

# Morgan Lewis

**Catherine G. Vasudevan**

catherine.vasudevan@morganlewis.com

October 28, 2025

**Via E-Filing**

Matthew L. Homsher, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street  
Harrisburg, PA 17120

**Re: Joint Application of FirstLight Fiber, Inc. and FirstLight Networks, LLC for Approval of a *Pro Forma* Assignment of Certain Assets from FirstLight Fiber, Inc. to FirstLight Networks, LLC**

Dear Secretary Homsher:

On behalf of FirstLight Fiber, Inc. and FirstLight Networks, LLC (together, the "Applicants"), enclosed for electronic filing with the Commission the above-referenced Joint Application. The filing fee in the amount of \$350.00 will be remitted online by credit card with the submission of the Joint Application.

We would appreciate acknowledgement of receipt and acceptance of this filing. Should you have any questions concerning this submission, please contact my colleague Patricia Cave at [patricia.cave@morganlewis.com](mailto:patricia.cave@morganlewis.com).

Respectfully submitted,

/s/ Catherine G. Vasudevan



Catherine G. Vasudevan  
PA I.D. No. 210254

*Counsel for Applicants*

cc: Certificate of Service

**Morgan, Lewis & Bockius LLP**

2222 Market Street  
Philadelphia, PA 19103-3007  
United States

 +1.215.963.5000  
 +1.215.963.5001

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Joint Application of :  
 :  
**FirstLight Fiber, Inc.** :  
 :  
and :  
 : Docket No. \_\_\_\_\_  
**FirstLight Networks, LLC** :  
 :  
for Approval of a *Pro Forma* Assignment of :  
Certain Assets from FirstLight Fiber, Inc. to :  
FirstLight Networks, LLC :

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**JOINT APPLICATION FOR APPROVAL OF A GENERAL RULE TRANSACTION**

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**TO THE HONORABLE PENNSYLVANIA PUBLIC UTILITY COMMISSION:**

THIS JOINT APPLICATION (“Application”) is filed as a General Rule Transaction pursuant to 52 Pa. Code § 63.324 by FirstLight Fiber, Inc. (“FLF”) and its indirect subsidiary FirstLight Networks, LLC (“FirstLight Networks”) (together, the “Applicants”) for approval from the Pennsylvania Public Utility Commission (the “Commission”), pursuant to 66 Pa. Cons. Stat. §§ 1102(a)(3), of a *pro forma* assignment of certain assets from FLF to FirstLight Networks (the “*Pro Forma* Asset Transfer”). This Application relates to FLF’s business plan to implement an internal restructuring which will organize, and obtain financing to support, certain of its operations into FirstLight Networks.

As described below, the *Pro Forma* Asset Transfer will appropriately distribute assets between the entities participating in the financing arrangements and those that are not.<sup>1</sup> The *Pro Forma* Asset Transfer will be seamless to affected customers with respect to the services that

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<sup>1</sup> FirstLight Networks is separately submitting an Abbreviated Securities Certificate regarding the financing arrangements.

those customers receive and the rates and terms of those services. The *Pro Forma* Asset Transfer will not cause confusion or disruption to customers since FLF and FirstLight Networks will market and perform their respective services under the “FirstLight” brand with which customers are familiar, will maintain the same rates and terms of service, and will use the same customer service, technical, operational and managerial personnel.

In support of this filing, Applicants provide the following information:

**I. DESCRIPTION OF THE APPLICANTS**

FLF is a Delaware corporation and FirstLight Networks is a Delaware limited liability company, each with a principal office located at 12 Metro Park Road, Albany, NY 12205. FirstLight Networks is a wholly owned indirect subsidiary of FLF. FLF and FirstLight Networks are each wholly owned subsidiaries of FirstLight Holdco, Inc. (together with its subsidiaries, including Applicants, “FirstLight”), a Delaware corporation. For the Commission’s reference, charts depicting the corporate ownership structure of Applicants are attached as **Exhibit A**.

