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File #: 167945

May 14, 2019

VIA ELECTRONIC FILING

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor North
P.O. Box 3265
Harrisburg, PA 17105-3265

Re: Jeffrey Smiles v. PPL Electric Utilities Corporation
Docket No. C-2018-3003895

Dear Secretary Chiavetta:

Enclosed for filing is the Motion of PPL Electric Utilities Corporation to Compel Responses to Discovery Propounded on Jeffrey Smiles – Set I in the above-referenced proceeding. Copies will be provided as indicated on the Certificate of Service.

Respectfully submitted,



Devin Ryan

DTR/jl
Enclosures

cc: Honorable Elizabeth Barnes
Certificate of Service

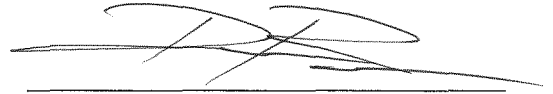
CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been served upon the following persons, in the manner indicated, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

VIA OVERNIGHT DELIVERY

Jeffrey Smiles
3049 Octagon Avenue
Sinking Spring, PA 19608

Date: May 14, 2019



Devin T. Ryan

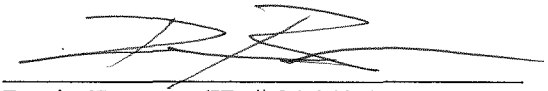
**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Jeffrey Smiles,	:	
	:	
Complainant,	:	
	:	
v.	:	Docket No. C-2018-3003895
	:	
PPL Electric Utilities Corporation,	:	
	:	
Respondent.	:	

NOTICE TO PLEAD

YOU ARE HEREBY ADVISED THAT, PURSUANT TO 52 PA. CODE § 5.342(g)(1), YOU MAY FILE A REPLY TO THE ENCLOSED MOTION TO COMPEL WITHIN FIVE (5) DAYS AFTER THE DATE OF SERVICE. YOUR REPLY SHOULD BE FILED WITH THE SECRETARY OF THE PENNSYLVANIA PUBLIC UTILITY COMMISSION, P.O. BOX 3265, HARRISBURG, PA 17105-3265. A COPY OF YOUR REPLY SHOULD ALSO BE SERVED ON THE UNDERSIGNED COUNSEL.

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Date: May 14, 2019

Attorneys for PPL Electric Utilities Corporation

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Jeffrey Smiles,	:	
	:	
Complainant,	:	
	:	
v.	:	Docket No. C-2018-3003895
	:	
PPL Electric Utilities Corporation,	:	
	:	
Respondent.	:	

**MOTION OF PPL ELECTRIC UTILITIES CORPORATION TO
COMPEL RESPONSES TO
DISCOVERY PROPOUNDED ON JEFFREY SMILES – SET I**

TO ADMINISTRATIVE LAW JUDGE ELIZABETH H. BARNES:

Pursuant to 52 Pa. Code §§ 5.342(g) and 5.349(d), PPL Electric Utilities Corporation (“PPL Electric” or the “Company”) hereby files this Motion to Compel Responses to Discovery Propounded on Jeffrey Smiles (“Complainant”) – Set I. In support of its Motion, PPL Electric states as follows:

I. INTRODUCTION

1. On February 7, 2019, PPL Electric served Interrogatories and Requests for Production of Documents on the Complainant – Set I (“PPL to Complainant Set I”) via first class mail. A true and correct copy of PPL to Complainant Set I is attached hereto and marked as **Appendix A**.

2. Pursuant to the Commission's regulations, objections to PPL to Complainant Set I were due on or before February 20, 2019, and responses were due on or before March 4, 2019.¹

3. By letter dated March 16, 2019, the Complainant requested a 30-day extension to provide answers to PPL to Complainant Set I.

4. On March 21, 2019, PPL Electric agreed to the Complainant's 30-day extension and stated that responses should be provided by April 15, 2019, accordingly.

5. The Complainant never served any objections or answers to PPL to Complainant Set I.

6. On April 18, 2019, counsel for PPL Electric left the Complainant a voicemail about trying to resolve the discovery issues informally before filing a Motion to Compel. The Complainant contacted PPL Electric's counsel back. PPL Electric agreed that the Complainant could have until April 22, 2019, to provide his discovery responses.

7. On April 22, 2019, PPL Electric received the Complainant's responses to PPL to Complainant Set I. However, the Complainant refused to provide the information and materials requested in PPL to Complainant Set I, Questions 4 and 7. A true and correct copy of the Complainant's responses PPL to Complainant Set I is attached hereto and marked as **Appendix B**.

8. On April 23, 2019, counsel for PPL Electric left the Complainant a voicemail noting the deficiencies with the Complainant's responses to PPL to Complainant Set I, Nos. 4 and 7.

