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January 30, 2019

**VIA ELECTRONIC FILING**

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

**Re: Larry R. Kramer and Ellen M. Kramer v. Metropolitan Edison Company**  
**Docket No. C-2017-2630621**

Dear Secretary Chiavetta:

Attached please find the Objections of Metropolitan Edison Company to the Motion to Compel of Larry R. Kramer and Ellen M. Kramer to Metropolitan Edison, in the above-referenced matter. This document has been served as shown in the Certificate of Service.

Please contact me if you have any questions.

Very truly yours,

*Tori L. Giesler (KBW)*

Tori L. Giesler

Enclosures

cc: As Per Certificate of Service

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**LARRY R. KRAMER AND  
ELLEN M. KRAMER**

v.

**METROPOLITAN EDISON COMPANY**

:  
:  
: **Docket No. C-2017-2630621**  
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:  
:

**ANSWER OF METROPOLITAN EDISON COMPANY TO MOTION TO COMPEL OF  
LARRY R. KRAMER AND ELLEN M. KRAMER**

TO THE PENNSYLVANIA PUBLIC UTILITY COMMISSION:

Pursuant to 52 Pa. Code § 5.342(g), Metropolitan Edison Company (“Met-Ed” or the “Company”) files this Answer in response to the Motion to Compel of Larry R. Kramer and Ellen M. Kramer (“Complainants”) dated January 22, 2019 (“Discovery Requests”). The Company avers as follows:

**I. Background**

1. On October 24, 2017, the Complainants filed a Formal Complaint with the Pennsylvania Public Utility Commission (“Commission”) regarding 101 South College Street, Myerstown, Pennsylvania 17067 (the “Service Location”).
2. On November 13, 2017, the Company filed its Answer and New Matter denying the material allegations as well as Preliminary Objections.
3. On November 30, 2017, the Complainants filed a reply to the Company’s Answer and New Matter.
4. On November 30, 2017, the Complainants also filed an Amended Formal Complaint which was served on the Company via first class mail.
5. On December 6, 2017, a motion judge assignment notice was issued assigning this matter to Administrative Law Judge Jeffrey A. Watson (“ALJ Watson”) for disposition.

6. On December 26, 2017, an Interim Order was issued by ALJ Watson denying the Company's Preliminary Objections.
7. On January 10, 2018, the Complainants filed a reply to the Company's Answer and New Matter to the Complainants' Amended Formal Complaint.
8. On January 23, 2018 in accordance with 52 Pa. Code § 5.341, the Company forwarded to the Complainants interrogatories and document requests via first class mail.
9. On February 3, 2018, the Complainants mailed objections to all of the Company's interrogatories and document requests.
10. On June 14, 2018, the Company filed a Motion to Compel responses to the Company's discovery requests issued on January 23, 2018.
11. On August 30, 2018, ALJ Watson issued an Interim Order granting the Company's Motion to Compel and ordering the Complainants to provide full, complete objections and/or responses to the Company's Discovery Requests on or before September 14, 2018.
12. In a letter dated September 13, 2018, Complainants responded to the Interim Order and essentially restated their prior objections, which were already rejected in the ALJ's Interim Order granting the Company's Motion to Compel. To date, the Company has yet to receive any responses to the discovery requests it propounded upon complainants on January 23, 2018.
13. Given the Complainants' failure to respond to the Company's discovery requests and ALJ Watson's order compelling the same, the Company filed a Motion to Dismiss the Formal Complaint in this matter on October 30, 2018, which remains pending at this time.
14. On December 17, 2018, the Company received Complainants' Interrogatories and Requests for Production.

15. On December 26, 2018, the Company filed its objections to certain of the Discovery Requests. In particular, the Company objected to interrogatory numbers 19, 20, 27-32, 34-37, 55-58, 60 and 61. A copy of the Company's objections is attached hereto as Exhibit A.

16. On January 22, the Complainants filed their Motion to Compel related to these objections.

## **II. Answer**

17. The Complainants' motion is premised in large part on their dissatisfaction with the procedural process thus far in this proceeding, and seemingly with the Company's counsel's handle on the practice of law as it relates in particular to their Discovery Requests and the Company's corresponding objections. Ironically, while the Complainants seem to have read enough of the regulations to attempt to call foul on the Company's pleadings, they do not appear to have read those which govern their own duties, or which outline method for computation of time as established by regulation.

