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APR - 4 2019

Willard and Elsbeth Sunstein
860 Cupola Road
Honeybrook, PA 19344

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

per request, resubmitting the reformatted filing of 24th, mailed 25th of March, 2019

VIA US POSTAL SERVICE, CERTIFIED MAIL, RETURN RECEIPT REQUESTED

Secretary
Pa. Public Utility Commission
P.O. Box 3265
Harrisburg, PA 17105-3265

Re: Willard and Elsbeth Sunstein v. PPL Electric Utilities Corporation
Docket No. C-2018-3000078

Dear Secretary Rosemary Chiavetta,

We are very grateful that Joyce Vigilanti from your office called us on Tuesday 2nd of April 2019 at 13:01. She informed us that our Exceptions filing of 25th March was not acceptable in the form submitted because of two formalities:

1. it did not include the original inked signatures, but signature copies as have been acceptable in all our efilings.
2. It was all made confidential.

Of course we were not aware of these formal requirements, or we would have worked to fulfill them. We were focused on following the guidance of your very informative letter regarding the requirements for filing an exceptions brief, but did not find these requirements there.

Joyce very kindly informed us that, would we refile in such manner as met these formalities, your department will try and make this refile acceptable as a filing of 25th March, 2019. I replied that it would not be possible for me to work on the day she called because we had to leave to a medical appointment and would be exhausted by the time we returned. Because of the urgency we understood from Joyce, even though it has been very over taxing on our health, we have worked to complete this and mail on Thursday, the 4th of April, on our way to another medical appointment.

We are very grateful for all you can do to accept our filing resubmitted to fulfill the additionally recently clarified requests.

Accordingly, we have adjusted the filing to meet the requirements by including two different copies.

One complete copy includes confidential sections highlighted in yellow. The other one is the redacted filing containing only the non confidential parts.

As requested, the original signatures in ink are included with the confidential filing. As a precaution, we also supplement them with new hand inked verifications regarding the nature of marking the confidential parts. Should you not need this please shred it.

For the redacted filing, we include a copy of the original signatures and the dates, but, as a precaution, we also supplement them with new hand inked verifications regarding the nature of the redactions. Should you not need this please shred it.

Of course, the redacted filing is the one for posting publicly and the non redacted filing, is to be kept confidential.

We have left all wording regarding the substance of our case exactly the same. The only changes in wording are with those very few word changes absolutely necessitated by the required format: words regarding confidential parts being indicated and how they are marked.

Enclosed for filing are the above mentioned two forms of our Exceptions Brief, the Exceptions of Willard and Elsbeth Sunstein to the Initial Decision of ALJ Elizabeth Barnes. Copies will again be provided as indicated on the Certificate of Service.

Sincerely,

Willard Sunstein 3.IV.19
Willard Sunstein Date

Elsbeth Sunstein 3.IV.2019
Elsbeth Sunstein Date

Enclosures:

- Certificate of Service
- Exceptions of Willard and Elsbeth Sunstein including Appendix
- Confidential Redacted Exceptions of Willard and Elsbeth Sunstein including Appendix
- Verifications

Willard and Elsbeth Sunstein

Docket No. C-2018-3000078

v.

PPL Electric Utilities Corporation

Certificate of Service

Willard Sunstein and Elsbeth Sunstein hereby certify that we are completing service of a true copy of our resubmitted as requested Exceptions to the Initial Decision of ALJ Elizabeth Barnes in the manner indicated below:

Concurrently mailed 4th of April, 2019

VIA US POSTAL SERVICE, CERTIFIED MAIL, RETURN RECEIPT REQUESTED
TO:

Secretary

Pa. Public Utility Commission

P.O. Box 3265

Harrisburg, PA 17105-3265

Commission's Office of Special Assistants

Pa. Public Utility Commission

P.O. Box 3265

Harrisburg, PA 17105-3265

(note: this is mailed as a file on CD-ROM as requested)

All other Parties concerned:

For PPL Electric

e/o Devin Ryan, Esquire,

Post & Schell, P.C.

17 North Second Street, 12th Floor

Harrisburg, PA 17101-1601

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PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

Willard Sunstein 3. IV '19

Willard Sunstein

Date

Elsbeth Sunstein 3. IV. 2019

Elsbeth Sunstein

Date

Willard and Elsbeth Sunstein
860 Cupola Road
Honeybrook, PA 19344

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PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

24th of March, 2019

To be mailed 25th of March, 2019

VIA US POSTAL SERVICE, CERTIFIED MAIL, RETURN RECEIPT REQUESTED

Secretary
Pa. Public Utility Commission
P.O. Box 3265
Harrisburg, PA 17105-3265

Re: Willard and Elsbeth Sunstein v. PPL Electric Utilities Corporation
Docket No. C-2018-3000078

Dear Secretary Rosemary Chiavetta:

Enclosed for filing are our Exceptions Brief, the Exceptions of Willard and Elsbeth Sunstein to the Initial Decision of AlJ Elizabeth Barnes. Copies will be provided as indicated on the Certificate of Service.

The Exceptions document including Appendix is marked **CONFIDENTIAL** and is **NOT** to be posted on the web.

Sincerely,

Willard Sunstein 24 III 2019
Willard Sunstein Date

Elsbeth Sunstein 24.III.2019
Elsbeth Sunstein Date

Enclosures:

Certificate of Service
Exceptions of Willard and Elsbeth Sunstein including Appendix
Verifications

Willard and Elsbeth Sunstein
v.
PPL Electric Utilities Corporation

Docket No. C-2018-3000078

Certificate of Service

Willard Sunstein and Elsbeth Sunstein hereby certify that we are completing service of a true copy of our Exceptions to the Initial Decision of ALJ Elizabeth Barnes in the manner indicated below:

Concurrently mailed 25th of March, 2019
VIA US POSTAL SERVICE, CERTIFIED MAIL, RETURN RECEIPT REQUESTED
TO:

Secretary
Pa. Public Utility Commission
P.O. Box 3265
Harrisburg, PA 17105-3265

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PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

Commission's Office of Special Assistants
Pa. Public Utility Commission
P.O. Box 3265
Harrisburg, PA 17105-3265
(note: this is mailed as a file on CD-ROM as requested)

All other Parties concerned:

For PPL Electric
c/o Devin Ryan, Esquire,
Post & Schell, P.C.
17 North Second Street, 12th Floor
Harrisburg, PA 17101-1601

Willard Sunstein 24 III 2019 Elsbeth Sunstein 24. III. 2019
Willard Sunstein Date Elsbeth Sunstein Date

Willard and Elsbeth Sunstein

v.

PPL Electric Utilities Corporation

**EXCEPTIONS of Willard and Elsbeth Sunstein
to Administrative Law Judge Barnes' March 5, 2019, Initial Decision
to dismiss our Complaint with Prejudice**

Preamble to Exceptions of Willard and Elsbeth Sunstein:

Willard and Elsbeth Sunstein are we, elderly individuals, dealing with debilitating health limitations, seeking to live a peaceful life on our own property,

PPL Electric Utilities Corporation: herein PPL

We have repeatedly offered to no avail that our case be put on hold in anticipation of mutually agreeable settlement, if PPL would but join hands with us in a petition to the PA PUC for an exception to their mandatory smartmeter implementation order. PPL's only claim why they cannot accommodate us is because they claim PA Act 129 forces them to reject all accommodation.

We apologize that this filing is not as organized and condensed and formatted as we would wish it to be.

We are completing this filing under stress of extreme pressure and have not time, nor energy to condense and polish it, but are doing our very best to get as much of the essential into it as we can under the circumstances since the decision was made. These circumstances include repeated bouts of [..Redacted.] lasting from 8 to 12 hours and confining Willard

[... .. Redacted]

It has gotten this far only by a health sacrificing last-ditch herculean effort in the face of dire necessity.

Introduction:

We are filing these exceptions to ALJ Elizabeth H Barnes' Initial Decision to dismiss our Formal Complaint with prejudice, because both of the our physical illnesses ever since PPL smart metered our neighborhood have greatly hampered our ability to function as we used to function.

This filing includes material we had earlier but which we were unable, due to health reasons, to formerly file before this time.

We are including Confidential HIPAA protected letters, from our attending physicians, the first dated September 10, 2018, covering the period from May 29, 2018 to September 10, 2018 for Elsbeth, whom Willard attended to day and night during most of this period. Elsbeth's medical condition necessitated 5 or more licensed professional appointments per week during this period. Her condition eventually stabilized from the concentrated cluster of doctor's visits for many months. However, she still requires one appointment per week to maintain her earlier level of health even up to this day.

The second physician letter is dated October 22, 2018, detailing Willard's responsibilities caring for his wife, Elsbeth, in her ongoing sickness, and the worsening of his [..Redacted.] condition. This letter requests that our responsibilities for attending to the PPL formal complaint matters be reduced a great deal because of the added stress on Willard's already over-stressed [..Redacted.], which condition started when our neighborhood was smart metered. Confronted with deaf ears regarding our repeated requests for rescheduling and continuance, we requested the letters earlier in anticipation of making formal filings that our ill health precluding our completing.

