

331 Shady Ridge Drive  
Monroeville, Pennsylvania

November 6, 2019

*Via Paper Filing*

Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
400 North Street  
Keystone Building, 2nd Floor  
Harrisburg, Pennsylvania 17120

RE: **Michele Hriadil and Francis Hriadil v. Duquesne Light Company**  
Docket No. C-2016-2571726

Dear Secretary Chiavetta:

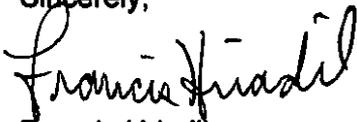
Enclosed please find a copy of Complainants'

Answer to Motion in Limine  
to Bar Complainants from Introducing or Relying Upon Inadmissible Evidence.

A copy of this document has been served upon ALJ Jeffrey Watson, Presiding PA PUC Pittsburgh Administrative Law Judge, and the Respondent's Counsel, Jeremy V Farrell, Esquire, in accordance with Commission regulations.

Please feel free to contact me if you have any questions.

Sincerely,



Francis Hriadil  
Complainant  
(412) 779-3314  
hriadil@attglobal.net

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PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

Enclosure

Cc: Judge Jeffrey Watson, Presiding PA PUC Pittsburgh Administrative Law Judge

Cc: Jeremy V Farrell, Esquire, Counsel for Duquesne Light Company

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Michele Hriadil and  
Francis Hriadil,

Complainant,

vs.

DUQUESNE LIGHT COMPANY,

Respondent.

No: C-2016-2571726

**ANSWER TO  
RESPONDENT'S  
MOTION IN LIMINE TO BAR  
COMPLAINANTS FROM  
INTRODUCING OR RELYING UPON  
INADMISSIBLE EVIDENCE**

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PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

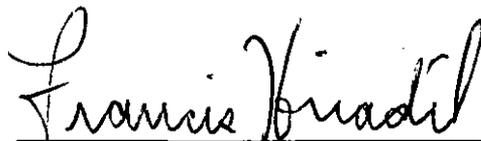
Filed by Michele and Francis Hriadil

hriadil@attglobal.net  
(412) 779-3314  
331 Shady Ridge Drive  
Monroeville, Pennsylvania

**ANSWER TO RESPONDENT'S  
MOTION IN LIMINE TO BAR COMPLAINANTS  
FROM INTRODUCING OR RELYING UPON INADMISSIBLE EVIDENCE**

TO: THE HONORABLE ALJ JEFFREY A. WATSON

ENCLOSED IS COMPLAINANTS' ANSWER TO RESPONDENT'S MOTION IN  
LIMINE TO BAR COMPLAINANTS FROM INTRODUCING OR RELYING UPON  
INADMISSIBLE EVIDENCE, WHICH THE COMPLAINANTS RECEIVED LATE ON  
OCTOBER 30, 2019.



Francis Hriadil  
November 6, 2019



pertinent and relevant evidence by the Complainants in support of our complaint, the issues we have raised and are raising, and our request for relief. It amounts to nothing but legal gamesmanship on the part of the Respondent, whose purpose is to impair the integrity of this Hearing process, impede the legitimate efforts of the Complainants to present the full scope and material, foundational facts of the matter, our complaint, and our request for relief.

Briefly, the record shows:

- On June 4, 2018, the Respondent filed its Motion for Summary Judgment, wherein it made its arguments purporting the irrelevance and inadmissibility of the Complainants' evidentiary documentation provided in Discovery, and verified per 52 Pa. Code § 1.36. The Complainants responded to this in our July 6, 2019 Response to Motion for Summary Judgment. Though not listed in the title of its motion, in addition to requesting a summary judgment in its favor, the Respondent extensively argued and specifically requested to disregard / discard / narrow the Complainants' Formal Complaint, New Matters (1, 2, 3, 4), and evidentiary documentation provided in Discovery, and verified per 52 Pa. Code § 1.36.

The motion that was made in the substance of Respondent's motion was more than just a request for summary judgment. The substance of this motion was two-fold: to either dismiss or narrow the Complainants' Formal Complaint and our evidentiary documentation. Both requests were denied, as the Respondent's motion was denied *in toto*.

- On February 1, 2019, the Respondent filed its Motion in Limine to Bar Complainants From Introducing or Relying Upon Inadmissible Evidence. The Complainants responded to this in our February 21, 2019 Response to Respondent's Motion in Limine to Bar Complainants From Introducing or Relying Upon Inadmissible Evidence refuting the Respondent's arguments. Here, the Respondent simply and essentially made and restated the arguments it presented in its Motion for Summary Judgment.

On March 4, 2019, the Respondent filed a Reply... to Complainants' Response... And, on March 16, 2019, the Complainants' filed our Answer... to the Respondent's Reply... Here, the Respondent offered no new or compelling argument in support of its February 1, 2019 Motion in Limine... The Complainants argued that this Motion in Limine... nothing other than a second attempt to narrow the Complainants' Formal Complaint and evidentiary documentation, making the exact same arguments again about irrelevancy, inadmissibility, and hearsay that were made in the Respondent's Motion for Summary Judgment. Complainants averred, and still aver, that the Respondent's arguments had already been made and denied, and to allow the Respondent to revisit these arguments through a second "Same Motion Intent by Another Name" was unfair and prejudicial against the Complainants.

The Respondent's motion was denied.

- On April 25, 2019, after our April 24 Prehearing Conference Call, the Respondent refiled its February 1, 2019 Motion in Limine to Bar Complainants From Introducing or Relying Upon Inadmissible Evidence. No ruling was made granting the Respondent's refiled motion.
- Now, on October 28, 2019, six (6) months later and a mere few weeks before our scheduled Hearing, the Respondent, again, files a Motion for Limine to Bar Complainants From Introducing or Relying Upon Inadmissible Evidence.

This is the record of the repeated effort by the Respondent to stifle relevant, pertinent, and admissible evidence. The Complainants' prior Responses... and Answers..., along with their supporting documents and exhibits, are still valid, and are incorporated here-in by reference as if fully restated.

4. In addition to this fourth (4th) attempt at suppressing the Complainants significant and substantial relevant and admissible evidence, the Respondent also filed a Motion in Limine to Preclude Complainants' Purported Expert Testimony, dated October 30, 2019 and received by the Complainants at the end of the day on November 1, 2019. This is forcing the Complainants to devote critical time away from our Hearing preparations to address these multiple nuisance filings. Again, we are two (2) elderly people representing ourselves, who are simply trying to safeguard our health and well-being, and preserve our rights. We have nothing close to the staff and resources of the Respondent. Michele Hriadil, who I, Francis Hriadil, now live with because of my clinical conditions, has full time work commitments and responsibilities, so the burden of preparing all responses, answers, filings, and paperwork falls predominantly on me. This filing of multiple Motions shortly before our Hearing is intentionally designed to overwhelm the Complainants at a critical time in our preparations. It is an ongoing nuisance tactic that has been employed by the Respondent throughout this proceeding, which continues to impose an unfair and undue burden on the Complainants.

5. In its argument, the Respondent “purports” that the substantial evidentiary documentation that the Complainants intend to introduce is

“irrelevant, confusing and cumulative, hearsay, improperly seek to advance legal arguments, or otherwise violate the Pennsylvania Public Utility Code or the Pennsylvania Rules.”

and that

“This action is not a collateral attack on Duquesne Light’s smart meter implementation plan, ... nor is it a challenge to the scientific merit of Act 129’s mandatory universal deployment of smart meters, which is settled law and binding precedent.”

This is absolute nonsense and is a completely disingenuous characterization of the Complainants’ evidence, our complaint, the issues we have raised and are raising, and our request for relief.

6. First, the material truth of the matter is that the scientific merit of smart meters and the PA PUC’s initial Implementation Order concerning the mandatory universal deployment of smart meters are not settled issues or settled law, especially not in the manner that the Respondent purports.

- It is material fact that there is now overwhelming scientific evidence concerning the harm of continuous, long term exposure to pulsed radiofrequency (RF) transmitting SMPS (Switch Mode Power Supply) devices such as Smart Meters in their Smart Meshes. And, that there are classes of people who are especially susceptible to harm from these devices, such as children, the elderly (which both Complainants, Michele Hriadil and Francis Hriadil, are), pregnant women, and the chronically ill (which Complainant Francis Hriadil is). Consumers, government officials, industry experts, scientists, doctors, engineers, scientific institutions, etc, have raised alarms about the health, safety, privacy, security, and legal issues associated with this program and these devices. The PA PUC has received expert testimony to these facts by such recognized experts as Dr Andrew Marino Phd JD (C-2015-2475726), Dr Martin Pall Phd (C-2015-2475726), and Dr David Carpenter MD (C-2017-2620710), to name but a few. The Complainants evidentiary documentation, supported by our expert witnesses, including Dr David Carpenter MD and Dr Andrew Michrowski PhD, will attest to this.
- It is a material fact that there are numerous ongoing Formal Complaints with the PA PUC against forced Smart Meter deployment, including the Complainants, concerning violation of Pennsylvania law and PA Codes, including but not limited to 66 Pa.C.S. § 701; 66 Pa.C.S. § 1501; 52 Pa. Code § 57.194.

- It is a material fact that the PA PUC has now officially ruled that Smart Meters can cause, and have caused, HARM.

In a recent complaint before the Commission, Maria Povacz, (ref. Maria Povacz v. PECO Energy Company, Docket No. C-2015-2475023), refused the installation of a smart meter on her residence because of health and safety concerns.

On January 26, 2018, PA PUC ALJ Heep issued a Decision in which she stated the following Conclusion of Law, "The Complainant has established that installation of a smart meter attached to her home would exacerbate ill health effects. 66 Pa.C.S. § 701; 66 Pa.C.S. § 1501; 52 Pa. Code § 57.194." and issued the following Order, "That Maria Povacz's claim that her health would be adversely affected by the installation of a smart meter attached to her home is granted."

- It is a material fact that, currently, based on the same issues that the Complainants are raising in our Complaint, there are numerous lawsuits that have been filed against the PA PUC and Pennsylvania electric utilities in Commonwealth Court challenging the forced universal deployment of Smart Meters on their domiciles and properties brought by:

- Antonio Romeo (489 CD 2016)  
in which a decision by the PA PUC to dismiss Antonio Romeo's complaint was reversed by the Commonwealth Court
- Mary Paul (460 CD 2019)
- Maria Povacz (492 CD 2019)
- Laura Sustein Murphy (606 CD 2019)
- Cynthia Randall - Paul Albrecht (607 CD 2019)
- Evangeline Hoffman-Lorah (712 CD 2019)
- Alan Schmukler (1102 CD 2019)
- Alexia and Lawrence McKnight (1253 CD 2019)
- Richard Myers (1337 CD 2019)
- Willard Sunstein (to be assigned)  
has filed a Notice of Appeal with Commonwealth Court

- It is a material fact that, as of August 1, 2018, there were at least 38 states in which state agencies and/or public utilities that have officially provided either opt-ins or opt-outs to smart meter installation due to health, safety, privacy, security, performance, and legal issues including: Arizona, Alabama, California, Florida, Georgia, Hawaii, Idaho, Illinois, Indiana, Iowa, Kentucky, Louisiana, Maine, Maryland, Massachusetts, Michigan, Minnesota, Mississippi, Missouri, Nevada, New Hampshire, New Mexico, New York, North Carolina, Ohio, Oklahoma, Oregon, Rhode Island, South Carolina, Tennessee, Texas, Utah, Vermont, Virginia, Washington, West Virginia, Wisconsin, Wyoming. So, to this significant degree in the country, the legal right to choice, safety, privacy, security, and well-being has been settled.

The Complainants request that Judicial Notice be taken of these material facts.

7. In your March 14, 2019 Interim Order, for one, Your Honor recognized and accepted the issues being raised by the Complainants in our Formal Complaint and our five (5) New Matters [which elaborate on DLC Itron Smart Meter Operation and Concerns {New Matter [#1] - January 24, 2017}, PA PUC error in interpreting and implementing Act 129 {New Matter #2 - January 27, 2017}, Health and Safety Issues {New Matter #3 - February 3, 2018}, Constitutional Violations {New Matter #4 - February 14, 2018}, and Commonality of DLC Itron Meter with other Meters and Meshes {New Matter #5 - January 24, 2019}, and our Response to Respondent's Motion for Summary Judgment - July 6, 2018), along with their included exhibits, stating:

- Michele Hriadil and Francis Hriadil (Complainants) filed a Formal Complaint (Complaint) with the Pennsylvania Public Utility Commission (Commission) against Duquesne Light Company (Respondent or Company) on October 3, 2016, alleging, inter alia, the existence of reliability, safety or quality problems with their electric service and objecting to the, the existence of reliability, safety or quality problems with their electric service and objecting to the installation of a smart meter in their home. Complainants essentially aver that smart meters are unsafe, present privacy concerns, are vulnerable to cyber threats, are inferior in quality to analog meters and present serious health concerns. Complainants further aver that there is a correlation to radio frequency (RF) exposure to neurological, cardiac, and pulmonary disease, as well as reproductive and developmental disorders, immune dysfunction, cancer and other health conditions. Complainants aver that the young and elderly populations, are particularly susceptible to these harmful effects and that Complainants are elderly and suffer from chronic conditions. Complainants aver that the smart meters are not certified by underwriters laboratories, there is a potential for the meters to explode, are the meters are not always installed by certified electricians and that fires have been caused by the quality of meter construction and the lack of evaluations and inspections. Complainants also object to the cost of implementing and installing the meters. As relief, Complainants request that the Commission order Respondent to forego installation of a smart meter at their residence.”
- “On January 24, 2017, Complainants filed a document entitled "New Matter and a separate document entitled "Correction to Pulse Table in Complainants Response to ANSWER AND NEW MATTER TO FORMAL COMPLAINT". On January 27, 2017, Complainants filed a document entitled "NEW MATTER #2". Respondent filed a letter dated February 2, 2017, in response to the filings by Complainants on January 24, 2017 and January 27, 2017.  
  
On February 3, 2017, Complainants filed a document entitled "NEW MATTER #3". On February 14, 2017, Complainants filed a document entitled "NEW MATTER #4".”

