

No HARM, No Foul

Pennsylvania Public Utility Commission

Secretary. Rosemary Chiavetta
Pennsylvania Public Utility Commission
400 north street 2nd floor
Harrisburg ,Pennsylvania 17120

RECEIVED
OFFICE OF C.A.L.J.
19 JAN 21 AM 10:37
PA PUC

Lauren M. Leposki esq.
1ST Energy Ser. Co.
2800 Pottsville Pike
P.O box 16001
Reading, Penna.
19612 - 6001

Comm. Of Penna.
Public Utility Comm.
Admin. Law Judge , ALJ. Watson
400 N. St. Harrisburg, Penna.
17120

Plaintiffs:

Dorie Adams

VS

Defendants:

West Penn Power

Docket No. C-2018-3002271

In Accordance with the p rehearing order issued by Administrator Law Judge Jeffery A. Watson on Oct.18/2018 advised Mr. Dorie Adams intended to present the witnesses, Mr Richard Plummer , Mr Francias Anderson ,Mr. Reuben Adams at a future hearing to be scheduled for the above captions matter .

RECEIVED
JAN 14 2019
Pittsburgh Office of A.L.J.
Public Utility Commission

The names addresses and summaries of our witnesses are enclosed.

I apologize if this filing is considered overdue but all documents were filed in a timely manner with maybe the exception of these documents on Jan. 4/19 I waited to see if the defendants were going to file any objection they did not .This is what I gather from the defendants filing dated Jan. 3/19 I did not receive this note of filing until Jan.7/19 .

Copies were filed on time to Sec. Of Public Utility Comm. And Lauren Leposki of West Penn. Power Co. Thank you for your patient.

Date : _____

By: _____

Answers to Dorie's Questions: 16-18

16. Please provide the following formation for all witnesses you intend to call to testify at the hearing in this proceeding.

a. Provide the full name of the witness.

Richard Lee Plummer

b. Provide the contact information of the witness.

13604 NW 44th CT

VANCOUVER, WA 98685-1529

Cell phone: (360) 810-0162

c. Provide the title or position held by the witness.

Supervisory Security Specialist

DoD Civilian/GG-15 (Retired)

Defense Intelligence Agency (DIA)

d. Provide the educational background of the witness.

Master of Arts (MA), Security Management

Webster University, 1999

e. Provide the employment background of the witness.

Department of Defense Civilian Positions, 1992-2015

1) March 1992-November 1999

U.S. Army Special Operations Command (USASOC), Fort Bragg, NC

Department of Army Civilian, Security Specialist

2) November 1999-June 2004

Office of Naval Intelligence (ONI), Special Security Office (SSO)

with duty in Naples, Italy as the Regional Special Security Officer

Department of Navy Civilian, Security Specialist

3) June 2004-August 2008

U.S. European Command (USEUCOM), Stuttgart, Germany
Department of Army Civilian, Supervisory Security Specialist

4) August 2008-October 2015 (Retired 31 Oct 2015)

Defense Intelligence Agency (DIA) with duty at U.S European Command
(USEUCOM), Stuttgart, Germany

Department of Defense Civilian, Supervisory Security Specialist

U.S. Army & U.S. Army Reserve, Military Duty, 1974-1998

Active Duty: July 1974 – May 1987; served as Electronic Warfare Signals
Intelligence (EW/SIGINT) Specialist, with duty in Berlin, Germany and additional
assignments providing specialized Intelligence and Security support to the 5th and
10th Special Forces Groups at Fort Bragg, NC and Fort Devens, MA

Reserve Duty: May 1987-April 1998; served as EW/SIGINT Specialist, Intelligence
Analyst, Special Security Representative, Intelligence Instructor, and Company
First Sergeant during assignments with the 20th Special Forces Group, the 2nd Army
Intelligence Training Area School, and the 337th MI Battalion.

f. Provide the scope of the testimony for the witness. Privacy and Security

17. Would any witness identified in question 16 be offered as an expert?

a. Resume provided vice curriculum vitae

b. Scope of testimony: Privacy and Security

18. Please describe in detail your educational Background.

- See resume for education & training

19. Please describe in detail your employment history.

- See resume for work experience

HQ, U.S. European Command (USEUCOM)

