

February 1, 2019

Via Electronic Filing

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street
2nd Floor, Room-N201
Harrisburg, PA 17120

**RE: Michele Hriadil and Francis Hriadil v. Duquesne Light Company
Docket No. C-2016-2571726**

Dear Secretary Chiavetta:

Enclosed please find Duquesne Light Company's Motion in Limine to Bar Complainants From Introducing or Relying Upon Inadmissible Evidence. A copy of this document has been served upon Complainants in accordance with Commission regulations.

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

Sincerely,



Jeremy V. Farrell
Attorney for Duquesne Light Company

Paul Shane Miller
Attorney for Duquesne Light Company

Enclosure

cc: Michele Hriadil and Francis Hriadil (with enclosure)
Administrative Law Judge Jeffrey Watson (with enclosure)

TADMS:5086655-1 014657-158498

and prohibit Complainants from relying upon it at the hearing because those materials are irrelevant and unreliable, as explained in more detail below.

II. Argument

The Presiding ALJ has ruled that the only issue in this case is whether Duquesne Light has violated the Code (which requires Duquesne Light to install a smart meter at Complainants' residence), the associated regulations, or the Company's tariff. First Supplemental Prehearing Order, Feb. 6, 2018; Prehearing Order, Dec. 15, 2017. This action is not a collateral attack on Duquesne Light's smart meter implementation plan, which the Commission has already approved, see, e.g., Docket No. M-2009-2123948 (Pa. P.U.C. Opinion and Order entered May 6, 2014), nor is it a challenge to the scientific merit of Act 129's mandatory universal deployment of smart meters, which is settled law and binding precedent.² The evidence introduced at the hearing should be that which is both reliable and relevant to the issues to be decided.

During discovery, Complainants produced hundreds of documents, articles, and videos to Duquesne Light. Complainants have not filed or served a formal exhibit list (which they were required to do by June 29, 2018 by virtue of the Presiding ALJ's First Supplemental Prehearing Order dated February 6, 2018), but have previously stated that they plan to rely at the hearing on the documents they served to Duquesne Light in discovery. See Exhibit A. They have never identified which specific portions of the hundreds of items they produced they will actually rely upon at the hearing, which has prejudiced Duquesne Light's ability to prepare for trial and to even prepare this motion (as Complainants' failure to specify their hearing exhibits forces Duquesne Light to address all of their documents *en masse*).

The sheer volume of Complainants' production makes it impossible for Duquesne Light to attach all the materials Complainants have referenced or produced to this motion. However,

² See Evans v. PECO Energy Co., Docket No. C-2017-2628542, 2017 WL 6766256, at *4 (Pa. P.U.C. Dec. 12, 2017) (Heep, ALJ) (there is no provision in the Code, the Commission's Regulations or Orders that allows a customer to "opt out" of receiving a smart meter); Francis v. PECO Energy Co., Docket No. C-2014-2451351, 2015 WL 5011620, at *6 (Pa. P.U.C. Aug. 20, 2015) (same).

Duquesne Light has prepared an index listing those documents and videos. A copy is attached as Exhibit B. The index, which itself spans 26 pages, contains 211 different items³ upon which Complainants apparently intend to rely at the hearing that Duquesne Light contends are inadmissible.

Given the volume of Complainants' production, it is impossible for Duquesne Light to review its objections to each of them individually, so the Company has summarized its objections to each document or video listed in Exhibit B. Duquesne Light's objections can be broken down into the following categories: (1) relevancy; (2) confusing the issues, wasting time, and needlessly presenting cumulative evidence; (3) hearsay; and (4) testimony from proceedings to which Duquesne Light was not a party. In the following bullet points, Duquesne Light briefly elaborates on the nature of, and reasons for, each objection:

- Relevancy: Nearly all documents and videos produced by Complainants are unrelated to Duquesne Light, its smart meters, or its smart meter practices; they instead address smart meters or radiofrequency in general. Such documents add nothing to determining whether Duquesne Light has violated the Code, a regulation, or its tariff. They are irrelevant and inadmissible under 52 Pa. Code § 5.401 and Pennsylvania Rules of Evidence 401 and 402. Just a few examples of such irrelevant documents include news articles about fires allegedly caused by smart meters that Duquesne Light is not using and that occurred outside of the Company's service territory; cybersecurity breaches at companies with no relationship to Duquesne Light; and articles and statements about the alleged vulnerabilities of the "smart grid" in general.
- Confusing the issues, wasting time, and needlessly presenting cumulative evidence: Even if Complainants' documents and videos are marginally relevant to this case (and they are not), their probative value is outweighed by the factors in 52 Pa. Code § 5.401 and Pennsylvania Rule of Evidence 403, including confusing the issues, wasting time, and needlessly presenting cumulative evidence. For example, documents and videos about the supposed dangers of all smart meters confuse the issues and waste time because this case deals with Duquesne Light's smart meters, not other companies or brands. See First Supplemental Prehearing Order, Feb. 6, 2018. Similarly, articles about cyber hacks at other companies confuse the issues and waste time by distracting from the relevant question, which is whether Duquesne Light's cybersecurity measures

³ Duquesne Light has endeavored in good faith to capture all documents and materials produced by Complainants, but with so voluminous a production, it is possible that a few have been missed. Duquesne Light reserves the right to object to any such document at the hearing.

are sufficient. Finally, the sheer volume of Complainants' proposed exhibits will waste time and needlessly present cumulative evidence.

