

27 Jan 22

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

Subj: Florio Response to 7 Jan 22 Motion and Formal Request to Amend Formal Complaint Docket
No. C-2021-3028286

Ref: Mike Florio Notice to Plead Docket No. C-2021-3028286 dated 11 Oct 21

Encl: (1) Documentation from First Energy and Metropolitan Edison Company to Residents

Dear Secretary Chiavetta,

This document serves as a response to First Energy and Metropolitan Edison Company Motion for Judgment on the Pleadings, dated 7 Jan 22, and to formally request my complaint be amended to include First Energy, First Energy Transmission, Pa Electric Company, Mid-Atlantic Interstate Transmission (MAIT), and Met-Ed as I requested in my October 2021 letter.

While I look forward, along with many of my neighbors, to discuss why these power transmission lines need to be placed underground, the intent of this letter is to ensure the right people are brought into the negotiations. First Energy/Met-Ed contend that they do not own the transmission lines and that they are now the responsibility of MAIT. First Energy/Met-Ed fails to mention that MAIT is organized under Delaware Law, and is a subsidiary of First Energy Transmission, a direct subsidiary of First Energy.

Further, it's important to note that First Energy/Met-Ed remain the face of the power lines. MAIT has not provided any required notices to myself or the neighborhood regarding work on the power lines or for the project to replace the current poles as required. Instead, it has been First Energy/Met-Ed that sent Mr. Ray Lilliston, senior right of way agent that works with AFS, around the neighborhood explaining the project. Further, it was First Energy/Met-Ed that sent out required notice letters to the neighborhood (See Enclosure 1). As such, I contend that First Energy/Met-Ed are still involved in the operations of the powerlines or MAIT is in serious breach or required public notice requirements.

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

Michael R. Florio

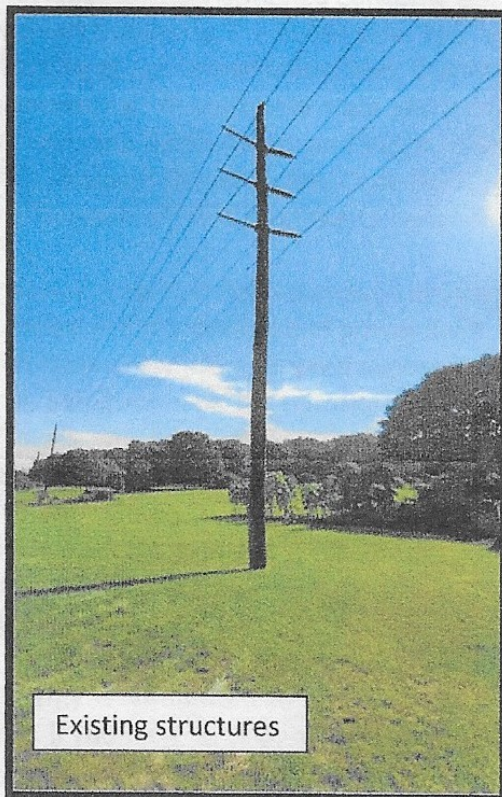
Copy to: Honorable Mark A. Hoyer
Honorable John Coogan
Roger, Rizzo & Darnall (ATTN: Ms. Morris)

September 1, 2021

Campbelltown – Middletown – North Hershey 69-kV Transmission Line Rebuild

As part of FirstEnergy's ongoing commitment to enhancing electric service, FirstEnergy is rebuilding an existing 69-kilovolt transmission line to strengthen the electric system in Derry Township and surrounding areas.

You are receiving this letter in response to inquiries regarding the project in the Meadows housing development. The project between Sand Hill Road and Nye Road will replace existing wood poles averaging about 53 feet tall with new wood poles that average about 59 feet tall. In addition, the seven existing wires will be replaced with four wires.



The new transmission poles are similar in height to the prior poles and reduce the number of wires from 7 to 4.

FirstEnergy continues to work with individual landowners who have requested changes to the project design, and engineers are making revisions at those locations where possible.

