



Todd S. Stewart
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Regulation is a maze. We can show you the way!

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January 22, 2026

VIA ELECTRONIC FILING

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

RE: Sunrise Energy, LLC v. FirstEnergy Pennsylvania Electric Company; Docket No. C-2025-3056807; **MOTION OF SUNRISE ENERGY, LLC FOR SANCTIONS REQUIRING APPROPRIATE RESPONSES TO INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS, SET I AND SET II**

Dear Secretary Homsher:

Enclosed for filing with the Pennsylvania Public Utility Commission is the Motion of Sunrise Energy, LLC for Sanctions Requiring Appropriate Responses to Interrogatories and Requests for Production of Documents, Set I, Nos. 6 and 7; and Set II, Nos. 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 15, 16, 17, 20, 21 and 22 in the above-captioned matter. A copy of this Motion has been served as indicated on the attached Certificate of Service.

Thank you for your attention to this matter. If you have any questions related to this filing, please do not hesitate to contact my office.

Very truly yours,

A handwritten signature in blue ink, appearing to read "Todd S. Stewart", is written over a horizontal line.

Todd S. Stewart
Counsel for Sunrise Energy, LLC

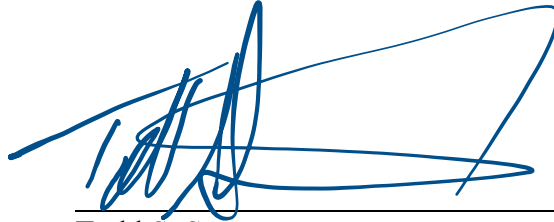
TSS/jld
Enclosure
cc: Per Certificate of Service

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the foregoing document upon the parties, listed below, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a party).

VIA ELECTRONIC MAIL

Timothy McHugh, Esquire
FirstEnergy Service Company
341 White Pond Drive
Akron, OH 044320
tmchugh@firstenergycorp.com
*Counsel for FirstEnergy Pennsylvania Electric
Company*



Todd S. Stewart

DATED: January 22, 2026

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Sunrise Energy, LLC,	:
Complainant,	:
	:
v.	:
	:
FirstEnergy Pennsylvania Electric Company,	:
Respondent.	:

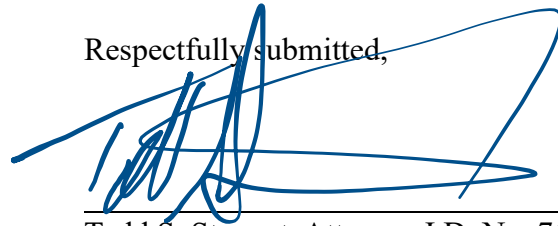
Docket No. C-2025-3056807

NOTICE TO PLEAD

TO: FirstEnergy Pennsylvania Electric Company
c/o Timothy McHugh, Esquire
FirstEnergy Service Company
341 White Pond Drive
Akron, OH 044320

Pursuant to 52 Pa. Code §5.371, you are hereby notified that Sunrise Energy, LLC has filed a Motion for Sanctions in the above matter to which you may file an Answer within five (5) days of service by the Pennsylvania Public Utility Commission, unless otherwise provided in Title 52 of the Pennsylvania Code. All Pleadings such as any Answer to this Motion must be filed with the Secretary of the Pennsylvania Public Utility Commission, with a copy served on the undersigned counsel for Sunrise Energy, LLC.

Respectfully submitted,



Todd S. Stewart, Attorney I.D. No. 75556
HMS Legal LLP
501 Corporate Circle, Suite 302
Harrisburg, PA 17110
Phone: (717) 236-1300
Fax: (717) 236-4841
tsstewart@hmslegal.com

Counsel for Sunrise Energy, LLC

DATED: January 22, 2026

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Sunrise Energy, LLC,	:	
Complainant,	:	
	:	
v.	:	Docket No. C-2025-3056807
	:	
FirstEnergy Pennsylvania Electric Company,	:	
Respondent.	:	

**MOTION OF SUNRISE ENERGY, LLC
FOR SANCTIONS
REQUIRING APPROPRIATE RESPONSES
TO INTERROGATORIES AND REQUESTS
FOR PRODUCTION OF DOCUMENTS, SET I, NOS. 6 AND 7,
AND SET II, NOS. 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 15, 16, 17, 20, 21 AND 22**

NOW COMES Sunrise Energy, LLC (“Sunrise”), by and through its counsel, HMS Legal LLP, and hereby submits this Motion to Compel compliance pursuant to the Commission’s regulations at 52 Pa. Code § 5.342, 52 Pa. Code § 5.371 and 52 Pa. Code § 102.4(h). As more fully described below, Sunrise served certain interrogatories (Sets I & II) upon FirstEnergy Pennsylvania Electric Company (“FEPA”) in the above-captioned Complaint matter. FEPA responded to the majority of the requests with the following, providing no further answer and providing no objection:

The information requested is confidential security information, as defined by the Public Utility Confidential Security Information Disclosure Protection Act, 35 P.S. §§ 2141.1 — 2141.6, the disclosure of which would compromise security against sabotage or criminal or terrorist acts and the nondisclosure of which is necessary for the protection of life, safety, public property or FE PA’s facilities. Furthermore, such information is classified as Bulk Electric System Cyber System Information (“BCSI”) under NERC CIP-011-3 and/or Critical Energy Infrastructure Information under 18

C.F.R. § 388.112. Therefore, it is subject to strict information protection requirements to prevent unauthorized access that could compromise the reliability or security of the Bulk Electric System.

Such a response is akin to an objection, but does not follow the procedure for objections, nor was it submitted within the allotted time for submitting an objection, nor does the response even address, let alone respond to the requests (attached hereto as **Exhibits 1 and 2**).

