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**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

DORENE DOUGHERTY

Docket No. C-2018-3001474

vs.

**PENNSYLVANIA ELECTRIC
COMPANY**

**REPLY TO LETTER OF JULY 9, 2019 FROM TORI L. GEISLER TO PUC
SECRETARY CHIAVETTA**

Dorene Dougherty, complainant in the above case hereby replies to the letter of July 9, 2019 from Tori L. Geisler addressed to PUC Secretary Chiavetta.

After careful examination and review of the letter, complainant finds the letter to be improper, frivolous, abusive--containing false and misleading statements, a waste of the court's resources and may have been filed for illicit motives to prejudice this court against her.

Tori L Geisler states in ¶ 4: "*On June 19, 2019, ALJ Watson issued an Interim Order which, inter alia, held in abeyance the Company's Motion to Dismiss and ordered that Ms. Dougherty had until July 3, 2019 to provide full and complete responses to the Company's discovery. Ms. Dougherty has still not provided full and complete responses as directed.*"

This is completely and totally untrue. Complainant's full and complete answers to interrogatory questions 4(c),11, 13, 14, 15, 16, 17, 18, 19, and 20 were mailed on June 28, 2019 and received on July 1, 2019 and were verified by Dorene Dougherty. In addition, Complainant provided a full list of witnesses in the interrogatory answers as well as in the "Litigation Schedule" she filed on June 10, 2019.


Tori L Geisler further states on P2, ¶ 1,2: "*Ms. Dougherty has had ample time to submit her interrogatories to the Company, but she failed to do so until June 10, 2019, more than a year after she filed her Formal Complaint and significantly beyond the deadline established by ALJ Watson.*

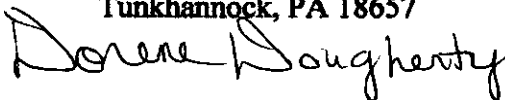
Ms. Dougherty avers that neither party would be prejudiced by permitting her to propound discovery this late in the complaint process. The Company disagrees as this would further delay the entire litigation schedule to which the Company has already expended a significant amount of time and resources adhering. Further, ALJ Watson has provided Ms. Dougherty with multiple extensions to respond to the Company's discovery requests and provide notification of witnesses which has already extended the litigation schedule."

Complainant has every right to propound interrogatories under the rules as does the respondent and since there has not been a full disclosure on the part of Pennsylvania Electric Company, complainant requires the information for her case.

For all of the above reasons Complainant, Dorene Dougherty, requests that the PUC disregard the letter from Tori L Geisler as improper and allow her case to proceed.

Date: July 24, 2019

By: 
Dorene Dougherty, All Rights Reserved
15 Margrow Road
Tunkhannock, PA 18657



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CERTIFICATION OF SERVICE

I hereby certify that I have served a true copy of the Reply To Letter Of July 9, 2019 From Tori L. Geisler To Puc Secretary Chiavetta via USPS to:

Rosemary Chiavetta, Secretary,
Pennsylvania Public Utility Commission
P.O. Box 3265
Harrisburg, PA 17105-3265

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Dorene Dougherty

Date: July 24, 2019

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