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March 17, 2026

VIA ELECTRONIC FILING

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

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:

Attached for filing with the Pennsylvania Public Utility Commission is the Joint Prehearing Memorandum of the Met-Ed Industrial Users Group ("MEIUG"), the Penelec Industrial Customer Alliance ("PICA"), and the West Penn Power Industrial Intervenors ("WPPII") (collectively, the "Industrial Customer Groups"), in the above-referenced proceeding.

As evidenced by the attached Certificate of Service, all parties to this proceeding are being duly served with a copy of this document. Thank you.

Very truly yours,

A handwritten signature in black ink that reads 'Charis Mincavage'.

Charis Mincavage
MCNEES WALLACE & NURICK LLC

Counsel to the Met-Ed Industrial Users Group,
the Penelec Industrial Customer Alliance,
and the West Penn Power Industrial Intervenors

c: Deputy Chief Administrative Law Judge Mark A. Hoyer (via email)
Administrative Law Judge Erin L. Gannon (via email)
Certificate of Service

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the foregoing document upon the participants, listed below, in accordance with the requirements of Section 1.54 (relating to service by a participant).

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Dated this 17th day of March, 2026, in Harrisburg, Pennsylvania.

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of FirstEnergy Pennsylvania :
Electric Company for Approval of Its : Docket No. P-2026-3060298
Default Service Program for the Period :
June 1, 2027, to May 31, 2031 :

**JOINT PREHEARING MEMORANDUM OF
THE MET-ED INDUSTRIAL USERS GROUP,
THE PENELEC INDUSTRIAL CUSTOMER ALLIANCE, AND
THE WEST PENN POWER INDUSTRIAL INTERVENORS**

Pursuant to the February 19, 2026, Prehearing Conference Order issued by Deputy Chief Administrative Law Judge ("DCALJ") Mark A. Hoyer and Administrative Law Judge ("ALJ") Erin L. Gannon, the Med-Ed Industrial Users Group ("MEIUG"), the Penelec Industrial Customer Alliance ("PICA"), and the West Penn Power Industrial Intervenors ("WPPII") (collectively, the "Industrial Customer Groups"), hereby submit this Prehearing Memorandum in the above-captioned proceeding.

I. HISTORY OF THE PROCEEDING

On February 3, 2026, FirstEnergy Pennsylvania Electric Company ("FE PA" or "Company") petitioned the Pennsylvania Public Utility Commission ("PUC" or "Commission") for approval of a proposed plan for the terms and conditions under which FE PA would supply default service from June 1, 2027, through May 31, 2031.¹

On February 24, 2026, the Industrial Customer Groups filed a Joint Petition to Intervene in this proceeding. A description of the Industrial Customer Groups is set forth in Paragraphs 1 and 2 of the Joint Petition to Intervene.

¹ *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 (Feb. 3, 2026) ("Petition" or "DSP VII").

A Prehearing Conference has been scheduled in this proceeding for March 19, 2026.

II. LEAD COUNSEL

The Industrial Customer Groups are represented in this matter by:

Susan E. Bruce (Pa. I.D. No. 80146)
Charis Mincavage (Pa. I.D. No. 82039)
Matthew Garber (Pa. I.D. No. 322855)
Rebecca Kimmel (Pa. I.D. No. 335097)
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Additionally, Charis Mincavage will speak as the lead attorney for purposes of the Prehearing Conference.

III. ANTICIPATED ISSUES AND SUB-ISSUES

As users of substantial volumes of electricity in the Company's service territory, the Industrial Customer Groups are in a unique position to comment to the Commission on the customer impact of the proposed DSP VII and the consequences for Large Commercial and Industrial ("C&I") customers. The Industrial Customer Groups are concerned with issues regarding the terms and conditions of their members' electricity service and, therefore, intend to examine issues related to the applicability of FE PA's proposed DSP VII to Large C&I customers. The Industrial Customer Groups also reserve the right to raise further issues as necessary and appropriate during the course of this proceeding and to respond to issues raised by other parties.

IV. PROPOSED WITNESSES

The Industrial Customer Groups are evaluating whether they will sponsor testimony in this proceeding. If the Industrial Customer Groups decide to sponsor testimony, they will inform the parties and the ALJs of any intended witnesses and topics of testimony. The Industrial Customer Groups also intend to participate in this proceeding through the submission of discovery, cross-examination of other parties' witnesses, and the submission of briefs, exceptions, and reply exceptions, if necessary.

V. PROPOSED SCHEDULE AND DISCOVERY RULES

The Industrial Customer Groups will cooperate with the ALJs and the parties at the Prehearing Conference to develop an appropriate procedural schedule and discovery rules in accordance with the Commission's regulations and any directives issued by the ALJs.

VI. POSSIBILITY OF SETTLEMENT

The Industrial Customer Groups are willing to participate in settlement discussions with the other parties to amicably resolve the issues in this proceeding, subject to Commission approval.

Respectfully submitted,

McNEES WALLACE & NURICK LLC

By 

Susan E. Bruce (Pa. I.D. No. 80146)
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Matthew Garber (Pa. I.D. No. 322855)
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Dated: March 17, 2026