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Devin Ryan

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717-612-6052 Direct  
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File #: 167945

May 23, 2019

***VIA ELECTRONIC FILING***

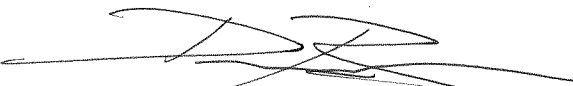
Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street, 2nd Floor North  
P.O. Box 3265  
Harrisburg, PA 17105-3265

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

Dear Secretary Chiavetta:

Enclosed for filing is the Motion in Limine of PPL Electric Utilities Corporation to Prohibit the Complainant from Presenting any Expert Witnesses, Medical Records, and Health, Safety, or Privacy-Related Exhibits 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 23, 2019

A handwritten signature in black ink, appearing to read "Devin T. Ryan", written over a horizontal line.

Devin T. Ryan

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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


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**NOTICE TO PLEAD**

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YOU ARE HEREBY ADVISED THAT, PURSUANT TO 52 PA. CODE § 5.103(c), YOU MAY FILE A REPLY TO THE ENCLOSED MOTION WITHIN TWENTY (20) 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.

Kimberly A. Klock (ID # 89716)  
Michael J. Shafer (ID # 205681)  
PPL Services Corporation  
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Allentown, PA 18101  
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Date: May 23, 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.	:	

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**MOTION IN LIMINE OF  
PPL ELECTRIC UTILITIES CORPORATION TO  
PROHIBIT THE COMPLAINANT FROM PRESENTING  
ANY EXPERT WITNESSES, MEDICAL RECORDS, AND  
HEALTH, SAFETY, OR PRIVACY-RELATED EXHIBITS**

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**TO ADMINISTRATIVE LAW JUDGE ELIZABETH H. BARNES:**

PPL Electric Utilities Corporation (“PPL Electric” or the “Company”) hereby files this Motion in Limine pursuant to the Pennsylvania Public Utility Commission’s (“Commission”) regulations at 52 Pa. Code § 5.103 and requests that Administrative Law Judge Elizabeth H. Barnes (the “ALJ”) prohibit Jeffrey Smiles (“Complainant”) from presenting any expert witnesses, medical records, and health, safety, or privacy-related exhibits because the Complainant has failed to meet the deadlines to provide his written expert testimony and exhibits and to respond to discovery requests for this information.

In this proceeding, the Complainant generally has alleged that the installation of the new automated metering infrastructure (“AMI”) meter poses health, safety, and privacy concerns. In discovery, the Complainant identified two “potential” expert witnesses and claimed to have over 1,000 pages worth of exhibits to support his allegations contesting the new AMI meter’s

installation. However, the Complainant never confirmed that he would be presenting any expert testimony, never provided written testimony for the purported “potential” expert witnesses, refused to provide any of his exhibits, and refused to provide any of his medical records. As explained herein, the Complainant’s failure to provide these documents violated the Commission’s discovery regulations, the ALJ’s Prehearing Order, or both.

Due to the Complainant’s actions, or lack thereof, PPL Electric would be severely prejudiced and denied due process if the Complainant were permitted to present expert witness testimony, medical records, or exhibits for the first time at the evidentiary hearing. Therefore, PPL Electric respectfully requests that the ALJ grant the instant Motion in Limine and prohibit the Complainant from presenting any expert witnesses, presenting any medical records, or introducing into evidence any exhibits related to alleged health effects, safety risks, or privacy risks from AMI meters.

In support thereof, the Company states as follows:

**I. BACKGROUND**

1. PPL Electric is a public utility that provides electric distribution and provider of last resort services in Pennsylvania subject to the regulatory jurisdiction of the Commission. PPL Electric furnishes electric distribution, transmission, and provider of last resort electric supply services to approximately 1.4 million customers throughout its certificated service territory, which includes all or portions of 29 counties and encompasses approximately 10,000 square miles in eastern and central Pennsylvania.

