

Lynn Force
1387 University Drive
State College, PA 16801
814-237-0578

May 6, 2019

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

Re: Lynn Force v. West Penn Power Company
Docket No. C-2017-2634987

Dear Secretary Chiavetta:

Enclosed is the Motion to Compel of Lynn Force with regard to the above-captioned case. This document has been served on counsel for West Penn Power Company as shown in the Certificate of Service.

Please contact me if you have any questions.

Sincerely,
Lynn Force
Lynn Force

Enclosures

cc: As per Certificate of Service

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Before the
Pennsylvania Public Utility Commission

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Lynn Force

v.

West Penn Power Company

Docket No. C-2017-2634987

Notice to Plead

To: Lauren M. Leptoski, Esq., Tori L. Giesler, Esq.
West Penn Power Company

Pursuant to 52 Pa. Code § 5.102(b), you are hereby notified that, if you do not file a written response denying or correcting the enclosed Motion to Compel of Lynn Force within five (5) days from the service of the Notice, the facts set forth by Lynn Force in the Motion may be deemed to be true, thereby requiring no other proof. All pleadings, such as a Reply to Motion, must be filed with the Secretary of the Pennsylvania Public Utility Commission, with a copy service to Lynn Force, and where applicable, the Administrative Law Judge presiding over the case.

File with:

With a copy to:

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

The Honorable Jeffrey A. Watson
Pennsylvania Public Utility Commission
Piatt Place, Suite 220
301 Fifth Avenue
Pittsburgh, PA 15222

With a copy to:

Lynn Force
1387 University Drive
State College, PA 16801

Date: May 6, 2019

~~Lynn Force~~
Lynn Force

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PA PUC
SECRETARY'S BUREAU

Before the
Pennsylvania Public Utility Commission

Lynn Force

v.
West Penn Power Company

Docket No. C-2017-2634987

Motion of Lynn Force to Compel Responses to
Interrogatories and Document Requests

To the Pennsylvania Public Utility Commission:

Lynn Force files this Motion to compel West Penn Power Company to provide full and complete responses to interrogatories and document requests issued by Lynn Force on March 18, 2019.

On March 18, 2019, I served interrogatories and requests for production of documents on West Penn Power. (Exhibit A) Objections were due March 28, 2019, and Answers, April 8, 2019.

As I discussed in my Status Report of April 30, 2019, answers were received April 22, 2019. (Enclosed are cover letters dated April 19, 2019, and April 10, 2019, and certificate of service dated April 10, 2019 - there is no later certificate of service to show the Commission the error.) (Exhibit B)

I called West Penn Power on both April 23, 2019, and April 24, 2019, and got Kaitlyn, who answered the phone for both Ms. Giesler and Ms. Lepkoski. I left messages to please call me about questions regarding interrogatories.

Having not received a call back, I called again on the afternoon of April 25, 2019, and Ms. Lepkoski answered. Since answers to question numbers 1-5 were missing, I asked if they filed objections to numbers 1-5. She said yes. I said I didn't receive them, where were they sent - she said to the State College address. (Also to note, the Mount Pleasant address is not any address familiar to me.) She sent the objections to me, and I received them April 26, 2019. (Exhibit C) (Note address on the cover letter but correct address on the certificate of service - never received until April 26, 2019, when Ms Lepkoski sent them.) So their objections, dated April 1, were not received until April 26, 2019. As I said in my Status Report, I'm then left trying to explain this.

Although not having yet seen their objections, I explained to her in our conversation on the 25th, the reason for wanting those answers because of what I had seen on British physicist Barrie Trower's Facebook Page, "Humanity at the Brink," and told her where to access this information, and I summarized it for her. That page states "Telecom and Insurance Companies Warn of Liability and Risk." Under "Lloyd's of London Underwriter in 2015" "The Electro-magnetic Fields Exclusion is a General Insurance Exclusion and is applied across the market as standard. The purpose of the exclusion is to exclude cover for illnesses caused by continuous long-term non-ionizing radiation exposure i.e. through mobile phone usage." Also, "Canadian Pro-Suicide Architects & Engineers Policy Example of

another EMF exclusion. In 2015 the General Exclusions section of their Canadian Professional Architects & Engineers Policy Document places EMF on the same footing as Asbestos: a total exclusion on liability for all EMF radiation."

