

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Dana Brennan, :  
 :  
 Complainant, :  
 :  
 v. : Docket No. C-2019-3007121  
 :  
 PPL Electric Utilities Corporation :  
 :  
 Respondent, :

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AUG - 7 2019

PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

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**MOTION OF MRS. DANA BRENNAN TO COMPEL  
RESPONSES TO DISCOVERY PROPOUNDED ON  
PPL ELECTRIC UTILITIES CORPORATION**

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TO ADMINISTRATIVE LAW JUDGE ELIZABETH BARNES:

Pursuant to 52 Pa. Code 5.342(g) and 5.349(d), hereby Dana Brennan files this Motion to Compel Responses to Discovery Propounded on PPL Electric Utilities Corporation Respondent.

**INTRODUCTION**

1. Letter to of concerns about the radiation emitting Smart Meter sent to PPL Electric Utilities Corporation (PP&L) dated December 14, 2018 sent via regular mail.
2. Formal Complaint sent by certified mail to the Pennsylvania Public Utility Commission January 9, 2019.
3. Rebuttal of answers of PPL Electric Utilities Corporation February 18, 2019. Sent by certified mail.
4. Letter to Attorney Devin Ryan and PPL Electric Utilities Corporation relating to opt-out of the Smart Meter. Sent by certified mail.
5. Answer to interrogatories sent by certified mail July 3, 2019.
6. Interrogatories and requests for production of documents sent by certified mail July 17, 2019. Note PP&L and Attorney Devin Ryan have not complied or answered any previous questions as of July 29, 2019.

7/29/2019

## CULPATORY EVIDENCE RESPONSE AND QUESTIONS

1, PP&L and their Attorney, Mr. Ryan's remarks and attention to my private information as only being rated at a confidential level is totally unfounded and is a misleading statement. This does not maintain a real security structure to start with. PP&L or Attorney Mr. Ryan is not in any way a guardian of any of my information. My information is not PP&L or anyone else's to guard, nor can PP&L claim responsibility for information they don't own, the disclosure of my personal information or other household members is a fundamental violation of my rights to privacy under the Constitutions Fourth Amendment. PP&L and Attorney Mr. Ryan have been reminded of this on several occasions in paperwork that PP&L and Attorney Mr. Ryan received by certified mail and he should have made the court aware of it other then a very small portion Attorney Mr. Ryan chose to cherry pick, which is totally bias.

2. Under what authority does PP&L have to demand private information when the dispute I have with PP&P is so I can maintain my privacy and to keep my home and any information safe? My family members have rights that need to be protected as well. PP&L and Attorney Mr. Ryan have no clearance or authority to arbitrarily decide to place a rating of confidential on anyone's private information, the information is not PP&L's to start with. Viewing any of my private information is a violation of my rights and the law under the Constitution Fourth Amendment and other laws that cover wire tapping, surveillance and more. PP&L and their Attorney Mr. Ryan have been made aware of this issue and should turn over all the papers they received pertaining to this matter to any court. Attorney Mr. Ryan received certified mail outlining this subject and many other issues that I have not received any reply to.

3. I have a right to keep my information safe. Any information PP&L or their attorney is requesting should be denied. Any information received by Attorney Mr. Ryan will undoubtedly be leaked back to PP&L who Attorney Mr. Ryan represents and receiving money from. MY dispute is to keep my private information out of the hands of PP&L. What privacy do I have if I have to give it up for the asking or demand without any explanation? Neither PP&L nor Attorney Mr. Ryan have a right to any information from within my home or what's on my property. PP&L and Attorney Mr. Ryan are attempting to steal my information and additionally seeking to further gather other private information from me over the years with the Smart Meter technology. This action by PP&L will take away inalienable human rights to privacy my family and I have by law. PP&L has all intentions of selling any of my information to any highest bidder without my consent or control, this is illegal.

4. As to the regards of what level I consider my information it is (SECRET) and does not belong outside of my home to anyone. The information is mine to do as I please with to send it out or keep it to myself or give it to who I please, the information is my

intellectual property. United States Repetitive and House Majority leader Congressman Mr. Kevin McCarthy said that we have the right to protect our information.

5. PP&L illegally forcing themselves into my home is no less then a total invasion of my privacy with the use of surveillance or spyware from the PP&L Smart Meter. PP&L and their Attorney Mr. Ryan received certified mail outlining this matter which should be put in front of the court for review so there could be a fair determination based on all the information that PP&L and Attorney Mr. Ryan received.

