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SECRETARY'S BUREAU

October 14, 2021

Ms. Margaret A. Morris, Esquire
Reger, Rizzo, Darnall LLP
Cira Centre, 13th Floor
2929 Arch Street
Philadelphia, PA 19104
mmorris@regerlaw.com

RE: Docket No. C-2021-3028464

Tracy and Jill Troutman v. Metropolitan Edison Company

Response to the New Matter provided by Reger, Rizzo, Darnall LLP (Respondent) – Dated October 4, 2021

Dear Ms. Morris,

Provided here is our Response to the Answer and New Matter filed by you based on the electronic letter we received from you (Reger, Rizzo, Darnall LLP) dated October 4, 2021.

A copy has also been sent to:

Ms. Rosemary Chiavetta, Esquire
Secretary
Pennsylvania Public Utility Commission
P.O. Box 3265
Harrisburg, PA 17105-3265
rchiavetta@pa.gov

Respectfully Submitted,



Tracy and Jill Troutman
160 Hawthorne Drive
Hershey, PA 17033
troutmantracy@outlook.com

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October 14, 2021

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

TRACY AND JILL TROUTMAN

V.

METROPOLITAN EDISON
COMPANY

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Docket No. C-2021-3028464

NOTICE TO PLEAD

Attached is our written Response to the "Answer and New Matter of Metropolitan Edison Company to the Complaint of Tracy and Jill Troutman" by Reger Rizzo & Darnall LLP.

Filed with the following:

Rosemary Chiavetta, Esquire
Secretary
Pennsylvania Public Utility Commission
P.O. Box 3265
Harrisburg, PA 17105-3265
rchiavetta@pa.gov

Margaret A. Morris, Esquire
Reger, Rizzo, Darnall LLP
Cira Centre, 13th Floor
2929 Arch Street
Philadelphia, PA 19104
mmorris@regerlaw.com

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

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TRACY AND JILL TROUTMAN

v.

METROPOLITAN EDISON
COMPANY

Docket No. C-2021-3028297

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**RESPONSE BY COMPLAINANTS (TRACY AND JILL TROUTMAN) IN RESPONSE TO THE ANSWER AND
NEW MATTER PROVIDED BY REGER, RIZZO, & DARNALL LLP (MARGARET A. MORRIS) REPRESENTING
METROPOLITAN ENERGY**

1. Noted

2. **Response** – Based on the response provided by Margret A. Morris, Esquire (denying Met-Ed responsibility and claiming ‘Met-Ed transferred ownership to MAIT’), and based on the public information provided below, it is our belief that Mid-Atlantic Interstate Transmission, LLC (MAIT) should be added to this complaint.

From Mid-Atlantic Interstate Transmission, LLC – “Audit Financial Statements – For the Years Ended December 31, 2020 and 2019”

MAIT, which is organized under Delaware law, is a subsidiary of FET, a direct subsidiary of FE. Following receipt of necessary regulatory approvals, on January 31, 2017, MAIT issued membership interests to FET, PN and ME in exchange for their respective cash and transmission asset contributions. MAIT owns and operates all of the FERC-jurisdictional transmission assets previously owned by ME and PN, consisting of approximately 4,260 circuit miles of transmission lines with nominal voltages of 500 kV, 345 kV, 230 kV, 138 kV, 115 kV, 69 kV and 46 kV in the PJM Region.

Based on the above, multiple entities seem to have an interest in Mid-Atlantic Interstate Transmission, LLC (MAIT) and therefore should be properly identified and represented on the complaint:

FE FirstEnergy Corp., a public utility holding company
FET FirstEnergy Transmission, LLC, formerly known as Allegheny Energy Transmission, LLC, which is the parent of ATSI, KATCo, MAIT and TrAIL and has a joint venture in PATH
PN Pennsylvania Electric Company, a Pennsylvania electric utility operating subsidiary
MAIT Mid-Atlantic Interstate Transmission, LLC
ME Metropolitan Edison Company, a Pennsylvania electric utility operating subsidiary

3. **Response**– We (the Complainants) are not customers of Met-Ed. However, we, as well as other property owners in the neighborhood (“The Meadows”) are either directly or indirectly impacted by the proposed powerline replacement.