- "Complainants further assert that they interpret Act 129 as permitting smart meter installation when a customer requests and agrees to pay for the installation and that Complainants have not made any such request. Complainants appear to assert that they intend to present evidence of the legislative history of Act 129 to support their interpretation of the law."

The Respondent cannot now claim that these are extraneous, irrelevant, or confusing with regard to the Complainants' Formal Complaint in its entirety, and the matters at hand.

8. Second, in its Motion... the Respondent specifically attempts to argue / re-argue four (4) points - the same arguments it put forward in its three (3) previous filings: (See para. 3.)

- (1) Relevancy.
- (2) Confusing the issues, wasting time, and needlessly presenting cumulative evidence.
- (3) Hearsay.
- (4) Improperly attempting to raise legal arguments.

Complainants will address each in turn. Complainants will try, to the degree possible, to keep our responses brief, concise, and to the point.

(1) Relevancy.

9. The Respondent asserts that Complainants' "documents add nothing to determining whether Duquesne Light has violated the Code, a regulation, or its tariff."

Further, the Respondent purports a violation of 52 Pa. Code § 5.401 and Pennsylvania Rules of Evidence 401 and 402, yet fails to demonstrate or establish where and how a violation has occurred.

10. First, concerning violations of the Code, a regulation, or its tariff, the Respondent apparently fails to acknowledge, or wishes to ignore, such codes as 66 Pa.C.S. § 701; 66 Pa.C.S. § 1501; 52 Pa. Code § 57.194. To refresh the memory of the Respondent,

66 Pa. C.S. § 1501

**Every public utility shall furnish and maintain adequate, efficient, safe, and reasonable service and facilities, ... as shall be necessary or proper for the accommodation, convenience, and safety of its patrons, ... (emphasis added)**

52 Pa. Code § 57.194.

- (a) An EDC shall furnish and maintain adequate, efficient, safe and reasonable service and facilities, and shall make repairs, changes, alterations, substitutions, extensions and improvements in or to the service and facilities necessary or proper for the accommodation, convenience and safety of its patrons, employees and the public. (emphasis added)
- (b) An EDC shall install, maintain and operate its distribution system in conformity with the applicable requirements of the National Electrical Safety Code.

The Respondent again fails to acknowledge, and wishes to ignore, these regulations and the material fact that in PA PUC Docket No. C-2015-2475023, on January 26, 2018, ALJ Heep issued a Decision in which she stated the following Conclusion of Law,

"The Complainant has established that installation of a smart meter attached to her home would exacerbate ill health effects." in violation of 66 Pa.C.S. § 701; 66 Pa.C.S. § 1501; 52 Pa. Code § 57.194." and issued the following Order, "That Maria Povacz's claim that her health would be adversely affected by the installation of a smart meter attached to her home is granted."

And, the Respondent also apparently fails to acknowledge, or wishes to ignore, other relevant regulations and restrictions such as the FCC Grants of Equipment Authorization for its SK9AMI7 900 MHz LAN and its 802.15.4 2.4 GHz ZigBee Module, and the fact that the PA PUC Implementation Order must reflect and adhere strictly to Act 129 and the intention of the legislators who passed that law, as well as the freedoms and protections guaranteed to the people of Pennsylvania.

11. Codes, regulations, laws, etc. such as these are relevant to and form the basis for Complainants' Formal Complaint, and our request for relief, as Complainants have arranged for the participation of various recognized, independent, and credentialed experts and witnesses, and accumulated a substantial amount of foundational and corroborating evidence to establish that the Respondent is in violation of these specified codes, regulations, and laws, at a minimum.

12. It is an inescapable material fact that the PA PUC has officially recognized that exposure to the emissions of a Smart Meter has caused and can cause harm, that the Complainants are both elderly, that Francis Hriadil has established that he has a number of

clinical health conditions, and that Francis Hriadil's doctor, Dr Martin Gallagher, has submitted a medical statement concerning treatment indicating that Francis Hriadil's clinical conditions will be exacerbated by continuous long-term exposure to the Smart Meter emissions. Complainants out-of-state expert witnesses, Dr David Carpenter MD and Dr Andrew Michrowski PhD have also submitted expert statements supporting the Complainants request for relief.

13. The Respondent has already made their argument purporting the irrelevance and inadmissibility of Complainants' evidence in its June 4, 2018 Motion for Summary Judgment, which You Honor denied *in toto* in Your November 30, 2018 Interim Order Denying Motion for Summary Judgment Filed by Duquesne Light Company. The Respondent is attempting to revisit that same issue here again in their Motion in Limine ... , making the same arguments that it made in its Motion for Summary Judgment, which again is forcing the Complainants to take time away from fully preparing for our Hearing.

14. To reiterate, the basis for Respondent's relevancy argument is that Respondent claims that the body of evidence filed by the Complainants "*do(es) not relate to Duquesne Light or its smart meter program.*" Complainants respectfully submit that this assertion is illogical and completely without merit. There is nothing patently unique or exclusive to the Respondent's Smart Meter program and how it is being operated.

15. The Respondent only makes this claim; but, has never established that its SK9AMI7 Smart Meter program in its Smart Mesh is in any way special or patently unique and superior in form, fit, function, or operation to other similar programs, nor has it provided any evidence, for example, that its privacy and security measures are superior to, or even measure up to, the extensive security measures incorporated by the government and private industry who have suffered many significant, costly, and harmful breaches, which have been reported in

the press and various industry journals and which the Respondent considers to be irrelevant. The Respondent has presented no analysis, testing, data, or statistics justifying or substantiating its claim.

16. The Respondent asserts great commonality with its current analog meters that it wants to replace, yet, disavows any commonality with other similar emitting smart meters and programs being implemented in other locations. Physics operates no differently in Pennsylvania than anywhere else in the country or the world. Pennsylvanians possess no greater immunity to the deleterious effects of the RF and LF emissions caused by emitting Smart Meters, such as the Respondent's Smart Meter, etc., that are being increasingly studied, recognized, and reported by respected experts, agencies, and institutions, both private and governmental, throughout the country, and the world. Further, it has been established (which Complainants' body of evidence shows and to which our expert witnesses will attest) that long term exposure to these types of emissions is eventually detrimental to everyone, and that there exist many categories/classes of people such as children (such as those of Complainants' relatives and friends), pregnant women (such as those of Complainants' relatives and friends), the elderly (such as the Complainants, their relatives, and their friends), and those with various chronic clinical conditions (such as the Complainants, their relatives, and their friends) who are especially susceptible to harm from the on-going and unceasing exposure to such devices and systems. Per 66 Pa.C.S. § 1501; 52 Pa. Code § 57.194, these categories/classes of people cannot be ignored and must be accommodated by law. This evidence is not irrelevant, and these people are not irrelevant.

17. On the subject of commonality, as Complainants have established, in our filings, etc., there is substantial commonality between the Respondent's Smart Meter and its operation in its Smart Mesh, and other similar programs being implemented in other locations, many of which are being implemented on a voluntary basis. The Respondent utilizes an

Itron / Centron OpenWay Smart Meter that is being utilized by other EDCs in a Smart Mesh.

Where there are pertinent differences of note, the Complainants have made a conscientious effort to point those out.

Specifically, the material and foundational facts are:

- the Respondent's Itron/Centron OpenWay SK9AMI7 meter is a wireless, digital Smart Meter with co-located transceivers operating at 900 MHz and 2.4 GHz, respectively, in a Smart Mesh. Their Smart Meter draws power from the electric service line via a Switch Mode Power Supply (SMPS), and it is constructed primarily of electronic components and various plastic and polymer materials, etc. Though there may be some superficial differences between various Smart Meters currently in use in a Smart Mesh, they all operate fundamentally the same way and obey the same laws of physics.
- the specific Itron/Centron OpenWay SK9AMI7 Smart Meter being deployed by the Respondent in a Smart Mesh, is also being deployed in Smart Meshes by other Pennsylvania EDCs such as FirstEnergy in Pennsylvania, and by other EDCs elsewhere, such as FortisBC Energy Inc. in British Columbia, etc.
- the Respondent has stated in its Smart Meter Technology installation plan, the "Duquesne Light Company Final Smart Meter Technology Procurement and Installation Plan" Docket Nos. P-2012- M-2009-2123948, presented to the Commission that it has structured its SK9AMI7 Smart Meter deployment in the same manner as several EDCs in California, Nevada, and Illinois. (See Complainants' New Matter #3.)

18. Furthermore, the Complainants wish to remind the Respondent, and also Your Honor, that the Respondent has submitted as relevant evidence in its favor, various reports such as that by the California Council of Service and Technology (CCST), for example, (see Respondent's Answer and New Matter, etc.) purporting the safety of its Smart Meter in its Smart Mesh. Yet, this report did not specifically include the Respondent's Itron/Centron OpenWay SK9AMI7, operating in its Smart Mesh, in its analysis. The Respondent has no qualms about submitting this type of evidentiary report asserting commonality with other Smart Meters, when it suits its purposes and appears to support its Smart Meter program. Actions such as this by the Respondent illustrate the disingenuous nature and hypocrisy of the Respondent when it comes to offering its opinion on the relevancy and admissibility of Complainants' documentary

evidence. It is noted that Complainants assembled evidentiary documentation that this CCST report was flawed and has been discredited.

19. The Complainants wished to establish the inherent commonality of the Respondent's Smart Meter with other such similar devices beyond any doubt with our New Matter #5 (dated January 24, 2019) and our Petition / Motion to Compel Respondent to Supply Its Smart Meter for Examination (dated February 27, 2019). The Respondent vigorously opposed this motion and effort, but in the Respondent's Response to Petition/Motion to Compel Respondent to Supply its Smart Meter for Examination (dated March 19, 2019), the Respondent eventually admitted in the top paragraph on page 2 that

'...Duquesne Light has never asserted that its smart meters are "separate and distinct" from all other smart meters.'

The Respondent cannot have it both ways.

20. It is a material fact that the Itron Openway Smart Meter and its Smart Mesh possesses the same operational, functional, structural, and material characteristics, vulnerabilities and flaws, etc. that have been identified and are inherent in other Smart Meters, Smart Meshes, and similar devices. As one example, the Itron OpenWay Smart Meter has been involved in residential fires, and the Complainants are providing evidentiary documentation of this fact. Consequently, the evidentiary documentation and testimony that the Complainants intend to introduce is relevant and appropriate to the matter at hand.

21. Concerning Pennsylvania Rules of Evidence 401 and 402,  
Rule 401. Test for Relevant Evidence.

Evidence is relevant if:

- (a) it has any tendency to make a fact more or less probable than it would be without the evidence; and
- (b) the fact is of consequence in determining the action.

Rule 402. General Admissibility of Relevant Evidence

Relevant evidence is admissible unless any of the following provides otherwise: the United States Constitution; a federal statute; these rules; or other rules prescribed by the Supreme Court.

The body of evidence which supports Complainants' Formal Complaint, and the testimony of our expert witnesses, make the facts to be presented more, not less, probable than would be the case without that evidence. And, those facts are relevant, admissible, and of primary consequence in determining the truth of the matter, and a fair and just outcome for the Complainants. Furthermore, this body of evidence does not violate the United States Constitution, ..., or other rules prescribed by the Supreme Court.

(2) Confusing the issues, wasting time, and needlessly presenting cumulative evidence.

22. As stated in You Honor's Prehearing Orders

"Complainants bear the burden of proof and must demonstrate by a **preponderance of the evidence** that Respondent violated its tariff, the Public Utility Code, or a commission order or regulation, and that they are entitled to the relief requested in the Complaint." (**emphasis added**)

The Complainants are obligated to meet this burden of proof. The Respondent's motion is clearly intended to preclude the submission of pertinent evidentiary documentation, which is relevant and admissible, to either prevent the occurrence of any Hearing for the Complainants, or to so critically hamper the Complainants' efforts that it guarantees we cannot meet our burden of proof. All of the documentation that has been submitted to the Respondent in Discovery and intended for submission into evidence has a direct bearing on the issues of our Formal Complaint. To endorse this on-going effort on the part of the Respondent to circumvent the truth would be extremely prejudicial against the Complainants and our complaint.

23. The Respondent complains of the Complainants' evidence as being "cumulative and repetitious". The evidentiary documentation that has been assembled comes from different and separate experts and sources, all of which have been carefully reviewed, referenced, and vetted for relevance, etc., and provides overwhelming correlation and corroboration of the facts being presented.

What the Respondent asserts is cumulative and repetitive, the Complainants' assert is

correlative and corroborative, and represents the preponderance of evidence that Your Honor has stated is required.

24. The Respondent asserts that this is "wasting time." The Complainants ask, who's time is it wasting? The Respondent clearly feels that it is wasting its time because the Respondent does not want to have to face the facts, and deal with the consequences.

The Respondent's repetitious nuisance motions are clearly wasting the Complainants' time, because we have to take precious time away from properly preparing for our Hearing to respond to the Respondent's repetitive motions.

Is the court's or the Commonwealth's time being wasted? The Complainants assert that it is not. The PA PUC exists as a government agency, as a part of the state government of Pennsylvania which is sworn to protect the well-being of its people, and uphold the Constitutions of Pennsylvania and the United States. It exists, as its mission statement declares, to balance the needs of consumers and utilities (not rubber stamp the desires of the utilities); ensure safe and reliable utility service at reasonable rates (not the preferences of the utilities); to protect the public interest (not the interest of the private sector); to educate consumers to make independent, informed utility choices (which the Complainants are making great effort to try to accomplish here for their own health and well-being); and, to foster new technologies and competitive markets in an environmentally sound manner (not in a manner that worsens the natural living environment and well-being of the people of Pennsylvania).

