

331 Shady Ridge Drive  
Monroeville, Pennsylvania

October 23, 2020

*Via eMail Filing per Direction of Dan Pallas, PA PUC*

Judge Jeffrey Watson  
PA PUC Pittsburgh Administrative Law Judge Office  
301 Fifth Ave, Suite 220  
Piatt Place  
Pittsburgh, PA 15222

RE: **Michele Hriadil and Francis Hriadil v. Duquesne Light Company**  
Docket No. C-2016-2571726

Cc: Jeremy V Farrell, Esquire, Counsel for Duquesne Light Company  
Rosemary Chiavetta, Secretary, Pennsylvania Public Utility Commission

Dear ALJ Watson:

Enclosed please find a copy of Complainants'

Motion for Summary Judgment

A copy of this document along with its certificate of service has been served upon the Respondent's Counsel, Jeremy V Farrell, Esquire, and provided to PUC Secretary Chiavetta, in accordance with Commission regulations.

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

Sincerely,



Francis Hriadil  
Complainant  
(412) 779-3314  
hriadil@attglobal.net

Enclosure





2. As such, the issue of the legality of the Public Utility Commission's 2009 Implementation Order mandating the universal deployment of Smart Meters has now been settled in law, and has been ruled as incorrect and in violation of Act 129.

3. It is a matter of record, that the Complainants have refused this Smart Meter program, for a number of legitimate reasons. We have never requested to opt-in to this Smart Meter program. We have never requested a Smart Meter. And, we have never agreed to pay the cost of a Smart Meter. Both the Respondent and the Commission have been properly informed of this in writing.

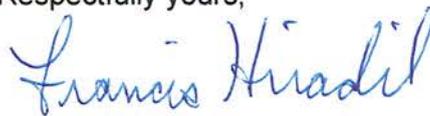
WHEREFORE, in light of these circumstances, Complainants Michele Hriadil and Francis Hriadil wish and respectfully request that Your Honor:

1. grant an immediate Summary Judgment in favor of the Complainants, our Complaint, and our request for relief; and against the Respondent,
2. and order that the Respondent

not install its Smart Meter on our residence at 331 Shady Ridge Drive; Monroeville, Pennsylvania,

and immediately remove the Smart Meter it has installed improperly on our property at 810 Selby Way; Pittsburgh, Pennsylvania, against our expressed wishes and written notifications, and in violation of this Formal Complaint proceeding, and replace it, in a safe manner, with an electro-mechanical, analog, non-RF-emitting electric meter.

Respectfully yours,



Francis Hriadil  
(412) 779-3314  
331 Shady Ridge Drive  
Monroeville, Pennsylvania  
October 23, 2020

THEREFORE,

IT IS ORDERED:

1. That the motion for summary judgment by the Complainants, Michele Hriadil and Francis Hriadil, for their complaint and request for relief, filed at Docket No. C-2016-2571726, is granted.

2. That the Respondent not install its Smart Meter on the Complainants' residence at 331 Shady Ridge Drive; Monroeville, Pennsylvania.

3. And, that the Respondent immediately remove the Smart Meter it has improperly installed on the Complainants' property at 810 Selby Way; Pittsburgh, Pennsylvania in violation of this proceeding, and replace it, in a safe manner, with an electro-mechanical, analog, non-RF-emitting electric meter.

Date: \_\_\_\_\_

\_\_\_\_\_  
Jeffrey A. Watson  
Administrative Law Judge

