

May 13 2019

C-2018-3004770

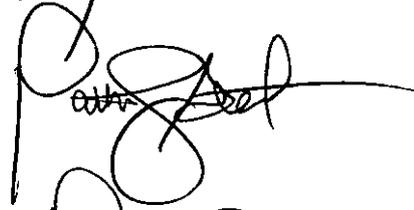
To Whom It may concern

It is not true that I did not respond to Intraplay questions. I asked for an extension due to declining health along with sudden death of my father 1/31/19. I heard no response back until recently. A letter from Toni L Geister I enclosed copies of letters sent to Sec.

Rosemary Chizvetta 400 N. St. and Fl.

Harrisburg, Pa 17120 on 1/31/19 sent by registered letter

Thank You
Sincerely



Patricia J. Steeh

610 926 8868

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MAY 13 2019

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

I do not accept that I need to have a smart meter on my property

Due to health conditions I know it will be harmful to my health conditions for which I am disabled for. Thank You.

SMART¹ METER EFFECTS

Dr. Martin Pall, Professor Emeritus in Biochemistry and Molecular and Cell Biology, quickly addressed three significant documented health effects from electronic meters.

"Dr. Martin Pall Testimony: Health Effects of Wireless Massachusetts Statehouse 2017" June, 20, 2017, <https://www.youtube.com/watch?v=9qfJyzD4j7c>, 2:43 min. Testimony given during a hearing on Massachusetts Senate Bill 1864: No Fee Opt Out for Smart Meters.

"I'm Martin Pall, I'm Professor Emeritus at Washington State University. I live in Portland Oregon. I've been giving talks on EMF effects, one just recently in New Haven [Connecticut] and I'll be giving two talks shortly in Spain. So, I've published six papers on how electromagnetic fields impact the cells of our bodies. So ... my comments are going to be focussed specifically on smart meters. There're many different health effects that have been extensively documented as being caused by EMFs. Most of them have never been looked at with smart meters, but three of them have been, and they've all been reported to be occurring at very substantial levels in response to smart meters. And those are: that there're widespread neuropsychiatric effects; there are cardiac effects on the electrical control of the heart – those are life-threatening because the arrhythmias that occur can be, are often associated with sudden cardiac death; and then finally, there's electromagnetic hypersensitivity, which has just been referred to.² Those three have all been reported to occur in response to smart meters.

Now the smart meters were put out, as are all wireless communication devices, without any biological testing whatsoever, safety testing whatsoever. The guarantees of safety that the industry has put forth is based on an assumption that only thermal, that is, only heating effects can occur. And there's been data from thousands of studies, going all the way back to the 1950s that that's not true, OK, that there are many non-thermal* effects, including the three that I just talked about. So, I think there should be no question that smart meters have biological effects. *[non-thermal = non-x-ray, non-ionizing, non-heating]

Now there're some other issues here that are important. One is that pulsed fields – fields that pulse up and down – are much more biologically active in most cases than non-pulsed fields, or continuous wave fields. Smart meters are highly pulsed, and therefore they are problematic for that reason, as well.

And, so, and let me just say, everything I say here will be denied by industry, I guarantee it. This is what the science says. Thank you."

[¹The generic term, 'smart meter,' takes in the range of electronic utility meters that are designed to be able to collect usage data and communicate it via wireless WiFi. In his comment, Dr. Pall is referring to electronic communicating/transmitting meters that emit pulsed spikes of wireless WiFi frequencies four or more times per minute 24/7. If you enter the model of an electronic meter, you will find it identified as a member of the given manufacturer's line or family of 'smart' meters: to the manufacturer, they are all 'smart' meters.

As regards the health impacts of electronic meters, controversy over nomenclature is of no importance. Even if they don't emit overt wireless radiation they still constitute both short and long-term health hazards. This is because all electronic meters generate and dump aberrant 'noise' frequencies – known in industry as Dirty Electricity (DE) – onto the indoor circuits and the downstream power supply. These frequencies create electromagnetic fields (EMFs) that are hazardous to humans, animals and plants, and also shorten the life of appliances and electronic equipment. And, though hard to believe, electronic meters are not UL-approved and do not have surge arrestors or circuit breakers in them to protect circuits, equipment and structures in the event of a incident involving the electronic meter or the utility wires – while our reliable and trusted non-electronic, mechanical-analog meters do have surge arrestors and do not need a circuit breaker. Fires caused by electronic meters are being reported – something which is unheard of with mechanical-analog meters. And it appears that homeowners insurance doesn't necessarily cover fires caused by electronic meters. Also, our trusty mechanical-analog meters rarely need replacement, unlike electronic meters. Certified and certifiable mechanical-analog meters are cheap and readily available without reliance on 'major' manufacturers.

