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File #: 202658

August 19, 2024

***VIA ELECTRONIC FILING***

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

**Re: Pennsylvania Public Utility Commission *et al.* v. FirstEnergy Pennsylvania Electric Company**  
**Docket Nos. R-2024-3047068, *et al.***

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Dear Secretary Chiavetta:

Attached for filing is the Joint Stipulation for Admission of Evidence on behalf of FirstEnergy Pennsylvania Electric Company in the above referenced proceeding. Copies will be provided as indicated on the Certificate of Service.

Respectfully submitted,



Nicholas A. Stobbe

NAS/dmc  
Attachments

cc: The Honorable Katrina L. Dunderdale (*via email; w/attachments*)  
Emily I. DeVoe (*via email; w/attachments*)  
Certificate of Service

## CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been served upon the following persons, in the manner indicated, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

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Date: August 19, 2024



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Nicholas A. Stobbe

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission, <i>et al.</i>	:	
	:	
v.	:	Docket Nos. R-2024-3047068, <i>et al.</i>
	:	
FirstEnergy Pennsylvania Electric Company	:	
	:	

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**JOINT STIPULATION FOR ADMISSION OF EVIDENCE**

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**TO ADMINISTRATIVE LAW JUDGES KATRINA L. DUNDERDALE AND EMILY DEVOE:**

FirstEnergy Pennsylvania Electric Company (“FE PA” or the “Company”), the Bureau of Investigation and Enforcement (“I&E”) of the Pennsylvania Public Utility Commission (“Commission”), the Office of Consumer Advocate (“OCA”), the Office of Small Business Advocate (“OSBA”), the Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania (“CAUSE-PA”), the Met-Ed Industrial Users Group (“MEIUG”), Penelec Industrial Customer Alliance (“PICA”), and West Penn Power Industrial Interveners (“WPPII”) (collectively “Large User Groups”), the International Brotherhood of Electric Workers Local 459 (“IBEW 459”), the Local Union 777 of the International Brotherhood of Electrical Workers, AFL-CIO (“IBEW Local 777”), the UWUA System Local 102 (“UWUA 102”), Walmart, Inc. (“Walmart”) and the Pennsylvania State University (“PSU”), parties in the above-captioned proceeding (hereinafter collectively referred to as the “Joint Petitioners” or “Parties”), hereby submit this Joint Stipulation for Admission of Evidence (the “Evidence Stipulation”). In support of the Evidence Stipulation, the Joint Petitioners represent as follows:

## **I. INTRODUCTION AND BACKGROUND**

1. On April 2, 2024, FE PA filed with the Commission its 2024 Base Rate Case Filing (“Filing”), which consisted of Supplement No. 3 to FE PA’s Tariff Electric – Pa. P.U.C. No. 1 (“Supplement No. 3”), responses to filing requirements and standard data requests, and supporting direct testimony and exhibits. In Supplement No. 3, FE PA sought a base rate increase, pursuant to 66 Pa.C.S. § 1308 of the Public Utility Code (“Code”), of approximately \$502 million annually across all “Rate Districts” based on data for a fully projected future test year ending December 31, 2025. On a Rate District basis, FE PA proposed rates designed to increase annual distribution revenues as follows: Met-Ed Rate District - \$146 million, Penelec Rate District - \$132 million, Penn Power Rate District - \$55 million, and West Penn Rate District - \$169 million. Supplement No. 3 also contained non-substantive revisions to the language of certain Rules and Regulations, rate schedules and riders in the Company’s currently effective tariff, as summarized in FE PA Exhibit MSK-2.

2. On April 9, 2024, I&E filed a Notice of Appearance.

3. On April 10, 2024, FE PA was served with the Formal Complaint and Public Statement filed by OCA at Docket No. C-2024-3048327.

4. On April 15, 2024, OSBA entered its Notice of Appearance.

5. On April 16, 2024, CAUSE-PA filed a Petition to Intervene and Answer.

6. On April 17, 2024, OCA filed a Notice of Appearance.

7. On April 24, 2024, the Large User Groups filed a Joint Complaint.

8. On April 25, 2024, Administrative Law Judge (“ALJ”) Katrina Dunderdale issued a Prehearing Order.

9. Also on April 25, 2024, IBEW 459 filed a Petition to Intervene. Further, the Commission entered an Order on April 25, 2024, instituting an investigation into the lawfulness,

justness, and reasonableness of the rates, rules and regulations contained the proposed Supplement No. 3. The April 25, 2024 Order also suspended proposed Supplement No. 3 until January 1, 2025, unless otherwise directed by Order of the Commission, and assigned the case to the Commission's Office of ALJ.

10. On April 30, 2024, IBEW Local 777 filed a Petition to Intervene.

11. On May 1, 2024, various parties filed Prehearing Memorandums.

12. On May 2, 2024, Walmart filed a Petition to Intervene.

13. On or around May 24, 2024, UWUA 102 filed a Complaint.

14. On June 25, 2024, various parties filed Direct Testimony and associated exhibits.

15. On June 27, 2024, FE PA filed Supplement No. 9 to Tariff Electric PA. P.U.C. No.

1.

