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File #: 180259

June 5, 2026

VIA ELECTRONIC FILING

Matthew L. Homsher, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor North
P.O. Box 3265
Harrisburg, PA 17105-3265

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 Secretary Homsher:

Enclosed for filing is the Motion of FirstEnergy Pennsylvania Electric Company (“FE PA”) to Dismiss Objections and Compel Responses to Interrogatories and Requests for Production of Documents Propounded on Verizon Pennsylvania LLC and Verizon North LLC (collectively, “Verizon”) – Set IV, Nos. 39-42, 50-51, and 53-54 in the above-captioned proceeding.

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

Respectfully submitted,


Devin Ryan

DR/bfc

Enclosures

cc: The Honorable John M. Coogan (*via email; with attachment*)
Certificate of Service

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: June 5, 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	:	

NOTICE TO PLEAD

YOU ARE HEREBY ADVISED THAT PURSUANT TO 52 PA. CODE § 5.342(g)(1) AND PARAGRAPH 7 OF THE SCHEDULING ORDER DATED MARCH 23, 2026, YOU MAY FILE AN ANSWER TO THE ENCLOSED MOTION TO DISMISS OBJECTIONS AND COMPEL RESPONSES WITHIN THREE (3) BUSINESS DAYS AFTER THE DATE OF SERVICE. YOUR REPLY SHOULD BE FILED WITH THE SECRETARY OF THE PENNSYLVANIA PUBLIC UTILITY COMMISSION, P.O. BOX 3265, HARRISBURG, PA 17105-3265. A COPY OF YOUR ANSWER SHOULD ALSO BE SERVED ON THE UNDERSIGNED COUNSEL.

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Dated: June 5, 2026

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

**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	:	

**MOTION OF FIRSTENERGY PENNSYLVANIA ELECTRIC COMPANY TO
DISMISS OBJECTIONS AND COMPEL RESPONSES TO INTERROGATORIES AND
REQUESTS FOR PRODUCTION OF DOCUMENTS PROPOUNDED ON
VERIZON PENNSYLVANIA LLC AND VERIZON NORTH LLC – SET IV, NOS. 39-42,
50-51, AND 53-54**

TO ADMINISTRATIVE LAW JUDGE JOHN M. COOGAN:

Pursuant to 52 Pa. Code §§ 5.342(g) and 5.349(d), FirstEnergy Pennsylvania Electric Company (“FE PA” or the “Company”) hereby files this Motion to Dismiss Objections and Compel Responses to Interrogatories and Requests for Production of Documents Propounded on Verizon Pennsylvania LLC and Verizon North LLC (collectively “Verizon”) – Set IV (“FE PA to VZ Set IV”), Nos. 39-42, 50-51, and 53-54.¹ As described below, FE PA’s discovery requests at issue are relevant to the issues to be decided in this case and are reasonably calculated to lead to the discovery of admissible evidence, and Verizon’s objections to these requests lack merit. In

¹ FE PA notes that Verizon served “General Objections” to the entirety of FE PA to VZ Set IV and served all of its discovery responses subject to and without waiver of its objections. As noted in Section II, *infra*, Verizon’s practice of lodging general objections contravenes the Commission’s rules. FE PA also reserves the right to move to dismiss Verizon’s general and specific objections to discovery requests where Verizon provided responses to those requests.

fact, Verizon has objected to some discovery requests that are essentially the same as those propounded on FE PA and that FE PA was compelled to answer under Administrative Law Judge John M. Coogan’s (“ALJ”) Remand Prehearing Order #2.

In support of its Motion, FE PA states as follows:

I. INTRODUCTION

1. The following procedural history is relevant to the instant Motion to Dismiss Objections and Compel Responses.

2. On May 15, 2026, FE PA served FE PA to VZ Set IV. A true and correct copy of FE PA to VZ Set IV is attached hereto as **Appendix A**.

3. On May 20, 2026, Verizon served its Objections to FE PA to VZ Set IV. A true and correct copy of Verizon’s Objections to FE PA to VZ Set IV is attached hereto as **Appendix**

B.

4. On May 28, 2026, counsel for FE PA and Verizon discussed the discovery dispute and attempted to reach a resolution.

5. On May 29, 2026, FE PA proposed an extension of, and Verizon agreed to extend, the deadline for FE PA’s Motion to Dismiss Objections and Compel Responses to 12:00 PM on June 5, 2026.

II. LEGAL STANDARDS

6. “The commission’s regulation regarding discovery requests allows a broad scope of discovery.” *City of Pittsburgh v. Pa. PUC*, 526 A.2d 1243, 1249 (Pa. Cmwlth. 1987).

7. Under 52 Pa. Code § 5.321I, a party is entitled to obtain discovery of any matter not privileged that is relevant to the pending proceeding, or any matter that is reasonably calculated

to lead to the discovery of admissible evidence. Discovery is permitted regardless of whether the information sought “relates to the claim or defense of the party seeking discovery or to the claim or defense of another party.” *Id.*

8. Consistent with that regulation, the Commission generally provides wide latitude in discovery matters. *See Pa. PUC v. The Peoples Natural Gas Co.*, 62 Pa. P.U.C. 56 (Order Entered Aug. 26, 1986); *Pa. PUC v. Equitable Gas Co.*, 61 Pa. P.U.C. 468 (Order Entered May 16, 1986).

9. An objection to a discovery request must “[r]estate the interrogatory or part thereof deemed objectionable and the specific ground for the objection.” 52 Pa. Code § 5.342(c)(2). Furthermore, the objection must “[i]nclude a description of the facts and circumstances purporting to justify the objection.” 52 Pa. Code § 5.342(c)(3); *see* 52 Pa. Code § 5.350(d)(3) (stating that the “[g]rounds for objections” to a request for admission “must be specifically stated”).

10. Objections to interrogatories must be served within 10 days of the date the discovery was served. 52 Pa. Code § 5.342I. Objecting parties remain under an obligation to provide timely answers to interrogatories or subparts of interrogatories to which they did not object. *Id.* § 5.342(f). Further, objections must be contained in a document separate from an answer. *Id.* § 5.342(c).

11. The party’s objections must “specifically identif[y] the objectionable interrogatories.” 52 Pa. Code § 5.342(c)(1).

12. “The Commission’s discovery rules do not permit general objections or objections by illustration.”²

² *Joint Application of Aqua America Inc., Aqua Pa. Inc., Aqua Pa. Wastewater Inc., and Peoples Natural Gas Co. LLC*, Docket Nos. A-2018-3006061, *et al.*, p. 3 (Interim Order on Equitrans’ Motion to Dismiss Objections to Discovery entered Feb. 19, 2019).

13. As a result, general, non-specific objections are “improper” in Commission proceedings and should be dismissed.³

14. Similarly, the tactic of generally objecting to “every single interrogatory, even the ones to which it is filing a response,” is “highly confusing” and “highly improper” before the Commission.⁴

15. In the Scheduling Order, the ALJ also encouraged the parties to try to resolve discovery disputes themselves before filing motions to compel, stating:

That the parties shall conduct discovery pursuant to 52 Pa.Code §§ 5.321-5.373, as modified above. The parties are encouraged to cooperate and exchange information on an informal basis. The parties shall cooperate rather than engage in numerous or protracted discovery disagreements that require formal resolution. All motions to compel shall contain a certification by counsel setting forth the informal discovery undertaken and their efforts to resolve their discovery disputes informally. If a motion to compel does not contain this certification, the parties will be directed to pursue informal discovery. There are limitations on discovery and sanctions for abuse of the discovery process. 52 Pa.Code §§ 5.361, 5.371-5.372.

Scheduling Order, p. 4.

III. CERTIFICATION OF COUNSEL ON EFFORTS TO RESOLVE DISCOVERY DISPUTE INFORMALLY

16. Prior to filing the instant Motion, FE PA and Verizon tried to resolve the discovery dispute informally.

17. On May 28, 2026, counsel for FE PA and Verizon discussed Verizon’s objections to FE PA to VZ Set IV. FE PA’s counsel provided clarifications on the scope of several discovery requests at issue, explaining the reasoning behind the Company’s discovery, and attempted to

³ *Pa. PUC v. Pa. Am. Water Co.*, 2011 Pa. PUC LEXIS 1523, at *11-12 (Order on Motion to Compel entered July 21, 2011).

⁴ *Id.* at *12.

devise limitations that would help resolve some of Verizon's objections. Verizon's counsel agreed to consider the clarifications, reasoning, and limitations provided by FE PA. Verizon's counsel also confirmed that Verizon would be serving responses to FE PA to VZ Set IV on June 1, 2026.

18. On May 29, 2026, FE PA's counsel emailed Verizon requesting that the deadline for its Motion to Dismiss Objections and Compel Responses be extended until 12:00 PM on June 5, 2026, so that the Company could review Verizon's supplemental direct testimony and exhibits and Verizon's responses to FE PA to VZ Set IV, before deciding whether to pursue a formal Motion to Dismiss Objections and Compel Responses.

19. Later that same day, Verizon's counsel replied that FE PA's proposed extension was acceptable to Verizon.

20. Although FE PA continues to review Verizon's supplemental direct testimony and exhibits and Verizon's responses to FE PA to VZ Set IV, FE PA believes that its efforts working with Verizon have helped narrow the scope of the instant Motion.

21. FE PA also remains willing to work with Verizon to, if possible, resolve informally the objections that are disputed in this Motion.

IV. MOTION TO DISMISS OBJECTIONS AND COMPEL RESPONSES

22. FE PA respectfully requests that the ALJ dismiss Verizon's objections to FE PA to VZ Set IV, Nos. 39-42, 50-51, and 53-54 and compel Verizon to respond to those requests in their entirety.

A. FE PA TO VZ SET IV, NOS. 39-42

23. FE PA to VZ Set IV, Nos. 39-42 request the following:

39. For each year beginning with 2009, please identify all entities that had a Pole Attachment Agreement with Verizon state whether the entity was an electric utility, 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 Verizon charged or was charged by the entity, (c) the rate and/or amount that Verizon collected from or paid to 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 Verizon collected from or paid to the entity and, if applicable, (f) the rate and/or amount that applied to Verizon's or the entity's use of the poles, (g) the number of Verizon's poles used by the entity or the number of the entity's poles used by Verizon, and (h) the total net rental amount collected from or paid to the entity. Provide all non-privileged Documents concerning Verizon's response to this discovery request, including all source data and workpapers. Separately present the information for poles owned by Verizon Pennsylvania and Verizon North.

40. For each year beginning with 2020, please describe in detail the method or formula Verizon used to calculate the pole attachment rate(s) it charged cable companies and CLECs. For each pole attachment rate charged, provide Verizon'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 discovery request differs from the rate identified in response to FE PA to VZ-IV-36 for the same pole owner and same year, describe in detail the reason for the difference. Provide all non-privileged Documents concerning all calculations and inputs, including all source data, if they are not publicly available. Separately present the information for poles owned by Verizon Pennsylvania and Verizon North.

41. Please provide Verizon Pennsylvania's Pole Attachment Agreements.

42. Please provide Verizon North's Pole Attachment Agreements.

24. In addition to its "General Objections," Verizon specifically objected to these requests as follows:

39. Verizon objects to this request because it is overly broad, unduly burdensome and seeks information about pole attachment rates that are not at issue in this proceeding, are not relevant or material to the subject matter of this proceeding, and are not reasonably calculated

to lead to the discovery of admissible evidence about the just and reasonable rate for Verizon's use of FirstEnergy's poles calculated using FirstEnergy's pole costs. Verizon further objects to this request to the extent it seeks competitively sensitive and confidential information about entities that are not a party to this case, not regulated by the Commission and/or whose rates are not the subject of this proceeding or any other pending complaint proceeding before the Commission. ALJ Cheskis held that "discovery is not permitted if it relates to a matter which is privileged and the matter is privileged if it is confidential to another entity." Order at 6 (May 11, 2020). As with FirstEnergy's prior discovery request, the other entities, including other electric utilities, "whose information would be part of the answer" to this request "are not subject to the protective [agreement] in place in this proceeding." *Id.* Verizon also objects to this request to the extent it requires the compilation of data or information that Verizon does not maintain in the format requested or in the normal course of business. Verizon will not respond to this request.

40. Verizon objects to this request because it is overly broad, unduly burdensome and seeks information about pole attachment rates that are not at issue in this proceeding, are not relevant or material to the subject matter of this proceeding, and are not reasonably calculated to lead to the discovery of admissible evidence about the just and reasonable rate for Verizon's use of FirstEnergy's poles calculated using FirstEnergy's pole costs. Verizon will not respond to this request.

41. Verizon objects to this request because it is overly broad, unduly burdensome and seeks information about pole attachment rates that are not at issue in this proceeding, are not relevant or material to the subject matter of this proceeding, and are not reasonably calculated to lead to the discovery of admissible evidence about the just and reasonable rate for Verizon's use of FirstEnergy's poles calculated using FirstEnergy's pole costs. Verizon further objects to this request to the extent it seeks competitively sensitive and confidential information about entities that are not a party to this case, not regulated by the Commission and/or whose rates are not the subject of this proceeding or any other pending complaint proceeding before the Commission. ALJ Cheskis held that "discovery is not permitted if it relates to a matter which is privileged and the matter is privileged if it is confidential to another entity." Order at 6 (May 11, 2020). As with FirstEnergy's prior discovery request, the other companies, including other electric utilities, "whose information would be part of the answer" to this request "are not subject to the protective [agreement] in place in this proceeding." *Id.* Verizon will not respond to this request.

42. Verizon objects to this request because it is overly broad, unduly burdensome and seeks information about pole attachment rates that are not at issue in this proceeding, are not relevant or material to the subject matter of this proceeding, and are not reasonably calculated to lead to the discovery of admissible evidence about the just and reasonable rate for Verizon's use of FirstEnergy's poles calculated using FirstEnergy's pole costs. Verizon further objects to this request to the extent it seeks competitively sensitive and confidential information about entities that are not a party to this case, not regulated by the Commission and/or whose rates are not the subject of this proceeding or any other pending complaint proceeding before the Commission. ALJ Cheskis held that "discovery is not permitted if it relates to a matter which is privileged and the matter is privileged if it is confidential to another entity." Order at 6 (May 11, 2020). As with FirstEnergy's prior discovery request, the other companies, including other electric utilities, "whose information would be part of the answer" to this request "are not subject to the protective [agreement] in place in this proceeding." *Id.* Verizon will not respond to this request.

25. The ALJ should dismiss Verizon's objections to these requests and compel Verizon to answer them.

26. The discovery requests are reasonably calculated to lead to the discovery of admissible evidence and are not overly broad, unduly burdensome, or irrelevant.

27. In fact, Verizon propounded essentially the same discovery requests on FE PA, and FE PA was compelled to answer despite FE PA raising objections that the requests were overly broad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence.

28. Specifically, in VZ to FE PA Set IV, Nos. 6-7 and 12, Verizon requested 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.

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.

...

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

29. The ALJ dismissed FE PA's objections and directed the Company to respond, finding, among other things, "that the information Verizon seeks regarding Pole Attachment Agreements could be relevant to its Complaint" and that "the Commission allows participants wide

latitude in discovery matters, and relevancy in discovery is broader than the standard used for admission of evidence at a hearing.” Remand Prehearing Order #2, pp. 12, 15, 18.

30. As a result, FE PA was forced to produce its responses to these requests, including over 1,200 Pole Attachment Agreements.

31. Now, Verizon asserts that FE PA should be denied responses when essentially the same requests are directed toward Verizon.

32. Verizon’s position is unfounded and should be rejected.

33. Based upon the claims and materials it has provided thus far, Verizon is relying heavily on market comparison to argue that the rates it pays are unjust and unreasonable.

34. If the Commission considers comparison of Verizon to some other entity type to be a reasonable basis upon which to evaluate the reasonableness of a rate, information regarding the rates Verizon pays to or charges other companies for pole space is critically relevant to FE PA’s ability to counter Verizon’s case.

35. Further, this case is not simply about FE PA’s pole attachment rates charged to Verizon.

36. The pole attachment agreements at issue are Joint Use Agreements, under which each of the parties (i.e., Verizon and FE PA) have attachments on each other’s poles that are subject to the agreements.

