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April 20, 2026

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**Re: Verizon Pennsylvania LLC and Verizon North LLC v. Metropolitan Edison
Company, Pennsylvania Electric Company, and Pennsylvania Power Company
Docket No. C-2020-3019347**

Dear Counsel:

Enclosed are FirstEnergy Pennsylvania Electric Company's ("FE PA" or the "Company") Objections to the Interrogatories and Requests for Production of Documents of Verizon Pennsylvania LLC and Verizon North LLC (collectively, "Verizon") – Set IV, Nos. 1-4, 6-8, 11-12, 14, and 16 in the above-captioned proceeding.

Copies are being provided as indicated on the Certificate of Service.

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Christopher S. Huther, Esquire
April 20, 2026
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Respectfully submitted,



Devin Ryan

DR/bfc

Enclosures

cc: Certificate of Service
Matthew L. Homsher, Secretary (*Letter and Certificate of Service only*)

CERTIFICATE OF SERVICE

(Docket No. C-2020-3019347)

I hereby certify that a true and correct copy of the foregoing has been served upon the following persons, in the manner indicated, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

VIA E-MAIL ONLY

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Date: April 20, 2026



Devin T. Ryan

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Verizon Pennsylvania LLC and Verizon North LLC,	:	
	:	
	:	
Complainants	:	
	:	
v.	:	Docket No. C-2020-3019347
	:	
Metropolitan Edison Company, Pennsylvania Electric Company, and Pennsylvania Power Company,	:	
	:	
	:	
Respondents	:	

**OBJECTIONS OF FIRSTENERGY PENNSYLVANIA ELECTRIC COMPANY TO THE
INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS OF
VERIZON PENNSYLVANIA LLC AND VERIZON NORTH LLC – SET IV**

Pursuant to 52 Pa. Code §§ 5.342(c) and 5.349(d), FirstEnergy Pennsylvania Electric Company (“FE PA” or the “Company”),¹ by and through its attorneys, hereby serves these objections to the fourth set of interrogatories and requests for production of documents of Verizon Pennsylvania LLC (“Verizon Pennsylvania”) and Verizon North LLC (“Verizon North”) (collectively, “Verizon”) served on April 15, 2026 (“VZ to FE PA Set IV”).

FE PA objects to VZ to FE PA Set IV, Nos. 1-4, 6-8, 11-12, 14, and 16. As explained herein, the grounds for such objections are that one or more of these requests call for a special study or analysis, are overly broad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence, seek privileged information and materials, ask for drafts of

¹ On December 7, 2023, the Pennsylvania Public Utility Commission (“Commission”) entered an Order at Docket Nos. A-2023-3038771, et al. approving, among other things, the merger of Metropolitan Edison Company (“Met-Ed”), Pennsylvania Electric Company (“Penelec”), Pennsylvania Power Company (“Penn Power”), and West Penn Power Company (“West Penn”) into FE PA with FE PA as the surviving entity. Therefore, FE PA submits that all references to the three prior respondents in this matter should, instead, be made to FE PA as their successor in interest.

testimony and exhibits, and seek disclosure of facts and opinions held by expert witnesses prior to the service of their direct testimony in accordance with the litigation schedule.

In support, FE PA states as follows:

I. SPECIFIC OBJECTIONS

A. OBJECTIONS TO VZ TO FE PA SET IV, NO. 1

1. VZ to FE PA Set IV, No. 1 requests the following:

1. For each year beginning with 2020 for Met-Ed, Penelec, and Penn Power, and each year beginning with 2024 for FirstEnergy Pennsylvania, provide the New Telecom Rate for a communications provider's use of one foot of space on (a) Met-Ed's poles, (b) Penelec's poles, (c) Penn Power's poles, and (d) FirstEnergy Pennsylvania's poles. In answering this question, provide for each New Telecom Rate FirstEnergy's calculation of the rate and identify all inputs, assumptions, and source data used to calculate the rate, the person(s) who calculated the rate, and the date the rate was calculated. If FirstEnergy has not calculated a New Telecom Rate, provide all inputs and identify all source data required to calculate the rate. Provide all documents concerning all calculations and inputs, including all source data, if they are not publicly available. Separately present the information for poles owned by Met-Ed, Penelec, Penn Power, and FirstEnergy Pennsylvania.

2. FE PA objects to this request on the grounds that it is overly broad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence.

