BEFORE THE

PENNSYLVANIA PUBLIC UTILITY COMMISSION

NOREEN MCCARTHY	:	
	:	
v.	:	Docket No. C-2019-3006923
	:	
METROPOLITAN EDISON COMPANY	:	

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of my Response to Motion to Compel and Request for Retraction upon the individuals listed below, in accordance with the requirements of 52 Pa. Code § 1.54.

Service by email, as follows:

Lauren M. Lepkoski
Tori L. Giesler
FirstEnergy Service Company
2800 Pottsville Pike
P.O. Box 16001
Reading, PA 19612-6001
llepkoski@firstenergycorp.com
tgiesler@firstenergycorp.com

Dated: March 13, 2020

Signature 

Noreen McCarthy
18 Millstone Lane
Pottstown, PA 19465
610-469-2009
contactnoreen1@gmail.com

Noreen McCarthy
18 Millstone Lane
Pottstown, PA 19465
610-469-2009

March 13, 2020

Rosemary Chiavetta, Secretary
PA Public Utility Commission
400 North Street
Harrisburg, PA 17120

RE: Response to Motion to Compel and Request for Retraction

Docket No. C-2019-3006923

Dear Ms. Chiavetta:

I appropriately responded to Met-Ed's Interrogatories Set II by email on March 5, 2020. When I received an email from Kaitlyn B. Weidel, Executive Assistant FirstEnergy Service Company (aka Met-Ed) on March 11, 2020 stating their Motion to Compel I sent her an email response on March 11, 2020 saying the following, *"Dear Kaitlyn, I am very confused. My answers to set II interrogatories were emailed on 3/5/20. Would you like me to resend them? Noreen McCarthy"* As of the writing of this letter I have not received a response from her.

I wish for their Motion to Compel to be denied and I'm requesting a retraction.

Sincerely,

Noreen McCarthy

cc: ALJ Jeffrey Watson

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PENNSYLVANIA PUBLIC UTILITY COMMISSION

NOREEN MCCARTHY	:	
	:	
v.	:	**Docket No. C-2019-3006923**
	:	
METROPOLITAN EDISON COMPANY	:	

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of my answers to the Interrogatories and Requests for Production of Documents (Set II) upon the individuals listed below, in accordance with the requirements of 52 Pa. Code § 1.54.

Service by email, as follows:

Lauren M. Lepkoski
Tori L. Giesler
FirstEnergy Service Company
2800 Pottsville Pike
P.O. Box 16001
Reading, PA 19612-6001
llepkoski@firstenergycorp.com
tgiesler@firstenergycorp.com

Dated: March 5, 2020

Signature: Noreen McCarthy

Noreen McCarthy
18 Millstone Lane
Pottstown, PA 19465
610-469-2009
contactnoreen1@gmail.com

1.36 Verification

Verification

I, Noreen McCarthy, hereby state that the facts set forth are true (or are true and correct to the best of my knowledge, information and belief) and that I expect to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa. C.S. section 4904 (relating to unsworn falsification to authorities.

March 5, 2020	Noreen McCarthy
Date	Signature

Noreen McCarthy
18 Millstone Lane
Pottstown, PA 19465
610-469-2009

March 5, 2020

VIA E-MAIL

Lauren M. Lepkoski
Tori L. Giesler
FirstEnergy Service Company
2800 Pottsville Pike
P.O. Box 16001
Reading, PA 19612-6001
llepkoski@firstenergycorp.com
tgiesler@firstenergycorp.com

Re: Noreen McCarthy v. Metropolitan Edison Company
Docket No. C-2019-3006923

Dear Ms. Giesler:

Enclosed please find my responses to the Interrogatories and Requests for Production of Documents (Set II) of MetEd. This document has been E-filed to the PUC as shown and emailed to you as per the Certificate of Service.

