
Garrett P. Lent

glent@postschell.com
717-612-6032 Direct
717-731-1985 Direct Fax
File #: 194562

April 21, 2023

VIA ELECTRONIC FILING

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor North
P.O. Box 3265
Harrisburg, PA 17105-3265

**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, et al.**


Dear Secretary Chiavetta:

Attached for filing is the Prehearing Conference Memorandum of Metropolitan Edison Company (“Met-Ed”), Pennsylvania Electric Company (“Penelec”), Pennsylvania Power Company (“Penn Power”), West Penn Power Company (“West Penn”), Keystone Appalachian Transmission Company (“KATCo”), Mid-Atlantic Interstate Transmission, LLC (“MAIT”), and FirstEnergy Pennsylvania Electric Company (“FE PA”), hereinafter, collectively, the “Joint Applicants” in the above-referenced proceeding.

Copies of the Joint Applicants’ Prehearing Conference Memorandum have been served as provided on the certificate of service.

Please direct any questions regarding this submission to the undersigned.

Respectfully submitted,


Garrett P. Lent

GPL/dmc

Rosemary Chiavetta, Secretary
April 21, 2023
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Enclosures

cc: The Honorable Conrad A. Johnson (*c/o nmiskanic@pa.gov; w/attachments*)
The Honorable Emily I. DeVoe (*c/o nmiskanic@pa.gov; w/attachments*)
Certificate of Service

CERTIFICATE OF SERVICE

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

VIA E-MAIL ONLY

Laura N. Berman, Esquire
John W. Sweet, Esquire
Ria M. Pereira, Esquire
Elizabeth R. Marx, Esquire
Pennsylvania Utility Law Project
118 Locust Street
Harrisburg, PA 17101
pulp@pautilitylawproject.org
Counsel for CAUSE-PA

Scott B. Granger, Esquire
Bureau of Investigation & Enforcement
Commonwealth Keystone Building
400 North Street, 2nd Floor West
PO Box 3265
Harrisburg, PA 17105-3265
sgranger@pa.gov

Aron Beatty, Esquire
Christy M. Appleby, Esquire
Andrew J. Zerby, Esquire
Office of Consumer Advocate
555 Walnut Street
Forum Place, 5th Floor
Harrisburg, PA 17101-1923
abeatty@paoca.org
cappleby@paoca.org
azerby@paoca.org

Sharon E. Webb, Esquire
Nakea Hurdle, Esquire
Office of Small Business Advocate
555 Walnut Street
Forum Place, 1st Floor
Harrisburg, PA 17101
sgray@pa.gov
nhurdle@pa.gov

Thomas J. Sniscak, Esquire
Whitney Snyder, Esquire
Hawke McKeon & Sniscak LLP
100 North Tenth Street
Harrisburg, PA 17101
tjsniscak@hmslegal.com
wesnyder@hmslegal.com
Counsel for The Pennsylvania State University

Deanne M. O'Dell, Esquire
Karen O. Moury, Esquire
Eckert Seamans Cherin & Mellott, LLC
213 Market Str., 8th Floor
P.O. Box 1248
dodell@eckertseamans.com
kmoury@eckertseamans.com
Counsel for RESA

Derrick Price Williamson, Esquire
Barry A. Naum, Esquire
Steven W. Lee, Esquire
Spilman Thomas & Battle, PLLC
1100 Bent Creek Boulevard, Suite 101
Mechanicsburg, PA 17050
dwilliamson@spilmanlaw.com
bnaum@spilmanlaw.com
slee@spilmanlaw.com
Counsel for IECPA

John F. Lushis, Jr., Esquire
David Berger, Esquire
Norris McLaughlin, P.A.
515 W. Hamilton Street, Suite 502
Allentown, PA 1810
jlushis@norris-law.com
dberger@norris-law.com
Counsel for Calpine

Susan E. Bruce, Esquire
Charis Mincavage, Esquire
McNees Wallace & Nurick
100 Pine Street
PO Box 1166
Harrisburg, PA 17108-1166
sbruce@mcneeslaw.com
cmincavage@mcneeslaw.com
*Counsel for Met-Ed Industrial Users Group,
Penelec Industrial Customer Alliance, and
West Penn Power Industrial Intervenors*

