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July 1, 2020

VIA ELECTRONIC FILING

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor
P.O. Box 3265
Harrisburg, PA 17105-3265

Re: John and Janet Holder & June Maculesky v. PPL Electric Utilities Corporation
Docket No. F-2019-3008809 and F-2019-3008832

Dear Secretary Chiavetta:

Enclosed for filing is the Answer of PPL Electric Utilities Corporation to the Untimely Motion To Compel of John and Janet Holder and June Maculesky in the above-referenced proceeding. Copies will be provided as indicated on the Certificate of Service.

Sincerely,

Garrett P. Lent

GPL/dmc
Enclosures

cc: Honorable Elizabeth Barnes (*w/enclosures*)
Certificate of Service

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been served upon the following persons, in the manner indicated, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

VIA ELECTRONIC MAIL

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Date: July 1, 2020



Garrett P. Lent

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

John and Janet Holder and June Maculesky,	:	
	:	
	:	
Complainants,	:	
	:	Docket No. F-2019-3008809
v.	:	Docket No. F-2019-3008832
	:	
PPL Electric Utilities Corporation,	:	
	:	
Respondent.	:	

**ANSWER OF PPL ELECTRIC UTILITIES CORPORATION
TO THE UNTIMELY MOTION TO COMPEL OF
JOHN AND JANET HOLDER AND JUNE MACULESKY**

TO THE HONORABLE ADMINISTRATIVE LAW JUDGE ELIZABETH H. BARNES:

Pursuant to Section 5.432(g)(1) of the Pennsylvania Public Utility Commission’s (“Commission”) regulations, 52 Pa. Code § 5.432(g)(1), PPL Electric Utilities Corporation (“PPL Electric” or the “Company”) files this Answer to the Second Amended Motion to Compel Responses to Set III Interrogatories and Requests for Production of Documents (“Motion to Compel”) filed by John and Janet Holder and June Maculesky (“Complainants”) on June 29, 2020.¹ The Complainants’ latest submission is untimely on its face and fails to demonstrate that any of PPL Electric’s objections to the Complainants’ Set III Interrogatories and Requests for Production of Documents (“Complainants Set III Discovery”) should be dismissed. Rather, the instant Motion to Compel is the latest improper submission by the Complainants, which

¹ Although the Complainants initially served a Motion to Compel Responses to Set III Interrogatories and Requests for Production of Documents on Friday, June 26, 2020 at approximately 4:24 p.m., the Complainants subsequently served an Amended Motion to Compel Responses to Set III Interrogatories and Requests for Production of Documents on Friday, June 26, 2020 at approximately 10:49 p.m., and a Second Amended Motion to Compel Responses to Set III Interrogatories and Requests for Production of Documents on Saturday, June 27, 2020, at approximately 8:23 p.m. (*i.e.*, the instant Motion to Compel). As such, the Motion to Compel is deemed to have been filed and served on Monday, June 29, 2020. The Complainants once again re-filed the Motion to Compel on June 30, 2020.

evidences their continued effort to prosecute the above-captioned Formal Complaints in bad faith.

In support thereof, PPL Electric submits as follows:

I. BACKGROUND

1. On March 16, 2020, the Complainants served the Complainants' Set III Discovery, which consists of 185 interrogatories and requests for production of documents. A true and correct copy of the Complainants' Set III Discovery is attached hereto as **Appendix A**.

2. On March 24, 2020, PPL Electric filed a letter requesting an extension of 30 days to the deadlines for serving objections and answers to the Complainants Set III Discovery. PPL Electric's request was granted via e-mail by the Administrative Law Judge Elizabeth J. Barnes (the "ALJ") on March 25, 2020, due to the impacts of the COVID-19 pandemic on the Commission's operations. A true and correct copy of the e-mail granting PPL Electric's requested extension is attached hereto as **Appendix B**.

3. On April 27, 2020, PPL Electric served its Objections to the Complainants Set III Discovery requests ("Objections"). A true and correct copy of PPL Electric's Objections is attached hereto as **Appendix C**.

4. As such, under the Commission's regulations, any motion to dismiss PPL Electric's Objections and compel response to the Complainants' Set III Discovery was due on or before May 7, 2020. 52 Pa. Code § 5.432(g).

5. The Complainants served the instant Motion to Compel on June 29, 2020, *i.e.* 57 days after May 7, 2020. PPL Electric notes that, as explained in footnote 1, *supra*, the Complainants filed multiple versions of the motion between June 26-30, which required the Company to review and consider multiple, slightly different versions of the same untimely and meritless motion. In addition, the Complainants' Motion to Compel includes neither a copy of

the Complainants' Set III Discovery nor PPL Electric's Objections.

II. ANSWER TO THE MOTION TO COMPEL

A. THE MOTION TO COMPEL IS UNTIMELY AND PROCEDURALLY IMPROPER.

6. Under Section 5.432(g) of the Commission's regulations, "Within 10 days of service of an objection to interrogatories, the party submitting the interrogatories may file a motion requesting the presiding officer to dismiss an objection and compel that the interrogatory be answered." 52 Pa. Code § 5.432(g). Furthermore, "[i]f a motion to compel is not filed within 10 days of service of the objection, the objected to interrogatory will be deemed withdrawn." *Id.*

7. Here, PPL Electric served its Objections to the Complainants' Set III Discovery on April 27, 2020. In its Objections, PPL Electric objected to all of the Complainants' Set III Discovery Requests.

8. The Complainants' Motion to Compel was served on June 29, 2020, *i.e.* 57 days after May 7, 2020. Under Section 5.432(g), the Motion to Compel is untimely by 47 days. As the Complainants failed to file the Motion to Compel "within 10 days of service" of PPL Electric's Objections, the objected to interrogatories—*i.e.*, all of the requests included in the Complainants' Set III Discovery Requests—are "deemed withdrawn" under Section 5.432(g) of the Commission's regulations. As the Complainants' Set III Discovery Requests are deemed withdrawn, there are no pending interrogatories to which a response can be compelled and, therefore, the Complainants' Motion to Compel should be denied.

9. Section 5.432(g) also requests that "[t]he motion to compel must include the interrogatory objected to and the objection." *Id.*

10. The Complainants' Motion to Compel contains neither the Complainants' Set III Discovery Requests nor PPL Electric's objections and, therefore, does not comply with the

Commission's regulations.

11. Furthermore, it should be noted that the Complainants' Motion to Compel appears to be another attempted end-run around the Order Granting PPL Electric Utilities Corporation's Motion in Limine and Motion for Sanctions issued by the ALJ on May 26, 2020 ("Order Granting Sanctions") and the subsequent Order Denying the Complainants' Exceptions dated June 23, 2020 ("Order Denying Exceptions"), which affirmed the adverse inference sanction granted in the Order Granting Sanctions. The Complainants make clear the intent of the Motion to Compel by stating:

28. Given the Respondent's complete failure to provide answers and to identify or produce any supportive documents requested by Complainants' Interrogatories I-1 through I-162, the propositions clearly and unambiguously stated in those Interrogatories remain, by the Respondent's choice, unasserted and thus un-affirmed.

29. Respondent's refusal to answer, that is, to either affirm or deny the propositions stated in Complainants' Interrogatories Set III, numbers I-1 through I-162, **establishes as FACT** that the Respondent has NOT asserted or claimed, and does NOT assert or claim, that there is a reliable medical and scientific basis upon which to conclude that exposure to radiofrequency radiation and RF fields, as a result of PPL Electric's installation of AMI wireless smart meters, would not, will not, could not and cannot cause, exacerbate, or contribute to biological or adverse health effects

Motion to Compel ¶¶ 28-29.

12. Essentially, the Complainants' seek to undo the ALJ's sanction that found and concluded "the Complainants have not and will not experience any medical conditions or issues from the installation of PPL Electric's AMI meter" (Order Granting Sanctions, p. 2) by improperly obtaining a contrary adverse inference against PPL Electric.

13. Not only is the Complainants' request for an adverse inference procedurally improper—and the Motion to Compel meritless for the reasons explained herein—it is without substance. Under Section 332(a) of the Public Utility Code, the Complainants maintain the

burden of proof in this proceeding.² PPL Electric, as the respondent in this proceeding does not have the burden of proof. Therefore, PPL Electric need not present any evidence to prove “there is a reliable medical and scientific basis upon which to conclude that exposure to radiofrequency radiation and RF fields, as a result of PPL Electric’s installation of AMI wireless smart meters, would not, will not, could not and cannot cause, exacerbate, or contribute to biological or adverse health effects;” the Complainants, however, as the parties bearing the burden of proof, are required for each of their health claims to establish that installation of the AMI meter would constitute unsafe or unreasonable service in violation of Section 1501 of the Public Utility Code.³ As such, even if the Complainants could demonstrate they were entitled to the inference sought in paragraph 28-29 of the Motion to Compel, which they have not done, such an inference would not satisfy their burden to prove their claims in this proceeding.

14. For these reasons, the instant Motion to Compel is untimely and procedurally improper and should be denied.

B. THE MOTION TO COMPEL IS WITHOUT MERIT

15. Notwithstanding the untimeliness and procedural impropriety of the Motion to Compel, PPL Electric further submits that the Motion to Compel is without merit. The Complainants’ Motion to Compel fails to specifically address each of PPL Electric’s Objections, which are incorporated herein by reference. As such, and for the reasons explained below, the Motion to Compel should be denied.

16. The Complainants first raise several “Preliminary Notes” that withdraw Complainants’ Interrogatories numbered I-118 through I-120 and I-157 through I-159 as being

² 66 Pa.C.S. § 332(a); *Samuel J. Lansberry, Inc. v. Pa. Pub. Util. Comm’n*, 578 A.2d 600 (Pa. Commw. 1990), alloc. den., 602 A.2d 863 (Pa. 1992).

³ *Frompovich v. PECO Energy Co.*, 2018 Pa. PUC LEXIS 160 (Opinion and Order entered May 3, 2018); *Susan Kreider v. PECO Energy Co.*, Docket No. C-2015-2469655 (Order on Reconsideration entered January 28, 2016)

duplicative of other requests, and withdraw Complainants' Interrogatories numbered I-180 through I-185. *See* Motion to Compel, PN-1 through PN-3. Although PPL Electric recognizes and appreciates the Complainants' attempts to narrow the scope and number of requests that are in dispute, all of the Complainants' Set III Discovery Requests have already been deemed withdrawn under Section 5.432(g) of the Commission's regulations. *See* Section II.A. *supra*.

17. The Complainants next assert that PPL Electric's Objections are "blanket" and "boilerplate" and insinuates that no extension was needed to provide the Objections. *See* Motion to Compel ¶¶ 3-6. The Motion to Compel misrepresents the level of detail provided in PPL Electric's Objections, which are attached hereto and speak for themselves. Moreover, to the extent that PPL Electric's Objections appear repetitive, this is due to the repetitive nature of the Complainants' Set III Discovery requests, which was specifically highlighted in PPL Electric's Objection that the Complainants' Set III Discovery was sought in bad faith. *See* **Appendix C** ¶¶ 1-15.

18. As noted in PPL Electric's Objections, the Commission has recognized that a complainant acts in bad faith where they take actions that are designed to intentionally and unduly delay the proceeding. *See Berman v. Bell Telephone Company of Pennsylvania*, Docket No. C-00923784, 1992 Pa. PUC LEXIS 73 (Initial Decision dated June 19, 1992).

19. The Complainants have not even attempted to respond to PPL Electric's objection to the Complainants' Set III Discovery Request as being sought in bad faith and being sought to unreasonably annoy and harass PPL Electric and its witnesses. Specifically, the timing of the Complainants' Set III Discovery Requests, the number of requests, and the subject matter of the requests evidence bad faith and an attempt to abuse the discovery process to harass and annoy PPL Electric and its witnesses. *See* **Appendix C** ¶¶ 1-15. On this ground alone, the Motion to

Compel should be denied.

20. The Complainants next argue that “[w]hether or not some of the requests in Complainants’ Set III essentially seek the same information that was requested in their [prior discovery]...the Respondent has nonetheless failed to answer any of the Complainants’ discovery requests...” Motion to Compel ¶ 8.

21. However, this argument ignores the Commission’s regulations which prohibit discovery which is sought in bad faith or would cause unreasonable annoyance, burden or expense to the deponent. *See* 52 Pa. Code § 5.361(a). PPL Electric fully explained in its Objections why the repetitive and duplicative nature of the Complainants’ Set III Discovery demonstrates these requests are prohibited as being sought in bad faith or would cause unreasonable annoyance, burden or expense. *See generally* **Appendix C**. Moreover, the Complainants cite no regulation nor Commission order which entitles them to continually re-ask the same questions that have repeatedly been asked and answered by PPL Electric.

22. Complainants argue that the Set III Discovery Requests “have spelled out in parsed language each and every interrogatory request in Set III such that each request has a clear, distinct and readily understood meaning.” Motion to Compel ¶ 9. The Complainants further argue that PPL Electric’s objections based upon the repetitive and duplicative nature of the requests and the Complainants’ use of complicated compound phrases and sentences, as well as vague and undefined terms, constitute “a ‘splitting hairs’ game of semantics” (*see* Motion to Compel ¶¶ 10-15) and Complainants attempt to address their lack of clarity by explaining the “form” of each question (*see* Motion to Compel ¶¶ 16-18). In addition, the Complainants assert that their requests are “straightforward, direct, clear and unambiguous.” Motion to Compel ¶ 15. Finally, the Complainants assert that the interrogatories only request “identification of empirical

research and production of evidentiary documents that might have supported” PPL Electric’s answers to other requests. Motion to Compel ¶ 19. These arguments should be denied.

23. PPL Electric has already fully explained its position in this case and provided the information sought by these requests, which is the very same information that was sought by the Complainants’ Set II Discovery Requests. As repeatedly explained in PPL Electric’s Objections:

These interrogatories are repetitive of prior requests to which PPL Electric has provided responses. For example, PPL Electric objected and responded without waiving its objection to prior discovery requests seeking the bases for the opinions of its expert witnesses. *See, e.g.*, PPL Electric Responses to Holder-II-1 through Holder-II-4. Therein, PPL Electric stated it would provide this information in the written direct testimony of its expert witnesses, in accordance with the litigation schedule established in this case. PPL Electric served written direct testimony on February 28, 2020, and its direct testimony sets forth its position and the scientific and medical opinions of its expert witnesses...[these requests] simply ask for information that is already in the Complainants’ possession.

See, e.g., **Appendix C** ¶ 25. The Complainants have failed to demonstrate in their Motion to Compel that PPL Electric’s direct testimony does not already provide the Complainants with the information they sought and, indeed, do not even cite or reference the testimony served by PPL Electric.

24. As further explained in PPL Electric’s Objections, the Complainants’ Set III Discovery Requests are replete with both “vague and undefined terms” and “complicated compound phrases and sentences, which make responding to the discovery requests unreasonably difficult.” *See, e.g.*, **Appendix C** ¶¶ 26-27. The Complainants’ conclusory statements to the contrary, fail to remedy the problems with the form of each objected to request and the undefined nature of specifically identified phrases and terms used in the requests.

25. With specific respect to PPL Electric’s objections to the use of vague and undefined terms, it is important to note that PPL Electric repeatedly stated, “Without clarification

as to the meaning of these terms, PPL Electric cannot reasonably provide a complete and accurate response.” *See, e.g.*, **Appendix C ¶ 26** (emphasis added). The Complainants could have contacted PPL Electric’s counsel to clarify the definitions and meanings of these terms as the Complainants’ used them in the Set III Discovery Requests. Their failure to clarify any of the identified terms and phrases further demonstrates that their arguments should be denied.

26. Moreover, and importantly, none of the Complainants is qualified to provide expert testimony and the Complainants have not identified an expert witness in this proceeding. PPL Electric, on the other hand, has identified and submitted the testimony of two experts in this proceeding. Terms such as “chronic, long-term exposure,” “levels below,” “levels far below,” “pulsed wave transmissions,” “causal mechanisms of interaction,” “day and night transmission,” and “relative locations or distances,” among others, which may have specific definitions and understandings within the scientific community that differ from a lay understanding of these terms. Without specific definitions or explanations of the meaning of such identified terms and phrases *as they are being used by the Complainants*, PPL Electric cannot reasonably provide a complete and accurate response to the Complainants’ requests.

27. The Complainants next raise specific arguments in response to PPL Electric’s Objections to the interrogatory numbered I-164. Motion to Compel ¶¶ 20-22. They assert that this information is relevant to “Cause of Action II of their Amended Complaint, that the Commission’s policy of mandating the installation of smart meters would force the Complainants’ properties to be used by PPL with its AMI meters for purposes other than the collection of the Complainants’ electricity usage data.” Motion to Compel ¶ 22.

28. However, this request does not seek relevant information and is not reasonably calculated to lead to the discovery of admissible evidence. As explained in PPL Electric’s

Objections:

PPL Electric's existing easements and/or property rights at either of the Complainants' properties are not at issue. Moreover, this information is not relevant to any claim that is within the Commission's jurisdiction to consider; the Commission has repeatedly held that it lacks jurisdiction to interpret easements or otherwise resolve disputes regarding property rights.

Appendix C ¶ 138.

29. As a "creature of statute," the Commission "has only those powers which are expressly conferred upon it by the Legislature and those powers which arise by necessary implication." *Feingold v. Bell of Pa.*, 383 A.2d 791, 794 (Pa. 1977) (citing *Allegheny Cnty. Port Auth. v. Pa. PUC*, 237 A.2d 602 (Pa. 1967); *Del. River Port Auth. v. Pa. PUC*, 145 A.2d 172 (Pa. 1958)). The Commission is without jurisdiction over other real property issues such as trespass and the location of utility facilities pursuant to valid easements. See *Shedlosky v. Pennsylvania Electric Co.*, Docket No. C-20066937 (Order entered May 28, 2008); see also *Anne E. Perrige v. Metropolitan Edison Co.*, Docket No. C-00004110 (Order entered July 11, 2003) (Commission had no jurisdiction to interpret the meaning of a written right-of-way agreement); *Samuel Messina v. Bell Atlantic-Pennsylvania, Inc.*, Docket No. C-00968225 (Order entered Sept. 23, 1998) ("The Commission has clearly stated in prior decisions that it is without subject matter jurisdiction to adjudicate questions involving trespass and whether or not utility facilities are located pursuant to valid easements or rights-of-way." (citation omitted)). Therefore, the Complainants' Motion to Compel a response to I-164 should be denied.

30. The Complainants' next specifically argue that PPL Electric's objections to interrogatories numbers I-165 through I-168 should be dismissed and PPL Electric should be compelled to respond to these requests. Motion to Compel ¶¶ 23-24. PPL Electric objected to I-165 through I-168 on the basis that these requests seek legal opinions.

31. Contrary to the Complainants' arguments, the Commission's regulations exempt the "conclusions, opinions, memoranda, notes, summaries, legal research or legal theories." 52 Pa. Code § 5.323(a). Each of these requests seek citations to "any law, statute, official rule, or right of easement" that would allow PPL Electric to install an AMI meter on the Complainants' residence or otherwise access their property. PPL Electric is not required to disclose its legal research or legal theories regarding its claims or defenses in this case in discovery. Therefore, the Complainants' Motion to Compel responses to I-165 through I-168 should be dismissed.

32. Finally, the Complainants seek to compel a response to I-176. Motion to Compel ¶ 25. As explained in PPL Electric's objections, subpart (3) of this interrogatory improperly seeks legal opinions, including on the Company's compliance with the Commission's regulations and laws applicable to the collection and protection of customer information. The Company's witnesses are not lawyers who can provide legal opinions. Further, discovery is intended for the discovery of facts and evidence that may be presented at the evidentiary hearing, not the legal opinions of the Company's attorneys that are protected by attorney-client privilege and the attorney work product doctrine. Rather, PPL Electric's legal arguments will be set forth in its closing argument and its briefs, if any, that are submitted in this proceeding.

33. Subpart (4) of this interrogatory is also objectionable because it uses a number of vague and undefined terms and phrases, such as "burden of responsibility," "necessary event log monitoring," "unauthorized access," and "customer data." Without clarification as to the meaning of these terms, PPL Electric cannot reasonably provide a complete and accurate response.

34. And, furthermore, subpart (5) of the request seeks information that is not within PPL Electric's possession. Specifically, this part of the question seeks information regarding

methods that third parties may use to disaggregate and de-anonymize collected data and how such third parties would be able to use the data if they were to not be able to identify the customers associated with the data. This part of the question specifically asks about the capabilities and actions of third parties, and not PPL Electric. Therefore, it seeks information not within PPL Electric's possession or control.

35. The Complainants do not address any of the Company's specific objections to this request. Therefore, the Motion to Compel should be denied.

III. CONCLUSION

WHEREFORE, PPL Electric Utilities Corporation respectfully requests that the Complainants' Set III Interrogatories and Requests for Production of Documents be deemed withdrawn for failure to timely move to compel or, in the alternative, that the Second Amended Motion to Compel Responses to Set III Interrogatories and Requests for Production of Documents of John and Janet Holder and June Maculesky be denied in its entirety.

