

Thomas J. Sniscak (717) 236-1300 x224 tjsniscak@hmslegal.com

Whitney E. Snyder (717) 236-1300 x260 wesnyder@hmslegal.com

Bryce R. Beard (717) 236-1300 x248 brbeard@hmslegal.com

100 North Tenth Street, Harrisburg, PA 17101 Phone: 717.236.1300 Fax: 717.236.4841 www.hmslegal.com

January 10, 2022

Via Electronic Filing

Rosemary Chiavetta, Secretary Pennsylvania Public Utility Commission Commonwealth Keystone Building 400 North Street, 2nd Floor (filing room) Harrisburg, PA 17120

Re: Petition of Metropolitan Edison Company for Approval to Establish and Implement a Distribution System Improvement Charge; Docket Nos. P-2015-2508942 & C-2016-2531040

Petition of Pennsylvania Electric Company for Approval to Establish and Implement a Distribution System Improvement Charge; Docket Nos. P-2015-2508936 & C-2016-2531060

Petition of Pennsylvania Power Company for Approval to Establish and Implement a Distribution System Improvement Charge; Docket Nos. P-2015-2508931 & C-2016-2531054

Petition of West Penn Power Company for Approval to Establish and Implement a Distribution System Improvement Charge; Docket Nos. P-2015-2508948 & C-2016-2531019

THE PENNSYLVANIA STATE UNIVERSITY'S LETTER IN LIEU OF PREHEARING CONFERENCE MEMORANDUM AND UPDATED SERVICE LIST

Dear Secretary Chiavetta:

Pursuant to the notice from the Secretary's Bureau, the Pennsylvania State University hereby resubmits its Letter in Lieu of Prehearing Conference Memorandum and Updated Service List previously filed and served on January 7, 2022 to correct an error in the above referenced docket number for the Penn Power Complaint.

On January 6, 2022, FirstEnergy and the Office of Consumer Advocate filed prehearing conference memoranda requesting that this proceeding be held in abeyance and for a Material Question to be certified to the Commission regarding the initiation of a generic proceeding for

Rosemary Chiavetta, Secretary Pennsylvania Public Utility Commission January 10, 2022 Page 2

the purpose of revising the Model Tariff adopted at M-2012-2293611. The Pennsylvania State University hereby states it does not object to this procedure.

Service on the Pennsylvania State University. Simultaneous with this letter, the Pennsylvania State University filed a withdraw and notice of appearance of additional counsel. The Pennsylvania State University hereby requests that the service list be modified as follows:

Thomas J. Sniscak, Attorney I.D. No. 33891
Whitney E. Snyder, Attorney I.D. No. 316625
Bryce R. Beard, Attorney I.D. No. 325837
Hawke McKeon & Sniscak LLP
100 N 10th Street
Harrisburg, PA 17101
(717) 236-1300
(717) 236-4841 (fax)
tjsniscak@hmslegal.com
wesnyder@hmslegal.com
brbeard@hmslegal.com

Due to the request to hold this matter in abeyance and certify a material question to the Commission, the Pennsylvania State University hereby reserves the right to identify any witnesses, issues, or other matter should this matter not be held in abeyance for a generic proceeding on the issues.

Very truly yours,

/s/ Thomas J. Sniscak

Thomas J. Sniscak, Attorney I.D. No. 33891 Whitney E. Snyder, Attorney I.D. No. 316625 Bryce R. Beard, Attorney I.D. No. 325837

Counsel for The Pennsylvania State University

BRB/das

cc: Honorable Joel H. Cheskis (via email <u>jcheskis@pa.gov</u>)

Per Certificate of Service

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the foregoing document upon the parties, listed below, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a party).

VIA ELECTRONIC MAIL ONLY

ANTHONY C DECUSATIS ESQUIRE MORGAN LEWIS & BOCKIUS LLP 1701 MARKET STREET PHILADELPHIA PA 19103-2921 adecusatis@morganlewis.com CHARLES V FULLEM, DIRECTOR JOANNE SAVAGE, DIRECTOR OF RATES FIRSTENERGY CORPORATION 2800 POTTSVILLE PIKE READING PA 19605 cvfullem@firstenergycorp.com jmsavage@firstenergycorp.com

TORI L GIESLER ESQUIRE FIRSTENERGY SERVICE COMPANY 2800 POTTSVILLE PIKE READING PA 19605 paregulatorycomplaints@firstenergycorp.com DARRYL A LAWRENCE ESQUIRE ERIN L GANNON ESQUIRE HARRISON W BREITMAN ESQUIRE OFFICE OF CONSUMER ADVOCATE 5TH FLOOR FORUM PLACE 555 WALNUT STREET HARRISBURG PA 17101-1923 dlawrence@paoca.org egannon@paoca.org

KENNETH M KULAK ESQUIRE BROOKE E MCGLINN ESQUIRE MORGAN LEWIS & BOCKIUS LLP 1701 MARKET STREET PHILADELPHIA PA 19103-2921 kkulak@morganlewis.com bmcglinn@morganlewis.com ERIN FURE
OFFICE OF SMALL BUSINESS
ADVOCATE
FORUM PLACE
555 WALNUT STREET 1ST FLOOR
HARRISBURG PA 17101
efure@pa.gov

hbreitman@paoca.org

DARSHANA SINGH ESQUIRE FIRSTENERGY SERVICE COMPANY 2800 POTTSVILLE PIKE READING PA 19612-6001 singhd@firstenergycorp.com

DAVID F BOEHM ESQUIRE BOEHM KURTZ & LOWRY 36 E SEVENTH STREET SUITE 1510 CINCINNATI OH 45202 dboehm@bkllawfirm.com Certificate of Service Page 2

CHARIS MINCAVAGE ESQUIRE
ALESSANDRA L HYLANDER ESQUIRE
SUSAN E BRUCE ESQUIRE
MCNEES WALLACE & NURICK LLC
100 PINE STREET
PO BOX 1166
HARRISBURG PA 17108
cmincavage@mwn.com
alessandra.hylander@gmail.com
sbruce@mcneeslaw.com

/s/ Thomas J. Sniscak

Thomas J. Sniscak Whitney E. Snyder Bryce R. Beard

Dated this 10th day of January, 2022