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July 30, 2026

VIA eFILING

Matthew L. Homsher, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor
Harrisburg, PA 17120

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

Dear Secretary Homsher:

Enclosed for filing in the above-captioned proceeding is the **Unopposed Motion to Admit Interrogatory Verification and Disregard Rejoinder Testimony of FirstEnergy Pennsylvania Electric Company (the “Motion”)**.

The Motion will be served on the presiding Administrative Law Judges (“ALJs”) and all parties of record as indicated on the Certificate of Service.

If you have any questions, please do not hesitate to contact me. Thank you.

Very truly yours,



Kenneth M. Kulak

Per Certificate of Service (w/encls.)

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**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

PETITION OF FIRSTENERGY	:	
PENNSYLVANIA ELECTRIC	:	
COMPANY FOR APPROVAL OF ITS	:	DOCKET NO. P-2026-3060298
DEFAULT SERVICE PROGRAM FOR	:	
THE PERIOD FROM JUNE 1, 2027 TO	:	
MAY 31, 2031	:	

CERTIFICATE OF SERVICE

I hereby certify and affirm that I have on this day served copies of the **Unopposed Motion to Admit Interrogatory Verification and Disregard Rejoinder Testimony of FirstEnergy Pennsylvania Electric Company** on the persons listed below, in the manner specified in accordance with the requirements of 52 Pa. Code § 1.54:

VIA ELECTRONIC MAIL

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Dated: July 30, 2026

*Counsel for FirstEnergy Pennsylvania
Electric Company*

***=Executed Protective Order acknowledgement**

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

NOTICE TO PLEAD

YOU ARE HEREBY NOTIFIED that pursuant to 52 Pa. Code § 5.103(b), an Answer must be filed within twenty (20) days of the date of service of FirstEnergy Pennsylvania Electric Company's **UNOPPOSED MOTION TO ADMIT INTERROGATORY VERIFICATION AND DISREGARD REJOINDER TESTIMONY**, which is attached to this Notice, unless an earlier date is established.

Respectfully submitted,



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*Counsel for FirstEnergy Pennsylvania
Electric Company*

Dated: July 30, 2026

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

PETITION OF FIRSTENERGY	:	
PENNSYLVANIA ELECTRIC	:	
COMPANY FOR APPROVAL OF	:	DOCKET NO. P-2026-3060298
ITS DEFAULT SERVICE	:	
PROGRAM FOR THE PERIOD	:	
FROM JUNE 1, 2027 THROUGH	:	
MAY 31, 2031	:	

**UNOPPOSED MOTION TO ADMIT INTERROGATORY VERIFICATION AND
DISREGARD REJOINDER TESTIMONY**

Pursuant to 52 Pa. Code § 5.103, FirstEnergy Pennsylvania Electric Company (“FE PA” or “the Company”) moves to admit the Verification (the “Verification”) of FE PA Analyst Carlixta De La Rosa as FirstEnergy Hearing Exhibit 2 in these proceedings. The Verification, which is included as “Attachment A” to this Motion, attests to the truth of the Company’s response to an interrogatory of the Office of Consumer Advocate (“OCA”) relating to the Company’s Customer Referral Program (“CRP”). The Retail Energy Supply Association (“RESA”) included the interrogatory as an exhibit to the surrebuttal testimony of RESA witness Frank Lacey.

Admission of the Verification is necessary for compliance with the March 23, 2026 Prehearing Order (the “Prehearing Order”) of Deputy Chief Administrative Law Judge Mark Hoyer and Administrative Law Judge Erin Gannon (the “ALJs”), which requires that all interrogatory responses admitted into evidence be accompanied by the verification of the sponsoring witness. No party to this proceeding opposes admission of the Verification or disregarding rejoinder testimony of a Company witness relating to the interrogatory.

