

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

March 5, 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 and Roy Cumming v. Metropolitan Edison Company  
Docket No. C-2019-3007989 and C-2019-3007995**

Dear Secretary Chiavetta:

In accordance with the Interim Order issued on February 25, 2020 in the above-referenced matter, Metropolitan Edison Company (“Met-Ed”) hereby states that Met-Ed’s Set III Discovery Requests, Numbers 25-28, are relevant to the above-referenced matters. Ms. Mousios and Mr. Cumming stated in their letter of August 7, 2019 that they would be utilizing Ms. Donna Ott as their fourth witness and that, among other topics, Ms. Ott “will testify as to her device registering the radiation in Plaintiffs’ home as nearly double the radiation of a cell tower.” This summary of Ms. Ott’s testimony implies that she would be providing some form of expert testimony about radio frequency (“RF”) exposure levels. The discovery requests regarding Ms. Ott, Numbers 25-28, therefore relate to: (1) Ms. Ott’s credentials (i.e. her curriculum vitae); (2) information relevant to opinions about RF fields provided to and received from Ms. Ott; and (3) copies of measurement or calculations of RF fields made by Ms. Ott related to Ms. Mousios and Mr. Cumming.

Based upon this information, Met-Ed believes that the its Set III Discovery Requests, Numbers 25-28, are entirely relevant and necessary to the above-referenced formal complaints.

Copies of this letter are being provided in accordance with the attached Certificate of Service. Should you have any questions regarding this report, please do not hesitate to contact me.

Very truly yours,



Tori L. Giesler

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c: As Per Certificate of Service

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

<b>LIZA MOUSIOS AND ROY CUMMING</b>	:	
	:	
<b>v.</b>	:	<b>Docket No. 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 foregoing document 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

Administrative Law Judge Darlene D. Heep  
Pennsylvania Public Utility Commission  
Office of Administrative Law Judge  
801 Market Street, Suite 4063  
Philadelphia, PA 19107


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: March 5, 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](mailto:llepkoski@firstenergycorp.com)  
[tgiesler@firstenergycorp.com](mailto:tgiesler@firstenergycorp.com)