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March 5, 2026

VIA E-FILING

Matthew Homsher, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor North
P.O. Box 3265
Harrisburg, PA 17105-3265

Re: PETITION OF FIRSTENERGY PENNSYLVANIA ELECTRIC
COMPANY FOR APPROVAL OF ITS DEFAULT SERVICE PROGRAM
FOR THE PERIOD JUNE 1, 2027 TO MAY 31, 2031.
Docket No. P-2026-3060298

Dear Secretary Homsher:

Enclosed for electronic filing please find Dimension PA 1 LLC's Petition to Intervene in the above-referenced matter. Copies will be served in accordance with the attached Certificate of Service.

Best regards,

A handwritten signature in blue ink that reads "Daniel B. Markind".

Daniel B. Markind

DBM/lm

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

PETITION OF FIRSTENERGY :
PENNSYLVANIA ELECTRIC : Docket No. P-2026-3060298
COMPANY FOR APPROVAL OF ITS :
DEFAULT SERVICE PROGRAM FOR :
THE PERIOD JUNE 1, 2027 TO MAY 31, :
2031. :

PETITION TO INTERVENE OF DIMENSION PA 1 LLC

Pursuant to Sections 5.71 through 5.74 of the Pennsylvania Public Utility Commission’s (“PUC” or “Commission”) Regulations, 52 Pa Code §§5.71-5.74, Dimension PA 1 LLC (“Dimension”), hereby files this petition to intervene as a party in the above-captioned proceeding filed by FirstEnergy Pennsylvania Electric Company (“FE PA” or “Company”). In support of this Petition to Intervene, Dimension states as follows:

I. **BACKGROUND**

1. On February 2, 2026, FE PA filed for approval of its Default Service Program for the period of June 1, 2027 until May 31, 2031.

II. **PROPOSED INTERVENOR**

2. Dimension is the parent of many special purpose entity limited liability companies (“SPEs”) that are engaged in the development, ownership, and operation of solar photovoltaic power generation throughout the Commonwealth, including within FE-PA’s service territory.

3. The attorney for Dimension in this matter is:

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Counsel consents to electronic service pursuant to 52 Pa. Code § 1.54(b)(3).

III. DIMENSION MEETS THE STANDARDS FOR INTERVENTION

4. Dimension meets the standards for intervention set forth in 52 Pa. Code § 5.72(a). Dimension owns numerous SPEs in the Company's service territory that are customers of the utility generating power from solar photovoltaic power generation. As such, Dimension possesses an "interest which may be directly affected and which is not adequately represented by existing participants, and as to which the Petitioner may be bound by the action of the Commission in the proceeding." 52 Pa. Code § 5.72(a)(1).

5. Dimension's SPEs own solar photovoltaic power generation projects in FE PA's service area that are eligible for net metering under 52 Pa. Code § 75.13 and have executed Interconnection Service Agreements ("ISAs") under FE PA's Commission-approved interconnection rules.

6. As Dimension's SPEs are retail customers in the Company's service territory, Dimension has a direct and substantial interest in several of FE PA's proposals.

For example:

- a. FE PA's proposed tariff revisions would alter the method of

assigning rate classes for customer-generators.

b. Under the proposal, certain projects would be reassigned to large commercial and industrial rate schedules, where exported generation is compensated at a rate that is lower than the rate that would be applicable under the project's previously applicable small general service rate.

These changes would materially and adversely affect Dimension's existing and planned projects by: (a) reducing the compensation value of exported generation; (b) increasing revenue volatility; (c) undermining the economic assumptions used in financing and contractual arrangements; and (d) applying to projects with existing ISAs without any grandfathering or transition mechanism.

7. Dimension also has an interest in ensuring that the proposals of other parties that are advanced through testimony, legal arguments, or settlement discussions do not adversely impact the ability of Dimension members to effectively operate as customer-generators in the FE PA service territory.

8. Dimension seeks to ensure that the Commission's decision complies with Pennsylvania's AI PS statutory requirements (73 P.S. §§ 1648.1 et seq.), the Commission's net-metering regulations (52 Pa. Code §§ 75.11-75.14) and the Commission's non-discriminatory access and least-cost procurement principles codified in 66 Pa. C.S. § 2807(e)(3.4).

9. Dimension's interests in this proceeding are unique from and would not be adequately represented by other parties, including individual customer-generators or

organizations interested in solar photovoltaic power generation in Pennsylvania in general and in the Company's service territory in particular.

10. Customer-generators will be bound by the action of the Commission in this proceeding, as well as the terms and conditions related to FE PA's tariff. Thus, the Commission's actions regarding the FE PA's proposals may have a substantial impact on the future involvement of Dimension in the FE PA's service territory.

