

Tori L. Giesler, Esq.  
(610) 921-6658  
(330) 315-9263 (Fax)

February 13, 2019

**VIA ELECTRONIC FILING**

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

**Re: Heidi Fiedler v. Metropolitan Edison Company**  
**Docket No. C-2018-3003642**

Dear Secretary Chiavetta:

Enclosed please find the Motion to Dismiss of Metropolitan Edison Company with regard to the above-captioned matter. This document has been served on the Complainant as shown in the Certificate of Service.

Please contact me if you have any questions regarding this matter.

Very truly yours,



Tori L. Giesler

krak  
Enclosures

c: As Per Certificate of Service

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**HEIDI FIEDLER**

**V.**

**METROPOLITAN EDISON COMPANY**

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**Docket No. C-2018-3003642**

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**NOTICE TO PLEAD**

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TO: Heidi Fiedler

Pursuant to 52 Pa. Code § 5.371(b), you are hereby notified that, if you do not file a written response denying or correcting the enclosed Motion to Dismiss of Metropolitan Edison Company within **five (5) days** from the service of the Notice, the facts set forth by Metropolitan Edison Company in the Motion may be deemed to be true, thereby requiring no other proof. All pleadings, such as a Reply to Motion, must be filed with the Secretary of the Pennsylvania Public Utility Commission, with a copy service to counsel for Metropolitan Edison Company, and where applicable, the Administrative Law Judge presiding over the case.

File with:

Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
P.O. Box 3265  
Harrisburg, PA 17105-3265

With a copy to:

Administrative Law Judge Jeffrey A. Watson  
Pennsylvania Public Utility Commission  
Office of Administrative Law Judge  
Piatt Place, Suite 220  
301 5th Avenue  
Pittsburgh, PA 15222

Lauren M. Lepkoski  
Tori L. Giesler  
Pennsylvania Electric Company  
2800 Pottsville Pike  
P.O. Box 16001  
Reading, Pennsylvania 19612-6001

Date: February 13, 2019



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Lauren M. Lepkoski, Esquire  
Tori L. Giesler, Esquire

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**HEIDI FIEDLER**

**V.**

**METROPOLITAN EDISON COMPANY**

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**Docket No. C-2018-3003642**

**MOTION OF METROPOLITAN EDISON COMPANY TO DISMISS COMPLAINT OF  
HEIDI FIEDLER FOR FAILURE TO COMPLY WITH ORDERS**

TO THE PENNSYLVANIA PUBLIC UTILITY COMMISSION:

Metropolitan Edison Company (“Metropolitan Edison” or the “Company”) by and through its attorneys, Lauren M. Lepkoski and Tori L. Giesler, and pursuant to 52 Pa. Code §§ 5.245, 5.371-5.372, hereby files this Motion to Dismiss the complaint of Heidi Fiedler (“Complainant”) for her failure to comply with Administrative Law Judge (“ALJ”) Jeffrey A. Watson’s Orders issued September 21, 2018 and January 7, 2019. In support thereof, the Company avers as follows:

**I. BACKGROUND**

1. On July 23, 2018, the Complainant filed a Formal Complaint with the Pennsylvania Public Utility Commission (“Commission”) regarding 432 East Wesner Road, Blandon, Pennsylvania 19510 (“Service Location”).

2. On August 13, 2018, the Company filed its Answer and New Matter denying the material allegations. On the same day, the Company also filed Preliminary Objections to the Formal Complaint.

3. On September 11, 2018, a Motion Judge Assignment Notice was issued and Administrative Law Judge (“ALJ”) Jeffrey A. Watson was assigned as the Presiding Officer in the above-captioned proceeding.

4. On September 21, 2018, ALJ Watson issued an Interim Order, which denied the Company's Preliminary Objections.

5. On September 21, 2018, an Interim Order Establishing Initial Litigation Schedule was issued which set forth the schedule for discovery, the identification of witnesses, and filing of motions in this proceeding. Relevant to this Motion, ALJ Watson issued a witness notification deadline of December 28, 2018 and a discovery deadline of February 1, 2019.

