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Devin Ryan

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File #: 167945

August 30, 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 II 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 COMPLAINANT'S  
THIRD MOTION TO COMPEL DISCOVERY RESPONSES**

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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”) Third Motion to Compel Discovery Responses. As explained herein, the Complainant argues that PPL Electric has failed to provide timely answers to her second set of discovery requests. However, the Complainant erroneously claims that the second set of discovery requests were sent on August 5, 2019. In actuality, as evidenced by the envelope serving those discovery requests, the Complainant served them via first class mail on August 12, 2019. Therefore, the Complainant’s Third Motion to Compel was filed before the due dates for PPL Electric’s objections and answers to her second set of discovery requests. Moreover, on August 30, 2019, PPL Electric served its answers to the Complainant’s second set of discovery requests. Thus, the Company respectfully requests that Administrative Law Judge Elizabeth H. Barnes (the “ALJ”) deny the Motion to Compel because it was filed prematurely and is now moot.

In support of its Answer, PPL Electric states as follows:

## **I. INTRODUCTION**

1. On August 12, 2019, the Complainant served her “Objection” to the Company’s objections to her first set of discovery requests via first class mail only. Therein, on page 6 of the “Objection,” the Complainant propounded a second set of discovery requests on PPL Electric. (“Complainant to PPL Set II”) A true and correct copy of the Complainant to PPL Set II, including the envelope serving the “Objection,” is attached hereto as **Appendix A**.

2. Because the Complainant served Complainant to PPL Set II by first class mail only, three days were added to the deadlines for objections and answers to the discovery requests. *See* 52 Pa. Code § 1.56(b). Accordingly, PPL Electric’s objections were due by August 26, 2019, and its answers are due by September 4, 2019. *See id.* § 5.342(d)-(e) (stating that answers are due within 20 days of service of the interrogatories and that objections are due within 10 days of service of interrogatories).

3. On August 25, 2019, the Complainant filed a Motion to Compel responses to Complainant to PPL Set II and served it on PPL Electric via first class mail only.<sup>1</sup>

## **II. THE COMPLAINANT’S MOTION TO COMPEL SHOULD BE DENIED BECAUSE IT WAS FILED PREMATURELY AND IS NOW MOOT**

4. PPL Electric respectfully requests that the Complainant’s Motion to Compel be denied as premature and moot.

5. The Complainant erroneously contends that PPL Electric has failed to provide timely responses to her second set of discovery requests. (Motion, pp. 1-3.)

6. As explained previously, the Complainant filed her Motion to Compel before the deadlines for the Company’s objections and answers to her second set of discovery requests.

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<sup>1</sup> PPL Electric did not receive the Motion until August 28, 2019.

7. Specifically, the Complainant filed the Motion on August 25, 2019, without recognizing that PPL Electric's objections were due by August 26, 2019, and its answers are due by September 4, 2019.

8. The Complainant alleges, however, that she sent Complainant to PPL Set II on August 5, 2019. (Motion, p. 1.)

9. In actuality, the Complainant served Complainant to PPL Set II via first class mail on August 12, 2019, as evidenced by the envelope that contained the discovery. *See* Appendix A.

10. Until the September 4, 2019 deadline for the Company's answers passes, the Complainant cannot claim that the Company has failed to provide timely responses to her second set of discovery requests.

11. Furthermore, on August 30, 2019, PPL Electric served its answers to Complainant to PPL Set II.

12. Therefore, the Complainant's Motion to Compel is now moot.

13. Based on the foregoing, the Complainant's Third Motion to Compel was filed prematurely and is now moot and, therefore, should be denied.

### III. CONCLUSION

For the reasons set forth above, PPL Electric Utilities Corporation respectfully requests that Administrative Law Judge Elizabeth H. Barnes deny the Complainant's Motion to Compel because it was filed prematurely and is now moot.

Respectfully submitted,



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Date: August 30, 2019

Attorneys for PPL Electric Utilities Corporation

## **Appendix A**

**Objection by Dana Brennan to PPL Electric  
Utilities Corporation's Objections to the  
Interrogatories dated July 17, 2019, which  
includes Dana Brennan's Second Set of Discovery  
Requests**

Mrs. Dana Brennan  
16 Oslo Way  
Newfoundland, PA 18445

August 1, 2019

VIA Certified mail

PPL Electric Utilities Corporation C/O  
Attorney Devin Ryan  
17 North Second Street, 12<sup>th</sup> floor  
Harrisburg, PA 17101-1601

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

Dear Mr. Ryan,

Please find enclosed an Objection by Dana Brennan to PPL Electric Utilities Corporations Objections to the Interrogatories dated July 17, 2019. Also enclosed is a copy of Interrogatories for Production of Documents Propounded by Dana Brennan on PPL Electric Utilities Corporation for your convenience.

