

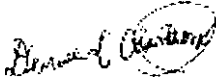
January 10, 2019

**Re: Denise Colantuono v. Metropolitan Edison Company
Docket No. C-2018-3006030**

Dear Secretary Chiavetta,

Please file this letter explaining the need for additional time, I had family obligations and was not able to complete this in time.

Respectfully,



Denise Colantuono

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20. Requires a legal conclusion by way of further answer because I, like many other disabled complainants cannot tolerate a smart meter on my house and we have asked for accommodation for our medical conditions.

21. Denied. Susan Krieder was not recent. She died in 2017 because exposure to wireless radiation. See *Romeo vs PECO* (No. 498CD2016). For example, see also *Povacz v PECO* (C-2015-247-5023), *Murphy vs PECO* (C-2015-2475726), *McKnight vs PECO* (C-2017-2621057), *Schumukler vs PPL* (C-2017-2621285), *Klein vs PPL* (C-2017-2621072), *Bachman vs PECO* (C-2017-2623504), *Paul vs PECO* (C-2015-2475355).

22 Denied. You did not read my complaint because it alleges a violation of Title 66, Sections 1501, 1502 and 1503. Mr. Jackson's complaint was not readily available for me to read but if it did not allege violations of 1501, 1502 or 1503 it might be properly dismissed.

23. Denied. Med Ed failed to read to read my complaint. If they had they would have seen violations of 1501, 1502 and 1503.

24. Denied. The Negley Case was decided in 2011, before Krieder. And therefore, Med Ed's reference to the Negley case shows that they are not making convincing arguments.

25. Denied. The utility may not terminate service once a formal complaint has been filed. PA 52 Code, Section 56.92.

26. Denied. Met Ed has violated Sections 1501, 1502 and 1503, The Americans with Disabilities Act as well as other violations.

27. This certificate of service is in error because Lauren Lapkowski and Tori LL did not serve this on me nor did the PUC.

28. Denied. By way of further answer. Not responsible for your inadequate records

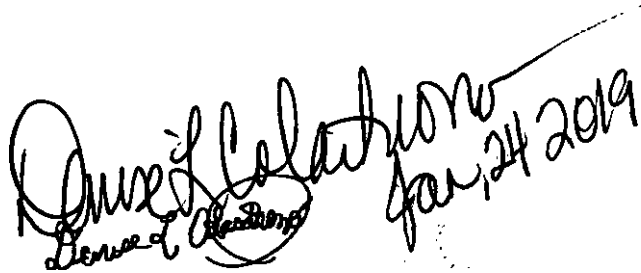
29. Denied. As a conclusion of law by way of further answer.

1.36 Verification

Verification

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

01-09-19

Handwritten signature of Denise Colantuono in black ink, with the date "Jan 24 2019" written below it. The signature is written in a cursive style.

Date

Signature

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**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Denise Colantuono

v.

METROPOLITAN EDISON COMPANY

Docket No. C- 2018-3006030

ANSWER TO NEW MATTER

1-10. Unable to admit or deny because of the complexity of combining New Matter with an Answer.

11. Admitted by way of further answer. The averments of paragraphs 1-11 of the complaint are incorporated by reference.

12. Admitted.

13. Denied as a conclusion of law.

14. Denied after reasonable investigation complainant is without knowledge or sufficient information regarding the truth of this averment.

15. Admitted by way of further answer, company is only now in process of deploying smart meters injurious to the health of the complainant.

16. Denied as a conclusion of law.

17. Denied as a conclusion of law. By way of further answer company did violate the Public Utility Code as will be set forth in the complaint.

18. Denied as a conclusion of law.

19. Denied as a conclusion of law. By way of further answer, Met Ed is apparently unaware of the requirements of the Krieder Case (Krieder v PECO 2015-2469655, Povacz v. PECO C-2015-2475023, Murphy v. PECO C-2015-2475726, Schumkler v. PPL C-2017-2621285, Klein v. PPL C-2017-2621072, McKnight v PECO C-2017-2621057, Bachman v. PECO 2017-2623504, Paul v PECO C-2015-2475355, Romeo vs PECO 498 CD2016, Hriadal v Duquesene Light C-2016-2571726 and Randall-Albrecht v PECO C-2016-253766 in which formal complaints alleging violations of 1501 and 1502 are required a hearing. Wherefore, I request that my complaint be given full consideration and that I be afforded the opportunity to proceed in this matter for all of Met Ed's violations.

20. No responsive pleading required.

21. Admitted.

22. Denied after reasonable investigation. Complainant does not have sufficient knowledge or information of the averment set forth in paragraph 22. By way of

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further answer, company's failure to maintain adequate records does not prove that complainant did not contact company.

23. Denied. To the contrary, complainant did contact company prior to the filing of the formal complaint. The remaining allegations set forth in paragraph in 23 are denied as a conclusion of law.

1.36 Verification

Verification

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

01-09-19

*Denise Colantuono
Denise Colantuono
Jan 24 2019*

Date

Signature

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BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Denise Colantuono

:

v.

METROPOLITAN EDISON COMPANY

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Docket No. C- 2018-3006030

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of a Notice of Request for Additional Time to answer Metropolitan Edison's The Answer, Preliminary Objections and New Matter in the Formal Complaint of Denise Colantuono upon the individuals listed below, in accordance with the requirements of 52 Pa Code Sections 1.54 9 (relating to service by a participant.)

Service by e-file as follows

PA PUC

Service by Email

Lauren M Lepkowski
Tori L. Geisler
First Energy Service Company
llepkoski@firstenergycorp.com
tgiesler@firstenergycorp.com

Dated: December 8, 2018

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Denise Colantuono

Denise Colantuono
Jan 24, 2019

Denise Colantuono
110 Misty Lane
Reading, PA 19606

Colantuono
110 Misty Lane
Reading PA 19606



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PA PUC
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Commonwealth of PA
Pennsylvania Public Utility Commission
400 N 5th 2nd Floor
Harrisburg PA 17120

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