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October 17, 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: Craig Bowes v. PPL Electric Utilities Corporation
Docket No. C-2018-3006101

Dear Secretary Chiavetta:

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

Respectfully submitted,

A handwritten signature in black ink, appearing to be 'DR', with a long horizontal line extending to the left and a shorter one to the right.

Devin Ryan

DTR/dmc
Enclosure

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

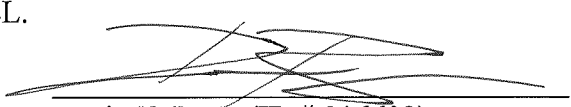
**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Craig Bowes,	:	
	:	
Complainant,	:	
	:	
v.	:	Docket No. C-2018-3006101
	:	
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 17, 2019

Attorneys for PPL Electric Utilities Corporation

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Craig Bowes,	:	
	:	
Complainant,	:	
	:	
v.	:	Docket No. C-2018-3006101
	:	
PPL Electric Utilities Corporation,	:	
	:	
Respondent.	:	

**MOTION OF PPL ELECTRIC UTILITIES CORPORATION TO
COMPEL RESPONSES TO
DISCOVERY PROPOUNDED ON CRAIG BOWES – 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 Craig Bowes (“Complainant”) – Set I. In support of its Motion, PPL Electric states as follows:

I. INTRODUCTION

1. On April 9, 2019, PPL Electric served Interrogatories and Requests for Production of Documents on the Complainant – Set I, Questions 1 through 7 (“PPL to Complainant Set I”) via certified 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 April 22, 2019, and responses were due on or before May 2, 2019.¹

3. The Complainant never served any objections to PPL to Complainant Set I by April 22, 2019.

4. On August 16, 2019, counsel for PPL Electric called the Complainant to discuss, among other things, the overdue discovery responses. During that conversation, the Complainant said that his wife had been sick, so he had not been able to focus on the discovery responses.

5. On August 22, 2019, the Complainant sent an email containing, among other things, some statements that were responsive to PPL to Complainant Set I, Questions 1 through 4, including a statement that the Complainants wife “has been disabled since 1990” and has “many chemical sensitivities” as well as information about the electrical equipment in his house, including his cellphones. However, the Complainant’s email did not provide all of the information and materials requested. Indeed, the Complainant did not provide any medical records or his hearing exhibits because the medical records allegedly would be approximately 1,800 pages long and his other “documents about RF, EMF, Pulsed EMF, etc [are] approaching 1600 pages.” A true and correct copy of the Complainant’s email is attached hereto and marked as **Appendix B**.

6. Pursuant to the Prehearing Order dated January 4, 2019, the Complainant was required to serve any statements, reports, and direct testimony of any expert witness he intends to call on or before April 30, 2019. That due date was later changed to October 1, 2019, pursuant to the Second Prehearing Order.

¹ Because the discovery requests were served by mail, three days were added to the prescribed due dates for answers and objections. *See* 52 Pa. Code § 1.56(b).

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

8. The Company originally served its direct testimony and exhibits in this case on May 31, 2019, which was the due date in the First Prehearing Order.

9. Pursuant to the Second Prehearing Order, PPL Electric will re-serve its direct testimony and exhibits in this case on November 1, 2019.

10. To date, no formal, complete responses to PPL to Complainant Set I have been received.

II. MOTION TO COMPEL

11. PPL Electric respectfully requests that the Administrative Law Judge Elizabeth H. Barnes (the “ALJ”) direct the Complainant to answer fully all of the interrogatories set forth in PPL to Complainant Set I.

12. 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.*

13. Answers to interrogatories are due within 20 days of the service date. 52 Pa. Code § 5.342(d).

14. Here, PPL Electric served its first set of interrogatories on April 9, 2019. Consequently, answers to PPL to Complainant Set I were due on or before May 2, 2019.

15. Now, over five months later, the Company still has not received formal and complete answers to PPL to Complainant Set I.

16. Indeed, the Complainant provided informal (but incomplete) responses to Questions 1 through 4 and absolutely no responses to Questions 5 through 7.

17. As it is now October 17, 2019, the responses are now well past due.

18. Further, the Complainant never objected to any of the questions in PPL to Complainant Set I.

19. Therefore, the Complainant has waived the right to object to 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. In addition, the interrogatories propounded by PPL Electric are highly relevant to the issues to be decided in this case, including the Complainant’s claim that the new automated meter infrastructure (“AMI”) meter will cause, contribute to, or exacerbate adverse health effects.