Sincerely,

  
Dana Brennan

Cc: Rosemary Chiavetta, Secretary  
Judge Elizabeth Barnes, Certified mail



Corporation and Attorney Ryan have been made aware of this fact and they received a number of certified mail pointing this out. To date I haven't received a reply from PP&L and Attorney Ryan pertaining to my Constitutional rights and their violations. However I will continue to voice my opinion under the Constitution first Amendment throughout this document or any other writing that I bring forth now or in the future.

1. I Dana Brennan, am entitled to and have a right to have all questions answered, to include questions in this paperwork as to legal grounds and court orders. It has been well established that the Smart Meter emits Electromagnetic frequency microwave radiation. It is documented that exposure to the Smart Meter will cause many health problems. I have asked PP&L Electric Utilities Corporation to supply material related to studies done that show the health effects of the Smart Meter radiation. PP&L Electric Utilities Corporation had no legal right to install the Smart Meter without first making me fully aware in detail of all the functions regarding taking my private information without consent and how PPL Electric Utilities Corporation had all intentions to use my home with the potential for them to make money from my private information. We have not received any information requested regarding this matter from either PPL Electric Utilities Corporation or Attorney Ryan. Why not?

2. PP&L Electric Utilities Corporation is trying to avoid answering any questions or provide requested information. None of the questions asked by Dana Brennan has a patent or copyright to be a real concern. PPL Electric Utilities Corporation did not provide all test studies, documentation and results for examination of microwave technologies with electromagnetic radiation.

When PPL Electric Utilities Corporation installed their Smart Meter on my property I had a right to know and ask questions. As a tax payer, property and home owner, I should have been told what the Smart Meter was going to do and if there were any health concerns whatsoever. PPL Electric Utilities Corporation never told me anything to clarify their full intentions. I was never given a warning of any danger related to the PPL Smart Meter or that my private information would be sold off to the highest bidder. I didn't have any say whatsoever about the installation of the Smart Meter. Can I walk into a PPL Electric Utilities office and take whatever I want?

### ILLEGAL SURVEILLANCE, WIRE TAPPING, SEARCH & SEIZURE

3. Definitions and answers provided by PPL Electric Utilities Corporation is the equivalent of taking the 5<sup>th</sup> Amendment refusing to answer questions or turning over test results pertaining to microwave technologies radiation and frequency amounts from the Smart Meter. How much radiation does the Smart Meter emit in a 24 hour time period? PPL Electric Utilities Corporation themselves are in unlawful denial of my Constitutional rights by attempting to collect information from within my home and property. PPL Electric Utilities Corporation MUST give a full report and explanation of results of what their

Smart Meter is capable of doing to our health and how they are collecting information by their Smart Meter SURVEILLANCE from within our home. How is PPL Electric Utilities Corporation planning to distribute my private information? I want to know how much money they will make on the sale? Who will receive my information with out my consent Will my information go over seas? Questions like this PPL Electric Utilities Corporation won't acknowledge or answer. Why not?

## NOTICE

MY PRIVATE INFORMATION IS NOT PP&L CORPORATION'S TO START WITH! THE INFORMATION IS THE SOLE PROPERTY AND OWNERSHIP OF THE HOME OWNER Dana Brennan AND MAINTAINS A COPY RIGHT AS A WORK IN PROGRESS. GATHERING ANY INFORMATION FROM MY HOME OR PROPERTY WITH ELECTRIC SURVEILLANCE OR BY ANY OTHER MEANS WILL BE CONSIDERED AN UNLAWFUL ACT OF THEFT AND TRESPASSING. THERE ARE OTHER LAWS THAT PROTECT MY FAMILY AND OUR PRIVACY.

1<sup>st</sup> Amendment invading home and property

3<sup>rd</sup> Amendment taking my possessions.

3a. PPL Electric Utilities Corporation collecting any information such as e-mail, instant message, vides, photos, stored data, voice chats, file or transfers, video, cell phones, computers, lap tops, conferences, log-in time, social network, profiled details, the use of drone, hacked, seizure, wire tapping, electronic surveillance or collecting anything else from my private property and home will be considered theft and a criminal offence. PPL Electric Utilities Corporation will be held liable and punishable by law.

