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August 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: Thomas Maslar v. PPL Electric Utilities Corporation
Docket No. C-2018-3003075

Dear Secretary Chiavetta:

Enclosed please find the Replies of PPL Electric Utilities Corporation to the Exceptions of Thomas Maslar for filing in the above-referenced proceeding. Copies will be provided as indicated on the Certificate of Service.

Respectfully submitted,



Devin Ryan

DTR/dmc
Enclosures

cc: Honorable Elizabeth Barnes
Office of Special Assistants (*via E-mail*)
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

Thomas Maslar
3556 Apollo Court
Orefield, PA 18069

Date: August 12, 2019



Devin T. Ryan

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Thomas Maslar,	:	
	:	
Complainant,	:	
	:	
v.	:	Docket No. C-2018-3003075
	:	
PPL Electric Utilities Corporation,	:	
	:	
Respondent.	:	

**REPLIES OF PPL ELECTRIC UTILITIES CORPORATION TO THE
EXCEPTIONS OF THOMAS MASLAR**

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I. INTRODUCTION

PPL Electric Utilities Corporation (“PPL Electric” or the “Company”), pursuant to 52 Pa. Code § 5.535, hereby respectfully submits these Replies to the Exceptions of Thomas Maslar (“Complainant”). In the Initial Decision (“ID”), Administrative Law Judge Elizabeth H. Barnes (the “ALJ”) dismissed the Complainant’s Formal Complaint challenging the Company’s planned installation of a new advanced metering infrastructure (“AMI”) meter at his premises. The ALJ correctly held that the Complainant failed to prove by a preponderance of evidence that the installation of the AMI meter constitutes unsafe or unreasonable service under 66 Pa. C.S. § 1501.

On July 31, 2019, the Complainant filed Exceptions to the ID.¹

As explained herein, the Complainant’s Exceptions are without merit and should be denied. Accordingly, the Company respectfully requests that the Pennsylvania Public Utility Commission (“Commission”) deny the Complainant’s Exceptions and adopt the ID without modification.²

II. REPLIES TO EXCEPTIONS

A. **REPLIES TO EXCEPTIONS NOS. 1-9 – THE ALJ PROPERLY FOUND THAT THE COMPLAINANT FAILED TO SUSTAIN HIS BURDEN OF PROOF THAT INSTALLING THE NEW AMI METER WOULD VIOLATE SECTION 1501 OF THE PUBLIC UTILITY CODE**

The Complainant disputes the ALJ’s finding that he failed to meet his burden of proof that installing the new AMI meter would violate Section 1501 of the Public Utility Code. (Exceptions at 1-2.) According to the Complainant, the ALJ erred in sustaining PPL Electric’s objections to the Complainant’s exhibits and not admitting them into the record. (Exceptions, p.

¹ Per the Secretarial Letter serving the ID, Exceptions were due within 20 days (*i.e.*, by August 1, 2019), and Replies thereto were due within 10 days after that (*i.e.*, by August 12, 2019). Therefore, these Replies are timely filed in response to the Complainant’s July 31, 2019 Exceptions.

² There is substantial overlap in the Complainant’s Exceptions. Accordingly, PPL Electric responds to the Complainant’s Exceptions by subject matter rather than individually by the number of the Exception.

1.) Although the Complainant acknowledges that he did not provide copies of the exhibits in advance of the hearing, he alleges that he did not need to provide the exhibits to PPL Electric and the ALJ before the hearing and that he could produce them, for the first time, at the May 28, 2019 evidentiary hearing. (Exceptions, p. 1.) Furthermore, the Complainant contends that Dr. Christopher Davis, one of PPL Electric's witnesses, is biased and provided inaccurate testimony, so the ALJ should have disregarded Dr. Davis's testimony and exhibits. (Exceptions at 1-2.) As explained herein, the Complainant's Exceptions are without merit and should be denied.