The Commission's regulations contain a process to address the situation where a party does not submit sufficient answers to interrogatories, or when such non-answers are submitted in lieu of an objection, outside the prescribed time limits for objections.¹

The claims asserted in FEPA's response are also lacking in merit, in that there is no demonstrated basis other than a bald assertion that any of the information requested would lead to any harm to FEPA facilities or lead to any sort of attack. Moreover, the Commission's CSI regulations include a mandatory mechanism for addressing allegations of Confidential Security Information and require the utility to seek a protective order (52 Pa. Code § 102.4(h)). FEPA has not sought a protective order in this matter.

Sunrise contends that FEPA's tactic of not answering the request, not filing an objection and not seeking a protective order in non-compliance of the applicable regulatory requirements causes harm to Sunrise in that it allows FEPA to assert claims (that Sunrise's projects will require expensive system upgrades) in this matter and then assert that the evidence necessary to prove the claim is beyond the reach of the Complainant. This whipsaw approach is a direct violation of procedural due process and should not be countenanced by this Commission. FEPA must be required to make some accommodation to allow Complainant to review the requested information

¹ 52 Pa. Code § 5.371.

or Complainant will be deprived of the ability to fully prosecute its complaint. In support of this Motion for Sanctions, Complainant avers as follows:

1. On or about August 11, 2025, Sunrise filed a Formal Complaint with the Commission regarding a dispute over the results of FEPA's Feasibility Study for three net metering projects proposed for FEPA's service territory among other allegations.

2. On or about September 23, 2025, FEPA answered the Formal Complaint.

3. On or about September 3, 2025, Sunrise propounded Set I Interrogatories on FEPA.

4. On or about September 4, 2025, Sunrise propounded Set II Interrogatories on FEPA.

5. On or about September 23, 2025, FEPA responded to Sunrise's Set I and on September 24, 2025, responded to Sunrise's Set II. Each Set of responses contained the paragraph quoted above. In responding to Set I, two out of nine of the responses, Nos. 6 and 7, and in the response to Set II, of 22 requests, only 4 (Nos. 13,14, 18 & 19) did not have the quoted paragraph as the sole response.

6. At issue in the Complaint matter is the result of FEPA's feasibility studies that by their nature are complex. Nonetheless, FEPA cannot be permitted to mask any review or exploration of its conclusions by depriving the developer, in this case, Sunrise, of any of the information that would be needed to review the basis for FEPA's conclusions. Otherwise, there is no recourse, and FEPA can deny or approve projects at will without the ability of a party that disagrees with FEPA's conclusions to reasonably understand the basis of FEPA's demanded remediation.

7. As discussed above FEPA claims that certain information is beyond the reach of Sunrise, lack merit. FEPA's answer was framed in a manner that is contrary to the express

requirements of the regulations and appears calculated to deny Sunrise the recourse that is specifically provided for in the Commission's regulations concerning confidential security information (CSI), or discovery in general. The Commission's regulation specify that in adversarial proceedings, if information is requested by a party and the utility from whom it is requested asserts that the information is CSI, then the utility must seek a protective order. 52 Pa. Code § 102.4(h).² The regulation is clear that if FEPA claims that information is CSI, it must seek a protective order. FEPA has not sought a protective order in this proceeding.

8. With settlement being unachievable,³ in order to prosecute its Complaint, Sunrise needs the information requested in Sets I and II, to which FEPA has refused to answer but not objected. The regulations require that FEPA request a protective order,⁴ but FEPA did not and instead provided a non-answer.

9. The claims FEPA makes in the referenced paragraph are also non-applicable in a PUC proceeding and provide no further protection for FEPA.⁵

10. The Commission's regulations permit the filing of a Motion to Compel in the situation where a party submits an objection to an interrogatory,⁶ but FEPA did not object and is thus required to answer the question – it has not. This motion seeks to compel FEPA to comply

² Section 102.4(h) provides:

Discovery requests in adversarial proceedings. The challenge and request to review procedures described in this chapter do not apply to exchanges of documents among parties in adversarial proceedings pending before the Commission. In adversarial proceedings, a party wishing to limit availability of records containing confidential security information must move for an appropriate protective order before the presiding officer in accordance with accepted rules and procedures for issuing protective orders.

³ The Parties delayed litigation and attempted to settle this matter, but those efforts proved to be unsuccessful.

⁴ 52 Pa. Code § 102.4(h).

⁵ The reference to FERC's regulations applies only in proceedings before the FERC and the NERC citation likewise is inapplicable in a Commission proceeding.

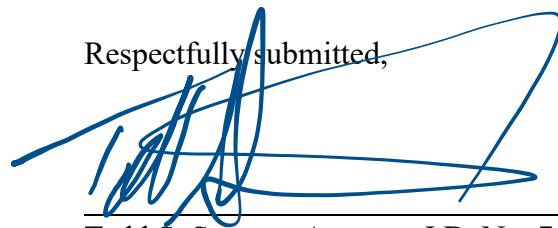
⁶ 52 Pa. Code § 5.342.

with the regulation and answer the request and, to seek a protective order as required, that will allow Sunrise access to the information to which it is entitled.

11. Sunrise requests FEPA be required to answer Sunrise's Set I, Nos. 6 and 7; and Sunrise's Set II, Nos. 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 15, 16, 17, 20, 21 and 22.

WHEREFORE, Sunrise requests that the presiding administrative law judge impose the sanction of requiring FEPA to answer the requests to which it has not properly objected and which it has not answered. To the extent that FEPA believes that a protective order is required, Sunrise can agree to an appropriate order that will allow it to review the information requested subject to whatever reasonable non-disclosure requirements may be appropriate.

