

ORDER TO COMPELL

BEFORE THE PUBLIC UTILITIES COMMISSION OF OHIO

FROM: GEORGE STEVENSON AND MEROP STEVE

AGAINST: OHIO EDISON – FIRST ENERGY CO

Case No 21-0247-EL-CSS

Sep 9, 2021

Memorandum:

Basis of Motion to Compel: Ohio Edison objected to our questions throughout the discovery process and most recently did not provide direct answers to our questions in our response to their Motion to Dismiss.

The below are the discovery questions that we requested Ohio Edison to provide direct answers in our response to their “Motion to Dismiss” . Our questions are directly relevant to our case which includes but not limited to safety of smart meters, justification of opt out charges, individual data privacy concerns, freedom of true choice, etc. Factual answers by Ohio Edison could also provide evidence which may NOT have been available to PUCO when Ohio Edison’s application was approved. Ohio Edison is objecting to our questions by using words like ‘burdensome’ not in their “... interest of administrative efficiency and economy.....” and that we should NOT question the “...Commission-approved rider” The questions below pertain to our and public safety when we and others are exposed to smart meter radiation either directly or cumulatively. We are asking to view the detailed calculations used to create the opt out fees as we and others are forced to pay Ohio Edison when opting out. We are questioning the limitation of “opt out options” to ‘take or pay’ tactics, which forces and alters the option to choose freely. We are questioning Ohio Edison’s criminal trespassing without any notification and no information on the product they proceeded to install in our home. We are questioning the use and distribution of private data collected by smart meters as it affects our privacy. We are questioning the validity of collecting, crediting/debating our money and labeling it as ‘cost to pay someone to read our meter’. For these and other reasons we respectfully request that the Commission enforces this motion to compel so we can receive answers directly supporting our case.

This motion to compel is seeking answers to the following discovery questions:

1. How many times in a 24-hour period, Ohio Edison obtains readings from a smart meter?
2. What is the radiation level that the smart meter omits during a transmission of a reading and is there any radiation omitted by smart meters when the meters are not transmitting data?
3. Provide documentation that Ohio Edison has obtained from a credible source that supports the radiation levels omitted by smart meters are within public safety levels to include any documentation from Ohio Edison or their credible source on effects of cumulative radiation levels that are more prominent in our contemporary lifestyles. This is important as the public has not choice in turning off a smart meter.
4. Who pays for the energy utilized by the smart meter during data transmission?

5. Is the data obtained by Ohio Edison smart meter reading used beyond calculating usage for the purpose of invoicing a customer? And furthermore, is the data obtained shared with anyone outside Ohio Edison?
6. Who monitors Ohio Edison's actions pertaining individual privacy of data?
7. Prior to smart meters, was the cost of reading a meter part of the overall cost of electricity? What was the cost of reading an analog meter prior to smart meters?
8. How is the \$28 opt out charge calculated? (full detail)
9. What is the credit applied to customers that no longer require a physical meter reading?
10. Why did Ohio Edison entered our property without prior notification and without any identification and proceeded to change the meter?
11. What is your motive of charging an opt out fee when clear and proven alternative options have been available within the PUCO system?
12. What are the benefits and risks of a smart meter to Ohio Edison and the customer?

Meropi Steve and George Stevenson

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PUCO Docketing Division

Emily Danford, Kristen Fling - Ohio Edison Attorneys

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Case No(s). 21-0247-EL-CSS

Summary: Motion Motion to Compel electronically filed by Mr. George Stevenson on behalf of Steve, Meropi Ms. and Mr. George Stevenson