

Tori L. Giesler, Esq.  
(610) 921-6658  
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February 10, 2020

**VIA ELECTRONIC FILING**

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

**Re: Liza Mousios & Roy Cumming v. Metropolitan Edison Company**  
**Docket Nos. C-2019-3007989, C-2019-3007995**

Dear Secretary Chiavetta:

Enclosed please find the Motion to Compel of Metropolitan Edison Company with regard to the above-captioned matter. This document has been served on the Complainants as shown in the Certificate of Service.

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

Very truly yours,



Tori L. Giesler

krak  
Enclosures

c: As Per Certificate of Service

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

<b>LIZA MOUSIOS AND ROY CUMMING</b>	:	
	:	
v.	:	<b>Docket Nos. C-2019-3007989</b>
	:	
<b>METROPOLITAN EDISON COMPANY</b>	:	<b>C-2019-3007995</b>

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**NOTICE TO PLEAD**

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TO: Liza Mousios and Roy Cumming

Pursuant to 52 Pa. Code § 5.102(b) and the Orders entered January 9 and 31, 2020, you are hereby notified that, if you do not file a written response denying or correcting the enclosed Motion to Compel of Metropolitan Edison Company within **three (3) days** from the service of the Notice, the facts set forth by Metropolitan Edison Company in the Motion may be deemed to be true, thereby requirement no other proof. All pleading, such as a Reply to Motion, must be filed with the Secretary of the Pennsylvania Public Utility Commission, with a copy service to counsel for Metropolitan Edison Company, and where applicable, the Administrative Law Judge presiding over the case.

File with:

Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
P.O. Box 3265  
Harrisburg, PA 17105-3265

With a copy to:

Administrative Law Judge Darlene D. Heep  
Pennsylvania Public Utility Commission  
801 Market Street  
Philadelphia, PA 19107

Lauren M. Lepkoski  
Tori L. Giesler  
FirstEnergy Service Company  
2800 Pottsville Pike  
P.O. Box 16001  
Reading, Pennsylvania 19612-6001

Date: February 10, 2020



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Lauren M. Lepkoski, Esquire  
Tori L. Giesler, Esquire

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

<b>LIZA MOUSIOS AND ROY CUMMING</b>	:	
	:	
<b>v.</b>	:	<b>Docket Nos. C-2019-3007989</b>
	:	<b>C-2019-3007995</b>
<b>METROPOLITAN EDISON COMPANY</b>	:	

**MOTION OF METROPOLITAN EDISON COMPANY TO COMPEL RESPONSES TO  
INTERROGATORIES AND DOCUMENT REQUESTS**

TO THE PENNSYLVANIA PUBLIC UTILITY COMMISSION:

Metropolitan Edison Company (“Met-Ed” or the “Company”) by and through its attorneys, Lauren M. Lepkoski and Tori L. Giesler, and pursuant to 52 Pa. Code §§ 5.371-5.372, hereby files this Motion to compel Liza Mousios and Roy Cumming (“Complainants”) to provide full and complete responses to interrogatories and document requests issued by the Company on January 28, 2020. In support thereof, the Company avers as follows:

**I. BACKGROUND**

1. On February 11, 2019, each of the Complainants filed separate Formal Complaints with the Pennsylvania Public Utility Commission (“Commission”) regarding 68 Marienstein Road, Revere, Pennsylvania 18953, which were both electronically served on the Company on February 21, 2019.

2. On March 13, 2019, the Company filed its Answer and New Matter denying the material allegations of both Formal Complaints. On that same day, the Company also filed Preliminary Objections to both Formal Complaints.

3. On March 28, 2019, each Complainant filed an identical response to the Company’s Answer and New Matter to their respective Formal Complaint.

4. On April 20, 2019, the Complainants filed a joint pleading titled “Response and Preliminary Objections to Metropolitan Edison Company” in response to the Company’s Preliminary Objections and raised their own objections.

5. On April 23, 2019, a Motion Judge Assignment Notice was issued assigning Administrative Law Judge (“ALJ”) Emily I. DeVoe to both proceedings.

6. On May 14, 2019, ALJ DeVoe issued an Interim Order consolidating the Formal Complaints filed by each of the Complainants.

