

LUBIN & ENOCH, P.C.

PHOENIX | DENVER | EL PASO | SANTA FE | BEND

Stanley Lubin (1941-2022)

Nicholas J. Enoch
Also admitted in Colorado & Texas

Clara S. Bustamante
Also admitted in New Mexico & Texas

Morgan L. Bigelow
Also admitted in New Mexico

Margot Veranes
Also admitted in New Mexico & Texas

Taylor M. Secemski

Nicholas P. Granath *of Counsel*
Admitted in Oregon only

349 North Fourth Avenue
Phoenix, Arizona 85003
(602) 234-0008
Fax: (602) 626-3586

May 16, 2024

Via Electronic Email Only This Date To:

Tori L. Giesler, Esq.
Darshana Singh, Esq.
Angelina M. Umstead, Esq.
FirstEnergy Service Company
tgiesler@firstenergycorp.com
singhd@firstenergycorp.com
aumstead@firstenergycorp.com

**Re: Pa. PUC v. FirstEnergy Pennsylvania Company
Docket No. R-2024-3047068
Interrogatories of Local 777 of the IBEW
Our File No: 1577-002**

Dear Counsel:

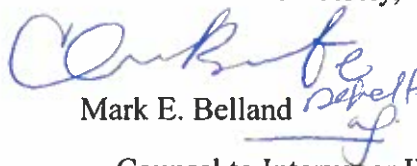
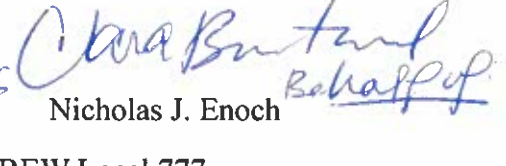
Enclosed you will find the Interrogatories of Local 777 of the International Brotherhood of Electrical Workers ("IBEW Local 777") in this matter.

In accordance with the Commission's Rules of Practice and Procedure, we request FirstEnergy Pennsylvania Company provide verified answers to these inquiries within fifteen (15) 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 requests as soon as possible.

If you have any questions, please call us. By copy of this letter, copies of these requests have been served upon all parties. A certificate of service showing service of these interrogatories 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,

 
Mark E. Belland *behalf of* Nicholas J. Enoch *Behalf of*

Counsel to Intervenor IBEW Local 777

Enclosures

cc: PUC Secretary Rosemary Chiavetta (Letter and Certificate of Service Only)
Certificate of Service

**PENNSYLVANIA PUBLIC UTILITY
COMMISSION**

Docket No. R-2024-3047068

v.

**FIRSTENERGY PENNSYLVANIA
COMPANY**

CERTIFICATE OF SERVICE

I hereby certify that I have this 16th day of May 2024 filed electronically on the Commission's electronic filing system and served, a true copy of the following document, INTERROGATORIES OF LOCAL 777 OF THE INTERNATIONAL BROTHERHOOD OF ELECTRICAL WORKERS, AFL-CIO, 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.

Via Email:

Tori L. Giesler, Esq.
Darshana Singh, Esq.
Angelina M. Umstead, Esq.
FirstEnergy Service Company
tgiesler@firstenergycorp.com
singhd@firstenergycorp.com
aumstead@firstenergycorp.com

David B. MacGregor, Esq.
Garrett P. Lent, Esq.
Nicholas A. Stobbe, Esq.
Devin T. Ryan, Esq.
dmacgregor@postschell.com
glent@postschell.com
nstobbe@postschell.com
dryan@postschell.com
Attorneys for FE PA

Scott B. Granger, Esq.
Attorney for Bureau of Investigation and Enforcement
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor West, PO Box 3265
Harrisburg, PA 17105-3265
sgranger@pa.gov

NazAarah Sabree, Small Business Advocate
ra-sba@pa.gov
Office of Small Business Advocate

Rebecca Lyttle, Esq.
Sharon E. Webb, Esq.
Assistant Small Business Advocate
555 Walnut Street, 1st Floor
Forum Place
Harrisburg, PA 17101
relyttle@pa.gov
swebb@pa.gov

Harrison W. Breitman, Esq.
Emily A. Farren, Esq.
Hbreitman@paoca.org
Efarren@paoca.org
Assistant Consumer Advocates

Ria M. Pereira, Esq.
Elizabeth R. Marx, Esq.
John W. Sweet, Esq.
Lauren N. Berman, Esq.
pulp@pautilitylawproject.org
Attorneys for Intervenor-Applicant CAUSE-PA

Brian T. Kadlubek, Esq.
Pullman Center
112 Hollywood Drive, Suite 101
Butler, PA 16001
btkadlubek@lawgol.com
Attorney for Intervenor-Applicant IBEW Local 459

Mark E. Belland, Esquire
O'Brien, Belland & Bushinsky, LLC
509 South Lenola Road, Building 6
Moorestown, NJ 08057
mbelland@obblaw.com
IBEW Local 777

Darryl Lawrence, Esquire
Harrison Breitman, Esquire
Andrew Zerby, Esquire
Emily Farren, Esquire
Office of Consumer Advocate
555 Walnut Street Forum Place, 5th Floor
Harrisburg, PA 17101-1923
dlawrence@paoca.org
hbreitman@paoca.org
azerby@paoca.org
efarren@paoca.org
OCAFirstEnergy2024@paoca.org

Charis Mincavage, Esquire
Susan Bruce, Esquire
Kenneth R. Stark
Harrison Ryan Block
McNees Wallace & Nurick, LLC
100 Pine Street, P.O. Box 1166
Harrisburg, PA 17108
cmincavage@mcneeslaw.com
sbruce@mcneeslaw.com
kstark@mcneeslaw.com
rblock@mcneeslaw.com
Counsel for Met-Ed Industrial Users Group,
Penelec Industrial Customer Alliance,
and West Penn Power Industrial Intervenors
(MEIUG/PICA/WPPIUG)

Whitney E. Snyder, Esquire
Thomas J. Sniscak, Esquire
Hawke McKeon & Sniscak, LLP
100 N. 10th Street
Harrisburg, PA 17101
wesnyder@hmslegal.com
tjsniscak@hmslegal.com
Counsel for PSU

Donald Ellenberger
206 Huch Farm Road
Mars PA, 16046
dmrjj724@gmail.com

Annete Martin
3350 White Church Road
Chambersburg PA, 17202
g15a20@yahoo.com

Derrick Price Williamson
Barry A. Naum
Steven W. Lee
SPILMAN THOMAS & BATTLE, PLLC
1100 Bent Creek Boulevard, Suite 101
Mechanicsburg, PA 17050
dwilliamson@spilmanlaw.com
bnaum@spilmanlaw.com
slee@spilmanlaw.com
Counsel for Walmart Inc.

Dated May 16, 2024

/s/ Cristina Gallardo-Sanidad