

July 20, 2022

Via Electronic Filing

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

**Re: Docket Nos. C-2021-3028278, et al.
Rebecca Walizer, et al. v. Metropolitan Edison Company, et al.
Prehearing Memorandum of Met-Ed and MAIT**

Dear Secretary Chiavetta:

Attached for filing is the Prehearing Memorandum on behalf of Metropolitan Edison Company and Mid-Atlantic Interstate Transmission, LLC (collectively Respondents) in the above-referenced proceeding.

A copy of the Prehearing Memorandum has been forwarded to Complainants in the manner indicated on the attached Certificate of Service.

If there are any questions, please do not hesitate to contact me.

Very truly yours,

Reger Rizzo & Darnall LLP



Margaret A. Morris

MAM/co
Enclosure

cc: The Hon. Mark A. Hoyer, PA Public Utility Commission [w/encls.]
The Hon. John Coogan, PA Public Utility Commission [w/encls.]
Tori Giesler, Esquire, FirstEnergy Service Company [w/encls.]
Service List [w/encls.]

**Re: Docket Nos. C-2021-3028278, et al.
Rebecca Walizer, et al. v. Metropolitan Edison Company, et al.
Prehearing Memorandum of Met-Ed and MAIT**

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document has been served upon the following person(s), in the manner indicated, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

Via Electronic Mail

Debora N. Connell
198 Bittersweet Drive
Hershey, PA 17033
dconnell831@gmail.com

Michael and Margaret Marino
46 Hawthorne Drive
Hershey, PA 17033
Mikelmario923@gmail.com

Rebecca Sue Walizer
60 Bittersweet Drive
Hershey, PA 17033
Rswalizer79@comcast.net

Samantha Bryant
53 Hawthorne Drive
Hershey, PA 17033
samanthabryant66@gmail.com

Michael R. Florio
1965 Sand Hill Road
Hershey, PA 17033
98ford.mike@gmail.com

Pingqi Dai
87 Hawthorne Drive
Hershey, PA 17033
pdai1211@yahoo.com

Michael David Kramer
156 Bittersweet Drive
Hershey, PA 17033
mdkramer36@hotmail.com

Stanley and Eileen Krasinski
172 Bittersweet Drive
Hershey, PA 17033
krasinski01@verizon.net

Corey and Betty Rigberg
59 Bittersweet Drive
Hershey, PA 17033
king.charlie@verizon.net

Andrew S. Freiberg
115 Bittersweet Drive
Hershey, PA 17033
afreiberg@pennstatehealth.psu.edu

Neal Walmer
230 Sawleaf Circle
Hershey, PA 17033
neal.walmer1@gmail.com

Michael and Karen Fedash
25 Hawthorne Drive
Hershey, PA 17033
karenjf1981@gmail.com

Tracy and Jill Troutman
160 Hawthorne Drive
Hershey, PA 17033
Troutmantracy@outlook.com

Gregory L. Bair
109 Hawthorne Drive
Hershey, PA 17033
gbair@comcast.net

Via Electronic and First-Class Mail

Patricia and John Lane
134 Bittersweet Drive
Hershey, PA 17033
dadalan@msn.com

Dated: July 20, 2022


Margaret A. Morris, Esquire

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Tracy and Jill Troutman	C-2021-3028464
Rebecca Walizer	C-2021-3028278
Neal Walmer	C-2021-3028416
Michael and Margaret Marino	C-2021-3028211
Stanley and Eileen Krasinski	C-2021-3028346
Michael Florio	C-2021-3028286
Samantha Bryant	C-2021-3028283
Michael Kramer	C-2021-3028314
Andrew Freiberg	C-2021-3028414
Karen Fedash	C-2021-3028418
Gregory Bair	C-2022-3030530

v.

Metropolitan Edison Company
Mid-Atlantic Interstate Transmission, LLC

Pingqi Dai	C-2021-3028302
Debra Connell	C-2021-3028186
Corey and Betty Rigberg	C-2021-3028348
Patricia Lane	C-2021-3028627

v.

