

March 3, 2020

Via Certified Mail

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building, Second Floor W.
400 North Street
Harrisburg, PA 17120

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MAR 03 2020

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

RE: Pamela Scott v. Duquesne Light Company
Docket No. C-2018-3004042

Dear Secretary Chiavetta:

In accordance with Administrative Law Judge Jeffrey A. Watson's *Interim Order Granting In Part and Denying In Part Respondent's Motion In Limine To Preclude Joshua Hart From Testifying as an Expert Witness* dated February 25, 2020, enclosed please find *Complainant's Response to the Interim Order Granting In Part and Denying In Part Respondent's Motion In Limine To Preclude Joshua Hart From Testifying as an Expert Witness*. This response provides an up to date curriculum vitae of Joshua Hart and an expression of objection and concern that the ALJ incorrectly represented that no responsive pleading was filed by the Complainant in response to the Motion In Limine.

In addition, in accordance with Judge Jeffrey A. Watson's *Telephone Hearing Notice* dated January 30, 2020, I am enclosing one copy of the exhibits to which I will refer to in the telephonic hearing that is scheduled for Thursday, March 12, 2020. Also in accordance with the Notice, one copy of the exhibits will be provided to the Respondent and three copies will be provided to the Administrative Law Judge at least five business days before the hearing.

A copy of this letter and documents has been served upon ALJ Jeffrey A. Watson and the Respondent (Paul Shane Miller and Jeremy V. Farrell of Tucker Arensberg, attorneys for Duquesne Light Company) in accordance with Commission regulations.

Please feel free to contact me if you have any questions.

Sincerely,



Pamela Scott
134 Markham Drive
Pittsburgh, PA 15228-1008
(412) 998-8880

Encl: Complainant's Response to the Interim Order Granting In Part and Denying In Part Respondent's Motion In Limine

To Preclude Joshua Hart From Testifying as an Expert Witness

Curriculum vitae of Joshua Hart

Hearing Exhibits (7)

Cc: Paul Shane Miller & Jeremy V. Farrell (with enclosures)
Administrative Law Judge Jeffrey A. Watson (with enclosures)

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

PAMELA SCOTT

Complainant,

vs.

DUQUESNE LIGHT COMPANY

Respondent.

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Docket No. C-2018-3004042

**COMPLAINANT'S
RESPONSE TO THE
INTERIM ORDER
GRANTING IN PART
AND DENYING IN PART
RESPONDENT'S
MOTION
IN LIMINE
TO PRECLUDE
JOSHUA HART
FROM TESTIFYING
AS AN EXPERT WITNESS**

Filed by Complainant
Pamela Scott
134 Markham Drive
Pittsburgh, PA 15228-1008

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

PAMELA SCOTT	:	
	:	
Complainant,	:	
	:	
vs.	:	Docket No. C-2018-3004042
	:	
DUQUESNE LIGHT COMPANY	:	
	:	
Respondent.	:	

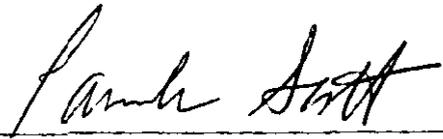
**COMPLAINANT'S RESPONSE
TO THE INTERIM ORDER GRANTING IN PART
AND DENYING IN PART RESPONDENT'S MOTION *IN LIMINE*
TO PRECLUDE JOSHUA HART FROM TESTIFYING AS AN EXPERT WITNESS**

I, Pamela Scott, hereby respond to Administrative Law Judge Jeffrey A. Watson's Interim Order Granting In Part and Denying In Part Respondent's Motion In Limine To Preclude Joshua Hart From Testifying as an Expert Witness dated February 25, 2020.

This response provides an up to date curriculum vitae of Joshua Hart.

In addition, this Complainant's response expresses concern that the Administrative Law Judge wrote that no responsive pleading was filed by the Complainant in response to the Duquesne Light Company's Motion In Limine To Preclude Joshua Hart From Testifying as an Expert Witness. In fact, Complainant's Answer to Respondent's Motion In Limine To Preclude Joshua Hart From Testifying as an Expert Witness was served on February 12, 2020. This was brought to Judge Watson's attention in correspondence sent via Certified Mail on February 29, 2020 which included an extra copy of the Complainant's response for his convenience.

Respectfully submitted,

A handwritten signature in cursive script, appearing to read "Pamela Scott", written in black ink. The signature is positioned above a horizontal line.

