

Christopher Love
7523 Country Hills Dr.
Huntingdon, PA 16652

12/8/2025

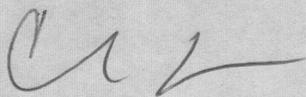
Matthew Homsher, Esquire
Secretary
PA Public Utility Commission
P.O. Box 3265
Harrisburg, PA 17105-3265

Re: **Docket No. F-2025-3058313**

Dear Secretary Homsher,

I am writing this letter to inform the court that I disagree with the facts and circumstances addressed in the correspondence I received from Reger, Rizzo, & Darnall LLP dated 24NOV25 (attached in e-file). There are several factual errors in that letter that I disagree with, along with several omissions of facts. I would like to address these errors during my court proceedings.

Sincerely,



Christopher Love

REGER RIZZO
DARNALL LLP
ATTORNEYS AT LAW

Margaret A. Morris
Partner
mmorris@regerlaw.com

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

Main: 215.495.6500
Direct: 215.495.6524

November 24, 2025

Via Electronic Filing

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

**Re: Docket No. F-2025-3058313
Christopher Love v. FirstEnergy Pennsylvania Electric Company
Answer and New Matter of FE PA (Penelec Rate District)**

Dear Secretary Homsher:

Attached for filing is the Answer and New Matter of FirstEnergy Pennsylvania Electric Company (Penelec Rate District) to the Complaint of Christopher Love (Complainant) in the above-referenced proceeding.

A copy of the enclosed Answer and New Matter has been forwarded 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.]
Christopher Love [w/encls.]



Commonwealth of Pennsylvania
Pennsylvania Public Utility Commission
 Harrisburg, PA 17105-3265
EFILING - FILING DETAIL

Date Created	Filing Number
11/24/2025	2900141

Your filing has been electronically received. Upon review of the filing for conformity with the Commission's filing requirements, a notice will be issued acknowledging acceptance or rejection (with reason) of the filing. The matter will receive the attention of the Commission and you will be advised if any further action is required on your part.

The date filed on will be the current day if the filing occurs on a business day before or at 4:30 p.m. (EST). It will be the next business day if the filing occurs after 4:30 p.m. (EST) or on weekends or holidays.

Docket Number: F-2025-3058313

Case Description: Christopher Love v. FirstEnergy Pennsylvania Electric Company (Penelec Rate District)

Transmission Date: 11/24/2025 12:38 PM

Filed On: 11/24/2025 12:38 PM

eFiling Confirmation Number: 2900141

File Name	Document Type	Upload Date
LoveANM.pdf	Answer to Formal Complaint	11/24/2025 12:25:03 PM

For filings exceeding 250 pages, the PUC is requiring that filers submit one paper copy to the Secretary's Bureau within three business days of submitting the electronic filing online. Please mail the paper copy along with copy of this confirmation page to Secretary, Pennsylvania Public Utility Commission, 400 North Street, Harrisburg PA 17120 a copy of the filing confirmation page or reference the filing confirmation number on the first page of the paper copy.

No paper submission is necessary for filings under 250 pages.

You can view a record of this filing and previous filings you have submitted to the PUC by using the links in the Filings menu at the top of the page. Filings that have been submitted within the last 30 days can be viewed by using the Recent Filings link. Older filings can be viewed by using the search options available in the Filing History link.

**Re: Docket No. F-2025-3058313
Christopher Love 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

Christopher Love
christopher.a.love78@gmail.com

Dated: November 24, 2025



Margaret A. Morris, Esquire

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

CHRISTOPHER LOVE

v.

FIRSTENERGY PENNSYLVANIA ELECTRIC
COMPANY

Docket No. F-2025-3058313

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 FirstEnergy Pennsylvania Electric Company within twenty (20) days from service of this notice, the facts set forth by FirstEnergy Pennsylvania Electric Company 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 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
mmorris@regerlaw.com

Date: November 24, 2025



Margaret A. Morris, Esquire
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

*Counsel for FirstEnergy Pennsylvania Electric
Company (Penelec Rate District)*

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

CHRISTOPHER LOVE :
 :
 v. : Docket No. F-2025-3058313
 :
 FIRSTENERGY PENNSYLVANIA :
 ELECTRIC COMPANY :

**ANSWER AND NEW MATTER OF FIRSTENERGY PENNSYLVANIA ELECTRIC
COMPANY TO THE FORMAL COMPLAINT OF CHRISTOPHER LOVE**

FirstEnergy Pennsylvania Electric Company, Penelec Rate District, (Respondent, FE PA, or Company), by and through its attorneys, Reger Rizzo & Darnall LLP, pursuant to 52 Pa. Code § 5.61, hereby submits its Answer and New Matter to the Formal Complaint filed by Christopher Love (Complainant). In response thereto, Respondent avers and represents as follows:

1. Admitted upon information provided by the Complainant.
2. Admitted that the Complainant is served by Penelec Rate District.
3. Admitted that Respondent provides residential electric service in the Complainant's name to 7532 Country Hill Road, Huntingdon, Pennsylvania (Service Location) under Account No. 100164916205 (Account) and to 7533 7532 Country Hill Road, Huntingdon, Pennsylvania (Garage/Apartment Service Location) under Account No. 100164916205 (Garage/Apartment Account).

4. Denied that there are incorrect charges on either account. The Respondent specifically avers that at all times relevant to this proceeding, the Company's actions have been reasonable and performed in accordance with all applicable laws, as well as the Company's Commission-approved tariff, the Pennsylvania Public Utility Code (Code), Commission regulations and orders.

