

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

November 30, 2018

janeco@ptd.net

(home) 610.929.4374

Rosemary Chiavetta, Secretary
Pennsylvania Public Utilities 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

**OPPOSITION TO METROPOLITAN EDISON COMPANY'S MOTION TO
COMPEL**

Dear Secretary Chiavetta:

I have enclosed my OPPOSITION TO METROPLITAN EDISON COMPANY'S
MOTION TO COMPEL.

A copy of this Opposition has been sent to Metropolitan Edison Company and to
Administrative Law Judge Jeffrey Watson.

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

Sincerely,

Janet E. Cole

12/1/18

Janet E. Cole
630 Euclid Avenue
Temple, PA 19560
(610) 929.4374

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DEC 13 2018

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

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2018 DEC -5 AM 9:11
PA PUC
SECRETARY'S BUREAU

BEFORE THE
PUBLIC UTILITY COMMISSION

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SECRETARY'S BUREAU

JANET E. COLE

V.

MET-ED COMPANY

Docket No. C-2018-3003023

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DEC 13 2018

OPPOSITION TO MOTION TO COMPEL PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

Last evening, November 29th I received a Motion to Compel from Metropolitan Edison Company which was dated November 26, 2018. Due to not receiving the Motion until relatively late in the evening, I didn't get a chance to read it until today November 30th. I was given **five (5) days** to respond by denying or correcting the enclosed Motion to Compel of Metropolitan Edison Company. Metropolitan stated 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."

- a. That timing gives me exactly one (1) day to prepare a response, mail it to the various entities and assure that the mail delivers it within twenty-four (24) hours. I am now writing to inform Metropolitan Edison Company, the PUC's Secretary Chiavetta and the Honorable ALJ Watson that what Metropolitan Edison Company is requesting is impossible.
- b. I have already stated that twenty (20) days to respond to all of the questions and sub-questions is not enough time to address the issues in a proper and appropriate manner. It would take me months to research all the answers that you are requesting me to answer. I have a home, family and other obligations to attend to and no one could possibly comply with Metropolitan Edison Companies' demands.

- c. Attempting to force me to submit to said demands is causing a huge burden, anxiety, expense and unreasonable stress and there is no doubt in my mind that it is done intentionally.
- d. This complaint was filed by me, Janet E. Cole, and not by my family, therefore requesting information on members of my family is definitely infringing on this family's privacy.
- e. My employment history, health history, education history etc. is in no way relevant to my objection to having a "controller" installed on my property.

I oppose this Motion to Compel on the grounds that it is too burdensome to gather all the information requested in any amount of time short of six (6) to ten (10) months. I also oppose this Motion because it is far and above being intrusive and expecting me to give up all sectors of the privacy of my family and myself. I am a strong advocate of the Fourth Amendment which gives me the right to be secure in my person, house, papers and effects. I feel that Metropolitan Edison Company is trying desperately to take that right away from me, not only with your questions but also with your "controllers". For these reasons, I oppose the Motion to Compel to answer the Interrogatories and Documentation request as they now stand.

Janet E Cole

12/10/16

Janet E. Cole

BEFORE THE

PENNSYLVANIA PUBLIC UTILITY COMMISSION

JANET E. COLE

V.

MET-ED COMPANY

Docket No. C-2018-3003023

CERTIFICATE OF SERVICE

I hereby certify that on this day, November 30, 2018, I have served a true and correct copy of the Opposition to Compel to the following:

FIRST CLASS MAIL

Lauren M Lepkoski
Tori L. Giesler
First Energy Service Company
2800 Pottsville Pike
P.O. Box 16001
Reading, PA 19601

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

Commonwealth of Pennsylvania
Office of Administrative Law Judge
Jeffrey A. Watson
301 Fifth Ave., Suite 220, Platt Place
Pittsburg, PA 15222

Janet E Cole

Janet E. Cole ^{12/10/18}
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DEC 13 2018

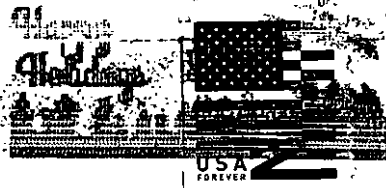
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Janet E. Cole
630 Euclid Avenue
Temple, PA 19560

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Rosemary Chiavetta, Secretary
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Harrisburg, PA 17120

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