

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

RECEIVED
2019 FEB 25 AM 9:56
PA PUC
SECRETARY'S BUREAU

RE: Evelyn D. Dreher v. Metropolitan Edison Company
Docket No. C-2018-3005217

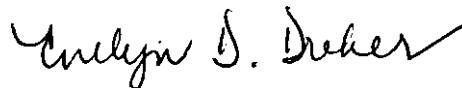
Dear Secretary Chiavetta:

Enclosed please find my response to the Motion to Compel served by Metropolitan Edison Company dated February 14, 2019 and received on February 19, 2019. Please note that when I sent in my answers to the Interrogatories requested by Metropolitan Edison, that I did include answers to those questions and noted that I did so under objection excluding only our physician's name, address and phone numbers. I did not send a copy to you or to Administrative Law Judge Jeffrey A. Watson as I was directed by counsel for Metropolitan Edison to send you both only a cover sheet and Certificate of Service. However, for the record, I am submitting the information requested in this Notice to Compel and forwarding to legal counsel for Metropolitan Edison as requested.

File with:
Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
PO Box 3265
Harrisburg PA 17105-3265

With a copy to:
ALJ Jeffrey A. Watson
Pennsylvania Public Utility Commission
Piatt Place, Suite 220
301 5th Avenue
Pittsburgh PA 15222

Laurie M. Lepkoski
Tori Giesler
First Energy Service Company
2800 Pottsville Pike
PO Box 16001
Reading PA 19612-6001



Evelyn D. Dreher
Dated February 20, 2019

FEB 25 2019

Secretary Chiavetta: Response to Notice to PleadPA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

On page 6 of the Notice to Compel No. 15: legal counsel for Metropolitan Edison states that in my Objection I noted that my son and his wife "were getting headaches and were unable to sleep at night" due to the installation of a smart meter."

1. Agree and Disagree:

- A. I did make this statement, however, my son Michael and his wife do not live at my home. They live in Tobyhanna Pa, they do have a smart meter at their residence and their power company is PPL, not Met Ed. It was because of the symptoms that they were experiencing that I began researching the effects of non-ionizing RF related to smart meters.
- B. I do not have a smart meter installed at my home and have not stated that my husband and I, or my son Christopher who currently resides at my residence, are currently experiencing any symptoms related to smart meters.
- C. The effects of non-ionizing RF, that I included in my original complaint, was from reports by doctors, scientists, physicians and experts in their fields *who have done studies* on the effects of non-ionizing RF and have reported those adverse health effects.

On page 6 No. 16 of the Motion to Compel: Legal counsel for Metropolitan Edison states that:

- A. "The medical information requested is tied *only* to health issues and records relevant to smart meter installation raised the Complainant."
- B. "The Complainant affirmatively claims that the installation of a smart meter would cause or contribute to an adverse health condition."

Response:

- a. Again, in response to part A of No. 16, I have not stated that my husband, my son Christopher, or myself are currently experiencing any negative health effects from smart meter RF as we do not have a smart meter installed at our home address.
- b. However, because the information requested relates to claims that the installation of a smart meter could cause or contribute to adverse health condition, I have complied with the request for health information simply to have it on the record so that in the future, should my husband, my son or I experience health effects related to a smart meter RF that the record would show that we have no prior existing conditions related to smart meter exposure before the installation of a smart meter.
- c. The only information that I did not include was my husband's, or my, physician's information. I was forthcoming regarding the fact that my husband has type 2 diabetes and he currently is prescribed medication to help keep it under control along with diet, and that I am currently taking medication for pre-hypertension since my visit to the emergency room in September of 2018. As stated in the answer to Interrogatories, my son Christopher has no known medical conditions and only visits Urgent Care when he is sick and in need of antibiotics.

On page 7 and No. 17 of Motion to Compel, legal counsel for Metropolitan Edison states that: "the Complainant has not explained how the information requested may or may not be privileged. Having raised specific health-related concerns, the Company is entitled to the requested information to enable it to fully investigate what information the complainant relied upon to make the specific and detailed allegations contained in the formal complaint as well as a response to Objection.

- A. My physician's name, address and phone number is private and my medical records are private. And I have not stated that anyone in my household is experiencing any of the symptoms related to RF radiation exposure from smart meters.
- B. The Commission puts all these records online as public information, which is how I happened to find information in prior hearings from other people residing in the state of Pennsylvania. I do not want my private medical information, my husband's, or my physicians listed on a website that anyone can access by simply searching your public records.
- C. Therefore, I am requesting a Protective Order to ensure that adequate procedural safeguards are put in place to make certain that my husband's sensitive medical information, and mine, is not improperly disclosed to the public as so stated by legal counsel for Metropolitan Edison.
Bottom of page 7.

On page 7 No. 18, of Motion to Compel, Metropolitan Edison states that: "The Company's questions (Interrogatories 26 & 27) regarding her educational background and employment history are not relevant...throughout her complaint and responsive pleading, the Complainant provides substantial attachments and citations to materials that allegedly support her position. The Complainant provides numerous interpretations of these materials and makes a wide array of conclusory assertions." Legal counsel goes on to list some of the examples of assertions I have made.

