

May 26, 2026

Via Electronic Filing

Matthew Homsher, Esquire
Secretary
PA Public Utility Commission
P.O. Box 3265
Harrisburg, PA 17105-3265

**Re: Docket No. F-2025-3058151
Craig Moss v. FE PA (Met-Ed Rate District)
Answer to Motion to Compel**

Dear Secretary Homsher:

Attached for filing is the Answer of FirstEnergy Pennsylvania Electric Company (Met-Ed Rate District) to Complainant's Motion to Compel Discovery Requests.

A copy of the attached Answer to Complainant's Motion has been provided to the relevant parties in the manner indicated on the attached Certificate of Service.

If there are any questions, please do not hesitate to contact me.

Very truly yours,

Reger Rizzo & Darnall LLP



Margaret A. Morris

MAM/co
Enclosures

cc: The Hon. Chad L. Allensworth, PA Public Utility Commission [w/encls.]
Tori Giesler, Esquire, FirstEnergy Service Company [w/encls.]
Craig Moss [w/encls.]

**Re: Docket No. F-2025-3058151
Craig Moss v. FE PA (Met-Ed Rate District)
Answer to Motion to Compel**


CERTIFICATE OF SERVICE

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

Via Electronic Mail

Craig Moss
mossraig114@gmail.com

Dated: May 26, 2026



Margaret A. Morris, Esquire

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

CRAIG MOSS	:	
	:	
v.	:	Docket No. F-2025-3058151
	:	
FIRSTENERGY PENNSYLVANIA	:	
ELECTRIC COMPANY	:	

**ANSWER OF FIRSTENERGY PENNSYLVANIA ELECTRIC COMPANY
TO COMPLAINANT’S MOTION TO COMPEL**

FirstEnergy Pennsylvania Electric Company, Met-Ed Rate District (Respondent, FE PA, or Company), by and through its attorneys, Reger Rizzo & Darnall LLP, pursuant to 52 Pa. Code § 5.342(g), hereby submits the following Answer to the Motion to Compel Discovery (Motion) filed by Craig Moss (Complainant). As explained herein, the Honorable Chad L. Allensworth (Judge Allensworth) should deny the Motion on the basis of its procedural deficiencies. In support thereof, the Company states as follows:

I. INTRODUCTION

1. On Sunday, April 19, 2026, at 5:36 PM, the Complainant emailed his First Set of Interrogatories and Requests for the Production of Documents (Discovery Requests) on FE PA. The Certificate of Service was dated April 19, 2026 and stated that the Discovery Requests was served *via* email and 1st Class Mail. A copy of the Discovery Requests is provided as Attachment 1.

2. The Complainant did not file the Certificate of Service that was attached to the Discovery Request as required by Commission regulations at 52 Pa. Code § 5.341(b).

3. The undersigned counsel checked the Commission's website each day looking to see if the Certificate of Service for the Discovery Request had been filed. As of May 10, 2026, it had not been filed. As a result, the Respondent did not consider the document as a properly propounded Discovery Request.

4. On Saturday, May 16, 2026, the Complainant emailed his Motion to compel full and complete answers to Discovery Requests to Judge Allensworth and the undersigned counsel. The Notice to Plead attached to the Motion was dated May 14, 2026. The Motion was dated May 17, 2026. The Certificate of Service for the Motion, dated May 17, 2026, stated that the Motion was served on the Company *via* email on May 17, 2026.

5. On May 20, 2026, the Certificate of Service relating to Complainant's Discovery Requests posted to the docket. The Certificate of Service, dated April 20, 2026, and marked received on April 24, 2026, stated the Discovery Requests was served on the Company *via* email and FedEx 2 Day Delivery. A copy of the Complainant's late-filed Certificate of Service is provided as Attachment 2.

II. MOTION AND RESPONSE

6. The Motion is premature. The Respondent avers that it is obligated to respond **only** to properly propounded discovery.

