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Devin Ryan

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File #: 167945

October 16, 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: Kathleen R. Anthony v. PPL Electric Utilities Corporation**  
**Docket No. C-2018-3000490**

Dear Secretary Chiavetta:

Enclosed for filing is the Motion of PPL Electric Utilities Corporation to Compel Responses to Discovery Propounded on Kathleen Anthony – 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 EMAIL & FIRST CLASS MAIL**

Kathleen R. Anthony  
505 Norway Place  
Bethlehem, PA 18015-4435  
E-mail: [Kranthony7@gmail.com](mailto:Kranthony7@gmail.com)

Date: October 16, 2019



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Devin T. Ryan

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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

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**NOTICE TO PLEAD**

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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 16, 2019

Attorneys for PPL Electric Utilities Corporation

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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

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**MOTION OF PPL ELECTRIC UTILITIES CORPORATION TO  
COMPEL RESPONSES TO  
DISCOVERY PROPOUNDED ON KATHLEEN ANTHONY – SET I**

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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 Kathleen Anthony (“Complainant”) – Set I. In support of its Motion, PPL Electric states as follows:

**I. INTRODUCTION**

1. On June 6, 2018, PPL Electric served Interrogatories and Requests for Production of Documents on the Complainant – Set I (“PPL to Complainant Set I”) via email and regular mail. A true and correct copy of PPL to Complainant Set I is attached hereto and marked as **Appendix A**.

2. Pursuant to the Commission’s regulations, objections to PPL to Complainant Set I were due on or before June 18, 2018, and responses were due on or before June 26, 2018.

3. On June 14, 2018, the Complainant served objections to PPL Complainant Set I, Questions 2 and 3 via USPS mail.

4. Since that point, Complainant has filed several pleadings marked as “confidential”.

5. On June 22, 2018, the Complainant served her responses to Questions 1, 4, 5, 6, and 7. Therein, the Complainant declined to respond to PPL to Complainant Set I, Question 1(b) and Question 4 until a confidentiality agreement was signed by PPL Electric’s attorneys and witnesses.

6. On August 1, 2019, the Administrative Law Judge Elizabeth H. Barnes (the “ALJ”) entered a Protective Order governing the protection and treatment of confidential information and materials.

7. On August 15, 2019 and August 22, 2019, PPL Electric’s attorneys and witnesses provided signed non-disclosure certificates to Complainant pursuant to the Protective Order.

8. On October 9, 2019, counsel for PPL Electric sent an email to the Complainant about, among other things, the status of the overdue discovery responses to Questions 1(b) and 4.

9. On October 11, 2019, the Complainant sent correspondence to PPL Electric asking whether a doctor’s letter would be sufficient as a response to Questions 1(b) and 4.

10. On October 14, 2019, counsel for PPL Electric responded that the Company was requesting the actual medical records, not a doctor’s letter.

11. On October 15, 2019, the Complainant responded that she was in the process of trying to obtain her medical records.

12. The Complainant has not served any statements, reports, and direct testimony of any expert witness on PPL Electric to date.

13. The Company served its direct testimony and exhibits in this case on September 30, 2019, as required by the Fourth Prehearing Order.

14. To date, the Complainant has never sent complete responses to PPL to Complainant Set I, Questions 1(b) and 4.

## **II. MOTION TO COMPEL**

15. PPL Electric respectfully requests that the ALJ compel responses to PPL to Complainant Set I, Question 1(b) and Question 4.

16. 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.*

17. 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).<sup>1</sup>

18. 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).

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<sup>1</sup> The Complainant did not serve objections to the relevant discovery. Therefore, Complainant’s failure to provide full and complete responses to discovery requests operate, in effect, as untimely objections.

19. 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.*

19. Therefore, the Complainant has 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”).

20. As explained herein, the Complainant has failed to comply with the Commission’s discovery rules by failing to provide full and complete responses to PPL to Complainant Set I, Question 1(b) and Question 4 and produce the information and documents sought by those requests.

21. For the reasons stated in more detail below, the ALJ should direct the Complainant to answer fully PPL to Complainant Set I, Question 1(b) and Question 4. Moreover, should the ALJ grant PPL Electric’s Motion to Compel and the Complainant fails to timely provide full and complete responses to PPL to Complainant Set I, Question 1(b) and 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 COMPLAINANT SET I, QUESTION 1(b)**

22. PPL to Complainant-I-1(b) requests the following:

(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.