Please feel free to contact me with any questions.
Sincerely,

Noreen McCarthy

Enclosure
c: ALJ Jeffery A. Watson (Cover Letter, Certificate of Service, and Verification Statement)
Rosemary Chiavetta, Esq., Public Utility Commission (Cover Letter, Certificate of Service, and Verification Statement)

Noreen McCarthy's Response to Met-Ed Interrogatories Set II

1. Dr. Slawecki's CV is in an attachment in the email sent 3/5/20.

2. Dr. Slawecki will present testimony similar to that proffered in Bazan v West Penn Power, C-2017-2640338.

3. See answer to 2.

4. N/A

5. N/A

6. See answer to 2.

7. N/A

8. N/A

9. See answer to 2.

10. See answer to 2.

11. N/A

12-22. At this time I have been unable to get a commitment of availability from Dr. Schoechle. If and when I do he will submit his expert testimony at an appropriate time as per Judge Watson's litigation schedule.

23. Please refer to Mr. Zimmerman's resume in email attachment.

24-26. Mr. Zimmerman will submit his expert testimony at an appropriate time as per Judge Watson's litigation schedule.

27. To my knowledge Mr. Zimmerman has not had any legal training.

28. To my knowledge Mr. Zimmerman has not worked for a public utility company.

29. See answer 28.

30. (i) PECO Energy Corporation, an Exelon Company.

(ii) Laura does not know the make and model of the AMR meter, but she does know it was an AMR meter, which PECO demanded the return of, so PECO is in possession of it now if they have not discarded it, and if you want the answer to this question, you would have to ask PECO. Laura's lawyer returned the AMR meter to Ward Smith, attorney for PECO, in 2016.

(iii) THE AMR meter was placed on Laura's home in 2002.

(iv) and (v) Laura will be willing to answer the rest of these questions to the best of her ability after any and all people to whom they will share this HIPAA protected information sign a confidentiality agreement to protect Laura's HIPAA protected health information. A confidentiality agreement is in the process of being prepared. It will be emailed to you when it is completed.

31. Please see p. 9 II b. on my Second Amended Formal Complaint.

32. (i-iv) I am still in the process of organizing my research at this time.

33. https://www.wirelesseducationaction.org/dr-martin-pall/ This is one link that explains the research of Dr. Martin Pall. In reading his research I now know that all devices that emit microwave/RF radiation and that all wireless communication devices put out polarized EMFs that carry information via pulsations such as a smart meter, which causes activation of voltage-gated calcium channels (VGCCs) which in turn causes many health problems that are being reported by many people.

"5G: Great risk for EU, U.S. and International Health! Compelling Evidence for Eight Distinct Types of Great Harm Caused by Electromagnetic Field (EMF) Exposures and the Mechanism that Causes Them

Written and Compiled by Martin L. Pall, PhD
Professor Emeritus of Biochemistry and Basic Medical Sciences
Washington State University
Address: 638 NE 41st Ave., Portland OR 97232 USA
martin_pall@wsu.edu 503-232-3883 May 17, 2018

Summary:
We know that there is a massive literature, providing a high level of scientific certainty, for each of eight pathophysiological effects caused by non-thermal microwave frequency EMF exposures. This is shown in from 12 to 35 reviews on each specific effect, with each review listed in Chapter 1, providing a substantial body of evidence on the existence of each effect. Such EMFs:
1.Attack our nervous systems including our brains leading to widespread neurological/neuropsychiatric effects and possibly many other effects. This nervous system attack is of great concern.
2.Attack our endocrine (that is hormonal) systems. In this context, the main things that make us functionally different from single celled creatures are our nervous system and our endocrine systems – even a simple planaria worm needs both of these. Thus the consequences of the disruption of these two regulatory systems is immense, such that it is a travesty to ignore these findings.
3.Produce oxidative stress and free radical damage, which have central roles in essentially all chronic diseases.
4.Attack the DNA of our cells, producing single strand and double strand breaks in cellular DNA and oxidized bases in our cellular DNA. These in turn produce cancer and also mutations in germ line cells which produce mutations in future generations.
5.Produce elevated levels of apoptosis (programmed cell death), events especially important in causing both neurodegenerative diseases and infertility.
6.Lower male and female fertility, lower sex hormones, lower libido and increased levels of spontaneous abortion and, as already stated, attack the DNA in sperm cells.
7.Produce excessive intracellular calcium [Ca2+]i and excessive calcium signaling.
8.Attack the cells of our bodies to cause cancer. Such attacks are thought to act via 15 different mechanisms during cancer causation.