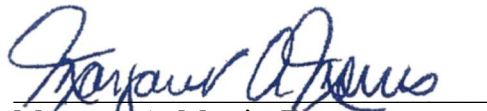
7. The Certificates of Service associated with the Discovery Requests reflect that the Complainant did not serve the documents as stated in the respective Certificate of Service and as required by Commission regulations at 52 Pa Code § 1.57.

8. The Company specifically avers it is not proper to grant the Motion since the Respondent had no obligation to respond to Informal Discovery, consistent with 52 Pa. Code § 5.322.

9. The Complainant did not properly propound his Discovery Requests and as such, he is not entitled to compel said responses.

WHEREFORE, FirstEnergy Pennsylvania Electric Company, respectfully requests that the Honorable Chad L. Allensworth deny the Motion to Compel Discovery filed by Craig Moss in its entirety.

Respectfully submitted,



Margaret A. Morris, Esq.

Attorney ID No. 75048

Reger Rizzo & Darnall LLP

Cira Centre, 13th Floor

2929 Arch Street

Philadelphia, PA 19104

(215) 495-6524 tel.

mmorris@regerlaw.com

*Counsel for FirstEnergy Pennsylvania Electric
Company (Met-Ed Rate District)*

Date: May 26, 2026

Docket No. F-2025-3058151
Craig Moss v. FirstEnergy Pennsylvania Electric Company
(Met-Ed Rate District)

Attachment 1

First Set of Interrogatories and Requests for Production of Documents

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

CRAIG MOSS, Complainant,

v. **FIRSTENERGY ELECTRIC COMPANY,** : **Docket No. F-2025-3058151**
Respondent. :

COMPLAINANT'S FIRST SET OF INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS DIRECTED TO RESPONDENT

Pursuant to the provisions of 52 Pa. Code § 5.341 and § 5.349, Complainant, Craig Moss, hereby propounds the following Interrogatories and Requests for Production of Documents to Respondent, FirstEnergy Pennsylvania Electric Company, to be answered fully and under oath or affirmation, and to produce the requested documents within twenty (20) days of service hereof.

DEFINITIONS AND INSTRUCTIONS

A. "Respondent" means FirstEnergy Pennsylvania Electric Company, its employees, agents, representatives, attorneys, and any other person acting on its behalf. **B. "Service Address"** refers to the property located at 180 Asbury Court, Mount Wolf, PA 17347. **C. "Relevant Period"** refers to the time frame from January 1, 2017, through June 30, 2024. **D. "Document"** shall have the broadest meaning permissible under the rules of discovery, including but not limited to written notes, customer service logs, computer database entries, emails, text messages, audio recordings, applications, and billing statements.

REQUESTS FOR PRODUCTION OF DOCUMENTS

(Pursuant to 52 Pa. Code § 5.349)

REQUEST NO. 1: Produce any and all account notes, call logs, customer service records, internal memoranda, emails, text messages, and written correspondence associated with the Service Address during the Relevant Period.

REQUEST NO. 2: Produce any audio recordings, transcripts, or internal system notes specifically related to any communication on or about January 26, 2017, involving Tara Moss or any caller identifying themselves as residing at or managing the Service Address at 180 Asbury Court, Mount Wolf, PA 17347.

REQUEST NO. 3: Produce any and all audio recordings, transcripts, or internal system notes of any phone call Respondent alleges was made by Craig Moss in or around 2022 wherein he allegedly requested that the utility bill remain in his name.

REQUEST NO. 4: Produce all documents relating to any Customer Assistance Program (PCAP) arrangements, applications, approvals, or denials submitted by or on behalf of Tara Moss for the Service Address during the Relevant Period.

REQUEST NO. 5: Produce a complete accounting of all payment methods used to satisfy the account balance for the Service Address during the Relevant Period, including the name on the payment instrument (e.g., name on a checking account or credit card).

REQUEST NO. 6: Produce all records of any payments made to the account for the Service Address by the Pennsylvania Department of Human Services (formerly the Department of Public Welfare), or any other state or local assistance program, on behalf of Tara Moss.