The last physician letter which was requested by the Court in the morning of January 23, 2019, to be furnished to the Court by noon, which was in negative fifteen minutes from the time our physician received the email, in order to reschedule the hearing in this matter. We obtained this medical excuse letter by calling and emailing our physician as soon as we received ALJ Barnes' email on January 23, 2019. Our physician would not write a medical letter without seeing Willard for an appointment. We did obtain an appointment with our physician on January 29, 2019, his first available appointment, and our physician did write a medical excuse letter that same day after examining Willard. This letter was then emailed to ALJ Barnes and opposing counsel. Judge Barnes makes no mention of the January 2019 medical letter which she and opposing counsel must have received long before she wrote her initial decision, wherein she writes on page 10 that we "did not produce a medical excuse." This can only be understood as true within the impossible to fulfill time-frame stipulated for such an excuse. We are elderly. We are not paid to fight for our rights. Even when our health is better, we do not have energies to get the computer up every day and tend to emails. Our friends know to call if they need to reach us quickly, because we do check voice messages every day. Elsbeth does not know how to use the computer and is dependent upon Willard for sending and receiving emails, for printing things out or showing her on the monitor when essential. Computer use is

confidential parts REDACTED

not just energy draining for us. Unless computer use is sufficiently limited, Willard gets [.... Redacted....]

We could earlier limit its use in a way that was somewhat manageable. PPL silently turning away from our above mentioned offer which could efficiently and amicably lead to a mutually satisfactory settlement, has forced upon us an inordinate unsustainable burden of computer use. We have a landline for which we went through the trouble of having a technician from our telephone company set to ring 12 times before voicemail, because we could not get their regular customer service to set it to more than 6 rings which was not long enough to be usually feasible for us to answer it.

We were forced to file a formal complaint with the PUC in February 2018, because we were so injured by the neighbors' smart meters, we knew we could definitely not tolerate the microwave and conductive emissions from a smart meter on our home, in addition. In our need, we tried to pursue a peaceful reasonable conversation with our utility, PPL. In a letter refusing this conversation, they claimed that PA act 129 required them to smart meter us, and they refused all conversation with us regarding the truth of what PA act 129 requires; they refused our needs for accommodation; they refused all conversation regarding risks which they, in response to our letter, claimed they were unaware of even though we had already informed them in that letter of various peer reviewed studies indicating risks, and they informed us that the only way we could get any possibility of any accommodation was by filing a formal complaint in PUC court against them. Thus compelled, we took this most uncomfortable step.

We sought and seek yet, what we understand is granted in Florida to all utility customers: that, with note from our doctor, we get to have analog meters on our home and our neighbors. As a gesture of good will, we offered and still offer to supply ANSI calibrated analog meters for us and our neighbors.

We take exception to several of the conclusions of law and procedural history listings in Judge Barnes' Initial Decision, because they are incomplete and inaccurate.

We take exception to the dismissal of our formal complaint with prejudice. We were not afforded either procedural due process, or substantive due process.

- 1. The History of the Proceeding omits all mention of ALJ Barnes' admission of DC lawyer Renner into our case, pro hac vice, the day after PPL lawyer filed the motion in our case. We take exception to Judge Barnes order granting PPL's motion to admit Renner into our case. We believe this was done in error. Judge Barnes granted this PPL motion on April 24, 2018, a few hours before our telephone conference. PPL had not given us service of its pro hac vice motion via**

confidential parts REDACTED

efiling, as we had signed up for. It was mailed. The PPL pro hac vice motion did not contain the required Notice to Plead. As artists we have significant cultural education, but no legal education and the lack of notice to plead was particularly damaging to us. Mr. Renner participated in the telephone conference representing PPL on April 24, 2018. We did not receive the defective pro hac vice filing until several days after Judge Barnes had granted it, which was also several days after our telephonic hearing with Renner present, even though we were supposed to have 20 days to object to this motion, under Pennsylvania law. When we researched this issue, we discovered that Judge Barnes had granted this pro hac vice motion in violation of many requirements of Pennsylvania law, she engaged in ex parte communications with PPL attorneys, and she had informed us that filing a formal complaint would not stop PPL from attaching a smart meter on our home, which would be a violation of PUC regulations, which she should be very familiar with (66 Pa Code Chapter 52, Section 56.151). In her second interim order she explained why she communicated with Mr. Renner well before any pro hac vice motion was made: "Mr. Renner had been co-counsel to Mr. Ryan in prior cases similar to the instant case, and I anticipated a motion for admission would be forthcoming." We take exception to this, because the fact that so many were filed before is evidence that an additional admission for Mr. Renner would not be permissible under PA pro hac vice rules. We filed our objections to the granting of PPL's pro hac vice motion on May 10, 2018. Our objection and motion filing of May 10, 2018, is posted on the PUC website under our case docket, and we incorporate it herein in its entirety by reference. After reviewing our objection to the granting of PPL's pro hac vice motion, Judge Barnes ruled, nevertheless, that she would not rescind her granting of pro hac admittance of DC lawyer Renner into our case. We cannot understand how this could be done except through total absence of fact checking and/or denial of facts known.

This was procedural due process error on the part of Judge Barnes.

After our filing of objections to the admittance of DC Attorney Renner in our formal complaint proceedings, further inquiries by other complainants, notably Dr. Alexia McKnight v PECO, docket number C-2017-2621057 and Mary Paul v PECO, docket number C-2015-2475355, have highlighted many more improprieties as to Mr. Renner's practice of law in Pennsylvania representing utility companies before the PUC without being admitted to practice in Pennsylvania. The nunc pro tunc motions attempting to remedy the situation after the fact, even though they were strangely accepted by judges of the PUC do not constitute a true remedy any more than in the case of an accident caused by an over-wide truck cargo without proper escort announcing it. Announcing it after the fact is simply too late. The damage is done. In fact, the situation is worse in our and other instances because it is comparable to inevitable damage from the passage of a truck with cargo too wide to be permitted travel even were the truck escorted.

confidential parts REDACTED

PPL may seek to claim the above irrelevant because Mr. Renner has been since admitted to the PA Bar. However, such admittance does not eliminate prior denial of substantive due process. Indeed we see this very admittance as further intensified denial of due process because it is clear to us that this admittance would be impossible under the law were previous procedural improprieties acknowledged in the necessary filings.

Additionally, and notably, because of the great stress on our health, and the time and energy required for us to respond to PPL's pro hac vice motion, and the enduring injustice of it being further sustained, time and energy was taken away and continued to be taken away from us to attend to other formal complaint prosecution requirements, violating our due process rights. One example of this is that under the stress of intolerable circumstances, Willard asked at the beginning of the telephonic prehearing conference for his comments about these health circumstances and his comments about his impossibility to be able to participate with full presence of mind, to be "off the record" when he meant to ask that it be "confidential".

2. In her Initial Decision, ALJ Barnes erred in dismissing our Complaint with prejudice and holding that our due process rights were not violated (page 8). We have repeatedly requested a revised schedule for us to prove our health claims regarding smart meter deployment on our property. It was in fact, our very own poor health which precluded us from complying with the schedule requested by PPL and implemented by ALJ Barnes to our severe detriment. This schedule had been determined during a prehearing conference that was imposed upon us, against our repeated passionate pleadings, when we were suffering from health issues including severe pain and in no position to be properly present and defend our rights. Here we paste an email chain in italics with bold emphasis added and include a read receipt from Judge Barnes:

Here is one of the last if not the last automatic confirmations that our emails were read by Judge Barnes... since approximately that time,(we haven't checked exactly when) she evidently turned off the automatic response that enabled us to see if she had read our emails.

Subject: Read: It is most unfortunately impossible to attend on July 10th

Date: Mon, 9 Jul 2018 16:57:06 +0000

From: Barnes, Elizabeth <EBARNES@pa.gov>

To: Will < redacted @net>

Your message

To: Barnes, Elizabeth

confidential parts REDACTED

Subject: It is most unfortunately impossible to attend on July 10th

Sent: Monday, July 9, 2018 12:10:27 AM (UTC-05:00) Eastern Time (US & Canada)

was read on Monday, July 9, 2018 12:57:04 PM (UTC-05:00) Eastern Time (US & Canada).

End of Read Message above _____

Here below, again in italics with bold emphasis added is above referenced read email, one of our emails urgently pleading to reschedule the prehearing conference. Please note that we, of our own accord, explicitly offered to supply a professional medical note validating our claims, but this went all unheeded:

Subject: It is most unfortunately impossible to attend on July 10th

Date: Mon, 9 Jul 2018 00:10:27 -0400

From: Will < redacted @net>

To: Barnes, Elizabeth <EBARNES@pa.gov>

CC: dryan@postschell.com <dryan@postschell.com>, Amy E. Hirakis (aehirakis@pplweb.com) <aehirakis@pplweb.com>, Lent, Garrett <GLent@PostSchell.com>, kldock@pplweb.com

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PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

Your Honor Elizabeth Barnes,

we apologized to you for being late in completing the memorandum. we were hoping to be able to finish this weekend the memorandum you have requested but we have been unable to complete it due to further debilitating health issues of myself and my wife.

We were hoping, to hear from you a favorable response to our urgent request to postpone the prehearing conference due to ongoing health issues of both of us who would not be able to participate meaningfully in a telephone conference with your Honor and PPL attorneys.

Please accept our further apologizes that we must write again now, because we have had and have such severe and continuing health issues since we last wrote, with more medical appointments over this weekend even, that it will not be possible to either complete the memorandum before the conference, nor for us to both attend the conference..

confidential parts REDACTED

We do feel it would be less stress for us, and for this reason also more conducive to justice were Your Honor to answer favorably our earlier sent urgent request to convert the prehearing conference into an exchange of emails instead, which would be a reasonable accommodation for our ongoing health issues.

while we do our very best to deal with the stresses of life, none compares in any way to the stress shoved upon us by PPL choosing to battle us rather than work together with us to accommodate our disabilities in such a manner that is a win win for all parties involved.

That said, we will, of course, continue to do our very best to work with you and fulfill all Your Honor's orders on as timely a basis as possible.

With further treatments, we hope to be strong enough physically to be able to complete our memorandum in a week or two.

we reaffirm again that we really wish to go forward here with all God's speed and will do our very best in that regard.