3. FE PA has four rate divisions, each of which corresponds to one of the former Pennsylvania utility operating companies that were merged to create FE PA: Met-Ed, Penelec, Penn Power, and West Penn.

4. The instant proceeding, however, only involves three of those rate divisions, namely the Met-Ed, Penelec, and Penn Power Rate Divisions.

5. As posited, VZ to FE PA Set IV, No. 1 requests information about the "New Telecom Rate for a communications provider's use of one foot of space" on "FirstEnergy Pennsylvania's poles," which would encompass West Penn Rate Division's rates and poles.

6. Therefore, by requesting this information about the West Penn Rate Division, the request is overly broad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence.

B. OBJECTIONS TO VZ TO FE PA SET IV, NO. 2

7. VZ to FE PA Set IV, No. 2 requests the following:

2. For each year beginning with 2020 for Met-Ed, Penelec, and Penn Power, and each year beginning with 2024 for FirstEnergy Pennsylvania, provide:

- (a) the rental or deficiency rate that FirstEnergy contends applies to Verizon's use of FirstEnergy's poles under the Joint Use Agreements and, if different, the rental or deficiency rate that FirstEnergy charged Verizon;
- (b) the number of FirstEnergy poles governed by the Joint Use Agreements that FirstEnergy contends have Verizon facilities attached;
- (c) the number of deficiency poles owned by Met-Ed that FirstEnergy contends are subject to a deficiency rate under the Joint Use Agreements;
- (d) the rental rate that FirstEnergy contends applies to FirstEnergy's use of Verizon's poles under the Joint Use Agreements and, if different, the rental rate reflected in a rental invoice issued by FirstEnergy; and
- (e) the number of Verizon poles governed by the Joint Use Agreements that FirstEnergy contends have FirstEnergy facilities attached.

In answering this question, provide for each rental or deficiency rate FirstEnergy's calculation of the rate and identify all inputs, assumptions, and source data used to calculate the rate, the person(s) who calculated the rate, and the date the rate was calculated. If FirstEnergy has not calculated the rental or deficiency rate that it contends applies to Verizon's use of FirstEnergy's poles and/or the rental rate that FirstEnergy contends applies to FirstEnergy's use of Verizon's poles under the Joint Use Agreements, provide all inputs and identify all source data required to calculate the rate. Provide all documents concerning all rate calculations and inputs, including all source data, if they are not publicly available. Separately present the

information for poles owned by Met-Ed, Penelec, Penn Power, and FirstEnergy Pennsylvania.

8. FE PA objects to this request on the grounds that it is overly broad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence.

9. As explained in Section I.A., *supra*, which is incorporated by reference herein, discovery into the West Penn Rate Division is overly broad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence.

C. OBJECTIONS TO VZ TO FE PA SET IV, NO. 3

10. VZ to FE PA Set IV, No. 3 requests the following:

3. For each year beginning with 2011 for Met-Ed, Penelec, and Penn Power, and with 2024 for FirstEnergy Pennsylvania, state whether FirstEnergy did not charge pole attachment rent to any entity with facilities attached to its poles and/or whether FirstEnergy did not collect the full amount of pole attachment rent it invoiced. In answering this question, if FirstEnergy did not charge pole attachment rent and/or did not collect the full amount of pole attachment rent it invoiced, identify the relevant entity and describe for each such entity: (a) whether FirstEnergy did not charge pole attachment rent and/or did not collect the full amount of invoiced pole attachment rent; (b) the rental years for which FirstEnergy did not charge pole attachment rent and/or did not collect the full amount of invoiced pole attachment rent; (c) the amount of pole attachment rent FirstEnergy contends that it did not charge and/or did not collect; (d) the reason why FirstEnergy did not charge and/or collect pole attachment rent; (e) how FirstEnergy treated the unbilled or uncollected revenue in a base rate proceeding filed by FirstEnergy under 66 Pa.C.S. § 1308(d), and (f) the docket number for the base rate proceeding. Identify and provide all non-privileged documents concerning FirstEnergy's treatment of the unbilled or uncollected revenue in a base rate proceeding. Separately present the information for poles owned by Met-Ed, Penelec, Penn Power, and FirstEnergy Pennsylvania, if possible.

11. FE PA objects to this request on the grounds that it is overly broad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence.

12. As explained in Section I.A., *supra*, which is incorporated by reference herein, discovery into the West Penn Rate Division is overly broad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence.