In reply:

- A. The "substantial attachments and citations" were provided as the basis of my complaint and do support my position.
- B. If legal counsel for Metropolitan Edison is stating that a person must have a degree to read, understand and agree with information written by experts in the fields of medicine and science, I think they are mistaken. I never stated that I have a degree in any of these areas when I quoted these experts. I was introducing into record *their* expert opinions and that is what I will be relying on for the hearing, *their* expert opinions. Not my level of education, which I believe is irrelevant. My ability to read, understand, agree with and include such documents which support my initial complaint is not a matter of having a BA, an MA or a PhD. Rather it was because of the opinions of these experts that I felt compelled to open a Formal Complaint.
- C. I believe this is a ploy by legal counsel for Metropolitan Edison to reduce my intelligence and common sense to that of a rock.

On page 8 of the Notice to Compel and No. 19, Metropolitan Edison states that: "the Complainant's educational background and employment history are directly relevant to her qualifications to make the assertions contained in the Formal Complaint and Response to Objection. Discovery provided the Company the opportunity to assess the credibility of these claims."

- A. My assertions are based on the evidence in the reports I submitted and peer studies which support my claim. Legal counsel is trying to take credibility away from the experts who give their opinions by making my level of education and my employment history of greater importance than the documents I submitted. The expert opinions of these professionals are backed up by research that has been done over many years and further, there are thousands more that the industry has chosen to ignore. However, I have provided my educational background under objection in my response to Interrogatories.

- B. I do not believe that my employment history has any relevance in this proceeding but I have nevertheless provided it in my response to Interrogatories.
- C. I am of the opinion that Metropolitan Edison and their legal counsel think that if they can show that I am uneducated and have no employment background in the areas of the documents I have submitted to support my complaint, that they can use that to dismiss the case and force me to put this meter on my home against my will and better judgment.

Finally, I don't understand how legal counsel expects me to get any information to them within 5 days of the date of entry when the date of entry was February 14th and it was delivered on February 19th. Is it legal counsel's hopes that if I can't meet the expected date that they can throw the case out on the grounds that I was non-compliant?

For the record, I do have a full time job and a household to take care of. As it is I've had many sleepless nights trying to write all these responses to ensure that I don't miss any deadlines. Especially when the opening statement on page 2 of the Notice to Plead states that if I do not reply within **five (5) days** that the facts set forth by Metropolitan Edison Company Motion may be deemed to be true and thereby require no other proof.

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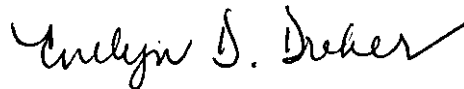
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Tori Giesler
First Energy Service Company
2800 Pottsville Pike
PO Box 16001
Reading PA 19612-6001



Evelyn D. Dreher
Dated February 20, 2019

For the record:

- A. My husband, Edward J. Dreher has been diagnosed with Type 2 diabetes for which is prescriber 1,000 mg of Metformin 2 times per day, along with diet to keep it under control.

I can't remember the exact date he was diagnosed but it is well over 10 years.

His physicians name, phone number and address are as follows:

Dr. Francescangelli
LVG Internal Medicine
179 Independence Rd 2nd Floor
East Stroudsburg PA 18301
570-421-8526

I was diagnosed in September of 2018 with pre-hypertension for which I take 25 mg of Atenolol once per day.

My physician's information is the same as my husbands.

My son, Christopher M. Dreher, moved back home recently. He has no family physician and no know medical problems. He visits Urgent Care when he is sick and in need of antibiotics.

- B. My educational background: High School GED
- C. My employment history is as follows:

Shawnee Development July 1995-December 2005 Sales and Marketing

Shawnee Development Inc. was acquired by Wyndham

Points Professionals January 2006-May 2006 Marketing Manager for Referral Services

Points Professionals is no longer in business.

In April of 2006 my mother, then 78 years of age, suffered a heart attack and was hospitalized. I gave up my job to stay home to attend to my mother, who lived with me until her death in April 2009. While at home with mom, I was lucky to find a company that allowed me to work remotely.

Crown Resorts May 2006-August 2008 I was told that they believed I would be employed for a minimum of five (5) years, however the sales team that I was paired up with, and I, finished the work in just two years and three months and I was let go due to lack of work with exceptional recommendations. Remote

From approximately 2006-2011 I worked from home remotely for various companies including

Dan Vigilante CPA, AMI Collections Agency

Wyndham Resorts can't remember dates

Prospect Cemetery can't remember dates

MH Marketing can't remember dates

I did not work the entire year from 2015-2016

College Publications January 2017-current

315 Dartmouth Drive

Marshalls Creek PA 18335

E Dreher
31 Crown Point Dr.
E. Strbg PA 18302

LEHIGH VALLEY PA 180

21 FEB 2019 PM 4 L



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