I also placed this source in the mail to her with some other sources in a second set of updates, dated April 27, 2019, to my Answers to their Interrogatories.

I also told Ms. Lepkoski that I had given them everything I had, and they were giving me nothing with regard to some of the questions to which they did provide answers. For instance, in my Interrogatory numbers 7 and 8 I asked what biological testing has been done with regard to the safety of your smart meter and to provide copies of the documentation regarding the biological safety testing performed. See their response, provided by John Ahr (Exhibit D). It's not responsive to my question. I asked her to provide further information responsive to this question. I noted that Martin Pall states in his testimony before the Massachusetts State House (testimony of June 20, 2017, on p. 5 of my Reply to Answer and New Matter of West Penn Power Company to the Complaint of Lynn Force, "Now the smart meters were put out, as are all wireless communication devices, without any biological testing whatsoever, safety testing whatsoever. Uh 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 1950s that that's not true, okay, that there are many non thermal effects including the three that I just talked about. Uh so I think there should be no question that, uh, that smart meters have biological effects."

Additionally, I told her when I had called West Penn Power in November 2017, when trying to stop them from shutting off my electricity over the smart meter refusal, a recording I took note of while I was on hold said that the meters were tested and proven by manufacturers to be safe and secure, so I asked her, would she respond, exactly what testing are you relying on when you say these meters are safe, what biological testing was done in response to my question, and if none, say so, and say what testing was done, not by West Penn Power, but by whoever you are relying on in your assertions of safety.

I have received no updated information with regard to any other answers I brought up with her. (Perhaps that will take more time and will still be coming.)

On Friday afternoon, May 3, 2019, I called Mrs. Kepkoski and left a message on her voicemail that I received and looked at their objections and I didn't agree with them. If she was willing to have discussion on this with me, please return my call. Now I'm questioning whether their April 1 filing date for objections is even considered timely since it's 14 days from March 18. (My Certificate of Mailing on March 18 is Exhibit F)

I have received no return call. My conversation with her on April 25, 2019, was nice enough, but I did not expect to receive a return call to discuss these objections. I believe the answers to the objected to questions, if they are what I think they will be, are too damaging to their argument of safety and reasonableness and it is simply not in their interest to provide them. Those answers go to issues number 2 and 3 of the issues I would raise at a hearing in this proceeding. In West Penn Power's Interrogatories to me: "9. Please list the specific issues you intend to raise at the hearing in this proceeding." My answer to that interrogatory is enclosed (Exhibit E).

No matter that two of West Penn Power's experts have curricula vitae the thickness of phone books, if these answers are what I suspect they will be, they will provide a compelling inference in favor of my claims in my issues number 2 and number 3. (Exhibit E)

In the fall of 2018, I met with both of my state legislators, Representative Scott Conklin, and Senator Jake Corman, to explain the difficulties that individuals face fighting for our rights to be free from this forced wireless smart meter exposure. Jake Corman said that he had children, and he wanted to know my sources. I provided him with what I had up to that point. He said that West Penn Power would be liable if they caused harm from these meters. (The implication

being that liability can bring caution, a reasonable person might assume.)

But if their liability policy contains exclusions for physical harm caused to customers by their wireless smart meters, why would they still continue with this, unless they were also granted some sort of exemption from liability for such harm, which I believe that telecommunications companies like Verizon have been.

This information is obviously very relevant to my issues in this case. Whether there are policy exemption clauses is highly relevant to the safety issue Issue number 2 (Exhibit E). And if West Penn Power has been granted some exemption from liability for harm caused to customers by these wireless meters, then that information makes the desired inference also more probable in my third issue than it would be without this evidence. I need to know if the law, to our detriment, has somehow exempted West Penn Power from liability for physical harm caused to customers from these wireless meters. (Issue number 3 Exhibit E)

So a compelling argument can be made that my rights that are well recognized under international law to be free from being forced into this experiment upon my health in this manner, without my informed consent, are being violated. That laws in this country are not protective does not negate my rights, well recognized under international law, which I continue to assert. My issue number 3 is the issue I am most interested in.