2. On August 8, 2018, PPL Electric was served with the Formal Complaint filed by the Complainant.

3. On August 28, 2018, PPL Electric filed its Answer to the Complaint.

4. On September 10, 2018, a notice was issued scheduling a telephonic evidentiary hearing for March 8, 2019.

5. Also on September 10, 2018, the ALJ issued the Prehearing Order, which, among other things, directed the Complainant to serve his exhibits and written expert testimony and exhibits on or before January 10, 2019.<sup>1</sup>

6. 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**. The Complainant never served any objections to PPL to Complainant Set I.

7. On February 19, 2019, a notice was issued rescheduling the telephonic evidentiary hearing for May 24, 2019. Like with the September 10, 2018 hearing notice, it stated:

If you have any hearing exhibits to which you will refer during the hearing, three (3) copies must be sent to the Administrative Law Judge and one (1) copy each must be sent to every other party. All copies **must be received** at least five (5) business days **before** the hearing.

(emphasis in original).

8. 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**.

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<sup>1</sup> This due date was approximately 60 days before the prior hearing date of March 8, 2019. Therefore, PPL Electric would have considered any exhibits and expert written testimony timely served if it was approximately 60 days before the rescheduled hearing on May 24, 2019. However, even after the hearing was rescheduled for May 24, 2019, the Complainant still never served any written expert testimony or any exhibits.

9. On April 24, 2019, PPL Electric served its written direct testimony and exhibits.

10. On May 14, 2019, PPL Electric filed a Motion to Compel responses to PPL to Complainant Set I, Questions 4 and 7.

11. To date, the Complainant has yet to provide any written expert testimony and any exhibits, including medical records.

## **II. MOTION IN LIMINE**

12. PPL Electric respectfully requests that the ALJ grant the instant Motion in Limine and prohibit the Complainant from presenting any expert witnesses, medical records, and health, safety, or privacy-related exhibits because the Complainant has failed to meet the deadlines to provide his written expert testimony and exhibits and to respond to discovery requests for this information.

13. The Formal Complaint raises several complex scientific, medical, safety, and privacy issues related to the planned installation of PPL Electric's new AMI meter on the Complainant's premises, including alleged adverse safety and health effects of the new AMI meter.

14. Since September 10, 2018, when the Prehearing Order was issued, the Complainant has been directed to serve any written expert testimony and exhibits on PPL Electric in advance of the evidentiary hearing.

15. Therefore, the Complainant has had ample notice and knowledge that if he intended to present any expert witnesses at the evidentiary hearing, he would need to serve the expert witnesses' testimony and exhibits by the established deadlines.

16. Furthermore, in his discovery responses, the Complainant identified two potential expert witnesses: (1) Dr. Gunnar Heuser; and (2) Dr. David Carpenter.

17. However, the Complainant refused to provide any medical records and any of his alleged thousands of pages of exhibits that supposedly support his allegations, even though he never objected to the Company's discovery requests.

18. As a result, the Complainant has failed to serve any written expert testimony and any exhibits as required by the Prehearing Order, the February 19, 2019 hearing notice, and the Commission's discovery regulations.

19. In contrast, PPL Electric served all of its written direct testimony and exhibits on April 24, 2019, well before the May 24, 2019 hearing.

20. Thus, although the Complainant has all of the Company's direct testimony and exhibits, PPL Electric currently has none of the Complainant's expert witnesses' testimony and exhibits, nor does the Company know what, if any, exhibits the Complainant will try to introduce into the record.

21. To preserve due process and to avoid litigation by ambush, it is necessary to prohibit the Complainant from presenting any expert witnesses, medical records, and health, safety, or privacy-related exhibits for the first time at the evidentiary hearings.

22. Indeed, if the Complainant were permitted to present any expert witnesses at the evidentiary hearings, PPL Electric would be without basic and critical information about the expert witnesses, their opinions and scientific theories, and the basis for their expert opinions. Likewise, PPL Electric would not have a full and fair opportunity to review any health, safety, or privacy-related exhibits and investigate the claims made therein.

23. Therefore, under these circumstances, PPL Electric would be severely prejudiced in its ability to present evidence and testimony in rebuttal.

24. Furthermore, it would be fundamentally unfair to permit the Complainant to present any expert witnesses, medical records, or health, safety, or privacy-related exhibits because the Complainant has advance copies of the Company's written testimony and exhibits.

