

December 14, 2018

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

**Re: Lydia and Alan Rieger v. Metropolitan Edison Company**  
**Docket No. C-2018-3005887**  
**Docket No. C-2018-3005877**  
**Docket No. C-2018-3005889**

Dear Secretary Chiavetta:

Attached please find our response to the New Matter of Metropolitan Edison Company in the above-referenced matter.

We are responding to Docket No. C-2018-3005887, our residence at 211 Ben Franklin Hwy. W., Birdsboro, PA 19508.

No. 3005877, at 553 Rock Hollow Rd., Birdsboro, PA 19508 will have a new owner on December 28, 2018 and therefore we will not pursue our complaint for that property, however, we would like it to go on record that we were not informed, by written notice or otherwise, that a smart meter was being installed on the property. Only the tenant whose name was on the electric bill was informed. Tenants come and go but owners remain longer and should also be informed.

No. 3005889, at 202 Cinder St., Birdsboro, PA 19508, does not have a Smart Meter yet, and nor do we want one. Tenants live there and at least one of them to our knowledge has health problems. We feel that they would do best without a Smart Meter on the home. We would like to pursue the complaint for this home, however, it is unclear to us how it benefits us to consolidate the complaints as they are 2 separate houses with 2 slightly different circumstances. We are requesting more information regarding Metropolitan's request to consolidate the complaints.

Please contact us if you have any questions.

Sincerely,

Lydia R. Rieger



**BEFORE THE  
PENNSYLVANIA UTILITY COMMISSION**

**LYDIA AND ALAN RIEGER**

v.

**Docket No. C-2018-3005887**

**METROPOLITAN EDISON COMPANY**

**REPLY TO THE NEW MATTER OF METROPOLOITAN EDISON COMPANY TO OUR  
FORMAL COMPLAINT**

TO THE PENNSYLVANIA PUBLIC UTILITY COMMISSION:

We, Lydia and Alan Rieger (“Complainants”) are responding to Metropolitan Edison Company’s New Matter as follows:

**RESPONSE TO NEW MATTER**

12. Admitted in part and denied in part. I, Lydia Rieger, contacted and discussed with Met-Ed that we wanted to opt out of having a Smart Meter installed due to health, safety, and privacy reasons.

13. Agreed in part and denied in part. Yes, there is an Act 129 of 2008 (“Act129”).

Denied in part that nowhere in Act 129 does it require deployment of a meter which is harmful to consumers’ health or to consumers with medical conditions.

14. Admitted in part and denied in part. Complainants challenge the provision of Met-Ed’s service that includes the installation of a smart meter which will provide unsafe emissions that are harmful to people, especially to those with disabilities. Moreover, the deployment of a RF emitting Smart Meter is not required by Act 129, especially if it is damaging to one’s health.

15. Denied. We were aware that Smart Meters existed in general, but were not informed about the SPM until after the written notice that Met-Ed wanted to install Smart Meters on our houses.

We would have certainly complained early had we known about the SPM and the risks of Smart

Meters. Moreover, the lack of previous complaints does not affect our rights to make a complaint any time we see fit to do so.

16. Denied. Met-Ed is violating 66 Pa.C.S. § 1501 upon which the Commission can grant relief. To subject people to an unsafe RM emitting device is unconscionable. For Met-Ed to subject its customers to a device that harms its customers is just incomprehensible. The Commission can certainly allow us to opt-out of a Smart Meter, like other states have done.

17. Denied. Met-Ed's installation of an RF emitting, transient- and harmonic-producing Smart Meter on our home would be detrimental to our family's health and anyone else's health who enters our home, which would be in violation of 66 Pa.C.S. § 1501. In addition, Met Ed's forced deployment of an RF emitting, transient- and harmonic-producing Smart Meter would be harmful especially to the health of one of our family members. We have a family member living in our home who is disabled and has numerous health issues that would be adversely affected by a smart meter's emissions. In addition, I, Lydia Rieger, operate a business in the home that includes tutoring young children, and teaching numerous community classes to all ages, pre-school children to senior citizens. Having a smart meter in place of our analog meter in the front of the home where people enter and then remain for 1-3 hours at a time, would be harmful to their health, especially if they are electro-hypersensitive. I have no way of knowing which students are sensitive, and once we would find out that they are having health issues because of a Smart Meter where they take their classes, they would most certainly not want to continue coming for classes where their health is being compromised, which would be unfortunate for their continued learning and growth, not to mention it would be bad for my business.

Furthermore, Act 129 does not mandate that Met-Ed install RF emitting Smart Meters to medically vulnerable persons. In fact, Act 129 does not mandate RF emitting Smart Meters

whatsoever. The Commission has the jurisdiction to hear allegations of violations of 66 Pa.C.S. § 1501. In addition, we are very concerned regarding the safety of our home, due to reports of many house fires after installation of the Smart Meters, including explosions, fire damage and death due to fire. We are very concerned, also, that if a smart meter is installed in our home, a house which is over 250 years old, that the installation process as well as the operation of the Smart Meter would interfere with our wiring and our appliances' normal operation. We will hold Met Ed directly responsible should there ever be any damages that it caused by their Smart Meter if one is installed in our home. It is our understanding that there are constant RF emissions with the Smart Meters and no way to turn them off or to adjust them. Moreover, we are requesting that Met-Ed state the amount of radiation and dirty electricity emitted from a Smart Meter at a hearing. The public Utility Code and the Commission's regulations require that regulated utilities like Met Ed furnish and maintain adequate, efficient, safe, and reasonable service and facilities 66 Pa. C.S. Section 1501; 52 Pa Code Section 57.194.

18. Denied. Act 129 does not mandate that Met-Ed install RF emitting Smart Meters to medically vulnerable persons. In fact, Act 129 does not mandate RF emitting Smart Meters whatsoever.

19. Denied. Complainants are asking to opt-out of the installation of a Smart Meter based upon their disabled family member and the members of the community who come for classes, among other health and safety reasons, to not have an RF emitting, and transient- and harmonic-producing device installed on the property in violation of Met-Ed's responsibilities under 66 Pa.C.S. § 1501. Therefore, the Complainants' Complaint must not be dismissed. As a matter of law, Met-Ed must furnish electricity which is safe for the Complainants, and Met-Ed is not permitted to install a Smart Meter on the Complainants' residence which would be harmful to

any of their residents' health. Met-Ed has also told us that if we do not accept the Smart Meter that they will turn off our electricity. This is not only absurd, it is abusive. Our disabled family member needs a stair lift which is run by electricity to enter and leave the home as well as to use her bedroom and bathroom. Turning off our electricity because we would refuse an unneeded and harmful Smart Meter would be cruel and abusive to our well-being, especially to our disabled family member.

WHEREFORE, we, Lydia and Alan Rieger, hereby respectfully request that the Commission deny Met-Ed's New Matter and 1) grant Complainants' request for opting-out of the installation of an RF emitting, transient- and harmonic-producing Smart Meter; 2) allow the Formal Complaint to proceed in its entirety as clarified here and in our response to the Preliminary Objections; and, 3) grant such other relief as may be just and reasonable under the circumstances. In this case, we believe that a fair and impartial hearing should be granted.

Respectfully submitted,

Dated: December 14, 2018

Lydia and Alan Rieger  
211 Ben Franklin Hwy. W.  
Birdsboro, PA 19508  
610-639-1439  
610-639-4355  
doggonegoodstaging@gmail.com  
askalan4homes@gmail.com