

May 22, 2025

**Via Electric Filing**

Matthew Homsher, Esquire  
Secretary  
PA Public Utility Commission  
P.O. Box 3265  
Harrisburg, PA 17015-3265

**Re: Docket No. C-2025-3054649  
Joseph Price v. FirstEnergy Pennsylvania Electric Company  
Answer and New Matter of FE PA (Penelec Rate District)**

Dear Secretary Homsher:

I, Joseph Price (Complainant), hereby submits my Response to the Answer and New Matter filed by FirstEnergy's Pennsylvania Electric Company (Penelec Rate District) in the above referenced proceeding.

A copy of the enclosed Answer and New Matter has been served to the Respondent through its attorney, Margret A Morris, Esquire, Reger Rizzo & Darnall LLP, in the manner indicated on the attached Certificate of Service.

Sincerely yours,

A handwritten signature in black ink, appearing to read "Joseph Price". The signature is fluid and cursive, with the first name "Joseph" and last name "Price" clearly distinguishable.

Joseph Price

**Re: Docket No. C-2025-3054649**  
**Joseph Price v. FirstEnergy Pennsylvania Electric Company**  
**Answer and New Matter of FE PA (Penelec Rate District)**

**Certificate of Service**

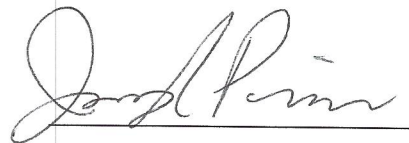
I hereby certify that a true and correct copy of the foregoing document has been served upon the following person(s) in the manner indicated, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

Via Electronic Mail

Margaret A. Morris, Esquire  
[mmorris@regerlaw.com](mailto:mmorris@regerlaw.com)

Conor O'Brien  
Paralegal  
[cobrien@regerlaw.com](mailto:cobrien@regerlaw.com)

Dated: May 22, 2025

A handwritten signature in black ink, appearing to read "Joseph Price", written over a horizontal line.

Joseph Price

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

JOSEPH PRICE

v.

FIRSTENERGY PENNSYLVANIA  
ELECTRIC COMPANY

Docket No. C-2025-3054649

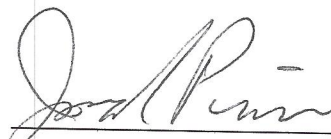
NOTICE TO PLEAD

Pursuant to 52 Pa. Code § 5.63, you are hereby notified that if you do not file a written response answering the enclosed New Matter of Joseph Price within (20) days from service of this notice, the facts set forth by Joseph Price in the New Matter may be deemed to be true, whereby requiring no other proof. All pleadings, such as a Reply to New Matter, must be filed with the Secretary of the Pennsylvania Public Utility Commission, with a copy served to Joseph Price, and where applicable the Administrative Law Judge presiding over the issue.

File by Mail or e-filing with:  
Matthew Homsher, Esquire  
Secretary  
Pennsylvania Public Utility Commission  
P.O. Box 3265  
Harrisburg, PA 17105-3265

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

Date May 22, 2025

  
\_\_\_\_\_  
Joseph Price

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

JOSEPH PRICE

v.

FIRSTENERGY PENNSYLVANIA  
ELECTRIC COMPANY

Docket No. C-2025-3054649

ANSWER AND NEW MATTER OF JOSEPH PRICE TO THE RESPONDANT FIRST ENERGY  
PENNSYLVANIA ELECTRIC COMPANY

Joseph Price (Complaint) pursuant to 52 Pa. Code § 5.62, hereby submits its Answer and New Matter to FirstEnergy Pennsylvania, Penelec Rate District, (respondent, FE PA, or Company) related to Docket No. C-2025-3054649. In response thereto, Complainant avers and represents as follows:

**Answers**

12. Admitted in part, Denied in Part: Admits that 66 Pa.C.S. § 1501 is a valid code denies the rest. Under the Public Utility Code, an electric utility in Pennsylvania has a legal duty to maintain safe, adequate and reasonable service and facilities and to make repairs, changes, and improvements that are necessary or proper for the accommodation, convenience, and safety of its patrons, employees, and the public. 66 Pa.C.S. § 1501)

12 a. Company failed to provide adequate and reasonable service to the Complainant due to volume of outages.

13. Admitted in part, Denied in Part: Admits that 66 Pa.C.S. § 1501 is a valid code denies the rest. Under the Public Utility Code, an electric utility in Pennsylvania has a legal duty to maintain safe, adequate and reasonable service and facilities and to make repairs, changes, and improvements that are necessary or proper for the accommodation, convenience, and safety of its patrons, employees, and the public. 66 Pa.C.S. § 1501).

13 a. Company was aware of the number of outages and failed to make improvements.

14. Admitted

15. Admitted

16. Admitted with the stipulation that if a mutual agreement is not made the case will proceed with litigation.

17. Admitted

### **New Matters**

18. Company either failed to disclose or disclosed in part requested information via “Right-to-Know” request. The Pennsylvania Right-to-Know Law (RTKL) guarantees public access to public records held by government agencies, including those of public utilities. I, Joseph Price, the complainant, made two attempts to obtain information on my outage history with the Company. In the first attempt (Exhibit A) all information was not made available upon request, see (Exhibit B). In the second attempt (Exhibit C) more information was released but not for the time frame requested, see (Exhibit D). The information that was provided was for years 2023 – 2024 and not for 2020 – 2024 that was requested see (Exhibits E and F). In Exhibit B there exists a date entry for year 2022. I believe this information does exist and it was withheld from discovery. I demand that the information withheld be released immediately and without hesitation. According to the code an EDC shall maintain a 5-year historical record of all known customer interruptions by category of interruption duration, including the time, duration and cause of each interruption. An EDC shall retain all records to support the reporting requirements under § 57.195 (relating to reporting requirements) for 5 year.