7. May 15, 2019, ALJ DeVoe issued a Corrected Interim Order granting in part and denying in part the Company’s Preliminary Objections

8. On May 16, 2019, ALJ DeVoe issued an Interim Order denying the Complainants’ Preliminary Objections.

9. On May 20, 2019, a Call-In Telephone Pre-Hearing Conference Notice was issued scheduling a prehearing conference for July 23, 2019 for the consolidated Formal Complaints.

10. On May 22, 2019, ALJ DeVoe issued an Interim Order Scheduling a Prehearing Conference for July 23, 2019.

11. On May 31, 2019, in accordance with 52 Pa. Code § 5.341, the Company forwarded to the Complainants interrogatories and document requests (“Company’s Set I Discovery Requests”) via first class mail. In its Discovery Requests, the Company sought information and documents related to the Complainants’ allegations regarding the Company’s smart meters.

12. On June 17, 2019, ALJ DeVoe received correspondence from the Complainants, which was not served upon the Company, wherein they request that the prehearing conference be cancelled and that the matter proceed to a hearing.

13. On June 20, 2019, ALJ DeVoe issued an Interim Order ordering the parties to appear for and participate in the prehearing conference scheduled for July 23, 2019.

14. On July 22, 2019, the Company filed a Motion to Compel.

15. On July 23, 2019, a prehearing conference was held and all parties participated.

16. On July 24, 2019, an Interim Order which extended the deadlines for the Complainants to submit witness information and file a response to the Company's Motion to Compel.

17. On July 26, 2019, the Complainants re-served their discovery responses to the Company's Set I Discovery Requests upon the Company along with proof of mailing from her original submission.

18. By letter dated August 23, 2019, which was received on August 30, 2019, the Complainants forwarded to the Company a set of interrogatories ("Complainants' Set I Discovery Requests").

19. On August 28, 2019, an Interim Order was entered which required the submission of a status report.

20. On September 3, 2019, in accordance with 52 Pa. Code § 5.341, the Company forwarded to the Complainants a second set of interrogatories and document requests ("Company's Set II Discovery Requests") via first class mail.

21. On September 5, 2019, the Company's Motion to Compel was dismissed as moot per an Interim Order.

22. On September 9, 2019, the Company submitted objections to portions of Complainants' Set I Discovery Requests.

23. On September 10, 2019, the Company re-submitted the Company's Discovery Requests, Set I.

24. On September 4, 2019, the Company submitted a status report.

25. On September 20, 2019, the Company submitted an additional status report.

26. On September 23, 2019, the Company submitted responses to the Complainants' Set I Discovery Requests.

27. On October 1, 2019, a Call In Evidentiary Hearing Telephonic Notice was issued.

28. On October 4, 2019, a Prehearing Order was issued.

29. On October 18, 2019, the Company served its proposed exhibits.

30. Also on October 18, 2019, the Complainants filed a "Motion Per our Second Request for Our Inexorable Right to Have an In-Person Hearing with Americans with Disabilities Act Accommodations Removing All Wireless from the Hearing Area."

31. On October 22, 2019, a Hearing Cancellation/Reschedule and a Judge Change Notification was issued.

32. On November 20, 2019, the Complainants filed a "Motion to Delay Our Hearing Until the Outcome of the Pending Ten Appeals Against the Pernicious Smart Meters."

33. On December 13, 2019, a Prehearing Order was issued which denied the Complainants' request to delay the evidentiary hearing.

34. On January 3, 2020, the Complainants filed a "Motion to Stay the Hearing Given the Ensuing Facts for the Orderly Proceeding of Justice."

35. On January 7, 2020, the Company submitted its proposed exhibits.

36. On January 9, 2020, an Order was entered which, *inter alia*, denied the Complainants' Motion to Stay the Hearing, deeming the Complainants' request for

accommodation at hearing moot, cancelled the in-person hearing scheduled for January 14 and 15, 2020, and directed a modified procedural schedule with a modified discovery schedule. Further, a Call-In Telephone Hearing Notice was issued.

37. On January 14, 2019, a Cancellation Notice was issued which cancelled the evidentiary hearings scheduled for January 14 and 15, 2020.

38. On January 15, 2020, the Complainants filed a “Motion to Supplement Exhibits for Continuing In-Writing Hearing.”

39. On January 17, 2019, the Complainants filed what was labeled as a brief.

40. On January 28, 2020, in accordance with 52 Pa. Code § 5.341, the Company forwarded to the Complainants a third set of interrogatories and document requests (“Company’s Set III Discovery Requests”) via first class mail and UPS Overnight Delivery. A full copy of the Company’s Discovery Requests is attached as Exhibit A and proof of delivery is attached as Exhibit B.