3b. PPL Electric Utilities Corporation can not secure my private information to any degree to my satisfaction, nor do they have any authorization or been granted permission or consent to view, copy, or sell anything from within my home and property. This includes information regarding any electric equipment like TV's, toasters, washing machine, the makes or brands or what frequency they transmit on. PPL Electric Utilities Corporation, to my knowledge, has not been granted permission by the Courts or Federal Government to set up a spy ring to collect information from citizens without due process of the law.

Questions pertaining to this matter are included in this document to be answered by PPL Electric Utilities Corporation.

3c. PPL Electric Utilities Corporation and Attorney Ryan have been notified by certified mail of other corporation's loss in lawsuits pertaining to privacy rights as well as Supreme Court decisions. NO response.

4. PP&L Electric Utilities Corporation installed their Smart Meter onto my property without authorization or consent, has continually avoided actually answering any questions whatsoever and has continually applied rhetoric to avoid disclosure of the facts. The public is not the "Primary and Paramount" beneficiary of the Smart Meter, only PPL Electric Utilities Corporation will profit. The public was lied to of the Smart Meters safety and a full disclosure of collecting personal information was never given. Anyone can go on eBay, Amazon and else where to buy screen guards to cover the Smart Meter to avoid radiation exposure. The general public have been purchasing meters to read the level of Radiation that they are being exposed to. Some families are installing shields within their homes to block out the radiation, others are using metallic paint to block the radiation in their children's rooms as well as other methods being used in an attempt to block out the radiation being emitted by the Smart Meters. Telling the public that they are only exposed to small amounts of radiation no more then a cell phone, microwave or other devices is misleading and does not represent the fact that any of the other devices that can be conveniently turned off. The public themselves had made a decision on their own to purchase those other devices. The Smart Meters were forced on consumers. PPL Electric Utilities Corporation excludes the fact that the radiation their Smart Meter emits never turns off, but runs continually. Therefore, we are expose to the radiation continually 7 days a week 24 hours a day 365 days a year.

#### NO WARNING TO THE PUBLIC

4a. When anyone buys a cell phone, lap-top or other device they are warned to use the device with caution and what harm or risk that may be involved, and not to have to device in close proximity of your body due to the radiation. There have been many examples of people having cancer and other problems from having EMF equipment on or in their close proximity.

This is something that PPL Electric Utilities Corporation has intentionally disregarded and mislead the public about by saying that the public or consumer have nothing to worry about or fear. MILLIONS upon millions of people are worried about the Smart Meter danger and the cover up they have been given.

5. PPL Electric Utilities Corporation has refused to acknowledge my Constitutional rights such as the 4<sup>th</sup> Amendment, the 14<sup>th</sup> Amendment and other laws that protect me from invasion of my privacy. PPL Electric Utilities Corporation has unlawfully denied me my rights to privacy with the Smart Meter installation using my home to collect information by surveillance electronically. There should be no reason why PPL Electric Utilities Corporation and Attorney Ryan can't answer questions. Attorney Ryan has been sent numerous notifications by certified mail pointing out this issue of which I have never received an answer to?

6. PP&L Electric Utilities Corporation and Attorney Ryan received "Interrogatories and Requests for production of documents propounded by Dana

Brennan” dated July 17, 2019 by certified mail. The document was totally ignored by objecting to all of our concerns. PPL Electric Utilities Corporation did not provide any information and are hiding the crucial information requested. I am told by Attorney Ryan that he is protecting PPL Electric Utilities Corporation information. However, PPL Electric Utilities Corporation wants to take any information from my home as they please 24 hours a day 7 days a week 365 days a year. I should have a reasonable expectation of privacy in my home but do not due to the Smart Meter. This is totally unfair and bias.

( PRESIDENT TRUMP )

7. President Donald J. Trump stated on August 1, 2019, that we have a Constitutional right to privacy. Why is my right to privacy being ignored by PPL Electric Utilities Corporation?

UNITED STATES REPRESENTATIVE  
( Kevin McCarthy ) Congressman majority house leader

8. On 7/18/2019 Congressman Kevin McCarty said we are entitled to keep our information safe and maintain it ourselves. We are not the client, we are a product, when they take your private information and sell it

NO SECURITY FOR MY PRIVACY

8a. Capital One Bank Corporation just had a major breach that involved countless customers and their private information. Our Government, Military, Postal Service, Face-book, Equifax, and many others have all been breached over the years. China, other Countries, and hackers have breached data from the United States. However, PPL Electric Utilities Corporation has no intentions at all of trying to protect my private information but will be selling it. It is more than clear that my information is just a money maker for PPL Electric Utilities Corporation and no more. It is obvious that the Smart Meters are not secure and provides a great opportunity for homes to be hacked into to include opening doors, turning on and off lights, etc. I have a right to keep my information safe and private.

