

Tori L. Giesler, Esq.
(610) 921-6658
(330) 315-9263 (Fax)

August 3, 2020

VIA ELECTRONIC FILING

**Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor
Harrisburg, PA 17120**

**Re: Cindy Kelly v. Metropolitan Edison Company
Docket No. C-2018-3004681**

Dear Secretary Chiavetta:

Attached please find the Reply Brief on behalf of Metropolitan Edison Company (“Met-Ed” or the “Company”) regarding the above-referenced matter. This document has been served on the all parties as shown in the Certificate of Service.

Please contact me if you have any questions.

Very truly yours,



Tori L. Giesler

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Enclosures

c: As Per Certificate of Service

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

CINDY KELLY

v.

METROPOLITAN EDISON COMPANY

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DOCKET NO. C-2018-3004681

**REPLY BRIEF
ON BEHALF OF
METROPOLITAN EDISON COMPANY**

Tori L. Giesler, Attorney No. 207742
Lauren M. Lepkoski, Attorney No. 94800
2800 Pottsville Pike
P.O. Box 16001
Reading, Pennsylvania 19612-6001

Counsel for Metropolitan Edison Company

Dated: August 3, 2020

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I. INTRODUCTION

Metropolitan Edison Company (“Met-Ed” or the “Company”) hereby submits this Reply Brief in response to the Main Brief of Cindy Kelly, which was filed with the Pennsylvania Public Utility Commission (“Commission”) on January 30, 2020, pursuant to the December 20, 2019 Interim Order Extending the Briefing Schedule issued by the Administrative Law Judge Jeffrey A. Watson (“ALJ”) and the Interim Order Granting Complainant’s Request for Filing of Reply Briefs dated April 29, 2020. As more fully explained herein and in the Company’s Main Brief, the Formal Complaint should be dismissed with prejudice because the Complainant wholly failed to meet her burden of proof that the installation of a smart meter at her Service Location would constitute unreasonable service in violation of Section 1501 of the Public Utility Code or would otherwise violate the Public Utility Code, a Commission regulation or order.

II. LEGAL STANDARDS

As an initial matter, it appears that the Complainant incorrectly attempts to shift the burden of proof as a part of her Main Brief.¹ However, the law is clear. The Complainant maintains the burden of proof in this proceeding and must demonstrate that an “act or thing done or omitted to be done by any public utility [is] in violation, or claimed violation, of any law which the Commission has jurisdiction to administer, or of any regulation or order of the commission” in order his for her Formal Complaint to be sustained.² Any attempt to shift the burden of proof by the Complainant should be rejected.

¹ See, e.g., Complainant MB at 13 (asserting that Met-Ed has not shown it has adequately tested its smart meters for their effects on human health).

² Met-Ed MB at 3-4.

III. REPLY ARGUMENT

The Complainant has failed to demonstrate that the installation of a smart meter at her residence constitutes unsafe or unreasonable service in violation of Section 1501 of the Public Utility Code. Contrary to the Complainant's claims, Met-Ed has acted in compliance with the Public Utility Code, Act 129 of 2008,³ and Met-Ed's Commission-approved smart meter technology procurement and installation plan ("SMDP").⁴ Each argument to the contrary raised in the Complainant's Main Brief should be rejected and, for the reasons explained below and more fully explained in Met-Ed's Main Brief, the Complaint should be dismissed.

A. THE COMPLAINANT FAILED TO DEMONSTRATE THAT MET-ED'S CONTACTS WITH HER PRIOR TO THE COMPLAINT CONSTITUTES UNREASONABLE SERVICE.

