

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

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2019 SEP -9 AM 10: 00

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SECRETARY'S BUREAU

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


MOTION OF DANA BRENNAN TO OBJECT TO
PPL ELECTRIC UTILITES CORPORATION MOTION TO DISMISS
MY FORMAL COMPLAINT

TO THE HONORABLE ADMINISTRATIVE LAW JUDGE ELIZABETH H.
BARNES:

PPL Electric Utilities Corporations motion to dismiss my formal complaint is based on weak and unfounded grounds. PPL and Attorney Ryan have been much more delinquent in answering a great number of questions put forth to them over the months with no regard to answering them in a timely manner when first presented to them and in most cases not at all. Therefore, I respectfully request that the Hearing on September 10, 2019 at 9:00am go on as scheduled and PPL have all their witnesses in place for questioning.

On September 5, 2019 I received communication by electronic mail from Attorney Ryan's office with a whole list of unanswered questions. This has been a continuous repetition of non compliance by Attorney Ryan's office. On September 5, 2019 PPL sent their Answers to Interrogatories Set 1 & 111 asked by Complainant Dana Brennan in an untimely manner based on the questions having been asked of Attorney Ryan months ago only because the Honorable Judge Barnes had to step in and Order Attorney Ryan to comply. Mr. Durkin is named primarily as the author of the answers now being supplied which are still vague and incomplete. Furthermore, at no time was I informed by Attorney Ryan to direct my questions to Mr. Durkin for answers, Mr. Durkin in return states his answers are advised by counsel. I still have not received an answer from Attorney Ryan or Mr. Durkin as to how PPL Electric Utilities Corporation can use my electrical wiring for transmitting or receiving communication of their AMI Smart Meter.

Respectfully submitted,


Dana Brennan
September 5, 2019

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PENNSYLVANIA PUBLIC UTILITY COMMISSION

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

OBJECTION TO PPL ELECTRIC UTILITES CORPORATION
TESTIMONY RESPONSE OF KEVIN DURKIN 8/30/19

I received PPL responses to Interrogatories & requests for production of documents by Dana Brennan Set 11 Docket No. C-2019-3007121 from Attorney Ryan dated 8/30/19

I have a strong rejection to Attorney Ryan witness named Kevin Durkin for the following reasons.

1. Mr. Durkin, a paid witness for PPL, should make himself available during the hearing so he can be asked questions. If Mr. Durkin is not available all of his testimony and statements and testimony should be thrown out based on the following:

2. The writing received in PPL responses by Kevin Durkin consists of many named court cases which I would assume may or may not be related to my complaint. However, Mr. Durkin to my knowledge is now making a claim to be an expert or knowledgeable of other Court actions and procedures which he has not in any way claimed to be experienced in, other than being a paid witness that had testified for PPL on other occasions . I see no evidence in Mr. Durkin's testimony of having any expertise in this category and therefore, request that it be thrown out.

3. Mr. Durkin's signature is attached with an explanation saying that PPL will explain and prove the same. As the complainant I believe that Attorney Ryan wrote the entire paragraph as he wanted and simply asked Mr. Durkin to sign it as to create a witness. I believe this nothing more than a scam and dishonest. Therefore, Mr. Durkin's testimony should be struck from the record and disregarded completely.

Dana Brennan

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Cc Honorable Judge Barnes Via Email & First class mail

Rosemary Chiavetta first class mail

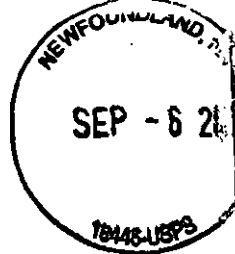
Attorney Ryan: I certify that I have served Attorney Ryan Via email & first class mail


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Dana Brennan
16 Oslo Way
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Secretary Rosemary Chiavetta,
PA Public Utility Commission
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P.O. Box 3265
Harrisburg, PA 17105-3265

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