18 a. Company did not include all data in first request

18 b. Company included all data in second request but denied the existence of 2020 – 2022 data via phone call on 1/28/2025 with Debbie R. Carothers Liability Claims Rep III.

18 b 1. Request the Customer Service recording of the conversation for verification.

18 c. Request that Company release the remaining data pursuant to Exhibit C's request.

18 d. I request this matter be handled before any decision be made on moving this case to OALJ.

19. According to the article titled "**Penelec's 2021 Tree Trimming to Enhance Reliability**", tree trimming took place in summer 2021 for Circuit 00297-65. The data provided for the years 2023-2024 shows that this service in fact did not alleviate issues seen by the Complainant. Data from years 2021 – 2022 is vital in determining the effectiveness of the services both previously completed in 2021 and scheduled for 2025 on the issues the Complainant faces. See [https://www.firstenergycorp.com/newsroom/news\\_articles/penelec-2021-tree-trimming-to-enhance-reliability.html](https://www.firstenergycorp.com/newsroom/news_articles/penelec-2021-tree-trimming-to-enhance-reliability.html)

20. Company's reliability practices are inadequate and/or in violation of regulations. Under Public Utility Code, § 57.194. Distribution system reliability. (e) An EDC shall design and maintain procedures to achieve the reliability performance benchmarks and minimum performance standards established by the Commission.

20 a. Company fails to meet standard benchmarks according to the 2024 Electrical Reliability Report.

An EDC that consistently fails to achieve benchmark performance is considered out of compliance with the performance regulations and may require a robust corrective action plan, re-organization of management objectives, and/or regulatory penalties.

[https://www.puc.pa.gov/media/3123/draft-2024-electric-reliability-report-8-2024\\_final.pdf](https://www.puc.pa.gov/media/3123/draft-2024-electric-reliability-report-8-2024_final.pdf)

21. Company discriminates against the Complainant with the current design of Circuit 00297-65. The above-mentioned circuit and its upstream components represent a single point of failure. The company is known to make reliability and service improvements for certain customers. See Docket **DOCKET NO. A-2024-3049995 A-2025-3053163. Mid-Atlantic Interstate Transmission, LLC.**

"The proposed line is an approximately 3.5-mile single circuit, 115 kV transmission line to be located in Mount Joy, Germany and Union Townships in Adams County, Pennsylvania. The Project is needed to address a request for transmission service from FirstEnergy Pennsylvania Electric Company ("FE PA"), and **to improve electric service reliability for customers** located in Adams County, Pennsylvania."

See **Northern Portage Reliability Project –69-kV Electric Transmission Line Construction**

<https://www.firstenergycorp.com/content/dam/corporate/transmission/northern-portage/northern-portage-fact-sheet.pdf>

“More than 9,700 customers in the Aurora area are served by a single 69-kilovolt transmission line. If service to the line is disrupted, **there is the potential for a lengthy outage because no alternate power sources are available.** Sustained outages in both June and November of 2017 demonstrate the need for new electricity transmission infrastructure to **support reliable electric service.** The new line will improve reliability and resiliency, adding much-needed redundancy and operational flexibility for serving customers. The new line also will provide additional voltage support and help accommodate future growth and economic development.”

See **Met-Ed Completes Upgrades to Electric System in Monroe County**

[https://www.firstenergycorp.com/newsroom/news\\_articles/met-ed-completes-upgrades-to-electric-system-in-monroe-county.html](https://www.firstenergycorp.com/newsroom/news_articles/met-ed-completes-upgrades-to-electric-system-in-monroe-county.html)

““We've reconstructed three power lines to add a second source of electricity for the substation, **providing redundancy** that allows us to keep the lights on for many of our customers in Snydersville and Hamilton and Stroud Townships when our crews must make repairs or perform maintenance,” said Scott Wyman, president of FirstEnergy's Pennsylvania Operations. “This substation had been fed by a single power line that traverses dense forest, steep hillsides and swamps, increasing the potential for lengthy tree-related outages in hard-to-access areas.””

“Two devices enabled with supervisory control and data acquisition (SCADA) technology were installed in the substation, with two others placed on key spots along the line. SCADA conveys real-time information about voltage and electric current conditions to distribution system operators. Based on conditions, operators can control the devices remotely to quickly isolate damage and transfer customer load from one substation source to the other, **helping to keep the lights on** for customers when problems occur.”

According to **§ 1502. Discrimination in service.** No public utility shall, as to service, make or grant any unreasonable preference or advantage to any person, corporation, or municipal corporation, or subject any person, corporation, or municipal corporation to any unreasonable prejudice or disadvantage. No public utility shall establish or maintain any unreasonable difference as to service, either as between localities or as between classes of service, but this section does not prohibit the establishment of reasonable classifications of service.

- 21 a. Company improves reliability for some customers and not others.
- 21 b. Company holds preference over some customers.
- 21 c. Company gives an advantage to some customers.
- 21 d. Company maintains an unreasonable difference to service.

