



341 White Pond Drive  
Akron, OH 44320

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

January 27, 2026

DATE OF DEPOSIT

**VIA UPS OVERNIGHT DELIVERY**

JAN 28 2026

Matthew Homsher, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street, 2<sup>nd</sup> Floor  
Harrisburg, PA 17120

PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

**Re: Sunrise Energy LLC v. FirstEnergy Pennsylvania Electric Company**  
**Docket No. C-2025-3056807**

Dear Secretary Homsher:

Enclosed please find the Answer of FirstEnergy Pennsylvania Electric Company to the Motion for Sanctions of Sunrise Energy LLC. This document has been served on the Complainant as shown in the Certificate of Service.

Please contact me if you have any questions regarding this matter.

Very truly yours,

Timothy K. McHugh

Krak

Enclosures

c: As Per Certificate of Service

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**DATE OF DEPOSIT**

**JAN 28 2026**

Sunrise Energy, LLC,

Complainant,

v.

FirstEnergy Pennsylvania Electric Company,

Respondent,

:  
:  
:  
:  
:  
:  
:

PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

Docket No. C-2025-3056807

---

**ANSWER OF FIRSTENERGY PENNSYLVANIA ELECTRIC COMPANY  
TO THE MOTION FOR SANCTIONS REQUIRING RESPONSES TO DISCOVERY  
OF SUNRISE ENERGY, LLC**

---

**TO THE CHIEF ADMINISTRATIVE LAW JUDGE CHARLES E. RAINEY, JR.<sup>1</sup>:**

FirstEnergy Pennsylvania Electric Company (“FE PA” or the “Company”) hereby files this Answer, pursuant to 52 Pa. Code §§ 5.342 and 5.371, to the “Motion for Sanctions Requiring Appropriate Responses to Interrogatories and Requests for Production of Documents” (“Motion”) filed by Sunrise Energy, LLC (“Sunrise” or “Complainant”) on January 22, 2025. Through its Motion, Sunrise seeks to compel responses by FE PA to Interrogatories and Requests for Production of Documents Set I, Nos. 6 and 7, and Set II, Nos. 1-12, 15-17, and 20-22 (the “Subject Discovery Requests”). Although styled as a “Motion for Sanctions,” the Motion fails to set forth any ground sufficient to justify sanctions, let alone to compel FE PA’s responses to the Subject Discovery Requests. Rather, at most, Sunrise has demonstrated that the information it seeks justifies the need for the issuance of a Protective Order by an Administrative Law Judge, once one

---

<sup>1</sup> Pursuant to 52 Pa. Code § 5.331(c), “[u]nless a presiding officer has been designated, objections and motions to compel shall be ruled upon by the Chief Administrative Law Judge.” As of the time of this Answer, no Administrative Law Judge has been assigned to this matter.

is assigned to this proceeding. To that end, and to the extent that it is determined that the information sought must be disclosed, a form of proposed Protective Order is attached as **Appendix A**, to this Answer, which FE PA submits (a) will resolve Sunrise's concerns, and (b) is substantially consistent with the form of Protective Order's regularly adopted by the Pennsylvania Public Utility Commission (the "Commission") in order to protect the highly sensitive information sought.

In support thereof, FE PA states as follows:

**I. INTRODUCTION**

1. On or about August 11, 2025, Sunrise filed a Formal Complaint at the above-captioned docket.
2. On or about September 2, 2025, FE PA answered the Formal Complaint.
3. On or about September 3, 2025, Sunrise propounded Set I Interrogatories ("Set I Discovery") on FE PA. A copy of the Set I Discovery is attached hereto as **Appendix B**.
4. On or about September 4, 2025, Sunrise propounded Set II Interrogatories ("Set II Discovery") on FE PA. A copy of the Set II Discovery is attached hereto as **Appendix C**.
5. On or about September 23, 2025, FE PA responded to Set I Discovery. FE PA's responses to Set I Discovery Nos. 6 and 7 contained the following paragraph:

*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.

A copy of FE PA's responses to the Subject Discovery Requests in the Set I Discovery is attached hereto as **Appendix D**.

6. On or about September 24, 2025, FE PA responded to Set II Discovery. FE PA's responses to Set II Discovery Nos. Nos. 1-12, 15-17, and 20-22 contained the same paragraph set forth in Paragraph 5 of this Answer above. A copy of FE PA's responses to the Subject Discovery in the Set II Discovery is attached hereto as **Appendix E**.

7. After FE PA provided its responses to the Subject Discovery Requests, the parties engaged in settlement discussions in an attempt to resolve this matter. These settlement discussions occurred over several months. However, the parties were unable to achieve a settlement.

8. On October 4, 2025, the Commission updated the docket in this matter to indicate "Case Closed – No active tasks for this Case."

9. Since FE PA filed its responses to the Subject Discovery Requests in September 2025, at no point prior to the filing of its Motion has Sunrise attempted to meet and confer regarding these responses. Similarly, at no point prior to the filing of its Motion has Sunrise claimed that FE PA's responses were deficient, or otherwise sought to discuss such deficiency with FE PA. And, at no time prior to the filing of the instant Motion has Sunrise conferred with FE PA about or attempted to seek a Protective Order that would resolve the concerns identified in the responses by FE PA.

10. On January 22, 2026, Sunrise filed the instant Motion.

11. On January 26, 2026, counsel for FE PA reached out to counsel for Sunrise regarding resolution of the Motion and the issuance of a Protective Order.

## II. ANSWER TO THE MOTION

12. Sunrise's Motion should be denied. In its Motion, Sunrise acknowledges that the Company's responses to the Subject Discovery Requests were "akin to an objection." Sunrise failed to seek a Motion to Compel,<sup>2</sup> which would have requested that the presiding officer compel that the Subject Discovery Requests be answered.

13. Furthermore, Sunrise's Motion should be denied. It sets forth no reasonable or rational basis for the disclosure of highly-sensitive information that, in the wrong hands, could subject FE PA's facilities and service to substantial and unnecessary risks.

14. As an initial matter, Sunrise's claim that it requires the granular information sought by the Subject Discovery Requests in order to review feasibility studies performed by FE PA is incorrect.<sup>3</sup> Sunrise was afforded the feasibility studies themselves, which set forth the analysis performed and conclusions reached by FE PA. The Subject Discovery Requests do not actually seek information related to the analysis performed or conclusions reached; instead, they seek detailed, facility and equipment specific information that is not publicly available and is subject to specific protections under both state and federal law. Contrary to its claims, Sunrise is not entitled to this information, and FE PA is required to protect this information from unauthorized disclosure.

15. Moreover, Sunrise does not actually justify why it needs the specific information sought by any of the Subject Discovery Requests. The Motion merely contains generic and general claims regarding the relevance of this information.<sup>4</sup> Such general claims are not sufficient to justify

---

<sup>2</sup> 52 Pa. Code § 5.342.

<sup>3</sup> Motion ¶ 6.

<sup>4</sup> See, e.g.,

the disclosure of the highly-sensitive information sought by Sunrise. Sunrise has similarly not identified the specific individuals that it proposes to have access to this information, or otherwise shown that they may appropriate be afforded such access under a protective order. For these reasons alone, the Motion should be denied.

