

May 26, 2026

VIA E-FILING

Matthew Homsher, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
P.O. Box 3265  
Harrisburg, PA 17105-3265

**Re: Lauren Zonca v. Metropolitan Edison Company Docket No. C-2023-3041619**

**REPLY TO ANSWER AND NEW MATTER OF MET-ED TO THE FIRST AMENDED  
FORMAL COMPLAINT OF LAUREN ZONCA**

Dear Secretary Homsher:

I am copying you on my filing of my Reply to Answer and New Matter of Met-Ed. I have served a copy of this letter on First Energy Service Company/Metropolitan Edison Company and ALJ Jeffrey Watson.

Sincerely,

A handwritten signature in black ink, appearing to be the name 'L Zonca' written in a cursive style.

Lauren Zonca

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITIES COMMISSION**

Lauren Zonca	:	
	:	
Complainant	:	C-2023-3041619
	:	
Vs	:	
	:	
METROPOLITAN EDISON COMPANY	:	
	:	
Respondent	:	
	:	

**REPLY TO ANSWER AND NEW MATTER OF METROPOLITAN EDISON COMPANY  
TO THE FIRST AMENDED FORMAL COMPLAINT OF  
LAUREN ZONCA**

Below I respond to Met-Ed’s Answers and New Matter.

Items 1 and 2, which Met-Ed admitted, are simple facts requiring no dispute.

Item 3-II-1. Oddly, Met-Ed seems to confuse Act 129 and the PUC’s Implementation Order. I referred to three excerpts from the Implementation Order, yet Met-Ed writes that “Act 129 speaks for itself.” I was speaking about the Implementation Order, not Act 129. I am not clear on what Mr. Meehan is denying here. I affirm what I wrote.

Item 3-III-2. Oddly, Met-Ed agrees that I did not request a smart meter, which accords with the PUC’s Implementation Order excerpts and Act 129 §2807(f)(2). However, Mr. Meehan concludes with a phrase used in other answers which follow – “this paragraph contains legal conclusions to which no response is required. The Company further avers that Act 129 speaks for itself.” Of course, I agree with this latter – Act 129 §2807(f)(2) speaks LOUDLY for itself, as did former PA Representative James Yewcic in his hearing before the PUC on his own Formal Complaint, and other legislators in the Senate and House Journals of that time. As to legal conclusions, is Met-Ed leaving such conclusions for the court to decide? That is, in any such future filings, such as in briefs and replies to briefs if I get to that stage, will Mr. Meehan not be citing case law or making legal arguments, but remain silent, deferring to the court? Just wondering.

Item 3-IV-3. By denying Met-Ed is not violating its own tariff, he reveals he is unable or unwilling to read what I quoted from the tariff: **Upon written request the Company will acquire, install, maintain and read qualified advanced metering and meter-related devices**. Theirs is plain English. Is Mr. Meehan denying plain English?

Item 3-IV-4. Again, Met-Ed uses that iconic phrase “Denied. This paragraph contains legal conclusions to which no response is required. The Company avers that Act 129 and the Company’s tariff speak for themselves.”

Item 3-V-5. Denial refuted, as my text speaks for itself

Item 3-V-6. Denial refuted, as my text speaks for itself.

Item 3-V-7. Denial refuted, as my text speaks for itself. Again, Met-Ed’s attorney reveals he is unable or unwilling to read PUC regulations and take in their meaning.

Item 3-V-8. Denial refuted, as my text speaks for itself. I predict that later on, Mr. Meehan will have a lot to say about 315(c).

Item 3-V-9. I have already received an answer to the implied question in my Interrogatories which affirms my claim that the burden of proof is on utilities. I quote from the Interrogatories here:

***INTERROGATORY SET I, E, NO. Q12:***

*Has Met Ed ever been penalized for providing unsafe or unreasonable service? If yes, please cite the date and a short summary of each case.*

***RESPONSE:***

*Yes. However, the Company does not track cases in which it was penalized for providing unsafe or unreasonable service and therefore cannot produce the requested information.*

Item 3-V-10. My text speaks for itself.

Item 4. When Mr. Meehan, speaking for the Company, “specifically denies that the Complainant is entitled to the relief requested,” he has been anything but specific, hiding behind the frequent use of a simple denial and claiming “This paragraph contains legal conclusions to which no response is required.”

Lacking any defense through hiding behind this phrase, Mr. Meehan, speaking for the Company, seems to have abrogated any claim to an oppositional argument. I therefore repeat my claim here:

*Incorporating all of the reasons above, I (Complainant) respectfully request that the Commission order the Metropolitan Edison Company to leave our electromechanical analog meter on my house and not replace it with an AMI meter (“smart meter”) or any other device that transmits or receives wireless signals or transmits conducted emissions via a switched mode power supply, for each and any of the reasons outlined above.*

**NEW MATTER**

Item 11. Ditto for me as Complainant.

Item 12. Denied. Povacz II was based on one set of facts. Were the facts different, the Court might have come to a different conclusion. In particular, the codes mentioned above were not considered, nor was the evidence attesting to intent of the Assembly as reported in the Senate and House Journals addressed in the written decision.

Items 13-23, These are collectively merely summaries of the legal cases and do not qualify as new matter. I repeat my response in Item 12 above as applicable here.

Item 24. Reviewing Met-Ed's Tariffs, available on the PUC website, I could not find information confirming Met-Ed's claim that "The Company's Commission-approved tariff does not allow customers, such as the Complainant, to opt-out of or rescind smart meter installation." Denied until shown otherwise.

Item 25. I deny that I am requesting an opt-out. I am merely requesting that Met-Ed follow the law and the codes incident on the law, as described in my Amended Formal Complaint. No accommodation is required here.

Item 26. Denied. This paragraph contains legal conclusions to which no response is required. Further, Mr. Meehan pretends to speak for the Commission by telling it what it cannot do.

For all the reasons listed in my Amended Formal Complaint, Met-Ed's Answer and New Matter has nothing to commend it for further review by this Court. Met-Ed's request to dismiss my Amended Formal Complaint with prejudice is without merit as demonstrated by my replies to the Company's denials above.

I respectfully request that the Commission order the Metropolitan Edison Company to leave the electromechanical analog meter on my house and not replace it with an AMI meter ("smart meter") or any other device that transmits or receives wireless signals or transmits conducted emissions via a switched mode power supply, for each and any of the reasons outlined in my Amended Formal Complaint, and further elaborated in this Reply.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read 'L Zonca', with a long horizontal flourish extending to the right.

Lauren Zonca

May 26, 2025

**Docket No. C-2023-3041619**

**CERTIFICATE OF SERVICE**

I hereby certify that true and correct copies of Complainant's REPLY TO ANSWER AND NEW MATTER OF METROPOLITAN EDISON COMPANY TO THE FIRST AMENDED FORMAL COMPLAINT OF LAUREN ZONCA have been served upon the following persons in the manner indicated, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant):

**VIA ELECTRONIC MAIL**

Administrative Law Judge  
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Counsel for FirstEnergy Pennsylvania  
Electric Company (Met-Ed Rate District)

Date: May 26, 2025



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