

Tori L. Giesler, Esq.
(610) 921-6203
(330) 315-9263 (Fax)

February 21, 2019

VIA ELECTRONIC FILING

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

Re: Christopher and Jo-Anna Tellefsen v. Metropolitan Edison Company
Docket No. C-2018-3005250

Dear Secretary Chiavetta:

By Interim Order dated January 7, 2019, Administrative Law Judge Jeffrey Watson established a procedural schedule in this matter such that discovery would close on April 12, 2019 and a status report would be offered by the parties no later than April 30, 2019. At this point, the parties have concluded discovery, and a stipulation narrowing the issues (enclosed) to be addressed has been reached. The parties have further agreed that an evidentiary hearing in this matter is not required and agree to the submission of legal briefs on the issue as outlined in the stipulation, with a proposed briefing deadline of March 15, 2019. **As such, the Company respectfully submits, with the consent of the Complainants in this matter, the enclosed stipulation between the parties and respectfully requests that this matter be set for a briefing deadline of March 15, 2019.**

Copies are being provided in accordance with the Certificate of Service. Should you have any questions or concerns regarding this information, please feel free to contact me.

Very truly yours,



Tori L. Giesler

Enclosures

cc: Certificate of Service

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**CHRISTOPHER AND JO-ANNA
TELLEFSEN**

v.

METROPOLITAN EDISON COMPANY

:
:
:
:
:
:

Docket No. C-2018-3005250

**STIPULATION BETWEEN
CHRISTOPHER AND JO-ANNA TELLEFSEN
AND METROPOLITAN EDISON COMPANY**

Metropolitan Edison Company (“Met-Ed” or the “Company”) and the Christopher and Jo-Anna Tellefsen (“Complainants”) (collectively, the “Stipulating Parties”) enter into this Stipulation to: (1) narrow the issues expressed by the Complainants in their Formal Complaint (“Complaint”) which was served on the Company on October 10, 2018 regarding installation of a smart meter at 3324 River Road, Mount Bethel, Pennsylvania 16404 (“Service Location”); and (2) proceed forward with the Complaint solely on whether Act 129 of 2008¹ mandates the installation of a smart meter at the Service Location.

Accordingly, the Stipulating Parties stipulate as follows:

1. On October 10, 2018, the Complainants’ Formal Complaint at the above-captioned docket, which states that they do not want a smart meter installed at the Service Location, was served on the Company. Within their Formal Complaint, the Complainants state that installation of the smart meter is not required by Act 129.²

¹ Act 129 of 2008, 66 Pa.C.S. § 2807 *et. seq.* (“Act 129”).

² Complaint ¶ 4.

2. On October 30, 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 December 3, 2018, Administrative Law Judge (“ALJ”) Jeffrey A. Watson was assigned as the Presiding Officer in the above-captioned proceeding.
4. On January 7, 2019, ALJ Watson issued an Interim Order, which denied the Company’s Preliminary Objections.
5. On January 7, 2019, ALJ Watson issued an Interim Order Establishing Initial Litigation Schedule.
6. On January 11, 2019, an Interim Order Scheduling Prehearing Conference was issued.
7. On January 11, 2019, ALJ issued an Initial Call-In Telephonic Prehearing Conference Notice.
8. A Prehearing Conference was held on February 4, 2019 before ALJ Watson.
9. During the Prehearing Conference, the Complainants stated that they are not alleging claims regarding health, safety or privacy concerns.
10. The Complainants further stated that they desired to move forward with the Complaint regarding the single issue of whether or not smart meter installation is mandated by Act 129.
11. As such, the Stipulating Parties hereby stipulate that the only issue to be addressed through the remainder of this proceeding is whether or not smart meter installation is mandated by Act 129.

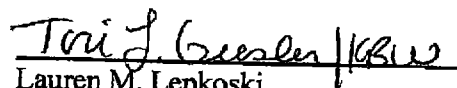
12. The Stipulating Parties further stipulate that there are no material issues of fact to be addressed at any evidentiary hearing in this matter.

13. As such, the Stipulating Parties agree that an evidentiary hearing in this matter is not required and agree to the submission of legal briefs on the issue, with a proposed briefing deadline of March 15, 2019.

14. The undersigned are authorized to execute this Stipulation on behalf of the respective Stipulating Parties.

Stipulated and agreed, this 8th day of February 2019.

For Metropolitan Edison Company:



Lauren M. Lepkoski

Attorney No. 94800

Tori L. Giesler

Attorney No. 207742

FirstEnergy Service Company

2800 Pottsville Pike

P.O. Box 16001

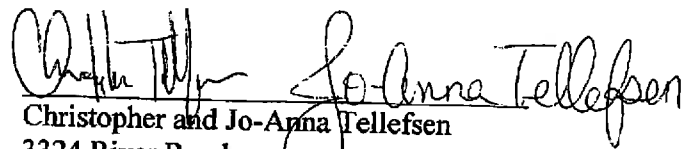
Reading, PA 19612-6001

Phone: (610) 921-6203

Phone: (610) 921-6658

llepkoski@firstenergycorp.com

tgiesler@firstenergycorp.com



Christopher and Jo-Anna Tellefsen

3324 River Road

Mount Bethel, PA 18343

(570) 897-0235

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

CHRISTOPHER AND JO-ANNA TELLEFSEN :
 :
 v. : **Docket No. C-2018-3005250**
 :
METROPOLITAN EDISON COMPANY :

CERTIFICATE OF SERVICE

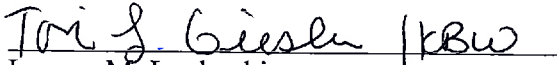
I hereby certify that I have this day served a true copy of the aforementioned documents upon the individuals listed below, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

Service by electronic and First Class Mail, postage prepaid, as follows:

Christopher and Jo-Anna Tellefsen
3324 River Road
Mount Bethel, PA 18343
Joannatellefsen@gmail.com

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

Dated: February 21, 2019


Lauren M. Lepkoski
Tori L. Giesler
FirstEnergy Service Company
2800 Pottsville Pike
P.O. Box 16001
Reading, Pennsylvania 19612-6001
(610) 921-6203
(610) 921-6658
llepkoski@firstenergycorp.com
tgiesler@firstenergycorp.com

Counsel for Metropolitan Edison Company