37. Under each of the Joint Use Agreements, the parties are charged reciprocal rates per pole, which are netted during each invoice period based on the number of poles owned by each party.

38. Any calculation of a refund awarded to Verizon would necessarily need to reflect a recalculation of the rates that FE PA pays to Verizon, as Verizon itself has recognized previously.

See, e.g., December 18, 2020 Order, p. 60 (stating “Verizon argues that the refund amount was calculated using properly calculated new telecom rates for both Verizon’s use of FirstEnergy’s poles and for FirstEnergy’s use of Verizon’s poles”).

39. As such, inquiries into the rates charged by Verizon to attaching entities which are similarly-situated to FE PA are well within bounds.

40. Such discovery could reveal, for example, whether electric distribution companies (“EDCs”) have agreed to charge Verizon the New Telecom Rate and whether Verizon has agreed to charge EDCs the New Telecom Rate.

41. Furthermore, Verizon has maintained that the rates charged by FE PA are unduly discriminatory and that the terms and conditions under the Joint Use Agreements do not materially advantage Verizon against its cable and Competitive Local Exchange Carrier (“CLEC”) competitors.

42. FE PA continues to take the position that Verizon enjoys competitive advantages over its cable and CLEC competitors, including through the terms and conditions in the Joint Use Agreements and through the revenue Verizon receives by virtue of its pole ownership.

43. These discovery requests would shed light on those points, including, for example, whether Verizon subjects attachers to its poles to the same or different rates, terms, and conditions that Verizon claims in this case are unjust, unreasonable, and unduly discriminatory.

44. As for any claims about confidentiality or competitive sensitivity, they should be dismissed out of hand.

45. FE PA produced over 1,200 Pole Attachment Agreements as HIGHLY CONFIDENTIAL INFORMATION subject to the terms of the Stipulated Protective Agreement already in place between Verizon and FE PA, even though many of those Pole Attachment

Agreements are with Verizon's cable and CLEC competitors and with other Incumbent Local Exchange Carriers ("ILECs").

46. Verizon can afford itself of the same protection when producing its own Pole Attachment Agreements and any other information that may be confidential or competitively-sensitive in response to these requests.

47. Also, the ALJ already dealt with this issue when ruling on Verizon's Motion to Compel in Remand Prehearing Order #2, when he found the following with respect to VZ to FE PA Set IV, Nos. 6 and 12: "Parties are also not to withhold information prior to issuance of a protective order if a party agrees to treat information as if it were covered by a protective order, pending issuance of a protective order." Remand Prehearing Order #2, pp. 12, 18.

48. Therefore, as FE PA has agreed to treat the information and materials subject to the Stipulated Protective Agreement as though they were covered by a Protective Order, Verizon cannot withhold its production of these discovery responses on confidentiality or competitively-sensitive grounds.

49. Moreover, Verizon errs in relying on the Order of former Administrative Law Judge Joel H. Cheskis ("ALJ Cheskis") from the initial phase of the litigation.

50. Verizon opened the door for FE PA's discovery into the information and materials in FE PA to VZ Set IV, Nos. 39-42 by propounding essentially the same requests on FE PA and compelling FE PA, through Verizon's Motion to Compel, to respond subject to the terms and conditions of the Stipulated Protective Agreement.

51. Verizon cannot have it both ways: forcing FE PA to disclose its own confidential and competitively-sensitive information and agreements for attachers to its poles, while not disclosing the same to FE PA.

52. Finally, to the extent that Verizon has concerns about the volume of the Pole Attachment Agreements requested, and despite FE PA being forced to produce over 1,200 Pole Attachment Agreements in response to Verizon's discovery request, FE PA would be willing to limit the scope of Nos. 41 and 42 to the Pole Attachment Agreements that Verizon has with any EDCs, cable companies, and CLECs.

B. FE PA TO VZ SET IV, NOS. 50-51 AND 53-54

53. FE PA to VZ Set IV, Nos. 50-51 and 53-54 request the following:

50. From 2015 to present, please identify all Verizon-owned poles carrying FE PA facilities that were replaced by FE PA, for which Verizon fully reimbursed FE PA. In the response, please provide, for each instance, the pole number, the pole location, the date of notification of the incident requiring replacement, and the date of replacement. Please produce all non-privileged Documents relied upon in responding to this request.

51. Please state whether Verizon has installed more than one communications line on any poles subject to its Joint Use Agreements with FE PA and any of FE PA's predecessors since 2015. If so, please provide, for each instance, the pole number, pole location, and the year the additional communication line(s) were installed. Please produce all non-privileged Documents relied upon in responding to this request. Verizon will not respond to this request.

...

53. Please state whether Verizon still utilizes any copper wire facilities on FE PA-owned poles subject to Verizon's Joint Use Agreements with FE PA. Please produce all non-privileged Documents relied upon in responding to this request.

54. Please state whether Verizon has deployed new or duplicative (non-replacement) facilities on FE PA-owned poles subject to Verizon's FE PA ILEC agreements since 2015. If so, please provide, for each instance, the pole number, pole location, the year the additional facility or facilities were installed, and any associated make-ready costs paid by Verizon in conjunction with the installation of such facility or facilities. Please produce all non-privileged Documents relied upon in responding to this request.

54. In addition to its “General Objections,” Verizon objected to these requests as follows:

50. Verizon objects to this request because it is overly broad, unduly burdensome and seeks information about Verizon’s poles that is not relevant or material to the subject matter of this proceeding, and not reasonably calculated to lead to the discovery of admissible evidence about the just and reasonable rate for Verizon’s use of FirstEnergy’s poles calculated using FirstEnergy’s pole costs under ten joint use agreements. Verizon further objects to this request to the request to the extent it requests information already in FirstEnergy’s possession and because it requires the compilation of data or information that Verizon does not maintain in the format requested or in the normal course of business and Verizon is not required under the Commission’s discovery rules to make a special study or analysis to attempt to compile this information. Verizon will not respond to this request.

51. Verizon objects to this request because it is vague and ambiguous, “Joint Use Agreements” is an undefined term, and it is unclear which joint use agreements this request refers to. Verizon also objects to this request because it is overly broad, unduly burdensome and seeks information that is not relevant or material to the subject matter of this proceeding, and not reasonably calculated to lead to the discovery of admissible evidence about the just and reasonable rate for Verizon’s use of FirstEnergy’s poles under ten joint use agreements. Verizon further objects to this request to the request to the extent it requests information already in FirstEnergy’s possession and because it requires the compilation of data or information that Verizon does not maintain in the format requested or in the normal course of business and Verizon is not required under the Commission’s discovery rules to make a special study or analysis to attempt to compile this information. Verizon will not respond to this request.

...

53. Verizon objects to this request because it is vague and ambiguous, “Joint Use Agreements” is an undefined term, and it is unclear which joint use agreements this request refers to. Verizon also objects to this request because it is overly broad, unduly burdensome and seeks information that is not relevant or material to the subject matter of this proceeding, and not reasonably calculated to lead to the discovery of admissible evidence about the just and reasonable rate for Verizon’s use of FirstEnergy’s poles based on FirstEnergy’s pole costs. Verizon further objects to this request

because it requires the compilation of data or information that Verizon does not maintain in the format requested or in the normal course of business and Verizon is not required under the Commission's discovery rules to make a special study or analysis to attempt to compile this information. Verizon will not respond to this request.

54. Verizon objects to this request because it is vague and ambiguous, "new or duplicative (non-replacement) facilities" and "FE PA ILEC Agreements" are undefined terms, and it is unclear which "FE PA ILEC Agreements" this request refers to. Verizon also objects to this request because it is overly broad, unduly burdensome and seeks information that is not relevant or material to the subject matter of this proceeding, and not reasonably calculated to lead to the discovery of admissible evidence about the just and reasonable rate for Verizon's use of FirstEnergy's poles under ten joint use agreements. Verizon further objects to this request to the extent it seeks information that is not within Verizon's possession or control, and because it requires the compilation of data or information that Verizon does not maintain in the format requested or in the normal course of business and Verizon is not required under the Commission's discovery rules to make a special study or analysis to attempt to compile this information. Verizon will not respond to this request.

55. Verizon's objections should be dismissed, and the ALJ should compel Verizon to answer these discovery requests.

56. All these requests are reasonably calculated to lead to the discovery of admissible evidence and are not overly broad, unduly burdensome, or irrelevant.

57. Verizon is challenging the pole attachment rates under the ten Joint Use Agreements at issue as being unjust, unreasonable, and unduly discriminatory.

58. As such, discovery that relates to the rates, terms, and conditions of those agreements, along with Verizon's and FE PA's attachments to their respective poles, is within the broad bounds of discovery in this remand proceeding.

59. In fact, such discovery would provide useful information on the advantages that Verizon enjoys under the Joint Use Agreements that support the justness and reasonableness of the existing pole attachment rates.

60. For instance, if Verizon is attached to a FE PA pole more than once without paying two pole attachment rental rate, it would be example of a benefit Verizon receives under the Joint Use Agreements.

61. This is particularly true given that the Federal Communications Commission (“FCC”) rate formulas that: (a) Verizon desires to have applied to it are based on the use of one foot of space on a pole; and (b) attachments are typically placed at least one foot apart.

62. For Nos. 50 and 51, it is insufficient for Verizon to deny discovery on the basis that the information may be or is in the possession of FE PA.

63. FE PA needs to confirm whether Verizon’s and FE PA’s records and understandings of the facts align with each other.

64. FE PA can only do that by receiving responses from Verizon in discovery on those points.

65. For example, in No. 50, Verizon could take the position that it “fully reimbursed” FE PA for a pole replacement, when FE PA’s records show otherwise.

66. Also, in No. 51, Verizon could identify Verizon-owned facilities that, based on FE PA’s own records, FE PA is unaware of being attached to FE PA’s poles.

67. As for the vagueness objections to Nos. 51 and 52, FE PA clarifies that “Joint Use Agreements” was intended to reference the ten Joint Use Agreements by and between FE PA and Verizon that are at issue in this remanding proceeding.

68. As for the vagueness objection to No. 54, FE PA clarifies that “FE PA ILEC Agreements” was intended to reference the ten Joint Use Agreements by and between FE PA and Verizon that are at issue in this remanding proceeding. Also, “new or duplicative (non-replacement) facilities” refers to: (a) any new pole attachment facilities that Verizon has installed on FE PA’s poles; and (b) any other pole attachment facilities that Verizon has installed on FE PA’s poles that were not replacements for Verizon’s existing pole attachment facilities on FE PA’s poles.

69. Finally, FE PA is not asking Verizon to undertake a special study or analysis in responding to FE PA to VZ Set IV, Nos. 50-51 and 53-54.

70. If Verizon is stating that it does not keep records to reflect which of FE PA’s poles it is attached to or how many attachments it has on each pole, it may answer that it does not know.

71. Like Verizon asserted in response to FE PA’s objections to VZ to FE PA Set IV, FE PA is simply seeking “extant facts” that are in Verizon’s possession. Verizon Motion to Compel, pp. 9 n.1, 10 n.2.

V. **CONCLUSION**

For the reasons set forth above, FirstEnergy Pennsylvania Electric Company respectfully requests that Administrative Law Judge John M. Coogan grant this Motion to Dismiss Objections and Compel Responses and direct Verizon to answer FE PA to VZ Set IV, Nos. 39-42, 50-51, and 53-54 as described above, within seven (7) days from the date of the Order.

Respectfully submitted,



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Dated: June 5, 2026

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

APPENDIX A
FE PA to VZ Set IV

Devin Ryan

dryan@postschell.com
717-612-6052 Direct
717-731-1981 Direct Fax
File #: 180259

May 15, 2026

VIA ELECTRONIC FILING

Suzan D. Paiva, Esquire
Verizon
900 Race Street, 6th Floor
Philadelphia, PA 19107

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Frank Scaduto, Esquire
Wiley Rein LLP
1776 K Street NW
Washington, DC 20006

**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 please find the Interrogatories and Requests for Production of Documents Propounded by FirstEnergy Pennsylvania Electric Company on Verizon Pennsylvania LLC and Verizon North LLC – Set IV for the above-referenced proceeding.

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

Suzan D. Paiva, Esquire
Curtis L. Groves, Esquire
Christopher S. Huther, Esquire
May 15, 2026
Page 2

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "Devin Ryan", with several overlapping strokes and a long horizontal line extending to the right.

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).

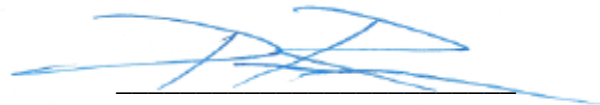
VIA E-MAIL ONLY

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Date: May 15, 2026



Devin T. Ryan

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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

**INTERROGATORIES AND REQUESTS FOR
PRODUCTION OF DOCUMENTS PROPOUNDED BY
FIRSTENERGY PENNSYLVANIA ELECTRIC COMPANY ON
VERIZON PENNSYLVANIA LLC AND VERIZON NORTH LLC – SET IV**

Pursuant to 66 Pa.C.S. § 333 and 52 Pa. Code §§ 5.341 *et seq.*, FirstEnergy Pennsylvania Electric Company (“FE PA” or the “Company”)¹ propound the following Interrogatories and Requests for Production of Documents (hereinafter, “discovery requests”) on Verizon Pennsylvania LLC (“Verizon Pennsylvania”) and Verizon North LLC (“Verizon North”) (collectively, “Verizon”) – Set IV.

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.

INSTRUCTIONS AND DEFINITIONS

1. The “Responding Party,” “you,” or “your” means the party to which these discovery requests are propounded and/or all attorneys, agents, affiliates, subsidiaries, employees, consultants, members, constituents, and representatives acting on behalf of the Responding Party.

2. “Commission” means the Pennsylvania Public Utility Commission.

3. To “identify” a natural person means to state that person’s full name, title or position, employer, last known address, and last known telephone number.

4. To “identify” a business entity means to state the full name of such business, the form of the business, and its location or address.

5. To “identify” a “document” means to provide all of the following information irrespective of whether the document is deemed privileged or subject to any claim of privilege:

- a. The title or other means of identification of each such document;
- b. The date of each such document;
- c. The author, preparer or signer of each such document; and
- d. A description of the subject matter of such document sufficient to permit an understanding of its contents and importance to the testimony or position being examined and the present or last known location of the document. The specific nature of the document should also be stated (*e.g.*, letter, business record, memorandum, computer print-out, etc.).

In lieu of “identifying” any document, it shall be deemed a sufficient compliance with these discovery requests to attach a copy of each such document to the answers hereto and reference said document in the particular interrogatory to which the document is responsive.

6. “Document” means the original and all drafts of all written and graphic matter, however produced or reproduced, of any kind or description, whether or not sent or received, and all copies thereof which are different in any way from the original (whether by interlineation,

date-stamp, notarization, indication of copies sent or received, or otherwise), including without limitation, any paper, book, account, photograph, blueprint, drawing, sketch, schematic, agreement, contract, memorandum, press release, circular, advertising material, correspondence, letter, telegram, telex, object, report, opinion, investigation, record, transcript, hearing, meeting, study, notation, working paper, summary, intra-office communication, diary, chart, minutes, index sheet, computer software, computer-generated records or files, however stored, check, check stub, delivery ticket, bill of lading, invoice, record or recording or summary of any telephone or other conversation, or of any interview or of any conference, or any other written, recorded, transcribed, punched, taped, filmed, or graphic matter of which the Responding Party has or has had possession, custody or control, or of which the Responding Party has knowledge.

7. “Communication” means any manner or form of information or message transmission, however produced or reproduced, whether as a document as herein defined, or orally or otherwise, which is made, distributed, or circulated between or among persons, or data storage or processing units.

8. “Date” means the exact day, month, and year, if ascertainable, or if not, the best approximation thereof.

9. Items referred to in the singular include those in the plural, and items referred to in the plural include those in the singular.

10. Items referred to in the masculine include those in the feminine, and items referred to in the feminine include those in the masculine.

11. The answers provided to these discovery requests should first restate the question asked and identify the person(s) supplying the information.