I argue that § 1501 of Title 66 of the Pennsylvania Code must be interpreted in a way consistent with, and not to detract from, these rights well recognized under international law. Any provision of electric service involving a derogation from rights well recognized under international law could never be considered to be safe and reasonable. So the answer to my Interrogatory number 5 goes to whether West Penn Power is being aided in carrying out this program against us, by internal laws that are granting it free reign. There seems to be nothing reigning these people in. And all their actions are as though they have free reign over us. Anything goes here. This must end. I don't know whether others have brought these arguments to the court. They should be bringing them.

For many years, my husband, David, operated his own construction business. If a customer were to ask him to provide proof of his business's liability insurance coverage, he would certainly provide proof of that without delay.

Here, our lives are at stake.

David also tells me that his liability and workmen's compensation insurance has to be on record with any township in which he builds a home before he can get a building permit.

I was conflicted whether to file this motion, because I believe I will be moving before a hearing

date, and I will have no further legal interest in this claim once I move, and it is therefore wasteful of all of our time. I am however, under a time period to file a motion to compel their objected to answers, while still attempting to obtain discovery informally, so I am fighting this until the time that the threat to my right to be free of this second wireless West Penn Power meter installation on my kitchen wall ends, which it has not presently. And I am not afraid to fight.

West Penn Power wishes to fight me, but they refuse to provide me with relevant information that only they have.

So I will leave it in your hands, Judge Watson, whether you wish to rule on this motion presently. Should you do so, I ask that West Penn Power be directed to provide full and complete responses to the discovery requests after entry of an Order Granting the Motion to Compel.

In the event that West Penn Power is directed by the Commission but fails to respond to my discovery requests, I also respectfully ask that I be granted the relief to be left alone and free of the threat of installation of a second wireless smart meter until I move from this temporary, leased premises.

I certify that I have done everything I can reasonably do to get these answers. I don't believe any discussion with regard to the objected

to discovery requests is likely or would be productive for the reason I have stated above. (And that is, I believe, simply that these answers are too favorable to my case and too damaging to theirs, so they will not be given to me.) They must remain in control of the false narrative that this program is safe and reasonable.

Dated: May 6, 2019

Sincerely,
~~Lynn Force~~
Lynn Force
1387 University Drive
State College, PA 16801
814-237-0578

LynnForce
1387 University Dr.
State College, PA 16801

(814) 237-0578

March 18, 2019

Lauren M. Lepkosti, Esq.
FirstEnergy Service Company
2800 Fottsville Pike
P.O. Box 16001
Reading, PA 19612-6001

RECEIVED
2019 MAY -8 AM 10:29
PA PUC
SECRETARY'S BUREAU

Re: LynnForce v. West Penn Power Company
Docket No. C-2017-2634987

Dear Ms. Lepkosti:

Enclosed please find the Interrogatories and Requests for Production of Documents to West Penn Power. Your answers are due within twenty days of service of this letter (April 8, 2019). In addition, any objections are due within ten days of service of this letter (March 28, 2019). This document has been served as indicated within the Certificate of Service.

Very truly yours,
LynnForce
Lynn Force

Enclosures

cc: The Honorable Jeffrey Watson, PUC (Certificate)
Rosemary Chiavetta, Esq. PUC (Cover Letter and Certificate)

Before the
Pennsylvania Public Utility Commission

Dated: March 18, 2019

Lynn Force

v.

West Penn Power Company

Docket No. C-2017-2634987

Interrogatories and Requests for Production of Documents of
Lynn Force to West Penn Power Company

Lynn Force sends these Interrogatories and Requests for Production of Documents to West Penn Power Company.

Start the answer to each interrogatory on a new page. The answers should restate the question asked and indicate the person(s) supplying the information.

Send answers within 20 days April 8, 2019
and objections within 10 days March 28, 2019.

If you have any objection to any of the interrogatories or the request for documents, identify the interrogatory or request and state your objection in full as to why you should not have to answer/produce it.

Follow the same instructions you gave me in your Interrogatories and Requests for Production of Documents pp. 2-3 A. through K.