- Hearsay: People other than Complainants wrote or created nearly all of the documents and videos listed in Exhibit B; most were not written or created by Complainants.⁴ Yet Complainants plan to offer them into evidence to prove the truth of the matters stated in each document or video. That is textbook hearsay. Well-established Commission precedent states that hearsay cannot form the basis for a finding of fact if properly objected to. Hoffman-Lorah v. PPL Elec. Util. Corp., Docket No. C-2018-2644957, 2018 WL 6124349, at *11 (Pa. P.U.C. Nov. 14, 2018) (Barnes, ALJ). And even if hearsay is admitted into evidence without objection, it cannot form the basis for a finding of fact unless supported by other competent evidence. Id. Simply stated, "a finding of fact based solely on hearsay will not stand." Id. So even if hearsay is admitted into evidence, it has little probative value because it cannot form the basis of a finding of fact. Moreover, even if found to be marginally relevant, these hearsay documents would still be subject to the § 5.401 considerations outlined and should be excluded for that additional reason.
- Testimony from proceedings to which Duquesne Light was not a party: Complainants seek to admit documents and videos from hearings about smart meters, radiofrequency, or similar topics that were held in other states or even other countries. For example, they seek to admit testimony before the Maryland legislature, a corporate commission in Arizona, and a utility commission in Canada. The Presiding ALJ should bar this evidence. Under 52 Pa. Code § 5.407, records from other proceedings may be admitted into evidence if the proceeding occurred before the Commission and the evidence is relevant and material to the case. Testimony from hearings in other states and countries plainly did not occur before the Commission, and is irrelevant in determining if Duquesne Light violated the Code, any associated regulations, or the Company's tariff.

III. Conclusion

Because the documents and videos listed in Exhibit B violate 52 Pa. Code §§ 5.401-5.403 and the Pennsylvania Rules of Evidence, Duquesne Light respectfully requests an order precluding Complainants from introducing or referencing any of the documents, videos, or things listed in Exhibit B at the hearing.

⁴ Complainant Francis Hriadil authored a few articles that were produced to Duquesne Light in which he opines about the safety of Duquesne Light's smart meters, radiofrequency, and scientific and technical subjects. Duquesne Light has already submitted a motion in limine asserting that Complainants do not qualify as expert witnesses; thus, the Company will not restate those arguments in full here. See Duquesne Light's Motion in Limine to Preclude Complainants' Expert Testimony for Failure to File Required Expert Reports. But in brief, the articles authored by Francis Hriadil should be excluded from evidence because a lay witness cannot provide opinion testimony about scientific, technical, or other matters requiring specialized knowledge. See Pa. R. Ev. 701.

Respectfully submitted,

TUCKER ARENSBERG, P.C.

A handwritten signature in cursive script, appearing to read "Paul Shane Miller", is written over a horizontal line.

Jeremy V. Farrell, Esquire
PA I.D. No. 316258
(412) 594-3938

Paul Shane Miller, Esquire
PA I.D. No. 319174
(412) 594-5503

1500 One PPG Place
Pittsburgh, PA 15222
Counsel for Respondent,
Duquesne Light Company

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Michele Hriadil and
Francis Hriadil,

Complainant,

vs.

DUQUESNE LIGHT COMPANY,

Respondent.

No: C-2016-2571726

**COMPLAINANTS EXPERT AND
FACTUAL WITNESS TESTIMONY
NOTIFICATION TO RESPONDENT**

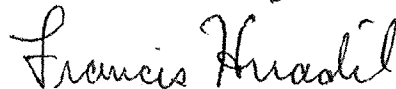
Filed by Michele and Francis Hriadil

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

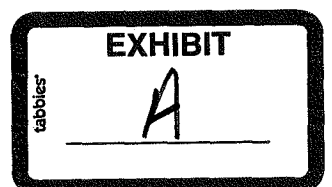
**COMPLAINANTS EXPERT AND FACTUAL WITNESS TESTIMONY NOTIFICATION
TO RESPONDENT**

**THIS IS COMPLAINANTS DISCOVERY NOTIFICATION TO THE RESPONDENT CONCERNING THE
APPEARANCE AND TESTIMONY OF ANY EXPERT AND FACTUAL WITNESSES AT THE
HEARING SCHEDULED FOR COMPLAINANTS FORMAL COMPLAINT.**

**A CERTIFICATE OF SERVICE HAS BEEN FILED WITH THE COMMISSION'S SECRETARY, PER
JUDGE WATSON'S FEBRUARY 6, 2018 FIRST SUPPLEMENTAL PRE-HEARING ORDER.**



Francis Hriadil
April 30, 2018



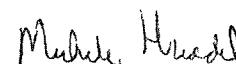
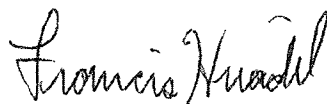
VERIFICATION

Per 52 Pa. Code S 1.36,

We, Francis Hriadil and Michele Hriadil, hereby state that the facts above set forth are true and correct (or are true and correct to the best of our knowledge, information and belief) and that we expect to be able to prove the same at a hearing held in this matter. We understand that the statements herein are made subject to the penalties of 18 Pa.C.S. § 4904 (relating to unsworn falsification to authorities).

Date: 4/30/2018

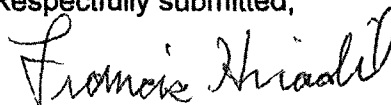
4/30/2018



Francis Hriadil

Michele Hriadil

Respectfully submitted,



Francis Hriadil
(412) 779-3314
331 Shady Ridge Drive
Monroeville, PA 15146
April 30, 2018

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Michele Hriadil and
Francis Hriadil,

Complainant,

vs.

DUQUESNE LIGHT COMPANY,

Respondent.

No: C-2016-2571726

CERTIFICATE OF SERVICE

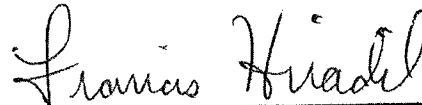
I hereby certify that I have this day served a true copy of the foregoing document upon the participant listed below in accordance with the requirements of 52 PA. Code § 1.54 (relating to service by a participant):

Via Paper Filing
Judge Jeffrey Watson
PA PUC Pittsburgh Administrative Law Judge Office
301 Fifth Ave, Suite 220
Piatt Place
Pittsburgh, PA 15222

Via Paper Filing
Jeremy V Farrell, Esquire
Paul S Miller, Esquire
1500 One PPG Place
Pittsburgh, PA 15222
(412) 594-5619 (Fax)

Counsels for Respondent, Duquesne Light Company

Dated this 30th day of April 2018



Michele and Francis Hriadil
331 Shady Ridge Drive
Monroeville, PA 15146

(412) 779-3314
hriadil@attglobal.net

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Michele Hriadil and
Francis Hriadil,

Complainant,

vs.

DUQUESNE LIGHT COMPANY,

Respondent.

