

September 12, 2019

Linda Biconik
73 Cherry Lane
Homer City, PA 15748

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

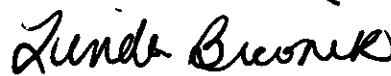
**Re: Linda Biconik v. Pennsylvania Electric Company
Docket No. C-2017-2632380**

Dear Secretary Chiavetta:

Attached, please find the Complainant's Response to Motion of Pennsylvania Electric Company to Compel Responses to Interrogatories and Document Requests in the above-referenced matter. This document has been served on the Respondent as shown in the attached Certificate of Service.

Please contact me if you have any questions or need anything further to process this filing.

Very truly yours,



Linda Biconik

Enclosures

Cc: As per certificate of service

PA P.U.C.
SECRETARY'S BUREAU

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Before the Pennsylvania Utility Commission

Linda Biconik,

Complainant.

Pennsylvania Electric Company,

Respondent.

Docket No. C-2017-262380

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Complainant's Response to Motion of Pennsylvania Electric Company to Compel Responses to Interrogatories and Document Requests

Complainant, Linda Biconik, *pro se*, files this Complainant's Response to Motion of Pennsylvania Electric Company to Compel Responses to Interrogatories and Document Requests, and in support thereof, avers as follows:

1. The averments paragraphs 1-13 of Motion of Pennsylvania Electric Company to Compel Responses to Interrogatories and Document Requests are admitted.
2. The averments in paragraphs 14-22 of Motion of Pennsylvania Electric Company to Compel Responses to Interrogatories and Document Requests are conclusions of law to which no response is required and are specifically denied.
3. The Stipulated Protective Agreement sent to Complainant on July 30, 2019, only agreed to protect information relating to Complainant Linda Biconik.
4. Upon receipt of the Stipulated Protective Agreement, via phone call, Complainant requested from Attorney Tori L. Geisler, counsel for Company, that the Company revise the Stipulated Protective Agreement to specifically also protect Michael Biconik's health information and send it again for execution.
5. Complainant has not yet received such a revised Stipulated Protective Agreement.
6. Complainant is compiling the necessary discovery responses and requests that a deadline of October 15, or 15 days after the receipt of a revised Stipulated Protective Agreement as set forth in Paragraph 3, above, by which the supplemental discovery responses are due.

7. Complainant is also anticipating reaching out to counsel for the Company to propose a settlement offer.

WHEREFORE, Complainant respectfully requests that the Commission deny Motion of Pennsylvania Electric Company to Compel Responses to Interrogatories and Document Requests and issue an Order providing that a revised Stipulated Protective Agreement be send to Complainant and that upon receipt, Complainant shall have 15 days to provide the supplemental discovery responses any other relief the Commission deems just and proper.

Respectfully submitted,



Linda Biconik
Complainant, *Pro se*
73 Cherry Lane
Homer City, PA 15748

Dated: 9/12/2019

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Certificate of Service

I hereby certify that this 12th day of September, 2019, I served a copy of Complainant's Response to Motion of Pennsylvania Electric Company to Compel Responses to Interrogatories and Document Requests upon the persons listed below via first class mail:

File with:

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

With a copy to:

Administrative Law Judge Jeffery A. Watson
Pennsylvania Public Utility Commission
Piatt Place, Suite 220
301 5th Avenue
Pittsburgh, PA 15222

Lauren M. Lepkoski
Tori L. Giesler
FirstEnergy Service Company
2800 Pottsville Pike
P.O. Box 16001
Reading, PA 19612-6001

Dated: September 12, 2019

Linda Biconik

Linda Biconik

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FOREVER / USA

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

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