount of time given, 20 days, to respond to such a vast amount of questions in the Interrogatory and document request as not sufficient and impossible for me to be able to meet. Having to answer so many questions and document requests, is something that shouldn't be done in a rush, but rather be done with the needed time to properly prepare, address, review and if possible find the information requested. Furthermore the company requests that the answer to each interrogatory should be started on a new page and the answers should restate the question asked, all this without providing a file to easily do so, but rather to have to retype every Interrogatory question from scratch therefore making it even more time consuming and an added expense. Between work, family and home obligations it would be impossible to have it done in 20 days, not even in several months. Even if a person wasn't employed, or had no other obligations, 20 days would not be enough time to turn in all the requested information.

Being forced to reply to such extensive request in the given time frame would cause an undue burden, expense, and unreasonable stress. Something that would go against Commission's regulations at 52 Pa Code 5.361 (2) (4)

5.361. Limitation of scope of discovery and deposition.

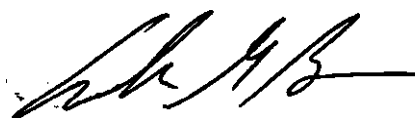
(2) Would cause unreasonable annoyance, embarrassment, oppression, burden or expense to the deponent, a person or party.

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

3. Some of the questions asked by the Company are irrelevant to the complaint. Rules regarding relevancy limits discovery to any non-privileged matter that is relevant to any party's claim or defense. If a party wants broader discovery then it must show good cause to support the request. Respondent has not shown any good cause in this case requesting things such as complete copy of cell phone bills received by all members of my household for the past 12 months, or information pertaining to possession of personal items like the name of the cell phone manufacturer, and phone models used ; or requesting detailed educational background, listing certificates, degrees, training and dates where the certificate, degrees or training was obtained and name and addresses of the institutions; or detailed employment history; or the request of my TV service provider. What do these questions have to do with my formal Complaint.? They are all irrelevant to my Complaint as it was submitted and infringe my privacy.

4. The last point I brought up in my letter is that the number of questions submitted exceed the number of Interrogatories allowed by Rule 33 of Civil Procedure, limiting it to 25 written interrogatories including all discrete subparts, instead of the 88 submitted by Met-Ed. If that is procedure in all civil actions and proceedings in the United States district courts, there must be a good reason for it. The request to answer 88 questions including lengthy documents and then not even provide the necessary time to do so, is unreasonable and impossible to meet.

My opposition grounds are on the amount of questions and documents requested, the short amount of time given to respond, the nature of some of the questions being private and irrelevant to the Complaint and the fact that no mention was made by the Company that I wasn't in the country when the Interrogatory letter arrived or by the due date requested. For the reasons stated, I oppose the Motion to Compel to answer the Interrogatories and Documentation request as they stand.



Conchita M Braun

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BEFORE THE

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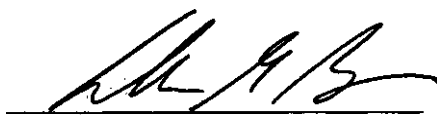
CERTIFICATE OF SERVICE

I hereby certify that I have this day, October 22, 2018, served a true copy of the Opposition to Motion to Compel to the following:

Lauren M. Lepkoski
Tori L Giesler
First Energy Service Company
2800 Pottsville Pike
P.O. BOX 16001
Reading, PA 19612-6001

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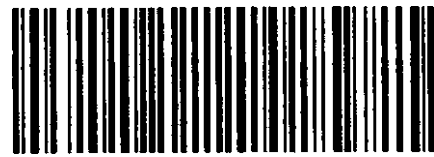
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Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor.
Harrisburg, PA 17120



Commonwealth of Pennsylvania
Office of Administrative Law Judge
Jeffrey A Watson
301 Fifth Ave., Suite 220, Platt Place
Pittsburgh, PA 15222



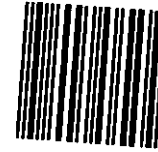
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