Unit 30400

ATTN: ECJ2

APO, AE 09131 United States

06/2004 - 08/2008

Supervisory Security Specialist, GG-0080-14

Duties, Accomplishments and Related Skills:

Serves as Chief, Security Support Office (ECJ2-SSO), Intelligence Directorate, at Headquarters, U.S. European Command (USEUCOM), a regional combatant command (COCOM). Exercises management and direction of three subordinate branches providing personnel, physical, industrial, and information security, and SETA support to a joint command with a ninety-two country area of responsibility. Supervises a 14-person staff comprised of multi-service military personnel (active/reserve), and Department of Army civilians performing security functions in direct support to HQ, USEUCOM, and over fifty geographically dispersed elements of the command; as well as agencies and activities attached to or supporting the headquarters. Performs duties as the Chief Security Official and senior DOD Special Security Officer (SSO) within the European Theater providing oversight of over 250 SCI and/or collateral accredited facilities in ten countries. Serves as the Intelligence Directorate initial denial authority for the Freedom of Information Act (FOIA), and designated the USEUCOM Intelligence Oversight Officer. Works closely with Command's Operation Security (OPSEC), Counter Intelligence (CI), and Critical Infrastructure Protection (CIP) staffs to assess vulnerabilities, determine potential impact on military operations and recommend solutions. Responsible for the development of the command's security policies and directives; executes quarterly security manager training courses; oversees the development of cost effective mitigation strategies to correct security shortfalls, and manages investigation of security incidents. Overseas the construction, renovation, and/or accreditation of SCI Facilities and collateral working spaces (Open/Closed storage). Coordinates security issues with DOD agencies, clearance adjudication facilities, USEUCOM components, other COCOMs, DIA, and OUSD(I).

Provided direct security support to the newly formed U.S. Africa Command (AFRICOM); designed security structure, developed manning requirements and provided both SSO & Security Management support to the command until two new security offices were formed & manned. Designed and provided security oversight for the construction/accreditation/activation of the first ten SCIFs and twenty secure work areas for AFRICOM. Provided primary security support to the two COCOMs for a 23-month period until all security functions could be effectively handed off to the new AFRICOM security offices.

Office of Naval Intelligence

4251 Suitland Road

ATTN: ONI-522

Washington, DC 20395-5720 United States

11/1999 - 06/2004

Security Specialist, GG-0080-13

Duties, Accomplishments and Related Skills:

Assigned to the Office of Naval Intelligence (ONI) with duty in Naples, Italy. Served as the Regional Special Security Officer (SSO) responsible for the execution of physical,

personnel, information and technical security of intelligence operations under the cognizance of SSO NAVY for all Sensitive Compartment Information Facilities (SCIF) under the Naples Fleet Area SSO Plan. Supervises six-person office providing consolidated SSO/SCI security support to 30 multi-service and/or NATO elements located in the Naples area. Manages security of SCI information to include classification dissemination guidance, access control procedures, courier cards, clearance certification, security education travel briefings and the local Intelligence Oversight program. Manages local Personal Security for SCI indoctrinated personnel and coordinates issues with DONCAF, DSS, and/or OPM. Coordinates Polygraph requirements, oversees the SCI Access Management System for National/Navy SCI programs and investigates security violations. Reorganized office and expanded capabilities to become the SSO NAVY Regional office providing oversight of SSO/SCI Security programs/facilities for Navy USMC units in the EUCOM and CENTCOM regions; program now provides oversight/support to over 75 units in seven countries from the Arctic Circle to the Middle East. Develops security education programs within locally supported commands and exports information to Navy elements in the region. Conducts security assistance visits to regional SSO's to assess effectiveness of security operations, assist with self-inspections, preparation of facilities for DIA inspections and provide guidance on procedural improvements to security programs. Designs and provides oversight of constructions of new SCIFs under the cognizance of SSO NAVY; coordinates technical surveys; assists with facility accreditation. Also supports local Security Managers, NATO security personnel and other security professionals on issues of personnel, information, physical, operational, and/or technical security.