18. The Complainants' Motion to Compel should at its outset be denied as untimely. The Commission's regulations at 52 Pa. Code § 5.342(g) require the filing of any motion to compel responses following the service of objections by any party within ten days. Here, the Company served its objections on December 26, 2018, making any motion to compel responses due by January 8, 2019, giving the Complainants the benefit of the "mailbox rule" outlined in the Commission's regulations at 52 Pa. Code § 1.56(b).<sup>1</sup>

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<sup>1</sup> Counting ten days from the date of the Company's objections would set the deadline for a motion to compel as January 5, 2019. However, using the rules for computation of time set out in the Commission's regulations at Section 1.56, because the Company's objections were served via first class mail, that date is extended to January 8, 2019.

19. Where a motion to compel is not filed by the prescribed date (here, January 8, 2019), the objected to discovery responses are deemed to have been withdrawn. 52 Pa. Code § 5.342(g). As such, the Company considers the objected to responses to be withdrawn at this point.

20. Even if latitude is given to the Complainants despite the provisions of Section 5.342(g), their motion argues that the Company's objections are untimely. This is incorrect. The Complainants are correct that their Discovery Requests were dated December 11, 2018, which typically starts a ten-day clock for objections, ordinarily making objections due on December 21, 2018. However, here, the postal stamp indicated that those interrogatories did not actually get served, as defined under Section 1.56(a) of the Commission's regulations, until December 12, 2018. Further, they were served via first class mail. Giving the Company the same benefit of the "mailbox rule"<sup>2</sup> afforded to all other parties, the additional three days added to the typical December 22 objection deadline would cause any objections to be due on December 25, 2018 – a federal holiday. Because of the holiday and consistent with the Commission's regulations at Section 1.12(a), this caused the Company's deadline to be set for December 26, 2018 – the date they did in fact serve their objections and file proof of such service with the Commission's Secretary's Bureau. The Complainants' gratuitous comments about the ease "professional attorneys" should have in objecting to their questions and how "easy enough" it is based on their assumptions about the Company's office staff should be disregarded – the Company is permitted the same benefit of the timelines prescribed by Commission regulation as any other party to this proceeding.

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<sup>2</sup> 52 Pa. Code § 1.56(b).

21. The Company articulated in its objections the very specific reasons why it was objecting to the requests that it did. Those objections are attached as Exhibit A to this Answer and are incorporated herein by reference.

22. Many of the requests seek information related to the experience of other customers seeking exclusion from the installation of a smart meter. The Company is required to keep information related to other customers confidential. Similarly, information regarding other customers may not be presented at any evidentiary hearing in this matter, making such requests unlikely to lead to discoverable evidence, even in the event they do not seek confidential customer information. Given that fact, the information sought through these discovery requests are not reasonably calculated to lead to admissible evidence for purposes of this proceeding.

23. In the other instances objected to, the Company does not have any discernable means of quantifying the information sought. For instance, the Company does not independently track the number of calls that come in related to refusal of smart meters across its footprint. In order to determine the number of calls, the Company would have to individually review the account records of over one half a million customers over its entire installation period in order to determine such a number. It should go without saying that this would be an unduly burdensome task, and one that does not change the facts of the specific case before us.

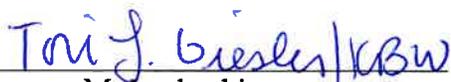
24. Similarly, there are a multitude of questions seeking the Company's position on "Section 1501 customers" and obligations under Section 1501 of the Pennsylvania Public Utility Code. Apart from this being a category of customers the Company does not understand the meaning of, the panoply of topics that fall under Section 1501 make this line of discovery requests overly broad and burdensome, as it expands the Complainants' discovery to topics well beyond smart meter installation into each and every aspect of what it means to provide

reasonable utility service in Pennsylvania – most topics under which are not at issue in this proceeding. Given that fact, the information sought through these discovery requests are not reasonably calculated to lead to admissible evidence for purposes of this proceeding.

