

3835 Acorn Street
Pittsburgh, PA 15207

November 30, 2018

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

Re: Miranda Grace Edwards v. Duquesne Light Company
Docket No. C-2018-3002741

Dear Secretary Chiavetta:

Attached please find the Complainant's (my) responses to Duquesne Light Company's First Set of Discovery Requests. It has been submitted in accordance with the specified deadline of November 30, 2018.

A copy of this document has been served upon the Respondent's Counsel, Shane Miller, Esq., in accordance with Commission regulations.

Please feel free to contact me if you have any questions.

Sincerely,



M. Grace Edwards
Complainant
msea.mdew@gmail.com

Attachment

Cc: Shane Miller, Esquire, and Jeremy V Farrell, Esquire, Counsel for Duquesne Light Company (via email) (with attachment)

3835 Acorn Street
Pittsburgh, PA 15207

November 30, 2018

Shane Miller, Esquire
1500 One PPG Place
Pittsburgh, PA 15222

Re: Miranda Grace Edwards v. Duquesne Light Company
Docket No. C-2018-3002741

Dear Mr. Miller:

Attached please find the Complainant's (my) responses to your First Set of Discovery Requests. It has been submitted in accordance with the specified deadline of November 30, 2018.

A copy of this document has been filed with the Pennsylvania Public Utilities Commission.

Please feel free to contact me if you have any questions.

Sincerely,



M. Grace Edwards
Complainant
msea.mdew@gmail.com

Attachment

Cc: Jeremy V Farrell, Esquire, Counsel for Duquesne Light Company (via email) (with attachment)

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

MIRANDA GRACE EDWARDS,

Complainant,

vs.

DUQUESNE LIGHT COMPANY,

Respondent.

No. C-2018-3002741

Responses to Respondent's

FIRST SET OF DISCOVERY REQUESTS

Filed by Miranda Grace Edwards

msea.mdew@gmail.com
3835 Acorn Street
Pittsburgh, PA 15207

COMPLAINANT'S RESPONSES TO RESPONDENT'S FIRST SET OF DISCOVERY REQUESTS

TO: RESPONDENT'S GENERAL COUNSEL, SHANE MILLER, ESQUIRE; AND JEREMY V FARRELL, ESQUIRE

THESE PAGES CONSTITUTE THE FILING OF MY WRITTEN RESPONSE TO THE FIRST SET OF DISCOVERY REQUESTS SERVED ON ME BY RESPONDENT DUQUESNE LIGHT COMPANY. THESE HAVE BEEN SUBMITTED TO YOU PER THE SPECIFIED DEADLINE OF NOVEMBER 30, 2018.



Miranda Grace Edwards

November 30, 2018

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

MIRANDA GRACE EDWARDS,

Complainant,

vs.

DUQUESNE LIGHT COMPANY,

Respondent.

No. C-2018-3002741

RESPONSES TO RESPONDENT'S FIRST SET OF DISCOVERY REQUESTS

AND NOW comes Complainant Miranda Grace Edwards ("I") and hereby files this, my Responses to Respondent's First Set of Discovery Requests.

General objections: I object to each and all of the Respondent's Discovery Requests insofar as this First Set of Discovery Requests was filed before I had a chance to respond to the Respondent's Preliminary Objections or Answer and New Matter. Some of the information the Respondent requests is contained in my responses to their Preliminary Objections and Answer and New Matter. Other information requested is no longer relevant now that the Judge has ruled. Still, I will address these points again herein as they are raised.

1. State all facts that support Your claim that Duquesne Light's installation of a Smart Meter at the Property will negatively affect Your health.

ANSWER:

This is premature; I am in the process of gathering information and facts that support my claim. Duquesne Light Company's (DLC's) answers to my interrogatories will help inform additional facts that support my claim. The following list includes a few of the reasons I believe the installation of a smart meter on my home will negatively affect my health.