¹ Because the discovery was served via first-class mail by the United States Postal Service ("USPS"), three days were added to the prescribed period for response. *See* 52 Pa. Code § 1.56(b).

9. On May 14, 2019, counsel for PPL Electric left the Complainant another voicemail informing him that his responses to PPL to Complainant Set I, Nos. 4 and 7 were incomplete and not responsive.

10. To date, the Complainant has never sent complete responses to PPL to Complainant Set I, Questions 4 and 7.

II. MOTION TO COMPEL

11. PPL Electric requests that Administrative Law Judge Elizabeth H. Barnes (“ALJ”) compel responses to PPL to Complainant Set I, Questions 4 and 7.

12. Under 52 Pa. Code § 5.321(c), a party is entitled to obtain discovery of any matter not privileged that is relevant to the pending proceeding, or any matter that is reasonably calculated to lead to the discovery of admissible evidence. Discovery is permitted regardless of whether the information sought “relates to the claim or defense of the party seeking discovery or to the claim or defense of another party.” *Id.*

13. Objections to interrogatories and requests for production of documents must be served within 10 days of the date the discovery was served. 52 Pa. Code §§ 5.342(e), 5.349(d). Objecting parties remain under an obligation to provide timely answers to interrogatories or subparts of interrogatories to which they did not object. *Id.* § 5.342(f). Further, objections must be contained in a document separate from an answer. *Id.* §§ 5.342(c), 5.349(d).²

14. Answers to written interrogatories must “[a]nswer each interrogatory fully and completely unless an objection is made.” *Id.* § 5.342(a)(4). Answers must be served within 20 days after service of the interrogatories. *Id.* § 5.342(d).

² The Complainant did not serve objections to discovery. Therefore, Complainant’s failure to provide full and complete responses to discovery requests operate, in effect, as untimely objections.

15. Similarly, a party shall serve a response to a request for documents within 20 days after the service of the request. *Id.* § 5.349(d). The requesting party may move to compel a response to a request for documents with respect to a failure to respond to the request. *See id.*

16. As explained herein, the Complainant has failed to comply with the Commission's discovery rules by failing to provide full and complete responses to PPL to Complainants Set I, Questions 4 and 7 and produce the documents sought by these requests.

17. For the reasons stated in more detail below, the ALJ should direct the Complainant to answer fully PPL to Complainant Set I, Questions 4 and 7. Moreover, should the ALJ grant PPL Electric's Motion to Compel and the Complainant fail to timely provide full and complete responses to Complainant Set I, Questions 4 and 7, PPL Electric intends to file a Motion for Sanctions pursuant to 52 Pa. Code §§ 5.371(a) and 5.372(a).

A. PPL TO COMPLAINANT SET I, QUESTION 4

18. PPL to Complainant-I-4

- (a) Please state every health condition you claim was caused by a smart meter or will be caused or worsened by the installation of PPL Electric's new smart meter.
- (b) Please provide the date that every health condition identified in subpart (a) began.
- (c) Please provide copies of all your medical records of every health condition identified in subpart (a).
- (d) For each alleged health condition that you do not have medical records for in response to subpart (c), please state whether such condition was diagnosed by a medical professional. If so, please provide the name, address, and telephone number of the medical professional and the date of the diagnosis.
- (e) For each of the alleged health conditions identified in subpart (a), please state whether you have been prescribed any therapy or treatment for the condition by a medical professional. If so, please identify the therapy or treatment,

provide the name, address, and telephone number of the prescribing medical professional, and provide the date the therapy or treatment was prescribed.

19. The Complainant's response to the question states:

N/A Severe headaches. Arrhythmia. Complainant is not required to provide any privileged information pursuant to § 333(d): 52 Pa. Code § 5.321(c).

20. As explained above, Section 5.342(a)(4) requires a party to fully and completely answer an interrogatory. 52 Pa. Code § 5.342(a)(4). In addition, a party has a duty to amend its prior responses to discovery requests when the information contained therein is incomplete. *Id.* § 5.332(2).

21. The response served by the Complainant was non-responsive and incomplete because he claimed that the interrogatory is "not applicable" and that he is "not required to provide any privileged information."

22. However, the Complainant alleges that the new AMI meter will cause, contribute to, or exacerbate adverse health effects.

23. Therefore, his medical records and conditions are highly relevant to this case.

24. Moreover, to the extent that the Complainant has any concerns about confidentiality of his medical information, the Complainant can request that a protective order be entered in this proceeding pursuant to Section 5.365 of the Commission's regulations. *See* 52 Pa. Code § 5.365.

25. Furthermore, Section 5.365(c)(4) states:

Prior to the issuance of a protective order, a party may not refuse to provide information which the party reasonably believes to be proprietary to a party who agrees to treat the information as if it were covered by a protective order until the presiding officer or the Commission issues the order or determines that issuance of the order would not be appropriate. The party claiming the privilege

shall file a petition for protective order under subsection (a) within 14 days of the date the request for information was received

26. Here, PPL Electric has agreed to treat such information as confidential as though it were governed by the terms of a protective order. Thus, under Section 5.365(c)(4), the Complainant cannot refuse to provide this information to the Company.