12. In answering these discovery requests, the Responding Party is requested to furnish all information that is available to the Responding Party, including information in the possession of the Responding Party's attorneys, agents, consultants, or investigators, and not merely such information of the Responding Party's own knowledge. If any of the discovery requests cannot be answered in full after exercising due diligence to secure the requested information, please so state and answer to the extent possible, specifying the Responding Party's inability to answer the remainder, and stating whatever information the Responding Party has concerning the unanswered portions. If the Responding Party's answer is qualified in any particular, please set forth the details of such qualification.

13. As required by 52 Pa. Code §§ 5.342(c) and 5.349(d), if the Responding Party objects to any part of the discovery request, the Responding Party must serve such objections in a separate document from its answers to the discovery requests.

14. If the Responding Party objects to providing any document requested on any ground, identify such document by describing it as set forth in Instruction 5 and state the basis of the objection.

15. If the Responding Party objects to part of a discovery request and refuses to answer that part, state the Responding Party's objection and answer the remaining portion of that discovery request. If the Responding Party objects to the scope or time period of a discovery request and refuses to answer for that scope or time period, state the Responding Party's objection and answer the discovery request for the scope or time period that the Responding Party believes is appropriate.

16. If, in connection with a discovery request, the Responding Party contends that any information, otherwise subject to discovery, is covered by either the attorney-client

privilege, the so-called “attorneys’ work product doctrine,” or any other privilege or doctrine, then specify the general subject matter of the information and the basis to support each such objection.

17. If any information is withheld on grounds of privilege or other protection from disclosure, provide the following information: (a) every person to whom such information has been communicated and from whom such information was learned; (b) the nature and subject matter of the information; and (c) the basis on which the privilege or other protection from disclosure is claimed.

18. As set forth in 52 Pa. Code § 5.342(g), these discovery requests are continuing, and the Responding Party is obliged to change, supplement, and correct all answers given to conform to new or changing information.

19. “Formal Complaint” means the Formal Complaint filed by Verizon against FirstEnergy before the Federal Communications Commission (“FCC”) at Proceeding Number 19-354 and Bureau ID Number EB-19-MD-008, which has been transferred to the Pennsylvania Public Utility Commission at Docket No. C-2020-3019347.

20. “Prehearing Memorandum” means the Prehearing Memorandum filed by Verizon at Docket No. C-2020-3019347 on March 13, 2026.

21. “Initial Brief” means the Initial Brief filed by Verizon at Docket No. C-2020-3019347 on July 28, 2020.

22. “FE PA to VZ Set I” means the Interrogatories and Requests for Production of Documents Propounded on Verizon Pennsylvania LLC and Verizon North LLC – Set I, dated April 17, 2020.

23. “FE PA to VZ Set II” means the Interrogatories and Requests for Production of Documents Propounded on Verizon Pennsylvania LLC and Verizon North LLC – Set II, dated April 24, 2020.

24. “FE PA to VZ Set III” means the Interrogatories and Requests for Production of Documents Propounded on Verizon Pennsylvania LLC and Verizon North LLC – Set III, dated May 8, 2020.

25. “VZ to FE PA Set IV” means the Interrogatories and Requests for Production of Documents Propounded by Verizon Pennsylvania LLC and Verizon North LLC – Set IV, dated April 16, 2026.

26. “Formal Complaint” means the Pole Attachment Complaint originally filed by Verizon in this proceeding.

27. “Verizon’s Motion for Leave” means Verizon’s “Motion to Amend Pole Attachment Complaint” filed on April 9, 2026.

28. “Amended Complaint” means the Amended Pole Attachment Complaint attached to Verizon’s Motion for Leave.

29. “ILEC” means Incumbent Local Exchange Carrier.

30. “CLEC” means Competitive Local Exchange Carrier.

31. “Litigation” means all proceedings concerning the Pole Attachment Complaint, including all proceedings in FCC Proceeding Number 19-354, Bureau ID Number EB-19-MD-008, all proceedings in Pennsylvania Public Utility Commission Docket No. C-2020-3019347, all proceedings seeking further review of the Commission’s decision before the Pennsylvania Commonwealth Court, all proceedings on appeal from the Commonwealth Court’s decision before the Pennsylvania Supreme Court, and all proceedings on remand.

32. “Pole Attachment Agreement” means an agreement between Verizon and any entity for use of space on Verizon’s poles and includes, without limitations, Joint Use Agreements and License Agreements.

33. “Supplemental Testimony” means any supplemental testimony and exhibits submitted on behalf of Verizon during the remand phase of this Litigation.

**INTERROGATORIES AND REQUESTS FOR
PRODUCTION OF DOCUMENTS PROPOUNDED ON
VERIZON PENNSYLVANIA LLC AND VERIZON NORTH LLC – SET IV**

FE PA to VZ-IV-1

Please see FE PA to VZ Set I and Verizon's answers thereto. Provide a supplemental response for each of Verizon's answers or confirm that Verizon does not intend to supplement such answer. If the latter, please provide a detailed explanation as to why Verizon does not intend to supplement that answer.

FE PA to VZ-IV-2

Please see FE PA to VZ Set II and Verizon's answers thereto. Provide a supplemental response for each of Verizon's answers or confirm that Verizon does not intend to supplement such answer. If the latter, please provide a detailed explanation as to why Verizon does not intend to supplement that answer.

FE PA to VZ-IV-3

Please see FE PA to VZ Set III and Verizon's answers thereto. Provide a supplemental response for each of Verizon's answers or confirm that Verizon does not intend to supplement such answer. If the latter, please provide a detailed explanation as to why Verizon does not intend to supplement that answer.

FE PA to VZ-IV-4

Please provide all revenue requirement calculations performed by Verizon or any of its witnesses as part of this Litigation, including all non-privileged Documents, workpapers, analyses, and reports relied by Verizon or any of its witnesses in preparing such revenue requirement calculations.

FE PA to VZ-IV-5

Please provide all cost of service studies performed by Verizon or any of its witnesses as part of this Litigation, including all non-privileged Documents, workpapers, analyses, and reports relied by Verizon or any of its witnesses in preparing such cost of service studies.

FE PA to VZ-IV-6

Please provide all rate design analyses performed by Verizon or any of its witnesses as part of this Litigation, including all non-privileged Documents, workpapers, analyses, and reports relied by Verizon or any of its witnesses in preparing such rate design analyses.

FE PA to VZ-IV-7

Please provide the number of Verizon attachments to Met-Ed's poles for each calendar year for 2020-2023 and the number of Verizon attachments to FE PA's Met-Ed Rate Division's poles for each calendar year for 2024-2025 and for the year to date in 2026. Produce all non-privileged Documents relied upon by Verizon in responding to this request.

FE PA to VZ-IV-8

Please provide the number of Verizon attachments to Penelec's poles for each calendar year for 2020-2023 and the number of Verizon attachments to FE PA's Penelec Rate Division's poles for each calendar year for 2024-2025 and for the year to date in 2026. Produce all non-privileged Documents relied upon by Verizon in responding to this request.

FE PA to VZ-IV-9

Please provide the number of Verizon attachments to Penn Power's poles for each calendar year for 2020-2023 and the number of Verizon attachments to FE PA's Penn Power Rate Division's poles for each calendar year for 2024-2025 and for the year to date in 2026. Produce all non-privileged Documents relied upon by Verizon in responding to this request.

FE PA to VZ-IV-10

Please provide the number of Verizon attachments to West Penn's poles for each calendar year for 2020-2023 and the number of Verizon attachments to FE PA's West Penn Rate Division's poles for each calendar year for 2024-2025 and for the year to date in 2026. Produce all non-privileged Documents relied upon by Verizon in responding to this request.

FE PA to VZ-IV-11

Please provide the number of Met-Ed attachments to Verizon's poles for each calendar year for 2020-2023 and the number of FE PA Met-Ed Rate Division attachments to Verizon's poles for each calendar year for 2024-2025 and for the year to date in 2026. Produce all non-privileged Documents relied upon by Verizon in responding to this request.

FE PA to VZ-IV-12

Please provide the number of Penelec attachments to Verizon's poles for each calendar year for 2020-2023 and the number of FE PA Penelec Rate Division attachments to Verizon's poles for each calendar year for 2024-2025 and for the year to date in 2026. Produce all non-privileged Documents relied upon by Verizon in responding to this request.

FE PA to VZ-IV-13

Please provide the number of Penn Power attachments to Verizon's poles for each calendar year for 2020-2023 and the number of FE PA Penn Power Rate Division attachments to Verizon's poles for each calendar year for 2024-2025 and for the year to date in 2026. Produce all non-privileged Documents relied upon by Verizon in responding to this request.

FE PA to VZ-IV-14

Please provide the number of West Penn attachments to Verizon's poles for each calendar year for 2020-2023 and the number of FE PA West Penn Rate Division attachments to Verizon's poles for each calendar year for 2024-2025 and for the year to date in 2026. Produce all non-privileged Documents relied upon by Verizon in responding to this request.

FE PA to VZ-IV-15

Please provide the date and amount of every payment made by Verizon to Met-Ed or FE PA's Met-Ed Rate Division under the Joint Use Agreements since it filed its Formal Complaint with the FCC on November 20, 2019.

FE PA to VZ-IV-16

Please provide the date and amount of every payment made by Verizon to Penelec or FE PA's Penelec Rate Division under the Joint Use Agreements since it filed its Formal Complaint with the FCC on November 20, 2019.

FE PA to VZ-IV-17

Please provide the date and amount of every payment made by Verizon to Penn Power or FE PA's Penn Power Rate Division under the Joint Use Agreements since it filed its Formal Complaint with the FCC on November 20, 2019.

FE PA to VZ-IV-18

Please explain in detail why Verizon stopped making payments to FE PA and any of the Company's predecessor entities under the Joint Use Agreements that Verizon has with FE PA and any of the Company's predecessor entities.

FE PA to VZ-IV-19

Is Verizon aware of any other ILECs with attachments on FE PA's poles that have failed to remit payment to FE PA for as long as Verizon? If so, please identify each such ILEC.

FE PA to VZ-IV-20

Is Verizon aware of any CLECs with attachments on FE PA's poles that have failed to remit payment to FE PA for as long as Verizon? If so, please identify each such CLEC.

FE PA to VZ-IV-21

Is Verizon aware of any cable companies with attachments on FE PA's poles that have failed to remit payment to FE PA for as long as Verizon? If so, please identify each such cable company.

FE PA to VZ-IV-22

Does Verizon agree that FE PA needs Verizon to provide AUS Telephone Plant Index data to FE PA so that Verizon can be invoiced for its attachments to the Met-Ed and Penelec Rate Divisions' poles under the Joint Use Agreements? If not, please explain in detail why and provide all non-privileged Documents relied upon in reaching that conclusion and responding to this interrogatory.

FE PA to VZ-IV-23

Please state on which date Verizon last provided the AUS Telephone Plant Index data to FE PA and any of its predecessor entities and explain in detail why Verizon has refused to provide the data since that date.

FE PA to VZ-IV-24

Reference the "2020 AUS.pdf" provided in the response to VZ to FE PA Set IV, No. 2 (CONFIDENTIAL). Please provide the equivalent document for each of the following years: 2021, 2022, 2023, 2024, and 2025.

FE PA to VZ-IV-25

Has Verizon performed any calculation of the amount it currently owes FE PA under the Joint Use Agreement, as offset by the refund requested by Verizon back to November 20, 2015? If so, please provide such calculation and all non-privileged Documents, workpapers, and analyses relied upon by Verizon to perform any such calculation.

FE PA to VZ-IV-26

Has Verizon performed any calculation of the amount it currently owes FE PA under the Joint Use Agreement, as offset by the refund requested by Verizon as limited to the refund period beginning November 20, 2019? If so, please provide such calculation and all non-privileged Documents, workpapers, and analyses relied upon by Verizon to perform any such calculation.

FE PA to VZ-IV-27

Has Verizon performed any calculation of the amount it owes to FE PA under the Joint Use Agreements to date without the refund requested by Verizon? If so, please provide such calculation and all non-privileged Documents, workpapers, and analyses relied upon by Verizon to perform any such calculation.

FE PA to VZ-IV-28

Please identify and provide all non-privileged Documents concerning Verizon's view of the potential impact of this Litigation, including the potential impact of the relief sought by this Litigation on: (1) the rates FE PA charges its customers; and (2) Verizon's efforts to provide or expand broadband service.

FE PA to VZ-IV-29

- (a) Please provide Verizon Pennsylvania's annual budget for capital investments in broadband infrastructure in Pennsylvania for each of the following years: 2020, 2021, 2022, 2023, 2024, and 2025. Please provide all non-privileged Documents relied upon in answering this discovery request.
- (b) Please provide Verizon Pennsylvania's actual expenditures for capital investments in broadband infrastructure in Pennsylvania for each of the following years: 2020, 2021, 2022, 2023, 2024, and 2025. Please provide all non-privileged Documents relied upon in answering this discovery request.
- (c) Please provide Verizon Pennsylvania's annual budget for capital investments in broadband infrastructure in Pennsylvania for each of the following years: 2026, 2027, and 2028. Please provide all non-privileged Documents relied upon in answering this discovery request.

FE PA to VZ-IV-30

- (a) Please provide Verizon North's annual budget for capital investments in broadband infrastructure in Pennsylvania for each of the following years: 2020, 2021, 2022, 2023, 2024, and 2025. Please provide all non-privileged Documents relied upon in answering this discovery request.
- (b) Please provide Verizon North's actual expenditures for capital investments in broadband infrastructure in Pennsylvania for each of the following years: 2020, 2021, 2022, 2023, 2024, and 2025. Please provide all non-privileged Documents relied upon in answering this discovery request.
- (c) Please provide Verizon North's annual budget for capital investments in broadband infrastructure in Pennsylvania for each of the following years:

2026, 2027, and 2028. Please provide all non-privileged Documents relied upon in answering this discovery request.

FE PA to VZ-IV-31

- (a) Please state whether and to what extent Verizon Pennsylvania's annual budgets provided in response to FE PA to VZ-IV-29(a) changed due to the Commission's Final Order entered on December 18, 2020. Please provide all non-privileged Documents relied upon in answering this discovery request.
- (b) Please state whether and to what extent Verizon Pennsylvania's actual expenditures provided in response to FE PA to VZ-IV-29(b) changed due to the Commission's Final Order entered on December 18, 2020. Please provide all non-privileged Documents relied upon in answering this discovery request.
- (c) Please state whether and to what extent Verizon Pennsylvania's annual budgets provided in response to FE PA to VZ-IV-29(c) would change if Verizon were to obtain its requested relief in this Litigation. Please provide all non-privileged Documents relied upon in answering this discovery request.

FE PA to VZ-IV-32

- (a) Please state whether and to what extent Verizon North's annual budgets provided in response to FE PA to VZ-IV-30(a) changed due to the Commission's Final Order entered on December 18, 2020. Please provide all non-privileged Documents relied upon in answering this discovery request.
- (b) Please state whether and to what extent Verizon North's actual expenditures provided in response to FE PA to VZ-IV-30(b) changed due to the Commission's Final Order entered on December 18, 2020. Please provide all non-privileged Documents relied upon in answering this discovery request.
- (c) Please state whether and to what extent Verizon North's annual budgets provided in response to FE PA to VZ-IV-30(c) would change if Verizon were to obtain its requested relief in this Litigation. Please provide all non-privileged Documents relied upon in answering this discovery request.

FE PA to VZ-IV-33

Please reference "Shapiro Administration Plan to Drive Out More Than \$711 Million to Connect Every Pennsylvanian to High-Speed Internet Approved by NTIA," COMMONWEALTH OF PENNSYLVANIA (Apr. 29, 2026), *available at* <https://www.pa.gov/governor/newsroom/2026-press-releases/shapiro->

[administration-plans--711-million-investment-on-high-spe](#) (“BEAD Press Release”).

