

March 24, 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 and Margaret Marino v. Mid-Atlantic Interstate Transmission, LLC  
Response to Preliminary Objections of MAIT to Amended Complaint

Dear Secretary Chiavetta:

Attached for filing is our Response to the "Preliminary Objections of the Mid-Atlantic Interstate Transmission, LLC to the Amended Complaint" submitted by Margaret A. Morris, Esquire, Dated March 15, 2022.

A copy of this Response has been provided to Attorney Margaret Morris.  
If there are any questions, please do not hesitate to contact us.

Sincerely,

*Michael L. Marino*  
*Margaret Marino*

Michael and Margaret Marino

cc: The Hon. Mark A. Hoyer, PA Public Utilities Commission  
The Hon. John Coogan, PA Public Utilities Commission  
Tori Giesler, Esquire, FirstEnergy Service Company  
Margaret Morris, Esquire, Representing MAIT

**Response to the Preliminary Objections of Mid-Atlantic Interstate Transmission, LLC (MAIT) to the Amended Complaint submitted by Margaret A. Morris, Esquire, dated March 15, 2022.**

**I. Procedural Background**

1. We agree that we filed an Amended Complaint against FirstEnergy/Met-Ed that included MAIT, FirstEnergy Transmission, LLC, and Metropolitan Edison Company.
2. We agree that the Transmission Lines do not cross our property. However, we are directly impacted by the transmission lines. The Transmission Lines cross public sidewalks, roadways, and common areas that we use multiple times daily and therefore impact us directly.
3. We disagree. As stated previously, the Transmission Lines cross public sidewalks, roadways, and common areas that we use multiple times daily and therefore impact us directly. The existence of the poles and well as Transmission Lines, prevent neighborhood families from using a portion of their properties as well as the common areas.

**II. Argument**

4. Refer to Responses in #2 and #3 above.
5. Refer to Responses in #2 and #3 above.
6. We disagree. We do have a direct, immediate, and substantial interest in this case. Please refer to responses in #2 and #3 above.
7. We contend that we have a direct, immediate, and substantial interest in the subject matter of our complaint. We disagree with the implication that our complaint is “frivolous and harassing”. In addition to Responses #2 and #3 above, there are several disconcerting incidents that involved transmission lines in our neighborhood.
  - Dr. Andrew Friberg, “I witnessed a lightning strike, on a pole behind our house several years ago. Smoke, but no fire from the pole, fortunately”.
  - Dr. Byung Joo, witnessed the transformer behind the Lennon family house explode, spark and catch fire during a severe thunderstorm.
  - We, Michael & Margaret Marino, witnessed a downed transmission line sparking on the property of 53 Hawthorne Drive a few years ago. We do not recall the cause or exact date of the event.
8. We disagree that our complaint is “mere conjecture” about possible future harm and does not confer a direct interest in this complaint -review Responses #2, #3, and #7. Additionally, the Derry Township Ordinance §185-38 Underground wiring states “all electric, telephone, television, and other communication service lines which are newly installed to serve development activity regulated by this chapter shall be installed underground”. Although the Derry Township Ordinance does not pertain to the Transmission Lines in this complaint, since they were installed prior to this code, the new code promotes safety for the Township and the environment.
9. We agree the Transmissions Lines do not cross our property. However, we disagree that we do not have a direct, immediate, or substantive interest in this complaint. As stated in this

document, the Transmission Lines cross several common areas, sidewalks, and streets that we use daily.

### III. Conclusions

- As stated in all the Responses above, we do have a direct, immediate, and substantial interest in this complaint.
- This complaint is not requesting miles of transmission lines be placed underground. Currently the Transmission Lines in the Meadows Development cover approximately .37 miles.
- According to FirstEnergy's Mission Statement (MAIT is a subsidiary) they are a "forward thinking electric utility centered on integrity, powered by a diverse team of employees committed to making customers' lives brighter, the environment better, and our community stronger". Do FirstEnergy/MAIT actions exemplify their mission statement? Placing the Transmission Lines underground may not be the least expensive option but would be the correct action to take and demonstrate adherence to their current mission statement.

Respectively,

*Michael J. Marino*  
*Margaret Marino*

Michael and Margaret Marino

cc: The Hon. Mark A. Hoyer, PA Public Utilities Commission  
The Hon. John Coogan, PA Public Utilities Commission  
Tori Giesler, Esquire, FirstEnergy Service Company  
Margaret Morris, Esquire, Representing MAIT