There is also a substantial literature showing that EMFs also cause other effects including life threatening cardiac effects (Chapter 3). In addition substantial evidence suggests EMF causation of very early onset dementias, including Alzheimer's, digital and other types of dementias (Chapter 3); and there is evidence that EMF exposures in utero and shortly after birth can cause ADHD and autism (Chapter 5).

Each of these effects is produced via the main mechanism of action of microwave/lower frequency EMFs, activation of voltage-gated calcium channels (VGCCs) (Chapter 2). Each of them is produced via what are called downstream effects of VGCC activation. It follows from this that we have a good understanding not only that these effects occur, but also how they can occur. The extraordinary sensitivity of the VGCC voltage sensor to the forces of the EMFs tells us that the current safety guidelines allow us to be exposed to EMF levels that are something like 7.2 million times too high. That sensitivity is predicted by the physics. Therefore, the physics and the biology are each pointing to the same mechanism of action of non-thermal EMFs.

The different effects produced are obviously very deep concerns. They become much deeper and become existential threats when one considers that several of these effects are both cumulative and eventually irreversible. There is substantial evidence for the cumulative nature and eventual irreversibility of the neurological/neuropsychiatric effects, of the reproductive effects, the mutational DNA effects, the cardiac effects, of some but not other of the hormonal effects (Chapter 3); any causation of ADHD and autism may add additional concerns (here the cumulative nature is probably limited to the perinatal period). When we know that sperm counts have dropped by more than 50% throughout the technologically advanced countries on earth, it is difficult to avoid the conclusion that the vast majority of the population in those countries is already substantially impacted. The same conclusion can be made based on the widespread nature of the neuropsychiatric effects in those countries. Both of those effects will get much much worse even with no

increase in current exposures, due to the cumulative nature and irreversibility of these effects. I expect we will see crash in human reproduction almost to zero as happened in the Magras and Xenos mouse study which I estimate to occur within about 5 years, without any increases in our exposures. Obviously 4G and 5G will make the situation much worse. Similarly I expect that the deterioration in brain function that we are already seeing will seal our fate if we fail to act rapidly and vigorously. Our collective brain function may become completely incapable of dealing with such a mega-crisis situation.

Now it can be argued that some of these may not develop as I expect, although those expectations are based on the best available evidence. One may even be able to argue this for all of those expectations. However, when we have substantial risk of multiple existential threats to every single technologically advanced country on earth, failure to act vigorously means there is a very high probability of complete destruction of these societies. And the chaos which would inevitably ensue, in a world that still has nuclear weapons, may well lead to extinction. In the face of these types or risk, the only reasonable course is to move with great vigor to stop new exposures and lower current exposures. One can still access the internet, using wired connections. And we can lower cell phone tower and cell phone radiation substantially. Smart meters, if needed, can work via wired connections.

Over 60% of this document (Chapters 5 & 6), is focused on the failures of statements from SCENIHR, the telecommunications industry, the U.S. FCC and the U.S. FDA to reflect the science. Their statements repeatedly omit much, often all of the most important science. Their statements are rife not only with omissions, but also with easily demonstrable falsehoods and with false logic. These have often occurred at times where we know that they knew better. These have occurred along with vigorous efforts by the telecommunications industry to corrupt the science by attacking individual scientists whose only fault is that they have obtained important findings that the industry does not like. These attacks have occurred along with vigorous efforts to corrupt two agencies that have important regulatory roles.

There are also possible concerns about individual industry-linked research studies. All wireless communication devices put out polarized EMFs that carry information via pulsations. Both the pulsations and the polarization make these EMFs much more biologically active. There are three other factors that also influence the production of effects. Several industry-linked studies may have used these factors, along with using very tiny numbers of individual animals in their studies, to produce studies which may have been designed to fail (Chapter 5). It is not clear at this point whether this type of concern is quite limited or whether it is very broad.

The European Commission has done nothing to protect European citizens from any of these very serious health hazards and the U.S. FDA, EPA and National Cancer Institute have done nothing to protect American citizens. The U.S. FCC has been much worse than that, acting vigorously with wanton disregard for our health."

34. See answer number 33.

(i) I am organizing and verifying documents at this time and I am not ready to decide which ones I plan to rely on.

