

432 E. Wesner Rd
Blandon, PA 19510
March 18, 2019

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PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

Rosemary Chiavetta
Secretary
Pennsylvania Public Utility Commission
400 North Street 2ND Floor
Harrisburg, PA 17120

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

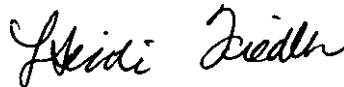
Dear Ms. Chiavetta:

Please find enclosed Complainant's Request for Cancellation of Prehearing Conference and Request for Amended Litigation Schedule.

I am also serving copies to the Honorable Tori Giesler of First Energy Services Company and to the Honorable Jeffrey Watson, Administrative Law Judge, Pennsylvania Public Utility Commission.

Thank you for your attention to this matter.

Very truly yours,



Heidi Fiedler

Enclosures

cc: The Honorable Jeffrey Watson, Pennsylvania Public Utility Commission
The Honorable Tori Giesler, First Energy Services Company

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

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MAR 18 2019

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

HEIDI FIEDLER

Complainant,

V.

METROPOLITAN EDISON COMPANY

Respondent.

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:
:

Docket No. C-2018-3003642

REQUEST FOR CANCELLATION OF PREHEARING CONFERENCE AND
REQUEST FOR AMENDED LITIGATION SCHEDULE

Complainant contends that a genuine dispute exists, including serious safety violations and approximately \$7500 in property damage caused by Respondent. Complainant further contends that she is entitled to the submittal of this evidence by means of an evidentiary hearing and this material be formally and individually considered as part of her right to due process.

Complainant sets forth the following material facts as evidence that a prehearing conference is inappropriate, and that Complainant should be afforded an amended litigation schedule with the filing of her Second Amended Complaint.

1. Neither Complainant or Respondent have requested a prehearing conference in this matter. Your Honor has previously stated in your Interim Order *Establishing Initial Litigation Schedule*, dated September 21, 2018, that "Any party may request a prehearing conference or settlement conference, in writing, after conferring with the opposing Party and requesting consent to the scheduling of such a conference." Instead,

Respondent, in a February 28, 2019 status report, requested a date for an evidentiary hearing and deadlines for other testimony. Respondent has not contacted Complainant to schedule a prehearing conference.

2. On March 1, 2019, Your Honor issued *Interim Order Rescheduling Prehearing Conference*, which scheduled a prehearing conference on April 19, 2019. This order did not specify that Complainant had also submitted a status report dated February 28, 2019. Complainant mailed her status report and Second Amended Complaint on February 28, 2019 to ALJ Jeffrey Watson. A copy of this report is included as Exhibit 1. In addition, Exhibit 2 shows the certified mail receipts, indicating that the status report and the Second Amended Complaint were received on March 4, 2019.
3. On March 13, 2019, Your Honor issued *Prehearing Order Rescheduling Prehearing Conference*, which rescheduled the April 19 prehearing conference to March 26. This Order states that “No response was provided from Complainant.” However, Complainant did in fact furnish a February 28 status report. Complainant received this new Order on March 15, which is only 11 days before the new prehearing conference date. This extremely short notice for the prehearing conference and the lack of discovery for the Second Amended Complaint puts the *pro se* Complainant at a very substantial disadvantage.
4. A prehearing conference is a reasonable protection offered to the defendants' rights, but this compensation of granting a prehearing conference is commonly practiced because of the enormous powers that can be used and invariably placed at the disposal of a prosecuting party. In Complainant's case, as a *pro se* litigant, there are no

legal advantages. Complainant does not have a legal background, the legal expertise, and the vast capital and army of attorneys that the Respondent has available. All of these factors cause Complainant to be at a huge disadvantage and experience an undue burden to her limited resources and time. The Pennsylvania Public Utility Commission's mission statement states that the Commission “ensures safe and reliable utility service” and “protects the public interest” and “balances the needs of consumers and utilities.” Accordingly, an evidentiary hearing is needed for Complainant to present her case, including the evidence, testimony and the legal grounds necessary for her to demonstrate that Respondent failed to provide safe and reliable service, caused approximately \$7500 in property damage, and would continue to fail to provide safe and reliable service if a smart meter were to be installed on her property.