16. On July 22, 2024, FE PA and various other parties filed Rebuttal Testimony and associated exhibits.

17. On August 1, 2024, UWUA 102 and OCA filed a Notice of Appearance.

18. On August 5, 2024, ALJ Dunderdale and ALJ DeVoe (the "ALJs") issued a Telephonic Evidentiary Hearings Notice.

19. On August 8, 2024, FE PA and various other parties filed Surrebuttal Testimony and associated exhibits.

20. On August 15, 2024, the Parties participated in a telephonic Evidentiary Hearing, as scheduled. During that discussion, the parties advised the ALJs that a near Settlement had been reached with respect to the Company's revenue requirement and requested that the August 16, 2024, Evidentiary Hearing be cancelled to accommodate further settlement discussions. The Parties agreed that the scheduled Evidentiary Hearing on August 19, 2024, would convene for the

purposes of limited cross-examination of certain witnesses and to proffer certain additional testimony at the request of the ALJs. The ALJs also permitted the Parties to admit certain of their respective pieces of testimony and evidence be admitted through written stipulation. Also on August 15, 2024, FE PA filed a Motion for Protective Order. Later that day, the ALJs issued a Protective Order.

21. The Joint Petitioners request that the ALJs admit the testimony and the exhibits listed below into the record in the above-captioned proceeding:

## **II. JOINT STIPULATION**

### **(A) FE PA Initial Filing**

#### **22. Volume I**

- Index
- Index of Direct Testimony and Exhibits
- FE PA Exhibit No. 1 – Proposed Tariff (Clean)
- Statement of Reasons
  - I. General Filing Information
  - II. Primary Statement of Rate Base & Operating Income
  - III. Rate of Return
  - IV. Rate Structure & Cost Allocation
  - V. Plant & Depreciation Supporting Data
  - VI. Unadjusted Comparative Balance Sheets & Operating Statements
- USB Flash Drive of Filing

#### **23. Volume II**

- FE PA Statement No. 1 – Direct Testimony of Joanne M. Savage
  - FE PA Exhibits JMS-1 through JMS-4 (**JMS-4 no public version**)
- FE PA Statement No. 2 – Direct Testimony of Wade Smith
- FE PA Statement No. 3 – Direct Testimony of Patricia Larkin
  - FE PA Exhibits PLM-1 through PML-6
- FE PA Statement No. 4 – Direct Testimony of Tracy Ashton
  - FE PA Exhibits TMA-1 through TMA-3
- FE PA Statement No. 5 – Direct Testimony of Gregory Gawlik
  - FE PA Exhibits GJG-1 and GJG-2 (**no public versions**)
- FE PA Statement No. 6 – Direct Testimony of Mark Kehl
  - FE PA Exhibits MSK-1 through MSK-4

24. **Volume III**

- FE PA Statement No. 7 – Direct Testimony of Timothy Lyons
  - FE PA Exhibits TSL-1 through TSL-5
- FE PA Statement No. 8 – Direct Testimony of Mark Jones and Errata filed to Direct Testimony on August 19, 2024
  - FE PA Exhibit MAJ-1
- FE PA Statement No. 10 – Direct Testimony of Dylan D’Ascendis
  - FE PA Exhibits DWD-1 through DWD-9
- FE PA Statement No. 11 – Direct Testimony of Bill Wang
  - FE PA Exhibits BW-1 through BW-3

25. **Volume IV**

- FE PA Statement No. 9 – Direct Testimony of John Spanos
  - FE PA Exhibits JJS-1 through JJS-16

26. **Volume V – CONFIDENTIAL AND HIGHLY CONFIDENTIAL INFORMATION**

- II-D-17 Attachment A (**Confidential**)
- II-D-21 Attachment A (**Confidential**)
- II-D-23 Attachment A (**Confidential**)
- II-D-23 Attachment B (**Confidential**)
- II-D-24 Attachment A (2023) (**Confidential**)
- II-D-24 Attachment B (2024) (**Confidential**)
- II-D-24 Attachment C (2025) (**Confidential**)
- FE PA Exhibit JMS-4 (**Highly Confidential**)
- FE PA Exhibit GJG-1 (**Confidential**)
- FE PA Exhibit GJG-2 (**Confidential**)

(B) **FE PA Rebuttal Testimony and Exhibits**

27. FE PA Statement No. 1-R – Rebuttal Testimony of Joanne M. Savage
- FE PA Exhibit JMS-5
28. FE PA Statement No. 2-R – Rebuttal Testimony of Wade Smith
29. FE PA Statement No. 3-R – Rebuttal Testimony of Patricia M. Larkin (**CONFIDENTIAL** and PUBLIC versions)
- FE PA Exhibits PML-7 (**CONFIDENTIAL** and PUBLIC versions), PML-8
30. FE PA Statement No. 4-R – Rebuttal Testimony of Tracy Ashton

