

Response to Interim Order

Larry R. & Ellen M. Kramer

101 South College Street,
Myerstown, PA 17067
(717) 866-5425

June 5, 2020

VIA EMAIL & US Certified mail

Secretary Rosemary Chiavetta
Pennsylvania Public Utility Commission
P O Box 3265
Harrisburg, PA 17105-3265

& Chief ALJ Charles Rainey
Pennsylvania Public Utility Commission
Office of Administrative Law Judge
P O Box 3265
Harrisburg, PA 17105-3265

In Re: Response to Interim Order of May 26, 2020
Larry R. Kramer & Ellen M. Kramer v. Metropolitan Edison Company
Docket No. C-2017-2630621

Dear Secretary Chiavetta and Chief ALJ Rainey:

In response to an Interim Order issued on May 26, 2020, by ALJ Watson in the above-referenced matter, this serves as a response to that order on behalf of Larry R. and Ellen M. Kramer in our case against Metropolitan Edison Company ("Met-Ed").

In his last Interim Order, ALJ Watson ordered that the parties produce a Status Report, which we did.

1. In our Status Report, we requested that our originally ordered Resolution Conference be ordered to occur which was ordered by Chief ALJ Rainey on or about January 12, 2018.
2. ALJ Watson completely ignored this request again despite an *ex parte* and collusionary email communication between the Cindy Lehman of the Commission and Met-Ed on or about June 1, 2018, where Met-Ed's attorney, Ms. Lepkoski, lied by stating that we were contacted numbers of times but refused to respond. Ms. Lepkoski told Ms. Lehman to move forward with a hearing.

Without checking with us to verify this information, Ms. Lehman seemed to have moved in that direction. Therefore, the Commission appears to trust the word of utilities over Complainants and allowed them *ex parte* influence over the case.

3. ALJ Watson repeatedly and frequently scolded that ALL orders must be followed. In subsequent documents, we requested that the order for the Resolution Conference not be set aside. However, he ignored Chief ALJ Rainey's order for the Resolution Conference and our explanation of the *ex parte* email between the Commission and the utility.
4. We cannot submit exhibits and documents by June 15, 2020, because there is not sufficient time to gather this documentation.
5. We cannot prepare for a hearing by June 29, 2020, because of the following:
 - a. Our documentation has been put away so that it is out of harm's way as our grown children have been going through the house to dispose of their childhood items, taking items to their homes, and donating and selling unwanted items. It will take some time to get access to that documentation after the grown children are done with their current process. Therefore, we do not have access to our "preponderance of evidence" in this case at this time.
 - b. Considerable time has been spent by the Kramers to research the coronavirus in order to determine the actions necessary for the family to take and then implementing those actions. This has taken valuable time from other things.
 - c. Three weeks ago, Mrs. Kramer's mother was admitted to the hospital with a yet undiagnosed problem. Since that time, she has had numbers of tests and two unanticipated and unrelated surgeries. She has gone through some very, very bad times and some better days, but Mrs. Kramer has been designated as the person to notify aunts, uncles, and cousins on both sides of the family about her condition. This has been extremely time consuming and is not yet over. She is still hospitalized and may need rehab once released.

- d. On June 8, 2020, one of our daughters will have a double hip replacement after not walking at all for the past eight (8) months. As her mother, there will be work that Mrs. Kramer needs to do at her home to care for her household.

Therefore, we ask that the Secretary or Judge Rainey that:

6. Met-Ed produce phone records from their telephone provider showing these alleged attempts at contacting us for the ordered Resolution Conference within three (3) days and, if not produced, be found in contempt.
7. Both Met-Ed and the Commission each produce records and documents of all *ex parte* communications between them including but not limited to the aforementioned email.
8. That Met-Ed be held in contempt for ignoring the Order for the Resolution Conference.
9. Due to the misbehavior of Met-Ed the Complainants request this court close this instant case and solve it in favor of the Complainants, and that Met-Ed be ordered to continue to provide the existing meter or another meter exactly the same with no switch-mode power supply as requested as a remedy in the instant complaint. More concisely, an order is requested that Met-Ed be restricted from using a meter with a switch-mode power supply on or for Complainants account or property.
10. If said resolution is not granted Complainants, we ask the court to sanction the attorneys representing Met-Ed for their contempt of this Court.
11. Again, if this matter is not resolved as in 9 above, Complainants request the Resolution Conference ordered by Judge Rainey be scheduled for October, 2020, or after our family's health obligations are resolved.
12. That the Kramers be given sufficient time to get commitments from desired witnesses and their availability for a hearing if a Resolution Conference is not successful.
13. That sufficient time be granted to gather appropriate documentation for submission prior to said possible hearing.

14. That we be assigned another ALJ for our case as ALJ Watson does not seem to be reading any of our submitted documentation, and he is unable to process our documentation in a timely fashion.

Respectfully,

Larry R. Kramer

Ellen M. Kramer

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Larry R. Kramer and :
Ellen M. Kramer :
v. : Docket No. C-2017-2630621
Metropolitan Edison Company :

Certificate of Service

We hereby certify that we have this day served a true copy of the response to Judge Watson's Interim Order of May 26, 2020, upon the individuals listed below, in accordance with the requirements of 52 Pa. Code § 1.54.

Service by email, and US Certified mail, postage prepaid, as follows:

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

and filed with:
ALJ Jeffrey A. Watson
Pennsylvania Public Utility Commission
Office of Administrative Law Judge
Piatt Place, Suite 220
301 Fifth Avenue
Pittsburgh, PA 15222

Dated: June 5, 2020

Larry R. Kramer

Ellen M. Kramer

101 South College Street
Myerstown, PA 17067
(717) 866-5425
kramer501@comcast.net
kramer101@comcast.net