25. Finally, quite a number of the requests are related to the costs of smart meter implementation in the Company's territory and associated financial issues. All such matters were already addressed in the Company's smart meter implementation plan proceedings, and are addressed on an annual basis as part of their rate changes for their Smart Meter Technologies Charge Rider. It is improper to address those issues here, as they are already settled or should be taken up in another docket dedicated to that purpose. Given that fact, the information sought through these discovery requests are not reasonably calculated to lead to admissible evidence for purposes of this proceeding.

WHEREFORE, for all of the foregoing reasons, the Complainants' Motion to Compel should be denied as untimely. In the alternative, it should be denied for the substantive reasons stated above.

Dated: January 30, 2019

  
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January 23, 2018

**VIA OVERNIGHT UNITED PARCEL SERVICE**

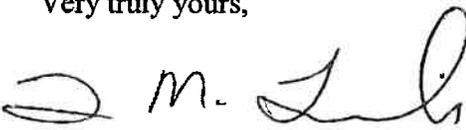
Larry and Ellen Kramer  
101 South College Street  
Myerstown, PA 17067

**Re: Larry and Ellen Kramer v. Metropolitan Edison Company**  
**Docket No. C-2017-2630621**

Dear Mr. and Mrs. Kramer:

Enclosed please find the Interrogatories and Requests for Production of Documents (Set I) to Larry and Ellen Kramer. Pursuant to 52 Pa. Code §§ 5.341 and 5.349, *et seq.*, your answers are due within twenty days of service of this letter (February 13, 2018). In addition, any objections are due within ten days of service of this letter (February 3, 2018). This document has been served as indicated within the Certificate of Service.

Very truly yours,



Lauren Lepkoski

Enclosures

- c: As Per Certificate of Service  
The Honorable Jeffrey A. Watson, Public Utility Commission (Cover Letter and Certificate)  
Rosemary Chiavetta, Esq., Public Utility Commission (Cover Letter and Certificate)

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**LARRY AND ELLEN KRAMER** :  
 :  
 v. : **DOCKET NO. C-2017-2630621**  
 :  
**METROPOLITAN EDISON COMPANY** :

**INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS OF  
METROPOLITAN EDISON COMPANY TO LARRY AND ELLEN KRAMER, SET I**

Metropolitan Edison Company (“Met-Ed” or “Company”) hereby propounds these Interrogatories and Requests for Production of Documents (Set I) to Larry and Ellen Kramer (the “Complainants”). Telephone or other contact concerning availability and timing of formal responses is encouraged. The answer to each interrogatory should be started on a new page. The answers should restate the question asked and indicate the person(s) supplying the information.

Pursuant to 52 Pa. Code § 5.342, you must send your answers to me within 20 days (February 13, 2018) and any objections within 10 days (February 3, 2018). Your answers and objections should not be filed with the Pennsylvania Public Utility Commission. You should only file the cover letter and certificate of service with the Commission’s Secretary Rosemary Chiavetta. If you have any objection to any of the interrogatories or requests for documents, please identify the interrogatory or request and state your objection in full as to why you should not have to answer/produce it. Any objection not raised within the 10-day period provided for by 52 Pa. Code § 5.342(c) will be deemed waived and you will not be permitted to raise the objection at a later time.

Dated: January 23, 2018

**INSTRUCTIONS**

- A. In answering these interrogatories and requests for production of documents, please furnish all information available to you, including any such information possessed by others that you can obtain, and not merely such information known of your own personal knowledge. If you cannot answer the interrogatories and requests in full after exercising due diligence to secure the information to do so, so state and answer to the extent possible.
- B. Other than for the reasons identified herein, you must provide an answer to all interrogatories and requests for production of documents. If the answer to the question is “none” or “unknown,” such statement must be written in the answer. If you consider the question to be inapplicable, “N/A” must be written in the answer. If an answer is omitted because of a claim of privilege, the basis of privilege is to be stated.
- C. If the answer to any of the interrogatories and requests for production of documents is that you lack knowledge of some or all of the requested information, describe all efforts made by you to obtain the information necessary to answer that interrogatory or request.
- D. These interrogatories and requests for production of documents are to be deemed continuing in nature, and you shall promptly supply, by way of supplemental response, any additional responsive information that may become known to you or anyone acting on your behalf after your answers have been prepared or served.
- E. As used herein, the terms “Complainants” and “you” refer to Larry and Ellen Kramer, their attorneys, agents, or representatives.
- F. As used herein, the terms “Company,” “Met-Ed,” and “Respondent” refer to the Metropolitan Edison Company, and any agent, agency, or affiliate thereof.

