

432 E. Wesner Rd
Blandon, PA 19510
November 25, 2019

Rosemary Chiavetta
Secretary
Pennsylvania Public Utility Commission
400 North Street 2ND Floor
Harrisburg, PA 17120

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PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

Heidi Fiedler v. Metropolitan Edison Company
Docket No. C-2018-3003642

Dear Ms. Chiavetta:

Please find enclosed Complainant's Motion to Dismiss Objections of Metropolitan Edison Company to the Interrogatories and Requests for Production of Documents of Heidi Fiedler to Metropolitan Edison Company, Set 1. In addition, please find enclosed Complainant's Status Report dated November 25, 2019.

I am also serving copies to the Honorable Tori Giesler of First Energy Services Company and to the Honorable Jeffrey Watson, Administrative Law Judge, Pennsylvania Public Utilities Commission.

Thank you for your attention to this matter.

Very truly yours,



Heidi Fiedler

Enclosures

cc: The Honorable Jeffrey Watson, Pennsylvania Public Utility Commission
The Honorable Tori Giesler, First Energy Services Company

432 E. Wesner Rd
Blandon, PA 19510
November 25, 2019

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
400 North St.
Harrisburg, PA 17120

Re: Status Report
Heidi Fiedler v. Metropolitan Edison Company
Docket No. C-2018-3003642

Dear Ms. Chiavetta:

In accordance with the Interim Order issued by Administrative Law Judge Jeffrey Watson on October 10, 2019, I have prepared the following Status Report.

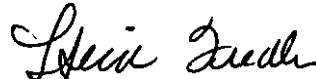
I received Respondent's Objections to the Interrogatories and Requests for Production of Documents of Heidi Fiedler to Metropolitan Edison, Set 1 on November 15, 2019 by mail. My Motion to Dismiss Respondent's Objections are filed with this Status Report.

Despite Respondent's assertions, I have previously filed full and complete responses to Respondent's discovery request.

Since I have not yet received any answers or documents per my discovery requests, it is premature to schedule a hearing.

A copy of this report is being furnished to both ALJ Jeffrey Watson and Tori Giesler, Esq, First Energy Services Company, in accordance with the attached Certificate of Service.

Very truly yours,



Heidi Fiedler

Enclosures

cc: Hon. Jeffrey Watson, PA PUC
Tori Giesler, Esq

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

HEIDI FIEDLER	:	
	:	
V.	:	Docket No. C-2018-3003642
	:	
METROPOLITAN EDISON COMPANY	:	

**MOTION TO DISMISS METROPOLITAN EDISON'S OBJECTIONS TO THE
INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS OF
HEIDI FIEDLER TO METROPOLITAN EDISON COMPANY, SET 1**

Complainant files this Motion to Dismiss Metropolitan Edison's Objections to the Interrogatories and Requests for Production of Documents of Heidi Fiedler to Metropolitan Edison, Set 1, which was received on November 15, 2019 by mail. In support of her Motion, Complainant respectively submits the following:

ANSWER TO RESPONDENT'S OBJECTIONS

1. Admitted.
2. No answer is required.
3. Admitted.
4. Admitted.
5. Admitted.
6. No answer is required.
7. No answer is required.
8. No answer is required.
9. No answer is required.

10. No answer is required.
11. No answer is required.
12. No answer is required.
13. No answer is required.
14. No answer is required.
15. Denied as stated.
16. Denied as stated.
17. Denied as stated.
18. No answer is required.
19. Denied as stated.
20. Denied as stated.
21. No answer is required.
22. No answer is required.
23. No answer is required.
24. No answer is required.
25. No answer is required.
26. No answer is required.
27. No answer is required.
28. No answer is required.
29. Denied as stated. Complainant served a status report on ALJ Watson and Respondent on February 28, 2019.
30. No answer is required.
31. No answer is required.
32. No answer is required.
33. No answer is required.

