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August 14, 2018

VIA E-FILING

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor
Harrisburg, PA 17120

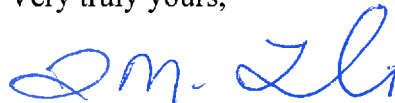
Re: Janine P. Wright v. West Penn Power Company
Docket No. C-2018-3003666

Dear Secretary Chiavetta:

Attached please find the Preliminary Objections of West Penn Power Company in the above-referenced matter. This document has been served on the Complainant as shown in the Certificate of Service.

Please contact me if you have any questions.

Very truly yours,



Lauren M. Lepkoski

krak
Enclosures

c: As per Certificate of Service

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

JANINE P. WRIGHT

v.

WEST PENN POWER COMPANY

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Docket No. C-2018-3003666

NOTICE TO PLEAD

TO: Janine P. Wright

Pursuant to 52 Pa. Code § 5.101 you are hereby notified that if you do not file a reply to the enclosed Preliminary Objections of West Penn Power Company within ten (10) days from service of this notice, the facts set forth by West Penn Power Company in the Preliminary Objections may be deemed to be admitted, thereby requiring no other proof. All pleadings, such as a Reply to Objection, must be filed with the Secretary of the Pennsylvania Public Utility Commission, with a copy service to counsel for West Penn Power Company, and where applicable, the Administrative Law Judge presiding over the case.

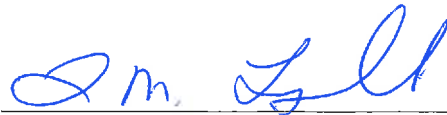
File with:

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
P.O. Box 3265
Harrisburg, PA 17105-3265

With a copy to:

Lauren M. Lepkoski
Tori L. Giesler
FirstEnergy Service Company
2800 Pottsville Pike
P.O. Box 16001
Reading, Pennsylvania 19612-6001

Date: August 14, 2018



Lauren M. Lepkoski, Esquire
Tori L. Giesler, Esquire

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

JANINE P. WRIGHT

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v.

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Docket No. C-2018-3003666

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WEST PENN POWER COMPANY

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**PRELIMINARY OBJECTION TO THE FORMAL COMPLAINT OF
JANINE P. WRIGHT**

TO THE PENNSYLVANIA PUBLIC UTILITY COMMISSION:

AND NOW, West Penn Power Company ("West Penn" or the "Company"), by and through its counsel, Lauren M. Lepkoski and Tori L. Giesler, files this Preliminary Objection pursuant to Section 5.101(a) of Pennsylvania Public Utility Commission ("Commission") regulations, 52 Pa. Code § 5.101(a)(1), and in support thereof, avers as follows:

I. Introduction

1. In her recently filed Formal Complaint, Janine P. Wright ("Complainant"), who resides at 1278 Blair Hill Road, Mount Pleasant, Pennsylvania 15666 ("Service Location") alleges that she does not want a smart meter installed at the Service Location. (Letters attached to Formal Complaint.)

2. The Company is in the process of deploying smart meters in its service territory in accordance with Act 129 of 2008 ("Act 129").¹

3. On October 3, 2017, the Company sent correspondence to the Complainant regarding the installation of a smart meter at the Service Location. On October 24, 2017, the Company received a letter from the Complainant which stated that she wished to "opt out" of the

¹ 66 Pa.C.S. § 2806.1 *et seq.* Among other things, Act 129 specifically directed that electric distribution companies with at least 100,000 customers file a smart meter technology procurement and installation plan with the Commission for approval. 66 Pa.C.S. § 2807(f)(1) and (2).

installation of a smart meter at the Service Location due to medical issues. On October 25, 2017, the Company contacted the Complainant to discuss her concerns regarding the smart meter installation. The Complainant reiterated her refusal of the installation of a smart meter at the Service Location. On November 1, 2017, the Company sent correspondence to the Complainant in an attempt to schedule installation of a smart meter at the Service Location. On November 2, 2017, Wellington Energy, a contractor for the Company, went to the Service Location to install a smart meter. The representative noted that the Complainant had installed a combination lock on meter and that no one was at the Service Location. Installation could not be completed by Wellington Energy.