REQUEST NO. 7: Produce copies of all final billing statements or notices of termination generated for the Service Address showing the outstanding balance and the name or names of the individuals listed as the billed party.

INTERROGATORIES

(Pursuant to 52 Pa. Code § 5.341)

INTERROGATORY NO. 1: State whether Respondent's internal records or customer service logs indicate any contact from Tara Moss regarding the Service Address on or around January 26, 2017. If so, detail the exact substance of that communication, including whether the caller informed Respondent that Craig Moss was incarcerated or otherwise not residing at the property.

INTERROGATORY NO. 2: Identify the name and employee identification number of the Respondent's representative who fielded the January 26, 2017, phone call referenced in Interrogatory No. 1.

INTERROGATORY NO. 3: State whether Respondent alleges that Craig Moss contacted the company at any point in 2022 to request that the account for the Service Address remain in his name. If the answer is in the affirmative, provide the exact date and time of the call, identify the representative who took the call, state whether an audio recording of this interaction exists, and state what phone number the call was made from.

INTERROGATORY NO. 4: Detail any and all instances during the Relevant Period where a request was made by any party to change the name on the account for the Service Address. For each instance, state who made the request, the date of the request, and the Respondent's internal reasoning for why the request was either processed or denied.

INTERROGATORY NO. 5: Identify by name, title, and business address every individual who assisted in the preparation of the answers to these Interrogatories and the collection of the requested Documents.

INTERROGATORY NO. 6: Detail any and all instances during the Relevant Period (January 1, 2017, through June 30, 2024) of any calls made by Tara Moss about the electricity at 180 Asbury Court, Mount Wolf, PA 17347.

Dated: April 19, 2026

Respectfully Submitted,



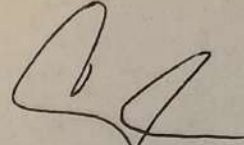
Craig Moss, *Pro Se*
P.O. Box 299 Mount Wolf, PA 17347
(717) 758-5456
mosscraig114@gmail.com

CERTIFICATE OF SERVICE

I, Craig Moss, hereby certify that I caused to be served a true and correct copy of the foregoing Complainant's First Set of Interrogatories and Requests for Production of Documents by emailing and sending by 1st class mail the foregoing to the person indicated below:

Margaret A. Morris, Esq. Cira Center, 13th Floor 2929 Arch St. Philadelphia, PA 19104 mmorris@regerlaw.com

Dated: April 19, 2026



Craig Moss, *Pro Se*
P.O. Box 299 Mount Wolf, PA 17347
(717) 758-5456
mosscraig114@gmail.com

Docket No. F-2025-3058151
Craig Moss v. FirstEnergy Pennsylvania Electric Company
(Met-Ed Rate District)

Attachment 2

Certificate of Service

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

CRAIG MOSS, Complainant,

v. : **Docket No. F-2025-3058151**
FIRSTENERGY ELECTRIC COMPANY,
Respondent. :

CERTIFICATE OF SERVICE

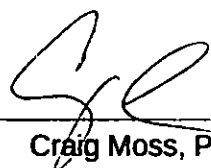
I, Craig Moss, hereby certify that I have this day served a true and correct copy of the foregoing Complainant's First Set of Interrogatories and Requests for Production of Documents upon the party listed below, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a party).

Served via Electronic Mail and FedEx 2Day Express:

Margaret A. Morris, Esquire
Reger Rizzo & Darnall LLP
Cira Centre, 13th Floor
2929 Arch Street
Philadelphia, PA 19104
mmorris@regerlaw.com

Counsel for Respondent, FirstEnergy Pennsylvania Electric Company

Date: April 20, 2026



Craig Moss, Pro Se

Crazy Moss
P.O. Box 299
Mt. Wolf, Pa 17347

HARRISBURG PA 171
22 APR 2026 PM 1 L



Secret 201
Pennsylvania Public Utility Commission
400 North St
Harrisburg, Pa 17120

17120-007993