HQ, U.S Army Special Operations Command (USASOC)
BLDG D-3206
Fort Bragg, NC 28310 United States

10/1993 - 11/1999

Security Specialist, GG-0080-13

Duties, Accomplishments and Related Skills:

Served as the Special Security Officer (SSO) of a Major Army Command (MACOM) exercising Senior Intelligence Officer (SIO) cognizance over the Sensitive Compartment Information (SCI) security activities of the MACOM and three Major Subordinate Commands exercising command of approximately 26,000 Active and Reserve Component Army Special Operations (ARSOF) personnel. Developed and implemented SCI Security policies and procedures, reviewed/approved establishment of Special Security Offices in subordinate units; managed Tactical Sensitive Compartmented Information Facility (T-SCIF) deployments – approving over 75 T-SCIF deployments; provided oversight and investigation guidance of SCI security violations; supervised four-person office that administered the MACOM SCI Security Management Program for all SSO/SCI operations in over 85 units, 18 SCIFs, and over 4,200 SCI Billets assigned to the U.S. Army Special Operations Command. Managed the command SSO/SCI inspection program; coordinated and conducted security awareness training; served as primary instructor at the USASOC Security Manager Course; interfaced with DCI, DIA, DoD agencies, HQDA, Joint Commands, and other MACOMs on SCI security issues. Assisted units with design, construction, and accreditation of multiple SCIFs; approved concepts for establishment of Temporary Secure Working Areas; and reviewed/approved SCI Billets for subordinate elements. Served as focal point for resolution of Personnel Security issues concerning personnel with SCI access in coordination with the Army CCF and DSS. Managed PCOM (Eyes Only) message support for General Officers assigned to the command. Assisted subordinate units with preparation for DIA SCIF inspections; coordinated and hosted DIA SCI Security Official Mobile

Job Related Training:

- Training - OPSEC Awareness, (05/17/2013)
Defense Intelligence Agency
- Training - DIA FRONTLINE Supervisory Course, (05/18/2009)
Defense Intelligence Agency
- Training - Continuing Education for Senior Leaders, (09/12/2008)
40 Hrs, Army Management Staff College
- Training - Personnel Management for Executives (PME), (11/02/2006)
80 Hrs, Army Management Staff College
- Training - SSO NAVY ISSM Basic Education Course (03/04/2003)
16 Hrs, NAVY Information Assurance Training
- Training - NRO Special Security Officer Course (03/08/2002)
24 Hrs, Specialized Security Training
- Training - DCI Physical Security Seminar (10/27/2000)
40 Hrs, Specialized Physical Security Training
- Training - Dept of Navy SCI Admin/Physical Security Course (03/24/2000)
40 Hrs, Navy Special Security Officer Training
- Training - Information Operations Course (08/13/1999)
40 Hrs, Specialized Security Orientation training
- Training - OPSEC Officer Course (08/06/1999)
40 Hrs, Operations Security Training
- Training - Sustaining Base Leadership and Management (SLBM) Program (04/01/1999)
560 Hrs, Dept of Army Civilian Leadership training
- Training - Management Development Seminar (03/23/1998)
80 Hrs, DoD Civilian Leadership training
- Training - Leadership Education Development (LEAD) (01/26/1996)
40 Hrs, Dept of Army Civilian Leadership training
- Training - Intelligence Analyst Course (07/15/1988)
160 Hrs, Army Intelligence training

Affiliations: American Society of Industrial Security (ASIS) – Member
Special Forces Association (SFA) – Member
Disable American Veteran (DAV) – Life Member

References: References available upon request

Training Teams (MTT) to provide SSO training to personnel assigned to USASOC units. Completed Master of Arts (MA) Degree in Security Management while attending after work college classes.

Position description reviewed/revised and billet upgraded from GS-12 to GS-13 in June 1997.