Date: April 21, 2023


Garrett P. Lent

**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, LLC, and FirstEnergy Pennsylvania Electric Company for All of the Necessary Authority, Approvals, and Certificates of Public Convenience for (1) the Agreements and Plans of Merger; (2) the Establishment of FirstEnergy Pennsylvania Holding Company LLC as an Intermediate Holding Company in the Chain of Ownership of FirstEnergy Pennsylvania Electric Company; (3) the Merger of Metropolitan Edison Company, Pennsylvania Electric Company, Pennsylvania Power Company, and West Penn Power Company with and into 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,	:	
	:	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-2023-3038821
	:	G-00020956

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 :
:

**PREHEARING CONFERENCE MEMORANDUM 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**

**TO ADMINISTRATIVE LAW JUDGES CONRAD A. JOHNSON AND EMILY I.
DEVOE:**

Pursuant to 52 Pa. Code § 5.222(d) and the April 13, 2023 Prehearing Conference Order, Metropolitan Edison Company (“Met-Ed”), Pennsylvania Electric Company (“Penelec”), Pennsylvania Power Company (“Penn Power”), West Penn Power Company (“West Penn”),¹ Keystone Appalachian Transmission Company (“KATCo”), Mid-Atlantic Interstate

¹ Together, Met-Ed, Penelec, Penn Power, and West Penn are referred to as the “Pennsylvania OpCos.”

Transmission, LLC (“MAIT”) and FirstEnergy Pennsylvania Electric Company (“FE PA”), collectively, the “Joint Applicants,” hereby submit this Prehearing Conference Memorandum.

I. SERVICE OF DOCUMENTS

1. The Joint Applicants request that all documents be served on:

Garrett P. Lent, Esquire (PA ID #321566)
Post & Schell, P.C.
17 North Second Street, 12th Floor
Harrisburg, PA 17101-1601
Phone: (717) 731-1970
Fax: (717) 731-1985
E-mail: glent@postschell.com

Tori L. Giesler (ID # 207742)
Darshana Singh (ID # 330971)
FirstEnergy Service Company
2800 Pottsville Pike
P.O. Box 16001
Reading, PA 19612-6001
Phone: 610-921-6658
E-mail: tgiesler@firstenergycorp.com
E-mail: singhd@firstenergycorp.com

Please be advised that Mr. Garrett Lent will speak as the lead attorney for the Joint Applicants for purposes of the prehearing conference. However, other counsel for the Joint Applicants will be participating and available during the telephonic prehearing conference as needed.

2. The Joint Applicants agree to receive service of documents electronically in this proceeding. Further, to the extent that materials are available electronically, it is requested that copies also be served upon David B. MacGregor at dmacgregor@postschell.com, Devin T. Ryan at dryan@postschell.com, and Megan E. Rulli at mrulli@postschell.com.

II. PROCEDURAL HISTORY

3. The above captioned proceedings were initiated on March 6, 2023, when Met-Ed, Penelec, Penn Power, West Penn, KATCo, MAIT, and FE PA filed the “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 for All of the Necessary Authority, Approvals, and Certificates of Public Convenience for (1) the Agreements and Plans of Merger; (2) the Establishment of FirstEnergy Pennsylvania Holding Company LLC as an Intermediate Holding Company in the Chain of Ownership of FirstEnergy Pennsylvania Electric Company; (3) the Merger of Metropolitan Edison Company, Pennsylvania Electric Company, Pennsylvania Power Company, and West Penn Power Company with and into 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, 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” at 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-2023-3038821, G-00020956 (the “Joint Application”). The Joint Applicants requested that the Joint Application and any related dockets be consolidated for purposes of discovery, litigation, and disposition.

4. The Joint Application seeks certain approvals from the Commission associated with: (1) the proposed merger of Met-Ed, Penelec, Penn Power, and West Penn with and into FE PA (“Proposed Consolidation”); (2) the proposed sale of Class B membership interests in MAIT held by Met-Ed and Penelec to FirstEnergy Corp. (“FirstEnergy”) (“Proposed Sale of MAIT Class B Interests”); and (3) the proposed contribution of West Penn’s Transmission Assets to KATCo (“Proposed Transmission Contribution”). These three items are collectively referred to as the “Transaction.”

