

Noreen McCarthy
18 Millstone Lane
Pottstown, PA 19465

Administrative Law Judge Conrad Johnson
Piatt Place
Suite 220
301 5th Avenue
Pittsburgh, PA 15222
Telephone: 412-565-3550

April, 7, 2020

Via EFile

C-2019-3006923 - NOREEN MCCARTHY v. METROPOLITAN EDISON COMPANY

Re: 1) Requesting Continuance of May 5-6, 2020 Hearing Due to Pandemic

2) Americans Disabilities Act Unresolved Request for Accommodations

Dear Judge Johnson:

1) Requesting Continuance Due to Pandemic

I am requesting a continuance of my hearing dates due to the pandemic as per the PUC emergency order of March 20 http://www.puc.state.pa.us/about_puc/covid_19.aspx . Under present conditions it is impossible for me to prepare for my hearing for the following reasons:

- The stay at home order has created chaotic and demanding circumstances in my home because of the quarantine
- My children's school is functioning online which is taking up a large part of my daily schedule of responsibilities as I assist them with their online access and the expectations of their school
- Essential supplies are proving extremely hard to find, and a family of 5 requires me spending large amounts of time trying to locate and purchase these supplies
- My father, who lives out of state is in very poor health, daily phone calls are leading me to the fact that I may have to go help him in his declining health as he is too sick and scared to bring himself to his doctor
- Because of the quarantine and circumstances I cannot get copies made of my exhibits at this time. Even if I could, the PUC says it is not accepting paper mail deliveries
- I currently have unresolved ADA accommodation requests

These are just a few of the reasons I need the 90 day continuance because of the present circumstances.

Even if the quarantine is lifted after April 30th and if my ADA accommodation request is denied or ignored, it will not give me time to copy and submit my exhibits in time for my May 5-6 hearing dates. After careful consideration of my circumstances I believe it is fair, reasonable, and just that I can expect a hearing date during the first week in August 2020, as is allowed by the PA PUC Emergency Order.

2) Americans Disabilities Act Unresolved Request for Accommodations

On November 5, 2019 I sent Judge Watson a confidential letter explaining the need for accommodations. I would appreciate you letting me know if you have that letter. I will list the accommodations without the confidential information. If you don't have a copy of that letter please let me know and I will email to you as to avoid my confidential information to be published on the PUC web site.

I am requesting the PA PUC grant accommodations under the ADA. At this time I am learning new information almost every day that I need to comprehend and follow through in order to protect my rights during this Formal Complaint Process.

The following are the accommodations under the ADA I require in order to protect my rights:

1. Replies to my submissions and questions be sent electronically, and time allowed for me to review and comprehend these and reply. This will require that certain deadlines be extended as necessary to accommodate electronic exchange, as might be the case between two individuals exchanging letters.
2. I will need to electronically submit and receive written testimony and documents/exhibits. Because of auditory processing issues and word retrieval problems I have I am unable to do an oral testimony and cross examination. I will need expert witness testimony to be sent to me electronically so that I can have the time to read, comprehend and prepare any questions for them which is what I believe is when I have a chance to cross examine the witness(es) in writing.
3. I cannot have set deadlines because I have never done this type of writing and processing before, I do not know how much and what kind of text will be presented to me from the utility company, I do not have a legal background, therefore I do not know how long it will take for me to comprehend and respond.

I believe this is a fair and reasonable request. John Chenosky, Docket No. C-2019-3007622 and Charles and Sylvia Bolte, Docket No. C-2019-3011287 asked for and received written testimony per their ADA accommodation.

If my ADA request is denied or ignored I'll have no choice but to participate in the telephone hearing on May 5th and 6th being unprepared which is causing me extreme anxiety. Given the needed time and having this process in writing is the only solution for someone in my circumstance.

I have learned that the PA PUC Administrative Law Judges have great discretionary power. My hope is that you understand my hardship during these unprecedented times and are willing grant me my ADA accommodations and a continuance. Thank you for your consideration of my request.

Sincerely,



Noreen McCarthy
610-469-2009
contactnoreen1@gmail.com

CERTIFICATE OF SERVICE

I certify on this day, April 7, 2020, that I have sent the letter stating Requesting Continuance of May 5-6, 2020 Hearing Due to Pandemic and Americans Disabilities Act Unresolved Request for Accommodations.

Service by email to the persons listed below:

c: Lauren Lepkoski (emailed)
Tori Giesler (emailed)