The Complainant initially argues that Met-Ed is missing information related to contacts that it had with the Complainant regarding the installation of a smart meter at her residence.⁵ To the contrary, Met-Ed's records accurately reflect that, on multiple occasions, the Complainant refused the installation of a smart meter on her residence.⁶ Complainant's attempts to describe information that is allegedly missing from Met-Ed's records in her Main Brief appear to be nothing more than a continuation of her efforts at hearing to avoid this simple fact.⁷ Importantly, despite repeatedly being: (1) asked whether she was refusing or accepting a smart meter; and (2) directed by the ALJ to answer the question, the Complainant refused to answer this simple

³ 66 Pa.C.S. § 2806.1, *et seq.*

⁴ See Met-Ed Exh. JCA 1; *Joint Petition of Metropolitan Edison Company, Pennsylvania Electric Company, Pennsylvania Power Company and West Penn Power Company For Approval of Their Smart Meter Deployment Plan*, Docket Nos. M-2013-2341990, M-2013-2341991, M-2013-2341993, and M-2013-2341994 (Sec. Letter dated June 20, 2014). (hereinafter, "Smart Meter Deployment Plan" or "SMDP").

⁵ Complainant MB at 8 (referencing a Met-Ed record of customer contacts that was entered into the evidentiary record at Joint Exhibit 1).

⁶ See Joint Exhibit 1 at 1-3.

⁷ See Tr. 320-325.

question.⁸ The Complainant's testimony at hearing and arguments in Brief on this point demonstrates why a Met-Ed customer service representative may not have been able to accurately represent the nature of her contact: the Complainant could not accurately articulate it herself. As such, the Complainant has failed to demonstrate that Met-Ed's contacts with her in the months leading up to the filing of the Complaint constitute a violation of the Public Utility Code, the Commission's regulations or any applicable Commission order.

B. MET-ED IS REQUIRED BY LAW TO INSTALL A SMART METER ON THE COMPLAINANT'S RESIDENCE AND NO OPT-OUT IS AVAILABLE.

The Complainant next argues that Met-Ed is not required to install a smart meter at her service location under Pennsylvania law.⁹ In her Main Brief, the Complainant attempts to argue that: (1) the plain language of Act 129, the Commission regulations and the Company's SMDP demonstrate the installation of a smart meter is not mandatory¹⁰; (2) the legislative history of Act 129 controls and demonstrates customers may opt-out of smart meter installation¹¹; the language of pending legislation demonstrates that opt-outs are required¹²; and (4) the Company has violated Section 1501 of the Public Utility Code¹³ by not permitting the Complainant to opt-out of the installation of a smart meter.¹⁴ Each of this arguments is without merit and should be rejected.

As to her first argument, Met-Ed explained that the Commission cannot grant exceptions to the statutory directive set forth in Act 129.¹⁵ Moreover, the Complainant fails to actually

⁸ *Id.*

⁹ See Complainant MB at 8-12 (Arguments 2-10).

¹⁰ Complainant MB at 8-9 (Arguments 2-3, 5, 9-10).

¹¹ Complainant MB at 9-11 (Arguments 4, 7).

¹² Complainant MB at 11-12 (Argument 8).

¹³ 66 Pa.C.S. § 1501.

¹⁴ Complainant MB at 10-11 (Argument 6).

¹⁵ Met-Ed MB at 7-9.

engage in a plain language analysis of Act 129. Specifically, the Complainant fails to address the meaning of the word “shall” use in Act 129. The plain language of Act 129 states that EDCs, like Met-Ed, “shall” install the new AMI meters.¹⁶ Importantly, the word “shall” has been declared by Pennsylvania courts to mean “must.”¹⁷ Indeed, the plain language of Act 129 dictates that Met-Ed “must” install smart meters, and does not permit it to provide an opt-out. Consistent with this language, Commission precedent has uniformly rejected requests for opt-outs.