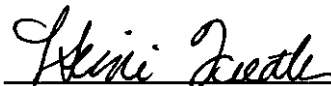
5. Furthermore, Complaint requests an amended litigation schedule to accommodate the additional issues that she raised in her Second Amended Complaint dated February 28, 2019. In her status report, Complainant requested additional discovery time. Additional discovery time was also requested in the Second Amended Complaint, which is included as Exhibit 3.
6. Complainant proposes the following amended litigation schedule to properly accommodate the very important additional issues raised in the Second Amended Complaint and to also provide the additional time necessary to provide the documents that Respondent has requested in their discovery request:
May 31, 2019 deadline to provide the names and summaries of testimony for all witnesses; and
July 31, 2019 deadline to conclude all discovery; and

August 31, 2019 to provide a status report. Complainant is aware of the Pennsylvania Public Utility Commission granting an approximately 60 day discovery extension when the Respondent did not meet a discovery deadline in a similar case.

7. It is Complainant's belief that the cancellation of the prehearing conference and the approval of the proposed amended litigation schedule will resolve the issues raised by Respondent in their Motion to Dismiss and also ensure Complainant's legal rights to a fair and equitable evidentiary hearing, as guaranteed by the Commission's mission statement. Complainant avers that she will be able to provide all of the remaining Respondent's discovery requests that are expected to be available to her, with the granting of the additional discovery time.

WHEREFORE, Complainant respectfully requests that her Request for the Cancellation of the Prehearing Conference, and her Request for an Amended Litigation Schedule be granted, as has occurred in other similar cases before the Pennsylvania Public Utility Commission.

Respectfully submitted,



Heidi Fiedler
432 E. Wesner Rd
Blandon, PA 19510

Dated: March 18, 2019

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PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

EXHIBIT 1

432 E. Wesner Rd
Blandon, PA 19510
February 28, 2019

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MAR 18 2019

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

Honorable Jeffrey Watson
Administrative Law Judge
Pennsylvania Public Utility Commission
301 5th Avenue, Suite 220
Pittsburgh, PA 15222

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

Dear Judge Watson:

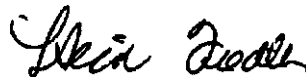
As required by your February 14, 2019 order, I am providing the following status report for my Formal Complaint C-2018-3003642. I have filed a Second Amended Formal Complaint, dated February 28, 2019. The Second Amended Complaint addresses serious safety issues and un-resolved property damage totally \$7,469.78 that was caused by Metropolitan Edison Company. The Second Amended Complaint also respectively requests an amended litigation schedule including an additional 60 days for discovery.

My Answer to Metropolitan Edison Company's Motion to Dismiss was filed on February 25, 2019.

A copy of this report is being furnished to Tori Giesler, Esq, First Energy Services Company, in accordance with the attached Certificate of Service.

If you have any questions regarding my Second Amended Complaint, please contact me. Thank you for your attention to this matter.

Very truly yours,



Heidi Fiedler

Enclosure

cc: Tori Giesler, Esq

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Heidi Fiedler

v.

Metropolitan Edison Company

:
:
:
:
:

C-2018-3003642

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true and correct copy of Complainant's Status Report 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:

Tori Giesler, Esq

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

Hon. Jeffrey A. Watson

**Administrative Law Judge
Pennsylvania Public Utility Commission
301 5th Avenue, Suite 220
Pittsburgh, PA 15222**

Dated: February 28, 2019



**Heidi Fiedler
432 E. Wesner Rd
Blandon, PA 19510**

EXHIBIT 2

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PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

U.S. Postal Service™
CERTIFIED MAIL® RECEIPT
Domestic Mail Only

For delivery information, visit our website at www.usps.com™

OFFICIAL USE

0529 7998 0000 8631 6250
7017 0660 0000 8631 6250

Certified Mail Fee	\$3.50
Extra Services & Fees (check box, add fee)	\$2.80
<input type="checkbox"/> Return Receipt (hardcopy)	\$0.00
<input type="checkbox"/> Return Receipt (electronic)	\$0.00
<input type="checkbox"/> Certified Mail Restricted Delivery	\$0.00
<input type="checkbox"/> Adult Signature Required	\$0.00
<input type="checkbox"/> Adult Signature Restricted Delivery	\$0.00
Postage	\$1.60
Total Postage and Fees	\$7.90

0210
Sdsn 11
Postmark Here
FEB 28 2019
PITTSBURGH PA

Sent to: **HON. JEFFREY WATSON, PA PUC**
Street and Apt. No. or PO Box No.
301 5th AVE, SUITE 220
City, State, ZIP+4®
PITTSBURGH, PA

