



COMMONWEALTH OF PENNSYLVANIA  
PENNSYLVANIA PUBLIC UTILITY COMMISSION  
P.O. BOX 3265, HARRISBURG, PA 17105-3265

IN REPLY PLEASE  
REFER TO OUR FILE

July 14, 2016

Thomas Gadsden, Esquire  
Morgan Lewis  
1701 Market Street  
Philadelphia, PA 19103-2921

Re: Pennsylvania Public Utility Commission v.  
Metropolitan Edison Company  
Docket No. R-2016-2537349

Dear Mr. Gadsden:

Enclosed please find two (2) copies of the Bureau of Investigation and Enforcement's (I&E) Interrogatory, **I&E-RE-31**. Please restate this Interrogatory before responding, and start this Interrogatory and response on a separate page. The responses should identify the responding person(s).

The response to this Interrogatory is due within ten (10) calendar days. Please provide two (2) copies of your responses and forward them to me at Post Office Box 3265, Harrisburg, PA 17105-3265.

If you have any questions, please contact me at (717) 783-7998.

Sincerely,

Allison C. Kaster  
Senior Prosecutor  
Bureau of Investigation and Enforcement  
PA Attorney I.D. #93176

Gina L. Lauffer  
Prosecutor  
Bureau of Investigation and Enforcement  
PA Attorney I.D. #313863

ACK/GLL/snc  
Enclosure

cc: Certificate of Service  
Secretary Chiavetta (Cover Letter and COS only)

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Pennsylvania Public Utility Commission :  
 :  
 v. : Docket No. R-2016-2537349  
 :  
 Metropolitan Edison Company :

**CERTIFICATE OF SERVICE**

I hereby certify that I am serving the foregoing **Interrogatory** dated July 14, 2016, in the manner and upon the persons listed below, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a party):

**Served via Electronic and First Class Mail**

Thomas P. Gadsden, Esquire  
Anthony C. DeCusatis, Esquire  
Catherine G. Vasudevan, Esquire  
Brooke E. McGlinn, Esquire  
Morgan Lewis & Bockius LLP  
1701 Market Street  
Philadelphia, PA 19103-2921

Darryl A. Lawrence, Esquire  
Lauren M. Burge, Esquire  
David T. Evrard, Esquire  
Candis A. Tunilo, Esquire  
Office of Consumer Advocate  
555 Walnut Street  
5th Floor Forum Place  
Harrisburg, PA 17101-1923

Joline Price, Esquire  
Elizabeth R. Marx, Esquire  
Patrick M. Cicero, Esquire  
Pennsylvania Utility Law Project  
118 Locust Street  
Harrisburg, PA 17101

Derrick Price Williamson, Esquire  
Barry A. Naum, Esquire  
Spilman Thomas & Battle, PLLC  
110 Bent Creek Boulevard, Suite 101  
Mechanicsburg, PA 17050

Mare Ellen McConnell  
2278 Ragged Mountain Road  
Clearville, PA 15535

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

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

Charis Mincavage, Esquire  
Vasiliki Karandrikas, Esquire  
Kenneth Stark, Esquire  
Alessandra L. Hylander, Esquire  
McNees Wallace & Nurick, LLC  
100 Pine Street  
P.O. Box 1166  
Harrisburg, PA 17108-1166

Thomas J. Sniscak, Esquire  
Christopher M. Arfaa, Esquire  
William E. Lehman, Esquire  
Hawke McKeon & Sniscak LLP  
100 North Tenth Street  
Harrisburg, PA 17101

John Finnigan, Esquire  
Environmental Defense Fund  
128 Winding Brook Lane  
Terrace Park, Ohio 45174

**Served via Electronic Mail**

George Jugovic, Jr.  
jugovic@pennfuture.org

Joseph Otis Minott, Esq.  
joe\_minott@cleanair.org

Andrew Herster  
[aherster@pa.gov](mailto:aherster@pa.gov)  
(testimony only)

Lee Yalcin  
[lyalcin@pa.gov](mailto:lyalcin@pa.gov)  
(testimony only)

Ernest Logan Welde  
[lwelde@pennfuture.org](mailto:lwelde@pennfuture.org)

Marc Hoffer  
[mhoffer@pa.gov](mailto:mhoffer@pa.gov)  
(testimony only)

Yasmin Snowberger  
[ysnowberge@pa.gov](mailto:ysnowberge@pa.gov)  
(testimony only)

---

Allison C. Kaster  
Senior Prosecutor  
Bureau of Investigation and Enforcement  
PA Attorney I.D. #93176

Gina L. Lauffer  
Prosecutor  
Bureau of Investigation and Enforcement  
PA Attorney I.D. #313863