G. As used herein, the term “proceeding” refers to the instant complaint proceeding at the Pennsylvania Public Utility Commission at Docket No. C-2017-2630621.

H. As used herein, the terms “service location,” “property,” or “home” refer to your service address of 101 South College Street, Myerstown, PA 17067.

I. As used herein, the term “household” refers to you and all other individuals who reside at the service location.

J. As used herein, the terms “document” or “documentation” include any written, printed, typed, recorded, or graphic matter, whether produced or reproduced or stored on paper, cards, tapes, film, electronic facsimile, computer storage devices or any other devices or media, including, but not limited to papers; books; letters; photographs; objects; tangible things; correspondence; e-mails; websites; webpages; telegrams; cables; telex messages; memoranda; medical records; notes; notations; records; work papers; transcripts; minutes; reports and recordings of telephone or other conversations, or of interviews, or of conferences, or of other meetings; affidavits; statements; opinions; proposals; reports; surveys; plans; studies; analyses; audits; evaluations; contracts; agreements; journals; statistical records; invoices; receipts; desk calendars; appointment books; diaries; lists; tabulations; summaries; sound recordings; computer printouts; data processing input and output; microfilms; all records kept by electronic, photographic, or mechanical means; and things similar to any of the foregoing, however denominated. When one or more of the foregoing documents is requested or referred to, the request or reference shall include, but is not limited to, the original and each and every copy and draft thereof having writings, notations, corrections, or markings unique to such copy or draft.

K. As used herein, all other words are to be given their ordinary and usual meanings, according to a current edition of Webster’s Dictionary.

**INTERROGATORIES OF METROPOLITAN EDISON COMPANY TO LARRY AND  
ELLEN KRAMER, SET I**

1. To your knowledge, has a smart meter been installed by the Company at your property?
2. Please describe in detail how you believe a smart meter operates.
3. Do you believe the installation of a smart meter at your property would create or worsen health issues for a member of your household?
4. If the answer to question 3 is yes, please provide the following information for each household member:
  - a. Name;
  - b. Age;
  - c. The specific health issues that you believe would be experienced after the smart meter is installed;
  - d. Whether the household member is already experiencing the specific health issues;
  - e. Whether the household member has experienced the specific health issues within the last four years;
  - f. Any medication prescribed to the household member;
  - g. Whether the household member has visited a medical professional for the specific health issue, and if so, the name, address, and phone number of the medical professional and the date of the visit(s) to the medical professional; and
  - h. Whether a medical professional has determined that the installation of a smart meter would create or worsen the specific health issue.
5. Please explain how the installation of a smart meter would create or worsen health issues for your household members. Be as specific as possible.
6. Please provide the following information in support of your position that health issues at your household would be created or worsened by the installation of a smart meter.
  - a. Please identify each document you rely on in support of your position.
  - b. Do you intend to rely on these documents at the time of the hearing in this proceeding?
  - c. Please describe in detail all information you have to support this position.

- d. Do you have any relevant educational or work background that qualifies you to assert this position?
- e. If yes, please identify the relevant educational or work background that qualifies you to assert this position.
7. Would you consider yourself a medical professional?
  - a. If yes, please identify your medical professional title, relevant educational experience, and relevant work experience.
8. Do you believe the installation of a smart meter at your property would create safety concerns for a member of your household?
9. If the answer to question 8 is yes, please specifically identify each of your safety concerns related to smart meters.
10. Please provide the following information regarding your position that the installation of a smart meter would create safety concerns:
  - a. Please identify each document you rely on in support of the position.
  - b. Do you intend to rely on these documents at the time of the hearing in this proceeding?
  - c. Please describe in detail all information you have to support this position.
  - d. Do you have any relevant educational or work background that qualifies you to assert this position?
  - e. If yes, please identify the relevant educational or work background that qualifies you to assert this position.
11. Do you believe the installation of a smart meter at your property would have an impact on radio frequency ("RF") at your home?
12. If yes to question 11, please specifically identify all of the RF impacts associated with the installation of a smart meter.
13. Please provide the following information regarding your position related to the RF impact of a smart meter:
  - a. Please identify each document you rely on in support of this position.
  - b. Do you intend to rely on these documents at the time of the hearing in this proceeding?
  - c. Please describe in detail all information you have to support this position.