On November 7, 2017, the Complainant filed an informal complaint with the Commission's Bureau of Consumer Services ("BCS") at Case No. 3575991 regarding the smart meter installation refusal. On January 8, 2018, the BCS dismissed the informal complaint stating that the BCS does not have jurisdiction over the service complaint and that three attempts to contact the Complainant went unanswered. On January 26, 2018, a Company representative went to the Service Location to install a smart meter but the meter pan was locked and the Company representative was unable to install the smart meter. On February 16, 2018, a Company representative went to the Service Location to install a smart meter but the meter pan was locked and the Company representative was again unable to install the smart meter. On February 21, 2018, the Company attempted to contact the Complainant to advise that the lock needs to be removed from the meter or the Complainant needs to provide the Company with the combination. The call went unanswered and there was no option to leave a voicemail. On April 5, 2018, the Company sent correspondence to the Complainant in an attempt to schedule installation of a smart meter at the Service Location.

On April 17, 2018, a pre-disconnection warning letter was issued to the Complainant pursuant to 66 Pa.C.S. § 1406, 52 Pa. Code § 56.81 and Rules 9 and 20 of the Company's Commission-approved tariff.² On April 27, 2018, a service termination notice was issued to the Complainant pursuant to 66 Pa.C.S. § 1406, 52 Pa. Code § 56.81 and Rules 9 and 20 of the Company's Commission-approved tariff.³ On May 4, 2018, the Company received a letter from the Complainant dated April 26, 2018 wherein the Complainant stated she wished to "opt out" of installation of a smart meter at the Service Location. On May 10 and May 11, 2018, the Company attempted to contact the Complainant to discuss the service termination notice. Both calls went unanswered and there was no option to leave a voicemail. On May 17, 2018, the Company posted a three-day service termination notice pursuant to 52 Pa. Code § 56.93. Later that day, the Complainant contacted the Company regarding the smart meter refusal. The Complainant stated that she owned the meter, does not want a smart meter installed and desired more time to find an alternative source of electricity. The Complainant requested a return call from a supervisor. That same day, a customer service supervisor contacted the Complainant. The Complainant alleged that the meter was installed at the Service Location by the prior owner and that no nameplate was placed on the meter identifying it as the property of the Company. The supervisor attempted to address the Complainant's concerns and to explain Act 129 and the mandate that a smart meter be installed at the Service Location. The supervisor provided the Complainant with the contact information for the Commission. The Complainant requested that the Company cease termination efforts until she files a complaint with the Commission. The supervisor advised that the Company cannot guarantee service would not be terminated until the

² 66 Pa.C.S. § 1406(a)(4); 52 Pa. Code § 56.81(3); *West Penn Power Company Retail Electric Service Tariff*, Electric Pa. PUC No. 52, pp. 40, 55, issued May 1, 2015, effective May 3, 2015.

³ *Id.*

Company is served by the Commission with a complaint. On May 29, 2018, a Company representative went to the Service Location to attempt to terminate service due to the Complainant's refusal to permit access to the meter to install a smart meter. The Company representative spoke with a male resident of the Service Location who refused installation of the smart meter. On June 11, 2018, a Company representative and supervisor went to the Service Location to terminate service to the Service Location due to the Complainant's refusal to permit access to the meter to install a smart meter. The meter services supervisor attempted to contact the Complainant by telephone prior to the field visit in an attempt to schedule installation of the smart meter. The calls went unanswered and there was no option to leave a voicemail. Further, upon arrival at the Service Location, personal contact was attempted by knocking on the front door several times in accordance with 52 Pa. Code § 56.94. No one answered the door and the Service Location appeared vacant. Service was lawfully terminated, and a post-termination notice was left in accordance with 52 Pa. Code § 56.96.

Later that day, the Complainant's son contacted the Company regarding the termination of service and stated that a complaint was pending at the Commission. The Company representative advised that the Company has not been notified by the Commission that a complaint had been filed and service would not be restored without a smart meter being installed. On June 12, 2018, the Complainant contacted the Company regarding the termination of service. She stated that she sent letters and filed complaints alleging the field workers who terminated service were rude and cursing. The Complainant again stated that she owned the meter and intends to install solar panels but cannot do so until power is restored. The Company representative issued an internal communication to the meter services supervisor advising of the Complainant's statements that the field workers were rude and cursing while terminating service. The Complainant then

requested to speak with a supervisor and was transferred. The Complainant reiterated her complaint to the call center supervisor who again advised that the Company has not been notified by the Commission that a complaint has been filed and service would not be restored without the installation of a smart meter. The Complainant indicated that she was not satisfied with the results of her telephone call and dispute rights were provided.