34. No answer is required.
35. No answer is required.
36. No answer is required.
37. No answer is required.
38. No answer is required.
39. No answer is required.
40. Denied as stated. Complainant filed a status report on May 7, 2019.
41. No answer is required.
42. No answer is required.
43. No answer is required.
44. No answer is required.
45. Denied. Complainant's discovery requests are completely proper and relevant to the Second Amended Complainant. Respondent offers no specific details on the allegations listed. Respondent asked very comprehensive questions in its Interrogatories and Request for Production of Documents, yet is unwilling to comply with Complainant's Interrogatories and Request for Production of Documents. Complainant believes that all requested information is admissible and of a non-confidential nature.
46. No answer is required.
47. Denied. In response to Respondent's Objections to Discovery Request 7, the procedures and training of Respondent's customer safety employees is entirely relevant and specific to the Second Amended Complaint, which details the difficulties in resolving Complainant's customer safety complaint. No personal employee information is requested from Respondent.
In response to Respondent's Objections to Discovery Request 13, either the Respondent is

or is not in compliance with the PUC code and the the National Electric Safety Code. The Respondent has retained experts that are surely able to answer this question. Complainant raised serious electrical safety issues in the Second Amended Complaint and is entitled to discovery on whether Respondent is in compliance with applicable safety codes and regulations.

In response to Respondent's Objections to Discovery Request 15, the Second Amended Complaint details safety issues. Accordingly, it is entirely relevant and reasonable for the Respondent to list the total amount of fines and penalties levied against Respondent for safety and environmental infractions. Respondent is a large public corporation with a legal staff that clearly has access to this information. Again, no confidential information has been requested.

In response to Respondent's Objections to Discovery Request 17, again the Second Amended Complaint details safety issues and requests the Commission to order an engineering safety review and inspection of Respondent's electrical safety equipment. This request is especially relevant given the safety issues raised by Complainant and PA Bureau of Investigation and Enforcement against Respondent in separate Complaints before the Commission. A large public corporation such as Respondent surely has the ability to provide a list of safety complaints related to Respondent's damaged poles and related equipment, which Complainant is entitled to receive under Discovery. Further a list of safety complaints filed against the Respondent is not confidential.

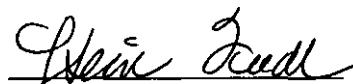
In response to Respondent's Objections to Discovery Request 31, Complainant is entitled under Discovery to request copies of Commission-ordered safety audit reports and other safety reports to the PA Bureau of Investigation and Enforcement's reports and Complaints, concerning the Respondent. It is the responsibility of Respondent to provide copies of audits, reports, and so forth whether or not this information is available on the

Commission's website. Complainant does not seek any confidential information and believes Discovery Request 31 does not require the release of any confidential customer information. Finally, the information sought through this discovery request will show Respondent's history on safety compliance, which is completely relevant since the Second Amended Complaint filed against Respondent details serious safety issues.

CONCLUSION

Based on the foregoing, Complainant respectfully requests that the Commission: (1) dismiss the Company's Objections in their entirety; (2) and issue an Order granting the relief requested and any other remedy that the Commission deems just and appropriate.

Respectively submitted,



Heidi Fiedler
432 E. Wesner Rd
Blandon, PA 19510

Dated: November 25, 2019

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

HEIDI FIEDLER

v.

METROPOLITAN EDISON COMPANY

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:
:
:
:

C-2018-3003642

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true and correct copy of the Motion to Dismiss Objections of Metropolitan Edison Company to Interrogatories and Requests for Production of Documents of Heidi Fiedler to Metropolitan Edison Company and a Status Report dated November 25, 2019 upon the individuals listed below, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

Service by First Class Mail, postage prepaid, as follows:

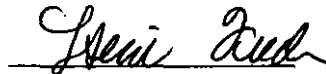
Tori Giesler, Esq

First Energy Services Company
2800 Pottsville Pike
PO Box 16001
Reading, PA 19612

Hon. Jeffrey A. Watson

Administrative Law Judge
Pennsylvania Public Utility Commission
301 5th Avenue, Suite 220
Pittsburgh, PA 15222

Dated: November 25, 2019



Heidi Fiedler
432 E. Wesner Rd
Blandon, PA 19510

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SECRETARY'S BUREAU

432 E. WESNER RD
BLANDON, PA 19510



MS. ROSEMARY CHIAVETTA
SEC, POC
400 NORTH ST.
HARRISBURG, PA 17120

