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Devin Ryan

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File #: 167945

June 12, 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: Michelle Carbaugh v. PPL Electric Utilities Corporation**  
**Docket No. C-2018-3001751**

Dear Secretary Chiavetta:

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

Respectfully submitted,

A handwritten signature in blue ink, appearing to read 'Devin Ryan', is written over a horizontal line.

Devin Ryan

DTR/vab  
Enclosures

cc: Honorable Elizabeth Barnes (w/enclosures)  
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 E-MAIL & FIRST CLASS MAIL

Michelle Carbaugh  
167 N. 2<sup>nd</sup> Street  
Souderton, PA 18964  
E-mail: [michellecar2610@gmail.com](mailto:michellecar2610@gmail.com)

Date: June 12, 2019



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Devin T. Ryan

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Michelle Carbaugh,	:	
	:	
Complainant,	:	
	:	
v.	:	Docket No. C-2018-3001751
	:	
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 § 5.342(g)(1), YOU MAY FILE A REPLY TO THE ENCLOSED MOTION TO COMPEL WITHIN FIVE (5) DAYS AFTER THE DATE OF SERVICE. YOUR REPLY SHOULD BE FILED WITH THE SECRETARY OF THE PENNSYLVANIA PUBLIC UTILITY COMMISSION, P.O. BOX 3265, HARRISBURG, PA 17105-3265. A COPY OF YOUR REPLY SHOULD ALSO BE SERVED ON THE UNDERSIGNED COUNSEL.

Kimberly A. Klock (ID # 89716)  
Michael J. Shafer (ID # 205681)  
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Date: June 12, 2019

Attorneys for PPL Electric Utilities Corporation

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Michelle Carbaugh,	:	
	:	
Complainant,	:	
	:	
v.	:	Docket No. C-2018-3001751
	:	
PPL Electric Utilities Corporation,	:	
	:	
Respondent.	:	

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

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TO ADMINISTRATIVE LAW JUDGE ELIZABETH H. BARNES:

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

**I. INTRODUCTION**

1. On July 31, 2018, PPL Electric served Interrogatories and Requests for Production of Documents on the Complainant – Set I (“PPL to Complainant Set I”) via first class mail. A true and correct copy of PPL to Complainant Set I is attached hereto and marked as **Appendix A.**

2. Pursuant to the Commission's regulations, objections to PPL to Complainant Set I were due on or before August 13, 2018, and responses were due on or before August 23, 2018.<sup>1</sup>

3. The Complainant never served any objections to PPL to Complainant Set I.

4. On May 31, 2019, counsel for PPL Electric spoke with the Complainant about the outstanding discovery responses. The Complainant agreed to provide responses to the discovery as soon as she could.

5. Later on May 31, 2019, the Complainant emailed her responses to PPL to Complainant Set I. A true and correct copy of the Complainant's responses PPL to Complainant Set I is attached hereto and marked as **Appendix B**.

6. On June 5, 2019, counsel for PPL Electric emailed the Complainant and asked that she provide 12 months of phone bills or other records of actual cell phone usage for each of her household's two cell phones, as requested in PPL to Complainant Set I, Question 3.

7. The Complainant responded later on June 5, 2019, and stated that she would not provide that information.

8. To date, the Complainant has never sent a complete response to PPL to Complainant Set I, Question 3.

## **II. MOTION TO COMPEL**

9. PPL Electric requests that Administrative Law Judge Elizabeth H. Barnes ("ALJ") compel a response to PPL to Complainant Set I, Question 3.

10. Under 52 Pa. Code § 5.321(c), a party is entitled to obtain discovery of any matter not privileged that is relevant to the pending proceeding, or any matter that is reasonably calculated to lead to the discovery of admissible evidence. Discovery is permitted regardless of

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

whether the information sought “relates to the claim or defense of the party seeking discovery or to the claim or defense of another party.” *Id.*

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

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

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

14. As explained herein, the Complainant has failed to comply with the Commission’s discovery rules by failing to provide a full and complete response to PPL to Complainant Set I, Question 3 and produce the documents sought by this request.

15. For the reasons stated in more detail below, the ALJ should direct the Complainant to answer fully PPL to Complainant Set I, Question 3. Moreover, should the ALJ grant PPL Electric’s Motion to Compel and the Complainant fail to timely provide a full and complete response to Complainant Set I, Questions 3, PPL Electric intends to file a Motion for Sanctions pursuant to 52 Pa. Code §§ 5.371(a) and 5.372(a).

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

**A. PPL TO COMPLAINANT SET I, QUESTION 3**

16. PPL to Complainant-I-3 requests the following:

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.

17. The Complainant's response to PPL to Complainant-I-3 states:

2 iphones. We turn off at night and attempt to not carry in pocket/on person as much as possible

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

19. The response served by the Complainant was non-responsive and incomplete because she did not provide, and in fact has refused to provide, the "12 months of phone bills or other records of actual cell phone usage," as requested in the interrogatory.