- (a) Please state whether Verizon agrees with the BEAD Press Release issued by Governor Josh Shapiro’s Press Office that the Broadband Equity, Access, and Deployment (“BEAD”) grants will “connect the remaining locations across the Commonwealth currently lacking high-speed internet service.” If the answer is anything other than an unqualified “Yes,” please explain in detail Verizon’s position and provide all non-privileged Documents relied upon in reaching that conclusion and in answering this discovery request.
- (b) How much of the “\$204 million” that the PBDA has invested “through the Broadband Infrastructure Program” was for Verizon projects?
- (c) Please provide all non-privileged Documents concerning any of the “\$204 million” that the PBDA has invested “through the Broadband Infrastructure Program” for Verizon projects.
- (d) Please provide Verizon’s estimate, if any, of the additional investment that Verizon needs to “connect the remaining locations across the Commonwealth currently lacking high-speed internet service” after accounting for the BEAD grants that have been awarded. Please also provide all non-privileged Documents relied upon in calculating that estimate.
- (e) Please provide Verizon’s estimate, if any, of the additional investment that Verizon needs to “connect the remaining locations” in each of FE PA’s Rate Divisions’ service territories (as described on Page Nos. 6-20 in the Company’s Commission-approved Retail Tariff, available at <https://www.firstenergycorp.com/content/dam/customer/Customer%20Choice/Files/PA/tariffs/fe-pa-retail-tariff-4-1-26.pdf>) that are “currently lacking high-speed internet service” after accounting for the BEAD grants that have been awarded. Please also provide all non-privileged Documents relied upon in calculating those estimates.

FE PA to VZ-IV-34

Please reference “Pennsylvania Broadband, Equity, Access and Deployment (BEAD) Program,” PENNSYLVANIA BROADBAND DEPLOYMENT AUTHORITY, available at <https://broadband.pa.gov/wp-content/uploads/2026/04/BEAD-Provisional-Grantee-Approval-List-4-27-26.pdf>.

Please provide all non-privileged Documents concerning Verizon’s applications for grants under the BEAD program, including, but not limited to, the BEAD grant applications submitted by or on behalf of Verizon.

Please reference “Pennsylvania Broadband, Equity, Access and Deployment (BEAD) Program,” PENNSYLVANIA BROADBAND DEPLOYMENT AUTHORITY, available at https://broadband.pa.gov/wp-content/uploads/2026/04/BEAD-Provisional-Grantee-Approval-List_4-27-26.pdf.

- (a) Of the 14,297 locations for which Verizon has been approved to receive grants totaling \$108,804,695, how many of those locations are in the service territory of FE PA’s Met-Ed Rate Division (as described on Page Nos. 6-20 in the Company’s Commission-approved Retail Tariff, available at <https://www.firstenergycorp.com/content/dam/customer/Customer%20Choice/Files/PA/tariffs/fe-pa-retail-tariff-4-1-26.pdf>)?
- (b) Of the locations identified in response to subpart (a), how many will rely on FE PA Met-Ed Rate Division poles to receive service from Verizon?
- (c) Of the \$108,804,695 in grants for which Verizon has been approved, how much of those grants would be utilized for projects located in the service territory of FE PA’s Met-Ed Rate Division (as described on Page Nos. 6-20 in the Company’s Commission-approved Retail Tariff, available at <https://www.firstenergycorp.com/content/dam/customer/Customer%20Choice/Files/PA/tariffs/fe-pa-retail-tariff-4-1-26.pdf>)?
- (d) Of the 14,297 locations for which Verizon has been approved to receive grants totaling \$108,804,695, how many of those locations are in the service territory of FE PA’s Penelec Rate Division (as described on Page Nos. 6-20 in the Company’s Commission-approved Retail Tariff, available at <https://www.firstenergycorp.com/content/dam/customer/Customer%20Choice/Files/PA/tariffs/fe-pa-retail-tariff-4-1-26.pdf>)?
- (e) Of the locations identified in response to subpart (d), how many will rely on FE PA Penelec Rate Division poles to receive service from Verizon?
- (f) Of the \$108,804,695 in grants for which Verizon has been approved, how much of those grants would be utilized for projects located in the service territory of FE PA’s Penelec Division (as described on Page Nos. 6-20 in the Company’s Commission-approved Retail Tariff, available at <https://www.firstenergycorp.com/content/dam/customer/Customer%20Choice/Files/PA/tariffs/fe-pa-retail-tariff-4-1-26.pdf>)?
- (g) Of the 14,297 locations for which Verizon has been approved to receive grants totaling \$108,804,695, how many of those locations are in the service territory of FE PA’s Penn Power Rate Division (as described on Page Nos. 6-20 in the Company’s Commission-approved Retail Tariff, available at <https://www.firstenergycorp.com/content/dam/customer/Customer%20Choice/Files/PA/tariffs/fe-pa-retail-tariff-4-1-26.pdf>)?

- (h) Of the locations identified in response to subpart (g), how many will rely on FE PA Penn Power Rate Division poles to receive service from Verizon?
- (i) Of the \$108,804,695 in grants for which Verizon has been approved, how much of those grants would be utilized for projects located in the service territory of FE PA's Penn Power Rate Division (as described on Page Nos. 6-20 in the Company's Commission-approved Retail Tariff, available at <https://www.firstenergycorp.com/content/dam/customer/Customer%20Choice/Files/PA/tariffs/fe-pa-retail-tariff-4-1-26.pdf>)?
- (j) Of the 14,297 locations for which Verizon has been approved to receive grants totaling \$108,804,695, how many of those locations are in the service territory of FE PA's West Penn Rate Division (as described on Page Nos. 6-20 in the Company's Commission-approved Retail Tariff, available at <https://www.firstenergycorp.com/content/dam/customer/Customer%20Choice/Files/PA/tariffs/fe-pa-retail-tariff-4-1-26.pdf>)?
- (k) Of the locations identified in response to subpart (g), how many will rely on FE PA West Penn Rate Division poles to receive service from Verizon?
- (l) Of the \$108,804,695 in grants for which Verizon has been approved, how much of those grants would be utilized for projects located in the service territory of FE PA's West Penn Rate Division (as described on Page Nos. 6-20 in the Company's Commission-approved Retail Tariff, available at <https://www.firstenergycorp.com/content/dam/customer/Customer%20Choice/Files/PA/tariffs/fe-pa-retail-tariff-4-1-26.pdf>)?

FE PA to VZ-IV-36

For each year beginning with 2020, provide the New Telecom Rate for a communications provider's use of one foot of space on: (1) Verizon Pennsylvania's poles; and (b) Verizon North's poles. In answering this question, provide for each New Telecom Rate the calculation performed by Verizon 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 Verizon has not calculated a New Telecom Rate, provide all inputs and identify all source data required to calculate the rate. Provide all non-privileged Documents concerning all calculations and inputs, including all source data, if they are not publicly available. Separately present the information for poles owned by Verizon Pennsylvania and Verizon North.

FE PA to VZ-IV-37

For each year beginning with 2020, please provide:

- (a) The rental or deficiency rate that Verizon contends applies to FE PA's or its predecessors' use of Verizon's poles under the Joint Use Agreements and,

if different, the rental or deficiency rate that Verizon charged FE PA or its predecessors;

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

In answering this question, provide for each rental or deficiency rate Verizon'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 Verizon has not calculated the rental or deficiency rate that it contends applies to Verizon's use of FE PA's or its predecessors' poles and/or the rental rate that Verizon contends applies to FE PA's or its predecessors' 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 non-privileged 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 FE PA's Met-Ed, Penelec, Penn Power, and West Penn Rate Divisions.

FE PA to VZ-IV-38

Please identify and provide all non-privileged internal communications, memoranda, analyses, reports, documents, and presentations concerning FirstEnergy's assessment, at any time since July 12, 2011, of whether the pole attachment rates charged to Verizon under the Joint Use Agreements were consistent with the New Telecom Rate, the just and reasonable rate standard under 47 U.S.C. § 224(b)(1), the just and reasonable rate standard under the Pennsylvania Public Utility Code, 66 Pa. C.S. § 1301(a), the non-discriminatory rate standard under the Pennsylvania Public Utility Code, 66 Pa. C.S. § 1304, the Pennsylvania Public Utility Commission's pole attachment regulations, 52 Pa. Code §§ 77.1-77.7, the FCC's 2011 *Pole Attachment Order*, and/or the FCC's 2018 *Third Report and Order*, including any analyses of the financial impact of adjusting those rates.

FE PA to VZ-IV-39

For each year beginning with 2009, please identify all entities that had a Pole Attachment Agreement with Verizon state whether the entity was an electric utility, 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 Verizon charged or was charged by the entity, (c) the rate and/or amount that Verizon collected from or paid to 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 Verizon collected from or paid to the entity and, if applicable, (f) the rate and/or amount that applied to Verizon's or the entity's use of the poles, (g) the number of Verizon's poles used by the entity or the number of the entity's poles used by Verizon, and (h) the total net rental amount collected from or paid to the entity. Provide all non-privileged Documents concerning Verizon's response to this discovery request, including all source data and workpapers. Separately present the information for poles owned by Verizon Pennsylvania and Verizon North.

FE PA to VZ-IV-40

For each year beginning with 2020, please describe in detail the method or formula Verizon used to calculate the pole attachment rate(s) it charged cable companies and CLECs. For each pole attachment rate charged, provide Verizon'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 discovery request differs from the rate identified in response to FE PA to VZ-IV-36 for the same pole owner and same year, describe in detail the reason for the difference. Provide all non-privileged Documents concerning all calculations and inputs, including all source data, if they are not publicly available. Separately present the information for poles owned by Verizon Pennsylvania and Verizon North.

FE PA to VZ-IV-41

Please provide Verizon Pennsylvania's Pole Attachment Agreements.

FE PA to VZ-IV-42

Please provide Verizon North's Pole Attachment Agreements.

FE PA to VZ-IV-43

Within two business days of the service of Verizon's Supplemental Testimony in this proceeding, please identify and provide all non-privileged Documents, workpapers, reports, and analyses that Verizon's witnesses considered or relied upon in preparing such Supplemental Testimony.

FE PA to VZ-IV-44

Please provide all non-privileged Documents, workpapers, and analyses concerning any audits of Verizon's poles that Verizon has performed from 2015 to present.

FE PA to VZ-IV-45

Please describe the timing and of costs incurred by Verizon to replace Verizon-owned poles that have failed inspection. Please produce all non-privileged Documents relied upon in responding to this request.

FE PA to VZ-IV-46

Please describe the timing of and costs incurred by Verizon to replace Verizon-owned poles that have been damaged due to car accidents. Please produce all non-privileged Documents relied upon in responding to this request.

FE PA to VZ-IV-47

Please describe the timing of and costs incurred by Verizon to replace Verizon-owned poles that have been damaged due to storms. Please produce all non-privileged Documents relied upon in responding to this request.

FE PA to VZ-IV-48

From 2015 to present, please identify all Verizon-owned poles carrying FE PA facilities that were replaced by Verizon due to a car accident. In the response, please provide, for each incident, the pole number, the pole location, the date of the accident, the date of replacement, and the costs incurred by Verizon associated with the replacement. Please produce all non-privileged Documents relied upon in responding to this request.

FE PA to VZ-IV-49

From 2015 to present, please identify all Verizon-owned poles carrying FE PA facilities that were replaced by Verizon due to a storm. In the response, please provide, for each incident, the pole number, the pole location, the date of the storm, the date of replacement, and the costs incurred by Verizon associated with the

replacement. Please produce all non-privileged Documents relied upon in responding to this request.

FE PA to VZ-IV-50

From 2015 to present, please identify all Verizon-owned poles carrying FE PA facilities that were replaced by FE PA, for which Verizon fully reimbursed FE PA. In the response, please provide, for each instance, the pole number, the pole location, the date of notification of the incident requiring replacement, and the date of replacement. Please produce all non-privileged Documents relied upon in responding to this request.

FE PA to VZ-IV-51

Please state whether Verizon has installed more than one communications line on any poles subject to its Joint Use Agreements with FE PA and any of FE PA's predecessors since 2015. If so, please provide, for each instance, the pole number, pole location, and the year the additional communication line(s) were installed. Please produce all non-privileged Documents relied upon in responding to this request.

FE PA to VZ-IV-52

- (a) Please provide the average amount of space occupied by Verizon's facilities on FE PA-owned poles subject to Verizon's Joint Use Agreements with FE PA's Met-Ed Rate Division. Please produce all non-privileged Documents relied upon in responding to this request.
- (b) Please provide the average amount of space occupied by Verizon's facilities on FE PA-owned poles subject to Verizon's Joint Use Agreements with FE PA's Penelec Rate Division. Please produce all non-privileged Documents relied upon in responding to this request.
- (c) Please provide the average amount of space occupied by Verizon's facilities on FE PA-owned poles subject to Verizon's Joint Use Agreements with FE PA's Penn Power Rate Division. Please produce all non-privileged Documents relied upon in responding to this request.

FE PA to VZ-IV-53

Please state whether Verizon still utilizes any copper wire facilities on FE PA-owned poles subject to Verizon's Joint Use Agreements with FE PA. Please produce all non-privileged Documents relied upon in responding to this request.

FE PA to VZ-IV-54

Please state whether Verizon has deployed new or duplicative (non-replacement) facilities on FE PA-owned poles subject to Verizon's FE PA ILEC agreements

since 2015. If so, please provide, for each instance, the pole number, pole location, the year the additional facility or facilities were installed, and any associated make-ready costs paid by Verizon in conjunction with the installation of such facility or facilities. Please produce all non-privileged Documents relied upon in responding to this request.

APPENDIX B

Verizon's Objections to FE PA to VZ Set IV



900 Race Street
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Philadelphia, PA 19107

Suzan DeBusk Paiva
Associate General Counsel
Suzan.d.paiva@verizon.com
(267) 768-6184

May 20, 2026

Via eFile

Devin T. Ryan
Post & Schell P.C
One Oxford Centre
301 Grant Street, Suite 3010
Pittsburgh, PA 15219

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 Mr. Ryan:

Enclosed please find Verizon's Objections to FirstEnergy's Fourth Set of Interrogatories and Requests for Production in the above captioned matter.

Please do not hesitate to contact me should you have any questions.

Sincerely,

Suzan D. Paiva

Cc via eFiling:

Secretary Matthew Homsher (Cover Letter and Certificate Only)

Cc via email:

The Honorable John M. Coogan (Cover Letter and Certificate Only)
Certificate of Service (attached)

CERTIFICATE OF SERVICE

I, Suzan D. Paiva, hereby certify that I have this day served a true copy of Verizon's Objections to FirstEnergy's Fourth Set of Interrogatories and Requests for Production upon the participants listed below in accordance with the requirements of 52 Pa. Code Section 1.54 (related to service by a participant) and 1.55 (related to service upon attorneys).

Dated at Philadelphia, Pennsylvania, this 20th day of May, 2026.

VIA E-MAIL

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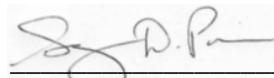
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Attorney for Verizon

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Verizon Pennsylvania LLC and	:	
Verizon North LLC	:	
	:	
v.	:	C-2020-3019347
Metropolitan Edison Company, Pennsylvania	:	
Electric Company and Penn Power Company	:	
now known as FirstEnergy Pennsylvania	:	
Electric Company	:	

**VERIZON’S OBJECTIONS TO SET IV INTERROGATORIES AND
REQUESTS FOR PRODUCTION OF DOCUMENTS PROPOUNDED BY
FIRSTENERGY PENNSYLVANIA ELECTRIC COMPANY**

Verizon Pennsylvania LLC and Verizon North LLC (collectively, “Verizon”), pursuant to 52 Pa. Code §§ 5.321, 5.342, 5.349, and 5.361, object to the Set IV Interrogatories and Requests for Production of Documents propounded by FirstEnergy Pennsylvania Electric Company (“FirstEnergy”) on May 15, 2026, as follows.

GENERAL OBJECTIONS

1. Notwithstanding the broad definitions of “Responding Party,” “you,” and “your” as including “affiliates,” Verizon presumes that FirstEnergy’s requests are addressed to Verizon Pennsylvania LLC and Verizon North LLC and will answer accordingly. To the extent FirstEnergy intended to ask about affiliates not party to this case, Verizon objects on the ground that such information is outside this Commission’s jurisdiction or otherwise seeks information that is not relevant and not reasonably calculated to lead to the discovery of admissible evidence.

