

January 24, 2022

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

Re: Docket No. C-2021-3028302  
Pingqi Dai 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. dated on January 6, 2022, I am submitting my acknowledgment of its receipt and my intention to continue to pursue this matter. Please see my responses to Met-Ed as listed below:

#### **PROCEDURAL BACKGROUND**

1. Agree that I filed a formal PUC complaint. This was filed 8/30/2021  
I, however, listed FirstEnergy/Met Ed as Respondent and the case created was Pingqi Dai v. Metropolitan Edison Company. I agree I am disputing the decision to replace overhead transmission facilities running through the middle of our neighborhood.
2. I agree as per Ms. Morris said that MAIT has ownership of the transmission lines; however, the letter received in our development from FirstEnergy letterhead and signed by the Regional External Affairs Consultant FirstEnergy Company on behalf of Metropolitan Edison Company is somewhat contrary.
3. Agree, as per Ms. Morris said, MAIT has ownership of the transmission lines; however, referring to notation above (number 2), it appears Met Ed is a part of this ownership and also part of the plan or process of replacement of transmission lines.
4. Agree. I will be requesting MAIT to be added and may need to request FirstEnergy be added even though I had already included them in my initial complaint. They just were never assigned as a respondent.
5. Agree. And this call-in telephonic evidentiary hearing was held. The result is I will be amending my complaint and submitting this response. Also, I was granted to respond to this plead by January 28, 2022.

#### **LEGAL STANDARD**

6. As stands

7. As stands
8. As stands
9. As stands
10. As stands
11. As stands
12. As stands
13. Agree Met-Ed appears to not be the owner as per documents provided to me from Ms. Morris; HOWEVER, as per the letters sent from FirstEnergy on 7/29/2021 and 8/30/2021 to each member of our neighborhood; emails I have received from third party (Sr Right of Way agent from AFS orchestrating the replacement project) indicating FirstEnergy/Met Ed is the driving force of this project, and 2 letters sent to neighbors indicating Met Ed is the owner of these lines/poles, I cannot agree with confidence that Met-Ed is not part of this “ownership” or connected with this decision for replacement.
14. Agree it appears MAIT is the legal owner; however, I am not confident there is not a connection to Met Ed regarding the transmission line replacement in our neighborhood. Met Ed has been indicated in too many pieces of correspondence relating to the replacement of the transmission lines/poles in our development.

### **CONCLUSION**

There is no dispute that MAIT owns the transmission line; however, it is not clear that Met Ed is not still part of the ownership or decision making for the replacement of this transmission line/poles. The hearing scheduled for January 14, 2022, was converted to a pre-hearing conference, and was held as scheduled. I request this case is not dismissed and am prepared to present my case.

Respectfully submitted,

Pingqi Dai

Cc:

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

The Hon. John Coogan, PA Public Utility Commission

Tori Giesler, Esquire, FirstEnergy Service Company

Margaret A. Morris, Esquire