

**John M. Chenosky, PE**  
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June 16, 2019

First Class Mail

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

Jeffrey A. Watson, Adm. Law Judge  
Pennsylvania Public Utility Commission  
Piatt Place, Suite 220  
301 Fifth Avenue  
Pittsburgh, PA 15222

**RE: John M. Chenosky v. Metropolitan Edison Company**  
**Docket No. C-2019-3007622**

Dear Secretary Chiavetta & Judge Watson:

Enclosed please find Objections to Defendant Metropolitan Edison's Motion to Compel dated July 29, 2019.

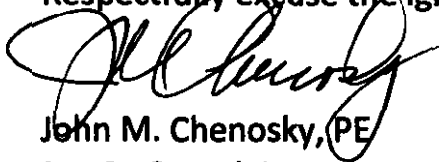
Also enclosed is a Motion to Dismiss Defendant's Motion to Compel is requested.

Additionally a Motion to Dismiss Defendant's Interrogatories Set 1 dated May 16, 2019 is also requested.

Finally a request for an extended Continuance is requested as explained in the attachment.

Please contact me if you any questions regarding any of the specifics listed above.

Respectfully excuse the ignorant violations of protocol and procedure,



John M. Chenosky, PE  
Pro Se Complainant  
Enclosures  
cc: As per COS

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BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

JOHN M. CHENOSKY

v.

METROPOLITAN EDISON COMPANY

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Docket No. C-2019-3007622

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**OBJECTIONS TO METROPOLITAN EDISON COMPANY MOTION TO COMPEL OF JULY 29,2019 AND MOTION TO DISMISS INTERROGATORIES OF MAY 16,2019 AND MOTION TO DISMISS MOTION TO COMPEL OF JULY 29,2019 ALL AS SUBMITTED BY DEFENDANT METROPOLITAN EDISON COMPANY**

As per the August 1, 2019 email to all parties, Complainant has made a cursory inspection of the Motion to Compel submitted by the Defendant July 29, 2019 which was received on August 2, 2019. Complainant is requesting a Continuance, the justification of which will become apparent.

Complainant's position is that the timeframe demanded by the Defendant represents a major hardship. The allegations advanced by the Defendant have no merit, nor do they have any relevance as previously sited in the ATI. Consequently, Complainant is forced to object to the Motion to Compel in its entirety.

Procedural issues are addressed herewith:

Complainant is requesting a *Motion to Dismiss Interrogatories of May 16, 2019 and Dismiss the Motion to Compel of July 29, 2019*. Defendant denies or fails to rebut the Complainant's evidence that serious fire and explosion risks are posed by their implementation of combustible/explosive Smart Meters, as stipulated in Answer to Set I Interrogatories, and further;

Defendant's denial of Biological Impacts of Smart Meters and their forced implementation are a violation of the Nuremberg Protocol, United States Common Rule 45CFR part 46 and EPA Order 1000.17 amounts to Defendant's conducting involuntary human experiments. These rules exist solely to protect the safety of human subjects from dangerous experimentation and despite the preponderance of the body of evidence reported by the Bio-Initiative Report, ATI Exhibit 2 a-h, and expert witness testimony by Dr. Andrew A. Marino, including Exhibits 1&2 and copious authored books, papers, abstracts, charts, CV, etc. produced in evidence in the following consolidated PA PUC proceedings, ( but not included in printed form here as they are already in evidence ) has ignored the risks to human subjects. Proceedings are as follows:

- Provance v. PECO Energy Company, Docket No. C-2015-2475023
- Randal and Albrecht v. PECO Energy Company, Docket No. C-2016-2537666
- Murphy v. PECO Energy Company, Docket No. C-2015-2475726
- Van Schoyk v. PECO Energy Company, Docket No. C-2015-2475726 ( Dismissed / Withdrawn )

In his testimony, p.54, Dr. Marino concluded... "that there is a reasonable basis in established science for the Complainants' concern regarding risks to human health caused by man-made electromagnetic radiation", and further....p.56... " PECO has claimed that expert committees have pronounced smart meters safe, but PECO has not acknowledged the blatant conflicts-of-interests that infect such committees, nor the serious limitation of their reports, such as the failure to address much of the relevant literature". As indicated in Item 21 of Objections of Interrogatories, that statement reinforces Complainant's position..." The Industry, by the *Denial of Published Factual Information, is guilty of "Acquiescence by Silence"*.

As Dr. Marino concluded,.... that Complainant's are forced by the Utility (PECO) into the impossible position of conducting experiments on themselves to prove claims of a link between their symptoms and EMF from Smart Meters were sufficiently credible as to warrant some remedial action by the Utility ( PECO ).

When considering a Pro Se Complainant's perspective:

Paraphrasing from the PA PUC website... " Pro Se Participants ..."create special problems for ALJs....ALUs should explain the process....etc." which from Complainant's experience, if it occurred, it was not obvious. The mere matter of referring a Pro Se Complainant to the un-user friendly PA PUC website without direction, especially when the request for a Disability Accommodation was requested in numerous documents is in a word, disturbing. The lack of action by all entities suggests that the only way an Accommodation would be forthcoming is to file numerous Formal ADA "Grievance for Denial of Accommodation" complaints. Complainant's diagnosed and documented Anomic and Expressive Aphasia, is a Permanent Disability from several left parietal cerebral accidents and will be supported in positive Grievance Reliefs.

