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File #: 167945

July 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: Kyle A. Toffey v. PPL Electric Utilities Corporation**  
**Docket No. C-2019-3006931**

Dear Secretary Chiavetta:

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

Respectfully submitted,



Devin Ryan

DTR/dmc  
Enclosure

cc: Honorable Elizabeth Barnes (*w/enclosure*)  
Kyle A. Toffey (*w/enclosure*)  
Certificate of Service

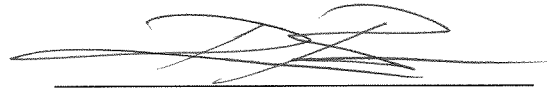
**CERTIFICATE OF SERVICE**

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 & REGULAR MAIL**

Kyle A. Toffey  
PO Box 99  
Hamlin, PA 18437  
E-mail: kyle.toffey@gmail.com

Date: July 12, 2019



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Devin T. Ryan

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Kyle A. Toffey,	:	
	:	
Complainant,	:	
	:	
v.	:	Docket No. C-2019-3006931
	:	
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.

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Date: July 12, 2019

Attorneys for PPL Electric Utilities Corporation

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Kyle A. Toffey,	:	
	:	
Complainant,	:	
	:	
v.	:	Docket No. C-2019-3006931
	:	
PPL Electric Utilities Corporation,	:	
	:	
Respondent.	:	

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**MOTION OF PPL ELECTRIC UTILITIES CORPORATION TO  
COMPEL RESPONSES TO  
DISCOVERY PROPOUNDED ON KYLE A. TOFFEY – 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 Kyle A. Toffey (“Complainant”) – Set I. In support of its Motion, PPL Electric states as follows:

**I. INTRODUCTION**

1. On May 8, 2019, PPL Electric served Interrogatories and Requests for Production of Documents on the Complainant – Set I (“PPL to Complainant Set I”) via email and certified 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 May 20, 2019, and responses were due on or before May 28, 2019.

3. The Complainant never served any objections to PPL to Complainant Set I by May 20, 2019.

4. On May 23, 2019, the Complainant served his responses to PPL to Complainant Set I. However, the Complainant refused to provide or did not provide the information and materials requested in PPL to Complainant Set I, Questions 2, 3, and 4(b)-(e). A true and correct copy of the Complainant's responses PPL to Complainant Set I is attached hereto and marked as **Appendix B**.

5. On June 11, 2019, counsel for PPL Electric spoke with the Complainant about the deficiencies with his discovery responses. The Complainant refused to provide responses to Questions 2 and 3 absent the ALJ issuing an Order compelling him to do so. However, the Complainant agreed to supplement his response to Question 4(b)-(e) by June 12, 2019.

6. The Complainant never supplemented his response to Question 4(b)-(e).

7. To date, the Complainant has never sent complete responses to PPL to Complainant Set I, Questions 2, 3, and 4(b)-(e).

## **II. MOTION TO COMPEL**

8. PPL Electric requests that Administrative Law Judge Elizabeth H. Barnes ("ALJ") compel responses to PPL to Complainant Set I, Questions 2, 3, and 4(b)-(e).

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

10. 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>1</sup>

11. 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).

12. 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.*

13. As explained herein, the Complainant has failed to comply with the Commission’s discovery rules by failing to provide full and complete responses to PPL to Complainant Set I, Questions 2, 3, and 4(b)-(e) and produce the documents sought by these requests.

14. For the reasons stated in more detail below, the ALJ should direct the Complainant to answer fully PPL to Complainant Set I, Questions 2, 3, and 4(b)-(e). Moreover, should the ALJ grant PPL Electric’s Motion to Compel and the Complainant fail to timely provide full and complete responses to Complainant Set I, Questions 2, 3, and 4(b)-(e), PPL Electric intends to file a Motion for Sanctions pursuant to 52 Pa. Code §§ 5.371(a) and 5.372(a).

