



17 North Second Street  
12th Floor  
Harrisburg, PA 17101-1601  
717-731-1970 Main  
717-731-1985 Main Fax  
www.postschell.com

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Devin Ryan

dryan@postschell.com  
717-612-6052 Direct  
717-731-1985 Direct Fax  
File #: 167945

August 20, 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: Dana Brennan v. PPL Electric Utilities Corporation**  
**Docket No. C-2019-3007121**

Dear Secretary Chiavetta:

Enclosed for filing is the Answer of PPL Electric Utilities Corporation to the Complainant's Motion to Compel Responses to Discovery Propounded by Dana Brennan – Set I 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 (*w/enclosures*)  
Certificate of Service

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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

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**ANSWER OF PPL ELECTRIC UTILITIES CORPORATION TO THE  
MOTION OF DANA BRENNAN TO  
DISMISS OBJECTIONS AND COMPEL ANSWERS TO INTERROGATORIES**

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**TO ADMINISTRATIVE LAW JUDGE ELIZABETH H. BARNES:**

Pursuant to 52 Pa. Code § 5.342(g)(1), PPL Electric Utilities Corporation (“PPL Electric” or the “Company”) hereby files this Answer to Dana Brennan’s (“Complainant”) Motion to Dismiss PPL Electric’s Objections and Compel Answers to Interrogatories (“Motion to Compel” or “Motion”).<sup>1</sup> As explained herein, Administrative Law Judge Elizabeth H. Barnes (the “ALJ”) should deny the Complainant’s Motion. PPL Electric properly objected to Definitions 2 and 4-21 and Interrogatories 3-6, 10-13, and 15-44 on the grounds that they are vague, overly broad, unduly burdensome, speculative, unintelligible, irrelevant, and not reasonably calculated to lead to the discovery of admissible evidence as well as assume facts not in evidence, improperly seek a legal opinion, improperly seek communications and materials protected by attorney-client

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<sup>1</sup> The Complainant filed an “Objection by Dana Brennan to PPL Electric Utilities Corporations [sic] Objections to the Interrogatories dated July 17, 2019.” The “Objection” disputes PPL Electric’s objections to her first set of Interrogatories, reiterates many of the Complainant’s arguments for why she believes that PPL Electric should not have installed an automated metering infrastructure (“AMI”) meter at her property, and includes additional discovery requests. PPL Electric is treating this “Objection” as a Motion to Compel out of an abundance of caution.

privilege and attorney work product doctrine, and/or seek highly confidential cybersecurity information.

Notwithstanding, in the interest of compromise and administrative efficiency, PPL Electric has agreed to answer the remainder of Complainant's first set of Interrogatories ("Complainant Set I") without waiver of its objections and subject to the proposed limitations to Interrogatories 5, 6, 15, 19, 25A, 26, 30, 31, and 34. Therefore, the Company maintains that the Complainant's Motion will be rendered moot after the Company's serves these responses in the near future. In support of its Answer, PPL Electric states as follows:

**I. INTRODUCTION**

1. On July 17, 2019, the Complainant served Complainant Set I on PPL Electric via first class mail only.<sup>2</sup> A true and correct copy of Complainant Set I is attached as **Appendix A**.

2. On July 30, 2019, PPL Electric timely served its Objections to Complainant's first set of discovery. Specifically, PPL Electric objected to Definitions 2 and 4-21 and Interrogatories 3-6, 10-13, and 15-44. A true and correct copy of PPL Electric's Objections is attached as **Appendix B**.

3. On August 9, 2019, PPL Electric timely served its Answers to the remaining Interrogatories in Complainant Set I, *i.e.*, Interrogatories 1-2, 7-9, 14, and 45.

4. On August 12, 2019, Complainant filed her "Objection by Dana Brennan to PPL Electric Utilities Corporations [sic] Objections to the Interrogatories dated July 17, 2019." Although the cover letter is dated August 1, 2019, the mailing label shows that the document was

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<sup>2</sup> Because the interrogatories were only served via regular mail, three days were added to the prescribed response period. *See* 52 Pa. Code § 1.56(b).

sent on August 12, 2019, via first class mail.<sup>3</sup> A true and correct copy of the mailing label is attached as **Appendix C**.

5. 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. *Id.*

6. As noted by the Superior Court of Pennsylvania, “While discovery should be liberally allowed, ‘fishing expeditions’ are not to be countenanced under the guise of discovery.” *Land v. State Farm Mutual Ins. Co.*, 600 A.2d 605, 608 (Pa. Super. 1991) (emphasis added).

7. “[T]he standard for discovery is relevance, not curiosity.” *Pa. PUC v. Pennsylvania-American Water Co.*, Docket Nos. R-2011-2232243, *et al.*, at 22 (July 21, 2011) (Order on Motion to Compel).

8. For the reasons stated in more detail below, PPL Electric respectfully requests that the ALJ deny Complainant’s Motion to Compel.

## **II. COMPLAINANT’S MOTION TO COMPEL RESPONSES TO INTERROGATORIES SHOULD BE DENIED**

### **A. OBJECTIONS TO DEFINITIONS 2 AND 4 THROUGH 21**

9. Complainant Set I, Definitions 2 and 4 through 21 provide the following definitions for various terms:

2. EMF means Electro Magnetic Frequency.

...

4. Smart Meter means Microwave technology emitting radiation.

5. Spyware means surveillance technology employed from Smart Meters.

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<sup>3</sup> Because the Motion to Compel was served via first class mail, three days were added to the prescribed five-day response period. *See* note 2, *supra*; 52 Pa. Code § 5.342(g)(1).

6. Trespassing means unauthorized PPL Electric Utilities Corporation on your property.
7. Documentation means to supply everything requested.
8. Constitutional rights means laws to protect people to assure we have rules and regulations governing what is right and not interfered with.
9. Wire tapping means the unlawful means to collect information without authorization.
10. Northern California means the death of 85 people related to GP&E Electric Utilities Corporation and their bankruptcy.
11. Mr. Barrie Trower means Royal Navy microwave expert who lectures around the world of the dangers of microwave technology from Smart Meters.
12. Facebook means lawsuit for billions of dollars for the release of personal information of their customers.
13. Vizio Corporation means loss of class action suit for surveillance and invasion of privacy.
14. Supreme Court means recognition of fundamental rights mentioned in the Constitution that is an inherent part of liberty including privacy rights.
15. Historic Supreme Court 9-0 decision means no one can take away anyone's Constitutional rights.
16. Hacked means the Smart Meter technology makes it easier for unauthorized personnel like PP&L or thieves to illegally collect information and manipulate other wifi technology in the home to commit theft, etc.
17. Under the right to know means studies, documentation, and literature of Smart Meter radiation technology findings to be released.
18. Opt-out means the desire to end dangerous Smart Meter technology, microwaves and radiation to be replaced with the original Analog Meter.
19. Compulsory control means forced upon customers without their consent.

20. Profiling means collecting information from a household illegally to put together a record of how an individual family conducts its life to include habits, likes and dislikes that could be sold on the open market to the highest bidder.

21. Court Order means when authorized personnel such as the FBI, CIA, Police or other law enforcement can prove to have good cause to search an individual's home with a search warrant.

10. The Company objected to Complainant Set I, Definitions 2 and 4 through 21 on the grounds that the definitions are vague, overly broad, and unintelligible as well as assume facts not in evidence.

11. First, all of these Definitions are completely vague and unintelligible. The definitions fail to provide specific and clear definitions of these various terms, thereby making their use in the Interrogatories extremely difficult to discern and confusing. For example, Definition 10 says that "Northern California" means "the death of 85 people related to GP&E Electric Utilities Corporation and their bankruptcy." It is completely unclear how a geographic region could mean the deaths of 85 people and a declaration of bankruptcy. Similarly, Definition 12 defines "Facebook," a social media corporation, as a "lawsuit for billions of dollars for the release of personal information of their customers." Thus, not only are many of the terms vague, but they proffer definitions that are contrary to their ordinary and plain meanings.

12. Second, Definitions 2, 4-9, 16-17, 19, and 20 are overly broad. These terms are not reasonably limited in scope and, as a result, make the Interrogatories in which they are used overly broad as well. As an example, "Documentation" is defined as "supply everything requested." However, the documents and information to be produced in the Company's discovery responses will be limited to those requests that are not objectionable, not every request propounded on the Company.

13. Third, Definitions 5, 6, and 18 assume facts not in evidence. Definition 5 assumes that “surveillance technology” is “employed from Smart Meters,” Definition 6 assumes that PPL Electric accesses property without authorization, and Definition 18 assumes that the “Smart Meter” is a “dangerous” piece of equipment. These assumptions are neither correct nor are they in the record.

14. Based on the foregoing, these Definitions are vague, overly broad, and unintelligible as well as assume facts not in evidence.

15. Notwithstanding, as explained in several sections below, and without waiver of these objections, PPL Electric will try to apply these Definitions as reasonably limited in scope based on their ordinary and plain meanings in answering many of the Complainant’s Interrogatories in the interest of compromise and administrative efficiency.

**B. OBJECTIONS TO INTERROGATORY 3**

16. Complainant Set I, Interrogatory 3 requests the following:

3. PP&L Smart Meter installer was told personally not to install the Smart Meter and left. Then on a later date came back onto the property by trespassing and installed the Smart Meter without any consent or notice to the property owner. By what right does PP&L have to put microwave technology or spy ware on any ones property without consent?

17. The Company objected to Complainant Set I, Interrogatory 3 because it is vague, assumes facts not in evidence, and improperly seeks a legal opinion.

18. First, the interrogatory is vague as to what “microwave technology” and “spy ware” mean in this context. Indeed, it is unclear whether these terms simply mean the new automated metering infrastructure (“AMI”) meter or something else. Moreover, this discovery request generally refers to “Smart Meter” but fails to specify the precise model type. As a result, the request is not limited to the actual Landis + Gyr AMI meters that PPL Electric is deploying

for its residential customers, including the Complainant. Specifically, the AMI meter installed on the Complainant's property is the Landis + Gyr E350 FOCUS AXR-SD meter. Without such clarification, PPL Electric cannot reasonably answer the interrogatory. Notably, the Complainant fails to provide this clarification in her Motion to Compel.

19. Second, the interrogatory assumes facts not in evidence, particularly regarding the complainant's interactions with a "Smart Meter installer." Further, the interrogatory claims that PPL Electric installed the AMI meter without any "notice to the property owner" and asserts, potentially, that the AMI meter would be "spy ware." None of these alleged facts are in the record.

20. Third, the interrogatory improperly seeks a legal opinion. The Company's witnesses are not lawyers who can provide legal opinions. Further, discovery is intended for the discovery of facts and evidence that may be presented at the evidentiary hearing, not the legal opinions of the Company's attorneys that are protected by attorney-client privilege and the attorney work product doctrine. Rather, PPL Electric's legal arguments will be set forth in its closing argument and its briefs, if any, that are submitted in this proceeding.

21. For these reasons, this interrogatory is vague, assumes facts not in evidence, and improperly seeks a legal opinion.

22. Notwithstanding, and without waiver of these objections, PPL Electric will answer this Interrogatory in the interest of compromise and administrative efficiency.

**C. OBJECTIONS TO INTERROGATORY 4**

23. Complainant Set I, Interrogatory 4 requests the following:

4. PP&L was informed by phone and certified mail to remove the dangerous Smart Meter due to it being unsafe and threatening to our family's health as outlined in all the letters received by PP&L and their attorneys. Why then at this late date has the Smart Meter not been removed? Refer to all the certified mail and their contents

explaining my rejection to the Smart Meter and add the entire contents as argument.

24. The Company objected to Complainant Set I, Interrogatory 4 because it is vague and assumes facts not in evidence.

25. First, the interrogatory is vague as to what “unsafe” and “threatening to our family’s health” mean. Moreover, the interrogatory generally tries to refer to unspecified phone conversations and documents allegedly sent by certified mail. Further, this discovery request generally refers to “Smart Meter” but fails to specify the precise model type. As a result, the request is not limited to the actual Landis + Gyr AMI meters that PPL Electric is deploying for its residential customers, including the Complainant. Specifically, the AMI meter installed on the Complainant’s property is the Landis + Gyr E350 FOCUS AXR-SD meter. Without such clarification, PPL Electric cannot reasonably answer the interrogatory. Notably, the Complainant fails to provide this clarification in her Motion to Compel.

26. Second, the interrogatory assumes facts not in evidence, such as the AMI meter being “unsafe” and “threatening to [the Complainant’s] family’s health” as well as the contents of these unspecified documents allegedly sent by certified mail. None of these alleged facts are in the record.

27. Based on the foregoing, this interrogatory is vague and assumes facts not in evidence.

28. Notwithstanding, and without waiver of these objections, PPL Electric will answer this Interrogatory in the interest of compromise and administrative efficiency.

**D. OBJECTIONS TO INTERROGATORY 5**

29. Complainant Set I, Interrogatory 5 requests the following:

5. Northern California lost 90% of their population due to GP&E Electric Utilities Corporation fires caused by Smart Meters. Many

people had to relocate and 85 people were killed as a result of the fires. GP&E now filed for bankruptcy citing over \$30 Billion in claims. What insurance does PP&L Electric Utilities give my family if there is a fire or my family becomes sick from the EMF radiation transmitted from the Smart Meter?

30. The Company objected to Complainant Set I, Interrogatory 5 because it is vague, speculative, and not reasonably calculated to lead to the discovery of admissible evidence and assumes facts not in evidence.

31. First, the interrogatory is vague, speculative, and not reasonably calculated to lead to the discovery of admissible evidence. The interrogatory posits a completely speculative scenario in which a “fire” under unspecified circumstances is caused by the AMI meter as well as a family member becoming “sick” from the “EMF radiation.” Moreover, it is unclear what “insurance” the Complainant is referencing, whether it is an insurance policy or some other type of “insurance.” PPL Electric notes that the Complainant fails to provide any clarification in her Motion to Compel.

32. Second, the interrogatory assumes facts not in evidence, such as the fire in Northern California where, according to the interrogatory, “90% of their population” was lost due to “GP&E Electric Utilities Corporation fires caused by Smart Meters.” Not only are these allegations completely inaccurate, as it appears the Complainant may be referring to the incidents involving Pacific Gas & Electric Company (“PG&E”) that did not involve AMI meters causing wildfires and obviously Northern California did not lose “90% of their population,” but none of these alleged facts are in the record.

33. Based on the foregoing, this interrogatory is vague and assumes facts not in evidence.

34. Notwithstanding, and without waiver of these objections, PPL Electric would be willing to answer this Interrogatory as limited to the following: “Does PPL Electric maintain general corporate liability insurance?”

**E. OBJECTIONS TO INTERROGATORY 6**

35. Complainant Set I, Interrogatory 6 requests the following:

6. What insurance company is PP&L insured with?

36. The Company objected to Complainant Set I, Interrogatory 6 because it is vague, overly broad, irrelevant, and not reasonably calculated to lead to the discovery of admissible evidence.

37. The interrogatory fails to specify what actual insurance policy details it is seeking. It simply asks the Company to provide the name of the “insurance company” it is “insured with.” There is no limitation to the actual insurance policies that would be related to the Company’s AMI meters. Moreover, the Company’s decision to insure or self-insure its various practices is irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. PPL Electric notes that the Complainant fails to provide any clarification in her Motion to Compel.

38. For these reasons, this interrogatory is vague, overly broad, irrelevant, and not reasonably calculated to lead to the discovery of admissible evidence.

39. Notwithstanding, and without waiver of these objections, PPL Electric would be willing to answer this Interrogatory as limited to the following: “Does PPL Electric maintain general corporate liability insurance?”

**F. OBJECTIONS TO INTERROGATORY 10**

40. Complainant Set I, Interrogatory 10 requests the following:

10. PP&L is using the Smart Meter to gather information from my home and off of my property to sell to a third party without

consent. What right does PP&L have to take any information I didn't consent to?

41. The Company objected to Complainant Set I, Interrogatory 10 because it assumes facts not in evidence and improperly seeks a legal opinion.

42. First, the interrogatory assumes facts not in evidence. The interrogatory assumes that PPL Electric "sell[s]" information gathered from the Complainant's AMI meter to "third part[ies] without consent." None of these alleged facts are in the record.

43. Second, the interrogatory improperly seeks a legal opinion. The Company's witnesses are not lawyers who can provide legal opinions. Further, discovery is intended for the discovery of facts and evidence that may be presented at the evidentiary hearing, not the legal opinions of the Company's attorneys that are protected by attorney-client privilege and the attorney work product doctrine. Rather, PPL Electric's legal arguments will be set forth in its closing argument and its briefs, if any, that are submitted in this proceeding.

44. Based on the foregoing, this interrogatory assumes facts not in evidence and improperly seeks a legal opinion.

45. Notwithstanding, and without waiver of these objections, PPL Electric will answer this Interrogatory in the interest of compromise and administrative efficiency.

**G. OBJECTIONS TO INTERROGATORY 11**

46. Complainant Set I, Interrogatory 11 requests the following:

11. PP&L is engaging in wire tapping without a Court Order. Under what law does PP&L have the right to violate my Constitutional rights to privacy and other laws as stated in the number of certified mail sent to both PP&L and their attorneys?

47. The Company objected to Complainant Set I, Interrogatory 11 because it assumes facts not in evidence and improperly seeks a legal opinion.

48. First, the interrogatory assumes facts not in evidence. The interrogatory assumes that PPL Electric is “engaging in wire tapping without a Court Order” and that PPL Electric “violate[s]” constitutional rights to privacy and other laws. None of these alleged facts are in the record.

49. Second, the interrogatory improperly seeks a legal opinion. The Company’s witnesses are not lawyers who can provide legal opinions. Further, discovery is intended for the discovery of facts and evidence that may be presented at the evidentiary hearing, not the legal opinions of the Company’s attorneys that are protected by attorney-client privilege and the attorney work product doctrine. Rather, PPL Electric’s legal arguments will be set forth in its closing argument and its briefs, if any, that are submitted in this proceeding.

50. For these reasons, this interrogatory assumes facts not in evidence and improperly seeks a legal opinion.

51. Notwithstanding, and without waiver of these objections, PPL Electric will answer this Interrogatory in the interest of compromise and administrative efficiency.

#### **H. OBJECTIONS TO INTERROGATORY 12**

52. Complainant Set I, Interrogatory 12 requests the following:

12. Over the years PP&L received payments form [sic] me in the form of money for their service without any other demand or additional conditions or compensation. Why is PP&L now demanding more in return for electric service provided through the Smart Meter when we initially objected to the installation and made it clear we wanted to keep an Analog meter?

53. The Company objected to Complainant Set I, Interrogatory 12 because it is vague and assumes facts not in evidence.

54. First, the interrogatory is vague. The discovery request is completely unclear as to what “demanding more in return for electric service” means. For example, this language

could be read to encompass financial compensation or something else. Therefore, the interrogatory is entirely vague. PPL Electric notes that the Complainant fails to provide any clarification in her Motion to Compel.

55. Second, the interrogatory assumes facts not in evidence. The interrogatory assumes that PPL Electric is “demand more in return for electric service provided through the Smart Meter.” Even assuming this language was not vague, there is nothing in the record establishing that PPL Electric does in fact “demand[] more in return for electric service provided through the Smart Meter.”

56. Based on the foregoing, this interrogatory is vague and assumes facts not in evidence.

57. Notwithstanding, and without waiver of these objections, PPL Electric will answer this Interrogatory in the interest of compromise and administrative efficiency.

#### **I. OBJECTIONS TO INTERROGATORY 13**

58. Complainant Set I, Interrogatory 13 requests the following:

13. PP&L will sell any information they unlawfully gathered from me, how much money will PP&L make from me and all the other PP&L customers on a yearly basis? Please enter cash Amount \_\_\_\_\_.

59. The Company objected to Complainant Set I, Interrogatory 13 because it assumes facts not in evidence.

60. The interrogatory assumes that PPL Electric “will sell any information” obtained from the new AMI meter and that the Company “unlawfully gather[s]” such information. None of these alleged facts are in the record. Moreover, the Company does not sell information collected through the AMI meter.

61. Based on the foregoing, this interrogatory assumes facts not in evidence.

62. Notwithstanding, and without waiver of these objections, PPL Electric will answer this Interrogatory in the interest of compromise and administrative efficiency.

**J. OBJECTIONS TO INTERROGATORY 15**

63. Complainant Set I, Interrogatory 15 requests the following:

15. To date: Give the number of PP&L customers who have requested to opt-out of the Smart Meter due to fear of health problems caused by PP&L's Smart Meter dangerous radiation levels. Please include customers that don't want PP&L spyware or surveillance of their private information. Amount \_\_\_\_\_.

a. Pennsylvania customers are forced to call an out of state representative when attempting to make a complaint or request to opt-out from the Smart Meter. PP&L is purposely re-routing Pennsylvania customers making it extremely inconvenient to place a complaint so that the customers are discourage from making a complaint. Give a full disclosure of out of state phone calls as well as letters from PP&L customers requesting to opt-out of the Smart Meter?

b. Who schooled the out of state PP&L representatives who receive complaints and concerns from customers in Pennsylvania concerning PP&L installing Smart Meters on their homes and properties after being instructed not to trespass or install a Smart Meter?

c. It is PP&L's common practice to tell customers that if they don't want the Smart Meters PP&L will discontinue their electrical service entirely. When did PP&L start a compulsory control over the Pennsylvania people with the Smart Meter?

d. Please provide all the names of PP&L personal [sic] and board members with the authority to demand change over my state law regulations and Constitutional rights?

64. The Company objected to Complainant Set I, Interrogatory 15 because it is vague, overly broad, irrelevant, and not reasonably to lead to the discovery of admissible evidence as well as assumes facts not in evidence and improperly seeks a legal opinion.

65. First, the interrogatory makes several assumptions of fact that are not in evidence, including that the radio frequency (“RF”) field emissions from the AMI meter are “dangerous radiation levels,” that the Company is deploying “spyware or surveillance of [customers’] private information,” that “Pennsylvania customers are forced to call an out of state representative when attempting to make a complaint or request to opt-out,” that the Company is “purposely re-routing Pennsylvania customers” to discourage customers from making complaints, and that PPL Electric has “compulsory control over the Pennsylvania people with the Smart Meter.” None of these alleged facts are in the record.

66. Second, the interrogatory is vague. It is unclear what is meant by the Company “re-routing Pennsylvania customers,” the “out of state PP&L representatives” being “schooled” about the AMI meters, the alleged “compulsory control over the Pennsylvania people,” and “demand[ing] change over [the Complainant’s] state law regulations and Constitutional rights.” PPL Electric notes that the Complainant fails to provide any clarification in her Motion to Compel.

67. Third, the interrogatory is overly broad, irrelevant, and not reasonably calculated to lead to the discovery of admissible evidence. The scope of the instant Complaint is limited to the deployment of the new AMI meter on the Complainant’s property. The Complainant does not have standing to represent the interests of every other PPL Electric customer. Moreover, subpart (a) asks the Company to “[g]ive a full disclosure of out of state phone calls as well as letters from PP&L customers requesting to opt-out of the Smart Meter.” The Company is finishing the process of deploying new AMI meters for 1.4 million customers. PPL Electric reasonably cannot be expected to provide a written account of all “out of state phone calls,”

whatever they may be, and any letters sent by customers to the Company objecting to the AMI meter deployment.

68. Fourth, subpart (d) of the interrogatory improperly seeks a legal opinion. The Company's witnesses are not lawyers who can provide legal opinions. Further, discovery is intended for the discovery of facts and evidence that may be presented at the evidentiary hearing, not the legal opinions of the Company's attorneys that are protected by attorney-client privilege and the attorney work product doctrine. Rather, PPL Electric's legal arguments will be set forth in its closing argument and its briefs, if any, that are submitted in this proceeding.

