

Morgan, Lewis & Bockius LLP
1701 Market Street
Philadelphia, PA 19103-2921
Tel: 215.963.5000
Fax: 215.963.5001
www.morganlewis.com

Morgan Lewis
C O U N S E L O R S A T L A W

Kenneth M. Kulak
Partner
215.963.5384
kkulak@MorganLewis.com

August 12, 2010

VIA FIRST CLASS MAIL

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street
P.O. Box 3265
Harrisburg, PA 17105-3265

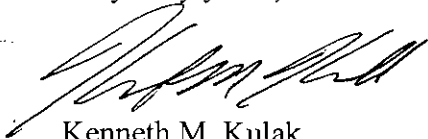
RECEIVED
2010 AUG 16 AM 10:39
PA.P.U.C.
SECRETARY'S BUREAU

Re: Joint Application of West Penn Power Company doing business as Allegheny Power, Trans-Allegheny Interstate Line Company and FirstEnergy Corp. for a Certificate of Public Convenience Under Section 1102(A)(3) of the Public Utility Code Approving a Change of Control of West Penn Power Company and Trans-Allegheny Interstate Line Company, Docket Nos. A-2010-2176520, A-2010-2176732

Dear Secretary Chiavetta:

Enclosed for filing is a Certificate of Service (original and three copies) evidencing service upon the parties of record of the Responses of West Penn Power Company, Trans-Allegheny Interstate Line Company, and FirstEnergy Corp. to the Interrogatories of the Department of Environmental Protection (Set I – Questions 14-21) and Citizens for Pennsylvania's Future (Set I – Questions 17-45 and 52-62). Highly confidential responses have been distributed in accordance with the Protective Order in this case.

Very truly yours,



Kenneth M. Kulak

KMK/ap

Enclosures

c: Per Certificate of Service (w/encls.)

Philadelphia Washington New York Los Angeles San Francisco Miami Pittsburgh Princeton Chicago Minneapolis
Palo Alto Dallas Houston Harrisburg Irvine Boston London Paris Brussels Frankfurt Beijing Tokyo

DB1/65418800.2

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**JOINT APPLICATION OF WEST PENN
POWER COMPANY doing business as
ALLEGHENY POWER, TRANS-
ALLEGHENY INTERSTATE LINE
COMPANY AND FIRSTENERGY CORP.
FOR A CERTIFICATE OF PUBLIC
CONVENIENCE UNDER SECTION
1102(A)(3) OF THE PUBLIC UTILITY CODE
APPROVING A CHANGE OF CONTROL OF
WEST PENN POWER COMPANY AND
TRANS-ALLEGHENY INTERSTATE LINE
COMPANY** :

**DOCKET NOS. A-2010-2176520
A-2010-2176732**

CERTIFICATE OF SERVICE

I hereby certify and affirm that I have this day served a copy of the Response of West Penn Power Company, Trans-Allegheny Interstate Line Company, and FirstEnergy Corp. to:

- **Interrogatories, Set I, Questions 17-45 and 52-62 of the Department of Environmental Protection; and**
- **Interrogatories, Set I, Questions 14-21 of Citizens for Pennsylvania's Future**

on the following persons in accordance with the requirements of 52 Pa. Code § 1.54:

**VIA FEDERAL EXPRESS (Confidential Materials)
and ELECTRONIC DATA ROOM (Non-Confidential Materials)**

Tanya J. McCloskey
Senior Assistant Consumer Advocate
*Darryl Lawrence
Assistant Consumer Advocate
Pennsylvania Office of Consumer Advocate
5th Floor, Forum Place
555 Walnut Street
Harrisburg, PA 17101-1923
tmccloskey@paoca.org
dlawrence@paoca.org
jhorner@paoca.org

*Allison C. Kaster
*Carrie B. Wright
Office of Trial Staff
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17120
akaster@state.pa.us
carwright@state.pa.us

2010 AUG 16 AM 10:39
PA.P.U.C.
SECRETARY'S BUREAU

*Daniel G. Asmus, Esquire
Assistant Small Business Advocate
Office of Small Business Advocate
Commerce Building, Suite 1102
300 North Second Street
Harrisburg, PA 17101
dasmus@state.pa.us

*Theodore S. Robinson
Staff Attorney
Citizen Power
2121 Murray Avenue
Pittsburgh, PA 15217
robinson@citizenpower.com
Counsel for Citizen Power, Inc.

