

October 1, 2019

Via E-Mail

Honorable Elizabeth Barnes
Administrative Law Judge
PA Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor West
PO Box 3265
Harrisburg, PA 17105-3265

**Re: Kathleen R. Anthony v. PPL Electric Utilities Corporation
Docket No. C-2018-3000490**

Your Honor:

I am deeply grateful for the two previous extensions that you granted to me in recognition of the critical nature of the ongoing situation involving not only my family's future but that of many other people for whom we feel a personal responsibility. I filed Certificates of Service for Extension Motions, and I explained the situation in detail through confidential emails to both Your Honor and Mr. Devin Ryan, attorney for PPL.

The state of affairs in which my family and I find ourselves was not of our making. This current, ongoing, onerous matter has taken up a great deal of our time and a great deal of our resources. To this day, we are still scrambling and adjusting to an even more unlevel playing field than in the past. We have worked very hard and are currently sustaining that momentum in order to survive the situation. The lack of governmental regulatory oversight in this particular matter is now wreaking havoc on the entire system.

The Pre-Hearing Order of August 1, 2019, stated "*On or before August 30, 2018, Complainant is directed to serve copies of statements, reports, and any direct written testimony of any expert witnesses she intends to call at the hearing upon Respondent pursuant to 52 Pa, Code, § 5.412(a).*"

With limited time, scant resources, and as a pro se individual, I did my best to meet this particular due date. Throughout this entire period of time, my numerous inquiries finally resulted in two recommendations: I was able to find an expert witness, in the person of Tania M. Slawecki, as well as a physician, Dr. Kracht who understands the health implications of EMR.

As quickly as possible, I made the first appointment available with Dr. Kracht at the Woodlands Healing and Research Center in Quakertown, PA, which is scheduled for January 27, 2020.

People come from all over the world to see this doctor which is why I was not able to make an appointment any sooner.

If at all possible, I would like to have his testimony as to my existing health condition, the possible causative factors of my current health condition and, then, especially, the risks to my health and to my husband's current health condition along with the children still living at home should a wireless device (AMI, smart meter) be installed on our home. This doctor is by far more knowledgeable regarding the effects of EMR on human health and physical well-being.

My other witness works at Penn State as a Research Associate in the Microwave Processing and Engineering Center, Materials Research Institute and would provide excellent expert witness testimony to counter the testimony of PPL's experts. She is currently working on her testimony for another case and in consideration of her work schedule; her availability would likely be in early 2020. In attempting to meet the requirements of direct written testimony as set forth in the Pre-Hearing Order, I was able to obtain my expert's C.V. and a copy of a letter she wrote to the Legislators that is indicative of the content of her testimony in my case.

The attorney representing PPL, Mr. Devin Ryan, objected to my being able to present my witnesses at the time they would be available. He stated that I had plenty of time to prepare for this hearing including identifying any potential witnesses, even going so far as to count the number of days, as if I have just been frittering away the time. Mr. Ryan knows full well my reasons for the two previous extensions. His description of the third extension sounded to me as if he was blaming me for PPL's request for an extension. I had heard some very disturbing information about PPL's PLC system that could show possible causation related to me and my husband's health issues. I believed the information would be important to bring up for my case, and thus I amended my original complaint incorporating this new information. PPL believed an extension was necessary to address those issues.

Mr. Ryan also brought up the issue of "exigent" circumstances for any further time being allotted in my case. In looking up the definition of exigent, I found three words to describe a circumstance or situation as exigent - critical, urgent or special. I question whether or not Mr. Ryan's reason for requesting the third extension was any more exigent than mine are now - to be able to put on witnesses on my behalf as a pro se individual in this matter.

I am not the only pro se complainant that has had problems finding even one witness who is willing, available and affordable. Many are in other parts of the country or even overseas. I was very fortunate to finally find witnesses who reside in Pennsylvania.

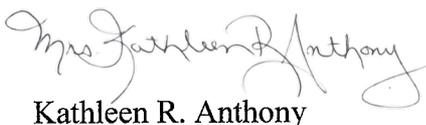
PPL has the resources to hire Mr. Devin Ryan from Post & Schell to handle the smart meter complaint cases. PPL also has the resources to hire additional assistance from a D.C. law firm, Watson and Renner and their experts, Dr. Davis and Dr. Israel.

When dealing with the current formal complaints in regard to the Smart Meters, I suspect that PPL uses the same expert witnesses over and over again. So, there was no burden in regard to PPL finding expert witnesses, nor was there any financial burden associated with their securing expert witnesses with corporate monies at their disposal. Meanwhile, I have done extensive research into the matter of securing an expert witness, with limited time, with scant procedural knowledge, in a critical financial moment for our family, who would be willing (minimal fee) to help me out in regard to my case.

As I initially stated, I am deeply grateful for the additional time Your Honor granted me previously at a very critical period of time for my family; however, taking into account all of the above considerations, I am humbling now requesting a short delay of a few months from the current date of my hearing. I do not believe a delay of an additional four months would be unreasonable.

The Commission has repeatedly striven to allow more leeway to pro se complainants who, under normal conditions, have neither the time, nor the resources, nor the legal knowledge as are at the disposal in regard to the utility companies. My circumstances have been far from normal. The outcome of this proceeding could certainly result in another exigent circumstance that my family and I would have to suffer. I believe it is only fair to allow me more time to call upon the witnesses whom I fortunately have been able to find and then to present my case to the best of my abilities.

Respectfully yours,

A handwritten signature in cursive script that reads "Mrs Kathleen R. Anthony". The signature is written in dark ink and is positioned above the printed name.

Kathleen R. Anthony

October 1, 2019

Via E-filing

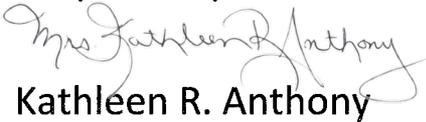
Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor North
P.O. Box 3265
Harrisburg, PA 17105-3265

Re: Kathleen Anthony v. PPL Electric Utilities Corporation
Docket No. C-2018-3000490

Dear Secretary Chiavetta:

Enclosed for filing is Complainant's Appeal to the September 11, 2019 Order disallowing a short continuance of her hearing date, scheduled for October 31, 2019. More time is needed for Complainant's witnesses to perform a medical evaluation and to prepare testimony ahead of the hearing.

Respectfully submitted,


Kathleen R. Anthony

Cc: Rosemary Chiavetta (Cover letter, Certificate of Service, Appeal)
Honorable Elizabeth Barnes (Via Email)
Devin T. Ryan, Esquire (Via Email)
Per Certificate of Service

PENNSYLVANIA PUBLIC UTILITY COMMISSION

Kathleen Anthony :
:
Complainant :
v. : **Docket No. C-2018-3000490**
:
PPL Electric Utilities Corporation :
:
Respondent :

CERTIFICATE OF SERVICE

I, Kathleen Anthony, hereby certify that I have sent this day my Appeal to the September 11, 2019 Order disallowing a short continuance of my hearing date, scheduled for October 31, 2019. More time is needed for Complainant’s witnesses to perform a medical evaluation and to prepare testimony ahead of the hearing in the above referenced proceeding.

Honorable Judge Elizabeth Barnes
EBARNES@pa.gov

Devin Ryan, Esquire, for PPL
DRyan@postschell.com

Date: October 1, 2019


Kathleen R. Anthony