25. If the Respondent is so concerned with wasting the time of the court and the Commonwealth of Pennsylvania, they can simply stipulate to the Complainants' ages, clinical conditions, and the public evidentiary documents that Complainants have supplied. This would expedite this whole process, and allow the Complainants to receive a fair and just resolution of our Formal Complaint and request for relief. This is what the Complainants would reasonably expect from any conscientious corporate citizen of Pennsylvania who listens to, cares about,

and responds to the needs of its customers. Instead, the Respondent continues with its repeated ongoing attempts to forestall the submission of all relevant evidence, substantially dragging out the Hearing process, etc. We guess it would be naive for the Complainants to have expected the Respondent to appeal to the PA PUC, along with and in support of the Complainants, to address and accommodate our needs, and grant our legitimate request for relief.

26. The Respondent asserts that this is all a big inconvenience and a big waste of time, because in its view “all the issues have been addressed” when the truth of the matter is that they have not been properly and fully addressed.

There are glaring problems that have come to light about this technology that have been overlooked, that have not been properly considered, and that remain unaddressed, all to the detriment of Pennsylvania and its people, including the Complainants. It is only a “waste of time” to the Respondent, as it wishes to evade that truth, and maximize its returns and profits. Anything that does not maximize its profits is a waste of time for the Respondent.

27. Finally, the Respondent asserts that the Complainants body of evidence confuses the issues at hand. There is nothing in the documentation supplied by the Complainants that is extraneous or irrelevant. On the contrary, everything that the Complainants have submitted brings all of the issues into sharp focus when considering Codes and regulations, such as but not limited to 66 Pa.C.S. § 1501 and 52 Pa. Code § 57.194, etc. Complainants’ aver that this body of documentary evidence is correlative, corroborative, relevant, and satisfies our obligation of preponderance. There is a great deal more supportive documentation available that the Complainants could have chosen to submit as well; but, we choose to limit our submissions for *practical* reasons. Everything that has been submitted is directly relevant to the specifics of the matters at hand in our Formal Complaint. The Complainants have taken great pains to eliminate extraneous material; have only submitted

documentation that has been researched, referenced, and vetted for its relevance, that has been corroborated by multiple established sources, and has been supplied and referred to the Complainants by their authors. The great amount of relevant documentation that exists speaks volumes to its importance; it does not justify the Respondent's assertion that its inclusion is needless or cumulative. It establishes a comprehensive body of corroborative material and foundational facts, as well as a pattern of evidence, that cannot simply be ignored or dismissed. And, it, along with the testimony of the Complainants' independent expert witnesses, establishes the preponderance of evidence that Your Honor has stated is required.

(3) Hearsay.

28. The Respondent has already made their argument concerning Hearsay in its June 4, 2018 Motion for Summary Judgment, which You Honor denied *in toto* in Your November 30, 2018 Interim Order Denying Motion for Summary Judgment Filed by Duquesne Light Company. The Respondent is attempting to revisit that same issue here again in their Motion in Limine ..., making much the same arguments that it made in its Motion for Summary Judgment, which again is forcing the Complainants to take time away from fully preparing for our Hearing.

29. As already explained in Complainants' response to Respondent's Motion for Summary Judgment, the Supreme Court of Pennsylvania Committee on Rules of Evidence has published that "the admissibility of evidence is conditioned upon the proof of foundational facts," which the Complainants' evidentiary documentation, sponsored and to be testified to by our expert witnesses, provides.

30. In its Motion for Summary Judgment, the Respondent made the generic and dismissive reference that material served by the Complainants was obtained from the internet. Now, in its Motion in Limine..., the Respondent makes an opposite generic and dismissive reference to the material served by the Complainants as "not being written or created by the

Complainants or our participating expert witnesses.” Of course, the Complainants, nor our participating expert witnesses, did not and could not have generated all of this evidentiary material on their own, however their review and understanding of this authoritative material forms the basis of their expert views and, by Pennsylvania law, cannot be ignored. To expect the Complainants and its participating witnesses to have done so is ridiculous. The evidentiary documentation supplied by the Respondent was not all generated by Duquesne Light Company (DLC) directly. It was supplied by Itron, and other sources.

31. In addition to the material that was created or directly generated by the Complainants and our participating expert witnesses, this material has been produced by the Complainant’s doctor, and by respected and recognized independent experts and world authorities, as well as by government and private agencies and institutions, throughout the country and the world. The material not generated by the Complainants or our doctor, have all been published, and are public documents that are part of the public record. The Complainants’ had no influence or part in their making, the facts that they present, nor the conclusions that they reach.

32. The Respondent has routinely and generically referred to these simply and derogatorily as “internet articles”, etc. and attempts in one broad stroke to denigrate, in their entirety, their accuracy, reliability, validity, and applicability. Complainants wish to reiterate the fact that many of the world's biomedical research, scientific, engineering, security, economic, governmental agency, law, etc. journals now publish online exclusively. They have abandoned hard copy entirely. All government agencies, including Public Utility Commission, have internet websites for the dissemination of information. The reasons for this are that publication online is less expensive and greatly enhances accessibility to the audiences for these publications, and for this information. Complainants respectfully submit that individual sources of information need to be judged solely by their quality and merit, and not simply by their method of delivery.

Inaccuracies and misprints are possible no matter what medium is utilized. And, truth and accuracy is not automatically in question just because a source material may have been obtained from the internet. Unlike, hardcopy media, mistakes in source material on the internet are subject to much more substantive review, and are readily updatable and correctable.

33. The Complainants have provided filed public documents composed of official public records; government, scientific, medical, and health reports and publications; investigative news and industry reports; expert reports and testimonies; various Utility Commission records; peer-reviewed scientific reports; medical records; doctor recommendations; Congressional, Legislative, Judicial, and Executive hearing records, EDC documents and public statements, industry reports, official institution and agency releases, etc., most in written format and some in video format, to substantiate our claims and Formal Complaint.

This written and video documentation was fully reviewed, sourced, and referenced. The foundational facts presented in this material have been verified via multiple sources, providing corroboration. They have either been accepted into evidence in prior judicial court cases, public hearings, etc. by various commissions (including the PA PUC), legislatures, and or congressional committees, etc. or fall within the admissibility guidelines established by:

Title 66, Part I. Pa. Public Utility Code

66 Pa. Chapter 3, Subchapter B. Investigations and Hearings

66 Pa. C.S. § 332 (b) - Admissibility of evidence

66 Pa. C.S. § 332 (c) - Submission of evidence

Federal Rules of Evidence: 801-03, 901

Rule 803. Hearsay Exceptions; Availability of Declarant Immaterial

Rule 901. Requirement of Authentication or Identification

52 Pa. Chapter 5, Subsection E, Evidence and Witnesses

Section § 5.401 - Admissibility of evidence

Section § 5.406 - Public documents

Section § 5.407 - Records of other proceedings.

39. The testimony of Complainants' expert witnesses, along with the correlative and corroborative body of evidence the Complainants intend to submit into evidence, which have been fully and properly served to the Respondent and the PUC, possess substantial probative value and serve as a sound legal foundation for a finding of fact.

40. The body of evidence intended for submission by the Complainants, and served to the Respondent and the PUC, is relevant and material to the matter at hand. It is correlative and corroborative within itself. And, it is correlative and corroborative with and substantiates the testimony to be provided in support of and on behalf of the Complainants at our Hearing. Taken together with the planned testimony, it presents the preponderance of evidence that Your Honor has stated is required. It provides substantial probative value. It "represents" a danger of "unfair prejudice" only if the foundational facts and the truth also "represent" a danger of "unfair prejudice." It brings all of the pertinent issues into sharp focus when considering Codes and regulations such as but not limited to 66 Pa.C.S. § 1501 and 52 Pa. Code § 57.194, etc. And, it does not represent a waste of time on the part of the Commonwealth of Pennsylvania and the PA PUC, who exist to serve the people.

41. The nature of Smart Meters and Smart Meshes, and the consequences of their operation, is an involved subject, but it is a very critical one that is important to the well-being, rights, and future of the Complainants, and the people of Pennsylvania and this country. To fully understand the multitude of issues and their significant implications and consequences, one must consider the full scope of all of the events and the interdisciplinary analyses and evaluations that have occurred to date, and not exclude or preclude pertinent and relevant information or material based on some flimsy pretext. To do otherwise would be a betrayal of the mandate that the PA PUC serves under, and the people of Pennsylvania for whom it was created and it exists to serve.

42. In conclusion, the Complainants re-iterate that the body of evidentiary documentation to be submitted by the Complainants, simply listed but not detailed by the Respondent, consists of:

- evidentiary documentation specific to the Itron/Centron OpenWay SK9AMI7 Smart Meter being utilized by Duquesne Light Company in its Smart Mesh.
- evidentiary documentation germane to all Smart Meters operating in a Smart Mesh, and with which the Duquesne Light Company shares a high degree of commonality.
- evidentiary documentation from Francis Hriadil's doctor, Dr. Martin Gallagher, indicating his medical recommendation and treatment that Francis Hriadil has clinical conditions which will be exacerbated, at a minimum, by continuous long-term exposure to the Smart Meter emissions.
- evidentiary expert reports by Complainants expert witnesses
- evidentiary public documents and records from recognized experts (along with their curriculum vitae), agencies, institutions, etc., both government and private
- evidentiary peer-reviewed scientific studies and reports.
- evidentiary testimony and exhibits already accepted into evidence in other proceedings before the PA PUC, etc.

which are all being sponsored by our participating expert witnesses, who will be available to testify to, and undergo cross-examination on, their content and relevance. The Complainants have read/viewed, understand, and agree with this material we are presenting. And, the Complainants aver, and stand ready to justify, each and every evidentiary document to be submitted into evidence, which has been submitted to the Respondent and the PUC, that it and they are admissible, relevant, and material to the Complainants' Formal Complaint, and the matter at hand.

43. Again, the Complainants wish to point out that the Respondent, Duquesne Light with revenues ~ \$806,100,000, net income ~ \$69,600,000, total assets ~ \$2,209,200,000, and being represented Tucker-Arensberg, Attorneys. In comparison, the Complainants are two (2) elderly fixed income individuals, one (1) working full-time and one (1) retired, representing themselves pro se, who do not possess even a fraction of one percent of the revenues, net income, total assets, and resources available to the Respondent. The disparity here is glaring. For the Respondent to continue to attempt to leverage their unmatched resources in this way,

with repetitious and cumulative nuisance motions such as this is unfair, unreasonable, and imposes an unfair burden, etc. on the Complainants in violation of PA Code § 5.361(a)(2).

To condone this activity would be prejudicial against the Complainants, our complaint, and our conscientious effort to present all of the relevant foundational facts to meet our burden of proof. And, it would prevent Your Honor and the Commission from getting the full and complete truth concerning the matters at issue.

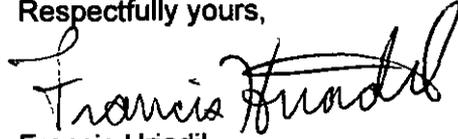
44. The testimonies to be provided by the Complainants and their independent expert witnesses, in conjunction with the evidentiary documentation Complainants intend to place into evidence, will definitively establish that this is a matter of direct and detrimental physical and personal consequence to the Complainants, and a matter that is in the public interest, and will definitively provide the preponderance of evidence that Your Honor has stated is required.

WHEREFORE, in light of these circumstances, Complainants aver that our evidentiary documentation is relevant and admissible, that the Respondent's claims and arguments to preclude Complainants from introducing or referencing any of the documents, videos, or things the Respondent listed in their Exhibit A at the hearing are without merit, and have already been argued to large degree in Respondent's Motion for Summary Judgment (which also argued to disregard / discard / narrow our evidentiary documentation and our complaint) and been denied.

Complainants Michele Hriadil and Francis Hriadil therefore respectfully request that the Respondent's October 28, 2019 Motion in Limine to Bar Complainants From Introducing or Relying Upon Inadmissable Evidence, which is the third (3rd) filing of this same Motion in Limine, be denied.

Complainant's response and Certificate of Service have been filed with the Commission's Secretary, in accordance with Commission Regulations.

Respectfully yours,

A handwritten signature in black ink that reads "Francis Hriadil". The signature is written in a cursive style with a large, looping initial "F".

Francis Hriadil  
(412) 779-3314  
331 Shady Ridge Drive  
Monroeville, Pennsylvania  
November 6, 2019