FirstLight offers advanced telecommunications products featuring a comprehensive portfolio of high bandwidth connectivity solutions including Ethernet, wavelengths and dark fiber, as well as dedicated Internet access solutions, data center services, managed services, cloud, unified communications, and voice services. FirstLight’s customers include national cellular providers, wireline carriers, and enterprises spanning high tech manufacturing and research companies, healthcare providers, financial institutions, law firms, secondary schools, colleges and universities, and local and state governments. FirstLight currently operates approximately 25,000 miles of fiber connecting approximately 15,000 locations throughout the Northeast region. It also operates 14 colocation facilities and data centers.

FLF is authorized to provide intrastate telecommunications services in the following U.S. states: Connecticut, Maine, Massachusetts, New Hampshire, New Jersey, New York,

Pennsylvania, Rhode Island, and Vermont. In Pennsylvania, FLF is authorized as a competitive local exchange carrier, facilities-based and resold interexchange carrier, and competitive access provider. *See* Docket Nos. A-2018-2641973, A-2018-3004320, A-2018-2641954, A-2018-2641935, and A-2018-2641937.<sup>2</sup> On October 17, 2025, FirstLight Networks filed an application in Docket Nos. A-2025-3058053, A-2025-3058050, A-2025-3058048, and A-2025-3058052 for authorization as a competitive local exchange carrier, facilities-based and resold interexchange carrier, and competitive access provider in Pennsylvania. FLF is also authorized by the Federal Communications Commission (“FCC”) to provide domestic (interstate) and international telecommunications services, and FirstLight Networks expects to become authorized by the FCC to provide domestic (interstate) and international telecommunications services.

Additional information concerning Applicants’ technical, managerial and financial qualifications has been submitted to the Commission as part of their respective certification applications and filings for prior transactions with the Commission and is therefore already a matter of public record and incorporated by reference. After the *Pro Forma* Asset Transfer is completed, Applicants will remain well-qualified to provide service to their customers, and their operations will continue to be overseen by the same well-qualified management team with substantial telecommunications experience and technical expertise.

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<sup>2</sup> The authorizations were originally granted in the name of TVC Albany, Inc. Subsequently, in Docket No. R-2019-3010041 on May 14, 2019, the Commission reissued the authorizations to reflect the name change to FirstLight Fiber, Inc.

## II. DESIGNATED CONTACTS

Questions or any correspondence, orders, or other materials pertaining to this filing should be directed to the following:

Catherine G. Vasudevan  
PA I.D. No. 210254  
MORGAN, LEWIS & BOCKIUS LLP  
2222 Market Street  
Philadelphia, PA 19103-3007  
Tel: 215-963-5000  
Fax: 215-963-5001  
[catherine.vasudevan@morganlewis.com](mailto:catherine.vasudevan@morganlewis.com)

*with a copy to:*  
  
Catherine Wang  
Patricia Cave  
MORGAN LEWIS & BOCKIUS LLP  
1111 Pennsylvania Ave., N.W.  
Washington, D.C. 20004  
Tel: 202-739-3000  
Fax: 202-739-3001  
[catherine.wang@morganlewis.com](mailto:catherine.wang@morganlewis.com)  
[patricia.cave@morganlewis.com](mailto:patricia.cave@morganlewis.com)

*and:*

Jill Sandford  
Chief Legal Officer  
FirstLight Fiber, Inc.  
12 Metro Park Road  
Albany, NY 12205  
Tel: 518-694-8736  
[jsandford@firstlight.net](mailto:jsandford@firstlight.net)

## III. DESCRIPTION OF THE PRO FORMA ASSET TRANSFER

The *Pro Forma* Asset Transfer is part of FLF's plan to execute an internal restructuring which will organize its network and operations being assigned. The plan also involves obtaining financing to support that network and operations and for other general corporate purposes. FLF may continue to provide telecommunications services to other existing and new customers that are not a part of this internal restructuring plan.<sup>3</sup> FLF will implement this plan by assigning to FirstLight Networks certain assets in Pennsylvania, including communications optical fiber,

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<sup>3</sup> Since FLF may continue to provide telecommunications services to other existing customers that are not assigned to FirstLight Networks, as well as future customers, FLF intends to retain its Pennsylvania authorization at this time.

certain customer contracts, rights in third party fibers, and associated telecommunications equipment used to provision services or facilities to the affected customers. A depiction of the *Pro Forma* Asset Transfer is included as **Exhibit A**. The affected customers will be sent a notice of the *Pro Forma* Asset Transfer at least 30 days prior to the *Pro Forma* Asset Transfer. Affected customers will receive a notice that is substantially consistent with the sample notice attached as **Exhibit B**.

