

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

November 26, 2018

VIA ELECTRONIC FILING

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

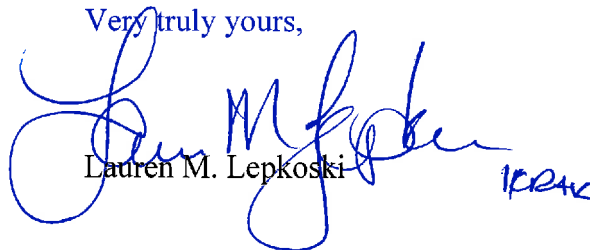
Re: Janet E. Cole v. Metropolitan Edison Company
Docket No. C-2018-3003023

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,


Lauren M. Lepkoski

krak
Enclosures

c: As Per Certificate of Service

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

JANET E. COLE

V.

METROPOLITAN EDISON COMPANY

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:
:
:
:

Docket No. C-2018-3003023

NOTICE TO PLEAD

TO: Janet E. Cole

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:

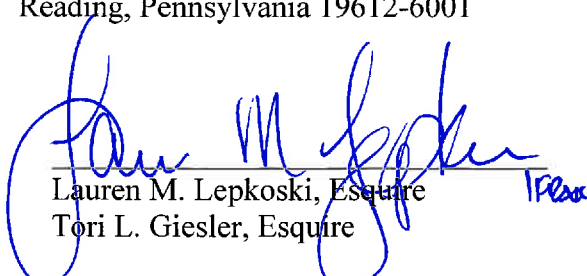
Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
PO Box 3265
Harrisburg, PA 17105-3265

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 26, 2018


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

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

| | | |
|------------------------------------|---|----------------------------------|
| JANET E. COLE | : | |
| | : | |
| V. | : | Docket No. C-2018-3003023 |
| | : | |
| METROPOLITAN EDISON COMPANY | : | |

**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 Janet E. Cole (“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 18, 2018, the Complainant filed a Formal Complaint with the Pennsylvania Public Utility Commission (“Commission”) regarding 630 Euclid Avenue, Temple, Pennsylvania 19560 (“Service Location”) which was served on the Company on June 27, 2018.

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 July 30, 2018, the Complainant filed a petition for extension of time to file a reply to the Preliminary Objections and Answer and New Matter.

4. On August 9, 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. That same day, ALJ Watson issued an Interim Order which granted the Complainant’s request for an extension.

5. On August 28, 2018, the Complainant filed a response to the Answer and New Matter.

6. On October 10, 2018, ALJ Watson issued an Interim Order which denied the Company’s Preliminary Objections. That same day, ALJ Watson issued an Interim Order which established a litigation schedule.

7. On November 5, 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.

8. On November 15, 2018, the Company received a letter from Complainant 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 and stating that many of the questions were irrelevant, duplicative of the “questions asked” in the Interim Order which established the litigation schedule, intrusive and an “invasion of privacy.” Further, the Complainant states that she questions “the legality of this entire process.”

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

10. A full copy of the Complainant's Objections to the Company's Discovery Requests is attached as Exhibit B.

11. At no point did the Complainant 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

12. 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 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. 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.

13. 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.

14. 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.

15. 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.

16. 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 and previous correspondence Complainant has sent to the Company providing the basis for her 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 she did in her Formal Complaint.

17. 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.

18. 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.

19. 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.

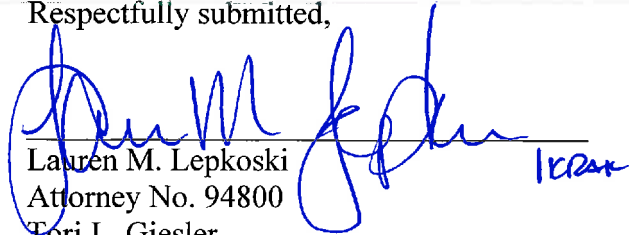
20. In the event the Complainant is directed by the Commission, but fail to respond to the Company's Discovery Requests, the Company respectfully requests that the Complaint against the Company be dismissed in its entirety.

WHEREFORE, 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 Janet E. Cole.

