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September 8, 2010

Via Hand Delivery

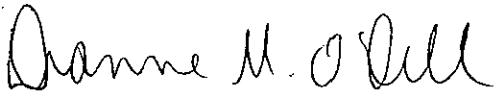
Rosemary Chiavetta, Secretary
PA Public Utility Commission
PO Box 3265
Harrisburg, PA 17105-3265

Re: Joint Application of West Penn Power Company d/b/a Allegheny Power, Trans-Allegheny Interstate Line Company and FirstEnergy Corp. for a Certificate of Public Convenience under Section 1102(a)(3) of the Public Utility Code approving a change of control of West Penn Power Company and Trans-Allegheny Interstate Line Company, Docket Nos. A-2010-2176520 and A-2010-2176732

Dear Secretary Chiavetta:

Enclosed for filing please find an original and three copies of the Retail Energy Supply Association's ("RESA") Objections to the Interrogatories (Set II) Of West Penn Power Company, Trans-Allegheny Interstate Line Company, And FirstEnergy Corp. Copies have been served in accordance with the attached Certificate of Service.

Very truly yours,



Deanne M. O'Dell, Esq.

DMO/lww
Enclosure

cc: Cert. of Service w/enc.

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**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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Joint Application of West Penn Power :
Company d/b/a Allegheny Power, Trans- :
Allegheny Interstate Line Company and : Docket No. A-2010-2176520
FirstEnergy Corp. for a Certificate of Public : Docket No. A-2010-2176732
Convenience under Section 1102(a)(3) of the :
Public Utility Code approving a change of :
control of West Penn Power Company And :
Trans-Allegheny Interstate Line Company :

**OBJECTIONS OF RETAIL ENERGY SUPPLY ASSOCIATION (“RESA”)
TO THE INTERROGATORIES (SET II) OF WEST PENN POWER COMPANY,
TRANS-ALLEGHENY INTERSTATE LINE COMPANY, AND FIRSTENERGY CORP**

Pursuant to 66 Pa. C.S. § 333(d) and 52 Pa. Code §§ 5.342(c) and (e), the Retail Energy Supply Association (“RESA”)¹ objects to Set II Interrogatory No. 2 propounded by West Penn Power Company, Trans-Allegheny Interstate Line Company, and FirstEnergy Corp. (collectively, “Joint Applicants”) as follows:

On September 3, 2010, the Joint Applicants served RESA with its Set II Interrogatory requests. RESA is preparing responses to all questions and plans to serve them on September 13, 2010. RESA, however, objects to question II-2 which states as follows:

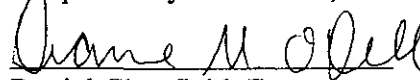
- Request JA (RESA)-II-2** For each EDC service territory in which RESA members do business, please provide, by service territory:
- a. The number of active electric or competitive generation suppliers (“EGSs”) in the service territory.
 - b. Whether the local utility is the provider of last resort, or if an alternative provider of last resort is in place.
 - c. The kilowatt demand threshold above which only hourly pricing provider of last resort service is available.

¹ RESA’s members include ConEdison *Solutions*; Constellation NewEnergy, Inc.; Direct Energy Services, LLC; Energy Plus Holdings, LLC; Exelon Energy Company; GDF SUEZ Energy Resources NA, Inc.; Gexa Energy; Green Mountain Energy Company; Hess Corporation; Integrys Energy Services, Inc.; Just Energy; Liberty Power; PPL EnergyPlus; Reliant Energy Northeast LLC; Sempra Energy Solutions LLC. The comments expressed in this filing represent the position of RESA as an organization but may not represent the views of any particular member of RESA.

- d. The percentage of spot market supply that is included in the provider of last resort's residential, commercial and industrial class offerings (either by direct purchases or through pricing of contracts with wholesale generation suppliers).
- e. The frequency of operational calls the utility or alternative provider of last resort has EGSs.
- f. The timing required for the utility to implement a new rate code upon request of an EGS.
- g. Whether the utility provides an Advance Notice of Drop transaction through electronic data interchange ("EDI").
- h. A description of the mechanism (if any) an EGS customer can remain an EGS customer when terminating service at one location and moving to another location within the utility's service territory.
- i. A description of the mechanism (if any) by which the local utility provides historical information on Unaccounted for Energy values to EGSs.

RESA objects to this question on the basis that it is not relevant to the subject matter involved in this proceeding nor is it reasonably calculated to lead to the discovery of admissible evidence. 52 Pa. Code § 5.321(c). RESA also objects on the basis that the question is overly broad and would cause unreasonable annoyance, embarrassment, oppression, burden or expense to RESA. 52 Pa. Code § 5.361(a)(2) and (4). Finally, RESA objects on the basis that this question seeks information that is not within the control or possession of RESA and would require RESA to undertake an unreasonable investigation of publicly available information. 52 Pa. Code § 5.361(a)(4). Subject to and without waiver of its objection, RESA will provide a response.

Respectfully submitted,



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Dated: September 8, 2010

CERTIFICATE OF SERVICE

I hereby certify that this day I served a copy RESA's Objections to Interrogatories of West Penn Power Company d/b/a Allegheny Power, Trans-Allegheny Interstate Line Company and FirstEnergy Corp., Set II, upon the persons listed below in the manner indicated in accordance with the requirements of 52 Pa. Code Section 1.54.

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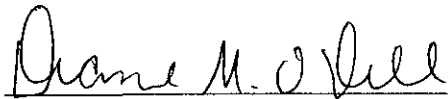
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Dated: September 8, 2010