WHEREFORE, Complainant Joseph Price, requests that the Answer and New Matter filed by FirstEnergy Pennsylvania Electric Company, and its attorneys be denied in its entirety and request a judgment in my favor. In the alternative, Complainant requests that this matter be referred to the Office of Administrative Law Judge's Mediation Unit. If an agreement cannot be reached, I humbly request that the matter be returned to the Administrative Law Judge.

Date: May 22, 2025

Respectfully submitted,



Joseph Price  
186 Abby Road  
Falls PA, 18615  
(570) 406-7430  
jprice@shadow-llc.com

# EXHIBIT A

**Joe Price**

---

**From:** FE Customer Service <fecustomerservice@firstenergycorp.com>  
**Sent:** Monday, November 25, 2024 2:10 PM  
**To:** Joe Price  
**Subject:** Re: Right to Know #155643163

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Joseph Price;

Thank you for contacting us. We are happy to assist you. We have sent your request to the Claims Department. They will provide the requested information. This can take up to 30 days to be completed. We appreciate your patience.

Sincerely,

Amanda | Customer Service

If you are not satisfied with this response or have additional comments or questions, please reply to this email within five business days or call us Monday through Friday, between 8 a.m. and 6 p.m. If we do not hear from you within five business days, we will assume your question has been answered or your issue has been resolved. If you do not have an online account, we encourage you to register at [www.firstenergycorp.com/login](http://www.firstenergycorp.com/login) to receive text and email alerts, to enroll in eBill (Electronic Billing) to view your bill statements online, to analyze your usage and more. Thank you.

Operating Company	Phone Number
Ohio Edison	800-633-4766
Illuminating Company	800-589-3101
Toledo Edison	800-447-3333
Met-Ed	800-545-7741
Penelec	800-545-7741
Penn Power	800-720-3600
West Penn Power	800-686-0021
Jersey Central Power & Light	800-662-3115
Mon Power	800-686-0022

Potomac Edison

800-686-0011

On 23 November 2024 2:45 UTC, Joseph Price <jprice@shadow-llc.com> wrote:

<pre>

Form Name: Contact Us  
Submit Date: 11/22/2024 21:45:11  
Operating Company: PN01  
Topic: Customer Service  
Name: Joseph Price  
Email: jprice@shadow-llc.com  
Address Line 1: 186 Abby Road  
Address Line 2: null  
City: Falls  
State: PA  
Province: null  
Zip: 18615  
Country: null  
Phone: 5704067430  
Best Time: null  
Account Number: null  
Request Type: Power Outage  
Subject: Right to Know  
Text: Hello,

I'd like to file a Right to Know for power outages affecting my address 186 Abby Road Falls PA 18615 for the past 24 months. I would like dates, times, and duration as the criteria. I'm going to take this information and report it to every governing and authoritative body I can possibly reach out to. Your companies dedication to providing me reliable power is absolute garbage.

</pre>

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document in error and that any review, dissemination, distribution, or copying of this message is strictly prohibited. If you have received this communication in error, please notify us immediately, and delete the original message.

# EXHIBIT B

**Joe Price**

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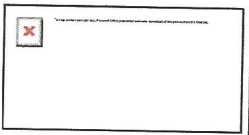
**From:** Hagerup, Carina <cbeebe@firstenergycorp.com>  
**Sent:** Monday, January 13, 2025 2:06 PM  
**To:** Joe Price  
**Subject:** RE: 24 month outage history

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Good afternoon,

Unfortunately I cannot provide you with that information as momentaries are not really tracked due to switching and upstream device operations. Quite often, a very short outage due to a normal recloser operation could prevent what would have been a much longer duration outage, so unless a device is malfunctioning, these are less of a concern.

Thanks,



**Carina Hagerup**  
Engineer II  
office: 5704857699 ()  
cbeebe@firstenergycorp.com  
88 Plaza Drive, Towanda, PA 18848 | mailstop: X-TOWA / Towanda

---

**From:** Joe Price <jprice@shadow-llc.com>  
**Sent:** Friday, January 10, 2025 3:38 PM  
**To:** Hagerup, Carina <cbeebe@firstenergycorp.com>  
**Subject:** [EXTERNAL] RE: 24 month outage history

External Sender, use caution with links/attachments. Click 'Report Message' in Outlook if suspicious.

Thank you for that clarification. I would like all of the unofficial outage records for the 2 year period as they may not be "sustained outages" for your record keeping but they do negatively affect my livelihood and access to reliable electricity.

Thank you,

Joe Price

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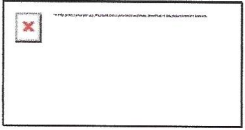
**From:** Hagerup, Carina <cbeebe@firstenergycorp.com>  
**Sent:** Friday, January 10, 2025 3:14 PM  
**To:** Joe Price <jprice@shadow-llc.com>  
**Subject:** RE: 24 month outage history

Good afternoon,

The outage on 11/23/24 overlapped with the one that started on 11/22/24 so in the review process it was determined to be one longer outage, not two separate outages. I did see an outage on 1/4/25 but since it was only

2 minutes long, it is not considered a sustained outage. It is standard procedure that anything under 5 minutes is considered a momentary incident rather than a sustained outage and is not provided on official outage records.

