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February 20, 2019

VIA ELECTRONIC FILING

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

Re: V. Wes Zimmerman v. Metropolitan Edison Company
Docket No. C-2019-3007568

Dear Secretary Chiavetta:

Attached please find the Preliminary Objections of Metropolitan Edison Company in the above-referenced matter. This document has been served on the Complainant as shown in the Certificate of Service.

Please contact me if you have any questions.

Very truly yours,

Tori L. Giesler / KBW

Tori L. Giesler

krak
Enclosures

c: As per Certificate of Service

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

V. WES ZIMMERMAN

v.

METROPOLITAN EDISON COMPANY

:
:
:
:
:

Docket No. C-2019-3007568

NOTICE TO PLEAD

TO: V. Wes Zimmerman

Pursuant to 52 Pa. Code § 5.101 you are hereby notified that if you do not file a reply to the enclosed Preliminary Objections of Metropolitan Edison Company within ten (10) days from service of this notice, the facts set forth by Metropolitan Edison Company in the Preliminary Objections may be deemed to be admitted, thereby requiring no other proof. All pleadings, such as a Reply to Objection, 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.

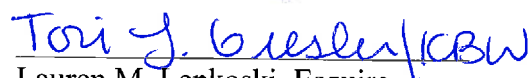
File with:

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

With a copy to:

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

Date: February 20, 2019


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

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

V. WES ZIMMERMAN :
 :
 v. : **Docket No. C-2019-3007568**
 :
METROPOLITAN EDISON COMPANY :

**PRELIMINARY OBJECTION TO THE FORMAL COMPLAINT OF
V. WES ZIMMERMAN**

TO THE PENNSYLVANIA PUBLIC UTILITY COMMISSION:

AND NOW, Metropolitan Edison Company ("Met-Ed" or the "Company"), by and through its counsel, Lauren M. Lepkoski and Tori L. Giesler, files this Preliminary Objection pursuant to Section 5.101(a) of Pennsylvania Public Utility Commission ("Commission") regulations, 52 Pa. Code § 5.101(a)(1), and in support thereof, avers as follows:

I. Introduction

1. In his recently filed Formal Complaint, V. Wes Zimmerman ("Complainant") who resides at 69 Goat Hill Road, Boyertown, Pennsylvania 19512 ("Service Location") alleges that he does not want a smart meter installed at the Service Location. (Attachment to Formal Complaint.) The Complainant states as requested relief:

I am writing you with a formal complaint about the upcoming installation of a smart meter on our home at 69 Goat Hill Road, Boyertown, PA 19512 (Met-Ed account number 100061499495) and the neighboring property we own at 78 Goat Hill Road, Boyertown, PA 19512 (separate account in the name of our tenant). I am kindly requesting that installation of a smart meter on both homes be deferred at this time for the following reasons:

1) The PA Public Utilities commission, based on its interpretation of Act 129 of 2008, does not require smart meters until 2023. That being the case, I would like installation deferred until then, and preferably, indefinitely – for the following reasons.

2) The primary reason we do not want a Smart Meter is because we have very serious health related concerns. Smart Meters never turn off. They are transmitting microwave radio frequency several times per minute. These frequencies are the same used in wireless communications/cell

phones and wireless internet (wifi). The World Health Organization has classified these frequencies as Class 2B carcinogens – the same category as lead and a host of other chemicals. There is no consideration given to where these meters are installed in proximity to bedrooms or parts of a home where people spend significant amounts of time. This is unacceptable and eliminates people being able to control their exposure to these frequencies in their own homes. Forcing smart meters on people's homes is similar to putting lead in water and forcing people to drink it. No one has the right to force these types of exposures on people, especially when one is actively looking to control, reduce, or eliminate such exposures. We do not have wifi in our home, and have elected to live in more of a rural setting not in close proximity to other homes where wifi might be used. We have elected to do this, in part, to control and reduce our exposure to these harmful frequencies.

We have young children in our household, and our meter is near a bedroom. Exposing our children to these frequencies in close proximity at their age several times per minute while they sleep (when the body should be recovering) could be extremely detrimental to their health and impact them as young adults. We, and we alone, have the right to make this health related decision for ourselves and our children.