- d. Do you have any relevant educational or work background that qualifies you to assert this position?
  - e. If yes, please identify relevant educational or work background that qualifies you to assert this position.
14. Are there any cordless phones used in your home?
- a. Do you use a cellular phone?
  - b. Does anyone in your home use a cellular phone?
  - c. How many cellular phones are in use at your home?
15. Is there a microwave oven in your home?
- a. If yes, where is it located?
16. Is there satellite television in your home?
- a. If yes, where is it located?
  - b. How many satellite televisions are in use at your home?
17. Is there a laptop computer in your home?
- a. If yes, where is it located?
  - b. How many laptop computers are in use at your home?
18. Is there a wireless internet device in your home?
- a. If yes, where is it located?
  - b. How many wireless internet devices are in your home?
19. Is it your position that a customer has the right to request a smart meter not be installed at his or her service location?
20. Is it your position that Act 129 of 2008 does not require the utility to install smart meters throughout its service territory?
21. Is it your position that you would like to opt out completely from smart meter installation?
22. Do you believe the installation of a smart meter at your property would violate the privacy of a member of your household?

23. If yes to question 22, please specifically describe each of your concerns regarding your household's privacy after the installation of a smart meter.
24. Please provide the following information regarding your position that the installation of a smart meter would violate your household's privacy:
  - a. Please identify each document you rely on in support of the position.
  - b. Do you intend to rely on these documents at the time of the hearing in this proceeding?
  - c. Please describe in detail all information you have to support this position.
  - d. Do you have any relevant educational or work background that qualifies you to assert this position?
  - e. If yes, please identify the relevant educational or work background that qualifies you to assert this position.
25. Do you believe the installation of a smart meter at your property will increase the risk of hacking?
26. If yes to question 25, please specifically describe each of your concerns regarding hacking due to the installation of a smart meter.
27. Please provide the following information regarding your position that the installation of a smart meter would increase the risk of hacking:
  - a. Please identify each document you rely on in support of the position.
  - b. Do you intend to rely on these documents at the time of the hearing in this proceeding?
  - c. Please describe in detail all information you have to support this position.
  - d. Do you have any relevant educational or work background that qualifies you to assert this position?
  - e. If yes, please identify the relevant educational or work background that qualifies you to assert this position.
28. Do you believe the installation of a smart meter at your property will create a fire risk?
29. If yes to question 28, please specifically describe each of your concerns regarding the fire risk created by the installation of a smart meter.
30. Please provide the following information regarding your position that the installation of a smart meter would create a fire risk:

- a. Please identify each document you rely on in support of the position.
  - b. Do you intend to rely on these documents at the time of the hearing in this proceeding?
  - c. Please describe in detail all information you have to support this position.
  - d. Do you have any relevant educational or work background that qualifies you to assert this position?
  - e. If yes, please identify the relevant educational or work background that qualifies you to assert this position.
31. Do you believe the installation of a smart meter at your property will create reliability problems?
32. If yes to question 31, please specifically describe how the installation of a smart meter creates reliability problems.
33. Please provide the following information regarding your position that the installation of a smart meter would create reliability problems:
- a. Please identify each document you rely on in support of the position.
  - b. Do you intend to rely on these documents at the time of the hearing in this proceeding?
  - c. Please describe in detail all information you have to support this position.
  - d. Do you have any relevant educational or work background that qualifies you to assert this position?
  - e. If yes, please identify the relevant educational or work background that qualifies you to assert this position.
34. Do you believe the installation of a smart meter at your property will increase your electricity bills?
35. If yes to question 34, please specifically describe how the installation of a smart meter will increase your electricity bills.
36. Please provide the following information regarding your position that the installation of a smart meter would increase your electricity bills:
- a. Please identify each document you rely on in support of the position.
  - b. Do you intend to rely on these documents at the time of the hearing in this proceeding?

