

Christopher and Jo-Anna Tellefsen  
3324 River Road  
Mount Bethel, PA 18343

November 16, 2018

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

**RE: Christopher and Jo-Anna Tellefsen v. Metropolitan Edison Company**  
**Docket No. C-2018-3005250**

Dear Secretary Chiavetta:

Enclosed please find the response of Christopher and Jo-Anna Tellefsen to the Preliminary Objections of Metropolitan Edison Company in the above-referenced matter. This document has been served on the Defendants as shown in the Certificate of Service.

Please contact me if you have any questions.

Sincerely,  
*Christopher Tellefsen*  
*Jo-Anna Tellefsen*  
Christopher Tellefsen  
Jo-Anna Tellefsen

Enclosures

c: As per Certificate of Service

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**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**CHRISTOPHER AND JO-ANNA  
TELLEFSEN**

v.

**METROPOLITAN EDISON COMPANY**

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**Docket No. C-2018-3005250**

**ANSWER TO THE PRELIMINARY OBJECTION OF METROPOLITAN EDISON COMPANY**

TO THE PENNSYLVANIA PUBLIC UTILITY COMMISSION:

AND NOW, Christopher and Jo-Anna Tellefsen, files this answer to the Preliminary Objection of Metropolitan Edison Company, as follows:

**I. Introduction**

1. Admitted.
2. Admitted.
3. Admitted.

4. Denied. Act 129, and all preceding smart meter legislation, do not state that smart meters are mandatory. Federal legislation regarding energy efficiency and smart meter program deployment does not state that the installations must be mandatory without consent from consumer.

5. Denied. The Commission has an opportunity in this case to clarify that they respect the rights of American citizens to choose the commercial products placed on their private property especially since the effects of this product has not been fully studied extensively for an adequate time period by the medical establishment. We request that the Commission (1) allows an exemption to the installation of a smart meter; (2) allow opt-out options.

**II. Background**

6. Admitted.
7. Admitted.

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8. Admitted.

9. Admitted.

**III. Argument**

10. Admitted.

11. Admitted.

12. Admitted.

13. Denied. Act 129, and all preceding smart meter legislation, do not state that smart meters are mandatory. The June 5 Order also does not state that installation of smart meters is mandatory. The Commission's interpretation of PA 129 and the June 5 Order neglects to address the rights of the consumer to request a smart meter as per Federal mandate as well as neglects to provide opt-out options.

14. Admitted.

15. Admitted and Denied. Act 129, and all preceding smart meter legislation, do not state that installation of smart meters is mandatory.

16. Denied. There is no legislation written that states that "the Commission's precedent is uniform that it cannot grant exceptions to the statutory directive that smart meters be installed by allowing customers to opt out". It is understood that this the unwritten order given to utility companies and is thus, the argument used in cases against citizens. However, mandatory smart meters were never the intention of the Federal mandate, they were never written into law and permission was never given to the Commission by the Federal Power Act to make smart grid standards mandatory.

17. Admitted.

18. Admitted and Denied. Act 129, and all preceding smart meter legislation, do not state that installation of smart meters is mandatory and that there should be no opt-out options. Met-Ed is not in violation. The Commission's interpretation of the Federal mandate is in violation.

19. Denied. The Commission can grant relief in this case and all the other current cases asking for opt-out options.

20. Admitted.

21. Admitted and Denied. There is no evidence stating that long term exposure of smart meters is safe for humans. FCC studies cannot legally hold medical and biological precedence. Smart meter manufacturer studies can be considered biased and also cannot legally make medical and biological claims. We are not claiming a medical exemption as in the cases of *Susan Kreider v. PECO Energy Company*, Docket No. C-2015-2469655, and *Stephen and Diane Van Schoyck v. PECO Energy Company*, Docket No. C-2015-2478239. We are claiming our Civil Right as American Citizens to choose as per Energy Policy Act of 2005, Title XII, Subtitle E, Section 1252, (a), (14), (c).

22. Admitted.

23. Admitted.

24. Denied. Act 129, and all preceding smart meter legislation, do not state smart meters are mandatory, so therefore it is not legal for the Commission to force utilities companies to give clients an ultimatum, coercing them to either allow installation or suffer termination of energy.

25. Admitted and Denied. It is understood that the utility company has the right to access meters. Access has always been allowed on our property, and there is no account of a utilities worker being denied access.

26. Admitted.

#### IV. Conclusion

Denied. We request that the Commission (1) allows an exemption to the installation of a smart meter, (2) follows the original intent of the Federal mandate by allowing clients to request a time-based meter and, (3) provide opt-out options.

Dated: November 16, 2018

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Sincerely,

*Christopher Tellefsen*

*Jo-Anna Tellefsen*

Christopher Tellefsen  
Jo-Anna Tellefsen  
3324 River Road  
Mount Bethel, Pa 18343  
(570)897-0235

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**CHRISTOPHER AND JO-ANNA** :  
**TELLEFSEN** :  
 :  
 : **Docket No. C-2018-3005250**  
 v. :  
 :  
**METROPOLITAN EDISON COMPANY** :

**CERTIFICATE OF SERVICE**

I hereby certify that I have this day served a true copy of Christopher and Jo-Anna Tellefsen's Response to the Preliminary Objections of Metropolitan Edison Company upon the individuals listed below.

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

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

Dated: November 16, 2018

*Christopher Tellefsen*  
*Jo-Anna Tellefsen*  
\_\_\_\_\_  
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**FROM:**

Christopher and JoAnna Tellefsen  
3324 River Road  
Mount Bethel, PA 18343

**TO:**

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