Pamela Scott, Complainant
134 Markham Drive
Pittsburgh, PA 15228-1008
(412) 998-8880

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PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

Joshua Hart
PO Box 682.
Portola, CA 96122
(888) 965 6435
josh@stopsmartmeters.org

EDUCATION

MSc Transport Planning (with Merit)
June 2008
University of the West of England, Bristol

Bachelor of Arts in Psychology
Minor in History, June 1998
University of California at Santa Cruz

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MAR 03 2020

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

EMPLOYMENT

Director, Stop Smart Meters!, Portola, CA
July 2010 to Present

- Established international network of groups and individuals organizing to spread awareness and stop deployment of wireless "smart" utility meters on homes and businesses
- Investigated and documented emerging issues related to threats to privacy, health, and fire safety from smart grid and other wireless technologies
- Established only toll-free hotline in the U.S. to support people coping with unwanted smart meter technologies in their homes, businesses, and communities

Network Development Manager, Living Streets, London UK
January 2009 to August 2009

- Provided technical assistance and organizational support to over 100 local campaign groups throughout the UK working to improve the public realm for people on foot.
- Developed in-depth materials for a locally based campaign for 20mph speed limits
- Presented *Driven to Excess*, MSc research on the effects of motor traffic on social capital at a number of conferences, events, and to local and national government bodies including Northern Ireland Assembly at Stormont and the Houses of Parliament in Westminster

Program Director, San Francisco Bicycle Coalition January 2003 to April 2005

- Organized members and allied community groups to testify at dozens of City Hall hearings and meetings in support of improvements to the City's bicycle route network, and adoption of bicycle friendly policies.
- Initiated and managed SFBC's BikeEd Program, based on the League of American Bicyclists' BikeEd curriculum, teaching cycling skills to thousands of adults citywide.
- Ran publicity campaigns to educate motorists and cyclists on safe roadway sharing

CA Project Coordinator, Rails-to-Trails Conservancy January 2000-June 2002

- Provided in-depth support to a variety of local advocacy organizations and public

- agencies around California working on rail-trail conversions
- Gave presentations to elected officials and community groups about the benefits, proper design, and management of public trails and on-road bicycle and pedestrian facilities
- Organized statewide legislative trail advocacy day in Sacramento to support the efforts of dozens of organizations engaged in trail policy development
- Researched and authored Tunnels on Trails, a study of 78 bike/ pedestrian tunnels in the United States (2001) as well as The Mission Creek Bikeway Concept Plan (2002)

Energy Sales Coordinator, Green Mountain Energy June 1999- December 1999

- Negotiated partnerships with retail outlets in San Francisco, Oakland, San Diego, and Santa Cruz as part of the California storefront tabling program
- Trained/ managed Field Consultants in sales strategy, environmental policy, and data concerning climate destabilization, energy use, and transport

League Cycling Instructor, League of American Bicyclists June 1998-June 2006

- Underwent intensive teacher's training program (both on and off road) and became accustomed with strategies for teaching the leading cycling curriculum in the US
- Organized, planned, and taught BikeEd classes to community groups and businesses with an emphasis on the environmental benefits of decreased auto dependence

ADDITIONAL SKILLS

- Graduate of SPIN Project media training course, San Francisco April 2004
- Extensive experience dealing with television, radio, and print media concerning a range of transport, environmental, and climate change messaging.
- Proficient in the French language

REFERENCES

Names of referees available on request

confidential and proprietary information.

(ii) For purposes of providing service under this paragraph to customers with a peak demand of 20 megawatts or greater at one meter at a location within that distribution company's service territory, an electric distribution company that has completed its restructuring transition period as of the effective date of this paragraph may, in its sole discretion, acquire an interest in a generation facility or construct a generation facility specifically to meet the energy requirements of the customers, including the electric requirements of the customers' other billing locations within its service territory. The electric distribution company must commence construction of the generation facility or contract to acquire the generation interest within three years after the effective date of this paragraph, except that the electric distribution company may add to the generation facilities it commenced construction or contracted to acquire after this three-year period to serve additional load of customers for whom it commenced construction or contracted to acquire generation within three years. Nothing in this paragraph requires or authorizes the commission to require an electric distribution company to commence construction or acquire an interest in a generation facility. The electric distribution company's interest in the generation facility it built or contracted to acquire shall be no larger than necessary to meet peak demand of customers served under this subparagraph. During times when the customer's demand is less than the electric distribution company's generation interest, the electric distribution company may sell excess power on the wholesale market. At no time shall the costs associated with the generating facility interests be included in rate base or otherwise reflected in rates. The generation facility interests shall not be commission-regulated assets.