We hope that Attorney Ryan would see the light and join us in the most expedient way to speed things up. the most expedient way to speed things up is to work together with us instead of against us.

Because we are not lawyers and have neither the training nor other resources Attorney Ryan has at his disposal in a large and established firm of lawyers and the resources of a multi-billion dollar company to pay for it all, his attacks really stress and burden us with an enormous work load that harms our already vulnerable health and slows down the whole process.

Would PPL ever choose to work with us instead of against us, then this would speed up the process towards settlement enormously.

If Your Honor would so wish we will obtain for you a professional note confirming that it is not possible for us to both attend the conference on this tuesday july 10th.

we do very much appreciate your respecting our pressing essential health needs in this situation.

sincerely,

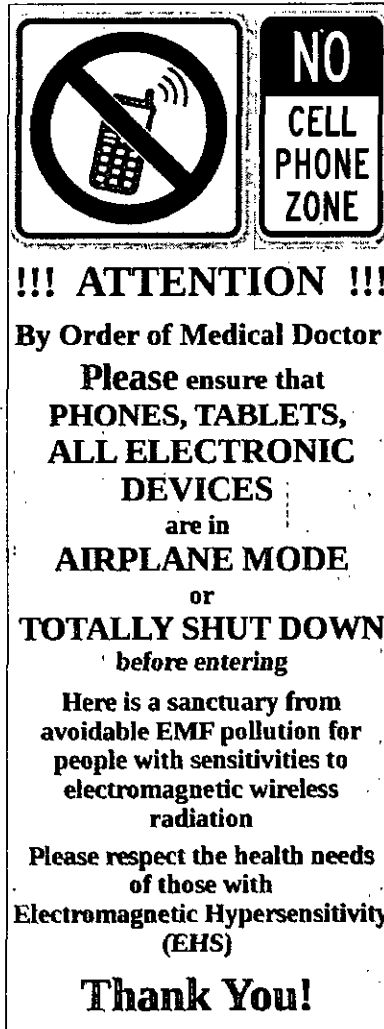
willard

----- End of Email above -----

Unfortunately, but quite understandably under the mounting imposed stress, in spite of all the medical treatment, our health continued to worsen rather than improve.

confidential parts REDACTED

3. In dismissing our formal complaint with prejudice, thus permitting PPL to place a microwave emitting device on our property (when our home is purposefully devoid of microwave emitting devices to protect our vulnerable health) this will result in forced exposure of us to an RF-emitting smart meter which would violate our substantive due process rights.
4. We have both a substantive due process claim, and a procedural due process claim. Forced radiofrequency (RF) exposure by PPL, as stated in our formal complaint, violates basic principles of respect for bodily integrity, violates our substantive due process rights, and cannot be justified by PPL or the PUC. As the United States Supreme Court has held: "the protections of substantive due process have for the most part been accorded to matters relating to marriage, family, procreation, and the right to bodily integrity." *Albright v. Oliver*, 510 U.S. 266, 272 (1994). See also *In re Cincinnati Radiation Litig.*, 874 F. Supp. 796, 810-11 (S.D. Ohio 1995) ("The right to be free of state-sponsored invasion of a person's bodily integrity is protected by the [constitutional] guarantee of due process."). PPL and all Pennsylvania utilities which are forcing smart meters on customers' properties with the full backing of the Pennsylvania PUC will expose us to RF exposure from a smart meter installed on our property.
5. Judge Barnes, by dismissing our formal complaint with prejudice, will mandate that we accept exposure to a wifi device at our home even though we object to this exposure, it is harmful to our health, and we never wanted any microwave emitting devices in our home. We have gone to the trouble of creating and laminating for permanency this sign in black, white and red displayed prominently on our front door:



6. The PUC has no right to force a paying electric customer who is elderly and disabled to accept RF exposure under these circumstances, i.e. by means of a device installed at our home, especially when safe and low or no cost alternatives to smart meters are available in forty states. See attached state smart meter opt out survey chart (Appendix I). The Commonwealth cannot force us to accept RF exposure by means of a device installed on our electrical socket on our property.

The Commission need not research this question if it decides, as it should, that Section 1501 requires an accommodation for people like us who are elderly and disabled, who cannot tolerate exposure to microwaves and live their lives accordingly.

7. We have raised an objection about smart meter installation based on medical recommendations. Three Confidential doctors' letters in the Appendix, parts of which are quoted in this Exceptions filing, state clearly that we cannot tolerate microwave energy safely.

confidential parts REDACTED

8. We always pay our electricity bills on time. We do not have room to include proof here, but this was kindly acknowledged by PPL in an exhibit that PPL sent to us in preparation for the hearing, a hearing for which an unrealistic schedule under our health circumstances precluded our effective preparation and a hearing we were unable to attend due to health reasons.
9. Under governing principles of statutory construction, the Commission should construe the Pennsylvania Act 129 statute so as to avoid any constitutional problems. Pennsylvania Law as set forth in the Statutory Construction Act of 1972 is clear that the General Assembly “does not intend a result that is absurd, impossible of execution, or unreasonable,” “and does not intend to violate the Constitution of the United States or of this Commonwealth” 1 Pa. C.S.A. § 1922(1), (3). *See also Snyder Bros. v. Pa. PUC*, 157 A.3d 1018, 1030 (Pa. Commw. Ct. 2017) (citing these provisions in a case of statutory interpretation).
10. Additionally, the PUC should acquiesce and admit that the PUC made an error in construing the words “in accordance with a depreciation schedule not to exceed fifteen years” when it made its own interpretation of the legislative intent of the Pennsylvania legislature in crafting Act 129 language, reflected in the PUC Smart Meter Procurement and Implementation Order of June 2009 (“Smart Meter Procurement Plan”). As discussed in our May 10, 2018 filing, the PUC Smart Meter Procurement Plan states:

“The Commission ‘believes’ that it was the ‘intent’ of the General Assembly to require all covered EDCs to deploy smart meters system-wide when it included a requirement for smart meter deployment ‘in accordance with a depreciation schedule not to exceed 15 years.’” (emphasis added). We note that this error of interpretation does serve to enormously increase smart meter deployment and thus capitalization expense, which unlike other expenses of the utility, under PA law justifies profits on these expenses not just in the year they are made, but for all years thereafter until such time as under a depreciation schedule the capital expenses depreciate to zero. Clearly the law was written with an intent to limit the length of time profits would be permitted on the smart meter deployment.

With all due respect refraining from speculation regarding motivation, it appears evident to us that the PUC implementation order by erroneously misconstruing “depreciation schedule” to mean “implementation schedule” and then crafting a disingenuous “belief” that this means mandatory smart meter installation in clear contradistinction to the repeated explicit presentation of those who wrote the law, that smart meters were made voluntary, that by this very irregular interpretation, the PA PUC significantly increased allowed revenues and profits for the utilities and thus for their own budget which is set by law to be a percentage of such revenue. We also note that the PA PUC has

confidential parts REDACTED

asked for an increased percentage of such revenue, and we wonder if this is to some extent related to extra expenses incurred by the PA PUC because of how the public has been affected by the implementation order. We and many others would like to know how many smart meter complaints there have been and what costs they have incurred both financially and otherwise for all parties concerned through actions of the PA PUC and utilities regarding the implementation order. We look forward to the day when the PA PUC decides to be more forthcoming in sharing its information with the affected public.

The Bazan v West Penn Power Company Docket C-2017-2640338, February 8, 2018 filing in response to West Penn Power Company's Answer and New Matter, the legal arguments of which are incorporated in their entirety herein by reference, additionally argues this issue clearly and concisely, of the PUC overreaching and ultra vires activity in its Smart Meter Procurement and Implementation Plan of 2009. The PA PUC and utility activities ever since have borne out this overreaching and *ultra vires* activity against disabled Pennsylvania residents.

11. Even if the PUC assumption of legislative intent expressed in its 2009 Smart Meter Procurement Plan would have been correct, "system wide deployment" never meant that there can be no exceptions from smart meter deployment for a disabled customer who is particularly sensitive to microwave and conductive emissions created by smart meters, and can suffer severe debilitating medical conditions, even death, if a smart meter is deployed on that customer's property.

We are such customers. In particular, Willard's [..Redacted.]has developed [..Redacted.] when exposed to microwave and other man made electromagnetic energy emissions emanating from smart meters. Willard's physician letter advises that he is particularly vulnerable to suffering a stroke if exposed. Even were the risks far less, that in no way would mean they were not significant. **There is no good reason why customers should be exposed to risks they (particularly with their doctor's recommendation) choose to avoid should such risks be easily avoided by reasonable accommodation requested of their utility. Indeed, regulation 1501 requires this.**

12. We have alleged ADA recognized disabilities both in our formal complaint and in many subsequent emails and telephone conferences. Although the PUC does not have jurisdiction to opine on ADA complaints, which are the sole province of the federal court system, we understand, the PUC is still required to furnish reasonable accommodation to complainants like us who are disabled. We would hope that if one of us were in the hospital with a stroke, PPL and Judge Barnes would have granted us a revised schedule. Her refusal to permit a revised schedule exposed Willard to a greatly enhanced risk of stroke, indeed, it felt to us like an assured stroke had we acquiesced to demands of an unjustly imposed hearing date. We had already suffered harm from giving in to the very forcefully imposed prehearing

confidential parts REDACTED

conference. Under the mounting pressures of our procedural rights continually infringed upon, Willard's [..Redacted.] and whole constitution had become in the days before the actual hearing even much more endangered.

