

917-787-0974

Cover Sheet

To: Rosemary Chiavetta, Secretary
Pa. Public Utility Commission

From: Norma Mosley
Docket # C-2018-3001526
Phone # 484-877-3750
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of Pages 14 + Cover Sheet

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Norma and Thomas Mosley
197 Forgehill Road
Hamburg PA 19526
484-877-3750

October 28, 2019

Rosemary Chiavetta, Secretary
PA Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd floor
Harrisburg, PA 17120

Re: Norma and Thomas Mosley v Met-Ed
Docket No. C-2018-3001526

EMERGENCY REQUEST FOR CLARIFICATION

Dear Secretary Rosemary Chiavetta :

On September 3, 2019 we received a Call-In Telephone Hearing Notice from the PUC Office of the Administrative Law Judge in Harrisburg, Pa. It is unsigned and unclear who ordered this notice for a hearing on November 6, 2019 at 10 a.m.

On October 1, 2019 we received an Interim Order Confirming Requirements for Evidentiary Hearing from Judge Watson. There were several mistakes that I noticed, the first mistake states the wrong Company (Pennsylvania Electric Company instead of Metropolitan Edison Company.)

I addressed this mistake in a letter I sent on October 7th and to this date I have not received a corrected interim order.

The second issue that needs clarification is that in the first paragraph of this same Interim order issued by Judge Watson on October 1, 2019, it states:

On September 3, 2019 a Hearing Notice was issued scheduling a telephonic evidentiary hearing in this proceeding for November 6, 2019 at 10:00 a.m. in Pittsburgh, Pennsylvania, The hearing will take place as scheduled on November 6, 2019 at 10:00 a.m.

What is confusing about this, is that it says this will be held in Pittsburgh? I don't understand since this was supposed to be held over the phone.

Norma Mosley
Oct. 31, 2019

After careful searching on the PUC site, I cannot find the file of this Interim Order posted on my case.

Another filing that needs clarification is the letter issued by Met-Ed on October 24th, 2019, where they state:

An in person hearing has been scheduled for November 6, 2019 at 10:00 a.m...

It is obvious the Company made a mistake by stating the hearing would be in person, when the notification on September 3, 2019 says it will be a telephonic hearing. This needs to be corrected and clarified as all of this is only creating more confusion.

After I received this letter from Met-Ed I called the office of Administrative Law Judge Jeffrey Watson seeking clarification and spoke to his assistant, and the information I was given created further confusion by telling me that I either needed to be there at the hearing in Pittsburgh or someone else needed to be there to represent my case.

Until these issues are clarified and corrected in writing I am unable to know what I'm supposed to expect or do as I am confused if this hearing is going to be held over the phone or in person and if it is in person, where? I am unable to travel to Pittsburgh and I don't have a representative because I am pro se. I am the one who will present the case on my own behalf.

A friend assisted in typing this emergency request for clarification in order to expedite this matter as time is of the essence.

I expect this to be clearly addressed in writing prior to the November 6th hearing date.

Norma Mosley

Copy to: Met-Ed ,fax: 877-289-3674, phone: 800-545-7741.
Administrative Judge Jeffery Watson, fax: 412-565-5692, phone:412-565-3550
Chief Administrative Law Judge Charles E. Rainey Jr., fax:717-787-0481, phone:
717-787-1191. *Sec. R. Chiavetta, fax 717-787-0974 Phone 717-712-7777*

Norma Mosley

10-31-19

To Be Read or written
Into the Records

Norma Mosley
10-31-19

To be read into the record, or written into the record at all smart meter harm to disabled PUC hearings!!!

1. My name is Norma Mosley. I am a complainant in the formal complaint against my assigned electric distribution company Met-Ed (name of company, such as Met-Ed, First Energy, Duquesne Light, etc).
2. I (plus family members if applicable) have a disability Spinal Osteoarthritis, Asthma, Open Head Injury (name of your disability, there may be many diagnoses, put them all down!!! do not limit to one disability), which interfere(s) with many of my activities of daily living.
Norma Mosley
3. I am under a physician's (or physicians') care for my disabilities. (if you have a doctor's letter or medical chart or notes, that is good, and mark them as "CONFIDENTIAL" and label them as "EXHIBIT A". I WILL DISCUSS HOW TO DEAL WITH EXHIBITS LATER IN THIS DOCUMENT) All Documents Already Sent
4. I have requested a reasonable accommodation from my assigned distribution utility for my disabilities, namely, an electromechanical analog meter ("analog meter") to measure my electrical usage, instead of a so-called "smart" meter, which emits wireless microwave signals.
5. This accommodation will not cause any undue burden on my assigned utility. In fact, this accommodation is offered to customers in over 30 other states of the US, and is far less expensive than deploying a smart meter on my property.