(6) A default service plan approved by the commission prior to the effective date of this section shall remain in effect through its approved term. At its sole discretion, the default service provider may propose amendments to its approved plan that are consistent with this section, and the commission shall issue a decision whether to approve or disapprove the proposed amendments within nine months of the date that the amendments are filed. If the commission fails to issue a final order within nine months, the amendments shall be deemed to be approved and the default service provider may implement the amendments as filed.

(7) The default service provider shall offer residential and small business customers a generation supply service rate that shall change no more frequently than on a quarterly basis. All default service rates shall be reviewed by the commission to ensure that the costs of providing service to each customer class are not subsidized by any other class.

(f) Smart meter technology and time of use rates.--

(1) Within nine months after the effective date of this paragraph, electric distribution companies shall file a smart meter technology procurement and installation plan with the commission for approval. The plan shall describe the smart meter technologies the electric distribution company proposes to install in accordance with paragraph (2).

(2) Electric distribution companies shall furnish smart

meter technology as follows:

(1) Upon request from a customer that agrees to pay the cost of the smart meter at the time of the request.

(ii) In new building construction.

(iii) In accordance with a depreciation schedule not to exceed 15 years.

(3) Electric distribution companies shall, with customer consent, make available direct meter access and electronic access to customer meter data to third parties, including electric generation suppliers and providers of conservation and load management services.

(4) In no event shall lost or decreased revenues by an electric distribution company due to reduced electricity consumption or shifting energy demand be considered any of the following:

(i) A cost of smart meter technology recoverable under a reconcilable automatic adjustment clause under section 1307(b), except that decreased revenues and reduced energy consumption may be reflected in the revenue and sales data used to calculate rates in a distribution rate base rate proceeding filed under section 1308 (relating to voluntary changes in rates).

(ii) A recoverable cost.

(5) By January 1, 2010, or at the end of the applicable generation rate cap period, whichever is later, a default service provider shall submit to the commission one or more proposed time-of-use rates and real-time price plans. The commission shall approve or modify the time-of-use rates and real-time price plan within six months of submittal. The default service provider shall offer the time-of-use rates and real-time price plan to all customers that have been provided with smart meter technology under paragraph (2)(iii). Residential or commercial customers may elect to participate in time-of-use rates or real-time pricing. The default service provider shall submit an annual report to the price programs and the efficacy of the programs in affecting energy demand and consumption and the effect on wholesale market prices.

(6) The provisions of this subsection shall not apply to an electric distribution company with 100,000 or fewer customers.

(7) An electric distribution company may recover reasonable and prudent costs of providing smart meter technology under paragraph (2)(ii) and (iii), as determined by the commission. This paragraph includes annual depreciation and capital costs over the life of the smart meter technology and the cost of any system upgrades that the electric distribution company may require to enable the use of the smart meter technology which are incurred after the effective date of this paragraph, less operating and capital cost savings realized by the electric distribution company from the installation and use of the smart meter technology. Smart meter technology shall be deemed to be a new service offered for the first time under section 2804(4)(vi). An electric distribution company may recover smart meter technology costs:

(i) through base rates, including a deferral for future base rate recovery of current basis with carrying charge as determined by the commission; or

(ii) on a full and current basis through a reconcilable automatic adjustment clause under section 1307.

EXHIBIT A

for Complainant (Pamela Scott v. Duquesne Light Company, Docket No. C-2018-3004042) re: hearing scheduled for Thursday, March 17, 2020

(g) Definition.--As used in this section, the term "smart meter technology" means technology, including metering technology and network communications technology capable of bidirectional communication, that records electricity usage on at least an hourly basis, including related electric distribution system upgrades to enable the technology. The technology shall provide customers with direct access to and use of price and consumption information. The technology shall also:

(1) Directly provide customers with information on their hourly consumption.

(2) Enable time-of-use rates and real-time price programs.

(3) Effectively support the automatic control of the customer's electricity consumption by one or more of the following as selected by the customer:

(i) the customer;

(ii) the customer's utility; or

(iii) a third party engaged by the customer or the customer's utility.

Section 4. Section 2811 of Title 66 is amended by adding a subsection to read:

§ 2811. Market power remediation.

