

November 15, 2024

**Via Electronic Filing and Regular Mail**

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

**RE: Pamela Scott v. Duquesne Light Company**  
Docket No. C-2018-3004042  
EXCEPTIONS OF PAMELA SCOTT - COMPLAINANT -  
TO THE INITIAL DECISION OF THE ADMINISTRATIVE LAW JUDGE

Dear Secretary Chiavetta:

Enclosed please find EXCEPTIONS OF PAMELA SCOTT - COMPLAINANT - TO THE INITIAL DECISION OF THE ADMINISTRATIVE LAW JUDGE that is due on or before Monday, November 18, 2024.

A copy of this letter and document has been served upon ALJ Jeffrey A. Watson, Jeremy V. Farrell of Tucker Arensberg (attorney for Duquesne Light Company), and Emily M. Farah (Counsel, Regulatory, Duquesne Light) in accordance with Commission regulations. In addition, per your request in your letter dated October 29, 2024, a courtesy copy of these Exceptions has been e-mailed to the Commission's Office of Special Assistants.

What is the reason that Pennsylvania is the only state in the country that allows its Supreme Court prescription for medical exemptions to be overruled by a for-profit investor-owned utility's arbitrarily-conceived and arbitrarily-inserted tariff rule? ("Customers may not decline smart meter installation for any reason. Instead, as their sole remedy, customers may designate an alternative location on the premises for the smart meter.")

The Commission should not be in the business of approving tariff rules that defy the Supreme Court of Pennsylvania.

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: EXCEPTIONS OF PAMELA SCOTT - COMPLAINANT - TO THE INITIAL DECISION OF  
THE ADMINISTRATIVE LAW JUDGE  
Certificate of Service

Cc: ALJ Jeffrey A. Watson (with enclosure)(via electronic filing and regular mail)  
Jeremy V. Farrell, Esq. (with enclosure)(via electronic filing and regular mail)  
Emily M. Farah, Esq. (with enclosure)(via electronic filing and electronic mail)  
Commission's Office of Special Assistants (with enclosure)(via electronic mail)  
Michelle Henry, Dave Sunday, Debra Bogen, Christy Donofrio, Chad Dion Lassiter,  
Joseph R. Biden, Donald J. Trump, John Fetterman, Bob Casey, Dave McCormick,  
Chris Deluzio, Wayne Fontana, Dan Miller (all with enclosure)



**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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

**EXCEPTIONS OF PAMELA SCOTT - COMPLAINANT -  
TO THE INITIAL DECISION OF THE ADMINISTRATIVE LAW JUDGE**

Complainant Pamela Scott, in accordance with Secretary Chiavetta's cover letter of October 29, 2024, hereby submits to the Commission her Exceptions to the Initial Decision of Presiding Administrative Law Judge (ALJ) Jeffrey A. Watson. Complainant is submitting these Exceptions ahead of the November 18, 2024, deadline.

Given the 40-page limit and the desire to be as concise and succinct as possible, Complainant is limiting her Exceptions to the following five exceptions.

**EXCEPTION NUMBER 1: ALJ Watson erred in mischaracterizing the relief Complainant is seeking.**

ALJ Watson ignored the relief clearly requested by Complainant in her January 8, 2024, Supplemental Brief:

ALJ Watson avers that "The only relief or accommodation requested by Complainant was that the Commission not allow Respondent to terminate her service until this dispute is resolved due

to the misinterpretation of state law or until a state law is specifically passed to specifically allow opt-out from smart meter programs." (p. 29, ¶ 4, Initial Decision)

In reality, Complainant clearly requested additional relief in her January 8, 2024, Supplemental Brief: "Complainant asks Duquesne Light Company to have mercy and allow Complainant to keep her current analog meter, perhaps charging a reasonable fee for it to be manually read, and utilizing estimated bills between reading intervals. The Supreme Court of Pennsylvania has ruled that EDCs are permitted to provide opt outs as a customer service policy. (p. 4, Complainant's Supplemental Brief, January 8, 2024).

