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October 10, 2019

VIA ELECTRONIC 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: Linda E. Beck and Hubert P. Beck v. PPL Electric Utilities Corporation
Docket No. C-2018-3002924

Dear Secretary Chiavetta:

Enclosed for filing is the Motion of PPL Electric Utilities Corporation to Compel Responses to Discovery Propounded on Linda E. Beck and Hubert P. Beck – Set I in the above-referenced proceeding. Copies will be provided as indicated on the Certificate of Service.

Respectfully submitted,



Devin Ryan

DTR/dmc
Enclosure

cc: Honorable Elizabeth Barnes (*w/enclosure*)
Certificate of Service

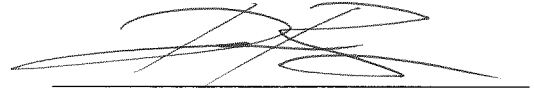
CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has 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).

VIA E-MAIL & FIRST CLASS MAIL

Linda E. Beck
Hubert P. Beck
933 Texter Mountain Road
Robesonia, PA 19551
E-mail: llawbeck@comcast.net

Date: October 10, 2019



Devin T. Ryan


**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

| | | |
|-------------------------------------|---|---------------------------|
| Linda E. and Hubert P. Beck, | : | |
| | : | |
| Complainants, | : | |
| | : | |
| v. | : | Docket No. C-2018-3002924 |
| | : | |
| PPL Electric Utilities Corporation, | : | |
| | : | |
| Respondent. | : | |

NOTICE TO PLEAD

YOU ARE HEREBY ADVISED THAT, PURSUANT TO 52 PA. CODE § 5.342(g)(1), YOU MAY FILE A REPLY TO THE ENCLOSED MOTION TO COMPEL WITHIN FIVE (5) DAYS AFTER THE DATE OF SERVICE. YOUR REPLY SHOULD BE FILED WITH THE SECRETARY OF THE PENNSYLVANIA PUBLIC UTILITY COMMISSION, P.O. BOX 3265, HARRISBURG, PA 17105-3265. A COPY OF YOUR REPLY SHOULD ALSO BE SERVED ON THE UNDERSIGNED COUNSEL.

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Date: October 10, 2019

Attorneys for PPL Electric Utilities Corporation

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

| | | |
|-------------------------------------|---|---------------------------|
| Linda E. and Hubert P. Beck, | : | |
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| Complainants, | : | |
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| v. | : | Docket No. C-2018-3002924 |
| | : | |
| PPL Electric Utilities Corporation, | : | |
| | : | |
| Respondent. | : | |

**MOTION OF PPL ELECTRIC UTILITIES CORPORATION TO
COMPEL RESPONSES TO
DISCOVERY PROPOUNDED ON LINDA E. AND HUBER P. BECK – SET I**

TO ADMINISTRATIVE LAW JUDGE ELIZABETH H. BARNES:

Pursuant to 52 Pa. Code §§ 5.342(g) and 5.349(d), PPL Electric Utilities Corporation (“PPL Electric” or the “Company”) hereby files this Motion to Compel Responses to Discovery Propounded on Linda E. and Hubert P. Beck (“Complainants”) – Set I. In support of its Motion, PPL Electric states as follows:

I. INTRODUCTION

1. On September 19, 2018, PPL Electric served Interrogatories and Requests for Production of Documents on the Complainants – Set I (“PPL to Complainants Set I”) via email and regular mail. A true and correct copy of PPL to Complainants Set I is attached hereto and marked as **Appendix A**.

2. Pursuant to the Commission’s regulations, objections to PPL to Complainants Set I were due on or before October 1, 2018, and responses were due on or before October 9, 2018.

3. The Complainants never served any objections or responses to PPL to Complainants Set I by those due dates.

4. On September 10, 2019, counsel for PPL Electric sent an email to the Complainants about, among other things, the status of the overdue discovery responses.

5. On September 16, 2019, the Company received the Complainants' answers to PPL to Complainants Set I. However, the response to Question 4 was incomplete. A true and correct copy of the Complainants' answers to PPL to Complainants Set I is attached as **Appendix B**.

6. Pursuant to the Fourth Prehearing Order dated August 7, 2019, the Complainants were required to serve any statements, reports, and direct testimony of any expert witness they intend to call on or before September 4, 2019.

7. The Complainants have not served any statements, reports, and direct testimony of any expert witness on PPL Electric to date.