I. BACKGROUND

In this default service program proceeding, several parties are litigating issues relating to the CRP scheduled to terminate on May 31, 2027. As part of the discovery process, the OCA submitted an interrogatory to FE PA asking for certain information about customers participating in the CRP. A copy of the interrogatory, OCA Set 1, No. 27, and FE PA's response (the "Interrogatory") is included as Attachment B to this Motion. The Company's response to the Interrogatory was sponsored by Ms. De La Rosa, who is an Analyst – Rates and Regulatory Affairs – Pennsylvania for FE PA.

On June 12, 2026, prior to hearings in these proceedings, counsel for RESA contacted counsel for FE PA to request verifications for certain FE PA discovery responses that were attached to the testimony of RESA witness Frank Lacey, including the Interrogatory. In his testimony, Mr. Lacey stated that the Interrogatory shows that CRP participants achieved savings of more than \$750,000 compared to what they would have paid under default service (i.e., the Price-to-Compare) for the time period of January 2025 through February 2026.¹

Counsel for RESA noted the provision of the Prehearing Order, which provides that "no discovery responses will be admitted into evidence unless accompanied by the verification of the sponsoring witness."² FE PA agreed to produce verifications for the discovery responses requested by RESA. However, in reviewing the Interrogatory, FE PA concluded that the information in the Interrogatory did not correspond to Mr. Lacey's testimony. Based on this conclusion, Ms. De La Rosa presented rejoinder testimony explaining that the Interrogatory instead shows the total amount paid for CRP participants for generation during the time period

¹ See RESA St. No. 1-RJ, Surrebuttal Testimony of Frank Lacey, p. 23.

² See Prehearing Order, p. 8.

shown, not the difference between the Price-to-Compare and the discounted price paid by CRP participants for generation during the same time period.³

Subsequently, the FE PA determined that the Interrogatory, including subpart (d), was correct and consistent with Mr. Lacey's surrebuttal testimony. On June 30, 2026, counsel for FE PA communicated this determination to the ALJs and requested to include the Verification in the record of this proceeding and to have the rejoinder testimony of Ms. De La Rosa disregarded. The ALJs directed counsel for FE PA to prepare an appropriate filing after ascertaining the positions of other parties.

II. THE VERIFICATION OF INTERROGATORY OCA I-27 SHOULD BE ADMITTED IN THIS PROCEEDING AND MS. DE LA ROSA'S REJOINDER TESTIMONY SHOULD BE DISREGARD

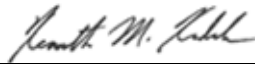
As set forth in Section I, FE PA has determined that the Interrogatory is correct and prepared the Verification to support RESA's compliance with the Prehearing Order's requirement for verifications for interrogatories admitted in this proceeding. Counsel for FE PA has contacted counsel for all parties to this proceeding to ascertain the positions of the parties and can report that OCA, the Office of Small Business Advocate, RESA, Constellation Energy Generation, LLC, and Constellation New Energy, Inc. all support admission of the Verification and the disregarding of Ms. De La Rosa's rejoinder testimony. The other parties do not object to admission of the Verification and the disregarding of Ms. De La Rosa's rejoinder testimony.

³ See FE PA St. No. 4-RJ, Rejoinder Testimony of Carlixta De La Rosa, at 2. A copy of FE PA St. No. 4-RJ is included as Attachment C to this Motion.

III. CONCLUSION

WHEREFORE, for the reasons stated above, FE PA respectfully requests admission of the Verification as FirstEnergy Pennsylvania Hearing Exhibit No. 2 and that the ALJs disregard the rejoinder testimony of FE PA witness Carlixta De La Rosa admitted as FE PA St. No. 4-RJ.

Respectfully submitted,



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Dated: July 30, 2026

*Counsel for FirstEnergy Pennsylvania
Electric Company*

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

PETITION OF FIRSTENERGY	:	
PENNSYLVANIA ELECTRIC	:	
COMPANY FOR APPROVAL OF ITS	:	DOCKET NO. P-2026-3060298
DEFAULT SERVICE PROGRAM FOR	:	
THE PERIOD FROM JUNE 1, 2027 TO	:	
MAY 31, 2031	:	

VERIFICATION

I, Joanne Savage, hereby state that the facts set forth in the Unopposed Motion to Admit Interrogatory and Verification and Disregard Rejoinder Testimony in the above-referenced proceeding are true to the best of my knowledge, information and belief, I expect to be able to prove the same at a hearing held in this matter, and that I make this verification subject to the penalties of 18 Pa. C.S. §4904 pertaining to false statements to authorities.