Thanks,



**Carina Hagerup**  
Engineer II  
office: 5704857699 ()  
[cbeebe@firstenergycorp.com](mailto:cbeebe@firstenergycorp.com)  
88 Plaza Drive, Towanda, PA 18848 | mailstop: X-TOWA / Towanda

**From:** Joe Price <[jprice@shadow-llc.com](mailto:jprice@shadow-llc.com)>  
**Sent:** Friday, January 10, 2025 3:09 PM  
**To:** Hagerup, Carina <[cbeebe@firstenergycorp.com](mailto:cbeebe@firstenergycorp.com)>  
**Subject:** [EXTERNAL] RE: 24 month outage history

External Sender, use caution with links/attachments. Click 'Report Message' in Outlook if suspicious.

Hello Carina,

It appears you are missing the outage on 11/23/2024. It was in your previous list. There was also an outage on or about 1/5.

**From:** Hagerup, Carina <[cbeebe@firstenergycorp.com](mailto:cbeebe@firstenergycorp.com)>  
**Sent:** Friday, January 10, 2025 3:03 PM  
**To:** Joe Price <[jprice@shadow-llc.com](mailto:jprice@shadow-llc.com)>  
**Subject:** RE: 24 month outage history

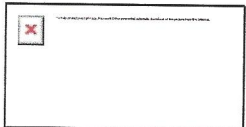
Good afternoon,

Here is an updated list for you. It looks like the new outage you experienced was a forced outage used to fix some extra equipment that wasn't originally repaired during the storm restoration but was damaged by the storm. If you have any further questions, please let me know.

Date/Time	Duration	Cause	Weather	No. Cust. Affected
12/27/2022 9:10:40 AM	11min	Forced Outage	Fair	810
2/7/2023 6:33:38 AM	1hr 53min	Unknown	Fair	809
2/17/2023 9:34:39 AM	4hr 25min	Unknown	Raining	67
3/14/2023 12:03:07 PM	3hrs 53min	Line Failure	Snow-ice with high winds	17
3/14/2023 8:06:34 PM	7hrs 7min	Trees Off ROW	Snow-ice	67
4/14/2023 9:37:40 PM	12hrs 54min	Trees Off ROW	Fair	17
4/15/2023 3:27:54 PM	13min	Equipment Failure	Fair	810
7/21/2023 5:01:18 PM	2hrs 21min	Trees Off ROW	Rain with Lightning	67
8/6/2023 4:07:48 PM	4hrs 35min	Unknown	Fair	67
9/3/2023 5:16:42 PM	8min	Line Failure	Fair	815
9/7/2023 4:20:41 PM	66hrs 21min	Trees Off ROW	Rain with Lightning	67
12/30/2023 5:14:33 AM	10hrs 51min	Trees Off ROW	Fair	599
2/11/2024 10:35:20 AM	20min	Line Failure	Fair	1616
6/26/2024 8:26:58 PM	4hrs 14min	Trees Off ROW	Rain with Lightning	68

7/29/2024 10:52:57 PM	12hrs 39min	Line Failure	Fair	16
8/20/2024 3:49:50 AM	5hrs 37min	Trees Off ROW	Fair	67
8/31/2024 3:00:09 PM	1hr 1min	Unknown	Fair	814
10/2/2024 8:02:28 AM	11min	Line Failure	Fair	814
11/13/2024 9:20:39 AM	3hrs 9min	Planned Outage	Fair	18
11/14/2024 8:44:13 AM	1hr 47min	Planned Outage	Fair	18
11/22/2024 11:46:24 AM	26hrs 16min	Ice	Snow-ice with high winds	749
11/26/2024 4:58:35 PM	2hrs 43min	Forced Outage	Fair	595

Thanks,



**Carina Hagerup**

Engineer II

office: 5704857699 ()

[cbeebe@firstenergycorp.com](mailto:cbeebe@firstenergycorp.com)

88 Plaza Drive, Towanda, PA 18848 | mailstop: X-TOWA / Towanda

**From:** Joe Price <[jprice@shadow-llc.com](mailto:jprice@shadow-llc.com)>  
**Sent:** Friday, January 10, 2025 9:34 AM  
**To:** Hagerup, Carina <[cbeebe@firstenergycorp.com](mailto:cbeebe@firstenergycorp.com)>  
**Subject:** [EXTERNAL] RE: 24 month outage history

External Sender, use caution with links/attachments. Click 'Report Message' in Outlook if suspicious.

Hello Carina,

Thank you for the below information. I know this is a late reply, but we experienced another power outage the same day or day after you sent this so I was waiting until end of year to see what else would happen. Can you please send me an updated list of outages to today 1/10/2025. Please let me know if you need anything else from me.

Thank you,

Joe Price

**From:** Hagerup, Carina <[cbeebe@firstenergycorp.com](mailto:cbeebe@firstenergycorp.com)>  
**Sent:** Wednesday, November 27, 2024 11:57 AM  
**To:** Joe Price <[jprice@shadow-llc.com](mailto:jprice@shadow-llc.com)>  
**Subject:** 24 month outage history

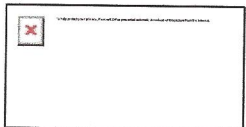
Good morning, Joseph,

I am Carina, a reliability engineer with Penelec, and I was told that you requested a list of your outages over the past 24 months. I have gone through the records and put together the table below detailing each sustained outage you experienced. The table contains the date and time of each event, the approximate duration, the known cause, the weather for that day, and the total number of customers affected by that outage. Please note that while I did include two outages that occurred this past week, the data has not yet gone through our review and approval process to ensure accuracy, and therefore cannot be considered official data. I have highlighted this information in red to indicate this.

If you have any questions or want any clarifications, please let me know and I will be happy to assist. Hope you have a great holiday weekend.

