

December 13, 2024

Via Electronic Filing

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Keystone Bldg. 2nd Floor W
400 N. Street
Harrisburg, PA 17120

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

Dear Secretary Chiavetta:

Enclosed please find Duquesne Light Company's Answer to Complainant's Petition to Reopen.

A copy of this document has been served upon Complainant in accordance with Commission regulations.

Sincerely,



Jeremy V. Farrell
Attorney for Duquesne Light Company

Enclosure

c: Pamela Scott (w/enc.) (via regular mail)
Administrative Law Judge Jeffrey Watson (w/enc.) (via email)

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

PAMELA SCOTT,

Complainant,

No: C-2018-3004042

v.

DUQUESNE LIGHT COMPANY,

Respondent.

**ANSWER TO COMPLAINANT'S
PETITION TO REOPEN**

Served on Behalf of Respondent
Duquesne Light Company

Counsel of Record for this Party:

Jeremy V. Farrell, Esquire
PA I.D. No. 316258

Tucker Arensberg, P.C.
1500 One PPG Place
Pittsburgh, PA 15222
(412) 594-3938
jfarrell@tuckerlaw.com

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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

ANSWER TO COMPLAINANT’S PETITION TO REOPEN

Respondent Duquesne Light Company (“Duquesne Light” or the “Company”) files its Answer to the Petition to Reopen filed by Complainant Pamela Scott.

I. INTRODUCTION

Complainant seeks to reopen this proceeding, shortly after filing Exceptions, to offer expert evidence she has already attempted to offer before based on her assertion that there have been unspecified “additions to the scientific and medical bodies of knowledge” and “new rulings in the Commonwealth Court of Pennsylvania and the Supreme Court of Pennsylvania” regarding the health and safety of smart meters. Complainant’s assertions are wrong, and her request should be denied. There have been no material changes of fact or law or other good cause warranting reopening the record. Complainant had years to develop her case, knew Duquesne Light was offering expert testimony, knew she could offer her own expert testimony, and attempted unsuccessfully to do so. The Petition should be rejected, and Complainant’s Exceptions decided on the existing record and settled law.

II. BACKGROUND AND PROCEDURAL HISTORY

On August 16, 2018, Complainant filed a Formal Complaint with the Commission against Duquesne Light. See Complaint (filed on August 16, 2018); Initial Decision, p. 1. The Formal Complaint alleges that Duquesne Light is not permitted to install a smart meter at her residence, that it is not permitted to shut off her electric service for refusal to allow a smart meter to be installed, and that she is entitled to an exemption because the Company's smart meter allegedly causes her adverse health conditions. See Complaint; Initial Decision, p. 1. Complainant seeks to prevent the Company from terminating her service until this dispute is resolved or until a state law is passed to permit an opt-out from smart meter programs. See Complaint; Initial Decision, p. 2. On September 5, 2018, the Company filed its Answer and New Matter in which it denied Complainant's allegations and asserted that it is required by Act 129 to install a smart meter at the service addresses of all customers within its service territory, including Complainant. See Answer and New Matter; Initial Decision, p. 2.

On September 24, 2018, Duquesne Light served its First Set of Discovery Requests Directed to Complainant ("Discovery Requests"). See Duquesne Light's Certificate of Service dated September 24, 2018. Of relevance here, Discovery Requests Nos. 22, 23, and 24 contained requests for information regarding Complainant's intended expert witnesses. Complainant provided no substantive response to these discovery requests in her Answers, other than stating that the subject matter on which her experts were expected to testify is "smart meters and EHS [electromagnetic hypersensitivity]." A copy

of the relevant pages from Complainant's Discovery Responses are attached as Exhibit A.