69. Based on the foregoing, this interrogatory is vague, overly broad, irrelevant, and not reasonably to lead to the discovery of admissible evidence as well as assumes facts not in evidence and improperly seeks a legal opinion.

70. Notwithstanding, and without waiver of these objections, PPL Electric will answer the main question and subparts (b) through (d) of this Interrogatory in the interest of compromise and administrative efficiency. For subpart (a), the Company would be willing to answer the following: "Please describe the Company's customer communication policy and practices concerning: (1) the deployment of the new AMI meters; and (2) customers contacting the Company to dispute the installation of the AMI meters."

**K. OBJECTIONS TO INTERROGATORY 16**

71. Complainant Set I, Interrogatory 16 requests the following:

16. PP&L was aware that the Smart Meter that they forced on me and other customers has many health risks. Why didn't PP&L give me and other customer's realistic facts and notice of the health risks that come with the Smart Meter?

72. The Company objected to Complainant Set I, Interrogatory 16 because it is vague, speculative, overly broad, irrelevant, and not reasonably to lead to the discovery of admissible evidence as well as assumes facts not in evidence.

73. First, the interrogatory makes several assumptions of fact that are not in evidence, including that the Company allegedly “was aware that the Smart Meter . . . has many health risks” and that PPL Electric failed to provide the Complainant and other customers “realistic facts.” None of these alleged facts are in the record.

74. Second, the interrogatory is vague and speculative. It is unclear what is meant by “health risks,” as the discovery request fails to actually specify what those alleged health risks are. Moreover, answering this discovery request would require PPL Electric to speculate about alleged “health risks” for both the Complainant and unnamed “other customers.” PPL Electric notes that the Complainant fails to provide any clarification in the Motion to Compel.

75. Third, the interrogatory is overly broad, irrelevant, and not reasonably calculated to lead to the discovery of admissible evidence. The scope of the instant Complaint is limited to the deployment of the new AMI meter on the Complainant’s property. The Complainant does not have standing to represent the interests of every other PPL Electric customer.

76. Based on the foregoing, this interrogatory is vague, speculative, overly broad, irrelevant, and not reasonably to lead to the discovery of admissible evidence as well as assumes facts not in evidence.

77. Notwithstanding, and without waiver of these objections, PPL Electric will answer this Interrogatory in the interest of compromise and administrative efficiency.

**L. OBJECTIONS TO INTERROGATORY 17**

78. Complainant Set I, Interrogatory 17 requests the following:

17. What right does PP&L have to know what electric appliances that I have or the make of the appliance?

79. The Company objected to Complainant Set I, Interrogatory 17 because it improperly seeks a legal opinion.

80. The Company's witnesses are not lawyers who can provide legal opinions. Further, discovery is intended for the discovery of facts and evidence that may be presented at the evidentiary hearing, not the legal opinions of the Company's attorneys that are protected by attorney-client privilege and the attorney work product doctrine. Rather, PPL Electric's legal arguments will be set forth in its closing argument and its briefs, if any, that are submitted in this proceeding.

81. For these reasons, the interrogatory improperly seeks a legal opinion.

82. Notwithstanding, and without waiver of these objections, PPL Electric will answer this Interrogatory in the interest of compromise and administrative efficiency.

**M. OBJECTIONS TO INTERROGATORY 18**

83. Complainant Set I, Interrogatory 18 requests the following:

18. What right does PP&L have to invade our privacy through the Smart Meter by profiling my family and I by knowing when we get up in the morning, leave the house, go from room to room, come home, go to bed, or what we may be viewing on TV?

NOTE: Vizio TV company recently lost a class action law suit for using their Smart TV's to surveillance customers as PP&L is attempting to do to us with the Smart Meter.

a. Other PP&L customers and I have experienced electrical equipment such as a TV turning itself off without any explanation other than the recent Smart Meter installation. What right does PP&L have to determine when a customer's

use of electric should be terminated other than non-payment of a bill?

84. The Company objected to Complainant Set I, Interrogatory 18 because it is irrelevant, assumes facts not in evidence, and improperly seeks a legal opinion.

85. First, the interrogatory assumes facts not in evidence, including that the Company “profil[es]” the Complainant and her family “by knowing when [they] get up in the morning, leave the house, go from room to room, come home, go to bed, or what [they] may be viewing on TV” and that the Complainant and other unnamed “PP&L customers” have “experienced electrical equipment such as a TV turning itself off without any explanation other than the recent Smart Meter installation.” Moreover, the discovery request references an alleged class action lawsuit involving Vizio smart televisions and claims that PPL Electric is trying to do the same as Vizio. None of these alleged facts is in the record.

86. Second, the interrogatory improperly seeks a legal opinion. The Company’s witnesses are not lawyers who can provide legal opinions. Further, discovery is intended for the discovery of facts and evidence that may be presented at the evidentiary hearing, not the legal opinions of the Company’s attorneys that are protected by attorney-client privilege and the attorney work product doctrine. Rather, PPL Electric’s legal arguments will be set forth in its closing argument and its briefs, if any, that are submitted in this proceeding.

87. Third, the alleged Vizio class action lawsuit is irrelevant to this proceeding. The issues in this formal complaint proceeding are limited to whether the Company is legally required to install the new AMI meter and whether such installation would violate Section 1501 of the Public Utility Code, 66 Pa. C.S. § 1501, which requires the Company to provide safe, reliable, and reasonable service to its customers. The alleged Vizio class action lawsuit has nothing to do with the resolution of these issues.

88. Based on the foregoing, the interrogatory is irrelevant, assumes facts not in evidence, and improperly seeks a legal opinion.

89. Notwithstanding, and without waiver of these objections, PPL Electric will answer this Interrogatory in the interest of compromise and administrative efficiency.

**N. OBJECTIONS TO INTERROGATORY 19**

90. Complainant Set I, Interrogatory 19 requests the following:

19. PP&L has made it easier for my home to be hacked into with the Smart Meter. So the question is: If the privacy of our home is hacked into and our personal information is stolen with other items, how will PP&L compensate us for making us and our home more vulnerable?

91. The Company objected to Complainant Set I, Interrogatory 19 because it is vague, speculative, and not reasonably calculated to lead to the discovery of admissible evidence and assumes facts not in evidence.

92. First, the interrogatory assumes facts not in evidence, particularly that the Company allegedly “has made it easier for [the Complainant’s] home to be hacked into with the Smart Meter.” This alleged fact is not in the record and cannot be assumed in this interrogatory as being true.

93. Second, the interrogatory is vague, speculative, and not reasonably calculated to lead to the discovery of admissible evidence. The interrogatory posits a completely speculative scenario in which the Complainant’s “home” is hacked and her family’s “personal information” is stolen under unspecified circumstances and asks the Company to indicate how it will “compensate” them in this vague and speculative situation. PPL Electric notes that the Complainant fails to provide any clarification in the Motion to Compel.

94. Moreover, the issues in this formal complaint proceeding are limited to whether the Company is legally required to install the new AMI meter and whether such installation

would violate Section 1501 of the Public Utility Code, 66 Pa. C.S. § 1501, which requires the Company to provide safe, reliable, and reasonable service to its customers. The Company's willingness to compensate customers under vague, hypothetical circumstances has nothing to do with the resolution of these issues. Further, PPL Electric's decision whether or not to compensate customers in the future should not and cannot be construed as an admission of the new AMI meters presenting privacy concerns.

95. Based on the foregoing, the interrogatory is vague, speculative, and not reasonably calculated to lead to the discovery of admissible evidence and assumes facts not in evidence.

96. Notwithstanding, and without waiver of these objections, PPL Electric would be willing to answer the Interrogatory as limited in scope to the following: "Please describe the Company's policy and practices related to the protection of AMI data from unauthorized public disclosure."

**O. OBJECTIONS TO INTERROGATORY 20**

97. Complainant Set I, Interrogatory 20 requests the following:

20. PP&L has unlawfully taken away our freedom, peace of mind, independence and made us feel unsafe in our own home. With the Smart Meter spyware PP&L has put our safety and well being in jeopardy as PP&L put our family lives and privacy up for sale to the highest bidder only so PP&L could profit without any concerns for our safety or health. This is a direct violation to our Constitutional rights and other laws that prohibit the use of technology to spy unlawfully on a citizen without a Court Order. When did PP&L get a Court Order?

Please refer to numerous certified mail outlining our complaint and other issues related to this matter PP&L and their attorney have previously received.

98. The Company objected to Complainant Set I, Interrogatory 20 because it is vague, assumes facts not in evidence, and improperly seeks a legal opinion.

99. First, the interrogatory assumes facts not in evidence, including that the Company has “taken away” the Complainant’s family’s “freedom, peace of mind, independence,” has made them “feel unsafe,” and has installed “spyware” that “has put [the Complainant’s family’s] safety and well being in jeopardy as PP&L put [their] lives and privacy up for sale to the highest bidder only so PP&L could profit without any concerns for [their] safety or health.” None of these alleged facts is in the record.

100. Second, the interrogatory improperly seeks a legal opinion. The Company’s witnesses are not lawyers who can provide legal opinions. Further, discovery is intended for the discovery of facts and evidence that may be presented at the evidentiary hearing, not the legal opinions of the Company’s attorneys that are protected by attorney-client privilege and the attorney work product doctrine. Rather, PPL Electric’s legal arguments will be set forth in its closing argument and its briefs, if any, that are submitted in this proceeding.

101. Third, the interrogatory is vague as to what “spyware” means and generally references, rather than specifically identifying, “numerous certified mail” documents that were allegedly sent to PPL Electric and its attorneys. Without clarification as to these terms, PPL Electric cannot reasonably answer the interrogatory. PPL Electric notes that the Complainant fails to provide any clarification in the Motion to Compel.

102. For these reasons, the interrogatory is vague, assumes facts not in evidence, and improperly seeks a legal opinion.

103. Notwithstanding, and without waiver of these objections, PPL Electric will answer this Interrogatory in the interest of compromise and administrative efficiency.

**P. OBJECTIONS TO INTERROGATORY 21**

104. Complainant Set I, Interrogatory 21 requests the following:

21. PP&L is in violation of my Constitutional and Civil Rights and other laws by profiting not just once with the sale of electric to me, but two times or more by selling what they don't legally own by law. PP&L themselves did not produce the information generated within my home but is unlawfully taking information that belongs to me only in an attempt to sell it, what gives PP&L the right to take something from within my home and my property to sell it?

105. The Company objected to Complainant Set I, Interrogatory 21 because it is vague, assumes facts not in evidence, and improperly seeks a legal opinion.

106. First, the interrogatory assumes facts not in evidence, including that the Company is “profiting not just once with the sale of electric to [the Complainant], but two times or more by selling” information collected from the AMI meter. None of these alleged facts is in the record.

107. Second, the interrogatory improperly seeks a legal opinion. The Company’s witnesses are not lawyers who can provide legal opinions. Further, discovery is intended for the discovery of facts and evidence that may be presented at the evidentiary hearing, not the legal opinions of the Company’s attorneys that are protected by attorney-client privilege and the attorney work product doctrine. Rather, PPL Electric’s legal arguments will be set forth in its closing argument and its briefs, if any, that are submitted in this proceeding.

108. Third, the interrogatory is vague as to what “information” the Company is allegedly collecting through the AMI meter and selling to third parties. Without clarification as to this term, PPL Electric cannot reasonably answer the interrogatory. PPL Electric notes that the Complainant fails to provide any clarification in the Motion to Compel.

109. Based on the foregoing, the interrogatory is vague, assumes facts not in evidence, and improperly seeks a legal opinion.

110. Notwithstanding, and without waiver of these objections, PPL Electric will answer this Interrogatory in the interest of compromise and administrative efficiency.

**Q. OBJECTIONS TO INTERROGATORY 22**

111. Complainant Set I, Interrogatory 22 requests the following:

22. PP&L, without any compensation to me, uses their Smart Meter without my consent, to sells [sic] my information that lawfully belongs only to me and not at all to PP&L. So the question is: How can PP&L take a customer's private and confidential information and sell it without any further compensation to the individual who is the author and lawful owner to the literature or information PP&L is attempting to gather and sell?

112. The Company objected to Complainant Set I, Interrogatory 22 because it is vague, assumes facts not in evidence, and improperly seeks a legal opinion.

113. First, the interrogatory assumes facts not in evidence, including that the Company allegedly collects "literature or information" through the AMI meter and then sells the Complainant's "private and confidential information" to third parties without compensating the Complainant. None of these alleged facts is in the record.

114. Second, the interrogatory improperly seeks a legal opinion. The Company's witnesses are not lawyers who can provide legal opinions. Further, discovery is intended for the discovery of facts and evidence that may be presented at the evidentiary hearing, not the legal opinions of the Company's attorneys that are protected by attorney-client privilege and the attorney work product doctrine. Rather, PPL Electric's legal arguments will be set forth in its closing argument and its briefs, if any, that are submitted in this proceeding.

115. Third, the interrogatory is vague as to what "literature or information" the Company is allegedly collecting through the AMI meter and selling to third parties. Without

clarification as to these terms, PPL Electric cannot reasonably answer the interrogatory. PPL Electric notes that the Complainant fails to provide any clarification in the Motion to Compel.

116. Based on the foregoing, the interrogatory is vague, assumes facts not in evidence, and improperly seeks a legal opinion.

117. Notwithstanding, and without waiver of these objections, PPL Electric will answer this Interrogatory in the interest of compromise and administrative efficiency.

**R. OBJECTIONS TO INTERROGATORY 23**

118. Complainant Set I, Interrogatory 23 requests the following:

23. Does PP&L in some way supersede all of my Constitutional rights, such as the First, Fourth, & Fourteenth Amendments' as well as other Pennsylvania laws and Amendments assuring and guaranteeing my rights to privacy? Please refer to certified mail that you have received with other explanations regarding this issue and provide me with an answer?

b. PP&L and their attorney received Certified mail related to the violation of my rights. How does PP&L over ride my privacy rights and takes away my Constitutional rights to privacy?<sup>4</sup>

119. The Company objected to Complainant Set I, Interrogatory 23 because it is vague and improperly seeks a legal opinion.

120. First, the interrogatory improperly seeks a legal opinion. The Company's witnesses are not lawyers who can provide legal opinions. Further, discovery is intended for the discovery of facts and evidence that may be presented at the evidentiary hearing, not the legal opinions of the Company's attorneys that are protected by attorney-client privilege and the attorney work product doctrine. Rather, PPL Electric's legal arguments will be set forth in its closing argument and its briefs, if any, that are submitted in this proceeding.

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<sup>4</sup> PPL Electric notes that there is no subpart (a) to Interrogatory 23.

121. Second, the interrogatory is vague because it generally references, but does not specifically identify, “certified mail” documents that were allegedly sent to PPL Electric and its attorneys. Without clarification as to these documents, PPL Electric cannot reasonably answer the interrogatory. PPL Electric notes that the Complainant fails to provide any clarification in the Motion to Compel.

122. For these reasons, the interrogatory is vague and improperly seeks a legal opinion.

123. Notwithstanding, and without waiver of these objections, PPL Electric will answer this Interrogatory in the interest of compromise and administrative efficiency.

#### **S. OBJECTIONS TO INTERROGATORY 24**

124. Complainant Set I, Interrogatory 24 requests the following:

24. I don't have any confidence in PP&L safeguarding any information coming from my home. I maintain that it's my responsibility and right to say what goes out of my home and property and to whom. Not PP&L, PP&L is only looking to profit off of me. What safeguard is PP&L guaranteeing and what information would PP&L be limited to if they had my consent?

125. The Company objected to Complainant Set I, Interrogatory 24 because it is vague, is not reasonably calculated to lead to the discovery of admissible evidence, assumes facts not in evidence, and seeks highly confidential cybersecurity information.

126. First, the interrogatory assumes facts not in evidence, including that the Complainant does not “have any confidence in PP&L safeguarding any information” and that PPL Electric “is only looking to profit off of [the Complainant].” None of these alleged facts is in the record.

127. Second, the interrogatory is vague and not reasonably calculated to lead to the discovery of admissible evidence. The discovery request asks about the “safeguard” that the Company is “guaranteeing” and refers to some “consent” provided by the Complainant that

would purportedly limit the “information” collected by PPL Electric. Without clarification as to these terms, the Company cannot reasonably answer the interrogatory. PPL Electric notes that the Complainant fails to provide any clarification in the Motion to Compel.

128. Third, PPL Electric objected to the extent that the interrogatory seeks highly confidential cybersecurity information that should not be publicly disclosed, as disclosure of such information would necessarily place the Company’s systems at undue and unnecessary risk. Moreover, the Company has provided substantial information about its privacy and cybersecurity practices and protocols in the pre-served written testimony of Kevin Durkin (PPL Electric Statement No. 3) and Donald Vinciguerra (PPL Electric Statement No. 4) in accordance with the established litigation schedule. Disclosure of any further details about the Company’s cybersecurity practices may jeopardize the integrity and efficacy of PPL Electric’s cybersecurity plans and practices.

129. Based on the foregoing, the interrogatory is vague, is not reasonably calculated to lead to the discovery of admissible evidence, assumes facts not in evidence, and seeks highly confidential cybersecurity information.

130. Notwithstanding, and without waiver of these objections, PPL Electric will answer this Interrogatory in the interest of compromise and administrative efficiency.

**T. OBJECTIONS TO INTERROGATORY 25**

131. Complainant Set I, Interrogatory 25 requests the following:

25. Hacked! The Government, IRS, US Mail service, Military, and dozens more have been hacked. So what makes PP&L any safer?

a. Why should I think PP&L would do a better job in safeguarding my information when PP&L have all intentions of selling my information?

b. Once PP&L sells my information, will they wash their hands of it and not take any responsibility for how it is used?

c. Who is PP&L exchanging my private information with?

132. The Company objected to Complainant Set I, Interrogatory 25 because it is vague, is not reasonably calculated to lead to the discovery of admissible evidence, assumes facts not in evidence, and seeks highly confidential cybersecurity information.

133. First, the interrogatory assumes facts not in evidence, including that the “Government, IRS, US Mail service, Military, and dozens more have been hacked,” that the Company “sells” the Complainant’s “information” to third parties, and that the Company has “all intentions of selling [her] information.” None of these alleged facts is in the record.

134. Second, the interrogatory is vague and not reasonably calculated to lead to the discovery of admissible evidence. The discovery request asks about what the Company does to make the Company “safer” than these other entities. Further, the interrogatory asks about what entities the Company is “exchanging” information with; however, it is unclear whether that relates to the Complainant’s claim that the Company “sells” information or whether this refers to the Company simply providing the information without compensation. Moreover, the Complainant’s interrogatory generally refers to the “Government, IRS, US Mail service, Military, and dozens more” but utterly fails to provide any further specifics on the actual entities to which it is referring. Without clarification as to these terms, the Company cannot reasonably answer the interrogatory. PPL Electric notes that the Complainant fails to provide any clarification in the Motion to Compel.

135. Third, PPL Electric objected to the extent that the interrogatory seeks highly confidential cybersecurity information that should not be publicly disclosed, as disclosure of such information would necessarily place the Company’s systems at undue and unnecessary risk.

Moreover, the Company has provided substantial information about its privacy and cybersecurity practices and protocols in the pre-served written testimony of Kevin Durkin (PPL Electric Statement No. 3) and Donald Vinciguerra (PPL Electric Statement No. 4) in accordance with the established litigation schedule. Disclosure of any further details about the Company's cybersecurity practices may jeopardize the integrity and efficacy of PPL Electric's cybersecurity plans and practices.

136. For these reasons, the interrogatory is vague, is not reasonably calculated to lead to the discovery of admissible evidence, assumes facts not in evidence, and seeks highly confidential cybersecurity information.

137. Notwithstanding, and without waiver of these objections, PPL Electric will answer this Interrogatory in the interest of compromise and administrative efficiency.

**U. OBJECTIONS TO INTERROGATORY 25A<sup>5</sup>**

138. Complainant Set I, Interrogatory 25A requests the following:

25A. Is PP&L aware that there have been several class action law suits addressing violations of the privacy act and the complainants won their court actions? What would be the argument that PP&L would have?

139. The Company objected to Complainant Set I, Interrogatory 25A because it is vague, speculative, irrelevant, and not reasonably calculated to lead to the discovery of admissible evidence and assumes facts not in evidence.

140. First, the interrogatory assumes facts not in evidence, including that "there have been several class action law suits addressing violations of the privacy act and the complainants won their court actions." None of these alleged facts is in the record.

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<sup>5</sup> In Complainant Set I, there were two interrogatories numbered "25." Accordingly, the Company has renamed the second number "25" as "25A" to avoid confusion.

141. Second, the interrogatory is vague, speculative, irrelevant, and not reasonably calculated to lead to the discovery of admissible evidence. The discovery request is completely unclear as to what “privacy act” and “class action law suits” are being referenced. PPL Electric notes that the Complainant fails to provide any clarification in the Motion to Compel. Moreover, the issues in this formal complaint proceeding are limited to whether the Company is legally required to install the new AMI meter and whether such installation would violate Section 1501 of the Public Utility Code, 66 Pa. C.S. § 1501, which requires the Company to provide safe, reliable, and reasonable service to its customers. The Company’s argument in a speculative class action lawsuit about alleged “violations of the privacy act” under completely unknown and unspecified circumstances has nothing to do with the resolution of these issues.

142. Based on the foregoing, the interrogatory is vague, speculative, irrelevant, and not reasonably calculated to lead to the discovery of admissible evidence and assumes facts not in evidence.

143. Notwithstanding, and without waiver of these objections, PPL Electric would be willing to answer the Interrogatory as limited to the following: “Is PPL Electric aware of any class actions lawsuits involving the hacking of the AMI meters and RF Mesh system that the Company is currently deploying?”

#### **V. OBJECTIONS TO INTERROGATORY 26**

144. Complainant Set I, Interrogatory 26 requests the following:

26. Does PP&L have any open court cases at present to include class action suits? If so how many?

145. The Company objected to Complainant Set I, Interrogatory 26 because it is overly broad, irrelevant, and not reasonably calculated to lead to the discovery of admissible evidence and assumes facts not in evidence.

146. The discovery request asks the Company to provide the number of “any open court cases at present” that the Company has. However, the issues in this formal complaint proceeding are limited to whether the Company is legally required to install the new AMI meter and whether such installation would violate Section 1501 of the Public Utility Code, 66 Pa. C.S. § 1501, which requires the Company to provide safe, reliable, and reasonable service to its customers. The number of the Company’s “open court cases at present to include class action suits” has nothing to do with the resolution of these issues. Indeed, the interrogatory is not even limited to court cases involving the Company’s new AMI meters.

147. For these reasons, the interrogatory is overly broad, irrelevant, and not reasonably calculated to lead to the discovery of admissible evidence and assumes facts not in evidence.

148. Notwithstanding, and without waiver of these objections, PPL Electric would be willing to answer the Interrogatory as limited to the following: “Please provide the number of: (1) active PUC formal complaints that challenge the installation of PPL Electric’s new AMI meters; and (2) class action lawsuits that challenge the installation of PPL Electric’s new AMI meters.”

**W. OBJECTIONS TO INTERROGATORY 27**

149. Complainant Set I, Interrogatory 27 requests the following:

27. Supreme Court opinion notes (We) are fundamental, a free society and have other Constitutional Liberties and basic Civil Rights, to include the right to enjoy the peace of mind in the privacy of our home. Where does it say that PP&L has the right to interfere with any of my rights?

