

# Morgan Lewis

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December 12, 2023

## VIA eFILING

Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street, 2nd Floor  
Harrisburg, PA 17105-3265

**Re: Petition of Metropolitan Edison Company for Approval of a Distribution System Improvement Charge – Docket No. P-2015-2508942  
Office of Consumer Advocate v. Metropolitan Edison Company  
Docket No. C-2016-2531040**

**Re: Petition of Pennsylvania Electric Company for Approval of a Distribution System Improvement Charge – Docket No. P-2015-2508936  
Office of Consumer Advocate v. Pennsylvania Electric Company  
Docket No. C-2016-2531060**

**Re: Petition of Pennsylvania Power Company for Approval of a Distribution System Improvement Charge – Docket No. P-2015-2508931  
Office of Consumer Advocate v. Pennsylvania Power Company  
Docket No. C-2016-2531054**

**Re: Petition of West Penn Power Company for Approval of a Distribution System Improvement Charge – Docket No. P-2015-2508948  
Office of Consumer Advocate v. West Penn Power Company  
Docket No. C-2016-2531019**

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Dear Secretary Chiavetta:

On behalf of **Metropolitan Edison Company, Pennsylvania Electric Company, Pennsylvania Power Company, and West Penn Power Company** and the **Office of Consumer Advocate**,

**Morgan, Lewis & Bockius LLP**

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**Rosemary Chiavetta, Secretary**  
**Pennsylvania Public Utility Commission**  
**December 12, 2023**  
**Page 2**

enclosed is the **Joint Status Report** for filing in the above-captioned matters. Copies of the Joint Status Report have been served upon Administration Law Judge Mark A. Hoyer and all parties of record, as indicated on the attached Certificate of Service.

Very truly yours,

A handwritten signature in black ink, appearing to read "Kenneth M. Kulak". The signature is written in a cursive style with a large initial 'K'.

Kenneth M. Kulak

KMK/ap  
Enclosures

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

DB1/ 142903869.1

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Petition of Metropolitan Edison Co. for Approval : Docket Nos. P-2015-2508942,  
of a Distribution System Improvement Charge : C-2016-2531040

Petition of Pennsylvania Electric Co. for Approval : Docket Nos. P-2015-2508936,  
of a Distribution System Improvement Charge : C-2016-2531060

Petition of Pennsylvania Power Co. for Approval : Docket Nos. P-2015-2508931,  
of a Distribution System Improvement Charge : C-2016-2531054

Petition of West Penn Power Co. for Approval : Docket Nos. P-2015-2508948,  
of a Distribution System Improvement Charge : C-2016-2531019

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JOINT STATUS REPORT

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This Joint Status Report is being submitted on behalf of the Office of Consumer Advocate (OCA) and Metropolitan Edison Company, Pennsylvania Electric Company, Pennsylvania Power Company, and West Penn Power Company (FirstEnergy) as directed by Administrative Law Judge Mark A. Hoyer (ALJ) in the First Interim Order Setting Time Frame for Discovery and Requiring the Filing of a Status Report issued August 14, 2023, and in subsequent e-mail correspondence between ALJ Hoyer and the parties to this proceeding.

As discussed in that Order and at a telephonic conference held on August 8, 2023, ALJ Hoyer permitted discovery for a period of 90 days, except on issues related to refunds, and also rescinded prior modifications to the discovery rules such that responses to written interrogatories are due within 20 days pursuant to 52 Pa. Code § 5.342(d).

Following informal discussions regarding the discovery, the OCA served written interrogatories on FirstEnergy on September 7, 2023. FirstEnergy provided responses on September 27, 2023. Subsequently, the OCA served additional written interrogatories on October 10, 2023, and FirstEnergy provided responses on November 1, 2023. The discovery period closed on November 6, 2023.

The OCA and FirstEnergy have conferred further regarding the status of this proceeding in light of the Supplemental Implementation Order entered in Docket No. M-2012-2293611 on October 27, 2022, and the discovery produced by FirstEnergy, and agree that no further action is required because the Commission has disposed of the matter remanded by the Pennsylvania Supreme Court on a generic basis. As such, the OCA and FirstEnergy now jointly request that these dockets be marked closed. Counsel for FirstEnergy and the OCA have communicated with

counsel for all other parties to these proceedings and no other party has any objection to this request.



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*Counsel for Metropolitan Edison  
Company, Pennsylvania Electric  
Company, Pennsylvania Power  
Company and West Penn Power  
Company*

Dated: December 12, 2023

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Respectfully Submitted,

/s/ Erin L. Gannon

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**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**Petition of Metropolitan Edison Company : P-2015-2508942**  
**for Approval of a Distribution System :**  
**Improvement Charge :**

**Office of Consumer Advocate : C-2016-2531040**  
**v. :**  
**Metropolitan Edison Company :**

**Petition of West Penn Power Company : P-2015-2508948**  
**for Approval of a Distribution System :**  
**Improvement Charge :**

**Office of Consumer Advocate : C-2016-2531019**  
**v. :**  
**West Penn Power Company :**

**Petition of Pennsylvania Electric : P-2015-2508936**  
**Company for Approval of a Distribution :**  
**System Improvement Charge :**

**Office of Consumer Advocate : C-2016-2531060**  
**v. :**  
**Pennsylvania Electric Company :**

**Petition of Pennsylvania Power Company : P-2015-2508931**  
**for Approval of a Distribution System :**  
**Improvement Charge :**

**Office of Consumer Advocate : C-2016-2531054**  
**v. :**  
**Pennsylvania Power Company :**

**CERTIFICATE OF SERVICE**

I hereby certify and affirm that I have this day served a copy of the **Joint Status Report** on the following persons in the matter specified in accordance with the requirements of 52 Pa.

Code § 1.54:

VIA ELECTRONIC MAIL

The Honorable Mark A. Hoyer  
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Dated: December 12, 2023

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