Interrogatories and Requests for Production of Documents of Lynn Force to West Penn Power Company

1. Do you have an insurer that would be responsible for paying customer claims for health complaints that arise from your wireless smart meters?
2. Does your policy contain an exemption from such claims?
3. State the insurer's full name, address, and phone number.
4. If you do not have an insurer that would be responsible for claims involving effects of radiofrequency radiation upon customers from your smart meters, why don't you? Explain in detail and also provide a copy of the relevant policy exemption clause.
5. Are you exempt by law from responsibility for such claims?
6. Specifically, what make of wireless smart meter do you use?

7. What biological testing has been done with regard to the safety of your smart meter?
8. Provide copies of the documentation regarding the biological safety testing performed.
9. Provide copies of all documentation related to the biological safety of wireless smart meters which you intend to refer to at the hearing in this proceeding.
10. Provide copies of all documentation you are relying upon in support of your positions in this proceeding.
11. Provide factual support for your position that wireless smart meters are safe - on what do you rely to make this assertion?
12. Provide the following information for all witnesses you intend to call to testify at the hearing in this proceeding:
 - a) Provide the full name of the witness.
 - b) Provide the contact information 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 testimony of the witness.

If provided in full in your March 1, 2019 mailing, state such.

13. Would any witness identified in the question above be offered as an expert?

14. If yes, provide the curriculum vitae of the witness.

15. Provide copies of all documentation related to the safety of wireless smart meters regarding health that you intend to refer to at the hearing in this proceeding.

Before the
Pennsylvania Public Utility Commission

Lynn Force

v.

West Penn Power Company

Docket No. C-2017-2634987

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 Lynn Force to West Penn Power Company 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, as follows:

Lauren M. Lepkosti

First Energy Service Company

2800 Pottsville Pike

P.O. Box 16001

Reading, Pennsylvania 19612-6001

Dated: March 18, 2019

Lynn Force
Lynn Force
1387 University Drive
State College, PA 16801



Exhibit B

2800 Pottsville Pike
PO Box 16001
Reading, PA 19612-6001

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

April 19, 2019

VIA FIRST CLASS MAIL

Lynn Force
1387 University Drive
State College, PA 16801

Re: Lynn Force v. West Penn Power Company
Docket No. C-2017-2634987

Dear Ms. Force:

Due to an oversight in addressing the original mailing to you, the Responses of West Penn Power Company to the Interrogatories, Set I, propounded by Lynn Force with regard to the above-referenced proceeding originally mailed on April 10, 2019 were returned to me due to being incorrectly addressed. I have enclosed those responses here.

Should you have any questions or concerns, please do not hesitate to contact me.

Very truly yours,

Tori L. Giesler / KBW
Tori L. Giesler

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SECRETARY'S BUREAU

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

April 10, 2019

VIA FIRST CLASS MAIL

Lynn Force
200 Brook Hollow Road
Mount Pleasant, PA 15666

Re: Lynn Force v. West Penn Power Company
Docket No. C-2017-2634987

Dear Ms. Force:

Enclosed please find a copy of the Responses of West Penn Power Company to the Interrogatories, Set I, propounded by Lynn Force with regard to the above-referenced proceeding.

Should you have any questions or concerns, please do not hesitate to contact me.

Very truly yours,


Tori L. Giesler

cc: Rosemary Chiavetta, Secretary (Cover Letter and Certificate of Service only, via e-filing)
The Honorable Jeffery A. Watson (Cover Letter and Certificate of Service only, via first class mail)

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

LYNN FORCE

v.

WEST PENN POWER COMPANY

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Docket No. C-2017-2634987

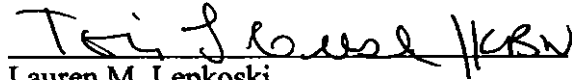
CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the Responses of West Penn Power Company to the Interrogatories, Set I, propounded by Lynn Force upon the individual listed below, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

Service by First Class Mail as follows:

Lynn Force
200 Brook Hollow Road
Mount Pleasant, PA 15666

Dated: April 10, 2019



Lauren M. Lepkoski

Tori L. Giesler

FirstEnergy Service Company

2800 Pottsville Pike

P.O. Box 16001

Reading, Pennsylvania 19612-6001

(610) 921-6203

(610) 921-6658

llepkoski@firstenergycorp.com

tgiesler@firstenergycorp.com

Counsel for West Penn Power Company

Exhibit C

FirstEnergy.