Respectfully submitted,



Todd S. Stewart, Attorney I.D. No. 75556
HMS Legal LLP
501 Corporate Circle, Suite 302
Harrisburg, PA 17110
Phone: (717) 236-1300
Fax: (717) 236-4841
tsstewart@hmslegal.com

Counsel for Sunrise Energy, LLC

DATED: January 22, 2026

EXHIBIT 1



341 White Pond Drive
Akron, OH 44320

Timothy K. McHugh, Esq.
(610) 301-9072
(330) 315-9263 (fax)

September 23, 2025

VIA ELECTRONIC MAIL

Todd S. Stewart
HMS Legal LLP
tsstewart@hmslegal.com

Re: Sunrise Energy, LLC v. FirstEnergy Pennsylvania Electric Company
Docket Nos. C-2025-3056807

Dear Attorney Stewart:

Enclosed please find the Responses of FirstEnergy Pennsylvania Electric Company (“the Company”) to the Interrogatories and Request for Production of Documents, Set I, Nos. 1 through 9, propounded by Sunrise Energy, LLC regarding the above-referenced proceeding.

Kindly contact me should you have any questions regarding the enclosed.

Sincerely,

A handwritten signature in blue ink that reads "Timothy K. McHugh".

Timothy K. McHugh

TKM/krak

cc: Matthew Homsher, Secretary (Cover Letter and Certificate of Service only, via e-filing)
Certificate of Service

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

SUNRISE ENERGY, LLC

v.

**FIRSTENERGY PENNSYLVANIA
ELECTRIC COMPANY**

:
:
:
:
:
:

Docket No. C-2025-3056807

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the Responses of FirstEnergy Pennsylvania Electric Company to the Interrogatories, Set I, Nos. 1 through 9, propounded by Sunrise Energy, LLC upon the individuals listed below, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

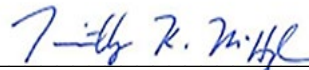
Service by electronic mail as follows:

Todd S. Stewart, Esquire
HMS Legal LLP
tsstewart@hmslegal.com

Counsel for Sunrise Energy, LLC

Date: September 23, 2025

Respectfully submitted,



Timothy K. McHugh
FirstEnergy Service Company
341 White Pond Drive
Akron, OH 44320
(610)-301-9072
tmchugh@firstenergycorp.com

Counsel for FirstEnergy Pennsylvania
Electric Company

SUNRISE ENERGY, LLC
v.
FIRSTENERGY PENNSYLVANIA ELECTRIC COMPANY
Docket No. C-2025-3056807

SUNRISE INTERROGATORY SET I, NO. 1:

Identify the brand and title of the software used to perform the impact studies for each project, along with the version number and all optional modules that were utilized in studying the projects.

RESPONSE:

FirstEnergy Pennsylvania Electric Company (“FE PA” or the “Company”) currently utilizes Eaton CYME 9.2 Rev4 to perform distributed energy resource (“DER”) studies connecting to distribution circuits. Additional modules include:

- **CYMCAP Cable ampacity calculations**
- **CUMCAP Multiple Duct banks Backfills**
- **CYME Distribution Analysis**
- **CYME Enhanced Substation Modeling**
- **CYME Harmonic Analysis**
- **CYME Integration Capacity Analysis**
- **CYME Long-Term Dynamic Analysis**
- **CUME Low Voltage Secondary Distribution**
- **CYME Network Configuration Optimization**
- **CYME Network Editors**
- **CYME Online Maps Services**
- **CYME Protective Device Analysis**
- **CYME Reliability Assessment**
- **CYME Scripting Tool With Python/Runtime**
- **CYME Secondary Grid Network Analysis**
- **CYME Transient Stability Analysis**
- **CYMETCC Protective Device Coordination**

General Electric PSLF version 23.0.6 is also utilized for studying load flow on networked facilities connecting at 23kV and above. Siemens Gridscale X Advanced Protection Assessment Version 15.1.37 is used in conjunction with PSLF for fault current analysis.

SUNRISE ENERGY, LLC
v.
FIRSTENERGY PENNSYLVANIA ELECTRIC COMPANY
Docket No. C-2025-3056807

SUNRISE INTERROGATORY SET I, NO. 2:

How many individuals are assigned to performing such studies for First Energy?

RESPONSE:

There are currently 47 individuals assigned to perform net metering feasibility studies interconnecting to distribution voltage classes for FE PA.

SUNRISE ENERGY, LLC
v.
METROPOLITAN EDISON COMPANY
Docket No. C-2025-3056807

SUNRISE INTERROGATORY SET I, NO. 3:

Are the individuals conducting the studies required to have a certain level of training and education? If yes, what are the minimum education and training requirements? What level of training do the individuals who conducted the studies listed in Sunrise' Complaint have? What level of experience do they have in the interconnection of distributed energy resources?

RESPONSE:

Individuals conducting net metering feasibility studies are required to have a minimum of a bachelor's degree in engineering or engineering technology from an Accreditation Board of Engineering Technology institution. The individuals who conducted the net metering feasibility studies for the projects in question all had the required training and education to perform such studies. The experience of these individuals ranges from two to twenty-four years in electrical system engineering, including for interconnection purposes.

SUNRISE ENERGY, LLC
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Docket No. C-2025-3056807

SUNRISE INTERROGATORY SET I, NO. 4:

How many man-hours did FEPA personnel spend on each study? Over what timespan?

RESPONSE:

On average, each study requires approximately 40 hours to complete. This work is performed between receipt of the eligibility approval letter from the Pennsylvania Public Utility Commission and the Company's issuance of the net metering feasibility study results.

SUNRISE ENERGY, LLC
v.
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Docket No. C-2025-3056807

SUNRISE INTERROGATORY SET I, NO. 5:

Are studies reviewed by FEPA personnel after they are produced to ensure correctness and accuracy? If so, by whom?

RESPONSE:

Yes, studies are reviewed by FE PA an engineering services supervisor.

SUNRISE ENERGY, LLC
v.
METROPOLITAN EDISON COMPANY
Docket No. C-2025-3056807

SUNRISE INTERROGATORY SET I, NO. 6:

Please provide all files necessary to replicate the study using the same or compatible software.

