

December 13, 2024

**Via Electronic Filing**

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

**Re: Docket No. F-2024-3050037  
Jerry Krizo v. FirstEnergy Pennsylvania Electric Company  
Motion for Prehearing Conference**

Dear Secretary Chiavetta:

Attached for filing is the Motion of FirstEnergy Pennsylvania Electric Company (Penelec Rate District) for a Prehearing Conference in the above-referenced proceeding.

A copy of the attached Motion 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. Mark A. Hoyer, PA Public Utility Commission [w/encls.]  
Tori Giesler, Esquire, FirstEnergy Service Company [w/encls.]  
Jerry Krizo [w/encls.]

**Re: Docket No. F-2024-3050037  
Jerry Krizo v. FirstEnergy Pennsylvania Electric Company  
Motion for Prehearing Conference**

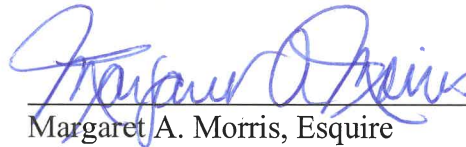
**CERTIFICATE OF SERVICE**

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 First-Class Mail**

Jerry Krizo  
18392 S Main Street  
Corry, PA 16407

Dated: December 13, 2024

  
\_\_\_\_\_  
Margaret A. Morris, Esquire

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

JERRY KRIZO

v.

FIRSTENERGY PENNSYLVANIA ELECTRIC  
COMPANY

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Docket No. F-2024-3050037

**NOTICE TO PLEAD**

Pursuant to 52 Pa. Code § 5.103, you are hereby notified that if you do not file a written response to the enclosed Motion for Prehearing Conference of FirstEnergy Pennsylvania Electric Company, within twenty (20) days from service of this Notice, the facts set forth by FirstEnergy Pennsylvania Electric Company in the Motion for Prehearing Conference may be deemed to be true, whereby requiring no other proof. All pleadings, such as Answer to Motion to Consolidate, must be filed with the Secretary of the Pennsylvania Public Utility Commission, with a copy served to counsel for FirstEnergy Pennsylvania Electric Company, Margaret A. Morris, Esq., and the Honorable Mark A. Hoyer, the Administrative Law Judge presiding over this issue.

**File by Mail or e-filing with:**

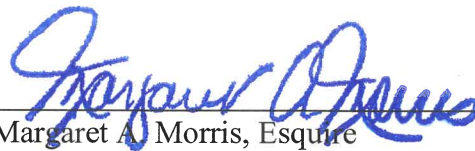
Rosemary Chiavetta, Esquire  
Secretary  
Pennsylvania Public Utility Commission  
P.O. Box 3265  
Harrisburg, PA 17105-3265

**With a copy to:**

Margaret A. Morris, Esquire  
Reger Rizzo & Darnall LLP  
Cira Centre, 13<sup>th</sup> Floor  
2929 Arch Street  
Philadelphia, PA 19104  
[mmorris@regerlaw.com](mailto:mmorris@regerlaw.com)

The Hon. Mark A. Hoyer  
[mhoyer@pa.gov](mailto:mhoyer@pa.gov)

Date: December 13, 2024



Margaret A. Morris, Esquire  
Attorney ID No. 75048  
Reger Rizzo & Darnall LLP  
Cira Centre, 13<sup>th</sup> Floor  
2929 Arch Street  
Philadelphia, PA 19104  
(215) 495-6524 (tel.)  
[mmorris@regerlaw.com](mailto:mmorris@regerlaw.com)

*Counsel for FirstEnergy Pennsylvania Electric  
Company (Penelec Rate District)*

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

JERRY KRIZO

v.