2. Verizon objects to the extent FirstEnergy purports to request information not available in the ordinary course of business and/or to require Verizon to undertake an unduly burdensome search or special study. Subject to the limitations set forth in its other objections, Verizon will provide only such responsive information as is available to it in the ordinary course

of business following a reasonably diligent search of the files that are reasonably expected to contain the responsive information.

3. Verizon objects to the extent FirstEnergy does not limit each request to a single question or request for information.

4. Verizon objects to the extent that FirstEnergy's requests purport to seek legal analysis, and/or information and documents that are protected from disclosure by the attorney-client privilege, attorney work product privilege, or other such privilege.

5. Verizon objects to the requests to the extent that they seek information that is not within Verizon's possession, custody, or control or information that is not within Verizon's present knowledge.

6. Verizon objects to the requests to the extent that they call for information that is already within FirstEnergy's possession, custody, or control.

7. Verizon objects to the requests to the extent that they seek discovery of legal conclusions, contentions, or information that is publicly available.

8. Verizon objects to the requests to the extent that the burden or expense of answering the Interrogatory or Request for Production would outweigh any benefit of the answer.

9. Verizon objects to the requests to the extent that they purport to impose requirements or obligations on Verizon in addition to or different from those imposed by the Commission's rules. In responding to the requests, Verizon will respond as required under the Commission's rules.

10. Verizon reserves the right to change or modify any objection should it become aware of additional facts or circumstances following the service of these objections.

11. The foregoing general objections are hereby incorporated into each specific objection listed below, and each specific objection is made subject to and without waiver of the foregoing general objections.

SPECIFIC OBJECTIONS

FE PA to VZ-IV-1:

Please see FE PA to VZ Set I and Verizon's answers thereto. Provide a supplemental response for each of Verizon's answers or confirm that Verizon does not intend to supplement such answer. If the latter, please provide a detailed explanation as to why Verizon does not intend to supplement that answer.

Objections:

Verizon objects to this request because it is overly broad, unduly burdensome, and seeks to impose obligations on Verizon in addition to those imposed by the Commission's rules. Verizon also objects because FirstEnergy waived its right to seek responses to several Set I requests by failing to timely file a motion to compel and because ALJ Cheskis denied FirstEnergy's motion to compel responses to Set I requests 1, 20, and 21. Verizon also incorporates by reference its objections to the Set I requests. Notwithstanding the foregoing, for Set I requests that Verizon previously provided a response to, Verizon will update its prior response at an appropriate time to the extent required by the Commission's rules.

FE PA to VZ-IV-2:

Please see FE PA to VZ Set II and Verizon's answers thereto. Provide a supplemental response for each of Verizon's answers or confirm that Verizon does not intend to supplement such answer. If the latter, please provide a detailed explanation as to why Verizon does not intend to supplement that answer.

Objections:

Verizon objects to this request because it is overly broad, unduly burdensome, and seeks to impose obligations on Verizon in addition to those imposed by the Commission's rules. Verizon also objects because FirstEnergy waived its right to seek responses to several Set II requests by failing to timely file a motion to compel. Verizon also incorporates by reference its objections to the Set II requests. Notwithstanding the foregoing, for Set II requests that Verizon previously provided a response to, Verizon will update its prior response at an appropriate time to the extent required by the Commission's rules.

FE PA to VZ-IV-3:

Please see FE PA to VZ Set III and Verizon’s answers thereto. Provide a supplemental response for each of Verizon’s answers or confirm that Verizon does not intend to supplement such answer. If the latter, please provide a detailed explanation as to why Verizon does not intend to supplement that answer.

Objections:

Verizon objects to this request because there are no “Interrogatories and Requests for Production of Documents Propounded on Verizon Pennsylvania LLC and Verizon North LLC – Set III, dated May 8, 2020.” To the extent this request refers to the Interrogatories and Requests for Production of Documents Propounded on Verizon Pennsylvania LLC and Verizon North LLC – Set III, dated May 7, 2020, Verizon objects to this request because it is overly broad, unduly burdensome, and seeks to impose obligations on Verizon in addition to those imposed by the Commission’s rules. Verizon also objects because FirstEnergy waived its right to seek responses to several Set III requests by failing to timely file a motion to compel and because ALJ Cheskis denied FirstEnergy’s motion to compel responses to Set III request 1. Notwithstanding the foregoing, for Set III requests that Verizon previously provided a response to, Verizon will update its prior response at an appropriate time to the extent required by the Commission’s rules.

FE PA to VZ-IV-4:

Please provide all revenue requirement calculations performed by Verizon or any of its witnesses as part of this Litigation, including all non-privileged Documents, workpapers, analyses, and reports relied by Verizon or any of its witnesses in preparing such revenue requirement calculations.

Objections:

Verizon objects to this request because “revenue requirement calculations” is a vague, ambiguous and undefined term and it is not possible to answer the request without further clarification about the revenue requirement referenced. Verizon also objects to this request to the extent it seeks privileged information, drafts of testimony or exhibits, publicly available information, calculations that have already been served on FirstEnergy, and/or calculations that Verizon or its witnesses have not yet completed and/or served pursuant to the procedural schedule. Subject to and without waiver of its objections, should FirstEnergy provide Verizon sufficient clarification about what it is seeking, Verizon will update its objections within five days and/or indicate that it will provide a response within fifteen days.

FE PA to VZ-IV-5:

Please provide all cost of service studies performed by Verizon or any of its witnesses as part of this Litigation, including all non-privileged Documents, workpapers, analyses, and reports relied by Verizon or any of its witnesses in preparing such cost of service studies.

Objections:

Verizon objects to this request because “cost of service studies” is a vague, ambiguous and undefined term and it is not possible to answer the request without further clarification about the service referenced. Verizon also objects to this request to the extent it seeks privileged information, drafts of testimony or exhibits, publicly available information, studies that have already been served on FirstEnergy, and/or studies that Verizon or its witnesses have not yet completed and/or served pursuant to the procedural schedule. Subject to and without waiver of its objections, should FirstEnergy provide Verizon sufficient clarification about what it is seeking, Verizon will update its objections within five days and/or indicate that it will provide a response within fifteen days.

FE PA to VZ-IV-6:

Please provide all rate design analyses performed by Verizon or any of its witnesses as part of this Litigation, including all non-privileged Documents, workpapers, analyses, and reports relied by Verizon or any of its witnesses in preparing such rate design analyses.

Objections:

Verizon objects to this request because “rate design analyses” is a vague, ambiguous and undefined term and it is not possible to answer the request without further clarification about the rate referenced. Verizon also objects to this request to the extent it seeks privileged information, drafts of testimony or exhibits, publicly available information, analyses that have already been served on FirstEnergy, and/or analyses that Verizon or its witnesses have not yet completed and/or served pursuant to the procedural schedule. Subject to and without waiver of its objections, should FirstEnergy provide Verizon sufficient clarification about what it is seeking, Verizon will update its objections within five days and/or indicate that it will provide a response within fifteen days.

FE PA to VZ-IV-7:

Please provide the number of Verizon attachments to Met-Ed’s poles for each calendar year for 2020-2023 and the number of Verizon attachments to FE PA’s Met-Ed Rate Division’s poles for each calendar year for 2024-2025 and for the year to date in 2026. Produce all non-privileged Documents relied upon by Verizon in responding to this request.

Objections:

Verizon objects to this request because it is overly broad, unduly burdensome and seeks information about pole attachments that are not at issue in this proceeding, are not relevant or material to the subject matter of this proceeding, and are not reasonably calculated to lead to the discovery of admissible evidence about the just and reasonable rate for Verizon’s use of FirstEnergy’s poles under ten joint use agreements. Verizon also objects to this request because “Met-Ed Rate Division” is an undefined term and Verizon is not aware which, if any, poles are owned by the Met-Ed Rate Division and does not have access to FirstEnergy’s internal

determination of the exact boundary lines of the Met-Ed Rate Division. Subject to and without waiver of its objections, Verizon is currently investigating the availability of data over the requested time period about Verizon's attachments to poles Verizon understood to be owned by Met-Ed prior to FirstEnergy's 2024 merger transaction under the joint use agreements at issue in this case and will provide a response if it maintains such data in the format requested without undertaking a special study, or it will verify if it does not do so.

FE PA to VZ-IV-8:

Please provide the number of Verizon attachments to Penelec's poles for each calendar year for 2020-2023 and the number of Verizon attachments to FE PA's Penelec Rate Division's poles for each calendar year for 2024-2025 and for the year to date in 2026. Produce all non-privileged Documents relied upon by Verizon in responding to this request.

Objections:

Verizon objects to this request because it is overly broad, unduly burdensome and seeks information about pole attachments that are not at issue in this proceeding, are not relevant or material to the subject matter of this proceeding, and are not reasonably calculated to lead to the discovery of admissible evidence about the just and reasonable rate for Verizon's use of FirstEnergy's poles under ten joint use agreements. Verizon also objects to this request because "Penelec Rate Division" is an undefined term and Verizon is not aware which, if any, poles are owned by the Penelec Rate Division and does not have access to FirstEnergy's internal determination of the exact boundary lines of the Penelec Rate Division. Subject to and without waiver of its objections, Verizon is currently investigating the availability of data over the requested time period about Verizon's attachments to poles Verizon understood to be owned by Penelec prior to FirstEnergy's 2024 merger transaction under the joint use agreements at issue in this case and will provide a response if it maintains such data in the format requested without undertaking a special study, or it will verify if it does not do so.

FE PA to VZ-IV-9:

Please provide the number of Verizon attachments to Penn Power's poles for each calendar year for 2020-2023 and the number of Verizon attachments to FE PA's Penn Power Rate Division's poles for each calendar year for 2024-2025 and for the year to date in 2026. Produce all non-privileged Documents relied upon by Verizon in responding to this request.

Objections:

Verizon objects to this request because "Penn Power Rate Division" is an undefined term and Verizon is not aware which, if any, poles are owned by the Penn Power Rate Division and does not have access to FirstEnergy's internal determination of the exact boundary lines of the Penn Power Rate Division. Subject to and without waiver of its objections, Verizon is currently investigating the availability of data over the requested time period about Verizon's attachments to poles Verizon understood to be owned by Penn Power prior to FirstEnergy's 2024 merger transaction under the joint use agreements at issue in this case and will provide a response if it

maintains such data in the format requested without undertaking a special study, or it will verify if it does not do so.

FE PA to VZ-IV-10:

Please provide the number of Verizon attachments to West Penn’s poles for each calendar year for 2020-2023 and the number of Verizon attachments to FE PA’s West Penn Rate Division’s poles for each calendar year for 2024-2025 and for the year to date in 2026. Produce all non-privileged Documents relied upon by Verizon in responding to this request.

Objections:

Verizon objects to this request because it is overly broad, unduly burdensome and seeks information about pole attachments that are not at issue in this proceeding, are not relevant or material to the subject matter of this proceeding, and are not reasonably calculated to lead to the discovery of admissible evidence about the just and reasonable rate for Verizon’s use of FirstEnergy’s poles under ten joint use agreements to which West Penn Power Company is not a party. Verizon also objects to this request because “West Penn Rate Division” is an undefined term and Verizon is not aware which, if any, poles are owned by the West Penn Rate Division and does not have access to FirstEnergy’s internal determination of the exact boundary lines of the West Penn Rate Division. Verizon will not respond to this request.

FE PA to VZ-IV-11:

Please provide the number of Met-Ed attachments to Verizon’s poles for each calendar year for 2020-2023 and the number of FE PA Met-Ed Rate Division attachments to Verizon’s poles for each calendar year for 2024-2025 and for the year to date in 2026. Produce all non-privileged Documents relied upon by Verizon in responding to this request.

Objections:

Verizon objects to this request because it is overly broad, unduly burdensome and seeks information about pole attachments that are not at issue in this proceeding, are not relevant or material to the subject matter of this proceeding, and are not reasonably calculated to lead to the discovery of admissible evidence about the just and reasonable rate for Verizon’s use of FirstEnergy’s poles under ten joint use agreements. Verizon also objects to this request because “Met-Ed Rate Division” is an undefined term and Verizon is not aware which, if any, attachments are owned by the Met-Ed Rate Division and does not have access to FirstEnergy’s internal determination of the exact boundary lines of the Met-Ed Rate Division. Subject to and without waiver of its objections, Verizon is currently investigating the availability of data over the requested time period about attachments to Verizon’s poles that Verizon understood to be owned by Met-Ed prior to FirstEnergy’s 2024 merger transaction under the joint use agreements at issue in this case and will provide a response if it maintains such data in the format requested without undertaking a special study, or it will verify if it does not do so.

FE PA to VZ-IV-12:

Please provide the number of Penelec attachments to Verizon’s poles for each calendar year for 2020-2023 and the number of FE PA Penelec Rate Division attachments to Verizon’s poles for each calendar year for 2024-2025 and for the year to date in 2026. Produce all non-privileged Documents relied upon by Verizon in responding to this request.

Objections:

Verizon objects to this request because it is overly broad, unduly burdensome and seeks information about pole attachments that are not at issue in this proceeding, are not relevant or material to the subject matter of this proceeding, and are not reasonably calculated to lead to the discovery of admissible evidence about the just and reasonable rate for Verizon’s use of FirstEnergy’s poles under ten joint use agreements. Verizon also objects to this request because “Penelec Rate Division” is an undefined term and Verizon is not aware which, if any, attachments are owned by the Penelec Rate Division and does not have access to FirstEnergy’s internal determination of the exact boundary lines of the Penelec Rate Division. Subject to and without waiver of its objections, Verizon is currently investigating the availability of data over the requested time period about attachments to Verizon’s poles that Verizon understood to be owned by Penelec prior to FirstEnergy’s 2024 merger transaction under the joint use agreements at issue in this case and will provide a response if it maintains such data in the format requested without undertaking a special study, or it will verify if it does not do so.

FE PA to VZ-IV-13:

Please provide the number of Penn Power attachments to Verizon’s poles for each calendar year for 2020-2023 and the number of FE PA Penn Power Rate Division attachments to Verizon’s poles for each calendar year for 2024-2025 and for the year to date in 2026. Produce all non-privileged Documents relied upon by Verizon in responding to this request.

Objections:

Verizon objects to this request because “Penn Power Rate Division” is an undefined term and Verizon is not aware which, if any, attachments are owned by the Penn Power Rate Division and does not have access to FirstEnergy’s internal determination of the exact boundary lines of the Penn Power Rate Division. Subject to and without waiver of its objections, Verizon is currently investigating the availability of data over the requested time period about attachments to Verizon’s poles that Verizon understood to be owned by Penn Power prior to FirstEnergy’s 2024 merger transaction under the joint use agreements at issue in this case and will provide a response if it maintains such data in the format requested without undertaking a special study, or it will verify if it does not do so.

FE PA to VZ-IV-14:

Please provide the number of West Penn attachments to Verizon’s poles for each calendar year for 2020-2023 and the number of FE PA West Penn Rate Division attachments to Verizon’s

poles for each calendar year for 2024-2025 and for the year to date in 2026. Produce all non-privileged Documents relied upon by Verizon in responding to this request.

Objections:

Verizon objects to this request because it is overly broad, unduly burdensome and seeks information about pole attachments that are not at issue in this proceeding, are not relevant or material to the subject matter of this proceeding, and are not reasonably calculated to lead to the discovery of admissible evidence about the just and reasonable rate for Verizon's use of FirstEnergy's poles under ten joint use agreements to which West Penn Power Company is not a party. Verizon also objects to this request because "West Penn Rate Division" is an undefined term and Verizon is not aware which, if any, attachments are owned by the West Penn Rate Division and does not have access to FirstEnergy's internal determination of the exact boundary lines of the West Penn Rate Division. Verizon will not respond to this request.

FE PA to VZ-IV-15:

Please provide the date and amount of every payment made by Verizon to Met-Ed or FE PA's Met-Ed Rate Division under the Joint Use Agreements since it filed its Formal Complaint with the FCC on November 20, 2019.