On July 24, 2018, the Complainant filed the Formal Complaint with the Commission. On July 26, 2018, the meter services technicians went to the Service Location due to suspicion possible meter tampering. The meter services technicians had found that the meter had advanced since service was terminated and removed the meter due to safety concerns and plated the meter socket. The meter services technicians spoke with a male resident of the Service Location at that time. On July 27, 2018, the Company was electronically served with the Formal Complaint.

4. As explained in greater detail below, even if all of the facts in the Formal Complaint are accepted as true, they do not constitute a violation of any law which the Commission has jurisdiction to administer, or of any regulation or order of the Commission, such that relief can be granted.⁴

5. As a result, the Company requests that this Preliminary Objection be granted and that the Commission: (1) strike the Complainant's request for an exemption from the installation of a smart meter; (2) dismiss the Formal Complaint in its entirety with prejudice; and (3) grant the Company such other relief as may be just and reasonable under the circumstances.

⁴ See 66 Pa.C.S. § 701.

II. Background

6. West Penn is an electric distribution company that is certificated as a public utility in Pennsylvania.

7. On October 3, 2017, the Company sent correspondence to the Complainant regarding the installation of a smart meter at the Service Location. On October 24, 2017, the Company received a letter from the Complainant which stated that she wished to “opt out” of the installation of a smart meter at the Service Location due to medical issues. On October 25, 2017, the Company contacted the Complainant to discuss her concerns regarding the smart meter installation. The Complainant reiterated her refusal of the installation of a smart meter at the Service Location. On November 1, 2017, the Company sent correspondence to the Complainant in an attempt to schedule installation of a smart meter at the Service Location. On November 2, 2017, Wellington Energy, a contractor for the Company, went to the Service Location to install a smart meter. The representative noted that the Complainant had installed a combination lock on meter and that no one was at the Service Location. Installation could not be completed by Wellington Energy.

On November 7, 2017, the Complainant filed an informal complaint with the Commission’s Bureau of Consumer Services (“BCS”) at Case No. 3575991 regarding the smart meter installation refusal. On January 8, 2018, the BCS dismissed the informal complaint stating that the BCS does not have jurisdiction over the service complaint and that three attempts to contact the Complainant went unanswered. On January 26, 2018, a Company representative went to the Service Location to install a smart meter but the meter pan was locked and the Company representative was unable to install the smart meter. On February 16, 2018, a Company representative went to the Service Location to install a smart meter but the meter pan was locked

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⁵ 66 Pa.C.S. § 1406(a)(4); 52 Pa. Code § 56.81(3); *West Penn Power Company Retail Electric Service Tariff*, Electric Pa. PUC No. 52, pp. 40, 55, issued May 1, 2015, effective May 3, 2015.

⁶ *Id.*

that no nameplate was placed on the meter identifying it as the property of the Company. The supervisor attempted to address the Complainant's concerns and to explain Act 129 and the mandate that a smart meter be installed at the Service Location. The supervisor provided the Complainant with the contact information for the Commission. The Complainant requested that the Company cease termination efforts until she files a complaint with the Commission. The supervisor advised that the Company cannot guarantee service would not be terminated until the Company is served by the Commission with a complaint. On May 29, 2018, a Company representative went to the Service Location to attempt to terminate service due to the Complainant's refusal to permit access to the meter to install a smart meter. The Company representative spoke with a male resident of the Service Location who refused installation of the smart meter. On June 11, 2018, a Company representative and supervisor went to the Service Location to terminate service to the Service Location due to the Complainant's refusal to permit access to the meter to install a smart meter. The meter services supervisor attempted to contact the Complainant by telephone prior to the field visit in an attempt to schedule installation of the smart meter. The calls went unanswered and there was no option to leave a voicemail. Further, upon arrival at the Service Location, personal contact was attempted by knocking on the front door several times in accordance with 52 Pa. Code § 56.94. No one answered the door and the Service Location appeared vacant. Service was lawfully terminated, and a post-termination notice was left in accordance with 52 Pa. Code § 56.96.