A. PPL TO COMPLAINANT-I-1

21. Question 1 simply asks the Complainant to detail the reasons why he is challenging the AMI meter’s installation and to identify, among other things, all health, safety, and privacy concerns he has with the new AMI meter. To the extent Complainant is making claims that installation of the AMI meter will cause or contribute to a medical condition, the medical records are important information for the Company’s medical expert witness to review.

22. These basic, foundational questions are critical to knowing what issues the Complainant will be raising at the evidentiary hearing. Without an answer, PPL Electric and its witnesses would not be fully prepared to respond to all of the Complainant’s issues at the hearing.

23. In his August 22, 2019 email, the Complainant generally states that his “wife has been disabled since 1990” and that “her illnesses . . . cause her many chemical sensitivities.” However, it is completely unclear what those alleged health conditions are. Appendix B.

24. Furthermore, nothing in the August 22, 2019 email responds to subsections (c), (d), and (e) of Question 1, which pertain to any safety, privacy, or legal claims that the Complainant will raise.

25. The Complainant has not provided a formal, complete response to this interrogatory and should be compelled to respond.

B. PPL TO COMPLAINANT-I-2

26. In Question 2, PPL Electric has asked that the Complainant 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 talks that are contained in or used in the house.

27. This inquiry is relevant to whether the Complainant exposes himself to technology that emits higher levels of radio frequency (“RF”) fields than the new AMI meter.

28. The Complainant has provided some information about the electrical equipment and cell phones used in his house, stating in his email that he “ha[s] a laptop,” uses a “dial-up modem,” has a “36” Vizio” TV, and “own[s] 2 Samsung emerge j3 cell phones.” Appendix B.

29. With the exception of the cell phones, the Complainant does not state with specificity as to the make and model of each of these devices.

30. PPL Electric is entitled to show how the RF exposures from the Complainant’s devices and appliances, compare to those from the AMI meter.

31. Therefore, the Complainant should be compelled to provide a formal, complete response that identifies all of these devices as requested.

C. PPL TO COMPLAINANT-I-3

32. In Question 3, the Company has requested information regarding the Complainant's cell phone usage and records of such usage.

33. Using this information, PPL Electric could calculate the amount of the Complainant's RF exposure from his cell phones and compare it to the lower amount of RF exposure from the new AMI meter. The level of RF exposure that Complainant already is getting from his cell phones can be calculated based on the minutes of Complainant's cell phone use, which typically are provided on each month's cell phone bill.

34. In fact, as the testimony of PPL Electric's expert witness on RF exposures – Dr. Christopher Davis – will demonstrate, the RF exposures received from use of a cell phone (or even standing within 30 feet of another person using a cell phone) and other devices are far higher than from an AMI meter.

35. The Complainant states in his informal response that he shreds the cell phone bills after paying them, so he would have to figure out a way to get copies of the bills. *See* Appendix B.

36. Without details on the number and length of the calls, PPL Electric's expert witness cannot calculate the precise amount of RF exposures from the cell phones.

37. PPL Electric is entitled to show how the RF exposures from the Complainant's devices and appliances, including any cell phones, compare to those from the AMI meter.

38. Thus, the Complainant should be compelled to provide the cell phone bills as requested.

D. PPL TO COMPLAINANT-I-4

39. In Question 4, PPL Electric has asked the Complainant to identify the health conditions he alleges will be caused or worsened by the installation of the AMI meter and to provide any medical records of those alleged conditions.

40. This is especially relevant because the Complainant has alleged that the AMI meter will cause, contribute to, or exacerbate adverse health effects. (*See* Complaint ¶ 4.)

41. In his August 22, 2019 email, the Complainant states that his “wife has been disabled since 1990” and that “her illnesses . . . cause her many chemical sensitivities.” However, it is completely unclear what those alleged health conditions are. Appendix B.

42. Further, the Complainant has provided absolutely no medical records about these alleged health conditions.

43. Indeed, the Complainant claims that the medical records would be “over 1800 pages” long. Appendix B.

44. Even assuming that is true, PPL Electric’s medical expert cannot review the medical records and fully respond to the Complainant’s allegations unless the Company is provided with such records.

45. Moreover, the Company is only requesting the medical records related to the health conditions the Complainant claims will be caused by, contributed to, or exacerbated by the new AMI meter.

46. Any other medical records that are not within the scope of that request can be omitted.

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

E. PPL TO COMPLAINANT-I-5 THROUGH 7

48. In Questions 5 through 7, PPL Electric has asked for basic information about the Complainant's case, including that he identify any lay witnesses and expert witnesses he plans to call to testify and that he provide copies of his proposed exhibits.