**A. PPL TO COMPLAINANT SET I, QUESTION 2**

15. PPL to Complainant-I-2 requests the following:

Please identify all wireless phones, cellphones, microwaves, wireless routers, wifi networks, tablets, computers, Bluetooth speakers, wireless security systems, smart speakers (*e.g.*, Amazon

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<sup>1</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.

Echo), garage door openers, baby monitors, and walkie talkies that are contained in or used in the house.

16. The Complainant's response to PPL to Complainant-I-2 states:

I object to the relevancy of this request because my concern is with the unhealthy radio waves produced by our smart meters and the dirty electricity they generate.

Subject to my objection, I note that I have removed most of all items in my home generating radio and magnetic frequencies because of my health concerns. For example we do not have a microwave oven, television, or Bluetooth appliances. Our computers are hardwired and we don't use WiFi. We have a corded house phone and I don't have a smartphone.

17. 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).

18. The response served by the Complainant was non-responsive and incomplete because he claimed that the question is not relevant and he did not identify all of the appliances and devices requested in the interrogatory.

19. However, the deadline to serve any objections was May 20, 2019.

20. The Complainant's response was served on May 23, 2019.

21. Therefore, the Complainant waived his right to object to the relevancy of this interrogatory.

22. Moreover, the information requested about Complainant's exposure to other devices that emit radio frequency ("RF") fields is highly relevant to the issues raised in the case.

23. The Complainant claims that he has health concerns about RF fields from AMI meters. As the testimony of PPL Electric's expert witness on RF exposures – Dr. Christopher

Davis – will demonstrate, however, the RF exposure received from use of a cell phone and other devices is far higher than from an AMI meter.

24. PPL Electric is entitled to show how the RF exposures from the Complainant's devices and appliances compare to those from the AMI meter.

25. Further, as the interrogatory states, the Complainant must provide a list of what he has in his home. Instead, the Complainant provided a list of what is not in his home.

26. Indeed, although the Complainant says that he does not "have a smartphone," others in the household could, or he could have a cellphone that is not a "smartphone" according to the Complainant.

27. For these reasons, the ALJ should direct the Complainant to answer fully PPL to Complainant Set I, Question 2.

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

28. 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.

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

I object to the relevancy of this request.

30. 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).

31. The response served by the Complainant was non-responsive and incomplete because he simply stated that he "object[s] to the relevancy of this request."

32. However, the deadline to serve any objections was May 20, 2019.

33. The Complainant's response was served on May 23, 2019.

34. Therefore, the Complainant waived his right to object to the relevancy of this interrogatory.

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

36. The Complainant claims that he has health concerns about RF fields from AMI meters. As the testimony of PPL Electric's expert witness on RF exposures – Dr. Christopher Davis – will demonstrate, 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.

37. 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 phone.

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

**C. PPL TO COMPLAINANT SET I, QUESTION 4**

39. PPL to Complainant-I-4 requests the following:

- (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.

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

- (a) The following are a list of health conditions that I am concerned will be caused or worsened by the smart meters.
  - Sleep problems (insomnia, difficulty falling asleep, night walking, nightmares)
  - Stress, agitation, anxiety, irritability
  - Headaches, sharp pain or pressure in the head
  - Ringing in the ears, ear pain, high pitched ringing
  - Concentration, memory or learning problems
  - Fatigue, muscle or physical weakness
  - Disorientation, dizziness, or balance problems
  - Eye problems, including eye pain, pressure in the eyes,
  - Cardiac symptoms, heart palpitations, heart arrhythmias, chest pain
  - Leg cramps, or neuropathy
  - Arthritis, body pain, sharp, stabbing pains
  - Nausea, flu-like symptoms
  - Sinus problems, nose bleeds
  - Respiratory problems, cough, asthma
  - Skin rashes, facial flushing
  - Urinary problems
  - Endocrine disorders, thyroid problems, diabetes
  - High blood pressure
  - Changes in menstrual cycle
  - Hyperactivity or changes in children's behavior
  - Seizures
  - Recurrence of cancer
- (b) I object to the relevancy of this request on two counts
  - (a) A smart meter has not been installed so I can not provide any dates