3) I have email communication from Met-Ed assuring me that the electric box blocks "most" of the microwave radio frequency. This statement is a de facto admission by Met-Ed that radio frequencies are harmful, yet Met-Ed continues sending mailers out trying to convince its customers that the meters are safe. The meters are not safe, otherwise Met-Ed would not be trying to convince its customers of their safety and would not make de facto admissions to their customers of the meters' harmful radio frequency emissions. Therefore, Met-Ed was not truthful.

4) Perhaps most importantly, Act 129 of 2008 DOES NOT REQUIRE installation of smart meters on homes. From my research, it appears that the recently retired Rep. Godshall took it upon himself to declare that the law mandates installation of smart meters. The plain language of the law shows the opposite. Mr. Godshall's insistence that installation is mandated could be related to his son's position with PECO. On the surface, this is an apparent conflict of interest with other potential implications. The PA PUC appears to have been acting at the misplaced guidance of Rep. Godshall or, with all due respect, has misinterpreted the plain language of the law.

5) Paragraph 2 of sub-section f of Act 129 of 2008 states that smart meters shall be furnished as follows:

- i. Upon request from a customer that agrees to pay the cost of the smart meter at the time of the request.
- ii. In new building construction.
- iii. In accordance with a depreciation schedule not to exceed 15 years.

The above language of the law does not mandate smart meters unless a customer requests it and agrees to pay for it at the time of that request and

in new building construction (after the implementation of the Act). We (our home) do not fit in either of those categories. Subparagraph iii mandates that the useful life (aka depreciation) of the smart meters not exceed 15 years. Subparagraph iii does not mean, in any way, that smart meters are required. Later in the Act it states that sub-section (f) does not apply to electric distribution companies with 100,000 or fewer customers. This does not mean that customers of all electric distribution companies with 100,001 or more customers must accept a smart meter; rather it means that subparagraphs i, ii, and iii above do not apply to electric distribution companies with 100,000 or fewer customers, and those subparagraphs do not mandate smart-meters. It is clear that the language of the law DOES NOT require a smart-meter in our situation. Aside – we do believe that even those with new construction should have a choice.

6) It is simple for nearly all utility customers to self-report analog meter readings on a monthly basis. Smart Meters being required for purposes of remote reading is simply not a valid reason to force them on customers. Nor should there be costs forced on a customer to keep their analog meter that currently don't exist. This is extortion - forcing people to pay to protect their health in the face of known biological harm required by the PA PUC and utility companies – opening the door for tremendous liability.

Thank you in advance for your consideration. Although I do not believe clarifying legislation or an opt-out is necessary based on the plain language of the Act, I hope our legislature will act swiftly to correct this situation for all Pennsylvanians now that Mr. Godshall has retired and should no longer be squashing every attempt at clarifying legislation because of his apparent personal conflict of interest.

Additionally, understand that if we are forced to accept a smart meter on our home(s), it will only be under duress because of threats to turn off our power, putting my family in danger in other ways.

(Attachment to Formal Complaint.)

2. The Company is in the process of deploying smart meters in its service territory in accordance with Act 129 of 2008 (“Act 129”).¹

3. On August 14, 2017, the Complainant contacted the Company via email wherein he states, *inter alia*, that he is refusing installation of a smart meter at the Service Location, that Act 129 is an “opt-in” and he does not choose to “opt-in.” The Company provided a response via

¹ 66 Pa.C.S. § 2806.1 *et seq.* Among other things, Act 129 specifically directed that electric distribution companies with at least 100,000 customers file a smart meter technology procurement and installation plan with the Commission for approval. 66 Pa.C.S. § 2807(f)(1) and (2).

email to the Complainant advising that the Company is required to install a smart meter at the Service Location pursuant to Act 129. Further, the Company's response attempted to address the Complainant's concerns regarding the smart meter and directing the Complainant to additional resources found on the Company's website. On August 17, 2017, the Complainant sent an email to Company inquiring about the availability of a "wired" smart meter. The Company promptly responded to the Complainant via email that a "wired" smart meter was not an option. On August 18, 2017, the Complainant sent an additional email to Company reiterating his refusal of installation of the smart meter at the Service Location for health reasons. The Company responded and attempted to address the Complainant's concerns to no avail. On December 4, 2017, the Company mailed additional fact sheets regarding the smart meter to the Complainant in an effort to address the Complainant's concerns.