- Smart meters—and the smart grids these are part of—have been demonstrated in a multitude of independent reputable analyses to be a credible threat of harm. EDCs, including DLC, often claim it has been proven that there are no health effects from smart meters. These claims have been refuted by many experts—including the World Health Organization, which classified radiofrequency electromagnetic fields as possibly carcinogenic to humans (Group 2B) (<http://www.who.int/en/news-room/fact-sheets/detail/electromagnetic-fields-and-public-health-mobile-phones>). Lead and DDT are also classified as Group 2B. In May 2011, the World Health Organization (WHO), the International Agency for Research on Cancer, classified radiofrequency

EMF sent and received by smart meters as a class 2B carcinogen, meaning it is possibly carcinogenic to humans.

- Lloyd's of London has an exclusion clause specifically for electromagnetic fields (<http://andrewgeller.me/doc/Lloyds-Insurance-Policy-EMF-Exclusion-150207.pdf>), page 7, subsection 32 under "General Insurance Exclusions." If there is absolutely no risk, no such exclusion would be necessary.

2. Produce all Documents, including but not limited to hospital and/or medical records or studies, that relate to Your answer to Discovery Request No. 1.

ANSWER:

This is premature to the extent that, as stated in Discovery Request No. 1, I am in the process of gathering information and facts that support my claim.

In addition, requesting that I produce "all" Documents that would support my claim is overly burdensome to the point of impossibility. A staggering number of studies have been conducted on the health effects of EMF, many of which are publicly available and can be accessed by DLC without my intervention.

Furthermore, any request to produce any of my personal medical information—or that of anyone who spends time in my home—is unnecessarily intrusive. Neither I nor my close friends and family members should be forced to suffer health effects from spending time at my home.

3. State all facts that support Your claim that Duquesne Light's installation of a Smart Meter at the Property will infringe upon Your privacy and/or violate Your rights under the Fourth Amendment to the United States Constitution.

ANSWER:

Request No. 3 is irrelevant to the extent that it specifies the Fourth Amendment to the United States Constitution, now that the Judge has ruled that the Pennsylvania Public Utilities Commission (PA PUC) cannot adjudicate claims related to the United States Constitution. However, the fact remains that DLC's installation of a smart meter on my Property would infringe upon my privacy—and this violation is no less grievous without specific reference to the Fourth Amendment of the United States Constitution. The following list includes a few of the reasons I believe the forced installation of a smart meter on my home would violate my privacy.

- Smart meters monitor household activity and occupancy. They individually identify electrical devices inside the home and record when they are operated.
- Smart meters transmit wireless signals that may be intercepted by unauthorized and unknown parties.

- Data about occupants' daily habits and activities is collected, recorded, and stored in permanent databases that can be accessed by parties not authorized or invited to know and share that private data by those whose activities were recorded.
- DLC and the PA PUC have not adequately disclosed the particular recording and transmission capabilities of the SK9MIA7 OpenWay (which, according to my most recent understanding, is the smart meter DLC wishes to install at my Property), or the extent of the data that will be recorded, stored, and shared—or the purposes for which the data will and will not be used.

4. Produce all Documents that relate to Your answer to Discovery Request No. 3.

ANSWER:

This is premature; as stated in Discovery Request No. 1, I am in the process of gathering information and facts that support my claim.

In addition, requesting that I produce “all” Documents that would support my claim is overly burdensome to the point of impossibility.

5. State all facts that support Your claim that Duquesne Light's installation of a Smart Meter at the Property poses a potential fire hazard.

ANSWER:

This is premature; as stated in Discovery Request No. 1, I am in the process of gathering information and facts that support my claim. Duquesne Light Company's (DLC's) answers to my interrogatories will help inform additional facts that support my claim. The following list includes a few of the reasons I believe the installation of a smart meter on my home poses a fire hazard, increasing the risk of damage to my Property and jeopardizing my physical safety.

- Thousands of fires involving burned and/or exploded smart meters have been documented in PA, CA, TX, FL, NV, IL, MI, and across Canada. These fires have caused property damage and fatalities.
- In our own state of Pennsylvania, for example, installation of Sensus smart meters was halted in 2012 after a spate of “overheating”-related house fires.