FIRSTENERGY PENNSYLVANIA ELECTRIC  
COMPANY

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Docket No. F-2024-3050037

**MOTION FOR PREHEARING CONFERENCE  
OF FIRSTENERGY PENNSYLVANIA ELECTRIC COMPANY**

FirstEnergy Pennsylvania Electric Company (FE PA, or Company), by and through its attorneys, Reger Rizzo & Darnall LLP, and pursuant to 52 Pa. Code § 5.224, respectfully request that the Honorable Mark A. Hoyer (Judge Hoyer) of the Pennsylvania Public Utility Commission (Commission) allow and fix a time for a prehearing conference to facilitate the scheduling of a WARM Energy Audit (WARM Audit). In support thereof, the Company avers as follows:

1. Jerry Krizo (Complainant) filed a Formal Complaint, posted July 11, 2024, against the Company, disputing the billed monthly usage for electric service provided to 18392 S. Main Street, Corry, Pennsylvania (Service Location).
2. On July 31, 2024, the Company filed an Answer and New Matter denying the material allegations therein.
3. By Notice, dated September 17, 2024, an Initial Call-In Telephonic Hearing was scheduled for Friday, November 22, 2024, before the Honorable Katrina L. Dunderdale (Judge Dunderdale).
4. On November 22, 2024, the hearing was held before Judge Hoyer due to the unavailability of Judge Dunderdale. The parties engaged in settlement discussions, and it was determined that all parties stood to benefit from an Audit to determine exactly what is being used

at the Service Location. Judge Hoyer directed the undersigned counsel to coordinate with the Complainant to schedule a date and time for the proposed WARM Audit.

5. The undersigned counsel was unsuccessful in reaching the Complainant by phone. On November 22, 2024, being unable to reach her by phone, a letter was mailed to the Complainant proposing available dates for the WARM Audit. The Complainant did not respond to the November Letter. A copy of the Letter, dated November 22, 2024, is provided as Attachment 1.

6. The undersigned counsel attempted unsuccessfully on numerous occasions<sup>1</sup> to contact the Complainant by phone to discuss the potential dates for the WARM Audit. The Complainant does not have voice mail or an answering machine so no message could be left.

7. On December 5, 2024, a follow up letter was mailed to the Complainant *via* US Post Office Priority Mail proposing additional available dates for the WARM Audit. The US Post Office was unable to deliver the letter on December 9, 2024. On December 10, 2024, the US Post Office delivered the Letter to an individual at the Service Location. A copy of the Letter, dated December 5, 2024, and the US Post Office Tracking Information is provided as Attachment 2.

8. As of the date of this Motion, and despite the directive given by Judge Hoyer at the hearing on November 22, 2024, and the two mailed Letters, the Complainant has not contacted the undersigned Counsel to schedule the WARM Audit.

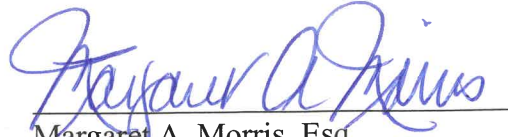
9. The Company believes it is in the best interest of the parties and the Commission to schedule a prehearing conference to, among other things, facilitate the scheduling of a WARM Audit.

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<sup>1</sup> Phone call attempts are as follows: 11/25/24 at 10: 37 AM and 5:40 PM; 12/2/24 at 10:09 AM, 12:29 PM, 2:35 PM, 4:48 PM and 7:30 PM; 12/3/24 at 9:44 AM and 1:44 PM; 12/4/24 at 8:37 AM and 1:27 PM; and 12/9/24 at 3:55 PM and 4:31 PM.

**WHEREFORE**, FirstEnergy Pennsylvania Electric Company, respectfully requests that the Honorable Mark A. Hoyer issue an Order scheduling a Prehearing Conference in this matter.

Respectfully submitted,



Margaret A. Morris, Esq.  
Attorney ID No. 75048  
Reger Rizzo & Darnall LLP  
Cira Centre, 13<sup>th</sup> Floor  
2929 Arch Street  
Philadelphia, PA 19104  
(215) 495-6524 tel.  
(215) 495-6600 fax  
[mmorris@regerlaw.com](mailto:mmorris@regerlaw.com)

Date: December 13, 2024

*Counsel for FirstEnergy Pennsylvania Electric  
Company (Penelec Rate District)*

Docket No. F-2024-3050037  
Jerry Krizo v. FirstEnergy Pennsylvania Electric Company  
(Penelec Rate District)