21. The Complainant’s response to Complaint-I-1(b) states:

(b) I will supply the names and addresses of all relative health care providers when all PPL personal have signed a confidentiality agreement that I will supply.

22. On August 1, 2019, the ALJ entered a Protective Order, which governs the protection and treatment of confidential information and materials in this proceeding.

23. On August 15, 2019 and August 22, 2019, the Company's witnesses and attorneys provided signed non-disclosure certificates to the Complainant.

24. Therefore, PPL Electric is entitled to receive the information requested in PPL to Complainant-I-1(b) pertaining to Complainant's health concerns regarding the Company's new automated metering infrastructure ("AMI") meter.

25. Question 1(b) simply asks the Complainant to detail the health concerns she has regarding the Company's new smart meter, and provide the bases and documents relied on for such claims.

26. This basic, foundational question is crucial to knowing what issues the Complainant will be raising at the evidentiary hearing. Without a complete answer, PPL Electric and its witnesses would not be fully prepared to respond to all of the Complainant's health-related allegations at the hearing.

27. Moreover, despite the Complainant's statement that she would provide this information once the appropriate confidentiality protections were in place, the Complainant still has not provided any formal or informal response to this interrogatory after the non-disclosure certificates were sent to her.

28. As such, the Complainant should be compelled to respond to PPL to Complainant Set I, Question 1(b).

**B. PPL TO COMPLAINANT SET I, QUESTION 4**

29. PPL to Complainant-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.

29. The Complainant's responses to PPL to Complainant-I-4(a)-(e) states:

(a)-(e) See Section I-1(b).

27. As explained above, the ALJ entered a Protective Order governing the protection and treatment of confidential information and materials, and the Company's witnesses and attorneys have provided signed non-disclosure certificates pursuant to that Protective Order.

28. Under Section 5.332 of the Commission's regulations, a party has a continuing duty to supplement discovery responses. 52 Pa. Code § 5.332. Now that confidentiality protections are in place, the Complainant must fully and completely answer this interrogatory.

23. Further, the Complainant alleges that the new AMI meter has caused, contributed to, or exacerbated adverse health effects and that it will cause, contribute to, or exacerbate adverse health effects.

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

25. However, the Complainant provides absolutely no medical records about these alleged health conditions.

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

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

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

**A. RESERVATION OF RIGHT TO SUPPLEMENT TESTIMONY AND EXHIBITS**

29. The evidentiary hearing is currently scheduled for October 31, 2019, and all exhibits and testimony must be received by the ALJ no later than October 25, 2019.

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

31. In addition, on September 30, 2019, PPL Electric served the statements, reports, written testimony, and exhibits it intends to present at the hearing.

32. PPL Electric reserves the right to supplement or revise any of its exhibits, reports, and statements, to the extent that the Complainant serves complete responses to PPL to Complainant Set I, Questions 1(b) and 4.

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

### III. SANCTIONS

34. 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).

35. 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).

36. If the Complainant fails to provide a full and complete response to PPL to Complainant Set I, Questions 1(b) and 4 in sufficient time before the October 31, 2019 hearing, PPL Electric will be deprived of a reasonable opportunity to prepare for the hearing and respond to the Complainant’s health claims.

37. Accordingly, the Company respectfully requests that if the Complainant fails to produce the medical records to verify the existence of any claimed medical conditions or issues by October 23, 2019, then the Complainant should be precluded from litigating claims that the installation of PPL Electric’s AMI meter causes, contributes to, or exacerbates adverse health effects.

38. Finally, to the extent that this Motion is granted and the Complainant fails to answer fully PPL to Complainant 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.

39. The Commission has regularly dismissed AMI meter complaints with prejudice due to the complainant's 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 Kathleen Anthony to answer fully PPL to Complainant Set I, Questions 1(b) and 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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Date: October 16, 2019

Attorneys for PPL Electric Utilities Corporation

# **APPENDIX A**

## **Interrogatories and Requests for Production of Documents Propounded by PPL Electric Utilities Corporation on Kathleen Anthony – Set I**



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File #: 167945

June 6, 2018

***VIA E-MAIL & REGULAR MAIL***

Kathleen R. Anthony  
505 Norway Place  
Bethlehem, PA 18015-4435

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

Dear Ms. Anthony:

Enclosed are the Interrogatories and Requests for Production of Documents Propounded by PPL Electric Utilities Corporation on Kathleen R. Anthony – 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