RECEIVED

NOV 06 2019

PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

**= [ Exhibit A ] =**

Exhibit No.	Complainants' Exhibit Title	Date	Admissibility Citations and Sponsor(s)
A-1	Francis Hriadil's Confidential Personal and Family Medical Records	2018.1.29	Confidential Hospital Records PARE 803(4) - Statement Made for Medical Diagnosis or Treatment
A-2	Statement and Medical Recommendation for Francis Hriadil by his doctor, Dr. David Gallagher MD	2018.4.24	PARE 803(4) - Statement Made for Medical Diagnosis or Treatment Expert Witness - Dr David Carpenter MD
A-3	Dr David Carpenter MD Expert Statement to PA PUC for Hriadils Docket No C-2016-2571726	2017.10.22	Expert Witness - Dr David Carpenter MD
A-4	A-4 Dr Michrowski Andrew PhD Expert Statement to PA PUC for Hriadils Docket No C-2016-2571726	2018/11.30	Expert Witness - Andrew Michrowski PhD
A-5	Dr Tania Slawecki PhD Affidavit - Expert Opinion on EMF Exposure and Smart Meters - Research Associate at the Materials Research Institute Penn State University	2019.07.27	Expert Witness - Dr David Carpenter MD Expert Witness - Andrew Michrowski PhD Expert Witness - Dr David Carpenter MD
A-6	Smart Meter Technology, DLC's Smart Meter, and the Smart Meter Program in Pennsylvania - Summary Overview - 2019 Francis Hriadil MS	2019.10.21	Expert Witness - Dr David Carpenter MD Expert Witness - Andrew Michrowski PhD Expert Witness - Francis Hriadil MS
B-1	Expert Report / Statement - Francis Hriadil, MS	2019.7.10	Expert Witness - Francis Hriadil MS
B-2	Francis Hriadil's Curriculum Vitae	2019.7.10	Expert Witness - Francis Hriadil MS
B-3	Comparison Carried Out by Francis Hriadil of What the FCC Did and Did Not Do	2017.1.24	Expert Witness - Francis Hriadil MS
B-4	Analysis Carried Out by Francis Hriadil of the Pulse Transmissions of the SK9AMI7	2017.1.24	Expert Witness - Francis Hriadil MS
B-5	Meter Comparison by Francis Hriadil of a Non-emitting Analog Meter and the Wireless Smart Meter	2017.1.24	Expert Witness - Francis Hriadil MS
B-6	New Matter 1 - DLC Itron Smart Meter Operation and Concerns	2017.1.24	PA PUC filed document, C-2016-2571726 - ITRON Smart Meter Expert Witness - Francis Hriadil MS
B-7	New Matter 2 - PA PUC overreach of Act 129	2017.1.27	PA PUC filed document, C-2016-2571726 Expert Witness - Francis Hriadil MS
B-8	New Matter 3 - Health and Safety Issues	2017.2.3	PA PUC filed document, C-2016-2571726 - ITRON Smart Meter Expert Witness - Francis Hriadil MS Expert Witness - Andrew Michrowski PhD Expert Witness - Dr David Carpenter MD
B-9	New Matter 4 - Constitutional Violations	2017.2.14	PA PUC filed document, C-2016-2571726 Expert Witness - Francis Hriadil MS
B-10	New Matter 5 - Commonality of DLC Itron Meter with other Meters and Meshes	2019.1.24	PA PUC filed document, C-2016-2571726 - ITRON Smart Meter, Expert Witness - Francis Hriadil MS Expert Witness - Andrew Michrowski PhD
B-11-1	Response to Motion for Summary Judgment	2018.7.6	PA PUC filed document, C-2016-2571726 - ITRON Smart Meter Expert Witness - Francis Hriadil MS Expert Witness - Andrew Michrowski PhD Expert Witness - Dr David Carpenter MD
B-11-2	Response to Motion for Summary Judgment Exhibit List	2018.7.6	PA PUC filed document, C-2016-2571726 Expert Witness - Francis Hriadil MS
B-12	Respondent DLC Discovery Responses to Complainants' Discovery 1	2017.11.11	Supplied by DLC Expert Witness - Francis Hriadil MS Expert Witness - Andrew Michrowski PhD Expert Witness - Dr David Carpenter MD
B-13	Complainants' Motion to Compel Discovery	2018.2.20	PA PUC filed document, C-2016-2571726 Expert Witness - Francis Hriadil MS Expert Witness - Andrew Michrowski PhD Expert Witness - Dr David Carpenter MD
B-14-1	Respondent DLC's Compelled Discovery Responses	2018.4.13	Supplied by DLC Expert Witness - Francis Hriadil MS Expert Witness - Andrew Michrowski PhD

= [ Exhibit A ] =

			Expert Witness - Dr David Carpenter MD
B-14-2	DLC Smart Meters returned to DLC - RTU Numbers as of 4-13-18	2018.4.13	Supplied by DLC Expert Witness - Francis Hriadil MS Expert Witness - Andrew Michrowski PhD
B-15	Answer to Respondent's Response to Motion to Compel Respondent to Supply Its Smart Meter for Examination	2019.3.29	PA PUC filed document, C-2016-2571726 Expert Witness - Francis Hriadil MS Expert Witness - Andrew Michrowski PhD
C-1	Expert Report / Statement - Dr David Carpenter MD	2019.7.10	Expert Witness - Dr David Carpenter MD
C-2	Dr David Carpenter MD Curriculum Vitae	2019.7.10	Expert Witness - Dr David Carpenter MD
C-3	Setting Prudent Public Health Policy for Electromagnetic Field Exposures; David O. Carpenter, Cindy Sage; Reviews on Environmental Health, Volume 23, Nol. 2, 2008; 310 REH-EMF	2008	Expert Witness - Dr David Carpenter MD Expert Witness - Andrew Michrowski PhD Expert Witness - Francis Hriadil MS
C-4	Thermal and non-thermal health effects of low intensity non-ionizing radiation: An International Perspective; Dominique Belpomme, Lennart Hardell, Igor Belyaev, Ernesto Burgio, David O. Carpenter; Environmental Pollution; 6 July 2018; 439 Thermal and non-thermal	2018.7.6	Expert Witness - Dr David Carpenter MD Expert Witness - Andrew Michrowski PhD Expert Witness - Francis Hriadil MS
D-1	Expert Report / Statement - Andrew Michrowski, PhD	2019.7.10	Expert Witness - Andrew Michrowski PhD
D-2	Andrew Michrowski, PhD Curriculum Vitae	2019.7.10	Expert Witness - Andrew Michrowski PhD
D-3	Electromagnetic fields - High-level microwave technology concerns	2009	Expert Witness - Andrew Michrowski PhD Expert Witness - Dr David Carpenter MD
D-4	EMF - NRC 1970s graph - possible mechanisms of mw interaction with biosystems	1970	Expert Witness - Andrew Michrowski PhD Expert Witness - Dr David Carpenter MD PARE 803(16) - Ancient Doc (30* yrs)
D-5	ELECTROMAGNETIC POLLUTION - A Michrowski PhD	1999	Expert Witness - Andrew Michrowski PhD Expert Witness - Dr David Carpenter MD
D-6	PACE flyer memberlist & origin & aims	2018	Expert Witness - Andrew Michrowski PhD
D-7	Dr Michrowski EMF Workshop Description	2011	Expert Witness - Andrew Michrowski PhD
E-1	---not used---		
E-2-1	Paul Dart MD FCA Biological and Health Effects of Microwave Radio Frequency Transmissions Research Literature Review 2013_06_04 FCC Doc 7520940903	2013.6.4	PARE 803(8) - Public Record FRE 803(8) - Public Record Expert Witness - Dr David Carpenter MD Expert Witness - Andrew Michrowski PhD Expert Witness - Francis Hriadil MS
E-2-2	Paul Dart MD FCA Health Effects of Microwave Radio Exposure FCC Doc 7520940904	2013.6.4	PARE 803(8) - Public Record FRE 803(8) - Public Record Expert Witness - Dr David Carpenter MD Expert Witness - Andrew Michrowski PhD Expert Witness - Francis Hriadil MS
E-3	---not used---		
E-4	Captured Agency - How the FCC is Dominated by the Industries It Supposedly Regulates - Norm Alster - Harvard Univ Center for Ethics	2015	Expert Witness - Dr David Carpenter MD Expert Witness - Andrew Michrowski PhD Expert Witness - Francis Hriadil MS
E-5	Inaccurate official assessment of radiofrequency safety by the Advisory Group on Non-ionising Radiation; Sarah J. Starkey; De Gruyter; Rev Environ Health 2016; 31(4): 493-503	2016.10.16	Expert Witness - Dr David Carpenter MD Expert Witness - Andrew Michrowski PhD Expert Witness - Francis Hriadil MS Admitted in PA PUC Docket No C-2015-2474602
E-6	Why We Need Stronger Cell Phone Radiation Regulations - Key Testimony Submitted to the FCC - Dr Moskowitz PhD	2019.10.01	Expert Witness - Dr David Carpenter MD Expert Witness - Andrew Michrowski PhD Expert Witness - Francis Hriadil MS
E-7	American Academy of Environmental Medicine AAEM Recommendations Regarding Electromagnetic and Radiofrequency Exposure	2012.7.12	Admitted in PA PUC Docket No. C-2017-2620710 Expert Witness - Dr David Carpenter MD Expert Witness - Andrew Michrowski PhD Expert Witness - Francis Hriadil MS
E-8	WHO IARC Classifies Radiofrequency Electromagnetic Fields as Group 2B	2011.5.31	Admitted in PA PUC Docket No. C-2017-2620710

**= [ Exhibit A ] =**

			Expert Witness - Dr David Carpenter MD Expert Witness - Andrew Michrowski PhD Expert Witness - Francis Hriadil MS
E-9	American Academy of Pediatrics AAP Statement to Congress Urging RF Energy Protection of Vulnerable Populations	2012.12.12	Admitted in Docket No. C-2017-2620710 Expert Witness - Dr David Carpenter MD Expert Witness - Andrew Michrowski PhD Expert Witness - Francis Hriadil MS
E-10-1	Ronald Powell PHD Testimony to the Maryland General Assembly on the Danger of Smart Meters	2014.12.4	Expert Witness - Dr David Carpenter MD Expert Witness - Andrew Michrowski PhD Expert Witness - Francis Hriadil MS
E-10-2	Ronald Powell PHD Curriculum Vitae	2014.12.4	Expert Witness - Dr David Carpenter MD Expert Witness - Andrew Michrowski PhD Expert Witness - Francis Hriadil MS
E-11	Ronald Powell PHD Symptoms after Exposure to Smart Meter Radiation	2015.03.12	Peer Reviewed - Lamech Federica data Expert Witness - Dr David Carpenter MD Expert Witness - Andrew Michrowski PhD Expert Witness - Francis Hriadil MS
E-12	Ronald Powell PHD Ranking Electricity Meters for Risk to Health Privacy and Cyber Security	2015.11.15	Expert Witness - Dr David Carpenter MD Expert Witness - Andrew Michrowski PhD Expert Witness - Francis Hriadil MS
E-13	Ronald Powell PHD Symptoms Resulting from Exposure to Radiofrequency Microwave Radiation from Smart Meters	2015.11.17	Expert Testimony of Dr Richard H. Conrad, Ph.D to MPUC Docket No. 2011-00262, February 2013, PARE 803(8) - Public Record Expert Witness - Dr David Carpenter MD Expert Witness - Andrew Michrowski PhD Expert Witness - Francis Hriadil MS
E-14	Ronald Powell PHD Annotated References on Wireless Devices and Health	2017.06.04	Expert Witness - Dr David Carpenter MD Expert Witness - Andrew Michrowski PhD Expert Witness - Francis Hriadil MS
E-15	Cindy Sage David Carpenter MD Public Health Implications of Wireless Technologies - Pathophysiology Journal 16 2009 233-246	2009	Expert Witness - Dr David Carpenter MD Expert Witness - Andrew Michrowski PhD Expert Witness - Francis Hriadil MS
E-16	David Carpenter MD et al Smart Meters - Correcting the Gross Misinformation	2012.06.11	Expert Witness - Dr David Carpenter MD Expert Witness - Andrew Michrowski PhD Expert Witness - Francis Hriadil MS
E-17-00	Expert Commentaries Refuting the CCST Report on the Health Impacts of Radiofrequency from Smart Meters	2010, 2011	PARE 803(8) - Public Record FRE 803(8) - Public Record Expert Witness - Dr David Carpenter MD Expert Witness - Andrew Michrowski PhD Expert Witness - Francis Hriadil MS
E-17-01	Eli_Richter MD MPH Asso Prof - CCST final	2011.1.26	Expert Witness - Dr David Carpenter MD Expert Witness - Andrew Michrowski PhD Expert Witness - Francis Hriadil MS
E-17-02	David Carpenter MD - final CCST	2011.1	PARE 803(8) - Public Record FRE 803(8) - Public Record Expert Witness - Dr David Carpenter MD Expert Witness - Andrew Michrowski PhD
E-17-03	Olle Johansson Prof - final to CCST	2011.1.17	PARE 803(8) - Public Record FRE 803(8) - Public Record Expert Witness - Dr David Carpenter MD Expert Witness - Andrew Michrowski PhD Expert Witness - Francis Hriadil MS
E-17-04	Lukas Margaritis Prof et al - Official to CCST	2011.1.16	PARE 803(8) - Public Record FRE 803(8) - Public Record Expert Witness - Dr David Carpenter MD Expert Witness - Andrew Michrowski PhD Expert Witness - Francis Hriadil MS
E-17-05	Sam Milham MD MPH - Critique of CCST	2011.1	PARE 803(8) - Public Record FRE 803(8) - Public Record Expert Witness - Dr David Carpenter MD Expert Witness - Andrew Michrowski PhD Expert Witness - Francis Hriadil MS
E-17-06	Magda Havas BSc, PHD - Report_CCST Smart Meters	2010.10.12	PARE 803(8) - Public Record FRE 803(8) - Public Record Expert Witness - Dr David Carpenter MD