HQ, U.S. Army Special Operations Command (USASOC)

Bldg E-2929

Fort Bragg, NC 28310 United States

03/1992 - 10/1993

Security Specialist, GG-0080-11

Duties, Accomplishments and Related Skills:

Served as the Tactical Sensitive Compartmented Information Facility (T-SCIF) Specialist for the Commander, USASOC and Major Subordinate Commands (MSC) with responsibility for all T-SCIF deployments/operations. Executed MACOM approval authority for worldwide deployment and establishment of T-SCIFs – approving the deployment of over 45 T-SCIFs in support of mission requirements; responsible for all physical and information security requirements for T-SCIF operations. Developed policy/procedures for deployments, articulated equipment requirements, interpreted/implemented DoD regulations, developed SOPs for use by assigned units. Established Program of Instruction (POI) and executed training classes on T-SCIF requirements in support of tactical intelligence operations. Served as the Assistant Special Security Officer (SSO) for the MACOM providing oversight of the SSO operations of Army Special Operations Forces (ARSOF) in CONUS. Assumed duties as the SSO upon departure of military supervisor; filled this position for 14 months while the responsibilities were being transitioned from a military to a civilian position. Designed provided construction oversight of new SCIF for the ARSOF Intelligence Center; provided guidance to subordinate units in the construction of two additional SCIFs. Initiated SCI Billet expansion program to improve deployment capability of ARSOF Reserve units. Provided direct input to DIA on their rewrite of DoD SCI Security regulations.

Education:

Webster University Fayetteville, NC United States

Master's Degree 03/1999

GPA: 3.89 of a maximum 4.0

Credits Earned: 36 Semester hours

Major: Security Management

Winthrop College Rock Hill, SC United States

Bachelor's Degree 12/1989

GPA: 3.85 of a maximum 4.0

Credits Earned: 120 Semester hours

Major: History **Honors:** Magna Cum Laude

York Technical College Rock Hill, SC United States

Associate's Degree 05/1988

GPA: 3.93 of a maximum 4.0

Major: Liberal Studies

**Additional
Information:**

Civilian Awards

Defense Intelligence Director's Award, DIA, 10/31/2015

2013 Director of Intelligence Senior Civilian of the Year, JIOCEUR/USEUCOM

Team Award for Excellence in Information Security, National Counterintelligence Executive,
12/16/2013

Defense Special Security Service (DSSS) Special Security Office of the Year, DIA, 2011

Security Fundamentals Professional Certification (SFPC), DSS, 2011 & 2015

Department of Navy Meritorious Civilian Service Award, ONI, 05/2004

Department of Army Superior Civilian Service Award, USASOC, 09/24/1999

Department of Army Commander's Award for Civilian Service, USASOC, 04/25/1995

Department of Army Achievement Medal for Civilian Service, USASOC, 4/08/1993

Richard L. Plummer
13604 NW 44th CT
Vancouver, WA 98685-1529
Email: richplummer6@gmail.com

**Work
Experience:**

DIA/HQ, U.S. European Command (USEUCOM)

Unit 30400

ATTN: ECJ2

APO, AE 09131 United States

08/2008 – 10/2015

Supervisory Security Specialist, GG-0080-15

Duties, Accomplishments and Related Skills:

Serves as Chief, Security Support Division, Intelligence Directorate, Headquarters, U.S. European Command (USEUCOM), a regional combatant command (COCOM). Exercises management and direction of three subordinate branches providing personnel, physical, industrial, and information security, as well as SETA and NATO Sub-Registry support to a joint command with a fifty-one country area of responsibility. Supervises a 16-person staff comprised of multi-service military personnel (active/reserve), DOD civilians, contractors performing security functions in direct support to HQ, USEUCOM, and over fifty geographically dispersed elements of the command; as well as agencies and activities attached to or supporting the headquarters. Performs duties as the Chief Security Official and senior DOD Special Security Officer (SSO) within the European Theater providing oversight of over 300 SCI and/or collateral accredited facilities in ten countries. Serves as the Intelligence Directorate initial denial authority for the Freedom of Information Act (FOIA), stakeholder member of the Insider Threat Working Group and designated the USEUCOM Intelligence Oversight Officer. Works closely with Command's Operation Security (OPSEC), Counter Intelligence (CI), and Critical Infrastructure Protection (CIP) staffs to assess vulnerabilities, determine potential impact on military operations and recommend solutions. Responsible for the development of the command's security policies and directives; executes quarterly security manager training courses; oversees the development of cost effective mitigation strategies to correct security shortfalls, and manages investigation of security incidents. Provides security guidance/oversight to the planning, construction and/or modification, and accreditation of SCIFs and collateral secure working areas for the command; provides direct security liaison with the Army Corp of Engineers on major projects. Coordinates security issues with DOD agencies, clearance adjudication facilities, USEUCOM components, other COCOMs, DIA, and OUSD(I).