- FE PA Exhibits TMA-4 and TMA-5
31. FE PA Statement No. 5-R – Rebuttal Testimony of Gregory Gawlik
    - FE PA Exhibits GJG-3 (**CONFIDENTIAL** version only)
  32. FE PA Statement No. 6-R – Rebuttal Testimony of Mark S. Kehl
    - FE PA Exhibits MSK-5 and MSK-6
  33. FE PA Statement No. 7-R – Rebuttal Testimony of Timothy Lyons and Errata filed to Rebuttal Testimony on August 19, 2024
    - FE PA Exhibits TSL-R1 and TSL-R2
  34. FE PA Statement No. 8-R – Rebuttal Testimony of Mark A. Jones
    - FE PA Exhibits MAJ-2 through MAJ-5
  35. FE PA Statement No. 9-R – Rebuttal Testimony of John J. Spanos
    - FE PA Exhibits JJS-17 and JJS-18
  36. FE PA Statement No. 10-R – Rebuttal Testimony of Dylan D’Ascendis
    - FE PA Exhibits DWD-1R through DWD-17R
  37. FE PA Statement No. 11-R – Rebuttal Testimony of Bill Wang
  38. FE PA Statement No. 12-R – Rebuttal Testimony of John Hawkins
  39. FE PA Statement No. 13-R – Rebuttal Testimony of April Marx
  40. FE PA Statement No. 14-R – Rebuttal Testimony of Jason De Stigter

**(C) FE PA Surrebuttal Testimony and Exhibits**

41. FE PA Statement No. 8-SR – Surrebuttal Testimony of Mark Jones
42. FE PA Statement No. 12-SR – Surrebuttal Testimony of John Hawkins
43. FE PA Statement No. 13-SR – Surrebuttal Testimony of April Marx

**(D) I&E Direct Testimony and Exhibits**

44. I&E Statement No. 1 - Direct Testimony of Vanessa Okum (PROPRIETARY/Non-Proprietary)

- I&E Exhibit No. 1 (PROPRIETARY/Non-Proprietary)

45. I&E Statement No. 2 – Direct Testimony of D.C. Patel

- I&E Exhibit No. 2

46. I&E Statement No. 3 – Direct Testimony of Joseph Kubas (PROPRIETARY/Non-Proprietary)

- I&E Exhibit No. 3

47. I&E Statement No. 4 – Direct Testimony of Christine Wilson

- I&E Exhibit No. 3

**(E) I&E Rebuttal Testimony and Exhibits**

48. I&E Statement No. 1-R – Rebuttal Testimony of Vanessa Okum (PROPRIETARY/Non-Proprietary)

- I&E Exhibit No. 1-R

49. I&E Statement No. 4-R – Rebuttal Testimony of Christine Wilson

**(F) I&E Surrebuttal Testimony and Exhibits**

50. I&E Statement No. 1-SR – Surrebuttal Testimony of Vanessa Okum (PROPRIETARY/Non-Proprietary)

- I&E Exhibit No. 1-SR

51. I&E Statement No. 2-SR – Surrebuttal Testimony of D.C. Patel

52. I&E Statement No. 3-SR – Surrebuttal Testimony of Joseph Kubas (PROPRIETARY/Non-Proprietary)

- I&E Exhibit No. 3-SR

53. I&E Statement No. 4-SR – Surrebuttal Testimony of Christine Wilson

**(G) OCA Direct Testimony and Exhibits, with all Verifications Attached**

54. OCA Statement No. 1 – Direct Testimony of Dante Mugrace (CONFIDENTIAL and Public versions)

55. OCA Statement No. 2 – Direct Testimony of Marlon Griffing
  - OCA Exhibit Nos. MFG-1 through MFG-21
56. OCA Statement No. 3 – Direct Testimony of David Garret and Errata to Direct Testimony, filed on July 8, 2024.
  - OCA Exhibit Nos. DJG-1 through DJG-14
57. OCA Statement No. 4 – Direct Testimony of Dr. Karl Pavlovic
  - OCA Exhibit Nos. KRP-1 through KRP-9
58. OCA Statement No. 5 – Direct Testimony of Roger Colton
  - OCA Exhibit Nos. RDC-1 through RDC-19
59. OCA Statement No. 6 – Direct Testimony of Barbara Alexander
  - OCA Exhibit Nos. BA-1 through BA-10
60. OCA Statement No. 7 – Direct Testimony of Rao Konidena

**(H) OCA Rebuttal Testimony**

61. OCA Statement No. 4R – Rebuttal Testimony of Dr. Karl Pavlovic
  - OCA Exhibit Nos. KRP-1R through KRP-8R
62. OCA Statement No. 6R – Rebuttal Testimony of Barbara Alexander
  - OCA Exhibit No. BA-11

**(I) OCA Surrebuttal Testimony**

63. OCA Statement No. 1SR – Surrebuttal Testimony of Dante Mugrace (CONFIDENTIAL and public versions)
  - OCA Exhibit Nos. DM-SR-1 through DM-SR-23
64. OCA Statement No. 2SR – Surrebuttal Testimony of Marlon Griffing
65. OCA Statement No. 3SR – Surrebuttal Testimony of David Garrett