6. On October 25, 2018, in accordance with 52 Pa. Code § 5.341, the Company issued to the Complainant interrogatories and document requests ("Discovery Requests") via first class mail. In its Discovery Requests, the Company sought information and documents related to the Complainant's allegations regarding the Company's smart meters.

7. A full copy of the Company's Discovery Requests is attached as Exhibit A.

8. On November 5, 2018, Complainant submitted a filing amending her original complaint and objecting to all of the Company's Discovery Requests. The Complainant objected to providing any discovery responses at this time on the grounds that "[i]t is not possible to provide detailed information and comprehensive answers to the questions, and to provide documents be used in this case, without knowing the precise manufacturer and model of the smart meter system . . . that MetEd and FirstEnergy seek to install at my home." The amendments to the original complaint that were contemporaneously filed with Complainant's objections generally requested information regarding the Company's smart meters, sought to add FirstEnergy Corp. as a respondent in this proceeding, and made additional requests for relief. A copy of the Complainant's November 5, 2018 filing is attached as Exhibit B.

9. At no point did the Complainant contact the Company to discuss the Discovery Requests or to seek an extension of time to respond to the Discovery Requests.

10. On November 13, 2018, in response to the Complainant's objections, the Company filed with the Commission a Motion to Compel Responses to Interrogatories and Document Requests.

11. On November 27, 2018, the Company filed its Answer and New Matter to the Amended Complaint.

12. On November 27, 2018, the Complainant filed an Opposition to the Motion to Compel Responses to Interrogatories and Production of Documents.

13. On December 28, 2018, in accordance with the Interim Order Establishing a Litigation Schedule, the Company provided notice and summaries of testimony for its factual and expert witnesses.

14. On January 7, 2019, an Interim Order Granting Respondent's Motion to Compel the Complainant to provide responses to the Discovery Requests propounded by the Company was issued. The Order denied the Complainant's opposition to the Motion to Compel and objections to the Discovery Requests and directed the Complainant to serve upon the Company full and complete responses to all of the Discovery Requests no later than February 1, 2019.

15. By letter directed to the Commission and dated February 1, 2019, the Complainant stated that she had not received a ruling from the Commission on her Amended Complaint and requested a six-month extension of time for the "discovery process."

16. By letter directed to Counsel for the Company and dated February 1, 2019, the Complainant provided incomplete responses.

17. The Complainant also untimely objected to Questions 1f, 1g, 1j, 27, 29, and 33, even though the Complainant's objections and opposition to the Discovery Requests had already been denied by ALJ Watson via Interim Order entered January 7, 2019.

18. Additionally, the Complainant failed to provide any documentation in response to the Discovery Requests providing incomplete responses such as "the production of documents is ongoing and will be provided once it's complete," "documents to be presented at the hearing has not been determined yet" and that she needs "more time to acquire documentation" – all despite the fact that the Complainant filed the Formal Complaint on July 23, 2018 and has had the Discovery Requests since October 25, 2018.

19. Further, the Complainant stated that "no witnesses have been retained at this time" even though the Complainant's list of proposed witnesses was to be provided no later than December 28, 2018 in accordance with the Interim Order issued September 21, 2018.

20. At no point did the Complainant contact the Company to discuss the Discovery Requests and, to date, the Complainant has failed to provide *complete* responses to the Discovery Requests as directed by ALJ Watson in the Interim Order issued on January 7, 2019.

21. Further, the Complainant has ignored ALJ Watson's Interim Order Establishing Litigation Schedule issued on September 21, 2018, requiring the exchange expert and factual witness information by December 28, 2018, as no witness information has been received from the Complainant as of the filing of this Motion, and that the Parties were to conclude all discovery by February 1, 2019.

## **II. MOTION TO DISMISS**

22. The Commission's regulations permit the discovery of "any matter, not privileged, which is relevant to the subject matter involved in the pending action." 52 Pa. Code § 5.321(c).