Date: July 30, 2026


Joanne Savage

Attachment A

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

PETITION OF FIRSTENERGY	:	
PENNSYLVANIA ELECTRIC	:	
COMPANY FOR APPROVAL OF ITS	:	DOCKET NO. P-2026-3060298
DEFAULT SERVICE PROGRAM FOR	:	
THE PERIOD FROM JUNE 1, 2027 TO	:	
MAY 31, 2031	:	

VERIFICATION

I, Carlixa De La Rosa, hereby state that the facts set forth in my responses to the discovery question in the above-referenced proceeding listed below are true to the best of my knowledge, information and belief, I expect to be able to prove the same at a hearing held in this matter, and that I make this verification subject to the penalties of 18 Pa. C.S. §4904 pertaining to false statements to authorities.

- FE Response to OCA Set 1, No. 27

Date: June 29, 2026

CARLIXTA DE LA ROSA

Carlixa De La Rosa

Attachment B

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

OCA Set 1, No. 027

Provide the following information for each FE PA distribution company for the customers enrolled in the Referral Program since January 2025:

- a. Month enrolled;
- b. Price for supply for each month following enrollment;
- c. Price for the applicable PTC for each month following enrollment;
- d. Dollar amount paid by the customer in excess of the applicable PTC or less than the applicable PTC.

RESPONSE:

- a. - d. See FE PA Response to OCA Interrogatory Set 1, No. 27 Attachment A.

FirstEnergy Pennsylvania Electric Company - Met-Ed Rate District

Provide the following information for each FE PA distribution company for the customers enrolled in the Referral Program since January 2025:

- Month enrolled;
- Price for supply for each month following enrollment;
- Price for the applicable PTC for each month following enrollment;
- Dollar amount paid by the customer in excess of the applicable PTC or less than the applicable PTC.

Residential customers

Year Month	Met-Ed - a.	Met-Ed - b.	Met-Ed - c.	Met-Ed - d.
202501	323	\$0.1024	\$0.1101	\$31,368.64
202502	316	\$0.1024	\$0.1101	\$40,837.24
202503	378	\$0.1024	\$0.1101	\$45,094.20
202504	369	\$0.1024	\$0.1101	\$46,534.22
202505	320	\$0.1024	\$0.1101	\$39,920.17
202506	278	\$0.1107	\$0.1190	\$22,746.62
202507	273	\$0.1107	\$0.1190	\$17,698.00
202508	267	\$0.1107	\$0.1190	\$17,585.25
202509	251	\$0.1107	\$0.1190	\$13,103.85
202510	301	\$0.1107	\$0.1190	\$16,065.02
202511	201	\$0.1107	\$0.1190	\$10,420.55
202512	229	\$0.1206	\$0.1297	\$6,166.48
202601	113	\$0.1206	\$0.1297	\$758.28
202602	43	\$0.1206	\$0.1297	\$27.17

Commercial customers

Year Month	Met-Ed - a.	Met-Ed - b.	Met-Ed - c.	Met-Ed - d.
202501	4	\$0.1027	\$0.1105	\$16.64
202502	7	\$0.1027	\$0.1105	\$708.09
202503	4	\$0.1027	\$0.1105	\$132.35
202504	11	\$0.1027	\$0.1105	\$564.19
202505	3	\$0.1027	\$0.1105	\$76.70
202506	2	\$0.1076	\$0.1157	\$606.36
202507	0	\$0.1076	\$0.1157	\$0.00
202508	0	\$0.1076	\$0.1157	\$0.00
202509	4	\$0.1076	\$0.1157	\$89.71
202510	5	\$0.1076	\$0.1157	\$67.32
202511	2	\$0.1076	\$0.1157	\$12.91
202512	4	\$0.1203	\$0.1293	\$42.23
202601	0	\$0.1203	\$0.1293	\$0.00
202602	0	\$0.1203	\$0.1293	\$0.00

Note:

- The number customers enrolled during the month.
- The rate offered to customers enrolling in CRP during the month.
- The rate offered to customers participating in PTC during the month.
- Cumulative savings compared to the applicable PTC for months enrolled in CRP.

