

Tori L. Giesler, Esq.
(610) 921-6658
(330) 315-9263 (Fax)

November 13, 2018

VIA ELECTRONIC FILING

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

Re: Heidi Fiedler v. Metropolitan Edison Company
Docket No. C-2018-3003642

Dear Secretary Chiavetta:

Enclosed please find the Motion to Compel of Metropolitan Edison 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,



Tori L. Giesler

krak
Enclosures

c: As Per Certificate of Service

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

HEIDI FIEDLER

V.

METROPOLITAN EDISON COMPANY

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Docket No. C-2018-3003642

NOTICE TO PLEAD

TO: Heidi Fiedler

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 Metropolitan Edison Company within **five (5) days** from the service of the Notice, the facts set forth by Metropolitan Edison 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 Metropolitan Edison 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 5th 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: November 13, 2018



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

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

HEIDI FIEDLER

V.

METROPOLITAN EDISON COMPANY

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Docket No. C-2018-3003642

**MOTION OF METROPOLITAN EDISON COMPANY TO COMPEL RESPONSES TO
INTERROGATORIES AND DOCUMENT REQUESTS**

TO THE PENNSYLVANIA PUBLIC UTILITY COMMISSION:

Metropolitan Edison Company (“Met-Ed” 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 Heidi Fiedler (“Complainant”) to provide full and complete responses to interrogatories and document requests issued by the Company on October 25, 2018. In support thereof, the Company avers as follows:

I. BACKGROUND

1. On July 23, 2018, the Complainant filed a Formal Complaint with the Pennsylvania Public Utility Commission (“Commission”) regarding 432 East Wesner Road, Blandon, Pennsylvania 19510 (“Service Location”).

2. On August 13, 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 September 11, 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 September 21, 2018, ALJ Watson issued an Interim Order, which denied the Company's Preliminary Objections.

5. On October 25, 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 November 5, 2018, Complainant submitted a filing amending her original complaint and objecting to all of the Company's Discovery Requests. The Complainant objected to providing any discovery responses at this time on the grounds that "[i]t is not possible to provide detailed information and comprehensive answers to the questions, and to provide documents be used in this case, without knowing the precise manufacturer and model of the smart meter system . . . that MetEd and FirstEnergy seek to install at my home." The amendments to the original complaint that were contemporaneously filed with Complainant's objections generally requested information regarding the Company's smart meters, sought to add FirstEnergy Corp. as a respondent in this proceeding, and made additional requests for relief. A copy of the Complainant's November 5, 2018 filing is attached as Exhibit A.

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

8. 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

9. Complainant objects generally to all of the Company's Discovery Requests, arguing that she needs additional information from the Company regarding the planned installation of a smart meter at her property before being able to provide any responses. This objection is

without merit. To begin, Complainant has not served the Company with any discovery requests seeking the requested information. And, even if she had, it would not excuse her failure to answer the Company's other Discovery Requests that have nothing to do with the requested information. Moreover, as explained in the Company's Discovery Requests to Complainant, if Complainant lacks information that she believes is necessary to respond to a specific request, the proper response would be to respond to the Company that she lacks the information necessary to respond to the request and explain the efforts made by her to obtain the information – not to merely object to providing any information whatsoever. Complainant can then supplement her responses to the specific questions she claims to lack the necessary information to respond to now when she has obtained such information. As explained below, the Discovery Requests are relevant and within the scope of permissible discovery. Accordingly, Met-Ed is entitled to have Complainant respond to these requests based on her knowledge currently and to have Complainant supplement her responses should she learn additional information that causes any of her responses to change in the future.

10. 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.

11. 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.

12. 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.

13. 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 her Formal Complaint providing the basis for her denial of a smart meter. More specifically, the Company's Discovery Requests inquire into Complainant's allegations that the installation of a smart meter would have a negative impact on her health and that she is “very sensitive to

electromagnetic radiation and EMF.” The Discovery Requests also seek additional information regarding Complainant’s allegation that the Company is in violation of Act 129 of 2008 and other information related to the general and specific allegations in the Formal Complaint. The Company is entitled to the requested information to enable it to fully investigate what information the Complainant relied on to make the allegations in her Formal Complaint.