150. The Company objected to Complainant Set I, Interrogatory 27 because it improperly seeks a legal opinion.

151. The Company’s witnesses are not lawyers who can provide legal opinions. Further, discovery is intended for the discovery of facts and evidence that may be presented at

the evidentiary hearing, not the legal opinions of the Company's attorneys that are protected by attorney-client privilege and the attorney work product doctrine. Rather, PPL Electric's legal arguments will be set forth in its closing argument and its briefs, if any, that are submitted in this proceeding.

152. Based on the foregoing, the interrogatory improperly seeks a legal opinion.

153. Notwithstanding, and without waiver of these objections, PPL Electric will answer this Interrogatory in the interest of compromise and administrative efficiency.

**X. OBJECTIONS TO INTERROGATORY 28**

154. Complainant Set I, Interrogatory 28 requests the following:

28. In a Historic Supreme Court 9-0 decision on the Constitution Eight Amendment, it is cruel and unusual punishment as to deprivation of property without due process of law, this applies to all States. PP&L has made me and other family members victim's [sic] of unjust property seizure.

What right did PP&L have to seize anything from my property or home?

155. The Company objected to Complainant Set I, Interrogatory 28 because it assumes facts not in evidence and improperly seeks a legal opinion.

156. First, the interrogatory assumes facts not in evidence, particularly that the Company allegedly "has made [the Complainant] and other family members" the "victim[s] of unjust property seizure" and that PPL Electric has "seize[d]" something from the Complainant's property or home. None of these alleged facts is in the record.

157. Second, the discovery request improperly seeks a legal opinion. The Company's witnesses are not lawyers who can provide legal opinions. Further, discovery is intended for the discovery of facts and evidence that may be presented at the evidentiary hearing, not the legal opinions of the Company's attorneys that are protected by attorney-client privilege and the

attorney work product doctrine. Rather, PPL Electric's legal arguments will be set forth in its closing argument and its briefs, if any, that are submitted in this proceeding.

158. For these reasons, the interrogatory assumes facts not in evidence and improperly seeks a legal opinion.

159. Notwithstanding, and without waiver of these objections, PPL Electric will answer this Interrogatory in the interest of compromise and administrative efficiency.

**Y. OBJECTIONS TO INTERROGATORY 29**

160. Complainant Set I, Interrogatory 29 requests the following:

29. Top scientist in 40 countries signed a protection saying not to go ahead with the microwave technology that it is a danger, Smart Meters are harmful to humans. Why didn't PP&L give its customers any warning of the dangers?

161. The Company objected to Complainant Set I, Interrogatory 29 because it is vague, speculative, and not reasonably calculated to lead to the discovery of admissible evidence and assumes facts not in evidence.

162. First, the interrogatory assumes facts not in evidence, including that "[t]op scientist in 40 countries" allegedly "signed a protection saying not to go ahead with the microwave technology that it is a danger" and that "Smart Meters are harmful to humans." None of these alleged facts is in the record.

163. Second, the interrogatory is vague, speculative, and not reasonably calculated to lead to the discovery of admissible evidence. The discovery request uses the vague term "microwave technology" and speculates that it is a "danger" and "harmful to humans." Moreover, the interrogatory never specifically provides the name of this "protection" allegedly signed by scientists, nor does it even provide the names of some of these scientists. Additionally, the interrogatory generally refers to "Smart Meters" but fails to specify the precise

model type. Indeed, the request is not limited to the actual Landis + Gyr AMI meters that PPL Electric is deploying for its residential customers, including the Complainant. Specifically, the AMI meter that was installed on the Complainant's property is the Landis + Gyr E350 FOCUS AXR-SD meter. PPL Electric notes that the Complainant fails to provide any clarification in the Motion to Compel.

164. For these reasons, the interrogatory is vague, speculative, and not reasonably calculated to lead to the discovery of admissible evidence and assumes facts not in evidence.

165. Notwithstanding, and without waiver of these objections, PPL Electric will answer this Interrogatory in the interest of compromise and administrative efficiency.

**Z. OBJECTIONS TO INTERROGATORY 30**

166. Complainant Set I, Interrogatory 30 requests the following:

30. Please release to me all technical reports and studies done relating to any and all findings to include the Smart Meter radiation EMF's microwave effects on human health. PPL Electric Utilities Corporation gives the general public a watered down flyer that is dishonest and misleading. Who did PP&L pay for the study?

167. The Company objected to Complainant Set I, Interrogatory 30 because it is vague, overly broad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence as well as assumes facts not in evidence.

168. First, the interrogatory assumes facts not in evidence, including that the Company "gives the general public a watered down flyer that is dishonest and misleading." This alleged fact is not in the record.

169. Second, the interrogatory is vague, overly broad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence. The interrogatory generally refers to "Smart Meter" but fails to specify the precise model type. Indeed, the request is not limited to the actual Landis + Gyr AMI meters that PPL Electric is deploying for its

residential customers, including the Complainant. Specifically, the AMI meter that was installed on the Complainant's property is the Landis + Gyr E350 FOCUS AXR-SD meter. PPL Electric notes that the Complainant fails to provide any clarification in the Motion to Compel.

170. Moreover, the interrogatory improperly asks the Company to provide "all technical reports and studies one related to any and all findings to include the Smart Meter radiation EMF's [sic] microwave effects on human health." PPL Electric cannot be expected to produce hundreds and possibly thousands of studies related to the study of RF radiation and health. The Company only can be reasonably expected to identify those studies upon which its witnesses have relied in forming their opinions.

171. Based on the foregoing, the interrogatory is vague, overly broad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence as well as assumes facts not in evidence.

172. Notwithstanding, and without waiver of these objections, PPL Electric would be willing to answer the Interrogatory as limited to the following: "Please provide copies of the expert testimony and exhibits that the Company intends to present in this proceeding in support of its position that there is no reliable medical or scientific basis to conclude that the installation of the new AMI meter has caused, contributed to, or exacerbated adverse health effects or will cause, contribute to, or exacerbate adverse health effects, including references to the studies relied upon by the experts in forming their opinions."

**AA. OBJECTIONS TO INTERROGATORY 31**

173. Complainant Set I, Interrogatory 31 requests the following:

31. Was there another independent study done that PP&L is aware of?

a. If so who did the study and when?

b. Mr. Barrie Trower of the Royal Navy is a microwave expert lecturer around the world. Mr. Trower lectures on the dangers of microwave technologies, 5G, and Smart Meters and how they are harmful to humans. Mr. Trower states that in 3 generations only 1 in 8 children will be healthy. Is PP&L aware of Mr. Trower's expertise and what he is telling people around the world?

174. The Company objected to Complainant Set I, Interrogatory 31 because it is vague, is not reasonably calculated to lead to the discovery of admissible evidence, and assumes facts not in evidence.

175. First, the interrogatory assumes facts not in evidence, including all of the information about “Mr. Barrie Trower of the Royal Navy” and his alleged expertise and opinions. None of these alleged facts is in the record.

176. Second, the interrogatory is vague and not reasonably calculated to lead to the discovery of admissible evidence. The discovery request asks the Company about whether “another independent study” was performed; however, it never identifies the first “independent study” that was performed or even what that study concerned. Without this clarification, PPL Electric cannot reasonably be expected to answer the interrogatory. PPL Electric notes that the Complainant fails to provide any clarification in the Motion to Compel.

177. For these reasons, the interrogatory is vague, is not reasonably calculated to lead to the discovery of admissible evidence, and assumes facts not in evidence.

178. Notwithstanding, and without waiver of these objections, PPL Electric would be willing to answer the Interrogatory as limited to the following: “Aside from the expert testimony and exhibits provided in response to Interrogatory 31, has the Company engaged any other expert witnesses to testify on its behalf in this proceeding about whether or not there is a reliable medical or scientific basis to conclude that the installation of the new AMI meter has caused,

contributed to, or exacerbated adverse health effects or will cause, contribute to, or exacerbate adverse health effects? If so, please provide copies of their expert reports.”

**BB. OBJECTIONS TO INTERROGATORY 32**

179. Complainant Set I, Interrogatory 32 requests the following:

32. Is PP&L aware that facebook was fined 5 Billion dollars for violating their customers [sic] privacy rights?

180. The Company objected to Complainant Set I, Interrogatory 32 because it is irrelevant, is not reasonably calculated to lead to the discovery of admissible evidence, and assumes facts not in evidence.

181. First, the interrogatory assumes facts not in evidence, including that “facebook was fined 5 Billion dollars for violating their customers [sic] privacy rights.” This alleged fact is not in the record.

182. Second, the interrogatory is irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. The issues in this formal complaint proceeding are limited to whether the Company is legally required to install the new AMI meter and whether such installation would violate Section 1501 of the Public Utility Code, 66 Pa. C.S. § 1501, which requires the Company to provide safe, reliable, and reasonable service to its customers. Facebook’s treatment of customer data has nothing to do with resolving these issues.

183. Based on the foregoing, the interrogatory is irrelevant, is not reasonably calculated to lead to the discovery of admissible evidence, and assumes facts not in evidence.

184. Notwithstanding, and without waiver of these objections, PPL Electric will answer this Interrogatory in the interest of compromise and administrative efficiency.

## **CC. OBJECTIONS TO INTERROGATORY 33**

185. Complainant Set I, Interrogatory 33 requests the following:

33. Was PP&L aware that Appliance Companies have been sued in court and had to pay damages due to their violation of customer rights to privacy. Without consent the appliance companies spied to take confidential and private information from consumers?

186. The Company objected to Complainant Set I, Interrogatory 33 because it is vague, irrelevant, is not reasonably calculated to lead to the discovery of admissible evidence, and assumes facts not in evidence.

187. First, the interrogatory assumes facts not in evidence, including that “Appliance Companies have been sued in court and had to pay damages due to their violation of customer rights to privacy” and that “[w]ithout consent the appliance companies spied to take confidential and private information from consumers.” None of these alleged facts is not in the record.

188. Second, the interrogatory is irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. The issues in this formal complaint proceeding are limited to whether the Company is legally required to install the new AMI meter and whether such installation would violate Section 1501 of the Public Utility Code, 66 Pa. C.S. § 1501, which requires the Company to provide safe, reliable, and reasonable service to its customers. Unnamed “appliance companies” being sued in court and their treatment of customer data has nothing to do with resolving these issues.

189. Third, the interrogatory is vague because it never identifies the “appliance companies” to which it is referring. Without such information, it is completely unclear who these appliance companies are. PPL Electric notes that the Complainant fails to provide any clarification in the Motion to Compel.

190. For these reasons, the interrogatory is vague, irrelevant, is not reasonably calculated to lead to the discovery of admissible evidence, and assumes facts not in evidence.

191. Notwithstanding, and without waiver of these objections, PPL Electric will answer this Interrogatory in the interest of compromise and administrative efficiency.

**DD. OBJECTIONS TO INTERROGATORY 34**

192. Complainant Set I, Interrogatory 34 requests the following:

34. PP&L cannot take private and confidential information from my home and property with the intention of selling it without my consent. What puts PP&L above the law when they use electronic surveillance? Pennsylvania has laws against unlawful surveillance to include the use of drones. Therefore, explain why PP&L is an exception to that law?

a. PP&L demeans is if I have a cell or other items in my home they should be aware of them but refuse to allowing me the customer the full disclosure of all test studies that PP&L had done related to microwave technologies PP&L has the microwave studies now in their possession, not releasing that documentation is unfair and bias, Please provide all of the above studies and microwave documentations.

b. PP&L has an unfounded claim that Smart Meters are safe. As a customer I want to see the research report study and evidence or proof to substantiate the fact that the microwave technologies that PP&L is introducing into my home and onto my property are safe?

c. PP&L Smart Meter microwave technology should have a closer examination based on reports anyone can find on the internet, news papers, or TV. What is PP&L hiding that they are reluctant to release information about the PP&L Smart Meter study and the microwave technology?

d. PP&L and their attorney received numerous certified mail from me which will be considered part of this case without exception. PP&L attorneys did you make PP&L aware of all the information that you received and my request to have PP&L to reinstall the Analog Meter to end the disagreement?

e. Please provide the name of PP&L personnel that you relayed all of the information to and their position?

193. The Company objected to Complainant Set I, Interrogatory 34 because it is vague, assumes facts not in evidence, improperly seeks a legal opinion, and improperly seeks communications protected by attorney-client privilege.

194. First, the interrogatory assumes facts not in evidence, including that the Company takes “private and confidential information” and sells it to third parties without consent, that PPL Electric engages in “electronic surveillance,” that PPL Electric’s claim that the AMI meter is safe is “unfounded,” that “Smart Meter microwave technology should have a closer examination based on reports anyone can find on the internet, news papers, or TV,” and that the Company is “hiding” information about the safety of its AMI meters from the public. None of these alleged facts is not in the record.

195. Second, the interrogatory is vague because it uses the unclear terms, such as “electronic surveillance,” “microwave technologies,” “microwave studies,” and “microwave documentations.” Without further clarification as to what information the Complainant is seeking through this interrogatory, PPL Electric cannot reasonably be expected to answer. PPL Electric notes that the Complainant fails to provide any clarification in her Motion to Compel.

196. Third, subparts (d) and (e) of the interrogatory improperly seek details of communications protected by attorney-client privilege. Under Section 5.321(c) of the Commission’s regulations, the scope of discovery is limited to “any matter, not privileged, which is relevant to the subject matter involved in the pending action.” 52 Pa. Code § 5.321(c) (emphasis added). Similarly, Section 333(d) of the Public Utility Code states that “[a]ny party to a proceeding may serve written interrogatories upon any other party for purposes of discovering relevant, unprivileged information.” 66 Pa. C.S. § 333(d) (emphasis added). Here, the

Complainant is specifically requesting information about communications between the Company and its attorneys about issues raised in the instant legal matter. Such communications are protected by attorney-client privilege and not discoverable. *See* 42 Pa. C.S. § 5928 (“In a civil matter counsel shall not be competent or permitted to testify to confidential communications made to him by his client, nor shall the client be compelled to disclose the same, unless in either case this privilege is waived upon the trial by the client.”).

197. Fourth, the discovery request improperly seeks a legal opinion. The Company’s witnesses are not lawyers who can provide legal opinions. Further, discovery is intended for the discovery of facts and evidence that may be presented at the evidentiary hearing, not the legal opinions of the Company’s attorneys that are protected by attorney-client privilege and the attorney work product doctrine. Rather, PPL Electric’s legal arguments will be set forth in its closing argument and its briefs, if any, that are submitted in this proceeding.

198. For these reasons, the interrogatory is vague, assumes facts not in evidence, improperly seeks a legal opinion, and improperly seeks communications protected by attorney-client privilege.

199. Notwithstanding, and without waiver of these objections, PPL Electric will answer the main question and subparts (b) and (c) of this Interrogatory in the interest of compromise and administrative efficiency. Further, for subpart (a) of this Interrogatory PPL Electric would be willing to answer it as limited to the following: “Please provide copies of the expert testimony and exhibits that the Company intends to present in this proceeding in support of its position that there is no reliable medical or scientific basis to conclude that the installation of the new AMI meter has caused, contributed to, or exacerbated adverse health effects or will cause, contribute to, or exacerbate adverse health effects, including references to the studies

relied upon by the experts in forming their opinions.” Moreover, as part of this proposed compromise, PPL Electric will not answer subparts (d) and (e) because they clearly seek communications that are protected by attorney-client privilege.

**EE. OBJECTIONS TO INTERROGATORY 35**

200. Complainant Set I, Interrogatory 35 requests the following:

35. PP&L knows that EMF's frequencies emitted from the Smart Meters are harmful to humans. Why is PP&L attempting hide the facts and force it upon the general public that were not made aware of the Smart Meters danger or the surveillance capability built into the Smart Meter?

201. The Company objected to Complainant Set I, Interrogatory 35 because it is vague, speculative, and not reasonably calculated to lead to the discovery of admissible evidence and assumes facts not in evidence.

202. First, the interrogatory assumes facts not in evidence, including that the Company allegedly “knows that EMF's frequencies emitted from the Smart Meters are harmful to humans” and that PPL Electric allegedly is “attempting [to] hide the facts and force it upon the general public,” and that the AMI meters allegedly are a “danger” and have “surveillance capability.” None of these alleged facts is in the record.

203. Second, the interrogatory is vague, speculative, and not reasonably calculated to lead to the discovery of admissible evidence. The discovery request uses the vague term “surveillance capability” and speculates that the AMI meters are a “danger” to the public. Additionally, the interrogatory generally refers to “Smart Meters” but fails to specify the precise model type. Indeed, the request is not limited to the actual Landis + Gyr AMI meters that PPL Electric is deploying for its residential customers, including the Complainant. Specifically, the AMI meter that was installed on the Complainant’s property is the Landis + Gyr E350 FOCUS

AXR-SD meter. PPL Electric notes that the Complainant fails to provide any clarification in the Motion to Compel.

204. Based on the foregoing, the interrogatory is vague, speculative, and not reasonably calculated to lead to the discovery of admissible evidence and assumes facts not in evidence.

205. Notwithstanding, and without waiver of these objections, PPL Electric will answer this Interrogatory in the interest of compromise and administrative efficiency.

**FF. OBJECTIONS TO INTERROGATORY 36**

206. Complainant Set I, Interrogatory 36 requests the following:

36. Did PP&L tell its attorneys and the general public the whole truth about the many health problems that are associated with EMF radiation?

207. The Company objected to Complainant Set I, Interrogatory 36 because it is vague, assumes facts not in evidence, and improperly seeks communications protected by attorney-client privilege.

208. First, the interrogatory assumes facts not in evidence, including that “many health problems” are allegedly “associated with EMF radiation.” This alleged fact is not in the record.

209. Second, the interrogatory uses the vague term “health problems” and completely fails to provide details on what those specific “health problems” are. Without such clarification, PPL Electric cannot reasonably be expected to answer the interrogatory. PPL Electric notes that the Complainant fails to provide any clarification in the Motion to Compel.

210. Third, the interrogatory improperly seek details of communications protected by attorney-client privilege. Under Section 5.321(c) of the Commission’s regulations, the scope of discovery is limited to “any matter, not privileged, which is relevant to the subject matter involved in the pending action.” 52 Pa. Code § 5.321(c) (emphasis added). Similarly, Section

333(d) of the Public Utility Code states that “[a]ny party to a proceeding may serve written interrogatories upon any other party for purposes of discovering relevant, unprivileged information.” 66 Pa. C.S. § 333(d) (emphasis added). Here, the Complainant is specifically requesting information about communications between the Company and its attorneys about issues raised in the instant legal matter. Such communications are protected by attorney-client privilege and not discoverable. *See* 42 Pa. C.S. § 5928 (“In a civil matter counsel shall not be competent or permitted to testify to confidential communications made to him by his client, nor shall the client be compelled to disclose the same, unless in either case this privilege is waived upon the trial by the client.”).

211. For these reasons, the interrogatory is vague, assumes facts not in evidence, and improperly seeks communications protected by attorney-client privilege.

212. Notwithstanding, and without waiver of these objections, PPL Electric will answer this Interrogatory in the interest of compromise and administrative efficiency. However, PPL Electric will not provide any information about communications that are protected by attorney-client privilege.

**GG. OBJECTIONS TO INTERROGATORY 37**

213. Complainant Set I, Interrogatory 37 requests the following:

37. Is PP&L aware that all over our Country, the United States of America, and the around the world that people see the Smart Meters as harmful and don't want it on their property so why should I?

214. The Company objected to Complainant Set I, Interrogatory 37 because it is vague, speculative, irrelevant, and not reasonably calculated to lead to the discovery of admissible evidence and assumes facts not in evidence.

215. First, the interrogatory assumes facts not in evidence, including that “all over our Country, the United States of America, and the around the world that people see the Smart Meters as harmful and don’t want it on their property.” This alleged fact is not in the record.

216. Second, the interrogatory is vague, speculative, irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. The discovery request uses the vague term “harmful.” Additionally, the interrogatory generally refers to “Smart Meters” but fails to specify the precise model type. Indeed, the request is not limited to the actual Landis + Gyr AMI meters that PPL Electric is deploying for its residential customers, including the Complainant. Specifically, the AMI meter that was installed on the Complainant’s property is the Landis + Gyr E350 FOCUS AXR-SD meter. PPL Electric notes that the Complainant fails to provide any clarification in the Motion to Compel.

217. Moreover, the issues in this formal complaint proceeding are limited to whether the Company is legally required to install the new AMI meter and whether such installation would violate Section 1501 of the Public Utility Code, 66 Pa. C.S. § 1501, which requires the Company to provide safe, reliable, and reasonable service to its customers. The fact that other unnamed people may oppose the installation of the new AMI meters has nothing to do with the resolution of these issues.

218. Based on the foregoing, the interrogatory is vague, speculative, irrelevant, and not reasonably calculated to lead to the discovery of admissible evidence and assumes facts not in evidence.

219. Notwithstanding, and without waiver of these objections, PPL Electric will answer this Interrogatory in the interest of compromise and administrative efficiency.

## HH. OBJECTIONS TO INTERROGATORY 38

220. Complainant Set I, Interrogatory 38 requests the following:

38. PP&L Smart Meters are operating their microwave technology EMF's over my copper wiring throughout my home without prior permission or consent. When did I tell PP&L that they can use my house wiring for surveillance upon me?

a. What legal grounds did PP&L have to install microwave technology that was operating throughout my home and off of my homes copper wiring without permission?

b. In the past I purchased clean electricity from PP&L with the understanding that the purchase was to be without any other compensation to PP&L or that they can use my home and property for additional money. What right did PP&L have to change the initial agreement?

c. PP&L is now providing me with unsafe microwave EMF's and dirty electric on my property and making an additional profit off of me. How is that legal?

d. PP&L has always maintained that they were responsible up to the electric utility pole and Meter utility box (only).

PP&L has always maintained that from the pole on PP&L had no jurisdiction whatsoever to make any repairs. PP&L always maintained that from the pole on it was the home owner's responsibility not PP&L's. PP&L for as long as I can remember has always recognized that my home and wiring was out of their control and they had no authority whatsoever after the pole and meter. I want to know how that changed and now PP&L, without consent, can take it upon themselves to now insist that they have a right to use my home or property for their convenience and profit off of it without compensation to the homeowner?

e. I never intended for our home wiring to be used by PP&L for search, seizure or surveillance of my personal information. PP&L never paid for the wiring, its installation nor has PP&L ever maintained any electric component in my home to include the breaker box. Please explain how PP&L can illegally make a seizure of my personal property and to profit from it by just putting in an unsafe Smart Meter on my property as if they own the

property, house and the components in it? What happen to our rights?

f. I had recently replaced circuit breakers, wiring and other electrical components in my home. Since PP&L is making claim to the copper wiring, etc., is PP&L going to compensate me for any upgrade or repairs since PP&L is using the components?

221. The Company objected to Complainant Set I, Interrogatory 38 because it is vague, speculative, irrelevant, and not reasonably calculated to lead to the discovery of admissible evidence as well as assumes facts not in evidence and improperly seeks a legal opinion.

222. First, the interrogatory assumes facts not in evidence, including that PPL Electric's AMI meters are allegedly "operating their microwave technology EMF's over [the Complainant's] copper wiring throughout [her] home," that the Company allegedly uses the Complainant's "house wiring for surveillance," that the Company is now using the Complainant's hoe and property for additional money," that PPL Electric allegedly "is now providing [the Complainant] with unsafe microwave EMF's and dirty electric on [the Complainant's] property and making an additional profit off of [her]," and that the AMI meter is producing "unsafe microwave EMF's [sic] and dirty electric[ity]." Moreover, the interrogatory claims that PPL Electric is seizing the Complainant's personal property and conducted surveillance. The request also includes averments about the installation and replacement of wireless and other electrical equipment in the Complainant's home. None of these alleged facts is in the record.

