

MOTION: To request a hearing in writing and affirmative defense -- with incontrovertible mailing evidence

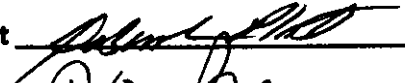
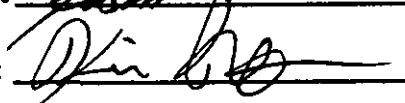
that the Platts did indeed answer and file both the new matter and preliminary objection.

Enclosed are copies of the certified mail receipts, demonstrating that the Platts filed answers to the new matter and preliminary objection.

Mr. Platt requests that the hearing be done entirely in writing, he has hearing loss (which makes it difficult to hear clearly what is said over the phone), and legitimately feels that a telephone hearing will compromise his ability to understand what is being said and respond properly.

This hearing loss is due to recent exposure to extreme loud noise that has further impaired his hearing. (Occupational Hazard) Mr. Platt is working with his primary physician to understand the nature of the damage and what can be done about it.

Therefore, we respectfully request that the hearing be done entirely in writing

Deborah Platt  DATE 1/21/2020
Kim Platt  DATE 1/21/2020

RECEIVED

JAN 22 2020

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

JANUARY 21, 2020

DOCKET NO. C-2019-3013745

Answer to MET ED Preliminary Objection and affirmative response with request for a hearing

**This letter was mailed to the two addresses on the certificate of mailing and certified mail receipt
We have not received the returned signed notice for the certified mail receipt**

In previous mailings we are providing evidence that we did receive the return receipt

How is it possible that this was not received?

NOTICE: This answer and new matter was not received until November 22, 2019

Response to MET ED

Answer and New Matter to the complainant Deborah Engisch-Platt and Kim Platt

- 1) Admitted
- 2) Admitted
- 3) Admitted
- 4) Admitted I am having a reliability, safety or quality problem with my utility service.
There is a plethora of scientific and medical evidence documenting health damage, fire hazards and privacy issues with smart meters.

My husband is 63 years old and has an irregular heartrate, which is compounded by his electromagnetic hypersensitivity. Our daughter also has a sensory disorder affected by high pitched electrical humming sounds and pulsations.

The World Health Organization, physicians for safe technology, the American Pediatric Society, U.S. Medical Journal, and John Opeschek Ph D. of Harvard University have documented 20,000 (Twenty thousand) studies confirming the damages of smart meters and electromagnetic Class 2B Carcinogens, including but not limited to heart damage, endanger to young people per the American Pediatric Society.

Last paragraph of page 2 and 1st paragraph of page 3

Objection. Conversely the company's acting via misinterpretation of Act 129, which was designed as an OPT-IN measure. Furthermore, the company is in violation of PA. Title 66/1501, which states that utility services must be safe and reasonable. Since smart meters have known health hazards the company's actions are neither safe or reasonable. Since smart meters are inherently unsafe.

Second paragraph – Page 3

Denied in part, admitted in part.

There was no attempt to contact Deborah Engisch-Platt on October 9th, 2019.

First sentence – Page 4

Objection. Ungrammatical syntax as the present participle is not applicable.

Objection. It is illegal for a utility company to install a communication device, at a service location without the express permission of the customer. As already stated, ACT 129 has been mis-interpreted by the company and the commission since it was designed as an OPT-IN measure.

18) Denied. The invocation of bad law by the commission and the company does not, in this case, justify the denial of any customer's civil rights.

19) Denied. The deployment of Smart Meters is unconstitutional.

See HAAS vs the PUC. Furthermore, the World Health Organization, American Pediatric Society, US Medical Journal, Physicians for Safe Technology and 20,000 (Twenty Thousand) collated by Doctor Opeschak of Harvard University have documented the health dangers of Smart Meters which the company and commission mendaciously denies.

20) Denied.

Upholding the health and rights of the complainant's is in the public interest.

21) Denied. The complainant's refusal is due not to general health concerns, but to specific health concerns:

Mr. Platt's heart condition and Jenna Platt's neurological condition.

These were both itemized in complainant's original complaint. Furthermore, the fact that the commission has upheld the decision to terminate the service of a customer, who refused Smart Meter installation is abjectly cruel.

22) Denied. This is simply a venal justification of denying the rights, and of violating the health of Pennsylvanian's.