27. Finally, PPL Electric's written testimony and exhibits were served on April 24, 2019. Therefore, by failing to answer this interrogatory fully within the required timeframe, the Complainant has denied the Company the opportunity to include or address his specific allegations about medical issues in its written testimony.

28. For these reasons, the ALJ should direct the Complainant to answer fully PPL to Complainant Set I, Question 4.

B. PPL TO COMPLAINANT SET I, QUESTION 7

29. PPL to Complainant-I-7 provides:

Please provide copies of all exhibits you intend to present or utilize at the evidentiary hearing in this proceeding. For each exhibit to be used as part of your direct case, please identify the witness who will be sponsoring the exhibit.

30. The Complainant's response to the question states:

I do not anticipate an evidentiary hearing. The documents I would be inclined to attach comprise over 1,000 pages and such a request would be an extreme burden upon complainant at present.

31. The Complainant's response to PPL to Complainant-I-7 was incomplete and non-responsive.

32. In Question 7, PPL Electric is seeking basic documents from the Complainant, namely the exhibits that he intends to present at the evidentiary hearing.

33. Although the Complainant may "not anticipate an evidentiary hearing," the hearing will be held on May 24, 2019.

34. Moreover, to the extent that the Complainant considers this simple request to be burdensome, he never served an objection to this interrogatory. Therefore, he waived any right to object to this interrogatory as being unduly burdensome.

35. Finally, the Complainant is required to serve the ALJ with copies of his exhibits in advance of the hearing. Thus, the Company is simply asking the Complainant to provide it with the same exhibits that he is supposed to provide to the ALJ.

36. For these reasons, the ALJ should direct the Complainant to answer fully PPL to Complainant Set I, Question 7.

III. NOTICE OF INTENT TO SEEK SANCTIONS

37. Upon the motion of a party, the presiding officer may make an appropriate order for sanctions if a party fails to answer or otherwise respond to a discovery request or refuses to obey an order of the presiding officer respecting discovery. *See* 52 Pa. Code § 5.371(a).

38. In ruling upon a motion for sanctions, the presiding officer may, among other things, issue: (1) “[a]n order that the matters regarding which the questions were asked, the character or description of the thing or land, the contents of the paper, or other designated fact shall be taken to be established for the purposes of the action in accordance with the claim of the party obtaining the order”; (2) [a]n order refusing to allow the disobedient party to support or oppose designated claims or defenses, or prohibiting the party from introducing in evidence designated documents, things or testimony”; and (3) “[a]n order striking out pleadings or parts thereof, staying further proceedings until the order is obeyed, or entering a judgment against the disobedient party or individual advising the disobedience.” *Id.* § 5.372(a)(1)-(3).

39. Therefore, to the extent that this Motion is granted and the Complainant fails to answer fully PPL to Complainant Set I, or otherwise comply with the ALJ’s order, PPL Electric

intends to file an appropriate Motion for Sanctions pursuant to 52 Pa. Code §§ 5.371(a) and 5.372(a).

IV. CONCLUSION

For the reasons set forth above, PPL Electric Utilities Corporation respectfully requests that Administrative Law Judge Elizabeth H. Barnes grant this Motion to Compel Responses to Discovery and direct Jeffrey Smiles to answer fully PPL to Complainant Set I, as described above within three (3) days from the date of the order.

Respectfully submitted,



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Michael J. Shafer (ID # 205681)
PPL Services Corporation
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Allentown, PA 18101
Phone: 610-774-2599
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Curtis S. Renner (ID # 326488)
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1901 Pennsylvania Avenue, NW
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Washington, DC 20006
Phone: 202-737-6302
E-mail: crenner@w-r.com

Date: May 14, 2019

Attorneys for PPL Electric Utilities Corporation

APPENDIX A

Interrogatories and Requests for Production of Documents Propounded by PPL Electric Utilities Corporation on Jeffrey Smiles – Set I



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Harrisburg, PA 17101-1601
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Devin Ryan

dryan@postschell.com
717-612-6052 Direct
717-731-1981 Direct Fax
File #: 167945

February 7, 2019

VIA REGULAR MAIL

Jeffrey Smiles
3049 Octagon Avenue
Sinking Spring, PA 19608

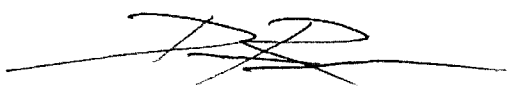
Re: Jeffrey Smiles v. PPL Electric Utilities Corporation
Docket No. C-2018-3003895

Dear Mr. Smiles:

Enclosed are the Interrogatories and Requests for Production of Documents Propounded by PPL Electric Utilities Corporation on Jeffrey Smiles – Set I in the above-referenced proceeding. Copies will be provided as indicated on the Certificate of Service.