To ensure seamless and uninterrupted service, all of the customers assigned to FirstLight Networks will continue to receive service from FirstLight Networks under the same rates, terms and conditions of service as with FLF. Future changes in the rates, terms and conditions of service to the affected customers will be undertaken in the ordinary course of business pursuant to customer contracts and the applicable federal and state requirements. The *Pro Forma* Asset Transfer will not disadvantage customers or cause confusion or disruption to customers since FLF and FirstLight Networks will market and perform its services under the “FirstLight” brand and will operate through the same customer service, technical, operational and managerial personnel.

#### **IV. PUBLIC INTEREST CONSIDERATIONS**

Applicants respectfully submit that the proposed *Pro Forma* Asset Transfer serves the public interest. The *Pro Forma* Asset Transfer is an integral part of the financing arrangements that will provide support for the operations and network serving the affected customers. The *Pro Forma* Asset Transfer will result in the assignment of customers and assets between affiliated companies that will continue to provide telecommunications services to such assigned customers without interruption. FirstLight Networks will provide services at the same rates and on the same terms and conditions as provided by FLF (subject to future changes in the ordinary course of business pursuant to applicable law and contract provisions). Given that the Applicants share the

same management team, customers will continue to benefit from that team’s knowledge and experience in the Pennsylvania market.

**V. INFORMATION REQUIRED BY 52 PA. CODE § 63.324(d)**

Pursuant to 52 PA. CODE § 63.324, the Applicants provide the following information:

1. Name, address and telephone number of each party or applicant to the transaction:

The contact information for Applicants is:

12 Metro Park Road  
Albany, NY 12205  
Tel: 1-888-832-4976  
[www.firstlight.net](http://www.firstlight.net)

2. Government, state or territory under the laws of which each corporate or partnership applicant to the transaction is organized:

FLF is a Delaware corporation and FirstLight Networks is a Delaware limited liability company.

3. The name, title, post office address and telephone number of the officer or contact point, including legal counsel in this Commonwealth, to whom correspondence concerning the transaction is to be addressed:

Contact information for whom correspondence concerning this Application should be addressed to is provided in Section II of this Application.

4. The name, address, citizenship and principal place of business of any person, party or entity that directly or indirectly owns more than 20% of the equity of the applicant, and the percentage of equity owned by each of those entities (to the nearest 1%):

The following entities hold a twenty percent (20%) or greater, direct or indirect equity ownership interest in FirstLight Networks:

**FirstLight Issuer, LLC (“FirstLight Issuer”)**

Address:	12 Metro Park Road Albany, NY 12205
Citizenship:	U.S. (Delaware)
Principal Business:	Holding company
Ownership Interest:	100% equity (directly as sole member of FirstLight Networks)

**FirstLight Guarantor, LLC (“FirstLight Guarantor”)**

Address: 12 Metro Park Road  
Albany, NY 12205  
Citizenship: U.S. (Delaware)  
Principal Business: Holding company  
Ownership Interest: 100% equity (indirectly as sole member of  
FirstLight Issuer)

**FirstLight Fiber, Inc. (“FLF”)**

Address: 12 Metro Park Road  
Albany, NY 12205  
Citizenship: U.S. (Delaware)  
Principal Business: Operating company  
Ownership Interest: 100% equity (indirectly as sole member of  
FirstLight Guarantor)

**FirstLight Holdco, Inc. (“FL Holdco”)**

Address: 12 Metro Park Road  
Albany, NY 12205  
Citizenship: U.S. (Delaware)  
Principal Business: Holding company  
Ownership Interest: 100% equity (indirectly as sole member of FLF)

**Flight Intermediate Holdco Inc. (“FIH”)**

Address: 1114 Avenue of the Americas  
New York, New York 10036  
Place of Organization: Delaware  
Principal Business: Holding Company  
Ownership Interest: 100% equity (indirectly, as 100% owner of FL  
Holdco)