6. Produce all Documents that relate to Your answer to Discovery Request No. 5.

ANSWER:

This is premature; as stated in Discovery Request No. 1, I am in the process of gathering information and facts that support my claim.

In addition, requesting that I produce “all” Documents that would support my claim is

overly burdensome to the point of impossibility. Abundant evidence that smart meters have caused house fires exists, including court records and news stories that are publicly available and can be accessed by DLC without my intervention.

7. To the extent not previously requested or produced, produce all Documents that You intend to offer into evidence at any hearing in this matter.

ANSWER:

See answer to Discovery Request No. 4.

8. State the full name, address, and telephone number of each person who You expect to call to testify at any hearing of this matter.

ANSWER:

This is premature; as stated in Discovery Request No. 1, I am in the process of gathering information and facts that support my claim. I am also in the process of contacting people who might be able to testify at any hearing of this matter.

9. State the full name, address, and telephone number of each person who You expect to call to testify as an expert witness at any hearing of this matter and, for each expert witness, state:
 - a. The subject matter on which the expert is expected to testify;
 - b. The substance of the facts and opinions to which the expert is expected to testify;
and
 - c. A summary of the grounds for each expert opinion.

ANSWER:

See answer to Discovery Request No. 8.

10. Produce the report of any expert You intend to call to testify on Your behalf at trial.

ANSWER:

See answer to Discovery Request No. 8.

11. Produce the curriculum vitae of any expert that You intend to call to testify on Your behalf at trial.

ANSWER:

See answer to Discovery Request No. 8.

12. Provide Your age and educational background, including but not limited to all colleges or universities that You attended and all degrees and/or certifications You have received.

ANSWER:

This is an irrelevant and unnecessarily personal/intrusive request. My complaint would not be more or less valid based on my age and educational background. I am not claiming to have any education or expertise that relates directly to this matter.

13. Produce a copy of Your current resume and/or curriculum vitae.

ANSWER:

See answer to Discovery Request No. 12.

14. Have You ever performed work or been employed in the scientific or medical fields?

ANSWER:

No, I have not performed work or been employed in the scientific or medical fields in a capacity that would confer expertise directly related to this matter. This is irrelevant to my formal complaint; I am not offering myself as an expert in either of these fields.

15. If the answer to the preceding request was in the affirmative, state:

- The name of each employer that You performed work for in the scientific or medical fields;
- Describe, in as much detail as possible, the specific duties that You performed for each employer; and
- State the dates on which You performed these duties.

ANSWER:

Not applicable.

16. Identify the type (with make and model) of all devices, appliances, and equipment used in Your home or by You in Your daily life that produce radio frequency or low frequency fields, including, but not limited to, cell phones, microwave ovens, wireless internet, and Wi-Fi routers.

ANSWER:

Discovery Request No. 16 is irrelevant because of crucial differences between any “devices, appliances, and equipment used by [me] in [my] home or in [my] daily life” and the Itron SK9AMI7 HW 3.1 OpenWay CENTRON Singlephase Smart Meter.

Furthermore, providing information on these products of which I have ownership and control would open the door to even more intrusive lines of inquiry, such as Discovery Request No. 17.

17. For each cell phone identified in response to the preceding request, produce the last six months of bills or other usage records for the phone with sufficient detail to show Your actual usage for that period.

ANSWER:

Discovery Request No. 17 is irrelevant because of crucial differences between products owned and controlled by the user (such as cell phones) and smart meters noted in my response to Discovery Request No. 16.

It is also intrusive, asking me to provide exactly the type of detailed information I do not want DLC and unknown parties collecting and storing about my daily activities.

18. Produce all documents, including, but not limited to, user manuals and instructional materials, relating to each device identified in response to Discovery Request No. 16.

ANSWER:

See answer to Discovery Request No. 16.

