

COMMONWEALTH OF PENNSYLVANIA



OFFICE OF CONSUMER ADVOCATE

555 Walnut Street, 5th Floor, Forum Place  
Harrisburg, Pennsylvania 17101-1923  
(717) 783-5048  
800-684-6560

FAX (717) 783-7152  
consumer@paoca.org

June 20, 2016

Tori L. Giesler, Esquire  
FirstEnergy Service Company  
2800 Pottsville Pike  
P.O. Box 16001  
Reading, PA 19612

RE: Pennsylvania Public Utility Commission v.  
Metropolitan Edison Company;  
Pennsylvania Electric Company;  
Pennsylvania Power Company;  
West Penn Power Company  
Docket Nos. R-2016-2537349  
R-2016-2537352  
R-2016-2537355  
R-2016-2537359

Dear Counsel:

Enclosed you will find two copies of Data Requests of the Office of Consumer Advocate, Set VII, in the above-referenced proceeding.

In accordance with the Commission's Rules of Practice and Procedure, we request that the Company provide verified answers to these inquiries within ten (10) days of service. Also, please forward the verified answers as they are completed, rather than waiting until the responses to the full set are completed. We would appreciate it if you would communicate any objections you may have to these data requests as soon as possible.

We also request that you send a copy of the answers directly to our consultant, as listed below:

Ralph Smith  
Larkin & Associates  
15728 Farmington Road  
Livonia, MI 48154  
E-Mail: rsmithla@aol.com

Tori L. Giesler, Esquire  
June 20, 2016  
Page 2

If you have any questions, please call us. By copy of this letter, copies of these data requests have been served upon all parties. A certificate of service showing service of these data requests on all parties has been filed with Secretary Chiavetta of the Pennsylvania Public Utility Commission as required by 52 Pa. Code §5.341(b).

Sincerely,

*Candis A. Tunilo*

\_\_\_\_\_  
Candis A. Tunilo  
Assistant Consumer Advocate  
PA Attorney I.D. # 89891

Enclosures

cc: PUC Secretary Chiavetta, (letter and Certificate of Service only)  
Certificate of Service

\*222728

CERTIFICATE OF SERVICE

Pennsylvania Public Utility Commission :  
v. :  
Metropolitan Edison Company; : Docket Nos. R-2016-2537349  
Pennsylvania Electric Company; : R-2016-2537352  
Pennsylvania Power Company; : R-2016-2537355  
West Penn Power Company : R-2016-2537359

I hereby certify that I have this day served a true copy of the foregoing document, the Office of Consumer Advocate's Interrogatories Requests for Production of Documents to Met-Ed, Penelec, Penn Power and West Penn (Collectively FirstEnergy) – Set VII, upon parties of record in this proceeding in accordance with the requirements of 52 Pa. Code §1.54 (relating to service by a participant), in the manner and upon the persons listed below:

Dated this 20<sup>th</sup> day of June 2016.

SERVICE BY E-MAIL & INTER-OFFICE MAIL

Allison C. Kaster, Esquire  
Gina L. Lauffer, Esquire  
Bureau of Investigation and Enforcement  
Pa. Public Utility Commission  
P.O. Box 3265  
Harrisburg, PA 17105

SERVICE BY E-MAIL & U.S. MAIL, POSTAGE PREPAID

Thomas P. Gadsden, Esquire  
Anthony DeCusatis, Esquire  
Catherine G. Vasudevan, Esquire  
Brooke E. McGlenn  
Morgan, Lewis & Bockius LLP  
1701 Market Street  
Philadelphia, PA 19103

Tori L. Giesler, Esquire  
First Energy Service Company  
2800 Pottsville Pike  
Reading, PA 19612

Daniel G. Asmus, Esquire  
Office of Small Business Advocate  
Suite 202, Commerce Building  
300 North Second Street  
Harrisburg, PA 17101

Charis Mincavage, Esquire  
Susan E. Bruce, Esquire  
Vasiliki Karandrikas, Esquire  
Kenneth Stark, Esquire  
Alessandra L. Hylander, Esquire  
McNees Wallace & Nurick LLC  
100 Pine Street  
P.O. Box 1166  
Harrisburg, PA 17108  
*Counsel for MEIUG, PICA, WPPII*

Derrick Price Williamson, Esquire  
Barry A. Naum, Esquire  
Spilman Thomas & Battle, PLLC  
1100 Bent Creek Boulevard, Suite 101  
Mechanicsburg, PA 17050  
*Counsel for Walmart*

Scott Rubin  
333 Oak Lane  
Bloomsburg, PA 17815  
*Counsel for IBEW – Local 459*

George W. Kerr  
Worthington Borough  
P.O. Box 66  
Worthington, PA 16262

Joline Price, Esquire  
Elizabeth R. Marx, Esquire  
Patrick M. Cicero, Esquire  
118 Locust Street  
Harrisburg, PA 17101  
*Counsel for CAUSE-PA*

George Jugovic, Jr., Esquire  
Citizens for Pennsylvania's Future  
200 First Avenue, Suite 200  
Pittsburgh, PA 15222  
[Altenburg@pennfuture.org](mailto:Altenburg@pennfuture.org) (email only)

SERVICE BY E-MAIL ONLY

Joseph O. Minott, Esquire  
Logan Welde, Esquire  
135 S. 19<sup>th</sup> Street  
Suite 300  
Philadelphia, PA 19103  
*Counsel for Clean Air Council*

*Candis A. Tunilo*

---

Darryl A. Lawrence  
Senior Assistant Consumer Advocate  
PA Attorney I.D. # 93682  
Email: [DLawrence@paoca.org](mailto:DLawrence@paoca.org)

Lauren M. Burge  
Assistant Consumer Advocate  
PA Attorney I.D. # 311570  
Email: [LBurge@paoca.org](mailto:LBurge@paoca.org)

David T. Evrard  
Assistant Consumer Advocate  
PA Attorney I.D. # 33870  
E-Mail: [DEvrard@paoca.org](mailto:DEvrard@paoca.org)

Candis A. Tunilo  
Assistant Consumer Advocate  
PA Attorney I.D. # 89891  
E-Mail: [CTunilo@paoca.org](mailto:CTunilo@paoca.org)

Counsel for  
Office of Consumer Advocate  
555 Walnut Street 5th Floor, Forum Place  
Harrisburg, PA 17101-1923  
Phone: (717) 783-5048  
Fax: (717) 783-7152  
222756