23. Generally speaking, this Commission applies a standard of relevance which is less restrictive than that required by parties to present information into the evidentiary record. It is not grounds for objection that the information sought will be inadmissible at hearing if the information sought appears reasonably calculated to lead to the discovery of admissible evidence. 52 Pa. Code § 5.321(c).

24. Discovery may be obtained regarding any matter relevant to the subject matter. Relevant evidence is evidence that tends to make an act at issue more or less probable. Moreover, evidence is relevant if it advances the inquiry in some degree and, thus, has probative value. Although the law does not furnish an absolute test of relevancy, the Pennsylvania Supreme Court follows a two-part analysis for determining relevance. In *Commonwealth v. Stewart*, 461 Pa. 274, 336 A.2d 282 (1975), the Court held that “[i]t must be determined first if the inference sought to be raised by the evidence bears upon a matter at issue in this case and, second, whether the evidence renders the desired inference more probable than it would be without the evidence. *Id.* at 284.

25. The information sought here by the Company is relatively simple and straightforward. It is directly relevant and material to the issues raised by the Complainant. The Company is entitled to the requested information to enable it to fully investigate and defend against the Complainant’s allegations.

26. The Commission’s regulations at 52 Pa. Code § 5.371 address the consequences of a participant’s failure to comply with the Commission’s discovery regulations and provides that the Commission or the presiding officer may, on motion, make an appropriate order if a party fails to appear, answer, file sufficient answers, file objections, make a designation or otherwise respond to discovery requests.

27. Further, 52 Pa. Code § 5.372 provides that the presiding officer may impose appropriate sanctions upon a party found to be found in violation of the obligations set forth in the Commission's regulations.

28. The Complainant has failed to provide any responses to the Company's Discovery Requests and failed to provide notification of any potential witnesses in contradiction to the Interim Order issued by ALJ Watson.

29. The Complainant's actions demonstrate a lack of cooperation and willingness to participate in this proceeding as required under the Commission's regulations. As a result, the Formal Complaint in this proceeding should be dismissed in its entirety.

WHEREFORE, Metropolitan Edison Company respectfully requests that the Commission dismiss, with prejudice, the Complaint of Heidi Fiedler.

Respectfully submitted,

Dated: February 13, 2019



Lauren M. Lepkoski  
Attorney No. 94800  
Tori L. Giesler  
Attorney No. 207742  
FirstEnergy Service Company  
2800 Pottsville Pike  
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(610) 921-6658  
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tgiesler@firstenergycorp.com

Counsel for Metropolitan Edison Company



2800 Pottsville Pike  
PO Box 16001  
Reading, PA 19612-6001

Lauren M. Lepkoski, Esq.  
(610) 921-6203  
(330) 315-9263 (Fax)

October 25, 2018

**VIA FIRST CLASS MAIL**


Heidi Fiedler  
432 East Wesner Road  
Blandon, PA 19510

**Re: Heidi Fiedler v. Metropolitan Edison Company**  
**Docket No. C-2018-3003642**

Dear Ms. Fiedler:

Enclosed please find the Interrogatories and Requests for Production of Documents (Set I) to Metropolitan Edison Company. Pursuant to 52 Pa. Code §§ 5.341 and 5.349, *et seq.*, your answers are due within twenty days of service of this letter (November 14, 2018). In addition, any objections are due within ten days of service of this letter (November 4, 2018). This document has been served as indicated within the Certificate of Service.

Very truly yours,

  
Lauren M. Lepkoski

Enclosures

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

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**HEIDI FIEDLER** :  
 :  
 v. : **Docket No. C-2018-3003642**  
 :  
**METROPOLITAN EDISON COMPANY** :  
 :

**INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS OF  
METROPOLITAN EDISON COMPANY TO HEIDI FIEDLER, SET I**

Metropolitan Edison Company hereby propounds these Interrogatories and Requests for Production of Documents (Set I) to Heidi Fiedler (the “Complainant”). 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 (November 14, 2018) and objections within 10 days (November 4, 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 and send a copy to Administrative Law Judge Jeffrey A. Watson. If you have any objection to any of the interrogatories or the request 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: October 25, 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 “Complainant” and “you” refer to Heidi Fiedler and her attorneys, agents, or representatives.