Respectfully submitted,



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Date: July 1, 2020

Attorneys for PPL Electric Utilities Corporation

APPENDIX A

**INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS
PROPOUNDED BY COMPLAINANTS ON PPL ELECTRIC UTILITIES CORPORATION
— SET III**

Pursuant to 66 Pa.C.S. § 333 and 52 Pa. Code §§ 5.341 et seq., Complainants propound the following Interrogatories and Requests for Production of Documents on PPL Electric Utilities Corporation (“Respondent”) — Set III.

Please provide direct, concise, full and complete answers to this discovery request within twenty (20) days of the date of service, pursuant to 52 Pa. Code § 5.342.

Complainants to PPL:

I-1. In support of PPL's position in the instant case, do PPL and/or the company's expert witnesses assert or make the claim that there is a reliable medical and scientific basis upon which to conclude that exposure to radiofrequency (RF) radiation produced as a result of the installation of PPL's automated metering infrastructure ("AMI") meters **would not and will not** cause biological or adverse health effects?

I-2. If PPL's answer to I-1 is in the affirmative, please identify specifically all empirical evidence in the form of actual medical and scientific research studies upon which PPL and the company's expert witnesses rely and will rely in support of such a claim.

I-3. If PPL's answer to I-1 is in the affirmative, please produce and provide Complainants with copies of all empirical medical and scientific documentation which PPL and the company's expert witnesses rely and will rely upon as evidence in support of such a claim.

I-4. In support of PPL's position in the instant case, do PPL and/or the company's expert witnesses assert or make the claim that there is a reliable medical and scientific basis upon which to conclude that exposure to radiofrequency (RF) radiation produced as a result of the installation of PPL's automated metering infrastructure ("AMI") meters **could not and cannot** cause biological or adverse health effects?

I-5. If PPL's answer to I-4 is in the affirmative, please identify specifically all empirical evidence in the form of actual medical and scientific research studies upon which PPL and the company's expert witnesses rely and will rely in support of such a claim.

I-6. If PPL's answer to I-4 is in the affirmative, please produce and provide Complainants with copies of all empirical medical and scientific documentation which PPL and the company's expert witnesses rely and will rely upon as evidence in support of such a claim.

I-7. In support of PPL's position in the instant case, do PPL and/or the company's expert witnesses assert or make the claim that there is a reliable medical and scientific basis upon which to conclude that exposure to radiofrequency (RF) radiation produced as a result of the installation of PPL's automated metering infrastructure ("AMI") meters **would not and will not** contribute to biological or adverse health effects?

I-8. If PPL's answer to I-7 is in the affirmative, please identify specifically all empirical evidence in the form of actual medical and scientific research studies upon which PPL and the company's expert witnesses rely and will rely in support of such a claim.

I-9. If PPL's answer to I-7 is in the affirmative, please produce and provide Complainants with copies of all empirical medical and scientific documentation which PPL and the company's expert witnesses rely and will rely upon as evidence in support of such a claim.

I-10. In support of PPL's position in the instant case, do PPL and/or the company's expert witnesses assert or make the claim that there is a reliable medical and scientific basis upon which to conclude that exposure to radiofrequency (RF) radiation produced as a result of the installation of PPL's automated metering infrastructure ("AMI") meters **could not and cannot** contribute to biological or adverse health effects?

I-11. If PPL's answer to I-10 is in the affirmative, please identify specifically all empirical evidence in the form of actual medical and scientific research studies upon which PPL and the company's expert witnesses rely and will rely in support of such a claim.

I-12. If PPL's answer to I-10 is in the affirmative, please produce and provide Complainants with copies of all empirical medical and scientific documentation which PPL and the company's expert witnesses rely and will rely upon as evidence in support of such a claim.

I-13. In support of PPL's position in the instant case, do PPL and/or the company's expert witnesses assert or make the claim that there is a reliable medical and scientific basis upon which to conclude that exposure to radiofrequency (RF) radiation produced as a result of the installation of PPL's automated metering infrastructure ("AMI") meters **would not and will not** exacerbate adverse health effects?

I-14. If PPL's answer to I-13 is in the affirmative, please identify specifically all empirical evidence in the form of actual medical and scientific research studies upon which PPL and the company's expert witnesses rely and will rely in support of such a claim.

I-15. If PPL's answer to I-13 is in the affirmative, please produce and provide Complainants with copies of all empirical medical and scientific documentation which PPL and the company's expert witnesses rely and will rely upon as evidence in support of such a claim.

I-16. In support of PPL's position in the instant case, do PPL and/or the company's expert witnesses assert or make the claim that there is a reliable medical and scientific basis upon which to conclude that exposure to radiofrequency (RF) radiation produced as a result of the installation of PPL's automated metering infrastructure ("AMI") meters **could not and cannot** exacerbate adverse health effects?

I-17. If PPL's answer to I-16 is in the affirmative, please identify specifically all empirical evidence in the form of actual medical and scientific research studies upon which PPL and the company's expert witnesses rely and will rely in support of such a claim.

I-18. If PPL's answer to I-16 is in the affirmative, please produce and provide Complainants with copies of all empirical medical and scientific documentation which PPL and the company's expert witnesses rely and will rely upon as evidence in support of such a claim.

(Note: To be clear, *continual* exposure means *repeated* exposure. The term does not necessarily mean *continuous* exposure. Also, *day-and-night* transmission does not necessarily mean continuous transmission.)

I-19. In support of PPL's position in the instant case, do PPL and/or the company's expert witnesses assert or make the claim that there is a reliable medical and scientific basis upon which to conclude that chronic, long-term exposure to frequent, day-and-night transmissions of radiofrequency (RF) radiation produced as a result of the installation of PPL's automated metering infrastructure ("AMI") meters **would not and will not** cause biological or adverse health effects?

I-20. If PPL's answer to I-19 is in the affirmative, please identify specifically all empirical evidence in the form of actual medical and scientific research studies upon which PPL and the company's expert witnesses rely and will rely in support of such a claim.

I-21. If PPL's answer to I-19 is in the affirmative, please produce and provide Complainants with copies of all empirical medical and scientific documentation which PPL and the company's expert witnesses rely and will rely upon as evidence in support of such a claim.

I-22. In support of PPL's position in the instant case, do PPL and/or the company's expert witnesses assert or make the claim that there is a reliable medical and scientific basis upon which to conclude that chronic, long-term exposure to frequent, day-and-night transmissions of radiofrequency (RF) radiation produced as a result of the installation of PPL's automated metering infrastructure ("AMI") meters **could not and cannot** cause biological or adverse health effects?

I-23. If PPL's answer to I-22 is in the affirmative, please identify specifically all empirical evidence in the form of actual medical and scientific research studies upon which PPL and the company's expert witnesses rely and will rely in support of such a claim.

I-24. If PPL's answer to I-22 is in the affirmative, please produce and provide Complainants with copies of all empirical medical and scientific documentation which PPL and the company's expert witnesses rely and will rely upon as evidence in support of such a claim.

I-25. In support of PPL's position in the instant case, do PPL and/or the company's expert witnesses assert or make the claim that there is a reliable medical and scientific basis upon which to conclude that chronic, long-term exposure to frequent, day-and-night transmissions of radiofrequency (RF) radiation produced as a result of the installation of PPL's automated metering infrastructure ("AMI") meters **would not and will not** contribute to biological or adverse health effects?

I-26. If PPL's answer to I-25 is in the affirmative, please identify specifically all empirical evidence in the form of actual medical and scientific research studies upon which PPL and the company's expert witnesses rely and will rely in support of such a claim.

I-27. If PPL's answer to I-25 is in the affirmative, please produce and provide Complainants with copies of all empirical medical and scientific documentation which PPL and the company's expert witnesses rely and will rely upon as evidence in support of such a claim.

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I-29. If PPL's answer to I-28 is in the affirmative, please identify specifically all empirical evidence in the form of actual medical and scientific research studies upon which PPL and the company's expert witnesses rely and will rely in support of such a claim.

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I-32. If PPL's answer to I-31 is in the affirmative, please identify specifically all empirical evidence in the form of actual medical and scientific research studies upon which PPL and the company's expert witnesses rely and will rely in support of such a claim.

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I-35. If PPL's answer to I-34 is in the affirmative, please identify specifically all empirical evidence in the form of actual medical and scientific research studies upon which PPL and the company's expert witnesses rely and will rely in support of such a claim.

I-36. If PPL's answer to I-34 is in the affirmative, please produce and provide Complainants with copies of all empirical medical and scientific documentation which PPL and the company's expert witnesses rely and will rely upon as evidence in support of such a claim.

I-37. In support of PPL's position in the instant case, do PPL and/or the company's expert witnesses assert or make the claim that there is a reliable medical and scientific basis upon which to conclude that exposure to radiofrequency radiation at levels below the FCC RF safety guidelines as a result of the installation of PPL's AMI meters **would not and will not** cause biological or adverse health effects?

I-38. If PPL's answer to I-37 is in the affirmative, please identify specifically all empirical evidence in the form of actual medical and scientific research studies upon which PPL and the company's expert witnesses rely and will rely in support of such a claim.

I-39. If PPL's answer to I-37 is in the affirmative, please produce and provide Complainants with copies of all empirical medical and scientific documentation which PPL and the company's expert witnesses rely and will rely upon as evidence in support of such a claim.

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I-41. If PPL's answer to I-40 is in the affirmative, please identify specifically all empirical evidence in the form of actual medical and scientific research studies upon which PPL and the company's expert witnesses rely and will rely in support of such a claim.

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I-47. If PPL's answer to I-46 is in the affirmative, please identify specifically all empirical evidence in the form of actual medical and scientific research studies upon which PPL and the company's expert witnesses rely and will rely in support of such a claim.

I-48. If PPL's answer to I-46 is in the affirmative, please produce and provide Complainants with copies of all empirical medical and scientific documentation which PPL and the company's expert witnesses rely and will rely upon as evidence in support of such a claim.

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I-53. If PPL's answer to I-52 is in the affirmative, please identify specifically all empirical evidence in the form of actual medical and scientific research studies upon which PPL and the company's expert witnesses rely and will rely in support of such a claim.

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I-55. In support of PPL's position in the instant case, do PPL and/or the company's expert witnesses assert or make the claim that there is a reliable medical and scientific basis upon which to conclude that chronic, long-term exposure to frequent, day-and-night transmissions of radiofrequency radiation at levels below the FCC RF safety guidelines as a result of the installation of PPL's AMI meters **would not and will not** cause biological or adverse health effects?

I-56. If PPL's answer to I-55 is in the affirmative, please identify specifically all empirical evidence in the form of actual medical and scientific research studies upon which PPL and the company's expert witnesses rely and will rely in support of such a claim.

I-57. If PPL's answer to I-55 is in the affirmative, please produce and provide Complainants with copies of all empirical medical and scientific documentation which PPL and the company's expert witnesses rely and will rely upon as evidence in support of such a claim.

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I-59. If PPL's answer to I-58 is in the affirmative, please identify specifically all empirical evidence in the form of actual medical and scientific research studies upon which PPL and the company's expert witnesses rely and will rely in support of such a claim.

I-60. If PPL's answer to I-58 is in the affirmative, please produce and provide Complainants with copies of all empirical medical and scientific documentation which PPL and the company's expert witnesses rely and will rely upon as evidence in support of such a claim.

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I-62. If PPL's answer to I-61 is in the affirmative, please identify specifically all empirical evidence in the form of actual medical and scientific research studies upon which PPL and the company's expert witnesses rely and will rely in support of such a claim.

I-63. If PPL's answer to I-61 is in the affirmative, please produce and provide Complainants with copies of all empirical medical and scientific documentation which PPL and the company's expert witnesses rely and will rely upon as evidence in support of such a claim.

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I-65. If PPL's answer to I-64 is in the affirmative, please identify specifically all empirical evidence in the form of actual medical and scientific research studies upon which PPL and the company's expert witnesses rely and will rely in support of such a claim.

I-66. If PPL's answer to I-64 is in the affirmative, please produce and provide Complainants with copies of all empirical medical and scientific documentation which PPL and the company's expert witnesses rely and will rely upon as evidence in support of such a claim.

I-67. In support of PPL's position in the instant case, do PPL and/or the company's expert witnesses assert or make the claim that there is a reliable medical and scientific basis upon which to conclude that chronic, long-term exposure to frequent, day-and-night transmissions of radiofrequency radiation at levels below the FCC RF safety guidelines as a result of the installation of PPL's AMI meters **would not and will not** exacerbate adverse health effects?

I-68. If PPL's answer to I-67 is in the affirmative, please identify specifically all empirical evidence in the form of actual medical and scientific research studies upon which PPL and the company's expert witnesses rely and will rely in support of such a claim.

I-69. If PPL's answer to I-67 is in the affirmative, please produce and provide Complainants with copies of all empirical medical and scientific documentation which PPL and the company's expert witnesses rely and will rely upon as evidence in support of such a claim.

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I-71. If PPL's answer to I-70 is in the affirmative, please identify specifically all empirical evidence in the form of actual medical and scientific research studies upon which PPL and the company's expert witnesses rely and will rely in support of such a claim.

I-72. If PPL's answer to I-70 is in the affirmative, please produce and provide Complainants with copies of all empirical medical and scientific documentation which PPL and the company's expert witnesses rely and will rely upon as evidence in support of such a claim.

I-73. In support of PPL's position in the instant case, do PPL and/or the company's expert witnesses assert or make the claim that there is a reliable medical and scientific basis upon which to conclude that chronic, long-term exposure to frequent, day-and-night transmissions of radiofrequency radiation at very low levels (far below the FCC RF safety guidelines) as a result of the installation of PPL's AMI meters **would not and will not** cause biological or adverse health effects?

I-74. If PPL's answer to I-73 is in the affirmative, please identify specifically all empirical evidence in the form of actual medical and scientific research studies upon which PPL and the company's expert witnesses rely and will rely in support of such a claim.

I-75. If PPL's answer to I-73 is in the affirmative, please produce and provide Complainants with copies of all empirical medical and scientific documentation which PPL and the company's expert witnesses rely and will rely upon as evidence in support of such a claim.

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I-77. If PPL's answer to I-76 is in the affirmative, please identify specifically all empirical evidence in the form of actual medical and scientific research studies upon which PPL and the company's expert witnesses rely and will rely in support of such a claim.

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I-80. If PPL's answer to I-79 is in the affirmative, please identify specifically all empirical evidence in the form of actual medical and scientific research studies upon which PPL and the company's expert witnesses rely and will rely in support of such a claim.

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I-83. If PPL's answer to I-82 is in the affirmative, please identify specifically all empirical evidence in the form of actual medical and scientific research studies upon which PPL and the company's expert witnesses rely and will rely in support of such a claim.

I-84. If PPL's answer to I-82 is in the affirmative, please produce and provide Complainants with copies of all empirical medical and scientific documentation which PPL and the company's expert witnesses rely and will rely upon as evidence in support of such a claim.

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I-86. If PPL's answer to I-85 is in the affirmative, please identify specifically all empirical evidence in the form of actual medical and scientific research studies upon which PPL and the company's expert witnesses rely and will rely in support of such a claim.

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I-89. If PPL's answer to I-88 is in the affirmative, please identify specifically all empirical evidence in the form of actual medical and scientific research studies upon which PPL and the company's expert witnesses rely and will rely in support of such a claim.

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I-91. In support of PPL's position in the instant case, do PPL and/or the company's expert witnesses assert or make the claim that there is a reliable medical and scientific basis upon which to conclude that chronic, long-term exposure to radiofrequency (RF) fields produced as a result of the installation of PPL's automated metering infrastructure ("AMI") meters **would not and will not** cause biological or adverse health effects?

I-92. If PPL's answer to I-91 is in the affirmative, please identify specifically all empirical evidence in the form of actual medical and scientific research studies upon which PPL and the company's expert witnesses rely and will rely in support of such a claim.

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I-98. If PPL's answer to I-97 is in the affirmative, please identify specifically all empirical evidence in the form of actual medical and scientific research studies upon which PPL and the company's expert witnesses rely and will rely in support of such a claim.

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I-101. If PPL's answer to I-100 is in the affirmative, please identify specifically all empirical evidence in the form of actual medical and scientific research studies upon which PPL and the company's expert witnesses rely and will rely in support of such a claim.

I-102. If PPL's answer to I-100 is in the affirmative, please produce and provide Complainants with copies of all empirical medical and scientific documentation which PPL and the company's expert witnesses rely and will rely upon as evidence in support of such a claim.

I-103. In support of PPL's position in the instant case, do PPL and/or the company's expert witnesses assert or make the claim that there is a reliable medical and scientific basis upon which to conclude that chronic, long-term exposure to radiofrequency (RF) fields produced as a result of the installation of PPL's automated metering infrastructure ("AMI") meters **would not and will not** exacerbate adverse health effects?

I-104. If PPL's answer to I-103 is in the affirmative, please identify specifically all empirical evidence in the form of actual medical and scientific research studies upon which PPL and the company's expert witnesses rely and will rely in support of such a claim.

I-105. If PPL's answer to I-103 is in the affirmative, please produce and provide Complainants with copies of all empirical medical and scientific documentation which PPL and the company's expert witnesses rely and will rely upon as evidence in support of such a claim.

I-106. In support of PPL's position in the instant case, do PPL and/or the company's expert witnesses assert or make the claim that there is a reliable medical and scientific basis upon which to conclude that chronic, long-term exposure to radiofrequency (RF) fields produced as a result of the installation of PPL's automated metering infrastructure ("AMI") meters **could not and cannot** exacerbate adverse health effects?

I-107. If PPL's answer to I-106 is in the affirmative, please identify specifically all empirical evidence in the form of actual medical and scientific research studies upon which PPL and the company's expert witnesses rely and will rely in support of such a claim.

I-108. If PPL's answer to I-106 is in the affirmative, please produce and provide Complainants with copies of all empirical medical and scientific documentation which PPL and the company's expert witnesses rely and will rely upon as evidence in support of such a claim.

I-109. Do PPL and/or the company's expert witnesses assert or make the claim that there is a reliable medical and scientific basis upon which to conclude that there are no causal mechanisms of interaction which can affect biological systems that are exposed to radiofrequency (RF) radiation at levels which are below the FCC's RF safety guidelines?

I-110. If PPL's answer to I-109 is in the affirmative, please identify specifically all empirical evidence in the form of actual medical and scientific research studies upon which PPL and the company's expert witnesses rely and will rely in support of such a claim.

I-111. If PPL's answer to I-109 is in the affirmative, please produce and provide Complainants with copies of all empirical medical and scientific documentation which PPL and the company's expert witnesses rely and will rely upon as evidence in support of such a claim.

I-112. Do PPL and/or the company's expert witnesses assert or make the claim that there is a reliable medical and scientific basis upon which to conclude that there are no causal mechanisms of interaction which can affect biological systems that are exposed to radiofrequency (RF) fields at levels which are below the FCC's RF safety guidelines?

I-113. If PPL's answer to I-112 is in the affirmative, please identify specifically all empirical evidence in the form of actual medical and scientific research studies upon which PPL and the company's expert witnesses rely and will rely in support of such a claim.

I-114. If PPL's answer to I-112 is in the affirmative, please produce and provide Complainants with copies of all empirical medical and scientific documentation which PPL and the company's expert witnesses rely and will rely upon as evidence in support of such a claim.

I-115. Do PPL and/or the company's expert witnesses assert or make the claim that there is a reliable medical and scientific basis upon which to conclude that there are no causal mechanisms of interaction which can adversely affect biological systems that are exposed to radiofrequency (RF) radiation at levels which are below the FCC's RF safety guidelines?

I-116. If PPL's answer to I-115 is in the affirmative, please identify specifically all empirical evidence in the form of actual medical and scientific research studies upon which PPL and the company's expert witnesses rely and will rely in support of such a claim.

I-117. If PPL's answer to I-115 is in the affirmative, please produce and provide Complainants with copies of all empirical medical and scientific documentation which PPL and the company's expert witnesses rely and will rely upon as evidence in support of such a claim.

I-118. Do PPL and/or the company's expert witnesses assert or make the claim that there is a reliable medical and scientific basis upon which to conclude that there are no causal mechanisms of interaction which can adversely affect biological systems that are exposed to radiofrequency (RF) fields at levels which are below the FCC's RF safety guidelines?

I-119. If PPL's answer to I-118 is in the affirmative, please identify specifically all empirical evidence in the form of actual medical and scientific research studies upon which PPL and the company's expert witnesses rely and will rely in support of such a claim.

I-120. If PPL's answer to I-118 is in the affirmative, please produce and provide Complainants with copies of all empirical medical and scientific documentation which PPL and the company's expert witnesses rely and will rely upon as evidence in support of such a claim.