PS Form 3806, April 2015 PSN 7530-02-000-6047 See Reverse for Instructions

SENDER: COMPLETE THIS SECTION		COMPLETE THIS SECTION ON DELIVERY	
<ul style="list-style-type: none"> Complete items 1, 2, and 3. Print your name and address on the reverse so that we can return the card to you. Attach this card to the back of the mailpiece, or on the front if space permits. 		<p>A. Signature <i>[Signature]</i> <input type="checkbox"/> Agent <input type="checkbox"/> Addressee</p> <p>B. Received by (Printed Name)</p> <p>C. Date of Delivery 3-4-19</p> <p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes <input type="checkbox"/> No If YES, enter delivery address below:</p>	
<p>1. Article Addressed to:</p> <p>HON. JEFFREY WATSON PA PUC 301 5th AVE, SUITE 220 PITTSBURGH, PA 15222</p> <p>9590 9402 4143 8092 5854 98</p>		<p>3. Service Type</p> <p><input type="checkbox"/> Adult Signature <input type="checkbox"/> Priority Mail Express® <input type="checkbox"/> Adult Signature Restricted Delivery <input type="checkbox"/> Registered Mail™ <input checked="" type="checkbox"/> Certified Mail® <input type="checkbox"/> Registered Mail Restricted Delivery <input type="checkbox"/> Certified Mail Restricted Delivery <input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> Collect on Delivery <input type="checkbox"/> Signature Confirmation™ <input type="checkbox"/> Collect on Delivery Restricted Delivery <input type="checkbox"/> Signature Confirmation Restricted Delivery <input type="checkbox"/> Insured Mail <input type="checkbox"/> Signature Confirmation Restricted Delivery (over \$500) <input type="checkbox"/> Insured Mail Restricted Delivery (over \$500)</p>	
<p>2. Article Number (Transfer from service label)</p> <p>7017 0660 0000 8631 6250</p>		<p>Domestic Return Receipt</p>	
<p>PS Form 3811, July 2015 PSN 7530-02-000-0053</p>			

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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

SECOND AMENDED COMPLAINT

I. INTRODUCTION

Pursuant to Section 701 of the Public Utility Code, 66 Pa. C.S. § 701 and Sections 5.91, and 1.81 of the Commission's Regulations, 52 Pa. Code §§ 5.91 and 1.81, Complainant in the above-captioned matter respectfully submits this Second Amended Complaint. This submittal further amends the Formal Complaint filed with the Pennsylvania Public Utility Commission ("PUC" or "Commission") on or about July 23, 2018 and the Amended Complaint, filed with the Commission on or about November 5, 2018. In support of her Second Amended Complaint, Complainant sets forth the following.

1. Complainant is:

Heidi Fiedler
432 E. Wesner Road
Blandon, PA 19510
(610) 944-9013

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PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

2. Respondent is Metropolitan Edison Company ("Company"), an Electric Distribution Company ("EDC"), regulated by the Commission.

3. Complainant is an electric customer of the Company receiving residential service at the address above.

II. REASON FOR COMPLAINT

4. On or about July 13, 2018, Complainant received from Company a 10-day shut-off notice threatening to cut off service to Complainant's residence on July 23, 2018. The shut-off notice is attached as Exhibit A.
5. The shut-off notice claimed that the reason for the threatened termination was Complainant's failure to contact Company to install a smart meter.
6. Complainant is extremely sensitive to Electro Magnetic Field Radiation (EMF) radiation.
7. Exposure to EMF radiation is known to cause various medical conditions, including cancer.
8. Wireless smart meters are known to emit indeterminate amounts of EMF radiation.
9. Complainant requested that Company abstain from installing a smart meter at her residence because the smart meter would adversely affect her.
10. On July 24, 2018, the Wall Street Journal (WSJ) reported that the Department of Homeland Security stated that Russian hackers have penetrated the control rooms of numerous US electric utilities and some utilities are unlikely to be aware of the cyber attacks. The WSJ article is attached as Exhibit B.
11. In Company's 2018 Annual Progress Report Smart Meter Technology Procurement and Installation Plan ("Report") dated August 1, 2018, Company states on page 3, "No major vulnerabilities were identified by SecureState." regarding cyber security. No definition of a "major vulnerability" is provided, which indicates that other vulnerabilities are known or suspected to exist. Other vulnerabilities could include weaknesses that would allow hackers to access smart meters at Company's customers' residences. The first three pages of this Report are attached as Exhibit C.

12. The Public Utility Code and the Commission's regulations require that regulated utilities such as the Company "furnish and maintain adequate, efficient, safe and reasonable service and facilities." 66 Pa .C.S. § 1501; 52 Pa. Code § 57.194.