The Complainant has spent the last 27 years in this Medical Wonderland that we lovingly refer to as the US Health Care System and has accumulated almost two Banker's Box records filled with doctor visit reports, hospital stays, and extensive testing on a routine basis. If that information were reduced to electronic records it could be substantial and not lend itself to email transfer. In fact Complainant has undergone the last 10 months in Emergency Room, Out-Patient non-invasive testing in order to secure a diagnosis of his current unresolved issue, and had an Echocardiogram on Tuesday ( August 6, 2019 ) and the 45 minute EMF-induced radiation resulted in a significant migraine and excessive painful body cramping. A follow-up Doctor visit is scheduled on August 14, 2019. To begin to submit any extensive information is a hardship, time consuming effort, as well as a violation of Complainant's HIPPA rights.

As an example of the numerous irrelevant questions included a request for Cell (Smart Phone) bills, which are non-existent, or mailed. The phones are used when Defendant has reportable power outages, used sparingly when traveling and are in "airplane mode" when not in service to avoid EMF radiation exposure.

Have we lost sight of the fact that this is Complaint about two (2) meters? Pennsylvania and DC are the only OPT-IN jurisdictions in the USA with over 50% of States have OPT-OUT Legislation of Smart Meters.

This experiment in energy rationing caused by Federal & State (PA) policy mistakes in Energy Generation and Distribution, due to disruptive Renewable Priorities, forcing Utilities to pay for these imbalances in the GRID. The Smart Meters with their ability to recapture these costs from ratepayers will result in enormous increases in Ratepayer Bills hurting the most vulnerable, i.e., Senior, Indigent and other fixed income residents. Those 24/7 individuals that depend on continuous service will be most affected.

As indicated previously, Complainant is a Registered Professional Engineer in the State of Pennsylvania. Based upon the limited information provided by the PA PUC, the Defendant and other Industry Players, there has never been any Independent Registered Pennsylvania Professional Engineer "Sealed" Study used

as a final draft report used as basis for implementation of Act 129, to insure the " SAFETY, HEALTH & WELFARE OF THE PUBLIC".

In Complainant's opinion the implementation of a 5G System on top of this Smart Meter network will have monumental negative consequences and needs considerably more review before the public is willing to accept the risks.

The most fundamental canon of the Practice of the Professional Engineering is to hold paramount the safety, health & welfare of the public. And since the Complainant and his spouse last looked, they were members of the general public. Not only does the Complainant have legal obligation to bring forth his findings of serious technical deficiencies of Smart Meters that results in fires & explosions and serious health implications to the attention to regulating authorities, Complainant has an obligation to himself and his spouse. Why institute laws obligating Professional Engineers when Pennsylvania's Agencies and Utilities they oversee are not following the same precepts?

Given the fact that in:

Commonwealth Court of Pennsylvania  
Antonio Romeo v Pennsylvania Public Utility Commission, Respondent  
No. 498 C. D. 2016  
Decided February 08, 2017,

The Court...."we now affirm, in part, reverse in part, and remand for further proceedings the order is REVERSED to the extent that it sustained PECO...preliminary objection based on legal insufficiency and dismissed Petitioner Antonio Romeo's claim that smart meters present a health and safety concern. This matter REMANDED to the Commission for proceeding consistent with the opinion."

Additionally at least two of the above Dockets have apparently been appealed to the Commonwealth Court and combined into one. Unfortunately Complainant has unable to site the appropriate information except it would appear Petitioners' Attorney is Steve Harvey, Esq. from Philadelphia.

Given the circumstances cited above, it might seem prudent for the ALJ to allow an extended continuance giving the Legislature an opportunity to correct this matter or, the appeals should be allowed to run their course with the results providing further direction to this Docket.

Complainant is amenable to a Pre-Conference hearing to discuss the deficiencies of the process which results in the ignorance of Pro Se Complainants, the lack of Accommodation For Disability required by ADA Compliance, the preponderance of the evidence that Smart Meter Technology and its 5G future is a Fire Risk nor, Biologically Safe and that is overwhelmingly ignored by both the PA PUC and the Defendant. These deficiencies are finally becoming evident as Proceedings Pending Appeal are revealing.

In Complainant's past Professional Engineering career he insisted on truth in science, established peer-reviewed studies, critical thinking, cost-benefit analysis and time in making engineering decisions and would respectfully suggest that these additional benchmarks be added to this legal process moving forward.

Respectfully,

  
John M. Chenosky, PE

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BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

PA P.U.C.  
SECRET **John M. Chenosky**

v.

Docket No. C-2019-3007622

**Metropolitan Edison Company**

**CERTIFICATE OF SERVICE**

I hereby certify that I have this day served Defendant Metropolitan Edison Company a true copy of Objections to Defendant's Motion to Compel, dated July 29, 2019. Additionally I have served Defendant the Complainant's Motion to Dismiss Interrogatories Set 1, dated May 16, 2019 and Complainant's Motion to Dismiss Defendant's Motion to Compel dated July 29, 2019. Additionally an extended Continuance is requested as fully explained in the Objections and Motions to Dismiss.

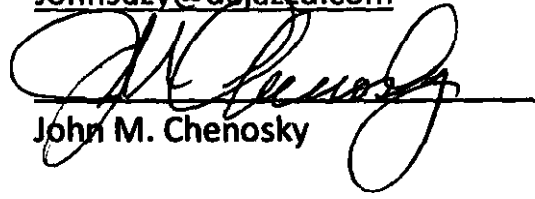
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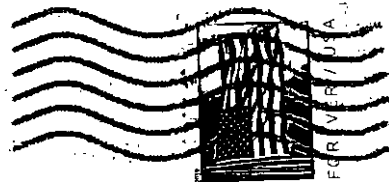
John M. Chenosky

Date: August 16, 2019

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