I-121. Do PPL and/or the company's expert witnesses assert or make the claim that there is a reliable medical and scientific basis upon which to conclude that exposure to radiofrequency (RF) radiation at levels which are below the FCC's RF safety guidelines is without risk of biological effects?

I-122. If PPL's answer to I-121 is in the affirmative, please identify specifically all empirical evidence in the form of actual medical and scientific research studies upon which PPL and the company's expert witnesses rely and will rely in support of such a claim.

I-123. If PPL's answer to I-121 is in the affirmative, please produce and provide Complainants with copies of all empirical medical and scientific documentation which PPL and the company's expert witnesses rely and will rely upon as evidence in support of such a claim.

I-124. Do PPL and/or the company's expert witnesses assert or make the claim that there is a reliable medical and scientific basis upon which to conclude that exposure to radiofrequency (RF) radiation at levels which are below the FCC's RF safety guidelines is without risk of adverse health effects?

I-125. If PPL's answer to I-124 is in the affirmative, please identify specifically all empirical evidence in the form of actual medical and scientific research studies upon which PPL and the company's expert witnesses rely and will rely in support of such a claim.

I-126. If PPL's answer to I-124 is in the affirmative, please produce and provide Complainants with copies of all empirical medical and scientific documentation which PPL and the company's expert witnesses rely and will rely upon as evidence in support of such a claim.

I-127. Do PPL and/or the company's expert witnesses assert or make the claim that there is a reliable medical and scientific basis upon which to conclude that exposure to radiofrequency (RF) radiation at levels which are far below the FCC's RF safety guidelines is without risk of biological effects?

I-128. If PPL's answer to I-127 is in the affirmative, please identify specifically all empirical evidence in the form of actual medical and scientific research studies upon which PPL and the company's expert witnesses rely and will rely in support of such a claim.

I-129. If PPL's answer to I-127 is in the affirmative, please produce and provide Complainants with copies of all empirical medical and scientific documentation which PPL and the company's expert witnesses rely and will rely upon as evidence in support of such a claim.

I-130. Do PPL and/or the company's expert witnesses assert or make the claim that there is a reliable medical and scientific basis upon which to conclude that exposure to radiofrequency (RF) radiation at levels which are far below the FCC's RF safety guidelines is without risk of adverse health effects?

I-131. If PPL's answer to I-130 is in the affirmative, please identify specifically all empirical evidence in the form of actual medical and scientific research studies upon which PPL and the company's expert witnesses rely and will rely in support of such a claim.

I-132. If PPL's answer to I-130 is in the affirmative, please produce and provide Complainants with copies of all empirical medical and scientific documentation which PPL and the company's expert witnesses rely and will rely upon as evidence in support of such a claim.

I-133. Do PPL and/or the company's expert witnesses assert or make the claim that there is a reliable medical and scientific basis upon which to conclude that exposure to radiofrequency (RF) radiation at levels produced by PPL's AMI smart meter devices is without risk of biological effects?

I-134. If PPL's answer to I-133 is in the affirmative, please identify specifically all empirical evidence in the form of actual medical and scientific research studies upon which PPL and the company's expert witnesses rely and will rely in support of such a claim.

I-135. If PPL's answer to I-133 is in the affirmative, please produce and provide Complainants with copies of all empirical medical and scientific documentation which PPL and the company's expert witnesses rely and will rely upon as evidence in support of such a claim.

I-136. Do PPL and/or the company's expert witnesses assert or make the claim that there is a reliable medical and scientific basis upon which to conclude that exposure to radiofrequency (RF) radiation at levels produced by PPL's AMI smart meter devices is without risk of adverse health effects?

I-137. If PPL's answer to I-136 is in the affirmative, please identify specifically all empirical evidence in the form of actual medical and scientific research studies upon which PPL and the company's expert witnesses rely and will rely in support of such a claim.

I-138. If PPL's answer to I-136 is in the affirmative, please produce and provide Complainants with copies of all empirical medical and scientific documentation which PPL and the company's expert witnesses rely and will rely upon as evidence in support of such a claim.

I-139. Do PPL and/or the company's expert witnesses assert or make the claim that there is a reliable medical and scientific basis upon which to conclude that exposure to modulated radiofrequency (RF) radiation at levels produced by PPL's AMI smart meter devices is without risk of biological effects?

I-140. If PPL's answer to I-139 is in the affirmative, please identify specifically all empirical evidence in the form of actual medical and scientific research studies upon which PPL and the company's expert witnesses rely and will rely in support of such a claim.

I-141. If PPL's answer to I-139 is in the affirmative, please produce and provide Complainants with copies of all empirical medical and scientific documentation which PPL and the company's expert witnesses rely and will rely upon as evidence in support of such a claim.

I-142. Do PPL and/or the company's expert witnesses assert or make the claim that there is a reliable medical and scientific basis upon which to conclude that exposure to modulated radiofrequency (RF) radiation at levels produced by PPL's AMI smart meter devices is without risk of adverse health effects?

I-143. If PPL's answer to I-142 is in the affirmative, please identify specifically all empirical evidence in the form of actual medical and scientific research studies upon which PPL and the company's expert witnesses rely and will rely in support of such a claim.

I-144. If PPL's answer to I-142 is in the affirmative, please produce and provide Complainants with copies of all empirical medical and scientific documentation which PPL and the company's expert witnesses rely and will rely upon as evidence in support of such a claim.

I-145. Do PPL and/or the company's expert witnesses assert or make the claim that there is a reliable medical and scientific basis upon which to conclude that exposure to pulsed wave transmissions of radiofrequency (RF) radiation at levels produced by PPL's AMI smart meter devices is without risk of biological effects?

I-146. If PPL's answer to I-145 is in the affirmative, please identify specifically all empirical evidence in the form of actual medical and scientific research studies upon which PPL and the company's expert witnesses rely and will rely in support of such a claim.

I-147. If PPL's answer to I-145 is in the affirmative, please produce and provide Complainants with copies of all empirical medical and scientific documentation which PPL and the company's expert witnesses rely and will rely upon as evidence in support of such a claim.

I-148. Do PPL and/or the company's expert witnesses assert or make the claim that there is a reliable medical and scientific basis upon which to conclude that exposure to pulsed wave transmissions of radiofrequency (RF) radiation at levels produced by PPL's AMI smart meter devices is without risk of adverse health effects?

I-149. If PPL's answer to I-148 is in the affirmative, please identify specifically all empirical evidence in the form of actual medical and scientific research studies upon which PPL and the company's expert witnesses rely and will rely in support of such a claim.

I-150. If PPL's answer to I-148 is in the affirmative, please produce and provide Complainants with copies of all empirical medical and scientific documentation which PPL and the company's expert witnesses rely and will rely upon as evidence in support of such a claim.

I-151. Do PPL and/or the company's expert witnesses assert or make the claim that there is a reliable medical and scientific basis upon which to conclude that exposure to radiofrequency (RF) fields at levels produced by PPL's AMI smart meter devices is without risk of biological effects?

I-152. If PPL's answer to I-151 is in the affirmative, please identify specifically all empirical evidence in the form of actual medical and scientific research studies upon which PPL and the company's expert witnesses rely and will rely in support of such a claim.

I-153. If PPL's answer to I-151 is in the affirmative, please produce and provide Complainants with copies of all empirical medical and scientific documentation which PPL and the company's expert witnesses rely and will rely upon as evidence in support of such a claim.

I-154. Do PPL and/or the company's expert witnesses assert or make the claim that there is a reliable medical and scientific basis upon which to conclude that exposure to radiofrequency (RF) fields at levels produced by PPL's AMI smart meter devices is without risk of adverse health effects?

I-155. If PPL's answer to I-154 is in the affirmative, please identify specifically all empirical evidence in the form of actual medical and scientific research studies upon which PPL and the company's expert witnesses rely and will rely in support of such a claim.

I-156. If PPL's answer to I-154 is in the affirmative, please produce and provide Complainants with copies of all empirical medical and scientific documentation which PPL and the company's expert witnesses rely and will rely upon as evidence in support of such a claim.

(Note: The term *nonlinear* refers to a disproportionateness between a cause and its effect such that a cause of a given magnitude could have an effect of a disproportionately greater (or smaller) magnitude.)

I-154. Do PPL and/or the company's expert witnesses assert or make the claim that there is a reliable medical and scientific basis upon which to conclude that biological effects cannot and could not result from exposure to extremely low levels of radiofrequency (RF) radiation?

I-155. If PPL's answer to I-154 is in the affirmative, please identify specifically all empirical evidence in the form of actual medical and scientific research studies upon which PPL and the company's expert witnesses rely and will rely in support of such a claim.

I-156. If PPL's answer to I-154 is in the affirmative, please produce and provide Complainants with copies of all empirical medical and scientific documentation which PPL and the company's expert witnesses rely and will rely upon as evidence in support of such a claim.

I-157. Do PPL and/or the company's expert witnesses assert or make the claim that there is a reliable medical and scientific basis upon which to conclude that biological effects cannot and could not result from exposure to extremely low levels of radiofrequency (RF) radiation?

I-158. If PPL's answer to I-157 is in the affirmative, please identify specifically all empirical evidence in the form of actual medical and scientific research studies upon which PPL and the company's expert witnesses rely and will rely in support of such a claim.

I-159. If PPL's answer to I-157 is in the affirmative, please produce and provide Complainants with copies of all empirical medical and scientific documentation which PPL and the company's expert witnesses rely and will rely upon as evidence in support of such a claim.

I-160. Do PPL and/or the company's expert witnesses assert or make the claim that there is a reliable medical and scientific basis upon which to conclude that adverse health effects cannot and could not result from exposure to extremely low levels of radiofrequency (RF) radiation?

I-161. If PPL's answer to I-160 is in the affirmative, please identify specifically all empirical evidence in the form of actual medical and scientific research studies upon which PPL and the company's expert witnesses rely and will rely in support of such a claim.

I-162. If PPL's answer to I-160 is in the affirmative, please produce and provide Complainants with copies of all empirical medical and scientific documentation which PPL and the company's expert witnesses rely and will rely upon as evidence in support of such a claim.

I-163. Please state whether the signal transmission strength of PPL's AMI wireless smart meters will vary depending on the meters' relative locations or distances from other meters or data reception facilities in PPL's AMI network.

I-164. Please provide Complainants with a copies of any and all documentation in PPL's possession which details the terms of the company's rights of easement specifically with regard to Complainants' properties at 2424 Lafayette Avenue and 1823 Butztown Road, both in Bethlehem, PA.

I-165. Please cite any law, statute, official rule, or right of easement which would permit PPL to install radiofrequency transmission antennas on Complainants' homes without their consent.

I-166. Please cite any law, statute, official rule, or right of easement which would permit PPL to install computer devices on Complainants' homes without their consent.

I-167. Please cite any law, statute, official rule, or right of easement which would permit PPL to install **any** device other than a meter, only a meter, and nothing but a meter on Complainants' homes without their consent.

I-168. Please cite any law, statute, official rule, or right of easement which would permit PPL to use Complainants' homes for the company's AMI meters to function as "relay points to transmit data."

I-169. In Complainants' Interrogatories to PPL, Set II, Interrogatory No. II-59, Complainants asked PPL to "state whether or not the Landis+Gyr AMI smart meters deployed by PPL are 'UL 2735 Listed'." PPL responded by stating: "The Landis + Gyr AMI meters being deployed by PPL Electric for residential customers are UL Certified." Please provide only a "yes" or "no" answer to the following question: "Are the Landis+Gyr AMI meters being deployed by PPL Electric for residential customers UL 2735 Listed?"

I-170. Please identify with detailed specificity each and every customer data point that is measured by PPL's AMI wireless smart meter devices.

I-171. Please identify with detailed specificity each and every customer data point that is calculated by PPL's AMI wireless smart meter devices.

I-172. Please identify with detailed specificity each and every customer data point that is collected by PPL's AMI wireless smart meter devices.

I-173. Please identify with detailed specificity each and every customer data point that is stored by PPL's AMI wireless smart meter devices.

I-174. Please identify with detailed specificity each and every customer data point that is transmitted by PPL's AMI wireless smart meter devices.

I-175. Please identify with detailed specificity each and every customer data point that is aggregated by PPL's AMI wireless smart meter devices.

I-176. In reference to PPL's Customer Privacy Policy (PPL Electric Exhibit KD-4), please clarify and explain the following in detail:

(1) In the bullet item "Providing necessary information to authorized EGSs and/or third party representatives," what is "necessary information"?

(2) the bullet item "Aggregating data by retail electricity provider to settle the wholesale market"

(3) In the statement: "PPL Electric does not share AMI Data, except as required or permitted by law, regulatory agencies, or governmental authorities," specifically what exceptions are required or permitted by law, regulatory agencies or governmental authorities?

(4) According to PPL's privacy policy, does not the burden of responsibility fall upon the customer to do the necessary event log monitoring of the web portal in order to discover whether a user has gained unauthorized access to the customer's data?

(5) Concerning the statement, "PPL Electric may share AMI Data in an aggregated and anonymized form": Specifically what data is aggregated, and how is it anonymized? How can PPL ensure that third parties with whom the company shares such data are not able to disaggregate and de-anonymize the data? How would third parties use the data if they were to not be able to identify the customers associated with the data?

I-177. Please state whether PPL's AMI smart meters consume electric power for their operation.

I-178. If the answer to I-177 is in the affirmative, please state whether PPL's customers are bearing the cost of the electric power consumed in the operation the company's AMI smart meters.

I-179. If the answer to I-178 is in the affirmative, please state whether these charges have been fully and properly disclosed to PPL's customers.

I-180. Please state the total number of cases before the PA PUC in which PPL's legal counsel, Curtis Renner, of Watson & Renner, has been involved as a pro hac vice attorney.

I-181. Please identify all specific cases litigated within the Commonwealth of Pennsylvania in which Mr. Renner has been involved as a pro hac vice attorney and the dates and time periods of his involvement.

I-182. Please identify all cases by docket number and date that are, or have been, before the PA PUC in which Mr. Renner has been involved as a pro hac vice attorney.

I-183. Please identify all cases by docket number and date for which PPL has retained the services of Mr. Renner.

I-184. Please verify with documentation that, in the instant case, all procedural requirements for the admission of Mr. Renner pro hac vice have been met in accordance with Rule § 81.503, § 81.504, and § 81.505, including the filing of a written motion by a member of the Pennsylvania bar, the provision by Mr. Renner of all information required of him to the IOLTA Board, and payment of the requisite fee to the IOLTA Board.

I-185. Please indicate and verify the exact date on which Mr. Renner fully met all requirements of admission pro hac vice specified in I-184, supra, such that he thereby was able to be a party in the instant case.

PLACE STICKER AT TOP OF ENVELOPE TO THE RIGHT
OF THE RETURN ADDRESS, FOLD AT DOTTED LINE

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DEVIN T. RYAN, ESQ.
GARRETT P. LENT, ESQ.
POST & SCHELL PC
17 NORTH 2ND STREET
12TH FLOOR
HARRISBURG, PA 17101-1601



APPENDIX B

Lent, Garrett

From: Barnes, Elizabeth <EBARNES@pa.gov>
Sent: Wednesday, March 25, 2020 10:01 AM
To: Lent, Garrett
Cc: Ryan, Devin; Curt Renner; Caley, Danielle; Shafer, Michael J
Subject: RE: [External] Holder & Maculesky v. PPL - Docket Nos. F-2019-3008809; F-2019-3008832

FilingDate: 3/25/2020 12:32:00 PM

Mr. Lent:

You may have your extension as requested. However, I cannot issue any orders until after April 2, 2020, when it is expected I and my support staff at OALJ return to work in the office. Although I can type up an order and e-mail it to you, I have no computer access to attach it to the docket and e-serve it upon the parties.

I hope you and your witnesses are well.

Regards,

Elizabeth Barnes
Administrative Law Judge

From: Lent, Garrett <GLent@PostSchell.com>
Sent: Tuesday, March 24, 2020 10:48 AM
To: Barnes, Elizabeth <EBARNES@pa.gov>
Cc: Ryan, Devin <DRyan@PostSchell.com>; Curt Renner <crenner@w-r.com>; Caley, Danielle <DCaley@PostSchell.com>; Shafer, Michael J <MJShafer@pplweb.com>
Subject: [External] Holder & Maculesky v. PPL - Docket Nos. F-2019-3008809; F-2019-3008832

ATTENTION: This email message is from an external sender. Do not open links or attachments from unknown sources. To report suspicious email, forward the message as an attachment to CWOPA_SPAM@pa.gov.

You Honor:

Attached please find a letter requesting a thirty (30) day extension of time to file objections and answers to the Complainants' Set III discovery requests in the above captioned proceeding. A copy of the letter was e-filed this morning, and the Complainants will be served a copy via first class mail.

Thank you,

Garrett P. Lent
Associate
Post & Schell, P.C.
17 North Second Street
12th Floor
Harrisburg, PA 17101

717-612-6032 (Phone)

717-731-1979 (Fax)
GLent@PostSchell.com
www.postschell.com

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APPENDIX C



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Garrett P. Lent

glent@postschell.com
717-612-6032 Direct
717-731-1979 Direct Fax
File #: 167945

April 27, 2020

VIA E-MAIL (HLDRJ@JUNO.COM)

John & Janet Holder
2424 Lafayette Avenue
Bethlehem, PA 18107

Re: John and Janet Holder and June Maculesky v. PPL Electric Utilities Corporation
Docket Nos. F-2019-3008809, F-2019-3008832

Dear Sir or Madam:

Enclosed are the Objections of PPL Electric Utilities Corporation (“PPL Electric”) to the Interrogatories Propounded by John and Janet Holder and June Maculesky – Set III, in the above-referenced proceeding.

Copies will be provided as indicated on the Certificate of Service.

Sincerely,

Garrett P. Lent

GPL/jl
Enclosures

cc: Rosemary Chiavetta, Secretary (*Letter & Certificate of Service Only*)
Certificate of Service

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been served upon the following persons, in the manner indicated, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

VIA ELECTRONIC MAIL

June Maculesky
1823 Butztown Road
Bethlehem, PA 18017
(hldrj@juno.com)

Janet Holder
(POA for June Maculesky)
2424 Lafayette Avenue
Bethlehem, PA 18017
(hldrj@juno.com)

John & Janet Holder
2424 Lafayette Avenue
Bethlehem, PA 18017
(hldrj@juno.com)

Date: April 27, 2020



Garrett P. Lent

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

John and Janet Holder,	:	
	:	
Complainants,	:	
	:	
v.	:	Docket No. F-2019-3008809
	:	
PPL Electric Utilities Corporation,	:	
	:	
Respondent.	:	
	:	
June Maculesky,	:	
	:	
Complainant,	:	
	:	
v.	:	Docket No. F-2019-3008832
	:	
PPL Electric Utilities Corporation,	:	
	:	
Respondent.	:	

**OBJECTIONS OF PPL ELECTRIC UTILITIES CORPORATION TO THE
INTERROGATORIES OF JOHN AND JANET HOLDER AND JUNE MACULESKY
(SET III)**

Pursuant to 52 Pa. Code § 5.342(c), PPL Electric Utilities Corporation (“PPL Electric” or the “Company”), by and through its attorneys, hereby serves these objections to Question Nos. 1 through 185 of the third set of interrogatories of John and Janet Holder and June Maculesky (“Complainants”) served on March 16, 2020, via first class mail (“Complainants Set III Discovery”).¹

As explained below, PPL Electric objects to Question Nos. 1 through 185 on the grounds that they are unreasonably repetitive, vague, incomprehensible, unduly burdensome, not

¹ On March 26, 2020, PPL Electric filed a request for an additional thirty (30) days during which it could object to these interrogatories. The Administrative Law Judge Elizabeth H. Barnes granted this request, and permitted PPL Electric until April 27, 2020, to serve its objections. Thus, these objections are timely served.

reasonably calculated to lead to the discovery of admissible evidence and improperly seek legal opinions.

In addition, PPL Electric submits that the Complainants' Set III Discovery is sought in bad faith. The one hundred and eighty five (185) requests included in Complainants' Set III Discovery are almost entirely duplicative of prior discovery requests, or seek the same information as prior requests, which were objected to and/or answered by PPL Electric. In addition, the requests included in Complainants' Set III Discovery are duplicative and seek the same information as other requests included in Set III, or ask the very same question as other requests with minor changes to phrasing or word choice. This set of discovery, which comes after the Complainants previously inundated the Commission and PPL Electric with hundreds of inadmissible proposed exhibits, further evidences the Complainants' desire to delay the prompt resolution of this proceeding with unnecessary and burdensome submissions that flaunt the Commission's rules and regulations. As such, PPL Electric objects to Complainants' Set III Discovery and submits that these requests were submitted in bad faith and are only intended to harass and annoy PPL Electric.