But, most fortunately, we were not in the hospital and don't wish to land in one. We were and are still struggling to manage our health at home with a multitude of doctor's visits, resting at home to the extent possible. Elsbeth's health did not take a turn for the better until after October 2018. She is still seeing the doctor once every week and only sometimes every two weeks because of Willard's ill health precluding being able to drive her and additionally she being needed to care for him. These visits of Elsbeth are to prevent her health from deteriorating again. Willard's health has not stabilized yet, and Willard still struggles to recover a normal [..Redacted.] function on a regular basis, a struggle which has not let up ever since PPL smart metered our neighborhood, and has significantly worsened under the intense pressure of impossible to meet deadlines imposed upon us. This is documented in our doctor's letters dated October 22, 2018 and January 29, 2019.

13. While the PUC did make some small accommodations in postponing some of the schedule, the PUC ALJ Barnes did not ultimately recognize the extent of our disabilities and dismissed our complaint with prejudice solely because we were unable, due to our health conditions, to meet the tight deadlines imposed upon us to answer interrogatories, provide expert witness reports and to send our own interrogatory requests out and to prepare for our hearing, all of which require a functioning body and brain working extended hours at least average normal capacity at a computer. It is very hard for us emotionally to be confronted by a team of professional lawyers refusing to work with us, we who have no legal education except the unpleasant school of life education forced upon us in this instance. Under the compounded stress of having all our requests for rescheduling rejected and the pending hearing rapidly approaching, Willard's health deteriorated even further. Under the circumstances, the stress of the hearing itself would have been beyond intolerable.

If we had the means to afford to hire a lawyer to defend our rights to be free from harmful microwaves and conductive emissions caused by a smart meter on our home, we surely would have done so. But we are not in such a position. Nor could we obtain counsel to aid us in this pro bono, although we did look extensively. So, ultimately, it falls on us to defend our rights to health and life as best we can, given the circumstances.

14. One medical letter in the Appendix is dated October 22, 2018. This medical excuse letter underscores our need for accommodation in deadlines.

It says, in part: "Willard has experienced recurring severe bouts of [..Redacted...] ever since smart meters were installed in his neighborhood by PPL Electric Utilities..."

confidential parts REDACTED

Willard's symptoms have been further aggravated by stress related to being unable to reach an amicable resolution with PPL regarding the meter... Significant additional stress has been added because Administrative Law Judge, Elisabeth Barnes, has denied any extension of deadlines so far imposed for the legal processes.

"Willard has informed me that even with his wife being incapacitated for an extended period of time and requiring his care 24/7 during this time... no accommodation for their health regarding deadlines has been offered".

15. Here in the Appendix, another medical excuse letter, dated

September 19, 2018, states that "Due to Elsbeth's and Willard's severe sensitivities to EMF and other forms of frequencies caused by cell phone and WiFi, this office and their primary doctor's office are safe places they can go to receive healthcare. My office computers are hard-wired and all cell phones are prohibited unless they are on airplane mode, due to one of my employees having severe sensitivity to WiFi and cellular phone networks. This makes it also safe for current patients and potential new patients who are EMF sensitive..."

The medical excuse letter lists 45 office visits for treatment service for Elsbeth from the period May 29, 2018 to the date of the letter: September 10, 2018, thus corroborating what Willard has been communicating often to PPL and Judge Barnes regarding the severity of Elsbeth's medical condition, the need for a great deal of treatment, and our need for additional time to prepare for our formal hearing requirements, including expert witness reports, preparing testimony, answering and preparing interrogatories, and responding to PPL motions, learning the legal system and engaging in additional filings.

16. The very nature of forcing disabled elderly electric utility customers to engage in the formal complaint process to keep a microwave emitting and conductive emissions generating smart meter off their property because this disabled elderly couple will be harmed by smart meter electromagnetic emissions, denies us substantive due process. We are forced to engage in this formal complaint process pro se, because we cannot afford a lawyer. We are elderly and severely disabled. We are fighting for our lives against two Goliaths, in the form of (1) the mighty PUC, with a bevy of in house lawyers, with the Attorney General of the Commonwealth of Pennsylvania to defend them when they are charged with crimes or civil actions, and an annual operating budget in the hundreds of millions of dollars, and (2) the mighty utility company, PPL, a multi-billion dollar company, with a huge stable of in house and outside counsel and expert witnesses to call on and pay for, utilizing the money it collects from customers such as us. Instead of supporting and enabling civilized conversation to reach sensible mutual understandings of varied perspectives, the system as it is being employed by PPL forces us to engage in this totally uneven battlefield of the formal complaint process in an attempt to merely maintain the level of our health in our own home, which uses no wireless devices nor smart appliances,

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nor cell phone, nor television, nor radio, nor dvd player, nor wifi, and only minimal computer equipment, all hard wired with shielded cable.

17. Judge Barnes states (page 7) that “Complainants requested a postponement or continuance of the hearing two days before the in person hearing” and also on page 5 “Two days before the hearing, on January 22, 2019, Mr. Sunstein complained of health issues and requested a second continuance of the hearing”, and on page 3, “On January 22, 2019, Mr. Sunstein e-mailed counsel for PPL and the presiding officer requesting a continuance of hearing, stating that he was suffering from health challenges”, as if that were the first time that we requested a postponement of the hearing in writing. This is not true.

18. We emailed PPL and Judge Barnes on January 7, 2019, stating that it was impossible for us to attend the upcoming hearing as scheduled due to Willard’s ongoing [.....Redacted.....] issues and we urgently requested a continuance at that time. (See email string from January 7, 2019 below.) This email string from January 7, 2019 shows that we complied with Judge Barnes’ statements on page 3 regarding request for a change in the scheduled hearing date, which “ must be submitted in writing no later than five (5) days prior to the hearing”. Our request in writing on January 7, 2019 to reschedule the hearing date because of our severe health issues, complies with the requirement of requesting a change more than five days prior to the scheduled hearing, yet Judge Barnes completely ignored this request and did not mention it in her Initial Decision. Instead, she mentions three times in her initial decision that we requested a change in the hearing date on January 22, 2019, two days before the hearing. This is a fatal procedural error to not consider our January 7, 2019 urgent written request to reschedule the hearing because of our ongoing debilitating health issues. The deaf ear turned to our urgent request was a significant stress contributing factor to Willard’s further health deterioration in the weeks leading up to the hearing.

19. If, in fact, Judge Barnes had considered our January 7, 2019 request for a postponement of our hearing, and if she had required a medical excuse to be furnished in a reasonable period of time before the scheduled hearing, we could have furnished that medical excuse to her and PPL, as shown by our willingness to provide, and, indeed, our provision of our medical excuse as soon as possible after we received Judge Barnes’ request for a medical excuse letter on January 23, 2019, by letter dated January 29, 2019, from our doctor.

Here follows in italics an email string giving evidence of this [email address of ALJ Barnes and Willard (Will) redacted, the other email addresses can be found on the web, so are left in]:-----

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Subject: Re: doctor's note will be forthcoming, motions for continuance motion to have this read as affidavit into the record should a hearing be held Re: preliminary motion for continuance Re: [External] William & Elsbeth Sunstein v. PPL Electric Utilities Corporation - Docket No. C-2018-3000078

Date: Fri, 1 Feb 2019 16:29:12 -0500

From: Will <...redacted @ ..>

To: Barnes, Elizabeth <redacted @pa.gov>, Ryan, Devin <dryan@postschell.com>

CC: Curtis S. Renner (crenner@w-r.com) <crenner@w-r.com>, Lent, Garrett <glent@postschell.com>, Michael J. Shafer (mjshafer@pplweb.com) <mjshafer@pplweb.com>, Chiavetta, Rosemary <rchiavetta@pa.gov>

*Dear Judge Elizabeth Barnes,
as promised, i attach here the confidential note from our doctor.
i realize that this is not within the schedule imposed; it was done on a best efforts basis. the impossible is simply not possible.
we presume a hearing was held in our absence.
please inform us what the next steps are ahead and what options are available to us to defend our rights.
thank you very much for your help.*

sincerely,

*willard
confidential note from dr. prociuk attached.*

On 23-Jan-19 19:07, Will wrote:

> Dear Judge Elizabeth Barnes,

> after an all too short pause trying to recoup my strength, do i return

> ever so briefly to my computer and notice only now that while i was

> writing my last emailed motions and affidavit you have decided the

> hearing will held as scheduled.....

we have requested from our doctor's office his next available appointment so we would be able to provide the note you requested.

.....> we cannot provide the requested note, of course, before it is possible

> to do so. we must see our doctor first.

> it is our hope with the promise of the note forthcoming, even without

> time for consideration of the email earlier written, that continuance

> will be granted as requested.

> we thank you very much for consideration of this at this last moment's

> notice.... had i not suffered such long and repeated incapacitations, it

> would not have been at the very last moment. we apologize to you for

> this....

> On 23-Jan-19 15:00, Barnes, Elizabeth wrote:

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>> I have not seen any medical excuses regarding Mr. Sunstein's health so
>> please plan to attend tomorrow's hearing as scheduled. I'm willing to
>> accommodate requests for witnesses and complainants wishing to appear
>> by phone if you provide me with a phone number where you can be
>> reached tomorrow morning.