Please provide answers to the enclosed discovery within twenty (20) days of the date of service, pursuant to 52 Pa. Code § 5.342.

Sincerely,



Devin Ryan

DTR/kl
Enclosures

cc: Rosemary Chiavetta, Secretary (*Letter & Certificate of Service Only*)
Certificate of Service

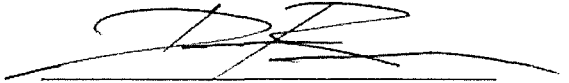
CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been served upon the following persons, in the manner indicated, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

VIA FIRST CLASS MAIL

Jeffrey Smiles
3049 Octagon Avenue
Sinking Spring, PA 19608

Date: February 7, 2019



Devin T. Ryan

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Jeffrey Smiles,	:	
	:	
Complainant	:	
	:	
v.	:	Docket No. C-2018-3003895
	:	
PPL Electric Utilities Corporation,	:	
	:	
Respondent	:	

**INTERROGATORIES AND REQUESTS FOR
PRODUCTION OF DOCUMENTS PROPOUNDED BY
PPL ELECTRIC UTILITIES CORPORATION ON
JEFFREY SMILES – SET I**

Pursuant to 66 Pa.C.S. § 333 and 52 Pa. Code §§ 5.341 *et seq.*, PPL Electric Utilities Corporation (“PPL Electric”) propounds the following Interrogatories and Requests for Production of Documents (hereinafter, “discovery requests”) on Jeffrey Smiles (“Complainant”) – Set I.

INSTRUCTIONS AND DEFINITIONS

1. The “Responding Party,” “you,” or “your” means the party to which these discovery requests are propounded and/or all attorneys, agents, affiliates, subsidiaries, employees, consultants, members, constituents, and representatives acting on behalf of the Responding Party.
2. “Commission” means the Pennsylvania Public Utility Commission.
3. To “identify” a natural person means to state that person’s full name, title or position, employer, last known address, and last known telephone number.

4. To “identify” a business entity means to state the full name of such business, the form of the business, and its location or address.

5. To “identify” a “document” means to provide all of the following information irrespective of whether the document is deemed privileged or subject to any claim of privilege:

- a. The title or other means of identification of each such document;
- b. The date of each such document;
- c. The author, preparer or signer of each such document; and
- d. A description of the subject matter of such document sufficient to permit an understanding of its contents and importance to the testimony or position being examined and the present or last known location of the document. The specific nature of the document should also be stated (*e.g.*, letter, business record, memorandum, computer print-out, etc.).

In lieu of “identifying” any document, it shall be deemed a sufficient compliance with these discovery requests to attach a copy of each such document to the answers hereto and reference said document in the particular interrogatory to which the document is responsive.

6. “Document” means the original and all drafts of all written and graphic matter, however produced or reproduced, of any kind or description, whether or not sent or received, and all copies thereof which are different in any way from the original (whether by interlineation, date-stamp, notarization, indication of copies sent or received, or otherwise), including without limitation, any paper, book, account, photograph, blueprint, drawing, sketch, schematic, agreement, contract, memorandum, press release, circular, advertising material, correspondence, letter, telegram, telex, object, report, opinion, investigation, record, transcript, hearing, meeting, study, notation, working paper, summary, intra-office communication, diary, chart, minutes, index sheet, computer software, computer-generated records or files, however stored, check, check stub, delivery ticket, bill of lading, invoice, record or recording or summary of any telephone or other conversation, or of any interview or of any conference, or

any other written, recorded, transcribed, punched, taped, filmed, or graphic matter of which the Responding Party has or has had possession, custody or control, or of which the Responding Party has knowledge.

7. "Communication" means any manner or form of information or message transmission, however produced or reproduced, whether as a document as herein defined, or orally or otherwise, which is made, distributed, or circulated between or among persons, or data storage or processing units.

8. "Date" means the exact day, month, and year, if ascertainable, or if not, the best approximation thereof.

9. Items referred to in the singular include those in the plural, and items referred to in the plural include those in the singular.

10. Items referred to in the masculine include those in the feminine, and items referred to in the feminine include those in the masculine.

11. The answers provided to these discovery requests should first restate the question asked and identify the person(s) supplying the information.

12. In answering these discovery requests, the Responding Party is requested to furnish all information that is available to the Responding Party, including information in the possession of the Responding Party's attorneys, agents, consultants, or investigators, and not merely such information of the Responding Party's own knowledge. If any of the discovery requests cannot be answered in full after exercising due diligence to secure the requested information, please so state and answer to the extent possible, specifying the Responding Party's inability to answer the remainder, and stating whatever information the Responding

Party has concerning the unanswered portions. If the Responding Party's answer is qualified in any particular, please set forth the details of such qualification.