13. Also, this request is overly broad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence due to its expansive temporal scope.

14. Verizon's discovery request would require FE PA to review an extensive amount of records and documents for all the attachers to its facilities for the Met-Ed, Penelec, and Penn Power Rate Divisions for the past 15 years, and then compile such information in the manner requested by Verizon.

15. Consequently, due to the expansive temporal scope of this request and the amount of records implicated by it, the request is overly broad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence.

D. OBJECTIONS TO VZ TO FE PA SET IV, NO. 4

16. VZ to FE PA Set IV, No. 4 requests the following:

4. Identify and provide all non-privileged documents concerning FirstEnergy's view of the potential impact of this Litigation, including the potential impact of the relief sought by this Litigation, on the rates FirstEnergy charges its customers, and all documents concerning or reflecting the position taken by any other entity, including the Bureau of Investigation and Enforcement ("I&E") of the Pennsylvania Public Utility Commission and the Office of Consumer Advocate ("OCA"), concerning the potential impact of this Litigation, including the potential impact of the relief sought by this Litigation, on the rates FirstEnergy charges its customers. Include with your response unredacted copies of all documents related to Pennsylvania Public Utility Commission docket R-2024-3047068 that reference this Litigation, including all filings made and all documents issued, exchanged, or produced by any entity, including FirstEnergy. Separately present the information for poles owned by Met-Ed, Penelec, Penn Power, and FirstEnergy Pennsylvania, if possible.

17. FE PA objects to this request on the grounds that it is overly broad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence.

18. All the public filings, testimony, and exhibits that were submitted in FE PA's 2024 Rate Case at Docket No. R-2024-3047068 are publicly available on the Commission's online docket for the proceeding at <https://www.puc.pa.gov/docket/R-2024-3047068>.

19. FE PA objects to the extent that this request would require the Company to assemble and produce any of the documents that are publicly available at that docket.

20. Verizon is more than capable of filtering through those documents and identifying which of those fall within the scope of its request.

21. Furthermore, the unredacted copies of any filings and testimony, as well as any discovery responses and any documents exchanged in discovery, were the subject of a Protective Order issued on August 15, 2024, in that case.

22. As those materials were the subject of a Protective Order issued in that proceeding, a Protective Order must be entered in this case before the Company can produce such materials.

E. OBJECTIONS TO VZ TO FE PA SET IV, NO. 6

23. VZ to FE PA Set IV, No. 6 requests the following:

6. To the extent not previously produced, for each year beginning with 2009 for Met-Ed and Penelec, for each year beginning with 1999 for Penn Power, and for each year beginning with 2024 for FirstEnergy Pennsylvania, identify all entities that had a Pole Attachment Agreement with FirstEnergy and state whether the entity was an ILEC, CLEC, cable company, wireless provider, or other entity. For each entity and each year, describe in detail the pole attachment rent collected from the entity, including whether rent was calculated as a lump sum amount, a net rental amount, a gross rental amount, a deficiency amount, using rental rates, and/or in some other manner. In answering this question, provide (a) the manner for calculating the pole attachment revenue, (b) the rate and/or amount that FirstEnergy charged the entity, (c) the rate and/or amount that FirstEnergy collected from the entity, if different, (d) the number of poles and/or attachments for which pole attachment rent was

charged, (e) the total gross rental amount FirstEnergy collected from the entity and, if applicable, (f) the rate and/or amount that applied to FirstEnergy's use of the entity's poles, (g) the number of the entity's poles used by FirstEnergy, and (h) the total net rental amount collected from the entity. Provide all documents concerning FirstEnergy's response to this Request, including all source data and workpapers. Separately present the information for poles owned by Met-Ed, Penelec, Penn Power, and FirstEnergy Pennsylvania.

24. FE PA objects to this request on the grounds that it is overly broad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence.

25. As explained in Section I.A., *supra*, which is incorporated by reference herein, discovery into the West Penn Rate Division is overly broad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence.

26. Additionally, this request is overly broad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence due to its expansive temporal scope.

27. Verizon's request would require FE PA to compile extensive information and documents for every year going back 27 years for the Penn Power Rate Division and 17 years for the Met-Ed and Penelec Rate Divisions.

28. Information and documents dating back decades for any "Pole Attachment Agreement with FirstEnergy" and any "ILEC, CLEC, cable company, wireless provider, or other entity" is not relevant to the matters in dispute, nor is it reasonably calculated to lead to the discovery of admissible evidence.