Objections:

Verizon objects to this request because it seeks information that is already within FirstEnergy's possession and because "Met-Ed Rate Division" and "Joint Use Agreements" are undefined terms, Verizon does not have access to FirstEnergy's internal determination of the exact boundary lines of the Met-Ed Rate Division, and it is unclear which joint use agreements this request refers to. Verizon further objects to this request because it is overly broad, unduly burdensome and seeks information about rental and non-rental payments that are not at issue in this proceeding, are not relevant or material to the subject matter of this proceeding, and are not reasonably calculated to lead to the discovery of admissible evidence about the just and reasonable rate for Verizon's use of FirstEnergy's poles under ten joint use agreements. Subject to and without waiver of its objections, Verizon will respond to this request to the extent it seeks the date and amount of any pole attachment rental payments made by Verizon to Met-Ed since November 20, 2019 under the rate provision in any of the ten joint use agreements at issue in this case.

FE PA to VZ-IV-16:

Please provide the date and amount of every payment made by Verizon to Penelec or FE PA's Penelec Rate Division under the Joint Use Agreements since it filed its Formal Complaint with the FCC on November 20, 2019.

Objections:

Verizon objects to this request because it seeks information that is already within FirstEnergy's possession and because "Penelec Rate Division" and "Joint Use Agreements" are undefined terms Verizon does not have access to FirstEnergy's internal determination of the exact boundary lines of the Penelec Rate Division, and it is unclear which joint use agreements this request refers to. Verizon further objects to this request because it is overly broad, unduly burdensome and seeks information about rental and non-rental payments that are not at issue in this proceeding, are not relevant or material to the subject matter of this proceeding, and are not reasonably calculated to lead to the discovery of admissible evidence about the just and reasonable rate for Verizon's use of FirstEnergy's poles under ten joint use agreements. Subject to and without waiver of its objections, Verizon will respond to this request to the extent it seeks the date and amount of any pole attachment rental payments made by Verizon to Penelec since November 20, 2019 under the rate provision in any of the ten joint use agreements at issue in this case.

FE PA to VZ-IV-17:

Please provide the date and amount of every payment made by Verizon to Penn Power or FE PA's Penn Power Rate Division under the Joint Use Agreements since it filed its Formal Complaint with the FCC on November 20, 2019.

Objections:

Verizon objects to this request because it seeks information that is already within FirstEnergy's possession and because "Penn Power Rate Division" and "Joint Use Agreements" are undefined terms Verizon does not have access to FirstEnergy's internal determination of the exact boundary lines of the Penn Power Rate Division, and it is unclear which joint use agreements this request refers to. Verizon further objects to this request because it is overly broad, unduly burdensome and seeks information about non-rental payments that are not at issue in this proceeding, are not relevant or material to the subject matter of this proceeding, and are not reasonably calculated to lead to the discovery of admissible evidence about the just and reasonable rate for Verizon's use of FirstEnergy's poles under ten joint use agreements. Subject to and without waiver of its objections, Verizon will provide a response to this request to the extent it seeks the date and amount of any pole attachment rental payments made by Verizon to Penn Power since November 20, 2019 under the rate provision in any of the ten joint use agreements at issue in this case.

FE PA to VZ-IV-18:

Please explain in detail why Verizon stopped making payments to FE PA and any of the Company's predecessor entities under the Joint Use Agreements that Verizon has with FE PA and any of the Company's predecessor entities.

Objections:

Verizon objects to this request because “Joint Use Agreements” is an undefined term and the request lacks any time restriction, so is overly broad, unduly burdensome, and seeks information that is not relevant or material or reasonably calculated to lead to the discovery of admissible evidence. Verizon also objects to this request to the extent that it assumes payments were due to FE PA and/or any of the Company’s predecessor entities. Verizon also objects to this request because it is overly broad, unduly burdensome and seeks information about rental and non-rental payments or non-payments that are not at issue in this proceeding, are not relevant or material to the subject matter of this proceeding, and are not reasonably calculated to lead to the discovery of admissible evidence about the just and reasonable rate for Verizon’s use of FirstEnergy’s poles under ten joint use agreements. Subject to and without waiver of its objections, Verizon will provide a response to this request to the extent it seeks information about Verizon’s non-payment of any invoice for pole attachment rent received from FE PA, Met-Ed, Penelec, and/or Penn Power since November 20, 2019 under the rate provision in any of the ten joint use agreements at issue in this case.

FE PA to VZ-IV-19:

Is Verizon aware of any other ILECs with attachments on FE PA’s poles that have failed to remit payment to FE PA for as long as Verizon? If so, please identify each such ILEC.

Objections:

Verizon objects to this request because it is overly broad, unduly burdensome and seeks information about entities that are not party to this proceeding and about matters that are not relevant or material to the subject matter of this proceeding, and are not reasonably calculated to lead to the discovery of admissible evidence about the just and reasonable rate for Verizon’s use of FirstEnergy’s poles calculated using FirstEnergy’s pole costs. Verizon will not answer this request.

FE PA to VZ-IV-20:

Is Verizon aware of any CLECs with attachments on FE PA’s poles that have failed to remit payment to FE PA for as long as Verizon? If so, please identify each such CLEC.

Objections:

Verizon objects to this request because it is overly broad, unduly burdensome and seeks information about entities that are not party to this proceeding and about matters that are not relevant or material to the subject matter of this proceeding, and are not reasonably calculated to lead to the discovery of admissible evidence about the just and reasonable rate for Verizon’s use of FirstEnergy’s poles calculated using FirstEnergy’s pole costs. Verizon will not answer this request.

FE PA to VZ-IV-21:

Is Verizon aware of any cable companies with attachments on FE PA's poles that have failed to remit payment to FE PA for as long as Verizon? If so, please identify each such cable company.

Objections:

Verizon objects to this request because it is overly broad, unduly burdensome and seeks information about entities that are not party to this proceeding and about matters that are not relevant or material to the subject matter of this proceeding, and are not reasonably calculated to lead to the discovery of admissible evidence about the just and reasonable rate for Verizon's use of FirstEnergy's poles calculated using FirstEnergy's pole costs. Verizon will not answer this request.

FE PA to VZ-IV-22:

Does Verizon agree that FE PA needs Verizon to provide AUS Telephone Plant Index data to FE PA so that Verizon can be invoiced for its attachments to the Met-Ed and Penelec Rate Divisions' poles under the Joint Use Agreements? If not, please explain in detail why and provide all non-privileged Documents relied upon in reaching that conclusion and responding to this interrogatory.

Objections:

Verizon objects to this request because "Joint Use Agreements" and "Met-Ed and Penelec Rate Divisions" are undefined and ambiguous terms, it is unclear which joint use agreements this request refers to, and Verizon is not aware which, if any, poles are owned by the Met-Ed and Penelec Rate Divisions and does not have access to FirstEnergy's internal determination of the exact boundary lines of the Met-Ed and Penelec Rate Divisions. Verizon also objects to this request because it is overly broad, unduly burdensome and seeks information that is not relevant or material to the subject matter of this proceeding, and is not reasonably calculated to lead to the discovery of admissible evidence about the just and reasonable rate for Verizon's use of FirstEnergy's poles under ten joint use agreements. Subject to and without waiver of these objections, Verizon will provide a response to this request that assumes it refers to any the joint use agreements with Met-Ed and Penelec that are at issue in this case.

FE PA to VZ-IV-23:

Please state on which date Verizon last provided the AUS Telephone Plant Index data to FE PA and any of its predecessor entities and explain in detail why Verizon has refused to provide the data since that date.

Objections:

Verizon objects to this request because it is overly broad, unduly burdensome and seeks information that is not relevant or material to the subject matter of this proceeding, and is not

reasonably calculated to lead to the discovery of admissible evidence about the just and reasonable rate for Verizon's use of FirstEnergy's poles calculated using FirstEnergy's pole costs. Verizon also objects to this request to the extent that it implies Verizon refused to provide the data. Subject to and without waiver of these objections, Verizon will provide a response to this request.

FE PA to VZ-IV-24:

Reference the "2020 AUS.pdf" provided in the response to VZ to FE PA Set IV, No. 2 (CONFIDENTIAL). Please provide the equivalent document for each of the following years: 2021, 2022, 2023, 2024, and 2025.

Objections:

Verizon objects to this request to the extent it seeks information that is not in Verizon's possession and/or is equally available to FirstEnergy. Subject to and without waiver of these objections, Verizon is currently investigating the availability of this information and will provide a response to this request if it has a copy of such information or will indicate if it does not.

FE PA to VZ-IV-25:

Has Verizon performed any calculation of the amount it currently owes FE PA under the Joint Use Agreement, as offset by the refund requested by Verizon back to November 20, 2015? If so, please provide such calculation and all non-privileged Documents, workpapers, and analyses relied upon by Verizon to perform any such calculation.

Objections:

Verizon objects to this request because "Joint Use Agreement" is an undefined term and it is unclear which joint use agreement this request refers to. Verizon also objects to this request to the extent it implies that Verizon currently owes FE PA any sum under the ten joint use agreements at issue in this case. Verizon further objects to this request because it is overly broad, unduly burdensome and seeks information about non-rental amounts that are not at issue in this proceeding, are not relevant or material to the subject matter of this proceeding, and are not reasonably calculated to lead to the discovery of admissible evidence about the just and reasonable rate for Verizon's use of FirstEnergy's poles under ten joint use agreements. Verizon also objects to this request to the extent it seeks privileged information, drafts of testimony or exhibits, publicly available information, calculations that have already been served on FirstEnergy, and/or calculations that Verizon has not yet served pursuant to the procedural schedule. Subject to and without waiver of its objections, Verizon will provide a response to this request that assumes it refers to any of the ten joint use agreements at issue in this case.

FE PA to VZ-IV-26:

Has Verizon performed any calculation of the amount it currently owes FE PA under the Joint

Use Agreement, as offset by the refund requested by Verizon as limited to the refund period beginning November 20, 2019? If so, please provide such calculation and all non-privileged Documents, workpapers, and analyses relied upon by Verizon to perform any such calculation.

Objections:

Verizon objects to this request because “Joint Use Agreement” is an undefined term and it is unclear which joint use agreement this request refers to. Verizon also objects to this request to the extent it implies that Verizon currently owes FE PA any sum under the ten joint use agreements at issue in this case. Verizon further objects to this request because it is overly broad, unduly burdensome and seeks information about non-rental amounts that are not at issue in this proceeding, are not relevant or material to the subject matter of this proceeding, and are not reasonably calculated to lead to the discovery of admissible evidence about the just and reasonable rate for Verizon’s use of FirstEnergy’s poles under ten joint use agreements. Verizon also objects to this request to the extent it seeks privileged information, drafts of testimony or exhibits, publicly available information, calculations that have already been served on FirstEnergy, and/or calculations that Verizon has not yet served pursuant to the procedural schedule. Subject to and without waiver of its objections, Verizon will provide a response to this request that assumes it refers to any of the ten joint use agreements at issue in this case.

FE PA to VZ-IV-27:

Has Verizon performed any calculation of the amount it owes to FE PA under the Joint Use Agreements to date without the refund requested by Verizon? If so, please provide such calculation and all non-privileged Documents, workpapers, and analyses relied upon by Verizon to perform any such calculation.

Objections:

Verizon objects to this request because “Joint Use Agreements” is an undefined term and it is unclear which joint use agreements this request refers to. Verizon also objects to this request to the extent it implies that Verizon currently owes FE PA any sum under the ten joint use agreements at issue in this case. Verizon further objects to this request because it is overly broad, unduly burdensome and seeks information about non-rental amounts that are not at issue in this proceeding, are not relevant or material to the subject matter of this proceeding, and are not reasonably calculated to lead to the discovery of admissible evidence about the just and reasonable rate for Verizon’s use of FirstEnergy’s poles under ten joint use agreements. Verizon also objects to this request to the extent it seeks privileged information, drafts of testimony or exhibits, publicly available information, calculations that have already been served on FirstEnergy, and/or calculations that Verizon has not yet served pursuant to the procedural schedule. Subject to and without waiver of its objections, Verizon will provide a response to this request that assumes it refers to any of the ten joint use agreements at issue in this case.

FE PA to VZ-IV-28:

Please identify and provide all non-privileged Documents concerning Verizon's view of the potential impact of this Litigation, including the potential impact of the relief sought by this Litigation on: (1) the rates FE PA charges its customers; and (2) Verizon's efforts to provide or expand broadband service.

Objections:

Verizon objects to this request because it seeks analyses and drafts of testimony or exhibits that have already been served on FirstEnergy and/or have not yet been served pursuant to the procedural schedule. Subject to and without waiver of its objections, Verizon will provide a response to this request.

FE PA to VZ-IV-29:

- (a) Please provide Verizon Pennsylvania's annual budget for capital investments in broadband infrastructure in Pennsylvania for each of the following years: 2020, 2021, 2022, 2023, 2024, and 2025. Please provide all non-privileged Documents relied upon in answering this discovery request.
- (b) Please provide Verizon Pennsylvania's actual expenditures for capital investments in broadband infrastructure in Pennsylvania for each of the following years: 2020, 2021, 2022, 2023, 2024, and 2025. Please provide all non-privileged Documents relied upon in answering this discovery request.
- (c) Please provide Verizon Pennsylvania's annual budget for capital investments in broadband infrastructure in Pennsylvania for each of the following years: 2026, 2027, and 2028. Please provide all non-privileged Documents relied upon in answering this discovery request.

Objections:

Verizon objects to this request because "annual budget" is an undefined term and the request is overly broad, unduly burdensome and seeks information that is neither relevant nor material to the subject matter of this proceeding nor reasonably calculated to lead to the discovery of admissible evidence about the just and reasonable rate for Verizon's use of FirstEnergy's poles calculated using FirstEnergy's pole costs. Verizon also objects to this request to the extent it requires the creation or compilation of data or information that Verizon does not maintain in the format requested or in the normal course of business and Verizon is not required under the Commission's discovery rules to make a special study or analysis to attempt to compile this information. Verizon will respond to this request only to verify that, to the extent it understands the question, it does not track this information.

FE PA to VZ-IV-30:

- (a) Please provide Verizon North’s annual budget for capital investments in broadband infrastructure in Pennsylvania for each of the following years: 2020, 2021, 2022, 2023, 2024, and 2025. Please provide all non-privileged Documents relied upon in answering this discovery request.
- (b) Please provide Verizon North’s actual expenditures for capital investments in broadband infrastructure in Pennsylvania for each of the following years: 2020, 2021, 2022, 2023, 2024, and 2025. Please provide all non-privileged Documents relied upon in answering this discovery request.
- (c) Please provide Verizon North’s annual budget for capital investments in broadband infrastructure in Pennsylvania for each of the following years: 2026, 2027, and 2028. Please provide all non-privileged Documents relied upon in answering this discovery request.

Objections:

Verizon objects to this request because “annual budget” is an undefined term and the request is overly broad, unduly burdensome and seeks information that is neither relevant nor material to the subject matter of this proceeding nor reasonably calculated to lead to the discovery of admissible evidence about the just and reasonable rate for Verizon’s use of FirstEnergy’s poles calculated using FirstEnergy’s pole costs. Verizon also objects to this request to the extent it requires the creation or compilation of data or information that Verizon does not maintain in the format requested or in the normal course of business and Verizon is not required under the Commission’s discovery rules to make a special study or analysis to attempt to compile this information. Verizon will respond to this request only to verify that, to the extent it understands the question, it does not track this information.

FE PA to VZ-IV-31:

- (a) Please state whether and to what extent Verizon Pennsylvania’s annual budgets provided in response to FE PA to VZ-IV-29(a) changed due to the Commission’s Final Order entered on December 18, 2020. Please provide all non-privileged Documents relied upon in answering this discovery request.
- (b) Please state whether and to what extent Verizon Pennsylvania’s actual expenditures provided in response to FE PA to VZ-IV-29(b) changed due to the Commission’s Final Order entered on December 18, 2020. Please provide all non-privileged Documents relied upon in answering this discovery request.
- (c) Please state whether and to what extent Verizon Pennsylvania’s annual budgets provided in response to FE PA to VZ-IV-29(c) would change if Verizon were to obtain its requested relief in this Litigation. Please provide all non-privileged Documents relied upon in answering this discovery request.