41. On January 29, 2020, the Complainants filed a “Motion for Judge Heep to Vacate Her Own Violation of Complainants’ Right to Due Process and Right to Preserve Their Issues on Appeal In Her Preventing Their Use of Their Expert Witness” and “Motion and Request to Deputy Chief Administrative Law Judge Christopher Pell for a Different Judge Such As Administrative Judge DeVoe Whom We Previously Had.”

42. On January 30, 2020, the Company filed a response to the Complainants’ Motions.

43. On January 31, 2020, ALJ Heep issued an Order which, *inter alia*, denied the Complainants’ motion to disqualify a presiding officer and grant the Complainants’ motion for additional time to submit testimony and exhibits of their expert witness, William Bathgate.

44. To date, the Complainants have not filed any objections to the Company's Set III Discovery Requests issued on January 28, 2020 and have not provided any responses or the requested documents by the due date established by 52 Pa. Code § 5.342 and ALJ Heep's Orders entered on January 9 and January 31, 2020. Additionally, no telephone call has been received from Complainants.

## **II. MOTION TO COMPEL**

45. The Commission's regulations permit the discovery of "any matter, not privileged, which is relevant to the subject matter involved in the pending action." 52 Pa. Code § 5.321(c).

46. Generally speaking, this Commission applies a standard of relevance which is less restrictive than that required by parties to present information into the evidentiary record. It is not grounds for objection that the information sought will be inadmissible at hearing if the information sought appears reasonably calculated to lead to the discovery of admissible evidence. 52 Pa. Code § 5.321(c).

47. Discovery may be obtained regarding any matter relevant to the subject matter. Relevant evidence is evidence that tends to make an act at issue more or less probable. Moreover, evidence is relevant if it advances the inquiry in some degree and, thus, has probative value. Although the law does not furnish an absolute test of relevancy, the Pennsylvania Supreme Court follows a two-part analysis for determining relevance. In *Commonwealth v. Stewart*, 461 Pa. 274, 336 A.2d 282 (1975), the Court held that "[i]t must be determined first if the inference sought to be raised by the evidence bears upon a matter at issue in this case and, second, whether the evidence renders the desired inference more probable than it would be without the evidence. *Id.* at 284.

48. The information sought here by the Company is relatively simple and straightforward. It is directly relevant and material to the issues raised by the Complainants in

their Formal Complaint. The Company is entitled to the requested information to enable it to fully investigate what information the Complainants relied on to make the allegations they did in their Formal Complaint. To date, however, the Company has not received any responses or objections to the Company's Set III Discovery Requests from Complainants.

49. The Commission's regulations at 52 Pa. Code § 5.371 address the consequences of a participant's failure to comply with the Commission's discovery regulations. Section 5.371 provides that:

- (a) The Commission or the presiding officer may, on motion, make an appropriate order if one of the following occurs:
  - (1) A party fails to appear, answer, file sufficient answers, file objections, make a designation or otherwise respond to discovery requests, as required under this subchapter.

50. Further, 52 Pa. Code § 5.372 provides that the presiding officer may impose appropriate sanctions upon a party found to be found in violation of the obligations set forth in the Commission's regulations.

51. As a result of the Complainants' failure to provide any response to the Company's Set III Discovery Requests, which demonstrates their lack of cooperation and willingness to participate in this proceeding as required under the Commission's regulations, the Formal Complaint in this proceeding should be dismissed in its entirety.

52. The Company requests that the Complainants be directed to provide full and complete responses to the Discovery Requests to be received by the undersigned counsel for the Company within five business days after entry of an Order Granting the Motion to Compel.

53. In the event the Complainants are directed by the Commission to respond to the Company's Set III Discovery Requests but fail to, the Company respectfully requests that the Formal Complaint against the Company be dismissed in its entirety.

WHEREFORE, Metropolitan Edison Company respectfully requests that the Commission issue an Order compelling the Complainants to fully and completely respond to the Discovery Requests such that the responses are received by counsel for the Company no later than five business days after entry of an Order on the Motion to Compel. Further, in the event the Complainants do not comply with the Order directed by the Commission and fail to respond to the Company's Discovery Requests, the Company respectfully requests that the Commission dismiss in its entirety the consolidated Formal Complaints of Liza Mousios and Roy Cumming.