(e.1) Market misconduct.--

(1) If an electric distribution company or any of its affiliated companies or any company that an electric distribution company has purchased generation from is found guilty of market manipulation, exercising market power or collusion by the Federal Energy Regulatory Commission or any Federal or State court or, if an electric distribution company or any one of its affiliated companies or any company that an electric distribution company has purchased generation from settles a claim of market manipulation, exercising market power or collusion that is brought by a regional transmission operator's market monitoring unit, the Federal Energy Regulatory Commission or another entity, the commission:

(i) Shall direct the electric distribution company to take any and all reasonable action to quantify the effect of the market misconduct upon Pennsylvania ratepayers.

(ii) Following public hearing on the matter and a finding of public interest, may direct the electric distribution company to take any and all reasonable legal action, including the filing of a lawsuit as may be necessary, to recover the quantified damages which shall be used to recompense Pennsylvania ratepayers affected by the market misconduct.

(2) If the electric distribution company fails to pursue reasonable action to quantify or seek recovery of damages for Pennsylvania ratepayers affected by market manipulation, the exercise of market power or collusion, the commission is authorized, following notice and an opportunity of the electric distribution company to comply or contest, to assess a civil penalty, which shall not be recovered in rates, of not more than \$10,000 per day for failure or neglect to obey an order of the commission, the continuance of the failure or neglect being a separate offense.

(3) Any monetary damages recovered by the electric distribution company shall be paid to affected Pennsylvania ratepayers in the form of a credit to their electric bills or as refunds.

Energy Efficiency & Conservation Information for Consumers

Act 129 of 2009 provides Pennsylvania electricity consumers opportunities to take energy efficiency and conservation to the next level. The General Assembly enacted Act 129 to require Pennsylvania's seven largest electric distribution companies (EDCs) to develop energy efficiency and conservation (EE&C) plans and adopt other methods of reducing the amount of electricity consumed by customers. Pennsylvania's EDCs that are subject to Act 129 include Duquesne Light Company, Metropolitan Edison Company, PECO Energy Company, Pennsylvania Electric Company, Pennsylvania Power Company, PPL Electric LLC Gas Corporation, and West Penn Power Company.

The General Assembly charged the Pennsylvania Public Utility Commission (PUC) with implementing Act 129 and guiding consumers and electric utilities toward achieving the legislation's overall goals of reducing energy consumption and peak electric demand.

The Act is being implemented in phases that address the EDCs' multiple responsibilities to establish EE&C program plans. Phases I and II are now complete. Phase I began on 6/1/2009 and ended on 5/31/2013. Phase II began on 6/1/2013 and ended on 5/31/2016. For both Phase I and II all seven EDCs met their mandated energy consumption reduction and demand reduction targets. Phase III of Act 129, the current five-year phase, began on 6/1/2016 and will end on 5/31/2021.

Energy Efficiency & Conservation Programs

In March and May 2016, the PUC approved plans from the seven EDCs detailing how the companies intend to achieve consumption and peak demand reductions in Phase III.

In developing EE&C program guidelines, the Commission recognized a "one-size-fits-all" approach would not be the best approach. The Commission balances the needs of consumers with those of the EDCs as they work to meet the requirements of the legislation. The PUC's program standards provided each EDC with the ability to tailor its energy efficiency and conservation plan to its service territory and consumers. The PUC monitors the EDC plan implementation to ensure the programs are cost-effective and achieve the intended results.

In general, the EDC plans for residential consumers include:

- Residential energy star and high efficiency appliance programs that provide rebates to customers for the purchase of certain energy efficiency appliances.
- Residential incentive programs that provide rebates and point-of-sale discounts for the purchase and installation of higher efficiency lighting, such as light emitting diode (LED) lighting.
- Residential heating, ventilation and air conditioning (HVAC) efficiency programs that encourage consumers to purchase a high efficiency central air conditioner or heat pump.
- Residential appliance recycling programs that encourage customers to recycle older working refrigerators, freezers, air conditioners, and dehumidifiers.
- Residential home performance programs that provide for home energy audits and rebates toward implementing audit recommendations, and
- Low-income home energy audit and appliance recycling programs.



Consumers will receive specific information from their EDC on the money-saving EE&C programs available to them because of Act 129. These programs are designed to help consumers use electricity more efficiently, curb consumption and reduce overall demand for electricity. Many of these programs include rebates from the EDC to encourage the use and employment of energy efficiency measures. Customers are encouraged to contact their electric utility for more information.

Why Energy Efficiency & Conservation

The EE&C programs established in Act 129 offer many meaningful resources that help customers save money, reduce the impact on the environment, and increase the consumer's home comfort and quality of life.

The EE&C plans are designed to help the EDCs meet established electricity consumption and peak demand reduction targets. EDCs can be penalized up to \$20 million for failing to meet these reduction targets.