**Flight Holdco Inc. (“Flight Holdco”)**

Address: 1114 Avenue of the Americas  
New York, New York 10036  
Place of Organization: Delaware  
Principal Business: Holding Company  
Ownership Interest: 100% equity (indirectly, as 100% owner of FIH)

**Flight Group Holdings LP (“Flight Group Holdings”)**

Address: 1114 Avenue of the Americas  
New York, New York 10036  
Place of Organization: Delaware  
Principal Business: Holding Company  
Ownership Interest: 100% equity (indirectly, as 100% owner of Flight  
Holdco)

**Antin Infrastructure Partners III, FPCI (“Antin III France”)**

Address: 374 Rue Saint Honoré  
75001 Paris, France

Place of Organization: France

Principal Business: Investments

Ownership Interest: 30.81% (indirectly, through a 30.81% limited partnership interest in Flight Group Holdings)

**Antin Infrastructure Partners III, L.P. (“Antin III UK”)**

Address: 14 St. George Street  
W1S 1FE London, United Kingdom

Place of Organization: United Kingdom

Principal Business: Investments

Ownership Interest: 29.00% equity (indirectly, through a 29.00% limited partnership interest in Flight Group Holdings)

**Antin Infrastructure Partners III-B SCSp (“Antin III-B”)**

Address: 37a Avenue JF Kennedy  
Luxembourg, Grand Duchy of Luxembourg, L-1855

Place of Organization: Luxembourg

Principal Business: Investments

Ownership Interest: 21.12% equity (indirectly, through a 21.12% limited partnership interest in Flight Group Holdings)

Antin III France is a fund managed and controlled by Antin Infrastructure Partners S.A.S. (“Antin SAS”). Antin III UK is a fund managed and controlled by Antin Infrastructure Partners UK Limited (“Antin UK”, and together with Antin SAS, “Antin Infrastructure Partners”), and Antin III-B is a fund managed by Antin Infrastructure Partners III Luxembourg GP Sarl (“Antin GP”). Antin GP is owned and controlled by Antin UK. Antin Infrastructure Partners is a private equity firm based in New York, Paris, London and Luxembourg that is focused on infrastructure investments in the telecommunications, energy and environment, transportation, and social sectors.

To Applicants’ knowledge, no other person or entity, directly or indirectly, owns or controls a 20 percent (20%) or greater equity ownership interest in Applicants.

5. A summary description of the transaction:

A summary description of the *Pro Forma* Asset Transfer is provided in Section III of this Application.

6. A summary of the services and the service territories in this Commonwealth that will be affected by the transaction:

No service territories will be affected by the *Pro Forma* Asset Transfer. FirstLight Networks will provide services in the same locations as FLF currently does.

7. A verified statement as to how the transaction fits into one or more of the categories subject to the general rule for notification:

Applicants verify that the *Pro Forma* Asset Transfer falls into the General Rule Transaction category under 52 Pa. Code § 63.324(a)(1) because FLF will transfer more than 20 percent of its assets located in Pennsylvania to FirstLight Networks.

8. Identification of other transactions related to the transaction:

In connection with the *Pro Forma* Asset Transfer, FirstLight Networks also is filing an Abbreviated Securities Certificate regarding the financing arrangements.

9. A verified statement whether the transaction warrants special consideration because either party to the transaction is facing imminent business failure:

The *Pro Forma* Asset Transfer does not warrant special consideration because either party is facing imminent business failure.

10. Identification of a separately filed waiver request sought in conjunction with the transaction:

No waiver request is being made with respect to the *Pro Forma* Asset Transfer, except to the extent a waiver is required of any applicable migration rules associated with the transfer of customers described above.

11. A verified statement containing facts and allegations establishing:

(i) For a merger or similar transaction, how the transaction will affirmatively promote the service, accommodation, convenience, or safety of the public in some substantial way as required by State law.

(ii) Findings that approval for a transaction subject to 66 Pa.C.S. 1103(a) (relating to procedure to obtain certificates of public convenience) is necessary or proper for the service, accommodation, convenience, or safety of the public.

(iii) The impact of the transaction on competition.

The Applicants verify the facts and allegations set forth in Section IV above, demonstrating the impact of the *Pro Forma* Asset Transfer on the promotion of service, competition, and the public interest.