On August 9, 2019, Complainant served Duquesne Light with Complainant's List of Potential Witnesses ("Complainant's Witness List"). Complainant's Witness List identified six potential fact witnesses and **three potential expert witnesses**. A copy of Complainant's Witness List is attached as Exhibit B (emphasis added). Duquesne Light moved to preclude all of Complainant's proposed witnesses. See Motion to Compel Discovery Responses and to Preclude Witnesses Identified in Complainant's List of Potential Witnesses From Testifying (filed on Oct. 1, 2019). The Presiding ALJ precluded five of Complainant's six proposed fact witnesses and two of Complainant's three proposed expert witnesses; he did not rule on whether the third proposed expert witness - Mr. Joshua Hart - would be permitted to testify. See Interim Order Granting in Part, Respondent's Motion to Preclude Witnesses Identified in Complainant's List of Potential Witnesses From Testifying (issued on Oct. 28, 2019).

On January 24, 2020, the Company filed a Motion *In Limine* seeking to preclude Complainant from offering Mr. Hart as an expert witness because Mr. Hart is not qualified to offer expert testimony about alleged "adverse health effects from smart meter installations" and Complainant failed to provide the Company with the substance of the facts and opinions to which he was expected to testify, the grounds for each opinion, or a valid expert report or curriculum vitae for Mr. Hart. See Respondent's Motion *In Limine* to Preclude Joshua Hart From Testifying As Expert Witness, pp. 4-6; Initial Decision, pp. 4-5. The Presiding ALJ entered an Interim Order on February 25, 2020, precluding any

testimony from Mr. Hart, beyond the fair scope of an email communication from Mr. Hart to the California Council on Science and Technology dated January 27, 2011. See Interim Order (filed Feb. 25, 2020).

An evidentiary hearing was held on March 12, 2020. See Initial Decision, p. 6. At the hearing, Duquesne Light presented its case through the expert witness testimony of Dr. Benjamin Cotts and Dr. Gabor Mezei, and fact witness testimony of Michael Belanger, Steve Wright, Michael Secchutti, and Ronald Dornin. See Initial Decision, pp. 10-12. Complainant presented her case through the fact witness testimony of herself and Mr. Hart, who notably is not a medical doctor, epidemiologist, public health professional, certified electrician, or electrical engineer. See initial Decision, p. 9. In fact, Mr. Hart had not even met Complainant prior to the hearing and had never seen any medical records regarding the health symptoms identified by Complainant, including electrohypersensitivity syndrome, and had never talked to her treating physicians. See Initial Decision, p. 9. The evidentiary record was closed on June 3, 2024.

The Initial Decision of Administrative Law Judge Jeffrey A. Watson (“ALJ”) was issued by Secretarial Letter dated October 29, 2024. Therein, the Presiding ALJ dismissed the Formal Complaint and rejected Complainant’s arguments by holding that Act 129 mandates smart meter deployment and requires the system-wide installation of smart meter technology by EDCs. See Initial Decision, p. 24. The Initial Decision also held that Complainant presented no medical evidence, witnesses, or records at the hearing demonstrating that RF emitted from a smart meter will harm her. Id. at 81. Instead, Complainant presented her lay opinions and beliefs regarding concerns about health,

safety, and privacy in connection with smart meters. Id. at 29. It further held that Complainant's personal beliefs alone do not constitute evidence sufficient to support her claims and thus she failed to carry her burden of proof establishing that Duquesne Light violated the PUC or a regulation or order of the Commission in attempting to install a smart meter at her property. Id. Accordingly, the Presiding ALJ found that Complainant's claims are not supported by the evidence and must be dismissed. Id. at 35.

On November 15, 2024, Complainant filed Exceptions. The Company filed its Reply to Complainant's Exceptions on December 2, 2024. See Respondent's Reply to Complainant's Exceptions (filed Dec. 2, 2024).¹ The Exceptions and Reply are currently pending before the Commission for disposition.

On December 3, 2024, Complainant filed a Petition to Reopen the proceeding for the purpose of taking additional evidence. In her Petition, Complainant reiterates one of her arguments in her Exceptions in which she seeks to "be given the opportunity to meet the new standard that the PAPUC has imposed upon cases" by presenting expert witness testimony. See Petition, pp. 3-5.