5. On March 8, 2023, the Commission issued a Secretarial Letter, which: (1) scheduled an initial telephonic prehearing conference for April 25, 2023, at 1:30 PM before Administrative Law Judges Conrad A. Johnson and Emily I. DeVoe (the “ALJs”); and (2) enclosed a copy of the Public Notice that would appear in the *Pennsylvania Bulletin*.

6. On March 16, 2023, the Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania (“CAUSE-PA”) filed a Petition to Intervene and Answer.

7. On March 23, 2023, the Office of Small Business Advocate (“OSBA”) filed a Notice of Appearance, Protest, and Notice of Intervention.

8. On March 29, 2023, the Commission’s Bureau of Investigation and Enforcement (“I&E”) filed its Notice of Appearance.

9. On April 4, 2023, the Office of Consumer Advocate (“OCA”) filed a Protest.
10. On April 5, 2023, the Industrial Energy Consumers of Pennsylvania (“IECPA”) filed a Petition to Intervene.
11. On April 13, 2023, the Commission issued a Prehearing Conference Order, which: (1) confirmed the telephonic prehearing conference would be held on April 25, 2023, at 1:30 p.m. before the ALJs; and (2) directed the parties to file Prehearing Conference Memoranda on or before 4:00 p.m. on Friday, April 21, 2023.
12. On April 14, 2023, the Met-Ed Industrial Users Group (“MEIUG”), Penelec Industrial Customer Alliance (“PICA”), and West Penn Power Industrial Intervenors (“WPPII”) (collectively, “Industrial Customer Groups”) filed a Joint Petition to Intervene and Protest.
13. On April 17, 2023, the Joint Applicants filed their Proofs of Publication evidencing that the notice of the Joint Application was published as directed by the Commission.
14. On April 17, 2023, Calpine Retail Holdings, LLC (“Calpine”) filed a Petition to Intervene.
15. Also on April 17, 2023, the Retail Energy Supply Association (“RESA”) filed a Petition to Intervene.
16. Also on April 17, 2023, The Pennsylvania State University (“PSU”) filed a Petition to Intervene.
17. Pursuant to 52 Pa. Code § 5.222(d) and the Prehearing Conference Order, the Joint Applicants hereby submit this Prehearing Conference Memorandum.

III. ISSUES AND EVIDENCE

18. The primary issue in this proceeding is whether the proposed Transaction is in the public interest. 66 Pa.C.S. §§ 1102(a)(1)-(3), 1103(a). The Joint Application, as well as the accompanying direct testimony and exhibits, demonstrate that the Commission should grant all

necessary authority, approvals and certificates of public convenience for the Transaction. Below, the Joint Applicants summarize the primary issues raised by the Transaction for the Commission's review.

A. THE PROPOSED CONSOLIDATION

19. First, the Joint Applicants intend to demonstrate that the Proposed Consolidation is necessary or proper and will result in substantial affirmative public benefits. The Joint Applicants will show that the Proposed Consolidation will, among other things: (a) amend the corporate structure of Met-Ed, Penelec, Penn Power, and West Penn to match their operating structure; (b) align with the FirstEnergy five-state operating model and corresponding changes to FirstEnergy's organizational structure, which are designed to centralize decision-making, lead to greater consistency across the company, and enable FirstEnergy to streamline efforts and make it easier for teams to develop and implement solutions; (c) increase regulatory and administrative benefits by reducing the number of filings and required reports that need to be prepared by Met-Ed, Penelec, Penn Power, and West Penn, submitted to the Commission, and ultimately reviewed by the Commission and other parties; (d) obtain financing benefits on the issuance of new long-term debt through, among other things, more competitive pricing and broadening the base of potential investors; and (e) lay the foundation for an eventual unification of rates and charges for electric service in a subsequent base rate case(s).

20. In addition, the Joint Applicants intend to demonstrate that FE PA (as the surviving entity from the Proposed Consolidation) is technically, financially, and legally fit to commence operations as a public utility. FE PA will continue to provide adequate, safe, and reliable electric service in the service territories of Met-Ed, Penelec, Penn Power, and West Penn. As part of this initiation of service, FE PA plans to adopt and apply the existing tariffs of Met-Ed, Penelec, Penn Power, and West Penn within new service and rate districts of FE PA, which correspond to their

existing service territories, as the Met-Ed Rate District, Penelec Rate District, Penn Power Rate District, West Penn Rate District, and The Pennsylvania State University Rate District. Relatedly, the Joint Applicants intend to demonstrate that the Commission should grant certificates of public convenience authorizing Met-Ed, Penelec, Penn Power, and West Penn to abandon their right and obligation to provide electric service as of the date of closing on the Proposed Consolidation.