Respectfully submitted,

Dated: February 10, 2020



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Attorney No. 207742  
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2800 Pottsville Pike  
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(610) 921-6203  
(610) 921-6658  
[llepkoski@firstenergycorp.com](mailto:llepkoski@firstenergycorp.com)  
[tgiesler@firstenergycorp.com](mailto:tgiesler@firstenergycorp.com)

Counsel for Metropolitan Edison Company



Tori L. Giesler, Esq.  
(610) 921-6658  
(330) 315-9263 (Fax)

January 28, 2020

**VIA FIRST CLASS MAIL AND UPS OVERNIGHT DELIVERY**

Liza Mousios  
P.O. Box 116  
Revere, PA 18953

Roy Cumming  
P.O. Box 396  
Revere, PA 18953

**Re: Liza Mousios & Roy Cumming v. Metropolitan Edison Company**  
**Docket No. C-2019-3007989, C-2019-3007995**

Dear Ms. Mousios and Mr. Cumming:

Enclosed please find the Interrogatories and Requests for Production of Documents (Set III) to Liza Mousios and Roy Cumming. Pursuant to 52 Pa. Code §§ 5.341 and 5.349, *et seq.*, your answers are due within five days of service of this letter (February 3, 2020). In addition, any objections are due within three days of service of this letter (January 31, 2020). This document has been served as indicated within the Certificate of Service.

Please review this at your earliest convenience. If you have any questions, please feel free to reach out.

Very truly yours,

Tori L. Giesler

Enclosures

c: As Per Certificate of Service  
The Honorable Darlene D. Heep, Public Utility Commission (Cover Letter and Certificate)  
Rosemary Chiavetta, Esq., Public Utility Commission (Cover Letter and Certificate)

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**LIZA MOUSIOS AND ROY CUMMING** :  
 :  
 v. : **Docket No. C-2019-3007989**  
 : **C-2019-3007995**  
**METROPOLITAN EDISON COMPANY** :

**INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS OF  
METROPOLITAN EDISON COMPANY TO LIZA MOUSIOS AND ROY CUMMING,  
SET III**

Metropolitan Edison Company hereby propounds these Interrogatories and Requests for Production of Documents (Set III) to Liza Mousios and Roy Cumming (the “Complainants”). Telephone or other contact concerning availability and timing of formal responses is encouraged. The answer to each interrogatory should be started on a new page. The answers should restate the question asked and indicate the person(s) supplying the information.

Pursuant to 52 Pa. Code § 5.342, you must send your answers to me within 5 days (February 3, 2020) and objections within 3 days (January 31, 2020). Your answers and objections should not be filed with the Pennsylvania Public Utility Commission. You should only file the cover letter and certificate of service, with the Commission’s Secretary Rosemary Chiavetta and send a copy to Administrative Law Judge Darlene D. Heep. If you have any objection to any of the interrogatories or the request for documents, please identify the interrogatory or request and state your objection in full as to why you should not have to answer/produce it. Any objection not raised within the 10-day period provided for by 52 Pa. Code § 5.342(c) will be deemed waived and you will not be permitted to raise the objection at a later time.

Dated: January 28, 2020

### INSTRUCTIONS

A. In answering these Interrogatories and Requests for Production of Documents, please furnish all information available to you, including any such information possessed by others that you can obtain, and not merely such information known of your own personal knowledge. If you cannot answer the Interrogatories and Requests in full after exercising due diligence to secure the information to do so, so state and answer to the extent possible.

B. Other than for the reasons identified herein, you must provide an answer to all Interrogatories and Requests for Production of Documents. If the answer to the question is “none” or “unknown,” such statement must be written in the answer. If you consider the question to be inapplicable, “N/A” must be written in the answer. If an answer is omitted because of a claim of privilege, the basis of privilege is to be stated.

C. If the answer to any of the Interrogatories and Requests for Production of Documents is that you lack knowledge of some or all of the requested information, describe all efforts made by you to obtain the information necessary to answer that Interrogatory or Request.

D. These Interrogatories and Requests for Production of Documents are to be deemed continuing in nature, and you shall promptly supply, by way of supplemental response, any additional responsive information that may become known to you or anyone acting on your behalf after your answers have been prepared or served.