Act 129 Mandated Consumption Reduction Targets				
EDC	Phase II Savings Target (MWh)	Phase II Savings Achieved (MWh)	Phase II Total Savings Achieved (MWh)*	Phase III Savings Target (MWh)
Duquesne	276,722	377,248	510,965	440,915
Met-Ed	337,753	368,235	415,422	569,352
PECO	1,125,651	1,090,505	1,333,296	1,962,659
Pennlec	318,813	368,538	395,313	566,168
Penn Power	95,502	109,368	131,948	157,371
PPL	821,072	693,736	1,194,372	1,443,035
West Penn	337,533	358,073	418,002	540,986
Total	3,313,246	3,370,673	4,399,320	5,710,487

* including carryover savings from Phase I (MWh)

All of the efforts under Act 129 help to reduce the cost of electricity and enhance safety and reliability of electric service.

The EE&C requirements of Act 129 also help to offset the need to build new electric generation facilities. The energy savings from Phase I and II are equivalent to the electric generation from a very large coal-fired or nuclear power plant.

More information is available on the PUC website located at Act 129 -

For Further Information, Contact the Public Utility Commission:

Write

PA Public Utility Commission
Bureau of Consumer Services
400 North Street
Harrisburg, PA 17120

Call

1-800-692-7360
For people with speech or hearing loss, dial 7-1-1 (Telecommunications Relay Service)

Visit our website

www.puc.pa.gov

PA PUC
Pennsylvania Public Utility Commission



Exhibit 2017

EXHIBIT B

for Complainant (Pamela Scott v. Duquesne Light Company, Docket No. C-2018-3004042) re: hearing scheduled for Thursday, March 12, 2020.



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Yes. Pennsylvania's Act 129 of 2008 requires the state's seven largest electric distribution companies (EDCs) to develop energy efficiency and conservation (EE&C) plans and adopt other methods of reducing electricity used by customers – including the use of smart meters by their customers. The EDCs impacted by Act 129 are Duquesne Light; Met-Ed; Penn Power; PECO Energy; Penelec; PPL Electric Utilities; and West Penn Power.

The Public Utility Commission (PUC) is charged with implementing Act 129 and helping consumers and electric utilities reduce energy consumption, especially at peak times during the day. Smart meters are being installed in new construction and at individual customers' request, with the goal of all customers utilizing smart meters by 2023.

A smart meter is an advanced meter that measures electric usage more often than conventional meters and sends that information more quickly to the customer and the EDC. Through two-way communication, smart meters also can monitor the electric distribution system to ensure it is functioning properly.

Smart meters have the following basic functions: measure the electricity used; with customer consent, remotely coordinate electricity consumption; and interface with EDCs to identify outages and provide real-time visibility into the operational status of an electrical distribution system.

- Smart meters can help your utility restore your service faster during power outages.
- Smart meters can help you better understand how much electricity you are using throughout the day.
- Smart meters can reduce meter-reading costs and help detect theft of electricity.

Customers on time-of-use rate plans can use the information from smart meters to shift their usage to different times of the day when electricity costs less to produce. By using electricity more efficiently, customers can realize savings on their electric bills. For example, rather than running the dishwasher right after dinner when electric prices are higher, customers can wait until later in the evening to run the dishwasher.

Yes. The charge will be included as a separate line item or in your electric utility's base rate. You can confirm that information by contacting your utility. This charge covers the costs of assessing and deploying smart meter technology in accordance with Act 129. Under the law, utilities may begin assessing the surcharge for the work being done prior to actual installation of the meter. This charge applies to all customers.

EXHIBIT C

for Complainant (Pamela Scott v. Duquesne Light Company, Docket No. C-2018-3004042) re: hearing scheduled for Thursday, March 12, 2020.