F. As used herein, the terms “Company” or “Respondent” refer to 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-2018-3003642.

H. As used herein, the terms “service location,” “property,” or “home” refer to your service address of 432 East Wesner Road, Blandon, Pennsylvania 19510.

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” includes 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 HEIDI  
FIEDLER, SET I**

1. Are you claiming that the installation of a smart meter at your property would cause or contribute to an adverse health condition for any member of your household?
2. If the answer to question 1 is yes, please provide the following information for each household member whose health you claim will be affected:
  - a. Name;
  - b. Age;
  - c. The specific health condition that you believe would be caused by or contributed to as a result of the smart meter being installed;
  - d. Whether the household member is already experiencing the specific health condition and, if so, the date on which the condition was first experienced and the date on which the condition was first diagnosed by a medical doctor;
  - e. Whether the household member has experienced the specific health condition within the last four years;
  - f. Any medication prescribed to the household member; and
  - g. Whether the household member has visited a medical professional for the specific health condition, and if so, the name, address, and phone number of the medical professional and the date of the visit(s) to the medical professional.



- 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.
8. Are there any cordless phones used in your home?
- a. For each cordless phone in your home, please provide the name of the phone manufacturer and the model.
9. Do you use a cellular phone?
- a. If yes, please provide the names of the cell phone manufacturer and model (for example, Apple i-Phone 7S).
  - b. Does anyone else in your home use a cellular phone?
  - c. How many cellular phones are in use at your home?
  - d. For each cellular phone used by a member of your household, please provide the name of the cell phone manufacturer and the phone model.

10. Is there satellite television at your home?
  - a. If yes, please provide the name of the satellite television provider (for example, Direct TV).
  - b. If yes, where is your satellite disk located?
11. Is there a laptop computer at the service location?
  - a. If yes, where is it located?
12. Do you have a wifi network in your home?
  - a. If so, where is your wifi router located?
13. In your complaint, you state that you believe the Company is in violation of Act 129. Please provide the following information related to this statement?
  - a. Is it your position that a customer has the right to request a smart meter not be installed at her service location?
  - b. Is it your position that a customer must request smart meter installation?
  - c. Is it your position that Act 129 of 2008 does not require the utility to install smart meters throughout its service territory?
14. Is it your position that you would like to opt out completely from smart meter installation?

15. Do you believe the installation of a smart meter at your property would violate the privacy or security of a member of your household?
16. If yes to question 15, please specifically describe each of your concerns regarding your household's privacy or security after the installation of a smart meter.
17. Please provide the following information regarding your position that the installation of a smart meter would violate your household's privacy or security:
  - 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.
18. To your knowledge, has a smart meter been installed by the Company at your property?
19. Please describe in detail how you believe a smart meter operates.

20. In your complaint, you state that you are “aware of serious security and hacking issues with smart meters.” Please provide the following information related to this statement:
- a. What documents do you rely on in support of this statement?
  - b. Do you intend to rely on these documents at the time of the hearing in this proceeding?
  - c. Please describe in detail the information you have to support this statement.
21. Please list the specific issues you intend to raise at the hearing in this proceeding.
22. Please identify the legal support, including specific citations, for each issue identified in question 21.
23. Please list the factual support for each issue identified in question 21.
24. 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 address and telephone number 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.
25. Would any witness identified in question 24 be offered as an expert?
- a. If yes, provide the curriculum vitae of the witness and a summary of the testimony the expert witness is expected to provide.
26. 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.
27. 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 HEIDI FIEDLER, SET I**

28. Please provide copies of all documentation supporting your position that the installation of a smart meter at your home would cause or contribute to an adverse health condition in any member of your household.
29. Please provide copies of all documentation associated with visits by members of your household to a medical professional related to the health conditions identified in question 2, including but not limited to any and all medical records, medical visit reports, and notes and letters from medical doctors or other health care professionals.
30. Please provide copies of all documentation you intend to refer to at the hearing in this proceeding related to smart meters and/or radio frequency fields and health.
31. Please provide copies of all documentation supporting your position that smart meters would create safety issues for you or members of your household.
32. Please provide copies of all documentation you intend to refer to at the hearing in this proceeding related to the safety concerns of smart meters.
33. For each cellular telephone used by a member of your household, please provide a complete copy of the bills you received from your cellular telephone provider for the past 12 months.