While FirstEnergy received requests from some residents to place this transmission line underground through the Meadows development, the company constructs transmission lines underground only when there are no viable above-ground options. The open trenching necessary to bury transmission lines causes greater environmental impacts, as does the need to create significant access roads to accommodate heavy equipment. It is also more difficult to restore power during outages on underground lines because it takes longer to identify and repair damaged cable.

In addition, it is significantly more expensive to run transmission lines underground. The costs of transmission lines in Pennsylvania are spread across the rate base of all FirstEnergy customers in the state, much like the public highway system. It is not reasonable to place the additional financial burden on our other customers for local aesthetic concerns over the visibility of an overhead transmission line.

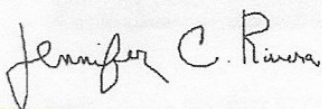
Several landowners mentioned concerns with electric and magnetic fields (EMF). FirstEnergy is committed to keeping the public safe. This applies to all aspects of our operations, including the design and routing of our transmission lines. Our facilities are built and operated with strict adherence to the requirements of all applicable state and federal statutes related to safety, including requirements specified in the North American Electric Reliability Corporation (NERC) Mandatory Reliability Standards and the National Electric Safety Code (NESC), as well as those adopted by the Public Utilities Commission of Pennsylvania (PAPUC) and the Occupational Health and Safety Administration (OSHA).

Electric and magnetic fields surround anything that transmits or uses electricity, including household appliances, cellular devices and power lines. There are no federal exposure limits in the United States, and no state agency has adopted exposure limits based on a finding that EMF causes adverse health effects. Some scientific organizations have recommended exposure guidelines for settings with very high EMF levels, which are far greater than any EMF levels found in our environment, including those near transmission lines.

Additional information about electric and magnetic fields and health can be found on the FirstEnergy website at the following link: <https://www.firstenergycorp.com/content/customer/help/safety/using-electricity/emf.html>

FirstEnergy is committed to addressing questions and to providing support during construction of the project. If you have additional questions, please call our project hotline at 1-888-311-4737.

Sincerely,



Jenn Rivera

Regional External Affairs Consultant

FirstEnergy Service Company on behalf of Metropolitan Edison Company

FirstEnergy / Met-Ed
Attn: Richard Brandt, 72
501 Parkway Blvd.
York, PA 17404

Michael R Florio
1965 Sand Hil Rd.
Hershey, PA 17033



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Re: Notification of Planned Transmission Line Work

Dear Michael R Florio:

You have been identified as a property owner with a Met-Ed, A FirstEnergy company transmission line right-of-way crossing your property. These transmission lines provide power to thousands of electric customers and are vital reliability links with other utilities. Maintaining transmission line rights-of-way that are free of incompatible vegetation is necessary to provide safe and reliable electric service.

The purpose of this letter is to notify you that vegetation management work is planned for your property in 2020. A professional tree company has been contracted to perform the vegetation management work. Your cooperation in accomplishing this important task will be greatly appreciated.

Federal and state regulations require FirstEnergy companies and other operators to properly maintain transmission lines in order to provide for the safe and reliable operation of the transmission system. This requires reliability inspections and routine vegetation maintenance. Vegetation maintenance practices involve identifying tall-growing, woody stemmed vegetation and trees located within the transmission rights-of-way and removing those that interfere or may potentially interfere with the operation of the transmission facilities. Trees adjacent to the right-of-way that are unhealthy, leaning, or significantly encroaching the corridor also could be targeted for removal.

FirstEnergy company's comprehensive vegetation management program involves multiple widely used forestry procedures and techniques to safely and effectively maintain the transmission line rights-of-way.