8. The Company served its direct testimony and exhibits in this case on October 4, 2019, as required by the Fourth Prehearing Order.

9. To date, the Complainants have never sent a complete response to PPL to Complainants Set I, Question 4.

II. MOTION TO COMPEL

10. PPL Electric respectfully requests that the Administrative Law Judge Elizabeth H. Barnes (the "ALJ") compel responses to PPL to Complainants Set I, Question 4.

11. Under 52 Pa. Code § 5.321(c), a party is entitled to obtain discovery of any matter not privileged that is relevant to the pending proceeding, or any matter that is reasonably calculated to lead to the discovery of admissible evidence. Discovery is permitted regardless of

whether the information sought “relates to the claim or defense of the party seeking discovery or to the claim or defense of another party.” *Id.*

12. Objections to interrogatories and requests for production of documents must be served within 10 days of the date the discovery was served. 52 Pa. Code §§ 5.342(e), 5.349(d). Objecting parties remain under an obligation to provide timely answers to interrogatories or subparts of interrogatories to which they did not object. *Id.* § 5.342(f). Further, objections must be contained in a document separate from an answer. *Id.* §§ 5.342(c), 5.349(d).¹

13. Answers to written interrogatories must “[a]nswer each interrogatory fully and completely unless an objection is made.” *Id.* § 5.342(a)(4). Answers must be served within 20 days after service of the interrogatories. *Id.* § 5.342(d).

14. Similarly, a party shall serve a response to a request for documents within 20 days after the service of the request. *Id.* § 5.349(d). The requesting party may move to compel a response to a request for documents with respect to a failure to respond to the request. *See id.*

15. Here, the Complainants never objected to any of the questions in PPL to Complainants Set I.

16. Therefore, the Complainants have waived the right to object to all of these interrogatories and must provide answers to them. *See* 52 Pa. Code §§ 5.342(a)(4) (stating that a party must “[a]nswer each interrogatory fully and completely unless an objection is made”).

17. As explained herein, the Complainants have failed to comply with the Commission’s discovery rules by failing to provide a full and complete response to PPL to Complainants Set I, Question 4 and produce the documents sought by that discovery request.

¹ The Complainants did not serve objections to discovery. Therefore, Complainants’ failure to provide full and complete responses to discovery requests operate, in effect, as untimely objections.

18. For the reasons stated in more detail below, the ALJ should direct the Complainants to answer fully PPL to Complainants Set I, Question 4. Moreover, should the ALJ grant PPL Electric's Motion to Compel and the Complainants fail to timely provide full and complete responses to Complainants Set I, Question 4, PPL Electric intends to file a Motion for Sanctions pursuant to 52 Pa. Code §§ 5.371(a) and 5.372(a).

A. PPL TO COMPLAINANTS SET I, QUESTION 4

19. PPL to Complainants-I-4 requests the following:

- (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.
- (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.

20. The Complainants' response to PPL to Complainants-I-4 states:

- (a) Migraine headache, muscles pulsing in legs and chest, sleeplessness, indigestion, anxiety.
- (b) Nov. 31, 2017:migraine headaches. Dec. 20,2017: muscle pulsing. Sleeplessness Dec. 25,2017. Indigestion: Dec. 10,2017

- (c) N/A
- (d) N/A
- (e) N/A Drs I have talked to do not believe that electromagnetic radiation causes adverse effects. No Dr that I see will confirm that what I suffer from relates to the smart meter. They have not been educated with the truth about EMF safe standards. They have only been taught about thermal radiation that heats the body, and not non ionizing radiation which is what wireless radiation is.

21. As explained above, Section 5.342(a)(4) requires a party to fully and completely answer an interrogatory. 52 Pa. Code § 5.342(a)(4). In addition, a party has a duty to amend its prior responses to discovery requests when the information contained therein is incomplete. *Id.* § 5.332(2).

22. The Complainants' answer to Question 4 was non-responsive and incomplete.

23. The Complainants allege that the new automated metering infrastructure ("AMI") meter has caused, contributed to, or exacerbated adverse health effects and that it will cause, contribute to, or exacerbate adverse health effects. (*See* Amended Complaint ¶ 4.)

24. Therefore, the Complainants' medical records and conditions are highly relevant to this case.

25. In their answer to subpart (a), the Complainants identify several health conditions that they allege were caused by an AMI meter or will be caused or worsened by the AMI meter.

26. However, the Complainants provide absolutely no medical records about these alleged health conditions.

27. Unless the Company is provided with such records, PPL Electric's medical expert cannot review them and fully respond to the Complainants' allegations.