On December 27, 2018, the Complainant contacted the Company stating that he did not want the meter changed at the Service Location until 2023. The Complainant was advised that the Company is unable to delay installation until 2023. The Company representative also advised that continued refusal to permit access to the Company's meter could result in disconnection of service. On December 28, 2018, the Company issued a letter to the Complainant stating that he should contact the Company to facilitate installation of a smart meter at the Service Location. That same day, the Complainant again emailed the Company reiterating his refusal to have a smart meter installed at the Service Location as well as another property he owns located at 78 Goat Hill Road, Boyertown, Pennsylvania 19512, stating that the Commission has misinterpreted Act 129 and that installation of a smart meter at the Service Location is not mandated. Further, the Complainant requested that if he cannot refuse installation, he would like to delay installation until 2023. The

Company responded via email confirming that the Complainant spoke with a Company representative the prior day regarding his refusal of smart meter installation.

On January 3, 2019, the Complainant contacted the Company regarding the correspondence issued on December 28, 2018. He reiterated his refusal of the installation of a smart meter at the Service Location and advising the Company representative that the Company “better not step foot on his property.” The Company representative advised the Complainant that the Company has the right to access its equipment and that refusal to permit access would result in disconnection of service. The Complainant advised he would be filing a complaint with the Commission. The Complainant requested to speak with the “CEO.” The Company representative advised that she was unable to transfer his call to the “CEO” but could transfer him to a supervisor. The Complainant accepted and was then transferred to a supervisor. The supervisor reiterated the Company’s position that it was attempted to install a smart meter at the Service Location in accordance with Act 129. The Complainant continued to state that the Commission had misinterpreted Act 129. The supervisor provided the Complainant with contact information for the Commission. On January 29, 2019, the Company received a letter from the Complainant in which he reiterated his refusal of the installation of a smart meter at the Service Location. On January 30, 2019, the Complainant filed the Formal Complaint with the Commission. On January 31, 2019, the Formal Complaint was electronically served on the Company.

4. As explained in greater detail below, even if all of the facts in the Formal Complaint are accepted as true, they do not constitute a violation of any law which the Commission has jurisdiction to administer, or of any regulation or order of the Commission, such that relief can be granted.²

² See 66 Pa.C.S. § 701.

5. As a result, the Company requests that this Preliminary Objection be granted and that the Commission: (1) strike the Complainant's request for an exemption from the installation of a smart meter; (2) dismiss the Formal Complaint in its entirety with prejudice; and (3) grant the Company such other relief as may be just and reasonable under the circumstances.

II. Background

6. Met-Ed is an electric distribution company that is certificated as a public utility in Pennsylvania.

7. On August 14, 2017, the Complainant contacted the Company via email wherein he states, *inter alia*, that he is refusing installation of a smart meter at the Service Location, that Act 129 is an "opt-in" and he does not choose to "opt-in." The Company provided a response via email to the Complainant advising that the Company is required to install a smart meter at the Service Location pursuant to Act 129. Further, the Company's response attempted to address the Complainant's concerns regarding the smart meter and directing the Complainant to additional resources found on the Company's website. On August 17, 2017, the Complainant sent an email to Company inquiring about the availability of a "wired" smart meter. The Company promptly responded to the Complainant via email that a "wired" smart meter was not an option. On August 18, 2017, the Complainant sent an additional email to Company reiterating his refusal of installation of the smart meter at the Service Location for health reasons. The Company responded and attempted to address the Complainant's concerns to no avail. On December 4, 2017, the Company mailed additional fact sheets regarding the smart meter to the Complainant in an effort to address the Complainant's concerns.

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the Commission. On January 29, 2019, the Company received a letter from the Complainant in which he reiterated his refusal of the installation of a smart meter at the Service Location.

8. On January 30, 2019, the Complainant filed a Formal Complaint with the Commission against Met-Ed at the above-captioned docket. The Company was electronically served with the Formal Complaint on January 31, 2019.

9. Met-Ed is timely filing its Answer and New Matter contemporaneously with this Preliminary Objection, which Answer and New Matter is incorporated into this Preliminary Objection as if fully set forth herein.