No: C-2016-2571726

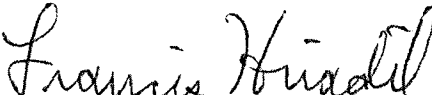
CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the Complainant's Expert and Factual Witness Testimony Notification to Respondent, verified as per 52 PA. Code §1.36, upon the participant listed below in accordance with the requirements of 52 PA. Code §1.54 (relating to service by a participant):

Via Paper Filing
Jeremy V Farrell, Esquire
Paul S Miller, Esquire
1500 One PPG Place
Pittsburgh, PA 15222
(412) 594-5619 (Fax)

Counsels for Respondent, Duquesne Light Company

Dated this 30th day of April 2018



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

	ARTICLE OR VIDEO NAME	AUTHOR OR SOURCE	DUQUESNE LIGHT'S OBJECTIONS
6	Living Inside an Electric Cage Without Knowing It	Dr. Doma	Relevance; Hearsay; Cumulative
7	Smart Meters: No Federal Mandate	Unknown	Relevance; Hearsay; Cumulative
8	Report by Dr. O. Carpenter	Dr. David O. Carpenter	Relevance; Hearsay; Cumulative
9	Comments on the Draft Report by the California Council on Science and Technology "Health Effects of Radio Frequency from Smart Meters"	Daniel Hirsch	Relevance; Hearsay; Cumulative
10	Commentary on the California Council on Science and Technology Report "Health Impacts of Radio Frequency from Smart Meters"	Dr. Karl Maret	Relevance; Hearsay; Cumulative
11	American Academy of Environmental Medicine Recommendations Regarding Electromagnetic and Radiofrequency Exposure	Amy L. Dean; William J. Rea	Relevance; Hearsay; Cumulative
12	The 10 Biggest Data Breaches of 2016 (So Far)	Sarah Kuranda	Relevance; Hearsay; Cumulative
13	Direct Testimony of Ruth Ann DeLost before the PUC on 8/9/09	Ruth Ann DeLost	Relevance; Hearsay; Cumulative

	ARTICLE OR VIDEO NAME	AUTHOR OR SOURCE	DUQUESNE LIGHT'S OBJECTIONS
14	Proceedings before the British Columbia Utilities Commission on March 11, 2013	N/A	Relevance; Hearsay; Cumulative; Testimony from other proceeding
15	Application for a Certificate of Public Convenience and Necessity for the Advanced Metering Infrastructure Project	BC Sustainable Energy Association	Relevance; Hearsay; Cumulative
16	IARC Classifies Radiofrequency Electromagnetic Fields as Possibly Carcinogenic to Human	World Health Organization	Relevance; Hearsay; Cumulative
17	Expert Report of Andrew Marino	Andrew Marino	Relevance; Hearsay; Cumulative
18	Testimony Catherine J. Frompovich v. PECO Energy Co.	Catherine J. Frompovich	Relevance; Hearsay; Cumulative
19	Administrative Law Judge's Ruling Seeking Clarification	ALJ Amy C. Yip-Kikugawa	Relevance; Cumulative
20	Pacific Gas and Electric Company's Response to ALJ's October 18, 2011 Ruling Directing it to File Clarifying Radio Frequency Information	Ann H. Kim; Chonda J. Nwamu (Attorneys for Pacific Gas and Electric Company)	Relevance; Cumulative
21	British Columbia Utilities Commission Proceedings (March 11, 2013)	Testimony of "Mr. Flynn"	Relevance; Hearsay; Cumulative; Testimony from other proceeding

	ARTICLE OR VIDEO NAME	AUTHOR OR SOURCE	DUQUESNE LIGHT'S OBJECTIONS
22	Application for a Certificate of Public Convenience and Necessity for the Advanced Metering Infrastructure Project	BC Sustainable Energy Association	Relevance; Hearsay; Cumulative
23	Electromagnetic Sensitivity and Electromagnetic Hypersensitivity: A Summary	Michael Bevington	Relevance; Hearsay; Cumulative
24	Statement	Dr. Otis W. Brawley	Relevance; Hearsay; Cumulative
25	Jefferson County power outage causes thousands of dollars in damage	Bridget McClure	Relevance; Hearsay; Cumulative
26	Grant of Equipment Authorization	Advanced Compliance Solutions Inc.	Relevance; Hearsay; Cumulative
27	Report of Partial Findings from the National Toxicology Program Carcinogenesis Studies of Cell Phone Radiofrequency Radiation in Hsd: Sprague Dawley SD rates (Whole Body Exposures)	Unknown	Relevance; Hearsay; Cumulative
28	Radiofrequency radiation (900 MHz)-induced DNA damage	Unknown	Relevance; Hearsay; Cumulative

	ARTICLE OR VIDEO NAME	AUTHOR OR SOURCE	DUQUESNE LIGHT'S OBJECTIONS
29	Tiny town's power surge fries, computer, appliances, siding	Kristen De Groot	Relevance; Hearsay; Cumulative
30	Diagram - First Energy Speakers' Bureau	Unknown	Relevance; Hearsay; Cumulative
31	BioInitiative Report: A Rationale for Biologically-based Public Exposure Standards for Electromagnetic Radiation	BioInitiative Working Group	Relevance; Hearsay; Cumulative
32	Biological and Health Effects of Microwave Radio Frequency Transmissions, A Review of the Research Literature, A Report to the Staff and Directors of the Eugene Water and Electric Board	Unknown	Relevance; Hearsay; Cumulative
33	Letter to the PA PUC Concerning the Adverse Health Effects Associated with Exposure to RF radiation, etc. from Smart Meters	Dr. David O. Carpenter	Hearsay; Cumulative
34	International Agency for Research on Cancer of the World Health Organization Classifies RF Electromagnetic Fields as Possibly Carcinogenic to Human	World Health Organization	Relevance; Hearsay; Cumulative
35	Official Statement to Dennis Kucinich	American Academy of Pediatrics	Relevance; Hearsay; Cumulative

