

432 E. Wesner Rd
Blandon, PA 19510
February 3, 2020

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

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

PA P.U.C.
SECRETARY'S BUREAU

2020 FEB -5 AM 10:38

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Dear Ms. Chiavetta:

Please find enclosed Complainant's Motion for Discovery and Revised Litigation Schedule. I am also serving copies to the Honorable Tori Giesler of First Energy Services Company and to the Honorable Francis Brady, Administrative Law Judge, Pennsylvania Public Utilities Commission.

Thank you for your attention to this matter.

Very truly yours,



Heidi Fiedler

Enclosures

cc: The Honorable Francis Brady, Pennsylvania Public Utility Commission
The Honorable Tori Giesler, First Energy Services Company

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

HEIDI FIEDLER

V.

METROPOLITAN EDISON COMPANY

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Docket No. C-2018-3003642

MOTION FOR DISCOVERY AND REVISED LITIGATION SCHEDULE

Complainant files this Motion for Discovery and Revised Litigation Schedule. Since the last amended Complaint that Complainant filed in February 28, 2019, additional serious information regarding Respondent's safety and environmental record was uncovered that supports her Complaint. Accordingly, Complainant filed her Third Amended Complaint. In support of her Motion, Complainant respectively submits the following:

1. Complainant's research indicated that she had to address FirstEnergy Corp.'s and Respondent's safety and environmental record in her Complaint in order to raise the issue at her PUC hearing. Reports indicate that FirstEnergy has paid \$1.2 billion in penalties since 2000. Complainant requests 90 days to complete her additional discovery for her Third Amended Complaint. As a pro se Complainant, additional time is necessary to properly prepare for the in person hearing.
2. After completion of discovery, filing of status reports and witness lists, Complainant requests the scheduling of an in-person hearing. Complainant respectively requests that both parties are consulted to schedule a mutually agreeable date for the in-person hearing.
3. Finally, no one is harmed by the revised litigation scheduling.

Complainant respectively requests that the Commission grant Complainant's request for Discovery and a Revised Litigation Schedule.

Respectively submitted,



Heidi Fiedler
432 E. Wesner Rd
Blandon, PA 19510

Dated: February 3, 2020

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CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true and correct copy of the Motion For Discovery and Revised Litigation Schedule upon the individuals listed below, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

Service by Hand delivery, to:

Tori Giesler, Esq

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

Service by email and First Class Mail, to:

Hon. Francis J. Brady

Administrative Law Judge
Pennsylvania Public Utility Commission
801 Market St., Suite 4063
Philadelphia, PA 19107

Dated: February 3, 2020

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