12. A verified statement affirming that the applicant is in compliance with Commission obligations and filings and a listing of all State and Federal proceedings when:

(i) Within the 3-year period prior to filing the application, the applicant was found to have violated either State or Federal requirements.

(ii) Within the 3-year period prior to filing the application, the applicant is alleged to have violated either State or Federal requirements.

Applicants verify that, to their knowledge, Applicants are in compliance with all Commission obligations and filings and have not been found to have violated either State or Federal requirements within the 3-year period prior to filing this Application. Applicants also verify that, to their knowledge, Applicants have not been alleged to have violated either State or Federal requirements within the 3-year period prior to filing this Application.

13. A verified statement affirming that customers received prior notice. Notice shall be accomplished using a notice approved by the Commission's Bureau of Consumer Services (BCS). Any disagreement between the applicant and BCS shall be addressed by an appeal from an action of staff mirroring the process in 5.44 (relating to petitions for appeal from actions of the staff) of the Commission's rules of practice and procedure.

The *Pro Forma* Asset Transfer will not result in any changes to the services received by customers, including rates, terms and conditions of service. Each of the affected customers will be sent notice of the *Pro Forma* Asset Transfer. A sample of the notice to be provided to affected customers is attached as **Exhibit B**.

14. A verified statement containing a copy of any Commonwealth utility certificates held by the applicant:

Please see Section I of the Application, in which the Applicants verify the authority held in Pennsylvania.

15. A verified statement on the effect of the transaction on existing Commonwealth tariffs. If applicable or in response to a request from staff, an applicant shall provide a red-line document identifying changes in existing Commonwealth tariffs before and after the transaction for which the applicant seeks approval from the Commission:

Applicants verify that the *Pro Forma* Asset Transfer will have no impact on existing Commonwealth tariffs.

16. A verified statement on the transaction's effect on the existing affiliate interest agreements of the applicant:

Applicants verify that the *Pro Forma* Asset Transfer will have no effect on the Applicants' affiliated interest agreements, if any.

17. A verified statement establishing that no State or Federal regulatory agency is expected to undertake an informal or formal investigation, complaint or proceeding relating to the transaction:

Applicants verify that the *Pro Forma* Asset Transfer will not require an informal or formal investigation, complaint or proceeding except for the regulatory reviews typically required for such transactions.

18. Organizational charts showing the effect on the applicant's organization before and after the transaction:

After the *Pro Forma* Asset Transfer, Applicants' organizational structure will remain unchanged. Included in **Exhibit A** are diagrams depicting the corporate ownership structure of Applicants.

19. A copy of the application filed at the FCC or a notice filed with the U.S. DOJ, if any, including the electronic location on the agency's web site:

No application or notice has been or will be filed with the U.S. DOJ for the *Pro Forma* Asset Transfer under the Hart-Scott-Rodino Act. Applicants expect to file a post-closing notice of the *Pro Forma* Asset Transfer with the FCC, however no approval of the FCC is required in connection with the *Pro Forma* Asset Transfer.

20. A verified statement setting forth the expected public effect of the transaction on the capital structure of the applicant over the next 5 years:

Please see Section IV of the Application, in which Applicants provide a verified description of the public benefits of the *Pro Forma* Asset Transfer. Applicants also verify that the *Pro Forma* Asset Transfer is expected to have a positive impact on FLF's and FirstLight Networks' capital structure.

21. For an applicant subject to a broadband deployment commitment under Federal or State law, a verified statement affirming that the applicant follows that commitment:

Applicants verify that they are under no Federal or State broadband deployment obligations in Pennsylvania.

22. For an applicant with eligible telecommunications carrier status under Federal and State law, a verified statement affirming that the applicant is in compliance with the law and that the applicant will continue to be in compliance with the law:

Applicants verify that they are not eligible telecommunications carriers.

23. A verified statement affirming that the transaction complies with the prohibition against cross-subsidization imposed under Federal and State law:

Applicants verify that the *Pro Forma* Asset Transfer does not violate Federal or State cross-subsidization rules.

**VII. CONCLUSION**

WHEREFORE, for the reasons set forth above, Applicants respectfully request that the Commission grant all authority necessary for *pro forma* assignment of certain assets from FLF to FirstLight Networks as described herein.

