

February 8, 2022

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

Re: Docket No. C-2021-3028464

Tracy and Jill Troutman v. Metropolitan Edison Company

Answer to Motion for Judgement on the Pleadings of Metropolitan Edison Company

Dear Ms. Chiavetta:

In response to the Motion of Metropolitan Edison Company For Judgement On the Pleadings received from Margaret A. Morris, Esq. on January 11, 2022, we are submitting our acknowledgement of its receipt and our intention to continue to pursue this matter. Below are our responses to Met-Ed's Motion.

PROCEDURAL BACKGROUND

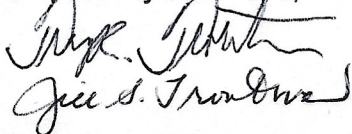
1. Agree. We filed a complaint September 7, 2021 listing First Energy/Met-Ed disputing the decision to replace overhead transmission lines through our neighborhood (The Meadows). We agree that we are customers of PPL Electric Utilities, and not a customer of Metropolitan Edison Company (ME).
2. We acknowledge from the information sent by Ms. Morris arguing that the Transmission lines are owned by Mid-Atlantic Interstate Transmission, LLC (MAIT). However, a letter was sent directly to us (as well as others in the neighborhood), dated September 1, 2021, discussing that "FirstEnergy is rebuilding an existing 69-kilovolt transmission line.....in Derry Township...". The letter attempts to address the neighborhood's concerns about the transmission lines. Of importance, it is signed by "Jenn Rivera, Regional External Affairs Consultant, FirstEnergy Company, on behalf of Metropolitan Edison Company". Additionally, the following quotes are from the Mid-Atlantic Transmission LLC (MAIT) Audit Financial Statements – for the Years Ended December 31, 2020 and 2019..... "MAIT, which is organized under Delaware law, is a subsidiary of First Energy Transmission (FET), a direct subsidiary of First Energy (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..." Thus, regardless of ownership of the lines, it appears that FirstEnergy, FirstEnergy Transmission and Met-Ed do have decision-making responsibility in this project.
3. Agree. Per the document sent by us on October 14, 2021, MAIT has ownership of the transmission lines. However, referring to Point #2 above, FirstEnergy/First Energy Transmission/Met-Ed is also a part of the ownership and also part of the decision making process to replace the transmission lines.

4. Of note, our original Complaint of September 7, 2021 did list both First Energy and Met-Ed, however First Energy was never listed as a respondent. We are requesting that MAIT, First Energy, and First Energy Transmission be added to the complaint.
5. Agree. We participated in the Pre-Hearing Conference via telephone on February 3, 2022 with Judges Mark Hoyer, John Coogan and Attorney Margaret Morris.
6. No Additional Comments
7. No Additional Comments
8. No Additional Comments
9. No Additional Comments
10. No Additional Comments
11. No Additional Comments
12. No Additional Comments
13. Reference Point #2 above. We acknowledge from the information sent by Ms. Morris arguing that the Transmission lines are owned by Mid-Atlantic Interstate Transmission, LLC (MAIT). However, per the letter sent directly to us as well as others in the neighborhood, dated September 1, 2021, discussing that "FirstEnergy is rebuilding an existing 69-kilovolt transmission line.....in Derry Township...". The letter attempts to address the neighborhood's concerns about the transmission lines. Of importance, it is signed by "Jenn Rivera, Regional External Affairs Consultant, FirstEnergy Company, on behalf of Metropolitan Edison Company". Thus, we assert that Met-Ed is part of the ownership and decision making process of this project.
14. It is our intention to amend our Complaint to include MAIT, FirstEnergy, First Energy Transmission and Met-Ed.

CONCLUSION

There is no dispute that the owner of the transmission line includes MAIT. However, it does appear that Met-Ed, First Energy, and First Energy Transmission are still part of the ownership and decision-making process for the replacement of the transmission lines/poles. Our desire is to include all these parties in the Complaint.

Respectfully submitted,



Tracy and Jill Troutman

Cc:

The Hon. Mark A. Hoyer, PA Public Utility Commission
The Hon. John Coogan, PA Public Utility Commission
Margaret A. Morris, Esquire representing Metropolitan Edison Company
Tori Giesler, Esquire, FirstEnergy Service Company