	ARTICLE OR VIDEO NAME	AUTHOR OR SOURCE	DUQUESNE LIGHT'S OBJECTIONS
36	The Health Argument for Replacing Wireless Smart Meters with a Safe Metering Technology in Maryland	Ronald M. Powell	Relevance; Hearsay; Cumulative
37	Symptoms after Exposure to Smart Meter Radiation	Ronald M. Powell	Relevance; Hearsay; Cumulative
38	Ranking Electricity Meters for Risk to Health, Privacy, and Cyber Security	Ronald M. Powell	Relevance; Hearsay; Cumulative
39	Symptoms Resulting from Exposure to Radiofrequency/Microwave Radiation from Smart Meters	Ronald M. Powell	Relevance; Hearsay; Cumulative
40	Annotated Reference on Wireless Devices and Health	Ronald M. Powell	Relevance; Hearsay; Cumulative
41	Public Health Implications of wireless technologies	Cindy Sage; David O. Carpenter	Relevance; Hearsay; Cumulative
42	Smart Meter: Correcting the Gross Misinformation	La Maison du 21e siècle (Quebec-based magazine)	Relevance; Hearsay; Cumulative
43	Expert Reports Refuting the CCST Report "Health Impact of Radiofrequency from Smart Meters"	Thirteen authors	Relevance; Hearsay; Cumulative

	ARTICLE OR VIDEO NAME	AUTHOR OR SOURCE	DUQUESNE LIGHT'S OBJECTIONS
44	Report of Partial Findings from the National Toxicology Program Carcinogenesis Studies of Cell Phone Radiofrequency Radiation in Hsd	Unknown	Relevance; Hearsay; Cumulative
45	ACS Responds to New Study Linking Cell Phone Radiation to Cancer	David Sampson	Relevance; Hearsay; Cumulative
46	Spin vs. Fact: National Toxicology Program report on cancer risk from cellphone radiation	Joel M. Moskowitz, PhD.	Relevance; Hearsay; Cumulative
47	Major Cell Phone Radiation Study Reignites Cancer Questions	Dina Fine Maron	Relevance; Hearsay; Cumulative
48	Exposure to (Cell Phone) RF Radiation Linked to Tumors	Unknown	Relevance; Hearsay; Cumulative
49	Oxidative mechanisms of biological activity of low-intensity radiofrequency radiation	Igor Yakmenko; Olexandr Tsybulin; Evgeniy Sidorik; Diane Henshel; Olga Krylenko; Sergiy Krylenko	Relevance; Hearsay; Cumulative
50	What do experts who signed the International EMF Scientist Appeal say about electromagnetic fields?	Twenty-one individuals	Relevance; Hearsay; Cumulative

	ARTICLE OR VIDEO NAME	AUTHOR OR SOURCE	DUQUESNE LIGHT'S OBJECTIONS
51	Direct Testimony of Dr. Sam Milham, MD, MPH on Behalf of Warren Woodward and in Opposition to the Settlement Agreement (before the Arizona Corporation Commission)	Dr. Sam Milham	Relevance; Hearsay; Cumulative; Testimony from other proceeding
52	Expert Report of Andrew Marino in <i>Murphy v. PECO</i> (Pa. PUC)	Andrew Marino	Relevance; Hearsay; Cumulative
53	Smart Meter - What We Know -- Measurement Challenges and Complexities	EMF & RF Solutions	Relevance; Hearsay; Cumulative
54	Assessment of Radiofrequency Radiations Emissions from Smart Meters	Sage Associates	Relevance; Hearsay; Cumulative
55	Assessment of Radiofrequency Microwave Radiation Emissions from Smart Meters - Tables	Unknown	Relevance; Hearsay; Cumulative
56	Grant of Equipment Authorization Certification Issued Under the Authority of the Federal Communications Commission	Curtis-Straus LLC; Advanced Compliance Solutions, Inc.	Relevance; Hearsay; Cumulative
57	Evaluation of the ITRON Open Way AMI Meter	William Bathgate	Hearsay; Cumulative

	ARTICLE OR VIDEO NAME	AUTHOR OR SOURCE	DUQUESNE LIGHT'S OBJECTIONS
58	Why Regulatory Authorities Look for the UL Mark	Rich Berman	Relevance; Hearsay; Cumulative
59	Wireless Smart Meters and Potential for Electrical Fires	Sage Associates	Relevance; Hearsay; Cumulative
60	Analog Meters Withstand "Hot Sockets" Better Than Smart Meters	SkyVision Solutions	Relevance; Hearsay; Cumulative
61	Stockton Smart Meters Explode After Truck Causes Power Surge	Leigh Martinez	Relevance; Hearsay; Cumulative
62	Exploding smart meter heats up Queen's Park	Antonella Artuso	Relevance; Hearsay; Cumulative
63	Wireless Utility Meter Safety Impacts Survey	Ed Halteman	Relevance; Hearsay; Cumulative
64	Smart Meter fire situation continues to escalate	Andy Alcock	Relevance; Hearsay; Cumulative
65	Tiny town's power surge fries computers, appliances, siding	Kristen De Groot	Relevance; Hearsay; Cumulative
66	Cybersecurity: Challenges in Securing the Modernized Electricity Grid	Gregory C. Wilshusen & David C. Trimble	Relevance; Hearsay; Cumulative
67	FBI: Smart Meter Hacks Likely to Succeed	KrebsOnSecurity	Relevance; Hearsay; Cumulative
68	The 10 Biggest Data Breaches of 2016	Sarah Kuranda	Relevance; Hearsay; Cumulative
69	Here are all the ways the Equifax data breach is worse than you can imagine	Michael Hiltzik	Relevance; Hearsay; Cumulative

