

200 Brook Hollow Road  
Mount Pleasant, PA 15666  
March 18, 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

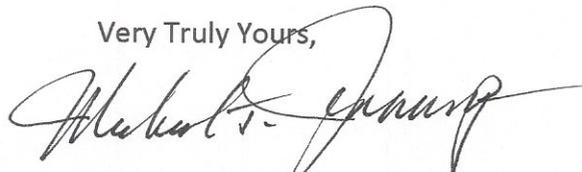
Re: Michael T. Jennings v. West Penn Power Company  
Docket No. C-2018-3006031

Dear Secretary Chiavetta,

Attached please find my **Request for Subpoena** in the above-referenced matter. This document has been served on West Penn Power as shown in the Certificate of Service.

Please contact me if you have any questions.

Very Truly Yours,

A handwritten signature in black ink, appearing to read "Michael T. Jennings", written in a cursive style.

Michael T. Jennings

ssj  
Enclosures

CC: ALJ Watson  
Certificate of Service

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

<b>MICHAEL T. JENNINGS</b>	:	
	:	
<b>v.</b>	:	<b>Docket No. C-2018-3006031</b>
	:	
<b>WEST PENN POWER COMPANY</b>	:	

**REQUEST FOR SUBPOENA**

March 18, 2020

Dear Honorable Judge Watson,

Per our conversation during our Prehearing Conference on Monday, March 16, 2020, I am requesting a subpoena for Christine L. Walker, Senior Vice President and Chief Human Resources Officer for FirstEnergy Company.

I am requesting Ms. Walker to testify as her testimony would be relevant to my case concerning Americans with Disabilities Act (ADA) compliance and related issues on the State and Federal levels. West Penn Power has denied my family accommodations according to the above referenced disability laws. Since Ms. Walker is the "Chief Human Resources Officer" for FirstEnergy, parent corporation of West Penn Power, Ms. Walker can best explain First Energy's position on this matter.

I request that Ms. Walker and FirstEnergy provide documentary evidence which includes company policy manuals covering ADA compliance for its customers, including how ADA compliance is handled for disabled customers who do not want to be exposed to a "smart" meter, and/or who have been advised by their physicians to avoid exposure to a "smart" meter.

I have attached a PUC-291 Subpoena form I obtained from the Pennsylvania Public Utility Commission's website and my portion of information has been completed.

**WHEREFORE**, Complainant, Michael T. Jennings, respectfully requests that the Presiding Administrative Law Judge grant his request for a subpoena for both testimony and documents from Christine L. Walker.

Complainant's Certificate of Service has been filed with the Commission's Secretary, in accordance with Commission Regulations.

Respectfully Submitted,



Michael T. Jennings, Complainant  
200 Brook Hollow Road  
Mount Pleasant, PA 15666  
724-613-4262

[Lilmac2@zoominternet.net](mailto:Lilmac2@zoominternet.net)

Dated: March 18, 2020

ssj

Enclosures

cc: As Per Certificate of Service  
Rosemary Chiavetta, Esq. Public Utility Commission  
Lauren Lepkoski, Tori Giesler, FirstEnergy Service Co



COMMONWEALTH OF PENNSYLVANIA  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

In the Matter of:

Docket No. C-2018-3006031

SUBPOENA

To: Christine L. Walker, FirstEnergy Corp., 76 South Main Street, Akron, OH 44308-1890  
(Name and Address)

Pursuant to the authority of this Commission under §§309, 331(d)(2) and 333(j) of the Public Utility Code:

1. YOU ARE ORDERED by the Commission to come to attend telephonically  
(place)  
\_\_\_\_\_, at \_\_\_\_\_

Pennsylvania, on July 23-24, 2020, at \_\_\_\_\_ o'clock, in the above case, to testify  
(date)  
on behalf of the Complainant and to remain until excused;

2. And bring with you and produce the following: \_\_\_\_\_  
Company policy manuals covering ADA compliance for its customers, including how  
ADA compliance is handled for disabled customers who do not want to be exposed to a  
“smart” meter, and/or who have been advised by their physicians to avoid exposure to a  
“smart” meter.

This subpoena is issued subject to the provisions of 52 Pa. Code §5.421 (with regard to issuance, notice, service and witness fees).

BY THE COMMISSION

Date \_\_\_\_\_

\_\_\_\_\_  
Administrative Law Judge

Commonwealth of Pennsylvania

)

) SS:

Count of

)

**AFFIDAVIT OF SERVICE**

Before me, the undersigned authority, personally appeared \_\_\_\_\_  
who, being duly sworn according to law, deposes and says that he/she served a true and correct  
copy of the within SUBPOENA upon \_\_\_\_\_  
by handing the same to him/her at \_\_\_\_\_ on the  
\_\_\_\_\_ day of \_\_\_\_\_, 20\_\_ at \_\_\_\_\_ a.m./p.m.

\_\_\_\_\_  
(Signature)

Sworn to and subscribed before me  
this \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_

\_\_\_\_\_  
*Notary Public*

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

MICHAEL T. JENNINGS

v.

WEST PENN POWER COMPANY

:  
:  
:  
:  
:

Docket No. C-2018-3006031

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of my **Request for Subpoena** upon the individuals listed below, in accordance with the requirements of 52 Pa. Code Section 1.54 (relating to service by a participant.)

**Service by e-filing and email:**

Lauren Lepkoski  
Tori Giesler  
FirstEnergy Service Company  
2800 Pottsville Pike  
P.O. Box 16001  
Reading, PA 19612-6001  
[llepkoski@firstenergycorp.com](mailto:llepkoski@firstenergycorp.com)  
[tgiesler@firstenergycorp.com](mailto:tgiesler@firstenergycorp.com)

**Service by first-class mail:**

Christine L Walker  
FirstEnergy Corp.  
76 South Main Street  
Akron, OH 44308-1890

**Service by e-filing and first-class mail:**

Administrative Law Judge Jeffrey A. Watson  
Pennsylvania Public Utility Commission  
Piatt Place, Suite 220  
301 5<sup>th</sup> Avenue  
Pittsburgh, PA 15222

Dated: March 18, 2020



Michael T. Jennings  
200 Brook Hollow Road  
Mount Pleasant, PA 15666  
724-613-4262  
Lilmac2@zoominternet.net