>>

>> Elizabeth Barnes
>> Administrative Law Judge
>> Pennsylvania Public Utility Commission

>>

>> -----
>> *From:* Barnes, Elizabeth <redacted@pa.gov>
>> *Sent:* Wednesday, January 23, 2019 8:16 AM
>> *To:* Ryan, Devin; Will
>> *Cc:* Curtis S. Renner (crenner@w-r.com); Lent, Garrett; Michael J.
>> Shafer (mjshafer@pplweb.com); Chiavetta, Rosemary
>> *Subject:* RE: preliminary motion for continuance Re: [External]
>> William & Elsbeth Sunstein v. PPL Electric Utilities Corporation -
>> Docket No. C-2018-3000078

>>

>> A medical excuse can also be faxed to me by noon at 717-787-0481. I
>> am leaving the office today at 10:30 a.m. though, so I request an
>> e-mail also if you send a fax, which I can retrieve remotely. I would
>> like confirmation from PPL that it also received the excuse. Unless
>> you hear from me via e-mail today that the motion for continuance is
>> granted and the hearing is cancelled, please assume it will be held
>> tomorrow morning as scheduled.

>>

>> Regards,

>>

>> Elizabeth Barnes

>>

>> *From:* Barnes, Elizabeth <redacted@pa.gov>
>> *Sent:* Wednesday, January 23, 2019 6:08 AM
>> *To:* Ryan, Devin <dryan@postschell.com>; Will <redacted@....>
>> *Cc:* Curtis S. Renner (crenner@w-r.com) <crenner@w-r.com>; Lent,
>> Garrett <glent@postschell.com>; Michael J. Shafer
>> (mjshafer@pplweb.com) <mjshafer@pplweb.com>; Chiavetta, Rosemary
>> <rchiavetta@pa.gov>
>> *Subject:* Re: preliminary motion for continuance Re: [External]
>> William & Elsbeth Sunstein v. PPL Electric Utilities Corporation -
>> Docket No. C-2018-3000078

>>

>> I would like some medical excuse from a doctor by noon today, Mr.
>> Sunstein, filed or emailed as an attachment to me and counsel for PPL
>> before a continuation will be granted.

>>
>> *Regards*
>>
>> *Elizabeth Barnes*
>>
>> *Elizabeth Barnes*
>>
>> *Administrative Law Judge*
>>
>> *Pennsylvania Public Utility Commission*
>>
>> -----
>>
>>

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PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

>> **From.* Ryan, Devin <dryan@postschell.com <mailto:dryan@postschell.com>>*
>> **Sent.* Tuesday, January 22, 2019 4:43 PM*
>> **To.* Barnes, Elizabeth; Will*
>> **Cc.* Curtis S. Renner (crenner@w-r.com <mailto:crenner@w-r.com>);*
>> *Lent, Garrett; Michael J. Shafer (mjshafer@pplweb.com*
>> *<mailto:mjshafer@pplweb.com>); Chivetta, Rosemary*
>> **Subject.* RE: preliminary motion for continuance Re: [External]*
>> *William & Elsbeth Sunstein v. PPL Electric Utilities Corporation -*
>> *Docket No. C-2018-3000078*

>>
>> *Your Honor,*
>>

>> *Given the in-person hearings are less than two days away on January 24*
>> *and 25, 2019, PPL Electric Utilities Corporation ("PPL Electric") and*
>> *its witnesses have already made travel and lodging arrangements to*
>> *attend these hearings in person and otherwise prepare for hearings.*
>> *Moreover, Section 1.15(b) of the Pennsylvania Public Utility*
>> *Commission's ("Commission") regulations states that motions for*
>> *continuance of hearings are due "at least 5 days prior to the hearing*
>> *date." 52 Pa. Code § 1.15(b). There was no indication from Mr. and*
>> *Mrs. Sunstein ("Complainants") at least five days before the first day*
>> *of hearings that they would be making another request for continuance.*
>>.....

..... END of email string above.....

20. Judge Barnes has concluded we “chose not to appear” in the hearing that was held on January 24, 2019 (page 7). We did not “choose not to appear” any more than Willard chose to have [...Redacted...] when PPL had smart meters installed in our neighborhood, or Elsbeth chose to have [..Redacted.]. We were patently unable to appear. We did not chose that inability. We were very incapacitated with health issues. Those health issues are exacerbated by

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stress and the undue burden that PPL and the formal complaint process requires of pro se complainants who are not familiar at all with legal process.

21. The crux of our formal complaint before the court are the health issues caused to us in violation of Sections 1501 and 1502 of the PUC regulations by smart meters. Because we have been suffering from poor health ever since the summer of 2017 when PPL smart metered our neighborhood, it makes the pursuit of our formal complaint unduly burdensome within the time frames that the Court has imposed upon us.
22. We have requested continuances because of our health and for no other reason. We have requested a time frame to complete the required discovery and expert witness reports and preparation for a hearing that could allow us to complete those tasks, given our current states of health.
23. While ALJ Barnes in her only reply to our email dated January 7, 2019, did recognize our rights to have two days to our hearing, it contained no response to our urgently requested continuance. Our urgent request was ignored completely, left unmentioned; instead, she reaffirmed the earlier dates in the context of recognizing our rights to two days of a hearing, not in any context related to a continuance. We had been trying to get a rescheduling and a continuance at least as early as since August 24th, 2018 but to absolutely no avail.
24. Because of the burden of formal filings, and seeking human conversation towards resolution of issues, we have often communicated via email to opposing counsel and ALJ Barnes, rather than filing formal motions and replies. See attached email strings of various dates below and above.
25. The tenor of the findings of fact and conclusions of law in the initial decision is that we deliberately chose not to attend the scheduled hearing and deliberately chose not to submit expert witness reports.

Nothing could be further from the truth. The nature of the our illnesses were, that for many months, Elsbeth could not move in the slightest manner without extreme pain, and required Willard's complete attention 24 hours a day. (It was during this time that the telephonic prehearing conference for procedural scheduling was imposed upon us in spite of repeated urgent emails protesting the need to reschedule it.) Additionally, Willard suffered from and still suffers from [...Redacted...], which severely limits his ability to perform tasks, including but not limited to sitting by a computer to prepare for a hearing without any legal training whatsoever. While it was gracious of Judge Barnes to allow us to participate at the last minute via telephone in our hearing, this was not possible at all for the aforementioned medical reasons which are backed up by the physician letter *nunc pro tunc* furnished to

Judge Barnes and PPL on February 1st 2019 and included in the Appendix with this Exceptions filing.

26. Contrary to the history of the proceedings and the conclusions of law and Discussion contained in ALJ Barnes initial order, and despite Elsbeth's illness which began near the end of May, we were working on our formal complaint issues to the fullest extent possible despite our illnesses. For example, when Judge Barnes asked Willard (on page 24 of the July 10, 2018 transcript, line lines 7 ff and continued at the top of page 25 to line 3,) whether he had filed a *petition for interlocutory review*, he replied that he had not had the health to do so, it was quite complicated legally and intricate to file and it required him and his wife to be in adequate health. Judge Barnes responded: "I appreciate your health conditions", page 24 lines 2 to 3. (The interlocutory appeal which we wished to file, and had investigated the amount of time within which it was possible to file an interlocutory appeal, concerned Judge Barnes' granting a pro hac vice motion of PPL the day after PPL lawyer Ryan filed that motion, and before we were even served with the motion. We found out afterwards that the PPL motion was not served to us with a notice to plead. In spite of Secretary Chiavetta refusing our filing without our serving Mr. Ryan by US mail, and attorney Ryan's last minute refusing eservice under the thin pretext that PPL had not yet given him permission to accept eservice, despite all this, under great stress, we still managed to redo the filing with a changed service confirmation and refile as requested and then undertake an hour of driving to complete service with the only open post office to timely file a lengthy and, we believe, well pled objection to the motion. However, Judge Barnes denied our objection... she further indicated to us in communications that interlocutory appeals are not necessarily even accepted to consider and that it is rare for this to happen... and we were led to believe it would have to be very powerfully written to have any effect. This was made further difficult in our minds because of the page limitations in which the very multifaceted wrongdoings would have to be condensed and still complete enough to be effective for an appeal to the commonwealth court would that be needed. It may be noted that while Secretary Chiavetta told us not all utilities accept eservice, we have learned it is standard for attorneys to accept eservice amongst each other. Only after we independently found through search on the PUC website a great number of attorneys for PPL listed as accepting eservice, and confronted Mr Ryan with this fact per email asking him which one of those attorneys we should use for eservice, did he finally consent to receiving eservice from us himself.)

27. In spite of our medical needs and incapacities, we did identify and obtain consent from renowned expert witnesses to appear as our experts in our formal complaint hearing, as enumerated in the transcript of the July 10, 2018 telephonic preconference hearing page 41 line 4 to end of page 42: Erica Mallery-Blythe, MD, specializing in emf vulnerability research and founder of

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the Physicians' Health Initiative for Radiation and Environment <http://phiremedical.org> ; William Bathgate, electrical engineer who has done extensive research on smart meters and electricity quality; Olle Johansson PhD of the Department of Neuroscience at Sweden's Karolinska Institute and researcher in emf effects, who signed the World Health Organization report finding emf a probable carcinogen, and who claims it didn't go far enough yet, because it is a proven carcinogen; Timothy Schoechle PhD, an expert on the smart grid, who has produced an in depth research report on issues of the present implementation of smart meters, <http://gettingsmarteraboutthesmartgrid.org/> ; and a personal doctor of ours. By later email correspondence, dated January 7, 2019 (below), we informed PPL and Judge Barnes that we had identified two additional expert witnesses to testify in our formal complaint proceedings. One of these is Dariusz Leszczynski, who has a science blog focusing on the health effects of emf: <https://betweenrockandhardplace.wordpress.com/>. He has been an expert for the US Senate and the Canadian Parliament. He, like all our other witnesses who would be testifying over the phone, was willing to testify pro bono. However, he was fortuitously scheduled to be in New York City just before our hearing date and recognizing the advantage of appearing in person, he volunteered to come in person to the hearing with only a very small charge for his transportation. We had so wished that we had been healthy enough to enable this. The other expert who agreed to testify for us is Dr. Lawrence McKnight, an electrical engineer and medical doctor. Because of how the industry controls so much media, he had been earlier naturally skeptical regarding claims of vulnerability to commonly occurring emf pollution from cell phones and wifi etc. Yet his very educated wife not only suffered from these ever since smart meters were rolled out, she could identify by her suffering when he had forgotten to turn off his cell phone. This led him to investigate and he found overwhelming proof of emf vulnerability in the peer reviewed literature. He also found his medical colleagues with few exceptions quickly recognized this vulnerability when he explained the functional basis of it. Because of his engagement pro se in the suit (Docket No. C-2017-2621057) he and his wife were forced to make, he became intimately familiar with the testimony of PPL "experts" Davis and Israel. In particular he saw how various peer reviewed research had data sets "massaged" by industry to achieve hoped for results. He also learned first hand how arduous the legal process was for pro se complainants, even those in excellent health and with the highest professional training. Please see his exception brief which we include here in its entirety by reference. Additionally, before our scheduled hearing date, we had contacted several fact witnesses who would testify that smart meter deployment had harmed them, in accordance with the *Romeo v PUC* Commonwealth Court No. 498 C.D. (September 23, 2016) holding, that Mr. Romeo would not have to be personally injured by a smart meter to be given a hearing; he could have witnesses who have been harmed by smart meters testify in his hearing.