= [ Exhibit A ] =

			Expert Witness - Andrew Michrowski PhD Expert Witness - Francis Hriadil MS
E-17-07	Nancy Evans, Health Science Consultant - CCST Smart Meter report	2011.1.30	PARE 803(8) - Public Record FRE 803(8) - Public Record Expert Witness - Dr David Carpenter MD Expert Witness - Andrew Michrowski PhD Expert Witness - Francis Hriadil MS
E-17-08	Cindy Sage MA - Final CCST Comment Letter	2011.1.17	PARE 803(8) - Public Record FRE 803(8) - Public Record Expert Witness - Dr David Carpenter MD Expert Witness - Andrew Michrowski PhD Expert Witness - Francis Hriadil MS
E-17-09	Raymond_Neutra MD DrPH - CCST	2011.1.30	PARE 803(8) - Public Record FRE 803(8) - Public Record Expert Witness - Dr David Carpenter MD Expert Witness - Andrew Michrowski PhD Expert Witness - Francis Hriadil MS
E-17-10	Janet Newton Pres EMR Policy Institute - 31jan2011 emrpi ccst comment	2011.1.31	PARE 803(8) - Public Record FRE 803(8) - Public Record Expert Witness - Dr David Carpenter MD Expert Witness - Andrew Michrowski PhD Expert Witness - Francis Hriadil MS
E-17-11	Karl Maret BsEE MeBE MD - CCST Commentary 1- 31-2011 final	2011.1.30	PARE 803(8) - Public Record FRE 803(8) - Public Record Expert Witness - Dr David Carpenter MD Expert Witness - Andrew Michrowski PhD Expert Witness - Francis Hriadil MS
E-17-12	Yasuko Kato Journalist Dir MCS EHS Groups Japan	2011.1.29	PARE 803(8) - Public Record FRE 803(8) - Public Record Expert Witness - Dr David Carpenter MD Expert Witness - Andrew Michrowski PhD Expert Witness - Francis Hriadil MS
E-17-13	Daniel Hirsch Senior Nuclear Policy Lecturer UCSC - Comments on CCST Health Effects of RF from Smart Meters	2011.1.31	PARE 803(8) - Public Record FRE 803(8) - Public Record Expert Witness - Dr David Carpenter MD Expert Witness - Andrew Michrowski PhD Expert Witness - Francis Hriadil MS
E-17-14	De-Kun Li MD PHD MPH Senior Research Scientist - Letter CCST - No Proper FCC Standard	2011.3.31	PARE 803(8) - Public Record FRE 803(8) - Public Record Expert Witness - Dr David Carpenter MD Expert Witness - Andrew Michrowski PhD Expert Witness - Francis Hriadil MS
E-18-1	Partial Findings NTP Carcinogenesis Studies of Cell Phone Radiofrequency Radiation in Sprague Dawley SD Rats NIH	2016.05.19	PARE 803(8) - Public Record FRE 803(8) - Public Record Expert Witness - Dr David Carpenter MD Expert Witness - Andrew Michrowski PhD Expert Witness - Francis Hriadil MS Admitted in PA PUC Docket No C-2015- 2475726
E-18-2	Partial Findings NTP Carcinogenesis Studies of Cell Phone Radiofrequency Radiation in Sprague Dawley SD Rats NIH 2016_06_23 full	2016.06.23	PARE 803(8) - Public Record FRE 803(8) - Public Record Expert Witness - Dr David Carpenter MD Expert Witness - Andrew Michrowski PhD Expert Witness - Francis Hriadil MS Admitted in PA PUC Docket No C-2015- 2475726
E-19	ACS Responds to New Study Linking Cell Phone Radiation to Cancer	2016.05.27	Investigative Report Expert Witness - Dr David Carpenter MD Expert Witness - Andrew Michrowski PhD Expert Witness - Francis Hriadil MS
E-20	Joel Moskowitz PHD - SPIN vs FACTS NTP Report on Cancer Risk from Cellphone Radiation Factsheet	2016.05.30	Expert Witness - Dr David Carpenter MD Expert Witness - Andrew Michrowski PhD Expert Witness - Francis Hriadil MS
E-21	Scientific American Major Cell Phone Radiation Study Reignites Cancer Questions - Investigative Report	2016.05.27	Investigative Report Expert Witness - Dr David Carpenter MD Expert Witness - Andrew Michrowski PhD

= [ Exhibit A ] =

			Expert Witness - Francis Hriadil MS
E-22	Christopher Portier retired Head of NTP David Carpenter MD - Exposure to Cell Phone RF Radiation Linked to Tumors	2016.05.27	Expert Witness - Dr David Carpenter MD Expert Witness - Andrew Michrowski PhD Expert Witness - Francis Hriadil MS
E-23-1	Oxidative Mechanisms of Biological Activity of Low Intensity Radiofrequency Radiation - RF Radiation causes DNA Damage - NIH Listings	2016	Expert Witness - Dr David Carpenter MD Expert Witness - Andrew Michrowski PhD Expert Witness - Francis Hriadil MS FRE 803(18) - Learned Treatise PARE 803(18) - Learned Treatise
E-23-2	Oxidative Mechanisms of Biological Activity of Low-Intensity Radiofrequency Radiation 60001122232	2016	Expert Witness - Dr David Carpenter MD Expert Witness - Andrew Michrowski PhD Expert Witness - Francis Hriadil MS FRE 803(18) - Learned Treatise PARE 803(18) - Learned Treatise
E-24	International Appeal - Scientists Call for Protection from Non-ionizing Electromagnetic Field Exposure	2017.11.9	Admitted in PA PUC Docket No. C-2017-2620710 Expert Witness - Dr David Carpenter MD Expert Witness - Andrew Michrowski PhD Expert Witness - Francis Hriadil MS
E-25-1	Samuel Milham MD MPH Direct Testimony before the AZ Corp Commission Docket No E-01345A-16-0123 2017_04_03	2017.04.03	PARE 803(8) - Public Record FRE 803(8) - Public Record Expert Witness Testimony of Samuel Milham MD MPH to AZ Corp Commission Docket No E-01345A-16-0123 Expert Witness - Dr David Carpenter MD Expert Witness - Andrew Michrowski PhD Expert Witness - Francis Hriadil MS
E-25-2	Samuel Milham MD MPH Curriculum Vitae	2017.04.03	PARE 803(8) - Public Record FRE 803(8) - Public Record Expert Witness Testimony of Samuel Milham MD MPH to AZ Corp Commission Docket No E-01345A-16-0123 Expert Witness - Dr David Carpenter MD Expert Witness - Andrew Michrowski PhD Expert Witness - Francis Hriadil MS
E-26-1	Expert Report of Andrew Marino PHD JD to the PA PUC Docket No C-2015-2475726 2016_08_08	2016.08.08	PARE 803(8) - Public Record FRE 803(8) - Public Record Admitted in PA PUC Docket No C-2015-2475726, Dr Marino was an Expert Witness Expert Witness - Dr David Carpenter MD Expert Witness - Andrew Michrowski PhD Expert Witness - Francis Hriadil MS
E-26-2	Andrew Marino MD JD Curriculum Vitae	2016.08.08	PARE 803(8) - Public Record FRE 803(8) - Public Record Admitted in PA PUC Docket No C-2015-2475726, Dr Marino was an Expert Witness Expert Witness - Dr David Carpenter MD Expert Witness - Andrew Michrowski PhD Expert Witness - Francis Hriadil MS
E-27	Smart Meters - What We Know - Itron OpenWay Smart Meter - Environmental Testing and Technology Report 2011_12	2011.12	ITRON SK9AMI7 OpenWay Meter Expert Witness - Dr David Carpenter MD Expert Witness - Andrew Michrowski PhD Expert Witness - Francis Hriadil MS
E-28	Assessment of RF Microwave Emissions from Smart Meters - Sage Associates Report	2011.01.01	Expert Witness - Dr David Carpenter MD Expert Witness - Dr David Carpenter MD Expert Witness - Andrew Michrowski PhD Expert Witness - Francis Hriadil MS
E-29	---not used---		
E-30	ITRON - SK9AMI7 and 802.15.4 ZigBee Module - FCC Grants of Equipment Authorization. 06/15/2012 and 10/30/2006, respectively	2012.6.15 2006.10.30	PARE 803(8) - Public Record FRE 803(8) - Public Record Expert Witness - Dr David Carpenter MD Expert Witness - Andrew Michrowski PhD Expert Witness - Francis Hriadil MS
E-31	The 1998 Wingspread Conference Precautionary Principle	1998	Expert Witness - Dr David Carpenter MD Expert Witness - Andrew Michrowski PhD Expert Witness - Francis Hriadil MS

= [ Exhibit A ] =

E-32	---not used---		
E-33	US Surgeon Generals NATIONAL PREVENTION STRATEGY	2011.6	PARE 803(8) - Public Record FRE 803(8) - Public Record Expert Witness - Dr David Carpenter MD Expert Witness - Andrew Michrowski PhD Expert Witness - Francis Hriadil MS
E-34	NATIONAL ENVIRONMENTAL POLICY ACT - NEPA Citizens Guide 2007_12	2007.12	PARE 803(8) - Public Record FRE 803(8) - Public Record Expert Witness - Dr David Carpenter MD Expert Witness - Andrew Michrowski PhD Expert Witness - Francis Hriadil MS
E-35	Naval Medical Research Institute NMRI Research Report F12_524_015-0004B 1972_04_20	1972.04.20	PARE 803(16) - Ancient Doc (30+ yrs) FRE 803(16) - Ancient Doc (20+ yrs) Expert Witness - Dr David Carpenter MD Expert Witness - Andrew Michrowski PhD Expert Witness - Francis Hriadil MS
E-36	Naval Medical Research Institute NMRI A Sampling of Biological Effects From Low-Level Microwave Radiation. 1972_04_20	1972.04.20	PARE 803(8) - Public Record FRE 803(8) - Public Record PARE 803(16) - Ancient Doc (30+ yrs) FRE 803(16) - Ancient Doc (20+ yrs) Expert Witness - Dr David Carpenter MD Expert Witness - Andrew Michrowski PhD Expert Witness - Francis Hriadil MS
E-37	EPA - FCC Exposure Standards are Seriously Flawed 1238900001 1993_11_09	1993.11.09	PARE 803(8) - Public Record FRE 803(8) - Public Record FRE 803(16) - Ancient Doc (20+ yrs) Expert Witness - Dr David Carpenter MD Expert Witness - Andrew Michrowski PhD Expert Witness - Francis Hriadil MS
E-38	DHHS-FDA to FCC-CDRH - FCC Rules Do Not Address the Issue of Long-Term Chronic Exposure to RF Fields 1239420001 1993_11_10	1993.11.10	PARE 803(8) - Public Record FRE 803(8) - Public Record FRE 803(16) - Ancient Doc (20+ yrs) Expert Witness - Dr David Carpenter MD Expert Witness - Andrew Michrowski PhD Expert Witness - Francis Hriadil MS
E-39	NIOSH - FCC Guide is Based Only on One Mechanism - Body Heating 1261030001	1994.01.11	PARE 803(8) - Public Record FRE 803(8) - Public Record FRE 803(16) - Ancient Doc (20+ yrs) Expert Witness - Dr David Carpenter MD Expert Witness - Andrew Michrowski PhD Expert Witness - Francis Hriadil MS
E-40	ARRL Bioeffects Com - FCCs Standard Does Not Protect Against Non-Thermal Effects 1258120001	1994.01.07	FRE 803(16) - Ancient Doc (20+ yrs) Expert Witness - Dr David Carpenter MD Expert Witness - Andrew Michrowski PhD Expert Witness - Francis Hriadil MS
E-41	EPA - Norbert Hankin to Newton re-FCC-2003 - No Consideration of Long-Term Nonthermal Exposure 2002_07_16	2002.07.16	PARE 803(8) - Public Record FRE 803(8) - Public Record Admitted in PA PUC Docket No. C-2017-2620710 Expert Witness - Dr David Carpenter MD Expert Witness - Andrew Michrowski PhD Expert Witness - Francis Hriadil MS
E-42	US Dept of Interior DOI -To NTIA on Non-Ionizing Electromagnetic Radiation Emissions 2014_02_07	2014.02.07	PARE 803(8) - Public Record FRE 803(8) - Public Record Expert Witness - Dr David Carpenter MD Expert Witness - Andrew Michrowski PhD Expert Witness - Francis Hriadil MS
E-43	National Academy of Sciences NAS - Adverse Health Effects of Wireless Communication Devices	2008	PARE 803(8) - Public Record FRE 803(8) - Public Record Expert Witness - Dr David Carpenter MD Expert Witness - Andrew Michrowski PhD Expert Witness - Francis Hriadil MS
E-44	---not used---		
E-45	De-Kun Li MD, PHD, MPH Affidavit to ME PUC Docket No. 2011-00262 with CV 2012_12_03	2012.12.03	Expert Testimony and Affidavit of De-Kun Li MD, PhD, MPH to MPUC Docket No. 2011-00262

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			PARE 803(8) - Public Record FRE 803(8) - Public Record Expert Witness - Dr David Carpenter MD Expert Witness - Andrew Michrowski PhD Expert Witness - Francis Hriadil MS
E-46	Smart Meters - Not So Smart - Investigative Report	2015.01.19	Investigative Report Expert Witness - Dr David Carpenter MD Expert Witness - Andrew Michrowski PhD Expert Witness - Francis Hriadil MS
E-47	Itron Centron SK9AMI7 OpenWay Meter - Itron White Paper - Wireless Transmissions in a 24 Hour Duty Cycle	2011	ITRON SK9AMI7 OpenWay Meter Doc Expert Witness - Francis Hriadil MS Expert Witness - Andrew Michrowski PhD Expert Witness - Dr David Carpenter MD
E-48	---not used---		
E-49	Centron SK9AMI7 - DOC_32248_C4-4_BCSEA-IR-No-1 FortisBC Advanced Metering Infrastructure CPCN Exhibit C4-4 2012_10_26	2012.10.26	ITRON SK9AMI7 OpenWay Meter Doc Expert Witness - Francis Hriadil MS Expert Witness - Andrew Michrowski PhD Expert Witness - Dr David Carpenter MD
E-50	Phillips v County of Allegheny 515 F - 3d 224 235 - 3d Cir 2008	2008	Legal Citation PARE 803(8) - Public Record FRE 803(8) - Public Record Expert Witness - Francis Hriadil MS Expert Witness - Andrew Michrowski PhD Expert Witness - Dr David Carpenter MD
E-51	Inre Cincinnati Radiation Litig - 874 F - Supp 79, 810-11 - SD Oh 1995	1995	Legal Citation PARE 803(8) - Public Record FRE 803(8) - Public Record Expert Witness - Francis Hriadil MS Expert Witness - Andrew Michrowski PhD
E-52	OVERALL SUMMARY_1 - 4 min - video - TRANSCRIPT - 2014 - Smart Meter Facts Video	2014	Investigative Report Expert Witness - Dr David Carpenter MD Expert Witness - Andrew Michrowski PhD Expert Witness - Francis Hriadil MS
E-53	HEALTH_1 - 3 min - video - TRANSCRIPT - 2011_04 David Carpenter MD Public Health Physician on Smart Meter Dangers	2011.04	Expert Witness - Dr David Carpenter MD Expert Witness - Andrew Michrowski PhD Expert Witness - Francis Hriadil MS
E-54	HEALTH_2 - 6 min - video - TRANSCRIPT - 2011_04 Smart Meters 100x Radiation Exposure of a Cell Phone Daniel Hirsch	2011.04	Expert Witness - Dr David Carpenter MD Expert Witness - Andrew Michrowski PhD Expert Witness - Francis Hriadil MS
E-55	HEALTH_3 - 30 min - video - TRANSCRIPT - 2011_12 Dirty Electricity and Diseases of Civilization - Dr. Sam Milham	2011.12	Expert Interview Expert Witness - Dr David Carpenter MD Expert Witness - Andrew Michrowski PhD Expert Witness - Francis Hriadil MS
E-56	HEALTH_4 - 3 min - video - TRANSCRIPT - 2013_04_25 BUSTED - Smart Meters Emit Constant Microwave Radiation - WUSA9 News	2013.04.25	Investigative Report Expert Witness - Dr David Carpenter MD Expert Witness - Andrew Michrowski PhD Expert Witness - Francis Hriadil MS
E-57	HEALTH_5 - 3 min - video - TRANSCRIPT - 2013 Take Back Your Power - SM Radiation Density	2013	Investigative Report Expert Witness - Dr David Carpenter MD Expert Witness - Andrew Michrowski PhD Expert Witness - Francis Hriadil MS
E-58	HEALTH_6 - 84 min - video - TRANSCRIPT - 2014_12_19 Health Effects of Electromagnetic Fields with David Carpenter, MD	2014.12.19	University Webinar Lecture Expert Witness - Dr David Carpenter MD Expert Witness - Andrew Michrowski PhD Expert Witness - Francis Hriadil MS
E-59	HEALTH_7 - 3 min - video - TRANSCRIPT - 2015 International Scientist Appeal on Electromagnetic Fields, Martin Blank, PhD Spokesperson	2015	Expert Witness - Dr David Carpenter MD Expert Witness - Andrew Michrowski PhD Expert Witness - Francis Hriadil MS
E-60	HEALTH_8 - 2 min - video - TRANSCRIPT - Wireless Wake Up Call - Jeremy Johnson MS	2016.02	Expert Lecture Expert Witness - Dr David Carpenter MD Expert Witness - Andrew Michrowski PhD Expert Witness - Francis Hriadil MS
E-61	HEALTH_9 - 16 min - video - TRANSCRIPT - 2016_10 Nerve Disrupting Frequencies from 'Smart' Meters - Warren Woodward Report AZ	2016.10	Smart Meter Test and Analysis Expert Witness - Dr David Carpenter MD Expert Witness - Andrew Michrowski PhD