14. 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.

15. 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.

16. The Company requests that the Complainant 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.

17. In the event the Complainant is directed by the Commission, but fails to respond to the Company’s Discovery Requests, the Company respectfully requests that the Complaint against the Company be dismissed in its entirety.

WHEREFORE, Metropolitan Edison 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 Heidi Fiedler.

Respectfully submitted,



Dated: November 13, 2018

Lauren M. Lepkoski
Attorney No. 94800
Tori L. Giesler
Attorney No. 207742
FirstEnergy Service Company
2800 Pottsville Pike
P.O. Box 16001
Reading, Pennsylvania 19612-6001
(610) 921-6203
(610) 921-6658
llepkoski@firstenergycorp.com
tgiesler@firstenergycorp.com

Counsel for Metropolitan Edison Company

November 5, 2018

ROSEMARY CHIAVETTA
SECRETARY
PENNSYLVANIA PUBLIC UTILITY COMMISSION
400 NORTH STREET 2ND FLOOR
HARRISBURG, PA 17120

Heidi Fiedler v. Metropolitan Edison Company
Docket No. C-2018-3003642

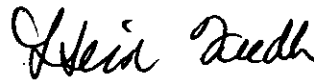
Dear Ms. Chiavetta:

Please find enclosed my Amended Formal Complaint and my Objections to Interrogatories and Production of Documents. I have acquired new critical information that was not in the original complaint and am requesting additional relief from the Respondent.

I am also serving copies to the Honorable Lauren Lepkoski of First Energy Services Company.

Thank you for your attention to this matter.

Very truly yours,



Heidi Fiedler

RECEIVED

NOV - 5 2018

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

Enclosures

cc: The Honorable Jeffrey Watson, Public Utility Commission
The Honorable Lauren Lepkoski, First Energy Services Company

BEFORE THE PENNSYLVANIA PUBLIC UTILITIES COMMISSION

Heidi Fiedler

v.

Docket No. C-2018-3003642

Metropolitan Edison Company

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FIRST AMENDED COMPLAINT

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

In addition to my original Complaint, I submit the following information to amend my Formal Complaint No. C-2018-3003642 filed with the Public Utility Commission. It is my belief that it is critical for Metropolitan Edison Company (Met Ed) to provide comprehensive information about the entire smart meter system that is being deployed in the Met Ed service area. There appears to be many makes and models of smart meters in existence, with each manufacturer having unique operating systems. 66 PA CS Section 1501, Character of services and facilities, states "Every public utility shall furnish and maintain adequate, efficient, safe and reasonable service and facilities." In order to research Met Ed's compliance with section 1501, one must have all of the precise smart meter-related information on Met Ed's smart meter systems. In order to proceed with my case, Met Ed should provide the smart meter system information that is referenced in my Complaint.

Further, it is my understanding that First Energy Corporation (First Energy), a registered public utility holding company headquartered in Akron, Ohio, is responsible for the smart meter deployment in Pennsylvania through its offices in Reading, PA. As the holding company, First Energy appears to make all of the financial and operating decisions for its wholly owned subsidiary company, Met Ed. It further appears that First Energy is responsible for Met Ed's compliance with 66 PA CS Section 1501, Character of services and facilities. Further, Met Ed is represented by Lauren Lepkoski, an attorney working for First Energy Service Company. First Energy Corporation should be included as a Respondent in this case.

Additional Requested Relief

6. Compel Met Ed/First Energy to provide comprehensive smart meter system information on Met Ed's current smart meter deployment in Pennsylvania, including all manufacturer information, model number, independent testing laboratory reports on all safety information, including the EMF and EMR emitted by the smart meters, controllers and all related equipment. Also compel Met Ed to include detailed information on how the smart system operates, including how it sends and receives information on the smart meter grid and how it communicates with ALL other electronic devices, either within or outside customers' homes.
7. Compel Met Ed to furnish all national safety and environmental certifications of its smart meter system equipment
8. Order First Energy Corporation as an additional Respondent in my Complaint.