11. Intervention by Dimension as a party is in the public interest because its participation would enable Dimension to contribute the unique perspectives of its members operating as licensed customer-generators in the Company's service territory and offer a complete presentation of the issues to be addressed in this proceeding. Through exploration of the issues that have been preliminarily identified by Dimension, as well as others that it addresses in this proceeding, the Commission can best serve the public interest through the development of a more complete record.

12. Dimension reserves the right to raise and address additional issues identified through its continued review and analysis of the filing (and related information), or other issues raised by the parties in this proceeding.

WHEREFORE, Dimension PA 1 LLC respectfully requests that the Pennsylvania Public Utility Commission grant its Petition to Intervene providing the Customer-Generator Dimension with full-party status in this proceeding, as well as any other relief as it deems necessary.

Respectfully submitted,



Dated: March 5, 2026

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Counsel to Dimension PA 1 LLC

VERIFICATION

BRANDON SMITHWOOD, being duly sworn according to law, deposes and says that he is an Vice President of Dimension and that in this capacity he is authorized to and does make this affidavit for them, and states that the facts set forth in the foregoing Petition to Intervene are true and correct to the best of his knowledge, information, and belief, and that he expects to be able prove the same at a hearing in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa. C.S. #4904 (relating to unsworn falsification to authorities).

Dated: March 4, 2026



Brandon Smithwood, Vice President

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true and correct copy of the foregoing Petition to Intervene upon the following parties of record in accordance with 52 Pa. Code § 1.54 (relating to service by a participant):

VIA EMAIL:

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| <p>The Honorable Mark A. Hoyer Deputy Chief Administrative Law Judge Pennsylvania Public Utility Commission Piatt Place, Suite 220 201 Fifth Avenue Pittsburgh, PA 15222 mhoyer@pa.gov</p> | <p>The Honorable Erin L. Gannon Administrative Law Judge Pennsylvania Public Utility Commission Commonwealth Keystone Building 400 North Street Harrisburg, PA 17120 egannon@pa.gov</p> |
| <p>Kenneth M. Kulak, Esq. Brooke E. McGlinn, Esq. Morgan, Lewis & Bockius LLP 1701 Market Street Philadelphia, PA 19103-2921 ken.kulak@morganlewis.com brooke.mcglinn@morganlewis.com</p> | <p>Tori L. Giesler, Esq. Angelina Umstead, Esq. FirstEnergy Service Company 2800 Pottsville Pike Reading, PA 19612-6001 tgiesler@firstenergycorp.com aumstead@firstenergycorp.com</p> |
| <p>Harrison W. Breitman, Esq. Olivia M. Spergel, Esq. Katherine M. Kennedy, Esq. Office of Consumer Advocate 5th Floor Forum Place 555 Walnut Street Harrisburg PA 17101-1923 HBreitman@paoca.org OSpergel@paoca.org KKennedy@paoca.org</p> | <p>Allison C. Kaster, Esq. Director & Chief Prosecutor Pennsylvania Public Utility Commission Bureau of Investigation and Enforcement Commonwealth Keystone Building 400 North Street Harrisburg, PA 17120 akaster@pa.gov</p> |
| <p>NazAarah Sabree, Small Business Advocate Office of Small Business Advocate Forum Place – First Floor 555 Walnut Street Harrisburg, PA 17101 ra-sba@pa.gov</p> | <p>Charis Mincavage, Esq. McNees, Wallace & Nurick, LLC 100 Pine Street P.O. Box 1166 Harrisburg, PA 17108-1166 cmincavage@mcneeslaw.com</p> |

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| <p>Thomas J. Sniscak, Esq. Whitney E. Snyder, Esq. Hawke McKeon & Sniscak, LLP 100 North Tenth Street Harrisburg, PA 17101 tjsniscak@hmslegal.com wesnyder@hmslegal.com</p> | <p>Deanne M. O'Dell, Esq. Eckert Seamans Cherin & Mellott, LLC 213 Market Street, 8th Floor P.O. Box 1248 Harrisburg, PA 17101 dodell@eckertseamans.com</p> |
| <p>Michael A. Gruin, Esq. Stevens & Lee 17 North 2nd Street, 16th Floor Harrisburg, PA 17101 michael.gruin@stevenslee.com</p> | <p>A. Michael Gianantonio* Robert F. Daley Robert Peirce & Associates, P.C. 707 Grant Street Gulf Tower, Suite 125 Pittsburgh, PA 15219 mgianantonio@peircelaw.com</p> |
| <p>John M. White* Constellation Energy Generation, LLC 101 Constitution Avenue, N.W. Suite 400 East Washington, DC 20001 john.white@constellation.com</p> | <p>Elizabeth R. Marx, Esq. Pennsylvania Utility Law Project Counsel for CAUSE-PA 118 Locust Street Harrisburg, PA 17101 717-710-3825 emarx@pautilitylawproject.org</p> |

Respectfully submitted,



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Counsel to Dimension PA 1 LLC