²Hear the other testimonies given at this hearing, 14:25 min.: "S.1864 Massachusetts Statehouse Hearing on Smartmeters June 20, 2017." Environmental Health Trust, <https://www.youtube.com/watch?v=-c-20ymHhXM>. Dr. Pall presents second.]

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MAY 13 2019

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

This article is just one of the many
Concerning Safety of Smart meters available
Inclosed here
Pall

JAN 31 2019

Dear Sec Chiavetta,

Please file this letter requesting extended time to answer the Interrogatory questions I have received until at least May 15 2019 due to the unexpected death of my Dad and my declining health. Thank You

Sincerely,
Patricia Steady

Patricia J Steady
1116 RAINBOW AVE
READING PA 19605
610 926 8868

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MAY 13 2019

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

May 13 2019

Please show me all of the studies
done to date that smart meters and EMF's
are safe and that there are no problems
or health issues due to using smart meters
and continued EMF's.

Thank You

Sincerely

Patricia J. Stehly

Patricia J. Stehly

1116 RAINBOW AVE
READING PA 19605

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MAY 13 2019

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

Tori L. Giesler, Esq.
(610) 921-6658
(330) 315-9263 (Fax)

610-929-3601

January 15, 2019

VIA FIRST CLASS MAILPatricia J. Steely
1116 Rainbow Avenue
Reading, PA 19605**RECEIVED**

MAY 13 2019

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU**Re: Patricia J. Steely v. Metropolitan Edison Company**
Docket No. C-2018-3004770

Dear Ms. Steely:

Enclosed please find the Interrogatories and Requests for Production of Documents (Set I) to Patricia J. Steely. Pursuant to 52 Pa. Code §§ 5.341 and 5.349, *et seq.*, your answers are due within twenty days of service of this letter (February 4, 2019). In addition, any objections are due within ten days of service of this letter (January 25, 2019). This document has been served as indicated within the Certificate of Service.

Very truly yours,



Tori L. Giesler

Enclosures

c: As Per Certificate of Service
The Honorable Jeffrey A. Watson, Public Utility Commission (Cover Letter and Certificate)
Rosemary Chiavetta, Esq., Public Utility Commission (Cover Letter and Certificate)

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

PATRICIA J. STEELY

v.

METROPOLITAN EDISON COMPANY

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Docket No. C-2018-3004770

**INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS OF
METROPOLITAN EDISON COMPANY TO PATRICIA J. STEELY, SET I**

Metropolitan Edison Company hereby propounds these Interrogatories and Requests for Production of Documents (Set I) to Patricia J. Steely (the "Complainant"). Telephone or other contact concerning availability and timing of formal responses is encouraged. The answer to each interrogatory should be started on a new page. The answers should restate the question asked and indicate the person(s) supplying the information.

Pursuant to 52 Pa. Code § 5.342, you must send your answers to me within 20 days (February 4, 2019) and objections within 10 days (January 25, 2019). Your answers and objections should not be filed with the Pennsylvania Public Utility Commission. You should only file the cover letter and certificate of service, with the Commission's Secretary Rosemary Chiavetta and send a copy to Administrative Law Judge Jeffrey A. Watson. If you have any objection to any of the interrogatories or the request for documents, please identify the interrogatory or request and state your objection in full as to why you should not have to answer/produce it. Any objection not raised within the 10-day period provided for by 52 Pa. Code § 5.342(c) will be deemed waived and you will not be permitted to raise the objection at a later time.

Dated: January 15, 2019

INSTRUCTIONS

A. In answering these Interrogatories and Requests for Production of Documents, please furnish all information available to you, including any such information possessed by others that you can obtain, and not merely such information known of your own personal knowledge. If you cannot answer the Interrogatories and Requests in full after exercising due diligence to secure the information to do so, so state and answer to the extent possible.