223. Second, the interrogatory is vague, speculative, irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. The interrogatory never specifies how the Company is "making claim" to the Complainant's "copper wiring" and speculates that the AMI meter produces "unsafe" levels of RF fields. Additionally, the interrogatory generally

refers to “Smart Meters” but fails to specify the precise model type. Indeed, the request is not limited to the actual Landis + Gyr AMI meters that PPL Electric is deploying for its residential customers, including the Complainant. Specifically, the AMI meter that was installed on the Complainant’s property is the Landis + Gyr E350 FOCUS AXR-SD meter. PPL Electric notes that the Complainant fails to provide any clarification in her Motion to Compel.

224. Moreover, the issues in this formal complaint proceeding are limited to whether the Company is legally required to install the new AMI meter and whether such installation would violate Section 1501 of the Public Utility Code, 66 Pa. C.S. § 1501, which requires the Company to provide safe, reliable, and reasonable service to its customers. The Complainant’s inquiry as to the Company’s willingness to compensate the Complainant “for any upgrade or repairs” is completely irrelevant to resolving these issues.

225. Third, subparts (a) through (e) improperly seek a legal opinion. The Company’s witnesses are not lawyers who can provide legal opinions. Further, discovery is intended for the discovery of facts and evidence that may be presented at the evidentiary hearing, not the legal opinions of the Company’s attorneys that are protected by attorney-client privilege and the attorney work product doctrine. Rather, PPL Electric’s legal arguments will be set forth in its closing argument and its briefs, if any, that are submitted in this proceeding.

226. For these reasons, the interrogatory is vague, speculative, irrelevant, and not reasonably calculated to lead to the discovery of admissible evidence as well as assumes facts not in evidence and improperly seeks a legal opinion.

227. Notwithstanding, and without waiver of these objections, PPL Electric will answer this Interrogatory in the interest of compromise and administrative efficiency.

## II. OBJECTIONS TO INTERROGATORY 39

228. Complainant Set I, Interrogatory 39 requests the following:

39. PP&L has been Fraudulent in how they marketed their Smart Meter and misled the public into thinking that the Smart Meters were safe. Customers weren't made aware that the Smart Meters would gather information from their homes and that a profile of each household could be made and give it to whoever PP&L wish. Why weren't Pennsylvania customers made aware of the larger scope of the operation that PP&L is engaging in?

a. Please provide me with a copy of all literature that PP&L has provided to the public informing them of how PP&L would be using the customer's home wiring or other components that belongs the property owner?

b. When PP&L sells information that they gather from the customer's home what input or say does a customer have to their private information or how it is to be distributed?

c. Will the information be sold to foreign countries or overseas buyers?

229. The Company objected to Complainant Set I, Interrogatory 39 because it is vague, overly broad, unduly burdensome, irrelevant, and not reasonably calculated to lead to the discovery of admissible evidence as well as assumes facts not in evidence.

230. First, the interrogatory assumes facts not in evidence, including that PPL Electric allegedly "has been Fraudulent" in its marketing of the AMI meters and "misled the public into thinking that the Smart Meters were safe," that the Company allegedly will "gather information from [customers'] homes," that the Company allegedly could create "a profile of each household" and distribute it to whomever PPL Electric wants, and that PPL Electric allegedly sells customer's information collected through the AMI meter to third parties. None of these alleged facts is in the record.

231. Second, the interrogatory is vague, speculative, irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. The interrogatory never specifies

how the Company is “using the customer’s home wiring or other components.” Further, the scope of the instant Complaint is limited to the deployment of the new AMI meter on the Complainant’s property. The Complainant does not have standing to represent the interests of every other PPL Electric customer. Moreover, in subpart (c), the interrogatory never specifies what “information” is allegedly may be “sold to foreign countries or overseas buyers.” Additionally, the interrogatory generally refers to “Smart Meters” but fails to specify the precise model type. Indeed, the request is not limited to the actual Landis + Gyr AMI meters that PPL Electric is deploying for its residential customers, including the Complainant. Specifically, the AMI meter that was installed on the Complainant’s property is the Landis + Gyr E350 FOCUS AXR-SD meter. PPL Electric notes that the Complainant fails to provide any clarification in the Motion to Compel.

232. In addition, the issues in this formal complaint proceeding are limited to whether the Company is legally required to install the new AMI meter and whether such installation would violate Section 1501 of the Public Utility Code, 66 Pa. C.S. § 1501, which requires the Company to provide safe, reliable, and reasonable service to its customers. Therefore, it is completely irrelevant for the Complainant to request the Company’s “literature” about any ways in which the Company may “be using the customer’s home wiring or other components” because such documents are completely unrelated to the AMI meters. Also, subpart (a) has no limitation in temporal scope, so the Company would have to review all of its documentation since the inception of the Company to see if it is responsive to this request for “literature.”

233. Based on the foregoing, the interrogatory is vague, overly broad, unduly burdensome, irrelevant, and not reasonably calculated to lead to the discovery of admissible evidence as well as assumes facts not in evidence.

234. Notwithstanding, and without waiver of these objections, PPL Electric will answer this Interrogatory in the interest of compromise and administrative efficiency.

**JJ. OBJECTIONS TO INTERROGATORY 40**

235. Complainant Set I, Interrogatory 40 requests the following:

40. When was PP&L or any company, corporation, or state government granted the right to violate my Constitutional rights and requirements under the law of due process and protection of my fundamental rights to freedom and privacy under the law?

236. The Company objected to Complainant Set I, Interrogatory 40 because it is irrelevant, is not reasonably calculated to lead to the discovery of admissible evidence, and improperly seeks a legal opinion.

237. First, the interrogatory is irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. The issues in this formal complaint proceeding are limited to whether the Company is legally required to install the new AMI meter and whether such installation would violate Section 1501 of the Public Utility Code, 66 Pa. C.S. § 1501, which requires the Company to provide safe, reliable, and reasonable service to its customers. Therefore, it is completely irrelevant for the Complainant to request information about any other company, any other corporation, or any state government.

238. Second, the interrogatory improperly seeks a legal opinion. The Company's witnesses are not lawyers who can provide legal opinions. Further, discovery is intended for the discovery of facts and evidence that may be presented at the evidentiary hearing, not the legal opinions of the Company's attorneys that are protected by attorney-client privilege and the attorney work product doctrine. Rather, PPL Electric's legal arguments will be set forth in its closing argument and its briefs, if any, that are submitted in this proceeding.

239. For these reasons, the interrogatory is irrelevant, is not reasonably calculated to lead to the discovery of admissible evidence, and improperly seeks a legal opinion.

240. Notwithstanding, and without waiver of these objections, PPL Electric will answer this Interrogatory in the interest of compromise and administrative efficiency.

**KK. OBJECTIONS TO INTERROGATORY 41**

241. Complainant Set I, Interrogatory 41 requests the following:

41. I believe that PP&L Smart Meter microwave technology is a danger to me and my families' [sic] health. Smart Meter danger has been recognize [sic] both in this county and around world as being an especially dangerous and harmful device. PP&L Smart Meter also has spyware or surveillance technology built in it that has no other definition other then [sic] an invasion of our privacy and liberties. PP&L has taken away information from within my home and off of my property that they have no legal right to. The question is under what judicial or administration of the law does PP&L have to bypass my constitutional rights?

a. Supply all documentation showing me how PP&L can take control of my property and disregard my Constitutional rights and other legal rights so they could install a Smart Meter?

242. The Company objected to Complainant Set I, Interrogatory 41 because it is vague, speculative, overly broad, and unduly burdensome as well as assumes facts not in evidence and improperly seeks a legal opinion.

243. First, the interrogatory assumes facts not in evidence, including that the new AMI meter's "microwave technology is a danger," that "Smart Meter danger has been recognize[d] both in this country and around [the] world," that the new AMI meter "has spyware or surveillance technology built in," and that PPL Electric has allegedly taken the Complainant's information without authorization. None of these alleged facts is in the record.

244. Second, the interrogatory is vague and speculative. The discovery request uses the vague terms "microwave technology," "spyware," and "surveillance technology" and

speculates that the AMI meters are “dangerous and harmful device[s].” Additionally, the interrogatory generally refers to “Smart Meter” but fails to specify the precise model type. Indeed, the request is not limited to the actual Landis + Gyr AMI meters that PPL Electric is deploying for its residential customers, including the Complainant. Specifically, the AMI meter that was installed on the Complainant’s property is the Landis + Gyr E350 FOCUS AXR-SD meter. PPL Electric notes that the Complainant fails to provide any clarification in the Motion to Compel.

245. Third, subpart (a) of the interrogatory is overly broad and unduly burdensome because it asks the Company to “[s]upply all documentation showing [the Complainant] how PP&L can take control of [her] property.” Even if this allegation about PPL Electric taking control of the Complainant’s property were true, which it is not, PPL Electric cannot reasonably be expected to produce “all documentation” in existence relating to that position. Rather, the Company only can be reasonably expected to produce the documentation upon which it relied in support of its position.

246. Fourth, the interrogatory improperly seeks a legal opinion. The Company’s witnesses are not lawyers who can provide legal opinions. Further, discovery is intended for the discovery of facts and evidence that may be presented at the evidentiary hearing, not the legal opinions of the Company’s attorneys that are protected by attorney-client privilege and the attorney work product doctrine. Rather, PPL Electric’s legal arguments will be set forth in its closing argument and its briefs, if any, that are submitted in this proceeding.

247. Based on the foregoing, the interrogatory is vague, speculative, overly broad, and unduly burdensome as well as assumes facts not in evidence and improperly seeks a legal opinion.

248. Notwithstanding, and without waiver of these objections, PPL Electric will answer this Interrogatory in the interest of compromise and administrative efficiency.

**LL. OBJECTIONS TO INTERROGATORY 42**

249. Complainant Set I, Interrogatory 42 requests the following:

42. Initially there was an opt-out from the Smart Meter for Pennsylvania customers. Please provide information clarifying how the opt-out option was terminated and the mandatory installation of the Smart Meter was instituted?

250. The Company objected to Complainant Set I, Interrogatory 42 because it assumes facts not in evidence and improperly seeks a legal opinion.

251. First, the interrogatory assumes facts not in evidence, namely that “[i]nitially there was an opt-out from the Smart Meter for Pennsylvania customers.” However, this alleged fact is not in the record.

252. Second, the interrogatory improperly seeks a legal opinion. The Company’s witnesses are not lawyers who can provide legal opinions. Further, discovery is intended for the discovery of facts and evidence that may be presented at the evidentiary hearing, not the legal opinions of the Company’s attorneys that are protected by attorney-client privilege and the attorney work product doctrine. Rather, PPL Electric’s legal arguments will be set forth in its closing argument and its briefs, if any, that are submitted in this proceeding.

253. For these reasons, the interrogatory assumes facts not in evidence and improperly seeks a legal opinion.

254. Notwithstanding, and without waiver of these objections, PPL Electric will answer this Interrogatory in the interest of compromise and administrative efficiency.

**MM. OBJECTIONS TO INTERROGATORY 43**

255. Complainant Set I, Interrogatory 43 requests the following:

43. PP&L has failed to provide me and other Pennsylvania customers with a clear and full explanation of what radiation damage and harm to ones [sic] health could be caused by their Smart Meter. Other electrical components sold on the open market give a clear warning of any danger that their equipment such as laptop computers, cell phones, wifi equipment, microwaves and any other device that use EMF technology should be used with caution. PP&L is well aware that the above mentioned equipment can be turned off on demand unlike PP&L's Smart Meter. PP&L's Smart Meter is in operation mode 24 hours a day, 7 days a week, 365 days a year which makes PP&L's Smart Meter more dangerous considering there is no way or device to terminate the Smart Meter's microwave EMF technology that is continuously going throughout our home. Why hasn't PP&L provided all Pennsylvania customers with the fact that there could be a danger related with the PP&L Smart Meter?

PP&L and their Attorney have received certified mail related to this fact. Please review the certified mail that you received.

256. The Company objected to Complainant Set I, Interrogatory 43 because it is vague, speculative, overly broad, irrelevant, and not reasonably calculated to lead to the discovery of admissible evidence as well as assumes facts not in evidence.

257. First, the interrogatory assumes facts not in evidence, including that the new AMI meter can cause "radiation damage and harm to ones [sic] health," that "[o]ther electrical components sold on the open market give a clear warning of any danger that their equipment such as laptop computers, cell phones, wifi equipment, microwaves and any other device that use EMF technology should be used with caution," and that PPL Electric's AMI meter "is in operation mode 24 hours a day, 7 days a week, 365 days a year" and makes it "more dangerous." None of these alleged facts is in the record.

258. Second, the interrogatory is vague and speculative. The discovery request speculates that the AMI meters cause unspecified "radiation damage" and "harm" and, therefore,

are “danger.” Additionally, the interrogatory generally refers to “Smart Meter” but fails to specify the precise model type. Indeed, the request is not limited to the actual Landis + Gyr AMI meters that PPL Electric is deploying for its residential customers, including the Complainant. Specifically, the AMI meter that was installed on the Complainant’s property is the Landis + Gyr E350 FOCUS AXR-SD meter. PPL Electric notes that the Complainant fails to provide any clarification in the Motion to Compel.

259. Third, the interrogatory is overly broad, irrelevant, and not reasonably calculated to lead to the discovery of admissible evidence because it seeks details about the information provided to “other Pennsylvania customers.” The scope of the instant Complaint is limited to the deployment of the new AMI meter on the Complainant’s property. The Complainant does not have standing to represent the interests of every other PPL Electric customer.

260. Based on the foregoing, the interrogatory is vague, speculative, overly broad, irrelevant, and not reasonably calculated to lead to the discovery of admissible evidence as well as assumes facts not in evidence.

261. Notwithstanding, and without waiver of these objections, PPL Electric will answer this Interrogatory in the interest of compromise and administrative efficiency.

**NN. OBJECTIONS TO INTERROGATORY 44**

262. Complainant Set I, Interrogatory 44 requests the following:

44. It is further my understanding that the Smart Meter lacks a safety device to prevent an overload or short in the meter that could cause an electrical fire. The fact that the Smart Meter can cause fires is well documented. The question is why PP&L has been so reluctant to make all the facts concerning the Smart Meters danger public and a warning provided?

263. The Company objected to Complainant Set I, Interrogatory 44 because it is vague, is speculative, and assumes facts not in evidence.

264. First, the interrogatory assumes facts not in evidence, including that the new AMI meter “lacks safety device to prevent an overload or short in the meter that could cause an electrical fire,” that the AMI meter “can cause fires,” and that the AMI meters are a “danger” to the public. None of these alleged facts is in the record.

265. Second, the interrogatory is vague and speculative. The discovery request claims that the AMI meters cause unspecified “fires,” “overload[s],” or “short[s]” in unspecified situations and, as a result, speculates the AMI meter is a “danger.” Additionally, the interrogatory generally refers to “Smart Meter” but fails to specify the precise model type. Indeed, the request is not limited to the actual Landis + Gyr AMI meters that PPL Electric is deploying for its residential customers, including the Complainant. Specifically, the AMI meter that was installed on the Complainant’s property is the Landis + Gyr E350 FOCUS AXR-SD meter. PPL Electric notes that the Complainant fails to provide any clarification in the Motion to Compel.


266. For these reasons, the interrogatory is vague, is speculative, and assumes facts not in evidence.

267. Notwithstanding, and without waiver of these objections, PPL Electric will answer this Interrogatory in the interest of compromise and administrative efficiency.

**III. CONCLUSION**

For the reasons set forth above, PPL Electric Utilities Corporation respectfully requests that Administrative Law Judge Elizabeth H. Barnes deny Dana Brennan's Motion to Dismiss Objections and Compel Answers to Interrogatories, as set forth above.

Respectfully submitted,



Kimberly A. Klock (ID # 89716)  
Michael J. Shafer (ID # 205681)  
PPL Services Corporation  
Two North Ninth Street  
Allentown, PA 18101  
Phone: 610-774-2599  
Fax: 610-774-4102  
E-mail: [kklock@pplweb.com](mailto:kklock@pplweb.com)  
[mjshafer@pplweb.com](mailto:mjshafer@pplweb.com)

Devin T. Ryan (ID # 316602)  
Garrett P. Lent (ID # 321566)  
Post & Schell, P.C.  
17 North Second Street, 12th Floor  
Harrisburg, PA 17101-1601  
Phone: 717-731-1970  
Fax: 717-731-1985  
E-mail: [dryan@postschell.com](mailto:dryan@postschell.com)  
[glent@postschell.com](mailto:glent@postschell.com)

Curtis S. Renner (ID # 326488)  
Watson & Renner  
1901 Pennsylvania Avenue, NW  
Suite 1005 - ENS  
Washington, DC 20006  
Phone: 202-737-6302  
E-mail: [crenner@w-r.com](mailto:crenner@w-r.com)

Date: August 20, 2019

Attorneys for PPL Electric Utilities Corporation

# APPENDIX “A”

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

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

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INTERROGATORIES AND REQUESTS FOR PRODUCTION  
OF DOCUMENTS PROPOUNDED BY DANA BRENNAN  
ON PPL ELECTRIC UTILITIES CORPORATION

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Pursuant to 66 Pa.C.S. 333 and 52 Pa. Code 5.341, Dana Brennan propounds the following Interrogatories and Requests for Production of Documents on PPL Electric Utilities Corporation (“ Respondent”)

Definitions:

1. PP&L means PPL Electric Utilities Corporation.
2. EMF means Electro Magnetic Frequency
3. USA means United States of America.
4. Smart Meter means Microwave technology emitting radiation
5. Spyware means surveillance technology employed from Smart Meters

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6. Trespassing means unauthorized PPL Electric Utilities Corporation on your property

7. Documentation means to supply everything requested

8. Constitutional rights means laws to protect people to assure we have rules and regulations governing what is right and not interfered with

9. Wire tapping means the unlawful means to collect information without authorization

10. Northern California means the death of 85 people related to GP&E Electric Utilities Corporation and their bankruptcy

11. Mr. Barrie Trower means Royal Navy microwave expert who lectures around the world of the dangers of microwave technology from Smart Meters

12. Facebook means lawsuit for billions of dollars for the release of personal information of their customers

13. Vizio Corporation means loss of class action suit for surveillance and invasion of privacy

14. Supreme Court means recognition of fundamental rights mentioned in the Constitution that is an inherent part of liberty including privacy rights

15. Historic Supreme Court 9-0 decision means no one can take away anyone's Constitutional rights

16. Hacked means the Smart Meter technology makes it easier for unauthorized personnel like PP&L or thieves to illegally collect information and manipulate other wifi technology in the home to commit theft, etc.

17. Under the right to know means studies, documentation, and literature of Smart Meter radiation technology findings to be released

18. Opt-out means the desire to end dangerous Smart Meter technology, microwaves and radiation to be replaced with the original Analog Meter

19. Compulsory control means forced upon customers without their consent

20. Profiling means collecting information from a household illegally to put together a record of how an individual family conducts its life to include habits, likes and dislikes that could be sold on the open market to the highest bidder

Page 3.

21. Court Order means when authorized personnel such as the FBI, CIA, Police or other law enforcement can prove to have good cause to search an individual's home with a search warrant

22. Notice of no consent to trespass, surveillance and radiation pollution and fire hazard notice of liability, adhesion contract means:

PP&L is put on notice relating to whatever health problems should arise due to the Smart Meter and its microwave radiation technology. They will also be held responsible for collecting information from my household along with any problems listed in the notice as well but not limiting PP&L's responsibility for issues that the Smart Meter may cause in the future.

PP&L and Attorney Ryan, if there is anything that is not self explanatory please feel free to ask. PP&L and Attorney Ryan the answers to the Interrogatories and requests for production of documents were not late. The documents you are referring to were sent by certified mail within 13 business days.

#### INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS PROPOUNDED ON PPL ELECTRIC UTILITIES

Complainant to PP&L

1. What consent did PP&L receive from Dana Brennan, the property owner, to install the Smart Meter?
2. What is the date PP&L received consent to install a Smart Meter at 16 Oslo Way Newfoundland, PA 18445?
3. PP&L Smart Meter installer was told personally not to install the Smart Meter and left. Then on a later date came back onto the property by trespassing and installed the Smart Meter without any consent or notice to the property owner. By what right does PP&L have to put microwave technology or spy ware on any ones property without consent?
4. PP&L was informed by phone and certified mail to remove the dangerous Smart Meter due to it being unsafe and threatening to our family's health as outlined in all the letters received by PP&L and their attorneys. Why then at this late date has the Smart Meter not been removed? Refer to all the certified mail and their contents explaining my rejection to the Smart Meter and add the entire contents as argument.
5. Northern California lost 90% of their population due to GP&E Electric Utilities Corporation fires caused by Smart Meters. Many people had to relocate and 85 people were killed as a result of the fires. GP&E now filed for bankruptcy citing over \$30

Page 4.

Billion in claims. What insurance does PP&L Electric Utilities give my family if there is a fire or my family becomes sick from the EMF' radiation transmitted from the Smart Meter?

6. What insurance company is PP&L insured with?

7. Did PP&L purchase the Smart Meter from China?

8. Was the Smart Meter made in China?

9. PP&L will not let me opt-out from the Smart Meter as other states and Electric Utilities corporations do. Why not?

10. PP&L is using the Smart Meter to gather information from my home and off of my property to sell to a third party without consent. What right does PP&L have to take any information I didn't consent to?

11. PP&L is engaging in wire tapping without a Court Order. Under what law does PP&L have the right to violate my Constitutional rights to privacy and other laws as stated in the number of certified mail sent to both PP&L and their attorneys?

12. Over the years PP&L received payments from me in the form of money for their service without any other demand or additional conditions or compensation. Why is PP&L now demanding more in return for electric service provided through the Smart Meter when we initially objected to the installation and made it clear we wanted to keep an Analog meter?

#### UNDER THE RIGHT TO KNOW LAW

13. PP&L will sell any information they unlawfully gathered from me, how much money will PP&L make from me and all the other PP&L customers on a yearly basis? Please enter cash Amount \_\_\_\_\_.

14. Provide the number of people that requested to opt-out from the PP&L Smart Meter to date? Amount \_\_\_\_\_.

15. To date: Give the number of PP&L customers who have requested to opt-out of the Smart Meter due to fear of health problems caused by PP&L's Smart Meter dangerous radiation levels. Please include customers that don't want PP&L spyware or surveillance of their private information. Amount \_\_\_\_\_.

a. Pennsylvania customers are forced to call an out of state representative when attempting to make a complaint or request to opt-out from the Smart Meter. PP&L is

Page 5.

purposely re-routing Pennsylvania customers making it extremely inconvenient to place a complaint so that the customers are discouraged from making a complaint. Give a full disclosure of out of state phone calls as well as letters from PP&L customers requesting to opt-out of the Smart Meter?

b. Who schooled the out of state PP&L representatives who receive complaints and concerns from customers in Pennsylvania concerning PP&L installing Smart Meters on their homes and properties after being instructed not to trespass or install a Smart Meter?

c. It is PP&L's common practice to tell customers that if they don't want the Smart Meters PP&L will discontinue their electrical service entirely. When did PP&L start a compulsory control over the Pennsylvania people with the Smart Meter?

d. Please provide all the names of PP&L personal and board members with the authority to demand change over my state law regulations and Constitutional rights?

