

March 12, 2024

Via Electronic Filing

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

**Re: Docket No. C-2023-3041788
Melinda Brown v. Metropolitan Edison Company
Response of Met-Ed to documents provided by Complainant**

Dear Secretary Chiavetta:

Pursuant to the Order issued February 14, 2024, attached for filing is the response of Metropolitan Edison Company to the documents provided by Melinda Brown (Complainant).

A copy of the enclosed response has been provided to the Complainant 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
Enclosures

cc: The Hon. Darlene Heep, PA Public Utility Commission [w/encls.]
Tori Giesler, Esquire, FirstEnergy Service Company [w/encls.]
Melinda Brown [w/encls.]

**Re: Docket No. C-2023-3041788
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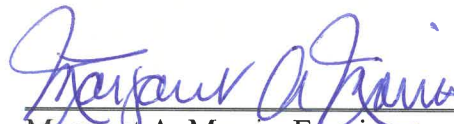
CERTIFICATE OF SERVICE

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 and First-Class Mail

Melinda Brown
P.O. Box 204
Mohnton, PA 19540
grump-2@hotmail.com

Dated: March 12, 2024


Margaret A. Morris, Esquire

March 12, 2024

Via Electronic Mail

The Honorable Darlene Heep
c/o sdelvillar@pa.gov

**Re: Docket No. C-2023-3041788
Melinda Brown v. Metropolitan Edison Company
Response of Met-Ed to documents provided by Complainant**

Dear Judge Heep:

Pursuant to the Order, dated February 14, 2024, please accept the below response of Metropolitan Edison Company (Met-Ed) to the email sent by Mr. Doug Adams on March 4, 2024 at 10:52 PM.

Summary of Comments

Mr. Adams alleges that Med-Ed contacted LIHEAP and interfered with the LIHEAP Crisis Grant, in the amount of \$634.61. A representative of LIHEAP (See Exhibit 13) advised that the Account was not eligible for a Crisis grant due to the fact that there was no pending termination notice. The Commission ordered a COVID Moratorium of Terminations for the period March 13, 2020 through September 30, 2021. As a result, there was no pending termination notice as had been reported to LIHEAP. Two Delinquency Notices were issued: July 13, 2020 (Exhibit 11) and September 14, 2020 (Exhibit 12).

Below is the response to the language in the email.

2/21/24 draft

The original complaint was about not getting a credit for a payment from lihep. After the recorded call with Ms. Morris I was promised this would be credited if I dropped the complaint. Obviously this was not true triggering a second complaint. After investigating it we found that Met ed refused the payment citing no back due amount, than reapplied without our knowledge under our names. This payment has disappeared. All of this is in some of the timelines supplied by Met ed and Ms. Morris. Since multiple versions of this time line have already been admitted into evidence it is easy to prove what happened and both parties have been working to cover it up. Attached is your evidence that is relevant and the information we have received. As I am sure you are aware these are not just civil complaints and if needed we are more than happy to assist the state with a criminal case. If you would like to discuss this we can be available between 9am and 2pm est any weekday.

The Hon. Darlene Heep
Re: Response of Met-Ed
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Met-Ed Response:

- The 2022 Formal Complaint filed by Mr. Adams did not raise the issue of a missing LIHEAP payment. (See Exhibits 4, 5, and 8). The Settlement Letter for the 2022 Formal details that Mr. Adams no longer wished to pursue the matter (Exhibit 7).
- Met-Ed's automated outbound calling system reached out on 2/15/22 requesting permission to apply for LIHEAP on the customer's behalf. The customer selected the option to decline, so Met-Ed did not pursue funding from LIHEAP on Ms. Brown's behalf.
- All payments have posted and no information or documentation has been presented reflecting a missing payment/grant.

3/4/24

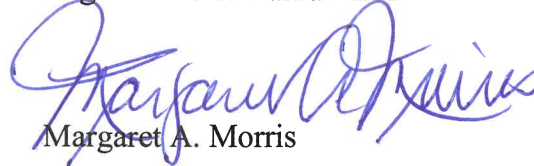
After speaking with the investigator at the welfare office It turns out that after my original call with Ms. Morris, almost 2 months after payment was sent, someone claiming to be a representative of Met Ed contacted them and had the payment reversed citing there was no back due amount. So this nullifies the back due amount of \$1100. This also contradicts evidence supplied by Ms. Morris. With this information I don't see a way around bringing criminal charges. If you feel you have another option we can be available between 9am and 2pm est any weekday.

Met-Ed Response:

- The Commission ordered a COVID Moratorium of Terminations for the period March 13, 2020 through September 30, 2021.
- As a result, there was no pending termination notice as had been reported to LIHEAP. Two Delinquency Notices were issued: July 13, 2020 (Exhibit 11) and September 14, 2020 (Exhibit 12).
- As stated in the Status Report, dated October 23, 2023, Met-Ed contacted LIHEAP who stated that based on its record as of 10/5/22, "the customer only received LIHEAP Cash for \$1,0000 and a supplement of \$150.00. There was no Crisis grant."

Very truly yours,

Reger Rizzo & Darnall LLP



Margaret A. Morris

MAM/mam
Enclosures

cc: Tori Giesler, Esquire, FirstEnergy Service Company [w/encls.]
Melinda Brown [w/encls.]