B. Other than for the reasons identified herein, you must provide an answer to all Interrogatories and Requests for Production of Documents. If the answer to the question is “none” or “unknown,” such statement must be written in the answer. If you consider the question to be inapplicable, “N/A” must be written in the answer. If an answer is omitted because of a claim of privilege, the basis of privilege is to be stated.

C. If the answer to any of the Interrogatories and Requests for Production of Documents is that you lack knowledge of some or all of the requested information, describe all efforts made by you to obtain the information necessary to answer that Interrogatory or Request.

D. These Interrogatories and Requests for Production of Documents are to be deemed continuing in nature, and you shall promptly supply, by way of supplemental response, any additional responsive information that may become known to you or anyone acting on your behalf after your answers have been prepared or served.

E. As used herein, the terms “Complainant” and “you” refer to Patricia J. Steely and her attorneys, agents, or representatives.

F. As used herein, the terms “Company” or “Respondent” refer to Metropolitan Edison Company, and any agent, agency, or affiliate thereof.

G. As used herein, the term “proceeding” refers to the instant complaint proceeding at the Pennsylvania Public Utility Commission at Docket No. C-2018-3004770.

H. As used herein, the terms “service location,” “property,” or “home” refer to your service address of 1116 Rainbow Avenue, Reading, PA 19605.

I. As used herein, the term “household” refers to you and all other individuals who reside at the service location.

J. As used herein, the terms “document” or “documentation” includes any written, printed, typed, recorded, or graphic matter, whether produced or reproduced or stored on paper, cards, tapes, film, electronic facsimile, computer storage devices or any other devices or media, including, but not limited to papers; books; letters; photographs; objects; tangible things; correspondence; e-mails; websites; webpages; telegrams; cables; telex messages; memoranda; medical records; notes; notations; records; work papers; transcripts; minutes; reports and recordings of telephone or other conversations, or of interviews, or of conferences, or of other meetings; affidavits; statements; opinions; proposals; reports; surveys; plans; studies; analyses; audits; evaluations; contracts; agreements; journals; statistical records; invoices; receipts; desk calendars; appointment books; diaries; lists; tabulations; summaries; sound recordings; computer printouts; data processing input and output; microfilms; all records kept by electronic, photographic, or mechanical means; and things similar to any of the foregoing, however denominated. When one or more of the foregoing documents is requested or referred to, the request or reference shall include, but is not limited to, the original and each and every copy and draft thereof having writings, notations, corrections, or markings unique to such copy or draft.

K. As used herein, all other words are to be given their ordinary and usual meanings, according to a current edition of Webster’s Dictionary.

INTERROGATORIES OF METROPOLITAN EDISON COMPANY TO PATRICIA J. STEELY, SET I

1. Are you claiming that the installation of a smart meter at your property would cause or contribute to an adverse health condition for any member of your household?

Yes

2. If the answer to question 1 is yes, please provide the following information for each household member whose health you claim will be affected:

a. Name; Patricia Steely (myself)

b. Age; 56

c. The specific health condition that you believe would be caused by or contributed to as a result of the smart meter being installed;

d. Whether the household member is already experiencing the specific health condition and, if so, the date on which the condition was first experienced and the date on which the condition was first diagnosed by a medical doctor;

e. Whether the household member has experienced the specific health condition within the last four years;

f. Any medication prescribed to the household member; and

g. Whether the household member has visited a medical professional for the specific health condition, and if so, the name, address, and phone number of the medical professional and the date of the visit(s) to the medical professional.

h. Whether a medical doctor has determined that the installation of a smart meter would cause or contribute to the specific health condition;

i. Any other health conditions that the household member has experienced or is experiencing and when each condition was first experienced and was first

diagnosed by a medical doctor. *Disabled since 2008 Aug 5th. Unable to work due to. As a nurse.*

3. Please explain how the installation of a smart meter would cause or contribute to a health condition for any person in your household. Be as specific as possible.

4. Please provide the following information regarding your view that the installation of a smart meter at your home would cause or contribute to a health condition for

any person in your household. *As below. There is more than a bit of information that smart meters are not safe.*

a. Please identify each document you rely on in support of your position.

b. Do you intend to rely on these documents at the time of the hearing in this proceeding?

c. Please describe in detail all information you have to support this position.

