

March 31, 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. Metropolitan Edison Company, et al.  
Response to Answer and New Matter of Metropolitan Edison Company to Amended Complaint

Dear Secretary Chiavetta:

Attached for filing is our Response to the Answer and New Matter of the Metropolitan Edison Company, et al., 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 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 Answer and New Matter of Metropolitan Edison Company, et. al. to the Amended Complaint submitted by Margaret A. Morris, Esquire, dated March 15, 2022.**

1. As stated.
2. We agree that Metropolitan Edison is the responding Utility, however we disagree that Met-Ed is not an appropriate respondent in this matter. We believe First Energy, Met-Ed, and MAIT are all involved since they are all connected. Met-Ed is the owner of the easement and a subsidiary of the Holding Company FirstEnergy. On September 1<sup>st</sup>, 2021, we received a letter on FirstEnergy letterhead stating “FirstEnergy is rebuilding an existing 69-kilovolt transmission line...”. This letter authored by Jenn Rivera, Regional External Affairs Consultant, FirstEnergy Service Company on behalf of Metropolitan Company. Interestingly, there is no mention of MAIT in this letter, yet in the filing for the Answer and New Matter of Mid-Atlantic Transmission, LLC (MAIT) dated March 15, 2022 from Margaret A. Morris, Esquire, states “MAIT is replacing the overhead transmission facilities for the 72 (Campbelltown-Middletown-North Hershey) 69 kV Transmission Line...).
3. We agree PPL provides electric service to 46 Hawthorne Dr. Hershey, PA 17033; all utilities that service the development are underground. We also understand that the easement is owned by Met-Ed and is not on our property. Being a PPL customer does not preclude us from making a Formal Complaint against FirstEnergy, Metropolitan Edison, and MAIT to the PUC.
4. Again, we disagree that “the Complainants have been provided reasonable and adequate service in accordance with all applicable laws”. We were denied any direct communication with any of the three Respondents after numerous requests. For example, a Meadows Development resident expressed concerns about the Transmission Lines for the neighborhood, several attempts were made to schedule a meeting with a Utility representative to discuss our concerns. Mr. Ray Lilliston, Sr., Right of Way agent for Appalachian Field Service confirmed he received and forwarded the messages to First Energy, not MAIT on 7/22/21, 8/8/2021, and 8/17/21 for review. At that time Appalachian Field Service was working on this Transmission Lines project. The concerned neighbor requested to speak with a utility company representative. However, the multiple requests were ignored. In order to be heard, Meadows’ residents were forced to submit Formal Complaints to the PUC to be heard.
5. Refer to responses # 2 and # 3.
6. As stated
7. A. B. C. As stated
8. As stated
9. As stated
10. As stated

## NEW MATTER

11. We acknowledge that MAIT owns the Transmission Lines, however, FirstEnergy and Met-Ed are all connected and have a vested interest in this project. None of the three companies hold sole responsibility for this matter and therefore cannot act independent of each other. The decision by MAIT to rebuild the Transmission Lines with “like” facilities does not exclude undergrounding and should be considered seriously by the management of MAIT, FirstEnergy and Met-Ed. **Again, if safety being the 1st concern and priority of all parties, undergrounding is the only logical choice!**

Additionally, placing the Transmission Lines underground would minimize service disruptions to Met-Ed customers, possible lawsuits (ie. Thomas Poynton, PUC Formal Complaint Electronic filing, Docket NO: C-2019-301165) and potential safety issues in the Meadows Development. A recent precedent was established in Derry Township, when a neighborhood objected to PP&L’s replacement of overhead Transmission Lines, voiced their concerns and requested underground Transmission Line placement. PP&L listened to the concerns, agreed and removed the overhead Lines replacing them with underground Transmission Lines. We are asking FirstEnergy, Met-Ed and MAIT to also be industry leaders by placing Transmission Lines underground within the Meadows Development.

12. Refer to response in # 3.
13. We disagree. First Energy, Met-Ed, and MAIT are all involved since they are all connected. Met-Ed is the owner of the easement and a subsidiary of the Holding Company FirstEnergy. On September 1<sup>st</sup>, 2021, we received a letter on FirstEnergy letterhead stating “FirstEnergy is rebuilding an existing 69-kilovolt transmission line...”. This letter authored by Jenn Rivera, Regional External Affairs Consultant, FirstEnergy Service Company on behalf of Metropolitan Company. Interestingly, there is no mention of MAIT in this letter, yet in the filing for the Answer and New Matter of Mid-Atlantic Transmission, LLC (MAIT) dated March 15, 2022 from Margaret A. Morris, Esquire, states “MAIT is replacing the overhead transmission facilities for the 72 (Campbelltown-Middletown-North Hershey) 69 kV Transmission Line...).

### Summary

- 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.
- Met-Ed is a FirstEnergy Company. According to the FirstEnergy Company Mission Statement, 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/Met-Ed, MAIT actions exemplify the mission statement? Placing the Transmission Lines underground may not be the least expensive option but would be the correct and safest decision to demonstrate adherence to their current mission statement.

Respectively,

*Michael L. Marino*  
*Margaret A. 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