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			Expert Witness - Francis Hriadil MS
E-62	Pulse Modulated 900 MHz Radiation induces Hypothyroidism and Apoptosis 2010_12	2010.12	Expert Witness - Dr David Carpenter MD Expert Witness - Andrew Michrowski PhD Expert Witness - Francis Hriadil MS FRE 803(18) - Learned Treatise PARE 803(18) - Learned Treatise
E-63	Martin Pall PHD to CA Legislature - Health Effects from RF Fields and Mechanism 2017_07_17	2017.07.17	Expert Witness - Dr David Carpenter MD Expert Witness - Andrew Michrowski PhD Expert Witness - Francis Hriadil MS Admitted in PA PUC Docket No C-2015-2475726, Dr Paul was an Expert Witness PARE 803(8) - Public Record FRE 803(8) - Public Record
E-64-1	Anthony Miller MD Cancer Expert Declares Cell Phone and Wireless Radiation as Carcinogenic	2017.07.31	Press Release Expert Witness - Dr David Carpenter MD Expert Witness - Andrew Michrowski PhD Expert Witness - Francis Hriadil MS
E-64-2	Anthony Miller MD Wireless and Your Health Presentation 2017_07_31	2017.07.31	Expert Presentation Expert Witness - Dr David Carpenter MD Expert Witness - Andrew Michrowski PhD Expert Witness - Francis Hriadil MS
E-64-3	Anthony Miller MD Scientific Publications on Cell Phone Radiation and Cancer	2017.07.31	Expert Presentation Expert Witness - Dr David Carpenter MD Expert Witness - Andrew Michrowski PhD Expert Witness - Francis Hriadil MS D
E-64-4	Anthony Miller MD CV Curriculum Vitae	2017.07.31	Expert Witness - Dr David Carpenter MD Expert Witness - Andrew Michrowski PhD Expert Witness - Francis Hriadil MS MD
E-65	International Classification of Diseases ICD Nonionizing Radiation Codes	2017.10.1	Medical Recognition Expert Witness - Dr David Carpenter MD Expert Witness - Andrew Michrowski PhD Expert Witness - Francis Hriadil MS MD
E-66-1	Joseph Mercola DO Reduce EMF Exposure	2018.01.08	Investigative Report Expert Witness - Dr David Carpenter MD Expert Witness - Andrew Michrowski PhD Expert Witness - Francis Hriadil MS
E-66-2	Martin Pall PHD Harmful Effects of Electromagnetic Fields on Health A Special Interview 2018_01_08	2018.01.08	Expert Interview Expert Witness - Dr David Carpenter MD Expert Witness - Andrew Michrowski PhD Expert Witness - Francis Hriadil MS Dr Martin Pall Phd was accepted as an expert witness in PA PUC Docket No C-2015-2475726 and his Exhibit Material was accepted into the record.
E-67	Joseph Mercola DO CV Curriculum Vitae	2018.01.08	Expert Witness - Dr David Carpenter MD Expert Witness - Andrew Michrowski PhD Expert Witness - Francis Hriadil MS
E-68	Martin Pall PHD Curriculum Vitae	2018.01.08	Expert Witness - Dr David Carpenter MD Expert Witness - Andrew Michrowski PhD Expert Witness - Francis Hriadil MS MD Dr Martin Pall Phd was accepted as an Expert Witness in PA PUC Docket No C-2015-2475726 and his Exhibit Material was accepted into the record.
E-69	Fiorella Belpoggi PHD, New Large Animal Study Like NTPs Links RF to Schwannoma of the Heart	2018.02.20	Investigative Report Expert Witness - Dr David Carpenter MD Expert Witness - Andrew Michrowski PhD Expert Witness - Francis Hriadil MS
E-70	Fiorella Belpoggi PHD et al, Ramazzini Report of Fnal Results Regarding Brain and Heart Tumors - Envir Res 2018_03_07	2018.03.07	Expert Witness - Dr David Carpenter MD Expert Witness - Andrew Michrowski PhD Expert Witness - Francis Hriadil MS FRE 803(18) - Learned Treatise PARE 803(18) - Learned Treatise
E-71-1	Lennart Hardell MD PHD Comments on NTP study to US Dept of Health and Human Services	2018.03.12	PARE 803(8) - Public Record FRE 803(8) - Public Record Expert Witness - Dr David Carpenter MD

**= [ Exhibit A ] =**

			Expert Witness - Andrew Michrowski PhD Expert Witness - Francis Hriadil MS
E-71-2	Lennart Hardell MD PHD Curriculum Vitae		PARE 803(8) - Public Record FRE 803(8) - Public Record Expert Witness - Dr David Carpenter MD Expert Witness - Andrew Michrowski PhD Expert Witness - Francis Hriadil MS
E-72-1	Actions from Peer Review of the Draft NTP Technical Reports on Cell Phone Radiofrequency Radiation 2018_03_26	2018.03.26	PARE 803(8) - Public Record FRE 803(8) - Public Record PARE 803(8) - Public Record FRE 803(8) - Public Record Expert Witness - Dr David Carpenter MD Expert Witness - Andrew Michrowski PhD Expert Witness - Francis Hriadil MS Admitted in PA PUC Docket No. C-2015-2475726
E-72-2	Peer Review Panel for NTP Technical Reports on Cell Phone Radiofrequency Radiation 2018_03_26	2018.03.26	Peer Reviewed PARE 803(8) - Public Record FRE 803(8) - Public Record PARE 803(8) - Public Record FRE 803(8) - Public Record Expert Witness - Dr David Carpenter MD Expert Witness - Andrew Michrowski PhD Expert Witness - Francis Hriadil MS
E-73	---not used---		
E-74	Ronald Kostoff PHD Radiofrequency Radiation (RFR) as a Promoter Enabler of Adverse Health Effects 2018_04	2018.04	Expert Report Expert Witness - Dr David Carpenter MD Expert Witness - Andrew Michrowski PhD Expert Witness - Francis Hriadil MS
E-75	Radio Frequency Radiation-related Cancer - Causation in Occupational or Military Setting - Environ Res 2018_05	2018.05	Expert Witness - Dr David Carpenter MD Expert Witness - Andrew Michrowski PhD Expert Witness - Francis Hriadil MS FRE 803(18) - Learned Treatise PARE 803(18) - Learned Treatise
E-76	Wireless Radiation Electromagnetic Fields Increases Toxic Body Burden - Investigative Report	2018	Investigative Report Expert Witness - Dr David Carpenter MD Expert Witness - Andrew Michrowski PhD Expert Witness - Francis Hriadil MS
E-77	Outdated FCC Safety Standards - Investigative Report 2018	2018	Expert Witness - Dr David Carpenter MD Expert Witness - Andrew Michrowski PhD Expert Witness - Francis Hriadil MS
E-78	Comparing-NTP-and-RI-Studies-of-Sprague-Dawley-Rats-Exposure-to-Radiofrequency-Radiation-RFR-1 w link	2018	Expert Witness - Dr David Carpenter MD Expert Witness - Andrew Michrowski PhD Expert Witness - Francis Hriadil MS
E-79	Goldberg Sharon MD - Main Points and References from October 4th Michigan Legislature Testimony	2018.10	PARE 803(8) - Public Record FRE 803(8) - Public Record Expert Witness - Dr David Carpenter MD Expert Witness - Andrew Michrowski PhD Expert Witness - Francis Hriadil MS
E-80	HEALTH_10 - 12 min - video - TRANSCRIPT - Goldberg Sharon MD - Testimony before the Michigan Legislature on Wireless Radiation	2018.10.04	PARE 803(8) - Public Record FRE 803(8) - Public Record Expert Witness - Dr David Carpenter MD Expert Witness - Andrew Michrowski PhD Expert Witness - Francis Hriadil MS
E-81	Goldberg Sharon MD - Curriculum Vitae	2018.10	Expert Witness - Dr David Carpenter MD Expert Witness - Andrew Michrowski PhD Expert Witness - Francis Hriadil MS MD
E-82			
E-83	---not used---		
E-84	Lamech Federica MBBS - Symptom Development From Exposure to Radiofrequency Fields of Wireless Smart Meters - PubMed Listing	2014.11/12	Peer-reviewed Expert Witness - Dr David Carpenter MD Expert Witness - Andrew Michrowski PhD Expert Witness - Francis Hriadil MS FRE 803(18) - Learned Treatise PARE 803(18) - Learned Treatise Admitted in PA PUC Docket No C-2015-

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E-85	Lamech Federica MBBS - Symptom Development From Exposure to Radiofrequency Fields of Wireless Smart Meters in Victoria Australia	2014.11/12	Peer Reviewed Expert Witness - Dr David Carpenter MD Expert Witness - Andrew Michrowski PhD Expert Witness - Francis Hriadil MS FRE 803(18) - Learned Treatise PARE 803(18) - Learned Treatise Admitted in PA PUC Docket No C-2015-2475726
E-86	---not used---		
E-87	---not used---		
E-88	---not used---		
E-89	---not used---		
E-90	---not used---		
E-91	---not used---		
E-92	NIH - High exposure to radio frequency radiation associated with cancer in male rats 2018_11_01	2018.11.1	PARE 803(8) - Public Record FRE 803(8) - Public Record Expert Witness - Dr David Carpenter MD Expert Witness - Andrew Michrowski PhD Expert Witness - Francis Hriadil MS
E-93	Sage Burgio - Electromagnetic Fields Pulsed Radiofrequency Radiation and Epigenetics How Wireless Technologies - Childhood Development Sage_Burgio_2017	2017	Expert Witness - Dr David Carpenter MD Expert Witness - Andrew Michrowski PhD Expert Witness - Francis Hriadil MS FRE 803(18) - Learned Treatise PARE 803(18) - Learned Treatise
E-94	Peer Reviewed Scientific Research On Wireless Health Effects	2019	Peer Reviewed Research Expert Witness - Dr David Carpenter MD Expert Witness - Andrew Michrowski PhD Expert Witness - Francis Hriadil MS
E-95	WIFI Radiation – What's It Doing to Our Bodies	2018.04.27	Investigative Report Expert Witness - Dr David Carpenter MD Expert Witness - Andrew Michrowski PhD Expert Witness - Francis Hriadil MS
F-1-1	William Bathgate EE ME - Evaluation of the ITRON OpenWay AMI Meter v6 2017_02_16	2017.02.16	ITRON OpenWay Meter Analysis W Bathgate was accepted as an Expert Witness in PA PUC Docket No C-2017-2621057 and his Exhibit Material was accepted into the record PARE Expert Witness - Francis Hriadil MS Expert Witness - Andrew Michrowski PhD
F-1-2	Bathgate William S EE ME - Expert Testimony before the MI Public Service Commission 2017_08_15 U-18322-0281	2017.08.15	PARE 803(8) - Public Record FRE 803(8) - Public Record Expert Witness - Francis Hriadil MS Expert Witness - Andrew Michrowski PhD
F-1-3	Bathgate William S EE ME Curriculum Vitae	2017.08.15	Expert Witness - Andrew Michrowski PhD Expert Witness - Francis Hriadil MS
F-2	Underwriters Laboratories UL The Standard in Safety	2019	Expert Witness - Andrew Michrowski PhD Expert Witness - Francis Hriadil MS Expert Witness - Dr David Carpenter MD
F-3	Sage Associates Wireless Smart Meters and the Potential for Electrical Fires 2010_07	2010.07	Investigative Report Expert Witness - Andrew Michrowski PhD Expert Witness - Francis Hriadil MS
F-4	TESCO Analog Meters Withstand Hot Sockets Better Than Smart Meters 2014_10_16	2014.10.16	Industry Presentation Expert Witness - Andrew Michrowski PhD Expert Witness - Francis Hriadil MS PARE PARE 803(6) - Records of a Regularly Conducted Activity PARE 803(17) - Market Reports and Similar Commercial Publications
F-5	Stockton Smart Meters Explode After Truck Causes Power Surge - Investigative Report 2015_03_30	2015.03.30	Investigative Report Expert Witness - Andrew Michrowski PhD Expert Witness - Francis Hriadil MS PARE 803(6) - Records of a Regularly Conducted Activity

