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February 28, 2025

Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street, 2nd Floor  
Harrisburg, PA 17120

**VIA ELECTRONIC FILING**

**RE: Joint Application of Metropolitan Edison Company, Pennsylvania Electric Company, Pennsylvania Power Company, West Penn Power Company, Keystone Appalachian Transmission Company, Mid-Atlantic Interstate Transmission, LLC, and FirstEnergy Pennsylvania Electric Company for All of the Necessary Authority, Approvals, and Certificates of Public Convenience for (1) the Agreements and Plans of Merger; Docket Nos. A-2023-3038771, A-2023-3038792, A-2023-3038793, A-2023-3038794, A-2023-3038795, A-2023-3038807, A-2023-3038808, G-2023-3038818, G-2023-3038819, G-2023-3038820, G-2023-3038821, G-0002095**

Dear Secretary Chiavetta:

Attached for filing with the Pennsylvania Public Utility Commission is the Notice of Appearance of Susan E. Bruce, Charis Mincavage, and Rebecca Kimmel on behalf of the Industrial Energy Consumers of Pennsylvania ("IECPA"), in the above-referenced proceeding.

As evidenced by the attached Certificate of Service, all parties to this proceeding are being duly served with a copy of this document. Thank you.

Sincerely,

A handwritten signature in black ink that reads 'Charis Mincavage'.

Charis Mincavage  
MCNEES WALLACE & NURICK LLC

Counsel to the Industrial Energy Consumers of Pennsylvania

c: Administrative Law Judge Conrad A. Johnson (via e-mail)  
Administrative Law Judge Emily I. DeVoe (via e-mail)  
Nicholas Miskanic, Legal Assistant (via e-mail)  
Barry A. Naum, Esq. (via e-mail)  
Certificate of Service

## CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true and correct copy of the foregoing document upon the participants, listed below, in accordance with the requirements of Section 1.54 (relating to service by a participant).

### VIA EMAIL

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*Counsel to the Met-Ed Industrial Users Group, the Penelec Industrial Customer Alliance, and the West Penn Power Industrial Intervenors*

Certificate of Service  
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Charis Mincavage

Counsel to the Industrial Energy Consumers  
of Pennsylvania

Dated this 28<sup>th</sup> day of February, 2025, in Harrisburg, Pennsylvania

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Joint Application of Metropolitan Edison Company, Pennsylvania Electric Company, Pennsylvania Power Company, West Penn Power Company, Keystone Appalachian Transmission Company, Mid-Atlantic Interstate Transmission, LLC, and FirstEnergy Pennsylvania Electric Company for All of the Necessary Authority, Approvals, and Certificates of Public Convenience for (1) the Agreements and Plans of Merger; (2) the Establishment of FirstEnergy Pennsylvania Holding Company LLC as an Intermediate Holding Company in the Chain of Ownership of FirstEnergy Pennsylvania Electric Company; (3) the Merger of Metropolitan Edison Company, Pennsylvania Electric Company, Pennsylvania Power Company, and West Penn Power Company with and into FirstEnergy Pennsylvania Electric Company; (4) the Initiation by FirstEnergy Pennsylvania Electric Company of Electric Service in All Territories in this Commonwealth where Metropolitan Edison Company, Pennsylvania Electric Company, Pennsylvania Power Company, and West Penn Power Company Do or May Provide Electric Service; (5) the Abandonment by Metropolitan Edison Company, Pennsylvania Electric Company, Pennsylvania Power Company, and West Penn Power Company of All Electric Service in this Commonwealth; (6) the Adoption by FirstEnergy Pennsylvania Electric Company of Metropolitan Edison Company, Pennsylvania Electric Company, Pennsylvania Power Company, and West Penn Power Company's Existing Tariffs and their Application within New Service and Rate Districts of FirstEnergy Pennsylvania Electric Company Corresponding to their Existing Service Territories as the Met-Ed Rate District, Penelec Rate District, Penn Power Rate	:	
	:	Docket Nos. A-2023-3038771
	:	A-2023-3038792
	:	A-2023-3038793
	:	A-2023-3038794
	:	A-2023-3038795
	:	A-2023-3038807
	:	A-2023-3038808
	:	G-2023-3038818
	:	G-2023-3038819
	:	G-2023-3038820
	:	G-2023-3038821
	:	G-00020956

District, West Penn Rate District, and The :  
Pennsylvania State University Rate :  
District, Respectively; (7) the sale of Class :  
B Membership Interests in Mid-Atlantic :  
Interstate Transmission, LLC held by Met- :  
Ed and Penelec to FirstEnergy Corp.; (8) :  
the Contribution of West Penn Power :  
Company's Transmission Assets to :  
Keystone Appalachian Transmission :  
Company; (9) a Certificate of Public :  
Convenience Conferring Upon Keystone :  
Appalachian Transmission Company the :  
Status of a Pennsylvania Public Utility; :  
(10) Where Necessary, Associated :  
Affiliated Interest Agreements; and (11) :  
Any Other Approvals Necessary to :  
Complete the Contemplated Transaction

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**NOTICE OF APPEARANCE**

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Pursuant to Section 1.25 of the Pennsylvania Public Utility Commission's ("PUC" or "Commission") Regulations, 52 Pa. Code § 1.25, please enter the appearance of Susan E. Bruce, Charis Mincavage, and Rebecca Kimmel on behalf of the Industrial Energy Consumers of Pennsylvania ("IECPA") in the above-referenced proceeding. We are already receiving or have access to a copy of each document issued by the Commission in this matter and do not on the basis of this notice require an additional copy.

Respectfully Submitted,

McNEES WALLACE & NURICK LLC

By 

Susan E. Bruce (I.D. No. 80146)  
Charis Mincavage (I.D. No. 82039)  
Rebecca Kimmel (Pa. I.D. 335097)  
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Dated: February 28, 2025