66. OCA Statement No. 4SR – Surrebuttal Testimony of Dr. Karl Pavlovic (CONFIDENTIAL and public versions)

67. OCA Statement No. 5SR – Surrebuttal Testimony of Roger Colton

68. OCA Statement No. 6SR – Surrebuttal Testimony of Barabara Alexander

69. OCA Statement No. 7SR – Surrebuttal Testimony of Rao Konidena

**(J) OSBA Direct Testimony**

70. OSBA Statement No. 1 – Direct Testimony of Mark D. Ewen

- OSBA Exhibit No. IEc-1

**(K) OSBA Surrebuttal Testimony**

71. OSBA Statement No. 1-S – Surrebuttal Testimony of Mark D. Ewen

- OSBA Exhibit No. IEc-S1

**(L) CAUSE-PA Direct Testimony**

72. CAUSE-PA St. No. 1 – Direct Testimony of Harry Geller

- CAUSE-PA Exhibit No. 1
- CAUSE-PA Appendix A and B

**(M) CAUSE-PA Surrebuttal Testimony**

73. CAUSE-PA St. No. 1-SR – Surrebuttal Testimony of Harry Geller

**(N) Large User Groups Direct Testimony**

74. Large User Groups Statement No. 1 – Direct Testimony of Brian C. Andrews

- Large User Groups Exhibit Nos. BCA-1 through BCA-8

75. Large User Groups Statement No. 1S – Supplemental Direct Testimony of Brian C. Andrews

- Large User Groups Exhibit Nos. BCA-9 through BCA-11

**(O) Large User Groups Rebuttal Testimony**

76. Large User Groups Statement No. 1R – Rebuttal Testimony of Brian C. Andrews

- Large User Groups Exhibit No. BCA-12

**(P) Large User Groups Surrebuttal Testimony**

77. Large Users Group Statement No. 1SR – Surrebuttal Testimony of Brian C. Andrews

**(Q) IBEW 777 Evidence**

78. IBEW-1 – Annual Affiliate Report (2024.05.28\_DPL DE Annual Affiliate Report) (attached to Prefiled Surrebuttal Testimony of D. Kline)

79. IBEW-2 - Capital & O&M Project List (Johnston\_CN9692 Revised Capital Workplan and 2024 OM Project) (attached to Prefiled Surrebuttal Testimony of D. Kline)

80. IBEW-3 - Reconciliation ([BGE] Exhibit 2023 Final Reconciliation) (attached to Prefiled Surrebuttal Testimony of D. Kline)

81. IBEW-4 - Workforce Planning Compliance Report ([APS] 2020 Workforce Planning Compliance Report) (attached to Prefiled Surrebuttal Testimony of D. Kline)

82. IBEW-5 - FE PA's Responses to IBEW's Discovery Requests, Set-I.

83. IBEW-6 - Pennsylvania National Electric Vehicle Infrastructure (NEVI) Formula Program: Important Considerations for Prospective Contractors

84. IBEW-7 – Prefiled Direct Testimony of Daulph Kline

85. IBEW-8 – Prefiled Rebuttal Testimony of Daulph Kline with Exhibit Nos. IBEW-8-A, 8-B, and 8-C

86. IBEW-9 – Prefiled Surrebuttal Testimony of Daulph Kline

**(R) Walmart Direct Testimony, with Verification attached.**

87. Walmart Statement No. 1 – Direct Testimony of Lisa V. Perry

- Walmart Exhibit Nos. LVP-1 through LVP-3

**(S) PSU Direct Testimony**

88. PSU Statement No. 1 – Direct Testimony of James L. Crist

- PSU Exhibit Nos. JLC-1

**(T) PSU Rebuttal Testimony**

89. PSU Statement No. 1-R – Rebuttal Testimony of James L. Crist

**(U) PSU Surrebuttal Testimony**

90. PSU Statement No. 1-SR – Surrebuttal Testimony of James L. Crist

- PSU Exhibit Nos. JLC1-SR and JLC2-SR

**III. REQUEST FOR ADMISSION OF TESTIMONY AND EXHIBITS**

91. The Joint Petitioners request that the above identified testimony and exhibits be moved into the record without a hearing.

92. Consistent with the Motion for Protective Order that was filed in this proceeding, the Parties request that all filings, statements, and exhibits designated as “CONFIDENTIAL” or “HIGHLY CONFIDENTIAL” be placed in non-public folders by the Secretary’s Bureau of the Commission.

93. Verifications for the testimony and exhibits of FE PA are attached hereto as **Appendix A**. Verifications for the testimony and exhibits of CAUSE-PA are attached hereto as **Appendix B**. Verifications for the OSBA are attached as **Appendix C**. A verification for the Large User Groups is attached hereto as **Appendix D**. Walmart’s verification is attached as **Appendix E**. Verifications for the other Parties’ testimony and exhibits are being provided separately, or were provided by the Parties previously.

94. The admission by stipulation of the foregoing testimony and exhibits is subject to Commission approval of the Joint Petition for Settlement which will be filed by September 13, 2024, the Reply Brief due date established in this proceeding. The Joint Petitioners reserve their respective rights to submit additional testimony and to cross-examine witnesses in the event the Joint Petition for Settlement is not approved or is otherwise approved with modification causing a Party(ies) to withdraw from the Joint Petition for Settlement and proceed to litigation.