13. If the Responding Party objects to providing any document requested on any ground, identify such document by describing it as set forth in Instruction 5 and state the basis of the objection.

14. If the Responding Party objects to part of a discovery request and refuses to answer that part, state the Responding Party's objection and answer the remaining portion of that discovery request. If the Responding Party objects to the scope or time period of a discovery request and refuses to answer for that scope or time period, state the Responding Party's objection and answer the discovery request for the scope or time period that the Responding Party believes is appropriate.

15. If, in connection with a discovery request, the Responding Party contends that any information, otherwise subject to discovery, is covered by either the attorney-client privilege, the so-called "attorneys' work product doctrine," or any other privilege or doctrine, then specify the general subject matter of the information and the basis to support each such objection.

16. If any information is withheld on grounds of privilege or other protection from disclosure, provide the following information: (a) every person to whom such information has been communicated and from whom such information was learned; (b) the nature and subject matter of the information; and (c) the basis on which the privilege or other protection from disclosure is claimed.

17. As set forth in 52 Pa. Code § 5.342(g), these discovery requests are continuing, and the Responding Party is obliged to change, supplement, and correct all answers given to conform to new or changing information.

18. "Formal Complaint" means the Formal Complaint filed by the Complainant at Docket No. C-2018-3003895.

**INTERROGATORIES AND REQUESTS FOR
PRODUCTION OF DOCUMENTS PROPOUNDED ON
JEFFREY SMILES – SET I**

PPL to Complainant-I-1

Re: Formal Complaint.

- (a) Please explain in detail the reasons why you are challenging the Company's installation of the new smart meter.
- (b) Please describe in detail all health concerns, if any, raised by the Company's new smart meter, state the bases for such claims, and provide all documents relied upon by you in your response.
- (c) Please describe in detail all safety concerns, if any, raised by the Company's new smart meter, state the bases for such claims, and provide all documents relied upon by you in your response.
- (d) Please describe in detail all privacy concerns, if any, raised by the Company's new smart meter, state the bases for such claims, and provide all documents relied upon by you in your response.
- (e) Please describe in detail all reasons you believe the Company's new smart meter violates the law.

PPL to Complainant-I-2

Please identify all wireless phones, cellphones, microwaves, wireless routers, wifi networks, tablets, computers, Bluetooth speakers, wireless security systems, smart speakers (*e.g.*, Amazon Echo), garage door openers, baby monitors, and walkie talkies that are contained in or used in the house.

PPL to Complainant-I-3

Please state whether you or any member of your household uses a cell phone. If so, please provide the make and model of each cell phone and, for each phone identified, provide 12 months of phone bills or other records of actual cell phone usage.

PPL to Complainant-I-4

- (a) Please state every health condition you claim was caused by a smart meter or will be caused or worsened by the installation of PPL Electric's new smart meter.
- (b) Please provide the date that every health condition identified in subpart (a) began.

- (c) Please provide copies of all your medical records of every health condition identified in subpart (a).
- (d) For each alleged health condition that you do not have medical records for in response to subpart (c), please state whether such condition was diagnosed by a medical professional. If so, please provide the name, address, and telephone number of the medical professional and the date of the diagnosis.
- (e) For each of the alleged health conditions identified in subpart (a), please state whether you have been prescribed any therapy or treatment for the condition by a medical professional. If so, please identify the therapy or treatment, provide the name, address, and telephone number of the prescribing medical professional, and provide the date the therapy or treatment was prescribed.

PPL to Complainant-I-5

Please identify each person you plan to call as a fact witness in this proceeding. For each person, please:

- (a) Provide the person's name, home and business address, background, and qualifications;
- (b) Explain in detail the subject matter(s) on which the witness is expected to testify; and
- (c) Provide the source(s) of information relied upon or referenced by the witness.

PPL to Complainant-I-6

Please identify each person you plan to call as an expert witness in this proceeding. For each person, please:

- (a) Provide the person's name, home and business address, background, and qualifications;
- (b) Explain in detail the subject matter(s) on which the witness is expected to testify;
- (c) Provide the source(s) of information relied upon or referenced by the witness; and
- (d) Provide a copy of the expert witness's current curriculum vitae.

PPL to Complainant-I-7

Please provide copies of all exhibits you intend to present or utilize at the evidentiary hearing in this proceeding. For each exhibit to be used as part of your direct case, please identify the witness who will be sponsoring the exhibit.