Date/Time	Duration	Cause	Weather	No. Cust. Affected
12/27/2022 9:10:40 AM	11min	Forced Outage	Fair	810
2/7/2023 6:33:38 AM	1hr 53min	Unknown	Fair	809
2/17/2023 9:34:39 AM	4hr 25min	Unknown	Raining	67
3/14/2023 12:03:07 PM	3hrs 53min	Line Failure	Snow-ice with high winds	17
3/14/2023 8:06:34 PM	7hrs 7min	Trees Off ROW	Snow-ice	67
4/14/2023 9:37:40 PM	12hrs 54min	Trees Off ROW	Fair	17
4/15/2023 3:27:54 PM	13min	Equipment Failure	Fair	810
7/21/2023 5:01:18 PM	2hrs 21min	Trees Off ROW	Rain with Lightning	67
8/6/2023 4:07:48 PM	4hrs 35min	Unknown	Fair	67
9/3/2023 5:16:42 PM	8min	Line Failure	Fair	815
9/7/2023 4:20:41 PM	66hrs 21min	Trees Off ROW	Rain with Lightning	67
12/30/2023 5:14:33 AM	10hrs 51min	Trees Off ROW	Fair	599
2/11/2024 10:35:20 AM	20min	Line Failure	Fair	1616
6/26/2024 8:26:58 PM	4hrs 14min	Trees Off ROW	Rain with Lightning	68
7/29/2024 10:52:57 PM	12hrs 39min	Line Failure	Fair	16
8/20/2024 3:49:50 AM	5hrs 37min	Trees Off ROW	Fair	67
8/31/2024 3:00:09 PM	1hr 1min	Unknown	Fair	814
10/2/2024 8:02:28 AM	11min	Line Failure	Fair	814
11/13/2024 9:20:39 AM	3hrs 9min	Planned Outage	Fair	18
11/14/2024 8:44:13 AM	1hr 47min	Planned Outage	Fair	18
11/22/2024 11:46:24 AM	25hrs 57min	Unknown	Snow	738
11/23/2024 1:00:48 PM	6hrs 37min	Forced Outage	Snow	590

Thanks,



**Carina Hagerup**

Engineer II

office: 5704857699 ()

[cbeebe@firstenergycorp.com](mailto:cbeebe@firstenergycorp.com)

88 Plaza Drive, Towanda, PA 18848 | mailstop: X-TOWA / Towanda

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# EXHIBIT C

**Joe Price**

---

**From:** FE Customer Service <fecustomerservice@firstenergycorp.com>  
**Sent:** Monday, January 27, 2025 7:53 AM  
**To:** Joe Price  
**Subject:** Re: Right to know #191869498

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Joseph Price;

Thank you for utilizing our website. We are happy to assist you. We have forwarded your request to the appropriate department for review. Please refer to notification number 358967332 for any future inquiries regarding this request. A representative will contact you by phone or mail within 10 business days regarding your request.

Sincerely,

Jaimie | Customer Service

If you are not satisfied with this response or have additional comments or questions, please reply to this email within five business days or call us Monday through Friday, between 8 a.m. and 6 p.m. If we do not hear from you within five business days, we will assume your question has been answered or your issue has been resolved. If you do not have an online account, we encourage you to register at [www.firstenergycorp.com/login](http://www.firstenergycorp.com/login) to receive text and email alerts, to enroll in eBill (Electronic Billing) to view your bill statements online, to analyze your usage and more. Thank you.

Operating Company	Phone Number
Ohio Edison	800-633-4766
Illuminating Company	800-589-3101
Toledo Edison	800-447-3333
Met-Ed	800-545-7741
Penelec	800-545-7741
Penn Power	800-720-3600
West Penn Power	800-686-0021
Jersey Central Power & Light	800-662-3115
Mon Power	800-686-0022

Potomac Edison

800-686-0011

On 23 January 2025 16:54 UTC, Joseph Price <jprice@shadow-llc.com> wrote:

<pre>

Form Name: Contact Us

Submit Date: 01/23/2025 11:54:48

Operating Company: PN01

Topic: Customer Service

Name: Joseph Price

Email: jprice@shadow-llc.com

Address Line 1: 186 Abby Road

Address Line 2: null

City: Falls

State: PA

Province: null

Zip: 18615

Country: null

Phone: 5704067430

Best Time: null

Account Number: null

Request Type: Power Outage

Subject: Right to know

Text: I would like a detailed outage (including full outages / loss of leg / brown outs and any other type of issue that might affect the power coming into my residence) report from 1/2020 - 1/2024 INCLUDING sub 5 minute outages.

</pre>

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# EXHIBIT D

**Joe Price**

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**From:** Carothers, Debbie R <dcarothers@firstenergycorp.com>  
**Sent:** Thursday, May 15, 2025 10:36 AM  
**To:** Joe Price  
**Cc:** Morris, Margaret A (Giesler, Tori)  
**Subject:** RE: Penelec Claim PL318297

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Mr. Price,

This matter is being handled by Margaret Morris, and she can be contacted directly at 215-495-6524.

Sincerely,

**Debbie R. Carothers**

Liability Claims Rep III  
office: 814-949-4626 (470-4626) | cell: 814-330-4065  
[dcarothers@firstenergycorp.com](mailto:dcarothers@firstenergycorp.com)  
405 West Plank Road, Altoona, PA 16602 | mailstop: G-ALTO / Altoona

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**From:** Joe Price <jprice@shadow-llc.com>  
**Sent:** Tuesday, May 13, 2025 9:53 AM  
**To:** Carothers, Debbie R <dcarothers@firstenergycorp.com>  
**Subject:** [EXTERNAL] RE: Penelec Claim PL318297

External Sender, use caution with links/attachments. Click 'Report Message' in Outlook if suspicious.