- c. Please describe in detail all information you have to support this position.
37. Do you believe the installation of a smart meter at your property violates the Pennsylvania Constitution?
38. If yes to question 37, please specifically describe how the installation of a smart meter at your property violates the Pennsylvania Constitution.
39. Please provide the following information regarding your position that the installation of a smart meter would violate the Pennsylvania Constitution:
- a. Please identify each document you rely on in support of the position.
  - b. Do you intend to rely on these documents at the time of the hearing in this proceeding?
  - c. Please describe in detail all information you have to support this position.
40. In your complaint, you state that you felt "bullied, harassed, and bureaucratically terrorized by Met-Ed." Please provide the following information related to this statement:
- a. Please describe in detail the events you are referring to in this statement.
  - b. What documents do you rely on in support of this statement?
  - c. Do you intend to rely on these documents at the time of the hearing in this proceeding?
  - d. Do you have any relevant educational or work background that qualifies you to make this statement?
  - e. If yes, please identify relevant educational or work background that qualifies you to make this statement.
41. In your complaint, you state that "Mt. Aetna Bible Church at 11 North Chestnut Street, Mt. Aetna, PA 19544, experienced a smoldering smart meter with damage to the exterior, interruption of service, and disturbance to church and other community activities." Please provide the following information related to this statement:
- a. Please describe in detail the events you are referring to in this statement.
  - b. What documents do you rely on in support of this statement?
  - c. Do you intend to rely on these documents at the time of the hearing in this proceeding?

42. In your amended complaint, you state that you “recently became aware that the deteriorating health of all three of the Kramers...is likely caused by unsafe conditions of the Met-Ed electrical power distribution system occurring near or attached to their property.” Please answer the following questions related to this statement:
- a. Please describe in detail the information you have to support this statement.
  - b. What documents do you rely on in support of this statement?
  - c. Do you intend to rely on these documents at the time of the hearing in this proceeding?
  - d. Do you have any relevant educational or work background that qualifies you to make this statement?
  - e. If yes, please identify relevant educational or work background that qualifies you to make this statement.
43. In your amended complaint, you state that “exposure to certain bursts of low-level RF radiation is known to exacerbate certain medical conditions, including the ailments suffered by the Complainants.” Please answer the following questions related to this statement:
- a. Please describe in detail the information you have to support this statement.
  - b. Please specifically describe how exposure to RF radiation exacerbates the ailments of the Complainants.
  - c. What documents do you rely on in support of this statement?
  - d. Do you intend to rely on these documents at the time of the hearing in this proceeding?
  - e. Do you have any relevant educational or work background that qualifies you to make this statement?
  - f. If yes, please identify relevant educational or work background that qualifies you to make this statement.
44. In your amended complaint, you state that “all smart meters contain a switched-mode power supply element... which may pose additional deleterious health effects in sensitive or medically vulnerable individuals such as Complainants through its effect of causing so called ‘dirty electricity’ or transients or harmonics on the household wiring.” Please answer the following questions related to this statement:
- a. Please describe in detail the information you have to support this statement.

- b. What documents do you rely on in support of this statement?
  - c. Do you intend to rely on these documents at the time of the hearing in this proceeding?
  - d. Do you have any relevant educational or work background that qualifies you to make this statement?
  - e. If yes, please identify relevant educational or work background that qualifies you to make this statement.
45. Please list the specific issues you intend to raise at the hearing in this proceeding.
46. Please identify the legal support, including specific citations, for each of the issues raised within your complaint and amended complaint.
47. Please provide the following information for all witnesses you intend to call to testify at the hearing in this proceeding.
- a. Provide the full name of the witness.
  - b. Provide the contact information of the witness.
  - c. Provide the title or position held by the witness.
  - d. Provide the educational background of the witness.
  - e. Provide the employment background of the witness.
  - f. Provide the scope of the testimony for the witness.
48. Would any witness identified in question 47 be offered as an expert?
- a. If yes, provide the curriculum vitae of the witness and state the scope of the testimony of the expert witness.
49. Please describe in detail your educational background.
- a. Please list any relevant certificates, trainings, or degrees that you obtained.
  - b. Please provide a description of the certificate, training, or degree.
  - c. Please provide the date that any certificate, training, or degree was obtained.
  - d. Please provide the name and address of the institution which provided the certificate, training, or degree.
50. Please describe in detail your employment history.