25. Indeed, PPL Electric's expert testimony and exhibits address the complex scientific and medical issues raised by the Formal Complaint.


26. To prevent this undue prejudice and denial of due process, the Complainant should be prohibited from presenting any testimony and exhibits from these purported expert witnesses, from introducing any medical records, and from presenting any health, safety, or privacy-related exhibits for the first time at the evidentiary hearings.

27. For these reasons, PPL Electric respectfully requests that the ALJ grant the instant Motion in Limine and prohibit: (1) any expert witnesses from testifying on behalf of the Complainant at the evidentiary hearings; and (2) the Complainant from introducing into evidence any exhibits related to medical conditions and alleged health effects, safety risks, or privacy risks from AMI meters.

### III. CONCLUSION

WHEREFORE, PPL Electric Utilities Corporation respectfully requests that Administrative Law Judge Elizabeth H. Barnes grant this Motion in Limine and (1) prohibit any expert witnesses from testifying on behalf of Complainant Jeffrey Smiles and (2) prohibit Complainant from introducing into evidence any exhibits related to medical conditions and alleged health effects, safety risks, or privacy risks from AMI meters, because Complainant has failed to provide his written expert testimony and exhibits in advance of the evidentiary hearing.

Respectfully submitted,



Kimberly A. Klock (ID # 89716)  
Michael J. Shafer (ID # 205681)  
PPL Services Corporation  
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[mjshafer@pplweb.com](mailto:mjshafer@pplweb.com)

Devin T. Ryan (ID # 316602)  
Garrett P. Lent (ID # 321566)  
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Date: May 23, 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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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

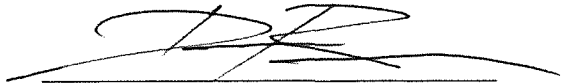
**CERTIFICATE OF SERVICE**

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	:	

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

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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**

2019

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

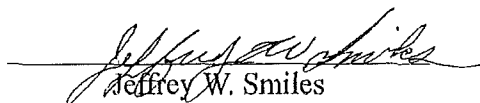
Dear Mr. Ryan:

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**

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**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](http://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.

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**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.

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**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.

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**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.

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**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.

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**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.

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**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.
3. Hoene, H.; Rindani, T. and Heuser, G. Influence of Somatotrophic Hormone and Hydrocortisone Acetate on the Production of Hemolytic Antibodies in the Rat. American Journal of Physiology, 177:19. 1954.
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.
7. Buchwald, N.A.; Wyers, E.J.; Okoma, T. and Heuser, G. The "Caudate Spindle:" I. Electrophysiological Properties. EEG Clin. Neurophysiol., 13:509. 1961.
8. Heuser, G.; Buchwald, N.A. and Wyers, E.J. The "Caudate Spindle:" II. Facilitatory and