5. Do you believe the installation of a smart meter at your property would create safety concerns for a member of your household? *Yes*

Already have health conditions and I have been sensitive to EMF's & WIFI

6. If the answer to question 5 is yes, please specifically identify each of your safety concerns related to smart meters.

I turn off all TV Computers Cell phones when not in use.

Unable to sleep with wifi & EMF turned

on
Noticeable for years while in stores and places it is on at all times

7. If the answer to question 5 is yes, Please provide the following information regarding your position that the installation of a smart meter would create safety concerns:
- Please identify each document you rely on in support of the position.
 - Do you intend to rely on these documents at the time of the hearing in this proceeding? The information that is established that smart meters are not safe to the cells of body.
 - Please describe in detail all information you have to support this position. I will bring or send more info if needed. Some enclosed here.
 - Do you have any relevant educational or work background that qualifies you to assert this position? I am disabled due to health issues for 10 years.
 - If yes, please identify the relevant educational or work background that qualifies you to assert this position. Prior to this I was employed as nurse for county nursing home.
8. Are there any cordless phones used in your home?
- For each cordless phone in your home, please provide the name of the phone manufacturer and the model.
9. Do you use a cellular phone? For emergency 2nd as needed mostly use traditional home line for phone calls.
- If yes, please provide the names of the cell phone manufacturer and model (for example, Apple i-Phone 7S).
 - Does anyone else in your home use a cellular phone? NO
 - How many cellular phones are in use at your home? 6 1 as stated above for emergency or when away from home

d. For each cellular phone used by a member of your household, please provide the name of the cell phone manufacturer and the phone model. 

10. Is there satellite television at your home? **No**

a. If yes, please provide the name of the satellite television provider (for example, Direct TV).

b. If yes, where is your satellite disk located? **None**

11. Is there a laptop computer at the service location? **NO**

a. If yes, where is it located?

12. Do you have a wifi network in your home?

*rather available
Turned off 211 but
short periods when used*

a. If so, where is your wifi router located?

*Spine bedroom
Turned off except when
in use*

13. Is it your position that you would like to opt out completely from smart meter installation?

Yes

14. Do you believe the installation of a smart meter at your property would violate the privacy or security of a member of your household?

*I am very sensitive to wifi and EMF's this is not new
headaches fatigue nausea unable to sleep
It would affect my health by decreasing wellness*

15. If the answer to question 14 is yes, please specifically describe each of your concerns regarding your household's privacy or security after the installation of a smart meter.

As I have explained in prior questions

16. If the answer to question 14 is yes, please provide the following information regarding your position that the installation of a smart meter would violate your household's privacy or security:

a. Please identify each document you rely on in support of the position.

b. Do you intend to rely on these documents at the time of the hearing in this proceeding? *yes*

c. Please describe in detail all information you have to support this position.

Answered in questions

d. Do you have any relevant educational or work background that qualifies you to assert this position? *As answered in prior questions*

I am a nurse. Disability I have research and meetings on subjects

e. Is yes, please identify the relevant educational or work background that qualifies you to assert this position. *As above*

I stay up to date on issues and concerns.

17. To your knowledge, has a smart meter been installed by the Company at your property? *March 27 I noticed a new meter*

is installed still has analog look with questionable bottom of meter.

18. Please describe in detail how you believe a smart meter operates.

It does have constant GPRS

19. In your complaint, you state that "I do not want a smart meter AMI installed due to health issues." Please provide the following information related to this statement:

a. What documents do you rely on in support of this statement?

b. Do you intend to rely on these documents at the time of the hearing in this proceeding? *yes*

- c. Please describe in detail the information you have to support this statement.
20. Please list the specific issues you intend to raise at the hearing in this proceeding.
21. Please identify the legal support, including specific citations, for each issue identified in question 20.
22. Please list the factual support for each issue identified in question 20.
Information answered in prior questioning
23. Please provide the following information for all witnesses you intend to call to testify at the hearing in this proceeding.
myself others in similar situations with smart meter -
- a. Provide the full name of the witness.
 - b. Provide the address and telephone number of the witness.
 - c. Provide the title or position held by the witness.
 - d. Provide the educational background of the witness.
 - e. Provide the employment background of the witness.
 - f. Provide the scope of the testimony for the witness.
24. Would any witness identified in question 23 be offered as an expert?
- a. If yes, provide the curriculum vitae of the witness and a summary of the testimony the expert witness is expected to provide.
25. Please describe in detail your educational background.
- a. Please list any relevant certificates, trainings, or degrees that you obtained.