49. PPL Electric must know in advance of the hearing who will be testifying on behalf of the Complainant, if anyone, and the subject areas of their testimony.

50. Otherwise, PPL Electric would be denied due process. *See Schneider v. Pa. PUC*, 479 A.2d 10, 15 (Pa. Cmwlth. 1984) (citation omitted) (stating that due process is satisfied when a party is "afforded notice and the opportunity to appear and be heard"); 66 Pa. C.S. § 332(c) (providing that "[e]very party is entitled to present his case or defense by oral or documentary evidence, to submit rebuttal evidence and to conduct such cross-examination as may be required for a full and true disclosure of the facts").

51. Further, as mentioned previously, the Complainant's exhibits and expert testimony were due to be served on October 1, 2019, the Company's testimony and exhibits will be served on November 1, 2019, all exhibits and testimony must be received by the ALJ no later than December 2, 2019, and the evidentiary hearing is scheduled for December 5, 2019.

52. To date, the Complainant has not served any exhibits or expert testimony.

53. Therefore, with the hearing less than two months away, PPL Electric has severely limited information about the Complainant's issues, exhibits, and witnesses, if any, that he intends to present.

54. Moreover, even if the Complainants "documents about RF, EMF, Pulsed EMF, etc [are] approaching 1600 pages" as alleged in the Complainant's August 22, 2019 email, PPL Electric is entitled to discovery of those materials before the evidentiary hearing if the Complainant intends on presenting them as exhibits.

55. Thus, the Company is entitled to discovery of such basic and relevant information and documents, and the Complainant should be compelled to respond.

F. RESERVATION OF RIGHT TO SUPPLEMENT TESTIMONY AND EXHIBITS

56. The evidentiary hearing is currently scheduled for December 5, 2019, and all exhibits and testimony must be received by the ALJ no later than December 2, 2019.

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

58. In addition, on November 1 2019, PPL Electric will be serving the statements, reports, written testimony, and exhibits it intends to present at the hearing.

59. PPL Electric reserves the right to supplement or revise any of its exhibits, reports, and statements, to the extent that the Complainant serves any of these discovery responses.

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

III. SANCTIONS

61. 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).

62. 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).

63. If the Complainant fails to provide full and complete responses to PPL Electric’s discovery requests in sufficient time before the December 5, 2019 hearing, PPL Electric will be deprived of a reasonable opportunity to prepare for the hearing and respond to the Complainant’s claims.

64. Accordingly, the Company respectfully requests that if the Complainant fails to produce the information and documents related to any of his claims by November 14, 2019, then the Complainant should be barred from litigating the corresponding claim(s).

65. For example, if the Complainant fails to produce the medical records to verify the existence of any claimed medical conditions or issues, then the Complainant would be precluded from litigating claims that the installation of PPL Electric’s AMI meter would cause, contribute to, or exacerbate adverse health effects.

66. Similarly, if the Complainant fails to produce complete information about the current exposure to RF fields as requested in Questions 2 and 3, including but not limited to bills showing the extent of his cell phone use, then the Complainant would be precluded from litigating claims that PPL Electric’s AMI meter would expose him to unreasonable levels of RF fields.

67. 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.

68. 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 Craig Bowes to answer fully PPL to Complainant Set I, as described above within three (3) days from the date of the order.

Respectfully submitted,



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Date: October 17, 2019

Attorneys for PPL Electric Utilities Corporation

APPENDIX A

Interrogatories and Requests for Production of Documents Propounded by PPL Electric Utilities Corporation on Craig Bowes – Set I



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File #: 167945

April 9, 2019

VIA CERTIFIED MAIL (7017 1450 0002 3778 0833)

Craig Bowes
1531 N. 19th Street
Allentown, PA 18104

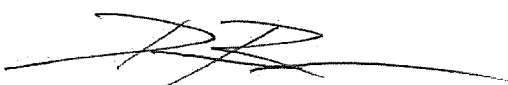
Re: Craig Bowes v. PPL Electric Utilities Corporation
Docket No. C-2018-3006101

Dear Mr. Bowes:

Enclosed are the Interrogatories and Requests for Production of Documents Propounded by PPL Electric Utilities Corporation on Craig Bowes – 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/jpf
Enclosures

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

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Craig Bowes,	:	
	:	
Complainant	:	
	:	
v.	:	Docket No. C-2018-3006101
	:	
PPL Electric Utilities Corporation,	:	
	:	
Respondent	:	

**INTERROGATORIES AND REQUESTS FOR
PRODUCTION OF DOCUMENTS PROPOUNDED BY
PPL ELECTRIC UTILITIES CORPORATION ON
CRAIG BOWES – 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 Craig Bowes (“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-2018-3006101.