In addition, Complainant had asked for the PAPUC to "order that Duquesne Light not be allowed to install such digital smart meter, which emits radio frequency (RF) twenty-four hours a day. The Commission should order that the Complainant shall receive a **medical exemption** from Duquesne Light Company and be allowed to keep her long-lived current glass analog smart meter which contains an ERT [Tr. at 327, line 3] that emits RF at a maximum of 'one time a day' or possibly 'every 15 minutes' [Tr. at 163, line 1; Tr. at 328, line 13]. Such a medical exemption order would violate no Commission order, regulation, Commission-approved tariff, statute, or any aspect of the PUC Code or Act 129 of 2008. In fact, it would be in compliance with those and at the same time save ratepayer monies and help shield Duquesne Light Company and the Pennsylvania Public Utility Commission from future liability claims." (p. 2, Complainant's Post-hearing Main Brief, July 24, 2020) (emphasis added)

**EXCEPTION NUMBER 2: ALJ Watson erred by improperly weighing the evidence in the record and completely ignoring all of the Complainant's testimony, formal complaint, and filings regarding the adverse health effects she suffers from microwave radio frequency (RF) exposure, particularly from the Duquesne Light Company ("DLC") smart meter mesh network that she is enmeshed in.**

On August 16, 2022, the Supreme Court of Pennsylvania (PASC) ruled that "Act 129 does not provide customers with the right to opt-out of smart meter installation at their residence", but that "they may file a complaint with the Commission raising a claim that installation of a smart meter violates Section 1501 of the Code, 66 Pa.C.S. § 1501" with respect to unsafe and/or unreasonable service. "The Supreme Court reiterated that complainants seeking relief from the Commission must satisfy their burden of proof by a preponderance of the evidence." (Commission Order

adopted November 9, 2023; entered November 14, 2023)

The PASC explained on page 48 of its decision that "**complainant may prove Section 1501 claim through complainant's own personal testimony** and/or 'testimony of others as well as other evidence that goes to that issue'" [Romeo v. Pa. Pub. Util. Comm'n, 154 A.3d 422, 430 (Pa. Commw. 2017) (emphasis added)]. Further, Povacz II explains that "To establish a sufficient case and satisfy the burden of proof, the Complainant must show that the respondent utility is responsible or accountable for the problem described in the Complaint. ... At the hearing, **a complainant may prove his/her claim through the complainant's own personal testimony** and/or 'the testimony of others as well as other evidence that goes to that issue.' [Atuahene v. PECO Energy Company, No. C-2019-3012904, 2021 WL 3032744, at \*3, \*5 (Pa. P.U.C. May 21, 2020)" (emphasis added)]. See p. 48 of Opinion and Order, Povacz, et al. v. Pa. Public Utility Commission, 280 A.3d 975 (Pa. 2022) ("Povacz II").

ALJ Watson failed to recognize that Complainant met her burden of proof by providing more than sufficient evidence to support a finding that she has been adversely affected by DLC's smart meter mesh network, and that she will continue to be adversely affected by it. She has exceeded her burden of proof by a preponderance of the evidence that a forced installation of a DLC smart meter on her property will constitute unsafe and unreasonable service in violation of Section 1501. For example:

"I would like to explain some more health effects that I have from wireless, I'm sorry, radio frequency. ... I had mentioned heart arrhythmias and palpitations, vertigo, and joint pain. In addition to those adverse health effects, I also experience headaches or pressure in the head, sometimes very sharp pains when I'm driving under a -- what are those cylinder -- the wireless antenna things. I experience around smart meters in particular, brain fog and something I call "fried face", where my face just aches for hours. Tr. 104-105.

Complainant testified that she experiences pressure in her head, dizziness, brain fog, and the feeling like her head is being scrambled when exposed to microwave RF radiation. Tr. 106.

Complainant testified that she experiences ill effects from RF at levels above 1.2 microwatts per square meter, as measured on her Cornet ED-88TPlus Electrosnog meter. Tr. 106-107.

Complainant testified that in the literature that DLC and the PAPUC use, that is equivalent to

0.00000012 milliwatts per centimeter squared, and that the smart meter industry, utilities, and utility commissions like to use mW/cm<sup>2</sup> because it makes people think the level is low. Tr. 107.

"I've never been able to use a cell phone without the scrambling pressure in my ears and head. And my first cell phone was, I think, around 2005, and so -- but I would only use them -- at that time I could use a cell phone -- these would be 1G, 2G -- only on speakerphone. I've never been a person who can hold a cell phone to their head like everybody else does, so I would use speakerphone only." Tr. 107.

Complainant testified that she's been electrosensitive to a certain degree most of her life (e.g., the "tingly, very unpleasant sensation" she experienced from a Xerox machine located two feet from her desk in an employer's office), but that she "really wasn't too bad" until after DLC's digital smart meters were installed in her neighborhood (August 2017). "During the intervening months between then and now, my electrohypersensitivity has been exacerbated. I can no longer even use a cell phone at all, to even text or on speakerphone. I can't be near a cell phone. ... I can't sit next to someone or near someone using their laptop wireless, for example. That is something that's happened only in the last few years since smart meters have been all through my neighborhood." Tr. 108-109.