E. As used herein, the terms “Complainants” and “you” refer to Liza Mousios, Roy Cumming and their attorneys, agents, representatives, or anyone else working on their behalf.

F. As used herein, the terms “Company” or “Respondent” refer to Metropolitan Edison Company, and any agent, agency, or affiliate thereof.

G. As used herein, the term “proceeding” refers to the instant complaint proceeding at the Pennsylvania Public Utility Commission at Docket No. C-2019-3007989 and C-2019-3007995.

H. As used herein, the terms “service location,” “property,” or “home” refer to your service address of 68 Marienstein Road, Revere, Pennsylvania 18953.

I. As used herein, the term “household” refers to you and all other individuals who reside at the service location.

J. As used herein, the terms “document” or “documentation” includes any written, printed, typed, recorded, or graphic matter, whether produced or reproduced or stored on paper, cards, tapes, film, electronic facsimile, computer storage devices or any other devices or media, including, but not limited to papers; books; letters; photographs; objects; tangible things; correspondence; e-mails; websites; webpages; telegrams; cables; telex messages; memoranda; medical records; notes; notations; records; work papers; transcripts; minutes; reports and recordings of telephone or other conversations, or of interviews, or of conferences, or of other meetings; affidavits; statements; opinions; proposals; reports; surveys; plans; studies; analyses; audits; evaluations; contracts; agreements; journals; statistical records; invoices; receipts; desk calendars; appointment books; diaries; lists; tabulations; summaries; sound recordings; computer printouts; data processing input and output; microfilms; all records kept by electronic, photographic, or mechanical means; and things similar to any of the foregoing, however denominated. When one or more of the foregoing documents is requested or referred to, the request or reference shall include, but is not limited to, the original and each and every copy and draft thereof having writings, notations, corrections, or markings unique to such copy or draft.

K. As used herein, all other words are to be given their ordinary and usual meanings, according to a current edition of Webster's Dictionary.

**INTERROGATORIES AND REQUEST FOR PRODUCTION OF DOCUMENTS OF  
METROPOLITAN EDISON COMPANY TO LIZA MOUSIOS AND ROY CUMMING,  
SET III**

1. Please provide a full copy of the curriculum vitae (CV) of William Bathgate (Mr. Bathgate), including, but not limited to, a complete listing of educational and work experience, degrees earned, professional certifications, and scientific publications.
2. Please identify the jurisdictions in which Mr. Bathgate is licensed as a professional engineer and provide a copy of his licensure(s).
3. Please provide copies of all measurements and calculations Mr. Bathgate has made of radio frequency ("RF") fields at your residence, workplaces, and in your residential neighborhood.
  - (a) For each measurement, identify the name, manufacturer, and model of the device used for the measurement, the date on which the measurement was made, and the location at which the measurement was made.
4. Please provide a full, as-published copy of each scientific study that provides a basis for any of Mr. Bathgate's expert opinions in this case, including, but not limited to, the following opinions identified in your Witness List:
  - (a) "the physical harm to plaintiffs from the adjacent smart meter";
  - (b) "the dangerous radiation levels emanating from said meter";
  - (c) "the mendacity of the electric companies regarding the actual amount of radiation, dirty electricity and secondary antennae effect".

5. Please identify each “physical harm to plaintiffs” about which Mr. Bathgate intends to testify, and for each such “physical harm” provide copies of any medical evaluation, testing and/or diagnosis conducted by Mr. Bathgate.
6. Please identify the “dangerous radiation levels” you claim will be emitted by the advanced metering infrastructure (AMI) meter being used by the Company and provide copies of all calculations and measurements of RF fields at your residence, workplaces, and or in your residential neighborhood.
  - (a) For each measurement, identify the name, manufacturer, and model of the device used for the measurement, the date on which the measurement was made, and the location at which the measurement was made.
7. Please identify the “actual amount of radiation” you claim will be emitted by the AMI meter being used by the Company and provide copies of all calculations and measurements of RF fields at your residence, workplaces, and in your residential neighborhood.
  - (a) For each measurement taken to determine the “actual amount of radiation,” identify the name, manufacturer, and model of the device used for the measurement, the date on which the measurement was made, and the location at which the measurement was made.
8. Please describe what you mean by “dirty electricity”, identify how the AMI meter being used by the Company will cause “dirty electricity” in your residence and