1. There Is No Reliable Medical or Scientific Basis to Conclude that the New AMI Meter Will Cause, Contribute to, or Exacerbate Any Adverse Health Effects

The ALJ properly held that there is no reliable medical or scientific basis to conclude that the new AMI meter will cause, contribute to, or exacerbate any adverse health effects. (ID at 18-23.) As a preliminary matter, the ALJ correctly determined that the Complainant failed to establish a *prima facie* case to show that any radio frequency ("RF") exposure from the AMI meter will cause him to experience adverse health effects. (ID at 22.) As the ALJ observed, "No corroborative medical evidence was proffered to support Complainant's testimony," and "[t]here is insufficient evidence to show that an AMI meter will cause him to suffer deleterious health effects." (ID at 22.)

In addition, PPL Electric presented thorough, credible, and reliable expert testimony refuting the Complainant's bald assertions and establishing that there is no reliable medical or scientific basis to conclude that the new AMI meter will cause, contribute to, or exacerbate any adverse health effects. (ID at 10, 18-23; PPL St. No. 1, pp. 5-16; PPL Exhibits CD-1 through CD-5; PPL St. No. 2, pp. 7-18; PPL Exhibits MI-1 through MI-3.)

First, Dr. Davis testified that the Federal Communications Commission ("FCC") has determined safe public exposure levels for RF fields from devices that transmit RF signals, such

as the AMI meters. (PPL St. No. 1, p. 9.) The FCC safe public exposure limits are based on evaluations of the body of scientific research on RF fields and were adopted in consultation with other federal agencies, including the Food and Drug Administration (“FDA”) and the Environmental Protection Agency (“EPA”). (PPL St. No. 1, p. 9.) The FCC continues to coordinate with the agencies and to consider whether new scientific research shows any adverse effects from RF fields. (PPL St. No. 1, pp. 9-10.)

Based on the engineering specifications for the Landis + Gyr AMI meter being deployed by the Company, Dr. Davis calculated that the levels of RF fields from the AMI meters are **98,000 times lower** than the RF exposure safety limits established by the FCC. (PPL St. No. 1, p. 13; PPL Exhibit CD-2.) As a result, Dr. Davis found that “the RF field levels from the AMI meters being used by PPL Electric more than comply with the applicable FCC RF exposure limit.” (PPL St. No. 1, p. 13.) Moreover, the RF signals from the AMI meter are of very short duration and will occur for only a total of 84 seconds over a 24-hour period. (PPL St. No. 1, p. 7.)

Dr. Davis also testified that there are many sources of RF signals in the everyday environment and the RF fields from the AMI meter are much lower than from other typical sources. (PPL St. No. 1, p. 14.) For example, RF fields from using cell phones can be over 260,000 times higher than the RF fields from the AMI meter, and RF exposures from microwave ovens can be over 820,000 times higher. (PPL St. No. 1, p. 14.) Even 30 feet away from a person using a cell phone, the RF fields are 3 times higher than from the AMI meter. (PPL St. No. 1, p. 14.)

Furthermore, the existing background levels of RF fields at the Complainant’s residence are many times higher than the fields from the AMI meter. (PPL St. No. 1, p. 15.) Dr. Davis

testified that there are 6 television broadcast towers within a 50-mile radius of the Complainant's location. (PPL St. No. 1, p. 15.) Based on the locations of each tower and their RF power outputs, the constant background levels of RF fields at the Complainant's residence are **23.3 times higher** than the RF signals from the AMI meter. (PPL St. No. 1, p. 15; PPL Exhibit CD-5.) Thus, considering the AMI meter's RF fields are substantially lower than the FCC standard and many everyday sources, there is no reliable scientific basis to conclude very low levels of RF fields from the AMI meters being deployed by the Company can or will cause any adverse thermal or non-thermal biological effects in people. (PPL St. No. 1, pp. 15-16.) Notably, Dr. Davis's expert testimony on these points was not contradicted by any other expert testimony.

Second, Dr. Israel – the only medical expert to present testimony in this case – evaluated the scientific research on RF fields and adverse health effects. (PPL St. No. 2, p. 8.) He testified that he has been systematically examining this research over the past several decades and that many hundreds of studies have been published. (PPL St. No. 2, p. 6.) Dr. Israel stated that the three groups of controlled laboratory studies on animals “are particularly informative because they address fundamental biological functions that are very sensitive to any disruption: genetics, reproduction, and growth and development.” (PPL St. No. 2, p. 8.) Dr. Israel described a number of the studies in these areas which he considered good examples of well-designed and well-conducted studies, which found no adverse effects on genetics, fertility, reproduction, growth, or development in the animals exposed to RF fields. (PPL St. No. 2, pp. 8-9.) Further, Dr. Israel provided examples of well-conducted animal studies on RF fields and cancer. (PPL St. No. 2, pp. 9-10.) These studies also did not find any increased incidence in cancer in the RF exposed animals compared to non-exposed animals. (PPL St. No. 2, pp. 9-10.)