APPENDIX B

Jeffrey Smiles's Answers to PPL Electric Utilities Corporation's Interrogatories and Requests for Production of Documents – Set I

3049 Octagon Avenue
Sinking Spring, Pa 19608
Ph: 610-678-0254

April 20, 2019

Devin Ryan
Post & Schell
17 North Second Street
12th Floor
Harrisburg, Pa 17101-1601

RE; Interrogatories, Docket # C—2018-3003895

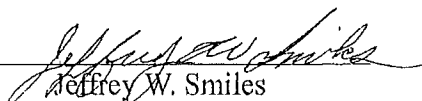
Dear Mr. Ryan:

Enclosed are answers to interrogatories dated April 19, 2019 and postmarked April 20, 2019.

As per our conversation, you requested the interrogatories be received by April 22, 2019 .

I have made every effort to get them to you by the agreed upon date.

Sincerely,


Jeffrey W. Smiles

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Jeffrey Smiles,

Complainant

vs.

PPL Electric Utilities Corporation,

Respondent

Docket No. C--2018-3003895

**RESPONSE/REPLY OF JEFFREY SMILES
TO INTERROGATORY REQUESTS FOR
PRODUCTION OF DOCUMENTS PROPOUNDED BY
PPL ELECTRIC UTILITIES CORPORATION**

Requesting Party: PPL Electric Utilities Corporation

Set No.: 1

Date of Response: April 19 , 2019

I-1 Re: Formal Complaint.

- (a) Please explain in detail the reasons why you are challenging the Company's installation of the new smart meter.
- (b) Please describe in detail all health concerns, if any, raised by the Company's new smart meter, state the: bases for such claims, and provide all documents relied upon by you in your response.
- (c) Please describe in detail all safety concerns, if any, raised by the Company's new smart meter, state the bases for such claims, and provide all documents relied upon by you in your response.
- (d) Please describe in detail all privacy concerns, if any, raised by the Company's new smart meter, state the: bases for such claims, and provide all documents relied upon by you in your response.

(e) Please describe in detail all reasons you believe the Company's new smart meter violates the law.

RESPONSE:

(a) See Complaint:

Health. There are too many health problems associated with these **smart meters**. ... See response (b) for details.

- Privacy. The data collected from **Smart Meters** is detailed private information. ...
- Fire Risk. ...
- Lack of Energy Savings. ...
- Personal Safety. ...
- Legal, Constitutional and Human Rights Violations. ...
- Exorbitant Cost.

(b) EHS symptoms include but are not limited to:

- **Headache,**
- **eye irritation,**
- **nausea,**
- **skin rash**
- **facial swelling,**
- **weakness, fatigue, pain in joints and/or muscles,**
- **buzzing/ringing in ears, (tinnitus)**
- **stabbing pains in head**
- **prickling sensation in head**
- **sense of swelling in eardrums**
- **internal sense of shaking especially of extremities**
- **feeling nervous system 'turned on' sensation of blood racing through veins.**
- **skin numbness,**
- **abdominal pressure and pain,**
- **breathing difficulty**
- **irregular heartbeat**
- **paralysis**
- **balance problems**
- **body and/or muscle spasms,**
- **convulsions**

- **confusion**
- **depression**

© **Military studies** (NGIC- 1147-101-98) ;

The BioInitiative report, updated in 2012 contains nearly 2000 papers reviewed by 29 international scientists from over 20 countries on the health and environmental effects of electromagnetic fields. Their conclusions note that the continued rollout of wireless technologies jeopardizes global health and recommends stricter biologically based standards, lower exposure limits, and a more cautious, science-based approach. www.bioinitiative.org ; Legal, Constitutional and Human Rights Violations of Smart Grid and Smart Meters- Congressional White Paper

(d) The principal privacy and security concerns surrounding installation of residential smart meters are (1) smart meters will reveal the activities of people inside of a home by measuring their electricity, gas, or water usage frequently over time, and (2) that inadequate cyber security measures surrounding the digital transmission of smart meter data will expose it to authorized and unauthorized users of the data.

More specifically, the Electronic Privacy Information Center (EPIC), a non-profit group, has listed on its website the following potential privacy consequences of smart grid and smart meter systems:

1. **Identity Theft**
2. **Determine Personal Behavior Patterns**
3. **Determine Specific Appliances Used**
4. **Perform Real-Time Surveillance**
5. **Reveal Activities Through Residual Data**
6. **Targeted Home Invasions (latch key children, elderly, etc.)**
7. **Provide Accidental Invasions**
8. **Activity Censorship**
9. **Decisions and Actions Based Upon Inaccurate Data**
10. **Profiling**
11. **Unwanted Publicity and Embarrassment**
12. **Tracking Behavior Of Renters/Leasers**
13. **Behavior Tracking (possible combination with Personal Behavior Patterns)**
14. **Public Aggregated Searches Revealing Individual Behavior**

(e) TITLE 66 PUBLIC UTILITIES, violation of health and safety.

Act 129 is preempted by federal law, and, accordingly, PPL Electric Utilities does not have the authority to force installation of a smart meter without consent.