	ARTICLE OR VIDEO NAME	AUTHOR OR SOURCE	DUQUESNE LIGHT'S OBJECTIONS
70	KRACK Spells Big Trouble for Wireless Security	Scott Bekker	Relevance; Hearsay; Cumulative
71	Global Data Firm: "We Help Utilities Surveil and Profile Their Customers, and Monetize Home Surveillance Data"	Josh del Sol	Relevance; Hearsay; Cumulative
72	ONZO Announces Major Enhancements to Customer Insights Data Analytics Solution	ONZO	Relevance; Hearsay; Cumulative
73	Getting Smarter About the Smart Grid	Timothy Schoechele, PhD.	Relevance; Hearsay; Cumulative
74	Initial comments submitted on behalf of NSTAR Electric Company and Western Massachusetts Electric Company	Danielle C. Winter, Esq.	Relevance; Hearsay; Cumulative
75	Standard of reasonableness	Trans-lex Law Research	Relevance; Hearsay; Cumulative
76	<i>Gutierrez v. Lamagno</i> , 515 U.S. 417 (1995)	Justice Ginsburg	Relevance
77	What's the only word that means mandatory? Here's what law and policy say about "shall, will, may and must."	Federal Aviation Administration	Relevance; Hearsay; Cumulative
78	Background/Curriculum Vitae -- David O. Carpenter, MD	Unknown	Relevance; Hearsay; Cumulative

	ARTICLE OR VIDEO NAME	AUTHOR OR SOURCE	DUQUESNE LIGHT'S OBJECTIONS
79	Background/Curriculum Vitae -- Ronald M. Powell, PhD	Unknown	Relevance; Hearsay; Cumulative
80	Background/Curriculum Vitae -- Andrew A. Marino, PhD, JD	Unknown	Relevance; Hearsay; Cumulative
81	Background/Curriculum Vitae -- Samuel P. Milham, MD, MPH	Unknown	Relevance; Hearsay; Cumulative
82	Wingspread Conference on the Precautionary Principle	Unknown	Relevance; Hearsay; Cumulative
83	Biological Impacts	Justproveit.net	Relevance; Hearsay; Cumulative
84	Letter to Thomas P. Stanley, Chief Engineer (FCC)	Margo T. Oge (Director, Office of Radiation and Indoor Air, Environmental Protection Agency)	Relevance; Hearsay; Cumulative
85	Letter from HHS to Thomas P. Stanley (FCC)	Lillian J. Gill (Interim Director - Office of Science & Technology)	Relevance; Hearsay; Cumulative
86	Comments of the National Institute for Occupational Safety and Health of the FCC Proposed Rule on RF Radiation Exposure Guidelines	National Institute for Occupational Safety and Health	Relevance; Hearsay; Cumulative
87	Comments of Members of the ARRL Bio-Effects Committee	Members of the ARRL Bio-Effects Committee	Relevance; Hearsay; Cumulative
88	Letter to Janet Newton (President -- EMR Network)	Norbert Hankin (EPA)	Relevance; Hearsay; Cumulative

	ARTICLE OR VIDEO NAME	AUTHOR OR SOURCE	DUQUESNE LIGHT'S OBJECTIONS
89	Letter to Eli Veenendaal (National Telecommunications and Information Administration)	William R. Taylor (U.S. Dept. of Interior)	Relevance; Hearsay; Cumulative
90	Response to California Council on Science and Technology	DeKun Li	Relevance; Hearsay; Cumulative; Testimony from other proceeding
91	Pre-filed testimony of De-Kun Li	De-Kun Li	Relevance; Hearsay; Cumulative; Testimony from other proceeding
92	Smart Meters -- not so smart	Amy Worthington	Relevance; Hearsay; Cumulative
93	<i>Phillips v. County of Allegheny</i> , 515 F.3d 224 (3d Cir. 2008)	Judge Nygaard	Relevance
94	<i>In Re Cincinnati Radiation Litigation</i> , 874 F. Supp. 796 (S.D. Ohio 1995)	Judge Beckwith	Relevance
95	BioInitiative 2012 -- A Rationale for Biologically-based Exposure Standards for Low-Intensity Electromagnetic Radiation	BioInitiative Working Group 2012	Relevance; Hearsay; Cumulative
96	National Prevention Strategy	National Prevention, Health Promotion and Public Health Council (Office of the Surgeon General)	Relevance; Hearsay; Cumulative

	ARTICLE OR VIDEO NAME	AUTHOR OR SOURCE	DUQUESNE LIGHT'S OBJECTIONS
97	A Citizen's Guide to the NEPA	Council on Environmental Quality - Executive Office of the President	Relevance; Hearsay; Cumulative
98	Bibliography Of Reported Biological Phenomena ('Effects') And Clinical Manifestations Attributed To Microwave And Radio-Frequency Radiation	Naval Medical Research Institute	Relevance; Hearsay; Cumulative
99	Identification of Research Needs Relating to Potential Biological or Adverse Health Effects of Wireless Communication Devices	Committee on Identification of Research Needs Relating to Potential Biological or Adverse Health Effects of Wireless Communications Devices	Relevance; Hearsay; Cumulative
100	IN THE MATTER OF THE UTILITIES COMMISSION ACT R.S.B.C. 1996, CHAPTER 473 And Re: FortisBC Energy Inc. Application for a Certificate of Public Convenience and Necessity for the Advanced Metering Infrastructure Project	Proceedings Before the British Columbia Utility Commission (March 11, 2013)	Relevance; Hearsay; Cumulative; Testimony from other proceeding
101	FortisBC Inc. Advanced Metering Infrastructure CPCN	BC Sustainable Energy Association	Relevance; Hearsay; Cumulative
102	Why Regulatory Authorities Look for the UL Mark	Electrical Connections	Relevance; Hearsay; Cumulative

	ARTICLE OR VIDEO NAME	AUTHOR OR SOURCE	DUQUESNE LIGHT'S OBJECTIONS
103	Inside PECO's smart meter debacle	Barbara Vergetis Lundin	Relevance; Hearsay; Cumulative
104	PGE replacing 70,000 electricity meters because of fire risk	Ted Sickinger (The Oregonian)	Relevance; Hearsay; Cumulative
105	SaskPower to remove 105,000 smart meters following fires	CBC News (Canada)	Relevance; Hearsay; Cumulative
106	Reno smart meter fires more widespread than first feared	Anjeanette Damon (Reno Gazette Journal)	Relevance; Hearsay; Cumulative
107	Overheating Concerns: Lakeland Electric to Replace 10,657 Residential Smart Meters	John Chambliss (The Ledger)	Relevance; Hearsay; Cumulative
108	Reno, Sparks fire chiefs call for smart meter probe	Anjeanette Damon (Reno Gazette Journal)	Relevance; Hearsay; Cumulative
109	This Woman's Death May Confirm All Your Suspicions About Smart Meters	Daniel Jennings (Off the Grid News)	Relevance; Hearsay; Cumulative
110	Fear of fire hazard causes removal of thousands of smart meters	The Canadian Press	Relevance; Hearsay; Cumulative
111	Stockton Smart Meters Explode After Truck Causes Power Surge	Sacramento CBS Local News	Relevance; Hearsay; Cumulative