28. As a result, the Complainants should be compelled to provide a full and complete response to this interrogatory.

29. For these reasons, the ALJ should direct the Complainants to answer fully PPL to Complainants Set I, Question 4.

B. RESERVATION OF RIGHT TO SUPPLEMENT TESTIMONY AND EXHIBITS

30. The evidentiary hearing is currently scheduled for November 5, 2019, and all exhibits and testimony must be received by the ALJ no later than November 1, 2019.

31. Therefore, PPL Electric is filing this Motion to Compel to try to receive answers to the discovery in sufficient time before the evidentiary hearing.

32. In addition, on October 4, 2019, PPL Electric served the statements, reports, written testimony, and exhibits it intends to present at the hearing.

33. PPL Electric reserves the right to supplement or revise any of its exhibits, reports, and statements, to the extent that the Complainants serve a complete response to Question 4.

34. For these reasons, PPL Electric respectfully requests that the ALJ grant its Motion to Compel Responses to Discovery.

III. SANCTIONS

35. Upon the motion of a party, the presiding officer may make an appropriate order for sanctions if a party fails to answer or otherwise respond to a discovery request or refuses to obey an order of the presiding officer respecting discovery. *See* 52 Pa. Code § 5.371(a).

36. In ruling upon a motion for sanctions, the presiding officer may, among other things, issue: (1) “[a]n order that the matters regarding which the questions were asked, the character or description of the thing or land, the contents of the paper, or other designated fact shall be taken to be established for the purposes of the action in accordance with the claim of the party obtaining the order”; (2) [a]n order refusing to allow the disobedient party to support or

oppose designated claims or defenses, or prohibiting the party from introducing in evidence designated documents, things or testimony”; and (3) “[a]n order striking out pleadings or parts thereof, staying further proceedings until the order is obeyed, or entering a judgment against the disobedient party or individual advising the disobedience.” *Id.* § 5.372(a)(1)-(3).

37. If the Complainants fail to provide a full and complete response to PPL to Complainants Set I, Question 4 in sufficient time before the November 5, 2019 hearing, PPL Electric will be deprived of a reasonable opportunity to prepare for the hearing and respond to the Complainants’ health claims.

38. Accordingly, the Company respectfully requests that if the Complainants fail to produce the medical records to verify the existence of any claimed medical conditions or issues by October 22, 2019, then the Complainants should be precluded from litigating claims that the installation of PPL Electric’s AMI meter causes, contributes to, or exacerbates adverse health effects.

39. Finally, to the extent that this Motion is granted and the Complainants fail to answer fully PPL to Complainants Set I, or otherwise comply with the ALJ’s order, PPL Electric intends to file an appropriate motion pursuant to 52 Pa. Code §§ 5.371(a) and 5.372(a) to dismiss the Complaint with prejudice.

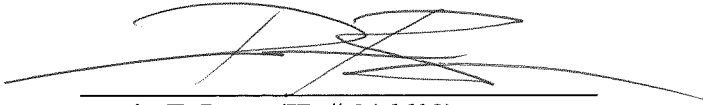
40. The Commission has regularly dismissed AMI meter complaints with prejudice due to the complainants’ failure to answer discovery in compliance with the presiding administrative law judge’s orders granting motions to compel. *See, e.g., Carol Sojda & Carol Lutzkanin v. Metropolitan Edison Co.*, Docket No. C-2017-2638350, pp. 7-8 (Jan. 9, 2019), *adopted*, Docket No. C-2017-2638350 (Order entered Mar. 28, 2019); *Kimberly Beckmann v. Metropolitan Edison Co.*, Docket No. C-2017-2613702, pp. 7-10 (Jan. 31, 2019), *adopted*,

Docket No. C-2017-2613702 (Order entered Apr. 11, 2019); *Darlene Stanton v. Pennsylvania Electric Co.*, Docket No. C-2018-3001144, pp. 6-11 (May 10, 2019), *adopted*, Docket No. C-2018-3001144 (Order entered July 11, 2019); *Diana Cook v. West Penn Power Co.*, Docket No. C-2018-3003051, pp. 6-10 (May 1, 2019), *adopted*, Docket No. C-2018-3003051 (Order entered July 11, 2019); *Kyle M. Denlinger v. PPL Electric Utilities Corp.*, Docket No. C-2018-3005721, pp. 4-11 (Aug. 16, 2019), *adopted*, Docket No. C-2018-3005721 (Order entered Sept. 26, 2019).