Complainant testified that "Duquesne Light's smart meters are particularly painful for me. I've noticed, walking down -- I've tried to approach smart meters to take measurements with my electrosmog meter, and I start feeling really bad, really shaky, just unbelievably scary ill, when I, say, go two feet into a driveway with a 30-foot setback, so it's like 28 feet, I can't get closer than that without feeling ill. I can walk through my neighborhood on the sidewalk, but if I, you know, try to, like, go -- I mean, obviously with permission -- on a neighbor's property trying to, you know, read the meter, I can't get closer. Now, I did have an experience with a smart meter last week and it was -- I was 12 feet away, it was an indoor installation, and I just opened the door to the utility room and just took the measurements. It was 17.45 milliwatts per meter squared." Tr. 109-110.

Complainant testified about one of the specific, slightly-delayed adverse health effects from that seconds-long exposure that followed the immediate acute symptoms of the brain and body being microwaved and feeling that she would have a stroke or sudden cardiac arrest if she had to stay in that location for ten minutes. "So, 15 minutes after that, I experienced my eyes blurring. It felt like they had been bleached, as in being white with a gauze, white, bleached film over my

eyes, which persisted for three days. My eyes are still a little extra sensitive to light, and this is exactly one week after that experience with the smart meter from Duquesne Light at 12 feet." (Just like with a microwave oven where the food continues to cook after the microwave turns off, she then experienced burgeoning blurry and clouded vision in her eyes, as if they had been bleached. This persisted for three days, with her vision still negatively affected on the day of testimony.) Tr. 110.

This above incident represents a conclusive causal connection between the Complainant's adverse health effects and exposure to the microwave RF of a Duquesne Light Company smart meter. This is conclusive evidence of a definite negative health result from a Duquesne Light Company smart meter. It is not a possibility of harm, but a demonstrated actual harm.

Complainant testified regarding the headache pain and the feeling like your brain is being totally scrambled and microwaved. "It is just so horrible and so unnecessary. I can't understand why Duquesne Light wants to force smart meters on people who can't tolerate them physically." Tr. 110.

Complainant testified that with her level of increasing electrosensitivity to all forms of microwave radio frequency emissions since the deployment of DLC smart meters, she can no longer use any wireless devices and has to work hard to minimize her exposure to RF. Tr. 110-111.

Complainant testified that she began developing muscle weakness in the legs and arms in 2018. Tr. 111.

"It's interesting, and I want to point out, that when I'm away from Duquesne Light's smart meter armies, I regain muscle strength within 24 hours. So it's very interesting, and it's encouraging to me because this tells me that I can heal." Tr. 111.

Complainant gave a typical example of adverse health effects that she experiences from non-DLC microwave RF exposure: "I've been in situations where I -- there was a high school musical where a family friend performed. The seats, we thought we had third row front, and it turned out to be third row from the back. I walked in, and even before I could sit down, I just felt so sick, and, you know, I had to get out. I didn't know what was making -- I mean, I knew there was some RF somewhere there, but I didn't know where it was coming from immediately.

I looked, and I could see the -- you could actually see the wireless antennas from a -- something that would go to the microphones on stage. I had to leave. In other words, removing myself from the RF, then I'm okay. I mean, I may suffer ill effects for days, but I'm not, like, in a critical, acute -- you know: I get away from it, and my heartbeat, you know, normalizes." Tr. 111-112.

Complainant testified that in her house she is about 50 feet away from the two closest DLC smart meters. Complainant testified about her certainty that having a smart meter closer than that would "really damage my health." Tr. 109.

Complainant did not seek a medical diagnosis or medical documentation until 2023, hence the reason no medical documentation was entered into the record at the evidentiary hearing in March 2020.

ALJ Watson completely ignored complainant's personal testimony and briefs, dismissing solid evidence of harm as "personal beliefs".