(b) I don't want to discuss such sensitive information which, according [to] the HIPAA privacy rights, "Most of us believe that our medical and other health information is private and should be protected, and we want to know who has this information. The Privacy Rule, a Federal law, gives you rights over your health information and sets rules and limits on who can look at and receive your health information. The Privacy Rule applies to all forms of individuals' protected health information, whether electronic, written, or oral. The Security Rule is a Federal law that requires security for health information in electronic form"

- (c) I object to the relevancy of this request as previously stated in Complainant-I-4(b)
- (d) I object to the relevancy of this request as previously stated in Complainant-I-4(b)
- (e) I object to the relevancy of this request as previously stated in Complainant-I-4(b)

41. 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).

42. The responses served by the Complainant to subparts (b)-(e) were non-responsive and incomplete because he stated that he "object[s] to the relevancy of this request" and refused to provide his medical information on the grounds that it is "sensitive information."

43. However, the deadline to serve any objections was May 20, 2019.

44. The Complainant's response was served on May 23, 2019.

45. Therefore, the Complainant waived his right to object to the relevancy of this interrogatory.

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

47. Therefore, the Complainant's medical records and conditions are highly relevant to this case.

48. The Complainant should be directed to provide a full and complete response to this interrogatory.

49. Furthermore, Section 5.365(c)(4) of the Commission's regulations states:

Prior to the issuance of a protective order, a party may not refuse to provide information which the party reasonably believes to be proprietary to a party who agrees to treat the information as if it were covered by a protective order until the presiding officer or the Commission issues the order or determines that issuance of the order would not be appropriate. The party claiming the privilege shall file a petition for protective order under subsection (a) within 14 days of the date the request for information was received.

52 Pa. Code § 5.365(c)(4).

50. Here, concurrent with the filing of the instant Motion, PPL Electric is filing a Motion for Protective Order, which would protect the Complainant's medical records and information from unauthorized public disclosure.

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

52. For these reasons, the ALJ should direct the Complainant to answer fully PPL to Complainant Set I, Question 4(b)-(e).

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

53. 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).

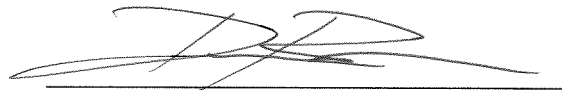
54. In ruling upon a motion for sanctions, the presiding officer may, among other things, issue: (1) “[a]n order that the matters regarding which the questions were asked, the character or description of the thing or land, the contents of the paper, or other designated fact shall be taken to be established 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).

55. 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 Kyle A. Toffey to answer fully PPL to Complainant Set I, as described above within three (3) days from the date of the order.

Respectfully submitted,



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Michael J. Shafer (ID # 205681)  
PPL Services Corporation  
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Allentown, PA 18101  
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E-mail: [kklock@pplweb.com](mailto:kklock@pplweb.com)  
[mjshafer@pplweb.com](mailto:mjshafer@pplweb.com)

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Garrett P. Lent (ID # 321566)  
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Date: July 12, 2019

Attorneys for PPL Electric Utilities Corporation

# **APPENDIX A**

## **Interrogatories and Requests for Production of Documents Propounded by PPL Electric Utilities Corporation on Kyle A. Toffey – Set I**



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Devin Ryan

dryan@postschell.com  
717-612-6052 Direct  
717-731-1981 Direct Fax  
File #: 187945

May 8, 2019

**VIA CERTIFIED MAIL (7017 1450 0002 3778 1106)**  
**VIA E-MAIL**

Kyle A. Toffey  
PO Box 99  
Hamlin, PA 18437


**Re: Kyle A. Toffey v. PPL Electric Utilities Corporation**  
**Docket No. C-2019-3006931**

Dear Mr. Toffey:

Enclosed are the Interrogatories and Requests for Production of Documents Propounded by PPL Electric Utilities Corporation on Kyle A. Toffey – 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 E-MAIL & CERTIFIED MAIL**

Kyle A. Toffey  
PO Box 99  
Hamlin, PA 18437  
E-mail: [kyle.toffey@gmail.com](mailto:kyle.toffey@gmail.com)

Date: May 8, 2019



Devin T. Ryan

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Kyle A. Toffey,	:	
	:	
Complainant	:	
	:	
v.	:	Docket No. C-2019-3006931
	:	
PPL Electric Utilities Corporation,	:	
	:	
Respondent	:	

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**INTERROGATORIES AND REQUESTS FOR  
PRODUCTION OF DOCUMENTS PROPOUNDED BY  
PPL ELECTRIC UTILITIES CORPORATION ON  
KYLE A. TOFFEY – 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 Kyle A. Toffey (“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-2019-3006931.

**INTERROGATORIES AND REQUESTS FOR  
PRODUCTION OF DOCUMENTS PROPOUNDED ON  
KYLE A TOFFEY – 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**

## **Kyle A. Toffey's Answers to PPL Electric Utilities Corporation's Interrogatories and Requests for Production of Documents – Set I**

Complainant Responses to  
Interrogatories and Request of Production of Documents  
Propounded on Kyle A Toffey by PPL  
Docet No. C-2019-3006931

Complainant-I-1

- (a) My objection to the installation of a smart meter is for the following concerns: health, safety, privacy reasons.
- (b) Health Reasons  
There are a myriad of health issues that have been documented in relationship to the microwave / radio frequencies generated by smart meters. I don't want to expose my family or myself to these risks.
- (c) Safety Reasons  
It has come to my attention that the utility meter you and your employees or agents plan to install on our property contain flammable and delicate electronics for power diversion, data collection and processing, and/or the capacity for transmission of radio signals. Those flammable and delicate electronics are directly in circuit with your electrical power grid which is subject to multi-thousand volt surges without warning which represents inexcusable negligence on your part and extreme hazard to our property and safety due to the fact that the electronic instruments included in your meters cannot survive any substantial grid line surge (2000 volts or greater) without total failure and often without fire and/or explosion.  
Mainstream media has reported thousands of fires caused by electronic utility meters, yet fires in legacy electromechanical utility meters are virtually unheard of.  
Examination of electronic utility meters clearly shows them to be lacking the requisite surge protection to protect the flammable and delicate electronics therein. In fact, it is doubtful that surge protection is possible inside a device as small as a utility meter when electronic micro circuits are present.  
Meter should be UL approved to put on my building.  
Also referred to as "transients" or "Electric Fields", these are harmful electric fields in your living spaces caused by the power supply for the surveillance device in your utility meter. Some experts believe this has caused a cancer epidemic and is very hazardous to health in many ways.  
Disrupted current on house wiring will not only cause health problems for occupants of your property, it damages your appliances and electronics, and it causes your utility bill to go up with the wasted energy.
- (d) Privacy Reasons  
With the new electronic utility meters, the electric company will collect a highly revealing profile of your personal and private activities and living habits inside your home with time-of-day metrics in a database which they will store for years and share with law enforcement, government agencies, insurance companies, possible spouse's divorce lawyer, criminal hackers, etc, etc. This is a violation of my 4<sup>th</sup> Amendment rights.
- (e) Violations of the Law
- (a) Knowingly exposing me and my family to harmful radiation is a violation of the law. There is no warning label describing the dangers of the smart meters.
- (b) Unwarranted surveillance is illegal
- (c) PPL is attempting to inflict their unsafe meters upon my home, against my consent; against basic fundamental property rights; and in excess of PPL's regulatory authority granted by both federal and Pennsylvania law. Both those government authorities make the smart

meter program voluntary only. Cf. Pub. L. 109-58 the Energy Policy Act of 2005 §1252. Smart Metering; Pennsylvania HB2200 §2807(f)7(2) and PA P.L. 1592, No. 129.