In support, PPL Electric states as follows:

I. BAD FAITH OBJECTION

1. Pursuant to Section 5.321(c) of the Commission's regulations, a party may obtain discovery of any matter not privileged that is relevant to a pending proceeding and that is reasonably calculated to lead to the discovery of admissible evidence. 52 Pa. Code § 5.321(c). However, Section 5.361(a) of the Commission's regulations prohibits discovery which is sought in bad faith or would cause unreasonable annoyance. *See id.* § 5.361(a)(1)-(2).

2. The Commission has recognized that a complainant acts in bad faith where they take actions that are designed to intentionally and unduly delay the proceeding. *See Berman v.*

Bell Telephone Company of Pennsylvania, Docket No. C-00923784, 1992 Pa. PUC LEXIS 73 (Initial Decision dated June 19, 1992).

3. PPL Electric objects to Question Nos. 1-185 of the Complainants' Set III Discovery as being sought in bad faith and being sought to unreasonably annoy and harass PPL Electric and its witnesses. As explained below, the timing of the Complainants' Set III Discovery requests, the number of requests, and the subject matter of the requests evidence bad faith and an attempt to abuse the discovery process to harass and annoy PPL Electric and its witnesses.

4. The Complainants have already sought and obtained ample discovery from PPL Electric. On March 27, 2019, PPL Electric was served with the Complainants' Set I Discovery. The Set I Discovery consisted of 52 interrogatories and requests for production of documents. PPL Electric served its responses on April 16, 2019. In addition, PPL Electric was served with the Complainants' Set II Discovery on September 21, 2019. The Set II Discovery consisted of 84 interrogatories and requests for production of documents. PPL Electric served its responses on October 15, 2019. To date, the Complainants have already sought and obtained information responsive to over 100 discovery requests.

5. Despite these prior requests, on March 16, 2020, the Complainants served the Complainants' Set III Discovery, which consists of 185 interrogatories and requests for production of documents.

6. The timing of these requests evidences bad faith. The Complainants' served 185 discovery requests over a year after having instituted the above-captioned Formal Complaints, three months after having filed an Amended Complainant, and less than one month before the date of hearing previously scheduled for April 9, 2020. Moreover, these discovery requests—

which largely seek information provided in PPL Electric’s direct testimony—were served after PPL Electric provided its direct testimony in this proceeding. As such, it appears that the Complainants served the Set III Discovery (less than a month before the previously-scheduled hearing) in an attempt to delay the administration of the hearing by initiating additional discovery disputes.²

7. Moreover, the sheer number of these requests demonstrates the Complainants have sought this discovery in bad faith. Despite having sought and obtained responses to over 100 prior discovery requests, the Complainants’ Set III Discovery contains an additional 185 requests, which ask for information that is set forth in PPL Electric’s direct testimony.

8. In addition to the number and timing of these requests, the subject matter of the Set III Discovery requests indicates bad faith. Specifically, the Set III Discovery requests are repetitive of prior requests and seek information that has already been provided to the Complainants.

9. For example, Complainants’ Set II, Question Nos. 1 through 5 sought the following information:

1. In support of its position in the instant case, does PPL assert or make the claim that radiofrequency radiation at power densities which are below the FCC's current safety guidelines cannot, do not, could not, and will not cause or increase the risk of biological or adverse health effects?
2. In support of its position in the instant case, does PPL assert or make the claim that radiofrequency radiation at specific absorption rate (SAR) levels which are below the FCC's current safety guidelines cannot, do not, could not, and will not cause or increase the risk of biological or adverse health effects?

² PPL Electric recognizes that the April 9, 2020 hearing date was subsequently cancelled due to the COVID-19 pandemic. However, the Set III Discovery were prepared and served prior to its cancellation and, ostensibly, with knowledge that the hearing was less than a month away.

3. If PPL's answer to I-1 or I-2 is in the affirmative, please identify specifically all evidence upon which PPL relies for support of such claims, citing all and only peer-reviewed scientific research which was fully independent and completely without conflicts of interest and which excludes studies that were funded, in whole or in part, by wireless technologies and related industries.

4. Of all the peer-reviewed scientific research studies cited in PPL's response to I-3 that reported negative or inconclusive results, please indicate specifically which, if any, PPL would purport to completely counter, negate or nullify the positive findings of one or more peer-reviewed scientific research studies that have reported biological and/or adverse health effects from RF exposure.

5. Of all the peer-reviewed scientific research studies cited in PPL's response to I-4, please identify only those, if any, which were genuine attempts to replicate the positive findings of some prior research study and which faithfully and precisely followed all methodological and design protocols of the modeled positive study, but which nonetheless obtained negative or inconclusive results.

10. PPL Electric responded to Complainants' Set II, Question Nos. 1 through 5 on October 15, 2019, and explained that its position is that there is no reliable medical or scientific basis upon which to conclude that the installation of the automated metering infrastructure ("AMI") meters would cause, contribute to, or exacerbate adverse health effects. In support of that position, the Company pointed to the expert opinions of Dr. Christopher Davis and Dr. Mark Israel, whose written testimony would be served in this proceeding on or before March 1, 2020, in accordance with the established litigation schedule. Ultimately, PPL Electric served the Complainant with the testimony of Dr. Davis and Dr. Israel on February 28, 2020.

11. The Complainants' Set III Discovery requests essentially seek this very same information. For example, Complainants' Set III, Question Nos. 1 through 3³ request:

³ PPL Electric notes that the Complainants make additional, nearly identical requests that merely exchange the phrase "would not and will not cause" with "would not and will not contribute to" or "would not and will not exacerbate." The Company's bad faith objection should be understood to apply to all of the requests set forth in the Complainants' Set III.

I-1. In support of PPL's position in the instant case, do PPL and/or the company's expert witnesses assert or make the claim that there is a reliable medical and scientific basis upon which to conclude that exposure to radiofrequency (RF) radiation produced as a result of the installation of PPL's automated metering infrastructure ("AMP") meters would not and will not cause biological or adverse health effects?

I-2. If PPL's answer to I-1 is in the affirmative, please identify specifically all empirical evidence in the form of actual medical and scientific research studies upon which PPL and the company's expert witnesses rely and will rely in support of such a claim.

I-3. If PPL's answer to I-1 is in the affirmative, please produce and provide Complainants with copies of all empirical medical and scientific documentation which PPL and the company's expert witnesses rely and will rely upon as evidence in support of such a claim.

Similarly, Complainants Set III, Question Nos. 37 through 93 ask whether it is PPL Electric's position that there is a reliable medical and scientific basis upon which to conclude that there are no causal mechanisms of interaction which can affect biological systems that are exposed to radiofrequency (RF) radiation at levels which are below the FCC's RF safety guidelines by varying, undefined, and vague amounts (*e.g.*, "below" vs. "far below"), and ask PPL Electric to identify and provide documents used to support its position. Complainants Set III, Question Nos. 109 through 111 also seek the same information, requesting:

I-109. Do PPL and/or the company's expert witnesses assert or make the claim that there is a reliable medical and scientific basis upon which to conclude that there are no causal mechanisms of interaction which can affect biological systems that are exposed to radiofrequency (RF) radiation at levels which are below the FCC's RF safety guidelines?

I-110. If PPL's answer to I-109 is in the affirmative, please identify specifically all empirical evidence in the form of actual medical and scientific research studies upon which PPL and the company's expert witnesses rely and will rely in support of such a claim.

I-111. If PPL's answer to I-109 is in the affirmative, please produce and provide Complainants with copies of all empirical

medical and scientific documentation which PPL and the company's expert witnesses rely and will rely upon as evidence in support of such a claim.

And Complainants Set III, Question Nos. 112 through 162 repeat similar questions seeking information previously requested in and provided in response to the Complainants' Set II Discovery.

12. Importantly, each of these requests specifically seeks information already provided to the Complainants—*i.e.*, (1) an affirmation of PPL Electric's position that was already provided in its responses to Complainants' Set II of discovery requests and in the Company's direct testimony, (2) an identification of all studies relied upon by PPL Electric and its witnesses, which was already provided in the Company's direct testimony, and (3) copies of all studies relied upon by PPL Electric and its witnesses, which were identified in the Company's direct testimony. The only thing that changes from question to question are the vague and undefined terms and complicated phrasing used by the Complainant to repeat the request in "new ways."

13. Although PPL Electric recognizes that a party may seek discovery by asking for the same information in different ways, the number of times across two separate discovery sets—totaling over 200 interrogatories—that the Complainants have repeated their requests for the same information demonstrates that this discovery is being sought in bad faith. The Complainants have engaged in a course of action that appears meant to inundate PPL Electric, its employees, and its witnesses with requests for information that is already in the Complainants' possession. Such actions are not permitted under the Commission's discovery rules and should be rejected.

14. Finally, Question Nos. 180-185 of the Complainants' Set III Discovery specifically seek information regarding the involvement of one of PPL Electric's attorneys—Mr.

Curtis Renner—in proceedings before the Commission. Not only is this information irrelevant, it appears to be nothing more than an attempt by the Complainants to inaccurately call into question Mr. Renner’s ability to practice before the Commission. Importantly, Mr. Renner is admitted to the Pennsylvania bar and is licensed to practice in the Commonwealth of Pennsylvania. The Complainants’ attempts to interrogate the Company and Mr. Renner about his participation in other proceedings *pro hac vice* serve no purpose other than to harass the Company and Mr. Renner. As such, PPL Electric submits that these requests further demonstrate that Complainants’ Set III Discovery is being sought in bad faith.

15. Therefore and for the reasons more fully explained above, PPL Electric objects to Complainants’ Set III Discovery in its entirety because the requests have been propounded in bad faith.

II. SPECIFIC OBJECTIONS

A. OBJECTIONS TO COMPLAINANTS-III-1⁴ THROUGH 18

16. Complainants Set III, Question No. 1 through 18 request the following:

I-1. In support of PPL's position in the instant case, do PPL and/or the company's expert witnesses assert or make the claim that there is a reliable medical and scientific basis upon which to conclude that exposure to radiofrequency (RF) radiation produced as a result of the installation of PPL's automated metering infrastructure ("AMP") meters **would not and will not** cause biological or adverse health effects?

I-2. If PPL's answer to I-1 is in the affirmative, please identify specifically all empirical evidence in the form of actual medical and scientific research studies upon which PPL and the company's expert witnesses rely and will rely in support of such a claim.

I-3. If PPL's answer to I-1 is in the affirmative, please produce and provide Complainants with copies of all empirical medical and scientific documentation which PPL and the company's expert

⁴ In the Complainants’ Set III requests, the Complainants have labeled each request as “I-1,” for example. However, this is the Complainants third set of discovery requests to PPL Electric.

witnesses rely and will rely upon as evidence in support of such a claim.

I-4. In support of PPL's position in the instant case, do PPL and/or the company's expert witnesses assert or make the claim that there is a reliable medical and scientific basis upon which to conclude that exposure to radiofrequency (RF) radiation produced as a result of the installation of PPL's automated metering infrastructure ("AMI") meters **could not and cannot** cause biological or adverse health effects?

I-5. If PPL's answer to I-4 is in the affirmative, please identify specifically all empirical evidence in the form of actual medical and scientific research studies upon which PPL and the company's expert witnesses rely and will rely in support of such a claim.

I-6. If PPL's answer to I-4 is in the affirmative, please produce and provide Complainants with copies of all empirical medical and scientific documentation which PPL and the company's expert witnesses rely and will rely upon as evidence in support of such a claim.

I-7. In support of PPL's position in the instant case, do PPL and/or the company's expert witnesses assert or make the claim that there is a reliable medical and scientific basis upon which to conclude that exposure to radiofrequency (RF) radiation produced as a result of the installation of PPL's automated metering infrastructure ("AMI") meters **would not and will not** contribute to biological or adverse health effects?

I-8. If PPL's answer to I-7 is in the affirmative, please identify specifically all empirical evidence in the form of actual medical and scientific research studies upon which PPL and the company's expert witnesses rely and will rely in support of such a claim.

I-9. If PPL's answer to I-7 is in the affirmative, please produce and provide Complainants with copies of all empirical medical and scientific documentation which PPL and the company's expert witnesses rely and will rely upon as evidence in support of such a claim.

I-10. In support of PPL's position in the instant case, do PPL and/or the company's expert witnesses assert or make the claim that there is a reliable medical and scientific basis upon which to conclude that exposure to radiofrequency (RF) radiation produced as a result of the installation of PPL's automated metering infrastructure ("AMI") meters **could not and cannot** contribute to

biological or adverse health effects?

I-11. If PPL's answer to I-10 is in the affirmative, please identify specifically all empirical evidence in the form of actual medical and scientific research studies upon which PPL and the company's expert witnesses rely and will rely in support of such a claim.

I-12. If PPL's answer to I-10 is in the affirmative, please produce and provide Complainants with copies of all empirical medical and scientific documentation which PPL and the company's expert witnesses rely and will rely upon as evidence in support of such a claim.

I-13. In support of PPL's position in the instant case, do PPL and/or the company's expert witnesses assert or make the claim that there is a reliable medical and scientific basis upon which to conclude that exposure to radiofrequency (RF) radiation produced as a result of the installation of PPL's automated metering infrastructure ("AMP") meters **would not and will not** exacerbate adverse health effects?

I-14. If PPL's answer to I-13 is in the affirmative, please identify specifically all empirical evidence in the form of actual medical and scientific research studies upon which PPL and the company's expert witnesses rely and will rely in support of such a claim.

I-15. If PPL's answer to I-13 is in the affirmative, please produce and provide Complainants with copies of all empirical medical and scientific documentation which PPL and the company's expert witnesses rely and will rely upon as evidence in support of such a claim.

I-16. In support of PPL's position in the instant case, do PPL and/or the company's expert witnesses assert or make the claim that there is a reliable medical and scientific basis upon which to conclude that exposure to radiofrequency (RF) radiation produced as a result of the installation of PPL's automated metering infrastructure ("AMI") meters **could not and cannot** exacerbate adverse health effects?

I-17. If PPL's answer to I-16 is in the affirmative, please identify specifically all empirical evidence in the form of actual medical and scientific research studies upon which PPL and the company's expert witnesses rely and will rely in support of such a claim.

I-18. If PPL's answer to I-16 is in the affirmative, please produce and provide Complainants with copies of all empirical medical and scientific documentation which PPL and the company's expert

witnesses rely and will rely upon as evidence in support of such a claim.

17. The Company objects to Complainants-III-1 through 18 on the grounds that the requests are repetitive of prior requests, overly broad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence.

18. These interrogatories are repetitive of prior requests to which PPL Electric has provided responses. For example, PPL Electric objected and responded without waiving its objection to prior discovery requests seeking the bases for the opinions of its expert witnesses. *See, e.g.*, PPL Electric Responses to Holder-II-1 through Holder-II-4. Therein, PPL Electric stated it would provide this information in the written direct testimony of its expert witnesses, in accordance with the litigation schedule established in this case. PPL Electric served written direct testimony on February 28, 2020, and its direct testimony sets forth the Company's position and the scientific and medical opinions of its expert witnesses. Complainants-III-1 through 18 simply ask for information that is already in the Complainants' possession.

19. In addition, these interrogatories are based upon a series of complicated compound phrases and sentences, which make responding to the discovery requests unreasonably difficult. For example, the Complainants repeatedly use the phrases, "would not and will not cause biological or adverse health effects," or "could not and cannot cause biological or adverse health effects," or some iteration thereof which exchanges "cause" for "contribute" or "exacerbate."

20. Further, Question Nos. 2, 3, 5, 6, 8, 9, 11, 12, 14, 15, 17 and 18 are overly broad and unduly burdensome because they request PPL Electric to identify "identify specifically all empirical evidence in the form of actual medical and scientific research studies upon which PPL and the company's expert witnesses rely and will rely" and to "provide Complainants with copies

of all empirical medical and scientific documentation which PPL and the company's expert witnesses rely and will rely upon as evidence.” PPL Electric’s expert witnesses have reviewed hundreds of studies in formulating their expert opinions, and have specifically identified relevant studies in their written direct testimony. It is unduly burdensome for PPL Electric to identify these studies a second time and to produce copies of these studies for the Complainants, where the Complainants can already access copies of the identified studies themselves.

21. Finally, these requests are not reasonably calculated to lead to the discovery of any additional, admissible evidence. PPL Electric has already submitted its written direct testimony, which provides the information sought in these discovery requests. The information sought by these requests is already in the Complainants’ possession and, therefore, these requests are not reasonably calculated to lead to the discovery of admissible evidence.

22. For these reasons, these interrogatories are repetitive, overly broad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence.

B. OBJECTIONS TO COMPLAINANTS-III-19 THROUGH 36

23. Complainants Set III, Question Nos. 19 through 36 requests the following:

I-19. In support of PPL's position in the instant case, do PPL and/or the company's expert witnesses assert or make the claim that there is a reliable medical and scientific basis upon which to conclude that chronic, long-term exposure to frequent, day-and-night transmissions of radiofrequency (RF) radiation produced as a result of the installation of PPL's automated metering infrastructure ("AMI") meters **would not and will not** cause biological or adverse health effects?

I-20. If PPL's answer to I-19 is in the affirmative, please identify specifically all empirical evidence in the form of actual medical and scientific research studies upon which PPL and the company's expert witnesses rely and will rely in support of such a claim.

I-21. If PPL's answer to I-19 is in the affirmative, please produce and provide Complainants with copies of all empirical medical and scientific documentation which PPL and the company's expert

witnesses rely and will rely upon as evidence in support of such a claim.

I-22. In support of PPL's position in the instant case, do PPL and/or the company's expert witnesses assert or make the claim that there is a reliable medical and scientific basis upon which to conclude that chronic, long-term exposure to frequent, day-and-night transmissions of radiofrequency (RF) radiation produced as a result of the installation of PPL's automated metering infrastructure ("AMI") meters **could not and cannot** cause biological or adverse health effects?

I-23. If PPL's answer to I-22 is in the affirmative, please identify specifically all empirical evidence in the form of actual medical and scientific research studies upon which PPL and the company's expert witnesses rely and will rely in support of such a claim.

I-24. If PPL's answer to I-22 is in the affirmative, please produce and provide Complainants with copies of all empirical medical and scientific documentation which PPL and the company's expert witnesses rely and will rely upon as evidence in support of such a claim.

I-25. In support of PPL's position in the instant case, do PPL and/or the company's expert witnesses assert or make the claim that there is a reliable medical and scientific basis upon which to conclude that chronic, long-term exposure to frequent, day-and-night transmissions of radiofrequency (RF) radiation produced as a result of the installation of PPL's automated metering infrastructure ("AMP") meters **would not and will not** contribute to biological or adverse health effects?

I-26. If PPL's answer to I-25 is in the affirmative, please identify specifically all empirical evidence in the form of actual medical and scientific research studies upon which PPL and the company's expert witnesses rely and will rely in support of such a claim.

I-27. If PPL's answer to I-25 is in the affirmative, please produce and provide Complainants with copies of all empirical medical and scientific documentation which PPL and the company's expert witnesses rely and will rely upon as evidence in support of such a claim.

I-28. In support of PPL's position in the instant case, do PPL and/or the company's expert witnesses assert or make the claim that there is a reliable medical and scientific basis upon which to conclude that chronic, long-term exposure to frequent, day-and-

night transmissions of radiofrequency (RF) radiation produced as a result of the installation of PPL's automated metering infrastructure ("AMI") meters **could not and cannot** contribute to biological or adverse health effects?

I-29. If PPL's answer to I-28 is in the affirmative, please identify specifically all empirical evidence in the form of actual medical and scientific research studies upon which PPL and the company's expert witnesses rely and will rely in support of such a claim.

I-30. If PPL's answer to I-28 is in the affirmative, please produce and provide Complainants with copies of all empirical medical and scientific documentation which PPL and the company's expert witnesses rely and will rely upon as evidence in support of such a claim.

I-31. In support of PPL's position in the instant case, do PPL and/or the company's expert witnesses assert or make the claim that there is a reliable medical and scientific basis upon which to conclude that chronic, long-term exposure to frequent, day-and-night transmissions of radiofrequency (RF) radiation produced as a result of the installation of PPL's automated metering infrastructure ("AMI") meters **would not and will not** exacerbate adverse health effects?

I-32. If PPL's answer to I-31 is in the affirmative, please identify specifically all empirical evidence in the form of actual medical and scientific research studies upon which PPL and the company's expert witnesses rely and will rely in support of such a claim. I-33. If PPL's answer to I-31 is in the affirmative, please produce and provide Complainants with copies of all empirical medical and scientific documentation which PPL and the company's expert witnesses rely and will rely upon as evidence in support of such a claim.

I-34. In support of PPL's position in the instant case, do PPL and/or the company's expert witnesses assert or make the claim that there is a reliable medical and scientific basis upon which to conclude that chronic, long-term exposure to frequent, day-and-night transmissions of radiofrequency (RF) radiation produced as a result of the installation of PPL's automated metering infrastructure ("AMI") meters **could not and cannot** exacerbate adverse health effects?