13. The Public Utility code and the Commission's regulations further require that Company make "all repairs, changes alterations, substitutions, extensions, and improvements in or to such service and facilities shall be necessary or proper for the accommodation, convenience, and safety of its patrons, employees, and the public." 66 Pa .C.S. § 1501; 52 Pa. Code § 57.194.

14. Company's installation of a smart meter at Complainant's home would constitute a violation of Section 1501 of the Public Utility Code and Section 57.194 of the Commission's regulations because it would create unsafe and unreasonable service for Complainant, a Company customer.

15. Company allowed its electrical equipment on Complainant's property to severely deteriorate. The connector at the top of the pole was listing at a 45 degree angle and in danger of falling off and dropping live electrical lines in to the pond and on the grounds. A picture of this pole is attached as Exhibit D.

16. On October 17, 2018, Company's contractors removed a highly deteriorated Company pole from Complainant's property.

17. While removing the rotted pole and installing a new pole, Company's contractors drove throughout Complainant's property with three different trucks and created approximately 800 feet of ruts and other damage to Complainant's property.

18. Although Company's contractor indicated to Complainant that Company would promptly send a representative to review the property damage, no one contacted Complainant.

19. Complainant then called Company to complain on November 30, 2018. On December 6, 2018, Complainant received an email that Company would send a "lineman" to review damage. However, Complainant did not receive any communication from a lineman or any other Company representative.

20. Next, Complainant sent a letter dated December 29, 2018 to Company regarding the property damage. A copy of the letter is attached as Exhibit E.

21. Since Company had made no effort to repair the property damaged caused by Company's contractors, Complainant contacted Riverview Tree & Landscaping for a quote to repair the damage. A copy of the this quote is attached as Exhibit F.

22. Company allowed its equipment to dangerously deteriorate and created a very unsafe condition on Complainant's property, which is a violation of Section 1501 of the Public Utility Code and Section 57.194 of the Commission's regulations.

III. RELIEF SOUGHT

23. Complainant respectfully requests the Commission to compel Company to abide by the requirements of Section 1501 of the Public Utility Code and Section 57.194 of the Commission's regulations to provide safe and reasonable service to Complainant.

24. Complainant respectfully requests the Commission to order Company to retain a certified independent engineering firm to perform a company-wide inspection of Company's entire electrical delivery system and equipment to ensure compliance with all safety codes and Commission regulations and promptly issue a report to the Commission.

25. Complainant respectfully requests the Commission to order Company to pay \$7469.78 to Complainant to cover the cost of repairs to her property caused by Company's contractor.

26. Complainant respectively requests the Commission to grant an amended litigation schedule that would provide 60 days of additional discovery.

27. Complainant respectively requests the Commission compel Company to cease and desist from any attempts to install a wireless smart meter at Complainant's premises, as such an action is a violation of Section 1501 of the Public Utility Code and Section 57.194 of the Commission's regulations as they pertain to Complainant's health and safety concerns from EMF radiation.


28. In the alternative, and pursuant to 52 Pa. Code § 1.91, Complainant respectfully requests the Commission to order the waiver of any rule, regulation or Commission Order that the Commission believes requires Company to deploy a wireless EMF-emitting meter at the Complainant's premises.

29. Complainant respectively requests the Commission to order a comprehensive independent investigation in to the cyber security of Company's entire infrastructure, including computer networks and system communication systems.

IV. CONCLUSION

Based on the foregoing, Complainant respectfully requests that the Commission sustain her Formal Complaint and issue an Order granting the relief requested and any other remedy that the Commission deems just and appropriate.

Respectively submitted,


Heidi Fiedler
432 E. Wesner Rd
Blandon, PA 19510

Dated: February 28, 2019

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Heidi Fiedler :
 :
 v. : **C-2018-3003642**
 :
Metropolitan Edison Company :

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true and correct copy of Complainant's Second Amended Complaint 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:

Tori Giesler, Esq

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

Hon. Jeffrey A. Watson

**Administrative Law Judge
Pennsylvania Public Utility Commission
301 5th Avenue, Suite 220
Pittsburgh, PA 15222**

Dated: February 28, 2019



**Heidi Fiedler
432 E. Wesner Rd
Blandon, PA 19510**

432 E. Wesner Rd
Blandon, PA 19510
February 28, 2019

Rosemary Chiavetta
Secretary
Pennsylvania Public Utility Commission
400 North Street 2ND Floor
Harrisburg, PA 17120

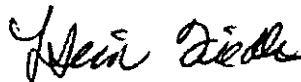
Heidi Fiedler v. Metropolitan Edison Company
Docket No. C-2018-3003642

Dear Ms. Chiavetta:

Please find enclosed Complainant's Second Amended Complaint.
I am also serving copies to the Honorable Tori Giesler of First Energy Services
Company and to the Honorable Jeffrey Watson, Administrative Law Judge,
Pennsylvania Public Utilities Commission.