#### Complainant-I-2

I object to the relevancy of this request because my concern is with the unhealthy radio waves produced by your smart meters and the dirty electricity they generate.

Subject to my objection, I note that I have removed most of all items in my home generating radio and magnetic frequencies because of my health concerns. For example we do not have a microwave oven, television, or Bluetooth appliances. Our computers are hardwired and we don't use WiFi. We have a corded house phone and I don't have a smartphone.

#### Complainant-I-3

I object to the relevancy of this request.

#### Complainant-I-4

(a) The following are a list of health conditions that I am concerned will be caused or worsened by the smart meters.

- Sleep problems (insomnia, difficulty falling asleep, night waking, nightmares)
- Stress, agitation, anxiety, irritability
- Headaches, sharp pain or pressure in the head
- Ringing in the ears, ear pain, high pitched ringing
- Concentration, memory or learning problems
- Fatigue, muscle or physical weakness
- Disorientation, dizziness, or balance problems
- Eye problems, including eye pain, pressure in the eyes,
- Cardiac symptoms, heart palpitations, heart arrhythmias, chest pain
- Leg cramps, or neuropathy
- Arthritis, body pain, sharp, stabbing pains
- Nausea, flu-like symptoms
- Sinus problems, nose bleeds
- Respiratory problems, cough, asthma
- Skin rashes, facial flushing
- Urinary problems
- Endocrine disorders, thyroid problems, diabetes
- High blood pressure
- Changes in menstrual cycle
- Hyperactivity or changes in children's behavior
- Seizures
- Recurrence of cancer

(b) I object to the relevancy of this request on two counts.

(a) A smart meter has not been installed so I can not provide any dates

(b) I don't want to discuss such sensitive information which, according to the HIPAA privacy rights, "Most of us believe that our medical and other health information is private and should be protected, and we want to know who has this information. The Privacy Rule, a Federal law, gives you rights over your health information and sets rules and limits on who can look at and receive your health information. The Privacy Rule applies to all forms of individuals' protected health information, whether electronic, written, or oral. The Security Rule is a Federal law that requires security for health information in electronic form"

- (c) I object to the relevancy of this request, as previously stated in Complainant-I-4 (b)
- (d) I object to the relevancy of this request, as previously stated in Complainant-I-4 (b)
- (e) I object to the relevancy of this request, as previously stated in Complainant-I-4 (b)

#### Complainant-I-5

No fact witnesses are being called. I am simply a property owner trying to opt-out of using equipment I have determined to be detrimental to my family's health based on research I have done.

#### Complainant-I-6

No expert witnesses are being called. I am simply a property owner trying to opt-out of using equipment I have determined to be detrimental to my family's health based on research I have done.

#### Complainant-I-7

The following exhibits are included:

- Ref: Complainant-I-7-a
- Ref: Complainant-I-7-b

Ref: Complainant-I-7-a

Exhibit:

“Independent Science on the Effect of Wireless Radiation on Human Health (updated Nov. 2018)”

Source:

Grassroots Environmental Education • 52 Main Street • Port Washington • New York • (516) 883-0887

Relevancy:

This is a list of over 150 reports and study results explaining the dangers of the kinds of wireless radiation produced by SmarMeter such as PPL uses. These studies are from governmental and private agencies. These provide irrefutable information about the harm of caused my your devices.

