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March 16, 2026

VIA ELECTRONIC FILING

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

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

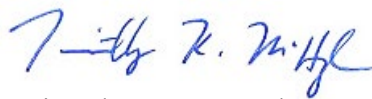
Dear Secretary Homsher:

Enclosed for filing please find the Prehearing Conference Memorandum of FirstEnergy Pennsylvania Electric Company in the above-referenced matter.

As indicated on the attached Certificate of Service, copies have been served on the parties in the manner indicated.

Please contact me with any questions regarding this matter.

Very truly yours,



Timothy K. McHugh

Enclosures

c: As Per Certificate of Service

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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

**PREHEARING CONFERENCE MEMORANDUM
OF FIRSTENERGY PENNSYLVANIA ELECTRIC COMPANY**

FirstEnergy Pennsylvania Electric Company (“FE PA” or the “Company”) hereby submits its Prehearing Conference Memorandum in the above-captioned proceeding pursuant to the Prehearing Conference Order issued by Administrative Law Judge Mark A. Hoyer (“ALJ Hoyer”) on February 4, 2026, and the Pennsylvania Public Utility Commission's (“Commission”) regulations at 52 Pa. Code § 5.222(d), and states as follows:

I. PROCEDURAL HISTORY

This proceeding was initiated on August 11, 2025, when Sunrise Energy, LLC (“Sunrise”) filed the above-captioned Formal Complaint against FE PA. The Formal Complaint alleges, among other things, that FE PA failed to provide Sunrise with reasonable service and acted in a discriminatory manner towards Sunrise in violation of Sections 1501 and 1502 of the Public Utility Code, 66 Pa.C.S. §§ 1501, 1502, when it rejected Sunrise’s alternative mitigation measures Sunrise proposed would provide for safe and reliable interconnection for three of Sunrise’s net metering solar projects.

FE PA timely filed its Answer to the Formal Complaint on or about September 2, 2025. FE PA denied the allegations of the Formal Complaint since the Company had considered reducing

substation output voltage during its analysis of interconnecting Sunrise's net metering solar projects.

On September 3, 2025, Sunrise propounded Set I Interrogatories ("Set I Discovery") on the Company. On September 4, 2025, Sunrise propounded Set II Interrogatories ("Set II Discovery") on FE PA. On September 23, 2025, FE PA responded to Set I Discovery, and the Company responded to Set II Discovery on September 24, 2025.

After providing its responses to Sunrise's Discovery Requests, the parties engaged in settlement discussions in an attempt to resolve this matter. The settlement discussions occurred over several months; however, the parties were unable to achieve a settlement.

On January 22, 2026, Sunrise filed a Motion for Sanctions Requiring Appropriate Responses to Interrogatories and Requests for Production of Documents, Set I and Set II ("Motion for Sanctions"). More specifically, Sunrise alleged that certain of FE PA's responses to Set I Discovery and Set II Discovery, in which the Company asserted that the information sought was Confidential Security Information and/or Bulk Electric System Cyber System Information, should require the Company to make an accommodation to allow Sunrise to review the requested information that it claims Sunrise is entitled to..

On January 27, 2026, the Company filed its Answer to Sunrise's Motion for Sanctions. In doing so, the Company denied that Sunrise set forth a 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. In addition, the Company submitted that if it is determined that the highly-sensitive information sought by Sunrise must be disclosed, then a Protective Order must be entered prior to any of the information sought can or should be disclosed.

By Notice dated February 4, 2026, the parties were informed of a Prehearing Conference

to be held on March 17, 2026, before the Honorable Administrative Law Judge Mark A. Hoyer.

On February 13, 2026, Sunrise filed a Petition to Leave to Withdraw its Formal Complaint stating, for the first time, that the relief sought will become “moot” if not addressed in the near term and noting that it wishes to have the flexibility to “pursue other remedies as appropriate,” which includes a reservation of right to relief with the Commission in the future. On February 23, 2026, the Company filed its Objection to the Petition of Sunrise for Leave to Withdraw its Formal Complaint (“Objection”) requesting that the parties continue the litigation of the Formal Complaint to ensure the time and resources expended by the Company and the Commission are not wasted or that Sunrise withdraw its Formal Complaint with prejudice. On February 26, 2026, Sunrise filed its Answer to the Company’s Objection.

II. SERVICE OF DOCUMENTS

FE PA requests that all documents be served on:

Tori L. Giesler (PA ID # 207742)
Timothy K. McHugh (PA ID # 317906)
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341 White Pond Drive
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FE PA agrees to receive service of documents electronically in this proceeding.

III. ISSUES

FE PA intends to demonstrate that Sunrise has failed to carry its burden of proof that FE PA has violated the Public Utility Code or the Commission’s regulations by failing to provide Sunrise with reasonable service or that the Company acted in a discriminatory manner towards Sunrise. Furthermore, the Company intends to demonstrate that Sunrise failed to carry its burden

of proof that it should be provided access to highly-sensitive information or that its Motion for Leave to Withdraw its Formal Complaint should be granted. While FE PA has preliminarily identified the preceding issues, it reserves the right to raise and/or respond to further issues asserted by Sunrise in any testimony presented in this proceeding.

IV. WITNESSES

V. FE PA is still evaluating the witnesses it intends to call in order to rebut Sunrise's allegations and intends to preliminarily identify its witness(es) by no later than March 31, 2026. The Company reserves the right to modify its witness following that date. The Company also requests that Sunrise identify its witness(es) by no later than March 31, 2026. PROCEDURAL SCHEDULE

FE PA proposes the following procedural schedule:

Direct Testimony	April 21, 2026
Rebuttal Testimony	May 12, 2026
Surrebuttal Testimony	May 26, 2026
Oral Rejoinder Testimony	June 4, 2026
Evidentiary Hearings	June 9, 2026

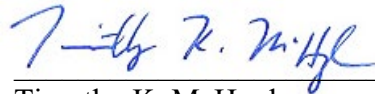
VI. DISCOVERY

FE PA does not propose any modifications to the Commission's discovery regulations at this time. FE PA reserves its rights to propose modifications if the schedule adopted in this proceeding differs from that proposed and contains abbreviated periods between rounds of testimony.

VII. SETTLEMENT

The Parties have engaged in settlement discussions, and, to date, it does not appear as if a settlement is possible. The Company, however, does not object to further discussions with Sunrise.

Respectfully submitted,



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Dated: March 16, 2026

*Counsel for FirstEnergy Pennsylvania
Electric Company*

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

SUNRISE ENERGY, LLC

v.

**FIRSTENERGY PENNSYLVANIA
ELECTRIC COMPANY**

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: **Docket No. C-2025-3056807**
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CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true and correct copy of the Prehearing Conference Memorandum of FirstEnergy Pennsylvania Electric Company 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 only as follows:

Mark A. Hoyer, Administrative Law Judge
Pennsylvania Public Utility Commission
Office of Administrative Law Judge
mhoyer@pa.gov

Todd S. Stewart
Hawke McKeon & Sniscak LLP
Counsel for Sunrise Energy, LLC
TSSStewart@hmslegal.com

Dated: March 16, 2026



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