RESPONSE:

The information requested is confidential security information, as defined by the Public Utility Confidential Security Information Disclosure Protection Act, 35 P.S. §§ 2141.1 — 2141.6, the disclosure of which would compromise security against sabotage or criminal or terrorist acts and the nondisclosure of which is necessary for the protection of life, safety, public property or FE PA’s facilities. Furthermore, such information is classified as Bulk Electric System Cyber System Information (“BCSI”) under NERC CIP-011-3 and/or Critical Energy Infrastructure Information under 18 C.F.R. § 388.112. Therefore, it is subject to strict information protection requirements to prevent unauthorized access that could compromise the reliability or security of the Bulk Electric System.

SUNRISE ENERGY, LLC
v.
METROPOLITAN EDISON COMPANY
Docket No. C-2025-3056807

SUNRISE INTERROGATORY SET I, NO. 7:

Please provide all grid parameters and assumptions employed while modeling the projects.

RESPONSE:

The information requested is confidential security information, as defined by the Public Utility Confidential Security Information Disclosure Protection Act, 35 P.S. §§ 2141.1 — 2141.6, the disclosure of which would compromise security against sabotage or criminal or terrorist acts and the nondisclosure of which is necessary for the protection of life, safety, public property or FE PA’s facilities. Furthermore, such information is classified as Bulk Electric System Cyber System Information (“BCSI”) under NERC CIP-011-3 and/or Critical Energy Infrastructure Information under 18 C.F.R. § 388.112. Therefore, it is subject to strict information protection requirements to prevent unauthorized access that could compromise the reliability or security of the Bulk Electric System.

SUNRISE ENERGY, LLC
v.
METROPOLITAN EDISON COMPANY
Docket No. C-2025-3056807

SUNRISE INTERROGATORY SET I, NO. 8:

Specify all equipment/technology (e.g. bi-directional voltage regulators) that were considered when formulating FEPA's proposed mitigation strategy.

RESPONSE:

FE PA utilized industry standard utility equipment, in alignment with other FE PA practices, when formulating its mitigation strategies for the projects in question. A list of standard equipment that may be used as a mitigation measure for adverse effects of generator interconnections includes, but is not limited to:

- Regulators;
- Capacitors;
- Conductors;
- Fuses;
- Reclosers/breakers;
- Relays; and
- Transformers.

SUNRISE ENERGY, LLC
v.
METROPOLITAN EDISON COMPANY
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SUNRISE INTERROGATORY SET I, NO. 9:

Are there any technologies (e.g. batteries) that were not considered in FEPA's mitigation strategy, and if not, why ?

RESPONSE:

See FE PA's response to Sunrise Interrogatory Set I, No. 8, above, regarding equipment that is considered for mitigation strategies of criteria violations because of a generator's interconnection to the utility system. New technologies are considered upon changes to regulatory requirements and when the technologies have developed to scale with a proven track record of successful deployment in a particular application.

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

SUNRISE ENERGY, LLC	:	
Complainant	:	
	:	
v.	:	Docket No. C-2025-3056807
	:	
FIRSTENERGY PENNSYLVANIA	:	
ELECTRIC COMPANY	:	
Respondent	:	

VERIFICATION

I, Neil Trout, 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 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.

September 23, 2025
Date

Neil Trout
Neil Trout

EXHIBIT 2



341 White Pond Drive
Akron, OH 44320

Timothy K. McHugh, Esq.
(610) 301-9072
(330) 315-9263 (fax)

September 24, 2025

VIA ELECTRONIC MAIL

Todd S. Stewart
HMS Legal LLP
tsstewart@hmslegal.com

Re: Sunrise Energy, LLC v. FirstEnergy Pennsylvania Electric Company
Docket Nos. C-2025-3056807

Dear Attorney Stewart:

Enclosed please find the Responses of FirstEnergy Pennsylvania Electric Company (“the Company”) to the Interrogatories and Request for Production of Documents, Set II, Nos. 1 through 22, propounded by Sunrise Energy, LLC regarding the above-referenced proceeding.

Kindly contact me should you have any questions regarding the enclosed.

Sincerely,

Timothy K. McHugh

TKM/krak

cc: Matthew Homsher, Secretary (Cover Letter and Certificate of Service only, via e-filing)
Certificate of Service

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

SUNRISE ENERGY, LLC

v.

**FIRSTENERGY PENNSYLVANIA
ELECTRIC COMPANY**

:
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:
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Docket No. C-2025-3056807

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the Responses of FirstEnergy Pennsylvania Electric Company to the Interrogatories, Set II, Nos. 1 through 22, propounded by Sunrise Energy, LLC, the individuals listed below, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

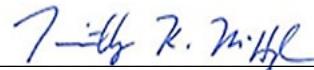
Service by electronic mail as follows:

Todd S. Stewart, Esquire
HMS Legal LLP
tsstewart@hmslegal.com

Counsel for Sunrise Energy, LLC

Date: September 24, 2025

Respectfully submitted,



Timothy K. McHugh
FirstEnergy Service Company
341 White Pond Drive
Akron, OH 44320
(610)-301-9072
tmchugh@firstenergycorp.com

Counsel for FirstEnergy Pennsylvania
Electric Company

SUNRISE ENERGY, LLC
v.
FIRSTENERGY PENNSYLVANIA ELECTRIC COMPANY
Docket No. C-2025-3056807

SUNRISE INTERROGATORY SET II, NO. 1:

Mercer Substation: W-129 (PP-GENIC-1435 – Sunrise Babcock Road LLC)
Harlan Substation: D-344 (PP-GENIC-1437 – Sunrise Glenn LLC)
Perry Substation: W-157 (PP-GENIC-1457 – Sunrise Thompson Road LLC)

Please provide the following information for each of the three projects listed

Provide Substation transformer model number and serial number.

RESPONSE:

The information requested is confidential security information, as defined by the Public Utility Confidential Security Information Disclosure Protection Act, 35 P.S. §§ 2141.1 — 2141.6, the disclosure of which would compromise security against sabotage or criminal or terrorist acts and the nondisclosure of which is necessary for the protection of life, safety, public property or FE PA’s facilities. Furthermore, such information is classified as Bulk Electric System Cyber System Information (“BCSI”) under NERC CIP-011-3 and/or Critical Energy Infrastructure Information under 18 C.F.R. § 388.112. Therefore, it is subject to strict information protection requirements to prevent unauthorized access that could compromise the reliability or security of the Bulk Electric System.