8b. The issue related to my privacy has been voiced on numerous occasions to which I have not received any reasonable answer. The action by PPL Electric Utilities Corporation is illegal. No one has the right to deprive me of my Constitutional rights and other laws pertaining to my privacy. Why am I getting a run around and no answers? Do I have a Constitutional right to privacy under the 4<sup>th</sup> and 14<sup>th</sup> Amendments?

WHAT'S YOUR'S? WHAT'S OURS? DIAGRAM

9. PPL Electric Utilities Corporation and Attorney Ryan have been provided with the diagram entitled “What’s yours? What’s ours? The diagram

illustrates what the homeowner is responsible for and what PPL Electric Utilities Corporation is responsible for, is clearly illustrated in the diagram. The diagram is a document that is produced and supplied by PPL Electric Utilities Corporation themselves and clearly shows that at no time did PP&L have any responsibility beyond the electric meter, not even the box or cover that the meter plugs into.

Therefore, it is clear that the use of my breaker box, house wiring, or any other material is owned by myself and not PPL Electric Utilities Corporation to do with as they wish. As the homeowner I prohibited PPL Electric Utilities Corporation from any use of my home. PPL Electric Utilities Corporation has no jurisdiction or right to the material that was supplied, installed, and maintained by the homeowner only. As the homeowner I have the right to reject the use of my home and material's including wiring, breaker box or anything else that's not on the diagram list showing PPL Electric Utilities Corporations responsibility. I am paying and will continue to pay PPL Electric Utilities Corporation for supplying clean electricity. PPL Electric Utilities Corporation clearly has no rights whatsoever to be in my home or to take anything at all. PPL Electric Utilities Corporation is clearly attempting to trespass and invade my privacy covered under my Constitutional rights.

PP&L Electric Utilities Corporation must answer questions below:

10. When did PP&L Electric Utilities Corporation obtain a court order allowing them to use a wire tap, electronic surveillance, search, spy, track, surveillance or use any technology to gather information or anything whatsoever from my home and property?

11. Can you please provide me with the date that the Court approval was granted and a copy of the warrant in the administration action for Justice?

12. Name of Court and location were the Court Order was obtained?

13. What was the duration or date the Court Order started and ended?

14. Provide the name of the Judge that granted the order?

15. Please provide a copy of the Court Order PPL Electric Utilities Corporation have in their possession pertaining to allowing wire tapping or any other electronic surveillance they have been using to accumulate my private information?

16. Did PPL Electric Utilities Corporation ever have any Court Authorization granted to search the residence, premises and property of Dana Brennan?

## WE THE VICTIM, NOT WE THE PEOPLE

16a. I am being victimized by PPL Electric Utilities Corporation with their hands in my pockets demanding to use my home and selling my information. PPL Electric Utilities Corporation threatened to cut off my electric service when I called to complain about the installation of the Smart Meter I had objected to. I had to call out of state to have an operator tell me that if I do not agree to keep the Smart Meter that they would cut off my electric service completely. I thought they called that extortion. PPL Electric Utilities Corporation only cares about their self interest and making money off of each consumer by not being paid once as it's been for countless generations in the past, but now PPL Electric Utilities Corporation is demanding to be paid twice in the form of collecting my private information and selling it for a profit. I believe PPL Electric Utilities Corporations action in this matter is nothing less then illegal and criminal with how they have been handing people after they make a complaint. Millions upon millions of people around the world believe that the Smart Meters are bad and cause health problems. I believe that PPL Electric Utilities Corporation have no regards for anyone rights to privacy or any law prohibiting illegal search and seizure. I believe that nothing out weighs the privacy of the citizen of this country and their rights under the Constitution from illegal search and seizures.

## OLD COMPLAINT

17. This was just brought to my attention by Attorney Ryan. It has to do with an old complaint of damage caused from PPL Electric Utilities Corporation workers that happened years ago which I never received any answer to that letter. After some time I sent PPL Electric Utilities Corporation another letter with the same complaint and again that letter was also ignored. However, I knew PPL Electric Utilities Corporation received both letters because I sent them by certified mail and I still have the receipts. PPL Electric Utilities Corporations total disregard both letter's is what we can expect from PPL Electric Utilities Corporation and their customer service.