Objections:

Verizon objects to this request because “annual budgets” is an undefined term and the request is overly broad, unduly burdensome and seeks information that is neither relevant nor material to the subject matter of this proceeding nor reasonably calculated to lead to the discovery of admissible evidence about the just and reasonable rate for Verizon’s use of FirstEnergy’s poles calculated using FirstEnergy’s pole costs. Verizon also objects to this request to the extent it requires the creation or compilation of data or information that Verizon does not maintain in the format requested or in the normal course of business and Verizon is not required under the Commission’s discovery rules to make a special study or analysis to attempt to compile this information. Verizon will respond to this request only to verify that, to the extent it understands the question, it does not track the information sought in response to FE PA to VZ-IV-29, which makes it impossible to respond to this request.

FE PA to VZ-IV-32:

- (a) Please state whether and to what extent Verizon North’s annual budgets provided in response to FE PA to VZ-IV-30(a) changed due to the Commission’s Final Order entered on December 18, 2020. Please provide all non-privileged Documents relied upon in answering this discovery request.
- (b) Please state whether and to what extent Verizon North’s actual expenditures provided in response to FE PA to VZ-IV-30(b) changed due to the Commission’s Final Order entered on December 18, 2020. Please provide all non-privileged Documents relied upon in answering this discovery request.
- (c) Please state whether and to what extent Verizon North’s annual budgets provided in response to FE PA to VZ-IV-30(c) would change if Verizon were to obtain its requested relief in this Litigation. Please provide all non-privileged Documents relied upon in answering this discovery request.

Objections:

Verizon objects to this request because “annual budgets” is an undefined term and the request is overly broad, unduly burdensome and seeks information that is neither relevant nor material to the subject matter of this proceeding nor reasonably calculated to lead to the discovery of admissible evidence about the just and reasonable rate for Verizon’s use of FirstEnergy’s poles calculated using FirstEnergy’s pole costs. Verizon also objects to this request to the extent it requires the creation or compilation of data or information that Verizon does not maintain in the format requested or in the normal course of business and Verizon is not required under the Commission’s discovery rules to make a special study or analysis to attempt to compile this information. Verizon will respond to this request only to verify that, to the extent it understands the question, it does not track the information sought in response to FE PA to VZ-IV-30, which makes it impossible to respond to this request.

FE PA to VZ-IV-33:

Please reference “Shapiro Administration Plan to Drive Out More Than \$711 Million to Connect Every Pennsylvanian to High-Speed Internet Approved by NTIA,” COMMONWEALTH OF PENNSYLVANIA (Apr. 29, 2026), *available at* <https://www.pa.gov/governor/newsroom/2026-press-releases/shapiro-administration-plans--711-million-investment-on-high-spe> (“BEAD Press Release”).

- (a) Please state whether Verizon agrees with the BEAD Press Release issued by Governor Josh Shapiro’s Press Office that the Broadband Equity, Access, and Deployment (“BEAD”) grants will “connect the remaining locations across the Commonwealth currently lacking high-speed internet service.” If the answer is anything other than an unqualified “Yes,” please explain in detail Verizon’s position and provide all non-privileged Documents relied upon in reaching that conclusion and in answering this discovery request.
- (b) How much of the “\$204 million” that the PBDA has invested “through the Broadband Infrastructure Program” was for Verizon projects?
- (c) Please provide all non-privileged Documents concerning any of the “\$204 million” that the PBDA has invested “through the Broadband Infrastructure Program” for Verizon projects.
- (d) Please provide Verizon’s estimate, if any, of the additional investment that Verizon needs to “connect the remaining locations across the Commonwealth currently lacking high-speed internet service” after accounting for the BEAD grants that have been awarded. Please also provide all non-privileged Documents relied upon in calculating that estimate.
- (e) Please provide Verizon’s estimate, if any, of the additional investment that Verizon needs to “connect the remaining locations” in each of FE PA’s Rate Divisions’ service territories (as described on Page Nos. 6-20 in the Company’s Commission-approved Retail Tariff, available at <https://www.firstenergycorp.com/content/dam/customer/Customer%20Choice/Files/PA/tariffs/fe-pa-retail-tariff-4-1-26.pdf>) that are “currently lacking high-speed internet service” after accounting for the BEAD grants that have been awarded. Please also provide all non-privileged Documents relied upon in calculating those estimates.

Objections:

Verizon objects to this request because it is overly broad, unduly burdensome and seeks information that is neither relevant nor material to the subject matter of this proceeding nor reasonably calculated to lead to the discovery of admissible evidence about the just and reasonable rate for Verizon’s use of FirstEnergy’s poles calculated using FirstEnergy’s pole costs. Verizon further objects to this request because the cited Retail Tariff does not provide sufficient information to answer the request. Verizon also objects to this request because it presumes that Verizon was the only grant awardee under the BEAD program or that Verizon

alone would be connecting all of the unserved locations in the Commonwealth and therefore is not answerable. Verizon also objects to this request to the extent it requires the creation or compilation of data or information that Verizon does not maintain in the format requested or in the normal course of business and Verizon is not required under the Commission's discovery rules to make a special study or analysis to attempt to compile this information. Verizon will respond to this request only with references to publicly available information provided by the Commonwealth of Pennsylvania.

FE PA to VZ-IV-34:

Please reference "Pennsylvania Broadband, Equity, Access and Deployment (BEAD) Program," PENNSYLVANIA BROADBAND DEPLOYMENT AUTHORITY, *available at* https://broadband.pa.gov/wp-content/uploads/2026/04/BEAD-Provisional-Grantee-Approval-List_4-27-26.pdf.

Please provide all non-privileged Documents concerning Verizon's applications for grants under the BEAD program, including, but not limited to, the BEAD grant applications submitted by or on behalf of Verizon.

Objections:

Verizon objects to this request because it is overly broad, unduly burdensome and seeks information that is neither relevant nor material to the subject matter of this proceeding nor reasonably calculated to lead to the discovery of admissible evidence about the just and reasonable rate for Verizon's use of FirstEnergy's poles calculated using FirstEnergy's pole costs. Verizon will respond to this request only with references to publicly available information provided by the Commonwealth of Pennsylvania.

FE PA to VZ-IV-35:

Please reference "Pennsylvania Broadband, Equity, Access and Deployment (BEAD) Program," PENNSYLVANIA BROADBAND DEPLOYMENT AUTHORITY, *available at* https://broadband.pa.gov/wp-content/uploads/2026/04/BEAD-Provisional-Grantee-Approval-List_4-27-26.pdf.

- (a) Of the 14,297 locations for which Verizon has been approved to receive grants totaling \$108,804,695, how many of those locations are in the service territory of FE PA's Met-Ed Rate Division (as described on Page Nos. 6-20 in the Company's Commission-approved Retail Tariff, available at <https://www.firstenergycorp.com/content/dam/customer/Customer%20Choice/Files/PA/tariffs/fe-pa-retail-tariff-4-1-26.pdf>)?
- (b) Of the locations identified in response to subpart (a), how many will rely on FE PA Met-Ed Rate Division poles to receive service from Verizon?

- (c) Of the \$108,804,695 in grants for which Verizon has been approved, how much of those grants would be utilized for projects located in the service territory of FE PA's Met-Ed Rate Division (as described on Page Nos. 6-20 in the Company's Commission-approved Retail Tariff, available at <https://www.firstenergycorp.com/content/dam/customer/Customer%20Choice/Files/PA/tariffs/fe-pa-retail-tariff-4-1-26.pdf>)?
- (d) Of the 14,297 locations for which Verizon has been approved to receive grants totaling \$108,804,695, how many of those locations are in the service territory of FE PA's Penelec Rate Division (as described on Page Nos. 6-20 in the Company's Commission-approved Retail Tariff, available at <https://www.firstenergycorp.com/content/dam/customer/Customer%20Choice/Files/PA/tariffs/fe-pa-retail-tariff-4-1-26.pdf>)?
- (e) Of the locations identified in response to subpart (d), how many will rely on FE PA Penelec Rate Division poles to receive service from Verizon?
- (f) Of the \$108,804,695 in grants for which Verizon has been approved, how much of those grants would be utilized for projects located in the service territory of FE PA's Penelec Division (as described on Page Nos. 6-20 in the Company's Commission-approved Retail Tariff, available at <https://www.firstenergycorp.com/content/dam/customer/Customer%20Choice/Files/PA/tariffs/fe-pa-retail-tariff-4-1-26.pdf>)?
- (g) Of the 14,297 locations for which Verizon has been approved to receive grants totaling \$108,804,695, how many of those locations are in the service territory of FE PA's Penn Power Rate Division (as described on Page Nos. 6-20 in the Company's Commission-approved Retail Tariff, available at <https://www.firstenergycorp.com/content/dam/customer/Customer%20Choice/Files/PA/tariffs/fe-pa-retail-tariff-4-1-26.pdf>)?
- (h) Of the locations identified in response to subpart (g), how many will rely on FE PA Penn Power Rate Division poles to receive service from Verizon?
- (i) Of the \$108,804,695 in grants for which Verizon has been approved, how much of those grants would be utilized for projects located in the service territory of FE PA's Penn Power Rate Division (as described on Page Nos. 6-20 in the Company's Commission-approved Retail Tariff, available at <https://www.firstenergycorp.com/content/dam/customer/Customer%20Choice/Files/PA/tariffs/fe-pa-retail-tariff-4-1-26.pdf>)?
- (j) Of the 14,297 locations for which Verizon has been approved to receive grants totaling \$108,804,695, how many of those locations are in the service territory of FE PA's West Penn Rate Division (as described on Page Nos. 6-20 in the Company's Commission-approved Retail Tariff, available at <https://www.firstenergycorp.com/content/dam/customer/Customer%20Choice/Files/PA/tariffs/fe-pa-retail-tariff-4-1-26.pdf>)?

- (k) Of the locations identified in response to subpart (g), how many will rely on FE PA West Penn Rate Division poles to receive service from Verizon?
- (l) Of the \$108,804,695 in grants for which Verizon has been approved, how much of those grants would be utilized for projects located in the service territory of FE PA's West Penn Rate Division (as described on Page Nos. 6-20 in the Company's Commission-approved Retail Tariff, available at <https://www.firstenergycorp.com/content/dam/customer/Customer%20Choice/Files/PA/tariffs/fe-pa-retail-tariff-4-1-26.pdf>)?

Objections:

Verizon objects to this request because it is overly broad, unduly burdensome and seeks information that is neither relevant nor material to the subject matter of this proceeding nor reasonably calculated to lead to the discovery of admissible evidence about the just and reasonable rate for Verizon's use of FirstEnergy's poles calculated using FirstEnergy's pole costs. Verizon also objects to this request because "FE PA Met-Ed Rate Division poles," "FE PA Penelec Rate Division poles," "FE PA Penn Power Rate Division poles," and "FE PA West Penn Rate Division poles" are undefined terms and may seek information about poles in such Rate Divisions that are owned by other entities not party to this case. In addition, Verizon is not aware which, if any, poles are owned by the Met-Ed Rate Division, Penelec Rate Division, Penn Power Rate Division, or West Penn Rate Division. Verizon further objects to this request because the cited Retail Tariff does not provide sufficient information to answer the request. Verizon also objects to this request to the extent it requires the creation or compilation of data or information that Verizon does not maintain in the format requested or in the normal course of business and Verizon is not required under the Commission's discovery rules to make a special study or analysis to attempt to compile this information. Verizon will not respond to this request but notes that First Energy may conduct its own special study using the PBDA's broadband map, which is available at <https://experience.arcgis.com/experience/7cafb0b5d9444eb18d0873c8afaafb86/>

FE PA to VZ-IV-36:

For each year beginning with 2020, provide the New Telecom Rate for a communications provider's use of one foot of space on: (1) Verizon Pennsylvania's poles; and (b) Verizon North's poles. In answering this question, provide for each New Telecom Rate the calculation performed by Verizon 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 Verizon has not calculated a New Telecom Rate, provide all inputs and identify all source data required to calculate the rate. Provide all non-privileged Documents concerning all calculations and inputs, including all source data, if they are not publicly available. Separately present the information for poles owned by Verizon Pennsylvania and Verizon North.

Objections:

Verizon objects to this request because it is overly broad, unduly burdensome and seeks information that is neither relevant nor material to the subject matter of this proceeding nor reasonably calculated to lead to the discovery of admissible evidence about the just and

reasonable rate for Verizon's use of FirstEnergy's poles calculated using FirstEnergy's pole costs. Verizon further objects to this request to the extent it implies that Verizon calculates a different New Telecom Rate for use of Verizon Pennsylvania poles and Verizon North poles. Verizon will not respond to this request.

FE PA to VZ-IV-37:

For each year beginning with 2020, please provide:

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

In answering this question, provide for each rental or deficiency rate Verizon'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 Verizon has not calculated the rental or deficiency rate that it contends applies to Verizon's use of FE PA's or its predecessors' poles and/or the rental rate that Verizon contends applies to FE PA's or its predecessors' 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 non-privileged 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 FE PA's Met-Ed, Penelec, Penn Power, and West Penn Rate Divisions.

Objections:

Verizon objects to this request because "FE PA's Met-Ed, Penelec, Penn Power, and West Penn Rate Divisions" is an undefined term and Verizon is not aware which, if any, poles are owned by FE PA's Met-Ed, Penelec, Penn Power, and West Penn Rate Divisions and does not have access to FirstEnergy's internal determination of the exact boundary lines of the Met-Ed, Penelec, Penn Power, and West Penn Rate Divisions. Verizon also objects to this request to the extent it seeks testimony or exhibits, or drafts of testimony or exhibits, prior to their service under the

procedural schedule. Subject to and without waiver of its objections, Verizon is currently investigating the availability of the requested data and will provide a response if it maintains such data in the format requested without undertaking a special study, or it will verify if it does not do so.

FE PA to VZ-IV-38:

Please identify and provide all non-privileged internal communications, memoranda, analyses, reports, documents, and presentations concerning FirstEnergy's assessment, at any time since July 12, 2011, of whether the pole attachment rates charged to Verizon under the Joint Use Agreements were consistent with the New Telecom Rate, the just and reasonable rate standard under 47 U.S.C. § 224(b)(1), the just and reasonable rate standard under the Pennsylvania Public Utility Code, 66 Pa. C.S. § 1301(a), the non-discriminatory rate standard under the Pennsylvania Public Utility Code, 66 Pa. C.S. § 1304, the Pennsylvania Public Utility Commission's pole attachment regulations, 52 Pa. Code §§ 77.1-77.7, the FCC's 2011 *Pole Attachment Order*, and/or the FCC's 2018 *Third Report and Order*, including any analyses of the financial impact of adjusting those rates.

Objections:

Verizon objects to this request because it asks Verizon to speculate about FirstEnergy's assessment of these issues, and so is impossible to answer. Verizon also objects to this request because it seeks drafts of testimony or exhibits, information already in FirstEnergy's possession, and analyses Verizon has not yet prepared and/or served pursuant to the procedural schedule.

FE PA to VZ-IV-39:

For each year beginning with 2009, please identify all entities that had a Pole Attachment Agreement with Verizon state whether the entity was an electric utility, 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 Verizon charged or was charged by the entity, (c) the rate and/or amount that Verizon collected from or paid to 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 Verizon collected from or paid to the entity and, if applicable, (f) the rate and/or amount that applied to Verizon's or the entity's use of the poles, (g) the number of Verizon's poles used by the entity or the number of the entity's poles used by Verizon, and (h) the total net rental amount collected from or paid to the entity. Provide all non-privileged Documents concerning Verizon's response to this discovery request, including all source data and workpapers. Separately present the information for poles owned by Verizon Pennsylvania and Verizon North.

Objections:

Verizon objects to this request because it is overly broad, unduly burdensome and seeks information about pole attachment rates that are not at issue in this proceeding, are not relevant or material to the subject matter of this proceeding, and are not reasonably calculated to lead to the discovery of admissible evidence about the just and reasonable rate for Verizon’s use of FirstEnergy’s poles calculated using FirstEnergy’s pole costs. Verizon further objects to this request to the extent it seeks competitively sensitive and confidential information about entities that are not a party to this case, not regulated by the Commission and/or whose rates are not the subject of this proceeding or any other pending complaint proceeding before the Commission. ALJ Cheskis held that “discovery is not permitted if it relates to a matter which is privileged and the matter is privileged if it is confidential to another entity.” Order at 6 (May 11, 2020). As with FirstEnergy’s prior discovery request, the other entities, including other electric utilities, “whose information would be part of the answer” to this request “are not subject to the protective [agreement] in place in this proceeding.” *Id.* Verizon also objects to this request to the extent it requires the compilation of data or information that Verizon does not maintain in the format requested or in the normal course of business. Verizon will not respond to this request.