16. In the alternative, to the extent that it is determined that the information sought must be disclosed, FE PA submits that a Protective Order must be entered prior to any of the information sought can or should be disclosed. FE PA emphasizes that the information sought should not, and cannot, be disclosed absent the issuance of a Protective Order. Indeed, the Subject Discovery Requests seeks highly sensitive information, including, among other things, (a) the models utilized by FE PA to perform impact studies related to interconnection and net-metering requests, (b) information related to the impacts of new interconnection and net-metering requests upon the distribution and transmission grid, (c) detailed information regarding FE PA facilities as well as their physical locations, interconnectivity with other aspects of the distribution and transmission system, and facility specific settings and specifications, and (d) cyber system information utilized by an electric utility to monitor and maintain system safety and reliability. This information is subject to protection under: (1) Public Utility Confidential Security Information Disclosure Protection Act (35 P. S. §§ 2141.1—2141.6) and the Commission’s regulations adopted thereunder at 52 Pa. Code Ch. 102; and (2) Bulk Electric System Cyber System Information (“BCSI”) under North American Electric Reliability Corporation (“NERC”) CIP-011-3 and/or Critical Energy Infrastructure Information under 18 C.F.R. § 388.112. And, contrary to Sunrise’s claims,<sup>5</sup> the

---

<sup>5</sup> Motion ¶ 9.

obligations imposed by NERC CIP-011-3 and 18 C.F.R. § 388.112 apply to FE PA regardless of the forum in which this information is sought.<sup>6</sup>

17. The Motion advances two arguments to justify the relief it seeks, none of which warrant the unprotected and unrestricted disclosure of the highly sensitive information that is targeted by the Subject Discovery Requests.

18. First, Sunrise argues that FE PA should have sought, and was required to seek, a Protective Order under 52 Pa. Code § 102.4(h).<sup>7</sup> Attached to this Answer as **Appendix A** is a Proposed Protective Order which FE PA submits appropriately protects the information sought by the Subject Discovery Requests, while allowing for Sunrise to review such information in a manner consistent with established practice before this Commission.

19. Where the information sought in an adversarial proceeding is either Confidential Security Information or “CSI,” and/or 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, the Commission has routinely granted Protective Orders that appropriately limit the disclosure of this information to specific persons under specific circumstances.<sup>8</sup> Thus, Sunrise’s claim that the federal designations applicable to the information sought are not relevant is incorrect and should be rejected.

---

<sup>6</sup> Sunrise identifies no such language in either the NERC CIP or CFR to support its contention that these designations only apply before NERC/FERC, because there is no such limitation.

<sup>7</sup> Motion ¶ 7. FE PA notes that at no point prior to the Motion did Sunrise raise this issue. Indeed, it was not until three months after FE PA responded to the Subject Discovery Requests (which is also more than two months after the Commission marked this docket closed) that Sunrise took any action with respect to the Subject Discovery Requests.

<sup>8</sup> See, e.g., *Application of Duquesne Light Company filed Pursuant to 52 Pa. Code Chapter 57, Subchapter G, for Approval of the Siting and Construction of the 138 kV Transmission Lines Associated with the Brunot Island - Crescent Project in the City of Pittsburgh, McKees Rocks Borough, Kennedy Township, Robinson Township, Moon Township, and Crescent Township, Allegheny County, Pennsylvania*, Docket No. A-2019-3008589 (Protective Order entered November 13, 2020). Other types of information subject to specific protections under federal law are similarly, and regularly, protected from disclosure by protective orders issued by this Commission. See *Monroe Energy LLC v. Laurel Pipe Line Company, L.P.*, Docket No. C-2025-3053018 (Protective Order entered May 28, 2025).

20. Thus, to the extent that it is determined FE PA should be required to disclose this information, FE PA submits that issuance of a Protective Order is necessary and reasonable. Moreover, to the extent that it is determined that FE PA should be required to disclose this information and a Protective Order is warranted, FE PA further submits that approval of a Protective Order consistent in form with **Appendix A** moots Sunrise's Motion and the relief it seeks should be denied.

21. Second, Sunrise argues the FE PA is attempting to "mask any review or exploration of its conclusions" contained in certain feasibility studies.<sup>9</sup> Importantly, at the time Sunrise issued its discovery, no Protective Order was in place. As explained above, Sunrise has not justified or otherwise demonstrated why the highly-sensitive information sought by each of the Subject Discovery Requests should be disclosed. Nonetheless, if it is determined that FE PA must disclose this information, FE PA will provide appropriate access to this information, subject to the provisions of an appropriate Protective Order consistent in form with the proposed Protective Order attached as **Appendix A**.

22. For all of the foregoing reasons, the Motion should be denied.

### **III. CONCLUSION**

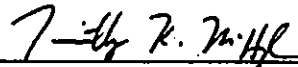
WHEREFORE, FirstEnergy Pennsylvania Electric Company respectfully requests that the Chief Administrative Law Judge Charles E. Rainey, Jr., or an assigned Administrative Law Judge,

---

<sup>9</sup> Motion ¶ 6.

deny the “Motion for Sanctions Requiring Appropriate Responses to Interrogatories and Requests for Production of Documents” filed by Sunrise Energy, LLC, in its entirety.

Respectfully submitted,



---

Timothy K. McHugh, Esquire (PA ID #317906)  
FirstEnergy Service Company  
341 White Pond Drive  
Akron, OH 44320  
Phone: (610) 301-9072  
E-mail: tmchugh@firstenergycorp.com

Date: January 27, 2026

*Counsel for FirstEnergy Pennsylvania Electric  
Company*

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Sunrise Energy, LLC,  
Complainant,

:  
:

Docket No. C-2025-3056807

v.

:  
:

**DATE OF DEPOSIT**

FirstEnergy Pennsylvania Electric Company,  
Respondent.

:

**JAN 28 2026**

**PROTECTIVE ORDER**

**PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU**

Upon consideration of the Motion for a Protective Order that was filed by FirstEnergy Pennsylvania Electric Company ("FE PA" or the "Company") on \_\_\_\_\_:

**IT IS ORDERED THAT:**

1. The Motion is hereby granted with respect to all materials and information identified in Paragraphs 2 – 3 below.

2. The information subject to this Protective Order is all correspondence, documents, data, information, studies, methodologies and other materials, furnished in this proceeding, that are believed by the producing party to be of a proprietary or confidential nature and that are so designated by being marked "CONFIDENTIAL," "HIGHLY CONFIDENTIAL," "CONFIDENTIAL SECURITY INFORMATION," "CRITICAL ENERGY INFRASTRUCTURE INFORMATION," or "BULK ELECTRIC SYSTEM CYBER SYSTEM INFORMATION." Such materials will be collectively referred to below as "Proprietary Information." When a statement or exhibit is identified for the record, the portions thereof that constitute Proprietary Information shall be designated as such for the record.

3. The parties may designate as "CONFIDENTIAL" those materials which customarily are treated by that party as sensitive or proprietary, which are not available to the

public, and which, if disclosed freely, would subject that party or its clients to risk of competitive disadvantage or other business injury. The parties may designate as “HIGHLY CONFIDENTIAL” those materials that are of such a commercially sensitive nature among the parties or of such a private, personal nature that the producing party is able to justify a heightened level of confidential protection with respect to those materials. The parties shall endeavor to limit their designation of information and materials as “HIGHLY CONFIDENTIAL.” The parties agree that materials containing specific, individual customer information shall be identified as “HIGHLY CONFIDENTIAL” and that access to these materials may be further restricted by the producing party. The parties may designate as “CONFIDENTIAL SECURITY INFORMATION” those materials, as defined in Section 2 of Act 156 of 2006, P.L. 1425, No. 156, 35 P.S. § 2141.2 *et seq.* “The Public Utility Confidential Security Information Disclosure Protection Act,” “the disclosure of which creates a reasonable likelihood of endangering the physical security of public utility resources, infrastructure, facility, or information storage system; and information regarding computer hardware, software, and networks, including administrative and technical records, which, if disclosed, would be reasonably likely to jeopardize computer security. If the material contains “CONFIDENTIAL SECURITY INFORMATION,” the parties producing such information shall mark on each page containing information the words “HIGHLY CONFIDENTIAL – CSI – CONTAINS CONFIDENTIAL SECURITY INFORMATION – DO NOT RELEASE.” The parties may designate materials containing critical energy infrastructure information (“CEII”), as defined in 18 C.F.R. § 388.113(c)(1),<sup>1</sup> as “CRITICAL ENERGY