21. Furthermore, the Joint Applicants intend to demonstrate that the addition of FE PA Holdco as an intermediate holding company in the chain of ownership of FE PA is necessary or proper for the convenience of the public.

22. Finally, the Joint Applicants intend to demonstrate that that the merger of Met-Ed, Penelec, Penn Power, and West Penn with and into FE PA will not result in anti-competitive or discriminatory conduct in the retail market for electricity in Pennsylvania, nor will it have any adverse effect on the retail electric market in Pennsylvania. 66 Pa.C.S. § 2811(e).

B. PROPOSED SALE OF MAIT CLASS B INTERESTS

23. The Joint Applicants also intend to demonstrate that Met-Ed and Penelec's sale of Class B Membership Interests in MAIT to FirstEnergy should be approved. The Joint Application details the considerable public benefits of the Proposed Sale of MAIT Class B Interests, including that the capital from the sale will be used to lower outstanding debt, make investments into FE PA, and/or lower operations and maintenance costs, which by extension will benefit FE PA and its ratepayers. In addition, this capital will strengthen the credit profile and balance sheet of FE PA.

C. PROPOSED TRANSMISSION CONTRIBUTION

24. The Joint Applicants also intend to demonstrate that the Proposed Transmission Contribution should be approved.

25. The Joint Application details the considerable public benefits of the planned contribution of West Penn's Transmission Assets to KATCo, including: (a) increasing

transparency with respect to West Penn's distribution and transmission businesses; (b) further streamlining the consolidation of electric distribution assets by separating the transmission assets from the only FirstEnergy operating company in Pennsylvania that still owns transmission facilities; (c) leaving FE PA as a more transparent distribution-only company; (d) aligning the structure of West Penn with the structure of the other Pennsylvania OpCos; (e) allowing interested parties to easily review the annual updates to the transmission revenue requirement; (f) providing FERC and the Commission with increased clarity with respect to the business functions each agency regulates; (g) creating a corporate separation of the transmission business; and (h) allowing KATCo to exist with a singular focus on efficiently and effectively operating and maintaining its transmission system.

26. In addition, the Joint Applicants intend to demonstrate that KATCo is technically, financially, and legally fit to provide electric transmission service in Pennsylvania, because KATCo will: (1) be a member of FirstEnergy's holding company system and have access to the resources and expertise available from FirstEnergy; (2) be a member of FirstEnergy's regulated money pool and have access to short-term and long-term financing; and (3) continue the operation of West Penn's transmission facilities in a safe and legal manner.

D. AFFILIATED INTEREST AGREEMENTS

27. Finally, the Joint Application requests Commission approval of various affiliated interest agreements, including: (1) the Agreements and Plans of Merger; (2) the Capital Contribution Agreement; (3) the West Penn Ground Lease; (4) the FirstEnergy Service Agreement; (5) the Revised Amended and Restated Mutual Assistance Agreement; (6) the Share Purchase Agreement between KATCo and FirstEnergy; (7) agreements and documents related to the disposition of the MAIT Class B membership interests; (8) the Third Revised and Restated Money Pool Agreement; and (9) the Form of Joinder Agreement that FirstEnergy will sign to be

joined as a party to the Limited Liability Company Agreement of MAIT, in its capacity as a Class B shareholder. *See* 66 Pa.C.S. § 2102.

28. The Joint Applicants intend to show that the proposed affiliated interest agreements are reasonable and in the public interest and should be approved pursuant to Section 2102 of the Code because they are necessary to complete the Transaction. In turn, the Transaction is in the public interest for the reasons set forth above regarding the Proposed Consolidation, the Proposed Sale of MAIT Class B Interests, and the Proposed Transmission Contribution. The Joint Application also sets forth in detail the public benefits of the proposed Transaction.

29. The Joint Applicants reserve the right to raise and/or address additional issues that may arise during the course of the proceeding.

