

# Morgan Lewis

**Kenneth M. Kulak**

Partner  
+1.215.963.5384  
ken.kulak@morganlewis.com

April 7, 2026

**VIA eFILING**

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

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

Dear Secretary Homsher:

Enclosed for filing in the above-captioned proceedings, is the **Certificate of Service** evidencing service of the **Objections of FirstEnergy Pennsylvania Electric Company to Penn Renewables, LLC's Interrogatories and Requests for Production of Documents (Set I, Question Nos. 12, 15, 17-19, 21-22 and 25.**

As indicated in the Certificate of Service, copies have been served upon all parties of record.

If you have any questions, please contact me directly at 215.963.5384. Thank you.

Very truly yours,



Kenneth M. Kulak

Enclosures

c: Per Certificate of Service (w/encls.)

DB1/ 168195183.1

**Morgan, Lewis & Bockius LLP**

2222 Market Street  
Philadelphia, PA 19103-3007  
United States

**T** +1.215.963.5000  
**F** +1.215.963.5001

**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 FROM JUNE 1, 2027 TO** :  
**MAY 31, 2031** :

**CERTIFICATE OF SERVICE**

I hereby certify and affirm that I have on this day served copies of the **Objections of FirstEnergy Pennsylvania Electric Company to Penn Renewables, LLC’s Interrogatories and Requests for Production of Documents (Set I)** on the persons listed below, in the manner specified in accordance with the requirements of 52 Pa. Code § 1.54:

**VIA ELECTRONIC MAIL**

Harrison W. Breitman\*  
Katherine “Katie” Kennedy\*  
Olivia M. Spergel\*  
Office of Consumer Advocate  
Forum Place - 5th Floor  
555 Walnut Street  
Harrisburg PA 17101-1923  
[OCAFEPADSP26@paoca.org](mailto:OCAFEPADSP26@paoca.org)  
*Counsel for the Office of Consumer Advocate*

Rebecca Lyttle\*  
Office of Small Business Advocate  
Forum Place – 1st Floor  
555 Walnut Street  
Harrisburg, PA 17101  
[relyttle@pa.gov](mailto:relyttle@pa.gov)  
*Counsel for the Office of Small Business Advocate*

Todd S. Stewart\*  
HMS Legal LLP  
501 Corporate Circle, Suite 302  
Harrisburg, PA 17110  
[tsstewart@hmslegal.com](mailto:tsstewart@hmslegal.com)  
*Counsel for Shipley Choice , LLC d/b/a  
Shipley Energy and Interstate Gas Supply LLC  
d/b/a IGS Energy EGS Parties*

Elizabeth R. Marx\*  
Lauren N. Berman\*  
Ria M. Pereira\*  
John W. Sweet\*  
Levi A. Phillips\*  
Pennsylvania Utility Law Project  
118 Locust Street  
Harrisburg, PA 17101  
[pulp@pautilitylawproject.org](mailto:pulp@pautilitylawproject.org)  
*Counsel for the Coalition for Affordable Utility  
Services and Energy Efficiency  
in Pennsylvania*

Melissa A. Chapaska\*  
HMS Legal LLP  
501 Corporate Circle, Suite 302  
Harrisburg, PA 17110  
[machapaska@hmslegal.com](mailto:machapaska@hmslegal.com)  
*Counsel for Penn Renewables LLC*

Whitney E. Snyder  
Erich W. Struble  
HMS Legal LLP  
501 Corporate Circle, Suite 302  
Harrisburg, PA 17110  
[wesnyder@hmslegal.com](mailto:wesnyder@hmslegal.com)  
[ewstruble@hmslegal.com](mailto:ewstruble@hmslegal.com)  
*Counsel for The Pennsylvania State University*

