

CONCHITA M BRAUN

1220 Parkside Drive South
Reading, PA 19611

610 /375-3501

July 24, 2019

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PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street 2nd Floor
Harrisburg, PA 17120

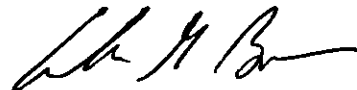
RE: Conchita M Braun vs. Metropolitan Edison Company
Docket No. C-2018-3003001

Dear Secretary Chiavetta,

Please find enclosed Complainant's Request for Clarification and Extension of Time to Submit Written Testimony.

This document is also being filed with the Honorable Jeffrey Watson and copied to Respondent, along with the corresponding Certificate of Service.

Sincerely,



Conchita M Braun

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**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

CONCHITA M BRAUN :
v. : **Docket No. C-2018-3003001**
METROPOLITAN EDISON COMPANY :

**REQUEST FOR CLARIFICATION and EXTENSION OF TIME
TO SUBMIT WRITTEN TESTIMONY**

A prehearing conference was held in this case on May 16th, 2019. As of this date, July 24th, Complainant has not received an order from the presiding officer revising the dates that were agreed upon during such conference.

Since the conference took place, Complainant has submitted three filings. A factual witness report was sent on May 30th and a Status Report on June 21st, based on her notes and her recollection of the dates agreed upon. Complainant also filed a Motion to Compel on July 8th, to which she's awaiting a ruling. On July 20th I received a letter from the Company, dated June 16th, in response to the Motion to Compel, where the Company disagrees with Complainant when she stated that the Company failed to provide full and complete answers to Interrogatory Set I- No.22. In the response the Company admits that they erroneously reiterated the wrong question 12 from Interrogatory Set II. The Company goes on to say that they would provide a detailed response to question 12 from Interrogatory set II, no later than close of business Friday July 19th, 2019. As of this date, July 24th, Complainant has not received any response to that question.

During the pre-hearing conference there was some discussion about dates to provide written testimony. From Complainant's recollection, the date to submit her testimony was July 31st. Before Complainant can start working on her written testimony, she needs the ruling on her outstanding Motion to Compel to resolve the outstanding discovery issues. Complainant also needs clarification from Respondent, as on Respondents' Status Report dated June 14th, they claim that now Respondent will only be using one expert witness in this case, instead of three, but failed to name who that witness will be. Also, Complainant is confused as no order has been issued by the presiding officer stating any of the dates that were discussed at the prehearing conference, as it's been done in other cases. I'm still not clear on how to properly redact and file a written testimony. Complainant has not been able to find written testimonies from other pro se complainants, to use as samples to see how they were done. Complainant doesn't know either how the written testimony is to be filed, if it's mailed just to the Company with only a cover letter and a certificate of service to the ALJ and Secretary? I was expecting a document with some clarification, to arrive after the May 16th conference.

Since the prehearing conference took place, Complainant has had no time to work on a written testimony as she has dedicated the only spare time she's had available, to send the three filings mentioned above, which also required the time to carefully review the responses to the interrogatories and then issue the subsequent Motion to compel, plus now this fourth filing. Coming out with that time has been a struggle. This time of the year, is my busiest time at work, that combined with other responsibilities that cannot be ignored, as is the upkeep of my large property which is also very time consuming in the summer months, my obligations with family, having family visiting from California, Oregon, North Carolina, Delaware and DC, and in assisting my elderly mother on a regular basis with her needs, leaves me with no available time at this point to work on a written testimony.

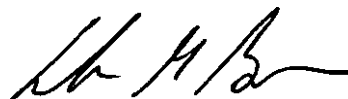
A written testimony should not be done in a rush and under pressure. It will require concentration and much more than a spare couple of hours here and there, which is all I might have available in the following months. Please keep in mind that as I indicated during the pre-hearing conference, I will be unavailable and out of the country most of September and beginning of October, so in all honesty, looking at the time frame it will be impossible to submit a written testimony any earlier than the end of October.

It is obvious that Complainant is addressing her case and submitting filings in a timely fashion to the best of her ability and cannot be accused otherwise, as proven by the volume of filings to date.

Given Complainant's time restrictions, the pending unresolved issues with discovery, the lack of knowledge concerning Respondent's witness, the pending ruling on the outstanding Motion to Compel, not receiving an order after the pre-hearing took place and the fact that no date has been established yet for an evidentiary hearing, Complainant respectfully requests clarification on the pending issues and that an extension of time to submit Complainant's written testimony be granted and that the date be no earlier than October 31st.

I thank you in advanced for your understanding and allowing me the opportunity to have the needed time to properly prepare such important document.

Sincerely,



Conchita M Braun

Dated July 24th, 2019.

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BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

CONCHITA M BRAUN :
v. : **Docket No. C-2018-3003001**
METROPOLITAN EDISON COMPANY :

CERTIFICATE OF SERVICE

I, Conchita M Braun, hereby certify that I have this day, July 24, 2019, served a true copy of the aforementioned document upon the individuals listed below, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant)

Service by Certified Mail to:

and First-Class Mail to:

Lauren Lepkoski
Tori L Giesler
First Energy Service Company/Met Ed
2800 Pottsville Pike
P.O. BOX 16001
Reading, PA 19612-6001

ALJ Jeffrey A Watson
Pennsylvania Public Utility Commission
301 5th Avenue, Suite 220- Platt Place
Pittsburgh, PA 15222

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor.
Harrisburg, PA 17120



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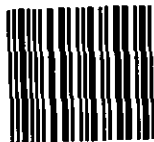
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Commonwealth Keystone Building
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Harrisburg PA 17120*

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