Dated: November 26, 2018

Respectfully submitted,



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

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tgiesler@firstenergycorp.com

Counsel for Metropolitan Edison Company



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

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

November 5, 2018

VIA FIRST CLASS MAIL

Janet E. Cole
630 Euclid Avenue
Temple, PA 19560

Re: Janet E. Cole v. Metropolitan Edison Company
Docket No. C-2018-3003023

Dear Ms. Cole:

Enclosed please find the Interrogatories and Requests for Production of Documents (Set I) to Janet E. Cole. 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 26, 2018). In addition, any objections are due within ten days of service of this letter (November 15, 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 "L M 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**

JANET E. COLE :
 :
 v. : **Docket No. C-2018-3003023**
 :
METROPOLITAN EDISON COMPANY :
 :

**INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS OF
METROPOLITAN EDISON COMPANY TO JANET E. COLE, SET I**

Metropolitan Edison Company hereby propounds these Interrogatories and Requests for Production of Documents (Set I) to Janet E. Cole (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 26, 2018) and objections within 10 days (November 15, 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: November 5, 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 Janet E. Cole 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-2018-3003023.

H. As used herein, the terms “service location,” “property,” or “home” refer to your service address of 630 Euclid Avenue, Temple, Pennsylvania 19560.

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 JANET E.
COLE, 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. Is it your position that you would like to opt out completely from smart meter installation?
14. Do you believe the installation of a smart meter at your property would violate the privacy or security of a member of your household?
15. If yes to question 14, please specifically describe each of your concerns regarding your household's privacy or security after the installation of a smart meter.
16. 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. Is yes, please identify the relevant educational or work background that qualifies you to assert this position.
17. To your knowledge, has a smart meter been installed by the Company at your property?
18. Please describe in detail how you believe a smart meter operates.
19. In your complaint, you state that a smart meter would “individually identify devices inside [your] home and record when they are in use.” 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.

20. In your complaint, you state that: “It is possible, for example, with analysis of certain ‘Smart Meter’ data for unauthorized and distant parties to determine medical conditions . . .” 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. In your complaint, you state that: “It is possible for example, with analysis of certain ‘Smart Meter’ data for unauthorized and distant parties to determine . . . sexual activities, and physical locations of persons within the home . . .” 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.
22. In your complaint, you state that: “It is possible for example, with analysis of certain ‘Smart Meter’ data for unauthorized and distant parties to determine . . . vacancy patterns . . .” 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.

- 23. In your complaint, you state that: “It is possible for example, with analysis of certain ‘Smart Meter’ data for unauthorized and distant parties to determine . . . personal information and habits of the occupants.” 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.

- 24. In your complaint, you state that: “Electromagnetic and Radio Frequency energy contamination from smart meters exceed allowable safe and healthful limits for domestic environments as determined by the EPA and other scientific programs.” 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.

25. In your complaint, you state that: “Smart Meters have been known to frequently ‘blow up’ or start fire causing thousands of dollars of damage per household, at times destroying the entire property.” 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.
26. In your complaint, you state that smart meters “transmit wireless signals which may be intercepted by unauthorized and unknown parties.” 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.
27. Please list the specific issues you intend to raise at the hearing in this proceeding.
28. Please identify the legal support, including specific citations, for each issue identified in question 27.
29. Please list the factual support for each issue identified in question 27.

30. 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.
31. Would any witness identified in question 30 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.
32. 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.
33. 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 JANET E. COLE, SET I**

34. 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.
35. 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.
36. 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.
37. Please provide copies of all documentation supporting your position that smart meters would create safety issues for you or members of your household.
38. 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.
39. 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.

40. Please provide copies of all documentation supporting your position that smart meters would violate the privacy or security of your household.
41. 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.
42. Please provide a copy of all proposed exhibits you intend to submit for the hearing in this proceeding.
43. Please provide copies of all documentation you are relying upon in support of your positions in this proceeding.
44. Please provide copies of all documentation that you referenced, referred to, or otherwise relied upon in preparing your responses to these discovery requests.