Thank you for your attention to this matter.

Very truly yours,



Heidi Fiedler

Enclosures

cc: The Honorable Jeffrey Watson, Pennsylvania Public Utility Commission
The Honorable Tori Giesler, First Energy Services Company

July 13, 2018

HEIDI F FIEDLER
432 E WESNER RD
BLANDON PA 19510

10-DAY NOTICE

RE: Service Address: 432 E. Wesner Rd. Blandon, PA 19510
Account Number: 100117454726

Dear Heidi F. Fiedler:

We have made several attempts to contact you and make arrangements to install a new smart meter at the service address shown above. As of the date on this letter, we have not been able to schedule a time with you to install the new meter.

It is important to note that the company is required by Pennsylvania law (Act 129) to install a smart meter for all of our Pennsylvania customers. You should also be aware that our tariff permits us to have access to your property for electric service-related matters, including exchanging the meter. As a result, you are required to allow our installers access to the electric meter so that we can safely install the new smart meter.

Unless you contact us by July 23, 2018 to replace the meter, the electric service for the account listed above will be subject to being shut off. In the event your service is shut off, the new meter must be installed at the premises before service will be restored.

Please contact us immediately by calling 1-855-344-3400 (Monday through Friday, 8:00 a.m. to 6:00 p.m.) to make the necessary arrangements to avoid the shut off of your electric service.

Sincerely,

Pennsylvania Meter Deployment

THE WALL STREET JOURNAL. EXHIBIT B

Russian Hackers Reach U.S. Utility Control Rooms, Homeland Security Officials Say

Blackouts could have been caused after the networks of trusted vendors were easily penetrated



Officials of the Department of Homeland Security said hackers have reached the control rooms of U.S. electric utilities. PHOTO: ANDREW HARRER/BLOOMBERG NEWS

By Rebecca Smith

July 23, 2018 7:21 p.m. ET

Hackers working for Russia claimed “hundreds of victims” last year in a giant and long-running campaign that put them inside the control rooms of U.S. electric utilities

Once inside the vendor networks, they pivoted to their real focus: the utilities. It was a relatively easy process, in many cases, for them to steal credentials from vendors and gain direct access to utility networks.

EXHIBIT B

Then they began stealing confidential information. For example, the hackers vacuumed up information showing how utility networks were configured, what equipment was in use and how it was controlled. They also familiarized themselves with how the facilities were supposed to work, because attackers “have to learn how to take the normal and make it abnormal” to cause disruptions, said Mr. Homer.

Their goal, he said: to disguise themselves as “the people who touch these systems on a daily basis.”

DHS is conducting the briefings—four are planned—hoping for more industry cooperation. One thing the agency is trying to learn is whether there are new infections, and whether the Russians have figured out ways to defeat security enhancements like multifactor authentication.

In addition, DHS is looking for evidence that the Russians are automating their attacks, which investigators worry could presage a large increase in hacking efforts. “To scale, they’re eventually going to have to automate,” Mr. Homer said.

“You’re seeing an uptick in the way government is sharing threats and vulnerabilities,” said Scott Aaronson, a cybersecurity expert for Edison Electric Institute, the utility industry trade group. He said information sharing and penetration detection have gotten much better since the Dragonfly attacks began.

It isn’t yet clear whether the hackers used their access to prepare the battlefield for some future, devastating blow, investigators said. For example, many experts fear that a skilled technician could use unfettered access to change some equipment’s settings. That could make them unreliable in unexpected ways, causing utility engineers to do things that would result in extensive damage and potentially lengthy blackouts.

where they could have caused blackouts, federal officials said. They said the campaign likely is continuing.

EXHIBIT B

The Russian hackers, who worked for a shadowy state-sponsored group previously identified as Dragonfly or Energetic Bear, broke into supposedly secure, “air-gapped” or isolated networks owned by utilities with relative ease by first penetrating the networks of key vendors who had trusted relationships with the power companies, said officials at the Department of Homeland Security.

“They got to the point where they could have thrown switches” and disrupted power flows, said Jonathan Homer, chief of industrial-control-system analysis for DHS.

DHS has been warning utility executives with security clearances about the Russian group’s threat to critical infrastructure since 2014. But the briefing on Monday was the first time that DHS has given out information in an unclassified setting with as much detail. It continues to withhold the names of victims but now says there were hundreds of victims, not a few dozen as had been said previously.