	ARTICLE OR VIDEO NAME	AUTHOR OR SOURCE	DUQUESNE LIGHT'S OBJECTIONS
112	Smart Meters Pose Ongoing Issues for Duquesne Light Customers	Jon Delano	Hearsay; Cumulative
113	Astonishing: Hydro One pulling plug on 36,000 rural smart meters after years of complaints	Kelly Egan (PostMedia News)	Relevance; Hearsay; Cumulative
114	Ontario Pulls Plug on 36,000 Rural Smart Meters: Is Big Energy Imploding	Josh Del Sol (Collective Evolution)	Relevance; Hearsay; Cumulative
115	Big rig crash into pole leads to power surge in Discovery Bay	ABC 7 News (California)	Relevance; Hearsay; Cumulative
116	Smart Meter security fears; SMeters Will Be Hacked, Warn Researchers	Big brother watch; Andrew Donoghue (E Week Europe)	Relevance; Hearsay; Cumulative
117	Smart Meter (Grid) Cyber Security -- Information Security within the future Smart Grid	Stephan Gerhager (Allianz Deutschland)	Relevance; Hearsay; Cumulative
118	Smart grid power up privacy worries	David Perera (Politico)	Relevance; Hearsay; Cumulative
119	Why the Latest Yahoo Hack is So Much Worse Than You Think	Kevin Kelleher (Time)	Relevance; Hearsay; Cumulative
120	World's Leading Hackers Explain Why You Don't Want Huge Tech Companies Controlling Everything in Your House	Lulu Friesdat (AlterNet)	Relevance; Hearsay; Cumulative

	ARTICLE OR VIDEO NAME	AUTHOR OR SOURCE	DUQUESNE LIGHT'S OBJECTIONS
121	Hackers Can Now Cause Blackouts on America's Electrical Grid, Report	Tyler Durden	Relevance; Hearsay; Cumulative
122	Security finally got the awareness it needed in 2017. Now what?	Alfred Ng (Cnet security)	Relevance; Hearsay; Cumulative
123	Interview with a Wellington Energy Whistleblower	Josh Hart (Stop the Crime website)	Relevance; Hearsay; Cumulative
124	Why Smart Meters Might be a Dumb Idea	Consumers Digest	Relevance; Hearsay; Cumulative
125	Overall Summary -- Smart Meter Facts Video (video)	Unknown	Relevance; Hearsay; Cumulative
126	Heath_1 (video)	David Carpenter	Relevance; Hearsay; Cumulative
127	Health_2 -- Smart Meters 100x Radiation Exposure of a Cell Phone (video)	Daniel Hirsch	Relevance; Hearsay; Cumulative
128	Health_3 -- Dirty Electricity and Diseases of Civilization (video)	Dr. Sam Milham	Relevance; Hearsay; Cumulative
129	Health_4 -- Buster -- Smart Meters Emit Constant Microwave Radiation (video)	WUSA 9 News Report	Relevance; Hearsay; Cumulative
130	Health_5 -- Take Back Your Power -- SM Radiation Density (video)	Unknown	Relevance; Hearsay; Cumulative
131	Health_6 -- 19 Health Effects of Electromagnetic Fields with David Carpenter (video)	Dr. David Carpenter	Relevance; Hearsay; Cumulative

	ARTICLE OR VIDEO NAME	AUTHOR OR SOURCE	DUQUESNE LIGHT'S OBJECTIONS
132	Health_7 -- 2015 International Scientist Appeal on Electromagnetic Fields (video)	Martin Blank, PhD	Relevance; Hearsay; Cumulative
133	Health_8 Wireless Wake up Call (video)	Jeremy Johnson	Relevance; Hearsay; Cumulative
134	Health_9 Nerve Disrupting Frequencies from Smart Meters (video)	Warren Woodward	Relevance; Hearsay; Cumulative
135	Privacy_1 Security - Citizen's Rights (video)	Unknown	Relevance; Hearsay; Cumulative
136	Privacy_2 Utility meters use in mass surveillance (video)	Jerry Day	Relevance; Hearsay; Cumulative
137	Privacy_3 ONZO Smart Meters Admission of In-home Surveillance for Profit (video)	ONZO	Relevance; Hearsay; Cumulative
138	Privacy_4 ONZO EPRI EU NILM 2016 (video)	Marel Hortsman	Relevance; Hearsay; Cumulative
139	Privacy_5 Citizen's Rights - Reliability - High Cost (video)	Michele Reisen (Michigan House of Representatives Testimony)	Relevance; Hearsay; Cumulative; Testimony from other proceeding
140	Reliability_1 Testimony before Congressional Subcommittee Hearing	Mr. Bennett Gaines (FirstEnergy Service Company)	Relevance; Hearsay; Cumulative; Testimony from other proceeding
141	Reliability_2 CBS KDKA News Report - Smart Meters Pose Ongoing Issues for Duquesne Light (video)	KDKA News	Hearsay; Cumulative