Part of the focus of this work will include targeting Ash trees that are dead or alive due to their possible threat to the reliability of the transmission system. Ash trees are under attack from an infestation of the "Emerald Ash Borer", an introduced pest that bores into and kills all species of Ash (*Fraxinus*). Ash trees and other dead or dying trees to be affected will be identified using special symbols by a FirstEnergy representative to ensure reliable service to the electrical system. For example, trees to be removed are marked with an "X"; and trees to be pruned are identified with a vertical line "I." For additional information on the "Emerald Ash Borer" visit FirstEnergy's website <https://www.firstenergycorp.com/help/safety/trees/why-we-prune-trees.html>

This work will be accomplished manually by tree crews or mechanically, using a helicopter equipped with a specialized saw suspended on a boom to mitigate trees that are in remote areas or pose a threat to tree worker's safety due to Ash trees failure characteristics. Branches and trees that fall onto access roads, maintained yard areas, agricultural fields or in streams during the manual or aerial tree operation will be cleaned up, or moved to adjacent wooded areas by ground crews shortly after the work is performed.

The stumps/stubble of the cleared vegetation will be treated with an EPA-registered herbicide to minimize re-sprouting and root suckering that typically follows mechanical removal. Nearly 60 years of university and industry research has shown that herbicide use on rights-of-way can create optimum plant and wildlife habitats. Ultimately, using herbicides to target specific vegetation results in power line corridors that are clear of tall, fast-growing vegetation, with no effect on adjacent or nearby properties.

Herbicides also may be applied directly to the leaves or stems of smaller woody-stemmed vegetation. This control method may be applied in several ways. A ground application where personnel use either backpack sprayers, or ATV's and truck-mounted equipment can be used to apply herbicides along fence rows, tower bases, and other light density brush areas.

All applications will be performed within the FirstEnergy company's transmission line right-of-way and only where woody-stemmed brush exists. All herbicides used on ROW's are applied by state-certified applicators or under the supervision of a certified applicator.

As part of our inspection, compatible shrubs that do not interfere with transmission facilities are not disturbed. The ideal transmission line right-of-way includes a diverse mixture of grasses, low growing shrubs and other ground cover preferred by birds, deer and small animals to promote a thriving wildlife habitat. In this way, well-managed transmission rights-of-way provide food and cover wildlife need to survive.

Below is a general time line for this year's vegetation maintenance activities:

- Landowner notification – (Receipt of this letter is your notification)
- Work Planners marking trees (Between March – June - approximately 2 weeks to 45 days of receiving letter)
- Tree Work – Tree Removal, Tree Pruning, and Brush Mowing (March – December)
- Herbicide Application (June – September)

While this letter provides important information about FirstEnergy company's vegetation management program, its contents and the work performed shall not in any way limit or change the rights or privileges granted by any easements attached to or conveyed to this property and recorded in the County Recorder's office.

We appreciate your understanding and cooperation in our ongoing efforts to provide safe and reliable electric service to our customers. If you have any questions, concerns or special conditions, please contact: Kate Rutt, 717-803-6766.

Sincerely,

Kate Rutt
ECI
Consulting Utility Forester
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Ray Lilliston

Sr. Right of Way Agent

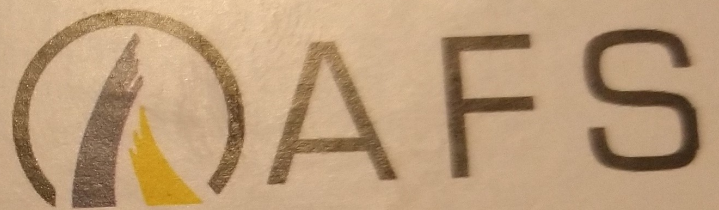
rlilliston@afsrow.com

O: 740.868.8203

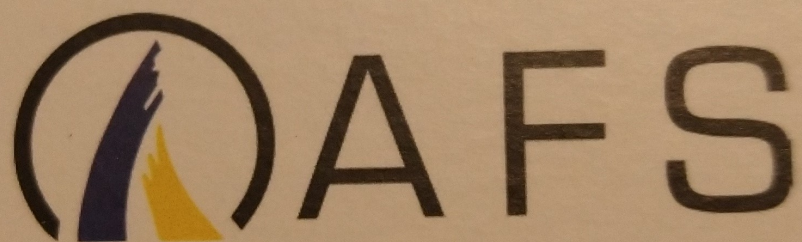
C: 267.496.7685

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Representing FirstEnergy



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Solutions Oriented Acquisition Spec