16. PP&L was aware that the Smart Meter that they forced on me and other customers has many health risks. Why didn't PP&L give me and other customer's realistic facts and notice of the health risks that come with the Smart Meter?

17. What right does PP&L have to know what electric appliances that I have or the make of the appliance?

18. What right does PP&L have to invade our privacy through the Smart Meter by profiling my family and I by knowing when we get up in the morning, leave the house, go from room to room, come home, go to bed, or what we may be viewing on TV?

NOTE: Vizio TV company recently lost a class action law suit for using their Smart TV's to surveillance customers as PP&L is attempting to do to us with the Smart Meter.

a. Other PP&L customers and I have experienced electrical equipment such as a TV turning itself off without any explanation other than the recent Smart Meter installation. What right does PP&L have to determine when a customer's use of electric should be terminated other than non-payment of a bill?

19. PP&L has made it easier for my home to be hacked into with the Smart Meter. So the question is: If the privacy of our home is hacked into and our personal information is stolen with other items, how will PP&L compensate us for making us and our home more vulnerable?

20. PP&L has unlawfully taken away our freedom, peace of mind, independence and made us feel unsafe in our own home. With the Smart Meter spyware PP&L has put our safety and well being in jeopardy as PP&L put our family lives and privacy up for sale to the highest bidder only so PP&L could profit without any concerns for our safety or

Page 6.

health. This is a direct violation to our Constitutional rights and other laws that prohibit the use of technology to spy unlawfully on a citizen without a Court Order. When did PP&L get a Court Order?

Please refer to numerous certified mail outlining our complaint and other issues related to this matter PP&L and their attorney have previously received.

21. PP&L is in violation of my Constitutional and Civil Rights and other laws by profiting not just once with the sale of electric to me, but two times or more by selling what they don't legally own by law. PP&L themselves did not produce the information generated within my home but is unlawfully taking information that belongs to me only in an attempt to sell it, what gives PP&L the right to take something from within my home and my property to sell it?

22. PP&L, without any compensation to me, uses their Smart Meter without my consent, to sells my information that lawfully belongs only to me and not at all to PP&L. So the question is: How can PP&L take a customer's private and confidential information and sell it without any further compensation to the individual who is the author and lawful owner to the literature or information PP&L is attempting to gather and sell?

23. Does PP&L in some way supersede all of my Constitutional rights, such as the First, Fourth, & Fourteenth Amendments' as well as other Pennsylvania laws and Amendments assuring and guaranteeing my rights to privacy? Please refer to certified mail that you have received with other explanations regarding this issue and provide me with an answer?

b. PP&L and their attorney received Certified mail related to the violation of my rights. How does PP&L over ride my privacy rights and takes away my Constitutional rights to privacy?

24. I don't have any confidence in PP&L safeguarding any information coming from my home. I maintain that it's my responsibility and right to say what goes out of my home and property and to whom. Not PP&L, PP&L is only looking to profit off of me. What safeguard is PP&L guaranteeing and what information would PP&L be limited to if they had my consent?

25. Hacked! The Government, IRS, US Mail service, Military, and dozens more have been hacked. So what makes PP&L any safer?

a. Why should I think PP&L would do a better job in safeguarding my information when PP&L have all intentions of selling my information?

b. Once PP&L sells my information, will they wash their hands of it and not take any responsibility for how it is used?

Page 7.

c. Who is PP&L exchanging my private information with?

25. Is PP&L aware that there have been several class action law suits addressing violations of the privacy act and the complainants won their court actions? What would be the argument that PP&L would have?

26. Does PP&L have any open court cases at present to include class action suits? If so how many?

27. Supreme Court opinion notes (We) are fundamental, a free society and have other Constitutional Liberties and basic Civil Rights, to include the right to enjoy the peace of mind in the privacy of our home. Where does it say that PP&L has the right to interfere with any of my rights?

28. In a Historic Supreme Court 9-0 decision on the Constitution Eight Amendment, it is cruel and unusual punishment as to deprivation of property without due process of law, this applies to all States. PP&L has made me and other family members victim's of unjust property seizure.

What right did PP&L have to seize anything from my property or home?

29. Top scientist in 40 countries signed a protection saying not to go ahead with the microwave technology that it is a danger, Smart Meters are harmful to humans. Why didn't PP&L give its customers any warning of the dangers?

30. Please release to me all technical reports and studies done relating to any and all findings to include the Smart Meter radiation EMF's microwave effects on human health. PPL Electric Utilities Corporation gives the general public a watered down flyer that is dishonest and misleading. Who did PP&L pay for the study?

31. Was there another independent study done that PP&L is aware of?

a. If so who did the study and when?

b. Mr. Barrie Trower of the Royal Navy is a microwave expert lecturer around the world. Mr. Trower lectures on the dangers of microwave technologies, 5G, and Smart Meters and how they are harmful to humans. Mr. Trower states that in 3 generations only 1 in 8 children will be healthy. Is PP&L aware of Mr. Trower's expertise and what he is telling people around the world?

32. Is PP&L aware that facebook was fined 5 Billion dollars for violating their customers privacy rights?

Page 8.

33. Was PP&L aware that Appliance Companies have been sued in court and had to pay damages due to their violation of customer rights to privacy. Without consent the appliance companies spied to take confidential and private information from consumers?

34. PP&L cannot take private and confidential information from my home and property with the intention of selling it without my consent. What puts PP&L above the law when they use electronic surveillance? Pennsylvania has laws against unlawful surveillance to include the use of drones. Therefore, explain why PP&L is an exception to that law?

a. PP&L deems as if I have a cell or other items in my home they should be aware of them but refuse to allowing me the customer the full disclosure of all test studies that PP&L had done related to microwave technologies PP&L has the microwave studies now in their possession, not releasing that documentation is unfair and bias, Please provide all of the above studies and microwave documentations.

b. PP&L has an unfounded claim that Smart Meters are safe. As a customer I want to see the research report study and evidence or proof to substantiate the fact that the microwave technologies that PP&L is introducing into my home and onto my property are safe?

c. PP&L Smart Meter microwave technology should have a closer examination based on reports anyone can find on the internet, news papers, or TV. What is PP&L hiding that they are reluctant to release information about the PP&L Smart Meter study and the microwave technology?

d. PP&L and their attorney received numerous certified mail from me which will be considered part of this case without exception. PP&L attorneys did you make PP&L aware of all the information that you received and my request to have PP&L to reinstall the Analog Meter to end the disagreement?

e. Please provide the name of PP&L personnel that you relayed all of the information to and their position?

35. PP&L knows that EMF's frequencies emitted from the Smart Meters are harmful to humans. Why is PP&L attempting hide the facts and force it upon the general public that were not made aware of the Smart Meters danger or the surveillance capability built into the Smart Meter?

36. Did PP&L tell its attorneys and the general public the whole truth about the many health problems that are associated with EMF radiation?

37. Is PP&L aware that all over our Country, the United States of America, and the around the world that people see the Smart Meters as harmful and don't want it on their property so why should I?

Page 9.

38. PP&L Smart Meters are operating their microwave technology EMF's over my copper wiring throughout my home without prior permission or consent. When did I tell PP&L that they can use my house wiring for surveillance upon me?

a. What legal grounds did PP&L have to install microwave technology that was operating throughout my home and off of my homes copper wiring without permission?

b. In the past I purchased clean electricity from PP&L with the understanding that the purchase was to be without any other compensation to PP&L or that they can use my home and property for additional money. What right did PP&L have to change the initial agreement?

c. PP&L is now providing me with unsafe microwave EMF's and dirty electric on my property and making an additional profit off of me. How is that legal?

d. PP&L has always maintained that they were responsible up to the electric utility pole and Meter utility box (only).

PP&L has always maintained that from the pole on PP&L had no jurisdiction whatsoever to make any repairs. PP&L always maintained that from the pole on it was the home owner's responsibility not PP&L's. PP&L for as long as I can remember has always recognized that my home and wiring was out of their control and they had no authority whatsoever after the pole and meter. I want to know how that changed and now PP&L, without consent, can take it upon themselves to now insist that they have a right to use my home or property for their convenience and profit off of it without compensation to the homeowner?

e. I never intended for our home wiring to be used by PP&L for search, seizure or surveillance of my personal information. PP&L never paid for the wiring, its installation nor has PP&L ever maintained any electric component in my home to include the breaker box. Please explain how PP&L can illegally make a seizure of my personal property and to profit from it by just putting in an unsafe Smart Meter on my property as if they own the property, house and the components in it? What happen to our rights?

f. I had recently replaced circuit breakers, wiring and other electrical components in my home. Since PP&L is making claim to the copper wiring, etc., is PP&L going to compensate me for any upgrade or repairs since PP&L is using the components?

39. PP&L has been Fraudulent in how they marketed their Smart Meter and misled the public into thinking that the Smart Meters were safe. Customers weren't made aware that the Smart Meters would gather information from their homes and that a profile of each

Page 10.

household could be made and give it to whoever PP&L wish. Why weren't Pennsylvania customers made aware of the larger scope of the operation that PP&L is engaging in?

a. Please provide me with a copy of all literature that PP&L has provided to the public informing them of how PP&L would be using the customer's home wiring or other components that belongs the property owner?

b. When PP&L sells information that they gather from the customer's home what input or say does a customer have to their private information or how it is to be distributed?

c. Will the information be sold to foreign countries or overseas buyers?

40. When was PP&L or any company, corporation, or state government granted the right to violate my Constitutional rights and requirements under the law of due process and protection of my fundamental rights to freedom and privacy under the law?

41. I believe that PP&L Smart Meter microwave technology is a danger to me and my families' health. Smart Meter danger has been recognize both in this county and around world as being an especially dangerous and harmful device. PP&L Smart Meter also has spyware or surveillance technology built in it that has no other definition other then an invasion of our privacy and liberties. PP&L has taken away information from within my home and off of my property that they have no legal right to. The question is under what judicial or administration of the law does PP&L have to bypass my constitutional rights?

a. Supply all documentation showing me how PP&L can take control of my property and disregard my Constitutional rights and other legal rights so they could install a Smart Meter?

42. Initially there was an opt-out from the Smart Meter for Pennsylvania customers. Please provide information clarifying how the opt-out option was terminated and the mandatory installation of the Smart Meter was instituted?

43. PP&L has failed to provide me and other Pennsylvania customers with a clear and full explanation of what radiation damage and harm to ones health could be caused by their Smart Meter. Other electrical components sold on the open market give a clear warning of any danger that their equipment such as laptop computers, cell phones, wifi equipment, microwaves and any other device that use EMF technology should be used with caution. PP&L is well aware that the above mentioned equipment can be turned off on demand unlike PP&L's Smart Meter. PP&L's Smart Meter is in operation mode 24 hours a day, 7 days a week, 365 days a year which makes PP&L's Smart Meter more dangerous considering there is no way or device to terminate the Smart Meter's microwave EMF technology that is continuously going throughout our home. Why hasn't

Page 11.

PP&L provided all Pennsylvania customers with the fact that there could be a danger related with the PP&L Smart Meter?

PP&L and their Attorney have received certified mail related to this fact. Please review the certified mail that you received.

44. It is further my understanding that the Smart Meter lacks a safety device to prevent an overload or short in the meter that could cause an electrical fire. The fact that the Smart Meter can cause fires is well documented. The question is why PP&L has been so reluctant to make all the facts concerning the Smart Meters danger public and a warning provided?

45. Please find included as evidence: every certified mail and it's components received by PPL Electric Utilities Corporation, The Public Utility Commission, Attorney Ryan and Mr. Walnock.

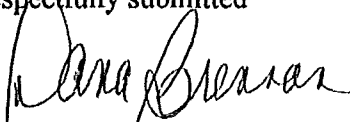
Notice of no consent to trespass, surveillance and radiation pollution and fire hazard.

All of the above have previously received this notice. However, for your convenience please find an additional 3 page copy.

PPL and attorney Ryan, you will have 20 days as I was given to comply with the above questions and to provide me with all the information requested without exception so I have a full understanding and that I am not treated with unfair bias.

Verification

Respectfully submitted

  
Dana Brennan  
July 17, 2019

cc: Honorable Elizabeth Barnes  
Rosemary Chiavetta, Secretary  
D.B.

**FROM:**

Mrs. Dana Brennan  
16 Oslo Way  
Newfoundland, PA 18445

**TO:**

Mr. Phil Walnock, Program Manager, Advanced Metering  
PPL Electric Utilities  
835 Hamilton St. Suite 150  
Allentown, PA 18101-1179

**CC:** Devin T. Ryan, Post & Schell, P.C.

17 North Second Street, 12<sup>th</sup> Floor

Harrisburg, PA 17101-1601

Pennsylvania Public Utilities Commission  
400 North Street

Harrisburg, PA 17120

Docket No. C-2019-3007121

*February 10, 2019*

*Prior to the installation of the smart meter a PPL Electric Utilities representative. Was told not to install the smart meter and left. Later without consent or permission PPL Electric Utilities snuck onto our property and installed the meter without our permission or consent.*

**NOTICE OF NO CONSENT TO TRESPASS, SURVEILLANCE AND RADIATION POLLUTION  
AND FIRE HAZARD**

**NOTICE OF LIABILITY, ADHESION CONTRACT**

Dear Mr. Phil Walnock, PPL Electric Utilities and all agents, officers, employees, contractors and interested parties,

In regard to your possible intention to install an electronic utility meter at the above address, those meters violate the law and cause endangerment to users and the public due to the following factors:

- 1) They individually identify electrical devices and record when they are operated causing invasion of privacy.
- 2) They monitor household activity and occupancy in violation of rights of domestic privacy.
- 3) They transmit wireless signals which can be intercepted by unauthorized and distant parties.
- 4) No power company or other individual or agency has consent to conduct surveillance or monitoring or to emit radiation (RF, EMR, EMF) on our property with an electronic utility meter. If such consent is presumed, it is hereby denied.
- 5) Data about occupant's daily habits and activities are collected by digital meters, recorded and stored in permanent databases which are accessed by parties not authorized or invited to know and share that private data. Employees and officers of the utility company are not authorized to collect, view or share

such private and personal data.

5) Those with access to the data can review a permanent history of household activities taken and viewed unlawfully and without the consent of occupants and subjects of the surveillance.

6) Those databases may be shared with, or fall into the hands of unauthorized law enforcement, private hackers of wireless transmissions and other unidentified parties for use against the interests of the energy subscribers and the occupants of the structures without their knowledge and consent.

7) Electronic utility meters are, by definition, surveillance devices which violate Federal and State wiretapping laws by recording and storing databases of private and personal activities and behaviors in situations where privacy is expected and private activities are recorded without the consent or knowledge of those people who are monitored.

8) It is possible for example, with analysis of certain electronic utility meter data, for unauthorized and distant parties to determine medical conditions, sexual activities, physical locations of persons within the home, vacancy patterns, general affluence, trade secrets and personal habits of occupants.

9) Digital meters cause, by intentional transmission and/or incidental disruption of house current with switch mode power supplies, cancer-causing electromagnetic radiation to be emitted in proximity of the installed location and property in violation of laws against public endangerment, assault and commission of bodily harm.

10) Digital Meters are designed to transmit using electromagnetic radiation known to cause cancer and many other diseases, illnesses and symptoms.

11) Digital meters have no surge protection and are unlawful fire hazards which are not permitted on our property.

12) FCC regulations require that no radio transmitters may be installed on private property without the consent of the property owner. Consent is hereby denied.

For the above reasons, and by right of occupancy and property ownership, I prohibit and deny consent of, any installation and use of any monitoring, eavesdropping, monitoring, surveillance and radiation emitting devices on my property and place of residence and rightful occupancy, especially in the form of an electric utility meter. Any attempt to install any such device directed at me or other occupants on my property or residence will constitute trespass, stalking, wiretapping and assault, all prohibited and punishable by law through criminal and civil actions. All persons, government agencies and private organizations responsible for installing or operating monitoring devices which I consider to be unlawful will be fully liable for major financial and compliance claims and demands in unlimited monetary value. This is legal notice. The liabilities and obligations listed above are true and binding upon all parties upon delivery of this notice. These terms and conditions apply without regard to status or existence of any "opt-out" contract.

Utility service may not be denied for refusal of unlawful conduct by the utility company or for any act of self defense or any exercise of property rights.

Because this issue is related to misconduct, violations and crimes by you and your utility company policies, no fees, charges or penalties may be associated with any remedies you are requested to provide.

Under my authority as owner and/or rightful occupant of the above property, and under your implied or expressed application to enter that property, this is an adhesion contract to which you are now bound until and unless you respond with factual and supported rebuttal to ALL of the above points in a sworn statement by an authorized and identified party within 21 days of this delivery. Any rebuttal must show your authority to install an unlawful radiation-emitting surveillance device (digital electric "meter") on my property without my consent. Because you are violating the law, your easements do not provide that authority. Expect rebuttal to any claim of such authority. Any failure to timely show and prove full and

binding authority to install the unlawful and harmful device on my property and/or place of occupancy will be agreement with all terms and conditions herein. I deny and refuse any past, present and future proposal, offer, demand or claim contrary to any terms or conditions herein.

Notice to principle is notice to agent and notice to agent is notice to principal. All rights reserved.

*Mrs. Dana Brennan 2-18-2019*

*Mrs. Dana Brennan, Property owner 16 Oslo Way, Newfoundland, PA 18445*

# APPENDIX “B”



17 North Second Street  
12th Floor  
Harrisburg, PA 17101-1601  
717-731-1970 Main  
717-731-1985 Main Fax  
www.postschell.com

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Devin Ryan

dryan@postschell.com  
717-612-6052 Direct  
717-731-1981 Direct Fax

July 30, 2019

***VIA E-MAIL (JNBRENNAN@GMAIL.COM) & FIRST CLASS MAIL***

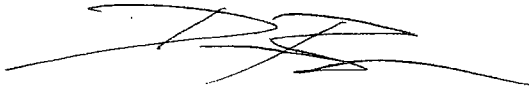
Dana Brennan  
16 Oslo Way  
Newfoundland, PA 18445

**Re: Dana Brennan v. PPL Electric Utilities Corporation**  
**Docket No. C-2019-3007121**

Dear Sir or Madam:

Enclosed are the Objections of PPL Electric Utilities Corporation to the Interrogatories of Dana Brennan (Set I), Nos. 3-6, 10-13, and 15-44; and Definitions 2 and 4-21 in the above-referenced proceeding. Copies will be provided as indicated in the Certificate of Service.

Very truly yours,



Devin Ryan

DTR/dmc  
Enclosure

cc: Rosemary Chiavetta, Secretary (*Letter and Certificate of Service Only*)  
Certificate of Service

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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

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**OBJECTIONS OF PPL ELECTRIC UTILITIES CORPORATION TO THE  
INTERROGATORIES OF DANA BRENNAN (SET I)**

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Pursuant to 52 Pa. Code § 5.342(c), PPL Electric Utilities Corporation (“PPL Electric” or the “Company”), by and through its attorneys, hereby serves these objections to Definitions 2 and 4-21 and Interrogatories 3-6, 10-13, and 15-44 of the first set of discovery requests of Dana Brennan (“Complainant”) served on July 17, 2019 via first class mail (“Complainant Set I”).<sup>1</sup>

As explained below, PPL Electric objects to these definitions and discovery requests on the grounds that they are vague, overly broad, unduly burdensome, speculative, unintelligible, irrelevant, and not reasonably calculated to lead to the discovery of admissible evidence as well as assume facts not in evidence, improperly seek a legal opinion, improperly seek communications and materials protected by attorney-client privilege and attorney work product doctrine, and/or seek highly confidential cybersecurity information.

In support, PPL Electric states as follows:

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<sup>1</sup> Because the interrogatories were only served via regular mail, three days were added to the prescribed response period. *See* 52 Pa. Code § 1.56(b).

**I. SPECIFIC OBJECTIONS**

**A. OBJECTIONS TO DEFINITIONS 2 AND 4 THROUGH 21**

1. Complainants Set I, Definitions 2 and 4 through 21 provide the following definitions for various terms:

2. EMF means Electro Magnetic Frequency.

...

4. Smart Meter means Microwave technology emitting radiation.

5. Spyware means surveillance technology employed from Smart Meters.

6. Trespassing means unauthorized PPL Electric Utilities Corporation on your property.

7. Documentation means to supply everything requested.

8. Constitutional rights means laws to protect people to assure we have rules and regulations governing what is right and not interfered with.

9. Wire tapping means the unlawful means to collect information without authorization.

10. Northern California means the death of 85 people related to GP&E Electric Utilities Corporation and their bankruptcy.

11. Mr. Barrie Trower means Royal Navy microwave expert who lectures around the world of the dangers of microwave technology from Smart Meters.

12. Facebook means lawsuit for billions of dollars for the release of personal information of their customers.

13. Vizio Corporation means loss of class action suit for surveillance and invasion of privacy.

14. Supreme Court means recognition of fundamental rights mentioned in the Constitution that is an inherent part of liberty including privacy rights.

15. Historic Supreme Court 9-0 decision means no one can take away anyone's Constitutional rights.

16. Hacked means the Smart Meter technology makes it easier for unauthorized personnel like PP&L or thieves to illegally collect information and manipulate other wifi technology in the home to commit theft, etc.

17. Under the right to know means studies, documentation, and literature of Smart Meter radiation technology findings to be released.

18. Opt-out means the desire to end dangerous Smart Meter technology, microwaves and radiation to be replaced with the original Analog Meter.

19. Compulsory control means forced upon customers without their consent.

20. Profiling means collecting information from a household illegally to put together a record of how an individual family conducts its life to include habits, likes and dislikes that could be sold on the open market to the highest bidder.

21. Court Order means when authorized personnel such as the FBI, CIA, Police or other law enforcement can prove to have good cause to search an individual's home with a search warrant.

2. The Company objects to Complainants Set I, Definitions 2 and 4 through 21 on the grounds that the definitions are vague, overly broad, and unintelligible as well as assume facts not in evidence.

3. First, all of these Definitions are completely vague and unintelligible. The definitions fail to provide specific and clear definitions of these various terms, thereby making their use in the Interrogatories extremely difficult to discern and confusing. For example, Definition 10 says that "Northern California" means "the death of 85 people related to GP&E Electric Utilities Corporation and their bankruptcy." It is completely unclear how a geographic region could mean the deaths of 85 people and a declaration of bankruptcy. Similarly, Definition 12 defines "Facebook," a social media corporation, as a "lawsuit for billions of dollars for the

release of personal information of their customers.” Thus, not only are many of the terms vague, but they proffer definitions that are contrary to their ordinary and plain meanings.

4. Second, Definitions 2, 4-9, 16-17, 19, and 20 are overly broad. These terms are not reasonably limited in scope and, as a result, make the Interrogatories in which they are used overly broad as well. As an example, “Documentation” is defined as “supply everything requested.” However, the documents and information to be produced in the Company’s discovery responses will be limited to those requests that are not objectionable, not every request propounded on the Company.

5. Third, Definitions 5, 6, and 18 assume facts not in evidence. Definition 5 assumes that “surveillance technology” is “employed from Smart Meters,” Definition 6 assumes that PPL Electric accesses property without authorization, and Definition 18 assumes that the “Smart Meter” is a “dangerous” piece of equipment. These assumptions are neither correct nor are they in the record.

6. Based on the foregoing, these Definitions are vague, overly broad, and unintelligible as well as assume facts not in evidence.

