

December 5, 2025

Via Electronic Filing

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

**Re: Docket No. C-2025-3054739
Tabitha Cousins v. FE PA (Met-Ed Rate District)
Motion for Continuance**

Dear Secretary Homsher:

Attached for filing is the Motion of FirstEnergy Pennsylvania Electric Company (Met-Ed Rate District) for a Continuance of the Call-in Telephonic Hearing scheduled for Wednesday, January 21, 2026, at 10:00 a.m.

A copy of the Motion for Continuance has been provided to Complainant in the manner indicated on the enclosed Certificate of Service.

If there are any questions, please feel free to contact me.

Very truly yours,

Reger Rizzo & Darnall LLP



Margaret A. Morris

MAM/co
Enclosures

cc: The Hon. Charece Z. Collins, PA Public Utility Commission [w/encls.]
Tori Giesler, Esquire, FirstEnergy Service Company [w/encls.]
Tabitha Cousins [w/encls.]

**Re: Docket No. C-2025-3054739
Tabitha Cousins v. FE PA (Met-Ed Rate District)
Motion for Continuance**

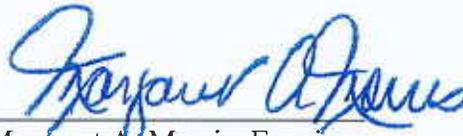
CERTIFICATE OF SERVICE

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

Via Electronic and First-Class Mail

Tabitha Cousins
940 Myerstown Road
Gardeners, PA 17324
fahnestock55@gmail.com

Dated: December 5, 2025


Margaret A. Morris, Esquire

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

TABITHA COUSINS

v.

FIRSTENERGY PENNSYLVANIA
ELECTRIC COMPANY

Docket No. C-2025-3054739

NOTICE TO PLEAD

Pursuant to 52 Pa. Code § 5.103, you are hereby notified that if you do not file a written response answering the enclosed Motion for Continuance of FirstEnergy Pennsylvania Electric Company (Met-Ed Rate District) **within five (5) days from service of this notice**, the facts set forth by of FirstEnergy Pennsylvania Electric Company (Met-Ed Rate District) in the Motion for Continuance may be deemed to be true, whereby requiring no other proof. All pleadings, such as an Answer to Motion for Continuance, must be filed with the Secretary of the Pennsylvania Public Utility Commission, with a copy served to counsel for FirstEnergy Pennsylvania Electric Company (Met-Ed Rate District), Margaret A. Morris, Esq., and the Honorable Charece Z. Collins, the Administrative Law Judge presiding over the issue.

File by Mail or e-file with:

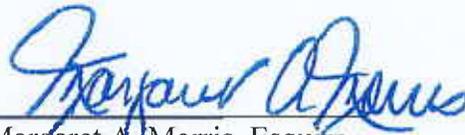
Matthew Homsher, Esquire
Secretary
Pennsylvania Public Utility Commission
P.O. Box 3265
Harrisburg, PA 17105-3265

With a copy to:

Margaret A. Morris, Esquire
Reger Rizzo & Darnall LLP
Cira Centre, 13th Floor
Philadelphia, PA 19104
mmorris@regerlaw.com

Date: December 5, 2025

The Hon. Charece Z. Collins
charcollin@pa.gov



Margaret A. Morris, Esquire
Attorney ID No. 75048
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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

TABITHA COUSINS	:	
	:	
v.	:	Docket No. C-2025-3054739
	:	
FIRSTENERGY PENNSYLVANIA	:	
ELECTRIC COMPANY	:	

MOTION OF FIRSTENERGY PENNSYLVANIA ELECTRIC COMPANY FOR A CONTINUANCE OF SCHEDULED HEARING

FirstEnergy Pennsylvania Electric Company, Met-Ed Rate District (Respondent or Company), by and through its attorneys, Reger Rizzo & Darnall LLP, and pursuant to 52 Pa. Code § 1.15, respectfully requests that the Honorable Charece Z. Collins (Judge Collins) of the Pennsylvania Public Utility Commission (Commission) grant its Motion for Continuance (Motion) and issue an order continuing the scheduled Call-in Telephonic Hearing of January 21, 2026 (Hearing) as undersigning counsel has a scheduled conflict at the same date and time.

In support thereof, the Company avers as follows:

1. On April 24, 2025, Tabitha Cousins (Complainant) filed a Formal Complaint seeking, *inter alia*, a subsequent Commission payment arrangement (PAR) for service in her name to 940 Myerstown Road, Gardners, PA 17324 (Service Location) under Account No. 100138387145 (Account).

2. On May 14, 2025, the Company filed an Answer denying that the Complainant is entitled to a Commission PAR for the Account balance.

3. By Notice, dated November 19, 2025, an Initial Call-In Telephonic Hearing was scheduled for Wednesday, January 21, 2026, before Judge Collins.

4. On December 2, 2025, the Company filed a Notice of Appearance of Margaret A. Morris, Esquire as counsel on behalf of FirstEnergy Pennsylvania Electric Company, Met-Ed Rate District.

5. The Company's new counsel has a previously scheduled conflict with the current January 21, 2026 hearing date, in a separate, unrelated matter before the Commission.

6. 52 Pa. Code § 1.15 (b) states:

(b) Except as otherwise provided by statute, requests for continuance of hearings or for extension of time in which to perform an act required or allowed to be done at or within a specified time by this title or by order of the Commission or the presiding officer, shall be by motion in writing, timely filed with the Commission, stating the facts on which the application rests, except that during the course of a proceeding, the requests may be made by oral motion in the hearing before the Commission or the presiding officer. Only for good cause shown will requests for continuance be considered. The requests for a continuance should be filed at least 5 days prior to the hearing date.

7. The unavailability of the Company's new counsel constitutes good cause consistent with Commission regulation.

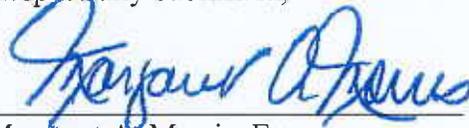
8. On December 5, 2025, the office of undersigning counsel attempted unsuccessfully to reach the Complainant *via* telephone to notify her of the Company's need for a continuance of the scheduled hearing. A voicemail message was left, followed by an email. At

the time of this filing, the Complainant has not responded with her position on the requested continuance.

9. The Company respectfully requests that the Call-in Telephonic Hearing be rescheduled for a date after January 21, 2026.

WHEREFORE, for good cause shown, FirstEnergy Pennsylvania Electric Company, Met-Ed Rate District, requests that the Honorable Charece Z. Collins grant its Motion for Continuance of the scheduled January 21, 2026, Initial Call-In Telephonic Hearing.

Respectfully submitted,



Date: December 5, 2025

Margaret A. Morris, Esq.
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Company (Met-Ed Rate District)*