Attachment 1

Letter, dated November 22, 2024

**REGER RIZZO  
DARNALL LLP**  
ATTORNEYS AT LAW

Margaret A. Morris, Esquire  
Partner  
mmorris@regerlaw.com

Cira Centre, 13th Floor  
2929 Arch Street  
Philadelphia, PA 19104

Main: 215.495.6500  
Direct: 215.495.6524  
Fax: 215.495.6600

November 22, 2024

**VIA FIRST-CLASS MAIL**

Jerry Krizo  
18392 S Main Street  
Corry, PA 16407

**Re: Docket No. F-2024-3050037  
Jerry Krizo v. FirstEnergy Pennsylvania Electric Company  
Potential Date for Energy Audit**

Dear Ms. Krizo:

Consistent with today's hearing before the Honorable Mark Hoyer, I attempted to reach you by phone today to discuss the potential dates for the energy audit. Unfortunately, you were not available and do have voice message.

The available dates for the energy audit are:

**Wednesday, December 4, 2024 -either morning or afternoon  
Thursday, December 5, 2024-either morning or afternoon  
Tuesday, December 10, 2024-either morning or afternoon**

Please contact me at [REDACTED] to advise which date and timeframe works for you. Thank you for your prompt response.

Very truly yours,

Reger Rizzo & Darnall LLP



Margaret A. Morris, Esquire

MAM/mam

cc: Tori Giesler, Esquire, FirstEnergy Service Company

Docket No. F-2024-3050037  
Jerry Krizo v. FirstEnergy Pennsylvania Electric Company  
(Penelec Rate District)

Attachment 2

Letter, dated December 5, 2024  
and USPS Tracking Information

REGER RIZZO  
DARNALL LLP  
ATTORNEYS AT LAW

Margaret A. Morris, Esquire  
Partner  
mmorris@regerlaw.com

Cira Centre, 13th Floor  
2929 Arch Street  
Philadelphia, PA 19104

Main: 215.495.6500  
Direct: 215.495.6524  
Fax: 215.495.6600

December 5, 2024

**VIA PRIORITY MAIL**

Jerry Krizo  
18392 S Main Street  
Corry, PA 16407

**Re: Docket No. F-2024-3050037  
Jerry Krizo v. FirstEnergy Pennsylvania Electric Company  
Potential Date for Energy Audit**

Dear Ms. Krizo:

This is a follow-up to my prior correspondence, dated November 22, 2024. Consistent with the directive at the scheduled hearing on November 22, 2024, before the Honorable Mark Hoyer, I attempted unsuccessfully to reach you by phone on numerous occasions.<sup>1</sup> Unfortunately, you were not available, and you do not have voice mail. The available dates listed in my November 22, 2024 correspondence are no longer available.

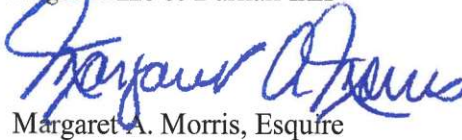
The current available dates for the energy audit are:

**Tuesday, December 17, 2024—either morning or afternoon  
Wednesday, December 18, 2024—either morning or afternoon  
Thursday, December 19, 2024—either morning or afternoon**

Please contact me at [REDACTED] to advise which date and timeframe works for you. Thank you for your prompt response.

Very truly yours,

Reger Rizzo & Darnall LLP



Margaret A. Morris, Esquire

MAM/mam

cc: The Hon. Mark Hoyer, PA PUC  
Tori Giesler, Esquire, FirstEnergy Service Company

<sup>1</sup> Phone call attempts are as follows: 11/25/24 at 10:37 AM and 5:40 PM; 12/2/24 at 10:09 AM, 12:29 PM, 2:35 PM, 4:48 PM and 7:30 PM; 12/3/24 at 9:44 AM and 1:44 PM; and 12/4/24 at 8:37 AM and 1:27 PM.

Tracking Number:

**9505515513464340924272**



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### Latest Update

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**Delivered**

**Delivered, Left with Individual**

CORRY, PA 16407

December 10, 2024, 11:43 am

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