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Norma Mosley

Oct. 31, 2019

6. My assigned electric distribution utility has refused to accommodate my health needs, and threatens to terminate my electricity supply if I do not allow it to install a microwave emitting smart meter on my property.
7. The PA PUC has violated its mandate by misconstruing both the legislative intent of Section 2807 (f)(2) of PA Act 129 of 2008: 66 Pa. C.S.- Omnibus Amendments Act of Oct. 15, 2008, P.L. 1592, NO. 129, §2807 (F)(2) ("Act 129"), and the implementation of Section 2807 (f)(2) Act 129, as to smart meter deployment on my property.
8. My assigned electric distribution utility says it is required by the PUC and Act 129 to deploy a microwave emitting smart meter on my property and if I refuse, that it is within the law to terminate my electricity.
9. As a resident of the Commonwealth of Pennsylvania, I am entitled to receive electricity and other necessary utilities, if I pay for those utilities in accordance with my usage.
10. I require electricity to live. I pay all my utility bills on time.
11. By not providing me with my requested reasonable accommodation under threat of termination of my electricity supply, the PUC and my utility are violating many state and federal laws: (1) the federal Americans with Disabilities Act (as amended by the ADA Amendments Act), 42 U.S.C.A. §§ 12101 *et seq.*; (2) Section 504 of the federal Rehabilitation Act of 1973, 29 U.S.C.A. § 794(a); (3) the federal Fair Housing Act, 42 USC Section 3601 *et seq.*; (4) the Pennsylvania Constitution; (5) the United States Constitution; (6) the PA PUC Act, 66 PA Code, Sections 1501 and 1502.

12. I am submitting the following Exhibits to my testimony:

When your utility objects to the EXHIBITS as HERESAY, you tell them the exhibits are an exception to the hearsay rule. You are not an expert, so you are not submitting the exhibits for the truth of the matter asserted, but that you have read the Exhibits, you are in possession of the Exhibits, and you agree with the Exhibits and they support your assertions, so they should be admitted.

In the case several of the Exhibits, they are government advice, so not subject to cross examination or expert admissions.

Likewise, EXHIBIT D is a table of authorities, so it is not subject to any hearsay rules.

EXHIBIT A: My treating physician's note, which is marked **CONFIDENTIAL** and must be kept in a Confidential file in these proceedings. *already in my Case File*

EXHIBIT B: IEQ Indoor Environmental Quality Project Report, Access Board (2006) *https://www.access-board.gov/ieq/*

*NIBS IEQ Project
Final Report 07-05-06 97 pages*

EXHIBIT C: Department of Labor-Job Accommodation Network in its Accommodation and Compliance Series: Employees with Electrical Sensitivity

jam

ja@askjam.org

US DOL Job Accommodation and

*Nurma Mosley
10-31-19*

EXHIBIT D: United States 2018 State Smart Meter Opt-Out Survey with Authorities

EXHIBIT E: American Academy of Environmental Medicine, Recommendations regarding Electromagnetic and Radiofrequency Exposures (July 12, 2012)

www.aaeonline.org

EXHIBIT F: Davis, Devra: Environmental Health Trust Research Letter to Staff at Teton National Park Re: Telecommunications Infrastructure Plan EA (April 10, 2019).

www.ehtrust.org

EXHIBIT G: Priyanka Bandara, David O. Carpenter, "Planetary electromagnetic pollution: it is time to assess its impact", *The Lancet Planetary Health*, Volume 2, Issue 12, 2018, Pages e512-e514, ISSN 2542-5196, doi.org/10.1016/S2542-5196(18)30221-3

www.thelancet.com/planetary-health Vol 2 Dec 2018

EXHIBIT A Treating Physician notes

Already In My Case File
Letter from Heart Doctor full
disclosure of my (Norma Mosley) Tom Mosley's
Medical Records.

EXHIBIT B

IEQ Indoor Environmental Quality Project Report, Access Board (2006)



NBS IEQ Project
Final Report 07-05 at

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EXHIBIT C

Department of Labor-Job Accommodation Network in its Accommodation and Compliance Series: Employees with Electrical Sensitivity



US DOL Job
Accommodation_and

Norma Mosley
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EXHIBIT D

SMART METER OPT OUT SURVEY



United States 2018
State Smart Meter O

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10-31-19

EXHIBIT E

American Academy of Environmental Medicine, Recommendations regarding Electromagnetic and Radiofrequency Exposures (July 12, 2012)



AAEMEMFmedicalco
nditions.pdf

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10-31-19

EXHIBIT F

Davis, Devra: Environmental Health Trust Research Letter to Staff at Teton National Park Re: Telecommunications Infrastructure Plan EA (April 10, 2019).



**EHT Teton Cell
Tower Testimony 4-1**

Norma Mosley

EXHIBIT G

Priyanka Bandara, David O. Carpenter, "Planetary electromagnetic pollution: it is time to assess its impact", *The Lancet Planetary Health*, Volume 2, Issue 12, 2018, Pages e512-e514, ISSN 2542-5196, doi.org/10.1016/S2542-5196(18)30221-3



Bandara and
Carpenter 2018 Plan

Norma Mozley
10-31-19