

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

May 29, 2024

**Via Electronic Mail Only**

David B. MacGregor, Esquire  
Garrett P. Lent, Esquire  
Nicholas A. Stobbe, Esquire  
Post & Schell, P.C.  
17 North Second Street, 12<sup>th</sup> Floor  
Harrisburg, PA 17101-1601  
dmacgregor@postschell.com  
glent@postschell.com  
nstobbe@postschell.com

Re: Pennsylvania Public Utility Commission  
v.  
FirstEnergy Pennsylvania Electric Company  
Docket No. R-2024-3047068

Dear Counsel:

Enclosed you will find Interrogatories of the Office of Consumer Advocate, Set 14, in this matter.

In accordance with the discovery modifications ordered at the Prehearing Conference held on May 2, 2024, we request FirstEnergy Pennsylvania Electric 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:

OCAFirstEnergy2024@paoca.org

David B. MacGregor, Esquire  
Garrett P. Lent, Esquire  
Nicholas A. Stobbe, Esquire  
May 29, 2024  
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,

  
Andrew 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

CERTIFICATE OF SERVICE

Pennsylvania Public Utility Commission :
v. : Docket No. R-2024-3047068
FirstEnergy Pennsylvania Electric Company :

I hereby certify that I have this day filed electronically on the Commission’s electronic filing system and served a true copy of the following document, the Office of Consumer Advocate’s Interrogatories to FirstEnergy Pennsylvania Electric Company, Set 14, 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 29th day of May 2024.

SERVICE BY E-MAIL ONLY

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

Tori L. Giesler, Esquire
Darshana Singh, Esquire
Angelina M. Umstead, Esquire
FirstEnergy Service Company
76 South Main
Akron, OH 44308
tgiesler@firstenergycorp.com
singhd@firstenergycorp.com
aumstead@firstenergycorp.com
Counsel for FE PA

Devin T. Ryan, Esquire
Post & Schell, P.C.
One Oxford Centre
301 Grant Street, Suite 3010
Pittsburgh, PA 15219
dryan@postschell.com
Counsel for FE PA

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

David B. MacGregor, Esquire
Garrett P. Lent, Esquire
Nicholas A. Stobbe, Esquire
Post & Schell, P.C.
17 North Second Street, 12th Floor
Harrisburg, PA 17101-1601
dmacgregor@postschell.com
glent@postschell.com
nstobbe@postschell.com
Counsel for FE PA

Ria M. Pereira, Esq.
Elizabeth R. Marx, Esq.
John W. Sweet, Esq.
Lauren N. Berman, Esq.
118 Locust Street
Harrisburg, PA 17101
pulp@pautilitylawproject.org
Counsel for CAUSE-PA

SERVICE BY E-MAIL ONLY

Susan E. Bruce, Esq.  
Charis Mincavage, Esq.  
Kenneth R. Stark, Esq.  
Harrison Ryan Block, Esq.  
McNEES WALLACE & NURICK LLC  
100 Pine Street  
P.O. Box 1166  
Harrisburg, PA 17108-1166  
sbruce@mcneeslaw.com  
cmincavage@mcneeslaw.com  
kstark@mcneeslaw.com  
rblock@mcneeslaw.com  
*Counsel for MEIUG, PICA, and WPPH*

Annete Martin  
3350 White Church Road  
Chambersburg PA, 17202  
g15a20@yahoo.com

Donald Ellenberger  
206 Huch Farm Road  
Mars PA, 16046  
dmrjj724@gmail.com

Brian T. Kadlubek, Esq.  
Pullman Center  
112 Hollywood Drive, Suite 101  
Butler, PA 16001  
btkadlubek@lawgol.com  
*Counsel for IBEW*

Derrick Price Williamson  
Barry A. Naum  
Steven W. Lee  
SPILMAN THOMAS & BATTLE, PLLC  
1100 Bent Creek Boulevard, Suite 101  
Mechanicsburg, PA 17050  
dwilliamson@spilmanlaw.com  
bnaum@spilmanlaw.com  
slee@spilmanlaw.com  
*Counsel for Walmart Inc.*



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

Darryl Lawrence  
Senior Assistant Consumer Advocate  
Harrison Breitman  
Emily A. Farren  
Assistant Consumer Advocates  
OCAFirstEnergy2024@paoca.org

*Counsel for:*  
Office of Consumer Advocate  
555 Walnut Street  
5th Floor, Forum Place  
Harrisburg, PA 17101-1923  
717-783-5048

Dated: May 29, 2024