

July 11, 2025

Via Electronic Filing

Matthew Homsher, Esquire
Secretary
PA Public Utility Commission
P.O. Box 3265
Harrisburg, PA 17105-3265

Re: Docket No. F-2025-3055477
Josie Channell v. FirstEnergy Pennsylvania Electric Company
Motion to File Answer *Nunc Pro Tunc*

Dear Secretary Homsher:

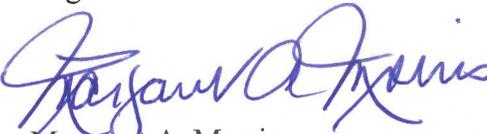
Attached for filing is the Motion of FirstEnergy Pennsylvania Electric Company (Met-Ed Rate District) to file its responsive pleading *nunc pro tunc* in the above-referenced proceeding.

As indicated on the Certificate of Service, a copy of the Motion has been provided to the Complainant in the manner indicated.

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: Tori Giesler, Esquire, FirstEnergy Service Company [w/encls.]
Josie Channell [w/encls.]

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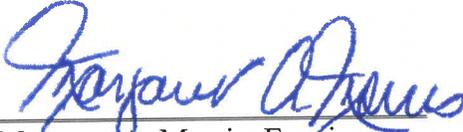
CERTIFICATE OF SERVICE

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

Josie Channell
josieferguson96@gmail.com

Dated: July 11, 2025


Margaret A. Morris, Esquire

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

JOSIE CHANNELL

v.

FIRSTENERGY PENNSYLVANIA ELECTRIC
COMPANY

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Docket No. F-2025-3055477

NOTICE TO PLEAD

Pursuant to 52 Pa. Code §§ 5.101 and 5.62(c), you are hereby notified that if you do not file a written response denying or correcting the enclosed Motion of FirstEnergy Pennsylvania Electric Company within twenty (20) days from service of this notice, a decision may be rendered against you. All pleadings, such as a Reply to FirstEnergy Pennsylvania Electric Company's Motion, 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.

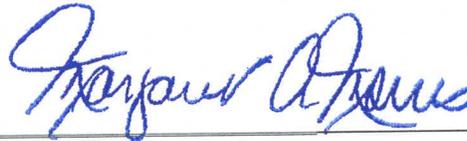
File by Mail or e-filing with:

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

Date: July 11, 2025



Margaret A. Morris, Esquire
Attorney ID No. 75048
Reger Rizzo & Darnall LLP
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2929 Arch Street
Philadelphia, PA 19104
(215) 495-6524 (tel.)
mmorris@regerlaw.com

*Counsel for FirstEnergy Pennsylvania Electric
Company (Met-Ed Rate District)*

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

| | | |
|-----------------------------------|---|---------------------------|
| JOSIE CHANNELL | : | |
| | : | |
| v. | : | Docket No. F-2025-3055477 |
| | : | |
| FIRSTENERGY PENNSYLVANIA ELECTRIC | : | |
| COMPANY | : | |

**MOTION OF FIRSTENERGY PENNSYLVANIA ELECTRIC COMPANY
TO FILE ANSWER AND NEW MATTER NUNC PRO TUNC**

FirstEnergy Pennsylvania Electric Company, Met-Ed Rate District, (Respondent, FE PA, or Company), by and through its attorneys, Reger Rizzo & Darnall LLP, pursuant to 52 Pa. Code §§ 1.2 and 5.62, respectfully petitions this Honorable Commission to accept the attached Answer and New Matter for filing *nunc pro tunc*.

1. On May 30, 2025, Josie Channell (Complainant) filed a Formal Complaint against the Company with the Pennsylvania Public Utility Commission.

2. Pursuant to 52. Pa. Code § 5.61, Respondent’s responsive pleading was due for filing on or before June 20, 2025.

3. Due to an administrative-related oversight, the Company is filing its Answer and New Matter beyond the June 20, 2025, due date.

4. On July 7, 2025, the undersigning counsel spoke with the Complainant to discuss resolution of the Complaint. The Complainant agreed to contact the Company to apply for

service and to be available for a call from the Dollar Energy Fund (DEF) to determine eligibility for the Company's low-income program. Unfortunately, she did not apply and was not available for the DEF. Counsel has not been successful in seeking the Complainant's position on the instant Motion.

5. The Company respectfully requests that this Honorable Commission accept the filing of its Answer *nunc pro tunc*.

6. 52 Pa. Code § 1.1 *et seq.* govern that rules of administrative practice and procedure before the Public Utility Commission (PUC).

7. 52 Pa. Code § 1.2 states that the procedural rules of Chapter 52 shall be liberally construed to secure the just, speedy, and inexpensive determination of every action or proceeding to which it is applicable.

8. Furthermore, the Pennsylvania Commonwealth Court has held that the Commission has the authority to waive procedural defects when they do not affect the substantive rights of the parties. *Info. Connections, Inc. v. Pennsylvania Public Utility Commission*, 630 A. 2d 498 (Pa. Cmwlth. 1993).

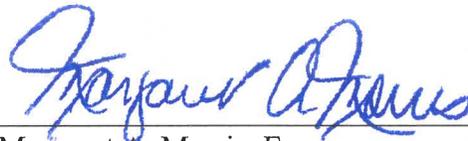
9. The Company respectfully submits that the late filing of its Answer was due to an administrative oversight.

10. More importantly, acceptance of the Answer and New Matter *nunc pro tunc* does not affect the substantive rights of the Complainant in this matter. The Answer and New Matter does not contain any information that was not already expressed to the Complainant.

11. Accordingly, the Company respectfully requests that its Answer and New Matter be accepted for filing *nunc pro tunc* so that this matter can be decided on the merits.

WHEREFORE, Respondent, FirstEnergy Pennsylvania Electric Company, respectfully requests that its Answer be accepted for filing *nunc pro tunc*.

Respectfully submitted,



Margaret A. Morris, Esq.
Attorney ID No. 75048
Reger Rizzo & Darnall LLP
Cira Centre, 13th Floor
2929 Arch Street
Philadelphia, PA 19104
(215) 495-6524 tel.
mmorris@regerlaw.com

Date: July 11, 2025

*Counsel for FirstEnergy Pennsylvania Electric
Company (Met-Ed Rate District)*