2800 Pottsville Pike
PO Box 16001
Reading, PA 19612-6001

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

April 1, 2019

VIA FIRST CLASS MAIL

Lynn Force
200 Brook Hollow Road
Mount Pleasant, PA 15666

Re: Lynn Force v. West Penn Power Company
Docket No. C-2017-2634987

Dear Ms. Force:

Attached please find the Objections of West Penn Power Company to the Interrogatories and Request for Production of Documents of Lynn Force to West Penn Power Company, Set I, Interrogatory Nos. 1 through 5 in the above-referenced matter. This document has been served as shown in the Certificate of Service.

Please contact me if you have any questions.

Very truly yours,



Tori L. Giesler

Enclosures

cc: As Per Certificate of Service
Administrative Law Judge Jeffrey Watson (Cover Letter and Certificate of service)
Rosemary Chiavetta, Esq., Public Utility Commission (Cover Letter and Certificate of service via electronic filing)

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**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

LYNN FORCE

v.

WEST PENN POWER COMPANY

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Docket No. C-2017-2634987

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the Objections of West Penn Power Company to the Interrogatories and Request for Production of Documents of Lynn Force to West Penn Power Company, Set I, upon the individual 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:

Lynn Force
1387 University Drive
State College, PA 16801

Dated: April 1, 2019



Lauren M. Lepkoski
Tori L. Giesler
FirstEnergy Service Company
2800 Pottsville Pike
P.O. Box 16001
Reading, Pennsylvania 19612-6001
(610) 921-6203
(610) 921-6658
llepkoski@firstenergycorp.com
tgiesler@firstenergycorp.com

Counsel for West Penn Power Company

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

LYNN FORCE

v.

WEST PENN POWER COMPANY

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:
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:

Docket No. C-2017-2634987

**OBJECTIONS TO THE INTERROGATORIES AND REQUESTS FOR PRODUCTION
OF LYNN FORCE TO WEST PENN POWER COMPANY, SET I**

TO THE PENNSYLVANIA PUBLIC UTILITY COMMISSION:

Pursuant to 52 Pa. Code § 5.342(c), West Penn Power Company (“West Penn” or the “Company”) objects to the Interrogatories and Request for Production of Documents propounded by Lynn Force (“Complainant”) via first class mail dated March 18, 2019 (“Complainant Set I Discovery Requests”). The Company avers as follows:

I. Background

1. On November 20, 2017, the Complainant filed a Formal Complaint with the Pennsylvania Public Utility Commission (“Commission”) regarding 1387 University Drive, State College, Pennsylvania 16801 (“Service Location”) under Account No. 100126419546 (“Account”) which was electronically served on the Company on November 22, 2017.

2. On December 12, 2017, the Company filed its Answer and New Matter denying the material allegations. On the same day, the Company also filed Preliminary Objections to the Formal Complaint.

3. On December 23, 2017, the Complainant filed a response to the Preliminary Objections as well as a reply to the Company’s Answer and New Matter.

4. On January 26, 2018, a Motion Judge Assignment Notice was issued where the parties were informed that Administrative Law Judge (“ALJ”) Jeffrey A. Watson was assigned to rule on the Company’s Preliminary Objections.

5. On August 8, 2018, ALJ Watson issued an Order, which denied the Company’s Preliminary Objections and ordered that the docket proceed to a hearing.

6. On August 9, 2018, ALJ Watson issued an Interim Order and an Initial Telephonic Prehearing Conference Notice scheduling a prehearing conference for August 24, 2018.

7. On August 20, 2018, in accordance with 52 Pa. Code § 5.341, the Company forwarded to the Complainant interrogatories and document requests (“Company’s Discovery Requests”) via first class mail. In the Company’s Discovery Requests, the Company sought information and documents related to the Complainant’s allegations regarding the Company’s smart meters.