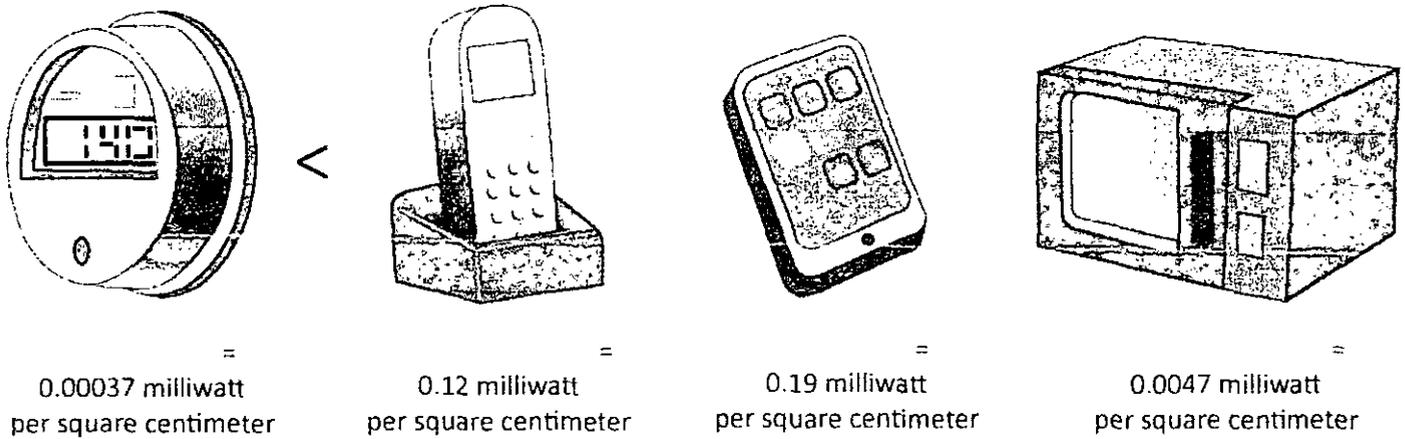
This surcharge is reviewed and approved by the PUC annually, and is subject to change. While there is no definitive timeframe to date, the surcharge is expected to remain on customers' bills as utilities work to achieve full smart meter deployment by 2023.

No. State law does not allow a customer to "opt out" of their EDC's smart meter program or surcharge. Installation of a smart meter is a condition of service to more accurately reflect rates and usage, and will ensure no disruption to your service. Questions concerning the process or timetable for the installation of your metering equipment should be directed to your electric utility.

Smart meters must be installed no later than 2023 for customers of the seven EDCs covered under the law. Customers who want the technology sooner may ask the EDC to install it. The customer must pay a fee for the early installation. That fee may be as little as \$17. Contact your electric utility for more information.

Smart meter communication network is a high-security environment that employs layers of protection from unwanted and unlawful access. Pennsylvania regulations restrict access to customer information, and do not permit an electric company or electric supplier to release private customer information to a third party without customer consent.

Smart meter communications can happen over the power lines or by radio frequency (RF), just like many other devices in your home. According to a study by the California Council of Science and Technology, wireless smart meters, when installed and properly maintained, result in much smaller levels of RF exposure than many existing common household electronic devices.



(Resource FCC's Standard average based on 30 minutes of exposure)

Write

PA Public Utility Commission
Bureau of Consumer Services
P.O. Box 3265
Harrisburg, PA 17105-3265

Call

1-800-692-7380
For people with speech or hearing loss,
dial 7-1-1 (Telecommunications Relay
Service)

Visit our websites

www.PAPowerSwitch.com
www.puc.pa.gov





UNDERSTANDING RADIO FREQUENCY AND YOUR NEW METER

Duquesne Light is replacing customers' current electric meters with new digital models. This exchange is part of an overall upgrade of the company's metering infrastructure required by Pennsylvania Act 123.

Once fully installed, our new advanced metering infrastructure will provide access to online tools that can help you manage your electric bill, set up email or phone alerts to warn you of potential high bills and, longer term, enhance our power restoration process following storms, including communication that can help you manage through times without power.

WHAT IS AN ADVANCED DIGITAL METER AND HOW DOES IT WORK?

Just like traditional analog meters, advanced digital meters measure how much electricity you use. The main difference is that advanced digital meters collect that information more times throughout the day. These new meters also allow two-way communication between the meter and Duquesne Light via a secure wireless network.

WHAT IS RADIO FREQUENCY?

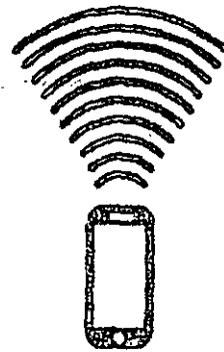
Radio frequency (RF) is a form of electromagnetic energy - both natural and man-made - that moves through space at the speed of light. RF waves are used for a variety of purposes, including telecommunication and satellite transmission of data. Every day, people use or are in close proximity to many devices that use RF, including cell phones, microwave ovens, wireless internet for your computer, baby monitors and garage door openers. Both the traditional analog meters and the advanced digital meters use low-energy RF waves to transmit your electricity-use information to Duquesne Light.