BEFORE THE PENNSYLVANIA PUBLIC UTILITIES COMMISSION

Heidi Fiedler

vi.

Docket No. C-2018-3003642

Metropolitan Edison Company

OBJECTIONS TO INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS

With the filing of the Amended Complaint, I submit a blanket objection to the completion of the entire Met Ed Interrogatories and Request for production of documents dated October 25, 2018. It is not possible to provide detailed and comprehensive answers to the questions, and provide documents to be used in this case, without knowing the precise manufacturer and model of the smart meter system, (and all of the other the information that I seek in the Amended Complaint,) that Met Ed and First Energy seek to install at my home.

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NOV 5 2018

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Heidi Fiedler

v.

Metropolitan Edison Company

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C-2018-3003642

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true and correct copy of an amended Formal Complaint and Objections to Interrogatories and Production of Documents for Docket No. C-2018-3003642 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:

Honorable Lauren Lepkoski

First Energy Services Company
2800 Pottsville Pike
PO Box 16001
Reading, PA 19612

Dated: November 5, 2018

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NOV - 5 2018

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU


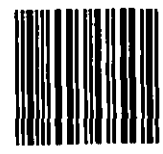


Heidi Fiedler
432 E. Wesner Rd
Blandon, PA 19510

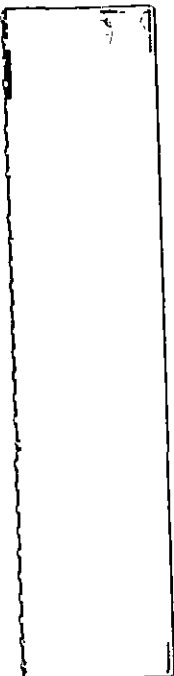
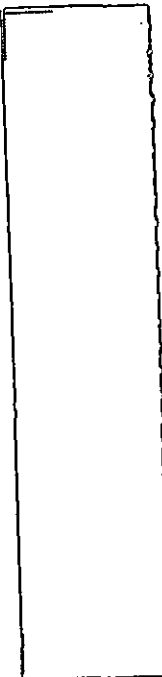
 Ms Heidi Fiedler
Blandon PA
432 E Wesner Rd
Blandon PA 19510

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EXHIBIT A
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MS. ROSEMARY CHIAVETTA
PUBLIC UTILITY COMM.
400 NORTH ST.
HARRISBURG, PA 17120





2800 Pottsville Pike
PO Box 16001
Reading, PA 19612-6001

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

October 25, 2018

VIA FIRST CLASS MAIL


Heidi Fiedler
432 East Wesner Road
Blandon, PA 19510

Re: Heidi Fiedler v. Metropolitan Edison Company
Docket No. C-2018-3003642

Dear Ms. Fiedler:

Enclosed please find the Interrogatories and Requests for Production of Documents (Set I) to Metropolitan Edison Company. Pursuant to 52 Pa. Code §§ 5.341 and 5.349, *et seq.*, your answers are due within twenty days of service of this letter (November 14, 2018). In addition, any objections are due within ten days of service of this letter (November 4, 2018). This document has been served as indicated within the Certificate of Service.

Very truly yours,


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**

HEIDI FIEDLER	:	
	:	
v.	:	Docket No. C-2018-3003642
	:	
METROPOLITAN EDISON COMPANY	:	
	:	

**INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS OF
METROPOLITAN EDISON COMPANY TO HEIDI FIEDLER, SET I**

Metropolitan Edison Company hereby propounds these Interrogatories and Requests for Production of Documents (Set I) to Heidi Fiedler (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 (November 14, 2018) and objections within 10 days (November 4, 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: October 25, 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 Heidi Fiedler and her attorneys, agents, or representatives.