WHEREFORE, the Joint Petitioners, by their respective counsel, respectfully request that Administrative Law Judges Katrina Dunderdale and Emily DeVoe admit the foregoing testimony and exhibits into the record in this proceeding.

Respectfully submitted,



Date: 8/19/24

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Date: August 19, 2024

*Counsel for Bureau of Investigation & Enforcement*

/s/ Darryl Lawrence, Esquire

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\_\_\_\_\_

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[pulp@pautilitylawproject.org](mailto:pulp@pautilitylawproject.org)

Date: August 18, 2024

*Counsel for CAUSE-PA*

/s/ Charis Mincavage, Esquire

Date: 8/19/24

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Susan E. Bruce, Esquire  
Kenneth R. Stark, Esquire  
Harrison Ryan Block, Esquire  
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*Counsel for Met-Ed Industrial Users Group, Penelec  
Industrial Customer Alliance, and West Penn Power  
Industrial Intervenors*

/s/ Nicholas Enoch, Esquire

Date: 8/19/24

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*Counsel for IBEW 777*

/s/ Brian T. Kadlubek, Esquire  
Brian T. Kadlubek, Esquire  
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Date: 8/19/24

*Counsel for IBEW Local 459*

/s/ Derrick P. Williamson, Esquire  
Derrick P. Williamson, Esquire  
Barry A. Naum, Esquire  
Steven W. Lee, Esquire  
Spilman Thomas & Battle PLLC  
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[bnaum@spilmanlaw.com](mailto:bnaum@spilmanlaw.com)  
[slee@spilmanlaw.com](mailto:slee@spilmanlaw.com)

Date: 8/19/24

*Counsel for Walmart*

/s/ Whitney E. Snyder, Esquire  
Whitney E. Snyder, Esquire  
Thomas J. Sniscak, Esquire  
Hawke McKeon & Sniscak, LLP  
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[tjsniscak@hmslegal.com](mailto:tjsniscak@hmslegal.com)

Date: 8/19/24

*Counsel for PSU*

/s/ Patrick K. Lemon  
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Joseph S. Pass, Esquire  
Jubelirer, Pass & Intrieri, P.C.  
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[pk1@jpilaw.com](mailto:pk1@jpilaw.com)  
[jsp@jpilaw.com](mailto:jsp@jpilaw.com)

Date: 8/19/24

*Counsel for UWUA System Local 102*

# **APPENDIX A**



**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

<b>PENNSYLVANIA PUBLIC UTILITY COMMISSION ET AL.</b>	:	<b>DOCKET NOS. R-2024-3047068 et al.</b>
<b>V.</b>	:	
<b>FIRSTENERGY PENNSYLVANIA ELECTRIC COMPANY</b>	:	

**VERIFICATION**

I, Timothy Lyons, being a Partner with ScottMadden, Inc., hereby state that the testimony set forth in FE PA Statement Nos. 7, 7-R as corrected by errata submitted on August 19, 2024 is true and correct to the best of my knowledge, information, and belief and that if asked orally at a hearing in this matter my answers would be as set forth therein. I further state that I am sponsoring certain responses to the Commission's filing requirements and standard data requests where my name is indicated as the sponsoring witness. I am also sponsoring FE PA Exhibits TSL-1 through TSL-5 and TSL R-1 and TSL-R2. I hereby state that the aforementioned exhibits are true and correct to the best of my knowledge, information, and belief. I also am sponsoring any discovery responses attached to other parties' testimony, in which I am noted as the sponsoring witness.

I understand that the statements herein are made subject to the penalties of 18 Pa.C.S. § 4904 relating to unsworn falsification to authorities.

8.17.2024  
Date

Timothy S. Lyons,  
Timothy Lyons

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

<b>PENNSYLVANIA PUBLIC UTILITY COMMISSION ET AL.</b>	:	<b>DOCKET NOS. R-2024-3047068 et al.</b>
	:	
<b>V.</b>	:	
	:	
<b>FIRSTENERGY PENNSYLVANIA ELECTRIC COMPANY</b>	:	

**VERIFICATION**

I, John J. Spanos, being associated with the firm of Gannett Fleming Valuation and Rate Consultants, LLC as President, hereby state that the testimony set forth in FE PA Statement Nos. 9 and 9-R is true and correct to the best of my knowledge, information, and belief and that if asked orally at a hearing in this matter my answers would be as set forth therein. I further state that I am sponsoring certain responses to the Commission’s filing requirements and standard data requests where my name is indicated as the sponsoring witness. I am also sponsoring FE PA Exhibits JJS-1 through JJS-18. I hereby state that the aforementioned exhibits are true and correct to the best of my knowledge, information, and belief.

I understand that the statements herein are made subject to the penalties of 18 Pa.C.S. § 4904 relating to unsworn falsification to authorities.