- Caudate-Cortical Pathways. EEG Clin. Neurophysiol., 13:519. 1961.
9. Buchwald, N.A.; Heuser, G; Wyers, E.J. and Lauprecht, C.W. The "Caudate Spindle:" III. Inhibition of the "Caudate Spindle" by High Frequency Stimulation of Subcortical Structures. EEG Clin. Neurophysiol., 13:515. 1961.
  10. Buchwald, N.A.; Wyers, E.J.; Lauprecht, C.W. and Heuser, G. The "Caudate Spindle:" IV. A Behavioral Index of Caudate-Induced Inhibition. EEG Clin. Neurophysiol., 13:531. 1961.
  11. Buchwald, N.A. ; Rakic, L; Wyers, E.J.; Hull, C. and Heuser, G. Integration of Visual Impulses and the "Caudate Loop." Exper. Neurol., 5:1. 1962.
  12. Heuser, G.; Ling, G.M. and Buchwald, N.A. Sedation or Seizures as Dose-dependent Effects of Steroids. Arch. Neurol., 13:1095. 1965.
  13. Heuser, G. Effects of Steroids on Inhibitory Activity Within the Central Nervous System. In: Anesthesiology and the Nervous System. J.B. Dillon and C.M. Ballinger, eds. University of Utah Press, Utah. 1966.
  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.
  15. Heuser, G. Induction of Anesthesia, Seizures and Sleep by Steroid Hormones. Anesthesiology, 28:173. 1967.
  16. Kales, A; Heuser, G.; Jacobson, A.; Kales, J.D.; Zweizig, J.R. and Paulson, M.G. All Night Sleep Studies in Hypothyroid Patients, Before and After Treatment. Journal of Clinical Endocrinology and Metabolism, 27:1593. 1967.
  17. Heuser, G. Sleep-wakefulness Patterns and Hormones. A Study of Behavioral, Electroencephalographic and Extracellular "Multiple Unit" Activities. In: Endocrine Aspects of Disease Processes, G. Jasmin, ed. Warren H. Green, Inc., St. Louis MO, p. 160. 1968.
  18. Heuser, G. Hormones and Sleep. In: Clinical Aspects of Recent Sleep-Dream Research, A. Kales, ed. Annals of Internal Medicine, 68:1078. 1968.
  19. Adams, D.A.; Rand, R.W.; Roth, N.; Dashe, A.M. Heuser, G.; Hanley, J. and Parker, M. Cryoablation of the Pituitary in the Treatment of Progressive Diabetic Retinopathy. Diabetes, 17:634-640. Oct. 1968.
  20. Heuser, G; Rand, R.W.; Carr, E.M. and Kiredjian, G.M. Extracellular Unit Recording from the Thalamus in Chronically Implanted Patients with Movement Disorders. Bulletin Los Angeles Neurological Society, 34:56. 1969.
  21. Rand, R.W.; Heuser, G.; Dashe, A.M. and Adams, D.A. Stereotaxic Transsphenoidal Biopsy and Cryosurgery of Pituitary Tumors. Am. J. Roentgenol., Radiation Therapy and Nuclear Medicine, 105:273-286. 1969.
  22. Roth, N.G.; Rand, R.W.; Adams, D.A.; Heuser, G.; Dashe, A.M.; Hanley, J. and Gold, J. Cryohypophysectomy and Diabetic Retinopathy. Symposium on the Treatment of Diabetic Retinopathy, M.F. Goldberg and S. Fine, ed. U.S. Dept. HEW publication. No. 1890. 1969.
  23. Heuser, G. Therapeutic Recommendations for the Clinical use of CNS-active Drugs. In: Drug Dependency: Clinical Investigations of Stimulants and Depressants, A. Kales, ed. Annals Internal Medicine, 70:609-611. 1969.
  24. Heuser, G., ed., Clinical Neurophysiology: Newer Diagnostic and Therapeutic Methods in Neurological Disease and Behavior Disorders. Annals Internal Medicine, 71:619-645. 1969.