SUNRISE ENERGY, LLC
v.
FIRSTENERGY PENNSYLVANIA ELECTRIC COMPANY
Docket No. C-2025-3056807

SUNRISE INTERROGATORY SET II, NO. 2:

Mercer Substation: W-129 (PP-GENIC-1435 – Sunrise Babcock Road LLC)
Harlan Substation: D-344 (PP-GENIC-1437 – Sunrise Glenn LLC)
Perry Substation: W-157 (PP-GENIC-1457 – Sunrise Thompson Road LLC)

Please provide the following information for each of the three projects listed

Provide Substation transformer settings.

RESPONSE:

The information requested is confidential security information, as defined by the Public Utility Confidential Security Information Disclosure Protection Act, 35 P.S. §§ 2141.1 — 2141.6, the disclosure of which would compromise security against sabotage or criminal or terrorist acts and the nondisclosure of which is necessary for the protection of life, safety, public property or FE PA’s facilities. Furthermore, such information is classified as Bulk Electric System Cyber System Information (“BCSI”) under NERC CIP-011-3 and/or Critical Energy Infrastructure Information under 18 C.F.R. § 388.112. Therefore, it is subject to strict information protection requirements to prevent unauthorized access that could compromise the reliability or security of the Bulk Electric System.

SUNRISE ENERGY, LLC
v.
METROPOLITAN EDISON COMPANY
Docket No. C-2025-3056807

SUNRISE INTERROGATORY SET II, NO. 3:

Mercer Substation: W-129 (PP-GENIC-1435 – Sunrise Babcock Road LLC)
Harlan Substation: D-344 (PP-GENIC-1437 – Sunrise Glenn LLC)
Perry Substation: W-157 (PP-GENIC-1457 – Sunrise Thompson Road LLC)

Please provide the following information for each of the three projects listed

Provide the tap setting ranges for the substation transformer.

RESPONSE:

The information requested is confidential security information, as defined by the Public Utility Confidential Security Information Disclosure Protection Act, 35 P.S. §§ 2141.1 — 2141.6, the disclosure of which would compromise security against sabotage or criminal or terrorist acts and the nondisclosure of which is necessary for the protection of life, safety, public property or FE PA’s facilities. Furthermore, such information is classified as Bulk Electric System Cyber System Information (“BCSI”) under NERC CIP-011-3 and/or Critical Energy Infrastructure Information under 18 C.F.R. § 388.112. Therefore, it is subject to strict information protection requirements to prevent unauthorized access that could compromise the reliability or security of the Bulk Electric System.

SUNRISE ENERGY, LLC
v.
METROPOLITAN EDISON COMPANY
Docket No. C-2025-3056807

SUNRISE INTERROGATORY SET II, NO. 4:

Mercer Substation: W-129 (PP-GENIC-1435 – Sunrise Babcock Road LLC)
Harlan Substation: D-344 (PP-GENIC-1437 – Sunrise Glenn LLC)
Perry Substation: W-157 (PP-GENIC-1457 – Sunrise Thompson Road LLC)

Please provide the following information for each of the three projects listed

Provide Substation voltage regulator model number and serial number.

RESPONSE:

The information requested is confidential security information, as defined by the Public Utility Confidential Security Information Disclosure Protection Act, 35 P.S. §§ 2141.1 — 2141.6, the disclosure of which would compromise security against sabotage or criminal or terrorist acts and the nondisclosure of which is necessary for the protection of life, safety, public property or FE PA’s facilities. Furthermore, such information is classified as Bulk Electric System Cyber System Information (“BCSI”) under NERC CIP-011-3 and/or Critical Energy Infrastructure Information under 18 C.F.R. § 388.112. Therefore, it is subject to strict information protection requirements to prevent unauthorized access that could compromise the reliability or security of the Bulk Electric System.

SUNRISE ENERGY, LLC
v.
METROPOLITAN EDISON COMPANY
Docket No. C-2025-3056807

SUNRISE INTERROGATORY SET II, NO. 5:

Mercer Substation: W-129 (PP-GENIC-1435 – Sunrise Babcock Road LLC)
Harlan Substation: D-344 (PP-GENIC-1437 – Sunrise Glenn LLC)
Perry Substation: W-157 (PP-GENIC-1457 – Sunrise Thompson Road LLC)

Please provide the following information for each of the three projects listed

Provide Voltage regulator settings.

RESPONSE:

The information requested is confidential security information, as defined by the Public Utility Confidential Security Information Disclosure Protection Act, 35 P.S. §§ 2141.1 — 2141.6, the disclosure of which would compromise security against sabotage or criminal or terrorist acts and the nondisclosure of which is necessary for the protection of life, safety, public property or FE PA’s facilities. Furthermore, such information is classified as Bulk Electric System Cyber System Information (“BCSI”) under NERC CIP-011-3 and/or Critical Energy Infrastructure Information under 18 C.F.R. § 388.112. Therefore, it is subject to strict information protection requirements to prevent unauthorized access that could compromise the reliability or security of the Bulk Electric System.

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SUNRISE INTERROGATORY SET II, NO. 6:

Mercer Substation: W-129 (PP-GENIC-1435 – Sunrise Babcock Road LLC)
Harlan Substation: D-344 (PP-GENIC-1437 – Sunrise Glenn LLC)
Perry Substation: W-157 (PP-GENIC-1457 – Sunrise Thompson Road LLC)

Please provide the following information for each of the three projects listed

Provide the setting ranges of the voltage regulator.