III. Argument

10. The Commission's Rules of Practice and Procedure permit parties to file preliminary objections. The grounds for preliminary objections are limited to those set forth in 52 Pa. Code § 5.101(a) as follows:

- (1) Lack of Commission jurisdiction or improper service of the pleading initiating the proceeding.
- (2) Failure of a pleading to conform to this chapter or the inclusion of scandalous or impertinent matter.
- (3) Insufficient specificity of a pleading.
- (4) Legal insufficiency of a pleading.
- (5) Lack of capacity to sue, nonjoinder of a necessary party or misjoinder of a cause of action.
- (6) Pendency of a prior proceeding or agreement for alternative dispute resolution.
- (7) Standing of a party to participate in the proceeding.

11. The Commission's procedure regarding the disposition of preliminary objections is similar to that utilized in Pennsylvania civil practice.³

³ *Equitable Small Transportation Intervenors v. Equitable Gas Company*, Docket No. C-00935435 (Opinion and Order entered July 18, 1994).

12. A preliminary objection in civil practice seeking dismissal of a pleading will be granted only where relief is clearly warranted and free from doubt.⁴ The Commission has adopted this standard.⁵

13. In accordance with Section 701 of the Code⁶ a person may file a complaint which sets forth “any act or thing done or omitted to be done by any public utility in violation, or claimed violation, of any law which the commission has jurisdiction to administer, or of any regulation or order of the commission.” As explained below, the Company has not violated the Public Utility Code or the orders or regulations of the Commission.⁷ In fact, the Company’s actions have been in compliance with Act 129 and the June 5 Order.

14. The moving party may not rely on its own factual assertions but must accept for the purposes of disposition of the preliminary objection, all well-pleaded, material facts of the other party, as well as every inference fairly deducible from those facts.⁸ Therefore, in ruling on a preliminary objection, the Commission must assume, for decisional purposes only, that the factual allegations of the Formal Complaint are true.⁹

15. Met-Ed’s smart meter deployment plan was approved by the Commission at Docket No. M-2013-2341990 by Order entered June 5, 2014. In accordance with the June 5 Order, the Company filed its final Smart Meter Deployment Plan (“SMP”) on June 16, 2014. The SMP was approved by the Commission on June 20, 2014. The Complainant challenges no aspect of the Company’s provision of electric service other than the installation of a smart meter at the Service Location, as required by Act 129 and the Company’s SMP.

⁴ *Interstate Traveler Services, Inc. v. Pa. Dept. of Environmental Resources*, 406 A.2d 1020 (Pa. 1979); *Rivera v. Philadelphia Theological Seminary of St. Charles Borromeo, Inc.*, 595 A.2d 172 (Pa. Super. 1991).

⁵ *Montague v. Philadelphia Electric Company*, 66 Pa. PUC 24 (1988).

⁶ 66 Pa.C.S. § 701.

⁷ *Id.*

⁸ *County of Allegheny v. Commw. of Pa.*, 490 A.2d 402 (Pa. 1985).

⁹ *Id.*

16. Commission precedent is uniform that it cannot grant exceptions to the statutory directive that smart meters be installed by allowing customers to opt out.¹⁰

17. Assuming the facts pleaded in the Formal Complaint are true, as the Commission must for the purposes of ruling on a preliminary objection, the Complainant has failed to allege that Met-Ed has committed or omitted an act in violation of a Commission statute, regulation, order, or Met-Ed's tariff, a finding of which must be made in order to sustain a formal complaint.¹¹

18. Because Act 129 and the Commission's orders not only authorize but require the Company to develop and implement a smart meter procurement and installation plan, and do not allow a customer to opt out of having a smart meter installed, this Formal Complaint must be dismissed. As a matter of law, the Company is required to install a smart meter at the Service Location. As such, the Commission cannot find the Company to be in violation for having attempted to follow the law as it has done here.

