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July 29, 2025

Via Electronic Filing

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

**Re: Docket Nos. C-2025-3055994 and C-2025-3056084
David A. Hughes v. FirstEnergy Pennsylvania Electric Company
Motion to Consolidate of FE PA (West Penn Rate District)**

Dear Secretary Homsher:

Attached for filing is the Motion of FirstEnergy Pennsylvania Electric Company (West Penn Rate District) to consolidate the Formal Complaints of David A. Hughes at Docket Nos. C-2025-3055994 and C-2025-3056084.

A copy of the attached Motion to Consolidate 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: Tori Giesler, Esquire, FirstEnergy Service Company [w/encls.]
David A. Hughes [w/encls.]

**Re: Docket Nos. C-2025-3055994 and C-2025-3056084
David A. Hughes v. FirstEnergy Pennsylvania Electric Company
Motion to Consolidate of FE PA (West Penn 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

David A. Hughes
dave16782001@yahoo.com



Dated: July 29, 2025

Margaret A. Morris, Esquire

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

DAVID A. HUGHES

v.

FIRSTENERGY PENNSYLVANIA ELECTRIC
COMPANY

:
:
:
:
:
:
:

Docket Nos. C-2025-3055994
C-2025-3056084

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:

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
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Date: July 29, 2025



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*Counsel for FirstEnergy Pennsylvania Electric
Company (West Penn Rate District)*

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

DAVID A. HUGHES	:	
	:	
v.	:	Docket Nos. C-2025-3055994
	:	C-2025-3056084
FIRSTENERGY PENNSYLVANIA	:	
ELECTRIC COMPANY	:	

**MOTION OF FIRSTENERGY PENNSYLVANIA ELECTRIC COMPANY TO
CONSOLIDATE FORMAL COMPLAINTS FILED BY DAVID A. HUGHES**

FirstEnergy Pennsylvania Electric Company, West Penn Rate District, (Respondent, FE PA, or Company), by and through its attorneys, Reger Rizzo & Darnall LLP, hereby submits its Motion to Consolidate the Formal Complaints of David A. Hughes (Complainant) 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 June 30, 2025, Complainant filed a Formal Complaint with the Commission at Docket No. C-2025-3055994 (First Complaint) regarding service to 417 Kennedy Lane, Hopwood, Pennsylvania (Service Location) under Account No. 100124940501 (Account) and checked the boxes on the formal complaint form indicating that the utility is threatening to shut off service or has already shut off service and requesting a Payment Arrangement (PAR).

2. On July 3, 2025, Complainant filed a Formal Complaint with the Commission at Docket No. C-2025-3056084 (Second Complaint) regarding service to the Service Location under the Account and checked the boxes on the formal complaint form indicating that the utility

is threatening to shut off service or has already shut off service, incorrect charges on his bill, and requesting a PAR.

3. On July 21, 2025, pursuant to 52 Pa. Code § 5.62, the Company filed its responsive Answer to the First Complaint and on July 23, 2025, filed its responsive Answer to the Second Complaint. In both Answers, the Company admitted to issuing a 10-day termination notice on May 21, 2025, but otherwise denied the material allegations therein.

II. CONSOLIDATION

4. 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 Complaints contain identical issues of law and fact, which, in order to further judicial economy and avoid needless duplication of litigation, justify consolidation.

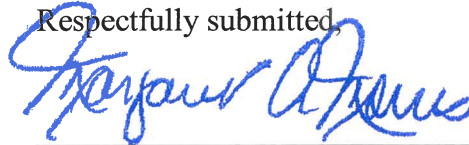
5. The First and Second Complaints raise similar issues for the Service Location under the Account. The Complainant alleges that the Company is threatening to shut off service or has already shut off service and requests a PAR that he can afford.

6. The Commission has 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, respectfully requests that its Motion to Consolidate the Formal Complaints filed by David Hughes at Docket Nos. C-2025-3055994 and C-2025-3056084 be granted.

Respectfully submitted,



Dated: July 29, 2025

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