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March 18, 2025

**Via Electronic Filing**

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

**Re: Docket No. C-2024-3048841  
Matthew A. Glenny v. FirstEnergy Pennsylvania Electric Company  
Docket No. C-2024-3050225  
Michelle Baumia v. FirstEnergy Pennsylvania Electric Company  
Motion to Consolidate of FE PA (Penelec Rate District)**

Dear Secretary Chiavetta:

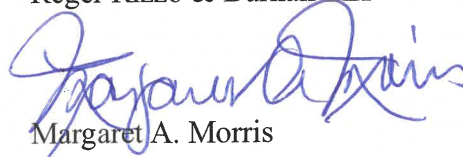
Attached for filing is the Motion of FirstEnergy Pennsylvania Electric Company (Penelec Rate District) to consolidate the Formal Complaints of Matthew A. Glenny at Docket No. C-2024-3048841 and Michelle Baumia at Docket No. C-2024-3050225.

A copy of the attached Motion to Consolidate has been provided to the Complainants 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: Mediator Teri-Lee Rhoades, PA Public Utility Commission [w/encls.]  
Tori Giesler, Esquire, FirstEnergy Service Company [w/encls.]  
Matthew A. Glenny [w/encls.]  
Michelle Baumia [w/encls.]

**Re: Docket No. C-2024-3048841  
Matthew A. Glenny v. FirstEnergy Pennsylvania Electric Company  
Docket No. C-2024-3050225  
Michelle Baumia v. FirstEnergy Pennsylvania Electric Company  
Motion to Consolidate of FE PA (Penelec Rate District)**

**CERTIFICATE OF SERVICE**

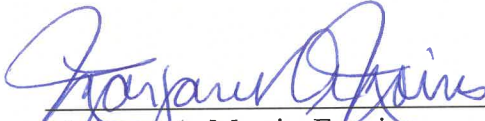
I hereby certify that a true and correct copy of the foregoing document has been served upon the following person(s), in the manner indicated, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

**Via Electronic Mail**

Matthew A. Glenny  
[micmulan@yahoo.com](mailto:micmulan@yahoo.com)

Michelle Baumia  
[micmulan@yahoo.com](mailto:micmulan@yahoo.com)

Dated: March 18, 2025

  
Margaret A. Morris, Esquire

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

MATTHEW A. GLENNY

v.

FIRSTENERGY PENNSYLVANIA  
ELECTRIC COMPANY

Docket No. C-2024-3048841

MICHELLE BAUMIA

v.

FIRSTENERGY PENNSYLVANIA  
ELECTRIC COMPANY

Docket No. C-2024-3050225

**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 to Consolidate 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 to Consolidate 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 where applicable the Administrative Law Judge presiding over the issue.

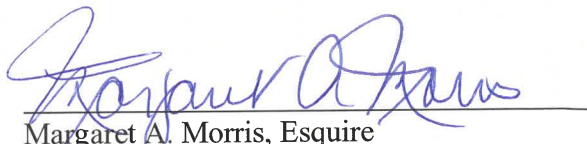
**File by Mail or e-filing with:**

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

**With a copy to:**

Margaret A. Morris, Esquire  
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Date: March 18, 2025



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

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

MATTHEW A. GLENNY :  
 :  
 v. : Docket No. C-2024-3048841  
 :  
 :  
 FIRSTENERGY PENNSYLVANIA ELECTRIC :  
 COMPANY :

MICHELLE BAUMIA :  
 :  
 v. : Docket No. C-2024-3050225  
 :  
 :  
 FIRSTENERGY PENNSYLVANIA ELECTRIC :  
 COMPANY :

**MOTION OF FIRSTENERGY PENNSYLVANIA ELECTRIC COMPANY  
TO CONSOLIDATE FORMAL COMPLAINTS FILED BY  
MATTHEW A. GLENNY AND MICHELLE BAUMIA**

FirstEnergy Pennsylvania Electric Company (Respondent, FE PA, or Company), by and through its attorneys, Reger Rizzo & Darnall LLP, hereby submits its Motion to Consolidate the Formal Complaints of Mathew A. Glenny and Michelle Baumia (Complainants) filed in the above-captioned dockets with the Pennsylvania Public Utility Commission (Commission), pursuant the Commission’s regulations, 52 Pa. Code §§ 5.103 and 5.81. In response thereto, the Respondent avers and represents as follows:

**I. BACKGROUND**

1. On May 2, 2024, Mr. Glenny filed a Formal Complaint with the Commission at Docket No. C-2024-3048841 regarding service to 8374 Loop Road, Alexandria, Pennsylvania

(Service Location) under Account No. 100127024303 (Account) and checked that the utility is threatening to shut off service in his name or already has shut off service.

2. On July 22, 2024, Ms. Baumia filed a Formal Complaint with the Commission at Docket No. C-2024-3050225 regarding service provided to the Service Location under the Mr. Glenny's Account and checked the following boxes on the formal complaint form: the utility is threatening to shut off service or already has shut off service, wants a payment agreement, and "Other" stating the couple's medical issues and requesting an extension of time to pay.

3. On May 22, 2024, and August 12, 2024, pursuant to 52 Pa. Code § 5.62, the Company filed its responsive Answer in each respective docket admitting that the Company issued a 10-day termination notice on June 12, 2024, for an outstanding balance, but otherwise denying the material allegations therein.

4. By Interim Order, dated May 30, 2024, each respective Complaint was sent to mediation with Teri Rhoades assigned as the Mediator.

## **II. CONSOLIDATION**

5. Section 5.81 of the Commission's regulations, 52 Pa. Code § 5.81, allows the Commission or the presiding officer to order the consolidation of proceedings "involving a common question of law or fact." Both the First and Second Formal Complaints contain identical issues of law and fact, which, in order to further judicial economy and avoid needless duplication of litigation, justify consolidation.

6. The dispute in each Formal Complaint raises the same issues for the Service Location under Mr. Glenny's Account. Although Company records indicate that Ms. Baumia has identified herself on multiple occasions as being a resident of the Service Location as well as the spouse of Mr. Glenny, she is not listed as an authorized contact on the Account.

7. Mediator Rhoades and the Commission have significant discretion in deciding a Motion to Consolidate Proceedings. Consolidation of these proceedings will avoid: (i) the need to appoint a separate administrative law judge to preside over both Formal Complaints; (ii) participation by the parties in two separate proceedings on identical issues; and (iii) duplication of witnesses, discovery, testimony, and cross-examination. Moreover, consolidation of the Formal Complaints for hearing and decision will avoid the potential for inconsistent decisions due to separate treatment in different proceedings, which ultimately may require Commission resolution. Basic principles of judicial economy, the avoidance of needless duplication of litigation and a desire to save Commission, and the parties' resources, all support consolidation of these proceedings

**WHEREFORE**, for the foregoing reasons, FirstEnergy Pennsylvania Electric Company, Penelec Rate District, respectfully requests that its Motion to Consolidate the Formal Complaints filed by Matthew A. Glennly at Docket No. C-2024-3048841 and Michelle Baumia at Docket No. F-2024-3051139 be granted.

Respectfully submitted,



Margaret A. Morris, Esq.

Attorney ID No. 75048

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Dated: March 18, 2025

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