Not only has Complainant failed to meet her burden to demonstrate that there has been a material change of fact or law since the conclusion of the hearing that warrants reopening the record, but also Complainant *has already had the chance to-and actually attempted to*-introduce the expert testimony she now seeks to offer. Complainant's

¹ The Company incorporates by reference its Reply to Complainant's Exceptions as if stated fully herein.

displeasure with the ruling on her proposed expert testimony and her Formal Complaint does not constitute grounds for reopening the record.

III. LEGAL STANDARD

Under 52 Pa. Code § 5.571(a), a party may petition to reopen the record for the purpose of taking additional evidence in a proceeding, at any time after the record is closed but before a final decision is issued. The petitioner bears the burden of proof to establish sufficient grounds for reopening the proceeding, including material changes of fact or law that have allegedly occurred since the conclusion of the hearing. 52 Pa. Code § 5.571(b). A petition to reopen will only be granted if there is reason to believe: “(1) that conditions of fact or law have so changed as to require, or that the public interest requires, the reopening of the proceeding; and (2) that the party seeking to reopen the proceeding has demonstrated ‘good cause’ for the admittance of this evidence.” 52 Pa. Code § 5.571(d).

IV. ARGUMENT

Complainant again argues that the Commission imposed a new standard upon smart meter Complainants via the Supreme Court of Pennsylvania’s holding in PovacZ II and thus she should be given yet another opportunity to hire expert witnesses. See Petition, pp. 3-5.² However, as explained in Duquesne Light’s Reply to Complainant’s Exceptions, it is inaccurate to claim that the Supreme Court created a new “expert witness” requirement in PovacZ II; it instead confirmed existing law on the “conclusive

² Complainant’s Argument in her Petition is essentially the same argument previously raised in her Exception No. 3. See Complainant’s Exceptions, pp. 7-9.

causal connection” standard. See Respondent’s Reply to Complainant’s Exceptions, pp. 16-18 and referenced authority.

For the reasons explained in Duquesne Light’s Reply, as well as those more fully explained in the Initial Decision, Complainant failed to meet her burden to establish by a preponderance of the evidence that Duquesne Light violated the Public Utility Code, the Commission’s regulations or orders, or the Company’s Commission-approved tariff. Complainant now seeks a second bite at the apple by seeking to reopen the record for the purpose of introducing additional evidence through expert witnesses. In addition, Complainant requests an opportunity to present evidence of an alleged “medical diagnosis of EHS.” Throughout this proceeding, Complainant apparently “reasoned that she would be able to prove her Section 1501 claim through her own personal testimony;” however, a pro se complainant’s lack of knowledge regarding the substantive law governing her claim is a risk they live with by proceeding pro se. See Petition, p. 3; Ray H. Rosenblum v. Bell Atlantic-Pennsylvania, Inc., Docket No. F-00236844, 1995 LEXIS 79, at *28 (Pa. P.U.C. Sept. 29, 1995) (citing Vann v. Unemployment Comp. Bd. of Review, 494 A.2d 1081, 1085-86 (Pa. 1985) (“any layperson choosing to represent himself in a legal proceeding must, to some reasonable extent, assume the risk that his lack of expertise and legal training will prove his undoing”)).

Complainant’s Petition fails to meet the strict legal standard necessary to reopen the proceeding, which requires a material change of fact or law—neither of which Complainant articulated in her Petition. The Petition claims in conclusory fashion that “there have been new rulings in the Commonwealth Court of Pennsylvania and the

Supreme Court of Pennsylvania (“PASC”) that created numerous new changes in the criteria that Complainants did or did not have to meet in order for their cases to prevail;” however, Complainant merely cites to two cases throughout her entire Petition: Brown v. Los Angeles Unified School Dist., 60 Cal. App. 5th 1092 (Cal. Ct. App. 2021) and Povacz v. State PUC, 280 A.3d 975 (Pa. 2022). Brown is a California case with no relevance or bearing on this smart meter case. It dealt with an employment discrimination claim under the Americans with Disabilities Act (“ADA”) and the California Fair Employment and Housing Act (“FEHA”).