8. On August 24, 2018, ALJ Watson convened the prehearing conference with the parties wherein a settlement was reached between the parties.

9. On August 27, 2018, the Company filed a Certificate of Satisfaction.

10. On August 30, 2018, the Company received a letter dated August 27, 2018 from the Complainant with objections to the Company’s Discovery Requests.

11. On September 1, 2018, the Complainant filed an objection to the Certificate of Satisfaction.

12. On September 6, 2018, the Company filed a letter advising that the Complainant informed counsel for the Company that she was no longer agreeable to the settlement reached on August 24, 2017. Further, the Company filed a Motion to Compel the Complainant to respond to the Company’s Discovery Requests.

13. On September 13, 2018, the Complainant filed reply to the Company's Motion to Compel.

14. The Complainant provided responses to the Company's Discovery Requests.

15. On December 13, 2018, the Company filed a letter withdrawing its Motion to Compel given that the Complainant provided her responses to the Company's Discovery Requests.

16. On January 7, 2019, an Interim Order Establishing Initial Litigation Schedule was issued which set forth the schedule for discovery, the identification of witnesses, and filing of motions in this proceeding.

17. By letter dated March 18, 2019, the Complainant issued Complainant's Set I Discovery Requests to the Company.

II. Objections

18. In responding to the Complainant's Discovery Requests, the Company does not waive any objections to the admissibility, relevancy, materiality, confidentiality, or privilege attached to any document, communication, or information.

19. Numerous of the Complainant's Discovery Requests seek information or documents that is wholly objectionable, and the Company objects to it in its entirety. Specifically, the Company objects to Lynn Force Interrogatories and Request for Production of Documents Set I, Nos. 1 through 5 as follows:

LYNN FORCE
v.
WEST PENN POWER COMPANY
Docket No. C-2017-2634987

Force Interrogatory Set I, No. 1

Do you have an insurer that would be responsible for paying customer claims for health complaints that arise from your wireless smart meters?

OBJECTION:

This Discovery Request is vague, ambiguous, overly broad, irrelevant, unduly burdensome, outside the scope of this proceeding, and not reasonably calculated to lead to the discovery of admissible evidence, as it seeks information beyond that which relates to smart meters. Information related to the nature of the Company's insurance coverage is wholly irrelevant to the Complainant and the issues raised within the Formal Complaint or expected to be addressed at any hearing in this matter and is therefore not discoverable.

LYNN FORCE
v.
WEST PENN POWER COMPANY
Docket No. C-2017-2634987

Force Interrogatory Set I, No. 2

Does your policy contain an exemption from such claims?

OBJECTION:

This Discovery Request is vague, ambiguous, overly broad, irrelevant, unduly burdensome, outside the scope of this proceeding, and not reasonably calculated to lead to the discovery of admissible evidence, as it seeks information beyond that which relates to smart meters. Information related to the nature of the Company's insurance coverage is wholly irrelevant to the Complainant and the issues raised within the Formal Complaint or expected to be addressed at any hearing in this matter and is therefore not discoverable.

LYNN FORCE
v.
WEST PENN POWER COMPANY
Docket No. C-2017-2634987

Force Interrogatory Set I, No. 3

State the insurer's full name, address, and phone number.

OBJECTION:

This Discovery Request is vague, ambiguous, overly broad, irrelevant, unduly burdensome, outside the scope of this proceeding, and not reasonably calculated to lead to the discovery of admissible evidence, as it seeks information beyond that which relates to smart meters. Information related to the nature of the Company's insurance coverage is wholly irrelevant to the Complainant and the issues raised within the Formal Complaint or expected to be addressed at any hearing in this matter and is therefore not discoverable.

West Penn Power Company's Objections to
Force Interrogatories Set I, No. 4

LYNN FORCE
v.
WEST PENN POWER COMPANY
Docket No. C-2017-2634987

Force Interrogatory Set I, No. 4

If you do not have an insurer that would be responsible for claims involving effects of radiofrequency radiation upon customers from your smart meters, why don't you? Explain in detail and also provide a copy of the relevant policy exemption clause.