29. Finally, FE PA notes that information and documents requested in this discovery request are confidential and competitively-sensitive.

30. The Company reserves the right to seek a Protective Order to protect against the unwarranted public disclosure of such information and documents should this request be permitted in full or in part.

F. OBJECTIONS TO VZ TO FE PA SET IV, NO. 7

31. VZ to FE PA Set IV, No. 7 requests the following:

7. For each year beginning with 2020 for Met-Ed, Penelec, and Penn Power, and each year beginning with 2024 for FirstEnergy Pennsylvania, describe in detail the method or formula FirstEnergy used to calculate the pole attachment rate(s) it charged cable companies and CLECs. For each pole attachment rate charged, provide FirstEnergy's calculation of the rate and identify all inputs, assumptions, and source data, the person(s) who calculated the rate, and the date the rate was calculated. To the extent that a rate identified in response to this Request differs from the rate identified in response to Request 1 for the same pole owner and same year, describe in detail the reason for the difference. Provide all documents concerning all calculations and inputs, including all source data, if they are not publicly available. Separately present the information for poles owned by Met-Ed, Penelec, Penn Power, and FirstEnergy Pennsylvania.

32. FE PA objects to this request on the grounds that it is overly broad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence.

33. As explained in Section I.A., *supra*, which is incorporated by reference herein, discovery into the West Penn Rate Division is overly broad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence.

34. The Company also reserves the right to seek a Protective Order to protect against the unwarranted public disclosure of any confidential or competitively-sensitive information and documents should this request be permitted in full or in part.

G. OBJECTIONS TO VZ TO FE PA SET IV, NO. 8

35. VZ to FE PA Set IV, No. 8 requests the following:

8. For each year beginning with 2020 for Met-Ed, Penelec, and Penn Power, and each year beginning with 2024 for FirstEnergy Pennsylvania, provide FirstEnergy's state-authorized weighted average cost of capital and/or weighted cost of equity, FirstEnergy's cost of debt, FirstEnergy's cost of equity, and FirstEnergy's capital structure. Identify in your response the formula, calculations, inputs, assumptions, and source data used to determine FirstEnergy's state-

authorized weighted average cost of capital and/or weighted cost of equity, FirstEnergy's cost of debt, FirstEnergy's cost of equity, and FirstEnergy's capital structure. Separately present the information for poles owned by Met-Ed, Penelec, Penn Power, and FirstEnergy Pennsylvania.

36. FE PA objects to this request on the grounds that it calls for a special study or analysis and is overly broad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence.

37. As explained in Section I.A., *supra*, which is incorporated by reference herein, discovery into the West Penn Rate Division is overly broad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence.

38. Additionally, this is a complaint proceeding, not a rate proceeding.

39. As such, discovery cannot be used to require the answering party to conduct a special study or analysis. *See* 52 Pa. Code § 5.361(b).

40. Therefore, FE PA objects to the extent that the request calls for the Company to perform a special study or analysis.

H. OBJECTIONS TO VZ TO FE PA SET IV, NO. 11

41. VZ to FE PA Set IV, No. 11 requests the following:

11. For each year beginning with 2019 for Met-Ed, Penelec, and Penn Power, and each year beginning with 2024 for FirstEnergy Pennsylvania, identify the rate for a communications provider's use of one foot of space on (a) Met-Ed's poles, (b) Penelec's poles, (c) Penn Power's poles, and (d) FirstEnergy Pennsylvania's poles using the formula " $RR = E + ROR(RB)$ " that is referenced on page 42 of FirstEnergy's Initial Brief. For each rate, provide FirstEnergy's calculation of the rate and identify all inputs, assumptions, and source data used to calculate the rate, the person(s) who calculated the rate, and the date the rate was calculated. If FirstEnergy has not calculated a rate using the formula " $RR = E + ROR(RB)$," identify all inputs and source data required to calculate the rate. Provide all documents concerning the calculations and inputs, including all source data, if they are not publicly available. Separately present the

information for poles owned by Met-Ed, Penelec, Penn Power, and FirstEnergy Pennsylvania.

42. FE PA objects to this request on the grounds that it calls for a special study or analysis and is overly broad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence.

43. As explained in Section I.A., *supra*, which is incorporated by reference herein, discovery into the West Penn Rate Division is overly broad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence.