---

<sup>1</sup> 18 C.F.R. § 388.113(c)(2) defines “Critical Energy Infrastructure Information” as “specific engineering, vulnerability, or detailed design information about proposed or existing critical infrastructure that: (i) Relates details about the production, generation, transportation, transmission, or distribution of energy; (ii) Could be useful to a person in planning an attack on critical infrastructure; (iii) Is exempt from mandatory disclosure under the Freedom of Information Act, 5 U.S.C. § 552; and (iv) Does not simply give the general location of the critical infrastructure.” Moreover, 18 C.F.R. § 388.113(c)(4) defines “Critical Infrastructure” as “existing and proposed systems and assets,

INFRASTRUCTURE INFORMATION.” If the material contains CEII, the parties producing such information shall mark on each page containing information the words “HIGHLY CONFIDENTIAL – CEII – CONTAINS CRITICAL ENERGY INFRASTRUCTURE INFORMATION – DO NOT RELEASE.” The parties may designate materials containing Bulk Electric System Cyber System Information (“BCSI”), in North American Electric Reliability Corporation (“NERC”) Critical Infrastructure Protection (“CIP”) Standard CIP-011-3,<sup>2</sup> as “BULK ELECTRIC SYSTEM CYBER SYSTEM INFORMATION.” If the material contains BCSI, the parties producing such information shall mark on each page containing information the words “HIGHLY CONFIDENTIAL – BCSI – CONTAINS BULK ELECTRIC SYSTEM CYBER SYSTEM INFORMATION – DO NOT RELEASE.”

4. Proprietary Information shall be made available to counsel for a party, subject to the terms of this Protective Order. Such counsel shall use or disclose the Proprietary Information only for purposes of preparing or presenting evidence, cross examination, argument, or settlement in this proceeding. To the extent required for participation in this proceeding, counsel for a party may afford access to Proprietary Information subject to the conditions set forth in this Protective Order.

5. Information and materials deemed as “CONFIDENTIAL” shall be made available to a “Reviewing Representative” who is a person that has signed a Non-Disclosure Certificate attached as Appendix A or Appendix B, and who is:

- (a) An attorney who has entered an appearance in this proceeding for a party or a statutory advocate pursuant to 52 Pa. Code § 1.8, if not an attorney;
- (b) Attorneys, paralegals, and other employees associated for purposes of this case with an attorney described in subparagraph 5(a);

---

whether physical or virtual, the incapacity or destruction of which would negatively affect security, economic security, public health or safety, or any combination of those matters.”

<sup>2</sup> <https://www.nerc.com/globalassets/standards/reliability-standards/cip/cip-011-3.pdf>.

- (c) An expert or an employee of an expert retained by a party for the purpose of advising, preparing for or testifying in this proceeding; or
- (d) Employees or other representatives of a party appearing in this proceeding with significant responsibility for this docket.

6. Information and materials deemed as “HIGHLY CONFIDENTIAL” may be provided to a “Reviewing Representative” who has signed a Non-Disclosure Certificate attached as Appendix B and who is:

- (a) An attorney who has entered an appearance in this proceeding for a party or a statutory advocate pursuant to 52 Pa. Code § 1.8, if not an attorney;
- (b) An attorney, paralegal, or other employee associated for purposes of this case with an attorney described in subparagraph 6(a);
- (c) An outside expert or an employee of an outside expert retained by a party for the purposes of advising, preparing for or testifying in this proceeding; or
- (d) A person designated as a Reviewing Representative for purposes of HIGHLY CONFIDENTIAL information and materials.

Provided that in accordance with the provisions of Sections 5.362 and 5.365(e) of the Commission’s Rules of Practice and Procedure, 52 Pa. Code §§ 5.362, 5.365(e), any party may, by subsequent objection or motion, seek further protection with respect to HIGHLY CONFIDENTIAL information and materials, including, but not limited to, total prohibition of disclosure or limitation of disclosure only to particular parties.

7. Information and materials deemed as “CONFIDENTIAL SECURITY INFORMATION” may be provided to a “Reviewing Representative” who has signed a Non-Disclosure Certificate attached as Appendix B and who is:

- (a) An outside attorney who has entered an appearance in this proceeding for a party;

- (b) An attorney, paralegal, or other employee associated for purposes of this case with an attorney described in subparagraph 7(a); or
- (c) An outside expert or an employee of an outside expert retained by an attorney described in subparagraph 7(a) for the purposes of advising, preparing for or testifying in this proceeding.

“CONFIDENTIAL SECURITY INFORMATION” will only be provided for inspection via in-person review at the offices of FirstEnergy Pennsylvania Electric Company, 2800 Pottsville Pike, Reading, Pennsylvania 19605, or upon request of an attorney described in subparagraph 7(a), between the hours of 9 A.M. to 5 P.M., Monday through Friday. Such a review may be proctored, and the Reviewing Representatives are prohibited from reproducing such information in any form without the prior authorization of the Company’s counsel (including taking detailed notes, making photocopies, or taking pictures). If a party determines that it is necessary to use “CONFIDENTIAL SECURITY INFORMATION” as part of their presentation of evidence in this proceeding, such party shall request a copy from counsel for the Company, which permission shall not be unreasonably withheld and subject to that party confirming it understands and will abide by the terms of this Protective Order concerning use of such materials.

Provided that in accordance with the provisions of Sections 5.362 and 5.365(e) of the Commission’s Rules of Practice and Procedure, 52 Pa. Code §§ 5.362, 5.365(e), any party may, by subsequent objection or motion, seek further protection with respect to “CONFIDENTIAL SECURITY INFORMATION,” including, but not limited to, total prohibition of disclosure or limitation of disclosure only to particular parties.

8. Information deemed as “CRITICAL ENERGY INFRASTRUCTURE INFORMATION” may be made available for inspection and review by a “Reviewing Representative” who has signed a Non-Disclosure Certificate attached as Appendix B and who is:

- (a) An outside attorney who has entered an appearance in this proceeding for a party;
- (b) An attorney, paralegal, or other employee associated for purposes of this case with an attorney described in subparagraph 8(a); or
- (c) An outside expert or an employee of an outside expert retained by an attorney described in subparagraph 8(a) for the purposes of advising, preparing for or testifying in this proceeding.

“CRITICAL ENERGY INFRASTRUCTURE INFORMATION” will only be provided for inspection via in-person review at the offices of FirstEnergy Pennsylvania Electric Company, 2800 Pottsville Pike, Reading, Pennsylvania 19605, or upon request of an attorney described in subparagraph 8(a), between the hours of 9 A.M. to 5 P.M., Monday through Friday. Such a review may be proctored, and the Reviewing Representatives are prohibited from reproducing such information in any form without the prior authorization of the Company’s counsel (including taking detailed notes, making photocopies, or taking pictures). If a party determines that it is necessary to use “CRITICAL ENERGY INFRASTRUCTURE INFORMATION” as part of their presentation of evidence in this proceeding, such party shall request a copy from counsel for the Company, which permission shall not be unreasonably withheld and subject to that party confirming it understands and will abide by the terms of this Protective Order concerning use of such materials.

Reviewing Representatives who gain access to “CRITICAL ENERGY INFRASTRUCTURE INFORMATION” undertake the obligation to protect the confidentiality of CEII and undertake all other obligations resulting from having access to this confidential information, in accordance with 18 C.F.R. 388.113(h), as well as all other applicable federal and state laws and other legal rules, which are incorporated by reference herein. Any copies of CEII shall also be deemed to be “CRITICAL ENERGY INFRASTRUCTURE INFORMATION.”