FE PA to VZ-IV-40:

For each year beginning with 2020, please describe in detail the method or formula Verizon used to calculate the pole attachment rate(s) it charged cable companies and CLECs. For each pole attachment rate charged, provide Verizon’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 discovery request differs from the rate identified in response to FE PA to VZ-IV-36 for the same pole owner and same year, describe in detail the reason for the difference. Provide all non-privileged Documents concerning all calculations and inputs, including all source data, if they are not publicly available. Separately present the information for poles owned by Verizon Pennsylvania and Verizon North.

Objections:

Verizon objects to this request because it is overly broad, unduly burdensome and seeks information about pole attachment rates that are not at issue in this proceeding, are not relevant or material to the subject matter of this proceeding, and are not reasonably calculated to lead to the discovery of admissible evidence about the just and reasonable rate for Verizon’s use of FirstEnergy’s poles calculated using FirstEnergy’s pole costs. Verizon will not respond to this request.

FE PA to VZ-IV-41:

Please provide Verizon Pennsylvania’s Pole Attachment Agreements.

Objections:

Verizon objects to this request because it is overly broad, unduly burdensome and seeks information about pole attachment rates that are not at issue in this proceeding, are not relevant or material to the subject matter of this proceeding, and are not reasonably calculated to lead to the discovery of admissible evidence about the just and reasonable rate for Verizon’s use of FirstEnergy’s poles calculated using FirstEnergy’s pole costs. Verizon further objects to this request to the extent it seeks competitively sensitive and confidential information about entities that are not a party to this case, not regulated by the Commission and/or whose rates are not the subject of this proceeding or any other pending complaint proceeding before the Commission. ALJ Cheskis held that “discovery is not permitted if it relates to a matter which is privileged and the matter is privileged if it is confidential to another entity.” Order at 6 (May 11, 2020). As with FirstEnergy’s prior discovery request, the other companies, including other electric utilities, “whose information would be part of the answer” to this request “are not subject to the protective [agreement] in place in this proceeding.” *Id.* Verizon will not respond to this request.

FE PA to VZ-IV-42:

Please provide Verizon North’s Pole Attachment Agreements.

Objections:

Verizon objects to this request because it is overly broad, unduly burdensome and seeks information about pole attachment rates that are not at issue in this proceeding, are not relevant or material to the subject matter of this proceeding, and are not reasonably calculated to lead to the discovery of admissible evidence about the just and reasonable rate for Verizon’s use of FirstEnergy’s poles calculated using FirstEnergy’s pole costs. Verizon further objects to this request to the extent it seeks competitively sensitive and confidential information about entities that are not a party to this case, not regulated by the Commission and/or whose rates are not the subject of this proceeding or any other pending complaint proceeding before the Commission. ALJ Cheskis held that “discovery is not permitted if it relates to a matter which is privileged and the matter is privileged if it is confidential to another entity.” Order at 6 (May 11, 2020). As with FirstEnergy’s prior discovery request, the other companies, including other electric utilities, “whose information would be part of the answer” to this request “are not subject to the protective [agreement] in place in this proceeding.” *Id.* Verizon will not respond to this request.

FE PA to VZ-IV-43:

Within two business days of the service of Verizon’s Supplemental Testimony in this proceeding, please identify and provide all non-privileged Documents, workpapers, reports, and analyses that Verizon’s witnesses considered or relied upon in preparing such Supplemental Testimony.

Objections:

Verizon objects to this request to the extent it seeks drafts of testimony or exhibits, publicly available information, and information already in FirstEnergy’s possession. Subject to and without waiver of its objections, Verizon will respond to this request within two business days of service of Verizon’s Supplemental Testimony.

FE PA to VZ-IV-44:

Please provide all non-privileged Documents, workpapers, and analyses concerning any audits of Verizon’s poles that Verizon has performed from 2015 to present.

Objections:

Verizon objects to this request because “audit” is an ambiguous term. Verizon also objects to this request because it is overly broad, unduly burdensome, and seeks information about Verizon’s poles that is not relevant or material to the subject matter of this proceeding, and not reasonably calculated to lead to the discovery of admissible evidence about the just and reasonable rate for Verizon’s use of FirstEnergy’s poles calculated using FirstEnergy’s pole costs. Verizon further objects to this request because it is overly broad, unduly burdensome, and seeks information about (1) poles that FirstEnergy does not use in the parties’ overlapping service areas and (2) poles in service areas where FirstEnergy does not provide service, neither of which is relevant or material to the subject matter of this proceeding, or reasonably calculated to lead to the discovery of admissible evidence. Verizon will not respond to this request.

FE PA to VZ-IV-45:

Please describe the timing and of costs incurred by Verizon to replace Verizon-owned poles that have failed inspection. Please produce all non-privileged Documents relied upon in responding to this request.

Objections:

Verizon objects to this request because “failed inspection” is an ambiguous and undefined term and because it is overly broad, unduly burdensome, and seeks information about Verizon’s poles that is not relevant or material to the subject matter of this proceeding, and not reasonably calculated to lead to the discovery of admissible evidence about the just and reasonable rate for Verizon’s use of FirstEnergy’s poles calculated using FirstEnergy’s pole costs. Verizon further objects to this request because it is overly broad, unduly burdensome, and seeks information about (1) poles that FirstEnergy does not use in the parties’ overlapping service areas and (2) poles in service areas where FirstEnergy does not provide service, neither of which is relevant or material to the subject matter of this proceeding, or reasonably calculated to lead to the discovery of admissible evidence. Verizon further objects to this request because it requires the compilation of data or information that Verizon does not maintain in the format requested or in the normal course of business and Verizon is not required under the Commission’s discovery

rules to make a special study or analysis to attempt to compile this information. Verizon will not respond to this request.

FE PA to VZ-IV-46:

Please describe the timing of and costs incurred by Verizon to replace Verizon-owned poles that have been damaged due to car accidents. Please produce all non-privileged Documents relied upon in responding to this request.

Objections:

Verizon objects to this request because it is overly broad, unduly burdensome, and seeks information about Verizon's poles that is not relevant or material to the subject matter of this proceeding, and not reasonably calculated to lead to the discovery of admissible evidence about the just and reasonable rate for Verizon's use of FirstEnergy's poles calculated using FirstEnergy's pole costs. Verizon further objects to this request because it is overly broad, unduly burdensome, and seeks information about (1) poles that FirstEnergy does not use in the parties' overlapping service areas and (2) poles in service areas where FirstEnergy does not provide service, neither of which is relevant or material to the subject matter of this proceeding, or reasonably calculated to lead to the discovery of admissible evidence. Verizon further objects to this request because it requires the compilation of data or information that Verizon does not maintain in the format requested or in the normal course of business and Verizon is not required under the Commission's discovery rules to make a special study or analysis to attempt to compile this information. Verizon will not respond to this request.

FE PA to VZ-IV-47:

Please describe the timing of and costs incurred by Verizon to replace Verizon-owned poles that have been damaged due to storms. Please produce all non-privileged Documents relied upon in responding to this request.

Objections:

Verizon objects to this request because it is overly broad, unduly burdensome, and seeks information about Verizon's poles that is not relevant or material to the subject matter of this proceeding, and not reasonably calculated to lead to the discovery of admissible evidence about the just and reasonable rate for Verizon's use of FirstEnergy's poles calculated using FirstEnergy's pole costs. Verizon further objects to this request because it is overly broad, unduly burdensome, and seeks information about (1) poles that FirstEnergy does not use in the parties' overlapping service areas and (2) poles in service areas where FirstEnergy does not provide service, neither of which is relevant or material to the subject matter of this proceeding, or reasonably calculated to lead to the discovery of admissible evidence. Verizon further objects to this request because it requires the compilation of data or information that Verizon does not maintain in the format requested or in the normal course of business and Verizon is not required under the Commission's discovery rules to make a special study or analysis to attempt to compile this information. Verizon will not respond to this request.

FE PA to VZ-IV-48:

From 2015 to present, please identify all Verizon-owned poles carrying FE PA facilities that were replaced by Verizon due to a car accident. In the response, please provide, for each incident, the pole number, the pole location, the date of the accident, the date of replacement, and the costs incurred by Verizon associated with the replacement. Please produce all non-privileged Documents relied upon in responding to this request.

Objections:

Verizon objects to this request because it is overly broad, unduly burdensome and seeks information about Verizon's poles that is not relevant or material to the subject matter of this proceeding, and not reasonably calculated to lead to the discovery of admissible evidence about the just and reasonable rate for Verizon's use of FirstEnergy's poles calculated using FirstEnergy's pole costs under ten joint use agreements. Verizon further objects to the request to the extent it requests information already in FirstEnergy's possession and because it requires the compilation of data or information that Verizon does not maintain in the format requested or in the normal course of business and Verizon is not required under the Commission's discovery rules to make a special study or analysis to attempt to compile this information. Verizon will not respond to this request.

FE PA to VZ-IV-49:

From 2015 to present, please identify all Verizon-owned poles carrying FE PA facilities that were replaced by Verizon due to a storm. In the response, please provide, for each incident, the pole number, the pole location, the date of the storm, the date of replacement, and the costs incurred by Verizon associated with the replacement. Please produce all non-privileged Documents relied upon in responding to this request.

Objections:

Verizon objects to this request because it is overly broad, unduly burdensome and seeks information about Verizon's poles that is not relevant or material to the subject matter of this proceeding, and not reasonably calculated to lead to the discovery of admissible evidence about the just and reasonable rate for Verizon's use of FirstEnergy's poles calculated using FirstEnergy's pole costs under ten joint use agreements. Verizon further objects to this request to the request to the extent it requests information already in FirstEnergy's possession and because it requires the compilation of data or information that Verizon does not maintain in the format requested or in the normal course of business and Verizon is not required under the Commission's discovery rules to make a special study or analysis to attempt to compile this information. Verizon will not respond to this request.

FE PA to VZ-IV-50:

From 2015 to present, please identify all Verizon-owned poles carrying FE PA facilities that were replaced by FE PA, for which Verizon fully reimbursed FE PA. In the response, please

provide, for each instance, the pole number, the pole location, the date of notification of the incident requiring replacement, and the date of replacement. Please produce all non-privileged Documents relied upon in responding to this request.

Objections:

Verizon objects to this request because it is overly broad, unduly burdensome and seeks information about Verizon's poles that is not relevant or material to the subject matter of this proceeding, and not reasonably calculated to lead to the discovery of admissible evidence about the just and reasonable rate for Verizon's use of FirstEnergy's poles calculated using FirstEnergy's pole costs under ten joint use agreements. Verizon further objects to this request to the extent it requests information already in FirstEnergy's possession and because it requires the compilation of data or information that Verizon does not maintain in the format requested or in the normal course of business and Verizon is not required under the Commission's discovery rules to make a special study or analysis to attempt to compile this information. Verizon will not respond to this request.

FE PA to VZ-IV-51:

Please state whether Verizon has installed more than one communications line on any poles subject to its Joint Use Agreements with FE PA and any of FE PA's predecessors since 2015. If so, please provide, for each instance, the pole number, pole location, and the year the additional communication line(s) were installed. Please produce all non-privileged Documents relied upon in responding to this request. Verizon will not respond to this request.

Objections:

Verizon objects to this request because it is vague and ambiguous, "Joint Use Agreements" is an undefined term, and it is unclear which joint use agreements this request refers to. Verizon also objects to this request because it is overly broad, unduly burdensome and seeks information that is not relevant or material to the subject matter of this proceeding, and not reasonably calculated to lead to the discovery of admissible evidence about the just and reasonable rate for Verizon's use of FirstEnergy's poles under ten joint use agreements. Verizon further objects to this request to the extent it requests information already in FirstEnergy's possession and because it requires the compilation of data or information that Verizon does not maintain in the format requested or in the normal course of business and Verizon is not required under the Commission's discovery rules to make a special study or analysis to attempt to compile this information. Verizon will not respond to this request.

FE PA to VZ-IV-52:

- (a) Please provide the average amount of space occupied by Verizon's facilities on FE PA-owned poles subject to Verizon's Joint Use Agreements with FE PA's Met-Ed Rate Division. Please produce all non-privileged Documents relied upon in responding to this request.

- (b) Please provide the average amount of space occupied by Verizon’s facilities on FE PA-owned poles subject to Verizon’s Joint Use Agreements with FE PA’s Penelec Rate Division. Please produce all non-privileged Documents relied upon in responding to this request.
- (c) Please provide the average amount of space occupied by Verizon’s facilities on FE PA-owned poles subject to Verizon’s Joint Use Agreements with FE PA’s Penn Power Rate Division. Please produce all non-privileged Documents relied upon in responding to this request.

Objections:

Verizon objects to this request because “Met-Ed Rate Division,” “Penelec Rate Division,” and “Penn Power Rate Division” are undefined terms and Verizon does not have access to FirstEnergy’s internal determination of the exact boundary lines of the Met-Ed Rate Division, Penelec Rate Division, and Penn Power Rate Division. Verizon also objects to this request to the extent it seeks publicly available documents or documents already in FirstEnergy’s possession. Subject to and without waiver of its objections, Verizon will provide a response to this request.

FE PA to VZ-IV-53:

Please state whether Verizon still utilizes any copper wire facilities on FE PA-owned poles subject to Verizon’s Joint Use Agreements with FE PA. Please produce all non-privileged Documents relied upon in responding to this request.

Objections:

Verizon objects to this request because it is vague and ambiguous, “Joint Use Agreements” is an undefined term, and it is unclear which joint use agreements this request refers to. Verizon also objects to this request because it is overly broad, unduly burdensome and seeks information that is not relevant or material to the subject matter of this proceeding, and not reasonably calculated to lead to the discovery of admissible evidence about the just and reasonable rate for Verizon’s use of FirstEnergy’s poles based on FirstEnergy’s pole costs. Verizon further objects to this request because it requires the compilation of data or information that Verizon does not maintain in the format requested or in the normal course of business and Verizon is not required under the Commission’s discovery rules to make a special study or analysis to attempt to compile this information. Verizon will not respond to this request.

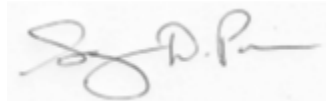
FE PA to VZ-IV-54:

Please state whether Verizon has deployed new or duplicative (non-replacement) facilities on FE PA-owned poles subject to Verizon’s FE PA ILEC agreements since 2015. If so, please provide, for each instance, the pole number, pole location, the year the additional facility or facilities were installed, and any associated make-ready costs paid by Verizon in conjunction with the installation of such facility or facilities. Please produce all non-privileged Documents relied upon in responding to this request.

Objections:

Verizon objects to this request because it is vague and ambiguous, “new or duplicative (non-replacement) facilities” and “FE PA ILEC Agreements” are undefined terms, and it is unclear which “FE PA ILEC Agreements” this request refers to. Verizon also objects to this request because it is overly broad, unduly burdensome and seeks information that is not relevant or material to the subject matter of this proceeding, and not reasonably calculated to lead to the discovery of admissible evidence about the just and reasonable rate for Verizon’s use of FirstEnergy’s poles under ten joint use agreements. Verizon further objects to this request to the extent it seeks information that is not within Verizon’s possession or control, and because it requires the compilation of data or information that Verizon does not maintain in the format requested or in the normal course of business and Verizon is not required under the Commission’s discovery rules to make a special study or analysis to attempt to compile this information. Verizon will not respond to this request.

Respectfully submitted,



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Counsel for Verizon Pennsylvania LLC and Verizon North LLC

Dated: May 20, 2026

VERIFICATION

I, Andy Bowen, Supervisor – Corporate Joint Use Contact of FirstEnergy Service Company, hereby state that the facts above set forth are true and correct to the best of my knowledge, information and belief and that I expect to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa. C.S. § 4904 (relating to unsworn falsification to authorities).

Date: June 5, 2026



Andy Bowen