**B. OBJECTIONS TO INTERROGATORY 3**

7. Complainants Set I, Interrogatory 3 requests the following:

3. PP&L Smart Meter installer was told personally not to install the Smart Meter and left. Then on a later date came back onto the property by trespassing and installed the Smart Meter without any consent or notice to the property owner. By what right does PP&L have to put microwave technology or spy ware on any ones property without consent?

8. The Company objects to Complainants Set I, Interrogatory 3 because it is vague, assumes facts not in evidence, and improperly seeks a legal opinion.

9. First, the interrogatory is vague as to what “microwave technology” and “spy ware” mean in this context. Indeed, it is unclear whether these terms simply mean the new automated metering infrastructure (“AMI”) meter or something else. Moreover, this discovery request generally refers to “Smart Meter” but fails to specify the precise model type. As a result, the request is not limited to the actual Landis + Gyr AMI meters that PPL Electric is deploying for its residential customers, including the Complainant. Specifically, the AMI meter installed on the Complainant’s property is the Landis + Gyr E350 FOCUS AXR-SD meter. Without such clarification, PPL Electric cannot reasonably answer the interrogatory.

10. Second, the interrogatory assumes facts not in evidence, particularly regarding the complainant’s interactions with a “Smart Meter installer.” Further, the interrogatory claims that PPL Electric installed the AMI meter without any “notice to the property owner” and asserts, potentially, that the AMI meter would be “spy ware.” None of these alleged facts are in the record.

11. Third, the interrogatory improperly seeks a legal opinion. The Company’s witnesses are not lawyers who can provide legal opinions. Further, discovery is intended for the discovery of facts and evidence that may be presented at the evidentiary hearing, not the legal opinions of the Company’s attorneys that are protected by attorney-client privilege and the attorney work product doctrine. Rather, PPL Electric’s legal arguments will be set forth in its closing argument and its briefs, if any, that are submitted in this proceeding.

12. For these reasons, this interrogatory is vague, assumes facts not in evidence, and improperly seeks a legal opinion.

**C. OBJECTIONS TO INTERROGATORY 4**

13. Complainants Set I, Interrogatory 4 requests the following:

4. PP&L was informed by phone and certified mail to remove the dangerous Smart Meter due to it being unsafe and threatening to our family's health as outlined in all the letters received by PP&L and their attorneys. Why then at this late date has the Smart Meter not been removed? Refer to all the certified mail and their contents explaining my rejection to the Smart Meter and add the entire contents as argument.

14. The Company objects to Complainants Set I, Interrogatory 4 because it is vague and assumes facts not in evidence.

15. First, the interrogatory is vague as to what "unsafe" and "threatening to our family's health" mean. Moreover, the interrogatory generally tries to refer to unspecified phone conversations and documents allegedly sent by certified mail. Further, this discovery request generally refers to "Smart Meter" but fails to specify the precise model type. As a result, the request is not limited to the actual Landis + Gyr AMI meters that PPL Electric is deploying for its residential customers, including the Complainant. Specifically, the AMI meter installed on the Complainant's property is the Landis + Gyr E350 FOCUS AXR-SD meter. Without such clarification, PPL Electric cannot reasonably answer the interrogatory.

16. Second, the interrogatory assumes facts not in evidence, such as the AMI meter being "unsafe" and "threatening to [the Complainant's] family's health" as well as the contents of these unspecified documents allegedly sent by certified mail. None of these alleged facts are in the record.

17. Based on the foregoing, this interrogatory is vague and assumes facts not in evidence.

**D. OBJECTIONS TO INTERROGATORY 5**

18. Complainants Set I, Interrogatory 5 requests the following:

5. Northern California lost 90% of their population due to GP&E Electric Utilities Corporation fires caused by Smart Meters. Many people had to relocate and 85 people were killed as a result of the fires. GP&E now filed for bankruptcy citing over \$30 Billion in claims. What insurance does PP&L Electric Utilities give my family if there is a fire or my family becomes sick from the EMF radiation transmitted from the Smart Meter?

19. The Company objects to Complainants Set I, Interrogatory 5 because it is vague, speculative, and not reasonably calculated to lead to the discovery of admissible evidence and assumes facts not in evidence.

20. First, the interrogatory is vague, speculative, and not reasonably calculated to lead to the discovery of admissible evidence. The interrogatory posits a completely speculative scenario in which a “fire” under unspecified circumstances is caused by the AMI meter as well as a family member becoming “sick” from the “EMF radiation.” Moreover, it is unclear what “insurance” the Complainant is referencing, whether it is an insurance policy or some other type of “insurance.”

21. Second, the interrogatory assumes facts not in evidence, such as the fire in Northern California where, according to the interrogatory, “90% of their population” was lost due to “GP&E Electric Utilities Corporation fires caused by Smart Meters.” Not only are these allegations completely inaccurate, as it appears the Complainant may be referring to the incidents involving Pacific Gas & Electric Company (“PG&E”) that did not involve AMI meters causing wildfires and obviously Northern California did not lose “90% of their population,” but none of these alleged facts are in the record.

22. Based on the foregoing, this interrogatory is vague and assumes facts not in evidence.

**E. OBJECTIONS TO INTERROGATORY 6**

23. Complainants Set I, Interrogatory 6 requests the following:

6. What insurance company is PP&L insured with?

24. The Company objects to Complainants Set I, Interrogatory 6 because it is vague, overly broad, irrelevant, and not reasonably calculated to lead to the discovery of admissible evidence.

25. The interrogatory fails to specify what actual insurance policy details it is seeking. It simply asks the Company to provide the name of the “insurance company” it is “insured with.” There is no limitation to the actual insurance policies that would be related to the Company’s AMI meters. Moreover, the Company’s decision to insure or self-insure its various practices is irrelevant and not reasonably calculated to lead to the discovery of admissible evidence.

26. For these reasons, this interrogatory is vague, overly broad, irrelevant, and not reasonably calculated to lead to the discovery of admissible evidence.

**F. OBJECTIONS TO INTERROGATORY 10**

27. Complainants Set I, Interrogatory 10 requests the following:

10. PP&L is using the Smart Meter to gather information from my home and off of my property to sell to a third party without consent. What right does PP&L have to take any information I didn’t consent to?

28. The Company objects to Complainants Set I, Interrogatory 10 because it assumes facts not in evidence and improperly seeks a legal opinion.

29. First, the interrogatory assumes facts not in evidence. The interrogatory assumes that PPL Electric “sell[s]” information gathered from the Complainant’s AMI meter to “third part[ies] without consent.” None of these alleged facts are in the record.

30. Second, the interrogatory improperly seeks a legal opinion. The Company's witnesses are not lawyers who can provide legal opinions. Further, discovery is intended for the discovery of facts and evidence that may be presented at the evidentiary hearing, not the legal opinions of the Company's attorneys that are protected by attorney-client privilege and the attorney work product doctrine. Rather, PPL Electric's legal arguments will be set forth in its closing argument and its briefs, if any, that are submitted in this proceeding.

31. Based on the foregoing, this interrogatory assumes facts not in evidence and improperly seeks a legal opinion.

**G. OBJECTIONS TO INTERROGATORY 11**

32. Complainants Set I, Interrogatory 11 requests the following:

11. PP&L is engaging in wire tapping without a Court Order. Under what law does PP&L have the right to violate my Constitutional rights to privacy and other laws as stated in the number of certified mail sent to both PP&L and their attorneys?

33. The Company objects to Complainants Set I, Interrogatory 11 because it assumes facts not in evidence and improperly seeks a legal opinion.

34. First, the interrogatory assumes facts not in evidence. The interrogatory assumes that PPL Electric is "engaging in wire tapping without a Court Order" and that PPL Electric "violate[s]" constitutional rights to privacy and other laws. None of these alleged facts are in the record.

35. Second, the interrogatory improperly seeks a legal opinion. The Company's witnesses are not lawyers who can provide legal opinions. Further, discovery is intended for the discovery of facts and evidence that may be presented at the evidentiary hearing, not the legal opinions of the Company's attorneys that are protected by attorney-client privilege and the

attorney work product doctrine. Rather, PPL Electric's legal arguments will be set forth in its closing argument and its briefs, if any, that are submitted in this proceeding.

36. For these reasons, this interrogatory assumes facts not in evidence and improperly seeks a legal opinion.

**H. OBJECTIONS TO INTERROGATORY 12**

37. Complainants Set I, Interrogatory 12 requests the following:

12. Over the years PP&L received payments from [sic] me in the form of money for their service without any other demand or additional conditions or compensation. Why is PP&L now demanding more in return for electric service provided through the Smart Meter when we initially objected to the installation and made it clear we wanted to keep an Analog meter?

38. The Company objects to Complainants Set I, Interrogatory 12 because it is vague and assumes facts not in evidence.

39. First, the interrogatory is vague. The discovery request is completely unclear as to what "demanding more in return for electric service" means. For example, this language could be read to encompass financial compensation or something else. Therefore, the interrogatory is entirely vague.

40. Second, the interrogatory assumes facts not in evidence. The interrogatory assumes that PPL Electric is "demand more in return for electric service provided through the Smart Meter." Even assuming this language was not vague, there is nothing in the record establishing that PPL Electric does in fact "demand[] more in return for electric service provided through the Smart Meter."

41. Based on the foregoing, this interrogatory is vague and assumes facts not in evidence.

**I. OBJECTIONS TO INTERROGATORY 13**

42. Complainants Set I, Interrogatory 13 requests the following:

13. PP&L will sell any information they unlawfully gathered from me, how much money will PP&L make from me and all the other PP&L customers on a yearly basis? Please enter cash Amount \_\_\_\_\_.

43. The Company objects to Complainants Set I, Interrogatory 13 because it assumes facts not in evidence.

44. The interrogatory assumes that PPL Electric “will sell any information” obtained from the new AMI meter and that the Company “unlawfully gather[s]” such information. None of these alleged facts are in the record. Moreover, the Company does not sell information collected through the AMI meter.

45. Based on the foregoing, this interrogatory assumes facts not in evidence.

**J. OBJECTIONS TO INTERROGATORY 15**

46. Complainants Set I, Interrogatory 15 requests the following:

15. To date: Give the number of PP&L customers who have requested to opt-out of the Smart Meter due to fear of health problems caused by PP&L’s Smart Meter dangerous radiation levels. Please include customers that don’t want PP&L spyware or surveillance of their private information. Amount \_\_\_\_\_.

a. Pennsylvania customers are forced to call an out of state representative when attempting to make a complaint or request to opt-out from the Smart Meter. PP&L is purposely re-routing Pennsylvania customers making it extremely inconvenient to place a complaint so that the customers are discourage from making a complaint. Give a full disclosure of out of state phone calls as well as letters from PP&L customers requesting to opt-out of the Smart Meter?

b. Who schooled the out of state PP&L representatives who receive complaints and concerns from customers in Pennsylvania concerning PP&L installing Smart Meters on

their homes and properties after being instructed not to trespass or install a Smart Meter?

c. It is PP&L's common practice to tell customers that if they don't want the Smart Meters PP&L will discontinue their electrical service entirely. When did PP&L start a compulsory control over the Pennsylvania people with the Smart Meter?

d. Please provide all the names of PP&L personal [sic] and board members with the authority to demand change over my state law regulations and Constitutional rights?

47. The Company objects to Complainants Set I, Interrogatory 15 because it is vague, overly broad, irrelevant, and not reasonably to lead to the discovery of admissible evidence as well as assumes facts not in evidence and improperly seeks a legal opinion.

48. First, the interrogatory makes several assumptions of fact that are not in evidence, including that the radio frequency ("RF") field emissions from the AMI meter are "dangerous radiation levels," that the Company is deploying "spyware or surveillance of [customers'] private information," that "Pennsylvania customers are forced to call an out of state representative when attempting to make a complaint or request to opt-out," that the Company is "purposely re-routing Pennsylvania customers" to discourage customers from making complaints, and that PPL Electric has "compulsory control over the Pennsylvania people with the Smart Meter." None of these alleged facts are in the record.

49. Second, the interrogatory is vague. It is unclear what is meant by the Company "re-routing Pennsylvania customers," the "out of state PP&L representatives" being "schooled" about the AMI meters, the alleged "compulsory control over the Pennsylvania people," and "demand[ing] change over [the Complainant's] state law regulations and Constitutional rights."

50. Third, the interrogatory is overly broad, irrelevant, and not reasonably calculated to lead to the discovery of admissible evidence. The scope of the instant Complaint is limited to

the deployment of the new AMI meter on the Complainant's property. The Complainant does not have standing to represent the interests of every other PPL Electric customer. Moreover, subpart (a) asks the Company to "[g]ive a full disclosure of out of state phone calls as well as letters from PP&L customers requesting to opt-out of the Smart Meter." The Company is finishing the process of deploying new AMI meters for 1.4 million customers. PPL Electric reasonably cannot be expected to provide a written account of all "out of state phone calls," whatever they may be, and any letters sent by customers to the Company objecting to the AMI meter deployment.

51. Fourth, subpart (d) of the interrogatory improperly seeks a legal opinion. The Company's witnesses are not lawyers who can provide legal opinions. Further, discovery is intended for the discovery of facts and evidence that may be presented at the evidentiary hearing, not the legal opinions of the Company's attorneys that are protected by attorney-client privilege and the attorney work product doctrine. Rather, PPL Electric's legal arguments will be set forth in its closing argument and its briefs, if any, that are submitted in this proceeding.

52. Based on the foregoing, this interrogatory is vague, overly broad, irrelevant, and not reasonably to lead to the discovery of admissible evidence as well as assumes facts not in evidence and improperly seeks a legal opinion.

**K. OBJECTIONS TO INTERROGATORY 16**

53. Complainants Set I, Interrogatory 16 requests the following:

16. PP&L was aware that the Smart Meter that they forced on me and other customers has many health risks. Why didn't PP&L give me and other customer's realistic facts and notice of the health risks that come with the Smart Meter?

54. The Company objects to Complainants Set I, Interrogatory 16 because it is vague, speculative, overly broad, irrelevant, and not reasonably to lead to the discovery of admissible evidence as well as assumes facts not in evidence.

55. First, the interrogatory makes several assumptions of fact that are not in evidence, including that the Company allegedly “was aware that the Smart Meter . . . has many health risks” and that PPL Electric failed to provide the Complainant and other customers “realistic facts.” None of these alleged facts are in the record.

56. Second, the interrogatory is vague and speculative. It is unclear what is meant by “health risks,” as the discovery request fails to actually specify what those alleged health risks are. Moreover, answering this discovery request would require PPL Electric to speculate about alleged “health risks” for both the Complainant and unnamed “other customers.”

57. Third, the interrogatory is overly broad, irrelevant, and not reasonably calculated to lead to the discovery of admissible evidence. The scope of the instant Complaint is limited to the deployment of the new AMI meter on the Complainant’s property. The Complainant does not have standing to represent the interests of every other PPL Electric customer.

58. Based on the foregoing, this interrogatory is vague, speculative, overly broad, irrelevant, and not reasonably to lead to the discovery of admissible evidence as well as assumes facts not in evidence.

**L. OBJECTIONS TO INTERROGATORY 17**

59. Complainants Set I, Interrogatory 17 requests the following:

17. What right does PP&L have to know what electric appliances that I have or the make of the appliance?

60. The Company objects to Complainants Set I, Interrogatory 17 because it improperly seeks a legal opinion.

61. The Company's witnesses are not lawyers who can provide legal opinions. Further, discovery is intended for the discovery of facts and evidence that may be presented at the evidentiary hearing, not the legal opinions of the Company's attorneys that are protected by attorney-client privilege and the attorney work product doctrine. Rather, PPL Electric's legal arguments will be set forth in its closing argument and its briefs, if any, that are submitted in this proceeding.

62. For these reasons, the interrogatory improperly seeks a legal opinion.

**M. OBJECTIONS TO INTERROGATORY 18**

63. Complainants Set I, Interrogatory 18 requests the following:

18. What right does PP&L have to invade our privacy through the Smart Meter by profiling my family and I by knowing when we get up in the morning, leave the house, go from room to room, come home, go to bed, or what we may be viewing on TV?

NOTE: Vizio TV company recently lost a class action law suit for using their Smart TV's to surveillance customers as PP&L is attempting to do to us with the Smart Meter.

a. Other PP&L customers and I have experienced electrical equipment such as a TV turning itself off without any explanation other than the recent Smart Meter installation. What right does PP&L have to determine when a customer's use of electric should be terminated other than non-payment of a bill?

64. The Company objects to Complainants Set I, Interrogatory 18 because it is irrelevant, assumes facts not in evidence, and improperly seeks a legal opinion.

65. First, the interrogatory assumes facts not in evidence, including that the Company "profil[es]" the Complainant and her family "by knowing when [they] get up in the morning, leave the house, go from room to room, come home, go to bed, or what [they] may be viewing on TV" and that the Complainant and other unnamed "PP&L customers" have "experienced electrical equipment such as a TV turning itself off without any explanation other than the recent

Smart Meter installation.” Moreover, the discovery request references an alleged class action lawsuit involving Vizio smart televisions and claims that PPL Electric is trying to do the same as Vizio. None of these alleged facts is in the record.

66. Second, the interrogatory improperly seeks a legal opinion. The Company’s witnesses are not lawyers who can provide legal opinions. Further, discovery is intended for the discovery of facts and evidence that may be presented at the evidentiary hearing, not the legal opinions of the Company’s attorneys that are protected by attorney-client privilege and the attorney work product doctrine. Rather, PPL Electric’s legal arguments will be set forth in its closing argument and its briefs, if any, that are submitted in this proceeding.

67. Third, the alleged Vizio class action lawsuit is irrelevant to this proceeding. The issues in this formal complaint proceeding are limited to whether the Company is legally required to install the new AMI meter and whether such installation would violate Section 1501 of the Public Utility Code, 66 Pa. C.S. § 1501, which requires the Company to provide safe, reliable, and reasonable service to its customers. The alleged Vizio class action lawsuit has nothing to do with the resolution of these issues.

68. Based on the foregoing, the interrogatory is irrelevant, assumes facts not in evidence, and improperly seeks a legal opinion.

**N. OBJECTIONS TO INTERROGATORY 19**

69. Complainants Set I, Interrogatory 19 requests the following:

19. PP&L has made it easier for my home to be hacked into with the Smart Meter. So the question is: If the privacy of our home is hacked into and our personal information is stolen with other items, how will PP&L compensate us for making us and our home more vulnerable?

70. The Company objects to Complainants Set I, Interrogatory 19 because it is vague, speculative, and not reasonably calculated to lead to the discovery of admissible evidence and assumes facts not in evidence.

71. First, the interrogatory assumes facts not in evidence, particularly that the Company allegedly “has made it easier for [the Complainant’s] home to be hacked into with the Smart Meter.” This alleged fact is not in the record and cannot be assumed in this interrogatory as being true.

72. Second, the interrogatory is vague, speculative, and not reasonably calculated to lead to the discovery of admissible evidence. The interrogatory posits a completely speculative scenario in which the Complainant’s “home” is hacked and her family’s “personal information” is stolen under unspecified circumstances and asks the Company to indicate how it will “compensate” them in this vague and speculative situation. Moreover, the issues in this formal complaint proceeding are limited to whether the Company is legally required to install the new AMI meter and whether such installation would violate Section 1501 of the Public Utility Code, 66 Pa. C.S. § 1501, which requires the Company to provide safe, reliable, and reasonable service to its customers. The Company’s willingness to compensate customers under vague, hypothetical circumstances has nothing to do with the resolution of these issues. Further, PPL Electric’s decision whether or not to compensate customers in the future should not and cannot be construed as an admission of the new AMI meters presenting privacy concerns.

73. Based on the foregoing, the interrogatory is vague, speculative, and not reasonably calculated to lead to the discovery of admissible evidence and assumes facts not in evidence.

**O. OBJECTIONS TO INTERROGATORY 20**

74. Complainants Set I, Interrogatory 20 requests the following:

20. PP&L has unlawfully taken away our freedom, peace of mind, independence and made us feel unsafe in our own home. With the Smart Meter spyware PP&L has put our safety and well being in jeopardy as PP&L put our family lives and privacy up for sale to the highest bidder only so PP&L could profit without any concerns for our safety or health. This is a direct violation to our Constitutional rights and other laws that prohibit the use of technology to spy unlawfully on a citizen without a Court Order. When did PP&L get a Court Order?

Please refer to numerous certified mail outlining our complaint and other issues related to this matter PP&L and their attorney have previously received.

75. The Company objects to Complainants Set I, Interrogatory 20 because it is vague, assumes facts not in evidence, and improperly seeks a legal opinion.

76. First, the interrogatory assumes facts not in evidence, including that the Company has “taken away” the Complainant’s family’s “freedom, peace of mind, independence,” has made them “feel unsafe,” and has installed “spyware” that “has put [the Complainant’s family’s] safety and well being in jeopardy as PP&L put [their] lives and privacy up for sale to the highest bidder only so PP&L could profit without any concerns for [their] safety or health.” None of these alleged facts is in the record.

77. Second, the interrogatory improperly seeks a legal opinion. The Company’s witnesses are not lawyers who can provide legal opinions. Further, discovery is intended for the discovery of facts and evidence that may be presented at the evidentiary hearing, not the legal opinions of the Company’s attorneys that are protected by attorney-client privilege and the attorney work product doctrine. Rather, PPL Electric’s legal arguments will be set forth in its closing argument and its briefs, if any, that are submitted in this proceeding.

78. Third, the interrogatory is vague as to what “spyware” means and generally references, rather than specifically identifying, “numerous certified mail” documents that were allegedly sent to PPL Electric and its attorneys. Without clarification as to these terms, PPL Electric cannot reasonably answer the interrogatory.

79. For these reasons, the interrogatory is vague, assumes facts not in evidence, and improperly seeks a legal opinion.

**P. OBJECTIONS TO INTERROGATORY 21**

80. Complainants Set I, Interrogatory 21 requests the following:

21. PP&L is in violation of my Constitutional and Civil Rights and other laws by profiting not just once with the sale of electric to me, but two times or more by selling what they don't legally own by law. PP&L themselves did not produce the information generated within my home but is unlawfully taking information that belongs to me only in an attempt to sell it, what gives PP&L the right to take something from within my home and my property to sell it?

81. The Company objects to Complainants Set I, Interrogatory 21 because it is vague, assumes facts not in evidence, and improperly seeks a legal opinion.

82. First, the interrogatory assumes facts not in evidence, including that the Company is “profiting not just once with the sale of electric to [the Complainant], but two times or more by selling” information collected from the AMI meter. None of these alleged facts is in the record.

83. Second, the interrogatory improperly seeks a legal opinion. The Company’s witnesses are not lawyers who can provide legal opinions. Further, discovery is intended for the discovery of facts and evidence that may be presented at the evidentiary hearing, not the legal opinions of the Company’s attorneys that are protected by attorney-client privilege and the attorney work product doctrine. Rather, PPL Electric’s legal arguments will be set forth in its closing argument and its briefs, if any, that are submitted in this proceeding.

84. Third, the interrogatory is vague as to what “information” the Company is allegedly collecting through the AMI meter and selling to third parties. Without clarification as to this term, PPL Electric cannot reasonably answer the interrogatory.

85. Based on the foregoing, the interrogatory is vague, assumes facts not in evidence, and improperly seeks a legal opinion.

**Q. OBJECTIONS TO INTERROGATORY 22**

86. Complainants Set I, Interrogatory 22 requests the following:

22. PP&L, without any compensation to me, uses their Smart Meter without my consent, to sells [sic] my information that lawfully belongs only to me and not at all to PP&L. So the question is: How can PP&L take a customer's private and confidential information and sell it without any further compensation to the individual who is the author and lawful owner to the literature or information PP&L is attempting to gather and sell?

