

March 28, 2019.

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PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

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

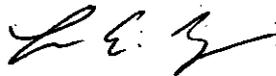
Re: Lauren Zonca v. Metropolitan Edison Company
Docket No. C-2019-3007961

Dear Secretary Chiavetta:

Enclosed please find the Rebuttal to the Answer and New Matter of Metropolitan Edison Company.
Please note that this Rebuttal contains a request for a complete hearing and a rejection of a prehearing conference.

Please contact me if you have any questions regarding this matter.

Sincerely,



Lauren E. Zonca

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BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

LAUREN ZONCA

v.

Docket No. C-2019-3007961

METROPOLITAN EDISON COMPANY

**REBUTTAL TO ANSWER AND NEW MATTER OF METROPOLITAN EDISON COMPANY
TO THE COMPLAINT OF LAUREN ZONCA**

1. Admitted.
2. Admitted
3. Admitted
4. The following information contains scientific articles and reports and are not merely the *Complainant's beliefs or opinions*.

The World Health Organization has declared all "radiofrequency electromagnetic fields" as Class 2B Possible Carcinogens. According to the Chair of the Committee Dr. Johnathan Samet, this is a broad category that includes wireless (i.e. cell phones, wifi, bluetooth, cordless phones, cell towers, smart meters, gaming consoles, etc).

The studies and reports listed below all testify to the harmful effects of electromagnetic fields which the smart meter generates (full documents can be found on the web).

- ICEMS (www.icems.eu) - the International Commission for Electromagnetic Safety published several resolutions that reviews many health effects of EMR other than heat related effect.
- European Parliament 2009 - Health concerns associated with electromagnetic fields
- COUNCIL OF EUROPE - "The potential dangers of electromagnetic fields and their effect on the environment " by the "COUNCIL OF EUROPE - Parliamentary Assembly" (6/05/2011) - <http://www.assembly.coe.int/Mainf.asp?link=/Documents/AdoptedText/ta11/ERES1815.htm>
- Russia - "The Russian National Committee on Non-Ionizing Radiation Protection (RNCNIRP) has published a new resolution entitled: "Electromagnetic Fields from Mobile Phones: Health Effect on Children and Teenagers" - <http://www.scribd.com/doc/55420788/Electromagnetic-Fields-from-Mobile-Phones-Health-Effect-on-Children-and-Teenagers>.
- INDIA - "REPORT OF THE INTERNAL MINISTERIAL COMMITTEE ON EMF RADIATION " - "Government of India, Ministry of Communications & Information Technology, Department of Telecommunications" - <http://www.dot.gov.in/miscellaneous/IMC%20Report/IMC%20Report.pdf>.
- ISRAEL - The environmental and health committee in the KNESSET (Israel parliament) called the government to adopt the recommendations of a technical committee to reduce and to prevent

exposure to electromagnetic radiation of students in schools to, due to the possible health effect of electromagnetic radiation might have on their

health - <http://norad4u.blogspot.com/2010/11/article-about-reduction-and-prevention.html>.

- National Institutes of Health Study Reveals Cell Phones Alter Brain Activity
- Santa Cruz County Health Department Report: Health Risks of Smart Meters
- Journal of Neuroscience- evidence for electro-sensitivity
- Public health implications of wireless technologies
- UC Nuclear Policy Lecturer Dan Hirsch Report on Smart Meter Emission Strength
- Assessment of Radiofrequency Microwave Radiation Emissions from Smart Meters
- American Academy of Envl. Medicine Recommends Patients Avoid Smart Meters
- Pregnant Women Exposed to Magnetic Fields Risk Obese Children
- Study: Health Symptoms Associated with Wireless Meters

5. No response required.

6. No previous protection from abuse was filed or granted.

7. No response required.

8. Not applicable.

9. Not applicable.

10. Not applicable.

11. No response required.

12. Admitted in part, denied in part.

13. This is a conclusion of law to which no response is required.

14. This is a conclusion of law to which no response is required.

15. Denied in part. The Complainant was not made aware that such a law had passed until a letter was received from Met-Ed in December 2018 by their admission, indicating that a Smart Meter would need to be installed.

16. Denied.

17. Denied. Act 129 was not initially mandatory and the law was capriciously changed to make it mandatory. Furthermore this is in violation of Title 66 Sect 1501/1502. Health and Safety violations. Act 129 is in violation of the Energy Policy Act of 2005 Statue 1252 HB2200 including but not limited to (f) (7) (2) (i) whereby smart meters were not mandatory.

18. Denied. Act 129 was not always deemed mandatory.

19. Denied. Complainant requests a complete hearing and rejects a prehearing conference.

Respectfully submitted.


Lauren Zonca
15 Sherman Road
Ottsville, Pennsylvania 18942
215-601-8706
Lezonca@gmail.com

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**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

LAUREN ZONCA
Complainant

v.

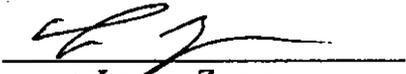
Docket No. C-2019-3007961

METROPOLITAN EDISON COMPANY
Respondent

VERIFICATION

I, Lauren Zonca, hereby state that the facts set forth above 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 the statements herein are made subject to the penalties of 19 Pa.C.S. § 4904

3/28/17
Date



Lauren Zonca

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**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

LAUREN ZONCA

v.

Docket No. C-2019-3007961

METROPOLITAN EDISON COMPANY

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the Rebuttal to the Answer and New Matter of Metropolitan Edison Company to the Formal Complaint of Lauren Zonca upon the individual(s) listed below, in accordance with requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

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

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
P.O. Box 3265
Harrisburg, PA 17105-3265

Copy to:

Lauren M. Lepkoski
Tori L. Giesler
FirstEnergy Service Company
2800 Pottsville Pike
P.O. Box 16001
Reading, Pennsylvania 19612-6001

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**PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU**

Dated: March 28, 2019



Lauren Zonca
15 Sherman Road
Ottsville, Pennsylvania 18942
215-601-8706
Lezonca@gmail.com

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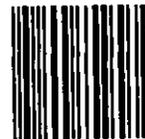
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Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
P.O. Box 3265
Harrisburg, PA 17105-3265

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