- provide copies of all calculations and measurements of such “dirty electricity” at your residence.
9. Please describe what you mean by “secondary antenna effect”, identify how the AMI meter being used by the Company will cause a “secondary antenna effect” and provide copies of all calculations and measurements of such “secondary antenna effect” at your residence.
  10. Please provide copies of all documents you provided to Mr. Bathgate, including, but not limited to, all medical records, statements about RF health claims, and measurements or calculations of any electromagnetic fields (“EMF”), RF fields, transients, harmonics, or so-called “dirty electricity” on your property and/or in your residence.
  11. Please identify each communication between Mr. Bathgate and any fact or expert witness you have identified, whether face to face, by telephone, by electronic mail, text, facsimile or other electronic communication, letter, or by any other means.
    - (a) For each in person meeting or communication by telephone call, please provide the date, time and length of each meeting or communication, and a description of what was said.
    - (b) For each written communication, please provide a copy of the communication.
  12. Please identify each instance when Mr. Bathgate has previously appeared as an expert witness, and, for each such instance, provide: (a) the full names of the

parties and the name and docket number, if any, of the matter; (b) the court, agency, or other entity which held the proceeding in which Mr. Bathgate appeared; (c) a copy of all expert reports and/or disclosures prepared by Mr. Bathgate; and (d) the transcripts of all testimony given by Mr. Bathgate.

13. Please provide a copy of the CV of Dr. William Kracht (Dr. Kracht), including, but not limited to, a complete listing of educational and work experience, degrees earned, professional certifications, and scientific publications.
14. Please provide a copy of Dr. Kracht's complete medical record for Liza Mousios, including, but not limited to, any medical evaluation and testing that provides the basis for Dr. Kracht's diagnosis that Liza Mousios experiences "electromagnetic sensitivity", including any reports showing that Liza Mousios is sensitive to the specific electromagnetic frequencies used by the Company's AMI meter.
15. Please identify all "health issues" that you claim Liza Mousios "never experienced prior to the adjacent smart meter installation."
16. Please identify all "previous health issues" for Liza Mousios that you claim "have been aggravated by the smart meter."
17. Please provide a copy of Dr. Kracht's complete medical record for Roy Cummings, including, but not limited to, any medical evaluation and testing that provides the basis for Dr. Kracht's diagnosis that Roy Cummings will experience any health issues related to any aspect of the AMI meter being used by the Company.

18. Please identify each communication you have had with Dr. Kracht, whether face to face, by telephone, by electronic mail, text message, facsimile, or other electronic communication, letter, or by any other means.
  - (a) For each in person meeting or communication by telephone call, please provide the date, time and length of each meeting or communication, and a description of what was said.
  - (b) For each written communication, please provide a copy of the communication.
19. Please provide copies of all documents that you received from Dr. Kracht, including, but not limited to, all medical reports, health evaluations and treatment recommendations, and measurements, calculations, studies, and other analyses related to EMF, RF and/or any aspect of the AMI meter being used by the Company.
20. Please provide a full, as-published copy of each scientific study that provides a basis for any of Dr. Kracht's opinions in this case.
21. Please provide copies of any and all additional materials that provide any basis for Dr. Kracht's opinions in this case.
22. Please provide copies of all measurements or calculations Dr. Kracht has made of RF fields at your residence, workplaces or in your residential neighborhood.
  - (a) For each measurement, identify the name, manufacturer, and model of the device used for the measurements, the date on which the measurement was made, and the location at which the measurement was made.

23. Please identify each communication between Dr. Kracht and any fact or expert witness you have identified, whether face to face, by telephone, electronic message, text message, facsimile or other electronic communication, letter, or any other means.
- (a) For each in person meeting or communication by telephone call, please provide the date, time and length of each meeting or communication, and a description of what was said.
- (b) For each written communication, please provide a copy of the communication.
24. Please identify each instance when Dr. Kracht has previously appeared as an expert witness, and for each instance provide: (a) the full names of all of the parties, name and docket number, if any, of the matter; (b) the court, agency, or other entity which held the proceeding in Dr. Kracht appeared; (c) a copy of all expert reports or disclosures prepared by Dr. Kracht; and (d) the transcripts of all testimony given by Dr. Kracht.
25. Please provide a full copy of the CV of Ms. Donna Ott (Ms. Ott), including, but not limited to, a complete listing of educational and work experience, degrees earned, professional certifications, and scientific publications.
26. Please provide copies of all documents you provided to Ms. Ott, including, but not limited to, all medical records, statements about RF health claims, and measurements or calculations of any EMF, RF fields, transients, harmonics or so-called “dirty electricity” on your property and/or in your residence.