Since 2018, Complainant uses no RF-emitting devices or appliances at all, and there are no RF-emitting water or gas utility meters on her property. Thus, the argument that "Complainant would be exposed to much higher levels of RF from many other existing sources, such as her phone, wireless router, and local broadcast stations. DLC Ex. G-2, G-3." holds no water and is immaterial in Complainant's case. By not providing the relief she has asked for and forcing a smart meter upon her, Respondent will be providing service that is unsafe and unreasonable due to her EHS. (No. 64, p. 17, Initial Decision)

Complainant presented credible evidence to support her allegations of the additional harm to her health that would occur if she was forced to have a DLC smart meter installed at her property. Respondent's evidence that its smart meters comply with all health and safety standards are immaterial because the fact of the matter is that Complainant experiences concerning health effects within 28 feet of a DLC smart meter. Placing a DLC smart meter on her property would eliminate the 50-foot distance she has in her indoor living space from each of her next door neighbors' DLC smart meters. She becomes more ill the closer she is to DLC smart meters, and placing one on her property would eliminate the attenuating factors of the smart meters closest to her indoor living space: each of those two meters is at least four interior walls away from her interior living space and most, if not all, on the interior side(s) have a lot of lead paint beneath

the newer layers of paint, which also helps attenuate RF. (Think of lead aprons in dental offices.)

Complainant suffers from electromagnetic hypersensitivity syndrome (EHS), is particularly sensitive to Duquesne Light Company's digital smart meters, cannot and does not use any RF-emitting devices in her home or daily life, and she has met her burden of proof.

Complainant must daily suffer from the usage of increasingly intense and debilitating wireless technology emanating from neighboring properties and the community, but she should not have to suffer from forced installation of smart meters on her own property which harmfully places such technology so much closer to her. [p.2, Complainant's Supplemental Brief, 1/8/24]

There is no statute that allows utilities to willfully submit customers to the interjection of hazards onto their property.

There is no statute that grants DLC or the PAPUC the right to render a customer's home uninhabitable to them. Arbitrarily depriving Complainant of her Fourteenth Amendment right to bodily integrity, Complainant will sustain grievous violations of bodily integrity if a DLC smart meter is installed on her property.

By completely ignoring Complainant's testimony and evidence about the adverse health effects she suffers from microwave RF radiation exposure, ALJ Watson failed to recognize that Complainant met her burden of proof.

**EXCEPTION NUMBER 3: ALJ Watson erred in denying both Complainant and Respondent the opportunity to re-open the evidentiary record to present additional evidence in light of Povacz II, thus dooming Complainant because she had not hired two expert witnesses way back in 2020 when that was not a required criteria for a Section 1501 claim.**

Unlike ALJs such as Gail M. Chiodo, who deemed it helpful to hold a post-evidentiary hearing conference to give the parties an opportunity to address various procedural matters, including whether either party sought an opportunity to re-open the evidentiary record to present additional or new evidence in light of Povacz II, ALJ Jeffrey A. Watson gave Complainant Scott and

Respondent DLC no opportunity to present new or additional evidence in light of Povacz II.

This means that Complainant Scott was required to meet a different burden of proof than the "preponderance of the evidence". Instead, ALJ Watson required her to meet a standard that was established years after Complainant's window to enter evidence ended. This means that Complainant and Respondent have both been denied their right to due process.

In 2022, the PASC set a new bar of requiring complainants to have both a scientific expert witness and a medical expert witness testify:

The PASC wrote: "The preponderance burden requires a customer to prove that a service or facility is — more likely than not — the cause of the problem described in their complaint. *See Popowsky v. Pa. Pub. Util. Comm'n*, 937 A.2d 1040, 1055 n.18 (Pa. 2007) (“This Court has characterized a preponderance of the evidence as tantamount to a ‘more likely than not’ inquiry[.]”). Specific to smart meters and RF emissions, the burden is two-fold. First, a customer must present expert opinion rendered to a reasonable degree of scientific certainty that smart meters emit RFs and that RF emissions cause adverse health effects and, second, expert opinion rendered to a reasonable degree of medical certainty that RF emissions from the smart meters, either alone or cumulative to other sources of RF emissions, caused them harm. *See PA SSJI (Civ) § 4.80* (“An expert witness gives his or her *opinion*, to a reasonable degree of professional certainty, based upon the assumption of certain facts.”). Once the customer produces such evidence, the utility may then defend by providing scientific and/or medical expert testimony that, within a reasonable degree of certainty, the RF emissions from smart meters did not cause the alleged harm. The fact finder must then weigh the evidence and decide whether it is more likely than not that the smart meter causes harm to the customer." (p. 48-49, Povacz II)

However, the PASC also said that an electric utility was not precluded from providing a reasonable accommodation to an electric customer in the absence of a Section 1501 violation pursuant to a customer service policy. (p. 7 Povacz II)

Oddly, the Supreme Court of Pennsylvania's intent to provide medical exemption accommodation to complainants who meet the new two-fold burden of proof is overruled by utilities' arbitrarily-inserted tariff rules like Rule 9B placed in DLC's tariff in 2019: "Customers may not decline smart meter installation for any reason. Instead, as their sole remedy, customers may designate an alternative location on the premises for the smart meter."