It also said some companies still may not know they have been compromised, because the attacks used credentials of actual employees to get inside utility networks, potentially making the intrusions more difficult to detect.

Experts have been warning about the Russian threat for some time.

“They’ve been intruding into our networks and are positioning themselves for a limited or widespread attack,” said Michael Carpenter, former deputy assistant secretary of defense, who now is a senior director at the Penn Biden Center at the University of Pennsylvania. “They are waging a covert war on the West.”

Russia has denied targeting critical infrastructure.

Mr. Homer said the cyberattack, which surfaced in the U.S. in the spring of 2016 and continued throughout 2017, exploited relationships that utilities have with vendors who have special access to update software, run diagnostics on equipment and perform other services that are needed to keep millions of pieces of gear in working order.

The attackers began by using conventional tools—spear-phishing emails and watering-hole attacks, which trick victims into entering their passwords on spoofed websites—to compromise the corporate networks of suppliers, many of whom were smaller companies without big budgets for cybersecurity.

Before the
PENNSYLVANIA PUBLIC UTILITY COMMISSION

**Metropolitan Edison Company
Pennsylvania Electric Company
Pennsylvania Power Company
West Penn Power Company**

**Docket No. M-2013-2341990
Docket No. M-2013-2341994
Docket No. M-2013-2341993
Docket No. M-2013-2341991**

**2018
ANNUAL PROGRESS REPORT
SMART METER TECHNOLOGY PROCUREMENT
AND INSTALLATION PLAN
(For the Twelve-Months Ended June 30, 2018)**

August 1, 2018

I. INTRODUCTION

Pursuant to the Implementation Order entered by the Pennsylvania Public Utility Commission ("Commission") on June 24, 2009, at Docket No. M-2009-2092655,¹ Metropolitan Edison Company ("Met-Ed" or "ME"), Pennsylvania Electric Company ("Penelec" or "PN"), Pennsylvania Power Company ("Penn Power" or "PP") and West Penn Power Company ("West Penn" or "WPP") (collectively, the "Companies") submit this smart meter progress report for the twelve-months ended June 30, 2018 ("Current Reporting Period"). This report provides an update on events that have taken place since the Companies' last report submitted on August 1, 2017, at Docket Nos. M-2013-2341990, M-2013-2341991, M-2013-2341993 and M-2013-2341994, which covered the twelve-months ended June 30, 2017 ("Prior Reporting Period").

II. DEPLOYMENT

The Companies' Revised Deployment Plan² ("Approved Deployment Plan") continues to be executed as part of the Commission-approved Smart Meter Implementation Plan ("SMIP"). Consistent with this plan, the eighteen-month Solution Validation Stage was successfully completed in Penn Power's service territory on December 31, 2015. Full-scale deployment of smart meters in the other Companies' service territories began in 2016 and continues in 2018. As of June 30, 2018, the project remains on schedule and within budget.

The Companies made significant progress during the Current Reporting Period. At the end of the Prior Reporting Period, a total of 1.06 million meters had been installed. As of June 30, 2018, the Companies have completed the installation of approximately 1.65 million smart meters in the Companies' service territories. Penn Power's end-to-end smart meter solution is completed, and the smart meter infrastructure continues to be built out in the Penelec, West Penn and Met-Ed service territories. While the end-to-end solution meets all fifteen functionality requirements established either through Act 129 or the Commission's Implementation Order, the following requirements have not yet been fully implemented as of June 30, 2018, although significant progress has been made during the Current Reporting Period: i) Real Time Pricing/Time of Use Programs (expected completion in the first quarter of 2019); and (ii) Net Metering Capabilities (expected in the second quarter of 2019).

Current Deployment:

The Companies' deployment of smart meters continues to be on schedule consistent with the timelines set forth in the Companies' Approved Deployment Plan. All installed smart meter systems are functioning properly, with communication and estimated read rates consistent with expectations. Over one million smart meters have been certified for billing in the Companies' service territories, thus allowing automated billing to commence and providing those customers with access to their energy usage through the internet portal discussed below.

¹ *In re Smart Meter Procurement and Installation*, Docket No. M-2009-2092655 (Order entered June 24, 2009) ("Implementation Order"), p. 14.

² The Commission approved this plan in the case of the *Joint Petition of Metropolitan Edison Company, Pennsylvania Electric Company, Pennsylvania Power Company and West Penn Power Company For Approval of Their Smart Meter Deployment Plan*, Docket Nos. M-2013-2341990, M-2013-2341991, M-2013-2341993, and M-2013-2341994 (Order entered June 25, 2014).