Based on the body of scientific research showing no consistent and reproducible effects from RF fields on cancer and other adverse health effects, the World Health Organization (“WHO”) has concluded that “no adverse health effects have been established as being caused by mobile phone use.” (PPL St. No. 2, p. 10.) Many other public health authorities, including agencies in Canada, the U.K., Sweden, Norway, the Netherlands, and New Zealand, among others, have recently reached similar conclusions. (PPL St. No. 2, pp. 10-11.) Further, several U.S. state public health authorities and public utility commissions have investigated claims about health effects from smart meters, all of which have found that RF fields from smart meters do not pose any public health risk. (PPL St. No. 2, p. 11.)

In addition, Dr. Israel reviewed the published scientific research on electromagnetic hypersensitivity (“EHS”) from the perspective of a medical doctor. (PPL St. No. 2, pp. 12-15.) He was the only medical doctor to provide expert testimony in this case. Dr. Israel testified that claimed symptoms related to EHS are more accurately described as “Idiopathic Environmental Intolerance” (“IEI”), in which “idiopathic” means “cause unknown,” rather than electromagnetic hypersensitivity. (PPL St. No. 2, pp. 12-13.) This is consistent with a recommendation from the WHO. (PPL St. No. 2, pp. 12-13.) Dr. Israel evaluated the scientific research on IEI and found that “[r]eliable studies dating back to at least 2002 and also recent reviews of the studies by experts and reviews by expert panels of public health authorities have found IEI and the variety of symptoms attributed to it are not caused by exposure to RF fields.” (PPL St. No. 2, p. 13.) For example, a systematic review of 46 studies involving 1,175 individuals who claimed IEI symptoms found that people claiming IEI symptoms from RF fields could not replicate the claimed effect under controlled laboratory conditions. (PPL St. No. 2, pp. 13-14.) Another recent study found that people who claimed IEI symptoms from RF fields reported lower levels

of well-being when they knew they were exposed to RF fields, but when they did not know if they were being exposed, their reports of symptoms were not associated with RF fields. (PPL St. No. 2, p. 14.) That study concluded that “it is IEI-EMF individuals’ belief that exposure to RF EMFs will cause harm, rather than actual exposure itself, that results in the presence of symptoms in IEI-EMF individuals.” (PPL St. No. 2, p. 14.) Moreover, the research on IEI has been evaluated by credible public health entities and expert groups, including the United Kingdom Health Protection Agency (2012), the Royal Society of Canada (2013), the New Zealand Ministry of Health (2015), and the European Commission’s Scientific Committee on Emerging and Newly Identified Health Risks (2015). (PPL St. No. 2, pp. 14-15.) Based on their reviews of the scientific research, these entities concluded there is no reliable scientific evidence that exposure to RF fields causes claimed IEI symptoms. (PPL St. No. 2, pp. 15-16.)³

As a result, the Company presented overwhelming evidence through its scientific and medical expert witnesses, Dr. Christopher Davis and Dr. Mark Israel, to support the ALJ’s finding that there is no reliable basis to conclude that the new AMI meter will cause or contribute to any adverse health effects. (ID at 10, 18-23.)

2. The ALJ Properly Sustained PPL Electric’s Objections to the Complainant’s Exhibits and Did Not Admit Them into the Record

The ALJ also correctly sustained the Company’s objections to the Complainant’s hearsay exhibits, which he never provided in advance of the evidentiary hearing as required by the ALJ’s Second Prehearing Order and the Commission’s regulations. (ID at 18.) As PPL Electric explained at the hearing, the ALJ’s Second Prehearing Order explicitly set a deadline of March

³ In addition, the Complainant alleged in his Formal Complaint that the new AMI meter would cause him to experience tinnitus (ringing in the ears) and difficulty sleeping. (ID at 2.) Although he did not raise these allegations at the evidentiary hearing, Dr. Israel responded to these claims in his written testimony. (PPL St. No. 2, pp. 15-17.) Based on his medical evaluation, Dr. Israel testified that there is no reliable scientific basis to conclude that exposure to RF fields from the AMI meters being used by PPL Electric cause or contribute to tinnitus or adverse effects on sleep quality. (PPL St. No. 2, pp. 16-17.)

