

Jeffrey W. Arndt
4141 Fundistown Road
Trafford, PA 15085

August 25th, 2019

Via Electronic Filing and First Class Mail

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

RE: Jeffrey W. Arndt v. Duquesne Light Company
Docket No. C-2018-3003482

Dear Secretary Chiavetta:

Please E-File this letter and Certificate of Service in the above referenced docket number noting that the Supplemental Responses to Duquesne Light's First Set of Discovery Requests in the above-referenced proceeding. Copies will be provided as indicated on the Certificate of Service.

Respectfully Submitted,



Jeffrey W. Arndt

Enclosure

C: Jeremy Farrell and Paul Shane Miller (with enclosure)
ALJ Jeffrey Watson (with enclosure)

CERTIFICATE OF SERVICE

I, Jeffrey W. Arndt, hereby certify that a true and correct copy of my supplemental responses to Duquesne Light's First Set of Discovery Requests of Jeffrey W. Arndt's Amended Formal Complaint has been served upon the following in the manner indicated, in accordance with the requirements of 52 Pa Code, Section 1.54 (relating to service by a participant).

Via First Class Mail

Council of record for Duquesne Light Company:

Jeremy V. Farrell, Esquire

PA I.D. No. 316258

(412) 594-3938

jfarrell@tuckerlaw.com

1500 One PPG Place

Pittsburgh, PA 15222

Paul Shane Miller, Esquire

PA I.D. No. 319174

(412) 594-5503

smiller@tuckerlaw.com

Via First Class Mail

Administrative Law Judge:

Judge Jeffrey Watson

Pennsylvania Public Utility Commission

Office of Administrative Law Judge

Piatt Place, Suite 220

301 Fifth Avenue

Pittsburgh, PA 15222

Dated: August 25, 2019



Jeffrey W. Arndt

4141 Fundistown Road

Trafford, PA 15085

(412) 334-6391

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

JEFFREY W. ARNDT,	:	
	:	
Complainant,	:	
	:	
vs.	:	No: C-2018-3003482
	:	
DUQUESNE LIGHT COMPANY,	:	
	:	
Respondent.	:	

Supplemental Responses to Duquesne Light’s First Set of Discovery Requests

Duquesne Light to Complainant-

2. Produce all Documents, including but not limited to hospital and/or medical records and studies, that relate to Your answer to Discovery Request No. 1.

ANSWER:

I do not have records responsive to your request, simply because they do not exist. As I have stated numerous times before, I am not claiming health conditions from the installation of a smart meter, nor have I visited a doctor due to adverse reactions from the installation of a smart meter since we do **not** have a smart meter. The Formal Complaint I sent in states “I am concerned it **may** cause an adverse effect on my health and my wife and future children.” Smart meters are not healthy for anyone, regardless of their medical conditions or health. Since I am not claiming health conditions from a smart meter, I do not have to supply any medical records. Furthermore, the apprehension of harm is sufficient to define assault, and that my perception that smart meters will cause harm is based on a plethora of studies which demonstrate this. Medical records, the present state of my health and my wife’s health, have NOTHING to do with the questions you are asking. I am happy to admit there are no relevant hospital records or medical conditions regarding my future medical conditions. If the Respondent is implying that I should provide medical records of others who have already been harmed, I cannot at this time under the HIPPA restrictions since I am not able to access the medical records of others who have already been harmed. However, since Respondent is trying to get me to provide medical records of others, they should do their due diligence that they rightfully should have been done by the PUC and the EDCs for them by providing medical records of others. I reserve the right to present any such medical records that turn up in the future.

I request of the PUC and of Duquesne Light any medical records they possess or have access to of any one who claims to have been harmed by EMR.

Duquesne Light to Complainant-

4. Produce all Documents, including but not limited to hospital and/or medical records and studies, that relate to Your answer to Discovery Request No. 3.

ANSWER:

See answer to number 2.

Duquesne Light to Complainant-

20. Identify all medical conditions that You contend make You vulnerable to, or that would be aggravated by, proximity to an Itron SK9AMI7 HW 3.1 OpenWay CENTRON Singlephase Smart Meter.

ANSWER:

See answer to number 2.

Duquesne Light to Complainant-

21. Produce all Documents, including but not limited to hospital and/or medical records and studies, demonstrating that You suffer from the medical condition(s) identified in Your response to Discovery Request No. 20.

ANSWER:

See answer to number 2 and number 20.

Duquesne Light to Complainant-

22. Produce all Documents, including but not limited to hospital and/or medical records and studies, demonstrating the relationship between the medical condition(s) identified in Your response to Discovery Request No. 20 and Your proximity to an Itron SK9AMI7 HW 3.1 OpenWay CENTRON Singlephase Smart Meter.

ANSWER:

See answer to number 2 and 20.

Duquesne Light to Complainant-

23. Identify all medical conditions that You contend make Your wife vulnerable to, or that would be aggravated by, proximity to an Itron SK9AMI7 HW 3.1 OpenWay CENTRON Singlephase Smart Meter.

ANSWER:

There are no records responsive to your request. I am not claiming my wife has any health conditions from the installation of a smart meter, nor has she visited a doctor due to adverse reactions from the installation of a smart meter since we do not have a smart meter. The Formal Complaint I sent in states "I am concerned it may cause an adverse effect on my health and my wife and future children." Smart meters are not healthy for anyone, regardless of their medical conditions or health. Since I am not claiming she has any health conditions from a smart meter, I do not have to supply her medical records.

Duquesne Light to Complainant-

24. Produce all Documents, including but not limited to hospital and/or medical records and studies, demonstrating that Your wife suffers from the medical condition(s) identified in Your response to Discovery Request No. 23.

ANSWER:

See answer to number 23.

Duquesne Light to Complainant-

25. Produce all Documents, including but not limited to hospital and/or medical records and studies, demonstrating the relationship between the medical condition(s) identified in Your response to Discovery Request No. 23 and Your wife's proximity to an Itron SK9AMI7 HW 3.1 OpenWay CENTRON Singlephase Smart Meter.

ANSWER:

See answer to number 23.

VERIFICATION

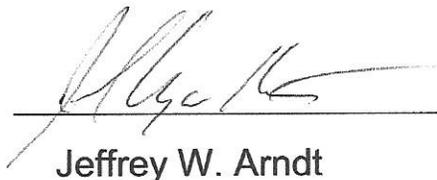
Supplemental Responses to Duquesne Light's First Set of Discovery Requests

Jeffrey W. Arndt v. Duquesne Light Company
Docket No. C-2018-3003482

I, Jeffrey W. Arndt, hereby state that the facts above set forth are true and correct (or are true and correct to the best of my knowledge, information and belief) and that I expect to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa. C.S. § 4904 (relating to unsworn falsification to authorities).

Date:

8/25/2019



Jeffrey W. Arndt