(ii) see answer number 34. (i)

(iii) see answer number 33.

35. (i) see answer number 33.

(ii-iv) see answer number 34 (i)

36. I am not sure at this time. I plan on researching the topic of smart meter in relation to privacy and security when the time allows.

37. (i-iii) n/a at this time.

TANIA M. SLAWECKI

The Pennsylvania State University
108 Materials Research Laboratory
University Park, PA 16802
Phone: 814-865-0265, **Email:** tms9@psu.edu

Education

1987 B.A. Astronomy/Physics (minor: Philosophy), Lycoming College, Williamsport, PA
1989 M.S. Physics: Low Temperature Acoustics, Penn State University, University Park, PA
1995 Ph.D. Materials Science & Engineering: Polymer Physics, Penn State University

Professional Experience

2010 - **Research Associate, Microwave Processing & Engineering Center, Materials Research Institute, Penn State University**
Conduct proprietary research for industry and government agencies to fabricate new materials or improve on conventionally processed ones using microwave processing, an ecologically sensible, energy-saving manufacturing method. In charge of laboratory safety and equipment maintenance, trouble-shooting and repair; assist students with microwave-related projects that utilize our facilities; gradually preparing manuals for our custom designed microwave furnaces ranging from 1.5 kW to 6 kW powered systems, including multi-mode and single-mode microwave cavities and 915 MHz, 2.45 GHz and 5.8 GHz systems. Use materials characterization tools, most often x-ray diffraction and scanning electron microscopy, to evaluate microwave fabricated materials. Materials include powdered metals, ceramics, alloys and polymers with special studies that involve evaluating properties of materials in pure electric or magnetic field components of the microwave to help us understand what part of the microwave field is most influential on outcome. Prepare detailed reports on findings.

2006 - 2010 **Research Associate, Materials Research Institute at Penn State**. With Prof. Rustum Roy, utilized materials characterization tools to investigate various radiation fields and their effects on physical matter, especially water; large focus on structure of water and investigating ultradilute colloidal solutions and waters having unique properties. Used materials characterization tools including Raman, infrared, and UV-Vis spectroscopies, surface tension and zeta potential measurements, Gas Discharge Visualization (GDV), and numerous others as relevant to the situation.

2004 – 2006 **Co-PI, Bios-Materials Research Initiative, Materials Research Lab, Penn State**
With Prof. Rustum Roy, obtained seed grant funding to explore phenomena at the interface between materials science and living systems with a strong focus on evaluating unconventional electromagnetic therapeutic devices.

2001 - 2004 **Director, The Center for Sustainability, College of Engineering, Penn State**. Oversaw the establishment of 8.5-acre demonstration site for ecological technologies; instructed and supervised students in hands-on projects including developing a biointensive mini-farm, design and construction of small structures using recycled materials and earthen architecture; small passive and active solar projects including a 1.5 kW PV array; wind-power project; a small constructed wetlands; various "living machine" models for water treatment; and PI on the Growing Greener grant funded Penn State Living Machine Project for ecological wastewater treatment. Administrative and financial responsibilities.

2000 - 2006 **Assistant Professor, Science, Technology and Society Program, Penn State** …an interdisciplinary program in the College of Engineering. Developed and taught 400-level courses "Projects in Sustainable Living", "Living Machines: From Conception to Construction", "Green Design and Technologies", and the 200-level "Integrative Medicine and Society". Developed, secured grant funding for and co-taught a pilot course on "Integrated Systems and LEED Certification" for senior engineering and design students at Penn State University, working in collaboration with the U.S. Green Building Council.

1998 - 2000 **Research Associate, The Center for Sustainability** at Penn State University and in the Science, Technology and Society Program at Penn State. Assisted with development and implementation of the first "Projects in Sustainable Living" hands-on learning course, supervised student projects and oversaw the development plans and implementation of the first 7-acre demonstration site provided to the Center for Sustainability which entailed working with university administrators and local code officials.

1995 – 1998 **Physical Scientist, National Institute of Standards and Technology, Gaithersburgh, MD** Responsible for assisting guest researchers to conduct experiments on the two Small Angle Neutron Scattering (SANS) beam lines in the Reactor Radiation Division. Responsible for ensuring guest researchers followed radiation and laboratory safety regulations. Reviewed and helped to score applications submitted for beam line use. Primarily in charge of the shear cell apparatus used on the beam line in addition to other standard configurations.