Rule 9B itself constitutes unsafe and unreasonable service from DLC because it prevents the occurrence of safe and reasonable service for all complainants who carry their burden of proof to establish a violation of Section 1501.

**EXCEPTION NUMBER 4: ALJ Watson erred in falling for the "duty cycle" ruse, averring that DLC smart meters do not emit microwave RF emissions 24/7 and naively concluding that the "duty cycle" is the only form of RF transmitted from a DLC smart meter.**

ALJ Watson averred that "Both radios in the Company's smart meters comply with the exposure limits set by the FCC, IEEE, and ICNIRP, **even if the radios operated all day long (which they do not)**. Tr. at 195, 198, 200, 259-60." (emphasis added) (No. 62, p. 16, Initial Decision).

ALJ Watson failed to recognize from the evidence that DLC smart meters transmit RF energy 24/7 and that the duty cycle is only a small subset of those 24/7 transmissions. This was clearly affirmed upon Complainant's cross-examination of DLC fact witness Michael Belanger (Senior Project Line Manager at Itron, Inc.) who testified that in addition to the LAN and Zigbee radio emissions, the electronics and power supply within the meter will have transmissions and emissions that are not part of the "intentional radio transmissions", and are both radiated RF emissions and emissions that are conducted onto the AC power line which occur constantly, 24/7, every minute, every second. Tr. 201-204.

Ms. Scott: "Mr. Belanger, are there any other emissions from these meters that we're discussing other than the Zigbee and the ... LAN radio?" Tr. 201.

Mr. Belanger: "Yes. Yeah, so to answer your question, you know, just like any other, you know, kind of digital device, you know, the electronics within the meter and the power supply within that meter will have some level of transmissions and emissions which the FCC, you know, calls spurious emissions, you know, that are not part of the intentional radio transmissions. Those spurious transmissions can become -- you know, be either through radio frequency like a radio or they could be conducted on the the AC power line. So, you know, there is a small level of the emissions that the devices will emit, you know, just by the nature of their operation." Tr. 201.

And later,

Ms. Scott: "So, do those spurious transmissions go on constantly, 24/7, every minute, every second?" Tr. 202.

Mr. Belanger: "Yeah, the nature of the spurious emissions are part of the digital electronics that are, you know, within the meters, so they -- there may be some variation, but they are, you know, mostly, you know, constant levels of spurious emissions." Tr. 202.

And later,

Ms. Scott: "These spurious emissions, is it fair to say that they occur onto the AC -- are conducted onto the AC power line 24/7?" Tr. 202.

Mr. Belanger: "It would be fair to say that, yes." Tr. 202.

Ms. Scott: "So what about the other spurious emissions that are not conducted onto the AC power line, are they also 24/7?" Tr. 202.

Mr. Belanger: "Yes. Those are, you know, fairly continual emissions." Tr. 203.

Ms. Scott: "How many minutes a day would you say that those emissions occur, the spurious transmissions?" Tr. 203.

Mr. Belanger: "Yeah, the spurious transmissions -- there will be spurious transmissions all day. The levels may vary slightly with some of the internal operation of the device, but there will be spurious emissions all day." Tr. 203.

Yet another additional source of emissions from DLC smart meters is the RF emitted when the "LAN radios will communicate with other meters in the vicinity to form what we call a mesh network. They'll discover their neighbors and they'll establish a path for each of the meters to communicate back to a take-out point or collector, you know, that is a field area router that is mounted on a pole, to get the two-way communications back to the utility head-end." (Michael Belanger to DLC attorney Jeremy V. Farrell on direct examination) Tr. 187.

In No. 70 on pages 17-18 of the Initial Decision, ALJ Watson also averred that the "duty cycle" is the only type of RF transmission emitted by DLC smart meters. He averred that the "estimated time that a Duquesne Light smart meter would transmit energy during a 24-hour period" was "commonly called the 'duty cycle'" (He averred "The estimated time that a Duquesne Light smart meter would transmit energy during a 24-hour period – commonly called the 'duty cycle' – was assessed through a study analyzing the deployment of roughly 13,000 OpenWay smart meters, which are being deployed by Duquesne Light. Tr. at 192-93; DLC Ex. E-2."). The testimony of DLC fact witness Michael Belanger solidly refuted ALJ Watson's averment that the duty cycle is the only type of RF energy emission from DLC smart meters.