27. Please identify each communication between Ms. Ott and any fact or expert witness you have identified, whether face to face, by telephone, by electronic mail, text message, facsimile or other electronic communication, letter, or by any other means.
- (a) For each in person meeting or communication by telephone call, please provide the date, time and length of each meeting or communication, and a description of what was said.
  - (b) For each written communication, please provide a copy of the communication.
28. Please provide copies of all measurements and calculations Ms. Ott has made of RF fields at your residence, workplaces, and in your residential neighborhood.
- (a) For each measurement, identify the name, manufacturer, and model of the device used for the measurement, the date on which the measurement was made, and the location at which the measurement was made.

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**LIZA MOUSIOS AND ROY CUMMING** :  
 :  
 :  
 v. : **Docket No. C-2019-3007989**  
 : **C-2019-3007995**  
 :  
**METROPOLITAN EDISON COMPANY** :

**CERTIFICATE OF SERVICE**

I hereby certify that I have this day served a true copy of the Interrogatories and Requests for Production of Documents of Metropolitan Edison Company to Liza Mousios and Roy Cumming (Set III) 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 as follows:

Liza Mousios  
P.O. Box 116  
Revere, Pennsylvania 18953

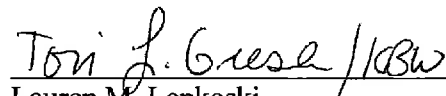
Roy Cumming  
P.O. Box 396  
Revere, PA 18953

Service by UPS Overnight Delivery as follows:

Liza Mousios  
68 Marienstein Road  
Revere, Pennsylvania 18953

Roy Cumming  
68 Marienstein Road  
Revere, PA 18953

Dated: January 28, 2020



Lauren M. Lepkoski  
Tori L. Giesler  
FirstEnergy Service Company  
2800 Pottsville Pike  
P.O. Box 16001  
Reading, Pennsylvania 19612-6001  
(610) 921-6203  
(610) 921-6658  
llepkoski@firstenergycorp.com  
tgiesler@firstenergycorp.com

# Proof of Delivery

Dear Customer,

This notice serves as proof of delivery for the shipment listed below.

**Tracking Number**

1ZAE14401361986696

**Weight**

0.00 LBS

**Service**

UPS Next Day Air Saver®

**Shipped / Billed On**

01/28/2020

**Delivered On**

01/29/2020 11:22 A.M.

**Delivered To**

OTTSVILLE, PA, US

**Received By**

DRIVER RELEASE

**Left At**

Front Door

Thank you for giving us this opportunity to serve you. Details are only available for shipments delivered within the last 120 days. Please print for your records if you require this information after 120 days.

Sincerely,

UPS

Tracking results provided by UPS: 02/07/2020 11:50 A.M. EST

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

<b>LIZA MOUSIOS AND ROY CUMMING</b>	:	
	:	
<b>v.</b>	:	<b>Docket Nos. C-2019-3007989</b>
	:	<b>C-2019-3007995</b>
<b>METROPOLITAN EDISON COMPANY</b>	:	

**CERTIFICATE OF SERVICE**

I hereby certify that I have this day served a true copy of the Motion to Compel of Metropolitan Edison Company 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:

Liza Mousios  
P.O. Box 116  
Revere, PA 18953

Administrative Law Judge Darlene D. Heep  
Pennsylvania Public Utility Commission  
801 Market Street  
Philadelphia, PA 19107

Roy Cumming  
P.O. Box 396  
Revere, PA 18953

Service by UPS Overnight Delivery, Postage prepaid, as follows:

Roy Cumming  
68 Marienstein Road  
Revere, PA 18953

Liza Mousios  
68 Marienstein Road  
Revere, PA 18953

Dated: February 10, 2020



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Lauren M. Lepkoski  
Tori L. Giesler  
FirstEnergy Service Company  
2800 Pottsville Pike  
P.O. Box 16001  
Reading, Pennsylvania 19612-6001  
(610) 921-6203  
(610) 921-6658  
[llepkoski@firstenergycorp.com](mailto:llepkoski@firstenergycorp.com)  
[tgiesler@firstenergycorp.com](mailto:tgiesler@firstenergycorp.com)