20. However, the deadline to serve any objections was August 13, 2018.

21. The Complainant's response was served on August 23, 2018.

22. Therefore, the Complainant waived her right to object to the relevancy of this interrogatory.

23. Moreover, the information requested about cell phone use is highly relevant to the issues raised in this case.

24. The Complainant claims that she has health concerns about RF fields from AMI meters. As the testimony of PPL Electric's expert witness on RF exposures – Dr. Christopher Davis – has demonstrated, however, the RF exposure received from use of a cell phone (or even

standing within 30 feet of another person using a cell phone) is far higher than from an AMI meter.

25. PPL Electric is entitled to: (1) show how the RF exposures from the cell phone use compare to those from the AMI meter; and (2) discover the billing records needed to quantify the amount of time that the Complainant chooses to use the phones.

26. Based on the foregoing, the ALJ should direct the Complainant to answer fully PPL to Complainant Set I, Question 3.

### **III. NOTICE OF INTENT TO SEEK SANCTIONS**

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

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

29. Therefore, to the extent that this Motion is granted and the Complainant fails to answer fully PPL to Complainant Set I, or otherwise comply with the ALJ’s order, PPL Electric intends to file an appropriate Motion for Sanctions pursuant to 52 Pa. Code §§ 5.371(a) and 5.372(a).

**IV. CONCLUSION**

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

Respectfully submitted,



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Date: June 12, 2019

Attorneys for PPL Electric Utilities Corporation

# **APPENDIX A**

## **Interrogatories and Requests for Production of Documents Propounded by PPL Electric Utilities Corporation on Michelle Carbaugh – Set I**



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Devin Ryan

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717-612-6052 Direct  
717-731-1981 Direct Fax  
File #: 167945

July 31, 2018

***VIA REGULAR MAIL***

Michelle Carbaugh  
167 N. 2nd Street  
Souderton, PA 18964

**Re: Michelle Carbaugh v. PPL Electric Utilities Corporation**  
**Docket No. C-2018-3001751**

Dear Ms. Carbaugh:

Enclosed are the Interrogatories and Requests for Production of Documents Propounded by PPL Electric Utilities Corporation on Michelle Carbaugh – 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/jl  
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**

Michelle Carbaugh  
167 N. 2<sup>nd</sup> Street  
Souderton, PA 18964

Date: July 31, 2018



Devin T. Ryan

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Michelle Carbaugh,	:	
	:	
Complainant,	:	
	:	
v.	:	Docket No. C-2018-3001751
	:	
PPL Electric Utilities Corporation,	:	
	:	
Respondent.	:	

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**INTERROGATORIES AND REQUESTS FOR  
PRODUCTION OF DOCUMENTS PROPOUNDED BY  
PPL ELECTRIC UTILITIES CORPORATION ON  
MICHELLE CARBAUGH – 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 Michelle Carbaugh (“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-2018-3001751.

**INTERROGATORIES AND REQUESTS FOR  
PRODUCTION OF DOCUMENTS PROPOUNDED ON  
MICHELLE CARBAUGH – 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**

## **Michelle Carbaugh's Answers to PPL Electric Utilities Corporation's Interrogatories and Requests for Production of Documents – Set I**

Re: Formal Complaint.

(a) Please explain in detail the reasons why you are challenging the Company's installation of the new smart meter.

**I am concerned about the health effects. I have noticed the difference in sleep with my youngest when we shut off all phones, wifi and monitors at night. He will wake 5+ times a night when our wifi is not turned off.**

(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.

**My concerns are the health effects of the smart meters. The only thing I can speak about with full knowledge is what I have noticed first hand with my child's sleep, but I am concerned about other health impacts on my family that I can not see first hand.**

(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.

<http://emfsafetynetwork.org/smart-meters/>

<https://www.cancer.org/cancer/cancer-causes/radiation-exposure/smart-meters.html>

From this link:

**It would be nearly impossible to conduct a study to prove or disprove a link between living in a house with smart meters and cancer because people have so many sources of exposure to RF and the level of exposure from this source is so small.**

**Although it is said it is small, there is no way to prove or disprove a link to health impacts--I try to limit exposure as much as possible and would like that control over my own house and family. I am concerned about the long term effects being exposed a little at a time over many years--anything harmful I can eliminate contributes to the health and well-being of my family.**

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

**I just feel that in owning my house and property I should have the right to refuse something that could be harmful to my family.**

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.

**2 iphones--turned off at night**

**2 ipads**

**1 chromebook**

**1 desktop mac computer**

**1 microwave--in basement--used very rarely**

**1 wireless router--turned off at night**

**No bluetooth, and we turn it off on our phones**

**No wireless security systems**

**No smart speakers**

**1 corded baby monitor only used during daytime nap, set outside of room**

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.

**2 iphones. We turn off at night and attempt to not carry in pocket/on person as much as possible**

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.

**The only one I have noticed first hand is my child's sleep as stated above.**

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

**Started as a baby. At around 9 months old it was suggested we turn off wifi. It was a very noticeable difference in his sleep. Even now at 2 years old if our wifi accidentally stays on at night he will wake many times.**

6

17336863vl

(c) Please provide copies of all your medical records of every health condition identified in subpart (a).

**No medical records relating to this.**

(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.

**Not diagnosed by medical professional**

(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.

**n/a**

PPL to Complainant-I-5

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

**No witnesses**

(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:

**No witnesses**

(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.

**No exhibits. Only my observations.**