**EXCEPTION NUMBER 5: ALJ Watson erred in averring that Complainant presented no evidence to support her claim that smart meters consume more energy than analog meters.**

ALJ Watson averred "Complainant presented no evidence to support her claim that smart meters consume more energy than analog meters." (No. 94, p. 20, Initial Decision)

In fact, upon cross-examination by Complainant, DLC's fact witness Michael Secchiutti (Manager of Advanced Metering Infrastructure (AMI) Operations for DLC) confirmed that a true analog meter consumes no energy:

Ms. Scott: "I have a question, Mr. Secchiutti, regarding the conversation you and Mr. Farrell had about electrical -- consumption of electricity by the smart meter as opposed to an analog meter as opposed to the meter I have on my house right now with the ERT. Could you clarify for us all that an analog meter such as mine without the ERF consumes no electricity, it simply measures it?" Tr. 336.

Mr. Secchiutti: "Yeah, but the meter, the analog meter that you have does have the ERT installed in it." Tr. 335.

Ms. Scott: "And, can you tell me how much electricity that consumes compared to the AMI smart meters?" Tr. 336.

Mr. Secchiutti: "Yeah, I -- the meter itself, I mean, it's supplied -- you know, the electronics in the meter is supplied by the line side of the meter, which is the Duquesne Light side, so that

consumption, you know, doesn't go through the metered or the measurement part of the meter. You know, I'm not -- you know, I don't have that information, you know, how much that electronics consumes exactly." Tr. 336.

Ms. Scott: "So then you really can't say that I was wrong that the smart meter consumes -- wastes more -- in my opinion, wastes more energy than the existing meter that I have now that only emits, you said, once a day; is that accurate, it only emits once a day? It doesn't have -- use as much electricity for the ERT as a smart meter. The issue is not whether I'm paying for it or not; the issue that I'm trying to make is that it's wasting electricity, and that Duquesne Light should allow some of these older systems to remain, because it actually wastes energy." Tr. 337.

Mr. Secchiutti: "Yeah, I would only be able to say that, you know, we've powered that up, you know, from the line side on the company side. I don't have, you know, what the actual usage of that electronics actually is. You know, I don't have that information. I don't know that information from the ERT or the AMI meters, so I couldn't really comment on, you know, how much is used there." Tr. 336-337.

Another of DLC's fact witnesses, Ronald Dornin (Interim Manager of Maintenance Program Planning for DLC) when asked by Complainant on cross-examination about the amount of power that the ERT component consumes compared to the amount of power that these AMI smart meters consume, answered "Unfortunately, I cannot provide you an answer to that question." Tr. 348.

As the evidence above shows, smart meters consume energy and pure analog meters do not. This is relevant because Act 129 was supposed to decrease electricity use, not increase demand for it.

Respectfully submitted,

/s/

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Pamela Scott, Complainant (E-filed on November 15, 2024)  
134 Markham Drive  
Pittsburgh, PA 15228-1008  
(412) 998-8880

**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 the November 15, 2024, EXCEPTIONS OF PAMELA SCOTT - COMPLAINANT - TO THE INITIAL DECISION OF THE ADMINISTRATIVE LAW JUDGE upon the parties, listed below, in accordance with the requirements of 52 Pa. Code Section 1.54 (relating to service by a party).

VIA ELECTRONIC FILING, REGULAR MAIL, AND ELECTRONIC MAIL:  
Jeremy V. Farrell, Esq., Tucker Arensberg, P.C.  
1500 One PPG Place  
Pittsburgh, PA 15222  
jfarrell@tuckerlaw.com

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  
layfoster@pa.gov

VIA ELECTRONIC FILING AND ELECTRONIC MAIL:  
Emily M. Farah, Esq., Counsel, Regulatory, Duquesne Light Company  
411 Seventh Avenue  
Pittsburgh PA 15219  
efarah@duqlight.com, bhargenrader@duqlight.com

VIA ELECTRONIC FILING AND ELECTRONIC MAIL:  
PAPUC Office of Special Assistants  
ra-OSA@pa.gov

Dated this 15th day of November, 2024

/s/

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