August 15, 2024  
\_\_\_\_\_  
Date

  
\_\_\_\_\_  
John J. Spanos

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

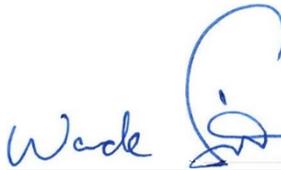
<b>PENNSYLVANIA PUBLIC UTILITY COMMISSION ET AL.</b>	:	
	:	<b>DOCKET NOS. R-2024-3047068 et al.</b>
	:	
<b>V.</b>	:	
	:	
	:	
<b>FIRSTENERGY PENNSYLVANIA ELECTRIC COMPANY</b>	:	

**VERIFICATION**

I, Wade Smith, being the President, FirstEnergy Utilities for FirstEnergy Service Company, hereby state that the testimony set forth in FE PA Statement Nos. 2 and 2-R is true and correct to the best of my knowledge, information, and belief and that if asked orally at a hearing in this matter my answers would be as set forth therein. I also am sponsoring any discovery responses attached to other parties' testimony, in which I am noted as the sponsoring witness.

I understand that the statements herein are made subject to the penalties of 18 Pa.C.S. § 4904 relating to unsworn falsification to authorities.

August 15, 2024



\_\_\_\_\_  
Wade Smith

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**PENNSYLVANIA PUBLIC UTILITY  
COMMISSION ET AL.**

:  
: **DOCKET NOS. R-2024-3047068 et al.**  
:

**V.**

**FIRSTENERGY PENNSYLVANIA  
ELECTRIC COMPANY**

:  
:  
:  
:  
:

**VERIFICATION**

I, Joanne Savage, being the Director of the Rates and Regulatory Affairs Department for FirstEnergy Service Company, hereby state that the testimony set forth in FE PA Statement Nos. 1 and 1R is true and correct to the best of my knowledge, information, and belief and that if asked orally at a hearing in this matter my answers would be as set forth therein. I further state that I am sponsoring certain responses to the Commission's filing requirements and standard data requests where my name is indicated as the sponsoring witness. I am also sponsoring FE PA Exhibits JMS-1 through JMS-5, with JMS-4 being HIGHLY CONFIDENTIAL. I hereby state that the aforementioned exhibits are true and correct to the best of my knowledge, information, and belief.

I understand that the statements herein are made subject to the penalties of 18 Pa.C.S. § 4904 relating to unsworn falsification to authorities.

8/15/24  
Date

Joanne M. Savage  
Joanne Savage

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

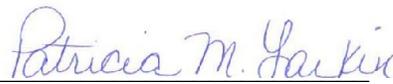
<b>PENNSYLVANIA PUBLIC UTILITY COMMISSION ET AL.</b>	:	
	:	<b>DOCKET NOS. R-2024-3047068 et al.</b>
	:	
<b>V.</b>	:	
	:	
	:	
<b>FIRSTENERGY PENNSYLVANIA ELECTRIC COMPANY</b>	:	

**VERIFICATION**

I, Patricia Larkin, being an Analyst in the Rates and Regulatory Affairs Department - Pennsylvania, hereby state that the testimony set forth in FE PA Statement Nos. 3 and 3-R is true and correct to the best of my knowledge, information, and belief and that if asked orally at a hearing in this matter my answers would be as set forth therein. I further state that I am sponsoring certain responses to the Commission's filing requirements and standard data requests where my name is indicated as the sponsoring witness. I am also sponsoring FE PA Exhibits PML-1 through PLM-8, with PLM-7 being CONFIDENTIAL. I hereby state that the aforementioned exhibits are true and correct to the best of my knowledge, information, and belief. I also am sponsoring any discovery responses attached to other parties' testimony, in which I am noted as the sponsoring witness.

I understand that the statements herein are made subject to the penalties of 18 Pa.C.S. § 4904 relating to unsworn falsification to authorities.

8/15/24  
Date

  
Patricia Larkin



**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

<b>PENNSYLVANIA PUBLIC UTILITY COMMISSION ET AL.</b>	:	<b>DOCKET NOS. R-2024-3047068 et al.</b>
	:	
<b>V.</b>	:	
	:	
<b>FIRSTENERGY PENNSYLVANIA ELECTRIC COMPANY</b>	:	

**VERIFICATION**

I, Mark A. Kehl, being the Manager of Rates & Regulatory Affairs - Pennsylvania, for FirstEnergy Service Company, hereby state that the testimony set forth in FE PA Statement Nos. 6 and 6-R is true and correct to the best of my knowledge, information, and belief and that if asked orally at a hearing in this matter my answers would be as set forth therein. I further state that I am sponsoring certain responses to the Commission's filing requirements and standard data requests where my name is indicated as the sponsoring witness. I am also sponsoring FE PA Exhibits MAK-1 through MAK-6. I hereby state that the aforementioned exhibits are true and correct to the best of my knowledge, information, and belief. I also am sponsoring any discovery responses attached to other parties' testimony, in which I am noted as the sponsoring witness.

I understand that the statements herein are made subject to the penalties of 18 Pa.C.S. § 4904 relating to unsworn falsification to authorities.