**= [ Exhibit A ] =**

			PARE 803(17) - Market Reports and Similar Commercial Publications PARE 902(6) - Self-Authenticating Evidence
F-6	Exploding Smart Meter Heats Up Queens Park - Investigative Report 2015_06_04	2015.06.04	Investigative Report Expert Witness - Andrew Michrowski PhD Expert Witness - Francis Hriadil MS PARE 803(6) - Records of a Regularly Conducted Activity PARE 803(17) - Market Reports and Similar Commercial Publications PARE 902(6) - Self-Authenticating Evidence
F-7	Edward Halteman PHD Wireless Smart Meter Safety Impact Survey Final Results Summary	2011.09.13	Expert Witness - Andrew Michrowski PhD Expert Witness - Francis Hriadil MS PARE 803(6) - Records of a Regularly Conducted Activity PARE 803(17) - Market Reports and Similar Commercial Publications
F-8	Smart Meter Fire Situation Continues to Escalate - Investigative Report 2016_08_30	2016.08.30	Investigative Report Expert Witness - Andrew Michrowski PhD Expert Witness - Francis Hriadil MS PARE 803(6) - Records of a Regularly Conducted Activity PARE 803(17) - Market Reports and Similar Commercial Publications PARE 902(6) - Self-Authenticating Evidence
F-9	Brookville Borough Jefferson County Power Outage Causes Thousands of Dollars in Damages - FirstEnergy SK9AMI7 - Investigative Report	2017.01.23	Investigative Report Expert Witness - Andrew Michrowski PhD Expert Witness - Francis Hriadil MS PARE 803(6) - Records of a Regularly Conducted Activity PARE 803(17) - Market Reports and Similar Commercial Publications PARE 902(6) - Self-Authenticating Evidence
F-10	Testimony to GAO Cybersecurity - Challenges in Securing the Modernized Electricity Grid	2012.02.28	PARE 803(8) - Public Record FRE 803(8) - Public Record Expert Witness - Andrew Michrowski PhD Expert Witness - Francis Hriadil MS Expert Witness - Dr David Carpenter MD
F-11	FBI - Smart Meter Hacks Likely to Spread - Krebs on Security Report 2012_04	2012.04	PARE 803(8) - Public Record FRE 803(8) - Public Record Expert Witness - Andrew Michrowski PhD Expert Witness - Francis Hriadil MS Expert Witness - Dr David Carpenter MD
F-12	10 Biggest Data Breaches of 2016 (So Far) - CRN Industry Report 2016_07_28	2016.07.28	Investigative Report Expert Witness - Andrew Michrowski PhD Expert Witness - Francis Hriadil MS PARE 803(6) - Records of a Regularly Conducted Activity PARE 803(17) - Market Reports and Similar Commercial Publications PARE 902(6) - Self-Authenticating Evidence
F-13	Here Are All the Ways the Equifax Data Breach is Worse Than You Can Imagine - Investigative Report	2017.09.08	Investigative Report Expert Witness - Andrew Michrowski PhD Expert Witness - Francis Hriadil MS PARE 803(6) - Records of a Regularly Conducted Activity PARE 803(17) - Market Reports and Similar Commercial Publications PARE 902(6) - Self-Authenticating Evidence
F-14	KRACK Spells Big Trouble for Wireless Security - Investigative Report 2017_10_16	2017.10.16	Investigative Report Expert Witness - Andrew Michrowski PhD Expert Witness - Francis Hriadil MS PARE 803(6) - Records of a Regularly Conducted Activity PARE 803(17) - Market Reports and Similar Commercial Publications

**= [ Exhibit A ] =**

			PARE 902(6) - Self-Authenticating Evidence
F-15	ONZO Global Data Firm - We Help Utilities Surveil and Profile Their Customers and Monetize Home Surveillance Data Investigative Report	2017.03.25	Investigative Report Expert Witness - Andrew Michrowski PhD Expert Witness - Francis Hriadil MS
F-16	ONZO Announces Major Enhancements to Customer Insights Data Analytics Solution - Industry Report 2016_02_09	2016.02.09	Investigative Report Expert Witness - Andrew Michrowski PhD Expert Witness - Francis Hriadil MS PARE 803(6) - Records of a Regularly Conducted Activity PARE 803(17) - Market Reports and Similar Commercial Publications PARE 902(6) - Self-Authenticating Evidence
F-17	---not used---		
F-18	REMOVALs - Inside PECO's Smart Meter Debacle - Investigative Report 2012_10_15	2012.10.15	Investigative Report Expert Witness - Andrew Michrowski PhD Expert Witness - Francis Hriadil MS
F-19	REMOVALs - PGE Replacing 70000 Electricity Meters Because of Fire Risk – Investigative Report	2014.07.24	Investigative Report Expert Witness - Andrew Michrowski PhD Expert Witness - Francis Hriadil MS PARE 803(6) - Records of a Regularly Conducted Activity PARE 803(17) - Market Reports and Similar Commercial Publications PARE 902(6) - Self-Authenticating Evidence
F-20	REMOVALs - SaskPower to Remove 105000 Smart Meters Following Fires – Investigative Report	2014.07.31	Investigative Report Expert Witness - Andrew Michrowski PhD Expert Witness - Francis Hriadil MS PARE 803(6) - Records of a Regularly Conducted Activity PARE 803(17) - Market Reports and Similar Commercial Publications PARE 902(6) - Self-Authenticating Evidence
F-21	REMOVALs - Reno Smart Meter Fires More Widespread Than First Feared – Investigative Report 2014_07_21	2014.07.21	Investigative Report Expert Witness - Andrew Michrowski PhD Expert Witness - Francis Hriadil MS PARE 803(6) - Records of a Regularly Conducted Activity PARE 803(17) - Market Reports and Similar Commercial Publications PARE 902(6) - Self-Authenticating Evidence
F-22	REMOVALs - Overheating Concerns - Lakeland Electric to Replace 10657 Residential Smart Meters - Investigative Report 2014_08_26	2014.08.26	Investigative Report Expert Witness - Andrew Michrowski PhD Expert Witness - Francis Hriadil MS PARE 803(6) - Records of a Regularly Conducted Activity PARE 803(17) - Market Reports and Similar Commercial Publications PARE 902(6) - Self-Authenticating Evidence
F-23	REMOVALs - Reno Sparks Fire Chiefs Call for Smart Meter Probe - Investigative Report	2014.09.16	Investigative Report Expert Witness - Andrew Michrowski PhD Expert Witness - Francis Hriadil MS PARE 803(6) - Records of a Regularly Conducted Activity PARE 803(17) - Market Reports and Similar Commercial Publications PARE 902(6) - Self-Authenticating Evidence
F-24	REMOVALs - This Womans Death May Confirm All Your Suspicions About Smart Meters - Investigative Report 2014	2014	Investigative Report Expert Witness - Andrew Michrowski PhD Expert Witness - Francis Hriadil MS Expert Witness - Dr David Carpenter MD
F-25	REMOVALs - Fear of Fire Hazard Causes Removal of Thousands of Smart Meters - Investigative Report	2015.01.23	Investigative Report Expert Witness - Andrew Michrowski PhD Expert Witness - Francis Hriadil MS Expert Witness - Dr David Carpenter MD PARE 803(6) - Records of a Regularly Conducted Activity

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			PARE 803(17) - Market Reports and Similar Commercial Publications PARE 902(6) - Self-Authenticating Evidence
F-26	REMOVALs - Stockton Smart Meters Explode After Truck Causes Power Surge - Investigative Report	2015.03.30	Investigative Report Expert Witness - Andrew Michrowski PhD Expert Witness - Francis Hriadil MS Expert Witness - Dr David Carpenter MD PARE 803(6) - Records of a Regularly Conducted Activity PARE 803(17) - Market Reports and Similar Commercial Publications PARE 902(6) - Self-Authenticating Evidence
F-27	Smart Meters Pose Ongoing Issues For Duquesne Light Customers - Investigative Report 2016_05_17	2016.05.17	Investigative Report Expert Witness - Andrew Michrowski PhD Expert Witness - Francis Hriadil MS PARE 803(6) - Records of a Regularly Conducted Activity PARE 803(17) - Market Reports and Similar Commercial Publications PARE 902(6) - Self-Authenticating Evidence
F-28	REMOVALs - Astonishing - Hydro One Pulling Plug on 36000 Rural Smart Meters After Years of Complaints - Investigative Report 2016_01_13	2016.01.13	Investigative Report Expert Witness - Andrew Michrowski PhD Expert Witness - Francis Hriadil MS PARE 803(6) - Records of a Regularly Conducted Activity PARE 803(17) - Market Reports and Similar Commercial Publications PARE 902(6) - Self-Authenticating Evidence
F-29	---not used---		
F-30	REMOVALs - Ontario Pulls Plug on 36000 Rural Smart Meters - Investigative Report 2016_01_20	2016.01.20	Investigative Report Expert Witness - Andrew Michrowski PhD Expert Witness - Francis Hriadil MS
F-31	REMOVALs - Big Rig Crash into Pole Leads to Power Surge in Discovery Bay -- Investigative Report 2017_10_26	2017.10.26	Investigative Report Expert Witness - Andrew Michrowski PhD Expert Witness - Francis Hriadil MS PARE 803(6) - Records of a Regularly Conducted Activity PARE 803(17) - Market Reports and Similar Commercial Publications PARE 902(6) - Self-Authenticating Evidence
F-32	Smart Meter Security Fears - Smart Meters will be Hacked - Security Report 2010_08	2010.08	Investigative Report Expert Witness - Andrew Michrowski PhD Expert Witness - Francis Hriadil MS PARE 803(6) - Records of a Regularly Conducted Activity PARE 803(17) - Market Reports and Similar Commercial Publications PARE 902(6) - Self-Authenticating Evidence
F-33	Smart Grid Cyber Security AGCS Industry Security Review 2013_11_04	2013.11.04	Industry Presentation Expert Witness - Andrew Michrowski PhD Expert Witness - Francis Hriadil MS
F-34	Smart Grid Powers Up Privacy Worries - Politico Investigative Report 2015_01_01	2015.01.01	Investigative Report Expert Witness - Andrew Michrowski PhD Expert Witness - Francis Hriadil MS PARE 803(6) - Records of a Regularly Conducted Activity PARE 803(17) - Market Reports and Similar Commercial Publications PARE 902(6) - Self-Authenticating Evidence
F-35	Why the Latest Yahoo Hack Is So Much Worse Than You Think - Investigative Report 2016_12_15	2016.12.15	Investigative Report Expert Witness - Andrew Michrowski PhD Expert Witness - Francis Hriadil MS PARE 803(6) - Records of a Regularly Conducted Activity PARE 803(17) - Market Reports and Similar Commercial Publications

**= [ Exhibit A ] =**

			PARE 902(6) - Self-Authenticating Evidence
F-36	Worlds Leading Hackers Explain Why You Don't Want Tech Companies Controlling Everything in Your Home - Investigative Report 2017_08_05	2017.08.05	Investigative Report Expert Witness - Andrew Michrowski PhD Expert Witness - Francis Hriadil MS PARE 803(6) - Records of a Regularly Conducted Activity PARE 803(17) - Market Reports and Similar Commercial Publications PARE 902(6) - Self-Authenticating Evidence
F-37	Hackers Can Now Cause Blackouts on Americas Electrical Grid - Investigative Report 2017_09_09	2017.09.09	Investigative Report Expert Witness - Andrew Michrowski PhD Expert Witness - Francis Hriadil MS PARE 803(6) - Records of a Regularly Conducted Activity PARE 803(17) - Market Reports and Similar Commercial Publications PARE 902(6) - Self-Authenticating Evidence
F-38	Security Finally Got the Awareness It Needed in 2017 - Investigative Report 2017_12_02	2017.12.02	Investigative Report Expert Witness - Andrew Michrowski PhD Expert Witness - Francis Hriadil MS PARE 803(6) - Records of a Regularly Conducted Activity PARE 803(17) - Market Reports and Similar Commercial Publications PARE 902(6) - Self-Authenticating Evidence
F-39	PRIVACY_1 - SECURITY - CITIZEN's RIGHTS - 5 min - video – TRANSCRIPT - 2011_08 Smart Meters - Jerry Day Report and Commentary	2011.08	Investigative Report Expert Witness - Andrew Michrowski PhD Expert Witness - Francis Hriadil MS PARE 803(6) - Records of a Regularly Conducted Activity PARE 803(17) - Market Reports and Similar Commercial Publications PARE 902(6) - Self-Authenticating Evidence
F-40	PRIVACY_2 - 11 min - video - TRANSCRIPT - 2017_03 Utility Meters use In Mass Surveillance - Jerry Day Report and Commentary	2017.03	Investigative Report Expert Witness - Andrew Michrowski PhD Expert Witness - Francis Hriadil MS PARE 803(6) - Records of a Regularly Conducted Activity PARE 803(17) - Market Reports and Similar Commercial Publications PARE 902(6) - Self-Authenticating Evidence
F-41	PRIVACY_3 - 2 min - video - TRANSCRIPT - 2017_09 ONZO Smart Meters Admission of IN-HOME SURVEILLANCE FOR PROFIT	2017.09	Industry Presentation Expert Witness - Andrew Michrowski PhD Expert Witness - Francis Hriadil MS
F-42	PRIVACY_4 - 30 min - video - TRANSCRIPT - ONZO EPRI EU NILM 2016 – Marcel Horstmann	2016	Industry Presentation Expert Witness - Andrew Michrowski PhD Expert Witness - Francis Hriadil MS
F-43	PRIVACY_5 - CITIZEN's RIGHTS - RELIABILITY - HIGH COST - 6 min - video TRANSCRIPT - 2017_03_07 MI Michele Reisen Michigan	2017.03.07	PARE 803(8) - Public Record FRE 803(8) - Public Record Expert Witness - Andrew Michrowski PhD Expert Witness - Francis Hriadil MS
F-44	RELIABILITY_1 - 2 min - video - TRANSCRIPT - 2015_10 FirstEnergy Testimony before Subcommittee Hearing - Smart Meter Service Life	2015.10	PARE 803(8) - Public Record FRE 803(8) - Public Record Expert Witness - Andrew Michrowski PhD Expert Witness - Francis Hriadil MS
F-45	RELIABILITY_2 - 2 min - video - TRANSCRIPT - 2016_05_17 CBS KDKA News Report - Smart Meters Pose Ongoing Issues For Duquesne Light	2016.05.17	Investigative Report Expert Witness - Andrew Michrowski PhD Expert Witness - Francis Hriadil MS PARE 803(6) - Records of a Regularly Conducted Activity PARE 803(17) - Market Reports and Similar Commercial Publications PARE 902(6) - Self-Authenticating Evidence
F-46	SAFETY_1 - FIRES - 32 min - video - TRANSCRIPT - 2016_03 Smart Meter Fires - Brian Thiesen Report and Commentary	2016.03	Investigative Report - ITRON Smart Meters Expert Witness - Andrew Michrowski PhD Expert Witness - Francis Hriadil MS

