

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

PETITION OF FIRSTENERGY
PENNSYLVANIA ELECTRIC
COMPANY FOR APPROVAL OF ITS
DEFAULT SERVICE PROGRAM FOR
THE PERIOD JUNE 1, 2027 TO MAY 31,
2031.

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: Docket No. P-2026-3060298
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**PRE-HEARING CONFERENCE MEMORANDUM SUBMITTED BY DIMENSION
PA 1 LLC**

Pursuant to the Pre-Hearing Conference Order dated February 19, 2026, Dimension PA 1 (“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. FE PA’s proposed tariff’ revisions would alter the method of assigning rate classes for customer-generators:

a. 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 projects’ previously applicable small general service rate.

b. These changes would materially and adversely affect Dimension’s existing and

planned projects and the projects of other companies 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 existing projects without any grandfathering or transition mechanism.

II. WITNESSES:

Dimension may call Brandon Smithwood, Vice President of Policy for Dimension, (3050 Peachtree Rd | Atlanta, GA 30305) to testify as to why First Energy's proposals, if accepted, would be improperly prejudicial, discriminatory, unfair to customers of First Energy who engage in exported generation, and otherwise do not comply with law. As discovery proceeds, Dimension reserves the right to call additional witnesses,

III. DISCOVERY

At this point in time, Dimension has no plans to propound discovery, but reserves the right to do so if responses by First Energy to the discovery requests of other parties require further inquiry. All discovery in this matter should be concluded five days prior to the anticipated start of oral hearings.

IV SCHEDULE

Dimension objects to the litigation schedule requested by FirstEnergy in the Petition. Dimension proposes the following revisions and further agrees to work collaboratively with

FirstEnergy and all other parties to develop a litigation schedule.

<u>Action</u>	<u>Date Proposed by FirstEnergy</u>	<u>Counter-proposed Dates</u> <u>By Dimension</u>
Prehearing Conference	March 5, 2026	(March 19, 2026)
Other Parties' Direct Testimony	April 15, 2026	May 18, 2026
Rebuttal Testimony	May 13, 2026	June 22, 2026
Surrebuttal Testimony	May 29, 2026	July 27, 2026
Oral Rejoinder and Hearings	June 3, 2026	August 4, 2026
Main Briefs	June 24, 2026	September 4, 2026
Reply Briefs	July 8, 2026	September 25, 2026
Recommended Decision	August 19, 2026	November 6, 2026
Commission Order	October 22, 2026	January 11, 2027

V. Lead Counsel for Dimension

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Respectfully submitted,



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Dated: March 17, 2026

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Dated: March 17, 2026

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true and correct copy of the foregoing Pre-Hearing Conference Memorandum Submitted By Dimension Pa 1 LLC upon the following parties of record in accordance with 52 Pa. Code § 1.54 (relating to service by a participant):

VIA EMAIL:

<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</p>	<p>Charis Mincavage, Esq. McNees, Wallace & Nurick, LLC 100 Pine Street</p>

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<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>
<p>Melissa A Chapaska, Esquire Todd S. Stewart, Esquire Whitney E. Snyder, Esquire Erich W. Struble, Esquire HMS Legal LLP 501 Corporate Circle, Suite 302 Harrisburg, PA 17110 machapaska@hmslegal.com tsstewart@hmslegal.com wesnyder@hmslegal.com ewstruble@hmslegal.com</p>	<p>Christopher O'Hara Sr. VP and General Counsel Law & Chief Compliance Officer PJM Interconnection LLC 2750 Monroe Boulevard Audubon, PA 19403-2497 christopher.ohara@pjm.com</p>

<p>Colleen Kartychak, Manager Constellation Energy Generation LLC 1310 Point Street, 8th Floor Baltimore, MD 21231 Colleen.kartychak@constellation.com</p>	<p>Susan E. Bruce, Esquire Charis Mincavage, Esquire Matthew Garber, Esquire Rebecca Kimmel, Esquire McNees Wallace & Nurick 100 Pine Street P.O. Box 1166 Harrisburg, PA 17101 sbruce@mcneeslaw.com cmincavage@mcneeslaw.com mgarber@mcneeslaw.com rkimmel@mcneeslaw.com</p>
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Respectfully submitted,



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Dated: March 17, 2026

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