34. Please provide copies of all documentation supporting your position that smart meters would violate the privacy or security of your household.
35. Please provide copies of all documentation you intend to refer to at the hearing in this proceeding supporting your position that smart meters would violate the privacy or security of your household.
36. Please provide copies of all documentation supporting your position that your household may opt out of smart meter installation.
37. Please provide copies of all documentation you intend to refer to at the hearing in this proceeding supporting your position that a household may opt out of smart meter installation.
38. Please provide a copy of all proposed exhibits you intend to submit for the hearing in this proceeding.
39. Please provide copies of all documentation you are relying upon in support of your positions in this proceeding.
40. Please provide copies of all documentation you referenced, referred to, or otherwise relied upon in preparing your responses to these discovery requests.

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**HEIDI FIEDLER**

v.

**METROPOLITAN EDISON COMPANY**

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**Docket No. C-2018-3003642**

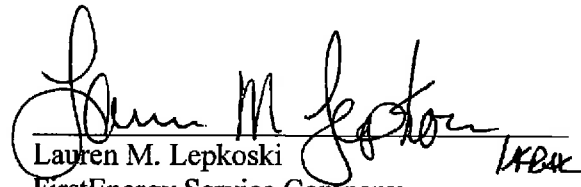
**CERTIFICATE OF SERVICE**

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 Heidi Fiedler 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:

Heidi Fiedler  
432 East Wesner Road  
Blandon, PA 19510

Dated: October 25, 2018

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

November 5, 2018

ROSEMARY CHIAVETTA  
SECRETARY  
PENNSYLVANIA PUBLIC UTILITY COMMISSION  
400 NORTH STREET 2<sup>ND</sup> FLOOR  
HARRISBURG, PA 17120

**Heidi Fiedler v. Metropolitan Edison Company**  
**Docket No. C-2018-3003642**

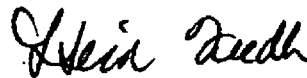
Dear Ms. Chiavetta:

Please find enclosed my Amended Formal Complaint and my Objections to Interrogatories and Production of Documents. I have acquired new critical information that was not in the original complaint and am requesting additional relief from the Respondent.

I am also serving copies to the Honorable Lauren Lepkoski of First Energy Services Company.

Thank you for your attention to this matter.

Very truly yours,



Heidi Fiedler

RECEIVED

NOV - 5 2018

PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

Enclosures

cc: The Honorable Jeffrey Watson, Public Utility Commission  
The Honorable Lauren Lepkoski, First Energy Services Company

BEFORE THE PENNSYLVANIA PUBLIC UTILITIES COMMISSION

Heidi Fiedler

v.

Docket No. C-2018-3003642

Metropolitan Edison Company

**RECEIVED**

NOV - 5 2018

**FIRST AMENDED COMPLAINT**

PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

In addition to my original Complaint, I submit the following information to amend my Formal Complaint No. C-2018-3003642 filed with the Public Utility Commission. It is my belief that it is critical for Metropolitan Edison Company (Met Ed) to provide comprehensive information about the entire smart meter system that is being deployed in the Met Ed service area. There appears to be many makes and models of smart meters in existence, with each manufacturer having unique operating systems. 66 PA CS Section 1501, Character of services and facilities, states "Every public utility shall furnish and maintain adequate, efficient, safe and reasonable service and facilities." In order to research Met Ed's compliance with section 1501, one must have all of the precise smart meter-related information on Met Ed's smart meter systems. In order to proceed with my case, Met Ed should provide the smart meter system information that is referenced in my Complaint.