FirstEnergy Pennsylvania Electric Company - Penelec Rate District

Provide the following information for each FE PA distribution company for the customers enrolled in the Referral Program since January 2025:

- Month enrolled;
- Price for supply for each month following enrollment;
- Price for the applicable PTC for each month following enrollment;
- Dollar amount paid by the customer in excess of the applicable PTC or less than the applicable PTC.

Residential customers

Year Month	Penelec - a.	Penelec - b.	Penelec - c.	Penelec - d.
202501	275	\$0.0974	\$0.1047	\$16,144.03
202502	248	\$0.0974	\$0.1047	\$16,847.28
202503	343	\$0.0974	\$0.1047	\$25,321.30
202504	349	\$0.0974	\$0.1047	\$24,404.76
202505	306	\$0.0974	\$0.1047	\$20,058.21
202506	131	\$0.1023	\$0.1100	\$9,244.52
202507	15	\$0.1023	\$0.1100	\$835.50
202508	7	\$0.1023	\$0.1100	\$179.13
202509	183	\$0.1023	\$0.1100	\$6,112.82
202510	247	\$0.1023	\$0.1100	\$8,860.85
202511	179	\$0.1023	\$0.1100	\$5,356.81
202512	168	\$0.1092	\$0.1175	\$2,795.66
202601	124	\$0.1092	\$0.1175	\$536.69
202602	40	\$0.1092	\$0.1175	\$22.57

Commercial customers

Year Month	Penelec - a.	Penelec - b.	Penelec - c.	Penelec - d.
202501	6	\$0.0966	\$0.1038	\$538.28
202502	6	\$0.0966	\$0.1038	\$593.66
202503	6	\$0.0966	\$0.1038	\$1,718.84
202504	9	\$0.0966	\$0.1038	\$1,199.94
202505	6	\$0.0966	\$0.1038	\$320.63
202506	4	\$0.1061	\$0.1141	\$115.85
202507	0	\$0.1061	\$0.1141	\$0.00
202508	0	\$0.1061	\$0.1141	\$0.00
202509	5	\$0.1061	\$0.1141	\$196.54
202510	7	\$0.1061	\$0.1141	\$180.49
202511	8	\$0.1061	\$0.1141	\$176.70
202512	4	\$0.1130	\$0.1216	\$53.65
202601	2	\$0.1130	\$0.1216	\$2.97
202602	1	\$0.1130	\$0.1216	\$0.00

Note:

- The customer number customers enrolled during the month.
- The rate offered to customers enrolling in CRP during the month.
- The rate offered to customers participating in PTC during the month.
- Cumulative savings compared to the applicable PTC for months enrolled in CRP.

FirstEnergy Pennsylvania Electric Company - Penn Power Rate District

Provide the following information for each FE PA distribution company for the customers enrolled in the Referral Program since January 2025:

- Month enrolled;
- Price for supply for each month following enrollment;
- Price for the applicable PTC for each month following enrollment;
- Dollar amount paid by the customer in excess of the applicable PTC or less than the applicable PTC.

Residential customers

Year Month	Penn Power - a.	Penn Power - b.	Penn Power - c.	Penn Power - d.
202501	77	\$0.1039	\$0.1117	\$6,287.64
202502	69	\$0.1039	\$0.1117	\$6,486.09
202503	78	\$0.1039	\$0.1117	\$8,476.24
202504	78	\$0.1039	\$0.1117	\$7,472.19
202505	85	\$0.1039	\$0.1117	\$9,877.09
202506	69	\$0.1103	\$0.1186	\$5,182.52
202507	75	\$0.1103	\$0.1186	\$3,566.50
202508	69	\$0.1103	\$0.1186	\$3,063.55
202509	70	\$0.1103	\$0.1186	\$2,683.52
202510	75	\$0.1103	\$0.1186	\$2,735.82
202511	39	\$0.1103	\$0.1186	\$1,729.00
202512	54	\$0.1172	\$0.1261	\$1,258.75
202601	21	\$0.1172	\$0.1261	\$113.94
202602	6	\$0.1172	\$0.1261	\$8.30