Hi Debbie,

I was just wondering if you can tell me if my ticket is still active or not. Also my original request was for 4 years but I only received 2 years of data. Why was that?

Thanks,

Joe

**From:** Carothers, Debbie R <dcarothers@firstenergycorp.com>  
**Sent:** Tuesday, February 11, 2025 2:20 PM

To: Joe Price <[jprice@shadow-llc.com](mailto:jprice@shadow-llc.com)>

Subject: RE: Penelec Claim PL318297

Mr. Price,

I forwarded you letter to our engineering department.

Someone from the reliability section of the engineering department will be reaching out to you.

The ticket number I found was 359058883.

Sincerely,

**Debbie R. Carothers**

Liability Claims Rep III

office: 814-949-4626 (470-4626) | cell: 814-330-4065

[dcarothers@firstenergycorp.com](mailto:dcarothers@firstenergycorp.com)

405 West Plank Road, Altoona, PA 16602 | mailstop: G-ALTO / Altoona

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**From:** Joe Price <[jprice@shadow-llc.com](mailto:jprice@shadow-llc.com)>

**Sent:** Tuesday, February 11, 2025 12:20 PM

**To:** Carothers, Debbie R <[dcarothers@firstenergycorp.com](mailto:dcarothers@firstenergycorp.com)>

**Subject:** [EXTERNAL] RE: Penelec Claim PL318297

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I called the number you gave me and spoke to another customer service rep who said there is no such thing as a reliability department. He opened some sort of ticket. I'd appreciate it if you would forward the attached letter to the appropriate persons for such a complaint and I'd like a ticket number associated with it.

Thank you,

Joe Price

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**From:** Carothers, Debbie R <[dcarothers@firstenergycorp.com](mailto:dcarothers@firstenergycorp.com)>

**Sent:** Wednesday, January 29, 2025 2:01 PM

**To:** Joe Price <[jprice@shadow-llc.com](mailto:jprice@shadow-llc.com)>

**Subject:** RE: Penelec Claim PL318297

Mr. Price,

I spoke to my supervisor regarding the letter that you sent, and she advised me to have you call the Penelec Customer Service number at 1-800-545-7741 and inform them that you are having reliability issues and would like to speak to someone in the reliability department.

Once you have contacted someone in that department, you can provide them with your letter.

That way, we can be certain it gets to the correct person.

Sincerely,

**Debbie R. Carothers**

Liability Claims Rep III  
office: 814-949-4626 (470-4626) | cell: 814-330-4065  
[dcarothers@firstenergycorp.com](mailto:dcarothers@firstenergycorp.com)  
405 West Plank Road, Altoona, PA 16602 | mailstop: G-ALTO / Altoona

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\*\*\*\*\*

**From:** Joe Price <[jprice@shadow-llc.com](mailto:jprice@shadow-llc.com)>  
**Sent:** Wednesday, January 29, 2025 9:20 AM  
**To:** Carothers, Debbie R <[dcarothers@firstenergycorp.com](mailto:dcarothers@firstenergycorp.com)>  
**Subject:** [EXTERNAL] RE: Penelec Claim PL318297

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Hi Debbie,

You didn't respond to my inquiry about submitting a complaint letter so I'm attaching it here. Please make sure it reaches the appropriate individuals responsible for such matters. I will follow up in a few days.

Thank you,

Joe Price

**From:** Joe Price  
**Sent:** Tuesday, January 28, 2025 12:37 PM  
**To:** Carothers, Debbie R <[dcarothers@firstenergycorp.com](mailto:dcarothers@firstenergycorp.com)>  
**Subject:** RE: Penelec Claim PL318297

Thank you for all the information you provided. I didn't know Right to Know requests were billed? Like I stated previously I have a letter I need to submit about my outages. Whom do I send it to?

Thank you,

Joe Price

**From:** Carothers, Debbie R <[dcarothers@firstenergycorp.com](mailto:dcarothers@firstenergycorp.com)>  
**Sent:** Tuesday, January 28, 2025 11:50 AM  
**To:** Joe Price <[jprice@shadow-llc.com](mailto:jprice@shadow-llc.com)>  
**Subject:** RE: Penelec Claim PL318297

Hi Joe,

I made that work request non-billable/not a claim.

Thank you for letting me know.

Sincerely,

**Debbie R. Carothers**

Liability Claims Rep III  
office: 814-949-4626 (470-4626) | cell: 814-330-4065  
[dcarothers@firstenergycorp.com](mailto:dcarothers@firstenergycorp.com)  
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**From:** Joe Price <[jprice@shadow-llc.com](mailto:jprice@shadow-llc.com)>  
**Sent:** Tuesday, January 28, 2025 11:33 AM  
**To:** Carothers, Debbie R <[dcarothers@firstenergycorp.com](mailto:dcarothers@firstenergycorp.com)>  
**Subject:** [EXTERNAL] RE: Penelec Claim PL318297

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Debbie,

I have prepared a letter in response to this information. I want to make sure it reaches the right people. Please let me know who to send it to. As much as I appreciate the letter you included it did not help de-escalate the situation at all. I look forward to your response.