Further, it is my understanding that First Energy Corporation (First Energy), a registered public utility holding company headquartered in Akron, Ohio, is responsible for the smart meter deployment in Pennsylvania through its offices in Reading, PA. As the holding company, First Energy appears to make all of the financial and operating decisions for its wholly owned subsidiary company, Met Ed. It further appears that First Energy is responsible for Met Ed's compliance with 66 PA CS Section 1501, Character of services and facilities. Further, Met Ed is represented by Lauren Lepkoski, an attorney working for First Energy Service Company. First Energy Corporation should be included as a Respondent in this case.

**Additional Requested Relief**

6. Compel Met Ed/First Energy to provide comprehensive smart meter system information on Met Ed's current smart meter deployment in Pennsylvania, including all manufacturer information, model number, independent testing laboratory reports on all safety information, including the EMF and EMR emitted by the smart meters, controllers and all related equipment. Also compel Met Ed to include detailed information on how the smart system operates, including how it sends and receives information on the smart meter grid and how it communicates with ALL other electronic devices, either within or outside customers' homes.
7. Compel Met Ed to furnish all national safety and environmental certifications of its smart meter system equipment
8. Order First Energy Corporation as an additional Respondent in my Complaint.

**BEFORE THE PENNSYLVANIA PUBLIC UTILITIES COMMISSION**

**Heidi Fiedler**

vi.

**Docket No. C-2018-3003642**

**Metropolitan Edison Company**

**OBJECTIONS TO INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS**

**With the filing of the Amended Complaint, I submit a blanket objection to the completion of the entire Met Ed Interrogatories and Request for production of documents dated October 25, 2018. It is not possible to provide detailed and comprehensive answers to the questions, and provide documents to be used in this case, without knowing the precise manufacturer and model of the smart meter system, (and all of the other the information that I seek in the Amended Complaint,) that Met Ed and First Energy seek to install at my home.**

**RECEIVED**

**NOV 5 2018**

**PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU**

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**Heidi Fiedler**

**v.**

**Metropolitan Edison Company**

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**C-2018-3003642**

**CERTIFICATE OF SERVICE**

I hereby certify that I have this day served a true and correct copy of an amended Formal Complaint and Objections to Interrogatories and Production of Documents for Docket No. C-2018-3003642 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:

Honorable Lauren Lepkoski

First Energy Services Company  
2800 Pottsville Pike  
PO Box 16001  
Reading, PA 19612

Dated: November 5, 2018

**RECEIVED**

NOV - 5 2018

PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU



Heidi Fiedler  
432 E. Wesner Rd  
Blandon, PA 19510

CERTIFIED MAIL



7015 1520 0002 6204 6836

Ms Heidi Fiedler  
Blandon PA  
432 E Wesner Rd  
Blandon, PA 19510

Exhibit B

Page 5 of 5

U.S. POSTAGE PAID  
PSN LG 5147  
BLANDON, PA  
19510  
NOV 09, 18  
AMOUNT

\$7.41

R2305K141093-22



1000



17120

MS. ROSEMARY CHIAVETTA  
PUBHC UTILITY COMM.  
400 NORTH ST.  
HARRISBURG, PA 17120



**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**HEIDI FIEDLER**

**V.**

**METROPOLITAN EDISON COMPANY**

:  
:  
:  
:  
:

**Docket No. C-2018-3003642**

**CERTIFICATE OF SERVICE**

I hereby certify that I have this day served a true copy of the Motion to Dismiss of Metropolitan Edison Company 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:

Heidi Fiedler  
432 East Wesner Road  
Blandon, PA 19510

Administrative Law Judge Jeffrey A. Watson  
Pennsylvania Public Utility Commission  
Office of Administrative Law Judge  
Piatt Place, Suite 220  
301 5th Avenue  
Pittsburgh, PA 15222

Dated: February 13, 2019



Lauren M. Lepkoski  
Tori L. Giesler  
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