1989-1995 **Research Assistant**, **Department of Materials Science**, Penn State University

1987-1989 **Research Assistant**, **Department of Physics**, Penn State University

Membership/Professional Organizations

2001 - 2004 Pennsylvania Partners in Agriculture, Health, Education and the Environment
1992 - The Pennsylvania Association for Sustainable Agriculture
? Past memberships in American Physical Society, Society of Physics Students, Sigma Pi Sigma, and the Materials Research Society.

Honors

1986	National Society of Physics Students Scholarship
1987	Class Valedictorian
1995	Hoechst-Celanese award for excellence in Polymer Science
2015	Honorary Lifetime Membership, PA Association for Sustainable Agriculture

Publications:

1. McKenna J, Slawecki TM, Maynard JD. (1990) Second and fourth sound modes for superfluid helium in aerogel. *Physica B: Cond. Matt.*. 165-166(part1): 581-582

2. McKenna J, Slawecki TM, Maynard JD. (1991) Observation of a second-sound-like mode in superfluid-filled Aerogel. *Phys. Rev. Lett*. 66: 1878-1881

3. McKenna J, Slawecki TM, Maynard JD. (1991) Observation of a second-sound-like mode in superfluid-filled Aerogel. *J. Acoust. Soc. Am.* 89: 2007

4. Butler PD, Hamilton WA, Magid LJ, Hayter JB, Slawecki TM, Hammouda B. (1996) Use of complementary neutron scattering techniques in studying the effect of a solid/liquid interface on bulk solution structures. *Faraday Discuss.* 104: 65 – 78

5. Butler PD, Hamilton WA, Magid LJ, Slawecki TM, Han Z, Hayter JB. (1997) Effect of a solid/liquid interface on bulk solution structures under flow. *Physica B: Cond. Matt*. 241-243: 1074-1076.

6. Straty GC, Muzny CD, Butler BD, Lin MY, Slawecki TM, Glinka CJ, Hanley HJM. (1997) An in-situ rheometric shearing apparatus for SANS. *Physica B: Cond. Matt*. 241-243: 74-76.

7. Slawecki TM, Glinka CJ, Hammouda B. (1998) Shear-induced micellar crystal structures in an aqueous triblock copolymer solution. *Phys. Rev. E*. 58: R4048.

8. Karim A, Slawecki TM, Kumar SK, Douglas JF, Satija SK, Han CC, Russell TP, Liu Y, Overney R, Sololov J, Rafailovich MH. (1998) Phase Separation-Induced Surface Patterns in Thin Polymer Blend Films. *Macromolecules* 31(3): 857-862.

9. Ruzette, A-VG, Banerjee P, Mayes AM, Pollard M, Russell TP, Jerome R, Slawecki T, Hjelm R, Thivagaraian P. (1998) Phase Behavior of Diblock Copolymers between Styrene and n-Alkyl Methacrylates. *Macromolecules* 31(24): 8509-8516

10. Edler KJ, Reynolds PA, Brown AS, Slawecki TM, White JW. (1998) Shear and salt effects on the structure of MCM-41 synthesis gels. *J. Chem. Soc., Faraday Trans*. 94:1287-1291

11. Roy R, Hoover MR, Bhalla AS, Slawecki T, Dey S, Cao W, Li J, Bhaskar S. (2007) Ultradilute Ag-aquasols with extraordinary bactericidal properties: the role of the system Ag-O-H2O. *Mat. Res. Innov.* 11: 3-18.

12. Cornwell J, Roy R, Cross LE, Slawecki T, Rao ML. (2009) Surprising observations on phenomena created from modified 2.45 GHz source. *Mat. Res. Innov*. 13(1): 11-14.

13. Zhang, Y., Huang K., Agrawal, D.K., Slawecki, T., Zhu, H., Yang, Y. (2017) Microwave Power System Based on a Combination of Two Magnetrons. *IEEE Trans Electron Dev.* 64(10): 4272-4211.