IV. CONCLUSION

For the reasons set forth above, PPL Electric Utilities Corporation respectfully requests that Administrative Law Judge Elizabeth H. Barnes grant this Motion to Compel Responses to Discovery and direct Linda E. and Hubert P. Beck to answer fully PPL to Complainants Set I, Question 4 as described above within three (3) days from the date of the order.

Respectfully submitted,



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Michael J. Shafer (ID # 205681)
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Fax: 610-774-4102
E-mail: kklock@pplweb.com
mjshafer@pplweb.com

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E-mail: crenner@w-r.com

Date: October 10, 2019

Attorneys for PPL Electric Utilities Corporation

APPENDIX A

Interrogatories and Requests for Production of Documents Propounded by PPL Electric Utilities Corporation on Linda E. and Hubert P. Beck – Set I



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717-612-6052 Direct
717-731-1981 Direct Fax
File #: 167945

September 19, 2018

VIA E-MAIL & REGULAR MAIL

Linda E. Beck
Hubert P. Beck
933 Texter Mountain Road
Robesonia, PA 19551

Re: Linda E. Beck and Hubert P. Beck v. PPL Electric Utilities Corporation
Docket No. C-2018-3002924

Mr. & Mrs. Beck:

Enclosed are the Interrogatories and Requests for Production of Documents Propounded by PPL Electric Utilities Corporation on Linda E. Beck and Hubert P. Beck – Set I in the above-referenced proceeding. Copies will be provided as indicated on the Certificate of Service.

Please provide answers to the enclosed discovery within twenty (20) days of the date of service, pursuant to 52 Pa. Code § 5.342.

Sincerely,

Devin Ryan

DTR/jl
Enclosures

cc: Rosemary Chiavetta, Secretary (*Letter & Certificate of Service Only*)
Certificate of Service

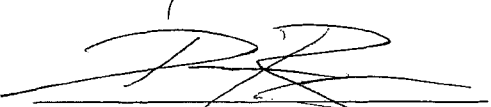
CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has 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).

VIA E-MAIL & FIRST CLASS MAIL

Linda E. Beck
Hubert P. Beck
933 Texter Mountain Road
Robesonia, PA 19551
E-mail: llawbeck@comcast.net

Date: September 19, 2018



Devin T. Ryan

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

| | | |
|-------------------------------------|---|---------------------------|
| Linda E. Beck and Hubert P. Beck, | : | |
| | : | |
| Complainants | : | |
| | : | |
| v. | : | Docket No. C-2018-3002924 |
| | : | |
| PPL Electric Utilities Corporation, | : | |
| | : | |
| Respondent | : | |

**INTERROGATORIES AND REQUESTS FOR
PRODUCTION OF DOCUMENTS PROPOUNDED BY
PPL ELECTRIC UTILITIES CORPORATION ON
LINDA E. BECK AND HUBERT P. BECK – SET I**

Pursuant to 66 Pa.C.S. § 333 and 52 Pa. Code §§ 5.341 *et seq.*, PPL Electric Utilities Corporation (“PPL Electric”) propounds the following Interrogatories and Requests for Production of Documents (hereinafter, “discovery requests”) on Linda E. Beck and Hubert P. Beck (“Complainants”) – Set I.

INSTRUCTIONS AND DEFINITIONS

1. The “Responding Party,” “you,” or “your” means the party to which these discovery requests are propounded and/or all attorneys, agents, affiliates, subsidiaries, employees, consultants, members, constituents, and representatives acting on behalf of the Responding Party.
2. “Commission” means the Pennsylvania Public Utility Commission.
3. To “identify” a natural person means to state that person’s full name, title or position, employer, last known address, and last known telephone number.

4. To "identify" a business entity means to state the full name of such business, the form of the business, and its location or address.

5. To "identify" a "document" means to provide all of the following information irrespective of whether the document is deemed privileged or subject to any claim of privilege:

- a. The title or other means of identification of each such document;
- b. The date of each such document;
- c. The author, preparer or signer of each such document; and
- d. A description of the subject matter of such document sufficient to permit an understanding of its contents and importance to the testimony or position being examined and the present or last known location of the document. The specific nature of the document should also be stated (*e.g.*, letter, business record, memorandum, computer print-out, etc.).

In lieu of "identifying" any document, it shall be deemed a sufficient compliance with these discovery requests to attach a copy of each such document to the answers hereto and reference said document in the particular interrogatory to which the document is responsive.