RESPONSE:

The information requested is confidential security information, as defined by the Public Utility Confidential Security Information Disclosure Protection Act, 35 P.S. §§ 2141.1 — 2141.6, the disclosure of which would compromise security against sabotage or criminal or terrorist acts and the nondisclosure of which is necessary for the protection of life, safety, public property or FE PA’s facilities. Furthermore, such information is classified as Bulk Electric System Cyber System Information (“BCSI”) under NERC CIP-011-3 and/or Critical Energy Infrastructure Information under 18 C.F.R. § 388.112. Therefore, it is subject to strict information protection requirements to prevent unauthorized access that could compromise the reliability or security of the Bulk Electric System.

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SUNRISE INTERROGATORY SET II, NO. 7:

Mercer Substation: W-129 (PP-GENIC-1435 – Sunrise Babcock Road LLC)
Harlan Substation: D-344 (PP-GENIC-1437 – Sunrise Glenn LLC)
Perry Substation: W-157 (PP-GENIC-1457 – Sunrise Thompson Road LLC)

Please provide the following information for each of the three projects listed

Provide a complete scaled circuit map of the circuit. Please include locations of:

- Recloser
- Capacitor Banks
- Voltage Regulators and Beckwith Controllers
- Switching
- Wire size
- Pole locations

RESPONSE:

The information requested is confidential security information, as defined by the Public Utility Confidential Security Information Disclosure Protection Act, 35 P.S. §§ 2141.1 — 2141.6, the disclosure of which would compromise security against sabotage or criminal or terrorist acts and the nondisclosure of which is necessary for the protection of life, safety, public property or FE PA’s facilities. Furthermore, such information is classified as Bulk Electric System Cyber System Information (“BCSI”) under NERC CIP-011-3 and/or Critical Energy Infrastructure Information under 18 C.F.R. § 388.112. Therefore, it is subject to strict information protection requirements to prevent unauthorized access that could compromise the reliability or security of the Bulk Electric System.

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SUNRISE INTERROGATORY SET II, NO. 8:

Mercer Substation: W-129 (PP-GENIC-1435 – Sunrise Babcock Road LLC)
Harlan Substation: D-344 (PP-GENIC-1437 – Sunrise Glenn LLC)
Perry Substation: W-157 (PP-GENIC-1457 – Sunrise Thompson Road LLC)

Please provide the following information for each of the three projects listed

Provide recloser model number serial number and settings on the circuit.

RESPONSE:

The information requested is confidential security information, as defined by the Public Utility Confidential Security Information Disclosure Protection Act, 35 P.S. §§ 2141.1 — 2141.6, the disclosure of which would compromise security against sabotage or criminal or terrorist acts and the nondisclosure of which is necessary for the protection of life, safety, public property or FE PA’s facilities. Furthermore, such information is classified as Bulk Electric System Cyber System Information (“BCSI”) under NERC CIP-011-3 and/or Critical Energy Infrastructure Information under 18 C.F.R. § 388.112. Therefore, it is subject to strict information protection requirements to prevent unauthorized access that could compromise the reliability or security of the Bulk Electric System.

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SUNRISE INTERROGATORY SET II, NO. 9:

Mercer Substation: W-129 (PP-GENIC-1435 – Sunrise Babcock Road LLC)
Harlan Substation: D-344 (PP-GENIC-1437 – Sunrise Glenn LLC)
Perry Substation: W-157 (PP-GENIC-1457 – Sunrise Thompson Road LLC)

Please provide the following information for each of the three projects listed

Provide capacitor bank model number, serial number and settings on the circuit.

RESPONSE:

The information requested is confidential security information, as defined by the Public Utility Confidential Security Information Disclosure Protection Act, 35 P.S. §§ 2141.1 — 2141.6, the disclosure of which would compromise security against sabotage or criminal or terrorist acts and the nondisclosure of which is necessary for the protection of life, safety, public property or FE PA’s facilities. Furthermore, such information is classified as Bulk Electric System Cyber System Information (“BCSI”) under NERC CIP-011-3 and/or Critical Energy Infrastructure Information under 18 C.F.R. § 388.112. Therefore, it is subject to strict information protection requirements to prevent unauthorized access that could compromise the reliability or security of the Bulk Electric System.

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SUNRISE INTERROGATORY SET II, NO. 10:

Mercer Substation: W-129 (PP-GENIC-1435 – Sunrise Babcock Road LLC)
Harlan Substation: D-344 (PP-GENIC-1437 – Sunrise Glenn LLC)
Perry Substation: W-157 (PP-GENIC-1457 – Sunrise Thompson Road LLC)

Please provide the following information for each of the three projects listed

Provide voltage regulators and Beckwith Controllers model number, serial number and settings on the circuit.

RESPONSE:

The information requested is confidential security information, as defined by the Public Utility Confidential Security Information Disclosure Protection Act, 35 P.S. §§ 2141.1 — 2141.6, the disclosure of which would compromise security against sabotage or criminal or terrorist acts and the nondisclosure of which is necessary for the protection of life, safety, public property or FE PA’s facilities. Furthermore, such information is classified as Bulk Electric System Cyber System Information (“BCSI”) under NERC CIP-011-3 and/or Critical Energy Infrastructure Information under 18 C.F.R. § 388.112. Therefore, it is subject to strict information protection requirements to prevent unauthorized access that could compromise the reliability or security of the Bulk Electric System.

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SUNRISE INTERROGATORY SET II, NO. 11:

Mercer Substation: W-129 (PP-GENIC-1435 – Sunrise Babcock Road LLC)
Harlan Substation: D-344 (PP-GENIC-1437 – Sunrise Glenn LLC)
Perry Substation: W-157 (PP-GENIC-1457 – Sunrise Thompson Road LLC)

Please provide the following information for each of the three projects listed

Provide switching model number, serial number and settings.

RESPONSE:

The information requested is confidential security information, as defined by the Public Utility Confidential Security Information Disclosure Protection Act, 35 P.S. §§ 2141.1 — 2141.6, the disclosure of which would compromise security against sabotage or criminal or terrorist acts and the nondisclosure of which is necessary for the protection of life, safety, public property or FE PA’s facilities. Furthermore, such information is classified as Bulk Electric System Cyber System Information (“BCSI”) under NERC CIP-011-3 and/or Critical Energy Infrastructure Information under 18 C.F.R. § 388.112. Therefore, it is subject to strict information protection requirements to prevent unauthorized access that could compromise the reliability or security of the Bulk Electric System.