19. Do You claim that there has been a fire(s) caused by an Itron SK9AMI7 HW 3.1 OpenWay CENTRON Singlephase Smart Meter installed by Duquesne Light or its contractors? If so, for each such fire, state:

- The date of the fire;
- The address of the location where the fire happened; and
- All facts that support Your contention or belief that the fire was caused by an Itron SK9AMI7 OpenWay CENTRON Singlephase Smart Meter installed by Duquesne Light or its contractors.

ANSWER:

This is premature; I am in the process of gathering information and facts that support my claim, including the information specified in Discovery Request No. 19. Duquesne

Light Company's (DLC's) answers to my interrogatories will help inform additional facts that support my claim.

20. Produce all Documents that relate to Your response to the preceding request.

ANSWER:

See answer to Discovery Request No. 19.

21. Do You claim there has been a privacy, data, or security breach to Duquesne Light's customers caused by an Itron SK9AMI7 HW 3.1 OpenWay CENTRON Singlephase Smart Meter? If so, for each such breach, state:

- The date of each breach;
- The nature of information breached; and
- All facts that support Your contention or belief that the breach was caused by an Itron SK9AMI7 HW 3.1 OpenWay CENTRON Singlephase Smart Meter.

ANSWER:

Duquesne Light is in possession of all this material, which will be requested by me in interrogatories.

22. Produce all Documents that relate to Your response to the preceding request.

ANSWER:

See answer to Discovery Request No. 21.

23. Outside of the Documents and pleadings already produced in connection with Your Formal Complaint, produce any Document(s) that You have prepared in whole or in part that relates to the subject of radio frequency or Your Formal Complaint.

ANSWER:

This is premature; I am in the process of gathering information and facts that support my claim, including any materials that relate to the subject of radio frequency. Duquesne Light Company's (DLC's) answers to my interrogatories will help inform additional facts that support my claim.

24. Have You ever performed any job responsibilities or engaged in a course of study specifically relating to radio frequency or low frequency radiation? If so, describe each job responsibility and/or course of study in detail.

ANSWER:

No, I have never performed any job responsibilities or engaged in a course of study specifically relating to radio frequency or low-frequency radiation. This is irrelevant to my formal complaint; I am not offering myself as an expert in radio frequency or low-frequency radiation.

25. Produce all Documents that relate to Your response to the preceding request.

ANSWER:

Not applicable; see answer to Discovery Request No. 24.

26. Are You a certified electrician? If so, state the date of certification.

ANSWER:

No, I am not a certified electrician.

27. Identify all medical conditions that make You vulnerable to, or that would be aggravated by, proximity to an Itron SK9AMI7 HW 3.1 OpenWay CENTRON Singlephase Smart Meter.

ANSWER:

See answer to Discovery Request No. 2.

28. Produce all Documents, including but not limited to hospital and/or medical records and studies, demonstrating that You suffer from the medical condition(s) identified in Your response to Discovery Request No. 27.

ANSWER:

See answer to Discovery Request No. 2.

29. Produce all Documents, including but not limited to hospital and/or medical records and studies, demonstrating the relationship between the medical condition(s) identified in Your response to Discovery Request No. 27 and Your proximity to an Itron SK9AMI7 HW 3.1 OpenWay CENTRON Singlephase Smart Meter.

ANSWER:

See answer to Discovery Request No. 2.

Respectfully submitted,

A handwritten signature in blue ink, consisting of stylized, cursive letters that appear to be 'MGE'.

Miranda Grace Edwards

November 30, 2018

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

MIRANDA GRACE EDWARDS,

Complainant,

vs.

DUQUESNE LIGHT COMPANY,

Respondent.

No. C-2018-3002741

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the foregoing document upon the participant listed below in accordance with the requirements of 52 PA. Code § 1.54 (relating to service by a participant):

Shane Miller, Esquire
Jeremy V Farrell, Esquire
1500 One PPG Place
Pittsburgh, PA 15222
Fax: 412-594-5619

Counsel for Respondent, Duquesne Light Company

Dated this 30th day of November, 2018



Miranda Grace Edwards
msea.mdew@gmail.com
3835 Acorn Street
Pittsburgh, PA 15207