14. Zhang, Y., Agrawal, D.K., Cheng, J., Slawecki, T, (2018) Microwave Power Absorption Mechanism in Powdered Metals. *IEEE Trans Microwave Theory & Tech*. 66(5): 2107-2115

15. Lai, C., Zhao, C., Li K., Cai, D., Peng, C., Zhang, Y., Yang, Y., Zhu, H., Agrawal, D., Slawecki, T., Wu, L., Zhou, Y., Chen, Q., Zhou, L. and Huang, K. (submitted Feb 2020) No PhaseShifter, Highly Efficient Microwave Power System of Magnetrons Utilizing Frequency-Searching Injection-Locking Technique. *IEEE Trans Microwave Theory & Tech.*

Wes Zimmerman

69 Goat Hill Rd
Boyertown, PA 19512

Work History

Special Agent
Internal Revenue Service
Criminal Investigation Division
August 2016 - present

- Plan and conduct complex investigations relative to criminal violations of federal tax law, as well as other financial crimes and related offenses.
- Implement knowledge of tax laws and accounting principles to analyze voluminous, complex, and often highly sophisticated books and records to find evidence of complex manipulation and/or concealment of the true nature of transactions.
- Distinguish between relevant and irrelevant information to solve highly complex or unusual accounting problems.
- Reconstruct financial records of individuals and conglomerations of separate entities to establish a prima facie criminal case.
- Develop facts in the face of inconsistencies or denials to unwind well planned schemes.
- Analyze information obtained from diversified sources gathered over a wide section of the country to determine the interrelationship of facts and evidence
- Serve as expert in identification and investigation of certain types of abusive/fraudulent tax shelters and provide technical advice to other agents.
- Serve as team leader, guiding and coordinating the efforts of other agents and enforcement personnel.
- Conduct surveillance, undercover operations, execute search and seizure warrants, and arrest warrants.
- Prepare reports to serve as the guide for prosecution recommendations to the US Attorney's Office.
- Testify as a government witness (including an expert witness in the accounting field) and assist the United States' Attorney's Office during trial preparation
- Coordinate actions and investigations with other other federal, state, and local law enforcement agencies in order to assist conducting investigations affecting multiple jurisdictions.
- Apply relevant constitutional and statutory laws and make decisions relating to investigations, Federal Rules of Evidence, and Criminal Procedures in order to investigate complex tax and financial violations.

Revenue Agent and Subject Matter Expert
Internal Revenue Service
Large Business & International Division
March 2009 to August 2016
(Small Business Self Employed Division from October 2005 to March 2009)

- Served as a technical expert in examinations with significant tax compliance issues and provided expert advice that impacted tax compliance on a national scale.
- Drafted and reviewed projects involving emerging issues and areas of non-compliance.
- Serves as an issue expert in the examination of returns of large and international businesses and their related owners.

- Exercised significant authority and responsibility in planning, directing, and coordinating the examination of significant and complex issues.
- Collaborated and coordinated with other experts, revenue agents, counsel attorneys, appeals officers, and specialists throughout IRS to leverage and expand expertise and ensure consistent application and interpretation of tax laws within specified areas.
- Provided feedback, technical expertise, and recommendations to IRS management and IRS Counsel on issues within their defined area of specialized expertise.
- Coordinated or participated in studies such as compliance initiative projects, congressional studies, regulation projects, tax shelters, and emerging issues.
- Made recommendations for changes to the tax law, new tax laws, and the development of formal or informal guidance affecting technical issues.
- Completed analysis of technical issues and results of examinations to provide feedback to improve approaches to risk assessment and workload classification
- Provides advice to examiners, specialists, or counsel attorneys, regarding a defined area of issues and transactions and involving complex cases, significant issues, and emerging areas of high compliance risk.
- Analyzed complex data sets and transactions in order to deconstruct activities or transactions designed to or structured to hide or conceal income such as offshore activities, multiple related entities and other means using a wide range of financial and other investigative skills.
- Worked with sophisticated computerized accounting systems and applied accounting principles, theory, and practices to analyze and interpret accounting books and records to determine their effect on Federal tax liabilities and their adequacy for recording transactions affecting tax liabilities.

Education

Moravian College
Bachelor of Arts – Business Management
May 2003

Villanova University
Certificate of Accountancy
December 2004