The Complainant’s attempts to attack Mr. Ahr’s testimony should also be rejected. Mr. Ahr repeatedly, credibly testified that the installation of smart meters is mandatory under Act 129, and the Company’s SMDP.¹⁸ Moreover, the Complainant’s admission that Act 129 does not contain an “opt-out” provision corroborates Mr. Ahr’s testimony.¹⁹

The Complainant’s reliance on Chapter 57, Subchapter O of the Commission’s regulations²⁰ should also be rejected.²¹ Importantly, Chapter 57, Subchapter O of the Commission’s regulations was adopted in 1998, *i.e.* 10 years prior to the passage of Act 129. As such, these regulations do not apply to the smart meter technology that electric distribution companies (“EDCs”) are required to install under Act 129. In addition, the meters required to be installed under these regulations have previously been found by the Commission to not satisfy

¹⁶ See 66 Pa.C.S. § 2807(f)(2) (emphasis added).

¹⁷ See *Whiteford v. Dep’t of Transp.*, 728 A.2d 1127, 1131 (Pa. Cmwlth. 2001) (“[T]he word ‘shall’ denotes a mandatory, not discretionary instruction.”) (citations omitted); *C.B. v. J.B.*, 65 A.3d 946, 952 (Pa. Super. 2013) (finding that “[t]he use of ‘shall’ means . . . must” and that to hold otherwise “would be to flout the legislative will”); *In re Canvass of Absentee Ballots of Nov. 4, 2003 Gen. Election*, 843 A.2d 1223, 1233 (Pa. 2004) (“[W]e are not compelled to pretend that ‘shall’ means ‘may’ under Section 3146.6(a).”); *Griesmer v. Hill*, 36 Pa. Super. 69 (Pa. Super. 1908) (“This provision is mandatory, and not directory merely. It means what it says. The word ‘shall’ means ‘shall’ [The defendant] not only may but ‘must.’”).

¹⁸ Tr. 334-338, 341, 346-349.

¹⁹ Met-Ed MB at 8 (citing Tr. 165, 193).

²⁰ 52 Pa. Code § 52.251 *et seq.*

²¹ Complainant MB at 10 (Argument 5).

the requirements of Act 129.²² Therefore, the regulations cited by the Complainant are irrelevant to the questions of whether Met-Ed's smart meters and SMDP are compliant with Act 129 and whether Act 129 permits customers to opt-out of the installation of a smart meter.

Regarding the Complainant's second argument, a few legislators' comments about Act 129 do not control the analysis of whether an opt-out is permitted. Under the Pennsylvania Statutory Construction Act, "[w]hen the words of a statute are clear and free from all ambiguity, the letter of it is not to be disregarded under the pretext of pursuing its spirit."²³ Here, the plain language of Act 129 states that EDCs, like Met-Ed, "shall" install the new AMI meters.²⁴ Therefore, a few legislators' comments about the interpretation of the statute need not and should not be considered.²⁵

Additionally, even if the statute were ambiguous, the "administrative interpretations of such statute" should be considered and given substantial weight.²⁶ Indeed, the Commission, which is the entity charged with implementing and enforcing Section 2807(f) of the Public Utility Code, has issued several orders holding that there is no opt-out under the statute.²⁷ Thus, there is no opt-out under Act 129, and the Complainant's attempted reliance on its legislative history should be rejected.

The Complainant's third argument, which references various proposed and/or pending bills before the Pennsylvania General Assembly that she asserts demonstrates Act 129 was

²² See *Petition of PPL Electric Utilities Corporation for Approval of Smart Meter Technology Procurement and Installation Plan*, Docket No. M-2009-2123945, p. 24 (Order entered June 24, 2010) (holding that PPL Electric Utilities' existing power line carrier meters deployed prior to the passage of Act 129 in compliance with Chapter 57, Subchapter O, did not comply with the mandates of Act 129 and ordering PPL Electric Utilities to develop a new smart meter plan that would deploy new AMI technology that fully met Act 129's requirements).

²³ 1 Pa.C.S. § 1921(b).

²⁴ See 66 Pa.C.S. § 2807(f)(2).

²⁵ See 1 Pa.C.S. § 1921(c).