87. The Company objects to Complainants Set I, Interrogatory 22 because it is vague, assumes facts not in evidence, and improperly seeks a legal opinion.

88. First, the interrogatory assumes facts not in evidence, including that the Company allegedly collects “literature or information” through the AMI meter and then sells the Complainant’s “private and confidential information” to third parties without compensating the Complainant. None of these alleged facts is in the record.

89. Second, the interrogatory improperly seeks a legal opinion. The Company’s witnesses are not lawyers who can provide legal opinions. Further, discovery is intended for the discovery of facts and evidence that may be presented at the evidentiary hearing, not the legal opinions of the Company’s attorneys that are protected by attorney-client privilege and the attorney work product doctrine. Rather, PPL Electric’s legal arguments will be set forth in its closing argument and its briefs, if any, that are submitted in this proceeding.

90. Third, the interrogatory is vague as to what “literature or information” the Company is allegedly collecting through the AMI meter and selling to third parties. Without clarification as to these terms, PPL Electric cannot reasonably answer the interrogatory.

91. Based on the foregoing, the interrogatory is vague, assumes facts not in evidence, and improperly seeks a legal opinion.

**R. OBJECTIONS TO INTERROGATORY 23**

92. Complainants Set I, Interrogatory 23 requests the following:

23. Does PP&L in some way supersede all of my Constitutional rights, such as the First, Fourth, & Fourteenth Amendments' as well as other Pennsylvania laws and Amendments assuring and guaranteeing my rights to privacy? Please refer to certified mail that you have received with other explanations regarding this issue and provide me with an answer?

b. PP&L and their attorney received Certified mail related to the violation of my rights. How does PP&L over ride my privacy rights and takes away my Constitutional rights to privacy?<sup>2</sup>

93. The Company objects to Complainants Set I, Interrogatory 23 because it is vague and improperly seeks a legal opinion.

94. First, the interrogatory improperly seeks a legal opinion. The Company’s witnesses are not lawyers who can provide legal opinions. Further, discovery is intended for the discovery of facts and evidence that may be presented at the evidentiary hearing, not the legal opinions of the Company’s attorneys that are protected by attorney-client privilege and the attorney work product doctrine. Rather, PPL Electric’s legal arguments will be set forth in its closing argument and its briefs, if any, that are submitted in this proceeding.

95. Second, the interrogatory is vague because it generally references, but does not specifically identify, “certified mail” documents that were allegedly sent to PPL Electric and its

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<sup>2</sup> PPL Electric notes that there is no subpart (a) to Interrogatory 23.

attorneys. Without clarification as to these documents, PPL Electric cannot reasonably answer the interrogatory.

96. For these reasons, the interrogatory is vague and improperly seeks a legal opinion.

**S. OBJECTIONS TO INTERROGATORY 24**

97. Complainants Set I, Interrogatory 24 requests the following:

24. I don't have any confidence in PP&L safeguarding any information coming from my home. I maintain that it's my responsibility and right to say what goes out of my home and property and to whom. Not PP&L, PP&L is only looking to profit off of me. What safeguard is PP&L guaranteeing and what information would PP&L be limited to if they had my consent?

98. The Company objects to Complainants Set I, Interrogatory 24 because it is vague, is not reasonably calculated to lead to the discovery of admissible evidence, assumes facts not in evidence, and seeks highly confidential cybersecurity information.

99. First, the interrogatory assumes facts not in evidence, including that the Complainant does not “have any confidence in PP&L safeguarding any information” and that PPL Electric “is only looking to profit off of [the Complainant].” None of these alleged facts is in the record.

100. Second, the interrogatory is vague and not reasonably calculated to lead to the discovery of admissible evidence. The discovery request asks about the “safeguard” that the Company is “guaranteeing” and refers to some “consent” provided by the Complainant that would purportedly limit the “information” collected by PPL Electric. Without clarification as to these terms, the Company cannot reasonably answer the interrogatory.

101. Third, PPL Electric objects to the extent that the interrogatory seeks highly confidential cybersecurity information that should not be publicly disclosed, as disclosure of such information would necessarily place the Company's systems at undue and unnecessary risk.

Moreover, the Company will provide substantial information about its privacy and cybersecurity practices and protocols in the pre-served written testimony of Kevin Durkin (PPL Electric Statement No. 3) and Donald Vinciguerra (PPL Electric Statement No. 4) in accordance with the established litigation schedule. Disclosure of any further details about the Company's cybersecurity practices may jeopardize the integrity and efficacy of PPL Electric's cybersecurity plans and practices.

102. Based on the foregoing, the interrogatory is vague, is not reasonably calculated to lead to the discovery of admissible evidence, assumes facts not in evidence, and seeks highly confidential cybersecurity information.

**T. OBJECTIONS TO INTERROGATORY 25**

103. Complainants Set I, Interrogatory 25 requests the following:

25. Hacked! The Government, IRS, US Mail service, Military, and dozens more have been hacked. So what makes PP&L any safer?

a. Why should I think PP&L would do a better job in safeguarding my information when PP&L have all intentions of selling my information?

b. Once PP&L sells my information, will they wash their hands of it and not take any responsibility for how it is used?

c. Who is PP&L exchanging my private information with?

104. The Company objects to Complainants Set I, Interrogatory 25 because it is vague, is not reasonably calculated to lead to the discovery of admissible evidence, assumes facts not in evidence, and seeks highly confidential cybersecurity information.

105. First, the interrogatory assumes facts not in evidence, including that the "Government, IRS, US Mail service, Military, and dozens more have been hacked," that the

Company “sells” the Complainant’s “information” to third parties, and that the Company has “all intentions of selling [her] information.” None of these alleged facts is in the record.

106. Second, the interrogatory is vague and not reasonably calculated to lead to the discovery of admissible evidence. The discovery request asks about what the Company does to make the Company “safer” than these other entities. Further, the interrogatory asks about what entities the Company is “exchanging” information with; however, it is unclear whether that relates to the Complainant’s claim that the Company “sells” information or whether this refers to the Company simply providing the information without compensation. Moreover, the Complainant’s interrogatory generally refers to the “Government, IRS, US Mail service, Military, and dozens more” but utterly fails to provide any further specifics on the actual entities to which it is referring. Without clarification as to these terms, the Company cannot reasonably answer the interrogatory.

107. Third, PPL Electric objects to the extent that the interrogatory seeks highly confidential cybersecurity information that should not be publicly disclosed, as disclosure of such information would necessarily place the Company’s systems at undue and unnecessary risk. Moreover, the Company will provide substantial information about its privacy and cybersecurity practices and protocols in the pre-served written testimony of Kevin Durkin (PPL Electric Statement No. 3) and Donald Vinciguerra (PPL Electric Statement No. 4) in accordance with the established litigation schedule. Disclosure of any further details about the Company’s cybersecurity practices may jeopardize the integrity and efficacy of PPL Electric’s cybersecurity plans and practices.

108. For these reasons, the interrogatory is vague, is not reasonably calculated to lead to the discovery of admissible evidence, assumes facts not in evidence, and seeks highly confidential cybersecurity information.

**U. OBJECTIONS TO INTERROGATORY 25A<sup>3</sup>**

109. Complainants Set I, Interrogatory 25A requests the following:

25A. Is PP&L aware that there have been several class action law suits addressing violations of the privacy act and the complainants won their court actions? What would be the argument that PP&L would have?

110. The Company objects to Complainants Set I, Interrogatory 25A because it is vague, speculative, irrelevant, and not reasonably calculated to lead to the discovery of admissible evidence and assumes facts not in evidence.

111. First, the interrogatory assumes facts not in evidence, including that “there have been several class action law suits addressing violations of the privacy act and the complainants won their court actions.” None of these alleged facts is in the record.

112. Second, the interrogatory is vague, speculative, irrelevant, and not reasonably calculated to lead to the discovery of admissible evidence. The discovery request is completely unclear as to what “privacy act” and “class action law suits” are being referenced. Moreover, the issues in this formal complaint proceeding are limited to whether the Company is legally required to install the new AMI meter and whether such installation would violate Section 1501 of the Public Utility Code, 66 Pa. C.S. § 1501, which requires the Company to provide safe, reliable, and reasonable service to its customers. The Company’s argument in a speculative class action lawsuit about alleged “violations of the privacy act” under completely unknown and unspecified circumstances has nothing to do with the resolution of these issues.

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<sup>3</sup> In Complainants Set I, there were two interrogatories numbered “25.” Accordingly, the Company has renamed the second number “25” as “25A” to avoid confusion.

113. Based on the foregoing, the interrogatory is vague, speculative, irrelevant, and not reasonably calculated to lead to the discovery of admissible evidence and assumes facts not in evidence.

**V. OBJECTIONS TO INTERROGATORY 26**

114. Complainants Set I, Interrogatory 26 requests the following:

26. Does PP&L have any open court cases at present to include class action suits? If so how many?

115. The Company objects to Complainants Set I, Interrogatory 26 because it is overly broad, irrelevant, and not reasonably calculated to lead to the discovery of admissible evidence and assumes facts not in evidence.

116. The discovery request asks the Company to provide the number of “any open court cases at present” that the Company has. However, the issues in this formal complaint proceeding are limited to whether the Company is legally required to install the new AMI meter and whether such installation would violate Section 1501 of the Public Utility Code, 66 Pa. C.S. § 1501, which requires the Company to provide safe, reliable, and reasonable service to its customers. The number of the Company’s “open court cases at present to include class action suits” has nothing to do with the resolution of these issues. Indeed, the interrogatory is not even limited to court cases involving the Company’s new AMI meters.

117. For these reasons, the interrogatory is overly broad, irrelevant, and not reasonably calculated to lead to the discovery of admissible evidence and assumes facts not in evidence.

**W. OBJECTIONS TO INTERROGATORY 27**

118. Complainants Set I, Interrogatory 27 requests the following:

27. Supreme Court opinion notes (We) are fundamental, a free society and have other Constitutional Liberties and basic Civil Rights, to include the right to enjoy the peace of mind in the

privacy of our home. Where does it say that PP&L has the right to interfere with any of my rights?

119. The Company objects to Complainants Set I, Interrogatory 27 because it improperly seeks a legal opinion.

120. The Company's witnesses are not lawyers who can provide legal opinions. Further, discovery is intended for the discovery of facts and evidence that may be presented at the evidentiary hearing, not the legal opinions of the Company's attorneys that are protected by attorney-client privilege and the attorney work product doctrine. Rather, PPL Electric's legal arguments will be set forth in its closing argument and its briefs, if any, that are submitted in this proceeding.

121. Based on the foregoing, the interrogatory improperly seeks a legal opinion.

#### **X. OBJECTIONS TO INTERROGATORY 28**

122. Complainants Set I, Interrogatory 28 requests the following:

28. In a Historic Supreme Court 9-0 decision on the Constitution Eight Amendment, it is cruel and unusual punishment as to deprivation of property without due process of law, this applies to all States. PP&L has made me and other family members victim's [sic] of unjust property seizure.

What right did PP&L have to seize anything from my property or home?

123. The Company objects to Complainants Set I, Interrogatory 28 because it assumes facts not in evidence and improperly seeks a legal opinion.

124. First, the interrogatory assumes facts not in evidence, particularly that the Company allegedly "has made [the Complainant] and other family members" the "victim[s] of unjust property seizure" and that PPL Electric has "seize[d]" something from the Complainant's property or home. None of these alleged facts is in the record.

125. Second, the discovery request improperly seeks a legal opinion. The Company's witnesses are not lawyers who can provide legal opinions. Further, discovery is intended for the discovery of facts and evidence that may be presented at the evidentiary hearing, not the legal opinions of the Company's attorneys that are protected by attorney-client privilege and the attorney work product doctrine. Rather, PPL Electric's legal arguments will be set forth in its closing argument and its briefs, if any, that are submitted in this proceeding.

126. For these reasons, the interrogatory assumes facts not in evidence and improperly seeks a legal opinion.

**Y. OBJECTIONS TO INTERROGATORY 29**

127. Complainants Set I, Interrogatory 29 requests the following:

29. Top scientist in 40 countries signed a protection saying not to go ahead with the microwave technology that it is a danger, Smart Meters are harmful to humans. Why didn't PP&L give its customers any warning of the dangers?

128. The Company objects to Complainants Set I, Interrogatory 29 because it is vague, speculative, and not reasonably calculated to lead to the discovery of admissible evidence and assumes facts not in evidence.

129. First, the interrogatory assumes facts not in evidence, including that "[t]op scientist in 40 countries" allegedly "signed a protection saying not to go ahead with the microwave technology that it is a danger" and that "Smart Meters are harmful to humans." None of these alleged facts is in the record.

130. Second, the interrogatory is vague, speculative, and not reasonably calculated to lead to the discovery of admissible evidence. The discovery request uses the vague term "microwave technology" and speculates that it is a "danger" and "harmful to humans." Moreover, the interrogatory never specifically provides the name of this "protection" allegedly

signed by scientists, nor does it even provide the names of some of these scientists. Additionally, the interrogatory generally refers to “Smart Meters” but fails to specify the precise model type. Indeed, the request is not limited to the actual Landis + Gyr AMI meters that PPL Electric is deploying for its residential customers, including the Complainant. Specifically, the AMI meter that was installed on the Complainant’s property is the Landis + Gyr E350 FOCUS AXR-SD meter.

131. For these reasons, the interrogatory is vague, speculative, and not reasonably calculated to lead to the discovery of admissible evidence and assumes facts not in evidence.

**Z. OBJECTIONS TO INTERROGATORY 30**

132. Complainants Set I, Interrogatory 30 requests the following:

30. Please release to me all technical reports and studies done relating to any and all findings to include the Smart Meter radiation EMF's microwave effects on human health. PPL Electric Utilities Corporation gives the general public a watered down flyer that is dishonest and misleading. Who did PP&L pay for the study?

133. The Company objects to Complainants Set I, Interrogatory 30 because it is vague, overly broad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence as well as assumes facts not in evidence.

134. First, the interrogatory assumes facts not in evidence, including that the Company “gives the general public a watered down flyer that is dishonest and misleading.” This alleged fact is not in the record.

135. Second, the interrogatory is vague, overly broad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence. The interrogatory generally refers to “Smart Meter” but fails to specify the precise model type. Indeed, the request is not limited to the actual Landis + Gyr AMI meters that PPL Electric is deploying for its residential customers, including the Complainant. Specifically, the AMI meter that was installed

on the Complainant's property is the Landis + Gyr E350 FOCUS AXR-SD meter. Moreover, the interrogatory improperly asks the Company to provide "all technical reports and studies one related to any and all findings to include the Smart Meter radiation EMF's [sic] microwave effects on human health." PPL Electric cannot be expected to produce hundreds and possibly thousands of studies related to the study of RF radiation and health. The Company only can be reasonably expected to identify those studies upon which its witnesses have relied in forming their opinions.

136. Based on the foregoing, the interrogatory is vague, overly broad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence as well as assumes facts not in evidence.

**AA. OBJECTIONS TO INTERROGATORY 31**

137. Complainants Set I, Interrogatory 31 requests the following:

31. Was there another independent study done that PP&L is aware of?

a. If so who did the study and when?

b. Mr. Barrie Trower of the Royal Navy is a microwave expert lecturer around the world. Mr. Trower lectures on the dangers of microwave technologies, 5G, and Smart Meters and how they are harmful to humans. Mr. Trower states that in 3 generations only 1 in 8 children will be healthy. Is PP&L aware of Mr. Trower's expertise and what he is telling people around the world?

138. The Company objects to Complainants Set I, Interrogatory 31 because it is vague, is not reasonably calculated to lead to the discovery of admissible evidence, and assumes facts not in evidence.

139. First, the interrogatory assumes facts not in evidence, including all of the information about “Mr. Barrie Trower of the Royal Navy” and his alleged expertise and opinions. None of these alleged facts is in the record.

140. Second, the interrogatory is vague and not reasonably calculated to lead to the discovery of admissible evidence. The discovery request asks the Company about whether “another independent study” was performed; however, it never identifies the first “independent study” that was performed or even what that study concerned. Without this clarification, PPL Electric cannot reasonably be expected to answer the interrogatory.

141. For these reasons, the interrogatory is vague, is not reasonably calculated to lead to the discovery of admissible evidence, and assumes facts not in evidence.

**BB. OBJECTIONS TO INTERROGATORY 32**

142. Complainants Set I, Interrogatory 32 requests the following:

32. Is PP&L aware that facebook was fined 5 Billion dollars for violating their customers [sic] privacy rights?

143. The Company objects to Complainants Set I, Interrogatory 32 because it is irrelevant, is not reasonably calculated to lead to the discovery of admissible evidence, and assumes facts not in evidence.

144. First, the interrogatory assumes facts not in evidence, including that “facebook was fined 5 Billion dollars for violating their customers [sic] privacy rights.” This alleged fact is not in the record.

145. Second, the interrogatory is irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. The issues in this formal complaint proceeding are limited to whether the Company is legally required to install the new AMI meter and whether such installation would violate Section 1501 of the Public Utility Code, 66 Pa. C.S. § 1501, which

requires the Company to provide safe, reliable, and reasonable service to its customers. Facebook's treatment of customer data has nothing to do with resolving these issues.

146. Based on the foregoing, the interrogatory is irrelevant, is not reasonably calculated to lead to the discovery of admissible evidence, and assumes facts not in evidence.

**CC. OBJECTIONS TO INTERROGATORY 33**

147. Complainants Set I, Interrogatory 33 requests the following:

33. Was PP&L aware that Appliance Companies have been sued in court and had to pay damages due to their violation of customer rights to privacy. Without consent the appliance companies spied to take confidential and private information from consumers?

148. The Company objects to Complainants Set I, Interrogatory 33 because it is vague, irrelevant, is not reasonably calculated to lead to the discovery of admissible evidence, and assumes facts not in evidence.

149. First, the interrogatory assumes facts not in evidence, including that "Appliance Companies have been sued in court and had to pay damages due to their violation of customer rights to privacy" and that "[w]ithout consent the appliance companies spied to take confidential and private information from consumers." None of these alleged facts is not in the record.

150. Second, the interrogatory is irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. The issues in this formal complaint proceeding are limited to whether the Company is legally required to install the new AMI meter and whether such installation would violate Section 1501 of the Public Utility Code, 66 Pa. C.S. § 1501, which requires the Company to provide safe, reliable, and reasonable service to its customers. Unnamed "appliance companies" being sued in court and their treatment of customer data has nothing to do with resolving these issues.

151. Third, the interrogatory is vague because it never identifies the “appliance companies” to which it is referring. Without such information, it is completely unclear who these appliance companies are.

152. For these reasons, the interrogatory is vague, irrelevant, is not reasonably calculated to lead to the discovery of admissible evidence, and assumes facts not in evidence.

**DD. OBJECTIONS TO INTERROGATORY 34**

153. Complainants Set I, Interrogatory 34 requests the following:

34. PP&L cannot take private and confidential information from my home and property with the intention of selling it without my consent. What puts PP&L above the law when they use electronic surveillance? Pennsylvania has laws against unlawful surveillance to include the use of drones. Therefore, explain why PP&L is an exception to that law?

a. PP&L deems it if I have a cell or other items in my home they should be aware of them but refuse to allowing me the customer the full disclosure of all test studies that PP&L had done related to microwave technologies PP&L has the microwave studies now in their possession, not releasing that documentation is unfair and bias, Please provide all of the above studies and microwave documentations.

b. PP&L has an unfounded claim that Smart Meters are safe. As a customer I want to see the research report study and evidence or proof to substantiate the fact that the microwave technologies that PP&L is introducing into my home and onto my property are safe?

c. PP&L Smart Meter microwave technology should have a closer examination based on reports anyone can find on the internet, news papers, or TV. What is PP&L hiding that they are reluctant to release information about the PP&L Smart Meter study and the microwave technology?

d. PP&L and their attorney received numerous certified mail from me which will be considered part of this case without exception. PP&L attorneys did you make PP&L aware of all the information that you received and my

request to have PP&L to reinstall the Analog Meter to end the disagreement?

e. Please provide the name of PP&L personnel that you relayed all of the information to and their position?

154. The Company objects to Complainants Set I, Interrogatory 34 because it is vague, assumes facts not in evidence, improperly seeks a legal opinion, and improperly seeks communications protected by attorney-client privilege.

155. First, the interrogatory assumes facts not in evidence, including that the Company takes “private and confidential information” and sells it to third parties without consent, that PPL Electric engages in “electronic surveillance,” that PPL Electric’s claim that the AMI meter is safe is “unfounded,” that “Smart Meter microwave technology should have a closer examination based on reports anyone can find on the internet, news papers, or TV,” and that the Company is “hiding” information about the safety of its AMI meters from the public. None of these alleged facts is not in the record.

156. Second, the interrogatory is vague because it uses the unclear terms, such as “electronic surveillance,” “microwave technologies,” “microwave studies,” and “microwave documentations.” Without further clarification as to what information the Complainant is seeking through this interrogatory, PPL Electric cannot reasonably be expected to answer.

157. Third, subparts (d) and (e) of the interrogatory improperly seek details of communications protected by attorney-client privilege. Under Section 5.321(c) of the Commission’s regulations, the scope of discovery is limited to “any matter, not privileged, which is relevant to the subject matter involved in the pending action.” 52 Pa. Code § 5.321(c) (emphasis added). Similarly, Section 333(d) of the Public Utility Code states that “[a]ny party to a proceeding may serve written interrogatories upon any other party for purposes of discovering relevant, unprivileged information.” 66 Pa. C.S. § 333(d) (emphasis added). Here, the

Complainant is specifically requesting information about communications between the Company and its attorneys about issues raised in the instant legal matter. Such communications are protected by attorney-client privilege and not discoverable. *See* 42 Pa. C.S. § 5928 (“In a civil matter counsel shall not be competent or permitted to testify to confidential communications made to him by his client, nor shall the client be compelled to disclose the same, unless in either case this privilege is waived upon the trial by the client.”).

158. Fourth, the discovery request improperly seeks a legal opinion. The Company’s witnesses are not lawyers who can provide legal opinions. Further, discovery is intended for the discovery of facts and evidence that may be presented at the evidentiary hearing, not the legal opinions of the Company’s attorneys that are protected by attorney-client privilege and the attorney work product doctrine. Rather, PPL Electric’s legal arguments will be set forth in its closing argument and its briefs, if any, that are submitted in this proceeding.

159. For these reasons, the interrogatory is vague, assumes facts not in evidence, improperly seeks a legal opinion, and improperly seeks communications protected by attorney-client privilege.

**EE. OBJECTIONS TO INTERROGATORY 35**

160. Complainants Set I, Interrogatory 35 requests the following:

35. PP&L knows that EMF's frequencies emitted from the Smart Meters are harmful to humans. Why is PP&L attempting hide the facts and force it upon the general public that were not made aware of the Smart Meters danger or the surveillance capability built into the Smart Meter?

161. The Company objects to Complainants Set I, Interrogatory 35 because it is vague, speculative, and not reasonably calculated to lead to the discovery of admissible evidence and assumes facts not in evidence.

162. First, the interrogatory assumes facts not in evidence, including that the Company allegedly “knows that EMF’s frequencies emitted from the Smart Meters are harmful to humans” and that PPL Electric allegedly is “attempting [to] hide the facts and force it upon the general public,” and that the AMI meters allegedly are a “danger” and have “surveillance capability.” None of these alleged facts is in the record.