Provided, further, that in accordance with the provisions of Sections 5.362 and 5.365(e) of the Commission's Rules of Practice and Procedure, 52 Pa. Code §§ 5.362, 5.365(e), any party may, by subsequent objection or motion, seek further protection with respect to "CRITICAL ENERGY INFRASTRUCTURE INFORMATION," including, but not limited to, total prohibition of disclosure or limitation of disclosure only to particular parties.

9. Information deemed as "BULK ELECTRIC SYSTEM CYBER SYSTEM INFORMATION" may be made available for inspection and review by a "Reviewing Representative" who has signed a Non-Disclosure Certificate attached as Appendix B and who is:

- (a) An outside attorney who has entered an appearance in this proceeding for a party;
- (b) An attorney, paralegal, or other employee associated for purposes of this case with an attorney described in subparagraph 9(a); or
- (c) An outside expert or an employee of an outside expert retained by an attorney described in subparagraph 9(a) for the purposes of advising, preparing for or testifying in this proceeding.

"BULK ELECTRIC SYSTEM CYBER SYSTEM INFORMATION" will only be provided for inspection via in-person review at the offices of FirstEnergy Pennsylvania Electric Company, 2800 Pottsville Pike, Reading, Pennsylvania 19605, or upon request of an attorney described in subparagraph 9(a), between the hours of 9 A.M. to 5 P.M., Monday through Friday. Such a review may be proctored, and the Reviewing Representatives are prohibited from reproducing such information in any form without the prior authorization of the Company's counsel (including taking detailed notes, making photocopies, or taking pictures). If a party determines that it is necessary to use "BULK ELECTRIC SYSTEM CYBER SYSTEM INFORMATION" as part of their presentation of evidence in this proceeding, such party shall request a copy from counsel for the Company, which permission shall not be unreasonably withheld and subject to that party

confirming it understands and will abide by the terms of this Protective Order concerning use of such materials.

Reviewing Representatives who gain access to “BULK ELECTRIC SYSTEM CYBER SYSTEM INFORMATION” undertake the obligation to protect the confidentiality of BCSI and undertake all other obligations resulting from having access to this confidential information, in accordance with NERC CIP-011-3, as well as all other applicable federal and state laws and other legal rules, which are incorporated by reference herein. Any copies of BCSI shall also be deemed to be “BULK ELECTRIC SYSTEM CYBER SYSTEM INFORMATION.”

10. For purposes of this Protective Order, a Reviewing Representative may not be a “Restricted Person.”

(a) A “Restricted Person” shall mean: (i) an officer, director, stockholder, partner, or owner of any competitor of the parties or an employee of such an entity if the employee’s duties involve marketing or pricing of the competitor’s products or services; (ii) an officer, director, stockholder, partner, or owner of any affiliate of a competitor of the parties (including any association of competitors of the parties) or an employee of such an entity if the employee’s duties involve marketing or pricing of the competitor’s products or services; (iii) an officer, director, stockholder, owner, or employee of a competitor of a customer of the parties if the Proprietary Information concerns a specific, identifiable customer of the parties; or (iv) an officer, director, stockholder, owner, or employee of an affiliate of a competitor of a customer of the parties if the Proprietary Information concerns a specific, identifiable customer of the parties; provided, however, that no expert shall be disqualified on account of being a stockholder, partner, or owner unless

that expert's interest in the business would provide a significant motive for violation of the limitations of permissible use of the Proprietary Information. For purposes of this Protective Order, stocks, partnership or other ownership interests valued at more than \$10,000 or constituting more than a 1% interest in a business establish a significant motive for violation.

(b) If an expert for a party, another member of the expert's firm or the expert's firm generally also serves as an expert for, or as a consultant or advisor to, a Restricted Person, said expert must: (i) identify for the parties each Restricted Person and each expert or consultant; (ii) make reasonable attempts to segregate those personnel assisting in the expert's participation in this proceeding from those personnel working on behalf of a Restricted Person; and (iii) if segregation of such personnel is impractical, the expert shall give to the producing party written assurances that the lack of segregation will in no way jeopardize the interests of the parties or their customers. The parties retain the right to challenge the adequacy of the written assurances that the parties' or their customers' interests will not be jeopardized. No other persons may have access to the Proprietary Information except as authorized by order of the Commission.

11. In the event that a party wishes to designate as a Reviewing Representative a person not described in Paragraphs 5(a)-(d), 6(a)-(d), 7(a)-(c), 8(a)-(c), or 9 (a)-(c) above, or a person that is a Restricted Person under Paragraph 10, the party shall seek agreement from the party providing the Proprietary Information. If an agreement is reached, that person shall be a Reviewing Representative with respect to that information and those materials. If no agreement is reached,

the party shall submit the disputed designation to the presiding Administrative Law Judge(s) for resolution.

12. A qualified "Reviewing Representative" for "HIGHLY CONFIDENTIAL" information and materials may review and discuss "HIGHLY CONFIDENTIAL" information and materials with their client or with the entity with which they are employed or associated, to the extent that the client or entity is not a "Restricted Person," but may not share with or permit the client or entity to review the "HIGHLY CONFIDENTIAL" information and materials. Such discussions must be general in nature and not disclose specific "HIGHLY CONFIDENTIAL" information and materials.

13. Information deemed Proprietary Information shall not be used except as necessary for the conduct of this proceeding, nor shall it be disclosed in any manner to any person except a Reviewing Representative who is engaged in the conduct of this proceeding and who needs to know the information in order to carry out that person's responsibilities in this proceeding. Reviewing Representatives may not use information contained in any Proprietary Information obtained through this proceeding to give any party or any competitor of any party a commercial advantage.

14. Reviewing Representatives shall execute a Non-Disclosure Certificate in order to obtain access to Proprietary Information and will be subject to the following conditions:

- (a) A Reviewing Representative shall not be permitted to inspect, participate in discussions regarding, or otherwise be permitted access to Proprietary Information pursuant to this Protective Order unless that Reviewing Representative has first executed a Non-Disclosure Certificate, provided that if an attorney qualified as a Reviewing Representative has executed such a certificate, the paralegals,

secretarial personnel, and clerical personnel under the attorney's instruction, supervision or control need not do so. A copy of each Non-Disclosure Certificate shall be provided to counsel for the Parties asserting confidentiality prior to disclosure of any Proprietary Information to that Reviewing Representative.

(b) Attorneys and outside experts qualified as Reviewing Representatives are responsible for ensuring that persons under their supervision or control comply with the Protective Order.

15. None of the parties waive their right to pursue any other legal or equitable remedies that may be available in the event of actual or anticipated disclosure of Proprietary Information.

16. The Parties shall designate data or documents as constituting or containing Proprietary Information by marking the documents "CONFIDENTIAL," "HIGHLY CONFIDENTIAL," "HIGHLY CONFIDENTIAL – CSI – CONTAINS CONFIDENTIAL SECURITY INFORMATION – DO NOT RELEASE," "HIGHLY CONFIDENTIAL – CEII – CONTAINS CRITICAL ENERGY INFRASTRUCTURE INFORMATION – DO NOT RELEASE," or "HIGHLY CONFIDENTIAL – BCSI – CONTAINS CRITICAL ENERGY INFRASTRUCTURE INFORMATION – DO NOT RELEASE." Where only part of data compilations or multi-page documents constitutes or contains Proprietary Information, the parties, insofar as reasonably practicable within discovery and other time constraints imposed in this proceeding, shall designate only the specific data or pages of documents that constitute or contain Proprietary Information. The Proprietary Information shall be served upon the Parties hereto only, and the materials shall be separate from the nonproprietary materials and conspicuously marked "CONFIDENTIAL," "HIGHLY CONFIDENTIAL," "HIGHLY CONFIDENTIAL – CSI – CONTAINS CONFIDENTIAL SECURITY INFORMATION – DO NOT RELEASE,"

“HIGHLY CONFIDENTIAL – CEII – CONTAINS CRITICAL ENERGY INFRASTRUCTURE INFORMATION – DO NOT RELEASE,” or ““HIGHLY CONFIDENTIAL – BCSI – CONTAINS CRITICAL ENERGY INFRASTRUCTURE INFORMATION – DO NOT RELEASE.” For filing purposes, Proprietary Information shall be filed separately from the nonproprietary materials and conspicuously marked “CONFIDENTIAL,” “HIGHLY CONFIDENTIAL,” “HIGHLY CONFIDENTIAL – CSI – CONTAINS CONFIDENTIAL SECURITY INFORMATION – DO NOT RELEASE,” “HIGHLY CONFIDENTIAL – CEII – CONTAINS CRITICAL ENERGY INFRASTRUCTURE INFORMATION – DO NOT RELEASE,” or ““HIGHLY CONFIDENTIAL – BCSI – CONTAINS CRITICAL ENERGY INFRASTRUCTURE INFORMATION – DO NOT RELEASE.”