**INTERROGATORIES AND REQUESTS FOR
PRODUCTION OF DOCUMENTS PROPOUNDED ON
CRAIG BOWES – 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.

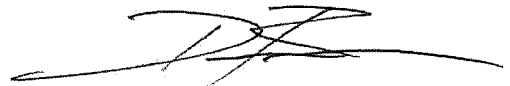
CERTIFICATE OF SERVICE

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 FIRST CLASS MAIL

Craig Bowes
1531 N. 19th Street
Allentown, PA 18104

Date: April 9, 2019



Devin T. Ryan

APPENDIX B

Craig Bowes's August 22, 2019 Email Informally Responding to Portions of PPL to Complainant Set I

Ryan, Devin

From: craigabowes@aol.com
Sent: Thursday, August 22, 2019 6:34 PM
To: Ryan, Devin
Subject: Intorogatories part 1

Follow Up Flag: Follow up
Flag Status: Flagged

Categories: PPL - Purple Category

Mr. Ryan,

I just wanted to get back to you about the information you requested.

After speaking with PPL and while my wife spoke with someone at the PUC explaining her illness and mentioning the she would be forced to leave our home if a smart meter was installed she was callously asked "how fast can you get out of your house lady?" we immediately started looking for a new place to live in a state that allowed an "opt-out" for people with medical issues. After many months of the difficult task of locating a home suitable to accomodate my wife's many sensitivities, we finally located a home in North Carolina which was scheduled to close on June 24th thus averting the necessity of following through with the complaint against PPL. I quickly packed all of our belongings in boxes in anticipation of the move and believing this would solve our meter issues in Allentown. The closing was then pushed to July 25th. We arrived in NC with all possessions in tow excited for a new beginning which included a new job offer for me. During our final walk through the day before the closing, my wife and I became seriously ill. We were to later find out that a well meaning A/C repairman had sprayed a powerful fungicide with cleaning agents in all of the the A/C ducts. Not knowing if the situation would have been able to be rectified, we were forced to cancel the contract, losing thousands of dollars in the process.

Broken hearted we returned to Allentown, unfortunately now being once again faced with our meter issues. My wife has been disabled since 1990. Because of her illnesses which cause her many chemical sensitivities, we live in a Lustron home which is constructed of porcelain on steel which includes the roof, exterior walls, interior walls, and the ceiling. The framing is also steel and the flooring is tile over a concrete slab. All of this works well to accommodate my wife's chemical and mold sensitivities.

When the smart meter rollout for water meters began we had to shield our windows with metal screening to provide protection from the signals they emit. When the PPL smart meter rollout stated we had to increase that shielding resulting in our windows now being covered with 8 layers of shielding. (I will be sending you photos) As you can imagine there is very little light penetration as well.

To answer some of your questions...

We do have a laptop, the battery was removed at the time of purchase as it's charging affects Liz adversely. We rarely connect to the internet, when we do we use a dial-up modem with AOL.

Our TV is a 36" Vizio that was purchased after using a pair of EMF meters to compare the output of every TV at Best Buy and Sam's club. No cable, no satellite, no roku, no hulu, no alexa, no wifi, no wireless alarm, no Bluetooth, no smart thermostat, no wireless or smart anything. Just a \$29 DVD player. We watch movies from Redbox and TV shows that we purchase the DVD's of.

I do own 2 Samsung emerge j3 cell phones. They are turned off before entering our home. When Liz drives alone, she take one with her for emergencies where it remains off unless she needs to contact me. I shred our bills after paying them so I'll have to figure a a way to get to copies if you insist.

As you can see we live a very different life than you and the other 99.99% of America.

I am having trouble putting together the information you requested for three reasons. #1 our possessions are still packed in boxes that are stacked everywhere with only the most basic necessities having been located. We did not keep the gathered information close at hand nor clearly marked as we were not anticipating having to follow through with this filing. #2 the sheer volume of information and the cost of reproduction of the materials is exorbitant #3 having to try to gather & reproduce the information if we cannot locate the original paperwork will take much more time than you have given us.

Just to give you an idea, the last time we copied my wife's medical records for an M.D. that insisted on seeing all of it, it weighed 27 pounds and was a little over 1800 pages and I believe I need to produce 5 copies in total...her medical timeline is over 25 pages alone.

Our documents about RF, EMF, Pulsed EMF, etc is approaching 1600 pages.

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 FIRST CLASS MAIL

Craig Bowes
1531 N. 19th Street
Allentown, PA 18104

Date: October 17, 2019



Devin T. Ryan