## OBSERVATION

I was watching a video of a woman that lives in Lancaster, PA suffering in pain from the microwave frequencies and radiation technology transmitted from Smart Meters. The woman has health problem caused from Smart Meters. PPL Electric Utilities Corporation went right into action to help the poor women in distress from her physical pain by punishing her more, in a couple minutes' they cut off her electric service completely and left her and her family in the dark. Now the woman and her family have no way to keep food, cook, wash, launder

clothing, no heat, air condition, or water from a well. Punishment and more pain were added to the woman's life for not submitting to the demands of PPL Electric Utilities Corporation. What a disappointment to see an Electric company behave as if they were totally immoral and having no human emotion or sympathy for another human being. PPL Electric Utilities Corporation has shown that they are nothing more than an organization that is looking for personal gain using predatory tactics to plunder from others as myself. PPL Electric Utilities Corporation action in this matter only falls short of beating the woman with a club. However, the mental stress and damage will be ongoing. PPL Electric Utilities Corporation has absolutely no right to ever feel that they are above the law and can just take what they want or violate my Constitutional Rights.

#### FAMILY 41/2 YEAR OLD

Our 4 ½ year old nephew was very recently diagnosed with LEUKEMIA. He is now in treatment in Hackensack Hospital in New Jersey. PPL Electric Utilities Corporation and Attorney Ryan were sent information I have obtained with the name of Mr. Barrie Trower had worked in the Royal Navy as a microwave expert and lectured around the world of the dangers of microwave technology, 5G and Smart Meters and how they are harmful to humans. Mr. Trower said the frequencies are extremely dangerous to one's health and also said that in three generations only one in eight children will be healthy. PPL Electric Utilities Corporation is placing their Smart Meters, in many cases, on the outside of sleeping quarters exposing the occupants to radiation continuously. It has been brought to PPL Electric Utilities Corporation's attention in other writings of how many people are taking measures in an attempt to block the radiation microwave frequencies. However, PPL Electric Utilities Corporation insists that their Smart Meters have no concern of alarm.

There are millions and millions of people that weren't made aware of or given any notice whatsoever of concern of the Smart Meter danger. Therefore, they have not taken any course of action to protect themselves or family members. PPL Electric Utilities Corporation is grossly negligent by not informing the general public that there may be health concerns. PPL Electric Utilities Corporation and the Court should take into consideration the experience that our Country went through with the tobacco industry. When they had the so called professionals and doctors testifying that smoking tobacco was not harmful to one's health. Today the Cancer Institution would argue that point and admit we were lied to or certainly misinformed of the danger. Today every pack of cigarettes displays a warning. After we experienced loved ones, friends and family dying of cancer we should have learned a lesson and not take the existing microwave radiation frequency technology as if it has no risk. Like the tobacco industry I am sure that PPL Electric Utilities Corporation will hire

individuals to claim that the Smart Meter cause no threat and that they will be well paid for their testimony. Without a doubt the expertise of Mr. Trower of the Royal Navy, in microwave frequency technology saying how dangerous Smart Meters are will be disregarded completely because though he is telling the truth, it does not fit the narrative.

#### NOTICE TO RESOLVE COMPLAINT

From the beginning I have attempted to resolve this matter in a peaceful way which PPL Electric Utilities Corporation and Attorney Ryan have been well aware of this fact. We simply and respectfully requested that an Analog Meter be re-installed to resolve the issue and to honor our privacy, that's all.

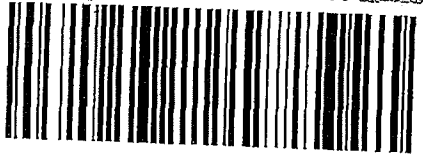
Please provide answers as originally requested and to new question provided on the Objections.  
Sorry for any inconvenience in delay, our child was in the hospital as well as my husband being ill.

Respectfully Submitted,

  
Dana Brennan

Cc: Judge Elizabeth Barnes  
Secretary Rosemary Chiavetta

**D** Dana Brennan  
16 Oslo Way  
Newfoundland, PA 18445



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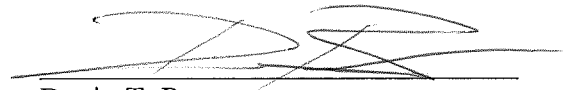
**CERTIFICATE OF SERVICE**

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 30, 2019



Devin T. Ryan