17. The parties will consider and treat the Proprietary Information as within the exemptions from disclosure provided in Section 335(d) of the Public Utility Code, 66 Pa.C.S. § 335(d), and the Pennsylvania Right-to-Know Law, 65 P.S. §§ 67.101 *et seq.*, until such time as the information is found to be non-proprietary. In the event that any person or entity seeks to compel the disclosure of Proprietary Information, the non-producing party shall promptly notify the producing party in order to provide the producing party an opportunity to oppose or limit such disclosure.

18. Any public reference to Proprietary Information by a party or its Reviewing Representatives shall be to the title or exhibit reference in sufficient detail to permit persons with access to the Proprietary Information to understand fully the reference and not more. The Proprietary Information shall remain a part of the record, to the extent admitted, for all purposes of administrative or judicial review.

19. Part of any record of this proceeding containing Proprietary Information, including, but not limited to, all exhibits, writings, testimony, cross-examination, arguments, and responses to discovery, and including reference thereto as mentioned in Paragraph 18 above, shall be sealed for all purposes, including administrative and judicial review, unless such Proprietary Information is released from the restrictions of this Protective Order, either through the agreement of the parties to this proceeding or pursuant to an order of the Commission.

20. The parties shall retain the right to question or challenge the confidential or proprietary nature of Proprietary Information and to question or challenge the admissibility of Proprietary Information. If a party challenges the designation of a document or information as proprietary, the party providing the information retains the burden of demonstrating that the designation is appropriate.

21. The parties shall retain the right to question or challenge the admissibility of Proprietary Information; to object to the production of Proprietary Information on any proper ground; and to refuse to produce Proprietary Information pending the adjudication of the objection.

22. Within 30 days after a Commission final order is entered in the above-captioned proceeding, or in the event of appeals, within 30 days after appeals are finally decided, the parties, upon request, shall either destroy or return to the parties all copies of all documents and other materials not entered into the record, including notes, which contain any Proprietary Information. In the event that a party elects to destroy all copies of documents and other materials containing Proprietary Information instead of returning the copies of documents and other materials

containing Proprietary Information to the parties, the party shall certify in writing to the producing party that the Proprietary Information has been destroyed.

Dated: \_\_\_\_\_

\_\_\_\_\_  
Charles E. Rainey  
Chief Administrative Law Judge

**APPENDIX A**

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

**NON-DISCLOSURE CERTIFICATE FOR  
CONFIDENTIAL INFORMATION AND MATERIALS**

TO WHOM IT MAY CONCERN:

The undersigned is the \_\_\_\_\_ of  
 \_\_\_\_\_ (the retaining party). The undersigned has  
 read and understands the Protective Order and the required treatment of Proprietary Information.  
 The undersigned agrees to be bound by and comply with the terms and conditions of said Protective  
 Order.

\_\_\_\_\_  
SIGNATURE

\_\_\_\_\_  
NAME (Printed)

\_\_\_\_\_  
ADDRESS

\_\_\_\_\_  
EMPLOYER

**APPENDIX B**

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

**NON-DISCLOSURE CERTIFICATE FOR  
HIGHLY CONFIDENTIAL INFORMATION, CONFIDENTIAL SECURITY  
INFORMATION, AND CRITICAL ENERGY INFRASTRUCTURE INFORMATION  
AND MATERIALS**

TO WHOM IT MAY CONCERN:

The undersigned is the \_\_\_\_\_ of \_\_\_\_\_ (the retaining party). The undersigned has read and understands the Protective Order and the required treatment of information and materials designated as “CONFIDENTIAL,” “HIGHLY CONFIDENTIAL,” “CONFIDENTIAL SECURITY INFORMATION,” or “HIGHLY CONFIDENTIAL – CEII – CONTAINS CRITICAL ENERGY INFRASTRUCTURE INFORMATION – DO NOT RELEASE” as defined in the Protective Order. The undersigned agrees to be bound by and comply with the terms and conditions of said Protective Order. The undersigned understands and agrees that, pursuant to Paragraphs 6, 7, 8, and 9, a party providing “HIGHLY CONFIDENTIAL” information and materials, “CONFIDENTIAL SECURITY INFORMATION,” “CRITICAL ENERGY INFRASTRUCTURE INFORMATION,” or “BULK ELECTRIC SYSTEM CYBER SYSTEM INFORMATION” may seek further protection, including, but not limited to, total prohibition of disclosure as to particular individuals, even where Appendix B has been executed.

\_\_\_\_\_  
SIGNATURE

\_\_\_\_\_  
NAME (Printed)

Appendix A

---

---

ADDRESS

---

EMPLOYER

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Sunrise Energy, LLC,  
Complainant,

v.

FirstEnergy Pennsylvania Electric Company,  
Respondent.

:  
:  
:  
:  
:  
:  
:

**DATE OF DEPOSIT**

Docket No. C-2025-3056807 JAN 28 2026

**PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU**

---

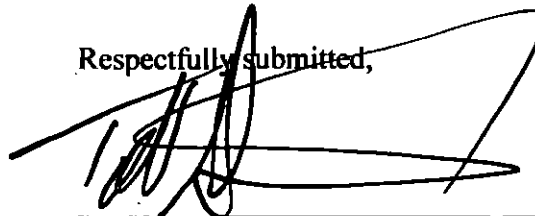
**SUNRISE ENERGY, LLC  
INTERROGATORIES AND REQUESTS FOR PRODUCTION  
OF DOCUMENTS, SET I, DIRECTED TO  
FIRSTENERGY PENNSYLVANIA ELECTRIC COMPANY**

---

TO: FirstEnergy Pennsylvania Electric Company

Sunrise Energy, LLC, by and through its counsel in this matter, HMS Legal LLP, and pursuant to the Pennsylvania Utility Commission's ("Commission") Regulations at 52 Pa. Code §§ 5.341 and 5.349 *et. seq.*, hereby propound the following Interrogatories and Requests for Production of Documents upon FirstEnergy Pennsylvania Electric Company ("FirstEnergy") and those individuals authorized to answer on FirstEnergy's behalf. Said answers are due within 20 days from the date of service.

Respectfully submitted,



---

Todd S. Stewart, Attorney ID No. 75556  
HMS Legal LLP  
501 Corporate Circle, Suite 302  
Harrisburg, PA 17110  
(717) 236-1300  
(717) 236-4841 (fax)  
[tsstewart@hmslegal.com](mailto:tsstewart@hmslegal.com)

*Counsel for Sunrise Energy, LLC*

DATED: September 3, 2025

**INSTRUCTIONS**

A. In answering these Interrogatories, please furnish all information available to you, including any such information in possession of your attorneys or anyone acting on your behalf, and not merely such information known of your own personal knowledge. If you cannot answer the Interrogatories in full after exercising due diligence to secure the information to do so, so state and answer to the extent possible.