## INDEX

Independent Science on the Effect of Wireless Radiation on Human Health  
Updated November 2018

- I. Effect on Fetal and Newborn Development
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- V. Other Malignancies
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- VII. Neurological/Cognitive Effects
- VIII. Effects on Male Fertility
- IX. Electromagnetic Sensitivity
- X. Effects on Implanted Medical Devices
- XI. 5G Effects
- XII. Miscellaneous Articles

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Exhibit:

“Smart Meters: A Health Risk?” 3/29/2019

Source:

Vision Times

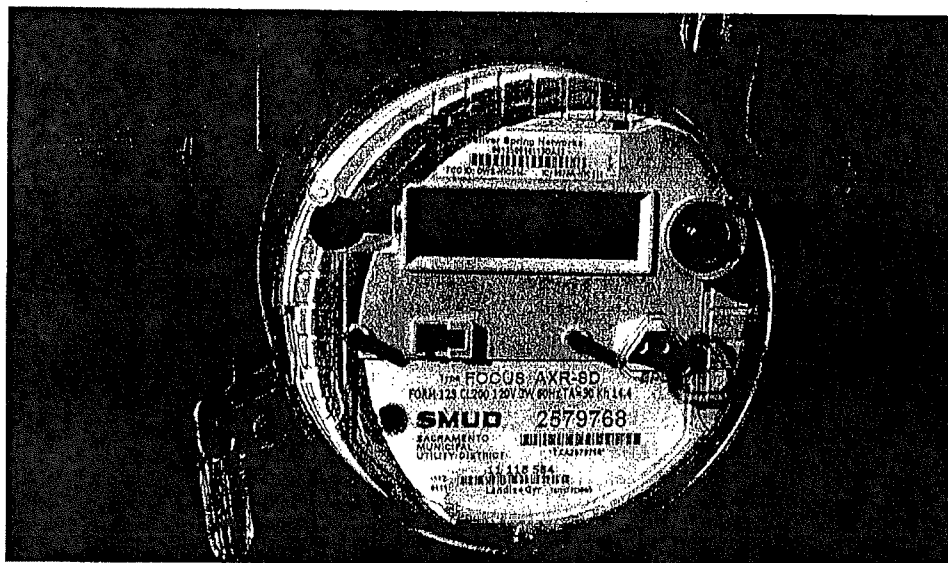
<http://www.visiontimes.com/2019/03/29/smart-meters-a-health-risk.html>

Relevancy:

Discussion of safety and privacy of smart meters.

# Smart Meters: A Health Risk? - Vision Times

## Smart Meters: A Health Risk?



More than 40 percent of American households have already had smart meters installed in their homes. (Image: Screenshot / YouTube)

More than 40 percent of American households have already had smart meters installed in their homes. These devices collect data on electricity consumption in a household and send it back to the central computer system of the utility provider. The meter uses RF transmissions to talk with the central system. Some people worry that the waves being emitted by the devices could be a serious health risk, even resulting in cancer.

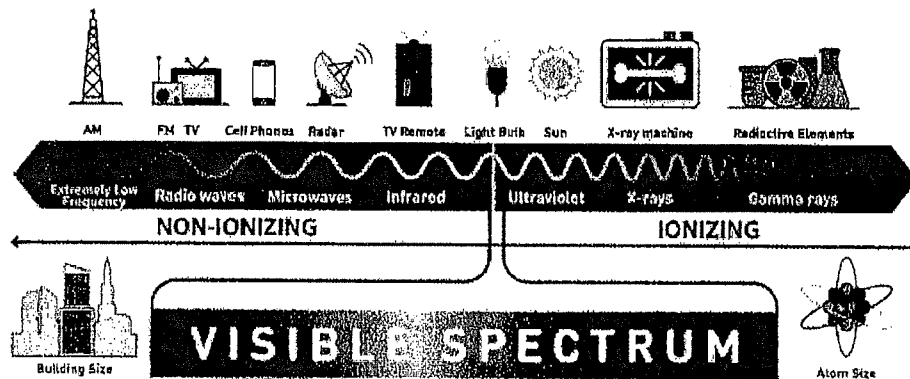
## Health risks

In 2015, almost 220 scientists from 41 countries signed the International Scientists Appeal, warning that the frequencies emitted by cell phones, smart meters, and Wi-Fi are harmful to health. The Bioinitiative report has collected around 2,000 scientific papers that talk about the negative effects of electromagnetic fields. These were reviewed by 29 scientists. "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,” according to EMF Safety Network.