25. Heuser, G. New Approaches to Old Problems in Neurology and Psychiatry. *Annals Internal Medicine*, 71:640-644. 1969.
26. Heuser, G.; Batzdorf, U.; Bentson, J.R.; Blank, N.; Dashe, A.M.; Hepler, R.S.; Rand, R.W.; Roth, N.H.; Rubenstein, M.K.; Schechter, J. and Simmer, H.H. Trends in Clinical Neuroendocrinology. *Annals Internal Medicine*, 73:783-807. 1970.
27. Heuser, G. Discussion: Steroid Hormones and Brain Function. U.C.L.A. Forum in Medical Sciences, No. 15. University of California Press Berkeley. Los Angeles, London, pp. 351-353. 1971.
28. Wilson, C.B.; Rand, R. W.; Grollmus, J. M.; Heuser, G.; Levin, S; Goldfield E.; Schneider, V.; Linfoot, J. and Hosobuchi, Y. Surgical Experience with a Microscopic Transsphenoidal Approach to Pituitary Tumors and Non- neoplastic Parasellar Conditions. *California Medicine*, 117:1-9. 1972.
29. Rand, R.W. and Heuser, G. and Adams, D.A. Stereotaxic Cryohypophysectomy: Ten Years Experience with Pituitary Tumors. *Excerpta Medica, Amsterdam International Congress series No. 303. Proceedings of a Conference, Bethesda, Md, Jan. 15-17. 1973.*
30. Rand, R.W. and Heuser, G. Treatment of Acromegaly by Cryohypophysectomy. *Recent Progress in Neurological Surgery. Excerpta Medica, Amsterdam, pp. 92-97, International Congress series No. 320. Fifth International Congress of Neurological Surgery, Tokyo, October 7-14. 1974.*
31. Adams, D.A.; Rand, R.W.; Roth, N.H.; Dashe, A.; Gipstein, R. M. and Heuser, G. Hypophysectomy in Diabetic Retinopathy: The Relationship Between the Degree of Pituitary Ablation and Successful Ocular Response. *Diabetes*, 23:398-407. 1974.
32. Rand, R.W.; Heuser, G. and Adams, D.A. Ten Years Experience with Stereotaxic Cryohypophysectomy. *Progress Neurological Surgery*, 6:252-271. 1975.
33. Heuser, G. and Rand, R.W. Pituitary Tumors, Pathophysiology and Treatment. In: *Perspectives in Endocrine Psychobiology*, pp. 503-523; Brambilla, F., et al, eds. *Academiai Kiado, Budapest. 1978.*
34. Levor, R.; Cohen, M.; Naliboff, B. and Heuser, G. Psychosocial Precursors and Correlates of Migraine Headache. *Journal of Consulting and Clinical Psychology*, 54:347-353. 1986.
35. Thrasher, J.D.; Wojdani, A.; Cheung, G.P. and Heuser, G. Indoor Pollution: A Public-Health and Legal Perspective. *California Trial Lawyers Association Forum, Vol. XVI; 8:296. 1986.*
36. Thrasher, J.D.; Wojdani, A.; Cheung, G. and Heuser, G. Evidence for Formaldehyde Antibodies and Altered Cellular Immunity in Subjects Exposed to Formaldehyde in Mobile Homes. A Brief Communication. *Archives of Environmental Health*, 42:347-350. Nov/Dec. 1987.
37. Heuser, G. The Neuro-Immuno-Endocrine Pathology of Toxic Chemical Exposure. *Oriental Healing Arts International Bulletin*, 13:101-104. 1988.
38. Heuser, G. Heuser, S.; Rahimian, P. and Wojdani, A. *Candida Albicans and Migraine Headaches: A Possible Link. J. Advancement Med.*, 5:177-187. 1992.
39. Heuser, G.; Wojdani, A.; Heuser, S.; Diagnostic Markers of Multiple Chemical Sensitivity. In: *Multiple Chemical Sensitivities, Addendum To Biologic Markers in Immunotoxicology*, 117-138. National Academy Press, Washington, D.C., 1992.
40. Heuser, G. Editorial: Diagnostic Markers in Clinical Immunotoxicology and