Title 66/1501 decrees that electric service must be safe and reasonable. Given the health dangers, fire hazards, and privacy violations, Smart Meters are neither safe or reasonable. The deployment of Smart Meters because of known health risks, violates the customer's constitutional rights. See HAAS vs the PUC, The Energy Policy ACT of 2005, Section 1252, Title 66/1501

23) Denied. The Kreider on VanSchoyck ruling simply demonstrate amorality.

24) Denied. As this is further indication of blatant scrupulosity.

The reciprocal relationship among the administrative law judge's concomitant with the commission and the utility company has already been discussed.

25) Denied. It is illegal for an electric company to install a communication device on any property without express permission from the resident. In addition, the fact that the commission has upheld the termination of power to a customer who has refused Smart Meter installation is morally unctuous and spurious.

26) Denied. Again, this is a bastardization of ACT 129 and the energy policy act of 2005 / Section 1252 and PA Title 66/1501.

The inherent unconstitutionality has heretofore been discussed, whereby HAAS vs PUC set forth the intrinsic danger of Smart Meters.

IV. Conclusion

WHEREFORE, Deborah Engisch-Platt and Kim Platt move that MET-ED's motion to strike be quashed and that a hearing be granted to the complainants.

We (Deborah Engisch-Platt and Kim Platt) hereby certify that a true copy of the foregoing has been furnished to council for MET-ED and the PUC secretary.


Deborah Engisch-Platt

DATE


Kim Platt

DATE



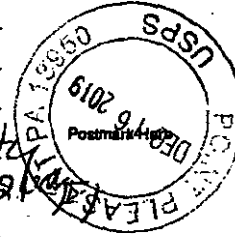
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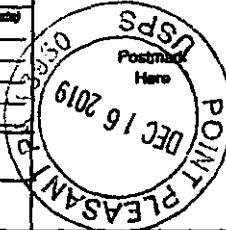
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 Street and Apt. No., or P.O. Box No. 2805 Pottsville Pike Box
 City, State, ZIP+4® 19112-6001

PS Form 3800, April 2015 PSN 7530-02-000-9047 See Reverse for instructions



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Furthermore, the fact that the commission has upheld decisions terminating the service of a customer is a violation of the Americans with Disabilities Act, The Energy Policy Act of 2005, Section 1252 and Title 66/1501.

5) Objection. See previous responses.

6) Not Applicable N/A

7) Admitted

7A) Admitted

7B) Admitted in part. Denied in part (See response to number 4)

7C) No Answer N/A

8) N/A

9) N/A

10) N/A

11) N/A

12) Denied in Part / Admitted in Part – (See response to number 4)

13) Objection. As the company is out of compliance with the original intent of Act 129, which was an OPT-IN measure

14) This assumes a conclusion of law to which no response is required.

15) Objection and Denied. The SMP purposely keep this information under wraps, because of knowledge of the inherent dangers of smart meters. They do not advertise their venal implementation plans.

16) Denied. The SMP and the company as well as the solipsistic reciprocity of the commission all bastardize the original intent of ACT 129.

17) Objection and Denied. The company and the commission are in violation of the public welfare by smart meters as evidenced by 20,000 (Twenty Thousand)

Scientific and Medical studies documenting deleterious health effects. The violation of ACT 129's intent has already been discussed.

18) Denied. As ACT 129 was an OPT-IN measure. This is an example of scurrilous ethics between the commission and the company.

WE DEMAND AN IN-PERSON HEARING

VERIFICATION:

I, Deborah Engisch-Platt and Kim Platt hereby state that the facts set forth above are true and correct to the best of our knowledge, information and belief. We expect the same at a hearing held in this matter. We understand that the statements made herein are made subject to the penalties of 18 Pa.C.S. 4904.

12/04/2019

Date


Deborah Engisch-Platt


Kim Platt

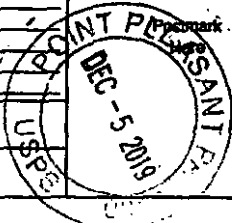
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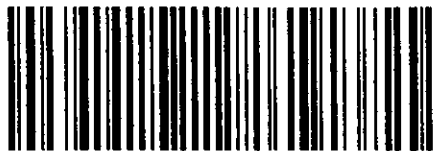


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PS Form 3817, April 2007 PSN 7530-02-000-9065

Platt
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