

**COMPLAINANTS' ANSWERS TO INTERROGATORIES AND REQUESTS FOR
PRODUCTION OF DOCUMENTS PROPOUNDED BY PPL ELECTRIC UTILITIES**

SET I

PPL to Complainant-I-1

Re: Formal Complaint.

- (a) Please explain in detail the reasons why you are challenging the Company's installation of the new smart meter.

Complainants' response:

Our reasons for challenging PPL's installation of a wireless smart meter on our homes are explained in sufficient detail in our Amended Formal Complaint. (See *Amended Complaint*.)

- (b) Please describe in detail all health concerns, if any, raised by the Company's new smart meter, state the bases for such claims, and provide all documents relied upon by you in your response.

Complainants' response:

Our health concerns are clearly indicated and described in detail in our Amended Formal Complaint; the bases are fully stated in, and all documents relied upon are provided with, that document. (See *Amended Complaint*.)

- (c) Please describe in detail all safety concerns, if any, raised by the Company's new smart meter, state the bases for such claims, and provide all documents relied upon by you in your response.

Complainants' response:

Our safety concerns are clearly indicated and described in detail in our Amended Formal Complaint; the bases are fully stated in, and all documents relied upon are provided with, that document. (See *Amended Complaint*.)

- (d) Please describe in detail all privacy concerns, if any, raised by the Company's new smart meter, state the bases for such claims, and provide all documents relied upon by you in your response.

Complainants' response:

Our privacy concerns are described in detail in our Amended Formal Complaint; the bases are fully stated in, and all documents relied upon are provided with, that document. (See Cause of Action IV and the *Summary and Conclusion* thereof in our *Amended Complaint*.)

- (e) Please describe in detail all reasons you believe the Company's new smart meter violates the law.

Complainants' response:

Our reasons for which we contend that PPL's actions pursuant to installation of wireless smart meter devices upon our homes deprive us of our rights and violate multiple state and federal statutes and laws are described in great detail in our Amended Formal Complaint. (See *Amended Complaint*.)

PPL to Complainant-I-2

Please identify all wireless phones, cellphones, microwaves, wireless routers, wifi networks, tablets, computers, Bluetooth speakers, wireless security systems, smart speakers (e.g., Amazon Echo), garage door openers, baby monitors, and walkie talkies that are contained in or used in the house.

Complainants' response:

We own a microwave oven and a hard-wired garage door opener for which the remote operation function is turned off most of the time and at night.

We also own an HP desktop computer in which wireless capability is disabled.

Our son owns an HP laptop computer and a MacIntosh laptop computer in which wireless functionality is disabled in both.

Our son also owns a cell phone. His usage of that device within our home is limited, and the device is not to be used in any part of the home in which other persons are present. When his cell phone is on and not in use, it is kept in 'airplane mode'. It is always turned off during sleeping hours.

PPL to Complainant-I-3

Please state whether you or any member of your household uses a cell phone. If so, please provide the make and model of each cell phone and, for each phone identified, provide 12 months of phone bills or other records of actual cell phone usage.

Complainants' response:

None of us, that is, none of the complainants in this case, owns a cell phone.

Our son's cell phone is an Apple iPhone. His phone billing records are private, and we do not have access to them.

PPL to Complainant-I-4

- (a) Please state every health condition you claim was caused by a smart meter or will be caused or worsened by the installation of PPL Electric's new smart meter.

Complainants' response:

We do not at present claim any existing health conditions.

The question is misleading.

It is not possible to predict "every health condition" that "will be caused or worsened by the installation of PPL Electric's new smart meter," and we therefore decline to state or make any such claim.

The risks of many biological and adverse health effects, which an abundance of peer-reviewed scientific evidence has strongly associated with the hazards of exposure to radiofrequency radiation and RF electromagnetic fields produced by wireless smart meter devices, are enumerated and elaborated upon at length in our Amended Formal Complaint. (See Cause of Action I and the *Summary and Conclusion* thereof in our *Amended Complaint*.)

Our action in this matter has been taken specifically to **prevent**, inasmuch as we are within our lawful rights, our being **forcibly** subjected to chronic, day-and-night, long-term, **involuntary** exposure to these additional hazards and risks to our health and safety by the installation of wireless smart meter devices on our homes.

- (b) Please provide the date that every health condition identified in subpart (a) began.
- (c) Please provide copies of all your medical records of every health condition identified in subpart (a).
- (d) For each alleged health condition that you do not have medical records for in response to subpart (c), please state whether such condition was diagnosed by a medical professional. If so, please provide the name, address, and telephone number of the medical professional and the date of the diagnosis.
- (e) For each of the alleged health conditions identified in subpart (a), please state whether you have been prescribed any therapy or treatment for the condition by a medical professional. If so, please identify the therapy or treatment, provide the name, address, and telephone number of the prescribing medical professional, and provide the date the therapy or treatment was prescribed.

PPL to Complainant-I-5

Please identify each person you plan to call as a fact witness in this proceeding. For each person, please:

- (a) Provide the person's name, home and business address, background, and 8g qualifications;
- (b) Explain in detail the subject matter(s) on which the witness is expected to testify; and

- (c) Provide the source(s) of information relied upon or referenced by the witness.

Complainants' response:

Up to the time of our filing our answers to this present set of interrogatories, we have not planned to call a fact witness to provide *oral, in-person* testimony in this proceeding.

PPL to Complainant-I-6

Please identify each person you plan to call as an expert witness in this proceeding. For each person, please:

- (a) Provide the person's name, home and business address, background, and qualifications;
- (b) Explain in detail the subject matter(s) on which the witness is expected to testify;
- (c) Provide the source(s) of information relied upon or referenced by the witness; and
- (d) Provide a copy of the expert witness's current curriculum vitae.

Complainants' response:

Up to the time of our filing our answers to this present set of interrogatories, we have not planned to call an expert witness to provide *oral, in-person* testimony in this proceeding.

PPL to Complainant-I-7

Please provide copies of all exhibits you intend to present or utilize at the evidentiary hearing in this proceeding. For each exhibit to be used as part of your direct case, please identify the witness who will be sponsoring the exhibit.

Complainants' response:

Copies of all exhibits which we intend to present or utilize at the evidentiary hearing in this proceeding are provided concomitantly with our Amended Formal Complaint. (See contents of flash drive accompanying *Amended Complaint*.)

CERTIFICATE OF SERVICE

We hereby certify that true and correct copies of *Complainants' Answers to PPL Interrogatories and Request for Production of Documents, Set I*, have 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):

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Date: September 13, 2019



John and Janet Holder