

COMMONWEALTH OF PENNSYLVANIA



PATRICK M. CICERO
Consumer Advocate

OFFICE OF CONSUMER ADVOCATE
555 Walnut Street, 5th Floor, Forum Place
Harrisburg, Pennsylvania 17101-1923
(717) 783-5048
(800) 684-6560

 @pa_oca
 /pennoca
FAX (717) 783-7152
consumer@paoca.org
www.oca.pa.gov

July 6, 2023

Via Electronic Mail Only

David B. MacGregor, Esquire
Devin T. Ryan, Esquire
Garrett P. Lent, Esquire
Megan E. Rulli, Esquire
Post & Schell, P.C.

17 North Second Street, 12th Floor
Harrisburg, PA 17101-1601
dmacgregor@postschell.com
dryan@postschell.com
glent@postschell.com
mrulli@postschell.com

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 please find the Office of Consumer Advocate's Responses to 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 (collectively, "Joint Applicants") Interrogatories, Set II, in the above-referenced proceeding.

David B. MacGregor, Esquire
Devin T. Ryan, Esquire
Garrett P. Lent, Esquire
Megan E. Rulli, Esquire
July 6, 2023
Page 2

Copies of the responses have been served as indicated on the enclosed Certificate of Service.

Respectfully submitted,

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

Enclosures:

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

*348344

CERTIFICATE OF SERVICE

Joint Application of Metropolitan Edison :
Company, Pennsylvania Electric Company, :
Pennsylvania Power Company, West Penn :
Power Company, Keystone Appalachian :
Transmission Company, Mid-Atlantic : Docket No. A-2023-3038771 et.al
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 Responses to the “Joint Applicants”, Set II, 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 6th day of July 2023.

SERVICE BY E-MAIL ONLY

Scott B. Granger, Esquire
Bureau of Investigation & Enforcement
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor
Harrisburg, PA 17120
sgranger@pa.gov
Counsel for I&E

Sharon E. Webb, Esquire
Office of Small Business Advocate
555 Walnut Street
1st Floor, Forum Place
Harrisburg, PA 17101-1923
swebb@pa.gov
Counsel for OSBA

Tori L. Giesler, Esquire
Darshana Singh, Esquire
FirstEnergy Service Company
2800 Pottsville Pike
P.O. Box 16001
Reading, PA 19612-6001
tgiesler@firstenergycorp.com
singhd@firstenergycorp.com
*Counsel for FirstEnergy Companies,
KATCO, MAIT, LLC, &
FirstEnergy PA Electric Company*

David B. MacGregor, Esquire
Devin T. Ryan, Esquire
Garrett P. Lent, Esquire
Megan E. Rulli, Esquire
Post & Schell, P.C.
17 North Second Street, 12th Floor
Harrisburg, PA 17101-1601
dmacgregor@postschell.com
dryan@postschell.com
glent@postschell.com
mrulli@postschell.com
*Counsel for FirstEnergy Companies,
KATCO, MAIT, LLC, & FirstEnergy PA
Electric Company*

SERVICE BY E-MAIL ONLY (continued)

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

Susan E. Bruce, Esquire
Charis Mincavage, Esquire
McNees Wallace & Nurick LLC
100 Pine Street
P.O. Box 1166
Harrisburg, PA 17108-1166
sbruce@mcneeslaw.com
cmincavage@mcneeslaw.com
Counsel for "Industrial Customer Groups"

Deanne M. O'Dell, Esquire
Karen O. Moury, Esquire
Eckert Seamans Cherin & Mellott, LLC
213 Market Street, 8th Floor
P.O. Box 1248
Harrisburg, PA 17101
dodell@eckertseamans.com
kmoury@eckertseamans.com
Counsel for "RESA"

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

Aron J. Beatty
Senior Assistant Consumer Advocate
PA Attorney I.D. # 86625
ABeatty@paoca.org

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 18101
jlushis@norris-law.com
dberger@norris-law.com
Counsel for Calpine Retail Holdings, LLC

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

Christy M. Appleby
Senior Assistant Consumer Advocate
PA Attorney I.D. # 85824
CAAppleby@paoca.org

Counsel for:
Office of Consumer Advocate
555 Walnut Street
5th Floor, Forum Place
Harrisburg, PA 17101-1923
Phone: (717) 783-5048
Dated: July 6, 2023
*348343