19. Therefore, the Formal Complaint is legally insufficient because it fails to state a claim upon which the Commission can grant relief.¹²

20. The Commission may dismiss a complaint without hearing if a hearing is not necessary in the public interest.¹³

¹⁰ *Negley v. Metropolitan Edison Company*, Docket No. C-2010-2205305 (Final Order entered March 3, 2011); *Lutherschmidt v. Metropolitan Edison Company*, Docket No. C-2010-2200353 (Final Order entered March 25, 2011). The Commission has continued to uphold installation of smart meters and imposition of smart meter charges on customers' bills by dismissing complaints opposing installation of smart meters and imposition of smart meter charges on the basis of legal insufficiency. *Corbett v. Pennsylvania Power Company*, Docket No. C-2011-2219898 (Final Order entered May 27, 2011); *Jones v. Metropolitan Edison Company*, Docket No. C-2011-2224380 (Final Order entered June 28, 2011); *Griffin v. Metropolitan Edison Company*, Docket No. C-2012-2300172 (Final Order entered July 31, 2012); *Brake v. West Penn Power Company*, Docket No. C-2013-2367308 (Opinion and Order entered November 14, 2013); *Drake v. Pennsylvania Electric Company*, Docket No. C-2014-2413771 (Final Order entered June 12, 2014); *Efaw v West Penn Power Company*, Docket No. C-2014-2413744 (Final Order entered June 12, 2014). See also, the Initial Decision of ALJ Susan D. Colwell in *Dennis McEhwain v. Pennsylvania Power Company*, Docket No. C-2014-2451478 issued December 16, 2015.

¹¹ See 66 Pa.C.S. § 701; *County of Allegheny, supra*.

¹² See 52 Pa. Code § 5.101(a)(4).

¹³ 66 Pa.C.S. § 703(b); 52 Pa. Code § 5.21 (d).

21. Recently, the Commission set for hearing two cases in which the complainant was opposed to the installation of a smart meter at their premises.¹⁴ These cases represent a departure from past Commission practice of dismissing such complaints on Preliminary Objections. The Commission stated that where a complainant has presented specific factual averments regarding the health or other effects that they have experienced after a smart meter was installed at their home, the Commission has overruled Preliminary Objections and allowed a case to proceed. Specifically, in *Kreider*, the complainant alleged specific deleterious health effects after installation of a smart meter affecting her specific medical condition. Further, in *Van Schoyck*, the complainants alleged potential health risks due to constant ringing noise in their home and their inability to sleep since the time the smart meter was installed.¹⁵ In contrast, in the instant case, the Complainant has made no specific factual averments regarding any health effects experienced *after* a smart meter has been installed. Specifically, the Complainant is refusing smart meter installation at the Service Location due to generic health concerns.¹⁶ The Commission has not recognized a customer's lack of consent to install a smart meter as sufficient to overcome preliminary objections.¹⁷ Further, the Commission has upheld decisions finding that a utility has the ability to terminate the service of a customer who refuses installation of a smart meter.¹⁸ Therefore, the Company respectfully submits that the matters plead in the subject Formal Complaint do not meet

¹⁴ *Susan Kreider v. PECO Energy Company*, Docket No. C-2015-2469655 (Order on Reconsideration entered January 28, 2016); *Stephen and Diane Van Schoyck v. PECO Energy Company*, Docket No. C-2015-2478239 (Opinion and Order entered February 25, 2016).

¹⁵ *Id.*

¹⁶ Attachment to Formal Complaint.

¹⁷ *Richard and Marie Fugo in care of Fugo Eye Institute v. PECO Energy Company*, Docket Nos. C-2015-2519763 and C-2015-2519770 (Order entered April 6, 2016).

¹⁸ *Art Larson v. PECO Energy Company*, Docket No. C-2014-2451754 (Opinion and Order entered June 11, 2015). See also, *Catherine J. Frompovitch v. PECO Energy Company*, Docket No. C-2015-2474592 (Opinion and Order entered May 3, 2018).

the standards set in the *Kreider* and *Van Schoyck* cases such that this matter can survive dismissal on preliminary objections.

22. In *Charles F. Jackson v. Pennsylvania Electric Company*, Docket No. C-2017-2600495 (Order Entered August 31, 2017), the Commission approved the Initial Decision of ALJ David A. Salapa, dated June 26, 2017, which granted the preliminary objections of Pennsylvania Electric Company and dismissed the formal complaint of Mr. Jackson (who was disputing the installation of a smart meter), finding that the formal complaint was legally insufficient, pursuant to 52 Pa. Code § 5.101(a)(4), in that the complaint failed to allege that the utility violated the Public Utility Code, Commission regulations or orders or the utility's tariff provisions. The respondent was found to be authorized to install smart meters and impose a charge on its customers to develop and implement a smart meter procurement and installation plan that will lead to the installation of smart meters throughout its service territory. ALJ Salapa further found that the respondent was authorized to terminate the Mr. Jackson's service if he refused to provide the respondent with access to its meter and equipment to install the smart meter.