*John K. Baillie
*Charles McPhedran
Citizens for Pennsylvania's Future
425 Sixth Avenue, Suite 2770
Pittsburgh, PA 15219
baillie@pennfuture.org
mcphehdran@pennfuture.org
Counsel for PennFuture

*Daniel Clearfield
*Deanne M. O'Dell
*Carl R. Schultz
Eckert Seamans Cherin & Mellott, LLC
P.O. Box 1248
213 Market Street, 8th Floor
Harrisburg, PA 17101
dclearfield@eckertseamans.com
dodell@eckertseamans.com
cschultz@eckertseamans.com
Counsel for Direct Energy Services, Inc., & RESA

*Richard Hahn
LaCapra Associates
One Washington Mall, 9th Floor
Boston, MA 02108
rhahn@lacapra.com

*Regina L. Matz
Thomas, Long, Niesen & Kennard
P.O. Box 9500
212 Locust Street, Suite 500
Harrisburg, PA 17108-9500
rmatz@thomaslonglaw.com
Counsel for ARIPPA

*Kurt E. Klappkowski
Commonwealth of Pennsylvania
Department of Environmental Protection
RCSOB, 9th Floor
400 Market Street
Harrisburg, PA 17101-2301
kklappkowsk@state.pa.us
Counsel for the Pennsylvania Department of Environmental Protection

*Scott H. Strauss
*Katharine M. Mapes
Spiegel & McDiarmid, LLP
1333 New Hampshire Avenue, NW
Hampshire Avenue, NW
Washington, DC 20036
scott.strauss@spiegelmc.com
katharine.mapes@spiegelmc.com
Counsel for Utility Workers Union of America, AFL-CIO and UWUA System Local No. 102

*Thomas J. Sniscak
*Todd S. Stewart
*William E. Lehman
Hawke McKeon & Sniscak LLP
P.O. Box 1778
100 North Tenth Street
Harrisburg, PA 17105
tjsniscak@hmslegal.com
tsstewart@hmslegal.com
welehman@hmslegal.com
Counsel for the Pennsylvania State University

*Gary A. Jack
*Kelly L. Geer
Duquesne Light Company
411 Seventh Avenue, 16-4
Pittsburgh, PA 15218
gjack@duqlight.com
kgeer@duqlight.com
Counsel for Duquesne Light

*Charles E. Thomas, Jr.
Thomas, Long, Niesen & Kennard
P.O. Box 9500
212 Locust Street, Suite 500
Harrisburg, PA 17108-9500
cthomasjr@thomaslonglaw.com
Counsel for Pennsylvania Rural Electric Association

*Benjamin L. Willey
Law Offices of Benjamin L. Willey, LLC
7272 Wisconsin Avenue, Suite 300
Bethesda, MD 20814
blw@bwilleylaw.com
Counsel for York County Solid Waste Authority

*James L. Crist
The Lumen Group, Inc.
4226 Yarmouth Drive, Suite 101
Allison Park, PA 15101
jlcris@aol.com

*Derrick Price Williamson
Spilman, Thomas & Battle, PLLC
1100 Bent Creek Boulevard, Suite 101
Mechanicsburg, PA 17050
dwilliamson@spilmanlaw.com
Counsel for Pennsylvania Mountains Healthcare Alliance

*Michael W. Gang
*Anthony D. Kanagy
Post & Schell, P.C.
17 North Second Street, 12th floor
Harrisburg, PA 17101-1601
mgang@postschell.com
akanagy@postschell.com
Counsel for Duquesne Light Company

*Thomas T. Niesen
Thomas, Long, Niesen & Kennard
P.O. Box 9500, Suite 500
212 Locust Street
Harrisburg, PA 17108
tniesen@thomaslonglaw.com
Counsel for West Penn Power Sustainable Energy Fund

*Sally Patton
Law Offices of Benjamin L. Willey, LLC
7272 Wisconsin Avenue, Suite 300
Bethesda, MD 20814
ssp@bwilleylaw.com

*Barbara R. Alexander
83 Wedgewood Drive
Winthrop, ME 04364
barbalex@ctel.net

VIA ELECTRONIC DATA ROOM (Non-Confidential Materials)

Stephen H. Jordan
Rothman Gordon P.C.
Third Floor, Grant Building
310 Grant Street
Pittsburgh, PA 15219
shjordan@rothmangordon.com
*Counsel for Utility Workers Union of
America, AFL-CIO and UWUA System
Local No. 102*