B. If the answer to any of the Interrogatories is that you lack knowledge of some or all of the requested information, describe all efforts made by you to obtain the information necessary to answer that Interrogatory.

C. If any matter responsive to any of the Interrogatories is withheld based on any claim of privilege, describe generally the matter withheld, state the privilege being relied upon, and identify all persons or entities who have or have had access to said matters. If you refuse to describe and/or produce any document on the basis of a claim of privilege or protection from discovery of any kind, with respect to each such document, set forth the following information:

- (i) the date of the document;
- (ii) its authors;
- (iii) all recipients of the document;
- (iv) the present location and custodian of the document; and
- (v) the basis of the claim of privilege or protection from discovery.

In addition, if you refuse to produce information based on the grounds that such information is preliminary and/or still in draft form, set forth the following information:

- (vi) the date the information was first created or recorded;
- (vii) the last date on which the information was changed or altered in any manner; and

(viii) the expected date that the information will be finalized.

D. Each lettered sub-part of a numbered Interrogatory is to be considered a separate Interrogatory for the purpose of your answers and objections. You must object separately to each sub-part and must answer any other sub-parts.

E. These Interrogatories are to be deemed continuing in nature, and you shall promptly supply, by way of supplemental response, any additional responsive information that may become known to you or anyone acting on your behalf after your answers have been prepared or served.

F. For any and all responses that contain tables, charts or documents that originated in a form or using software other than the format or software in which it is presented in the response, provide an electronic copy of each such document in its native format.

G. For all documents produced, identify by Bates number (or other method of equal precision) which document or documents are responsive to each separate Interrogatory. If you respond by stating that the requested documents already have been produced in response to prior discovery requests, identify the responsive documents previously produced either by bates number or other method of equal precision that, at a minimum, identifies the author(s), recipients(s) and date of creation and provides a general description of the document.

**DEFINITIONS**

a. "You" or the name of the party to whom these interrogatories are directed refers to any agent, agency, representative or affiliate thereof.

b. "Company," or "Respondent" refer to FirstEnergy and any agent, agency, or affiliate thereof.

c. "Assumption" refers to any predictions, projections, assumptions, or other estimates.

d. "Proceeding" refers to the investigation of the Pennsylvania Public Utility Commission at the docket number set forth in the caption of these Interrogatories.

e. "Person" or "persons" means all individuals and entities, including natural persons, representative persons, public or private corporations, companies, unincorporated associations, partnerships, organizations, government entities or groups, plus any divisions, departments, or units thereof.

f. "Document" or "documents" means any written, printed, typed, recorded, or graphic matter, whether produced or reproduced or stored on paper, cards, tapes, film, electronic facsimile, computer storage devices or any other devices or media, including, but not limited to papers; books; letters; photographs; objects; tangible things; correspondence; telegrams; cables; telex messages; memoranda; notes; notations; records; work papers; transcripts; minutes; reports and recordings of telephone or other conversations, or of interviews, or of conferences, or of other meetings; affidavits; statements; opinions; proposals; reports; studies; analyses; audits; evaluations; contracts; agreements; journals; statistical records; ledgers; books of account; bookkeeping entries; financial statements; tax returns; vouchers; checks; check stubs; invoices; receipts; desk calendars; appointment books; diaries; lists; tabulations; summaries; sound recordings; computer printouts; data processing input and output; microfilms; all records kept by electronic, photographic, or mechanical means; and things similar to any of the foregoing, however denominated. When one or more of the foregoing documents is requested or referred to, the request or reference shall include, but is not limited to, the original and each and every copy and draft thereof having writings, notations, corrections, or markings unique to such copy or draft.

g. "Oral communication" means any and all non-written forms of expression or communication, whether face-to-face or by telephone, in a conference or otherwise.

- h. "Identify" or "identification", when used in reference to a document, means to:
1. state the type of document (e.g., letter, log, report, etc.);
  2. state its date;
  3. state its title, heading or other designation and any other information (e.g., index or file number) which would facilitate the identification thereof;

4. identify the person(s) who prepared and/or signed the document;
5. identify the persons (or if widely distributed, the organization or classes of persons) to whom it was sent;
6. identify the last known location of the document and of each copy thereof having notations or markings unique to such copy;
7. if the document was, but no longer is, in your possession or subject to your control, identify its last known custodian, describe the circumstances under which it passed from your control to that person, and identify each person having knowledge of such circumstances;
8. describe its general subject matter and contents; and
9. if the document exceeds one page in length, or is contained in a series of documents or a larger portion, identify the specific document by appropriately identifying name or symbol, the number of the particular page or pages (or other descriptive aid) and of the line or lines thereof upon which the information referred to in the Interrogatory or your response appears.

i. "Identify" or "identification", when used in reference to a natural person, means to provide the following information:

1. his or her full name;
2. his or her business affiliation(s), position(s), title(s), and job description(s) during the period delineated in the Interrogatory (and the dates during which each affiliation, position, title, and job description applied to him or her);
3. his or her present or last known business address (and the date of that last knowledge); and
4. his or her present or last known residence address (and the date of that last knowledge).

j. "Identify" or "identification", when used in reference to an oral communication or statement, means to:

1. state the date of the oral communication or statement;
2. state the place where it occurred;
3. identify the persons(s) making and listening to the oral communication or statement;

4. identify all other persons present at the time it was made;
5. if by telephone, identify the persons participating in the conversation and where each was located at the time of the call; and
6. describe the substance of the oral communication or statement.

k. "Date" means the exact day, month, and year if ascertainable, or, if not, the best approximation thereof or best approximation in relation to other events.

l. "Describe" means to set forth fully and clearly every relevant fact and/or event, including particulars of time, place and manner.

m. "Set forth the factual basis" for a particular assumption means: (a) describe in detail the facts underlying the assumption; (b) identify each and every document which constitutes, evidences, refers, or relates in any way to the assumption; (c) identify each and every person who knows or believes to have knowledge or information concerning the assumption; and (d) describe in detail the nature of each such person's knowledge or information.

n. Where the context so requires:

1. the terms "and" and "or" mean "and/or";
2. the plural of a word includes the singular, and the singular includes the plural;
3. the past tense of verb includes the present, and the present tense includes the past; and
4. the masculine gender includes feminine and neuter genders, and the neuter gender include the masculine and feminine.

o. "Projects" means the solar net metered projects listed in the formal complaint at this docket.

p. All other words are to be given their ordinary and usual meanings, according to a current edition of Webster's Dictionary.

**SUNRISE ENERGY, LLC  
INTERROGATORIES AND REQUESTS FOR PRODUCTION  
OF DOCUMENTS, SET I, DIRECTED TO  
FIRSTENERGY PENNSYLVANIA ELECTRIC COMPANY**

**DOCKET NO. C-2025-3056807**

---

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.
2. How many individuals are assigned to performing such studies for First Energy?
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?
4. How many man-hours did FEPA personnel spend on each study? Over what timespan?
5. Are studies reviewed by FEPA personnel after they are produced to ensure correctness and accuracy? If so, by whom?
6. Please provide all files necessary to replicate the study using the same or compatible software.
7. Please provide all grid parameters and assumptions employed while modeling the projects.
8. Specify all equipment/technology (e.g. bi-directional voltage regulators) that were considered when formulating FEPA's proposed mitigation strategy.
9. Are there any technologies (e.g. batteries) that were not considered in FEPA's mitigation strategy, and if not, why ?