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We see no reason for the placement of procedural and substantial obstacles to unduly burden us, other than to keep extremely substantial evidence out of the courts.

28. We question why in PA utilities are permitted to expose customers to unnecessary risks and force customers to run a legal gauntlet to prove harm till a little something is done towards accommodation. Even disregarding the costs to health and life, it would be far less expensive to just permit those who need analog meters to have them. Because of our medical issues and because of the extreme pressures that were put upon us because of PPL's actions, despite all our good intentions to do so, we were not able to properly prepare and serve interrogatories, expert witness reports, and answers to PPL's additional motions. Our extremely poor health made it impossible for us to accomplish these tasks.
29. We requested accommodations from PPL and the Court for our health needs to prepare properly for their hearing. These requests are in writing in email strings (below).

Willard was totally debilitated by [.....Redacted.....] during numerous days as attested to in emails, and as corroborated by his physician letters. It was impossible, as suggested by Judge Barnes, for us to attend the hearing even via telephone on January 23 and 24th. She writes as though Elsbeth could have represented us at the hearing. However, Elsbeth was needed to tend to Willard [.....Redacted....]. Even if we would ignore health considerations, it must be noted that Elsbeth, who has taught at the collegiate level the art of music pedagogy for children with special needs, whose expertise is in teaching music and children with special needs does not have the constitution to stand in the front lines of the assault upon us by PPL. On the other hand, because we are one in marriage and because of Willard's limitations, her deep soul support, and the coordination together of the two of us in all aspects of our defense is essential to Willard's work which involves standing in the front line of the legal machinery rolling against us. Willard's constitution at this present time is also in no way [..Redacted...] robust enough to stand in these front lines either. A professor emeritus, and former department head at a law school, shared with us years ago with a smile how he wisely gave up all thought of being involved in litigation after his first taste of it. Even with all his legal expertise, the court wasn't the place for someone with his constitution, which was ideally suited to researching and teaching international law. As artists with a straightforward passion for beauty, truth and goodness, and no formal legal education, we are totally unfitted to work as litigators in the convoluted confrontations demanded by court procedures.

We had informed PPL and Judge Barnes as early as August 2018 and again in January 7, 2019, and again on January 22, 2019, (we wrote as soon as we could when Willard finally had a pause after particularly debilitating [.....Redacted.....] that had continued for 4 days and nights [.....Redacted.....]). We wrote that we were unable to attend to the necessary requirements of the schedule nor attend the hearing because of the family lack of health. (see email strings below).

30. We had requested a rescheduled hearing much earlier than the time frame of January 22, 2019 as stated in the Initial Decision of Judge Barnes on pages 3, 5, 8 and we did make this request for good cause. Judge Barnes states on page 9, that “Mr. and Mrs. Sunstein’s second request for a continuance was made two days before the scheduled hearing over the objection of PPL without good cause”. This conclusion of law is wrong for multiple reasons. We had more than than two requests for continuance. Our immediately previous request for a continuance was made 18 days before the scheduled hearing, and it was made for good cause. The medical impossibility for us to attend the hearing, even via telephone, was written by us as early as January 7, 2019, was repeated by email by us on January 23, 2019 and was verified by our physician by letter of January 29, 2019. The fact that (1) Judge Barnes refused to consider our January 7, 2019 email requesting a continuance of the hearing for good cause, the fact that (2) Judge Barnes never asked us to furnish a medical letter following our email of January 7, 2019 requesting a postponement of our hearing because of our debilitating health condition; the fact that (3) Judge Barnes only considered our last ditch effort in utter desperation to inform PPL and Judge Barnes once more that it was impossible for us to attend the hearing due to health issues, then requiring a physician letter that could not have been furnished in the incredibly short time frame chosen by Judge Barnes to receive this medical letter (4) the fact that Judge Barnes states in the initial opinion that she never received the medical letter, even though it was sent promptly to her and PPL a month before the date of her initial decision, indicates that her decision to dismiss our formal complaint with prejudice is against the weight of the facts and against the weight of the law.

31. We have met our burden of proof that we had informed the Court and opposing counsel of (1) our disabilities, (2) our fervent push to complete the formal complaint formalities, (3) our severe and ongoing health problems which made it impossible to prepare for and attend our hearing in full, and (4) our written requests to reschedule the formal hearing (a) many months, and then (b) many weeks before the scheduled hearing, and finally, (c) a few days before our scheduled hearing (5) We have shown our cooperation with the Court directives to supply a medical letter as soon as we could obtain this letter.

With all due respect to Judge Barnes, Judge Barnes has acknowledged none of these factors. With respect to her, Judge Barnes has not only ignored all of them, she has denied that any of these factors existed. She did not mention our January 7, 2019 written request for a continuance in her initial decision. She did not mention that she required a medical excuse to be furnished to her within an impossible time period for anyone to accomplish unless their doctor was sitting right across the room from them and had the time to write the letter and fax it to her. With respect for Judge Barnes, she did not mention that she received the letter as soon as possible after it was written. In fact, she says she did not receive the medical excuse letter, and uses that as a pretext for dismissing our formal complaint with prejudice.

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32. Here immediately below in italics with some parts in bold for emphasis is the relevant part of the **August 24, 2018** letter string, requesting a continuance of the hearing due to medical issues:

> *From: Will [mailto:redacted @]*
> *Sent: Friday, August 24, 2018 10:01 AM*
> *To: Barnes, Elizabeth*
> *Cc: Ryan, Devin; Amy E. Hirakis (aehirakis@pplweb.com); Lent, Garrett*
> *Subject: extension request Re: Sunstein v. PPL Electric - PPL's*
> *Proposed Hearing Dates*
> *Importance: High*
>
> *Your Honor Elizabeth Barnes,*
>
> *we thank you for this earlier email of yours, and the one more*
> *recently sent regarding transcripts. we started a reply yesterday and*
> *will complete and send it when we can.*
>
> *this email of yours is very helpful; we unfortunately were not in a*
> *state of health enabling a reply when you wrote it, nor were we before*
> *or after your last order. even during the prehearing conference, we*
> *did not have a sufficient state of health, nor because of the severe*
> *pains elsbeth was suffering during the prehearing conference which*
> *precluded my tending to her, and because of the exhaustion with*
> *dealing 24/7 with health issues and a very recently ended long bout of*
> *[.....Redacted.....], did i have the presence of mind to be able to clearly*
> *identify, articulate and defend our just scheduling needs during the*
> *prehearing conference.*
>
> *the one time our health permitted us with considerable effort to*
> *resume work on the amended complaint after the prehearing conference*
> *was the day i wrote melissa. on that day, my optimism, combined with*
> *feeling the pressure to meet deadlines, and our own desire to find*
> *completion in this process, led us to be vastly overly hopeful*
> *regarding our situation. the attempt to unduly stretch forces beyond*
> *their natural limits enhanced and possibly led to issues flaring up*
> *again. that night we had health reversals that have precluded working*
> *on the amended complaint since then.*
>
> *we absolutely need to have an extension. even now as we are doing*
> *better, our health still necessitates 5 doctor appointments this week.*
> *as we mentioned before, these are all paid for completely out of*

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> pocket because we have no medical insurance. we must rush out to an > appointment immediately after sending this email, done somewhat in > haste because of timing necessities...

>

> we appreciate very much your including in your last order a clause > explicitly mentioning the possibility of schedule changes when these > would be essential.

>

> we have tried to begin writing a motion asking for a schedule change, > but this will take time. it is sad to say, but we anticipate attorney

> ryan will continue his approach to deny everything and try and force > through something untenable for any seeking justice here.

>

> a clear sign of this in the past has been how he scheduled his "experts" > for a hearing in november, after i had written him that we thought it > might work at the times you suggested as possible in the end of > january, but certainly not before. he then used this schedule of his > to try and force through that the hearing would march to his schedule."