Commercial customers

Year Month	Penn Power - a.	Penn Power - b.	Penn Power - c.	Penn Power - d.
202501	0	\$0.1125	\$0.1210	\$136.25
202502	1	\$0.1125	\$0.1210	\$6.02
202503	4	\$0.1125	\$0.1210	\$0.00
202504	4	\$0.1125	\$0.1210	\$323.40
202505	4	\$0.1125	\$0.1210	\$88.38
202506	5	\$0.1184	\$0.1273	\$0.09
202507	5	\$0.1184	\$0.1273	\$0.00
202508	5	\$0.1184	\$0.1273	\$0.00
202509	5	\$0.1184	\$0.1273	\$2.26
202510	5	\$0.1184	\$0.1273	\$29.34
202511	6	\$0.1184	\$0.1273	\$0.00
202512	7	\$0.1277	\$0.1373	\$59.89
202601	9	\$0.1277	\$0.1373	\$0.00
202602	5	\$0.1277	\$0.1373	\$0.00

Note:

- The customer number customers enrolled during the month.
- The rate offered to customers enrolling in CRP during the month.
- The rate offered to customers participating in PTC during the month.
- Cumulative savings compared to the applicable PTC for months enrolled in CRP.

FirstEnergy Pennsylvania Electric Company - West Penn Rate District

Provide the following information for each FE PA distribution company for the customers enrolled in the Referral Program since January 2025:

- Month enrolled;
- Price for supply for each month following enrollment;
- Price for the applicable PTC for each month following enrollment;
- Dollar amount paid by the customer in excess of the applicable PTC or less than the applicable PTC.

Residential customers

Year Month	West Penn - a.	West Penn - b.	West Penn - c.	West Penn - d.
202501	295	\$0.0882	\$0.0948	\$26,723.56
202502	280	\$0.0882	\$0.0948	\$28,895.74
202503	344	\$0.0882	\$0.0948	\$39,418.74
202504	378	\$0.0882	\$0.0948	\$37,433.69
202505	331	\$0.0882	\$0.0948	\$36,474.77
202506	300	\$0.0959	\$0.1032	\$21,114.43
202507	320	\$0.0959	\$0.1032	\$15,205.77
202508	395	\$0.0959	\$0.1032	\$18,824.48
202509	310	\$0.0959	\$0.1032	\$13,209.50
202510	311	\$0.0959	\$0.1032	\$12,412.83
202511	194	\$0.0959	\$0.1032	\$6,630.78
202512	194	\$0.1018	\$0.1095	\$3,680.82
202601	123	\$0.1018	\$0.1095	\$774.08
202602	34	\$0.1018	\$0.1095	\$27.09

Commercial customers

Year Month	West Penn - a.	West Penn - b.	West Penn - c.	West Penn - d.
202501	11	\$0.0931	\$0.1001	\$478.32
202502	7	\$0.0931	\$0.1001	\$512.41
202503	7	\$0.0931	\$0.1001	\$1,134.68
202504	5	\$0.0931	\$0.1001	\$66.89
202505	4	\$0.0931	\$0.1001	\$5,086.66
202506	2	\$0.0980	\$0.1054	\$96.97
202507	0	\$0.0980	\$0.1054	\$0.00
202508	0	\$0.0980	\$0.1054	\$0.00
202509	2	\$0.0980	\$0.1054	\$28.17
202510	2	\$0.0980	\$0.1054	\$820.43
202511	6	\$0.0980	\$0.1054	\$74.96
202512	3	\$0.1022	\$0.1099	\$9.49
202601	2	\$0.1022	\$0.1099	\$116.15
202602	2	\$0.1022	\$0.1099	\$0.00

Note:

- The customer number customers enrolled during the month.
- The rate offered to customers enrolling in CRP during the month.
- The rate offered to customers participating in PTC during the month.
- Cumulative savings compared to the applicable PTC for months enrolled in CRP.