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Sunrise Energy, LLC,	:	
Complainant,	:	DATE OF DEPOSIT
	:	
v.	:	Docket No. C-2025-3056807      JAN 28 2026
	:	
FirstEnergy Pennsylvania Electric Company,	:	PA PUBLIC UTILITY COMMISSION
Respondent.	:	SECRETARY'S BUREAU

---

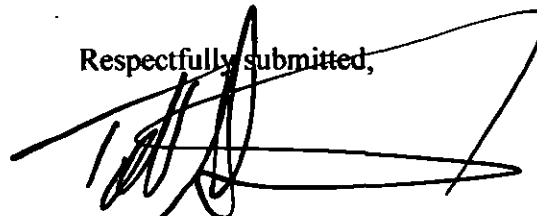
**SUNRISE ENERGY, LLC  
INTERROGATORIES AND REQUESTS FOR PRODUCTION  
OF DOCUMENTS, SET II, DIRECTED TO  
FIRSTENERGY PENNSYLVANIA ELECTRIC COMPANY**

---

TO: FirstEnergy Pennsylvania Electric Company

Sunrise Energy, LLC, by and through its counsel in this matter, HMS Legal LLP, and pursuant to the Pennsylvania Utility Commission's ("Commission") Regulations at 52 Pa. Code §§ 5.341 and 5.349 *et. seq.*, hereby propound the following Interrogatories and Requests for Production of Documents upon FirstEnergy Pennsylvania Electric Company ("FirstEnergy") and those individuals authorized to answer on FirstEnergy's behalf. Said answers are due within 20 days from the date of service.

Respectfully submitted,




---

Todd S. Stewart, Attorney ID No. 75556  
HMS Legal LLP  
501 Corporate Circle, Suite 302  
Harrisburg, PA 17110  
(717) 236-1300  
(717) 236-4841 (fax)  
[tsstewart@hmslegal.com](mailto:tsstewart@hmslegal.com)

*Counsel for Sunrise Energy, LLC*

DATED: September 4, 2025

**INSTRUCTIONS**

A. In answering these Interrogatories, please furnish all information available to you, including any such information in possession of your attorneys or anyone acting on your behalf, and not merely such information known of your own personal knowledge. If you cannot answer the Interrogatories in full after exercising due diligence to secure the information to do so, so state and answer to the extent possible.

B. If the answer to any of the Interrogatories is that you lack knowledge of some or all of the requested information, describe all efforts made by you to obtain the information necessary to answer that Interrogatory.

C. If any matter responsive to any of the Interrogatories is withheld based on any claim of privilege, describe generally the matter withheld, state the privilege being relied upon, and identify all persons or entities who have or have had access to said matters. If you refuse to describe and/or produce any document on the basis of a claim of privilege or protection from discovery of any kind, with respect to each such document, set forth the following information:

- (i) the date of the document;
- (ii) its authors;
- (iii) all recipients of the document;
- (iv) the present location and custodian of the document; and
- (v) the basis of the claim of privilege or protection from discovery.

In addition, if you refuse to produce information based on the grounds that such information is preliminary and/or still in draft form, set forth the following information:

- (vi) the date the information was first created or recorded;
- (vii) the last date on which the information was changed or altered in any manner; and

(viii) the expected date that the information will be finalized.

D. Each lettered sub-part of a numbered Interrogatory is to be considered a separate Interrogatory for the purpose of your answers and objections. You must object separately to each sub-part and must answer any other sub-parts.

E. These Interrogatories are to be deemed continuing in nature, and you shall promptly supply, by way of supplemental response, any additional responsive information that may become known to you or anyone acting on your behalf after your answers have been prepared or served.

F. For any and all responses that contain tables, charts or documents that originated in a form or using software other than the format or software in which it is presented in the response, provide an electronic copy of each such document in its native format.

G. For all documents produced, identify by Bates number (or other method of equal precision) which document or documents are responsive to each separate Interrogatory. If you respond by stating that the requested documents already have been produced in response to prior discovery requests, identify the responsive documents previously produced either by bates number or other method of equal precision that, at a minimum, identifies the author(s), recipients(s) and date of creation and provides a general description of the document.

**DEFINITIONS**

a. "You" or the name of the party to whom these interrogatories are directed refers to any agent, agency, representative or affiliate thereof.

b. "Company," or "Respondent" refer to FirstEnergy and any agent, agency, or affiliate thereof.

c. "Assumption" refers to any predictions, projections, assumptions, or other estimates.

d. "Proceeding" refers to the investigation of the Pennsylvania Public Utility Commission at the docket number set forth in the caption of these Interrogatories.

e. "Person" or "persons" means all individuals and entities, including natural persons, representative persons, public or private corporations, companies, unincorporated associations, partnerships, organizations, government entities or groups, plus any divisions, departments, or units thereof.

f. "Document" or "documents" means any written, printed, typed, recorded, or graphic matter, whether produced or reproduced or stored on paper, cards, tapes, film, electronic facsimile, computer storage devices or any other devices or media, including, but not limited to papers; books; letters; photographs; objects; tangible things; correspondence; telegrams; cables; telex messages; memoranda; notes; notations; records; work papers; transcripts; minutes; reports and recordings of telephone or other conversations, or of interviews, or of conferences, or of other meetings; affidavits; statements; opinions; proposals; reports; studies; analyses; audits; evaluations; contracts; agreements; journals; statistical records; ledgers; books of account; bookkeeping entries; financial statements; tax returns; vouchers; checks; check stubs; invoices; receipts; desk calendars; appointment books; diaries; lists; tabulations; summaries; sound recordings; computer printouts; data processing input and output; microfilms; all records kept by electronic, photographic, or mechanical means; and things similar to any of the foregoing, however denominated. When one or more of the foregoing documents is requested or referred to, the request or reference shall include, but is not limited to, the original and each and every copy and draft thereof having writings, notations, corrections, or markings unique to such copy or draft.

g. "Oral communication" means any and all non-written forms of expression or communication, whether face-to-face or by telephone, in a conference or otherwise.

h. "Identify" or "identification", when used in reference to a document, means to:

1. state the type of document (e.g., letter, log, report, etc.);
2. state its date;
3. state its title, heading or other designation and any other information (e.g., index or file number) which would facilitate the identification thereof;

4. identify the person(s) who prepared and/or signed the document;
5. identify the persons (or if widely distributed, the organization or classes of persons) to whom it was sent;
6. identify the last known location of the document and of each copy thereof having notations or markings unique to such copy;
7. if the document was, but no longer is, in your possession or subject to your control, identify its last known custodian, describe the circumstances under which it passed from your control to that person, and identify each person having knowledge of such circumstances;
8. describe its general subject matter and contents; and
9. if the document exceeds one page in length, or is contained in a series of documents or a larger portion, identify the specific document by appropriately identifying name or symbol, the number of the particular page or pages (or other descriptive aid) and of the line or lines thereof upon which the information referred to in the Interrogatory or your response appears.
  - i. "Identify" or "identification", when used in reference to a natural person, means to provide the following information:
    1. his or her full name;
    2. his or her business affiliation(s), position(s), title(s), and job description(s) during the period delineated in the Interrogatory (and the dates during which each affiliation, position, title, and job description applied to him or her);
    3. his or her present or last known business address (and the date of that last knowledge); and
    4. his or her present or last known residence address (and the date of that last knowledge).
  - j. "Identify" or "identification", when used in reference to an oral communication or statement, means to:
    1. state the date of the oral communication or statement;
    2. state the place where it occurred;
    3. identify the persons(s) making and listening to the oral communication or statement;

## Appendix C

4. identify all other persons present at the time it was made;
  5. if by telephone, identify the persons participating in the conversation and where each was located at the time of the call; and
  6. describe the substance of the oral communication or statement.
- k. "Date" means the exact day, month, and year if ascertainable, or, if not, the best approximation thereof or best approximation in relation to other events.
- l. "Describe" means to set forth fully and clearly every relevant fact and/or event, including particulars of time, place and manner.
- m. "Set forth the factual basis" for a particular assumption means: (a) describe in detail the facts underlying the assumption; (b) identify each and every document which constitutes, evidences, refers, or relates in any way to the assumption; (c) identify each and every person who knows or believes to have knowledge or information concerning the assumption; and (d) describe in detail the nature of each such person's knowledge or information.
- n. Where the context so requires:
1. the terms "and" and "or" mean "and/or";
  2. the plural of a word includes the singular, and the singular includes the plural;
  3. the past tense of verb includes the present, and the present tense includes the past; and
  4. the masculine gender includes feminine and neuter genders, and the neuter gender include the masculine and feminine.
- o. "Projects" means the solar net metered projects listed in the formal complaint at this docket.
- p. All other words are to be given their ordinary and usual meanings, according to a current edition of Webster's Dictionary.