Aug 15, 2024  
Date

  
Mark A. Kehl

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

<b>PENNSYLVANIA PUBLIC UTILITY COMMISSION ET AL.</b>	:	<b>DOCKET NOS. R-2024-3047068 et al.</b>
	:	
<b>V.</b>	:	
	:	
<b>FIRSTENERGY PENNSYLVANIA ELECTRIC COMPANY</b>	:	

**VERIFICATION**

I, Mark A. Jones, being the Vice President, Customer Engagement, for FirstEnergy Service Company, hereby state that the testimony set forth in FE PA Statement Nos. 8 as corrected by the errata submitted on August 19, 2024, 8-R and 8-SR is true and correct to the best of my knowledge, information, and belief and that if asked orally at a hearing in this matter my answers would be as set forth therein. I am also sponsoring FE PA Exhibits MAJ-1 through MAJ-5. I hereby state that the aforementioned exhibits are true and correct to the best of my knowledge, information, and belief. I also am sponsoring any discovery responses attached to other parties' testimony, in which I am noted as the sponsoring witness.

I understand that the statements herein are made subject to the penalties of 18 Pa.C.S. § 4904 relating to unsworn falsification to authorities.

August 15, 2024  
Date

  
\_\_\_\_\_  
Mark A. Jones

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

<b>PENNSYLVANIA PUBLIC UTILITY COMMISSION ET AL.</b>	:	<b>DOCKET NOS. R-2024-3047068 et al.</b>
	:	
<b>V.</b>	:	
	:	
<b>FIRSTENERGY PENNSYLVANIA ELECTRIC COMPANY</b>	:	
	:	

**VERIFICATION**

I, Jason DeStigter hereby state that the facts set forth in the pre-marked statements and exhibits listed below are true and correct to the best of my knowledge, information, and belief. I understand that the statements herein are made subject to the penalties of 18 Pa.C.S. § 4904 (relating to unsworn falsification to authorities).

- FE PA Statement No. 14-R and Exhibit JDS-1

18 August 2024

\_\_\_\_\_  
Date



\_\_\_\_\_  
Jason DeStigter

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**PENNSYLVANIA PUBLIC UTILITY** :  
**COMMISSION ET AL.** : **DOCKET NOS. R-2024-3047068 et al.**  
 :  
**V.** :  
 :  
**FIRSTENERGY PENNSYLVANIA** :  
**ELECTRIC COMPANY** :

**VERIFICATION**

I, Dylan W. D’Ascendis, partner at ScottMadden, Inc., hereby state that the testimony set forth in FE PA Statement Nos. 10 and 10-R is true and correct to the best of my knowledge, information, and belief and that if asked orally at a hearing in this matter my answers would be as set forth therein. I am also sponsoring FE PA Exhibits DWD-1 through DWD-9, DWD-1R through DWD-17R and DWD-1RJ through DWD-2RJ. I hereby state that the aforementioned exhibits are true and correct to the best of my knowledge, information, and belief. I also am sponsoring any discovery responses attached to other parties’ testimony, in which I am noted as the sponsoring witness.

I understand that the statements herein are made subject to the penalties of 18 Pa.C.S. § 4904 relating to unsworn falsification to authorities.

August 15, 2024  
Date

  
\_\_\_\_\_  
Dylan W. D’Ascendis

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

<b>PENNSYLVANIA PUBLIC UTILITY COMMISSION ET AL.</b>	:	
	:	<b>DOCKET NOS. R-2024-3047068 et al.</b>
	:	
<b>V.</b>	:	
	:	
<b>FIRSTENERGY PENNSYLVANIA ELECTRIC COMPANY</b>	:	
	:	

**VERIFICATION**

I, Tracy Ashton, being the Assistant Controller – Corporate, for FirstEnergy Service Company, hereby state that the testimony set forth in FE PA Statement Nos. 4 and 4-R is true and correct to the best of my knowledge, information, and belief and that if asked orally at a hearing in this matter my answers would be as set forth therein. I further state that I am sponsoring certain responses to the Commission’s filing requirements and standard data requests where my name is indicated as the sponsoring witness. I am also sponsoring FE PA Exhibits TMA-1 through TMA-5. I hereby state that the aforementioned exhibits are true and correct to the best of my knowledge, information, and belief. I also am sponsoring any discovery responses attached to other parties’ testimony, in which I am noted as the sponsoring witness.

I understand that the statements herein are made subject to the penalties of 18 Pa.C.S. § 4904 relating to unsworn falsification to authorities.

August 15, 2024  
Date

  
\_\_\_\_\_  
Tracy Ashton

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**PENNSYLVANIA PUBLIC UTILITY COMMISSION ET AL.** :  
: **DOCKET NOS. R-2024-3047068 et al.**  
:  
V. :  
:  
:  
**FIRSTENERGY PENNSYLVANIA ELECTRIC COMPANY** :  
:

**VERIFICATION**

I, Gregory J. Gawlik, being the Assistant Controller, Tax, for FirstEnergy Service Company, hereby state that the testimony set forth in FE PA Statement Nos. 5 and 5-R is true and correct to the best of my knowledge, information, and belief and that if asked orally at a hearing in this matter my answers would be as set forth therein. I further state that I am sponsoring certain responses to the Commission’s filing requirements and standard data requests where my name is indicated as the sponsoring witness. I am also sponsoring FE PA Exhibits GJG-1 through GJG-3, all of which are CONFIDENTIAL. I hereby state that the aforementioned exhibits are true and correct to the best of my knowledge, information, and belief. I also am sponsoring any discovery responses attached to other parties’ testimony, in which I am noted as the sponsoring witness.

