

10 Oct 21

MEMORANDUM FOR PA Public Utility Commission  
ATTN: Ms. Rosemary Chiavetta, Esquire  
PO BOX 3265  
Harrisburg, Pa 17105-5265

FROM: Michael R. Florio  
1965 Sand Hill Rd  
Hershey, Pa 17033

Subject: Notice to Plead Docket No. C-2021-3028286

Encl: Notice to Plead (Docket No. C-2021-3028286 Michael R. Florio v Metropolitan Edison Company)

Dear Secretary Chiavetta,

This document is my response to an email I received from Ms. Margarett Morris regarding my claim against First Energy and Metropolitan Edison Company on 21 Sep 21. Ms. Morris stated she represented Metropolitan Edison Company and that I had 20 days to respond.

I found Ms. Morris response inadequate and misleading. It's also worth noting that Ms. Morris did not sign the "Certificate of Service" or Notice to Plead". From talking with my neighbors, I learned that Mr. Ray Lilliston went around the neighborhood telling them of the power line project. Mr. Lilliston gave people his card and contact information, which clearly stated he worked for AFS representing First Energy. Interestingly, Mr. Lilliston did not make contact with myself, the sole owner of the house on 1965 Sand Hill Rd, to explain how First Energy planned on entering my property or returning my property to original condition. An easement does not equate to a license to destroy the owner's property and it is common practice for restitution or repair of damage.

As for the where the complaint should be addressed to, I have no issue with my service provider (PPL) at this time and only the power transmission lines which are not owned by PPL. Ms. Morris denied in response to #2 that "Met-Ed" or First Energy is the appropriate Respondent with regard to this Complaint." Later in responding to #4, Ms. Morris stated only that Met-Ed is not the owner of transmission line and that the owner of line is Mid-Atlantic Interstate Transmission (MAIT). Ms. Morris failed to mention that MAIT is organized under Delaware Law, and is a subsidiary of First Energy Transmission, a direct subsidiary of First Energy. Following receipt of necessary regulatory approvals, on January 31, 2017, MAIT issued membership interests to FET, Pa Electric Company (PN) and Madison Edison Company in exchange for their respective cash and transmission asset contributions. MAIT owns and operates all of FERC-jurisdictional transmission assets previously owned by Met-Ed and PN. Since Ms. Morris could not adequately state the facts in this case, I request my complaint be amended to include First Energy, First Energy Transmission, Pa Electric Company, MAIT, and Met-Ed.

Lastly, Ms. Morris failed to respond to any of the substantial material in her response. The powerlines remain unsightly and affect property value and have major safety issues; there is a reason why companies are moving to place lines underground through out the country. Not only is there an electric-magnetic field, there is the constant risk of a pole or power line coming down and damaging property or causing casualties, especially during storms. Placing power lines underground also helps to

assure power to the neighborhood. It's worth noting that most people in this region of town is on well water so we are without water when power goes down. Economically it makes more sense to place the lines underground as there will be less long-term maintenance, less outages and better overall safety.

I look forward to the above concerns, shared by my family and neighbors, being properly addressed. I can be reached at (717) 460-5783 for any questions regarding this matter.

Sincerely

A handwritten signature in black ink that reads "Michael R. Florio". The signature is written in a cursive style with a large initial 'M' and a distinct 'F'.

Michael R. Florio

Copy to: Roger, Rizzo & Darnall  
ATTN: Ms. Morris

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

MICHAEL R. FLORIO

v.

Docket No. C-2021-3028286

METROPOLITAN EDISON COMPANY

**NOTICE TO PLEAD**

Pursuant to 52 Pa. Code § 5.63, I am hereby providing a written response answering the enclosed New Matter of Reger Rizzo & Darnall LLP within (20) days of their notice - dated 21 Sep 21. I further attest that that this reply is being filed with the Secretary of the Pennsylvania Public Utility Commission, with a copy served to counsel, Reger Rizzo & Darnall LLP (Margaret A. Morris, Esq.)

**File with:**

Rosemary Chiavetta, Esquire  
Secretary  
Pennsylvania Public Utility Commission  
[rchiavetta@pa.gov](mailto:rchiavetta@pa.gov)

**With a copy to:**

Margaret A. Morris, Esquire  
Reger Rizzo & Darnall LLP  
[mmorris@regerlaw.com](mailto:mmorris@regerlaw.com)

Date: 6 Oct 21



Michael R. Florio