Continued on back

RADIO FREQUENCY LEVELS FOR ADVANCED DIGITAL METERS ARE SIGNIFICANTLY LOWER THAN MOST EVERYDAY WIRELESS HOUSEHOLD ITEMS, SUCH AS CELL PHONES.



DIGITAL METER
0.002 milliwatt/square cm



CELL PHONE
0.19 milliwatt/square cm

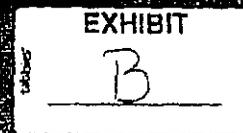


EXHIBIT D

for Complainant (Pamela Scott v. Duquesne Light Company, Docket No. C-2018-3004042) re: hearing scheduled for Thursday, March 12, 2020.

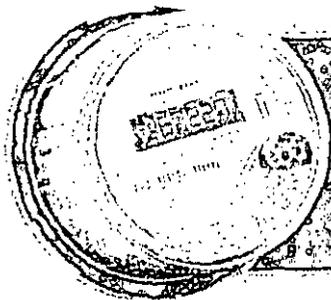


The World Health Organization has concluded that no adverse health effects have been demonstrated to result from exposure to low-level RF, such as that produced by advanced digital meters.

WHAT IS RADIO FREQUENCY? According to the Federal Communications Commission (FCC), the agency which sets limits for RF exposure, as with any other potential cause of RF, advanced digital meters have been thoroughly tested and certified to ensure they meet certain safety standards. The low-level RF exposure from advanced meters is well below the limit set by the FCC. In addition, according to a study by the California Council of Science and Technology, wireless advanced meters, when installed and properly maintained, result in much smaller levels of RF exposure than most of the common household electronic devices listed on the previous page.

OTHER THINGS TO KEEP IN MIND

- The RF output of the new digital meters is consistent with the output of Duquesne Light's current analog meters, which have been measuring and transmitting customers' usage *wirelessly* for almost 80 years.
- Advanced digital meters will transmit RF waves only for very short periods every day to send your energy-use information to Duquesne Light.
- RF waves weaken significantly as the distance between you and the device increases. The casing on an advanced meter, as well as the walls of your residence, also decrease the level of RF energy.



IN CONCLUSION

Duquesne Light's new advanced metering infrastructure network will safely put more information in the hands of our customers, allowing you to make more informed decisions about your energy consumption. This network will help create a more efficient, more reliable, and more sustainable electricity world for generations to come.

DLC DUGUESNE LIGHT CO.

MT. LEBANON

3,000 lose electricity

A downed wire in a wooded area of Mt. Lebanon yesterday afternoon knocked out power to 3,000 Duquesne Light customers, including the high school and the Galleria.

The utility had power restored for 2,000 customers within an hour of the outage, which occurred at 12:42 p.m. By 6 p.m., all but 125 customers were back in service.

EXHIBIT E

for Complainant (Pamela Scott v. Duquesne Light Company, Docket No. C-2018-3004042) re: hearing scheduled for Thursday, March 12, 2020.

K1 Person/Entity Involved Local Option

Business name (if applicable) 134 Markham Drive Area Code Phone Number

Check this box if same address as incident location. Then skip the three duplicate address lines.

Mr./Ms./Mrs. First Name Karen MI Last Name Saulsbery Suffix

Number Suffix Street or Highway Street Type Suffix

Post Office Box Apt./Suite/Floor City

State Zip Code

More people involved? Check this box and attach Supplemental Forms (NFIRS-1S) as necessary

K2 Owner Same as person involved? Then check this box and skip the rest of this section.

Local Option Business name (if applicable) Area Code 412 Phone Number 341-5439

Check this box if same address as incident location. Then skip the three duplicate address lines.

Mr./Ms./Mrs. First Name Robert MI H Last Name Sturges Suffix

Number 134 Suffix Street or Highway Markham Street Type DR Suffix

Post Office Box Apt./Suite/Floor City Pittsburgh

State PA Zip Code 15228

L Remarks
Local Option

Responded to a report of an odor of smoke in the structure.

Upon arrival we were met by several residents reporting similar conditions believed to be from a power surge which affected the area.

5C2 (Wilson) established command for overall activities. 5I5 (Gaetano) had interior for this structure.

Upon entering the structure we identified a strong electrical odor. The structure was checked and nothing obvious found with the exception of several double pole breakers had been tripped.