Joe Price

**From:** Carothers, Debbie R <[dcarothers@firstenergycorp.com](mailto:dcarothers@firstenergycorp.com)>  
**Sent:** Tuesday, January 28, 2025 11:06 AM  
**To:** Joe Price <[jprice@shadow-llc.com](mailto:jprice@shadow-llc.com)>  
**Subject:** FW: Penelec Claim PL318297

**From:** Carothers, Debbie R  
**Sent:** Tuesday, January 28, 2025, 11:01 AM  
**To:** [mprice0703@gmail.com](mailto:mprice0703@gmail.com)  
**Subject:** Penelec Claim PL318297

Mr. Price,

Per your request, I have attached the outage report for both 2023 and 2024.

I also reached out to the district supervisor to make him aware of the issues you have been having.

If you have any questions, please contact me.

Sincerely,

**Debbie R. Carothers**

Liability Claims Rep III  
office: 814-949-4626 (470-4626) | cell: 814-330-4065  
[dcarothers@firstenergycorp.com](mailto:dcarothers@firstenergycorp.com)  
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# EXHIBIT E

Exhibit E

Date	Length of Time	Reason
2/3/2023 8:57:18 PM	6 Second - Blink	Equipment Failure - Recloser Operation
2/3/2023 8:57:24 PM	6 Second - Blink	Equipment Failure - Recloser Operation
2/7/2023 6:33:38 AM	1 Hour, 51 Min, 55 Sec	Equipment Failure - Recloser Operation
2/7/2023 8:25:33 AM	1 Hour, 51 Min, 55 Sec	Equipment Failure - Recloser Operation
2/14/2023 4:07:05 PM	2 Min, 16 Sec - Blink	Equipment Failure - Recloser Operation
2/14/2023 4:09:21 PM	2 Min, 16 Sec - Blink	Equipment Failure - Recloser Operation
2/17/2023 9:34:39 AM	4 Hours, 10 Min, 50 Sec	Equipment Failure - Blown Fuse - Raining
2/17/2023 1:45:29 PM	4 Hours, 10 Min, 50 Sec	Equipment Failure - Blown Fuse - Raining
3/14/2023 12:03:07 PM	3 Hours, 55 Min, 33 Sec	Line Failure - Snow/Ice with High Winds
3/14/2023 3:58:40 PM	3 Hours, 55 Min, 33 Sec	Line Failure - Snow/Ice with High Winds
3/14/2023 8:06:34 PM	5 Hours, 8 Min, 58 Sec	Tree off Right-of-Way - Snow/Ice
3/15/2023 1:15:32 AM	5 Hours, 8 Min, 58 Sec	Tree off Right-of-Way - Snow/Ice
3/29/2023 9:36:43 PM	6 Second - Blink	Blink
3/29/2023 9:36:50 PM	6 Second - Blink	Blink
4/14/2023 9:37:40 PM	12 Hours, 59 Min, 8 Sec	Tree off Right-of-Way
4/15/2023 10:36:48 AM	12 Hours, 59 Min, 8 Sec	Tree off Right-of-Way
4/15/2023 3:27:54 PM	13 Min, 24 Sec	Equipment Failure of a Insulator
4/15/2023 3:41:18 PM	13 Min, 24 Sec	Equipment Failure of a Insulator
6/25/2023 4:09:22 PM	3 Min, 28 Sec	Equipment Failure - Recloser Operation
6/25/2023 4:12:50 PM	3 Min, 28 Sec	Equipment Failure - Recloser Operation
7/4/2023 1:09:46 AM	4 Second - Blink	Blink
7/4/2023 1:09:50 AM	4 Second - Blink	Blink
7/21/2023 5:01:18 PM	2 Hours, 9 Min, 54 Sec	Tree off Right-of-Way - Rain with Lightning
7/21/2023 7:11:12 PM	2 Hours, 9 Min, 54 Sec	Tree off Right-of-Way - Rain with Lightning
7/30/2023 7:36:39 AM	5 Second - Blink	Blink
7/30/2023 7:36:44 AM	5 Second - Blink	Blink
8/6/2023 4:07:48 PM	4 Hours, 33 Min, 8 Sec	Tree off Right-of-Way
8/6/2023 8:40:56 PM	4 Hours, 33 Min, 8 Sec	Tree off Right-of-Way
8/30/2023 3:24:18 AM	1 Min, 43 Sec - Blink	Equipment Failure - Recloser Operation
8/30/2023 3:26:01 AM	1 Min, 43 Sec - Blink	Equipment Failure - Recloser Operation
8/30/2023 3:26:47 AM	1 Min, 17 Sec - Blink	Equipment Failure - Recloser Operation
8/30/2023 3:28:04 AM	1 Min, 17 Sec - Blink	Equipment Failure - Recloser Operation
9/3/2023 5:12:15 PM	7 Second - Blink	Line Failure
9/3/2023 5:12:23 PM	7 Second - Blink	Line Failure
9/3/2023 5:12:24 PM	7 Second - Blink	Line Failure
9/3/2023 5:12:35 PM	11 Second - Blink	Line Failure - Continued
9/3/2023 5:12:40 PM	11 Second - Blink	Line Failure - Continued
9/3/2023 5:12:48 PM	8 Second - Blink	Line Failure - Continued
9/3/2023 5:14:26 PM	8 Second - Blink	Line Failure - Continued
9/3/2023 5:14:44 PM	18 Second - Blink	Line Failure - Continued
9/3/2023 5:14:53 PM	18 Second - Blink	Line Failure - Continued
9/3/2023 5:15:15 PM	22 Second - Blink	Line Failure - Continued
9/3/2023 5:15:15 PM	22 Second - Blink	Line Failure - Continued