-----end of email above-----

And here again in italics with emphasis added in bold, is an email string dated January 7, 2019, showing our progress on the formal complaint expert witness list, our ongoing health issues which make it impossible to perform needed tasks to prepare for the hearing, and stating that was absolutely essential that she reschedule the hearing dates due to our ongoing health issues, **and showing how she completely ignored our then repeated request for a continuance:**

"Subject: RE: [External] Re: C-2018-3000078 Sunstein v PPL - PPL's Letter request to cancel second hearing date - January 25

Date: Mon, 7 Jan 2019 13:52:52 +0000

From: Barnes, Elizabeth <redacted @pa.gov>

To: Will <redacted @.net>, 'dryan@postschell.com' <dryan@postschell.com>, Michael J. Shafer (mjshafer@pplweb.com) <mjshafer@pplweb.com>

As Complainants object to shortening the 2-day hearing to 1 day, PPL's request is denied. The hearing will be held as scheduled January 24 and 25, 2019.

Regards,

Elizabeth Barnes

—Original Message—

Date: Mon, 7 Jan 2019 00:18:22 -0500

confidential parts REDACTED

From: Will <redacted @....>

To: Barnes, Elizabeth <redacted @pa.gov>, 'dryan@postschell.com'
<dryan@postschell.com>, Michael J. Shafer (mjshafer@pplweb.com)
<mjshafer@pplweb.com>

Dear Elizabeth Barnes, Administrative Law Judge....

.....In addition to the earlier named expert witnesses we now have two more, another scientist from Europe, and an electrical engineer who is also a medical doctor who has deeply researched problems with emf. So we have now a total of 7 (seven) expert witnesses who have agreed to testify on our behalf. We have not had time to study the extensive testimony of PPL's "experts" nor time to write up questions to our expert witnesses for them to answer to submit their expert testimony. As soon as we have the health and energy to do so, we shall do so. We also intend to and are sure we can procure agreement from more expert witnesses to testify on our behalf without charging us. we have not pursued acquiring them because we have not yet had time to work with the ones we have....

...As we have earlier written, and had hoped to further write about, but were hindered by the burdens of our present life and health situation, burdens significantly intensified by PPL, it is absolutely essential, shall justice be served, that our hearing be rescheduled. it is within your power to do so without even consulting the other party. we have seen this in the PA code. we cannot find that code with such short notice.. but we have stored it in our computer. surely you know it. if you somehow would be ignorant of it, and wish us to provide it, we will gladly do so, but you can surely find it more quickly than we.

We have not yet had the resources of health, energy and time and legal knowledge to write further as we had indicated we would in our last filing.

....extending the hearing date will in no way be of detriment to PPL's justifiable interests. (of course if their interest includes the desire to harm and destroy us as much as possible, and we have evidence that is the case, it would harm that interest. but it in no way harms any just interests of PPL.)...

..extending the date will lead to further opportunity to come to a peaceful solution together after PPL sees the mountain of evidence we can provide with time...."

-----End of Email string above-----

33. Judge Barne's reply to our email of January 7, 2019 requesting a continuance, was only to permit us to have two days to a hearing, not to reschedule it. She refused to take notice of our urgently pleaded request for continuance.

confidential parts REDACTED

We were unable because of Willard's [..Redacted.], to file a formal motion for a continuance even at the start of the month, which is why we sent the email requesting a continuance on January 7, 2019 (above).

34. In a final attempt to secure a continuance since Willard had been confined to bed for 4 days prior to January 22 with [.....Redacted..... ..], which had been ongoing for several months, we sent another email to Judge Barnes and PPL counsel, stating that our earlier requests for a rescheduling for the hearing because of health reasons had gone unheeded, and it was impossible for us to attend the hearing dates which had not been rescheduled at our urgent request weeks before. Further, we were responding to Judge Barnes' email regarding an additional burden put on the us at the last minute: a filing by PPL for a motion *in limine*, which Judge Barnes informed the us via email on January 22, 2019, would have to be argued in the hearing on January 24, 2019.

-----here again, email in italics with bold emphasis added-----

:Subject: preliminary motion for continuance Re: [External] William & Elsbeth Sunstein v. PPL Electric Utilities Corporation - Docket No. C-2018-3000078

Date: Tue, 22 Jan 2019 14:38:52 -0500

From: Will <redacted @>

To: Barnes, Elizabeth <redacted @pa.gov>, Langan, A. JoLene <jlangan@postschell.com>

CC: Curtis S. Renner (crenner@w-r.com) <crenner@w-r.com>, Lent, Garrett <GLent@PostSchell.com>, Michael J. Shafer (mjshafer@pplweb.com) <mjshafer@pplweb.com>, Ryan, Devin <DRyan@PostSchell.com>, Chiavetta, Rosemary <rchiavetta@pa.gov>

Dear Judge Elizabeth Barnes,

because our pleas for recognition of our health challenges have till now fallen on deaf ears, i have been following advice of a friend to file a motion for continuance. however, health challenges have impeded completing this in the form commonly required.

this month has brought increased health challenges to me. As my wife and i with support of many witnesses are convinced, the biological and psychological stress of barrage in the field and in legal proceedings with emf and lies by agents of PPL against us has been a crucial factor in this which has led now to ongoing [.....Redacted.....] that since friday evening last have kept me in bed under the care of my wife, elsbeth. i have been too incapacitated to get up and even turn on the computer since then. only now, have i found a sufficient reprieve to

confidential parts REDACTED

*force myself. however, i am still exhausted and yet in pain. My [.....
..Redacted..... ..] and only under great stress do i write.
it will be utterly impossible because of health circumstances to take part in a
hearing yet scheduled for this week.*

*this writing is and shall be considered our best attempt towards filing a formal
motion for continuance at this time.*

*when i have sufficient recovered and am able to do so we will file, nunc pro tunc, a
more complete and under standard procedure, motion for continuance addressing
more fully the reasons needed.....*

*we blind copy witnesses to our sending this email and our unusual but necessary form
of filing this preliminary motion for continuance, hereby sent also to the secretary of
the pa puc, Rosemary Chiavetta.”*

“On 22-Jan-19 10:22, Barnes, Elizabeth wrote:

> ALL:

>

**> I will hear oral argument on the Motion in Limine at the start of the
> hearing Thursday.**

>

> Regards,

>

> Elizabeth Barnes”

-----end of email string above -----

35. Even looking at the January 7, or January 22, 2019 time frame, PPL could have canceled its witnesses’ travel plans and saved this money which PPL lawyer says was an incurred expense.

36. We did provide physician documentation, and with this filing, are providing additional physician documentation, which corroborates exactly what we have been emailing to the ALJ Barnes and opposing counsel for many months.

Contrary to ALJ Barnes’ statement and conclusions of law number 10, on page 5 of her initial decision, that “Complainants did not produce a medical excuse”, we did furnish the requested medical excuse letter on February 1st, 2019, to both Judge Barnes and to PPL, a month before ALJ Barnes initial decision was made.

37. We did not receive any notification from any servers of ALJ Barnes or opposing counsel or from our internet service provider that our email sending

confidential parts REDACTED

the medical excuse letter was not received. This physician letter is dated January 29, 2019, verifying Willard's debilitating [..Redacted...] condition which precluded our attending the hearing in this formal complaint hearing scheduled for January 23 and 24, 2019.

- 38.** We were surprised to read ALJ Barnes' initial decision, stating on page 4, that Counsel made an oral motion to dismiss the complaint with prejudice for failure to appear and prosecute" and "Counsel indicated Complainants have repeatedly complained of health issues, however, they have never sent medical records or notes from any licensed medical professional saying Complainants have health issues precluding them from litigating their case".
- 39.** We were not informed of the oral motion, nor when transcripts would be available, in spite of our february 1st 2019 email above when we sent in our doctors letter and asked ALJ Barnes: "...please inform us what the next steps are ahead and what options are available to us to defend our rights. thank you very much for your help." Otherwise, we would have opposed this motion in some form to the best of our ability as we do here. We could not attend the hearing, as we explained to ALJ Barnes and opposing counsel, because of our health issues, which were already substantiated and backed up with a medical letter as quickly as possible detailing exactly what medical condition entirely precluded our participation in the hearing on the scheduled timing.
- 40.** We were never informed that we should provide medical documentation of our health issues except when Judge Barnes emailed us the morning of January 23, 2019, requiring a medical excuse to be provided within a few hours. We complied with supplying a current medical excuse letter as soon as it was possible for us to do so. We are trusting, honest people. We expect others to accept our word when we say we are unable to attend to matters because of health issues. The only time that any medical records were requested of us, was when they were required to have been provided within an impossible window of a few hours.

In fact, Willard's physician wrote, in part, after detailing the debilitating [..Redacted...] condition that Willard has been suffering from, in the already provided January 29, 2019 medical excuse letter:

"I opened up an email from Mr. Sunstein at 12:15 pm on the day you (Judge Barnes) had requested a doctor's note by noon in order to be excused from a hearing scheduled to take place the following day. He had sent the email about 2 hours earlier. Logistically it was not possible to see him until today."
"Mr. Sunstein would have been unable to participate in the scheduled hearing for clear medical reasons".

41. Conclusion and Prayer Requesting Relief:

Wherefore, for all the reasons stated above, we request that our formal complaint NOT be dismissed with prejudice, because we have shown good cause, have repeatedly requested a continuance of our hearing more than five days before the hearing, and have supplied on the only occasion when they were requested, medical records indicating the medical impossibility of our attending the hearing at the scheduled time.

We ask further that the Commission grant us the relief requested in our Formal Complaint that PPL cease and desist from all efforts to deploy a smart meter on our property because it is dangerous to our health, and utilize an electro-mechanical analog meter to measure our electrical usage. We ask further that this be done for our neighbors as we have learned is done in Florida. We are willing, at our expense, to supply PPL with ANSI calibrated electro-mechanical analog meters for ourselves and our neighbors for these purposes.

We know of one family who was forced to leave PA because of your smart meter implementation order, have heard from others contemplating it, and others trying to go off grid so they can stay in their homes... Surely there are many many more.