44. Furthermore, this is a complaint proceeding, not a rate proceeding.

45. As such, discovery cannot be used to require the answering party to conduct a special study or analysis. *See* 52 Pa. Code § 5.361(b).

46. Therefore, FE PA objects to the extent that the request calls for the Company to perform a special study or analysis.

I. OBJECTIONS TO VZ TO FE PA SET IV, NO. 12

47. VZ to FE PA Set IV, No. 12 requests the following:

12. To the extent not previously produced, provide FirstEnergy's Pole Attachment Agreements.

48. FE PA objects to this request on the grounds that it is overly broad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence.

49. As defined in the Instructions accompanying VZ to FE PA Set IV, "Pole Attachment Agreements" means "an agreement between FirstEnergy and any entity for use of space on FirstEnergy's poles and includes, without limitations, Joint Use Agreements and License Agreements."

50. This remand proceeding is limited in scope to the Joint Use Agreements in place between Verizon and FE PA's Met-Ed, Penelec, and Penn Power Rate Divisions and the rates under those agreements.

51. An inquiry into and production of every "Pole Attachment Agreement" for FE PA is far beyond the scope of this proceeding.

52. In fact, the request encompasses any agreement governing the attachment of facilities to FE PA's poles, including those entities that are not similarly-situated to Verizon, which is an Incumbent Local Exchange Carrier ("ILEC").

53. Furthermore, as explained in Section I.A., *supra*, which is incorporated by reference herein, discovery into the West Penn Rate Division is overly broad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence.

54. The Company also reserves the right to seek a Protective Order to protect against the unwarranted public disclosure of any confidential or competitively-sensitive information and documents should this request be permitted in full or in part.

J. OBJECTIONS TO VZ TO FE PA SET IV, NO. 14

55. VZ to FE PA Set IV, No. 14 requests the following:

14. State each and every instance since 2009 in which FirstEnergy was expressly required by the Public Utility Commission to refund amounts to any entity. Describe in detail each such refund, including (a) the docket number in which the refund was required; (b) how much FirstEnergy was required to refund, why, to, whom, and when; (c) whether, and if so, when and by how much FirstEnergy sought to increase the rates it charges its electric customers on a gross and per-customer basis because of the refund; and (d) whether and, if so, what increase to the rates FirstEnergy charges its electric customers was authorized by the Public Utility Commission and the impact of that increase on a per-customer basis. Identify and provide all filings at the Commission that reference the refund and/or a rate increase authorized by the Public Utility Commission because of the refund. Separately present the information for poles owned by Met-Ed, Penelec, Penn Power, and FirstEnergy Pennsylvania, if possible.

56. FE PA objects to this request on the grounds that it is overly broad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence.

57. As explained in Section I.A., *supra*, which is incorporated by reference herein, discovery into the West Penn Rate Division is overly broad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence.

58. In addition, Verizon's request asks for extensive information, stretching back over 17 years, for "each and every instance . . . in which FirstEnergy was expressly required by the Public Utility Commission to refund amounts to any entity."

59. As written, Verizon's request would encompass any Commission proceeding, including *pro se* customer complaints, where FE PA was directed to issue a refund to an entity.

60. Such refunds have no bearing on the instant proceeding, which involves pole attachment agreements and rates.

61. Nevertheless, FE PA would be willing answer this request if the scope were limited to the past 10 years and to refunds involving pole attachment rates.

K. OBJECTIONS TO VZ TO FE PA SET IV, NO. 16

62. VZ to FE PA Set IV, No. 16 requests the following:

16. Identify and provide all documents, workpapers, reports, and analyses FirstEnergy's Supplemental Witnesses consider or rely upon in preparing Supplemental Testimony.

63. FE PA objects to this request to the extent that it seeks privileged information and materials, asks for drafts of testimony and exhibits, and seeks disclosure of facts and opinions held by expert witnesses prior to the service of their direct testimony in accordance with the litigation schedule.

64. First, FE PA objects to the extent that the request asks for information and materials that are privileged, including those information and materials that are protected by the attorney-client privilege and attorney work product doctrine.

65. Matters that are privileged are shielded from discovery by the Commission's regulations. *See* 52 Pa. Code §§ 5.321(c), 5.361(a).

66. Further, Section 5.323(a) of the Commission's regulations states, "The discovery may not include disclosure of the mental impressions of a party's attorney or his conclusions, opinions, memoranda, notes, summaries, legal research or legal theories." 52 Pa. Code § 5.323(a).

