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March 16, 2026

**VIA ELECTRONIC FILING**

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

RE: Sunrise Energy, LLC v. FirstEnergy Pennsylvania Electric Company; Docket No. C-2025-3056807; **PREHEARING CONFERENCE MEMORANDUM OF SUNRISE ENERGY, LLC**

Dear Secretary Homsher:

Enclosed for filing with the Pennsylvania Public Utility Commission is the Prehearing Conference Memorandum of Sunrise Energy, LLC in the above-captioned matter. A copy of this Petition has been served as indicated on the attached Certificate of Service.

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

Very truly yours,

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

Todd S. Stewart  
*Counsel for Sunrise Energy, LLC*

TSS/jld  
Enclosure

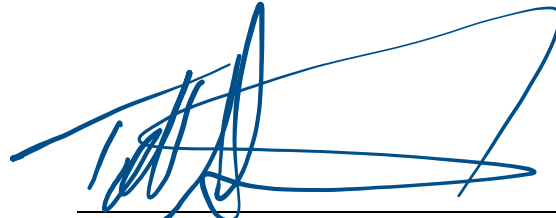
cc: Administrative Law Judge Mark A. Hoyer (via electronic mail – [mhoyer@pa.gov](mailto:mhoyer@pa.gov))  
Per Certificate of Service

**CERTIFICATE OF SERVICE**

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

**VIA ELECTRONIC MAIL**

Tori L. Giesler, Esquire  
Timothy McHugh, Esquire  
FirstEnergy Service Company  
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Akron, OH 044320  
[tgiesler@firstenergycorp.com](mailto:tgiesler@firstenergycorp.com)  
[tmchugh@firstenergycorp.com](mailto:tmchugh@firstenergycorp.com)  
*Counsel for FirstEnergy Pennsylvania Electric  
Company*



\_\_\_\_\_  
Todd S. Stewart

DATED: March 16, 2026

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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

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**PREHEARING CONFERENCE MEMORANDUM  
OF SUNRISE ENERGY, LLC**

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Sunrise Energy, LLC (“Sunrise” 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 filed the above-captioned Formal Complaint against FirstEnergy Pennsylvania Electric Company (“FEPA”). The Formal Complaint alleges, among other things, that FEPA 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 would provide for safe and reliable interconnection for three of Sunrise’s net metering solar projects.

FE PA 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 FE PA 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.

On January 27, 2026, the Company filed its Answer to Sunrise's Motion for Sanctions. 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 that the relief sought is or soon will be "moot" and including a reservation of the 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”) opposing an order withdrawing the Complaint with prejudice. On February 26, 2026, Sunrise filed its Answer to the Company’s Objection.

**II. SERVICE OF DOCUMENTS**

Sunrise Energy requests that all documents be served on:

Todd S. Stewart  
HMS Legal LLP  
501 Corporate Circle, Suite 302  
Harrisburg, PA 17110  
(717) 703-0806  
(717) 236-4841 (fax)  
[tsstewart@hmslegal.com](mailto:tsstewart@hmslegal.com)

Sunrise Energy agrees to receive service of documents electronically in this proceeding.

**III. ISSUES**

First and foremost, is the issue of the motion to withdraw the Complaint, which should be resolved in favor of withdrawing the Complaint to avoid further litigation that has become unnecessary due to the passage of time. Failing that, the issues are FEPA’s failure to provide reasonable service and its refusal to permit access to documents that it claims are the basis for its determination that Sunrise’s applications for interconnection would have required multi-million-dollar upgrades.

**IV. WITNESSES**

Sunrise is still evaluating the witnesses it intends to call.

**V. PROCEDURAL SCHEDULE**

Sunrise believes that prior to a procedural schedule being discussed, the Motion to withdraw, to save the time and resources of all parties, should be addressed and granted.

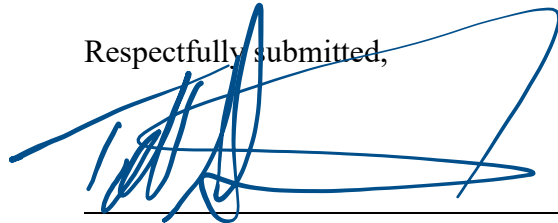
**VI. DISCOVERY**

If necessary, Sunrise will conduct appropriate discovery. If its Motion to withdraw is denied, then Sunrise will pursue its motion for sanctions and will need an elongated schedule to allow it to address the results of that effort.

**VII. SETTLEMENT**

The Parties have engaged in settlement discussions, and, to date, it does not appear as if a settlement is possible. Sunrise does not object to further discussions and in fact has proposed such.

Respectfully submitted,



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*Counsel for Sunrise Energy, LLC*

DATED: March 16, 2026