



COMMONWEALTH OF PENNSYLVANIA
PENNSYLVANIA PUBLIC UTILITY COMMISSION
COMMONWEALTH KEYSTONE BUILDING
400 NORTH STREET, HARRISBURG, PA 17120

BUREAU OF
INVESTIGATION
&
ENFORCEMENT

March 31, 2023

Via Electronic Mail

David B. MacGregor, Esq.
Devin T. Ryan, Esq.
Garrett P. Lent, Esq.
Megan E. Rulli, Esq.
Post and Schell, PC
17 North Second Street, 12th Floor
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Re: Joint Application of Metropolitan Edison Company, Pennsylvania Electric Company, Pennsylvania Power Company, West Penn Power Company, Keystone Appalachian Transmission Company, Mid-Atlantic Interstate Transmission, LLC, and FirstEnergy Pennsylvania Electric Company
Docket Nos. A-2023-3038771, A-2023-3038792, A-2023-3038793,
A-2023-3038794, A- 2023-3038795, A-2023-3038807,
A-2023-3038808, G-2023-3038818, G-2023-3038819,
G-2023-3038820, G-2023-303882, G-00020956

I&E Interrogatories – Set I

Dear Counsel:

Enclosed please find the Bureau of Investigation and Enforcement's (I&E) **Interrogatories Set I (nos. 1-7) – Spadaccio** in the above-captioned proceeding. Please restate each Interrogatory before responding and start each Interrogatory and response on a separate page. The responses should identify the responding person(s).

The responses to these Interrogatories are due within twenty (20) calendar days of service. Please provide your responses to me via email at the email address listed below.

Copies are being served on parties per the attached Certificate of Service. Should you have any questions, please do not hesitate to contact me.

Sincerely,

Scott B. Granger
Prosecutor
Bureau of Investigation and Enforcement
PA Attorney ID No. 63641
(717) 425-7593
sgranger@pa.gov

cc: Rosemary Chiavetta, Secretary (*Cover Letter and Certificate of Service only – via e-file*)
Per Certificate of Service

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Joint Application of Metropolitan Edison	:	
Company, Pennsylvania Electric Company,	:	
Pennsylvania Power Company, West Penn Power	:	
Company, Keystone Appalachian Transmission	:	
Company, Mid-Atlantic Interstate Transmission,	:	Docket Nos. A-2023-3038771
LLC, and FirstEnergy Pennsylvania Electric	:	A-2023-3038792
Company for All of the Necessary Authority,	:	A-2023-3038793
Approvals, and Certificates of Public Convenience	:	A-2023-3038794
for (1) the Agreements and Plans of Merger; (2) the	:	A-2023-3038795
Establishment of FirstEnergy Pennsylvania Holding	:	A-2023-3038807
Company LLC as an Intermediate Holding	:	A-2023-3038808
Company in the Chain of Ownership of FirstEnergy	:	G-2023-3038818
Pennsylvania Electric Company; (3) the Merger of	:	G-2023-3038819
Metropolitan Edison Company, Pennsylvania	:	G-2023-3038820
Electric Company, Pennsylvania Power Company,	:	G-2023-3038821
and West Penn Power Company with and into	:	G-00020956
FirstEnergy Pennsylvania Electric Company; (4)	:	
the Initiation by FirstEnergy Pennsylvania Electric	:	
Company of Electric Service in All Territories in	:	
this Commonwealth where Metropolitan Edison	:	
Company, Pennsylvania Electric Company,	:	
Pennsylvania Power Company, and West Penn	:	
Power Company Do or May Provide Electric	:	
Service; (5) the Abandonment by Metropolitan	:	
Edison Company, Pennsylvania Electric Company,	:	
Pennsylvania Power Company, and West Penn	:	
Power Company of All Electric Service in this	:	
Commonwealth; (6) the Adoption by FirstEnergy	:	
Pennsylvania Electric Company of Metropolitan	:	
Edison Company, Pennsylvania Electric Company,	:	
Pennsylvania Power Company, and West Penn	:	
Power Company's Existing Tariffs and their	:	
Application within New Service and Rate Districts	:	
of FirstEnergy Pennsylvania Electric Company	:	
Corresponding to their Existing Service Territories	:	
as the Met-Ed Rate District, ii Penelec Rate	:	
District, Penn Power Rate District, West Penn Rate	:	
District, and The Pennsylvania State University	:	
Rate District, Respectively; (7) the sale of Class B	:	
Membership Interests in Mid-Atlantic Interstate	:	
Transmission, LLC held by Met-Ed and Penelec to	:	
FirstEnergy Corp.; (8) the Contribution of West	:	
Penn Power Company's Transmission Assets to	:	
Keystone Appalachian Transmission Company; (9)	:	
a Certificate of Public Convenience Conferring	:	
Upon Keystone Appalachian Transmission	:	
Company the Status of a Pennsylvania Public	:	

Utility; (10) Where Necessary, Associated :
Affiliated Interest Agreements; and (11) Any Other :
Approvals Necessary to Complete the :
Contemplated Transaction :

CERTIFICATE OF SERVICE

I hereby certify that I am serving the foregoing **Interrogatories – Set I** dated March 31, 2023, in the manner and upon the persons listed below:

Served via Electronic Mail Only

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