

121 Redners Way  
Leesport PA 19533



Office: 610-798-3042  
www.infinicap.com

Secretary  
Pennsylvania Public Utility Commission  
400 North Street  
Commonwealth Keystone Building  
Harrisburg, PA 17120

RE FirstEnergy Pennsylvania Electric Company Default Service Plan  
Docket No. P-2026-3060298

April 6, 2026

Dear Secretary,

I am writing in strong opposition to the proposed Default Service Plan and rate changes.

I own a small, family-run business with four employees. Over the past eight years, we have invested approximately \$4.7 million in solar generation on our facilities. Our systems now produce enough electricity annually to supply approximately 150 households with clean energy.

The proposal's requirement that non-residential customers with demand or MRPL at or above 100 kW be placed into the Hourly Pricing Default Service rate structure would directly impact our business. Under this structure, our compensation would effectively decline from the current price-to-compare of approximately \$0.11/kWh to roughly \$0.03/kWh, reducing our solar revenue by approximately \$175,000 annually. The remaining revenue would not be sufficient to provide a reasonable return or support the financing obligations we incurred to install these systems.

This is a drastic policy shift that places small Pennsylvania businesses and farms in a very difficult position. A 100 kW system is not large, and this threshold would capture a wide range of ordinary commercial operations and agricultural producers, not just large-scale energy developers. As a result, many small businesses that invested in distributed generation in good faith would be disproportionately impacted.

**FirstEnergy's proposal presents an incomplete picture and fails to account for the full value of distributed, clean energy in their rate proposal.**

- Currently, Met-Ed sells the electricity we produce to nearby customers at full retail rates, including distribution charges, while paying us only the generation portion. This allows the utility to collect full distribution revenue on electricity that, in many cases, travels only a short distance to neighboring customers, providing the utility a significant advantage.
- Under the current system, FirstEnergy retains a substantial financial advantage through the timing of cash flows. The company collects full retail revenue from customers immediately—including both generation and distribution charges—while compensation to solar generators is delayed by 12 to 18 months. This effectively provides FirstEnergy with interest-free use of those funds, a meaningful economic benefit that is not acknowledged or accounted for in this proposal.

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- Locally produced electricity delivers clear and measurable system and societal benefits that are not reflected in the proposed rate structure. Power generated and consumed nearby reduces the need for long-distance transmission, lowers grid congestion, and improves overall reliability. At the same time, clean, distributed solar generation provides broader value by reducing emissions, strengthening grid resilience, diversifying energy supply, and supporting local energy independence—outcomes that were central to the intent of the AEPS Act.
- Treating this locally produced, clean energy the same as power generated by distant fossil fuel plants ignores these fundamental differences in value. It is not an equivalent comparison. Much like locally grown food offers greater freshness and lower transportation costs than imported alternatives, locally generated electricity provides greater practical and economic value that should be recognized in rate design.

By forcing distributed generators into a wholesale pricing structure, this proposal is an end run around the intent of the AEPS Act, which was designed to encourage and expand clean, distributed energy. Instead, it discourages investment, reduces compensation, and undermines the long-term benefits of a more resilient, locally supported grid.

**If this rate structure is approved, many small Pennsylvania businesses and farmers will struggle to repay the financing they undertook to develop energy resources for their communities. These investments were made in good faith under an established regulatory framework, and the proposed changes risk shifting the economic burden onto farmers and small businesses while disproportionately benefiting the utility.**

**If changes to the AEPS framework are necessary, they should be addressed through a transparent, collaborative legislative process that considers all stakeholders. Attempting to achieve the same outcome through rate design—effectively reducing compensation by 70–80%—circumvents that process and fails to fully evaluate the broader impacts.**

A core function of the Commission is to ensure that monopoly utilities operate in the public interest and do not exercise their position in a way that creates undue advantage. This proposal raises serious concerns in that regard, as it shifts economic benefit toward the utility while placing disproportionate burden on customer-generators. I respectfully request that the Commission reject or revise these provisions to ensure fair and consistent compensation that reflects the true value of distributed generation.

Thank you for your consideration.

A handwritten signature in black ink, reading "Cleon Swartzentruber". The signature is fluid and cursive, with a large, sweeping flourish at the end.

Cleon Swartzentruber, CEO  
Infinity Capital, LLC

**To file written Comments - complete this form. (please type or print legibly in ink).**

**Application Docket Number:** A- P-2026-3060298

**Protestant Information**

**Provide your name, mailing address, county, and telephone numbers.**

**Name** Infinity Capital LLC

**Street/P.O. Box** 121 Redners Way **Apt #** \_\_\_\_\_

**City** Leesport **State** PA **Zip** 19533

**County** Berks

**Telephone Number(s) Where We Can Contact You During the Day:**

( 610 ) 798-3042 (home) ( \_\_\_\_\_ ) (mobile)

**E-mail Address (optional):** info@infinicap.com

**Please state your comments about this Application. You may use additional paper and attach to this form.**

Re: Petition of FirstEnergy Pennsylvania Electric Company (Met-Ed) for Approval of Its Default Service Program for the Period June 1, 2027 to May 31, 2031

Please see the attached document outlining our opposition to the proposed Default Service Plan and associated rate changes, particularly as they relate to the treatment of distributed solar generation and the impact on small Pennsylvania businesses.

Cleon Swartzentruber (Print your name)

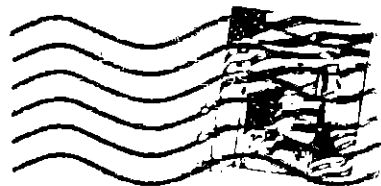
  
(Original Signature)

4/6/2026  
(Date)

**Infinity Capital, LLC**  
121 Redner's Way  
Leesport PA 19533

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**Pennsylvania Public Utilities Commission**  
**400 North Street**  
**Commonwealth Keystone Building**  
**Harrisburg, PA 17210**

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