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SUNRISE INTERROGATORY SET II, NO. 12:

Mercer Substation: W-129 (PP-GENIC-1435 – Sunrise Babcock Road LLC)
Harlan Substation: D-344 (PP-GENIC-1437 – Sunrise Glenn LLC)
Perry Substation: W-157 (PP-GENIC-1457 – Sunrise Thompson Road LLC)

Please provide the following information for each of the three projects listed

Provide annual load profile for this circuit.

RESPONSE:

The information requested is confidential security information, as defined by the Public Utility Confidential Security Information Disclosure Protection Act, 35 P.S. §§ 2141.1 — 2141.6, the disclosure of which would compromise security against sabotage or criminal or terrorist acts and the nondisclosure of which is necessary for the protection of life, safety, public property or FE PA’s facilities. Furthermore, such information is classified as Bulk Electric System Cyber System Information (“BCSI”) under NERC CIP-011-3 and/or Critical Energy Infrastructure Information under 18 C.F.R. § 388.112. Therefore, it is subject to strict information protection requirements to prevent unauthorized access that could compromise the reliability or security of the Bulk Electric System.

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SUNRISE INTERROGATORY SET II, NO. 13:

Mercer Substation: W-129 (PP-GENIC-1435 – Sunrise Babcock Road LLC)
Harlan Substation: D-344 (PP-GENIC-1437 – Sunrise Glenn LLC)
Perry Substation: W-157 (PP-GENIC-1457 – Sunrise Thompson Road LLC)

Please provide the following information for each of the three projects listed

Provide policy on project queue position.

RESPONSE:

FEPA follows the queue process identified in the Commission’s regulations at 52 Pa. Code § 75.22, which provides that queue position is “[t]he order of a valid interconnection request, relative to all other pending valid interconnection requests, that is established based upon the date and time of receipt of the valid interconnection request by the EDC.”

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SUNRISE INTERROGATORY SET II, NO. 14:

Mercer Substation: W-129 (PP-GENIC-1435 – Sunrise Babcock Road LLC)
Harlan Substation: D-344 (PP-GENIC-1437 – Sunrise Glenn LLC)
Perry Substation: W-157 (PP-GENIC-1457 – Sunrise Thompson Road LLC)

Please provide the following information for each of the three projects listed

How does FirstEnergy monitor this circuit for voltage rise and how does FE remedy these issues?

RESPONSE:

FE PA utilizes voltage regulators and capacitors to monitor and manage circuit voltage.

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SUNRISE INTERROGATORY SET II, NO. 15:

Mercer Substation: W-129 (PP-GENIC-1435 – Sunrise Babcock Road LLC)
Harlan Substation: D-344 (PP-GENIC-1437 – Sunrise Glenn LLC)
Perry Substation: W-157 (PP-GENIC-1457 – Sunrise Thompson Road LLC)

Please provide the following information for each of the three projects listed

Provide assumptions used when developing the impact study.

RESPONSE:

FE PA cannot disclose the assumptions made when developing the impact study, as we have not issued a document titled system impact study for the three projects referenced.

The information requested is confidential security information, as defined by the Public Utility Confidential Security Information Disclosure Protection Act, 35 P.S. §§ 2141.1 — 2141.6, the disclosure of which would compromise security against sabotage or criminal or terrorist acts and the nondisclosure of which is necessary for the protection of life, safety, public property or FE PA’s facilities. Furthermore, such information is classified as Bulk Electric System Cyber System Information (“BCSI”) under NERC CIP-011-3 and/or Critical Energy Infrastructure Information under 18 C.F.R. § 388.112. Therefore, it is subject to strict information protection requirements to prevent unauthorized access that could compromise the reliability or security of the Bulk Electric System.

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SUNRISE INTERROGATORY SET II, NO. 16:

Mercer Substation: W-129 (PP-GENIC-1435 – Sunrise Babcock Road LLC)
Harlan Substation: D-344 (PP-GENIC-1437 – Sunrise Glenn LLC)
Perry Substation: W-157 (PP-GENIC-1457 – Sunrise Thompson Road LLC)

Please provide the following information for each of the three projects listed

Provide complete CYME analysis.

RESPONSE:

The information requested is confidential security information, as defined by the Public Utility Confidential Security Information Disclosure Protection Act, 35 P.S. §§ 2141.1 — 2141.6, the disclosure of which would compromise security against sabotage or criminal or terrorist acts and the nondisclosure of which is necessary for the protection of life, safety, public property or FE PA’s facilities. Furthermore, such information is classified as Bulk Electric System Cyber System Information (“BCSI”) under NERC CIP-011-3 and/or Critical Energy Infrastructure Information under 18 C.F.R. § 388.112. Therefore, it is subject to strict information protection requirements to prevent unauthorized access that could compromise the reliability or security of the Bulk Electric System.

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SUNRISE INTERROGATORY SET II, NO. 17:

Mercer Substation: W-129 (PP-GENIC-1435 – Sunrise Babcock Road LLC)
Harlan Substation: D-344 (PP-GENIC-1437 – Sunrise Glenn LLC)
Perry Substation: W-157 (PP-GENIC-1457 – Sunrise Thompson Road LLC)

Please provide the following information for each of the three projects listed

Provide calculations that show the feeder voltage anywhere on the circuit exceeding 1.05 pu.

RESPONSE:

The information requested is confidential security information, as defined by the Public Utility Confidential Security Information Disclosure Protection Act, 35 P.S. §§ 2141.1 — 2141.6, the disclosure of which would compromise security against sabotage or criminal or terrorist acts and the nondisclosure of which is necessary for the protection of life, safety, public property or FE PA’s facilities. Furthermore, such information is classified as Bulk Electric System Cyber System Information (“BCSI”) under NERC CIP-011-3 and/or Critical Energy Infrastructure Information under 18 C.F.R. § 388.112. Therefore, it is subject to strict information protection requirements to prevent unauthorized access that could compromise the reliability or security of the Bulk Electric System.

