

200 Brook Hollow Road
Mount Pleasant, PA 15666

March 28, 2019

VIA ELECTRONIC FILING

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

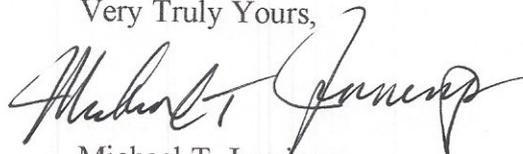
Re: Michael T. Jennings v. West Penn Power Company
Docket No. C-2018-3006031

Dear Secretary Chiavetta,

Enclosed for filing with the Commission are my identification of Factual Witnesses and Expert Witnesses and Summary of Expected Testimony. Laura Sunstein Murphy's testimony will be mailed to West Penn Power as Ms. Murphy's testimony is confidential and it contains protected HIPPA medical information of the witness, and must be maintained in a separately marked "confidential" folder. All copies of this report must be destroyed or returned to the witness after conclusion of this formal complaint process. This document has been served on West Penn Power as shown in the Certificate of Service.

Please contact me if you have any questions.

Very Truly Yours,



Michael T. Jennings

Ssj

Enclosures

CC: ALJ Watson
Certificate of Service

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

MICHAEL T. JENNINGS
Complainant

v.

WEST PENN POWER COMPANY
Respondent

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Docket No. C-2018-3006031

Date: March 28, 2019

**Michael T Jennings'
Identification of Factual and Expert Witnesses and Expected Testimony**

I received a copy of the Interim Order Revising the Litigation Schedule in this matter dated February 12, 2019. Paragraph 1 of that Order requires on or before March 29, 2019, any Party wishing to present factual testimony of any person other than Complainant must provide to the other Party in writing, the name and business address of that person and a written summary of the expected testimony of that person.

Paragraph 2 requires any Party wishing to present expert testimony (including but not limited to medical, technical, etc.) must provide to the other Party in writing, the name and business address of that expert and a written summary of the expected testimony of that witness.

I expect to call the following as factual witnesses in this matter:

Cece Doucette
Technology Safety Educator
31 Fatima Drive
Ashland, MA 01721

- A refresher on how FCC public radiation limits were set
- New science concluding wireless radiation is biologically hazardous at non-thermal levels
- Current federal priorities and investigations
- State-level advances
- Legal and financial risks
- Solutions for safe technology

Based on new facts, Ms. Doucette will present information which reveals reasons why it is not in the best interest of Pennsylvania ratepayers to pay to have toxic wireless radiation-emitting utility meters installed on homes, schools and places of work. Nor is it in the best interest of ratepayers to pay to have wireless communication facilities (WCFs) mounted by the utility and telecommunications companies on or near residences, schools, health care facilities, parks and other properties where the public spends its time. We should, in fact stop the 5G rollout, remove the toxic RF "smart" meters installed, and work with the industry to bring biologically safe technology to market before taking further steps to modernize the electric grid.

Laura Sunstein Murphy, PhD, Esquire (ret.)
1191 Telegraph Road
West Chester, PA 19380

This testimony report will be mailed to West Penn Power as it is confidential. It contains protected HIPPA medical information of the witness, and must be maintained in a separately marked "confidential" folder. All copies of this report must be destroyed or returned to the witness after conclusion of this formal complaint process.

I expect to call the following as an expert witness:

Erica Mallery-Blythe

Founder of PHIRE (Physicians' Health Initiative for Radiation and Environment)
Trustee Radiation Research Trust (RRT)
Medical Advisor Oceania Radiofrequency Scientific Advisory Association (ORSAA)
Field Cottage,
Moorby,
Lincs
PE22 7PL
UK

Dr. Erica Mallery-Blythe, is a UK trained medical doctor with a decade of experience within hospital medicine in multiple countries. Emergency Trauma Medicine is her area of expertise in hospital, and in training for this specialty she has a broad base of medical experience including surgery, anaesthesiology, obstetrics, paediatrics and intensive care (both neonatal and adult). She has worked in hospital emergency rooms, led trauma teams, taught on trauma medicine courses throughout the UK and abroad and was selected to instruct doctors on teaching within medicine for Advanced Trauma and Life Support (ATLS).

In 2008, she began researching biological effects of non-ionising radiation. This research included copious literature appraisal, conducting her own research via medical histories, medical examinations and provocation testing of those with Electromagnetic Hypersensitivity (EHS). She has provided expert witness statements regarding EHS, and been invited to discuss the public health concerns of radiation exposure at the highest political level both here in the UK, and in Europe. She has provided support for schools and parents who require advice to better protect the health of children and information and advice for doctors and their patients. Dr. Mallery-Blythe will provide insight on the increased health risk our family faces with the installation of a smart meter that emits RF radiation and how this will affect our existing medical conditions.

Respectfully Submitted,



Michael T. Jennings
Complainant

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

MICHAEL T. JENNINGS

Complainant

v.

WEST PENN POWER COMPANY

Respondent

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Docket No. C-2018-3006031

CERTIFICATE OF SERVICE

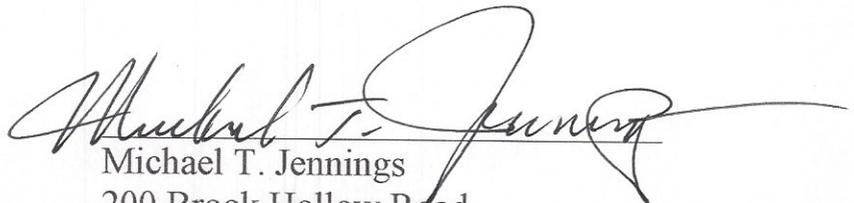
I, Michael T. Jennings, hereby certify that I have mailed a true copy of my Identification of Factual and Expert Witnesses and Summary of Factual and Expert Witness Testimony in the matter referenced above to Service List.

Also enclosed is Laura Sunstein Murphy's testimony. Ms. Murphy's testimony is confidential as it contains protected HIPPA medical information of the witness, and must be maintained in a separately marked "confidential" folder. All copies of this report must be destroyed or returned to the witness after conclusion of this formal complaint process.

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

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Dated: March 28, 2019



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