

COMMONWEALTH OF PENNSYLVANIA



PATRICK M. CICERO
Consumer Advocate

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April 26, 2023

Via Electronic Mail Only

Tori L. Giesler, Esquire
Darshana Singh, Esquire
FirstEnergy Service Company
2800 Pottsville Pike
P.O. Box 16001
Reading, PA 19612-6001
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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 for All of the Necessary Authority, Approvals, and Certificates of Public Convenience for (1) the Agreements and Plans of Merger Docket Nos. A-2023-3038771 et. al.

Dear Counsel:

Enclosed you will find Interrogatories of the Office of Consumer Advocate, Set 1 and Set 2 in the above-referenced proceedings.

In accordance with the discovery modifications ordered during the prehearing conference on April 25, 2023, we request that the Company provide verified answers to these inquiries within ten (10) days of service. Also, please forward the verified answers as they are completed, rather than waiting until the responses to the full set are completed. We would appreciate it if you would communicate any objections you may have to these interrogatories as soon as possible.

We also request that you send a copy of the answers directly to our group e-mail, as listed below:

E-Mail: OCAFEMerger2023@paoca.org

Tori L. Giesler, Esquire
Darshana Singh, Esquire
April 26, 2023
Page 2

If you have any questions, please call us. By copy of this letter, copies of these interrogatories have been served upon all parties. A certificate of service showing service of these interrogatories on all parties has been filed with Secretary Chiavetta of the Pennsylvania Public Utility Commission as required by 52 Pa. Code §5.341(b).

Sincerely,

/s/ Andrew J. Zerby
Andrew J. Zerby
Assistant Consumer Advocate
PA Attorney I.D. # 332222
E-Mail: AZerby@paoca.org

Enclosures:

cc: PUC Secretary Rosemary Chiavetta, (Letter and Certificate of Service Only)
Certificate of Service

*344923

CERTIFICATE OF SERVICE

Joint Application of Metropolitan Edison : Docket Nos. A-2023-3038771 et.al
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 :
:

I hereby certify that I have this day served a true copy of the following document, the Office of Consumer Advocate’s Interrogatories to Metropolitan Edison Company, Pennsylvania Electric Company, Pennsylvania Power Company and West Penn Power Company, Set 1 and Set 2, upon parties of record in this proceeding in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant), in the manner and upon the persons listed below:

Dated this 26th day of April 2023.

SERVICE BY E-MAIL ONLY

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Dated: April 26, 2023
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