**SUNRISE ENERGY, LLC  
INTERROGATORIES AND REQUESTS FOR PRODUCTION  
OF DOCUMENTS, SET II, DIRECTED TO  
FIRSTENERGY PENNSYLVANIA ELECTRIC COMPANY**

**DOCKET NO. C-2025-3056807**

---

**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**

1. Provide Substation transformer model number and serial number.
2. Provide Substation transformer settings.
3. Provide the tap setting ranges for the substation transformer.
4. Provide Substation voltage regulator model number and serial number.
5. Provide Voltage regulator settings.
6. Provide the setting ranges of the voltage regulator.
7. 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
8. Provide recloser model number serial number and settings on the circuit.
9. Provide capacitor bank model number, serial number and settings on the circuit.
10. Provide voltage regulators and Beckwith Controllers model number, serial number and settings on the circuit.
11. Provide switching model number, serial number and settings.
12. Provide annual load profile for this circuit.
13. Provide policy on project queue position.

**SUNRISE ENERGY, LLC**  
**INTERROGATORIES AND REQUESTS FOR PRODUCTION**  
**OF DOCUMENTS, SET II, DIRECTED TO**  
**FIRSTENERGY PENNSYLVANIA ELECTRIC COMPANY**

Appendix C

**DOCKET NO. C-2025-3056807**

---

14. How does FirstEnergy monitor this circuit for voltage rise and how does FE remedy these issues?
15. Provide assumptions used when developing the impact study.
16. Provide complete CYME analysis.
17. Provide calculations that show the feeder voltage anywhere on the circuit exceeding 1.05 pu.
18. Provide explanation why Primary Voltage Deviation is analyzed with Cap and taps locked.
19. 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.
20. 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.
21. Please provide any regulatory or statutory authorizations that affirm FEPA's right to keep AEPS Act queue positions confidential.
22. Please provide any documentation from Plaintiff where confidentiality was requested with regard to the projects in question.



341 White Pond Drive  
Akron, OH 44320

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

September 23, 2025

DATE OF DEPOSIT

JAN 28 2026

**VIA ELECTRONIC MAIL**

Todd S. Stewart  
HMS Legal LLP  
[tsstewart@hmslegal.com](mailto:tsstewart@hmslegal.com)

PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

**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 black 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).

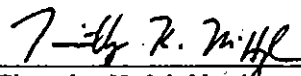
Service by electronic mail as follows:

Todd S. Stewart, Esquire  
HMS Legal LLP  
[tsstewart@hmslegal.com](mailto: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](mailto: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**
- **CYME 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.**

FirstEnergy Pennsylvania Electric Company Response to  
Sunrise Energy, LLC Interrogatory Set I, No. 4

Witness: Neil Trout

Page 1

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

**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. FE PA is not obligated to implement unproven technologies which may impact other customers or cause increased costs to rate payers.

**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



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](mailto:tsstewart@hmslegal.com)

DATE OF DEPOSIT

JAN 28 2026

PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

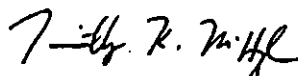
**Re: Sunrise Energy, LLC v. FirstEnergy Pennsylvania Electric Company**  
**Docket Nos. C-2025-3056807**

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**

:  
:  
:  
:  
:  
:

**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).

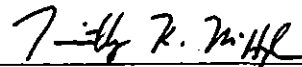
Service by electronic mail as follows:

Todd S. Stewart, Esquire  
HMS Legal LLP  
[tsstewart@hmslegal.com](mailto: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](mailto: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.**

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

**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.**

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

**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.**

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

**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.**

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

**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.**

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

**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.**

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

**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.**

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

**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.**

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

**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.”**

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

**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.**

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

**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.**

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

**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.***

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

**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.**

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

**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.**

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

**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.**

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

**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.

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

**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.

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

**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

DATE OF DEPOSIT

JAN 28 2026

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

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

**CERTIFICATE OF SERVICE**

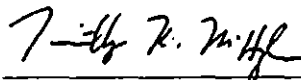
I hereby certify that I have this day served a true copy of the Answer of FirstEnergy Pennsylvania Electric Company to the Motion for Sanctions of Sunrise Energy LLC upon the individual listed below, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

Service by electronic mail as follows:

Chief Administrative Law Judge  
Charles E. Rainey, Jr.  
[crainey@pa.gov](mailto:crainey@pa.gov)

Todd S. Stewart  
[tsstewart@hmslegal.com](mailto:tsstewart@hmslegal.com)  
*Counsel for Sunrise Energy LLC*

Dated: January 27, 2026

  
 \_\_\_\_\_  
 Timothy K. McHugh  
 FirstEnergy Service Company  
 76 South Main Street  
 Akron, OH 44308  
 (610) 301-9072  
[tmchugh@firstenergycorp.com](mailto:tmchugh@firstenergycorp.com)

Counsel for FirstEnergy Pennsylvania Electric  
Company



**Extremely Urgent**

Call 1-800-PICK-UPS® (1-8C)

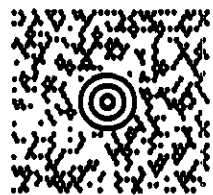
TIMOTHY MCHUGH  
(717) 608-0742  
THE UPS STORE #0698  
STE 106  
4900 CARLISLE PIKE  
MECHANICSBURG PA 17050-7709

1 LBS 1 OF 1  
SHP WT: 1 LBS  
DWT: 13.11.2  
DATE: 28 JAN 2026

This box is for use

SHIP MATTHEW HORNSHER, SECRETARY  
TO: PA PUBLIC UTILITY COMMISSION  
FL 2  
400 NORTH ST

HARRISBURG PA 17120-0202



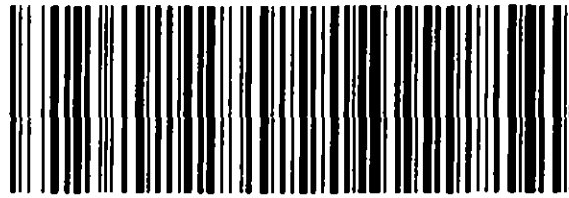
PA 172 9-24



UPS NEXT DAY AIR

1

TRACKING #: 1Z A83 5B8 01 4416 2403



BILLING: P/P

RECEIVED

JAN 29 2026

REF #: KCB

PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU  
PUBLIC UTILITY COMMISSION  
400 NORTH ST  
FL 2  
HARRISBURG PA 17120

Small Box

90% Post-Consumer Content

P:METROS:

6002-5714

1Z A83 5B8 01 4416 2403 11  
SAT08405 XLE SAS05-3 Jan 28 05:27:0  
US 1722 UDC 25.8 SATOLR

International Shipping Notice — Carriage hereunder may be subject to the rules relating to liability and other terms and/or conditions established by the Convention for the Unification of International Carriage by Air (the "Warsaw Convention") and/or the Convention on the Contract for the International Carriage of Goods by Road (the "CMR Convention"). These or software were exported from the U.S. in accordance with the Export Administration Regulations. Diversion contrary to U.S. law prohibited.