Attachment C

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION
FIRSTENERGY PENNSYLVANIA ELECTRIC COMPANY
DOCKET NO. P-2026-3060298
DEFAULT SERVICE PROGRAM

For the Period
June 1, 2027 to May 31, 2031

Rejoinder Testimony of
Carlixta De La Rosa

List of Topics Addressed
Customer Referral Program

**REJOINDER TESTIMONY
OF
CARLIXTA DE LA ROSA**

Q. Please state your name and business address.

A. My name is Carlixta De la Rosa, and my business address is 2800 Pottsville Pike, Reading, Pennsylvania 19605.

Q. Have you previously submitted testimony in this proceeding?

A. Yes. I submitted written direct and rebuttal testimony and exhibits on behalf of FirstEnergy Pennsylvania Electric Company (“FE PA” or “Company”),¹ which have been designated as FE PA Statement Nos. 4 and 4-R and FE PA Exhibits CDL-1 to CDL-5. My background and qualifications are set forth in my direct testimony.

Q. Please describe the purpose of your testimony.

A. I will address the surrebuttal testimony offered by witness Frank Lacey on behalf of the Retail Energy Supply Association (“RESA”) regarding the Company’s Customer Referral Program (“CRP”).

Q. Have you prepared any exhibits to accompany your rejoinder testimony?

A. No.

Q. Ms. De la Rosa, have you reviewed the surrebuttal testimony of Frank Lacey on behalf of RESA?

A. Yes, I have.

¹ FE PA was formed through the combination of several predecessor Pennsylvania electric utilities after approval by the Commission. On January 1, 2024, Metropolitan Edison Company, Pennsylvania Electric Company, Pennsylvania Power Company, and West Penn Power Company (collectively, the “Predecessor Companies”) merged into FE PA. Consistent with the approvals received from the Pennsylvania Public Utility Commission (“Commission”), FE PA was certificated as a public utility and authorized to provide public utility service in the territories of the Predecessor Companies.² See RESA St. No. 1-SR at p. 23.

1 **Q. Please refer to page 23 lines 17-18, of Mr. Lacey's surrebuttal testimony where he**
2 **states that the Company's response to OCA Set I, No. 27 shows that CRP participants**
3 **achieved savings of more than \$750,000 compared to what they would have paid**
4 **under default service for the time period of January 2025 through February 2026.²**
5 **Do you agree with Mr. Lacey's characterization of the data provided in column d of**
6 **the Company's response?**

7 A. I do not.

8 **Q. Can you please explain what the data provided in the Company's response to OCA**
9 **Set I, No. 27 Attachment A, part d represents?**

10 A. Yes. In reviewing Mr. Lacey's testimony, the Company determined that the amount shown
11 in OCA Set I, No. 27, Attachment A, part d represents the total amount paid for CRP
12 participants for generation during the time period shown, not the difference between the
13 PTC and the discounted price paid by CRP participants for generation during the same time
14 period.

15 **Q. Does this complete your rejoinder testimony?**

16 A. Yes, it does.

² See RESA St. No. 1-SR at p. 23.

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

PETITION OF FIRSTENERGY	:	
PENNSYLVANIA ELECTRIC COMPANY	:	DOCKET NOS. P-2026-3060298
FOR APPROVAL OF ITS DEFAULT	:	
SERVICE PROGRAM FOR THE PERIOD	:	
JUNE 1, 2027 THROUGH MAY 31, 2031	:	
	:	

VERIFICATION

I, Carlixta De La Rosa, hereby state that the facts set forth in the pre-marked statements and exhibits listed below are true and correct to the best of my knowledge, information, and belief. I understand that the statements herein are made subject to the penalties of 18 Pa.C.S. § 4904 (relating to unsworn falsification to authorities).

- FE PA Statement No.4-RJ

June 15, 2026
Date


Carlixta De La Rosa