I-35. If PPL's answer to I-34 is in the affirmative, please identify specifically all empirical evidence in the form of actual medical and scientific research studies upon which PPL and the company's

expert witnesses rely and will rely in support of such a claim.

I-36. If PPL's answer to I-34 is in the affirmative, please produce and provide Complainants with copies of all empirical medical and scientific documentation which PPL and the company's expert witnesses rely and will rely upon as evidence in support of such a claim.

24. The Company objects to Complainants-III-19 through 36 on the grounds that the requests are repetitive of prior requests, vague, incomprehensible, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence.

25. These interrogatories are repetitive of prior requests to which PPL Electric has provided responses. For example, PPL Electric objected and responded without waiving its objection to prior discovery requests seeking the bases for the opinions of its expert witnesses. *See, e.g.*, PPL Electric Responses to Holder-II-1 through Holder-II-4. Therein, PPL Electric stated it would provide this information in the written direct testimony of its expert witnesses, in accordance with the litigation schedule established in this case. PPL Electric served written direct testimony on February 28, 2020, and its direct testimony sets forth its position and the scientific and medical opinions of its expert witnesses. Complainants-III-19 through 36 simply ask for information that is already in the Complainants' possession.

26. The interrogatories use a number of vague and undefined terms, such as "chronic, long-term exposure," "frequent," "day-and-night transmission."⁵ Without clarification as to the meaning of these terms, PPL Electric cannot reasonably provide a complete and accurate response.

27. In addition, these interrogatories are based upon a series of complicated

⁵ While the Complainant attempts to clarify the meaning of "day-and-night transmission," the only explanation provide is that it "does not necessarily mean continuous transmission." This explanation does not clarify what the Complainants mean by the use of this term and, therefore, it would be unreasonable for PPL Electric to be required to guess their meaning in formulating a response.

compound phrases and sentences, which make responding to the discovery requests unreasonably difficult. For example, the Complainants repeatedly use the phrases, “would not and will not cause biological or adverse health effects,” or “could not and cannot cause biological or adverse health effects,” or some iteration thereof which exchanges “cause” for “contribute” or “exacerbate.”

28. Further, Question Nos. 20, 21, 23, 24, 26, 27, 29, 30, 32, 33, 35 and 36 are unduly burdensome because they request PPL Electric to identify “identify specifically all empirical evidence in the form of actual medical and scientific research studies upon which PPL and the company's expert witnesses rely and will rely” and to “provide Complainants with copies of all empirical medical and scientific documentation which PPL and the company's expert witnesses rely and will rely upon as evidence.” PPL Electric’s expert witnesses have reviewed hundreds of studies in formulating their expert opinions, and have specifically identified relevant studies in their written direct testimony. It is unduly burdensome for PPL Electric to identify these studies a second time and to produce copies of these studies for the Complainants, where the Complainants can already access copies of the identified studies themselves.

29. Finally, these requests are not reasonably calculated to lead to the discovery of any additional, admissible evidence. PPL Electric has already submitted its written direct testimony, which provides the information sought in these discovery requests. The information sought by these requests is already in the Complainants’ possession and, therefore, these requests are not reasonably calculated to lead to the discovery of admissible evidence.

30. For these reasons, these interrogatories are repetitive, vague, incomprehensible, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence.

C. OBJECTIONS TO COMPLAINANTS-III-37 THROUGH 54

31. Complainants Set III, Question Nos. 37 through 54 request the following:

I-37. In support of PPL's position in the instant case, do PPL and/or the company's expert witnesses assert or make the claim that there is a reliable medical and scientific basis upon which to conclude that exposure to radiofrequency radiation at levels below the FCC RF safety guidelines as a result of the installation of PPL's AMI meters **would not and will not** cause biological or adverse health effects?

I-38. If PPL's answer to 1-37 is in the affirmative, please identify specifically all empirical evidence in the form of actual medical and scientific research studies upon which PPL and the company's expert witnesses rely and will rely in support of such a claim.

I-39. If PPL's answer to 1-37 is in the affirmative, please produce and provide Complainants with copies of all empirical medical and scientific documentation which PPL and the company's expert witnesses rely and will rely upon as evidence in support of such a claim.

I-40. In support of PPL's position in the instant case, do PPL and/or the company's expert witnesses assert or make the claim that there is a reliable medical and scientific basis upon which to conclude that exposure to radiofrequency radiation at levels below the FCC RF safety guidelines as a result of the installation of PPL's AMI meters **could not and cannot** cause biological or adverse health effects?

I-41. If PPL's answer to 1-40 is in the affirmative, please identify specifically all empirical evidence in the form of actual medical and scientific research studies upon which PPL and the company's expert witnesses rely and will rely in support of such a claim.

I-42. If PPL's answer to 1-40 is in the affirmative, please produce and provide Complainants with copies of all empirical medical and scientific documentation which PPL and the company's expert witnesses rely and will rely upon as evidence in support of such a claim.

I-43. In support of PPL's position in the instant case, do PPL and/or the company's expert witnesses assert or make the claim that there is a reliable medical and scientific basis upon which to conclude that exposure to radiofrequency radiation at levels below the FCC RF safety guidelines as a result of the installation of PPL's

AMI meters **would not and will not** contribute to biological or adverse health effects?

I-44. If PPL's answer to 1-43 is in the affirmative, please identify specifically all empirical evidence in the form of actual medical and scientific research studies upon which PPL and the company's expert witnesses rely and will rely in support of such a claim.

I-45. If PPL's answer to 1-43 is in the affirmative, please produce and provide Complainants with copies of all empirical medical and scientific documentation which PPL and the company's expert witnesses rely and will rely upon as evidence in support of such a claim.

I-46. In support of PPL's position in the instant case, do PPL and/or the company's expert witnesses assert or make the claim that there is a reliable medical and scientific basis upon which to conclude that exposure to radiofrequency radiation at levels below the FCC RF safety guidelines as a result of the installation of PPL's AMI meters **could not and cannot** contribute to biological or adverse health effects?

I-47. If PPL's answer to 1-46 is in the affirmative, please identify specifically all empirical evidence in the form of actual medical and scientific research studies upon which PPL and the company's expert witnesses rely and will rely in support of such a claim.

I-48. If PPL's answer to 1-46 is in the affirmative, please produce and provide Complainants with copies of all empirical medical and scientific documentation which PPL and the company's expert witnesses rely and will rely upon as evidence in support of such a claim.

I-49. In support of PPL's position in the instant case, do PPL and/or the company's expert witnesses assert or make the claim that there is a reliable medical and scientific basis upon which to conclude that exposure to radiofrequency radiation at levels below the FCC RF safety guidelines as a result of the installation of PPL's AMI meters **would not and will not** exacerbate adverse health effects?

I-50. If PPL's answer to 1-49 is in the affirmative, please identify specifically all empirical evidence in the form of actual medical and scientific research studies upon which PPL and the company's expert witnesses rely and will rely in support of such a claim.

I-51. If PPL's answer to 1-49 is in the affirmative, please produce and provide Complainants with copies of all empirical medical and

scientific documentation which PPL and the company's expert witnesses rely and will rely upon as evidence in support of such a claim.

I-52. In support of PPL's position in the instant case, do PPL and/or the company's expert witnesses assert or make the claim that there is a reliable medical and scientific basis upon which to conclude that exposure to radiofrequency radiation at levels below the FCC RF safety guidelines as a result of the installation of PPL's AMI meters **could not** and **cannot** exacerbate adverse health effects?

I-53. If PPL's answer to 1-52 is in the affirmative, please identify specifically all empirical evidence in the form of actual medical and scientific research studies upon which PPL and the company's expert witnesses rely and will rely in support of such a claim.

I-54. If PPL's answer to 1-52 is in the affirmative, please produce and provide Complainants with copies of all empirical medical and scientific documentation which PPL and the company's expert witnesses rely and will rely upon as evidence in support of such a claim.

32. The Company objects to Complainants-III-37 through 54 on the grounds that the requests are repetitive of prior requests, vague, incomprehensible, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence.

33. These interrogatories are repetitive of prior requests to which PPL Electric has provided responses. For example, PPL Electric objected and responded without waiving its objection to prior discovery requests seeking the bases for the opinions of its expert witnesses. *See, e.g.,* PPL Electric Responses to Holder-II-1 through Holder-II-4. Therein, PPL Electric stated it would provide this information in the written direct testimony of its expert witnesses, in accordance with the litigation schedule established in this case. PPL Electric served written direct testimony on February 28, 2020, and its direct testimony sets forth its position and the scientific and medical opinions of its expert witnesses. Complainants-III-37 through 54 simply ask for information that is already in the Complainants' possession.

34. Moreover, these requests are duplicative of later requests contained in Complainants' Set III. Specifically, Complainants-III-109 through 132 request whether it is PPL Electric's position that there is a reliable medical and scientific basis upon which to conclude that there are no causal mechanisms of interaction which can adversely affect biological systems or health that are exposed to radiofrequency (RF) radiation at levels which are below the FCC's RF safety guidelines by varying, undefined and vague amounts (*e.g.*, "below" vs. "far below") or whether it is PPL Electric's position that its AMI meters and the radiofrequency waves they emit do not cause, contribute to, or exacerbate adverse health conditions, and ask PPL Electric to identify and provide documents used to support its position. It is unreasonably burdensome and repetitive for PPL Electric provide the same information (which it has already provided) in response to discovery requests seeking the same information but asked different ways.

35. The interrogatories also use a number of vague and undefined terms, such as "levels below." Without clarification as to the meaning of this term, PPL Electric cannot reasonably provide a complete and accurate response.

36. In addition, these interrogatories are based upon a series of complicated compound phrases and sentences, which make responding to the discovery requests unreasonably difficult. For example, the Complainants repeatedly use the phrases, "would not and will not cause biological or adverse health effects," or "could not and cannot cause biological or adverse health effects," or some iteration thereof which exchanges "cause" for "contribute" or "exacerbate."

37. Further, Question Nos. 38, 39, 41, 42, 44, 45, 47, 48, 50, 51, 53 and 54 are unduly burdensome because they request PPL Electric to identify "identify specifically all empirical evidence in the form of actual medical and scientific research studies upon which PPL and the

company's expert witnesses rely and will rely” and to “provide Complainants with copies of all empirical medical and scientific documentation which PPL and the company's expert witnesses rely and will rely upon as evidence.” PPL Electric’s expert witnesses have reviewed hundreds of studies in formulating their expert opinions, and have specifically identified relevant studies in their written direct testimony. It is unduly burdensome for PPL Electric to identify these studies a second time and to produce copies of these studies for the Complainants, where the Complainants can already access copies of the identified studies themselves.

38. Finally, these requests are not reasonably calculated to lead to the discovery of any additional, admissible evidence. PPL Electric has already submitted its written direct testimony, which provides the information sought in these discovery requests. The information sought by these requests is already in the Complainants’ possession and, therefore, these requests are not reasonably calculated to lead to the discovery of admissible evidence.

39. For these reasons, these interrogatories are repetitive, vague, incomprehensible, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence.

D. OBJECTIONS TO COMPLAINANTS-III-55 THROUGH 72

40. Complainants Set III, Question Nos. 55 through 72:

I-55. In support of PPL's position in the instant case, do PPL and/or the company's expert witnesses assert or make the claim that there is a reliable medical and scientific basis upon which to conclude that chronic, long-term exposure to frequent, day-and-night transmissions of radiofrequency radiation at levels below the FCC RF safety guidelines as a result of the installation of PPL's AMI meters **would not and will not** cause biological or adverse health effects?

1-56. If PPL's answer to 1-55 is in the affirmative, please identify specifically all empirical evidence in the form of actual medical and scientific research studies upon which PPL and the company's expert witnesses rely and will rely in support of such a claim.

I-57. If PPL's answer to 1-55 is in the affirmative, please produce and provide Complainants with copies of all empirical medical and scientific documentation which PPL and the company's expert witnesses rely and will rely upon as evidence in support of such a claim.

I-58. In support of PPL's position in the instant case, do PPL and/or the company's expert witnesses assert or make the claim that there is a reliable medical and scientific basis upon which to conclude that chronic, long-term exposure to frequent, day-and-night transmissions of radiofrequency radiation at levels below the FCC RF safety guidelines as a result of the installation of PPL's AMI meters **could not and cannot** cause biological or adverse health effects?

I-59. If PPL's answer to 1-58 is in the affirmative, please identify specifically all empirical evidence in the form of actual medical and scientific research studies upon which PPL and the company's expert witnesses rely and will rely in support of such a claim.

I-60. If PPL's answer to 1-58 is in the affirmative, please produce and provide Complainants with copies of all empirical medical and scientific documentation which PPL and the company's expert witnesses rely and will rely upon as evidence in support of such a claim.

I-61. In support of PPL's position in the instant case, do PPL and/or the company's expert witnesses assert or make the claim that there is a reliable medical and scientific basis upon which to conclude that chronic, long-term exposure to frequent, day-and-night transmissions of radiofrequency radiation at levels below the FCC RF safety guidelines as a result of the installation of PPL's AMI meters **would not and will not** contribute to biological or adverse health effects?

I-62. If PPL's answer to I-61 is in the affirmative, please identify specifically all empirical evidence in the form of actual medical and scientific research studies upon which PPL and the company's expert witnesses rely and will rely in support of such a claim.

I-63. If PPL's answer to 1-61 is in the affirmative, please produce and provide Complainants with copies of all empirical medical and scientific documentation which PPL and the company's expert witnesses rely and will rely upon as evidence in support of such a claim.

I-64. In support of PPL's position in the instant case, do PPL

and/or the company's expert witnesses assert or make the claim that there is a reliable medical and scientific basis upon which to conclude that chronic, long-term exposure to frequent, day-and-night transmissions of radiofrequency radiation at levels below the FCC RF safety guidelines as a result of the installation of PPL's AMI meters **could not and cannot** contribute to biological or adverse health effects?

I-65. If PPL's answer to 1-64 is in the affirmative, please identify specifically all empirical evidence in the form of actual medical and scientific research studies upon which PPL and the company's expert witnesses rely and will rely in support of such a claim.

I-66. If PPL's answer to 1-64 is in the affirmative, please produce and provide Complainants with copies of all empirical medical and scientific documentation which PPL and the company's expert witnesses rely and will rely upon as evidence in support of such a claim.

I-67. In support of PPL's position in the instant case, do PPL and/or the company's expert witnesses assert or make the claim that there is a reliable medical and scientific basis upon which to conclude that chronic, long-term exposure to frequent, day-and-night transmissions of radiofrequency radiation at levels below the FCC RF safety guidelines as a result of the installation of PPL's AMI meters **would not and will not** exacerbate adverse health effects?

I-68. If PPL's answer to 1-67 is in the affirmative, please identify specifically all empirical evidence in the form of actual medical and scientific research studies upon which PPL and the company's expert witnesses rely and will rely in support of such a claim.

I-69. If PPL's answer to 1-67 is in the affirmative, please produce and provide Complainants with copies of all empirical medical and scientific documentation which PPL and the company's expert witnesses rely and will rely upon as evidence in support of such a claim.

I-70. In support of PPL's position in the instant case, do PPL and/or the company's expert witnesses assert or make the claim that there is a reliable medical and scientific basis upon which to conclude that chronic, long-term exposure to frequent, day-and-night transmissions of radiofrequency radiation at levels below the FCC RF safety guidelines as a result of the installation of PPL's AMI meters **could not and cannot** exacerbate adverse health effects?

I-71. If PPL's answer to 1-70 is in the affirmative, please identify specifically all empirical evidence in the form of actual medical and scientific research studies upon which PPL and the company's expert witnesses rely and will rely in support of such a claim.

I-72. If PPL's answer to 1-70 is in the affirmative, please produce and provide Complainants with copies of all empirical medical and scientific documentation which PPL and the company's expert witnesses rely and will rely upon as evidence in support of such a claim.

41. The Company objects to Complainants-III-55 through 72 on the grounds that the requests are repetitive of prior requests, vague, incomprehensible, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence.

42. These interrogatories are repetitive of prior requests to which PPL Electric has provided responses. For example, PPL Electric objected and responded without waiving its objection to prior discovery requests seeking the bases for the opinions of its expert witnesses. *See, e.g.*, PPL Electric Responses to Holder-II-1 through Holder-II-4. Therein, PPL Electric stated it would provide this information in the written direct testimony of its expert witnesses, in accordance with the litigation schedule established in this case. PPL Electric served written direct testimony on February 28, 2020, and its direct testimony sets forth its position and the scientific and medical opinions of its expert witnesses. Complainants-III-55 through 72 simply ask for information that is already in the Complainants' possession.

43. Moreover, these requests are duplicative of later requests contained in Complainants' Set III. Specifically, Complainants-III-109 through 132 request whether it is PPL Electric's position that there is a reliable medical and scientific basis upon which to conclude that there are no causal mechanisms of interaction which can adversely affect biological systems or health that are exposed to radiofrequency (RF) radiation at levels which are below the FCC's RF safety guidelines by varying, undefined and vague amounts (*e.g.*, "below" vs. "far below") or

whether it is PPL Electric's position that its AMI meters and the radiofrequency waves they emit do not cause, contribute to, or exacerbate adverse health conditions, and ask PPL Electric to identify and provide documents used to support its position. It is unreasonably burdensome and repetitive for PPL Electric provide the same information (which it has already provided) in response to discovery requests seeking the same information but asked different ways.

44. The interrogatories also use a number of vague and undefined terms, such as "levels below," "chronic, long-term exposure," "frequent," and "day-and-night transmission."⁶ Without clarification as to the meaning of these terms, PPL Electric cannot reasonably provide a complete and accurate response.

45. In addition, these interrogatories are based upon a series of complicated compound phrases and sentences, which make responding to the discovery requests unreasonably difficult. For example, the Complainants repeatedly use the phrases, "would not and will not cause biological or adverse health effects," or "could not and cannot cause biological or adverse health effects," or some iteration thereof which exchanges "cause" for "contribute" or "exacerbate."

46. Further, Question Nos. 56, 57, 59, 60, 62, 63, 65, 66, 68, 69, 71 and 72 are unduly burdensome because they request PPL Electric to identify "identify specifically all empirical evidence in the form of actual medical and scientific research studies upon which PPL and the company's expert witnesses rely and will rely" and to "provide Complainants with copies of all empirical medical and scientific documentation which PPL and the company's expert witnesses rely and will rely upon as evidence." PPL Electric's expert witnesses have reviewed hundreds of studies in formulating their expert opinions, and have specifically identified relevant studies in their written direct testimony. It is unduly burdensome for PPL Electric to identify these studies

⁶ See footnote 5 *supra*.

a second time and to produce copies of these studies for the Complainants, where the Complainants can already access copies of the identified studies themselves.

47. Finally, these requests are not reasonably calculated to lead to the discovery of any additional, admissible evidence. PPL Electric has already submitted its written direct testimony, which provides the information sought in these discovery requests. The information sought by these requests is already in the Complainants' possession and, therefore, these requests are not reasonably calculated to lead to the discovery of admissible evidence.

48. For these reasons, these interrogatories are repetitive, vague, incomprehensible, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence.

E. OBJECTIONS TO COMPLAINANTS-III-73 THROUGH 93

49. Complainants Set III, Question Nos. 73 through 93 request:

I-73. In support of PPL's position in the instant case, do PPL and/or the company's expert witnesses assert or make the claim that there is a reliable medical and scientific basis upon which to conclude that chronic, long-term exposure to frequent, day-and-night transmissions of radiofrequency radiation at very low levels (far below the FCC RF safety guidelines) as a result of the installation of PPL's AMI meters **would not and will not** cause biological or adverse health effects?

I-74. If PPL's answer to I-73 is in the affirmative, please identify specifically all empirical evidence in the form of actual medical and scientific research studies upon which PPL and the company's expert witnesses rely and will rely in support of such a claim.

I-75. If PPL's answer to I-73 is in the affirmative, please produce and provide Complainants with copies of all empirical medical and scientific documentation which PPL and the company's expert witnesses rely and will rely upon as evidence in support of such a claim.

I-76. In support of PPL's position in the instant case, do PPL and/or the company's expert witnesses assert or make the claim that there is a reliable medical and scientific basis upon which to

conclude that chronic, long-term exposure to frequent, day-and-night transmissions of radiofrequency radiation at very low levels (far below the FCC RF safety guidelines) as a result of the installation of PPL's AMI meters **could not and cannot** cause biological or adverse health effects?

I-77. If PPL's answer to 1-76 is in the affirmative, please identify specifically all empirical evidence in the form of actual medical and scientific research studies upon which PPL and the company's expert witnesses rely and will rely in support of such a claim.

1-78. If PPL's answer to 1-76 is in the affirmative, please produce and provide Complainants with copies of all empirical medical and scientific documentation which PPL and the company's expert witnesses rely and will rely as evidence in support of such a claim.