- b. Please provide a description of the certificate, training, or degree.
 - c. Please provide the date that any certificate, training, or degree was obtained.
 - d. Please provide the name and address of the institution which provided the certificate, training, or degree.
26. Please describe in detail your employment history.
- a. Please provide your employer name and address.
 - b. Please provide the title of your position.
 - c. Please provide the dates of your employment.
 - d. Please provide the duties performed in your position.

**REQUESTS FOR PRODUCTION OF DOCUMENTS OF METROPOLITAN EDISON
COMPANY TO PATRICIA J. STEELY, SET I**

27. Please provide copies of all documentation supporting your position that the installation of a smart meter at your home would cause or contribute to an adverse health condition in any member of your household.
28. Please provide copies of all documentation associated with visits by members of your household to a medical professional related to the health conditions identified in question 2, including but not limited to any and all medical records, medical visit reports, and notes and letters from medical doctors or other health care professionals.
29. Please provide copies of all documentation you intend to refer to at the hearing in this proceeding related to smart meters and/or radio frequency fields and health.
30. Please provide copies of all documentation supporting your position that smart meters would create safety issues for you or members of your household.
31. Please provide copies of all documentation you intend to refer to at the hearing in this proceeding related to the safety concerns of smart meters.
32. For each cellular telephone used by a member of your household, please provide a complete copy of the bills you received from your cellular telephone provider for the past 12 months.

33. Please provide copies of all documentation supporting your position that smart meters would violate the privacy or security of your household.
34. Please provide copies of all documentation you intend to refer to at the hearing in this proceeding supporting your position that smart meters would violate the privacy or security of your household.
35. Please provide copies of all documentation supporting your position that your household may opt out of smart meter installation.
36. Please provide copies of all documentation you intend to refer to at the hearing in this proceeding supporting your position that a household may opt out of smart meter installation.
37. Please provide a copy of all proposed exhibits you intend to submit for the hearing in this proceeding.
38. Please provide copies of all documentation you are relying upon in support of your positions in this proceeding.

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

PATRICIA J. STEELY

v.

METROPOLITAN EDISON COMPANY

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Docket No. C-2018-3004770

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the Interrogatories and Requests for Production of Documents of Metropolitan Edison Company to Patricia J. Steely upon the individuals listed below, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

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

Patricia J. Steely
1116 Rainbow Avenue
Reading, PA 19605

Dated: January 15, 2019

 Tori L. Giesler / KBW

Tori L. Giesler
Attorney No. 207742
FirstEnergy Service Company
2800 Pottsville Pike
P.O. Box 16001
Reading, Pennsylvania 19612-6001
(610) 921-6658
tgiesler@firstenergycorp.com

Counsel for Metropolitan Edison Company

Pat Steely
 1116 Rainbow Ave.
 Reading, PA 19605



1007



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 PATRICIA J. STEELY
 1116 RAINBOW AVE
 READING PA 19605

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PO ZIP Code Scheduled Delivery Date (MM/DD/YY) Postage
 19560 5-14-19 \$25.50

Date Accepted (MM/DD/YY) Scheduled Delivery Time Insurance Fee COD Fee
 5-13-19 12 NOON \$ \$

Time Accepted 10:30 AM Delivery Fee Return Receipt Fee Live Animal Transportation Fee
 8:40 AM \$ \$2.80 \$

Special Handling/Fragile Sunday/Holiday Premium Fee Total Postage & Fees
 \$ \$ 28.30

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Delivery Attempt (MM/DD/YY) Time Employee Signature
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 PM

Delivery Attempt (MM/DD/YY) Time Employee Signature
 AM
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SIGNATURE REQUIRED Note: The mailer must check the "Signature Required" box if the mailer: 1) Requires the addressee's signature; OR 2) Purchases additional insurance; OR 3) Purchases COD service; OR 4) Purchases Return Receipt service. If the box is not checked, the Postal Service will leave the item in the addressee's mail receptacle or other secure location without attempting to obtain the addressee's signature on delivery.
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 400 N. St.
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