As of June 30, 2018, approximately 1.65 million meters and, combined, 4,483 connected grid routers ("CGRs") and range extenders ("REs"), along with the related infrastructure, have been deployed in the Companies' service territories as shown below:

	<u>Meters (000s)</u>	<u>CGRs</u>	<u>REs</u>
Met-Ed	383	289	160
Penelec	557	629	1,947
Penn Power	168	116	502
West Penn	<u>541</u>	<u>505</u>	<u>335</u>
Total	1,649	1,539	2,944

For a summary of additional smart meter metrics³ and cumulative costs as of June 30, 2018, see attached Exhibit A.

During the Current Reporting Period, the Companies continued to address the disputed installations and 60 Amp round meter socket repair issues that were both discussed in the Companies' last annual progress report. They also conducted a cybersecurity assessment during the Current Reporting Period. Below is an update on the progress made in each of these areas:

Disputed Installations: After the completion of a successful pilot study in Penn Power's service territory, the Companies implemented an effective, proven procedure for resolving disputed installations system-wide during Full-Scale Deployment in each of the Companies' service territories. With almost 1.65 million meters installed, there have been approximately 5,400 disputed installations since project inception. Thus far, more than 5,000 disputes have been positively resolved in favor of smart meter installation. As of June 30, 2018, there are 71 formal complaints and 29 informal complaints pending before the Commission. The deployment staff is currently working with approximately 250 additional customers through the outreach and educational process implemented as part of the disputed installation procedure.

60 Amp Round Meter Socket Repairs: Prior to Full-Scale Deployment, the Companies estimated approximately 75,000 60 amp round meter sockets throughout the Companies' service territories were in need of repair at an estimated cost of approximately \$ 52.5 million. The costs for this repair work exceeded the costs originally estimated for maintenance/repair work included in the Approved Deployment Plan. The Companies informed the Commission and other customer advocates of this issue and, on June 27, 2016, the Companies submitted a letter to the Secretary of the Commission providing public notice of the same to all interested parties. No party filed comments or expressed opposition in response to the Companies' letter.

³ On April 9, 2015, the Commission approved a Joint Petition for Partial Settlement in each of the Companies' respective base rate cases. See *Pennsylvania Public Utility Commission v. Metropolitan Edison Company*, Docket No. R-2014-2428745 (Order entered April 9, 2015); *Pennsylvania Public Utility Commission v. Pennsylvania Electric Company*, Docket No. R-2014-2428743 (Order entered April 9, 2015); *Pennsylvania Public Utility Commission v. Pennsylvania Power Company*, Docket No. R-2014-2428744 (Order entered April 9, 2015); and *Pennsylvania Public Utility Commission v. West Penn Power Company*, Docket No. R-2014-2428742 (Order entered April 9, 2015) (hereinafter collectively, "2014 Rate Cases"). As part of this settlement, the Companies agreed to provide certain information related to smart meter deployment, which is also included in Exhibit A and denoted by an asterisk (*).

As of June 30, 2018, approximately 32,675 round meter sockets have been repaired. It is anticipated that all remaining round meter sockets identified to date will be repaired by 2020.

Cybersecurity: The Companies engaged SecureState to conduct a vulnerability assessment, identify risks, and provide recommendations for the AMI infrastructure. Specifically included in this assessment were the following:

- 4G Connected Grid Router (CGR)
- 4G direct connect to meters (meters that will not connect to a CGR)
- Testing for device vulnerabilities
- Table - Top exercise to explore various forms of potential cyber attacks.

No major vulnerabilities were identified by SecureState.

Upgrades/Enhancements to the end-to-end Smart Meter Infrastructure: In order to comply with vendor support requirements and to ensure that the Companies' cybersecurity is up to date, the Companies also made numerous upgrades and enhancements to the end-to-end smart meter IT infrastructure by, among other things, upgrading systems, installing patches and replacing end of life equipment.

432 E. Wesner Rd
Blandon, PA 19510
December 29, 2018

Met-Ed
76 S. Main St.
A-RPC
Akron, OH 44308-1890

Re: Account Number 100 117 454 726
Damage Claim 342165264

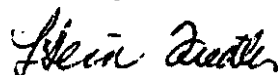
Dear Sir or Madam:

On October 17, 2018, a Met Ed contractor replaced a Met Ed pole on my property. During the removal of the old pole and the installation of the new pole, over 500 feet of ruts were created on my lawns. Some of these ruts are four inches deep. These ruts were created by the Met Ed contractor driving on my lawns with three different trucks and trailers. The contractor told me that a Met Ed representative would contact me about repairing the ruts; however, when no one did, I called Met Ed directly. On December 6, 2018, I received an email from Linda Rosecrans indicating that a Met Ed representative would contact me about setting a meeting to review the damages and establish a date for repairing the damages.