I-79. In support of PPL's position in the instant case, do PPL and/or the company's expert witnesses assert or make the claim that there is a reliable medical and scientific basis upon which to conclude that chronic, long-term exposure to frequent, day-and-night transmissions of radiofrequency radiation at very low levels (far below the FCC RF safety guidelines) as a result of the installation of PPL's AMI meters **would not and will not** contribute to biological or adverse health effects?

I-80. If PPL's answer to 1-79 is in the affirmative, please identify specifically all empirical evidence in the form of actual medical and scientific research studies upon which PPL and the company's expert witnesses rely and will rely in support of such a claim.

1-81. If PPL's answer to 1-79 is in the affirmative, please produce and provide Complainants with copies of all empirical medical and scientific documentation which PPL and the company's expert witnesses rely and will rely upon as evidence in support of such a claim.

I-82. In support of PPL's position in the instant case, do PPL and/or the company's expert witnesses assert or make the claim that there is a reliable medical and scientific basis upon which to conclude that chronic, long-term exposure to frequent, day-and-night transmissions of radiofrequency radiation at very low levels (far below the FCC RF safety guidelines) as a result of the installation of PPL's AMI meters **could not and cannot** contribute to biological or adverse health effects?

I-83. If PPL's answer to 1-82 is in the affirmative, please identify specifically all empirical evidence in the form of actual medical

and scientific research studies upon which PPL and the company's expert witnesses rely and will rely in support of such a claim.

I-84. If PPL's answer to 1-82 is in the affirmative, please produce and provide Complainants with copies of all empirical medical and scientific documentation which PPL and the company's expert witnesses rely and will rely upon as evidence in support of such a claim.

I-85. In support of PPL's position in the instant case, do PPL and/or the company's expert witnesses assert or make the claim that there is a reliable medical and scientific basis upon which to conclude that chronic, long-term exposure to frequent, day-and-night transmissions of radiofrequency radiation at very low levels (far below the FCC RF safety guidelines) as a result of the installation of PPL's AMI meters **would not and will not** exacerbate adverse health effects?

I-86. If PPL's answer to 1-85 is in the affirmative, please identify specifically all empirical evidence in the form of actual medical and scientific research studies upon which PPL and the company's expert witnesses rely and will rely in support of such a claim.

I-87. If PPL's answer to 1-85 is in the affirmative, please produce and provide Complainants with copies of all empirical medical and scientific documentation which PPL and the company's expert witnesses rely and will rely upon as evidence in support of such a claim.

I-88. In support of PPL's position in the instant case, do PPL and/or the company's expert witnesses assert or make the claim that there is a reliable medical and scientific basis upon which to conclude that chronic, long-term exposure to frequent, day-and-night transmissions of radiofrequency radiation at very low levels (far below the FCC RF safety guidelines) as a result of the installation of PPL's AMI meters **could not and cannot** exacerbate adverse health effects?

I-89. If PPL's answer to 1-88 is in the affirmative, please identify specifically all empirical evidence in the form of actual medical and scientific research studies upon which PPL and the company's expert witnesses rely and will rely in support of such a claim.

I-90. If PPL's answer to 1-88 is in the affirmative, please produce and provide Complainants with copies of all empirical medical and scientific documentation which PPL and the company's expert witnesses rely and will rely upon as evidence in support of such a

claim.

I-91. In support of PPL's position in the instant case, do PPL and/or the company's expert witnesses assert or make the claim that there is a reliable medical and scientific basis upon which to conclude that chronic, long-term exposure to radiofrequency (RF) fields produced as a result of the installation of PPL's automated metering infrastructure ("AMI") meters **would not and will not** cause biological or adverse health effects?

I-92. If PPL's answer to 1-91 is in the affirmative, please identify specifically all empirical evidence in the form of actual medical and scientific research studies upon which PPL and the company's expert witnesses rely and will rely in support of such a claim.

I-93. If PPL's answer to 1-91 is in the affirmative, please produce and provide Complainants with copies of all empirical medical and scientific documentation which PPL and the company's expert witnesses rely and will rely upon as evidence in support of such a claim

50. The Company objects to Complainants-III-73 through 93 on the grounds that the requests are repetitive of prior requests, vague, incomprehensible, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence.

51. These interrogatories are repetitive of prior requests to which PPL Electric has provided responses. For example, PPL Electric objected and responded without waiving its objection to prior discovery requests seeking the bases for the opinions of its expert witnesses. *See, e.g.*, PPL Electric Responses to Holder-II-1 through Holder-II-4. Therein, PPL Electric stated it would provide this information in the written direct testimony of its expert witnesses, in accordance with the litigation schedule established in this case. PPL Electric served written direct testimony on February 28, 2020, and its direct testimony sets forth its position and the scientific and medical opinions of its expert witnesses. Complainants-III-73 through 93 simply ask for information that is already in the Complainants' possession.

52. Moreover, these requests are duplicative of later requests contained in

Complainants' Set III. Specifically, Complainants-III-109 through 132 request whether it is PPL Electric's position that there is a reliable medical and scientific basis upon which to conclude that there are no causal mechanisms of interaction which can adversely affect biological systems or health that are exposed to radiofrequency (RF) radiation at levels which are below the FCC's RF safety guidelines by varying, undefined and vague amounts (*e.g.*, "below" vs. "far below") or whether it is PPL Electric's position that its AMI meters and the radiofrequency waves they emit do not cause, contribute to, or exacerbate adverse health conditions, and ask PPL Electric to identify and provide documents used to support its position. It is unreasonably burdensome and repetitive for PPL Electric provide the same information (which it has already provided) in response to discovery requests seeking the same information but asked different ways.

53. The interrogatories also use a number of vague and undefined terms, such as "levels far below," "chronic, long-term exposure," "frequent," and "day-and-night transmission."⁷ Without clarification as to the meaning of these terms, PPL Electric cannot reasonably provide a complete and accurate response.

54. In addition, these interrogatories are based upon a series of complicated compound phrases and sentences, which make responding to the discovery requests unreasonably difficult. For example, the Complainants repeatedly use the phrases, "would not and will not cause biological or adverse health effects," or "could not and cannot cause biological or adverse health effects," or some iteration thereof which exchanges "cause" for "contribute" or "exacerbate."

55. Further, Question Nos. 74, 75, 77, 78, 80, 81, 83, 84, 86, 87, 89, 90, 92 and 93 are unduly burdensome because they request PPL Electric to identify "identify specifically all empirical evidence in the form of actual medical and scientific research studies upon which PPL

⁷ See footnote 5 *supra*.

and the company's expert witnesses rely and will rely” and to “provide Complainants with copies of all empirical medical and scientific documentation which PPL and the company's expert witnesses rely and will rely upon as evidence.” PPL Electric’s expert witnesses have reviewed hundreds of studies in formulating their expert opinions, and have specifically identified relevant studies in their written direct testimony. It is unduly burdensome for PPL Electric to identify these studies a second time and to produce copies of these studies for the Complainants, where the Complainants can already access copies of the identified studies themselves.

56. Finally, these requests are not reasonably calculated to lead to the discovery of any additional, admissible evidence. PPL Electric has already submitted its written direct testimony, which provides the information sought in these discovery requests. The information sought by these requests is already in the Complainants’ possession and, therefore, these requests are not reasonably calculated to lead to the discovery of admissible evidence.

57. For these reasons, these interrogatories are repetitive, vague, incomprehensible, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence.

F. OBJECTIONS TO COMPLAINANTS-III-94 THROUGH 108

58. Complainants Set III, Question Nos. 94 through 108 request:

I-94. In support of PPL's position in the instant case, do PPL and/or the company's expert witnesses assert or make the claim that there is a reliable medical and scientific basis upon which to conclude that chronic, long-term exposure to radiofrequency (RF) fields produced as a result of the installation of PPL's automated metering infrastructure ("AMI") meters **could not and cannot** cause biological or adverse health effects?

I-95. If PPL's answer to 1-94 is in the affirmative, please identify specifically all empirical evidence in the form of actual medical and scientific research studies upon which PPL and the company's expert witnesses rely and will rely in support of such a claim

I-96. If PPL's answer to 1-94 is in the affirmative, please produce and provide Complainants with copies of all empirical medical and scientific documentation which PPL and the company's expert witnesses rely and will rely upon as evidence in support of such a claim.

I-97. In support of PPL's position in the instant case, do PPL and/or the company's expert witnesses assert or make the claim that there is a reliable medical and scientific basis upon which to conclude that chronic, long-term exposure to radiofrequency (RF) fields produced as a result of the installation of PPL's automated metering infrastructure ("AMI") meters **would not and will not** contribute to biological or adverse health effects?

I-98. If PPL's answer to 1-97 is in the affirmative, please identify specifically all empirical evidence in the form of actual medical and scientific research studies upon which PPL and the company's expert witnesses rely and will rely in support of such a claim.

I-99. If PPL's answer to 1-97 is in the affirmative, please produce and provide Complainants with copies of all empirical medical and scientific documentation which PPL and the company's expert witnesses rely and will rely upon as evidence in support of such a claim.

I-100. In support of PPL's position in the instant case, do PPL and/or the company's expert witnesses assert or make the claim that there is a reliable medical and scientific basis upon which to conclude that chronic, long-term exposure to radiofrequency (RF) fields produced as a result of the installation of PPL's automated metering infrastructure ("AMI") meters **could not and cannot** contribute to biological or adverse health effects?

I-101. If PPL's answer to I-100 is in the affirmative, please identify specifically all empirical evidence in the form of actual medical and scientific research studies upon which PPL and the company's expert witnesses rely and will rely in support of such a claim.

I-102. If PPL's answer to I-100 is in the affirmative, please produce and provide Complainants with copies of all empirical medical and scientific documentation which PPL and the company's expert witnesses rely and will rely upon as evidence in support of such a claim.

I-103. In support of PPL's position in the instant case, do PPL and/or the company's expert witnesses assert or make the claim that there is a reliable medical and scientific basis upon which to

conclude that chronic, long-term exposure to radiofrequency (RF) fields produced as a result of the installation of PPL's automated metering infrastructure ("AMI") meters **would not and will not** exacerbate adverse health effects?

I-104. If PPL's answer to 1-103 is in the affirmative, please identify specifically all empirical evidence in the form of actual medical and scientific research studies upon which PPL and the company's expert witnesses rely and will rely in support of such a claim.

I-105. If PPL's answer to 1-103 is in the affirmative, please produce and provide Complainants with copies of all empirical medical and scientific documentation which PPL and the company's expert witnesses rely and will rely upon as evidence in support of such a claim.

I-106. In support of PPL's position in the instant case, do PPL and/or the company's expert witnesses assert or make the claim that there is a reliable medical and scientific basis upon which to conclude that chronic, long-term exposure to radiofrequency (RF) fields produced as a result of the installation of PPL's automated metering infrastructure ("AMP) meters **could not and cannot** exacerbate adverse health effects?

I-107. If PPL's answer to 1-106 is in the affirmative, please identify specifically all empirical evidence in the form of actual medical and scientific research studies upon which PPL and the company's expert witnesses rely and will rely in support of such a claim.

I-108. If PPL's answer to 1-106 is in the affirmative, please produce and provide Complainants with copies of all empirical medical and scientific documentation which PPL and the company's expert witnesses rely and will rely upon as evidence in support of such a claim.

59. The Company objects to Complainants-III-94 through 108 on the grounds that the requests are repetitive of prior requests, vague, incomprehensible, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence.

60. These interrogatories are repetitive of prior requests to which PPL Electric has provided responses. For example, PPL Electric objected and responded without waiving its

objection to prior discovery requests seeking the bases for the opinions of its expert witnesses. *See, e.g.*, PPL Electric Responses to Holder-II-1 through Holder-II-4. Therein, PPL Electric stated it would provide this information in the written direct testimony of its expert witnesses, in accordance with the litigation schedule established in this case. PPL Electric served written direct testimony on February 28, 2020, and its direct testimony sets forth its position and the scientific and medical opinions of its expert witnesses. Complainants-III-94 through 108 simply ask for information that is already in the Complainants' possession.

61. Moreover, these requests are duplicative of later requests contained in Complainants' Set III. Specifically, Complainants-III-109 through 132 request whether it is PPL Electric's position that there is a reliable medical and scientific basis upon which to conclude that there are no causal mechanisms of interaction which can adversely affect biological systems or health that are exposed to radiofrequency (RF) radiation at levels which are below the FCC's RF safety guidelines by varying, undefined and vague amounts (*e.g.*, "below" vs. "far below") or whether it is PPL Electric's position that its AMI meters and the radiofrequency waves they emit do not cause, contribute to, or exacerbate adverse health conditions, and ask PPL Electric to identify and provide documents used to support its position. It is unreasonably burdensome and repetitive for PPL Electric provide the same information (which it has already provided) in response to discovery requests seeking the same information but asked different ways.

62. The interrogatories also use a number of vague and undefined terms, such as "chronic, long-term exposure." Without clarification as to the meaning of this term, PPL Electric cannot reasonably provide a complete and accurate response.

63. In addition, these interrogatories are based upon a series of complicated compound phrases and sentences, which make responding to the discovery requests

unreasonably difficult. For example, the Complainants repeatedly use the phrases, “would not and will not cause biological or adverse health effects,” or “could not and cannot cause biological or adverse health effects,” or some iteration thereof which exchanges “cause” for “contribute” or “exacerbate.”

64. Further, Question Nos. 95, 96, 98, 99, 101, 102, 104, 105, 107 and 108 are unduly burdensome because they request PPL Electric to “identify specifically all empirical evidence in the form of actual medical and scientific research studies upon which PPL and the company's expert witnesses rely and will rely” and to “provide Complainants with copies of all empirical medical and scientific documentation which PPL and the company's expert witnesses rely and will rely upon as evidence.” PPL Electric’s expert witnesses have reviewed hundreds of studies in formulating their expert opinions, and have specifically identified relevant studies in their written direct testimony. It is unduly burdensome for PPL Electric to identify these studies a second time and to produce copies of these studies for the Complainants, where the Complainants can already access copies of the identified studies themselves.

65. Finally, these requests are not reasonably calculated to lead to the discovery of any additional, admissible evidence. PPL Electric has already submitted its written direct testimony, which provides the information sought in these discovery requests. The information sought by these requests is already in the Complainants’ possession and, therefore, these requests are not reasonably calculated to lead to the discovery of admissible evidence.

66. For these reasons, these interrogatories are repetitive, vague, incomprehensible, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence.

G. OBJECTIONS TO COMPLAINANTS-III-109 THROUGH 120

67. Complainants Set III, Question Nos. 109 through 120 request:

I-109. Do PPL and/or the company's expert witnesses assert or make the claim that there is a reliable medical and scientific basis upon which to conclude that there are no causal mechanisms of interaction which can affect biological systems that are exposed to radiofrequency (RF) radiation at levels which are below the FCC's RF safety guidelines?

I-110. If PPL's answer to 1-109 is in the affirmative, please identify specifically all empirical evidence in the form of actual medical and scientific research studies upon which PPL and the company's expert witnesses rely and will rely in support of such a claim.

I-111. If PPL's answer to 1-109 is in the affirmative, please produce and provide Complainants with copies of all empirical medical and scientific documentation which PPL and the company's expert witnesses rely and will rely upon as evidence in support of such a claim.

I-112. Do PPL and/or the company's expert witnesses assert or make the claim that there is a reliable medical and scientific basis upon which to conclude that there are no causal mechanisms of interaction which can affect biological systems that are exposed to radiofrequency (RF) fields at levels which are below the FCC's RF safety guidelines?

I-113. If PPL's answer to 1-112 is in the affirmative, please identify specifically all empirical evidence in the form of actual medical and scientific research studies upon which PPL and the company's expert witnesses rely and will rely in support of such a claim.

I-114. If PPL's answer to 1-112 is in the affirmative, please produce and provide Complainants with copies of all empirical medical and scientific documentation which PPL and the company's expert witnesses rely and will rely upon as evidence in support of such a claim.

I-115. Do PPL and/or the company's expert witnesses assert or make the claim that there is a reliable medical and scientific basis upon which to conclude that there are no causal mechanisms of interaction which can adversely affect biological systems that are exposed to radiofrequency (RF) radiation at levels which are below the FCC's RF safety guidelines?

I-116. If PPL's answer to 1-115 is in the affirmative, please identify specifically all empirical evidence in the form of actual

medical and scientific research studies upon which PPL and the company's expert witnesses rely and will rely in support of such a claim.

I-117. If PPL's answer to 1-115 is in the affirmative, please produce and provide Complainants with copies of all empirical medical and scientific documentation which PPL and the company's expert witnesses rely and will rely upon as evidence in support of such a claim.

I-118. Do PPL and/or the company's expert witnesses assert or make the claim that there is a reliable medical and scientific basis upon which to conclude that there are no causal mechanisms of interaction which can adversely affect biological systems that are exposed to radiofrequency (RF) fields at levels which are below the FCC's RF safety guidelines?

I-119. If PPL's answer to 1-118 is in the affirmative, please identify specifically all empirical evidence in the form of actual medical and scientific research studies upon which PPL and the company's expert witnesses rely and will rely in support of such a claim.

I-120. If PPL's answer to 1-118 is in the affirmative, please produce and provide Complainants with copies of all empirical medical and scientific documentation which PPL and the company's expert witnesses rely and will rely upon as evidence in support of such a claim.

68. The Company objects to Complainants-III-109 through 120 on the grounds that the requests are repetitive of prior requests, vague, incomprehensible, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence.

69. These interrogatories are repetitive of prior requests to which PPL Electric has provided responses. For example, PPL Electric objected and responded without waiving its objection to prior discovery requests seeking the bases for the opinions of its expert witnesses. *See, e.g.,* PPL Electric Responses to Holder-II-1 through Holder-II-4. Therein, PPL Electric stated it would provide this information in the written direct testimony of its expert witnesses, in accordance with the litigation schedule established in this case. PPL Electric served written

direct testimony on February 28, 2020, and its direct testimony sets forth its position and the scientific and medical opinions of its expert witnesses. Complainants-III-109 through 120 simply ask for information that is already in the Complainants' possession.

70. Moreover, as noted above, these requests are duplicative of prior requests contained in Complainants' Set III. Essentially, these requests once again ask for PPL Electric to confirm the medical and scientific opinions of its witnesses, and ask PPL Electric to identify and provide documents used to support its position, which are all set forth in the Company's direct testimony. It is unreasonably burdensome and repetitive for PPL Electric provide the same information (which it has already provided) in response to discovery requests seeking the same information but asked different ways.

71. The interrogatories also use a number of vague and undefined terms and phrases, such as "causal mechanisms of interaction," "exposed," "levels which are below," and "biological systems." Without clarification as to the meaning of these terms, PPL Electric cannot reasonably provide a complete and accurate response.

72. Further, Question Nos. 110, 111, 113, 114, 116, 117, 119 and 120 are unduly burdensome because they request PPL Electric to "identify specifically all empirical evidence in the form of actual medical and scientific research studies upon which PPL and the company's expert witnesses rely and will rely" and to "provide Complainants with copies of all empirical medical and scientific documentation which PPL and the company's expert witnesses rely and will rely upon as evidence." PPL Electric's expert witnesses have reviewed hundreds of studies in formulating their expert opinions, and have specifically identified relevant studies in their written direct testimony. It is unduly burdensome for PPL Electric to identify these studies a second time and to produce copies of these studies for the Complainants, where the

Complainants can already access copies of the identified studies themselves.

73. Finally, these requests are not reasonably calculated to lead to the discovery of any additional, admissible evidence. PPL Electric has already submitted its written direct testimony, which provides the information sought in these discovery requests. The information sought by these requests is already in the Complainants' possession and, therefore, these requests are not reasonably calculated to lead to the discovery of admissible evidence.

74. For these reasons, these interrogatories are repetitive, vague, incomprehensible, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence.

H. OBJECTIONS TO COMPLAINANTS-III-121 THROUGH 126

75. Complainants Set III, Question Nos. 121 through 126 request:

I-121. Do PPL and/or the company's expert witnesses assert or make the claim that there is a reliable medical and scientific basis upon which to conclude that exposure to radiofrequency (RF) radiation at levels which are below the FCC's RF safety guidelines is without risk of biological effects?

I-122. If PPL's answer to 1-121 is in the affirmative, please identify specifically all empirical evidence in the form of actual medical and scientific research studies upon which PPL and the company's expert witnesses rely and will rely in support of such a claim.

I-123. If PPL's answer to 1-121 is in the affirmative, please produce and provide Complainants with copies of all empirical medical and scientific documentation which PPL and the company's expert witnesses rely and will rely upon as evidence in support of such a claim.

I-124. Do PPL and/or the company's expert witnesses assert or make the claim that there is a reliable medical and scientific basis upon which to conclude that exposure to radiofrequency (RF) radiation at levels which are below the FCC's RF safety guidelines is without risk of adverse health effects?

I-125. If PPL's answer to 1-124 is in the affirmative, please

identify specifically all empirical evidence in the form of actual medical and scientific research studies upon which PPL and the company's expert witnesses rely and will rely in support of such a claim.