Susan E. Bruce\*  
Charis Mincavage\*  
Matthew Garber\*  
Rebecca Kimmel\*  
McNees, Wallace & Nurick, LLC  
100 Pine Street  
P.O. Box 1166  
Harrisburg, PA 17108-1166  
[sbruce@mcneeslaw.com](mailto:sbruce@mcneeslaw.com)  
[cmincavage@mcneeslaw.com](mailto:cmincavage@mcneeslaw.com)  
[mgarber@mcneeslaw.com](mailto:mgarber@mcneeslaw.com)  
[rkimmel@mcneeslaw.com](mailto:rkimmel@mcneeslaw.com)  
*Counsel for Met-Ed Industrial Users Group,  
Penelec Industrial Customer Alliance, and  
West Penn Power Industrial Intervenors*

Mitchell H. Kizner  
Flaster Greenberg, PC  
Commerce Center  
1810 Chapel Avenue West  
Cherry Hill, NJ 08002  
[mitchell.kizner@flastergreenberg.com](mailto:mitchell.kizner@flastergreenberg.com)  
*Counsel for Dimension PA 1 LLC*

Daniel B. Markind  
Flaster Greenberg, PC  
1717 Arch Street  
Suite 3300  
Philadelphia, PA 19103  
[Daniel.markind@flastergreenberg.com](mailto:Daniel.markind@flastergreenberg.com)  
*Counsel for Dimension PA 1 LLC*

Aron J. Beatty  
Duquesne Light Company  
800 North Third Street  
Harrisburg, PA 17402  
[abeatty@duqlight.com](mailto:abeatty@duqlight.com)  
*Counsel for Duquesne Light Company*

Nicholas A. Stobbe  
Stevens & Lee, P.C.  
17 North 2nd Street, 16th Floor  
Harrisburg, PA 17101  
[nicholas.stobbe@stevenslee.com](mailto:nicholas.stobbe@stevenslee.com)  
*Counsel for the Customer-Generator Coalition*

Michael A. Gruin  
Stevens & Lee, P.C.  
17 North Second Street, 16<sup>th</sup> Floor  
Harrisburg, PA 17101  
[michael.gruin@stevenslee.com](mailto:michael.gruin@stevenslee.com)  
*Counsel for WGL Energy Services Inc. and  
Town Square Energy East, LLC*

Donald R. Wagner  
Stevens & Lee, P.C.  
111 North Sixth Street  
Reading, PA 19603  
[donald.wagner@stevenslee.com](mailto:donald.wagner@stevenslee.com)  
*Counsel for WGL Energy Services Inc. and  
Town Square Energy East, LLC*

Colleen Kartychak  
Constellation Energy Generation, LLC  
1310 Point Street  
Baltimore, MD 21231  
[colleen.kartychak@constellation.com](mailto:colleen.kartychak@constellation.com)  
*Counsel for Constellation Energy Generation,  
LLC and Constellation NewEnergy, Inc.*

Linda S. Kizuka\*  
Constellation  
250 Massachusetts Avenue, NW  
Suite 760  
Washington, DC 20001  
[linda.kizuka@constellation.com](mailto:linda.kizuka@constellation.com)  
*Counsel for Constellation Energy Generation,  
LLC and Constellation NewEnergy, Inc.*

Marsha D. Makel\*  
Constellation  
1310 Point Street Legal – 8th Floor  
Baltimore, MD 21231  
[Marsha.Makel@constellation.com](mailto:Marsha.Makel@constellation.com)  
*Counsel for Constellation Energy Generation,  
LLC and Constellation NewEnergy, Inc.*

Samuel W. Cortes  
Ashley L. Beach  
Fox Rothschild LLP  
747 Constitution Drive, Suite 100  
Exton, PA 19341  
[scortes@foxrothschild.com](mailto:scortes@foxrothschild.com)  
[abeach@foxrothschild.com](mailto:abeach@foxrothschild.com)  
*Counsel for Solar Energy Industries  
Association and the Coalition for Community  
Solar Access*

R. Taylor Speer  
Fox Rothschild LLP  
2 West Washington Street, Suite 1100  
Greenville, SC 29601  
[tspeer@foxrothschild.com](mailto:tspeer@foxrothschild.com)  
*Counsel for Solar Energy Industries  
Association and the Coalition for Community  
Solar Access*

Karen M. Kemerait  
Fox Rothschild LLP  
301 Hillsborough Street, Suite 1120  
Raleigh, NC 27603  
[kkemerait@foxrothschild.com](mailto:kkemerait@foxrothschild.com)  
*Counsel for Solar Energy Industries  
Association and the Coalition for Community  
Solar Access*

