

Larry R. & Ellen M. Kramer
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August 14, 2020

VIA EMAIL

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

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

Dear ALJ Watson:

Attached are our Objections to the Exhibits of Met-Ed at the June 29, 2020 Hearing by email as instructed at the hearing.

This document has been served as shown in the Certificate of Service.

Please feel free to contact us with any questions.

Sincerely,


Larry R. Kramer


Ellen M. Kramer

cc as per Certificate of Service
Secretary Rosemary Chiavetta
Respondent

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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

OBJECTIONS TO THE EXHIBITS OF MET-ED
AT THE JUNE 29, 2020 HEARING

TO ADMINISTRATIVE LAW JUDGE JEFFREY A. WATSON:

As the Complainants in the above-mentioned case, we are filing these objections to the exhibits of Met-Ed in this case.

I. Met-Ed's PD -1: 66 Pa.C.S. § 2807

A. We withdrawal our objection to this exhibit as it contains the language from Act 129 which restricts deployment of smart meters unless requested and initially in new building construction. (page 24)

II. Met-Ed's PD -2: Smart Meter Procurement and Installation, Docket No. M -2009-2092655 (Order entered June 24, 2009).

- A. Those who were involved in the creation were not at the hearing and available for questioning. Therefore, this is hearsay.
- B. The document states, "the Commission will direct all covered EDCs to develop a plan to install smart meters in new construction that is begun after the network grace period." Act 129 did not expressly state that *all* new construction was to have smart meter technology. This appears to be illegitimate based on the reading of Act 129. (page 13)
- C. This document is illegitimate as it rewrites and goes against the legislative intent by stating, "The Commission believes that it was the intent of the General Assembly to require all covered EDCs to deploy smart meters system-wide when it included a requirement for smart meter deployment "in accordance with a depreciation schedule not to exceed 15 years." A person of normal intelligence would read this to mean accounting depreciation, not universal deployment. (page 14 of 35)
- D. This document further states, "It is this system-wide deployment that will provide the foundation for the EDCs' smart meter installation plans." Both the language of Act 129 and the legislative intent as stated in the Senate Journal when House Bill 2200

was passed contradict this statement. Therefore, this document is illegitimate and not in compliance with Act 129. (page 14 of 35)

- E. On page 27 it states, “we will not required EDCs to allow customers and their designated agent to tamper or physically access the meter itself.” Nowhere in this document, even in that section, does it refer to safety or health of the customer.

III. Met-Ed’s PD -3: Joint Petition of Metropolitan Edison Company, Pennsylvania Electric Company and Pennsylvania Power Company for Approval of its Smart Meter Technology Procurement and Installation Plan, Docket No. M-2009- 2123950 (Order dated June 9, 2010).

- A. None of the parties to this document were present and therefore the information is hearsay.
B. This document is in violation of the provisions of Act 129 of 2008.
C. This document specifies how smart meters will be delayed during a “grace period.”
A “grace period” is not provided for in Act 129. [page 9]

IV. Met- Ed’s PD -4: 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 (Final Order entered June 25, 2014).

- A. None of the parties to this document were present and therefore the findings and information contained therein are hearsay.

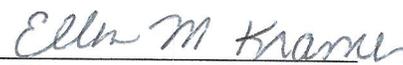
V. Met-Ed’s PD -5: Smart Meter Customer Privacy Policy for Metropolitan Edison Company, Pennsylvania Electric Company, Pennsylvania Power Company and West Penn Power Company, Docket Nos. M-2013- 2341990, M-2013- 2341991, M-2013- 2341993, and M-2013- 2341994 (Secretarial Letter dated May 1, 2015).

- A. This is a letter that was addressed to Lauren Lepkoski who was at the hearing but not sworn in nor testified. Therefore, without such testimony, the background or applicability of this letter is hearsay.

THEREFORE,

1. We move the Court to not accept these exhibits.
2. We move the Court to extend the deadline for submission of our exhibits until September 30, 2020 in order to enable us to work through the vast amount of potential documents considering our vision issues.


Larry R. Kramer


Ellen M. Kramer

August 14, 2020

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

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

Certificate of Service

We hereby certify that we have this day served a true copy of the enclosed Objections to the Exhibits of Met-Ed at the June 29, 2020, Hearing upon the individuals listed below, in accordance with the requirements of 52 Pa. Code § 1.54.

Service by efile and email as follows:

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Dated: August 14, 2020


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