As a very little girl, fearing with her family for their lives, Willard's grandmother saw from a cellar the property of her family burned down by arson in the pogroms of Russia.... And that wasn't the only thing she saw.. ... He never had imagined he and increasingly many others would have to face what feels like threats of a similar experience here in Pennsylvania.

We additionally request the PA PUC to revisit the implementation order and address precisely, clearly, and directly the points we have raised here and in our motion of May 10th 2018 regarding its irregularities. If this be done in a straightforward manner, we are sure you will fulfill our request to align the implementation order with the clearly express will and intent of those who wrote PA Act 129. Please do so with all God's Speed. It would relieve immense suffering in what is meant to be our Commonwealth of PA and also solve our case and, from what we understand, over a thousand other cases... .. plus countless more that were dropped or never begun because of difficulties involved.

We believe it in the best interests of the utilities and their regulators to seek justice with help of the law rather than shortsightedly employ the later to circumvent the former.

We pray that the arcane and powerful tools of the legal system will be ever increasingly used to serve justice by those in a position to do so.

We envision a time when even monopolies like utilities would thrive and prosper by honoring the privilege of their monopoly with best efforts extended to serve the public.

Thank you for your consideration.

50 State Smart Meter Opt Out Chart

This state smart meter opt-out chart is up to date as of August 1, 2018, using information that is publicly available on the internet.

Background:

1. Smart meter opt outs take three general forms:
 - a. State legislation mandating smart meter opt outs.
 - b. State public utility commission regulations mandating smart meter opt outs.
 - c. State public utility commission orders approving opt outs and opt out tariffs for different utilities in their smart meter filings.
2. For several states that are new to smart meter deployment, we were unable to find state mandates, public utility regulations or tariffs regarding opt out filings, so we left those states blank, because we could find no references to smart meter opt out or to mandatory smart meter deployment for residential households.
3. If we were able to find at least one utility in the state which permits smart meter opt outs, we listed that state as a "YES", because obviously, there is at least the possibility of opting out of smart meter deployment in that state.
4. All cited authorities in this chart are compiled and available in full format following this link: <https://www.ehs.group/>

States which have considered smart meter harm	Opt Out?	DATE	Authority
Alabama			
Alaska			
Arizona	YES	12/18/2014	Arizona Corporation Commission Decision No 74871 Docket No E-01345A-13-0069
Arkansas	YES	10/30/2017	Arkansas PSC ORDER 8: DOCKET 16-060-U (Entergy AMI metering application)
California	YES	2/1/2012	CA PSC smart meter opt out order 12-02-014.
Colorado			
Connecticut	YES	8/29/2011	Draft Conn PURA opinion Docket 05-10-03RE04
Delaware			
Florida	YES	1/7/2015	Florida PSC order PSC-15-0026-FOF-EI, Docket 130223-EI
Georgia	YES	12/17/2013	<p>"Smart Meter Q & A - Georgia Public Service Commission</p> <p>On December 17, 2013 the Commission approve a Smart Meter Opt-Out tariff as part of Georgia Power's 2013 rate case. Customers who opt out of having a smart meter installed and prefer to maintain a mechanical meter at their residence or facility can now do so with a basic service charge of \$19 per month."</p> <p>Georgia Public Service Commission Docket # 36989</p>
Hawaii	YES	2013	Kauai Island Utility Cooperatives opt out;

August 2017 smart meter opt in only:
Hawaiian Electric

8/29/2017 Maui Hawaiian Electric proposes opt in only

2/7/2018 Hawaii PUC Order No 35268 Docket 2017-0226

Idaho	YES	2015	Idaho Falls response to CRC opt out recommendations #6.4
Illinois	YES	2/5/2014	Illinois Commerce Comm. Com Ed Opt Out Order 13-0552
Indiana	YES	6/13/2018	Indiana Utility Reg Comm Order Cause 44963
Iowa	YES	pre 2018	Alliant Energy filings with Iowa Utilities Bd allow opt outs from AMI Meters.
Kansas			
Kentucky	YES	4/13/2016	Kentucky PSC Order case 2012-00428
Louisiana	YES	October 2012	Lafayette Utility System smart meter opt out tariff approved by City-Parish Council
Maine	YES	5/19/2011 6/22/2011	Maine PUC Part I Opt Out Order,
Maryland	YES	1/7/2013	Maryland Public Service Commission Order No. 85294 Cases no 9207, 9208, 9294
Massachusetts	YES	2014	Massachusetts Dept of Public Utilities tariff 13-83-A
Michigan	YES	6/28/2013	Michigan PSC Decision Case No. U-17087
Minnesota	YES	as of August 2018	Connexus Energy Opt out form

Mississippi	YES	5/17/2017	PSC Order docket 2016-UA-261
Missouri	YES	2018	Missouri City Utilities AMI Opting Out informatio City Utilities website 2018
Montana			
Nebraska			
Nevada	YES	2/4/2013	Nevada PUC Docket No. 12-05003
New Hampshire	YES	6/7/2012	NH Cons Stat. Title 34 Ch. 374 section 374-62
New Jersey	YES	May 2013	Orange & Rockland electric utility offers opt outs
New Mexico	YES	4/11/2018	NM Public Reg Comm. Final Order, Case No. 15-00312-UT
New York	YES	10/19/2017	NY PSC Order Case no 14-M-0196
North Carolina	YES	6/22/2018	North Carolina Utilities Commission Order in Docket No. E-7, SUB 1115; Docket No. E-100, SUB 147; DOCKET No. E-100, SUB 153
North Dakota			
Ohio	YES	4/27/2016	OHIO PUC Order re Duke Energy Opt Out case numbers 14-1160-EL-UNC
Oklahoma	YES	7/1/2018	Oklá. Corp Comm. Order No. 679358, Docket No. PUD 201700496
		5/1/2017	Oklá. Corp Comm. Order No 662059, Docket No. PUD 201500273

Oregon YES 3/21/2017 PUC PACIFICORP, d/b/a PACIFIC POWER Order No. 17-113

Pennsylvania	Not Yet	5/3/2018 6/14/2018	PUC final decision C-2015-2474602 PUC final decision C-2015-2475355
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Rhode Island YES 2/1/2013 RI PUC Case No. 2130

South Carolina	YES	11/17/2016	SC PSC DOCKET NO. 2016-354-E - ORDER NO. 2016-791
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South Dakota

Tennessee	YES	August-2012	Cleveland Utilities offers opt outs
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Texas YES 8/9/2013 TEXAS PUC non standard meter service Project 41111 Rule PUC Regulations Section 25.133

Utah	YES	3/7/2017	Provo Municipal Council 17-043 AMI Opt Out Policy and fee request
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Vermont YES 5/18/2012 30 V. Stat. Ann. § 2811

Virginia	YES	5/14/2013	Dominion Energy smart meter opt outs: Dominion Energy website under "Location: Virginia"
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Washington YES 4/10/2018 Wash UTC docket U-180117 Policy Statement

West Virginia	YES	5/14/2013	Dominion Energy smart meter opt outs: Dominion Energy website under "Location: West Virginia"
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Wisconsin YES 11/1/2012 Order docket 5-WI-101 Wisconsin Public Service Commission

Wyoming	YES	12/23/2013	Wyoming PSC Docket No. 10012-59-CT-13 (Record No. 13658)
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[Confidential HIPAA protected letter

dated January 29, 2019

Redacted]

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APR - 4 2019

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

[Confidential HIPAA protected letter

dated September 10, 2018

Two Pages Redacted]

[Confidential HIPAA protected letter

dated September 10, 2018

Two Pages Redacted]

[Confidential HIPAA protected letter

dated October 22, 2018

Redacted]

Verifications

I, Willard Sunstein, hereby state that the facts above set forth 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. §4904 (relating to unsworn falsification to authorities).

Date: 24. III 2019

Willard Sunstein
Willard Sunstein Complainant

I, Elsbeth Sunstein, hereby state that the facts above set forth 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. §4904 (relating to unsworn falsification to authorities).

Date: 24. III 2019

Elsbeth Sunstein
Elsbeth Sunstein Complainant

Verifications

We, Willard and Elsbeth, both confirm that the above is the confidential redacted form for public posting of our Exceptions with otherwise no changes of the originally submitted filing of 24, March 2019 mailed on 25, March 2019.

I, Willard Sunstein, hereby state that the facts above set forth 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. §4904 (relating to unsworn falsification to authorities).

Date: 3 April 2019

Willard Sunstein
Willard Sunstein Complainant

I, Elsbeth Sunstein, hereby state that the facts above set forth 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. §4904 (relating to unsworn falsification to authorities).

Date: 3. April 2019

Elsbeth Sunstein
Elsbeth Sunstein Complainant

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APR 4 - 2019

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

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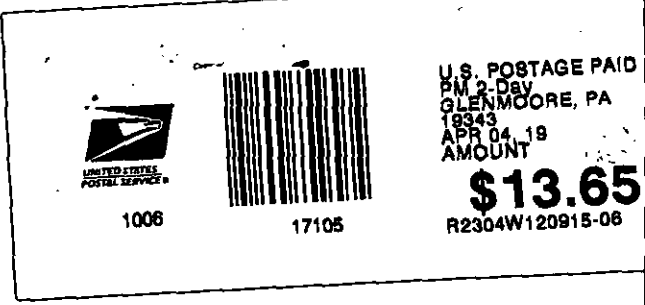
PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

Redacted for

Public

filing

Willard + Elsbeth Justisern
860 Cupda Road
Honey Brook, PA 19347



**RETURN RECEIPT
REQUESTED**

Secretary
Pa. Public Utility Commission
P.O. Box 3265
Harrisburg, PA 17105-3265