

CONCHITA M BRAUN

**1220 Parkside Drive South
Reading, PA 19611**

610 /375-3501

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APR 30 2019

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

April, 30th 2019

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

**RE: Conchita M Braun vs. Metropolitan Edison Company
Docket No. C-2018-3003001**


Dear Secretary Chiavetta:

Enclosed please find my Request for Cancellation of the Prehearing Conference.

This document has been served on to First Energy/ Metropolitan Edison Company as shown in the Certificate of Service. Copies have also been sent to the Honorable Jeffrey A. Watson.

Please feel free to contact me if you have any questions.

Sincerely,



Conchita M Braun
1220 Parkside Drive South
Reading, PA 19611
(610) 375-3501

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

CONCHITA M BRAUN

v.

METROPOLITAN EDISON COMPANY

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Docket No. C-2018-3003001

REQUEST FOR CANCELLATION OF PRE-HEARING CONFERENCE

This request in in reference to a notification I received on April 25th, that a Prehearing Conference had been scheduled to take place on May 16th 2019.

A Prehearing conference is not appropriate at this time for the following reasons:

1. Parties are still in the middle of the discovery process, therefore a prehearing conference is premature at this time.
2. The Respondent stated in a letter sent to Administrative Law Judge Jeffrey Watson on March 26th, that they objected to Complainant's request for extension of the litigation schedule and that they believed that scheduling a prehearing conference would be beneficial to discuss next procedural steps. This request was made while on the same day, Administrative Law Judge Watson had issued a Revised Litigation Schedule.
3. On the Order issued scheduling the Prehearing Conference Judge Watson states, in regards to the Respondent's request to a prehearing conference:

" ... No objection was filed in this proceeding. Under the circumstances a prehearing conference will be scheduled... "

Complainant is unaware of having to file objections on the Respondents belief that a prehearing conference would be beneficial. No notice to plead was sent to Complainant indicating that a response was needed or expected, Respondent's letter was addressed to the Judge overseeing this proceeding and not to the Complainant.

4. On April 11th Complainant issued a Motion to Compel Respondent to answer the Interrogatories and Production of documents that the Respondent had objected to. As of this date, April 30th, Respondent has not issued a timely response to the Motion to Compel. Complainant is still awaiting the answer from ALJ Jeffrey Watson, addressing the Complainants Motion to Compel.
5. As stated in previous orders issued by judge Jeffrey Watson: *" Any party may request a prehearing conference or settlement conference in writing, after conferring with opposing Party and requesting consent to the scheduling of such a conference."* At no

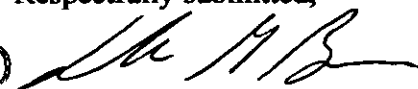
time has the Respondent conferred with the Claimant, requesting consent to schedule such a conference.

6. A prehearing conference is a reasonable protection offered to defendant rights and is commonly practiced when the powers from both parties is equal. In my case as a pro se litigant, I'm extremely limited in the ability to draw upon any legal advantages. On the contrary, unlike the Respondent in this case, a multi-billion-dollar Company, that has lawyers, secretaries, assistants and unlimited time and resources, I lack the financial luxury and resources available to the Respondent as well as the time, knowledge and the expertise in legal matters that they have. The Company's lawyers take care of this kind of matters day in and day out. The Complainant's career is not in law and has to depend on limited spare time to prepare for her case, Complainants' resources and knowledge to work on matters regarding this proceeding is very limited. Complainant is trying to keep up with this process to the best of her ability and file time consuming documents in a timely manner as much as possible, while sacrificing home, family, work and other responsibilities, to do so. The pro se Complainant is therefore at a clear disadvantage and decisions should be made keeping that in mind, and not at the convenience of the Respondent with disregard to the many limitations and spare time available to the Complainant.
7. Proceeding with a Prehearing conference at this time, would be premature and a waste of time for all parties involved. Preparing for multiple filings in this proceeding, is a continued drain on my limited time and a continued burden, as it takes me away from the little time I have to do proper research and preparation for my case and instead having to dedicate that time to continually file different documents to defend my position. Being constantly rushed to address a legal proceeding seems an improper way to proceed as it doesn't allow the Complainant the time to research, read and work on important documents to present for her case. Complainant wonders if creating this kind of continued contention is part of the tactic by powerful Respondents in hopes that disadvantaged Complainants give up.
8. Complainant would agree to a pre-hearing conference at a later date when discovery has concluded, and *after* an opportunity for Mediation has taken place. Complainant first request a chance for Mediation, before proceeding any further, to see if the Parties can come out with an agreeable resolution. In case an agreeable resolution is not reached through Mediation and once discovery has concluded, then it would be the appropriate time to try to schedule a Pre-hearing conference, consented by both parties at an agreeable date.

WHEREFORE, Complainant, Conchita M Braun, respectfully requests that as in similar cases in front of the Commission, the Prehearing Conference be cancelled and that the Parties be offered an opportunity for Mediation.

Respectfully submitted,

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Conchita M Braun

Dated April 30, 2019

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SECRETARY'S BUREAU

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

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Docket No. C-2018-3003001

CERTIFICATE OF SERVICE

I, Conchita M Braun, hereby certify that I have this day, April 30, 2019, served a true copy of this document upon the Company and individuals listed below, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant)

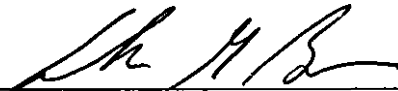
Service by Certified Mail to:

and First Class Mail to:

Lauren Lepkoski
Tori L Giesler
First Energy Service Company/Met Ed
2800 Pottsville Pike
P.O. BOX 16001
Reading, PA 19612-6001

ALJ Jeffrey A Watson
Pennsylvania Public Utility Commission
301 5th Avenue, Suite 220- Platt Place
Pittsburgh, PA 15222

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



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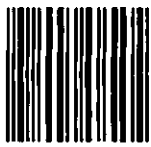
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