

January 22, 2022

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

Re: Docket No. C-2021-3028211
Michael L. & Margaret G. Marino v. Metropolitan Edison Company
Answer to Motion for Judgement on the Pleadings of Metropolitan Edison Company

Dear Secretary Chiavetta:

In response to the Motion of Metropolitan Edison Company for Judgement on the Pleadings received from Margaret A. Morris, Esq. on January 7, 2022, we are submitting an acknowledgement of its receipt and our intention to continue to pursue this matter. Please see our responses to Metropolitan Edison Company (Met-Ed) listed below:

Procedural Background

1. We agree that we filed a formal complaint on August 26, 2021. We listed FirstEnergy/Met-Ed as Respondent in the case created by Michael and Margaret Marino v. Metropolitan Edison Company (Met-Ed). We are disputing the decision to replace overhead transmission facilities for the 72 (Campbelltown-Middletown-North Hershey) 69kV Transmission Line (Transmission Line). We agree we are not customers of Met-Ed; we are customers of PPL Electric Utilities, Inc.
2. On January 7, 2022 we were notified by Margaret A. Morris, Esquire from Reger Rizzo & Darnell LLP, arguing that the Transmission Line is owned exclusively by Mid-Atlantic Interstate Transmission, LLC (MAIT) and that our complaint is filed against the wrong party. However, on September 1, 2021, we received a letter from FirstEnergy's Regional External Affairs Consultant (FirstEnergy Service Company on behalf of Metropolitan Edison Company) stating that "FirstEnergy is rebuilding an existing 69-kilovolt transmission line to strengthen the electric system in Derry Township and surrounding areas". Additionally, Met-Ed, a FirstEnergy subsidiary, is performing work on the transmission facilities on the open properties adjacent to the Meadows neighborhood.

3. We agree, we did not reply previously to the assertion that Mid-Atlantic Interstate Transmission, LLC (MAIT) is the exclusive owner of the Transmission Line. Although the January 7, 2022 correspondence, from Margaret A. Morris, stated the Transmission Line is owned exclusively by MAIT, the FirstEnergy Annual Report 2021 Form 10-K (NYSE: FE) published on February 18, 2021, identifies MAIT and Met-Ed as subsidiaries of FirstEnergy. Therefore, we are amending our complaint to include MAIT as well as FirstEnergy/Met-Ed.
4. We agree, our formal complaint to the Pennsylvania Utility Commission (PUC) Listed FirstEnergy/Met-Ed. We are going to amend our complaint to include MAIT, FirstEnergy/Met-Ed.
5. We agree. Our call-in Initial Prehearing Conference was held on January 20, 2022. During the meeting we decided to amend our complaint. We agreed to file an amended complaint and to file our answer to the motion.

Legal Standard

6. As stands
7. As stands.
8. As stands.
9. As stands.
10. As stands.
11. As stands.
12. As stands.
13. We are still not fully convinced that MAIT is the sole owner of The Transmission Facilities since MAIT and Met-ED are subsidiaries of FirstEnergy and Met-Ed is performing the work on the Transmission Facilities in the undeveloped properties adjacent to the Meadows neighborhood.
14. We disagree. We believe FirstEnergy/Med-ED and MAIT are all involved and share responsibility for the rebuilding of the 69-kilovolt transmission line project between Sand Hill and Nye Roads.

Conclusion

We believe FirstEnergy/Med-ED and MAIT are all involved and share responsibility for the rebuilding of the 69-kilovolt transmission line project between Sand Hill and Nye Roads. We request that this case:

Not be dismissed

Be amended to include MAIT, FirstEnergy/Met-Ed

Proceed to the next steps

Respectfully,

Michael L. and Margaret G. Marino

Meadows Development Homeowners

Cc:

The Hon. Mark A. Hoyer, PA Public Utility Commission

The Hon. John Coogan, PA Public Utility Commission

Tori Giesler, Esquire, First Energy Service Company

Margaret A. Morris, Esquire