Jamie L. Martines  
Spilman Thomas & Battle, PLLC  
301 Grant Street, Suite 3440  
Pittsburgh, PA 15219  
[jmartines@spilmanlaw.com](mailto:jmartines@spilmanlaw.com)  
*Counsel for Walmart, Inc.*

Barry A. Naum  
Steven W. Lee  
Spilman Thomas & Battle, PLLC  
1100 Bent Creek Boulevard, Suite 101  
Mechanicsburg, PA 17050  
[bnaum@spilmanlaw.com](mailto:bnaum@spilmanlaw.com)  
[slee@spilmanlaw.com](mailto:slee@spilmanlaw.com)  
*Counsel for Walmart, Inc.*

Deanne M. O'Dell\*  
Eckert Seamans Cherin & Mellott, LLC  
213 Market Street, 8<sup>th</sup> Floor  
Harrisburg, PA 17101  
[dodell@eckertseamans.com](mailto:dodell@eckertseamans.com)  
*Counsel for the Retail Energy Supply  
Association*

Lauren M. Burge\*  
Eckert Seamans Cherin & Mellott, LLC  
600 Grant Street, 44<sup>th</sup> Floor  
Pittsburgh, PA 15219  
[dodell@eckertseamans.com](mailto:dodell@eckertseamans.com)  
*Counsel for the Retail Energy Supply  
Association*

**WITNESSES / CONSULTANTS**

Mark Ewen\*  
Industrial Economics, Incorporated  
2067 Massachusetts Avenue  
Cambridge, MA 02140  
[MEwen@indecon.com](mailto:MEwen@indecon.com)  
*OSBA Witness*

Maksim Malukoff\*  
Industrial Economics, Incorporated  
2067 Massachusetts Avenue  
Cambridge, MA 02140  
[MMalukoff@indecon.com](mailto:MMalukoff@indecon.com)  
*OSBA Witness*

Serhan Ogur\*  
Exeter Associates, Inc.  
10480 Little Patuxent Parkway  
Suite 300  
Columbia, Maryland 21044  
[sogur@exeterassociates.com](mailto:sogur@exeterassociates.com)  
*OCA Witness*

Barbara R. Alexander\*  
Barbara Alexander Consulting, LLC  
83 Wedgewood Drive  
Winthrop, Maine 04364  
[barbalex@ctel.net](mailto:barbalex@ctel.net)  
*OCA Witness*

Patrick M. Cicero\*  
118 Locust Street  
Harrisburg, PA 17101  
[pcicero@pautilitylawproject.org](mailto:pcicero@pautilitylawproject.org)  
*CAUSE-PA Witness*

James L. Crist, P.E.  
Lumen Group, Inc.  
4226 Yarmouth Drive, Suite 101  
Allison Park, PA 15101  
[JLCrist@aol.com](mailto:JLCrist@aol.com)  
*PSU Witness*

Frank Lacey  
Electric Advisors Consulting  
3 Traylor Drive  
West Chester, PA 19382  
[frank@eacpower.com](mailto:frank@eacpower.com)  
*RESA Witness*

Thomas S. Michelman\*  
161 Worcester Road, Suit 503  
Framingham, MA 01791  
[tmichelman@seadvantage.com](mailto:tmichelman@seadvantage.com)  
*Solar Energy Industries Association and the  
Coalition for Community Solar Access  
Witness*



Kenneth M. Kulak (Pa. No. 75509)  
Brooke E. McGlinn (Pa. No. 204918)  
Morgan, Lewis & Bockius LLP  
2222 Market Street  
Philadelphia, PA 19103  
Telephone No.: 215.963.5384  
[ken.kulak@morganlewis.com](mailto:ken.kulak@morganlewis.com)  
[brooke.mcglinn@morganlewis.com](mailto:brooke.mcglinn@morganlewis.com)

Dated: April 7, 2026

*Counsel for FirstEnergy Pennsylvania  
Electric Company*

**\*=Executed Protective Order**