IV. WITNESSES

30. The Joint Applicants presently intend to offer the following witnesses to testify in this proceeding on the following subject matters:

Statement No.	Witness	Subjects Addressed
1.	Joanne M. Savage Director of the Rates and Regulatory Affairs Department - Pennsylvania FirstEnergy Service Company 2800 Pottsville Pike Reading, PA 19605	Overview of the Transaction Benefits of the Proposed Transaction Impact on Customers, Employees, and the Competitive Marketplace
2.	Amy S. Patterson Manager of the Property Accounting Department FirstEnergy Service Company 76 South Main Street Akron, OH 44308	Accounting Implications of the Transaction Tracking of Transaction-Related Costs Accounting Benefits of the Proposed Transaction Affiliated Interest Agreements

3.	Ermal Fatusha Director of Capital Markets, Corporate Treasury Department FirstEnergy Service Company 76 South Main Street Akron, OH 44308	Financial/Long-Term Planning
4.	Sally A. Thomas Director of Transmission Planning & Protection FirstEnergy Service Company 76 South Main Street Akron, OH 44308	Contribution of West Penn Assets to KATCo KATCo Transmission Operations

31. The Joint Applicants also reserve the right to call and present additional witnesses to address any issues that may arise during the course of the proceeding.

V. DISCOVERY

32. The Joint Applicants have received discovery requests and are in the process of timely responding to those requests.

33. The Joint Applicants do not believe that any modifications to the standard timelines for discovery set forth in the Commission’s regulations are necessary or appropriate at this time. The Joint Applicants are willing to discuss reasonable modifications to the standard timelines for discovery set forth in the Commission’s regulations.

34. Finally, the Joint Applicants propose the use of electronic service of discovery responses. Specifically, the Joint Applicants propose to post all discovery responses to a Microsoft OneDrive site operated by Post & Schell, P.C. The Joint Applicants will file and serve a letter notifying the parties when the applicable discovery responses have been posted to the OneDrive site. Once posted, parties will be able to access, review, download, and/or print the discovery responses as needed.

VI. LITIGATION SCHEDULE

35. The Joint Applicants propose that the following schedule, such that the

Commission may grant the authorizations sought at the December 2023 public meeting date:

Joint Application Filed	March 6, 2023
Pa. Bulletin Publication	March 18, 2023
Prehearing Conference	April 25, 2023
Intervenors' Direct Testimony	June 15, 2023
Rebuttal Testimony	July 14, 2023
Surrebuttal Testimony	August 1, 2023
Oral Rejoinder and Hearings	August 8-9, 2023
Main Briefs	August 30, 2023
Reply Briefs	September 15, 2023

The Joint Applicants set forth an initially proposed schedule in Section XV of the Joint Application. Since the filing of the Joint Application, the Joint Applicants have discussed the proposed schedule with the parties that have intervened or petitioned to intervene in this matter, and the parties have mutually agreed upon the schedule set forth above, subject to Your Honors' availability for hearings. The Joint Applicants are willing to work to accommodate potential scheduling conflicts for other parties' witnesses to attend and testify at the evidentiary hearings.

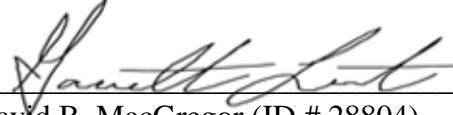
VII. SETTLEMENT

36. As of this time, no settlement discussions have been held. The Joint Applicants remain open and available for settlement discussions and would support initiatives to begin settlement discussions at the earliest possible date.

Tori L. Giesler (ID # 207742)
Darshana Singh (ID # 330971)
FirstEnergy Service Company
2800 Pottsville Pike
P.O. Box 16001
Reading, PA 19612-6001
Phone: 610-921-6658
E-mail: tgiesler@firstenergycorp.com
Email: singhd@firstenergycorp.com

Dated: April 21, 2023

Respectfully submitted,



David B. MacGregor (ID # 28804)
Devin T. Ryan (ID # 316602)
Garrett P. Lent (ID # 321566)
Megan E. Rulli (ID # 331981)
Post & Schell, P.C.
17 North Second Street
12th Floor
Harrisburg, PA 17101-1601
Phone: 717-731-1970
Fax: 717-731-1985
E-mail: dmacgregor@postschell.com
E-mail: dryan@postschell.com
E-mail: glent@postschell.com
E-mail: mrulli@postschell.com

*Attorneys for 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*