15, 2019, for the Complainant to serve PPL Electric and the ALJ with copies of the statements, reports, testimony, and exhibits that he intends to present at the hearing. *See* Second Prehearing Order, Docket No. C-2018-3003075, ¶ 9 (Feb. 6, 2019); (Tr. 24). The Complainant never served exhibits on PPL Electric by that deadline or even before the May 28, 2019 hearing. (Tr. 24.) Therefore, as the ALJ held, the Complainant failed to comply with the Second Prehearing Order. (ID at 18.) In contrast, PPL Electric complied with the Second Prehearing Order and served all of its written testimony and exhibits by its April 19, 2019 deadline. (Tr. 24); *see* Second Prehearing Order ¶ 10.

Moreover, the Company propounded discovery requests on the Complainant months before the evidentiary hearing, which asked the Complainant to provide, among other things, copies of any exhibits he planned to introduce at the hearing. (Tr. 23-24.) The Complainant responded in April 2019, well after the March 15, 2019 deadline for him to serve his exhibits on the ALJ and PPL Electric, that he did not have any exhibits at that time. (Tr. 24.) Even though the Complainant later prepared exhibits, he never supplemented that discovery response despite his obligation to do so under the Commission's regulations. (Tr. 24); *see* 52 Pa. Code § 5.332(2) (stating that “[a] party or an expert witness is under a continuing duty to amend a prior response upon discovering that the response is incorrect or incomplete”).

Yet, for the first time at the evidentiary hearing, the Complainant appeared with several hearsay exhibits, which he claimed were “scientific studies and one bibliography of scientific studies on potential dangers, 60 pages of links to studies, thousands of studies” (Tr. 22-23.) The Complainant's actions violated both the Commission's regulations and the ALJ's Second Prehearing Order.

Further, by waiting until the evidentiary hearing to produce these exhibits, the Complainant denied the Company and its witnesses a reasonable opportunity to review the documents and investigate the claims made therein. Indeed, as the ALJ observed, the “Complainant knew in advance of the hearing that PPL’s expert witnesses would appear via telephone.” (ID at 18.) Although Attorney Ryan for Electric was present in the hearing room, “Dr. Israel and Dr. Davis as well as Attorney Renner appeared at the hearing via telephone, with no means of reviewing the hard copies of exhibits brought to the in-person hearing by Complainant.” (ID at 18-19.) Conversely, the Complainant had all of PPL Electric’s testimony and exhibits for over a month before the hearing. (Tr. 24.) Therefore, the ALJ correctly held that “[i]t would have prejudiced [PPL Electric] to require its expert witnesses to review and respond to the hundreds of studies Complainant claimed he relied upon in his testimony at the hearing.” (ID at 19.) Thus, the ALJ properly sustained the Company’s objections to the Complainant’s last-minute exhibits.

3. The ALJ Correctly Relied on Dr. Davis’s Expert Testimony about the AMI Meter’s RF Fields and Transmissions and Rejected the Complainant’s Unsupported Lay Testimony

The Complainant contends that Dr. Christopher Davis, one of PPL Electric’s expert witnesses, offered a biased opinion and lacks credibility. (Exceptions, pp. 1-2.) He also alleges that ALJ erred in relying on Dr. Davis’s testimony that the Complainant’s self-measurements of the RF fields from the AMI meter using the Cornet EDT88 meter are unreliable and should be rejected. (Exceptions, p. 2.) As alleged support, the Complainant claims that Dr. Davis inaccurately stated: (1) the number of times that the AMI meter transmits data in a 24-hour period; (2) the RF field output of the AMI meter at issue; and (3) the range of RF fields that the Cornet EDT88 meter can measure. (Exceptions, pp. 2-3.) None of the Complainant’s arguments has merit.