Section 1501 of the Code, 66 Pa. C.S. § 1501 which requires public utilities to maintain adequate, efficient, safe and reasonable service and facilities for their customers is violated

I-2

Please identify all wireless phones, cell phones; microwaves, wireless routers, wifi networks, tablets, computers, Bluetooth speakers, wireless security systems, smart speakers (e.g., Amazon Echo), garage door openers, baby monitors, and walkie talkies that are contained in or used in the house.

RESPONSE:

No wireless networks, tablets computers, bluetooth speakers et al. No garage door opener, baby monitors, walkie talkies.

I-3

Please state whether you or any member of your household uses a cell phone. If so, please provide the make and model of each cell phone and, for each phone identified, provide 12 months of phone bills or other records of actual cell phone usage.

RESPONSE:

No member of household is engaged in the use of cell phones

I-4

(a) Please state every health condition you claim was caused by a smart meter or will be caused or worsened by the installation of PPL Electric's new smart meter.

(b) Please provide the date that every health condition identified in subpart (a) began.

(d) For each alleged health condition that you do not have medical records for in response to subpart (c), please state whether such condition was diagnosed by a medical professional. If so, please provide the name, address, and telephone number of the medical professional and the date of the diagnosis.

(e) For each of the alleged health conditions identified in subpart (a), please state whether you have been prescribed, any therapy or treatment for the condition by a medical professional. If so, please identify the therapy or treatment, provide the name, address, and telephone number of the prescribing medical professional, and provide the date the therapy or treatment was prescribed.

RESPONSE:

N/A Severe headaches. Arrhythmia .Complainant is not required to provide any privileged information pursuant to § 333(d): 52 Pa. Code § 5.321(c).

I-5

Please identify each person you plan to call as a fact witness in this proceeding. For each person, please:

- (a) Provide the person's name, home and business address, background, and qualifications;
- (b) Explain in detail the subject matter(s) on which the witness is expected to testify; and
- (c) Provide the source(s) of information relied upon or referenced by the witness.

RESPONSE:

Fact witnesses not available at the present time.

I-6

Please identify each person you plan to call as an expert witness in this proceeding. For each person, please:

- (a) Provide the person's name, home and business address, background, and qualifications;
- (b) Explain in detail the subject matter(s) on which the witness is expected to testify;
- (c) Provide the source(s) of information relied upon or referenced by the witness; and
- (d) Provide a copy of the expert witness's current curriculum vitae.

RESPONSE:

Unavailable at the present time. Possibly Dr. Gunnar Heuser, but not confirmed.
CV attached. *Dr. David Carpenter NYU*

I-7

Please provide copies of all exhibits you intend to present at the evidentiary hearing in this proceeding. For each exhibit to be used as part of your direct case, please identify the witnesses who will be sponsoring the exhibit.

RESPONSE:

I do not anticipate an evidentiary hearing. The documents I would be inclined to attach comprise over 1,000 pages and such a request would be an extreme burden upon complainant at present.

GUNNAR HEUSER, M.D., Ph.D., F.A.C.P., F.A.C.F.E., B.C.F.E.
CURRICULUM VITAE

CITIZENSHIP: American, January 15, 1965 Cert. #: 8759974

DEGREES, DIPLOMAS and CERTIFICATES:

B.A. (equivalent) University of Heidelberg, August 20, 1946

M.D. University of Cologne, February 11, 1952

Ph.D. University of Montreal, May 30, 1957

Experimental Medicine and Surgery

Fellow, American College of Physicians (FACP), 1969.

Fellow, American Clinical Neurophysiology Society, 1982

Fellow, American College of Forensic Examiners (FACFE), 1995

Diplomate (Internal Medicine) McGill University, 1959

Diplomate, American Board of Forensic Examiners, 1995.

Diplomate, American Board of Forensic Medicine, 1996.

Licentiate of the Medical Council of Canada, November 27, 1958

ECFMC (no. 4532) April 4, 1961

Licensed to practice medicine in California (A-20853), 1963

Board Certified, American Board of Forensic Examiners, 1995

RESEARCH POSITIONS:

Research Assistant, Institute of Experimental Medicine and Surgery University of Montreal, 1952 - 1955

Research Associate, Institute of Experimental Medicine and Surgery University of Montreal, 1955 - 1956

Junior Research Anatomist, Department of Anatomy U.C.L.A., 1959 - 1961

Assistant Research Anatomist, Department of Anatomy U.C.L.A., 1962 - 1970

Member, Brain Research Institute, UCLA, 1966 - 1970

CLINICAL POSITIONS:

Junior Intern (rotating), Royal Victoria Hospital (affiliated with McGill University), Montreal, 1956 - 1957

Junior Assistant Resident, Department of Medicine, Royal Victoria Hospital, Montreal 1957 - 1958

Assistant Resident, Department of Medicine Royal Victoria Hospital, Montreal, 1958 - 1959