Charis Mincavage
Vasiliki Karandrikas
Carl J. Zwick
McNees Wallace & Nurick LLC
P.O. Box 1166
100 Pine Street
Harrisburg, PA 17108-1166
cmincavage@mwn.com
vkandrikas@mwn.com
czwick@mwn.com
*Counsel for MEIUG/PICA & West Penn Power
Industrial Intervenors*

David J. Dulick
General Counsel
Pennsylvania Rural Electric Association
212 Locust Street
P.O. Box 1266
Harrisburg, PA 17108-1266
david_dulick@prea.com
*Counsel for Pennsylvania Rural Electric
Association*

Robert M. Strickler
Griffith, Strickler, Lerman, Solymos
& Calkins
110 South Northern Way
York, PA 17402-3737
rstrickler@gslsc.com
Counsel for YCSWA

Scott J. Rubin
333 Oak Lane
Bloomsburg, PA 17815-2036
scott.j.rubin@gmail.com
Counsel for IBEW

Susan E. Bruce
Vasiliki Karandrikas
Carl J. Zwick
McNees Wallace & Nurick LLC
P.O. Box 1166
100 Pine Street
Harrisburg, PA 17108-1166
sbruce@mwn.com; vkandrikas@mwn.com
czwick@mwn.com
*Counsel for West Penn Power
Industrial Intervenors*

Eric Paul Cheung
Joseph Otis Minott
Clean Air Council
135 South 19th Street, Suite 300
Philadelphia, PA 19103
echeung@cleanair.org
joe_minott@cleanair.org
Counsel for Clean Air Council

David I. Fein
Constellation Energy
Suite 300
550 West Washington Boulevard
Chicago, IL 60661
david.fein@constellation.com

David Vollero
Executive Director YCSWA
2700 Blackbridge Road
York, PA 17406
d.vollero@ycswa.com

Divesh Gupta
Senior Counsel
Constellation Energy
111 Market Place, Suite 500
Baltimore, MD 21202
divesh.gupta@constellation.com

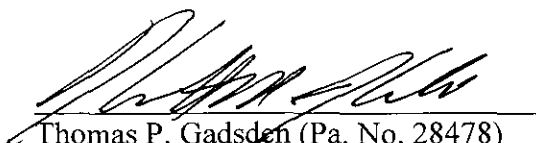
Jeff A. McNelly
ARIPPA Executive Director
2015 Chestnut Street
Camp Hill, PA 17011
jamcnelly1@arippa.org

Randall B. Palmer (Pa. No. 94161)
Jennifer L. Petrisek (Pa. No. 83411)
Allegheny Energy, Inc.
800 Cabin Hill Drive
Greensburg, PA 15601
Phone: (724) 838-6894
Fax: (724) 853-4264
Email: rpalmer@alleghenyenergy.com

W. Edwin Ogden (Pa. No. 17644)
Alan Michael Seltzer (Pa. No. 27890)
Ryan, Russell, Ogden & Seltzer PC
Suite 210
1150 Berkshire Boulevard
Wyomissing, PA 19610-1208
Phone: (610) 372-4761
Fax: (610) 372-4177
Email: aseltzer@ryanrussell.com

*Counsel for West Penn Power
Company and Trans-Allegheny
Interstate Line Company*

Dated: August 12, 2010



Thomas P. Gadsden (Pa. No. 28478)
Kenneth M. Kulak (Pa. No. 75509)
Morgan, Lewis & Bockius LLP
1701 Market Street
Philadelphia, PA 19103-2921
Phone: (215) 963-5234
Fax: (215) 963-5001
Email: tgadsden@morganlewis.com

Wendy E. Stark (Pa. No. 204753)
FirstEnergy Corporation
76 South Main Street
Akron, OH 44308
Phone: (330) 761-4307
Fax: (330) 384-3875
Email: starkw@firstenergycorp.com

Bradley A. Bingaman (Pa. No. 90443)
FirstEnergy Service Company
2800 Pottsville Pike
P.O. Box 16001
Reading, PA 19612-6001
Phone: (610) 921-6203
Fax: (610) 939-8655
Email: bbingaman@firstenergycorp.com

Counsel for FirstEnergy Corp.



UNITED STATES POSTAGE
FIRST CLASS
\$ 01.39⁰
02 1A
0004326987 AUG 12 2010
MAILED FROM ZIP CODE 19103

KMK #T3847 #042057-01-0006

1701 Market Street
Philadelphia, PA 19103-2921

Morgan Lewis
C O U N S E L O R S A T L A W

TO:

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street
P.O. Box 3265
Harrisburg, PA 17105-3265