First, the ALJ properly relied on the credible, thorough, and substantial expert testimony offered by Dr. Davis. (ID at 19-21.) As outlined in his written testimony, Dr. Davis is an active and highly regarded scientific researcher with over 30 years of experience teaching Physics, Electrical Engineering, Electromagnetics, and Radio Frequency Electromagnetics. (PPL St. No. 1, pp. 1-2.) He has conducted many scientific studies in these fields and has published 255 studies in peer-reviewed scientific journals. (PPL St. No. 1, p. 2.) In particular, he has conducted a substantial amount of research on RF fields of the type produced by the AMI meters being used by the Company. (PPL St. No. 1, p. 3.) Furthermore, Dr. Davis has served on expert committees that have evaluated the scientific research on RF fields, including the Institute of Electrical and Electronic Engineers (“IEEE”) Committee on Man and Radiation (“COMAR”) and as chair of the Subcommittee on Radio Frequency Fields, which consists of experts who examine the scientific research on RF fields and evaluate the IEEE exposure guidelines. (PPL St. No. 1, p. 3.) Dr. Davis has received a number of honors and awards for his teaching and research and has provided expert advice on electromagnetic fields, including RF fields dosimetry and proposed mechanisms for biological effects other than heating, to the United Kingdom Health Protection Agency, the U.S. National Institutes of Health and the U.S. Food and Drug Administration's Center for Devices and Radiological Health. (PPL St. No. 1, p. 4.)

Here, Dr. Davis offered independent, balanced, and unbiased expert opinions about the scientific merits of the RF exposure from the AMI meter that the Complainant raised in this case. (PPL St. No. 1, pp. 5-16.) Dr. Davis has an unblemished record of having his expert opinion relied upon in proceedings, including before this Commission.⁴

⁴ See, e.g., *Newman v. Motorola, Inc.*, 218 F. Supp.2d 769 (D. Md. 2002), *affirmed*, 78 Fed. Appx. 292 (4th Cir. 2003); *Frompovich v. PECO Energy Co.*, Docket No. C-2015-2474602 (Order entered May 3, 2018); *Hoffman-Lorah v. PPL Elec. Utils. Corp.*, Docket No. C-2018-2644957 (Order entered May 23, 2019).

Second, the Complainant erroneously claims that Dr. Davis inaccurately stated that the meters only transmit “once/minute(84 seconds/24 hours).” (Exceptions, p. 1.) As Dr. Davis testified, “[t]he total daily time of RF signaling from the AMI meters used by PPL Electric is 84 seconds over the course of 24 hours, with individual signal durations of only 46 to 63 milliseconds.” (PPL St. No. 1, p. 7.) This equates to between approximately 1,333 and 1,826 transmissions per day. Therefore, based on Dr. Davis’s testimony, it is clear that the meters do not only transmit “once/minute(84 seconds/24 hours).” (Exceptions, p. 1.)

Third, the ALJ correctly rejected the Complainant’s lay testimony about his self-measurements of the RF fields produced by AMI meters. (ID at 21.) As the ALJ observed, the Complainant “is not an expert witness in the fields of electrical engineering, physics, biophysics, chemistry, dosimetry or medicine.” (ID at 21.) Moreover, “[t]he Cornet EDT88 meter that Complainant used in his test can be purchased for approximately \$200 and is not a professional-grade meter.” (ID at 21.) Therefore, “the Cornet meter could have been measuring spurious signals coming in through Complainant’s neighbor’s powerline and could have been measuring signals from local television broadcast towers.” (ID at 21.) Indeed, as noted previously, the 6 television broadcast towers within a 50-mile radius of the Complainant’s property produce constant background levels of RF fields at the Complainant’s residence that are **23.3 times higher** than the RF signals from the AMI meter. (PPL St. No. 1, p. 15; PPL Exhibit CD-5.)

It is for these reasons that Dr. Davis uses professional-grade equipment to measure the RF fields produced by AMI meters. (ID at 20.) Specifically, he “used Hewlett Packard or Agilent Technologies RF equipment that costs tens of thousands of dollars, including spectrum analyzers that have peak hold capability and other features to show the spectrum of an RF signal and how long it lasts.” (ID at 20.) Based on his measurements using this professional-grade

equipment, Dr. Davis testified that the RF fields from the AMI meter are 98,000 times lower than the RF exposure safety limits established by the FCC. (ID at 20.) Moreover, “RF signals from the AMI meter are of very short duration and will occur for only a total of 84 seconds over a 24-hour period.” (ID at 20.)