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SUNRISE INTERROGATORY SET II, NO. 18:

Mercer Substation: W-129 (PP-GENIC-1435 – Sunrise Babcock Road LLC)
Harlan Substation: D-344 (PP-GENIC-1437 – Sunrise Glenn LLC)
Perry Substation: W-157 (PP-GENIC-1457 – Sunrise Thompson Road LLC)

Please provide the following information for each of the three projects listed

Provide explanation why Primary Voltage Deviation is analyzed with Cap and taps locked.

RESPONSE:

Assuming “taps” are in reference to voltage regulators and or load tap changers, and “Cap” is in reference to capacitors, Primary Voltage Deviation is analyzed with voltage regulators and capacitors because it would show instantaneous impacts of fluctuating generation to the circuit and substation before the regulator’s load tap changer or Capacitors may have the chance to operate or react.

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SUNRISE INTERROGATORY SET II, NO. 19:

Mercer Substation: W-129 (PP-GENIC-1435 – Sunrise Babcock Road LLC)
Harlan Substation: D-344 (PP-GENIC-1437 – Sunrise Glenn LLC)
Perry Substation: W-157 (PP-GENIC-1457 – Sunrise Thompson Road LLC)

Please provide the following information for each of the three projects listed

Explain why the regulating device voltage deviation can't be kept within the 1.25% tolerance by using controllers to adjust when limit is reached.

RESPONSE:

Assuming the question is in reference to evaluation criteria 3 as listed within table 1 of the feasibility reports provided for the three projects identified above, the 1.25% threshold has been established by FE PA to reduce excessive operation of regulators or load tap changers.

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SUNRISE INTERROGATORY SET II, NO. 20:

Mercer Substation: W-129 (PP-GENIC-1435 – Sunrise Babcock Road LLC)
Harlan Substation: D-344 (PP-GENIC-1437 – Sunrise Glenn LLC)
Perry Substation: W-157 (PP-GENIC-1457 – Sunrise Thompson Road LLC)

Please provide the following information for each of the three projects listed

Please provide all interconnection queue positions for substations in Mercer and Erie counties. If it is necessary to redact certain client information, please do not redact for those of Plaintiff.

RESPONSE:

The Commission’s regulations regarding the Alternative Energy Portfolio Standards (“AEPS”) Act, 52 Pa. Code §§ 75.21 -- 75.72, require the EDC “to notify the interconnection customer at the scoping meeting about the other higher-queued interconnection customers.” 52 Pa. Code § 75.39(b)(3). During its scoping meeting, the Company notifies the interconnection customer about other higher-queued interconnection customers “to determine the cost responsibility necessary for the facilities to accommodate the interconnection.” *Id.* at § 75.39(b)(5). Unless required by the Public Utility Code, Commission regulation or Order, and as a general practice, the Company does not provide specific customer information to third parties without the customer’s consent. Since the queue positions contain specific customer information, the Company does not disclose this information.

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SUNRISE INTERROGATORY SET II, NO. 21:

Mercer Substation: W-129 (PP-GENIC-1435 – Sunrise Babcock Road LLC)
Harlan Substation: D-344 (PP-GENIC-1437 – Sunrise Glenn LLC)
Perry Substation: W-157 (PP-GENIC-1457 – Sunrise Thompson Road LLC)

Please provide the following information for each of the three projects listed

Please provide any regulatory or statutory authorizations that affirm FEPA’s right to keep AEPS Act queue positions confidential.

RESPONSE:

The Commission’s regulations regarding the AEPS Act, 52 Pa. Code §§ 75.21 -- 75.72, require the EDC “to notify the interconnection customer at the scoping meeting about the other higher-queued interconnection customers.” 52 Pa. Code § 75.39(b)(3). During its scoping meeting, the Company notifies the interconnection customer about other higher-queued interconnection customers “to determine the cost responsibility necessary for the facilities to accommodate the interconnection.” *Id.* at § 75.39(b)(5). Unless required by the Public Utility Code, Commission regulation or Order, and as a general practice, the Company does not provide specific customer information to third parties without the customer’s consent. Since the queue positions contain specific customer information, the Company does not disclose this information.

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SUNRISE INTERROGATORY SET II, NO. 22

Mercer Substation: W-129 (PP-GENIC-1435 – Sunrise Babcock Road LLC)
Harlan Substation: D-344 (PP-GENIC-1437 – Sunrise Glenn LLC)
Perry Substation: W-157 (PP-GENIC-1457 – Sunrise Thompson Road LLC)

Please provide the following information for each of the three projects listed

Please provide any documentation from Plaintiff where confidentiality was requested with regard to the projects in question.

RESPONSE:

The Commission’s regulations regarding the AEPS Act, 52 Pa. Code §§ 75.21 -- 75.72, require the EDC “to notify the interconnection customer at the scoping meeting about the other higher-queued interconnection customers.” 52 Pa. Code § 75.39(b)(3). During its scoping meeting, the Company notifies the interconnection customer about other higher-queued interconnection customers “to determine the cost responsibility necessary for the facilities to accommodate the interconnection.” *Id.* at § 75.39(b)(5). Unless required by the Public Utility Code, Commission regulation or Order, and as a general practice, the Company does not provide specific customer information to third parties without the customer’s consent. Since the queue positions contain specific customer information, the Company does not disclose this information.

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

SUNRISE ENERGY, LLC	:	
Complainant	:	
	:	
v.	:	Docket No. C-2025-3056807
	:	
FIRSTENERGY PENNSYLVANIA	:	
ELECTRIC COMPANY	:	
Respondent	:	

VERIFICATION

I, Neil Trout, 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 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.

September 24, 2025
Date

Neil Trout
Neil Trout