²⁶ *Id.* § 1921(c)(8).

²⁷ See Met-Ed MB, Section IV.A.

intended to be an “opt in” statute,²⁸ should also be rejected. It is axiomatic that proposed and/or pending legislation does not constitute law. Although bills have been proposed in the General Assembly to add such an opt-out (see, e.g., House Bill 2188 dated February 8, 2012, House Bill 1564 of 2017-2018 Session), not one of them has been enacted. These bills do not constitute law and do not modify the mandatory requirements of Act 129 and applicable Commission orders. Therefore, customer cannot opt-out of the AMI meter installation under Act 129.

Finally, the Complainant failed to demonstrate that the Company has violated Section 1501 of the Public Utility Code by not permitting her to opt-out of the installation of a smart meter at her residence.²⁹ As explained above and in Met-Ed’s Main Brief, Met-Ed is required by law to install a smart meter at the Complainant’s residence and no opt-out is permitted under Act 129 or the Company’s SMDP. Moreover, as explained below, the Complainant failed to demonstrate Met-Ed’s smart meter is detrimental to her health and/or safety.

For these reasons, and the reasons more fully explained in Met-Ed’s Main Brief, the Complaint should be denied.

C. THE COMPLAINANT FAILED TO PROVE HER PRIVACY AND CYBERSECURITY CONCERNS REGARDING MET-ED’S SMART METERS WERE VALID.

Next, the Complainant cites to an inadmissible, extra-record report and appears to assert she has privacy and cybersecurity concerns regarding Met-Ed’s smart meters.³⁰ The Complainant’s concerns are unsubstantiated and should be rejected.

As an initial matter, Met-Ed notes that “Exhibit E 41 a report issued by James R. Clapper...on September 10, 2015” was objected to as hearsay and not admitted into the record at

²⁸ Complainant MB at 11-12 (Argument 8).

²⁹ Complainant MB at 10-11 (Argument 6).

³⁰ Complainant MB at 12-13 (Argument 11).

the hearing.³¹ Rather, the ALJ has only taken official notice of this document.³² No weight should be given to this document. It does not reference or address Met-Ed's smart meters, SMDP or privacy policy and, therefore, is irrelevant to this proceeding. Moreover, the Complainant was not certified as an expert in this proceeding and, therefore, cannot rely upon this document to support her lay opinions; she is only permitted to provide opinion testimony on issues about which she has personal knowledge.³³

Moreover, Met-Ed rebutted Complainant's concerns regarding cybersecurity and privacy related to its smart meters.³⁴ Met-Ed witness Mr. Ahr credibly testified to the protective measures Met-Ed implemented with respect to smart meters under its Commission-approved Privacy Policy.³⁵ In addition, Mr. Ahr explained the security protections applicable to Met-Ed's smart meter network³⁶ and also explain that its smart meter network complies with the advanced meter infrastructure guidelines published by the North American Energy Standards Board and the National Institute of Standards and Technology.³⁷

For these reasons and the reasons more fully explained in Met-Ed's Main Brief, the Complainant has failed to carry her burden with respect to her privacy and cybersecurity concerns and these claims should be denied.

D. THE COMPLAINANT'S CLAIMS UNDER THE AMERICANS WITH DISABILITIES ACT ARE NOT PROPERLY BEFORE THE COMMISSION AND ARE UNSUBSTANTIATED.

³¹ Tr. 278.

³² See Interim Order Granting Complainant's Request to Take official Notice of Complainant Exhibit E 41-47 and Complainant Exhibit A-37-39, dated May 11, 2020.

³³ Met-Ed MB at 13.

³⁴ Met-Ed MB at 10-11.

³⁵ Tr. 350-354.

³⁶ Tr. 353.

³⁷ Tr. 353-354.