6. "Document" means the original and all drafts of all written and graphic matter, however produced or reproduced, of any kind or description, whether or not sent or received, and all copies thereof which are different in any way from the original (whether by interlineation, date-stamp, notarization, indication of copies sent or received, or otherwise), including without limitation, any paper, book, account, photograph, blueprint, drawing, sketch, schematic, agreement, contract, memorandum, press release, circular, advertising material, correspondence, letter, telegram, telex, object, report, opinion, investigation, record, transcript, hearing, meeting, study, notation, working paper, summary, intra-office communication, diary, chart, minutes, index sheet, computer software, computer-generated records or files, however stored, check, check stub, delivery ticket, bill of lading, invoice, record or recording or summary of any telephone or other conversation, or of any interview or of any conference, or

any other written, recorded, transcribed, punched, taped, filmed, or graphic matter of which the Responding Party has or has had possession, custody or control, or of which the Responding Party has knowledge.

7. "Communication" means any manner or form of information or message transmission, however produced or reproduced, whether as a document as herein defined, or orally or otherwise, which is made, distributed, or circulated between or among persons, or data storage or processing units.

8. "Date" means the exact day, month, and year, if ascertainable, or if not, the best approximation thereof.

9. Items referred to in the singular include those in the plural, and items referred to in the plural include those in the singular.

10. Items referred to in the masculine include those in the feminine, and items referred to in the feminine include those in the masculine.

11. The answers provided to these discovery requests should first restate the question asked and identify the person(s) supplying the information.

12. In answering these discovery requests, the Responding Party is requested to furnish all information that is available to the Responding Party, including information in the possession of the Responding Party's attorneys, agents, consultants, or investigators, and not merely such information of the Responding Party's own knowledge. If any of the discovery requests cannot be answered in full after exercising due diligence to secure the requested information, please so state and answer to the extent possible, specifying the Responding Party's inability to answer the remainder, and stating whatever information the Responding

Party has concerning the unanswered portions. If the Responding Party's answer is qualified in any particular, please set forth the details of such qualification.

13. If the Responding Party objects to providing any document requested on any ground, identify such document by describing it as set forth in Instruction 5 and state the basis of the objection.

14. If the Responding Party objects to part of a discovery request and refuses to answer that part, state the Responding Party's objection and answer the remaining portion of that discovery request. If the Responding Party objects to the scope or time period of a discovery request and refuses to answer for that scope or time period, state the Responding Party's objection and answer the discovery request for the scope or time period that the Responding Party believes is appropriate.

15. If, in connection with a discovery request, the Responding Party contends that any information, otherwise subject to discovery, is covered by either the attorney-client privilege, the so-called "attorneys' work product doctrine," or any other privilege or doctrine, then specify the general subject matter of the information and the basis to support each such objection.

16. If any information is withheld on grounds of privilege or other protection from disclosure, provide the following information: (a) every person to whom such information has been communicated and from whom such information was learned; (b) the nature and subject matter of the information; and (c) the basis on which the privilege or other protection from disclosure is claimed.

17. As set forth in 52 Pa. Code § 5.342(g), these discovery requests are continuing, and the Responding Party is obliged to change, supplement, and correct all answers given to conform to new or changing information.

18. "Formal Complaint" means the Formal Complaint filed by the Complainant at Docket No. C-2018-3002924.

**INTERROGATORIES AND REQUESTS FOR
PRODUCTION OF DOCUMENTS PROPOUNDED ON
LINDA E. BECK AND HUBERT P. BECK – 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.
- (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.
- (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.
- (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.
- (e) Please describe in detail all reasons you believe the Company's new smart meter violates the law.

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.

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.

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.
- (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 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.

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.

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.

APPENDIX B

**Linda E. and Hubert P. Beck's Responses to the
Interrogatories and Requests for Production of Documents
Propounded by PPL Electric Utilities Corporation on
Linda E. and Hubert P. Beck – Set I**

SEP 16 2019

Certificate of Service

We hereby certify that a true and correct copy of answers to interrogatories has been served upon Mr. Devin Ryan, Esquire, in accordance with the requirements of 52 Pa. Code § 1.54 - mailed Sept. 13, 2019

Via E-mail & First Class Mail

Linda E. Beck
Hubert P. Beck
933 Texter Mtn. Rd.
Rahersonia, Pa 19551
E-mail: llawbeck@comcast.net
hclbeck@comcast.net

Re: Linda E. Beck & Hubert P. Beck

v.