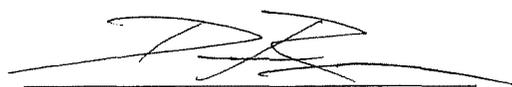
**CERTIFICATE OF SERVICE**

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 EMAIL & FIRST CLASS MAIL**

Kathleen R. Anthony  
505 Norway Place  
Bethlehem, PA 18015-4435  
[Kranthony7@gmail.com](mailto:Kranthony7@gmail.com)

Date: June 6, 2018



Devin T. Ryan

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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

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**INTERROGATORIES AND REQUESTS FOR  
PRODUCTION OF DOCUMENTS PROPOUNDED BY  
PPL ELECTRIC UTILITIES CORPORATION ON  
KATHLEEN R. ANTHONY – SET I**

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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 Kathleen R. Anthony (“Complainant”) – 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-2018-3000490.

**INTERROGATORIES AND REQUESTS FOR  
PRODUCTION OF DOCUMENTS PROPOUNDED ON  
KATHLEEN R. ANTHONY – 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**

## **Kathleen Anthony's Responses to the Interrogatories and Requests for Production of Documents Propounded by PPL Electric Utilities Corporation on Kathleen Anthony – Set I**

JUN 25 2018

June 22, 2018

Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone building  
400 North Street, 2<sup>nd</sup> Floor  
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 are my responses to the Interrogatories and Requests for Production of Documents, Set I, propounded upon me by PPL Electric Utilities Corporation, in the above referenced proceeding, sent within the 20 day allotted time period in regard to the set date of service, June 6.

Respectfully submitted,

  
Kathleen Anthony

Cc: Elizabeth Barnes, ALJ (w/out enclosure)  
Certificate of Service

JUN 25 2018

**PENNSYLVANIA PUBLIC UTILITY COMMISSION**

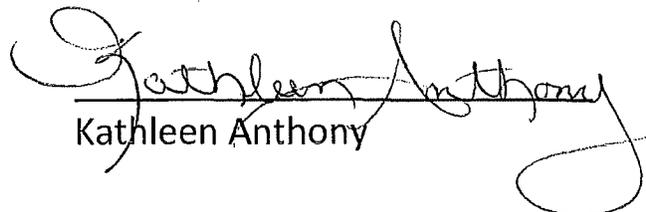
**Kathleen Anthony** :  
: **Complainant** :  
**v.** : **Docket No. C-2018-3000490**  
: **PPL Electric Utilities Corporation** :  
: **Respondent** :

**CERTIFICATE OF SERVICE**

I, Kathleen Anthony, hereby certify that I have this day sent via USPS Certified/Priority Mail my responses to the Interrogatories and Requests For Production of Documents propounded upon me by PPL Electric Utilities Corporation, Set I, within the set period of 20 days in regard to June 6<sup>th</sup> (date of service) to:

Devin Ryan, Esquire  
Post & Schell, P.C.  
17 North Second Street, 12<sup>th</sup> Floor  
Harrisburg, PA 17101

Date: June 22, 2018

  
Kathleen Anthony

JUN 25 2018

**PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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

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**Responses to PPL Interrogatories and Requests for Production of Documents, Set I**

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Kathleen R. Anthony to Respondent

Complainant to PPL -I-1

Re: Formal Complaint.

- (a) See letter of Formal Complaint.
- (b) I will supply the names and addresses of all relative health care providers when all PPL personal have signed a confidentiality agreement that I will supply.
- (c) See Formal Complaint. Further documents will be supplied at a later time.
- (d) See letter (c)

- (e) See 1501 and 1502 of the PUC Code. Also, see the American with Disabilities Act.

Complainant to PPL-I-2

My objections to this request were filed/sent via Certified Priority Mail on Thursday, June 14, within a 10 day period from the date of service, June 6.

Complainant to PPL -I-3

My objections to this request were filed/sent via Certified Priority Mail on Thursday, June 14, within a 10 day period from the date of service, June 6.

Complainant to PPL-I-4

- (a) See section I-1-(b)
- (b) See section I-1-(b)
- (c) See section I-1-(b)
- (d) See section I-1-(b)
- (e) See section I-1-(b)

Complainant to PPL-I-5

- (a) Not known at this time
- (b) Not known at this time
- (c) Not known at this time

Complainant to PPL-I-6

- (a) Not known at this time
- (b) Not known at this time
- (c) Not known at this time

(d) Not known at this time

Complainant to PPL-I-7

Not known at this time