

Exhibit F

Tab F

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

| | | |
|------------------------|---|----------------|
| Michele Hriadil and | : | |
| Francis Hriadil | : | |
| | : | |
| v. | : | C-2016-2571726 |
| | : | |
| Duquesne Light Company | : | |

**INTERIM ORDER
GRANTING COMPLAINANTS' REQUEST FOR AN ADDITIONAL EXTENSION OF
TIME TO FILE RESPONSE TO RESPONDENT'S MOTION FOR SUMMARY
JUDGMENT AND CONTINUING THE EVIDENTIARY HEARING SCHEDULED FOR
JULY 18-19, 2018**

Michele Hriadil and Francis Hriadil (Complainants) filed a Formal Complaint (Complaint) with the Pennsylvania Public Utility Commission (Commission) against Duquesne Light Company (Respondent or Company) on October 3, 2016, alleging, *inter alia*, the existence of reliability, safety or quality problems with their electric service and objecting to the installation of a smart meter in their home. Complainants essentially aver that smart meters are unsafe, present privacy concerns, are vulnerable to cyber threats, are inferior in quality to analog meters and present serious health concerns. Complainants further aver that there is a correlation to radio frequency (RF) exposure to neurological, cardiac, and pulmonary disease, as well as reproductive and developmental disorders, immune dysfunction, cancer and other health conditions. Complainants aver that the young and elderly populations, are particularly susceptible to these harmful effects and that Complainants are elderly and suffer from chronic conditions. Complainants aver that the smart meters are not certified by underwriters laboratories, there is a potential for the meters to explode, are the meters are not always installed by certified electricians and that fires have been caused by the quality of meter construction and the lack of evaluations and inspections. Complainants also object to the cost of implementing

and installing the meters. As relief, Complainants request that the Commission order Respondent to forego installation of a smart meter at their residence.

On November 4, 2016, Respondent filed an Answer and New Matter to the Complaint, essentially denying the material allegations set forth in the Complaint. Respondent avers that Complainants have refused to permit technicians to install a smart meter in their home. Respondent further avers it is required by Act 129 of 2008,¹ to install the AMI meter.

On November 4, 2016, Respondent also filed preliminary objections to the Complaint.

A Motion Judge Assignment Notice was issued on May 16, 2017 and assigned the undersigned presiding officer to this proceeding.

Respondent's preliminary objections were denied by interim order entered on August 16, 2017.

On June 4, 2018, Respondent filed a motion for summary judgment. On June 7, 2018, Complainants provided the undersigned presiding officer with a letter requesting an extension of time until June 30, 2018, to file a response to the motion for summary judgment. On June 8, 2018, Complainants advised the office of the undersigned presiding officer that Respondent had no objection to the request for an extension.

The hearing in this matter has been scheduled for July 18-19, 2018.

Under the circumstances, the following order will be entered.

¹ 66 Pa.C.S. Sections 2806.1, *et seq.*

THEREFORE,

IT IS ORDERED:

1. That Complainants' request for an additional extension of time until July 6, 2018 in order to file a response to Respondent's motion for summary judgment is granted.

2. That the evidentiary hearing scheduled for July 18-19, 2018 is hereby continued in order to properly review the motion for summary judgment and any response from Complainants.

Date: June 29, 2018

Jeffrey A. Watson
Administrative Law Judge

C-2016-2571726 - MICHELE HRIADIL & FRANCIS HRIADIL v. DUQUESNE LIGHT
COMPANY

MICHELE HRIADIL
FRANCIS HRIADIL
331 SHADY RIDGE DRIVE
MONROEVILLE PA 15146-7510
412.779.3314

JEREMY V FARRELL ESQUIRE
PAUL SHANE MILLER ESQUIRE
LAUREN N RULLI ESQUIRE
TUCKER ARENSBERG PC
1500 ONE PPG PLACE
PITTSBURGH PA 15222
412.594.3938
412.594.5503
412.594.5510
-E-SERVE-

Exhibit G

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**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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| Michele Hriadil and | : | |
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| Duquesne Light Company | : | |

INTERIM ORDER

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On June 4, 2018, Respondent filed a motion for summary judgment. On June 7, 2018, Complainants provided the undersigned presiding officer with a letter requesting an extension of time until June 30, 2018, to file a response to the motion for summary judgment. On June 8, 2018, Complainants advised the office of the undersigned presiding officer that Respondent had no objection to the request for an extension.