The bedroom in the C/D corner division 2 had the strongest odor. The ceiling fan was checked and the bulb appeared to have been blown but no odor. The access to the attic was also in this room. The attic was checked with negative results. It was then discovered that a multiplug adapter in the wall outlet had shorted out and there was also smoke stain on the wall. The plug was checked and found to be still powered. We then identified the circuit breaker controlling this outlet and tripped it. The plug was checked and the surrounding area with negative results. The power was left off to this outlet and related items.

All this was explained to the resident with the suggestion that the other 2 circuits with the double pole breakers be checked since they were tripped and we did not reset them.

Cleared.

L Authorization

Officer in charge ID 221 Signature Wilson, Grant C Position or rank Assignment Month 10 Day 25 Year 2001

Check this box if done as Greater Market assigned report ID in charge. 108 Signature Gaetano, Robert D Position or rank Assignment Month 10 Day 25 Year 2001

EXHIBIT F

for Complainant (Pamela Scott v. Duquesne Light Company, Docket No. C-2018-3004042) re: hearing scheduled for Thursday, March 12, 2020.

RECEIVED

MAR 03 2020

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU



Duquesne Light Company

Shut-off Notice

AVISO DE SUSPENSION DE SERVICIO

Date 10 AUG 2018

Name Pamela Scott

Hours – Monday through Friday

Address 134 Mackham Dr
Pittsburgh, PA 15228

9:00 a.m. to 5:00 p.m.

Account 5802920000

Payments by Phone 1-866-526-0815

(Payments must then be reported to DLC)

72 hr Shut-Off Notice

AVISO DE SUSPENSION DE SERVICIO

Your electric service (may be) has been) shut off for:

- Non-Access
- Unsafe Condition
- Irregular Wiring
- Unauthorized Use of Service

On or after 8:00 a.m. on 16 AUG 2018. We may act upon this notice for up to 60 days.

We will not shut off your electric service or will restore your service if you take the actions checked below:

- Allow us to enter your home/business to read, inspect, or change the electric meter.
- Pay a reconnection fee in the amount of \$ _____
- Pay for all un-metered or unauthorized service used.
- Obtain a wiring inspection from the appropriate wiring inspection agency.
- Call us at 1-888-393-7100 to properly apply for service.
- Other: Remove locks from meter base for exchange of meter
- Important: Once the above checked condition(s) are met, please contact Duquesne Light at 1-888-393-7100.**

If checked, the medical Emergency Notice on the back page applies in this case.

NO ACCESS

Rev 05-16-18

EXHIBIT G

for Complainant (Pamela Scott v. Duquesne Light Company, Docket No. C-2018-3004042) re: hearing scheduled for Thursday, March 12, 2020.

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

PAMELA SCOTT	:	
	:	
Complainant,	:	
	:	
vs.	:	Docket No. C-2018-3004042
	:	
DUQUESNE LIGHT COMPANY	:	
	:	
Respondent.	:	

CERTIFICATE OF SERVICE

I, Pamela Scott, hereby certify that I have this day served a true copy of Complainant's Response to the Interim Order Granting In Part and Denying In Part Respondent's Motion In Limine To Preclude Joshua Hart From Testifying as an Expert Witness, as well as the Complainant's exhibits for the hearing that is scheduled for March 12, 2020 upon the parties, listed below, in accordance with the requirements of 52 Pa. Code Section 1.54 (relating to service by a party).

VIA CERTIFIED MAIL:

Paul Shane Miller & Jeremy V. Farrell
Tucker Arensberg PC
1500 One PPG Place
Pittsburgh, PA 15222

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

Dated this 3rd day of March, 2020

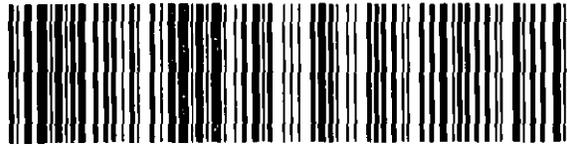


Pamela Scott
134 Markham Drive
Pittsburgh, PA 15228-1008
(412) 998-8880

RECEIVED
MAR - 3 2020
PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

Sender:
PAMELA SCOTT
134 MARKHAM DR
PITTSBURGH PA 15228-1008

USPS CERTIFIED MAIL®



9514 7066 5766 0064 1800 76

RETURN RECEIPT



U.S. POSTAGE
\$8.00
FCH LG ENV
15234 0000
Date of sale
03/04/2006
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06 25X
11488481 S

ROSEMARY CHIAVETTA, SECRETARY
PENNA. PUBLIC UTILITY COMMISSION
COMMONWEALTH KEYSTONE BLDG, 2ND FLR WEST
400 NORTH ST
HARRISBURG, PA 17120