4. Response –Respondent is correct that the poles and transmission lines do not directly cross our property. However, we are still directly and indirectly impacted by the poles and over ground transmission lines and assert that they should be placed underground through our neighborhood.

- When the above ground poles/wires were initially placed (per Ms. Morris' statement, the construction was "1963/1964"), they were placed in empty fields. However since circa 1996, those empty fields are now filled with homes - an established neighborhood (called "The Meadows") where we live. This neighborhood has large unsightly poles and wires going right through properties. The lines go right over yards where children play, which poses a potential safety hazard that can be eliminated with underground placement of the lines.
- Above ground poles/wires may pose health and safety risks to the residents of our neighborhood (e.g. carcinogenic). Scientific evidence that we've seen to date has not definitively proven that above ground utility lines have no safety and health risks.
- Above ground poles and wires are not aesthetically pleasing to look at, and negatively affect the property values in our neighborhood. We are aware of properties for sale in our neighborhood being turned down due to concerns about the poles/lines in the back yard.
- There is already a precedent in Hershey for placing the utility lines underground. A number of streets and neighborhoods in the town have had lines replaced underground. Given this, we believe the lines in our neighborhood should be placed underground as well.
- Above ground poles and lines are much more susceptible to wind and weather damage, impacting service to customers.

5. Response – We are not certain why Ms. Rizzo, representing Metropolitan Energy is responding to this complaint if, as they claim, Met-Ed is not the proper defendant. Further since they claim to deny responsibility, they would not be in a position of responsibility to state that they "deny that Complainants are entitled to the relief requested". Given the Corporate structure information we point out above, we believe there are likely multiple entities involved, including MAIT. While we are not in a position to determine who the appropriate defendants are in this case (if not Met-Ed), we request that the principle issues of our complaint be acknowledged and acted upon by the PUC and that the appropriate parties be identified as defendants.

6. Noted

7a. Noted

7b. Noted

7c. Noted

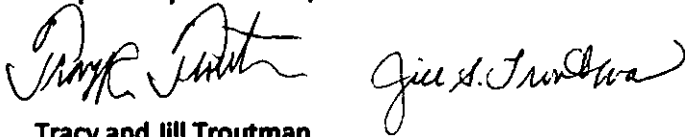
8. Noted

9. Noted

10. Noted

11. Response – As outlined in our Response #2 above, based on the response provided by Margret A. Morris, Esquire (denying Met-Ed responsibility), and based on the public information provided above, it is our belief that Mid-Atlantic Interstate Transmission, LLC (MAIT) should also be added to this complaint. However, it is our request that the appropriate parties that have an interest in this complaint be identified and added to this complaint.

Respectfully submitted,

Handwritten signatures of Tracy and Jill Troutman. The signature on the left is Tracy's, and the one on the right is Jill's.

Tracy and Jill Troutman
160 Hawthorne Drive
Hershey, PA 17033
troutmantracy@outlook.com

October 14, 2021

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RE: Docket No. C-2021-3028464
Tracy and Jill Troutman v. Metropolitan Edison Company
Response to the New Matter provided by Reger, Rizzo, Darnall LLP (Respondent) – Dated October 4, 2021


Dear Secretary Chiavetta:

Attached for filing is the Response of Tracy and Jill Troutman (Complainant) to the Answer and New Matter Response provided by Reger, Rizzo, Darnall LLP (Respondent) dated October 4, 2021 in the above referenced proceeding regarding the replacement of utility poles in our neighborhood ("The Meadows" in Hershey, PA).

A copy of the enclosed Response has also been forwarded to the party below - the Respondent in the matter indicated.

Ms. Margaret A. Morris, Esquire
Reger, Rizzo, Darnall LLP
Cira Centre, 13th Floor
2929 Arch Street
Philadelphia, PA 19104

Respectfully Submitted,



Tracy and Jill Troutman
160 Hawthorne Drive
Hershey, PA 17033
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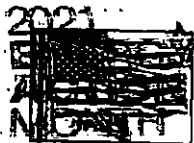


Tracy Troutman
160 Hawthorne Dr.
Hershey, PA 17033



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FOREVER / USA

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

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