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August 17, 2010

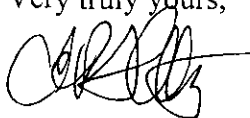
Rosemary Chiavetta, Secretary
PA Public Utility Commission
PO Box 3265
Harrisburg, PA 17105-3265

Re: Joint Application of West Penn Power Company d/b/a 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 and A-2010-2176732

Dear Secretary Chiavetta:

On July 15th, Direct Energy Services, Inc., filed its Motion to Dismiss Objections and Compel Response to its Set II Interrogatories to West Penn Power Company d/b/a/ Allegheny Power, Trans-Allegheny Interstate Line Company and FirstEnergy Corp. We inadvertently did not attach Exhibit A. Accordingly, please find Exhibit A attached. Our apologies for any inconvenience this may have caused. Copies have been served in accordance with the attached Certificate of Service.

Very truly yours,



Carl R. Shultz, Esq.

CRS/lww
Enclosure

cc: Hon. Wayne Weismandel, w/enc.
Hon. Mary Long, w/enc.
Cert. of Service w/enc.

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Exhibit A

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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 : DOCKET NOS. A-2010-2176520
CONVENIENCE UNDER SECTION : A-2010-2176732
1102(A)(3) OF THE PUBLIC UTILITY CODE :
APPROVING A CHANGE OF CONTROL OF :
WEST PENN POWER COMPANY AND :
TRANS-ALLEGHENY INTERSTATE LINE :
COMPANY :

OBJECTIONS OF WEST PENN POWER COMPANY, TRANS-ALLEGHENY
INTERSTATE LINE COMPANY, AND FIRSTENERGY CORP.
TO THE INTERROGATORIES (SET II)
OF DIRECT ENERGY SERVICES

Pursuant to 66 Pa. C.S. §333(d) and 52 Pa. Code §5.342, West Penn Power Company (West Penn), Trans-Allegheny Interstate Line Company (TrAILCo), and FirstEnergy Corp. (FirstEnergy; collectively, the Companies) hereby object to Set II Interrogatory Nos. 1(b) and 1(c) propounded by Direct Energy Services (“Direct Energy”). A copy of the Interrogatories is attached as Appendix A and incorporated herein by reference.

OBJECTIONS TO DIRECT ENERGY SET II INTERROGATORIES 1(B) AND 1(C)

1. The Companies object to Interrogatories 1(b) and 1(c) because these interrogatories seek information that is not relevant to the approvals sought in this proceeding. As with Direct Energy Set I Interrogatories 5(b), 5(c), and 5(d), Set II Interrogatories 1(b) and 1(c) seek information on the percentage of retail market share of the retail marketing affiliates of the Companies, specifically the amount of retail load served by FirstEnergy and Allegheny Energy retail companies as a percentage of total load served by FirstEnergy’s regulated utilities

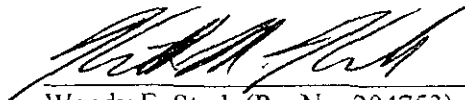
(Metropolitan Edison Company, Pennsylvania Electric Company, and Pennsylvania Power Company) and West Penn Power Company.

2. The Administrative Law Judges in this proceeding have already denied Direct Energy's motion to compel the Companies to provide similar information on an individual company basis. Direct Energy's request for information on an aggregate basis for FirstEnergy and Allegheny Energy does not alter the highly sensitive commercial and competitive nature of this information.

WHEREFORE, the Objections of West Penn Power Company, Trans-Allegheny Interstate Line Company, and FirstEnergy Corp. to the Set II Interrogatories 1(b) and 1(c) propounded by Direct Energy Services should be granted.

Respectfully submitted,

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Date: August 2, 2010

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APPENDIX A

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18. Term “DS” or “default services” means default service or provider of last resort service, as those terms are defined in PUC regulations.

INTERROGATORIES

1. Re: data provided in response to DE-I-24(a) (attached to FE copy): The Confidential Response to “FERC Interrogatory #8, June 10, 2010” provides data on the portion of the retail market within PJM served by affiliates of First Energy and Allegheny.
- (a) Confirm that the column titled “Total FirstEnergy & Allegheny Retail Load” includes FE and Allegheny retail customers served on default service.
 - (b) If the answer to a) is confirmed, provide the comparable figure for the Pennsylvania FE and Allegheny service territories in total, as well as the comparable Pennsylvania percentage of total FE and Allegheny Retail to total retail load in FE/Allegheny service territories (comparable to the last column on the Response to FERC Interrogatory #8).
 - (c) If available, provide the same total numbers by: residential, small commercial (up to 300 kw) and large commercial and industrial customers.
 - (d) If the response to FERC Interrogatory #8 did not include DS load, please provide the total load that is being served by FE/AP (including DS load) in the combined service territories at the present time.

Note: These questions do not request individual market shares for FES or Allegheny Energy Supply. Please provide only aggregated numbers.

Respectfully submitted,

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Dated: July 28, 2010

CERTIFICATE OF SERVICE

I hereby certify that this day I served a copy Direct Energy's Exhibit A to Motion to Dismiss and Compel Response to Set II upon the persons listed below in the manner indicated in accordance with the requirements of 52 Pa. Code Section 1.54.

Via Email only

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Dated: August 17, 2010



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