The motion for summary judgment was denied by interim order entered on November 30, 2018.

Under the circumstances, it is appropriate to schedule an evidentiary hearing in this proceeding. For planning purposes, the Parties are advised that it is anticipated that the hearings will be scheduled in March or April of 2019 and will be held on two consecutive days. The Parties will need to contact all of their respective witnesses and identify all dates in which the witnesses will be available to provide testimony in this proceeding. Absent an order to the

¹ 66 Pa.C.S. Sections 2806.1, *et seq.*

contrary, it is anticipated that the hearings will be scheduled as in-person hearings in Pittsburgh, Pennsylvania, and the witnesses shall testify in person at the hearings. Given the nature of this dispute and the expectation that the Parties will need to coordinate the availability of fact and expert witnesses, the following order will be entered.

THEREFORE,

IT IS ORDERED:

1. That the Parties are hereby directed to contact their respective proposed fact and expert witnesses and identify their availability to present testimony at the hearings in this case in March or April of 2019.

2. That the Parties shall obtain the information required above, not later than December 17, 2018 and the Parties shall then confer not later than December 23, 2018 and exchange the respective dates in which all of their witnesses will be available, and agree upon two consecutive dates for the scheduling of the evidentiary hearings.

3. That on or before January 11, 2019, the Parties shall provide the undersigned presiding officer with a written status report indicating the agreed upon dates for the hearings in this proceeding.

Date: December 3, 2018

Jeffrey A. Watson
Administrative Law Judge

C-2016-2571726 - MICHELE HRIADIL & FRANCIS HRIADIL v. DUQUESNE LIGHT
COMPANY

MICHELE HRIADIL
FRANCIS HRIADIL
331 SHADY RIDGE DRIVE
MONROEVILLE PA 15146-7510
412.779.3314

JEREMY V FARRELL ESQUIRE
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LAUREN N RULLI ESQUIRE
TUCKER ARENSBERG PC
1500 ONE PPG PLACE
PITTSBURGH PA 15222
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Exhibit H

Tab H

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

MICHELE HRIADIL and
FRANCIS HRIADIL,

Complainant,

vs.

DUQUESNE LIGHT COMPANY,

Respondent.

No: C-2016-2571726

**RESPONSE TO RESPONDENT'S
SECOND SET OF DISCOVERY
REQUESTS DIRECTED TO
COMPLAINANTS**

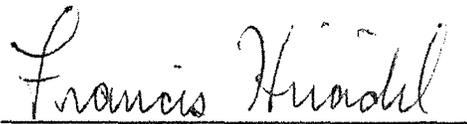
Filed by Michele and Francis Hriadil

hriadil@attglobal.net
(412) 779-3314
331 Shady Ridge Drive
Monroeville, PA 15146

**RESPONSE TO RESPONDENT'S
SECOND SET OF DISCOVERY REQUESTS DIRECTED TO COMPLAINANTS**

**THIS IS COMPLAINANTS RESPONSE TO RESPONDENT'S SECOND SET OF DISCOVERY
REQUESTS.**

**A CERTIFICATE OF SERVICE HAS BEEN FILED WITH THE COMMISSION'S SECRETARY, PER
JUDGE WATSON'S OCTOBER 3, 2017 INTERIM ORDER.**



Francis Hriadil
January 12, 2018

16. 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:

- a. The date of each breach;
- b. The nature of information breached; and
- c. 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:

Complainants have no observability into the inner workings or incidents at the Respondent. Complainants claim that Respondent's security integrity is no better than the best security systems being implemented by government, business, and industry, that have already encountered serious breaches, many of which have been widely-reported in the press and trade industry publications. And as such, Respondent cannot guarantee Complainants privacy and security. Many experts have warned of the vulnerabilities.

What worsens the situation is that the Respondent's Smart Meter and Mesh Network, by its very structure has hundreds of thousands of potentially hackable entry points. The Smart Meter itself, including the Respondent's SK9AMI7 OpenWay Smart Meter, has been highlighted as one of the weakest links in the Smart Network, and there are hundreds of thousands of them that have been deployed by the Respondent.

Complainants have served Set #1 of Discovery Requests to Respondent to disclose any such incidents and/or occurrences.

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

ANSWER:

Documents were provided in Complainants Discovery Response #1 (served October 26, 2017) and Response #2 (served December 4, 2017) to Respondent's First Set of Discovery requests. Those documents, as well as all documents that have already been served on the