Respectfully submitted,

/s/ Catherine G. Vasudevan  
Catherine G. Vasudevan  
PA I.D. No. 210254  
MORGAN, LEWIS & BOCKIUS LLP  
2222 Market Street  
Philadelphia, PA 19103-3007  
Tel: 215-963-5000  
Fax: 215-963-5001  
[catherine.vasudevan@morganlewis.com](mailto:catherine.vasudevan@morganlewis.com)

*Counsel for Applicants*

Dated: October 28, 2025

**LIST OF EXHIBITS**

**Exhibit A**            Corporate Ownership Structure and Depiction of the *Pro Forma* Asset Transfer

**Exhibit B**            Sample Customer Notice

**Verification**

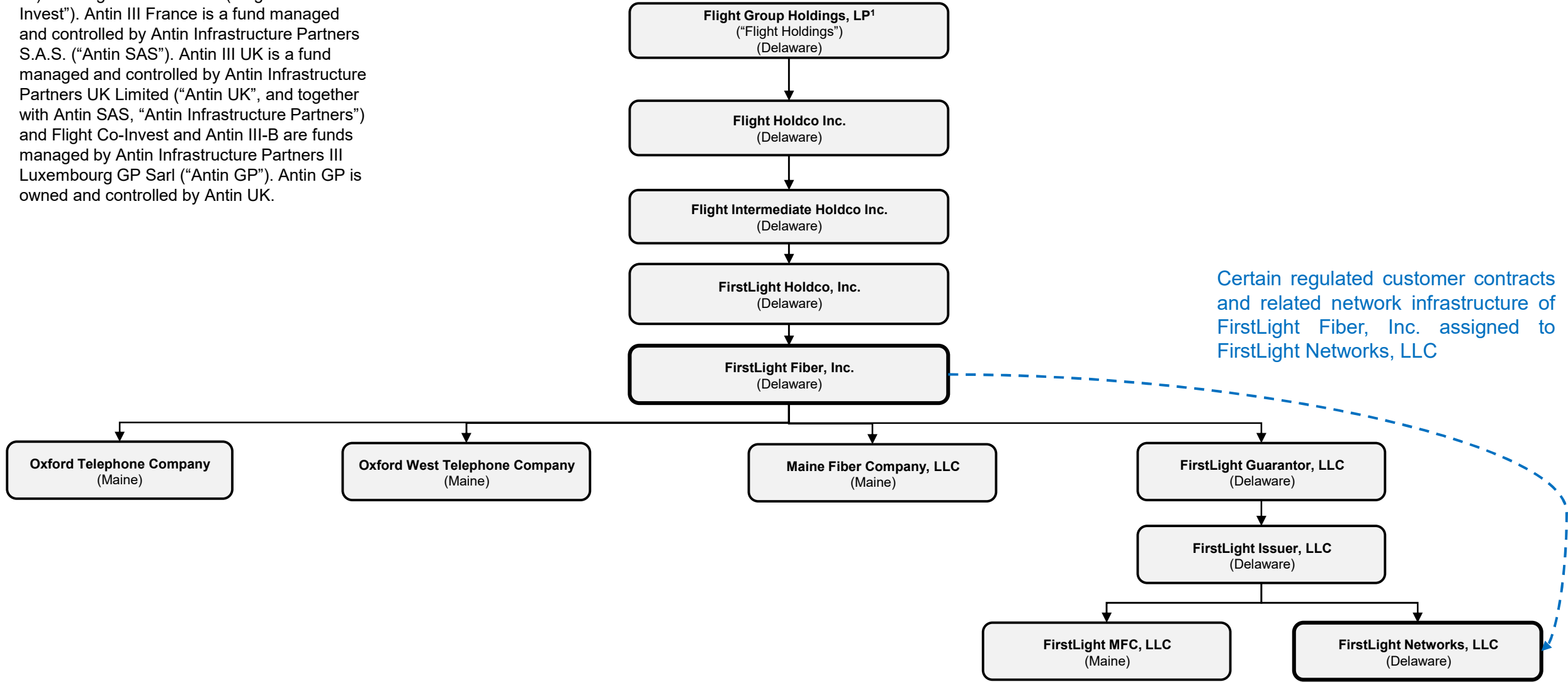
**Certificate of Service**

**EXHIBIT A**

**Corporate Ownership Structure and Depiction of the *Pro Forma* Asset Transfer**

<sup>1</sup> Flight Holdings is owned by the private equity funds: Antin Infrastructure Partners III FPCI (“Antin III France”), Antin Infrastructure Partners III LP (“Antin III UK”), Antin Infrastructure Partners III-B SCSp (“Antin III-B”) and Flight Co-Invest LP (“Flight Co-Invest”). Antin III France is a fund managed and controlled by Antin Infrastructure Partners S.A.S. (“Antin SAS”). Antin III UK is a fund managed and controlled by Antin Infrastructure Partners UK Limited (“Antin UK”, and together with Antin SAS, “Antin Infrastructure Partners”) and Flight Co-Invest and Antin III-B are funds managed by Antin Infrastructure Partners III Luxembourg GP Sarl (“Antin GP”). Antin GP is owned and controlled by Antin UK.

### **Current Ownership and Depiction of the *Pro Forma* Asset Transfer**



All ownership percentages are 100%.

**EXHIBIT B**

**Sample Customer Notice**

## Sample Customer Notice

As a valued FirstLight Fiber, Inc. (“FirstLight Fiber”) customer, we want to thank you for your business. On or about [DATE], 2026, subject to receipt of any necessary regulatory approvals (the “Transfer Date”), FirstLight Fiber will be transferring your service to its subsidiary, FirstLight Networks, LLC (“FirstLight Networks”).

Your services and the associated pricing and terms and conditions of service will not change. Any future changes to the rates and terms and conditions of your services will be made in accordance with your contract and applicable law. There is no charge associated with this change and any preferred carrier freeze you have will remain in place. We will continue to resolve any issues you may have with your account or service using the same customer service number, which is 888-832-4976.