The Complainant further cites “Exhibit A 37” and asserts that she is entitled to an accommodation under the Americans with Disabilities Act (“ADA”).³⁸ However, it is well-established that the Commission lacks subject matter jurisdiction to interpret and enforce the ADA.³⁹ As the Commission held in *Frompovich*:

[I]t is beyond the jurisdiction of Commission to determine whether the Complainant has a disability or a cause of action under the American with Disabilities Act. See I.D. at 18. If Ms. Frompovich believes that she has a valid ADA claim against PECO, she must work through the federal courts or one of the federal enforcement agencies, which include the Department of Labor, the Equal Employment Opportunity Commission, the Department of Transportation, the Federal Communications Commission or the Department of Justice, but not this Commission.

Frompovich, 2018 Pa. PUC LEXIS at *69.

Furthermore, the Complainant failed to present credible expert testimony to demonstrate that Met-Ed’s smart meters have caused or exacerbated, or will cause or exacerbate, any adverse health conditions. Met-Ed explained in its Main Brief that the Complainant submitted not admissible evidence justifying her non-expert belief that the installation of a smart meter may have a negative impact on her health.⁴⁰ Complainant’s speculation regarding any alleged health concerns is not sufficient to find Met-Ed’s smart meters present health risks.

E. THE COMPLAINANT HAS FAILED TO DEMONSTRATE THAT MET-ED’S SMART METERS ARE UNSAFE OR WILL CAUSE OR EXACERBATE ADVERSE HEALTH CONDITIONS.

The Complainant further asserts that the Company’s smart meters present health and safety concerns.⁴¹ With respect to the alleged safety concerns, the Complainant asserts that Met-

³⁸ Complainant MB at 13 (Argument 12).

³⁹ See *Frompovich v. PECO Energy Co.*, 2018 Pa. PUC LEXIS 160, at *69 (Order entered May 3, 2018).

⁴⁰ Met-Ed MB at 10.

⁴¹ Complainant MB at 13-14 (Arguments 13).

Ed's smart meters present a risk of fire.⁴² With respect to the alleged health concerns, the Complainant asserts that Met-Ed has "not done any health related research or studies to determine if the technology they are deploying is safe."⁴³ Each of this arguments should be rejected.

The Complainant misrepresents the testimony of Mr. Ahr. Mr. Ahr testified that he was not aware of a single instance where a Met-Ed smart meter caught fire.⁴⁴ This is a clear statement by Mr. Ahr, which the Complainant tries to mischaracterize by asserting that Mr. Ahr "did not know how many meters in the Met Ed territory had overheated, melted down or caught fire."⁴⁵

The Complainant's apparent attempt to misrepresent Mr. Ahr's testimony should be rejected. Mr. Ahr testified that Met-Ed's smart meters are compliant with all applicable safety requirements and have been independently tested and certified.⁴⁶ Contrary to the Complainant's presentation of her speculative, non-expert concerns, Mr. Ahr provided credible, unrebutted expert testimony that the smart meters being deployed by Met-Ed are safe.

Furthermore, the Complainant failed to carry her burden to demonstrate Met-Ed's smart meters may have harmful health impacts.⁴⁷ As Met-Ed explained in its Main Brief, the Complainant is not an expert and did not present any expert testimony justifying her personal belief that a smart meter may impact her health.⁴⁸ Moreover, Complainant's repeated attempts to introduce inadmissible hearsay evidence in support of her concerns were each properly objected

⁴² Complainant MB at 13 (citing the testimony of Mr. Ahr).

⁴³ Complainant MB at 13.

⁴⁴ Tr. 387-388.

⁴⁵ Complainant MB at 13.

⁴⁶ Met-Ed MB at 11-12.

⁴⁷ Met-Ed MB at 10.

⁴⁸ Met-Ed MB at 10.

to and such objections were sustained.⁴⁹ Therefore, her speculative, non-expert concerns should be rejected.