I-126. If PPL's answer to 1-124 is in the affirmative, please produce and provide Complainants with copies of all empirical medical and scientific documentation which PPL and the company's expert witnesses rely and will rely upon as evidence in support of such a claim.

76. The Company objects to Complainants-III-121 through 126 on the grounds that the requests are repetitive of prior requests, vague, incomprehensible, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence.

77. These interrogatories are repetitive of prior requests to which PPL Electric has provided responses. For example, PPL Electric objected and responded, without waiving its objection, to prior discovery requests seeking the bases for the opinions of its expert witnesses. *See, e.g.*, PPL Electric Responses to Holder-II-1 through Holder-II-4. Therein, PPL Electric stated it would provide this information in the written direct testimony of its expert witnesses, in accordance with the litigation schedule established in this case. PPL Electric served written direct testimony on February 28, 2020, and its direct testimony sets forth its position and the scientific and medical opinions of its expert witnesses. Complainants-III-121 through 126 simply ask for information that is already in the Complainants' possession.

78. Moreover, as noted above, these requests are duplicative of prior requests contained in Complainants' Set III. Essentially, these requests once again ask for PPL Electric to confirm the medical and scientific opinions of its witnesses, and ask PPL Electric to identify and provide documents used to support its position, which are all set forth in the Company's direct testimony. It is unreasonably burdensome and repetitive for PPL Electric provide the same information (which it has already provided) in response to discovery requests seeking the same

information but asked different ways.

79. The interrogatories also use a number of vague and undefined terms and phrases, such as “exposure,” “levels which are below,” “without risk,” and “biological effects,” and “adverse health effects.” Without clarification as to the meaning of these terms, PPL Electric cannot reasonably provide a complete and accurate response.

80. Further, Question Nos. 122, 123, 125 and 126 are unduly burdensome because they request PPL Electric to “identify specifically all empirical evidence in the form of actual medical and scientific research studies upon which PPL and the company's expert witnesses rely and will rely” and to “provide Complainants with copies of all empirical medical and scientific documentation which PPL and the company's expert witnesses rely and will rely upon as evidence.” PPL Electric’s expert witnesses have reviewed hundreds of studies in formulating their expert opinions, and have specifically identified relevant studies in their written direct testimony. It is unduly burdensome for PPL Electric to identify these studies a second time and to produce copies of these studies for the Complainants, where the Complainants can already access copies of the identified studies themselves.

81. Finally, these requests are not reasonably calculated to lead to the discovery of any additional, admissible evidence. PPL Electric has already submitted its written direct testimony, which provides the information sought in these discovery requests. The information sought by these requests is already in the Complainants’ possession and, therefore, these requests are not reasonably calculated to lead to the discovery of admissible evidence.

82. For these reasons, these interrogatories are repetitive, vague, incomprehensible, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence.

I. OBJECTIONS TO COMPLAINANTS-III-127 THROUGH 132

83. Complainants Set III, Question Nos. 127 through 132 request:

I-127. Do PPL and/or the company's expert witnesses assert or make the claim that there is a reliable medical and scientific basis upon which to conclude that exposure to radiofrequency (RF) radiation at levels which are far below the FCC's RF safety guidelines is without risk of biological effects?

I-128. If PPL's answer to 1-127 is in the affirmative, please identify specifically all empirical evidence in the form of actual medical and scientific research studies upon which PPL and the company's expert witnesses rely and will rely in support of such a claim.

I-129. If PPL's answer to 1-127 is in the affirmative, please produce and provide Complainants with copies of all empirical medical and scientific documentation which PPL and the company's expert witnesses rely and will rely upon as evidence in support of such a claim.

I-130. Do PPL and/or the company's expert witnesses assert or make the claim that there is a reliable medical and scientific basis upon which to conclude that exposure to radiofrequency (RF) radiation at levels which are far below the FCC's RF safety guidelines is without risk of adverse health effects?

I-131. If PPL's answer to 1-130 is in the affirmative, please identify specifically all empirical evidence in the form of actual medical and scientific research studies upon which PPL and the company's expert witnesses rely and will rely in support of such a claim.

I-132. If PPL's answer to 1-130 is in the affirmative, please produce and provide Complainants with copies of all empirical medical and scientific documentation which PPL and the company's expert witnesses rely and will rely upon as evidence in support of such a claim.

84. The Company objects to Complainants-III-127 through 132 on the grounds that the requests are repetitive of prior requests, vague, incomprehensible, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence.

85. These interrogatories are repetitive of prior requests to which PPL Electric has

provided responses. For example, PPL Electric objected and responded, without waiving its objection, to prior discovery requests seeking the bases for the opinions of its expert witnesses. *See, e.g.*, PPL Electric Responses to Holder-II-1 through Holder-II-4. Therein, PPL Electric stated it would provide this information in the written direct testimony of its expert witnesses, in accordance with the litigation schedule established in this case. PPL Electric served written direct testimony on February 28, 2020, and its direct testimony sets forth its position and the scientific and medical opinions of its expert witnesses. Complainants-III-127 through 132 simply ask for information that is already in the Complainants' possession.

86. Moreover, as noted above, these requests are duplicative of prior requests contained in Complainants' Set III. Essentially, these requests once again ask for PPL Electric to confirm the medical and scientific opinions of its witnesses, and ask PPL Electric to identify and provide documents used to support its position, which are all set forth in the Company's direct testimony. It is unreasonably burdensome and repetitive for PPL Electric provide the same information (which it has already provided) in response to discovery requests seeking the same information but asked different ways.

87. The interrogatories also use a number of vague and undefined terms and phrases, such as "exposure," "levels which are far below," "without risk," "biological effects," and "adverse health effects." Without clarification as to the meaning of these terms, PPL Electric cannot reasonably provide a complete and accurate response.

88. Further, Question Nos. 128, 129, 131, 132 are unduly burdensome because they request PPL Electric to "identify specifically all empirical evidence in the form of actual medical and scientific research studies upon which PPL and the company's expert witnesses rely and will rely" and to "provide Complainants with copies of all empirical medical and scientific

documentation which PPL and the company's expert witnesses rely and will rely upon as evidence.” PPL Electric’s expert witnesses have reviewed hundreds of studies in formulating their expert opinions, and have specifically identified relevant studies in their written direct testimony. It is unduly burdensome for PPL Electric to identify these studies a second time and to produce copies of these studies for the Complainants, where the Complainants can already access copies of the identified studies themselves.

89. Finally, these requests are not reasonably calculated to lead to the discovery of any additional, admissible evidence. PPL Electric has already submitted its written direct testimony, which provides the information sought in these discovery requests. The information sought by these requests is already in the Complainants’ possession and, therefore, these requests are not reasonably calculated to lead to the discovery of admissible evidence.

90. For these reasons, these interrogatories are repetitive, vague, incomprehensible, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence.

J. OBJECTIONS TO COMPLAINANTS-III-133 THROUGH 138

91. Complainants Set III, Question Nos. 133 through 138 request:

I-133. Do PPL and/or the company's expert witnesses assert or make the claim that there is a reliable medical and scientific basis upon which to conclude that exposure to radiofrequency (RF) radiation at levels produced by PPL's AMI smart meter devices is without risk of biological effects?

I-134. If PPL's answer to 1-133 is in the affirmative, please identify specifically all empirical evidence in the form of actual medical and scientific research studies upon which PPL and the company's expert witnesses rely and will rely in support of such a claim.

I-135. If PPL's answer to 1-133 is in the affirmative, please produce and provide Complainants with copies of all empirical medical and scientific documentation which PPL and the

company's expert witnesses rely and will rely upon as evidence in support of such a claim.

I-136. Do PPL and/or the company's expert witnesses assert or make the claim that there is a reliable medical and scientific basis upon which to conclude that exposure to radiofrequency (RF) radiation at levels produced by PPL's AMI smart meter devices is without risk of adverse health effects?

I-137. If PPL's answer to 1-136 is in the affirmative, please identify specifically all empirical evidence in the form of actual medical and scientific research studies upon which PPL and the company's expert witnesses rely and will rely in support of such a claim.

I-138. If PPL's answer to 1-136 is in the affirmative, please produce and provide Complainants with copies of all empirical medical and scientific documentation which PPL and the company's expert witnesses rely and will rely upon as evidence in support of such a claim.

92. The Company objects to Complainants-III-133 through 138 on the grounds that the requests are repetitive of prior requests, vague, incomprehensible, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence.

93. These interrogatories are repetitive of prior requests to which PPL Electric has provided responses. For example, PPL Electric objected and responded, without waiving its objection, to prior discovery requests seeking the bases for the opinions of its expert witnesses. *See, e.g.,* PPL Electric Responses to Holder-II-1 through Holder-II-4. Therein, PPL Electric stated it would provide this information in the written direct testimony of its expert witnesses, in accordance with the litigation schedule established in this case. PPL Electric served written direct testimony on February 28, 2020, and its direct testimony sets forth its position and the scientific and medical opinions of its expert witnesses. Complainants-III-133 through 138 simply ask for information that is already in the Complainants' possession.

94. Moreover, as noted above, these requests are duplicative of prior requests

contained in Complainants' Set III. Essentially, these requests once again ask for PPL Electric to confirm the medical and scientific opinions of its witnesses, and ask PPL Electric to identify and provide documents used to support its position, which are all set forth in the Company's direct testimony. It is unreasonably burdensome and repetitive for PPL Electric provide the same information (which it has already provided) in response to discovery requests seeking the same information but asked different ways.

95. The interrogatories also use a number of vague and undefined terms and phrases, such as "exposure," "without risk," "biological effects," and "adverse health effects." Without clarification as to the meaning of these terms, PPL Electric cannot reasonably provide a complete and accurate response.

96. Further, Question Nos. 134, 135, 137 and 138 are unduly burdensome because they request PPL Electric to "identify specifically all empirical evidence in the form of actual medical and scientific research studies upon which PPL and the company's expert witnesses rely and will rely" and to "provide Complainants with copies of all empirical medical and scientific documentation which PPL and the company's expert witnesses rely and will rely upon as evidence." PPL Electric's expert witnesses have reviewed hundreds of studies in formulating their expert opinions, and have specifically identified relevant studies in their written direct testimony. It is unduly burdensome for PPL Electric to identify these studies a second time and to produce copies of these studies for the Complainants, where the Complainants can already access copies of the identified studies themselves.

97. Finally, these requests are not reasonably calculated to lead to the discovery of any additional, admissible evidence. PPL Electric has already submitted its written direct testimony, which provides the information sought in these discovery requests. The information

sought by these requests is already in the Complainants' possession and, therefore, these requests are not reasonably calculated to lead to the discovery of admissible evidence.

98. For these reasons, these interrogatories are repetitive, vague, incomprehensible, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence.

K. OBJECTIONS TO COMPLAINANTS-III-139 THROUGH 144

99. Complainants Set III, Question Nos. 139 through 144 request:

I-139. Do PPL and/or the company's expert witnesses assert or make the claim that there is a reliable medical and scientific basis upon which to conclude that exposure to modulated radiofrequency (RF) radiation at levels produced by PPL's AMI smart meter devices is without risk of biological effects?

I-140. If PPL's answer to 1-139 is in the affirmative, please identify specifically all empirical evidence in the form of actual medical and scientific research studies upon which PPL and the company's expert witnesses rely and will rely in support of such a claim.

I-141. If PPL's answer to 1-139 is in the affirmative, please produce and provide Complainants with copies of all empirical medical and scientific documentation which PPL and the company's expert witnesses rely and will rely upon as evidence in support of such a claim.

I-142. Do PPL and/or the company's expert witnesses assert or make the claim that there is a reliable medical and scientific basis upon which to conclude that exposure to modulated radiofrequency (RF) radiation at levels produced by PPL's AMI smart meter devices is without risk of adverse health effects?

I-143. If PPL's answer to 1-142 is in the affirmative, please identify specifically all empirical evidence in the form of actual medical and scientific research studies upon which PPL and the company's expert witnesses rely and will rely in support of such a claim.

I-144. If PPL's answer to 1-142 is in the affirmative, please produce and provide Complainants with copies of all empirical medical and scientific documentation which PPL and the

company's expert witnesses rely and will rely upon as evidence in support of such a claim.

100. The Company objects to Complainants-III-139 through 144 on the grounds that the requests are repetitive of prior requests, vague, incomprehensible, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence.

101. These interrogatories are repetitive of prior requests to which PPL Electric has provided responses. For example, PPL Electric objected and responded, without waiving its objection, to prior discovery requests seeking the bases for the opinions of its expert witnesses. *See, e.g.*, PPL Electric Responses to Holder-II-1 through Holder-II-4. Therein, PPL Electric stated it would provide this information in the written direct testimony of its expert witnesses, in accordance with the litigation schedule established in this case. PPL Electric served written direct testimony on February 28, 2020, and its direct testimony sets forth its position and the scientific and medical opinions of its expert witnesses. Complainants-III-139 through 144 simply ask for information that is already in the Complainants' possession.

102. Moreover, as noted above, these requests are duplicative of prior requests contained in Complainants' Set III. Essentially, these requests once again ask for PPL Electric to confirm the medical and scientific opinions of its witnesses, and ask PPL Electric to identify and provide documents used to support its position, which are all set forth in the Company's direct testimony. It is unreasonably burdensome and repetitive for PPL Electric provide the same information (which it has already provided) in response to discovery requests seeking the same information but asked different ways.

103. The interrogatories also use a number of vague and undefined terms and phrases, such as "exposure," "modulated radiofrequency (RF) radiation," "without risk," "biological effects," and "adverse health effects." Without clarification as to the meaning of these terms,

PPL Electric cannot reasonably provide a complete and accurate response.

104. Further, Question Nos. 140, 141, 143 and 144 are unduly burdensome because they request PPL Electric to “identify specifically all empirical evidence in the form of actual medical and scientific research studies upon which PPL and the company's expert witnesses rely and will rely” and to “provide Complainants with copies of all empirical medical and scientific documentation which PPL and the company's expert witnesses rely and will rely upon as evidence.” PPL Electric’s expert witnesses have reviewed hundreds of studies in formulating their expert opinions, and have specifically identified relevant studies in their written direct testimony. It is unduly burdensome for PPL Electric to identify these studies a second time and to produce copies of these studies for the Complainants, where the Complainants can already access copies of the identified studies themselves.

105. Finally, these requests are not reasonably calculated to lead to the discovery of any additional, admissible evidence. PPL Electric has already submitted its written direct testimony, which provides the information sought in these discovery requests. The information sought by these requests is already in the Complainants’ possession and, therefore, these requests are not reasonably calculated to lead to the discovery of admissible evidence.

106. For these reasons, these interrogatories are repetitive, vague, incomprehensible, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence.

L. OBJECTIONS TO COMPLAINANTS-III-145 THROUGH 150

107. Complainants Set III, Question Nos. 145 through 150 request:

I-145. Do PPL and/or the company's expert witnesses assert or make the claim that there is a reliable medical and scientific basis upon which to conclude that exposure to pulsed wave transmissions of radiofrequency (RF) radiation at levels produced by PPL's AMI smart meter devices is without risk of biological

effects?

I-146. If PPL's answer to 1-145 is in the affirmative, please identify specifically all empirical evidence in the form of actual medical and scientific research studies upon which PPL and the company's expert witnesses rely and will rely in support of such a claim.

I-147. If PPL's answer to 1-145 is in the affirmative, please produce and provide Complainants with copies of all empirical medical and scientific documentation which PPL and the company's expert witnesses rely and will rely upon as evidence in support of such a claim.

I-148. Do PPL and/or the company's expert witnesses assert or make the claim that there is a reliable medical and scientific basis upon which to conclude that exposure to pulsed wave transmissions of radiofrequency (RF) radiation at levels produced by PPL's AMI smart meter devices is without risk of adverse health effects?

I-149. If PPL's answer to 1-148 is in the affirmative, please identify specifically all empirical evidence in the form of actual medical and scientific research studies upon which PPL and the company's expert witnesses rely and will rely in support of such a claim.

I-150. If PPL's answer to 1-148 is in the affirmative, please produce and provide Complainants with copies of all empirical medical and scientific documentation which PPL and the company's expert witnesses rely and will rely upon as evidence in support of such a claim.

108. The Company objects to Complainants-III-145 through 150 on the grounds that the requests are repetitive of prior requests, vague, incomprehensible, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence.

109. These interrogatories are repetitive of prior requests to which PPL Electric has provided responses. For example, PPL Electric objected and responded, without waiving its objection, to prior discovery requests seeking the bases for the opinions of its expert witnesses. *See, e.g.*, PPL Electric Responses to Holder-II-1 through Holder-II-4. Therein, PPL Electric

stated it would provide this information in the written direct testimony of its expert witnesses, in accordance with the litigation schedule established in this case. PPL Electric served written direct testimony on February 28, 2020, and its direct testimony sets forth its position and the scientific and medical opinions of its expert witnesses. Complainants-III-151 through 156 simply ask for information that is already in the Complainants' possession.

110. Moreover, as noted above, these requests are duplicative of prior requests contained in Complainants' Set III. Essentially, these requests once again ask for PPL Electric to confirm the medical and scientific opinions of its witnesses, and ask PPL Electric to identify and provide documents used to support its position, which are all set forth in the Company's direct testimony. It is unreasonably burdensome and repetitive for PPL Electric provide the same information (which it has already provided) in response to discovery requests seeking the same information but asked different ways.

111. The interrogatories also use a number of vague and undefined terms and phrases, such as "exposure," "pulsed wave transmissions of radiofrequency (RF) radiation," "without risk," "biological effects," and "adverse health effects." Without clarification as to the meaning of these terms, PPL Electric cannot reasonably provide a complete and accurate response.

112. Further, Question Nos. 146, 147, 149 and 150 are unduly burdensome because they request PPL Electric to "identify specifically all empirical evidence in the form of actual medical and scientific research studies upon which PPL and the company's expert witnesses rely and will rely" and to "provide Complainants with copies of all empirical medical and scientific documentation which PPL and the company's expert witnesses rely and will rely upon as evidence." PPL Electric's expert witnesses have reviewed hundreds of studies in formulating their expert opinions, and have specifically identified relevant studies in their written direct

testimony. It is unduly burdensome for PPL Electric to identify these studies a second time and to produce copies of these studies for the Complainants, where the Complainants can already access copies of the identified studies themselves.

113. Finally, these requests are not reasonably calculated to lead to the discovery of any additional, admissible evidence. PPL Electric has already submitted its written direct testimony, which provides the information sought in these discovery requests. The information sought by these requests is already in the Complainants' possession and, therefore, these requests are not reasonably calculated to lead to the discovery of admissible evidence.

114. For these reasons, these interrogatories are repetitive, vague, incomprehensible, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence.

M. OBJECTIONS TO COMPLAINANTS-III-151 THROUGH 156

115. Complainants Set III, Question Nos. 151 through 156 request:

I-151. Do PPL and/or the company's expert witnesses assert or make the claim that there is a reliable medical and scientific basis upon which to conclude that exposure to radiofrequency (RF) fields at levels produced by PPL's AMI smart meter devices is without risk of biological effects?

I-152. If PPL's answer to 1-151 is in the affirmative, please identify specifically all empirical evidence in the form of actual medical and scientific research studies upon which PPL and the company's expert witnesses rely and will rely in support of such a claim.

I-153. If PPL's answer to 1-151 is in the affirmative, please produce and provide Complainants with copies of all empirical medical and scientific documentation which PPL and the company's expert witnesses rely and will rely upon as evidence in support of such a claim.

I-154. Do PPL and/or the company's expert witnesses assert or make the claim that there is a reliable medical and scientific basis upon which to conclude that exposure to radiofrequency (RF)

fields at levels produced by PPL's AMI smart meter devices is without risk of adverse health effects?

I-155. If PPL's answer to 1-154 is in the affirmative, please identify specifically all empirical evidence in the form of actual medical and scientific research studies upon which PPL and the company's expert witnesses rely and will rely in support of such a claim.

I-156. If PPL's answer to 1-154 is in the affirmative, please produce and provide Complainants with copies of all empirical medical and scientific documentation which PPL and the company's expert witnesses rely and will rely upon as evidence in support of such a claim.

116. The Company objects to Complainants-III-151 through 156 on the grounds that the requests are repetitive of prior requests, vague, incomprehensible, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence.

117. These interrogatories are repetitive of prior requests to which PPL Electric has provided responses. For example, PPL Electric objected and responded, without waiving its objection, to prior discovery requests seeking the bases for the opinions of its expert witnesses. *See, e.g.,* PPL Electric Responses to Holder-II-1 through Holder-II-4. Therein, PPL Electric stated it would provide this information in the written direct testimony of its expert witnesses, in accordance with the litigation schedule established in this case. PPL Electric served written direct testimony on February 28, 2020, and its direct testimony sets forth its position and the scientific and medical opinions of its expert witnesses. Complainants-III-151 through 156 simply ask for information that is already in the Complainants' possession.