	ARTICLE OR VIDEO NAME	AUTHOR OR SOURCE	DUQUESNE LIGHT'S OBJECTIONS
142	Safety_1 Fires - Smart Meter Fires (video)	Brian Thiesen (Take Back Your Power)	Relevance; Hearsay; Cumulative
143	Security_CIA director calls smart grid stupid (video)	James Woolsey	Relevance; Hearsay; Cumulative
144	Security_2 - Safety Risk (video)	Sen. Patrick Colbeck (Testimony before Michigan House of Representatives)	Relevance; Hearsay; Cumulative; Testimony from other proceeding
145	Pulse modulated 900 MHz radiation induces hypothyroidism and apoptosis in thyroid cells	Meric Arda Esmekaya, Nesrin Seyhan, and Suna Omeroglu	Relevance; Hearsay; Cumulative
146	Submission to California Legislators by Martin Pall, PhD on biological and health effects from RF fields	Martin Pall, PhD	Relevance; Hearsay; Cumulative; Testimony from other proceeding
147	Cancer Expert Declares Cell Phone and Wireless Radiation as Carcinogenic to Humans	Anthony B. Miller, MD	Relevance; Hearsay; Cumulative
148	2018 ICD-10-CM/PCS Medical Coding Reference-International Classification of Diseases	American Diagnosis and Procedure Medical Bill Codes, 10/1/17	Relevance; Hearsay; Cumulative
149	Reduce EMF Exposure	Joseph M. Mercola, DO	Relevance; Hearsay; Cumulative
150	Joseph M. Mercola, DO Curriculum Vitae	Joseph M. Mercola, DO	Relevance; Hearsay; Cumulative
151	Martin L. Pall, PhD Curriculum Vitae	Martin L. Pall, PhD	Relevance; Hearsay; Cumulative

	ARTICLE OR VIDEO NAME	AUTHOR OR SOURCE	DUQUESNE LIGHT'S OBJECTIONS
152	New Large Animal Study, Like NTP's, Links RF to Schwannoma of the heart	Belopoggi Fiorella, PhD	Relevance; Hearsay; Cumulative
153	Report of final results regarding brain and heart tumors in Sprague-Dawley rats	L. Falcioni, et al	Relevance; Hearsay; Cumulative
154	Official comments and recommendations on National Toxicology Program RF Studies to US Dept of health and Human Services	Lennart Hardell, MD, PhD	Relevance; Hearsay; Cumulative
155	Actions from Peer Review of the Draft NTP Technical Reports on Cell Phone Radiofrequency Radiation	15 member Peer Review Panel – Chair – David Eaton, PhD – University of Washington	Relevance; Hearsay; Cumulative
156	Doctor's letter from Francis Hriadil's doctor stating that Francis Hriadil should not be exposed to RF/EMF Frequencies Generated by a Smart Meter based on his current clinical condition	Martin Gallagher, MD	Hearsay
157	Radiofrequency Radiation (RFR) as a Promoter/Enabler of Adverse Health Effects	Ronald N. Kostoff, PhD	Relevance; Hearsay; Cumulative

	ARTICLE OR VIDEO NAME	AUTHOR OR SOURCE	DUQUESNE LIGHT'S OBJECTIONS
158	Radio frequency radiation related cancer assessing causation in the occupational/ military setting	Michael Peleg	Relevance; Hearsay; Cumulative
159	Wireless Radiation/ Electromagnetic Fields Increases Toxic Body Burden	Investigative Report, Environment Health Trust	Relevance; Hearsay; Cumulative
160	Outdated FCC Safety Standards	Investigative Report, Environment Health Trust	Relevance; Hearsay; Cumulative
161	How Big Wireless Made Us think that cell phones are safe	Mark Hertsgaard, The Nation, Science and Health, Special Investigation Report	Relevance; Hearsay; Cumulative
162	MSP's Guide to 3 Game Changing Problems in Security	Scott Becker – Redmond Channel Partner magazine	Relevance; Hearsay; Cumulative
163	Apple's Tim Cook Calls for Regulation on Data, says Facebook Incident is Dire	Christopher Carbone – Fox News	Relevance; Hearsay; Cumulative
164	Facebook's Data Scandal Should be Wake-Up Call about Our Online Footprint	Arjun Kharpal – Investigative Report - CNBC	Relevance; Hearsay; Cumulative
165	Duquesne Light Seeks Rate Increase for 600,000 Customers	Jared Stonesifer – The Times	Relevance; Hearsay; Cumulative
166	Duquesne Light Company Rating	Revdex.com report	Relevance; Hearsay; Cumulative

	ARTICLE OR VIDEO NAME	AUTHOR OR SOURCE	DUQUESNE LIGHT'S OBJECTIONS
167	Comparing-NTP-and-RI-Studies-of-Sprague-Dawley-Rats-Exposure-to-Radiofrequency-Radiation-RFR-1 w link	https://ehtrust.org/wp-content/uploads	Relevance; Hearsay; Cumulative
168	Goldberg Sharon MD - Main Points and References from October 4th Michigan Legislature Testimony	https://ehtrust.org/wp-content/uploads	Relevance; Hearsay; Cumulative; Testimony from other proceeding
169	Testimony before the Michigan Legislature on Wireless Radiation October 2018 - video	Goldberg Sharon, MD	Relevance; Hearsay; Cumulative; Testimony from other proceeding
170	Goldberg Sharon MD - Curriculum Vitae	Unknown	Relevance; Hearsay; Cumulative
171	Lai Henry PHD - RFR12-14 RFR and ELF Research Summaries 1990 – 2017 2017_12_14	Henry Lai, PhD	Relevance; Hearsay; Cumulative
172	Lai Henry PHD - Curriculum Vitae	Unknown	Relevance; Hearsay; Cumulative
173	Lamech Federica MBBS - Symptom Development From Exposure to Radiofrequency Fields of Wireless Smart Meters - PubMed Listing	Frederica Lamech	Relevance; Hearsay; Cumulative
174	Lamech Federica MBBS - Symptom Development From Exposure to Radiofrequency Fields of Wireless Smart Meters in Victoria Australia	Frederica Lamech	Relevance; Hearsay; Cumulative

	ARTICLE OR VIDEO NAME	AUTHOR OR SOURCE	DUQUESNE LIGHT'S OBJECTIONS
175	PA PUC Expert Statement - Nov 30 2018	Andrew Michrowski, PHD	Hearsay; Cumulative
176	Andrew Michrowski, PHD - Curriculum Vitae	Unknown	Hearsay; Cumulative
177	Michrowski Andrew PHD - Dr Michrowski EMF Workshop Description	Unknown	Relevance; Hearsay; Cumulative
178	Michrowski Andrew PHD - Electromagnetic fields - High-level microwave technology concerns Andrew Michrowski PHD 42391c31ef	Unknown	Relevance; Hearsay; Cumulative
179	Michrowski Andrew PHD - ELECTROMAGNETIC POLLUTION - A Michrowski PHD	Unknown	Relevance; Hearsay; Cumulative
180	Michrowski Andrew PHD - pace flyer memberlist & origin & aims	Unknown	Relevance; Hearsay; Cumulative
181	NIH - High exposure to radio frequency radiation associated with cancer in male rats 2018_11_01	National Institutes of Health	Relevance; Hearsay; Cumulative
182	Sage Burgio - Electromagnetic Fields Pulsed Radiofrequency Radiation and Epigenetics How Wireless Technologies - Childhood Development Sage_Burgio_2017	Sage Burgio	Relevance; Hearsay; Cumulative
183	Peer Reviewed Scientific Research On Wireless Health Effects	Unknown	Relevance; Hearsay; Cumulative