Furthermore, Complainant’s characterization of Povacz II as a material change of law as it relates to the “conclusive causal connection” standard is also misplaced. Complainant was not required to meet a different burden of proof than the “preponderance of the evidence standard” which has been used in RF emissions cases “for almost three decades.” Povacz, 280 A.3d at 1004. The Supreme Court of Pennsylvania has clearly articulated that in cases “where scientific evidence is required to establish the safety of a service or facility, use of the evidentiary standard of ‘conclusive causal connection’ to assess the evidence is correct.” Id. at 1007.

Moreover, scientific and medical subject matter have been matters ripe for expert testimony since well before Povacz II, as made obvious by the fact that Complainant herself sought to introduce expert testimony in this very matter before Povacz II was decided. See Cynthia Randall and Paul Albrecht v. PECO Energy Company, Docket No. C-2016-2537666, 2019 LEXIS 160, at *21-22 (Pa. P.U.C. May 9, 2019) (“In order to carry [the preponderance of the evidence] burden of proof, the Complainant may be required

to present evidence in the form of medical documentation and/or expert testimony.”); Nelson Hess v. PPL Electric Utilities Corp., Docket No. C-2018-3003337, 2020 LEXIS 495, at *14–15 (Pa. P.U.C. Oct. 8, 2020) (“We have previously concluded that lay witness testimony is insufficient to establish a conclusive causal connection between adverse health effects and the RF fields from an AMI meter Rather, an unequivocal expert opinion, offered to a reasonable degree of medical or scientific certain [sic], is required to satisfy a Complainant’s initial burden of proof and to shift the burden of production to the respondent.”); Kim Betchy v. West Penn Power Company, Docket No. C-2018-3000257, 2020 LEXIS 515, at *13 (Pa. P.U.C. Oct. 8, 2020) (rejecting Complainant’s claims under the conclusive causal connection standard for failure to provide any expert testimony).

From the beginning of this proceeding, Complainant knew that (1) Duquesne Light intended to introduce expert testimony and (2) she had the opportunity to present her own expert testimony as well, if she so desired. In fact, on October 15, 2018, the Presiding ALJ entered an Interim Scheduling Order in which he stated, “**ON OR BEFORE January 25, 2019**, any party **wishing to present expert testimony** (including but not limited to medical, technical, etc.) must provide to the other party in writing, the name and business address of that expert and a written summary of the expected testimony of that expert.” See Interim Order Establishing Litigation Schedule (Oct. 15, 2018) (emphasis

added).³ The Company also provided Complainant with a list of its factual and expert witnesses that it intended to produce at the hearing, which included the two expert witnesses who ultimately issued reports and testified at the hearing. See Certificate of Service of Respondent's List of Potential Witnesses (Feb. 21, 2019).

Complainant's argument that she was not given the opportunity to present expert testimony is fundamentally incorrect. Complainant availed herself of this opportunity by attempting to present expert testimony at the hearing. See Tr. at 46-47, 54-55, 64, 77, 76-79; however, her "expert," Mr. Hart, did not meet the qualifications to provide expert testimony. Id. Complainant also availed herself of this opportunity during discovery by providing a list of proposed expert witnesses; however, her "expert" witnesses were precluded from testifying for various reasons. See Interim Order Granting in Part, Respondent's Motion to Preclude Witnesses Identified in Complainant's List of Potential Witnesses From Testifying (issued on Oct. 28, 2019). Despite having every opportunity to offer expert testimony that satisfied the standards of settled Pennsylvania law and present her best case at the March 2020 hearing, she simply opted not to retain experts that were qualified to testify about the subject matter Claimant wanted them to. This is not a basis to reopen the record and disturb the Presiding ALJ's well-reasoned Initial Decision.