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12, 2018, the Complainant contacted the Company regarding the termination of service. She stated that she sent letters and filed complaints alleging the field workers who terminated service were rude and cursing. The Complainant again stated that she owned the meter and intends to install solar panels but cannot do so until power is restored. The Company representative issued an internal communication to the meter services supervisor advising of the Complainant's statements that the field workers were rude and cursing while terminating service. The Complainant then requested to speak with a supervisor and was transferred. The Complainant reiterated her complaint to the call center supervisor who again advised that the Company has not been notified by the Commission that a complaint has been filed and service would not be restored without the installation of a smart meter. The Complainant indicated that she was not satisfied with the results of her telephone call and dispute rights were provided.

On July 26, 2018, the meter services technicians went to the Service Location due to suspicion possible meter tampering. The meter services technicians had found that the meter had advanced since service was terminated and removed the meter due to safety concerns and plated the meter socket. The meter services technicians spoke with a male resident of the Service Location at that time.

8. On July 24, 2018, the Complainant filed the Formal Complaint with the Commission and, on July 27, 2018, the Company was electronically served with the Formal Complaint and termination efforts ceased.

9. West Penn is timely filing its Answer and New Matter contemporaneously with this Preliminary Objection, which Answer and New Matter is incorporated into this Preliminary Objection as if fully set forth herein.

III. Argument

10. The Commission's Rules of Practice and Procedure permit parties to file preliminary objections. The grounds for preliminary objections are limited to those set forth in 52 Pa. Code § 5.101(a) as follows:

- (1) Lack of Commission jurisdiction or improper service of the pleading initiating the proceeding.
- (2) Failure of a pleading to conform to this chapter or the inclusion of scandalous or impertinent matter.
- (3) Insufficient specificity of a pleading.
- (4) Legal insufficiency of a pleading.
- (5) Lack of capacity to sue, nonjoinder of a necessary party or misjoinder of a cause of action.
- (6) Pendency of a prior proceeding or agreement for alternative dispute resolution.
- (7) Standing of a party to participate in the proceeding.

11. The Commission's procedure regarding the disposition of preliminary objections is similar to that utilized in Pennsylvania civil practice.⁷

12. A preliminary objection in civil practice seeking dismissal of a pleading will be granted only where relief is clearly warranted and free from doubt.⁸ The Commission has adopted this standard.⁹

⁷ *Equitable Small Transportation Intervenors v. Equitable Gas Company*, Docket No. C-00935435 (Opinion and Order entered July 18, 1994).

⁸ *Interstate Traveler Services, Inc. v. Pa. Dept. of Environmental Resources*, 406 A.2d 1020 (Pa. 1979); *Rivera v. Philadelphia Theological Seminary of St. Charles Borromeo, Inc.*, 595 A.2d 172 (Pa. Super. 1991).

⁹ *Montague v. Philadelphia Electric Company*, 66 Pa. PUC 24 (1988).

13. In accordance with Section 701 of the Code¹⁰ a person may file a complaint which sets forth “any act or thing done or omitted to be done by any public utility in violation, or claimed violation, of any law which the commission has jurisdiction to administer, or of any regulation or order of the commission.” As explained below, the Company has not violated the Public Utility Code or the orders or regulations of the Commission.¹¹ In fact, the Company’s action have been in compliance with Act 129 and the June 5 Order.

14. The moving party may not rely on its own factual assertions but must accept for the purposes of disposition of the preliminary objection, all well-pleaded, material facts of the other party, as well as every inference fairly deducible from those facts.¹² Therefore, in ruling on a preliminary objection, the Commission must assume, for decisional purposes only, that the factual allegations of the Formal Complaint are true.¹³

15. West Penn’s smart meter deployment plan was approved by the Commission at Docket No. M-2013-2341991 by Order entered June 5, 2014. In accordance with the June 5 Order, the Company filed its final Smart Meter Deployment Plan (“SMP”) on June 16, 2014. The SMP was approved by the Commission on June 20, 2014. The Complainant challenges no aspect of the Company’s provision of electric service other than the installation of a smart meter at the Service Location, as required by Act 129 and the Company’s SMP.

¹⁰ 66 Pa.C.S. § 701

¹¹ *Id.*

¹² *County of Allegheny v. Commw. of Pa.*, 490 A.2d 402 (Pa. 1985).

