

COMMONWEALTH OF PENNSYLVANIA



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December 15, 2025

**Via Electronic Filing**

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

Re: Petition of First Energy Pennsylvania  
Electric Company for Approval of its Act  
129 Phase V Energy Efficiency and  
Conservation Plan

Docket No. M-2025-3057327

Dear Secretary Homsher:

Attached for electronic filing, please find the Office of Consumer Advocate's Notice of Intervention and Public Statement in this proceeding.

Copies have been served on the parties as indicated on the enclosed Certificate of Service.

Respectfully submitted,

/s/ Katie Kennedy  
Katherine "Katie" Kennedy, Esq.  
Assistant Consumer Advocate  
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Enclosures

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Certificate of Service

CERTIFICATE OF SERVICE

Petition of First Energy Pennsylvania :  
Electric Company for Approval of its Act : Docket No. M-2025-3057327  
129 Phase V Energy Efficiency and :  
Conservation Plan :  
:

I hereby certify that I have this day filed electronically on the Commission’s electronic filing system and served a true copy of the following document, the Office of Consumer Advocate’s Notice of Intervention and Public Statement, upon parties of record in this proceeding in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant), in the manner and upon the persons listed below.

Dated this 15<sup>th</sup> day of December, 2025.

SERVICE BY E-MAIL ONLY

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Dated: December 15, 2025

/s/ Katie Kennedy  
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Counsel for:  
Darryl Lawrence  
Consumer Advocate

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Petition of First Energy Pennsylvania :  
Electric Company for Approval of : Docket No. M-2025-3057327  
Its Act 129 Phase V Energy Efficiency and :  
Conservation Plan :

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NOTICE OF INTERVENTION  
OF THE  
OFFICE OF CONSUMER ADVOCATE

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Pursuant to 52 Pa. Code Sections 5.71-5.74 and 71 P.S. Sec. 309-4, the Office of Consumer Advocate hereby intervenes in the above-captioned proceeding through this Notice of Intervention and Public Statement. A copy of all correspondence and notices, documents, orders or other communications with respect to the above-captioned proceeding should be addressed to the undersigned counsel at the contact information shown in the signature line.

Respectfully submitted,

Counsel for:  
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Office of Consumer Advocate

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Dated: December 15, 2025

/s/ Katie Kennedy  
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PA Attorney I.D. # 317237

Janna E. Williams, Esq.  
Assistant Consumer Advocate  
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Josiah B. Harmar  
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PUBLIC STATEMENT OF THE OFFICE OF CONSUMER ADVOCATE  
PURSUANT TO 71 P.S. SECTION 309-4(e)

Act 161 of the Pennsylvania General Assembly, 71 P.S. Section 309-2, as enacted July 9, 1976, authorizes the Consumer Advocate to represent the interests of consumers before the Pennsylvania Public Utility Commission (Commission). In accordance with Act 161, and for the following reasons, the Consumer Advocate determined to intervene and participate in the Petition of First Energy Electric Company (FE PA or the Company) for Approval of Its Act 129 Phase V Energy Efficiency and Conservation Plan (Petition).

On November 26, 2025, FE PA filed the Petition, pursuant to Section 2806.1 of the Public Utility Code and pursuant to the Implementation Order entered by the Commission at Docket No. M-2025-3052826 on June 18, 2025. The five-year costs of FE PA's EE&C Phase V Plan (June 1, 2026, through May 31, 2031) are projected to be \$390.3 million. Petition at 23. FE PA claims that its Phase V programs are designed to produce: (1) 1,097,605 MWh in energy savings, or 15% of FE PA's overall energy and peak demand reduction targets each year; and (2) 191 MW of peak demand reduction (PDR), or 75% of the peak demand reduction target in each season. FE PA St. 1 at 28-29. With respect to residential customers, FE PA has proposed extending two of its residential market rate components (Appliance Recycling Component and Student Energy Efficiency Education Component) from Phase IV Plans to be dedicated low-income components under the Residential Resource Constrained Program. Petition at 26, 34.

The Consumer Advocate determined to intervene in this proceeding to protect the interests of FE PA's customers; to ensure that the proposed Plan and programs are in accordance with Act 129 and all other applicable statutes, regulations, and Commission Orders; to ensure that any changes in service resulting from the adoption of the proposed programs are safe, reasonable,

adequate, and efficient; and to ensure that any changes in rates resulting from the adoption of the proposed programs and any related expenses are just and reasonable.