³ The Company notes that the Presiding ALJ entered subsequent Interim Orders Amending the Initial Litigation Schedule (Nov. 8, 2018 & July 23, 2019) which also notified Complainant of the opportunity to present expert testimony.

Further, Complainant failed to demonstrate a material change of fact. Notably, the Petition blanketly states that “Since March 2020, additions to the scientific and medical bodies of knowledge have ballooned regarding 1) Electromagnetic Hypersensitivity Syndrome (“EHS”), and 2) biological effects from microwave radio frequency (“RF”) radiation emissions;” yet Complainant fails to describe the specific medical or scientific change of fact which she purportedly relies on. See Petition, p. 3. Nor does Complainant suggest that these “additions” in any way undermine the testimony credited as believable by Duquesne Light at the March 2020 hearing.

Reopening the record to entertain speculative arguments on the same general subject matter that Complainant has already testified about would be a substantial waste of time and judicial resources for both the Commission and the Company and thus would not be in the public interest. Despite Complainant’s assertions regarding an alleged EHS diagnosis and expert witnesses, Complainant fails to identify the supposed experts she desires to produce or even on what subjects her experts would be expected to testify about. The reality is that, by the time of the hearing, Complainant was well aware of the expert witness requirements and her burden of proof for alleged Section 1501 violations. Complainant was given ample time to seek competent expert medical opinion had she so desired. She simply did not do so. Complainant has failed to demonstrate “good cause” as to why her alleged evidence should be admitted; therefore, her Petition must be denied.

V. CONCLUSION

Duquesne Light respectfully requests that the Commission deny Complainant's Petition to Reopen, adopt the Initial Decision, and dismiss the Formal Complaint. Complainant has failed to meet her legal burden to demonstrate a material change of fact or law that would warrant reopening the evidentiary record. Further, Complainant has already attempted to avail herself of the relief she seeks through proposed expert testimony, which the Presiding ALJ correctly precluded at the March 2020 hearing. Complainant's dissatisfaction with the disposition of this case is no basis to reopen the record.

Respectfully submitted,

TUCKER ARENSBERG, P.C.



By: _____

Jeremy V. Farrell, Esquire
Pa. I.D. No. 316258
1500 One PPG Place
Pittsburgh, PA 15222
(412) 566-1212
jfarrell@tuckerlaw.com

**Counsel for Respondent,
Duquesne Light Company**

Discovery Request #22: *State the full name, address, and telephone number of each person who You expect to call to testify as an expert witness at any hearing of this matter and, for each expert witness, state: a. The subject matter on which the expert is expected to testify; b. The substance of the facts and opinions to which the expert is expected to testify; and c. A summary of the grounds for each expert opinion.*

Answer to Discovery Request #22: I am in the process of identifying the full names, addresses, and telephone numbers of each person that I expect to offer testimony "at any hearing of this matter", therefore I have no names, addresses, or telephone numbers of such persons at this time. The subject matter on which the experts are expected to testify is smart meters and EHS.

Discovery Request #23: *Produce the report of any expert You intend to call to testify on Your behalf at trial.*

Answer to Discovery Request #23: I do not have any Documents currently or formerly in my possession, custody, or control that are responsive to this request.

Discovery Request #24: *Produce the curriculum vitae of any expert that You intend to call to testify on Your behalf at trial.*

Answer to Discovery Request #24: Given that I am in the process of identifying and securing expert testimony, I do not have any Documents currently or formerly in my possession, custody, or control that are responsive to this request.

Respectfully submitted,



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

Exhibit A

August 9, 2019

Via Regular Mail

Jeremy V. Farrell, Esq. and
Paul Shane Miller, Esq.
Tucker Arensberg, P.C.
1500 One PPG Place
Pittsburgh, PA 15222

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

Dear Messrs. Farrell and Miller:

Enclosed please find Complainant's list of potential witnesses.

Thank you for your attention to this matter.