Position management transferred from Department of the Army to the Defense Intelligence Agency (DIA) in October 2008; remained assigned to USEUCOM after transition. USAFRICOM was deemed Full Operational Capability (FOC) on 1 Oct 2008; however, the Security Support Division continued various levels of security support to the two AFRICOM Security Offices after FOC and through the end of Feb 2009.

12 Dec 2018

To whom This may concern,

I am writing on behalf of my friend, Dorie Adams. He is requesting that your company not install a "Smart Meter" at his home & allow him to have his electric usage measured with his current type of meter. I realize that while many states have provisions for customers to opt out of using smart meters, current Pa. law has no such provision, yet.

However, many people, my friend included, have serious reservations about the smart meters. It would seem an easy solution would be to simply allow those people to continue using their old meters & provide you with a reading each month, as many people have been doing for years.

Many believe the new meters pose a serious health risk from R.F. Radiation as well as becoming a possible portal for hackers to access their home. Should health or security issues arise after you've installed the new meters, it would seem to open your company to a host of legal issues & liability. These would only be compounded by the "Take the smart meter or do without electricity" stance that you are forcing on your customers.

If a customer already has health or security issues & you force the device on them, you would need to accept the ~~the~~ liability for exacerbating their problems. Should it go to court, it would be difficult to find a jury sympathetic to your company. Most would agree that this matter should not come down to use the device or do without electricity.

I would argue that most people would agree that a better option would be to allow those customers with issues to continue using their original meters.

I hope that you will consider your customers well being & peace of mind before accumulating untold hours in lawyers fees & court time, not to mention the bad publicity this ultimatum would garner.

If you have any questions, feel free to contact me at any time,

Sincerely,
Francis M. Anderson
Francis M. Anderson
115 Renner's Run Rd
Mt. Morris Pa
15349

724-324-2160

To whom,

I support Dorie Adams in his **rejection** of the installation of the smart meter being forced to place this device on the outside of his home and then threaten to have his service terminated for non compliance is unacceptable ..

1. I Reuben Adams Having worked in the field and installations of Tele Commutation equipment for 7 yrs and Technical training in basic Electrical for Residential Commercial and Industrial completely understanding the wattage use of every appliance with each appliance having separate wattage use..These now can all be monitored by the new meters ,It can also be use in as much detail as to which appliance you use in most times of the day also detailing which areas of your home you most frequent and times of day or night basically turning you home in to a hard wire monitor being sent by air wave signals with capability of sending and receiving .

2.This is a clear and present privacy issues ,Not knowing who or what intended use collecting of that information is being use for .

The manor in which also these meters are also being placed on the home also raises question for health issue such as not notify occupants of the day or time of actual installation and clearly stating the capability of this type of meter which could have a effect such as on pacemaker and other home care with medical devises.

I Reuben Adams **REJECT** the use of such devices as WWP cannot guarantee that data and in use of this device is not collecting such and it is a clear invasion of my personal privacy .

One meter was placed on my home/property with no notification of time and date completely unaware of that installation demand to have that meter removed and a more safer device be placed back on my home .

Date : 1/8/19

By : Reuben Adams

CERTIFICATE OF COMPLIANCE

I certify that this filing complies with the provisions of the *Public Access Policy of the Unified Judicial System of Pennsylvania: Case Records of the Appellate and Trial Courts* that require filing confidential information and documents differently than non-confidential information and documents.

Submitted by: Dorie Adams
Signature: Mr Dorie Adams
Name: DORIE ADAMS
Attorney No. (if applicable): _____

Pennsylvania Public Utility Commission

Secretary. Rosemary Chiavetta
Pennsylvania Public Utility Commission
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Dorie Adams

VS

West Penn Power

Docket No. C-2018-3002271

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing response Jan. 4th deadline ,was served on the individuals named below by depositing the same within the custody of the United States Postal Service, First Class mail, postage prepaid, addressed to:

Date: 1/9/19

By: Ms Dorie Adams