PPL Electric Utilities Corporation

Docket No. C-2018-3002924

DATE: SEPTEMBER 12, 2019

Hubert Peter Beck
Linda E. Beck

Interrogatories and Requests
for Production of Documents
Propounded on Linda E. Beck
and Herbert P. Beck - Set 1,

C. 2018-3002924

**INTERROGATORIES AND REQUESTS FOR
PRODUCTION OF DOCUMENTS PROPOUNDED ON
LINDA E. BECK AND HUBERT P. BECK – 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.
- (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.
- (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.
- (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.
- (e) Please describe in detail all reasons you believe the Company's new smart meter violates the law.

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.

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.

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.
- (b) Please provide the date that every health condition identified in subpart (a) began.

INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS PROPOUNDED ON LINDA E. BECK AND HUBERT P. BECK - SET I

PPL to Complamant-1-1
Re: Formal Complaint.

- (a) Please explain in detail the reasons why you are challenging the Company's installation of the new smart meter. We did not consent to the change from analog to smart meter and would never do so based upon my family and personal response to electromagnetic radiation as I experience in stores, while checking out with debit card, on wifi printers, wifi computers in libraries, cafe wifi, etc. Under the Bill of Rights, 5th Amendment: Protection of Rights to Life, Liberty and Property "no person shall be deprived of life, liberty or property: without due process of law; no private property shall be taken for public use without just compensation." I feel that am being deprived of my right and liberty to my private property. Against my consent PPUC has placed an electromagnetic radiation emitting device on my property that causes me great pain, anxiety, and chronic headaches when in the vicinity of our house. We did not consent to having this meter on our home where we live a lifestyle free of wifi and any and all wireless or microwave appliances and devices. We would like to continue our lives with our analog meter that was safe and emitted no electromagnetic radiation.

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. Migraine Headaches, sensations like worms are crawling from my ear to my eye brow, muscle sensations like jittery pulses in calves, and chest. Indigestion, Chronic anxiety from pulses disrupting my body.

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.

(b)

(c) the meter can not be turned off to reduce these sensations in my body; I must leave home and move to a location 100 or more ft from meter. This is not safe for me. The meter does not provide me with a safe environment to live in. We are not wealthy enough to afford relocating the meter. I need a home where I can sleep, eat and enjoy social life, but I can not tolerate the effects of the meter and this is very frustrating . I consider this neglect of my rights as a senior citizen whose home was a safe refuge for 29 years has now become contaminated with electromagnetic radiation.

- (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.

I do not have proof but I've heard that the meters will share my families usage with 3rd parties. If this is so I do not consent to this.

- (e) Please describe in detail all reasons you believe the Company's new smart meter violates the law. The meter violates my right to a clean atmosphere in my home free from electromagnetic radiation.

I believe in the rights of all mankind to live in a home as he chooses, to enjoy the peace and comforts of home there. I can not do that in my home with your smart meter pulsing out radiation into the rooms where I should be able to live.

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. Apple Lap Top Computer wired by ethernet cable turned off except for moments like this. Chromebook wired by ethernet cable turned off except for emergencies.

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. 2 Tracfones kept in car turned off. Only used for emergency. No contract, No record of phone bills or records of usage.

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. Migraine headache, muscles pulsing in legs and chest, sleeplessness, indigestion, anxiety.

- (b) Please provide the date that every health condition identified in subpart (a) began. Nov. 31, 2017: migraine headaches. Dec. 20, 2017: muscle pulsing. Sleeplessness Dec. 25, 2017. Indigestion: Dec. 10, 2017

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- (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 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.

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.

(c) Please provide copies of all your medical records of every health condition identified in subpart (a). N/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. N/A

- (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. N/A
 Drs I have talked to do not believe that electromagnetic radiation causes adverse effects. No Dr that I see will confirm that what I suffer from relates to the smart meter. They have not been educated with the truth about EMF safe standards. They have only been taught about thermal radiation that heats the body, and not non ionizing radiation which is what wireless radiation is.

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 qualifications; N/A

- (b) Explain in detail the subject matter(s) on which the witness is expected to testify; and N/A

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

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; N/A
- (b) Explain in detail the subject matter(s) on which the witness is expected to testify; N/A
- (c) Provide the source(s) of information relied upon or referenced by the witness; and N/A
- (d) Provide a copy of the expert witness's current curriculum vitae.

N/A

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7 N/A

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.