Sincerely,



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

Encl: List of Potential Witnesses
Certificate of Service

Cc: ALJ Jeffrey A. Watson (with enclosure)

Exhibit B

**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
LIST
OF
POTENTIAL
WITNESSES**

Filed by Complainant
Pamela Scott
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.	:	

COMPLAINANT'S LIST OF POTENTIAL WITNESSES

Complainant Pamela Scott, in accordance with Administrative Law Judge Jeffrey A. Watson's Interim Order Establishing Revised Litigation Schedule dated July 23, 2019, identifies the following individuals who she may call as fact or expert witnesses at the hearing of this matter.

EXPERT WITNESSES

1. David C. Mowery
William A. & Betty H. Hasler Professor Emeritus of New Enterprise Development
Business and Public Policy
Haas School of Business
University of California, Berkeley
2220 Piedmont Ave.
Berkeley, CA 94720

Dr. Mowery would offer expert testimony and opinion regarding the public policy and inadvisability of mandating smart meters as a condition of electric service, including the economic ramifications of doing so.

2. M. Granger Morgan
Hamerschlag University Professor of Engineering
Department of Engineering and Public Policy
Carnegie Mellon University
129 Baker Hall
Pittsburgh, PA 15213

Dr. Morgan would offer expert testimony and opinion regarding the public policy and inadvisability of mandating smart meters as a condition of electric service, including the economic ramifications of doing so.

3. Joshua Hart MSc, Director
Stop Smart Meters
P.O. Box 682
Portola, CA 96122

Mr. Hart would offer expert testimony and opinion regarding adverse health effects from smart meter installations.

FACTUAL WITNESSES

1. Thomas L. Stevenson, Attorney
Thomas L. Stevenson and Associates
666 Washington Rd., Suite #101
Pittsburgh, PA 15228

Attorney Stevenson would offer testimony about a powerful electrical surge, and information and/or misinformation that Duquesne Light provided regarding said surge, in the Markham neighborhood circa 2002.

2. Scott E. Hutchinson, Senator
Pennsylvania State Senate
170 Main Capitol

Harrisburg, PA 17120

As a member of the House in 2008, Senator Hutchinson would testify as to whether forced acceptance of a smart meter as a condition of electric service at 100% of residences in an EDC's service territory was the intent of Act 129 of 2008.

3. Kerry Benninghoff, Representative
Pennsylvania House of Representatives
147 Main Capitol
P.O. Box 202171
Harrisburg, PA 17120

As a member of the House in 2008, Representative Benninghoff would testify as to whether forced acceptance of a smart meter as a condition of electric service at 100% of residences in an EDC's service territory was the intent of Act 129 of 2008.

4. Stanley E. Saylor, Representative
Pennsylvania House of Representatives
245 Main Capitol Building
P.O. Box 202094
Harrisburg, PA 17120

As a member of the House in 2008, Representative Saylor would testify as to whether forced acceptance of a smart meter as a condition of electric service at 100% of residences in an EDC's service territory was the intent of Act 129 of 2008.

5. Robert Sturges Jr.
Professor Emeritus
Department of Industrial and Systems Engineering
College of Engineering
Virginia Tech
100 Durham Hall
Blacksburg, VA 24061

Dr. Sturges would testify as to whether the wiring of the 1938-vintage Property would be

compromised by installation of the Smart Meter.

6. Linda Kurtz, Director
Smart Meter Education Network
2150 Foss St.
Ann Arbor, MI 48103

Ms. Kurtz would offer testimony regarding adverse health effects from smart meter installations.

Respectfully submitted,

A handwritten signature in black ink that reads "Pamela Scott". The signature is written in a cursive style with a horizontal line underneath it.

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

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the foregoing Answer to Complainant's Petition to Reopen upon the participants listed below in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant):

Pamela Scott
134 Markham Drive
Pittsburgh, PA 15228

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

via mail and e-mail at:
jeffwatson@pa.gov
mwarnar@pa.gov

Dated this 13th day of December 2024.



Jeremy V. Farrell, Esquire