OBJECTION:

This Discovery Request is vague, ambiguous, overly broad, irrelevant, unduly burdensome, outside the scope of this proceeding, and not reasonably calculated to lead to the discovery of admissible evidence, as it seeks information beyond that which relates to smart meters. Information related to the nature of the Company's insurance coverage is wholly irrelevant to the Complainant and the issues raised within the Formal Complaint or expected to be addressed at any hearing in this matter and is therefore not discoverable.

LYNN FORCE
v.
WEST PENN POWER COMPANY
Docket No. C-2017-2634987

Force Interrogatory Set I, No. 5

Are you exempt by law from responsibility for such claims?

OBJECTION:

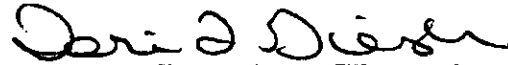
This Discovery Request is vague, ambiguous, overly broad, irrelevant, unduly burdensome, outside the scope of this proceeding, and not reasonably calculated to lead to the discovery of admissible evidence, as it seeks information beyond that which relates to smart meters. Information related to the nature of the Company's tort liability is wholly irrelevant to the Complainant and the issues raised within the Formal Complaint or expected to be addressed at any hearing in this matter and is therefore not discoverable.

III. Conclusion

WHEREFORE, for the foregoing reasons, West Penn Power Company objects to Complainant's Discovery Requests, Set I, Interrogatory Nos. 1 through 5.

Respectfully submitted,

Dated: April 1, 2019



Lauren M. Lepkoski
Attorney No. 94800
Tori L. Giesler
Attorney No. 207742
FirstEnergy Service Company
2800 Pottsville Pike
P.O. Box 16001
Reading, Pennsylvania 19612-6001
(610) 921-6203
(610) 921-6658
llepkoski@firstenergycorp.com
tgiesler@firstenergycorp.com

Counsel for West Penn Power Company

Exhibit D

West Penn Power Company Response to
Lynn Force Interrogatory Set I, No. 7
Witness: John Ahr

LYNN FORCE
v.
WEST PENN POWER COMPANY
Docket No. C-2017-2634987

Force Interrogatory Set I, No. 7

What biological testing has been done with regard to the safety of your smart meter?

RESPONSE:

West Penn Power Company has not performed such testing.

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LYNN FORCE
v.
WEST PENN POWER COMPANY
Docket No. C-2017-2634987

Force Interrogatory Set I, No. 8

Provide copies of the documentation regarding the biological safety testing performed.

RESPONSE:

See West Penn Response to Force Interrogatory Set I, No. 7.

Exhibit E

#9. 1, Lynn Force, list the specific issues that I intend to raise at the hearing in this proceeding as follows:

1) Vest Penn Power Company is abusive in its authority regarding its smart meter "deployment" program.

2) Imposing a smart meter on a necessary service, particularly without the ability to opt out violates the obligation to provide safe and reasonable service under § 1501 of Title 66 of the Pennsylvania Code.

3) Imposing smart meters upon a necessary service without the ability to opt out violates rights and principles recognized by international law arising from the Nuremberg Tribunal / Code / Principles / Charter / Treaty. This unethical forced exposure amounts to experimentation without informed consent, and an argument can be made, possibly quite successfully, that it reaches the threshold of crimes against humanity. People are simply not expendable for some intended greater good, whatever that is supposed to be here.

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Exhibit F

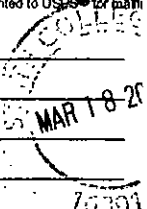
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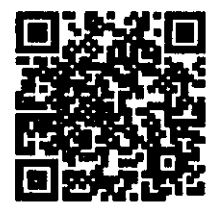
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Before the
Pennsylvania Public Utility Commission

Lynn Force

v.
West Penn Power Company

Docket No. C-2017-2634987

Certificate of Service

I hereby certify that I have this day served a true copy of the Motion to Compel of Lynn Force upon the individuals listed below in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

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Reading, PA 19612-6001

The Honorable Jeffrey Watson
Pennsylvania Public Utility Commission
Piatt Place, Suite 220
301 Fifth Ave.
Pittsburgh, PA 15222

Dated: May 6, 2019

Lynn Force
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