¹³ *Id.*

16. Commission precedent is uniform that it cannot grant exceptions to the statutory directive that smart meters be installed by allowing customers to opt out.¹⁴

17. Assuming the facts pleaded in the Formal Complaint are true, as the Commission must for the purposes of ruling on a preliminary objection, the Complainant has failed to allege that West Penn has committed or omitted an act in violation of a Commission statute, regulation, order, or West Penn's tariff, a finding of which must be made in order to sustain a formal complaint.¹⁵

18. Because Act 129 and the Commission's orders not only authorize but require the Company to develop and implement a smart meter procurement and installation plan, and do not allow a customer to opt out of having a smart meter installed, this Complaint must be dismissed. As a matter of law, the Company is required to install a smart meter at the Service Location. As such, the Commission cannot find the Company to be in violation for having attempted to follow the law as it has done here.

19. Therefore, the Formal Complaint is legally insufficient because it fails to state a claim upon which the Commission can grant relief.¹⁶

¹⁴ *Negley v. Metropolitan Edison Company*, Docket No. C-2010-2205305 (Final Order entered March 3, 2011); *Lutherschmidt v. Metropolitan Edison Company*, Docket No. C-2010-2200353 (Final Order entered March 25, 2011). The Commission has continued to uphold installation of smart meters and imposition of smart meter charges on customers' bills by dismissing complaints opposing installation of smart meters and imposition of smart meter charges on the basis of legal insufficiency. *Corbett v. Pennsylvania Power Company*, Docket No. C-2011-2219898 (Final Order entered May 27, 2011); *Jones v. Metropolitan Edison Company*, Docket No. C-2011-2224380 (Final Order entered June 28, 2011); *Griffin v. Metropolitan Edison Company*, Docket No. C-2012-2300172 (Final Order entered July 31, 2012); *Brake v. West Penn Power Company*, Docket No. C-2013-2367308 (Opinion and Order entered November 14, 2013); *Drake v. Pennsylvania Electric Company*, Docket No. C-2014-2413771 (Final Order entered August 16, 2014); *Efaw v West Penn Power Company*, Docket No. C-2014-2413744 (Final Order entered August 16, 2014). See also, the Initial Decision of ALJ Susan D. Colwell in *Dennis McElwain v. Pennsylvania Power Company*, Docket No. C-2014-2451478 issued December 16, 2015.

¹⁵ See 66 Pa.C.S. § 701; *County of Allegheny*, supra. (Compl. ¶ 4.)

¹⁶ See 52 Pa. Code § 5.101(a)(4).

20. The Commission may dismiss a complaint without hearing if a hearing is not necessary in the public interest.¹⁷

21. Recently, the Commission set for hearing two cases in which the complainant was opposed to the installation of a smart meter at their premises.¹⁸ These cases represent a departure from past Commission practice of dismissing such complaints on Preliminary Objections. The Commission stated that where a complainant has presented specific factual averments regarding the health or other effects that they have experienced after a smart meter was installed at their home, the Commission has overruled Preliminary Objections and allowed a case to proceed. Specifically, in *Kreider*, the complainant alleged specific deleterious health effects after installation of a smart meter affecting her specific medical condition. Further, in *Van Schoyck*, the complainants alleged potential health risks due to constant ringing noise in their home and their inability to sleep since the time the smart meter was installed.¹⁹ In contrast, in the instant case, the Complainant has made no specific factual averments regarding any health effects *after* installation of a smart meter. Specifically, the Complainant simply states generically that she does not want a smart meter installed at the Service Location and avers that she owns the meter. The Commission is unable to grant the Complainant an “exemption” from Act 129. The Commission has not recognized a customer’s lack of consent to install a smart meter as sufficient to overcome Preliminary Objections.²⁰

¹⁷ 66 Pa.C.S. § 703(b); 52 Pa. Code § 5.21 (d).

¹⁸ *Susan Kreider v. PECO Energy Company*, Docket No. C-2015-2469655 (Order on Reconsideration entered January 28, 2016); *Stephen and Diane Van Schoyck v. PECO Energy Company*, Docket No. C-2015-2478239 (Opinion and Order entered February 25, 2016).

¹⁹ *Id.*

²⁰ *Richard and Marie Fugo in care of Fugo Eye Institute v. PECO Energy Company*, Docket Nos. C-2015-2519763 and C-2015-2519770 (Order entered April 6, 2016).