	ARTICLE OR VIDEO NAME	AUTHOR OR SOURCE	DUQUESNE LIGHT'S OBJECTIONS
184	WIFI Radiation - Whats It Doing to Our Bodies 2018_04_27	Unknown	Relevance; Hearsay; Cumulative
185	Amid Health Privacy Fears States Are Letting People Reject Smart Meters 2016_02_105	Sarah Breitenbach	Relevance; Hearsay; Cumulative
186	Legal-Constitutional-and-Human-Rights-Violations-of-Smart-Grid-and-Smart-Meters1	Liz Barris	Relevance; Hearsay; Cumulative
187	Barris Liz - EMF Bio	Liz Barris	Relevance; Hearsay; Cumulative
188	Bathgate William S EE ME Curriculum Vitae	Unknown	Relevance; Hearsay; Cumulative
189	Bathgate William S EE ME - Expert Testimony before the MI Public Service Commission 2017_08_15 U-18322-0281	Unknown	Relevance; Hearsay; Cumulative; Testimony from other proceeding
190	California Warns About Cellphone Exposure And Health Risks - Investigative Report 2107_12_17	Forbes.com	Relevance; Hearsay; Cumulative
191	Michigan State Senator - Wireless-Radiation-Brief Colbeck 2018-09-20	Patrick Colbeck; https://www.senatorpatrickcolbeck.com/wp-content/uploads/2018/09/Wireless-Radiation-Brief.pdf	Relevance; Hearsay; Cumulative; Testimony from other proceeding

	ARTICLE OR VIDEO NAME	AUTHOR OR SOURCE	DUQUESNE LIGHT'S OBJECTIONS
192	Conrad Richard H PHD - Nine reasons why smart meter-systems are a mistake 2014_05_08	Richard Conrad, PhD; https://skyvisionsolutions.files.wordpress.com/2014/05/nine-reasons-why-smart-meter-systems-are-a-mistake-08-may-2014.pdf	Relevance; Hearsay; Cumulative
193	Conrad Richard H PHD - Testimony MPUC Docket No. 2011-00262	https://ecfsapi.fcc.gov/file/7520940952.pdf	Relevance; Hearsay; Cumulative
194	Conrad Richard H PHD - Curriculum Vitae	Unknown	Relevance; Hearsay; Cumulative
195	NM PRC bans Smart Meters	https://stopsmartmeters.org/2018/04/12/victory-against-smart-meter-scourge-in-new-mexico-radiation-emitting-devices-not-in-the-public-interest/	Relevance; Hearsay; Cumulative
196	NM new-mexico-prc-3-19-18-15-00312-ut-recommended-decision	New Mexico Public Regulation Commission	Relevance; Hearsay; Cumulative
197	NM new-mexico-prc-4-11-18-15-00312-ut-final-order	New Mexico Public Regulation Commission	Relevance; Hearsay; Cumulative
198	Playing with Fire - UL 2735 Certification of Itron Smart Meters 2016_02_25	http://www.stopsmartmetersbc.com/wp-content/uploads/2016/02/Playing-with-Fire-UL-Cert-of-Safety.pdf	Relevance; Hearsay; Cumulative
199	WA State's utilities must offer smart meter opt-out 2018_04	http://www.columbian.com/news/2018/may/28/states-utilities-must-offer-smart-meter-opt-out/	Relevance; Hearsay; Cumulative

	ARTICLE OR VIDEO NAME	AUTHOR OR SOURCE	DUQUESNE LIGHT'S OBJECTIONS
200	HEALTH_10 - video - 2017_08_20 - 58 min - Dr Mercola Interviews Martin Pall on EMFs	Unknown	Relevance; Hearsay; Cumulative
201	Manual - cv_mfc870dw_use_busr_lcl332001_a	Brother Printer Basic Users Guide	Relevance; Hearsay; Cumulative
202	Manual - WNA3100_UM_11Dec09	Wireless USB Adapter User Manual	Relevance; Hearsay; Cumulative
203	Letter to City of Kelowna Re: FortisBC's Notice for Smart Meters	Thermoguy	Relevance; Hearsay; Cumulative
204	MSP's Guide to 3 Game-Changing Problems in Security	Scott Bekker	Relevance; Hearsay; Cumulative
205	Functional brain MRI in patients complaining of electro hypersensitivity after long term exposure to electromagnetic fields	Gunnar Heuser and Sylvia A. Heuser (Journal -- Reviews on Environmental Health)	Relevance; Hearsay; Cumulative
206	Health Effects of Microwave Radio Exposures	Paul Dart	Relevance; Hearsay; Cumulative
207	Letter to California Legislators re: SB 649 on the Harmful Effects of Electromagnetic Fields on Health	Martin Pall	Relevance; Hearsay; Cumulative
208	Reduce EMF Exposure; The Harmful Effects of Electromagnetic Fields on Health: A Special Interview With Dr. Martin Pall	Dr. Joseph Mercola	Relevance; Hearsay; Cumulative

	ARTICLE OR VIDEO NAME	AUTHOR OR SOURCE	DUQUESNE LIGHT'S OBJECTIONS
209	2018 ICD-10-CM/PCS Medical Coding Reference - International Classification of Diseases	Unknown	Relevance; Hearsay; Cumulative
210	Outdated FCC "Safety" Standards	Environmental Health Trust	Relevance; Hearsay; Cumulative
211	Martin L. Pall -- CV	Martin L. Pall	Relevance; Hearsay; Cumulative

TADMS:5082255-1 014657-158498