163. Second, the interrogatory is vague, speculative, and not reasonably calculated to lead to the discovery of admissible evidence. The discovery request uses the vague term “surveillance capability” and speculates that the AMI meters are a “danger” to the public. Additionally, the interrogatory generally refers to “Smart Meters” but fails to specify the precise model type. Indeed, the request is not limited to the actual Landis + Gyr AMI meters that PPL Electric is deploying for its residential customers, including the Complainant. Specifically, the AMI meter that was installed on the Complainant’s property is the Landis + Gyr E350 FOCUS AXR-SD meter.

164. Based on the foregoing, the interrogatory is vague, speculative, and not reasonably calculated to lead to the discovery of admissible evidence and assumes facts not in evidence.

**FF. OBJECTIONS TO INTERROGATORY 36**

165. Complainants Set I, Interrogatory 36 requests the following:

36. Did PP&L tell its attorneys and the general public the whole truth about the many health problems that are associated with EMF radiation?

166. The Company objects to Complainants Set I, Interrogatory 36 because it is vague, assumes facts not in evidence, and improperly seeks communications protected by attorney-client privilege.

167. First, the interrogatory assumes facts not in evidence, including that “many health problems” are allegedly “associated with EMF radiation.” This alleged fact is not in the record.

168. Second, the interrogatory uses the vague term “health problems” and completely fails to provide details on what those specific “health problems” are. Without such clarification, PPL Electric cannot reasonably be expected to answer the interrogatory.

169. Third, the interrogatory improperly seek details of communications protected by attorney-client privilege. Under Section 5.321(c) of the Commission’s regulations, the scope of discovery is limited to “any matter, not privileged, which is relevant to the subject matter involved in the pending action.” 52 Pa. Code § 5.321(c) (emphasis added). Similarly, Section 333(d) of the Public Utility Code states that “[a]ny party to a proceeding may serve written interrogatories upon any other party for purposes of discovering relevant, unprivileged information.” 66 Pa. C.S. § 333(d) (emphasis added). Here, the Complainant is specifically requesting information about communications between the Company and its attorneys about issues raised in the instant legal matter. Such communications are protected by attorney-client privilege and not discoverable. *See* 42 Pa. C.S. § 5928 (“In a civil matter counsel shall not be competent or permitted to testify to confidential communications made to him by his client, nor shall the client be compelled to disclose the same, unless in either case this privilege is waived upon the trial by the client.”).

170. For these reasons, the interrogatory is vague, assumes facts not in evidence, and improperly seeks communications protected by attorney-client privilege.

#### **GG. OBJECTIONS TO INTERROGATORY 37**

171. Complainants Set I, Interrogatory 37 requests the following:

37. Is PP&L aware that all over our Country, the United States of America, and the around the world that people see the Smart

Meters as harmful and don't want it on their property so why should I?

172. The Company objects to Complainants Set I, Interrogatory 37 because it is vague, speculative, irrelevant, and not reasonably calculated to lead to the discovery of admissible evidence and assumes facts not in evidence.

173. First, the interrogatory assumes facts not in evidence, including that “all over our Country, the United States of America, and the around the world that people see the Smart Meters as harmful and don’t want it on their property.” This alleged fact is not in the record.

174. Second, the interrogatory is vague, speculative, irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. The discovery request uses the vague term “harmful.” Additionally, the interrogatory generally refers to “Smart Meters” but fails to specify the precise model type. Indeed, the request is not limited to the actual Landis + Gyr AMI meters that PPL Electric is deploying for its residential customers, including the Complainant. Specifically, the AMI meter that was installed on the Complainant’s property is the Landis + Gyr E350 FOCUS AXR-SD meter. Moreover, the issues in this formal complaint proceeding are limited to whether the Company is legally required to install the new AMI meter and whether such installation would violate Section 1501 of the Public Utility Code, 66 Pa. C.S. § 1501, which requires the Company to provide safe, reliable, and reasonable service to its customers. The fact that other unnamed people may oppose the installation of the new AMI meters has nothing to do with the resolution of these issues.

175. Based on the foregoing, the interrogatory is vague, speculative, irrelevant, and not reasonably calculated to lead to the discovery of admissible evidence and assumes facts not in evidence.

**HH. OBJECTIONS TO INTERROGATORY 38**

176. Complainants Set I, Interrogatory 38 requests the following:

38. PP&L Smart Meters are operating their microwave technology EMF's over my copper wiring throughout my home without prior permission or consent. When did I tell PP&L that they can use my house wiring for surveillance upon me?

a. What legal grounds did PP&L have to install microwave technology that was operating throughout my home and off of my homes copper wiring without permission?

b. In the past I purchased clean electricity from PP&L with the understanding that the purchase was to be without any other compensation to PP&L or that they can use my home and property for additional money. What right did PP&L have to change the initial agreement?

c. PP&L is now providing me with unsafe microwave EMF's and dirty electric on my property and making an additional profit off of me. How is that legal?

d. PP&L has always maintained that they were responsible up to the electric utility pole and Meter utility box (only).

PP&L has always maintained that from the pole on PP&L had no jurisdiction whatsoever to make any repairs. PP&L always maintained that from the pole on it was the home owner's responsibility not PP&L's. PP&L for as long as I can remember has always recognized that my home and wiring was out of their control and they had no authority whatsoever after the pole and meter. I want to know how that changed and now PP&L, without consent, can take it upon themselves to now insist that they have a right to use my home or property for their convenience and profit off of it without compensation to the homeowner?

e. I never intended for our home wiring to be used by PP&L for search, seizure or surveillance of my personal information. PP&L never paid for the wiring, its installation nor has PP&L ever maintained any electric component in my home to include the breaker box. Please explain how PP&L can illegally make a seizure of my personal property and to profit from it by just putting in an unsafe Smart Meter on my property as if they own the

property, house and the components in it? What happen to our rights?

f. I had recently replaced circuit breakers, wiring and other electrical components in my home. Since PP&L is making claim to the copper wiring, etc., is PP&L going to compensate me for any upgrade or repairs since PP&L is using the components?

177. The Company objects to Complainants Set I, Interrogatory 38 because it is vague, speculative, irrelevant, and not reasonably calculated to lead to the discovery of admissible evidence as well as assumes facts not in evidence and improperly seeks a legal opinion.

178. First, the interrogatory assumes facts not in evidence, including that PPL Electric's AMI meters are allegedly "operating their microwave technology EMF's over [the Complainant's] copper wiring throughout [her] home," that the Company allegedly uses the Complainant's "house wiring for surveillance," that the Company is now using the Complainant's hoe and property for additional money," that PPL Electric allegedly "is now providing [the Complainant] with unsafe microwave EMF's and dirty electric on [the Complainant's] property and making an additional profit off of [her]," and that the AMI meter is producing "unsafe microwave EMF's [sic] and dirty electric[ity]." Moreover, the interrogatory claims that PPL Electric is seizing the Complainant's personal property and conducted surveillance. The request also includes averments about the installation and replacement of wireless and other electrical equipment in the Complainant's home. None of these alleged facts is in the record.

179. Second, the interrogatory is vague, speculative, irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. The interrogatory never specifies how the Company is "making claim" to the Complainant's "copper wiring" and speculates that the AMI meter produces "unsafe" levels of RF fields. Additionally, the interrogatory generally

refers to “Smart Meters” but fails to specify the precise model type. Indeed, the request is not limited to the actual Landis + Gyr AMI meters that PPL Electric is deploying for its residential customers, including the Complainant. Specifically, the AMI meter that was installed on the Complainant’s property is the Landis + Gyr E350 FOCUS AXR-SD meter. Moreover, the issues in this formal complaint proceeding are limited to whether the Company is legally required to install the new AMI meter and whether such installation would violate Section 1501 of the Public Utility Code, 66 Pa. C.S. § 1501, which requires the Company to provide safe, reliable, and reasonable service to its customers. The Complainant’s inquiry as to the Company’s willingness to compensate the Complainant “for any upgrade or repairs” is completely irrelevant to resolving these issues.

180. Third, subparts (a) through (e) improperly seek a legal opinion. The Company’s witnesses are not lawyers who can provide legal opinions. Further, discovery is intended for the discovery of facts and evidence that may be presented at the evidentiary hearing, not the legal opinions of the Company’s attorneys that are protected by attorney-client privilege and the attorney work product doctrine. Rather, PPL Electric’s legal arguments will be set forth in its closing argument and its briefs, if any, that are submitted in this proceeding.

181. For these reasons, the interrogatory is vague, speculative, irrelevant, and not reasonably calculated to lead to the discovery of admissible evidence as well as assumes facts not in evidence and improperly seeks a legal opinion.

## **II. OBJECTIONS TO INTERROGATORY 39**

182. Complainants Set I, Interrogatory 39 requests the following:

39. PP&L has been Fraudulent in how they marketed their Smart Meter and misled the public into thinking that the Smart Meters were safe. Customers weren't made aware that the Smart Meters would gather information from their homes and that a profile of each household could be made and give it to whoever PP&L wish.

Why weren't Pennsylvania customers made aware of the larger scope of the operation that PP&L is engaging in?

a. Please provide me with a copy of all literature that PP&L has provided to the public informing them of how PP&L would be using the customer's home wiring or other components that belongs the property owner?

b. When PP&L sells information that they gather from the customer's home what input or say does a customer have to their private information or how it is to be distributed?

c. Will the information be sold to foreign countries or overseas buyers?

183. The Company objects to Complainants Set I, Interrogatory 39 because it is vague, overly broad, unduly burdensome, irrelevant, and not reasonably calculated to lead to the discovery of admissible evidence as well as assumes facts not in evidence.

184. First, the interrogatory assumes facts not in evidence, including that PPL Electric allegedly "has been Fraudulent" in its marketing of the AMI meters and "misled the public into thinking that the Smart Meters were safe," that the Company allegedly will "gather information from [customers'] homes," that the Company allegedly could create "a profile of each household" and distribute it to whomever PPL Electric wants, and that PPL Electric allegedly sells customer's information collected through the AMI meter to third parties. None of these alleged facts is in the record.

185. Second, the interrogatory is vague, speculative, irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. The interrogatory never specifies how the Company is "using the customer's home wiring or other components." Further, the scope of the instant Complaint is limited to the deployment of the new AMI meter on the Complainant's property. The Complainant does not have standing to represent the interests of every other PPL Electric customer. Moreover, in subpart (c), the interrogatory never specifies

what “information” is allegedly may be “sold to foreign countries or overseas buyers.” Additionally, the interrogatory generally refers to “Smart Meters” but fails to specify the precise model type. Indeed, the request is not limited to the actual Landis + Gyr AMI meters that PPL Electric is deploying for its residential customers, including the Complainant. Specifically, the AMI meter that was installed on the Complainant’s property is the Landis + Gyr E350 FOCUS AXR-SD meter.

186. In addition, the issues in this formal complaint proceeding are limited to whether the Company is legally required to install the new AMI meter and whether such installation would violate Section 1501 of the Public Utility Code, 66 Pa. C.S. § 1501, which requires the Company to provide safe, reliable, and reasonable service to its customers. Therefore, it is completely irrelevant for the Complainant to request the Company’s “literature” about any ways in which the Company may “be using the customer’s home wiring or other components” because such documents are completely unrelated to the AMI meters. Also, subpart (a) has no limitation in temporal scope, so the Company would have to review all of its documentation since the inception of the Company to see if it is responsive to this request for “literature.”

187. Based on the foregoing, the interrogatory is vague, overly broad, unduly burdensome, irrelevant, and not reasonably calculated to lead to the discovery of admissible evidence as well as assumes facts not in evidence.

**JJ. OBJECTIONS TO INTERROGATORY 40**

188. Complainants Set I, Interrogatory 40 requests the following:

40. When was PP&L or any company, corporation, or state government granted the right to violate my Constitutional rights and requirements under the law of due process and protection of my fundamental rights to freedom and privacy under the law?

189. The Company objects to Complainants Set I, Interrogatory 40 because it is irrelevant, is not reasonably calculated to lead to the discovery of admissible evidence, and improperly seeks a legal opinion.

190. First, the interrogatory is irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. The issues in this formal complaint proceeding are limited to whether the Company is legally required to install the new AMI meter and whether such installation would violate Section 1501 of the Public Utility Code, 66 Pa. C.S. § 1501, which requires the Company to provide safe, reliable, and reasonable service to its customers. Therefore, it is completely irrelevant for the Complainant to request information about any other company, any other corporation, or any state government.

191. Second, the interrogatory improperly seeks a legal opinion. The Company's witnesses are not lawyers who can provide legal opinions. Further, discovery is intended for the discovery of facts and evidence that may be presented at the evidentiary hearing, not the legal opinions of the Company's attorneys that are protected by attorney-client privilege and the attorney work product doctrine. Rather, PPL Electric's legal arguments will be set forth in its closing argument and its briefs, if any, that are submitted in this proceeding.

192. For these reasons, the interrogatory is irrelevant, is not reasonably calculated to lead to the discovery of admissible evidence, and improperly seeks a legal opinion.

**KK. OBJECTIONS TO INTERROGATORY 41**

193. Complainants Set I, Interrogatory 41 requests the following:

41. I believe that PP&L Smart Meter microwave technology is a danger to me and my families' health. Smart Meter danger has been recognize [sic] both in this county and around world as being an especially dangerous and harmful device. PP&L Smart Meter also has spyware or surveillance technology built in it that has no other definition other then [sic] an invasion of our privacy and liberties. PP&L has taken away information from within my home

and off of my property that they have no legal right to. The question is under what judicial or administration of the law does PP&L have to bypass my constitutional rights?

a. Supply all documentation showing me how PP&L can take control of my property and disregard my Constitutional rights and other legal rights so they could install a Smart Meter?

194. The Company objects to Complainants Set I, Interrogatory 41 because it is vague, speculative, overly broad, and unduly burdensome as well as assumes facts not in evidence and improperly seeks a legal opinion.

195. First, the interrogatory assumes facts not in evidence, including that the new AMI meter's "microwave technology is a danger," that "Smart Meter danger has been recognize[d] both in this country and around [the] world," that the new AMI meter "has spyware or surveillance technology built in," and that PPL Electric has allegedly taken the Complainant's information without authorization. None of these alleged facts is in the record.

196. Second, the interrogatory is vague and speculative. The discovery request uses the vague terms "microwave technology," "spyware," and "surveillance technology" and speculates that the AMI meters are "dangerous and harmful device[s]." Additionally, the interrogatory generally refers to "Smart Meter" but fails to specify the precise model type. Indeed, the request is not limited to the actual Landis + Gyr AMI meters that PPL Electric is deploying for its residential customers, including the Complainant. Specifically, the AMI meter that was installed on the Complainant's property is the Landis + Gyr E350 FOCUS AXR-SD meter.

197. Third, subpart (a) of the interrogatory is overly broad and unduly burdensome because it asks the Company to "[s]upply all documentation showing [the Complainant] how PP&L can take control of [her] property." Even if this allegation about PPL Electric taking

control of the Complainant's property were true, which it is not, PPL Electric cannot reasonably be expected to produce "all documentation" in existence relating to that position. Rather, the Company only can be reasonably expected to produce the documentation upon which it relied in support of its position.

198. Fourth, the interrogatory improperly seeks a legal opinion. The Company's witnesses are not lawyers who can provide legal opinions. Further, discovery is intended for the discovery of facts and evidence that may be presented at the evidentiary hearing, not the legal opinions of the Company's attorneys that are protected by attorney-client privilege and the attorney work product doctrine. Rather, PPL Electric's legal arguments will be set forth in its closing argument and its briefs, if any, that are submitted in this proceeding.

199. Based on the foregoing, the interrogatory is vague, speculative, overly broad, and unduly burdensome as well as assumes facts not in evidence and improperly seeks a legal opinion.

**LL. OBJECTIONS TO INTERROGATORY 42**

200. Complainants Set I, Interrogatory 42 requests the following:

42. Initially there was an opt-out from the Smart Meter for Pennsylvania customers. Please provide information clarifying how the opt-out option was terminated and the mandatory installation of the Smart Meter was instituted?

201. The Company objects to Complainants Set I, Interrogatory 42 because it assumes facts not in evidence and improperly seeks a legal opinion.

202. First, the interrogatory assumes facts not in evidence, namely that "[i]nitially there was an opt-out from the Smart Meter for Pennsylvania customers." However, this alleged fact is not in the record.

203. Second, the interrogatory improperly seeks a legal opinion. The Company's witnesses are not lawyers who can provide legal opinions. Further, discovery is intended for the discovery of facts and evidence that may be presented at the evidentiary hearing, not the legal opinions of the Company's attorneys that are protected by attorney-client privilege and the attorney work product doctrine. Rather, PPL Electric's legal arguments will be set forth in its closing argument and its briefs, if any, that are submitted in this proceeding.

204. For these reasons, the interrogatory assumes facts not in evidence and improperly seeks a legal opinion.

**MM. OBJECTIONS TO INTERROGATORY 43**

205. Complainants Set I, Interrogatory 43 requests the following:

43. PP&L has failed to provide me and other Pennsylvania customers with a clear and full explanation of what radiation damage and harm to ones [sic] health could be caused by their Smart Meter. Other electrical components sold on the open market give a clear warning of any danger that their equipment such as laptop computers, cell phones, wifi equipment, microwaves and any other device that use EMF technology should be used with caution. PP&L is well aware that the above mentioned equipment can be turned off on demand unlike PP&L's Smart Meter. PP&L's Smart Meter is in operation mode 24 hours a day, 7 days a week, 365 days a year which makes PP&L's Smart Meter more dangerous considering there is no way or device to terminate the Smart Meter's microwave EMF technology that is continuously going throughout our home. Why hasn't PP&L provided all Pennsylvania customers with the fact that there could be a danger related with the PP&L Smart Meter?

PP&L and their Attorney have received certified mail related to this fact. Please review the certified mail that you received.

206. The Company objects to Complainants Set I, Interrogatory 43 because it is vague, speculative, overly broad, irrelevant, and not reasonably calculated to lead to the discovery of admissible evidence as well as assumes facts not in evidence.

207. First, the interrogatory assumes facts not in evidence, including that the new AMI meter can cause “radiation damage and harm to ones [sic] health,” that “[o]ther electrical components sold on the open market give a clear warning of any danger that their equipment such as laptop computers, cell phones, wifi equipment, microwaves and any other device that use EMF technology should be used with caution,” and that PPL Electric’s AMI meter “is in operation mode 24 hours a day, 7 days a week, 365 days a year” and makes it “more dangerous.” None of these alleged facts is in the record.

208. Second, the interrogatory is vague and speculative. The discovery request speculates that the AMI meters cause unspecified “radiation damage” and “harm” and, therefore, are “danger.” Additionally, the interrogatory generally refers to “Smart Meter” but fails to specify the precise model type. Indeed, the request is not limited to the actual Landis + Gyr AMI meters that PPL Electric is deploying for its residential customers, including the Complainant. Specifically, the AMI meter that was installed on the Complainant’s property is the Landis + Gyr E350 FOCUS AXR-SD meter.

209. Third, the interrogatory is overly broad, irrelevant, and not reasonably calculated to lead to the discovery of admissible evidence because it seeks details about the information provided to “other Pennsylvania customers.” The scope of the instant Complaint is limited to the deployment of the new AMI meter on the Complainant’s property. The Complainant does not have standing to represent the interests of every other PPL Electric customer.

210. Based on the foregoing, the interrogatory is vague, speculative, overly broad, irrelevant, and not reasonably calculated to lead to the discovery of admissible evidence as well as assumes facts not in evidence.

**NN. OBJECTIONS TO INTERROGATORY 44**

211. Complainants Set I, Interrogatory 44 requests the following:

44. It is further my understanding that the Smart Meter lacks a safety device to prevent an overload or short in the meter that could cause an electrical fire. The fact that the Smart Meter can cause fires is well documented. The question is why PP&L has been so reluctant to make all the facts concerning the Smart Meters danger public and a warning provided?

212. The Company objects to Complainants Set I, Interrogatory 44 because it is vague, is speculative, and assumes facts not in evidence.

213. First, the interrogatory assumes facts not in evidence, including that the new AMI meter “lacks safety device to prevent an overload or short in the meter that could cause an electrical fire,” that the AMI meter “can cause fires,” and that the AMI meters are a “danger” to the public. None of these alleged facts is in the record.

214. Second, the interrogatory is vague and speculative. The discovery request claims that the AMI meters cause unspecified “fires,” “overload[s],” or “short[s]” in unspecified situations and, as a result, speculates the AMI meter is a “danger.” Additionally, the interrogatory generally refers to “Smart Meter” but fails to specify the precise model type. Indeed, the request is not limited to the actual Landis + Gyr AMI meters that PPL Electric is deploying for its residential customers, including the Complainant. Specifically, the AMI meter that was installed on the Complainant’s property is the Landis + Gyr E350 FOCUS AXR-SD meter.

215. For these reasons, the interrogatory is vague, is speculative, and assumes facts not in evidence.

## **II. CONCLUSION**

WHEREFORE, PPL Electric Utilities Corporation objects to Complainants Set I, Definitions 2 and 4-21 and Interrogatories 3-6, 10-13, and 15-44 on the grounds that they are vague, overly broad, unduly burdensome, speculative, unintelligible, irrelevant, and not reasonably calculated to lead to the discovery of admissible evidence as well as assume facts not in evidence, improperly seek a legal opinion, improperly seek communications and materials protected by attorney-client privilege and attorney work product doctrine, and/or seek highly confidential cybersecurity information. Moreover, PPL Electric reserves the right to object to future interrogatories, requests for admissions, and requests for production of documents, including any instructions and definitions contained therein.

Respectfully submitted,



Kimberly A. Klock (ID # 89716)  
Michael J. Shafer (ID # 205681)  
PPL Services Corporation  
Two North Ninth Street  
Allentown, PA 18101  
Phone: 610-774-2599  
Fax: 610-774-4102  
E-mail: [kklock@pplweb.com](mailto:kklock@pplweb.com)  
[mjshafer@pplweb.com](mailto:mjshafer@pplweb.com)

Devin T. Ryan (ID # 316602)  
Garrett P. Lent (ID # 321566)  
Post & Schell, P.C.  
17 North Second Street, 12th Floor  
Harrisburg, PA 17101-1601  
Phone: 717-731-1970  
Fax: 717-731-1985  
E-mail: [dryan@postschell.com](mailto:dryan@postschell.com)  
[glent@postschell.com](mailto:glent@postschell.com)

Curtis S. Renner (ID # 326488)  
Watson & Renner  
1901 Pennsylvania Avenue, NW  
Suite 1005 - ENS  
Washington, DC 20006  
Phone: 202-737-6302  
E-mail: [crenner@w-r.com](mailto:crenner@w-r.com)

Date: July 30, 2019

Attorneys for PPL Electric Utilities Corporation

**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 EMAIL & FIRST CLASS MAIL**

Dana Brennan  
16 Oslo Way  
Newfoundland, PA 18445  
jndbrennan@gmail.com

Date: July 30, 2019



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Devin T. Ryan

# APPENDIX “C”

**D** Dana Brennan  
16 Oslo Way  
Newfoundland, PA 18445



7018 3090 0001 4310 0690

Devin Ryan  
Post & Schell  
17 North 2nd St.  
12th Floor  
Harrisburg, PA 17101-1601



1000



17101

U.S. POSTAGE PAID  
FORM LETTER  
NEWFOUNDLAND, PA  
18445  
AUG 12, 19  
AMOUNT  
**\$7.00**  
R2A05K140063-33

**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 EMAIL & FIRST CLASS MAIL**

Dana Brennan  
16 Oslo Way  
Newfoundland, PA 18445  
jndbrennan@gmail.com

Date: August 20, 2019



Devin T. Ryan