

Patricia Steely  
1116 Rainbow Avenue  
Reading, PA 19605

October 12, 2019

**Via First Class Mail**

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

**Re: Patricia Steely v. Metropolitan Edison Company  
Docket No. C-2018-3004770**

Dear Secretary Chiavetta,

Enclosed please find my Response to Metropolitan Edison Company's Motion to Dismiss per Judge Watson's Order to Hold in Abeyance the Motion to Dismiss pending my response.

Please contact me if you have any questions regarding this matter.

Very Truly Yours,



Patricia J. Steely

Enclosures

CC: ALJ Jeffery A. Watson  
As Per Certificate of Service

**RECEIVED**

OCT 12 2019

PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

<b>Patricia Steely</b>	:	
	:	
<b>v.</b>	:	<b>Docket No. C-2018-3004770</b>
	:	
<b>Metropolitan Edison Company</b>	:	
	:	

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**Response of Patricia Steely to Motion to Dismiss Per Order of ALJ  
Jeffery A. Watson dated September 30, 2019**

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Dear Judge Watson et al,

This is my timely filed Response to your Order to respond to MetEd's Motion to Dismiss. For the record, I would like to correct some inaccuracies and omissions in my case file. MetEd has written a Motion to Dismiss my case to which I responded on August 19, 2019. Your Honor put this Motion on hold to give me time to respond by October 15, 2019. MetEd's reasons for filing a Motion to Dismiss are flawed, and bordering on fraudulent. I will list the relevant events and filings that correct the record in my case to show what actually transpired. A review of the documents on file in my case will verify my response.

I am also providing Information regarding my chronic health conditions which limit my activities of daily living as defined by the ADA and the Rehab Act. I have been on Social Security Disability since 2010. I am functioning each day the best that I can under the circumstances. My health continues to fluctuate. I have several doctors who have, and are, treating me for these chronic and disabling conditions.

**History and relevant case filings:**

**Complaint filed in September 2018.**

**Preliminary Objections Denied on December 20, 2018 - MetEd.**

Your honor denied MetEd's Preliminary Objections at that point in the preceding because I was unrepresented and due to the Romeo Commonwealth Court decision. I did not understand the legal process and I did not realize what was required of me. Because of my chronic health conditions, I need more time to try to respond.

**Interim Order for Litigation Schedule on December 20, 2018.**

The first due date of February 14, 2019 called for Identifying expert and fact witnesses by February 14, 2019. (See below.)

**Interrogatories and Request for Production of Documents, Set I, on January 15, 2019 - MetEd**

**Request for extension of time to file Answers to Interrogatories, on January 31, 2019 - Steely**  
(PUC filed this as a Petition.)

I timely filed a response to the Interrogatories by asking for more time to provide my answers. I explained that my father had just passed away and my health was declining as a result. I asked for the due date to be changed to May 15, 2019.

My Request, by implication, would have included the due dates in the Litigation Schedule Order. I never received a response approving or denying my request for an Extension.

**Motion to Compel Answers to Interrogatories was filed on February 22, 2019 - MetEd.**

I have since discovered that because I did not know to copy MetEd on my Request for an Extension of time, MetEd subsequently filed this Motion to Compel.

**Answer to Motion to Compel (which included my Answers to Interrogatories), May 13, 2019 - Steely**

(The PUC labeled my response as an Answer to Motion.)

I sent partial answers to the Interrogatories two days before the extended date I had requested back on Jan. 31, 2019, and in accordance with MetEd's Instructions in section, A. As I previously stated, I had not received any response to my January 31st request for an extension of time to answer. I did respond to as many questions as I could. There were 38 questions, some having multiple questions within questions, for a total of 86 questions. Some of the questions were answered within other questions. My filed answers were hand-written on a copy of the actual questions sent by MetEd.

Also on this document, I asked a question of MetEd that has not been answered. See third page of the filing.

### **Order Granting Motion to Compel, May 13, 2019.**

This Order was filed the same day as I filed my partial answers to Interrogatories. (See above.) I had not received any response to my request for more time. However, on May 13, 2019, Your Honor also granted me an extension to file Answers by May 31, 2019.

### **Motion to Dismiss July 19, 2019 - MetEd**

Here MetEd incorrectly states that I did not answer any of their Interrogatories. Met Ed went so far as to submit a different set of questions, this time numbering 39. MetEd failed to send Your Honor a copy of my answers written on the 38-question document I that I filed on May 13, 2019.

### **Request for an Extension of Time, August 19, 2019 - Steely (PUC filed this as a Petition for Extension of Time to Comply.)**

I wrote this as an appeal asking that my complaint not be dismissed in response MetEd's Motion to Dismiss. I called the attorneys about this matter and they said I needed to ask for an extension to provide my answers to the interrogatories. MetEd had erroneously reported that I had not answered any of the Interrogatories and taking into consideration my health issues, this Motion to Dismiss my case is unjustified.

**Order Holding in Abeyance the Motion to Dismiss, September 30, 2019**

Your Honor kindly gave me until October 15, 2019 to respond to the Motion to Dismiss. This timely filed response serves to address the issues and correct the record.

I have repeatedly mentioned my health issues. I have been on Social Security Disability since February 2010. I had to leave my career as a nurse in 2008.

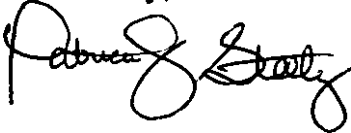
I lost my father early this year and on May 23, 2019, my car was rear-ended. Both of these situations exacerbated my chronic health conditions. The car accident also created additional health issues. The installation of a smart meter on my house would exacerbate my health conditions twenty-four hours a day, every day.

I have asked one of my doctors to write a letter outlining my several chronic health conditions and how they affect my ability to function in daily living. I have difficulty concentrating. I have been diagnosed with the following health conditions: Chronic Lyme, Fibromyalgia, Chronic Fatigue Syndrome, as well as Hypothyroidism, and Mitral Valve Prolapse.

I am disabled under the ADA and the Rehab Act. I am requesting that I be afforded the time I need to comply with the Interrogatory requests and any subsequent requests and due dates.

I am fortunate to have a friend who volunteered to help me with this response.

Sincerely,

A handwritten signature in black ink that reads "Patricia J. Steely". The signature is written in a cursive style with a large initial "P" and "S".

Patricia J. Steely

October 12, 2019

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**Patricia Steely** :  
 :  
 **v.** : **Docket No. C-2018-3004770**  
 :  
**Metropolitan Edison Company** :

**CERTIFICATE OF SERVICE**

I hereby certify that I have this day served a true copy of my response to Metropolitan Edison Company's Motion to Dismiss per Judge Watson's Order to Hold in Abeyance the Motion to Dismiss pending my response.

Service by First Class Mail to:

Lauren Lepkoski  
Tori Giesler  
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Administrative Law Judge Jeffrey A. Watson  
Pennsylvania Public Utility Commission  
Piatt Place, Suite 220  
301 5<sup>th</sup> Avenue  
Pittsburgh, PA 15222

Dated: October 12, 2019

Patricia J. Steely

Patti Stealy  
1116 Rainbow Ave.  
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