22. In *Charles F. Jackson v. Pennsylvania Electric Company*, Docket No. C-2017-2600495 (Order Entered August 31, 2017), the Commission approved the Initial Decision of ALJ David A. Salapa, dated June 26, 2017, which granted the Preliminary Objections of Pennsylvania Electric Company and dismissed the formal complaint of Mr. Jackson (who was disputing the installation of a smart meter) finding that formal complaint was legally insufficient, pursuant to 52 Pa. Code § 5.101(a)(4), in that the complaint fails to allege that the utility violated the Public Utility Code, Commission regulations or orders or its tariff provisions. The respondent was found to be authorized to install smart meters and impose a charge on its customers to develop and implement a smart meter procurement and installation plan that will lead to the installation of smart meters throughout its service territory. ALJ Salapa further found that the respondent was authorized to terminate the Mr. Jackson's service if he refused to provide the respondent with access to its meter and equipment to install the smart meter.

This Commission decision was entered after *Kreider*. The instant formal complaint is similar to the alleged averments in the formal complaint at Docket No. C-2017-2600495, in that the Complainant has only alleged that she does not want a smart meter at the Service Location. The Complainant has not set forth in her complaint that any act done by the Company violates a Commission regulation, statute or order.

23. Therefore, the Company respectfully submits that the matters plead in the subject Formal Complaint do not meet the standards set in *Kreider* and *Van Schoyck* such that this matter can survive dismissal on preliminary objections.

24. Further, the Commission has upheld decisions granting preliminary objections and dismissing complaints for legal insufficiency opposing smart meter installation. In *Negley*, ALJ Susan D. Colwell dismissed a complaint opposing installation of smart meters for legal insufficiency. ALJ Colwell concluded that Act 129 of 2008 authorized the installation of smart meters by EDCs. ALJ Colwell held that the Commission's orders approving the EDC's smart meter plans did not exempt any customers from the smart meter plans. By Commission final order entered March 3, 2011, ALJ Colwell's Initial Decision became final without further Commission action.

25. Rule 9 of the Company's Commission-approved tariff,²¹ allows the Company to have access to its customers' premises for any and all purposes relating to the supply of electric energy which includes the exchange of meters. The Complainant's refusal to allow the Company access to its own meter is a violation of Rules 9 and 20 of the Company's Commission-approved tariff²² and is grounds for termination of service. The Commission has also upheld decisions finding that a utility has the ability to terminate the service of a customer who refuses installation of a smart meter.²³

26. Because Act 129 of 2008 and the Commission's orders authorize the Company to develop and implement a smart meter procurement and installation plan, the Complainant has not set forth in her complaint any act done by the Company that violates a Commission regulation, statute or order.

²¹ *West Penn Power Company Retail Electric Service Tariff*, Electric Pa. PUC No. 52, p. 40 issued May 1, 2015, effective May 3, 2015.

²² *West Penn Power Company Retail Electric Service Tariff*, Electric Pa. PUC No. 52, pp. 40, 55, issued May 1, 2015, effective May 3, 2015.

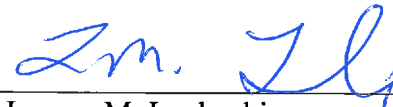
²³ *Art Larson v. PECO Energy Company*; Docket No. C-2014-2451754 (Opinion and Order entered June 11, 2015). See also, *Catherine J. Frompovitch v. PECO Energy Company*; Docket No. C-2015-2474602 (Opinion and Order entered May 3, 2018).

IV. Conclusion

WHEREFORE, for the foregoing reasons, West Penn Power Company respectfully requests that the Commission: (1) strike the Complainant's request for an exemption from the installation of a smart meter; (2) dismiss the Formal Complaint in its entirety with prejudice; and (3) grant the Company such other relief as may be just and reasonable under the circumstances.

Respectfully submitted,

Dated: August 14, 2018



Lauren M. Lepkoski
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Attorney No. 207742
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Counsel for West Penn Power Company

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

JANINE P. WRIGHT

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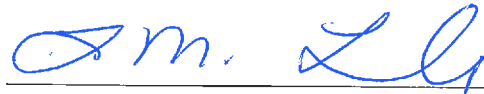
CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the Preliminary Objections of West Penn Power Company to the Formal Complaint of Janine P. Wright upon the individuals listed below, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

Service by First Class Mail, postage prepaid, as follows:

Janine P. Wright
P.O. Box 227
Luxor, Pennsylvania 15662

Dated: August 16, 2018



Lauren M. Lepkoski
Tori L. Giesler
FirstEnergy Service Company
2800 Pottsville Pike
P.O. Box 16001
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