F. THE COMPLAINANT FAILED TO DEMONSTRATE THAT MET-ED DOES NOT PROPERLY INSTALL, TEST AND MAINTAIN ITS SMART METERS.

Ms. Kelly also asserts that Met-Ed does not adequately install, test and maintain its smart meters.⁵⁰ The Complainant cites a document that she asserts shows smart meters “result in much smaller levels of RF [radio frequency] exposure than many existing common household electronic devices,” and several excerpts of the hearing transcript to attempt to support this assertion.

Complainant’s attempts to take Mr. Ahr’s testimony out of context should be rejected. At the outset, Met-Ed notes that the Complainant admits in her Main Brief that smart meters have lower levels of radio frequency exposure than other household devices. Furthermore, Mr. Ahr explained that Met-Ed’s smart meters are compliant with all applicable requirements established by agencies such as the Federal Communications Commission, developed and tested to meet the requirements of the American National Standards Institute, and certified by the Underwriters Laboratory.⁵¹ Moreover, the Complainant has presented no evidence that Met-Ed’s smart meters are not properly installed or maintained. As such, the Complainant has failed to satisfy her burden of proof and her claims should be rejected.

G. THE COMPLAINANT WAS AFFORDED DUE PROCESS.

⁴⁹ Met-Ed MB at 12-14.

⁵⁰ Complainant MB at 14 (Argument 14).

⁵¹ Complainant MB at 10-11.

In her Main Brief, the Complainant also appears to assert that she was not afforded due process in this proceeding.⁵²

However, the Commission’s “administrative process” has not violated the Complainant’s due process rights. The Commission, as an administrative body, is bound by the due process provisions of constitutional law and by the principles of common fairness.”⁵³ “Among the requirements of due process are notice and an opportunity to be heard on the issues, to be apprised of the evidence submitted, to cross-examine witnesses, to inspect documents, and to offer evidence in explanation or rebuttal.”⁵⁴ Met-Ed submits that the Complainant has been afforded due process in this proceeding; she was provided the opportunity to conduct discovery, call upon and cross examine witness, and submit post-hearing briefs.

Moreover, Met-Ed notes that, throughout the proceeding, the Complainant has evidenced a lack of willingness to cooperate and comply with the Commission’s procedural regulations. Specifically, the Complainant declined to participate in a prehearing conference after the ALJ issued an Interim Order scheduling a prehearing conference,⁵⁵ failed to comply with the ALJ’s litigation schedule which required the Complainant to identify all fact and expert witnesses on or before a date certain,⁵⁶ repeatedly failed to follow the instructions and directives of the ALJ at hearing which lead to parts of her testimony being stricken,⁵⁷ and repeatedly refused to respond to questions on cross examination.⁵⁸ Any of the Complainant’s frustrations with the process and

⁵² See Complainant MB at 14-15 (Arguments 15-16).

⁵³ *Hess v. Pa. PUC*, 107 A.3d 246, 266 (Pa. Cmwlth. 2014) (citations omitted).

⁵⁴ *Id.* (citations omitted).

⁵⁵ Tr. 49-52; see also Complainant’s Reply Status Report dated May 17, 2019 (“I decline any prehearing conference recommended by Met-Ed...”).

⁵⁶ Tr. 55-56

⁵⁷ See e.g., Tr. 186.

⁵⁸ See Tr. 320-325.

administrating of this proceeding are solely the result of her own conduct. Therefore, any asserted due process claims should be denied.

H. THE COMPLAINANT’S CLAIMS UNDER THE UNITED STATES CONSTITUTION ARE NOT VALID.

The Complainant also claims that this case is about whether “Metropolitan Edison...[i]s in compliance with Article IV of the US Constitution that guarantees safety of persons in their homes.”⁵⁹ As an initial matter, Met-Ed notes that Article IV of the United States Constitution⁶⁰ is completely inapplicable to this proceeding. However, to the extent that the Complainant is asserting a claim under the Fourth Amendment to the United States Constitution,⁶¹ Met-Ed submits that the Complainant has failed to carry her burden with respect to such claim.