Utility companies argue that smart meter emissions are far lower than those from a satellite dish or cell phone, and state that they follow FCC’s health guidelines regarding RF radiation. However, critics point out that the FCC’s guidelines were set up in 1996 before the modern technological surge and that it is ineffective when gauging the dangers posed by current devices. The National Toxicology Program in Research Triangle Park has stated that RF radiation is carcinogenic. Even the World Health Organization (WHO) admits to it.

## Electromagnetic Spectrum



Utility companies argue that smart meter emissions are far lower than those from a satellite dish or cell phone. (Image: Screenshot / YouTube)

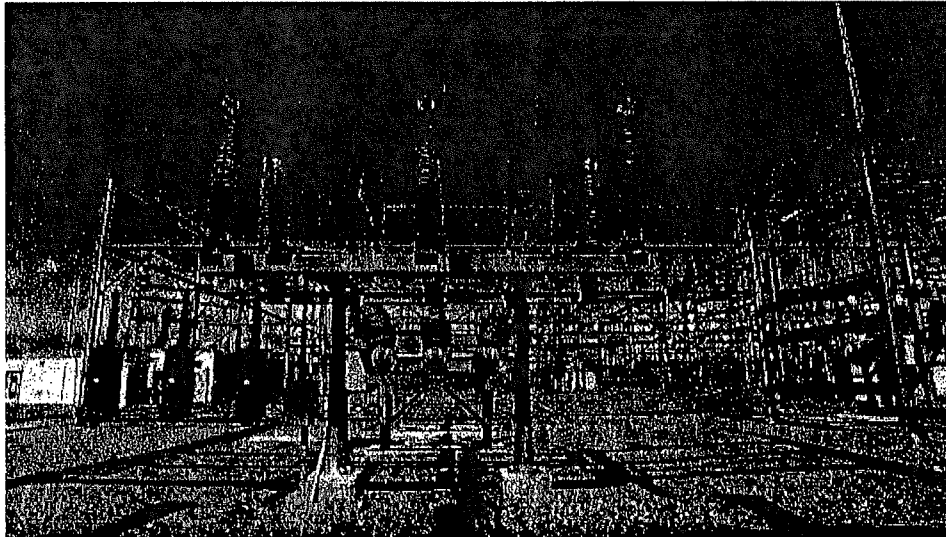
Though smart meters emit low-level RF radiation, many people claim to have experienced headaches, migraines, sleep disturbances, balance problems, and dizziness after being exposed to them. But despite these health concerns, utility companies continue installing smart meters in American households. Some claim that since the meters are located outside the walls, any potential negative health impact from the meters will be “minimized.”

“The outside wall of the house should provide some shielding, and, even if you had a bedroom, or a place where people spent a lot of time on the other side of

the wall, we're still talking about a good amount of distance behind the wall and away from the smart meter," Burton Ogle, a professor at the Environmental Health Program at Western Carolina University, said to WLOS.

## Privacy and security concerns

The smart meters also come with their fair share of privacy and security issues. Being connected to a central computer system over the Internet, these meters are a target for hackers from hostile nations. A successful hack attempt could end up damaging the electric grid of the entire country, creating chaos.



Being connected to a central computer system over the Internet, these meters are a target for hackers who could end up damaging the electric grid of the entire country. (Image: Screenshot / YouTube)

"There is not a power meter or device on the grid that is protected from hacking — if not already infected with some kind of Trojan horse that can cause the grid to be shut down or completely annihilated," David Chalk, a cyber-security expert, said in a video.

When it comes to privacy, smart meters can provide information about a home's energy consumption pattern to utility companies and the government. However, this breach of privacy has been countered somewhat by a U.S. court judgment last year that declared that energy consumption data of a household is

protected under the Fourth Amendment.

By 2020, almost 80 percent of American households are expected to have smart meters installed. In the EU, approximately 200 million households will have these devices by the end of this decade.

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