In addition, Dr. Davis testified that the Complainant’s measurements could not be relied on for a more obvious reason – the Cornet EDT88 meter that the Complainant used “cannot measure above .58 watts per square meter, which is .058 milliwatts per square centimeters.”⁵ (ID at 21.) Indeed, the Complainant alleged at the hearing, using the Cornet EDT88 meter, he measured RF fields “from one meter’s distance to be in the range from 24 to 31 milliwatts per centimeter squared.” (ID at 17.) In his Exceptions, the Complainant claims that the ALJ erred in reaching this finding because he measured “24 and 31 mw/Meter squared,” not 24 to 31 milliwatts per centimeter squared. (Exceptions, p. 1.) However, the Complainant explicitly testified as follows at the evidentiary hearing:

And if I can pull up my notes here, so I don’t misspeak on the actual measurements. The actual measurements I saw at one meter, milliwatts per centimeter square, the peaks ranged in the area from 24 to 31 milliwatts per centimeter square.

(Tr. 20.) Thus, by his own admission at the evidentiary hearing, he alleged that his measurements were 24 to 31 milliwatts per centimeter squared, which Dr. Davis testified were beyond the measurement capabilities of the Cornet EDT88 meter.

Finally, the Complainant improperly attempts to introduce and rely on extra-record evidence in support of his Exceptions concerning his self-measurements using the Cornet EDT88 meter. It is well-established that parties cannot introduce evidence for the first time at the

⁵ The Complainant avers in his Exceptions that the ALJ incorrectly stated in her findings of fact that “.58 Watts/meter square” is equal to “.058 mw/cm.” (Exceptions, p. 1.) However, the Complainant overlooks that the ALJ actually stated that “.58 watts per meter squared” is “.058 mW/cm².” (ID at 5.) Therefore, when properly recognizing that the ALJ stated centimeters squared, the conversion is correct.

exceptions stage.⁶ “The Commission, as an administrative body, is bound by the due process provisions of constitutional law and by the principles of common fairness.” *Hess v. Pa. PUC*, 107 A.3d 246, 266 (Pa. Cmwlth. 2014) (citations omitted). “Among the requirements of due process are notice and an opportunity to be heard on the issues, to be apprised of the evidence submitted, to cross-examine witnesses, to inspect documents, and to offer evidence in explanation or rebuttal.” *Id.* (citations omitted).

Here, the Complainant alleges in his Exceptions that the Cornet EDT88 meter has an “actual specification” of “.5 microwatt/meter squared to 1.8watt/meter(1800 mw/meter squared),” which allegedly contradicts Dr. Davis’s testimony about the Cornet EDT88 meter’s specifications. (Exceptions, p. 1.) However, this allegation is not in the record. As such, the Complainant cannot now, for the first time in his Exceptions, attempt to introduce and rely on extra-record evidence about the range of RF fields that can be measured by the Cornet EDT88 meter. If he were permitted to do so, PPL Electric would be denied due process. Moreover, the Complainant had a full and fair opportunity to rebut Dr. Davis’s testimony at the evidentiary hearing, but he failed to do so. Further, the Complainant’s unreliable and extra-record evidence is greatly outweighed by the credible and detailed expert testimony provided by PPL Electric. (See PPL St. No. 2; Tr. 51-73)


Based on the foregoing, the Complainant’s Exceptions Nos. 1-9 should be denied.

⁶ See, e.g., *Application of Apollo Gas Co.*, 1994 Pa. PUC LEXIS 45, at *8-9 (Order entered Feb. 10, 1994) (denying party’s attempt to introduce extra-record evidence in its exceptions).

III. CONCLUSION

WHEREFORE, for all the foregoing reasons, as well as those more fully explained in the Initial Decision of Administrative Law Judge Elizabeth H. Barnes, the Company respectfully requests that the Pennsylvania Public Utility Commission deny the Exceptions filed by Thomas Maslar and adopt the Initial Decision without modification.

Respectfully submitted,



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