118. Moreover, as noted above, these requests are duplicative of prior requests contained in Complainants' Set III. Essentially, these requests once again ask for PPL Electric to confirm the medical and scientific opinions of its witnesses, and ask PPL Electric to identify and provide documents used to support its position, which are all set forth in the Company's direct

testimony. It is unreasonably burdensome and repetitive for PPL Electric provide the same information (which it has already provided) in response to discovery requests seeking the same information but asked different ways.

119. The interrogatories also use a number of vague and undefined terms and phrases, such as “exposure,” “without risk,” “biological effects,” and “adverse health effects.” Without clarification as to the meaning of these terms, PPL Electric cannot reasonably provide a complete and accurate response.

120. Further, Question Nos. 152, 153, 155 and 156 are unduly burdensome because they request PPL Electric to “identify specifically all empirical evidence in the form of actual medical and scientific research studies upon which PPL and the company's expert witnesses rely and will rely” and to “provide Complainants with copies of all empirical medical and scientific documentation which PPL and the company's expert witnesses rely and will rely upon as evidence.” PPL Electric’s expert witnesses have reviewed hundreds of studies in formulating their expert opinions, and have specifically identified relevant studies in their written direct testimony. It is unduly burdensome for PPL Electric to identify these studies a second time and to produce copies of these studies for the Complainants, where the Complainants can already access copies of the identified studies themselves.

121. Finally, these requests are not reasonably calculated to lead to the discovery of any additional, admissible evidence. PPL Electric has already submitted its written direct testimony, which provides the information sought in these discovery requests. The information sought by these requests is already in the Complainants’ possession and, therefore, these requests are not reasonably calculated to lead to the discovery of admissible evidence.

122. For these reasons, these interrogatories are repetitive, vague, incomprehensible,

unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence.

N. OBJECTIONS TO COMPLAINANTS-III-154 THROUGH 162⁸

123. Complainants Set III, Question Nos. 139 through 144 request:

I-154. Do PPL and/or the company's expert witnesses assert or make the claim that there is a reliable medical and scientific basis upon which to conclude that biological effects cannot and could not result from exposure to extremely low levels of radiofrequency (RF) radiation?

I-155. If PPL's answer to 1-154 is in the affirmative, please identify specifically all empirical evidence in the form of actual medical and scientific research studies upon which PPL and the company's expert witnesses rely and will rely in support of such a claim.

I-156. If PPL's answer to 1-154 is in the affirmative, please produce and provide Complainants with copies of all empirical medical and scientific documentation which PPL and the company's expert witnesses rely and will rely upon as evidence in support of such a claim.

I-157. Do PPL and/or the company's expert witnesses assert or make the claim that there is a reliable medical and scientific basis upon which to conclude that biological effects cannot and could not result from exposure to extremely low levels of radiofrequency (RF) radiation?

I-158. If PPL's answer to 1-157 is in the affirmative, please identify specifically all empirical evidence in the form of actual medical and scientific research studies upon which PPL and the company's expert witnesses rely and will rely in support of such a claim.

I-159. If PPL's answer to 1-157 is in the affirmative, please produce and provide Complainants with copies of all empirical medical and scientific documentation which PPL and the company's expert witnesses rely and will rely upon as evidence in support of such a claim.

⁸ On page 18 of 21 of the Complainants' Set III Discovery, the numbering for Question Nos. for 154, 155 and 156 are repeated. However, the questions labeled as numbers 154, 155 and 156 on page 18 of 21 are different questions. For purposes of this section, it should be understood that PPL Electric is objecting to numbers 154, 155 and 156 set forth on page 18 of 21 of the Complainants' Set III Discovery.

I-160. Do PPL and/or the company's expert witnesses assert or make the claim that there is a reliable medical and scientific basis upon which to conclude that adverse health effects cannot and could not result from exposure to extremely low levels of radiofrequency (RF) radiation?

I-161. If PPL's answer to 1-160 is in the affirmative, please identify specifically all empirical evidence in the form of actual medical and scientific research studies upon which PPL and the company's expert witnesses rely and will rely in support of such a claim.

I-162. If PPL's answer to 1-160 is in the affirmative, please produce and provide Complainants with copies of all empirical medical and scientific documentation which PPL and the company's expert witnesses rely and will rely upon as evidence in support of such a claim.

124. The Company objects to Complainants-III-154 through 162⁹ on the grounds that the requests are repetitive of prior requests, vague, incomprehensible, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence.

125. These interrogatories are repetitive of prior requests to which PPL Electric has provided responses. For example, PPL Electric objected and responded, without waiving its objection, to prior discovery requests seeking the bases for the opinions of its expert witnesses. *See, e.g.,* PPL Electric Responses to Holder-II-1 through Holder-II-4. Therein, PPL Electric stated it would provide this information in the written direct testimony of its expert witnesses, in accordance with the litigation schedule established in this case. PPL Electric served written direct testimony on February 28, 2020, and its direct testimony sets forth its position and the scientific and medical opinions of its expert witnesses. Complainants-III-154 through 162 simply ask for information that is already in the Complainants' possession.

126. Moreover, as noted above, these requests are duplicative of prior requests contained in Complainants' Set III. Essentially, these requests once again ask for PPL Electric to

⁹ *See* footnote 8 *supra*.

confirm the medical and scientific opinions of its witnesses, and ask PPL Electric to identify and provide documents used to support its position, which are all set forth in the Company's direct testimony. It is unreasonably burdensome and repetitive for PPL Electric provide the same information (which it has already provided) in response to discovery requests seeking the same information but asked different ways.

127. The interrogatories also use a number of vague and undefined terms and phrases, such as "exposure," "extremely low levels," "biological effects," and "adverse health effects." Without clarification as to the meaning of these terms, PPL Electric cannot reasonably provide a complete and accurate response.

128. Further, Question Nos. 155, 156, 158, 159, 161 and 162 are unduly burdensome because they request PPL Electric to "identify specifically all empirical evidence in the form of actual medical and scientific research studies upon which PPL and the company's expert witnesses rely and will rely" and to "provide Complainants with copies of all empirical medical and scientific documentation which PPL and the company's expert witnesses rely and will rely upon as evidence." PPL Electric's expert witnesses have reviewed hundreds of studies in formulating their expert opinions, and have specifically identified relevant studies in their written direct testimony. It is unduly burdensome for PPL Electric to identify these studies a second time and to produce copies of these studies for the Complainants, where the Complainants can already access copies of the identified studies themselves.

129. Finally, these requests are not reasonably calculated to lead to the discovery of any additional, admissible evidence. PPL Electric has already submitted its written direct testimony, which provides the information sought in these discovery requests. The information sought by these requests is already in the Complainants' possession and, therefore, these requests

are not reasonably calculated to lead to the discovery of admissible evidence.

130. For these reasons, these interrogatories are repetitive, vague, incomprehensible, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence.

O. OBJECTIONS TO COMPLAINANTS-III-163

131. Complainants Set III, Question 163 requests:

I-163. Please state whether the signal transmission strength of PPL's AMI wireless smart meters will vary depending on the meters' relative locations or distances from other meters or data reception facilities in PPL's AMI network.

132. The Company objects to Complainants-III-163 on the grounds that the request is vague, and not reasonably calculated to lead to the discovery of admissible evidence.

133. The interrogatory also uses vague and undefined terms and phrases, such as “relative locations or distances,” and “data reception facilities.” Without clarification as to the meaning of these terms, PPL Electric cannot reasonably provide a complete and accurate response.

134. In addition, this request is not reasonably calculated to lead to the discovery of admissible evidence. The issue in this proceeding is whether the installation of a PPL Electric AMI meter at the Complainants’ residences constitutes a violation of Section 1501 of the Public Utility Code. As such, information related PPL Electric meters or facilities that are not the meters located at the Complainants’ residences is not relevant or admissible, and is outside the scope of this proceeding. Moreover, the Complainants do not have standing to challenge the installation, operation or maintenance of PPL Electric facilities located off their property.

135. For these reasons, this interrogatory is vague, and not reasonably calculated to lead to the discovery of admissible evidence.

P. OBJECTIONS TO COMPLAINANTS-III-164

136. Complainants Set III, Question 164 requests:

I-164. Please provide Complainants with a copies of any and all documentation in PPL's possession which details the terms of the company's rights of easement specifically with regard to Complainants' properties at 2424 Lafayette Avenue and 1823 Butztown Road, both in Bethlehem, PA.

137. The Company objects to Complainants-III-164 on the grounds that the request is not reasonably calculated to lead to the discovery of admissible evidence.

138. This request is not reasonably calculated to lead to the discovery of admissible evidence. The issue in this proceeding is whether the installation of a PPL Electric AMI meter at the Complainants' residences constitutes a violation of Section 1501 of the Public Utility Code. PPL Electric's existing easements and/or property rights at either of the Complainants' properties are not at issue. Moreover, this information is not relevant to any claim that is within the Commission's jurisdiction to consider; the Commission has repeatedly held that it lacks jurisdiction to interpret easements or otherwise resolve disputes regarding property rights.

139. For these reasons, this interrogatory is not reasonably calculated to lead to the discovery of admissible evidence.

Q. OBJECTIONS TO COMPLAINANTS-III-165 THROUGH 168

140. Complainants Set III, Question Nos. 165 through 168 request:

I-165. Please cite any law, statute, official rule, or right of easement which would permit PPL to install radiofrequency transmission antennas on Complainants' homes without their consent.

I-166. Please cite any law, statute, official rule, or right of easement which would permit PPL to install computer devices on Complainants' homes without their consent.

I-167. Please cite any law, statute, official rule, or right of easement which would permit PPL to install any device other than

a meter, only a meter, and nothing but a meter on Complainants' homes without their consent.

I-168. Please cite any law, statute, official rule, or right of easement which would permit PPL to use Complainants' homes for the company's AMI meters to function as "relay points to transmit data."

141. The Company objects to Complainants-III-165 through 168 on the grounds that these requests improperly seek legal opinions.

142. These interrogatories improperly seek legal opinions, including on the Company's compliance with the Commission's regulations and the Commission's authority and discretion to impose sanctions and penalties. The Company's witnesses are not lawyers who can provide legal opinions. Further, discovery is intended for the discovery of facts and evidence that may be presented at the evidentiary hearing, not the legal opinions of the Company's attorneys that are protected by attorney-client privilege and the attorney work product doctrine. Rather, PPL Electric's legal arguments will be set forth in its closing argument and its briefs, if any, that are submitted in this proceeding.

143. For these reasons, these interrogatories improperly seek legal opinions.

R. OBJECTIONS TO COMPLAINANTS-III-169

144. Complainants Set III, Question 169 requests:

I-169. In Complainants' Interrogatories to PPL, Set II, Interrogatory No. 11-59, Complainants asked PPL to "state whether or not the Landis+Gyr AMI smart meters deployed by PPL are 'UL 2735 **Listed**'." PPL responded by stating: "The Landis + Gyr AMI meters being deployed by PPL Electric for residential customers are UL Certified." Please provide only a "yes" or "no" answer to the following question: "Are the Landis+Gyr AMI meters being deployed by PPL Electric for residential customers UL 2735 **Listed**?"

145. The Company objects to Complainants-III-169 on the grounds that the request is repetitive of prior requests, vague, and not reasonably calculated to lead to the discovery of

admissible evidence.

146. On its face, this interrogatory is repetitive of prior requests to which PPL Electric has provided responses. *See, e.g.*, PPL Electric Response to Holder-II-59. Therein, PPL Electric provided a full and complete response to this question. Complainants-III-169 simply seeks information already in the Complainants' possession. Therefore, this request is repetitive and not reasonably calculated to lead to the discovery of any additional, admissible evidence.

147. The interrogatory also use the vague and undefined term "UL 2735 Listed." Without clarification as to the meaning of this term as used by the Complainants in this request, PPL Electric cannot reasonably provide a complete and accurate response.

148. For these reasons, this interrogatory is repetitive, vague, and not reasonably calculated to lead to the discovery of admissible evidence.

S. OBJECTIONS TO COMPLAINANTS-III-170 THROUGH 175

149. Complainants Set III, Question Nos. 170 through 175 request:

I-170. Please identify with detailed specificity each and every customer data point that is measured by PPL's AMI wireless smart meter devices.

I-171. Please identify with detailed specificity each and every customer data point that is calculated by PPL's AMI wireless smart meter devices.

I-172. Please identify with detailed specificity each and every customer data point that is collected by PPL's AMI wireless smart meter devices.

I-173. Please identify with detailed specificity each and every customer data point that is stored by PPL's AMI wireless smart meter devices.

I-174. Please identify with detailed specificity each and every customer data point that is transmitted by PPL's AMI wireless smart meter devices.

I-175. Please identify with detailed specificity each and every

customer data point that is aggregated by PPL's AMI wireless smart meter devices.

150. The Company objects to Complainants-III-170 through 175 on the grounds that the requests are vague, unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence.

151. The interrogatories use a number of vague and undefined terms and phrases, such as “customer data point,” “measured,” “calculated,” “collected,” “stored,” “transmitted,” and “aggregated.” Without clarification as to the meaning of these terms, PPL Electric cannot reasonably provide a complete and accurate response.

152. Further, these questions are unduly burdensome because they request PPL Electric to identify information that is already available to the Complainants through public means. These requests seek information regarding “customer data points” “measured,” “calculated,” “collected,” “stored,” “transmitted,” and/or “aggregated” by PPL Electric’s AMI smart meters. The Company’s Smart Meter Technology Procurement and Installation Plan is publicly available. *See Petition of PPL Electric Utilities Corp. for Approval of Its Smart Meter Technology Procurement and Installation Plan*, Docket No. M-2014-2430781; *see also PPL Electric Exhibit MA-1*. It is unduly burdensome for PPL Electric produce this information a second time and to produce copies of these studies for the Complainants, where the Complainants already have been provided access to the information.

153. Finally, these requests are not reasonably calculated to lead to the discovery of any additional, admissible evidence. PPL Electric has already submitted its written direct testimony, which provides the information sought in these discovery requests. The information sought by these requests is already in the Complainants’ possession and, therefore, these requests are not reasonably calculated to lead to the discovery of admissible evidence.

154. For these reasons, these interrogatories are repetitive, vague, incomprehensible, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence.

T. OBJECTIONS TO COMPLAINANTS-III-176

155. Complainants Set III, Question 176 requests:

I-176. In reference to PPL's Customer Privacy Policy (PPL Electric Exhibit KD-4), please clarify and explain the following in detail:

- (1) In the bullet item "Providing necessary information to authorized EGSs and/or third party representatives," what is "necessary information"?
- (2) the bullet item "Aggregating data by retail electricity provider to settle the wholesale market"
- (3) In the statement: "PPL Electric does not share AMI Data, except as required or permitted by law, regulatory agencies, or governmental authorities," specifically what exceptions are required or permitted by law, regulatory agencies or governmental authorities?
- (4) According to PPL's privacy policy, does not the burden of responsibility fall upon the customer to do the necessary event log monitoring of the web portal in order to discover whether a user has gained unauthorized access to the customer's data?
- (5) Concerning the statement, "PPL Electric may share AMI Data in an aggregated and anonymized form": Specifically what data is aggregated, and how is it anonymized? How can PPL ensure that third parties with whom the company shares such data are not able to disaggregate and de-anonymize the data? How would third parties use the data if they were to not be able to identify the customers associated with the data?

156. The Company objects to Complainants-III-176 on the grounds that the request improperly seeks legal opinions, is vague, and seeks information not within PPL Electric's possession.

157. Subpart (3) of this interrogatory improperly seeks legal opinions, including on the Company's compliance with the Commission's regulations and laws applicable to the collection and protection of customer information. The Company's witnesses are not lawyers who can provide legal opinions. Further, discovery is intended for the discovery of facts and evidence that may be presented at the evidentiary hearing, not the legal opinions of the Company's attorneys that are protected by attorney-client privilege and the attorney work product doctrine. Rather, PPL Electric's legal arguments will be set forth in its closing argument and its briefs, if any, that are submitted in this proceeding.

158. Subpart (4) of this interrogatory also uses a number of vague and undefined terms and phrases, such as "burden of responsibility," "necessary event log monitoring," "unauthorized access," and "customer data." Without clarification as to the meaning of these terms, PPL Electric cannot reasonably provide a complete and accurate response.

159. In addition, subpart (5) of the request seeks information that is not within PPL Electric's possession. Specifically, this part of the question seeks regarding methods that third parties may use to disaggregate and de-anonymize collected data and how such third parties would be able to use the data if they were to not be able to identify the customers associated with the data. This part of the question specifically asks about the capabilities and actions of third parties, and not PPL Electric. Therefore, it seeks information not within PPL Electric's possession or control.

160. For these reasons, this interrogatory is improperly seeks legal opinions, is vague, and seeks information not within PPL Electric's possession.

U. OBJECTIONS TO COMPLAINANTS-III-177 THROUGH 179

161. Complainants Set III, Question Nos. 177 through 179 request:

I-177. Please state whether PPL's AMI smart meters consume

electric power for their operation.

I-178. If the answer to 1-177 is in the affirmative, please state whether PPL's customers are bearing the cost of the electric power consumed in the operation the company's AMI smart meters.

I-179. If the answer to 1-178 is in the affirmative, please state whether these charges have been fully and properly disclosed to PPL's customers.

162. The Company objects to Complainants-III-177 through 179 as being not reasonably calculated to lead to the discovery of admissible evidence.

163. The issue in this proceeding is whether the installation of a PPL Electric AMI meter at the Complainants' residences constitutes a violation of Section 1501 of the Public Utility Code. Whether the meters at issue consume power and how the costs associated with any consumed power are recovered are not at issue; this is not a proceeding challenging PPL Electric's rates.

164. For these reasons, these interrogatories are not reasonably calculated to lead to the discovery of admissible evidence.

V. OBJECTIONS TO COMPLAINANTS-III-180 THROUGH 185

165. Complainants Set III, Question Nos. 180 through 185 request:

I-180. Please state the total number of cases before the PA PUC in which PPL's legal counsel, Curtis Renner, of Watson & Reimer, has been involved as a pro hac vice attorney.

I-181. Please identify all specific cases litigated within the Commonwealth of Pennsylvania in which Mr. Renner has been involved as a pro hac vice attorney and the dates and time periods of his involvement.

I-182. Please identify all cases by docket number and date that are, or have been, before the PA PUC in which Mr. Renner has been involved as a pro hac vice attorney.

I-183. Please identify all cases by docket number and date for which PPL has retained the services of Mr. Renner.

I-184. Please verify with documentation that, in the instant case, all procedural requirements for the admission of Mr. Renner *pro hac vice* have been met in accordance with Rule § 81.503, § 81.504, and § 81.505, including the filing of a written motion by a member of the Pennsylvania bar, the provision by Mr. Renner of all information required of him to the IOLTA Board, and payment of the requisite fee to the IOLTA Board.

I-185. Please indicate and verify the exact date on which Mr. Renner fully met all requirements of admission *pro hac vice* specified in 1-184, *supra*, such that he thereby was able to be a party in the instant case.

166. The Company objects to Complainants-III-180 through 185 on the grounds that these requests cause unreasonable annoyance, and are not reasonably calculated to lead to the discovery of admissible evidence.

167. Question Nos. 180 through 185 cause unreasonably annoyance because they seek irrelevant information about the admission of PPL Electric's attorney, Mr. Renner, to appear and practice before the Commission. As an initial matter, Mr. Renner was admitted to the Pennsylvania bar on December 6, 2018. More to the point, information regarding Mr. Renner's authorization to practice before the Commission is entirely irrelevant to this proceeding. As Mr. Renner was admitted to practice in Pennsylvania prior to the filing of the above-captioned Formal Complaints, no *pro hac vice* motion was filed. The Complainants' attempts to interrogate the Company and Mr. Renner about his participation in other proceedings as counsel *pro hac vice* serve no purpose other than to annoy and harass the Company and Mr. Renner.

168. In addition, the issue in this proceeding is whether the installation of a PPL Electric AMI meter at the Complainants' residences constitutes a violation of Section 1501 of the Public Utility Code. Mr. Renner is not and has not ever been PPL Electric's witness; he is one of PPL Electric's attorneys. As such, the information sought will not lead to the discovery of any admissible evidence.

169. For these reasons, these interrogatories cause unreasonable annoyance, and are not reasonably calculated to lead to the discovery of admissible evidence.

III. CONCLUSION

WHEREFORE, PPL Electric Utilities Corporation objects to the Complainants' Set III Discovery requests on the grounds that they are vague, speculative, incomprehensible, overly broad, unduly burdensome, not reasonably calculated to lead to the discovery of admissible. Moreover, PPL Electric objects to this discovery as being sought in bad faith and being intended to cause unreasonable annoyance and harassment of PPL Electric and its witnesses.

Respectfully submitted,



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