67. Section 5.323(a) also provides, in pertinent part, that "[w]ith respect to the representative of a party other than the party's attorney, discovery may not include disclosure of his mental impressions, conclusions or opinions respecting the value or merit of a claim or defense or respecting strategy, tactics or preliminary or draft versions of written testimony or exhibits, whether or not final versions of the testimony or exhibits are offered into evidence." *Id.*

68. Thus, discovery is not permitted into legal opinions of the Company's attorneys that are protected by attorney-client privilege and the attorney work product doctrine, nor the mental impressions, conclusions, or opinions of a non-attorney representative of a party's mental impressions, conclusions, or opinions about a claim or defense or regarding strategy or tactics.

69. Second, FE PA objects to the extent that the request seeks any drafts of testimony or exhibits.

70. As noted previously, Section 5.323(a) of the Commission's regulations prohibits the discovery of such materials, stating, "[w]ith respect to the representative of a party other than the party's attorney, discovery may not include . . . preliminary or draft versions of written

testimony or exhibits, whether or not final versions of the testimony or exhibits are offered into evidence.” 52 Pa. Code § 5.323(a).

71. Third, FE PA objects to the extent that the request would require the disclosure of facts and opinions held by expert witnesses prior to the service of their direct testimony in accordance with the litigation schedule.

72. Section 5.324(a)(1)(ii) of the Commission’s regulations states “[t]hat the other party have each expert so identified state the substance of the facts and opinions to which the expert is expected to testify and a summary of the grounds for each opinion,” that “[t]he party answering the interrogatories may file as the answer a report of the expert, have the interrogatories answered by the expert or provide written direct testimony of the expert,” and that “[t]he answer, separate report or testimony shall be signed by the expert and shall be deemed to be provided under oath in accordance with section 333(d) of the act (relating to prehearing procedures).

73. However, the timing of the disclosure of such experts’ facts and opinions is limited by Section 5.324(a)(2) of the Commission’s regulations, which provides:

If the party against whom discovery is sought, under paragraph (1)(ii), responds by the filing of written direct testimony, the response shall be considered timely, regardless of § 5.342 (relating to answers or objections to written interrogatories by a party), if the written direct testimony is served on all parties at least 20 days prior to the date on which the expert is scheduled to testify or in accordance with the schedule for the submission of written testimony established by the presiding officer.

Id. § 5.342(a)(2).

74. Under the litigation schedule in this case on remand, FE PA’s written supplemental direct testimony is not due until July 17, 2026.

75. That deadline is at least 20 days before the first day of evidentiary hearings on August 19, 2026.

76. Yet, as written, Verizon's request would force FE PA to disclose the facts and opinions of its experts well before that deadline.

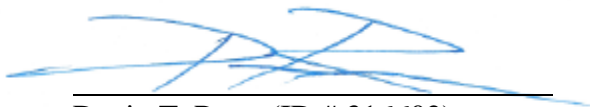
77. Thus, FE PA objects to the extent that this discovery request would require the Company to disclose the facts and opinions held by its expert witnesses before the service of its written supplemental direct testimony on July 17, 2026.

78. For these reasons, FE PA objects to VZ to FE PA Set IV, Nos. 1-4, 6-8, 11-12, 14, and 16 on the grounds that one or more of these requests call for a special study or analysis, are overly broad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence, seek privileged information and materials, ask for drafts of testimony and exhibits, and seek disclosure of facts and opinions held by expert witnesses prior to the service of their direct testimony in accordance with the litigation schedule.

II. CONCLUSION

WHEREFORE, FirstEnergy Pennsylvania Electric Company respectfully objects to VZ to FE PA Set IV, Nos. 1-4, 6-8, 11-12, 14, and 16, as one or more of these requests call for a special study or analysis, are overly broad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence, seek privileged information and materials, ask for drafts of testimony and exhibits, and seek disclosure of facts and opinions held by expert witnesses prior to the service of their direct testimony in accordance with the litigation schedule. Moreover, FirstEnergy Pennsylvania Electric Company reserves the right to object to future interrogatories, requests for admissions, and requests for production of documents, including any instructions and definitions contained therein.

Respectfully submitted,



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Dated: April 20, 2026

*Counsel for FirstEnergy Pennsylvania Electric Company,
f/k/a Metropolitan Edison Company, Pennsylvania Electric
Company, and Pennsylvania Power Company*