I understand that the statements herein are made subject to the penalties of 18 Pa.C.S. § 4904 relating to unsworn falsification to authorities.

8-15-2024  
Date

  
Gregory J. Gawlik

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

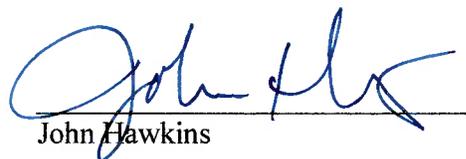
**PENNSYLVANIA PUBLIC UTILITY** :  
**COMMISSION ET AL.** : **DOCKET NOS. R-2024-3047068 et al.**  
 :  
V. :  
 :  
**FIRSTENERGY PENNSYLVANIA** :  
**ELECTRIC COMPANY** :

**VERIFICATION**

I, John Hawkins, being the President, Pennsylvania Operations, for FirstEnergy Service Company, hereby state that the testimony set forth in FE PA Statement Nos. 12-R and 12-SR is true and correct to the best of my knowledge, information, and belief and that if asked orally at a hearing in this matter my answers would be as set forth therein.

I understand that the statements herein are made subject to the penalties of 18 Pa.C.S. § 4904 relating to unsworn falsification to authorities.

8/19/24  
Date

  
John Hawkins

# **APPENDIX B**

**BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**Pennsylvania Public Utility Commission** :  
 :  
 **v.** : **Docket No. R-2024-3047068**  
 :  
 **First Energy Pennsylvania Electric** :  
 **Company** :

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**VERIFICATION**

I, Harry S. Geller, Esq., verify that the following testimony, exhibit, and appendices were prepared by me or under my direct supervision, and are true and correct to the best of my knowledge, information and belief, and that I expect to be able to prove the same at a hearing held in this matter:

- Direct Testimony of Harry S. Geller, Esq. on Behalf of the Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania (CAUSE-PA Statement 1)
  - 82 pages of written testimony
  - CAUSE-PA Exhibit 1: Energy Burden Charts
  - Appendix A: Resume, Harry S. Geller, Esq.
  - Appendix B: Cited Discovery Responses
- Surrebuttal Testimony of Harry S. Geller, Esq. on Behalf of the Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania (CAUSE-PA Statement 1-SR)
  - 38 pages of written testimony

I understand that the statements herein are made subject to the penalties of 18 Pa. C.S. § 4904 (relating to unsworn falsification to authorities).

A handwritten signature in blue ink that reads "Harry S. Geller". The signature is written in a cursive style with a long horizontal flourish extending to the right.

Dated: August 13, 2024

Harry S. Geller, Esq.

# **APPENDIX C**

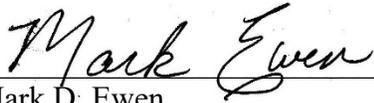
**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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

**VERIFICATION**

I, Mark D. Ewen, hereby state that the facts set forth in the Direct Testimony labelled OSBA Statement No. 1 and referenced Exhibits are true and correct to the best of my knowledge, information, and belief, and that I expect 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 19 Pa. C.S. § 4904 (relating to unsworn falsification to authorities).

Date: 6/24/2024

  
\_\_\_\_\_  
Mark D. Ewen

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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

**VERIFICATION**

I, Mark D. Ewen, hereby state that the facts set forth in the Surrebuttal Testimony labelled OSBA Statement No. 1-S and associated Exhibit IEC-S1 are true and correct to the best of my knowledge, information, and belief, and that I expect 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 19 Pa. C.S. § 4904 (relating to unsworn falsification to authorities).

Date: August 8, 2024 \_\_\_\_\_

  
\_\_\_\_\_  
Mark D. Ewen

# **APPENDIX D**

VERIFICATION

I, Brian C. Andrews, Consultant at Brubaker & Associates, Inc. ("BAI"), hereby state that the facts set forth in Large User Groups Statement Nos. 1, 1S, 1R, and 1SR are true and correct to the best of my knowledge, information and belief and that I expect 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 (relating to unsworn falsification to authorities).

August 13, 2024  
Date

  
Signature

# **APPENDIX E**

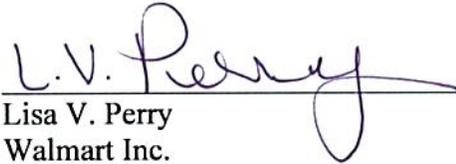
**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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

**VERIFICATION**

I, Lisa V. Perry, hereby state that the facts in my Direct Testimony, are true and correct to the best of my knowledge, information, and belief, and that I expect to be able to prove the same at any hearing held in this matter. I understand the statements herein are made subject to the penalties of 18 Pa. C.S. §4904 (relating to falsification to authorities).

Date: 6/25/2024

  
\_\_\_\_\_  
Lisa V. Perry  
Walmart Inc.