Resident, Department of Medicine Harbor General Hospital, Torrance, California, 1961 - 1962
Resident, Department of Medicine Mount Sinai Hospital, Los Angeles, California, 1962 - 1963
Assistant Professor of Medicine (Endocrinology) in Residence U.C.L.A., Los Angeles, California, 1964 - 1970
Clinical Neurophysiologist, Clinical Neurophysiology Program Brain Research and Neuropsychiatric Institutes, U.C.L.A., Los Angeles, California, 1967 - 1970
Clinical Attending Physician Pain Management Center U.C.L.A., Los Angeles, California, 1982 - 1985
Assistant Clinical Professor of Medicine, U.C.L.A. School of Medicine, U.C.L.A., Los Angeles, California, 1970 to 2011

HOSPITAL AFFILIATIONS:

Department of Medicine, U.C.L.A. Assistant Clinical Professor of Medicine Los Angeles, California
Cedars-Sinai Medical Center Medical Staff Member (Emeritus) Los Angeles, California
Jewish Home for the Aged Consultant (Neurology) (until 1977) Reseda, California
Westlake Medical Center Medical Staff Member (Consultant) (until 1996) Westlake, California
Los Robles Regional Medical Center Medical Staff Member (until 1977) Thousand Oaks, California
Santa Monica Medical Center Consulting Staff Member (until 1976)
Santa Monica, California St. John's Hospital and Health Center
Medical Staff Member (until 1977)
Santa Monica, California Woodview Calabasas Neuropsychiatric Hospital
Staff Member (Internal Medicine) (until 1977) Calabasas, California
Century City Hospital Medical Staff Member (until 1976) Century City, California
Veterans Administration Hospital, Long Beach, California Physician, Consultant in Clinical Neurophysiology (until 1970)

SOCIETY MEMBERSHIPS (Past and Present):

American Medical Association (AMA)
American College of Physicians (ACP) (Fellow)
American Board and College of Forensic Examiners
American Physiological Society
New York Academy of Sciences
American Academy of Clinical Neurophysiology
American Clinical Neurophysiology Society (Fellow)
Society for Psychophysiological Research
Los Angeles Society of Neurology and Psychiatry, Inc.(until January 1986)

Southern California Head Injury Foundation, Member, Board of Directors (until 1990)
Society for Occupational and Environmental Health
California Epilepsy Society, Member, Board of Directors (until 1985)
American Association for the Study of Headaches and National Headache Foundation American Pain Society, Charter Member
American Academy for Auricular Medicine and Scientific Acupuncture (until 1992)
American Association for Chronic Fatigue Syndrome Endocrine Society
American Association of Clinical Endocrinologists
International Society of Psychoneuroendocrinology (until 1978)
International Society for the Advancement of Respiratory Psychophysiology
National Association of Physicians for the Environment
International Society of Occupational Medicine and Toxicology
Undersea and Hyperbaric Medical Society

PUBLICATIONS:

BOOKS

1. Selye, H. and Heuser, G. Annual Report of Stress. Acta, Inc. Medical Publishers: Montreal. 1954
2. Selye, H. and Heuser, G. Annual Report of Stress. Acta, Inc. Medical Publishers: Montreal. 1955-56.
3. Brambilla, F.; Bridges, P.K.; Endroczi, E. and Heuser, G. Perspectives in Endocrine Psychobiology. Akademiai Kiado: Budapest. 1978

PAPERS

1. Heuser, G. Stress and Entzündung. Die Medizinische, No. 1, p. 13. 1954.
2. Selye, H. and Heuser, G. Experimental Studies Concerning the Role of Hormonal, Vascular and Nervous Factors in the Regulation of the "Anaphylactoid" Reaction of the Rat. Int. Arch. Allergy, 5:52. 1954.
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4. Heuser, G. & Dufour, D. Experimental Studies on the Development of Inflammation after Interference with the Blood Supply. Acta Neurovegetativa, 10:259. 1954.
5. Heuser, G. Experimental Anesthesia and Convulsions with Steroids. Revue Canad. de Biologie, 17:229. 1958.
6. Heuser, G. and Eidelberg, G. Steroid Induced Convulsions in Experimental Animals. Endocrinology, 69:916. 1961.
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- Caudate-Cortical Pathways. EEG Clin. Neurophysiol., 13:519. 1961.
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 14. Heuser, G; Ling, G.M. and Kluver, M. Sleep Induction by Progesterone in the Pre-optic Area in Cats. EEG Clinical Neurophysiology, 22:122. 1967.
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- Neurotoxicology. Internatl. J. Occup. Med. Tox., 1: V to X. 1992.
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61. Heuser, G., Heuser, SA. Functional brain MRI in patients complaining of electrohypersensitivity after long term exposure to electromagnetic fields. *Reviews on Environmental Health*. Published online July 5, 2017.

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