As an initial matter, the Company notes that for there to be a deprivation of constitutional rights, two elements must be met: (1) “the deprivation must be caused by the exercise of some right or privilege created by the state”; and (2) “the party charged with the deprivation must be a person who may fairly said to be a state actor.”⁶²

Here, Met-Ed is not a state actor. In *Jackson v. Metropolitan Edison Co.*, the U.S. Supreme Court found that a Pennsylvania electric utility, *i.e.*, Metropolitan Edison Company, was not a state actor, even though it arguably had “monopoly power” and “provided an essential public service required to be supplied on a reasonably continuous basis.”⁶³ Therefore, in keeping with the U.S. Supreme Court’s holding in *Jackson*, Met-Ed similarly is not a state actor.

⁵⁹ Complainant MB at 7.

⁶⁰ U.S. Const. art. IV (regarding states, citizenship and new states).

⁶¹ U.S. Const. amend. IV.

⁶² *Commonwealth v. Corley*, 491 A.2d 829, 832 (Pa. 1985) (emphasis added) (quoting *Lugar v. Edmonson Oil Co.*, 457 U.S. 922, 937 (1982)); see *Commonwealth v. Demor*, 942 A.2d 898, 899-900 (Pa. Super. 2008) (applying principles outlined in *Corley* to Fourth Amendment analysis); *W. Pa. Socialist Workers 1982 Campaign v. Conn. General Life Ins. Co.*, 485 A.2d 1, 5-6 (Pa. Super. 1984) (“[T]he search and seizure provisions of Article 1, section 8, have been held inapplicable to the conduct of private parties.”) (citations omitted).

⁶³ *Jackson v. Metropolitan Edison Co.*, 419 U.S. 345, 351-53 (1974).

Moreover, even if the Company were a state actor, the Seventh Circuit Court of Appeals found that the collection of smart meter data by a city-owned public utility was a reasonable warrantless search.⁶⁴ Thus, Met-Ed cannot violate, and has not violated, the Complainant's constitutional rights by installing the new smart meter.

IV. CONCLUSION

WHEREFORE, Metropolitan Edison Company respectfully requests that the Administrative Law Judge Jeffrey A. Watson recommend that the Pennsylvania Public Utility Commission dismiss the Formal Complaint of Cindy Kelly with prejudice.

Respectfully submitted,

Dated: August 3, 2020



Lauren M. Lepkoski
Attorney No. 94800
Tori L. Giesler
Attorney No. 207742
FirstEnergy Service Company
2800 Pottsville Pike
P.O. Box 16001
Reading, Pennsylvania 19612-6001
(610) 921-6203
(610) 921-6658
llepkoski@firstenergycorp.com
tgiesler@firstenergycorp.com

Counsel for Metropolitan Edison Company

⁶⁴ See *Naperville Smart Meter Awareness v. City of Naperville*, 900 F.3d 521, 527-29 (7th Cir. 2018).

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

CINDY KELLY :
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 v. : DOCKET NO. C-2018-3004681
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 METROPOLITAN EDISON COMPANY :

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the Reply Brief of Metropolitan Edison Company upon the individuals listed below, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

Service by electronic mail as follows:

Cindy Kelly
7252 Camp Meeting Road
New Tripoli, PA 18066
Kellycj7893@aim.com

Administrative Law Judge Jeffrey A. Watson
Pennsylvania Public Utility Commission
Piatt Place, Suite 220
301 5th Avenue
Pittsburgh, PA 15222
jeffwatson@pa.gov

Dated: August 3, 2020



Lauren M. Lepkoski
Tori L. Giesler
FirstEnergy Service Company
2800 Pottsville Pike
P.O. Box 16001
Reading, Pennsylvania 19612-6001
(610) 921-6203
(610) 921-6658
llepkoski@firstenergycorp.com
tgiesler@firstenergycorp.com