Until the transfer is complete, you will continue to be responsible for paying your bills to FirstLight Fiber, as you have done in the past. After the transfer has been completed, you will be responsible for paying your bills to FirstLight Networks. Prior to the Transfer Date, FirstLight Fiber will provide you with new bill payment instructions, which may require a change to the address and/or bank account that you send your service payments to. If you obtain multiple services from FirstLight Fiber, some services may be retained by FirstLight Fiber depending on which services you receive and where you receive them. In those situations, we will also provide further information.

We recognize that you have a choice in communications and infrastructure services provider and believe that this change will enhance our ability to serve you. We look forward to continuing to provide you with the superior service you are accustomed to receiving and to the opportunity to provide you additional services.

## VERIFICATION

I, Jill Sandford, hereby declare that I am Chief Legal Officer of FirstLight Fiber, Inc. and FirstLight Networks, LLC (together, the “Company”); that I am authorized to make this Verification on behalf of the Company; that the foregoing filing was prepared under my direction and supervision; that the contents with respect to the Company are true and correct to the best of my knowledge, information, and belief; and that I expect to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa.C.S. § 4904 (relating to un-sworn falsification to authorities).

Dated: October 20, 2025



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Jill Sandford  
Chief Legal Officer  
FirstLight Fiber, Inc.  
FirstLight Networks, LLC

**CERTIFICATE OF SERVICE**

I, Micah A. Leval, hereby certify that on this 28<sup>th</sup> day of October 2025, a copy of the foregoing Application was served via first class, prepaid postage mail delivery upon the following:

Office of Consumer Advocate  
555 Walnut Street  
5th Floor, Forum Place  
Harrisburg, PA 17101-1923

Office of Small Business Advocate  
Commerce Building, Suite 1102  
555 Walnut Street, 1st Floor – Forum Place  
Harrisburg, PA 17101

Office of Attorney General  
Bureau of Consumer Protection  
15th Floor, Strawberry Square  
Harrisburg, PA 17120

Pennsylvania Public Utility Commission  
Bureau of Investigations and Enforcement  
Commonwealth Keystone Building  
400 North Street, 2<sup>nd</sup> Floor West  
Harrisburg, PA 17120

*/s/ Micah A. Leval* \_\_\_\_\_

Micah A. Leval