By way of background, the property at issue contains two buildings: the Service Location and a Garage with a rental apartment. The Complainant resides in the Service Location, a house; the Tenant resides in the Apartment above the Garage. On August 8, 2025, the Tenant reported potential mixed meters between the Service Location and Apartment.

On August 1, 2025, a mixed meter investigation was conducted. The field technician verified that each meter was installed at the correct residence but the meters were not correctly associated with the correct residence in the Company's billing system, known as SAP. The Company's records indicated that the Service Location was served by Meter #5001593994; the field visit confirmed that it should be Meter #5000319755. Conversely, the Company's records indicated that the Apartment was served by Meter No. #5000319755; the field visit confirmed that it should be Meter No. #5001593994. Each account was corrected in SAP. By letter, dated September 12, 2025, the Complainant was notified of the mixed meter investigation and the rebilling of each respective account.

By way of further answer, the Company avers that while investigating the reported mixed meter situation, the Company verified that the existence of shared metering, i.e., the meter serving the Tenant was also recording the usage for the Garage which the Tenant did

not have access. The Respondent, consistent with Section 1529.1 of the Code,¹ transferred the Tenant's balance² to the Complainant's newly established Account for the Service Location.

The Respondent specifically avers that the express language of Section 1529.1 provides that the owner of the rental property is responsible for the payment of all utility services provided to the property when the usage of several tenants is recorded on one meter and billed accordingly, regardless of whether or not the owner has notified the utility providing the service. The Commission has held that electric service must be established in the name of the owner and paid for by the owner as a result of shared metering; the owner/landlord is responsible for paying the utility bills until the current foreign load is corrected and the utility places the account back in the tenant's name. The arrearage, however, must remain in the owner/landlord's name. This rule applies even if the amount of usage attributable to foreign load is considered *de minimus*. The Commission does not have jurisdiction over disputes concerning the financial responsibilities of private parties, such as the landlord and tenant, and such matters are to be resolved in the Court of Common Pleas. *Ace Check Cashing, Inc. v. Philadelphia Gas Works*, Docket No. C-2008-2056428 (Opinion and Order entered May 21, 2010) at 6-8.

5. To the extent the allegations contained within this paragraph are construed to purport allegations of fact, rather than requests for relief, any such allegation of fact is denied. By way of further response, this paragraph contains a prayer for relief to which no response is required. The Respondent specifically denies that Complainant is entitled to the relief requested.

¹ 66 Pa.C.S. § 1529.1 *et seq.*

² The Tenant's outstanding balance, as of August 1, 2025, attributable to consumption for the Apartment, was \$1,583.21.

By law, a public utility is entitled to receive payment for the service it provides. *Scaccia v. West Penn Power Co.*, 55 Pa. P.U.C. 637 (1982). Otherwise, customers' unpaid bills are included in the utility's uncollectible expense and ultimately paid by the remaining ratepayers. *Cf.*, *Bolt v. Duquesne Light Co.*, 66 Pa. P.U.C. 463 (1988); *O'Toole v. The Bell Telephone Co. of Pennsylvania*, Docket Number C-923964 (Final Order entered August 20, 1992).

6. No response required.

7a. Admitted the Formal Complaint is a timely appeal of the Decision issued by the Commission's Bureau of Consumer Services (BCS) which, *inter alia*, dismissed the matter finding the Complainant is responsible for the Tenant's balance due to the verification of shared metering.

7b. No response required.

7c. To the extent the allegations contained within this paragraph are construed to purport allegations of fact, rather than the Complainant's opinions, beliefs or requests for relief, any such allegation of fact is denied. The Company specifically denies that it provided unreasonable or inadequate service in handling the concerns/issues of the Complainant. Strict proof substantiating this allegation is demanded at hearing.

8. No response required.

9. No response required.

10. No response required.

11. No response required.

NEW MATTER

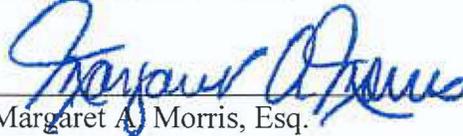
12. The Complainant, as owner of the property, is responsible to label the meter sockets consistent with the specifications set forth in the Customer Guide to Electric Service.

13. The Company is authorized by Commission regulations to render a make-up bill for the unbilled utility service as a result of the meter mix-up that resulted in the billing error. 52 PA Code § 56.14.

14. The Respondent acted in strict compliance with the Code and Commission precedent, requiring that the charges incurred under the Tenant's account at the Service Location be placed in the Complainant's name upon verification of shared metering.

WHEREFORE, Respondent, FirstEnergy Pennsylvania Electric Company, requests that the Complaint filed by Christopher Love be dismissed with prejudice or denied in its entirety.

Respectfully submitted,



Date: November 24, 2025

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

*Counsel for FirstEnergy Pennsylvania Electric
Company (Penelec Rate District)*

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

CHRISTOPHER LOVE	:	
Complainant	:	
	:	
v.	:	Docket No. F-2025-3058313
	:	
FIRSTENERGY PENNSYLVANIA	:	
ELECTRIC COMPANY	:	
Respondent	:	

VERIFICATION

I, Derek Sheehan, hereby state that the facts set forth above are true and correct to the best of my knowledge, information and belief and that I expect FirstEnergy Pennsylvania Electric Company on behalf of its Penelec Rate District 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.

11/24/2025
Date

Derek Sheehan