This Commission decision was entered after *Kreider*. The Formal Complaint is similar to the alleged averments in the formal complaint at Docket No. C-2017-2600495, in that the Complainant has only alleged that he does not want a smart meter installed at the Service Locations. The Complainant has not set forth in his complaint that any act done by the Company that violates a Commission regulation, statute or order.

23. Therefore, the Company respectfully submits that the matters plead in the Formal Complaint do not meet the standards set in the *Kreider* and *Van Schoyck* cases such that this matter can survive dismissal on preliminary objections.

24. Further, the Commission has upheld decisions granting preliminary objections and dismissing complaints for legal insufficiency opposing smart meter installation. In *Negley*, ALJ Susan D. Colwell dismissed a complaint opposing installation of smart meters for legal insufficiency. ALJ Colwell concluded that Act 129 of 2008 authorized the installation of smart meters by EDCs. ALJ Colwell held that the Commission's orders approving EDCs smart meter plans did not exempt any customers from the smart meter plans. By Commission final order entered March 3, 2011, ALJ Colwell's Initial Decision became final without further Commission action.

25. Rule 9 of the Company's Commission-approved tariff¹⁹ allows the Company to have access to its customers' premises for any and all purposes relating to the supply of electric energy which includes the exchange of meters. The Complainant's refusal to allow the Company access to its own meter is a violation of Rules 9 and 20 of the Company's Commission-approved tariff²⁰ and is grounds for termination of service in accordance with 66 Pa.C.S. § 1406(a)(4) and 52 Pa. Code § 56.81(3). The Commission has also upheld decisions finding that a utility has the ability to terminate the service of a customer who refuses installation of a smart meter.²¹

26. Because Act 129 of 2008 and the Commission's orders authorize the Company to develop and implement a smart meter procurement and installation plan, the Complainant has not set forth in his complaint any act done by the Company that violates a Commission regulation, statute or order.

¹⁹ *Metropolitan Edison Company Retail Electric Service Tariff*, Electric Pa. PUC No. 52, pp. 40, issued May 1, 2015, effective August 15, 2015.

²⁰ *Metropolitan Edison Company Retail Electric Service Tariff*, Electric Pa. PUC No. 52, pp. 40, 55, issued May 1, 2015, effective August 15, 2015.

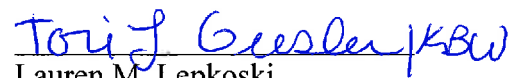
²¹ *Art Larson v. PECO Energy Company*, Docket No. C-2014-2451754 (Opinion and Order entered June 11, 2015). See also, *Catherine J. Frompovitch v. PECO Energy Company*, Docket No. C-2015-2474592 (Opinion and Order entered May 3, 2018).

IV. Conclusion

WHEREFORE, for the foregoing reasons, Metropolitan Edison Company respectfully requests that the Commission: (1) grant its Preliminary Objections and strike the Complainant's request for an exemption from the installation of a smart meter; (2) dismiss the Formal Complaint in its entirety with prejudice; and (3) grant the Company such other relief as may be just and reasonable under the circumstances.

Respectfully submitted,

Dated: February 20, 2019



Lauren M. Lepkoski
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Counsel for Metropolitan Edison Company

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

V. WES ZIMMERMAN :
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 v. : **Docket No. C-2019-3007568**
 :
METROPOLITAN EDISON COMPANY :

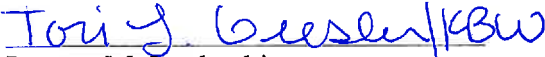
CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the Preliminary Objections of Metropolitan Edison Company to the Formal Complaint of V. Wes Zimmerman upon the individual 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:

V. Wes Zimmerman
69 Goat Hill Road
Boyertown, PA 19512

Dated: February 20, 2019


Lauren M. Lepkoski
Tori L. Giesler
FirstEnergy Service Company
2800 Pottsville Pike
P.O. Box 16001
Reading, Pennsylvania 19612-6001
(610) 921-6203
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