- a. Please provide your employer name and address.
- b. Please provide the title of your position.
- c. Please provide the dates of your employment.
- d. Please provide the duties performed in your position.

**REQUESTS FOR PRODUCTION OF DOCUMENTS OF METROPOLITAN EDISON  
COMPANY TO LARRY AND ELLEN KRAMER, SET I**

51. Please provide copies of all documentation supporting your position that health issues in your household would be created or worsened by smart meter installation.
52. Please provide copies of all documentation supporting your position that the installation of a smart meter at your property would create safety issues.
53. Please provide copies of all documentation supporting your position that the installation of a smart meter would create radio frequency exposure that would exacerbate the health issues of members of your household.
54. Please provide copies of all documentation supporting your position related to the privacy issues created by smart meters.
55. Please provide copies of all documentation supporting your position that the installation of a smart meter increases the risk of hacking.
56. Please provide copies of all documentation supporting your position that customers may opt out of smart meter installation.
57. Please provide copies of all documentation supporting your position that the installation of a smart meter creates a fire risk.
58. Please provide copies of all documentation supporting your position that the installation of a smart meter creates reliability problems.
59. Please provide copies of all documentation supporting your position that the installation of a smart meter would increase your electricity bills.
60. Please provide copies of all documentation supporting your position that the installation of a smart meter would violate the Pennsylvania Constitution.
61. Please provide copies of all documentation supporting your position that you were bullied, harassed, and bureaucratically terrorized by the Company.
62. Please provide copies of all documentation supporting your position related to a smart meter fire at Mt. Aetna Bible Church at 11 North Chestnut Street, Mt. Aetna, PA 19544.
63. Please provide copies of all documentation supporting your position that the switched-mode power supply element of smart meters creates dirty electricity, transients, or harmonics.
64. Please provide copies of all proposed exhibits you intend to submit for the hearing in this proceeding.

65. Please provide copies of all documentation referenced in your complaint and amended complaint.
66. Please provide copies of all documentation you are relying upon in support of your positions in this proceeding.

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**LARRY AND ELLEN KRAMER**

v.

**METROPOLITAN EDISON COMPANY**

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**DOCKET NO. C-2017-2630621**

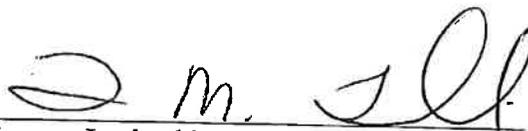
**CERTIFICATE OF SERVICE**

I hereby certify that I have this day served a true copy of the Interrogatories and Requests for Production of Documents of Metropolitan Edison Company to Larry and Ellen Kramer upon the individuals listed below, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

Service by overnight United Parcel Service, postage prepaid, as follows:

Larry and Ellen Kramer  
101 South College Street  
Myerstown, PA 17067

Dated: January 23, 2018



Lauren Lepkoski  
FirstEnergy Service Company  
2800 Pottsville Pike  
P.O. Box 16001  
Reading, Pennsylvania 19612-6001  
(610) 921-6203  
[llepkoski@firstenergycorp.com](mailto:llepkoski@firstenergycorp.com)

Counsel for Metropolitan Edison Company

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**LARRY R. KRAMER AND  
ELLEN M. KRAMER**

v.

**METROPOLITAN EDISON COMPANY**

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**Docket No. C-2017-2630621**

**CERTIFICATE OF SERVICE**

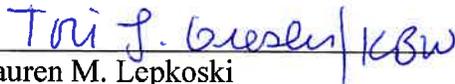
I hereby certify that I have this day served a true copy of the Answer of Metropolitan Edison Company to the Motion to Compel of Larry R. Kramer and Ellen M. Kramer upon the individuals listed below, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

Service by first class mail, postage prepaid, as follows:

Larry R. Kramer and Ellen M. Kramer  
101 South College Street  
Myerstown, PA 17067

Administrative Law Judge Jeffrey A. Watson  
Pennsylvania Public Utility Commission  
Piatt Place, Suite 220  
301 5<sup>th</sup> Avenue  
Pittsburgh, PA 15222

Dated: January 30, 2019

  
Lauren M. Lepkoski  
Tori L. Giesler  
FirstEnergy Service Company  
2800 Pottsville Pike  
P.O. Box 16001  
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