- Neurotoxicology. Internatl. J. Occup. Med. Tox., 1: V to X. 1992.
41. Heuser, G. Indoor Air Pollution. A Medical-Legal Analysis. In: Legal Neurology and Malingering. Warren F. Gorman, M.D., Editor. Warren H. Green, Inc.. St. Louis, Mo. 310-326, 1993.
  42. Heuser, G; Mena, I; Alamos, F. NeuroSPECT Findings in Patients Exposed to Neurotoxic Chemicals. Toxicology and Indust. Hlth., 10:4/5. 561-571. 1994.
  43. Heuser, G; Vojdani, A. Enhancement of Natural Killer Cell Activity and T and B Cell Function by Buffered Vitamin C in Patients exposed to Toxic Chemicals: The role of Protein Kinase - C. 1997. Immunopharmacology and Immunotoxicology, 19 (3):291-312, 1997.
  44. Barnard R. J.; Heuser, G. The Estrogen-like Effect of Herbicides: A Case Report. Clin. Pediatrics, 37:633-634, 1998.
  45. Heuser, G.; Mena, I. NeuroSPECT in Neurotoxic Chemical Exposure. Demonstration of Long Term Functional Abnormalities. Toxicology and Industrial Health, 14, #6: 813-827, 1998.
  46. Heuser, G. Multi-System Impairment after Toxic Chemical Injury: A Diagnostic Clinical Protocol. Umweltbelastungen und Gesundheit. Tagung der SPD-Bundestagsfraktion (8/26/98) Bundeshaus, Bonn, pp 70-76, 1998.
  47. Heuser, G. ÕFunktionelle Gehirn-Bildgebung mit SPECT und PET. Veršnderte GehirnaktivitEten nach neurotoxischer Exposition. Ó Zeitschrift fŸr Umweltmedizin, 7:12-15, 1999.
  48. Bartha, L.; et al. Multiple Chemical Sensitivity: A 1999 Consensus. Arch. Environ Hlth, 54:147-149, 1999.
  49. Heuser, G. Diagnostik nach toxischer Verletzung. Zeitschrift fŸr Umweltmedizin.8:284 ð 285, 2000.
  50. Heuser, G., Axelrod, P., Heuser, S.: Defining Chemical Injury: A Diagnostic Protocol and Profile of Chemically Injured Civilians, Industrial Workers and Gulf War Veterans. International Perspectives in Public Health. 20 [www.iicph.org/ipph.htm](http://www.iicph.org/ipph.htm)
  51. Heuser, G., Wu, J.C. Deep Subcortical (incl. limbic) Hypermetabolism in Patients with Chemical Intolerance. Human PET Studies. Annals of the New York Academy of Sciences, 933:319-322, 2001.
  52. Heuser, G., Heuser, S., Rodelander, D., Aguilera, O., Uszler, M. Treatment of Neurologically Impaired Adults and Children with ÕMildÓ Hyperbaric Oxygen (1.3 ATA and 24% Oxygen). In: Hyperbaric Oxygenation for Cerebral Palsy and the Brain-Injured Child. The proceedings of the 2nd International Symposium. (James T. Joiner, Ed.), Best Publishing Co., Flagstaff, AZ 109-115, 2002.
  53. Thrasher, J. D., Heuser, G., Broughton, A. Immunological Abnormalities in Humans Chronically Exposed to Chlorpyrifos. Archives of Environmental Health. 57:181-187. 2002.
  54. Heuser, G., Aguilera, O., Heuser, S., Reeves, J., Rogowski, C. Hyperbaric Oxygen Treatment in a Portable Chamber Improves Attention Span and Reaction Time in Patients with Acquired ADD. The proceedings of the XIV International Congress on Hyperbaric Medicine, (James T. Joiner, Ed.) Best Publishing Co. Flagstaff AZ 273-282 2002.
  55. Vojdani, A. Thrasher, J.D., Madison, R.A., Gray, M.R., Heuser, G., Campbell, A.W. Antibodies to to Molds and Satratoxin in Individuals Exposed in Water Damaged Buildings. Archives of Environmental Health. 58:421-432. 2003.

56. Heuser, G., Aguilera, O., Heuser, S., Gordon, R. Clinical Evaluation of Flight Attendants after Exposure to Fumes in Cabin Air. *The Journal of Occupational Health and Safety (Australia and New Zealand)* 21 (5) 455-459. October 2005.
57. Heuser, G. Clinical Neurotoxicology. In: *Umwelt, Macht und Medizin*. (A. Fabig and K.Otte Editors). Winfried Jenior Publishers, Kassel, Germany pp 166-169, 2007.
58. Heuser, G. Neuroimaging After Carbon Monoxide Exposure. In: *Carbon Monoxide Poisoning* (David G. Penney, Editor). Taylor and Francis, Publishers Chapter 20, 447- 454, 2007.
59. Ezra, N, Dang, K, Heuser, G. Improvement of Attention Span and Reaction Time with Hyperbaric Oxygen Treatment in Patients with Toxic Injury Due to Mold Exposure. *Eur J Clin Microbiol Infect Dis*. Published online October 27, 2010. 2011, Vol. 30, Number 1, pgs.1-6
60. Davis, D., de Salles, A., Heuser, G., et. al. Erroneous Comments Submitted to the FCC on Proposed Cellphone Radiation Standards and Testing by CTIA & The Wireless Association, September 3, 2013. Submitted to the FCC on November 18, 2013.
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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