F. As used herein, the terms “Company” or “Respondent” refer to Metropolitan Edison 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-2018-3003642.

H. As used herein, the terms “service location,” “property,” or “home” refer to your service address of 432 East Wesner Road, Blandon, Pennsylvania 19510.

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 METROPOLITAN EDISON COMPANY TO HEIDI
FIEDLER, 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.

- 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.
 - d. Do you have any relevant educational or work background that qualifies you to assert this position?
 - e. If yes, please identify the relevant educational or work background that qualifies you to assert 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. In your complaint, you state that you believe the Company is in violation of Act 129. Please provide the following information related to this statement?
 - a. Is it your position that a customer has the right to request a smart meter not be installed at her service location?
 - b. Is it your position that a customer must request smart meter installation?
 - c. Is it your position that Act 129 of 2008 does not require the utility to install smart meters throughout its service territory?
14. Is it your position that you would like to opt out completely from smart meter installation?

15. Do you believe the installation of a smart meter at your property would violate the privacy or security of a member of your household?
16. If yes to question 15, please specifically describe each of your concerns regarding your household's privacy or security after the installation of a smart meter.
17. Please provide the following information regarding your position that the installation of a smart meter would violate your household's privacy or security:
 - 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.
 - d. Do you have any relevant educational or work background that qualifies you to assert this position?
 - e. If yes, please identify the relevant educational or work background that qualifies you to assert this position.
18. To your knowledge, has a smart meter been installed by the Company at your property?
19. Please describe in detail how you believe a smart meter operates.

20. In your complaint, you state that you are “aware of serious security and hacking issues with smart meters.” 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.
21. Please list the specific issues you intend to raise at the hearing in this proceeding.
22. Please identify the legal support, including specific citations, for each issue identified in question 21.
23. Please list the factual support for each issue identified in question 21.
24. 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.
25. Would any witness identified in question 24 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.
26. 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.
27. Please describe in detail your employment history.
- a. Please provide your employer name and address.
 - b. Please provide the title of your position.
 - c. Please provide the dates of your employment.
 - d. Please provide the duties performed in your position.

**REQUESTS FOR PRODUCTION OF DOCUMENTS OF METROPOLITAN EDISON
COMPANY TO HEIDI FIEDLER, SET I**

28. 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.
29. 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 2, 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.
30. 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.
31. Please provide copies of all documentation supporting your position that smart meters would create safety issues for you or members of your household.
32. 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.
33. 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.

34. Please provide copies of all documentation supporting your position that smart meters would violate the privacy or security of your household.
35. Please provide copies of all documentation you intend to refer to at the hearing in this proceeding supporting your position that smart meters would violate the privacy or security of your household.
36. Please provide copies of all documentation supporting your position that your household may opt out of smart meter installation.
37. Please provide copies of all documentation you intend to refer to at the hearing in this proceeding supporting your position that a household may opt out of smart meter installation.
38. Please provide a copy of all proposed exhibits you intend to submit for the hearing in this proceeding.
39. Please provide copies of all documentation you are relying upon in support of your positions in this proceeding.
40. 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**

HEIDI FIEDLER

v.

METROPOLITAN EDISON COMPANY

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Docket No. C-2018-3003642

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 Metropolitan Edison Company to Heidi Fiedler 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:

Heidi Fiedler
432 East Wesner Road
Blandon, PA 19510

Dated: October 25, 2018



Lauren M. Lepkoski
FirstEnergy Service Company
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Reading, Pennsylvania 19612-6001
(610) 921-6203
llepkoski@firstenergycorp.com

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

HEIDI FIEDLER

V.

METROPOLITAN EDISON COMPANY

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Docket No. C-2018-3003642

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the Motion to Compel of Metropolitan Edison 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:

Heidi Fiedler
432 East Wesner Road
Blandon, PA 19510

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

Dated: November 13, 2018



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