
Devin Ryan

dryan@postschell.com
717-612-6052 Direct
717-731-1985 Direct Fax
File #: 196522

May 20, 2024

VIA ELECTRONIC FILING

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

Re: Application of FirstEnergy Pennsylvania Electric Company, Under Sections 507, 1102(a)(1), and 1102(a)(3) of the Public Utility Code, for All of the Necessary Authority, Approvals and Certificates of Public Convenience for: (1) the Acquisition of Certain Electric Distribution Facilities from the Letterkenny Industrial Development Authority; (2) FirstEnergy Pennsylvania Electric Company's Right to Initiate and Provide Electric Distribution Service in the Portions of Letterkenny, Greene, and Hamilton Townships, Franklin County, Pennsylvania Currently Served by the Letterkenny Industrial Development Authority; and (3) Any Other Approvals Necessary to Complete the Contemplated Transaction
Docket No. A-2023-3043428

Dear Secretary Chiavetta:

Attached for filing please find the Responses of FirstEnergy Pennsylvania Electric Company ("FE PA") to the Data Requests, Set II, of the Bureau of Technical Utility Services in the above-captioned proceeding.

Copies of this filing are being served as indicated below and on the Certificate of Service.

Respectfully submitted,



Devin Ryan

DTR/dmc

Rosemary Chiavetta
May 20, 2024
Page 2

Attachments

cc: Jordan Van Order (*via email; w/attachments*)
Certificate of Service

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of this filing has been served upon the following:

VIA EMAIL ONLY

Steven C. Gray, Esquire
Rebecca Lyttle, Esquire
Office of Small Business Advocate
Forum Place
555 Walnut Street, 1st Floor
Harrisburg, PA 17101
sgray@pa.gov
relyttle@pa.gov

Melanie El Atieh, Esquire
Office of Consumer Advocate
555 Walnut Street, 5th Floor
Harrisburg, PA 17101
melatieh@paoca.org

Susan E. Bruce, Esquire
Kenneth R. Stark, Esquire
Adeolu A. Bakare, Esquire
McNees Wallace & Nurick LLC
100 Pine Street
P.O. Box 1166
Harrisburg, PA 17108-1166
sbruce@mcneeslaw.com
kstark@mcneeslaw.com
abakare@mcneeslaw.com
*Counsel for Letterkenny Industrial
Development Authority*

Mark Ewen
Industrial Economics Incorporated
2067 Massachusetts Avenue
Cambridge, MA 02140
mewen@indecon.com

Date: May 20, 2024



Devin T. Ryan, Esquire

Bureau of Technical Utility Services
Data Requests
Docket No. A-2023-3043428

A-5 Reference TUS Data Requests, Response to A-2. Please describe the condition of the LIDA distribution system.

Response:

FirstEnergy Pennsylvania Electric Company (“FE PA”), through its predecessor operating company West Penn Power, has maintained the Letterkenny Industrial Development Authority (“LIDA”) electric distribution system (“EDS”) for the past 25 years and has worked with LIDA to resolve any known maintenance issues throughout this timeframe. Accordingly, the LIDA EDS has been maintained in accordance with FirstEnergy Corp’s company standards. The condition of the LIDA EDS is equivalent to that of the other distribution systems that make up FE PA with no major issues identified at this time.

Sponsored by David Young.

Bureau of Technical Utility Services
Data Requests
Docket No. A-2023-3043428

A-6: Reference the Application, paragraph 57. Please explain how FE PA will finance any necessary improvements to the LIDA system.

Response:

FE PA finances its capital expenditures, including necessary improvements to its electric distribution systems, with a mixture of long-term debt and equity consistent with FE PA's allowed capital structure.

Sponsored by David Young.

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Application of FirstEnergy Pennsylvania :
Electric Company, Under Sections 507, : **DOCKET NOS. A-2023-3043428**
1102(a)(1), and 1102(a)(3) of the Public :
Utility Code, for All of the Necessary :
Authority, Approvals and Certificates of :
Public Convenience for: (1) the Acquisition of :
Certain Electric Distribution Facilities from :
the Letterkenny Industrial Development :
Authority; (2) West Penn Power Company’s :
Right to Initiate and Provide Electric :
Distribution Service in the Portions of :
Letterkenny, Greene, and Hamilton :
Townships, Franklin County, Pennsylvania :
Currently Served by the Letterkenny :
Industrial Development Authority; and (3) :
Any Other Approvals Necessary to Complete :
the Contemplated Transaction. :

VERIFICATION

I, David M. Young, hereby state that the facts set forth above are true and correct to the best of my knowledge, information and belief and that I expect FirstEnergy Pennsylvania Electric Company to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa.C.S. § 4904.

5/20/2024

Date

David M. Young

David M. Young