Metropolitan Edison Company

**PREHEARING CONFERENCE MEMORANDUM OF METROPOLITAN EDISON
COMPANY AND MID-ATLANTIC INTERSTATE TRANSMISSION, LLC**

Pursuant to the Second Interim Order Consolidating Proceedings and Setting Prehearing Conference of the Honorable Mark A. Hoyer and John M. Coogan dated, June 6, 2022 (*Order*) and Commission regulations at 52 Pa. Code § 5.222, Metropolitan Edison Company and Mid-Atlantic Interstate Transmission, LLC (collectively referred to as Respondents for purposes of this Prehearing Memo), submits the following in response to Paragraph 3 of the *Order*.

(i) *The presently identified issues*

The Complainants have the burden of proof in this consolidated proceeding to show that MAIT and/or Met-Ed is in violation of a law or a Commission regulation that has a discernable effect on the Complainants, over which the Commission has jurisdiction. The Complainants must prove that MAIT and/or Met-Ed violated the Public Utility Code, a Commission regulation or order or the Commission-approved tariff of MAIT and/or Met-Ed. The Respondents reserve the right to address additional issues as they may arise during the proceeding.

The respective Formal Complaints have alleged the following allegations/issues with the Proposed Project:

1. Underground lines are aesthetically more pleasing.
2. Overhead lines negatively impact property value.
3. Associated health risks with overhead lines.
4. Associated safety issues with overhead lines.
5. Overhead lines are more susceptible to outages.

(ii) *The names and addresses of the witnesses*

Respondents will offer the following witnesses but reserves the right to call any additional witnesses as discovery and other matters develop prior to the hearing and based on issues identified by the Complainants in their written direct testimony.

Name and address of MAIT witness:

Donald E. Williams, BSEE, MBA, CIA
Transmission Engineer IV-Transmission Maintenance
2800 Pottsville Pike
Reading, PA 19612
dewilliams@firstenergycorp.com

Name and address of Met-Ed witness:

Michael Espinoza, Sr
Real Estate Representative
300 Madison Avenue
Morristown, NJ 07962
mmespinoza@firstenergycorp.com

(iii) *The proposed area of testimony of each witness*

The scope of the MAIT witness:

- Scope of In-Kind Replacement Project

- Need for In-Kind Replacement Project
- Design of In-Kind Replacement Project

The scope of the Met-Ed witness:

- Obligation retained for Transmission Line
- Easements held for Transmission Line

(iv) Proposed procedural schedule

The Respondents are agreeable to any reasonable proposed litigation schedule and suggests the following dates:

Complainants Direct Written Testimony ¹ and Proposed Exhibits	September 9, 2022
Respondents Direct Written Testimony And Proposed Exhibits	October 24, 2022 45 days from Complainants Direct
Complainants Rebuttal Written Testimony	November 8, 2022 15 days from Respondents Direct
Respondents Rebuttal Written Testimony	November 23, 2022 15 days from Complainants Rebuttal
Exchange Proposed Stipulated Facts and Proposed Joint Exhibits	December 6, 2022
Telephonic Hearing	December 14, 2022
Main Briefs	30 days after receipt of transcript
Reply Briefs	15 days after Main Briefs

Respectfully submitted,

Margaret A. Morris, Esq.
 Attorney ID No. 75048
 Reger Rizzo & Darnall LLP
 Cira Centre, 13th Floor
 2929 Arch Street
 Philadelphia, PA 19104
 (215) 495-6524 tel.
mmorris@regerlaw.com

Dated: July 20, 2022

*Counsel for Metropolitan Edison Company and
 Mid-Atlantic Interstate Transmission, LLC*

¹ Written prepared testimony shall be substantially in compliance with the Commission’s regulations, 52 Pa. Code Chapters 1, 3 and 5, in particular 52 Pa. Code § 5.412(e).