As of today, I have not received any follow up communication from Met Ed. No one has contacted me to set up a meeting and discuss the needed repairs. Over two months after the Met Ed contractor created the damage to my lawn, the damage has not been repaired.

I am requesting Met Ed to immediately contact me at 610-944-9013 to set up a meeting to review the damages and develop a satisfactory plan for the repairs.

Sincerely,



Heidi Fiedler



3049 Pricetown Road Temple, PA 18349 TREE & LANDSCAPING, INC.

www.riverviewtree.com

January 22, 2019

Heidi Fiedler
432 East Wessner Road
Blandon, PA 19510

phone 717 475 8062
email heidi25@reagan.com

Riverview Tree & Landscaping, Inc. is pleased to quote the following:

Item One

Restore disturbed/rutted lawn between pond and horse fence, approximately 420' in length, from far end of fence to driveway

Amend existing ground within area of disturbance with fresh topsoil prior to seeding

Smooth out ruts and high/low spots with a Harley rake

Remove any large rocks and excess debris

Fine grade with hand rakes

Sew with Landscaper's seed mix, lime and 10-10-410 fertilizer

Cover with straw

Materials, Labor & Equip. \$ 4,248.54

Item Two

Restore disturbed/rutted lawn on both sides of driveway along length of horse fence, approximately 400' in length

Add fresh topsoil as needed to bring lawn up to height of driveway top and grade to blend with existing

Sew with Landscapers seed mix, lime and 10-10-10 fertilizer

Cover with straw

Remove excess dirt/mud from driveway

* Tire marks/prints may remain

Materials, Labor & Equip. \$ 3,221.24

Total for Lawn Restoration \$ 7,469.78

Permits, if needed, are the sole responsibility of the owner.

All work, start and completion, is contingent upon weather conditions. Proposals are processed in the order they are received.

Our company strives for quality work to insure proper grading and a lush green lawn. Proper watering is very important. The care and maintenance of a new lawn is the owner's responsibility. Regrettably, we cannot be responsible for "washouts" or "Acts of God"

Payment will be made as follows: 100% upon receipt of invoice-completion of work. There will be a 2% per month interest charge on all unpaid balances.

Thank you for the opportunity of submitting this proposal. Please sign and date below if proposal is accepted as outlined above and return one copy. Any changes or additions to this contract will be billed/paid additionally on a time and materials basis. This proposal is valid for 30 days, after 30 days Riverview reserves the right to adjust pricing.

Sincerely,

Aleks Salks, Estimator
cc: Diane K. Salks, President
3049 Pricetown Rd,
Temple PA 19560
610-929-5049
610-929-5806 FAX
www.riverviewtree.com

Riverview requires all property owners to sign contract to have work performed. If anyone, other than the owner listed, is also a principal with the property, his or her name must be listed and he or she must sign this agreement. I (we) accept this proposal as outlined on the above pages and agree to the terms of payment as specified.

Signature: _____ Date: _____
Printed name: _____

Signature: _____ Date: _____
Printed name: _____

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Heidi Fiedler :
 :
 v. : **C-2018-3003642**
 :
Metropolitan Edison Company :

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true and correct copy of the aforementioned document 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:

Tori Giesler, Esq

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

Hon. Jeffrey A. Watson

Administrative Law Judge
Pennsylvania Public Utility Commission
301 5th Avenue, Suite 220
Pittsburgh, PA 15222
(Service by Overnight mail)

Dated: March 18, 2019




RECEIVED

MAR 18 2019

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU


Heidi Fiedler
432 E. Wesner Rd
Blandon, PA 19510

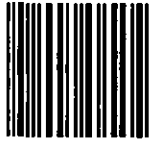
 Ms Heidi Fiedler
Blandon PA
432 E Wesner Rd
Blandon, PA 19510

CERTIFIED MAIL



7017 0660 0000 8631 6243

 1000



17120

U.S. POSTAGE PAID
FCM LG ENV
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19510
MAR 18, 19
AMOUNT
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MS. ROSEMARY CHIAVETTA
SECRETARY
PA PUC
400 NORTH ST.
HARRISBURG, PA 1720