6. PP&L and Attorney Mr. Ryan request to gather my and other household member's information is doing so by only using a small part of information in papers they received from me by certified mail. This procedure is unfair and bias, there are many other mandatory papers in preparation that should be required to be turned over as well, not just a small partition that is misleading without all the other papers in Attorney Mr. Ryan possession. What was presented to the Court by Attorney Mr. Ryan at present is not complete or in any way up to date. All papers should be part of any decision so the court can have a fair opportunity not to be bias.

#### NO CONSENT

7. I am more than reluctant to think that any of my personal information that PP&L could view will remain safe when they are taken out of my control. PP&L has all intention of selling my information to the highest bidder for profit. PP&L has no right to transfer any of my private information for money or to give it away to whom PP&L pleases. PP&L never had consent to enter my property and take anything. PP&L and Attorney Mr. Ryan have been asked to produce a paper with my signature giving PP&L authority to take any information from me or other household members. PP&L and Attorney Mr. Ryan received that request by certified mail. To date I have not received any paper with my consent or any other response from PP&L or Attorney Mr. Ryan regarding this matter.

8. PP&L and Attorney Mr. Ryan have received papers from me by certified mail requesting that they provide me with answers to all the questions that I brought forth so I could properly represent myself. Attorney Mr. Ryan was given the same time line of 20 days to return the answers from PP&L. To date I have not receive any answers whatsoever.

#### PLEASE FIND ENCLOSED COPY PP&L DIAGRAM

#### "WHAT'S YOUR'S? WHAT'S OUR'S?"

9. PP&L diagram titled "What's yours? What's ours?" The diagram was produced by PP&L and publicized on their own home page or web sight to demonstrate the separation of what PP&L is responsible for and what the home owner must be responsible for. PP&L Attorney Mr. Ryan had received certified mail bringing this matter to his attention. I had previously stated that PP&L had always limited themselves to specific areas and

responsibilities as illustrated in the PP&L diagram showing where their responsibility begins and where it ends. The diagram clearly shows that PP&L had no previous authorization or claim that they ever had ANY ACCESS to an individual home, PP&L diagrams clearly show this.

PP&L is claiming that what was once mine now became theirs too. PP&L's action in this matter is against my constitutional rights to privacy and other laws that prohibit taking something that PP&L has no rights to as illustrated in their own diagram. This was brought to Attorney MR. Ryan's attention by means of certified mail that the Court should review.

### ILLEGALLY EXPANDING

10. PP&L is now illegally expanding from what was traditionally or lawfully their territory and responsibility. PP&L never had a right of way to the homeowners wiring, breaker box or anything within the property owner's home. PP&L has always maintained that whatever was in the homeowner's home was the owners responsibility not PP&L. PP&L has clearly disregarded their own diagram titled "What's yours? What's ours?". The diagram clearly shows that PP&L has over stepped their boundaries when they entered onto a private home and property for their use to profit. Therefore PP&L has no entitlement or claim whatsoever to use or sell anything in my home from their Smart Meter to gather personal and private information. PP&L using my home wiring for surveillance, wire tapping and as an antenna is trespassing and illegal.

11. PP&L never received any clearance or consent by me to use their Smart Meter on my property but was told not to install it. However at a later date PP&L trespassed onto my property and installed the Smart Meter. PP&L and Attorney Mr. Ryan received certified mail with other papers detailing this. I am requesting that without exception all certified mail and their contents that PP&L and Attorney Mr. Ryan received from me be placed in front of the court for review.

PP&L action in this matter is unlawful and unconstitutional as to my right to privacy in my home and on my property. PP&L and Attorney Mr. Ryan did not respond to any of the paperwork or answer any questions why?

### UNITED STATES REPRESENTATIVE (PRODUCT)

12. House Majority Leader Mr. Kevin McCarthy stated that, with the collection of our private information, we are not the client anymore but the (product) when anyone takes your private information and sells it. Mr. McCarthy said we have a right to our private information and we should be able to protect it.

The information in my the home in not owned by PP&L, any other company, corporation or anyone else seeking to take private information and to sell it for a profit. Prior to the Smart Meter I had always paid for the use of the clean electricity that was provided to me and have always been treated as a customer and client. How did I become the (Product) When did I agree to change the arrangement?