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

JANET E. COLE :
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 v. : **Docket No. C-2018-3003023**
 :
METROPOLITAN EDISON COMPANY :
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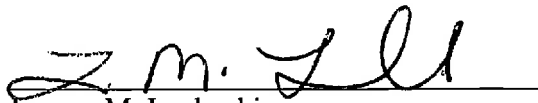
CERTIFICATE OF SERVICE

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 Janet E. Cole 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:

Janet E. Cole
630 Euclid Avenue
Temple, PA 19560

Dated: November 5, 2018


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

**JANET E. COLE
630 EUCLID AVENUE
TEMPLE, PA 19560**

FIRST CLASS MAIL

November 12, 2018

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

Re: Janet E. Cole vs. Metropolitan Edison Company
Docket No. C-2018-3003023

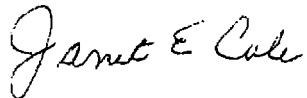
Dear Secretary Chiavetta:

I have enclosed my Opposition to Interrogatories and Request for Production of Documents of Metropolitan Edison Company to Janet E. Cole, Set 1 and Requests for Production of Documents of Metropolitan Edison Company to Janet E. Cole, Set1

A copy of this document will be forwarded to Metropolitan Edison Company and to Administrative Law Judge Jeffrey Watson.

If you have any questions, please feel free to contact me.

Sincerely,



Janet E. Cole
630 Euclid Avenue
Temple, PA 19560
(610) 929.4374
janeco@ptd.net

**RECEIVED
NOV 15 2018
LEGAL DEPT.**

November 12, 2018

Docket # C-2018-3003023

Dear Secretary Lepkoski:

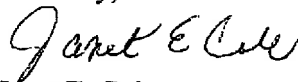
I am writing regarding the Interrogatories and Request for Production of Documents (Set 1) to Janet E. Cole which was dated November 5, 2018 and received by me November 9, 2018.

The due date for my answers is within twenty days of service of this letter (November 26, 2018). In addition, any objections are due within ten days of this letter (November 15, 2018).

Please be advised that I am objecting to the interrogatories for a number of reasons;

- a. It would be impossible to gather said information in that amount of time even for an attorney. As an unrepresented individual, it would take months to complete this form considering the massive amount of questions and sub-questions. Twenty (days) to respond is absolutely and utterly unreasonable.
- b. Many of the questions are thoroughly irrelevant.
- c. Many questions are duplications of the question asked in the Interim Order Establishing Initial Litigation Schedule and Interim Order Denying Preliminary Objections that I received from the PUC that are due on or before January 10, 2018.
- d. The questions relating to medical records, medications, dates of doctor visits, etc. for members of my household and myself are unnecessarily intrusive and irrelevant.
- e. Asking for the location in my home of various electronic devices is an invasion of privacy, which is one of my objections to said Controlling devices. Privacy has been one of my main concerns from the beginning and was explained in my original complaint.
- f. I question the legality of this entire process.

Sincerely,



Janet E. Cole
630 Euclid Avenue
Temple, PA 19560

cc: Lauren Lepkoski, Esquire
Honorable Jeffrey A. Watson

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

JANET E. COLE

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:
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V.

Docket No. C-2018-3003023

METROPOLITAN EDISON COMPANY

CERTIFICATE OF SERVICE

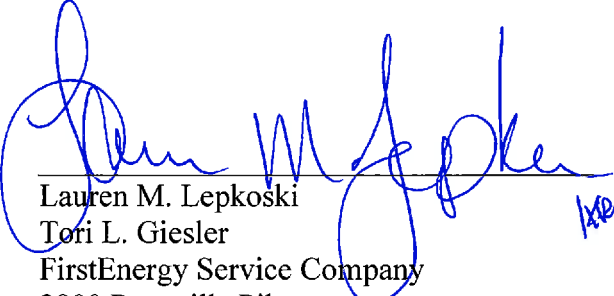
I hereby certify that I have this day served a true copy of the Motion to Compel of Metropolitan Edison Company upon the individual listed below, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

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

Janet E. Cole
630 Euclid Avenue
Temple, PA 19560

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

Dated: November 26, 2018



Lauren M. Lepkoski
Tori L. Giesler

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