**= [ Exhibit A ] =**

F-47	SECURITY_1 - 1 min - video - TRANSCRIPT - 2011_10 - CIA Director Calls Smart Grid Stupid due to Security problems	2011.10	Investigative Report Expert Witness - Andrew Michrowski PhD Expert Witness - Francis Hriadil MS PARE 803(6) - Records of a Regularly Conducted Activity PARE 803(17) - Market Reports and Similar Commercial Publications PARE 902(6) - Self-Authenticating Evidence
F-48	SECURITY_2 - SAFETY - RISK - 9 min - video - TRANSCRIPT - 2017_03_07 MI Sen Patrick Colbeck Testimony	2017.03.07	PARE 803(8) - Public Record FRE 803(8) - Public Record Expert Witness - Andrew Michrowski PhD Expert Witness - Francis Hriadil MS
F-49	How Big Wireless Made Us Think That Cell Phones Are Safe - A Special Investigation 2018_04_23	2018.04.23	Investigative Report Expert Witness - Andrew Michrowski PhD Expert Witness - Francis Hriadil MS PARE 803(6) - Records of a Regularly Conducted Activity PARE 803(17) - Market Reports and Similar Commercial Publications PARE 902(6) - Self-Authenticating Evidence
F-50	MSPs Guide to 3 Game-Changing Problems in Security Redmond Channel Partner - KRACK WHACKS WPA2 2017_11	2017.11	Investigative Report Expert Witness - Andrew Michrowski PhD Expert Witness - Francis Hriadil MS PARE 803(6) - Records of a Regularly Conducted Activity PARE 803(17) - Market Reports and Similar Commercial Publications PARE 902(6) - Self-Authenticating Evidence
F-51	Apples Tim Cook Calls for Regulation on Data - Says Facebook Incident is Dire 2018_03_25	2018.03.25	Investigative Report Expert Witness - Andrew Michrowski PhD Expert Witness - Francis Hriadil MS PARE 803(6) - Records of a Regularly Conducted Activity PARE 803(17) - Market Reports and Similar Commercial Publications PARE 902(6) - Self-Authenticating Evidence
F-52	Facebooks Data Scandal Should be a Wake-up Call About Our Online Footprint - Investigative Report	2018.03.27	Investigative Report Expert Witness - Andrew Michrowski PhD Expert Witness - Francis Hriadil MS PARE 803(6) - Records of a Regularly Conducted Activity PARE 803(17) - Market Reports and Similar Commercial Publications PARE 902(6) - Self-Authenticating Evidence
F-53	Amid Health Privacy Fears States Are Letting People Reject Smart Meters 2016_02_10	2016.02.10	Investigative Report Expert Witness - Andrew Michrowski PhD Expert Witness - Francis Hriadil MS Expert Witness - Dr David Carpenter MD PARE 803(6) - Records of a Regularly Conducted Activity PARE 803(17) - Market Reports and Similar Commercial Publications PARE 902(6) - Self-Authenticating Evidence
F-54-1	Barris Liz - Legal-Constitutional-and-Human-Rights-Violations-of-Smart-Grid-and-Smart-Meters1	2013.10	Congressional White Paper Expert Witness - Andrew Michrowski PhD Expert Witness - Francis Hriadil MS Expert Witness - Dr David Carpenter MD
F-54-2	Barris Liz - EMF Bio	2018	Expert Witness - Andrew Michrowski PhD Expert Witness - Francis Hriadil MS Expert Witness - Dr David Carpenter MD
F-55	---not used---		
F-56	---not used---		
F-57	---not used---		
F-58	California Warns About Cellphone Exposure And Health Risks - Investigative Report 2017_12_17	2017.12.17	PARE 803(8) - Public Record FRE 803(8) - Public Record

= [ Exhibit A ] =

			Expert Witness - Dr David Carpenter MD Expert Witness - Andrew Michrowski PhD Expert Witness - Francis Hriadil MS Admitted in PA PUC Docket No. C-2017-2620710
F-59	Colbeck Patrick - Michigan State Senator - Wireless-Radiation-Brief Colbeck 2018-09-20	2018.09.20	Government Testimony PARE 803(8) - Public Record FRE 803(8) - Public Record Expert Witness - Dr David Carpenter MD Expert Witness - Andrew Michrowski PhD Expert Witness - Francis Hriadil MS
F-60	Conrad Richard H PHD - Nine reasons why smart meter-systems are a mistake 2014_05_08	2014.05.08	Investigative Report Expert Witness - Dr David Carpenter MD Expert Witness - Andrew Michrowski PhD Expert Witness - Francis Hriadil MS
F-61	Conrad Richard H PHD - Testimony MPUC Docket No. 2011-00262, February 1 2013	2013.2.1	PARE 803(8) - Public Record FRE 803(8) - Public Record Expert Witness - Dr David Carpenter MD Expert Witness - Andrew Michrowski PhD Expert Witness - Francis Hriadil MS
F-62	Conrad Richard H PHD - Curriculum Vitae	2013.2.1	PARE 803(8) - Public Record FRE 803(8) - Public Record Expert Witness - Dr David Carpenter MD Expert Witness - Andrew Michrowski PhD Expert Witness - Francis Hriadil MS
F-63	NM PRC bans Smart Meters		PARE 803(8) - Public Record FRE 803(8) - Public Record Expert Witness - Dr David Carpenter MD Expert Witness - Andrew Michrowski PhD Expert Witness - Francis Hriadil MS
F-64	NM new-mexico-prc-4-11-18-15-00312-ut-final-order	2018.4.11	PARE 803(8) - Public Record FRE 803(8) - Public Record Expert Witness - Andrew Michrowski PhD Expert Witness - Francis Hriadil MS
F-65-1	UL Online Certification Directory POCZ Guide Info - UL 2735	2019	Industry Document - ITRON Meters Expert Witness - Andrew Michrowski PhD Expert Witness - Francis Hriadil MS
F-65-2	New UL 2735 Smart Meter standard - not yet part of the NRTL Program	2019	Industry Document - ITRON Meters Expert Witness - Andrew Michrowski PhD Expert Witness - Francis Hriadil MS
F-66	Playing with Fire - UL 2735 Certification of ITRON Smart Meters 2016_02_25	2016.02.25	Investigative Report Expert Witness - Andrew Michrowski PhD Expert Witness - Francis Hriadil MS
F-67	Oncor Electric Delivery Company, LLC and International Brotherhood of Electrical Workers, Local Union No. 69, affiliated with International Brotherhood of Electrical Workers. Cases 16- CA-103387 and 16-CA-112404 July 29 2016	2016.7.29	Legal Testimony and Citation - ITRON Meters and Fires - National Labor Relations Board PARE 803(8) - Public Record FRE 803(8) - Public Record Expert Witness - Andrew Michrowski PhD Expert Witness - Francis Hriadil MS
F-68	More customers angry with high electric bills contact Channel 11 2018_02_02	2018.02.02	Investigative Report Expert Witness - Andrew Michrowski PhD Expert Witness - Francis Hriadil MS PARE 803(6) - Records of a Regularly Conducted Activity PARE 803(17) - Market Reports and Similar Commercial Publications PARE 902(6) - Self-Authenticating Evidence
F-69	US Government Makes Surprise Move To Secure Power Grid From Cyberattacks 2019_07_03	2019.07.03	Investigative Report Expert Witness - Andrew Michrowski PhD Expert Witness - Francis Hriadil MS PARE 803(6) - Records of a Regularly Conducted Activity PARE 803(17) - Market Reports and Similar Commercial Publications PARE 902(6) - Self-Authenticating Evidence

= [ Exhibit A ] =

			PARE 803(8) - Public Record FRE 803(8) - Public Record
G-1	Getting Smarter About the Smart Grid_Report NIS Law and Policy Final Report 2012_11_26	2012.11.26	Expert Analysis Expert Witness - Andrew Michrowski PhD Expert Witness - Francis Hriadil MS
G-2	Northeast Utilities Executive Summary, MA Depart of Public Utilities, D.P.U. 12-76 2017_01_17	2017.01.17	PARE 803(8) - Public Record FRE 803(8) - Public Record Expert Witness - Andrew Michrowski PhD Expert Witness - Francis Hriadil MS
G-3	PA Public Utility Code 66 PA CS - Omnibus Amendments - ACT.129 2008_10_15	2008.10.15	PARE 803(8) - Public Record FRE 803(8) - Public Record Expert Witness - Francis Hriadil MS
G-4	PA Legislative Journal - House - Session of 2008 192d of the General Assembly No 13 2008_02_11	2008.02.11	PARE 803(8) - Public Record FRE 803(8) - Public Record Expert Witness - Francis Hriadil MS
G-5-1	HOUSE BILL 2200 P_N_ 3218 2008_02_11	2008.02.11	PARE 803(8) - Public Record FRE 803(8) - Public Record Expert Witness - Francis Hriadil MS
G-5-2	HOUSE BILL 2200 P_N_ 3233 2008_02_12	2008.02.12	PARE 803(8) - Public Record FRE 803(8) - Public Record Expert Witness - Francis Hriadil MS
G-5-3	HOUSE BILL 2200 P_N_ 4429 2008_09_23	2008.09.23	PARE 803(8) - Public Record FRE 803(8) - Public Record Expert Witness - Francis Hriadil MS
G-6	PA Legislative Journal - Senate - Session of 2008 192nd of the General Assembly No. 64.2008_10_08	2008.10.08	PARE 803(8) - Public Record FRE 803(8) - Public Record Expert Witness - Francis Hriadil MS
G-7	Trans-Lex org Law Search - Principle No. 1-2-1 - Standard of Reasonableness		Legal Definition Expert Witness - Francis Hriadil MS Expert Witness - Andrew Michrowski PhD Expert Witness - Dr David Carpenter MD.
G-8	US Supreme Court ruling - Martinez v. Lamagno No. 94-167 515 US 417 1995 1995_06_14	1995.06.14	Legal Citation - PARE 803(8) - Public Record FRE 803(8) - Public Record Expert Witness - Francis Hriadil MS
G-9	Accepted Legal Standards - Federal Rules of Civil Procedure - What is the Only Word That Means Mandatory - FAA		PARE 803(8) - Public Record FRE 803(8) - Public Record Expert Witness - Francis Hriadil MS
G-10	PA PUC - Smart Meter Q&A	2019	PA PUC Document PARE 803(8) - Public Record FRE 803(8) - Public Record Expert Witness - Francis Hriadil MS
G-11	Why Smart Meters Might Be a Dumb Idea - Consumers Digest Report 2011	2011	Investigative Report Expert Witness - Andrew Michrowski PhD Expert Witness - Francis Hriadil MS PARE 803(6) - Records of a Regularly Conducted Activity PARE 803(17) - Market Reports and Similar Commercial Publications PARE 902(6) - Self-Authenticating Evidence
G-12	Duquesne Light Final Smart Meter Technology Procurement and Installation Plan P-2012 M-2009-2123948	2012	Duquesne Light Co (DLC) Document P-2012 M-2009-2123948 PARE 803(8) - Public Record FRE 803(8) - Public Record
G-13	Duquesne Light Seeks Rate Increase for 600000 Customers - Report 2018_04_17	2018.04.17	Investigative Report Expert Witness - Andrew Michrowski PhD Expert Witness - Francis Hriadil MS PARE 803(6) - Records of a Regularly Conducted Activity PARE 803(17) - Market Reports and Similar Commercial Publications PARE 902(6) - Self-Authenticating Evidence
G-14	Duquesne Light Company Poor rating 2018_04_29	2018.04.29	Expert Witness - Francis Hriadil MS PARE 803(6) - Records of a Regularly Conducted Activity

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Michele Hriadil and  
Francis Hriadil,

Complainant,

vs.

DUQUESNE LIGHT COMPANY,

Respondent.

No: C-2016-2571726

**CERTIFICATE OF SERVICE**

I hereby certify that I have this day served a true copy of Complainants' Answer to Motion in Limine to Bar Complainants from Introducing or Relying Upon Inadmissible Evidence, upon the participants listed below in accordance with the requirements of 52 PA. Code § 1.54 (relating to service by a participant):

*Via Paper Filing*  
Judge Jeffrey Watson  
PA PUC Pittsburgh Administrative Law Judge Office  
301 Fifth Ave, Suite 220  
Piatt Place  
Pittsburgh, PA 15222

*Via Paper Filing*  
Jeremy V Farrell, Esquire  
Paul S Miller, Esquire  
One PPG Place - 1500  
Pittsburgh, PA 15222  
(412) 594-5619 (Fax)

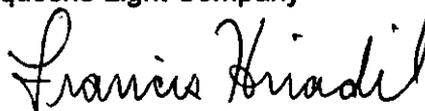
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SECRETARY'S BUREAU

Counsel for Respondent, Duquesne Light Company

Dated this 6<sup>th</sup> day of November, 2019



Michele and Francis Hriadil  
331 Shady Ridge Drive  
Monroeville, Pennsylvania  
(412) 779-3314  
[hriadil@attglobal.net](mailto:hriadil@attglobal.net)

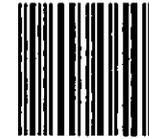
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F. Hriadil  
331 Shady Ridge Drive  
Monroeville, PA 15146

**Rosemary Chiavetta, Secretary**  
**Pennsylvania Public Utility Commission**  
**400 North Street**  
**Keystone Building, 2nd Floor**  
**Harrisburg, Pennsylvania 17120**