### WHEN DID IT BECOME LEGAL?

13. When did it become legal? If someone bought chicken feed from a dealer does the same dealer of the feed have a right to go into the buyer's chicken coop and help themselves to chickens or eggs? Is the chicken feed dealer entitled to be paid twice by taking what wasn't his to start with? What other arrangement of payment did I ever agree to with PP&L other than to pay money for clean energy once? When did I ever say to PP&L come into my home and take anything at all? How many times do I have to pay PP&L?

### SUPREME COURT

14. The Supreme Court had already ruled, that no one has a right to take anything from anyone, it is mandatory that PP&L or law enforcement first retain a court order with good cause. PP&L took the law into their own hands by illegally forcing a Smart Meter surveillance device onto my private property. From the start PP&L had full intentions of gathering information from my home through electronics or microwave technologies. Who gave PP&L the right to disregard my Constitutional Right of the Fourth Amendment and other privacy rights under the law? The above topic was sent to PP&L and Attorney Mr. Ryan. Why have I not received a response?

### HEALTH PROBLEMS

15. PP&L and Attorney Mr. Ryan were provided with a long list of health problems that the radiation, microwave emitting, Smart Meter technology cause. This large list of health issues to include such things as cancer has been totally ignored by both PP&L and Attorney Mr. Ryan. To date I have no response concerning the health issues by either PP&L or Attorney Mr. Ryan. Please respond to the information that you were provided with by certified mail concerning the above subject as well as all other questions you were asked to respond to in the past.

### SETTLEMENT OF DISPUTE

PP&L and their Attorney Mr. Ryan had always been made aware from the start that this dispute could simply be resolved by reinstalling my Analog Meter as other company's have already done with an opt-out.

I understand that there was an opt-out how did that change and when?

### DODGING QUESTION

PP&L and Attorney Mr. Ryan have been dodging all questions put forth by myself in many papers sent to them by certified mail. I am entitled to have all question answered in

a timely matter. PP&L along with Attorney Mr. Ryan have failed to do so. I was never supplied with any disclosure or answers too many questions put forth to PP&L as of today this date 7/29/2019. This action of dodging questions by PP&L is unfair and bias.

**RIGHT TO KNOW LAW  
DISCLOSURE**

I have the right to a full disclosure of all studies of the Smart Meter and what health risks my family and I could be subjected to. PP&L and Attorney Mr. Ryan have been asked to provide a number of documents pertaining to this matter to include reports, studies, literature and findings to what health issues could be at risk. Mr. Barrie Trower, Royal Navy Microwave expert, lectures around the world of the danger of microwave technology from Smart Meters and how harmful it is to humans. Top scientists from 40 Countries repeat that the technology is dangerous. This and all other health issues have been ignored by PP&L and Attorney Mr. Ryan. I have a right to know if there are any health risks.

PP&L and Attorney Mr. Ryan received certified mail asking them to release all the material for review and to date they have not produced anything at all.

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SECRETARY'S BUREAU

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Mrs. Dana Brennan,  
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Complainant,  
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Respondent,  
:

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NOTICE TO PLEAD

Answer filed with the Secretary, Rosemary Chiavetta

*Dana Brennan* 7/29/19  
Dana Brennan  
16 Oslo Way  
Newfoundland, PA 18445

Notice to plead has been sent to the following:

Secretary Rosemary Chiavetta  
Pennsylvania Public Utilities Commission  
Commonwealth Keystone building  
400 North Street, 2<sup>nd</sup> floor North  
P.O. Box 3265  
Harrisburg, PA 17105-3265  
Via regular mail

Devin T. Ryan (ID#316602)  
Garrett P. Lent (ID# 321566)  
Post & Schell, P.C.  
17 North Second Street, 12<sup>th</sup> floor  
Harrisburg, PA 17101-1601  
Via certified mail

Honorable Elizabeth Barnes  
Administrative Law Judge  
400 North Street  
Harrisburg, PA 17120  
Via certified mail

Curtis Renner (ID#326488)  
Watson & Renner  
1901 Pennsylvania Avenue, NW  
Suite 1005-ENS  
Washington, DC 2000  
Via regular mail

Kimberly A. Klock (ID#89716)  
Michael J. Shafer (ID#205681)  
PPL Service Corporation  
Two North Ninth Street  
Allentown, PA 18101  
Via regular mail

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