9/3/2023 5:15:33 PM		
9/3/2023 5:15:53 PM	20 Second - Blink	Line Failure - Continued
9/3/2023 5:16:02 PM		
9/3/2023 5:16:24 PM	22 Second - Blink	Line Failure - Continued
9/3/2023 5:16:42 PM		
9/3/2023 5:19:29 PM	2 Min, 47 Sec - Blink	Line Failure - Continued
9/7/2023 4:20:41 PM		
9/10/2023 11:18:29 AM	2 Days, 18 Hours, 57 Min, 48 Sec	Tree off Right-of Way - Rain with Lightning
12/30/2023 5:14:33 AM		
12/30/2023 4:08:00 PM	10 Hours, 53 Min, 27 Sec	Tree off Right-of-Way

# EXHIBIT F

Exhibit F

Date	Length of Time	Reason
1/12/2024 8:21:41 PM		
1/12/2024 8:21:46 PM	5 Second - Blink	Recloser Operation
1/25/2024 4:31:24 PM		
1/25/2024 4:31:29 PM	5 Second - Blink	Equipment Failure of an Arrestor
1/25/2024 4:31:32 PM		
1/25/2024 4:31:36 PM	4 Second - Blink	Equipment Failure of an Arrestor - Continued
1/25/2024 4:31:52 PM		
1/25/2024 4:34:22 PM	2 Min, 30 Sec - Blink	Equipment Failure of an Arrestor - Continued
1/28/2024 11:54:50 PM		
1/28/2024 11:56:16 PM	1 Min, 26 Sec - Blink	Recloser Operation
2/11/2024 10:09:34 AM		
2/11/2024 10:09:55 AM	21 Sec - Blink	Line Failure
2/11/2024 10:26:45 AM		
2/11/2024 10:29:00 AM	2 Min, 15 Second - Blink	Line Failure - Continued
2/11/2024 10:35:20 AM		
2/11/2024 1:46:13 PM	3 Hours, 10 Min, 53 Sec	Line Failure - Continued
2/25/2024 8:02:22 AM		
2/25/2024 8:02:28 AM	6 Second - Blink	Reclosure Operation
5/3/2024 6:44:49 AM		
5/3/2024 6:45:03 AM	14 Second - Blink	Recloser Operation
5/18/2024 10:22:06 AM		
5/18/2024 10:22:20 AM	14 Second - Blink	Blink - Unknown
5/23/2024 8:23:33 AM		
5/23/2024 8:25:55 AM	2 Min, 22 Sec - Blink	Recloser Operation
6/26/2024 8:26:58 PM		
6/27/2024 12:40:38 AM	4 Hours, 13 Min, 50 Sec	Tree off Right-of-Way - Rain with Lightning
6/28/2024 1:02:09 PM		
6/28/2024 1:03:38 PM	1 Min, 29 Sec - Blink	Recloser Operation
7/10/2024 10:17:05 PM		
7/10/2024 10:21:05 PM	4 Min - Blink	Recloser Operation - Rain with High Winds
7/15/2024 7:16:22 PM		
7/15/2024 7:16:26 PM	4 Second - Blink	Recloser Operation
7/15/2024 7:16:37 PM		
7/15/2024 7:16:41 PM	4 Second - Blink	Recloser Operation
7/29/2024 10:52:57 PM		
7/30/2024 11:36:16 AM	12 Hours, 43 Min, 19 Sec	Line Failure
8/2/2024 2:26:43 PM		
8/2/2024 2:28:13 PM	1 Min, 30 Sec - Blink	Recloser Operation
8/20/2024 3:49:50 AM		
8/20/2024 9:27:40 AM	5 Hours, 37 Min, 50 Sec	Tree off Right-of-Way
8/31/2024 2:55:14 PM		
8/31/2024 2:59:11 PM	3 Min, 57 Sec - Blink	Recloser Operation
8/31/2024 3:00:09 PM		

8/31/2024 3:55:36 PM	55 Min, 27 Sec - Blink	Unknown
10/2/2024 8:02:28 AM		
10/2/2024 8:13:50 AM	11 Min, 22 Sec - Blink	Line Failure
10/2/2024 8:15:21 AM		
10/2/2024 8:16:08 AM	47 Sec - Blink	Line Failure - Continued
10/19/2024 1:53:07 PM		
10/19/2024 1:53:12 PM	5 Second - Blink	Recloser Operation
11/13/2024 9:20:39 AM		
11/13/2024 12:31:30 PM	3 Hours, 10 Min, 51 Sec	Planned Outage
11/14/2024 8:44:13 AM		
11/14/2024 10:31:18 AM	1 Hour, 47 Min, 5 Sec	Planned Outage
11/22/2024 10:42:08 AM		
11/22/2024 10:44:08 AM	2 Min - Blink	Recloser Operations
11/22/2024 11:46:24 AM		
11/23/2024 9:42:24 AM	21 Hours, 56 Min, 20 Sec	Equipment Failure of the Crossarm Due to Snow
11/23/2024 1:00:48 PM		
11/23/2024 2:02:17 PM	1 Hour, 1 Min, 29 Sec	Equipment Failure - Continued from 11/22/2024
11/26/2024 4:58:35 PM		
11/26/2024 7:29:25 PM	2 Hours, 30 Min, 50 Sec	Forced Outage