

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE

In re:

AMERICAN SIGNATURE, INC., et al.,

Debtors.

)  
) Chapter 11  
)  
) Case No. 25-12105 (JKS)  
)  
) (Jointly Administered)  
)  
) Re: Docket Nos. 9,75 & 177  
)  
) Obj. Deadline: 12/29/25, 4:00 p.m.  
) Hearing Date: 1/5/26, 1:00 p.m.  
)

JOINDER OF CERTAIN FIRSTENERGY OPERATING COMPANIES TO  
THE OBJECTION OF CERTAIN UTILITY COMPANIES TO THE  
MOTION OF DEBTORS FOR ENTRY OF INTERIM AND FINAL ORDERS  
(I) DETERMINING ADEQUATE ASSURANCE OF PAYMENT FOR FUTURE  
UTILITY SERVICES, (II) PROHIBITING UTILITY PROVIDERS FROM ALTERING,  
REFUSING, OR DISCONTINUING SERVICES, (III) APPROVING  
DEBTORS' PROPOSED PROCEDURES FOR RESOLVING ADEQUATE ASSURANCE  
REQUESTS, AND (IV) GRANTING RELATED RELIEF

Pennsylvania Power Company ("Penn Power"), Ohio Edison Company ("Ohio Edison"), Potomac Edison Company ("PE"), Monongahela Power Company ("Mon Power"), The Cleveland Electric Illuminating Company ("CEI") and Toledo Edison Company ("TE") (collectively, the "Joinder Utilities"), by counsel, hereby join in the *Objection of Certain Utility Companies To the Motion of Debtors For Entry of Interim and Final Orders (I) Determining Adequate Assurance of Payment For Future Utility Services, (II) Prohibiting Utility Providers From Altering, Refusing, or Discontinuing Services, (III) Approving Debtors' Proposed Procedures For Resolving Adequate Assurance*



2512105251211000000000057

*Requests, and (IV) Granting Related Relief* (the "Objection") Docket No. 177), and set forth the following:

**Introduction**

1. The Joinder Utilities adopt and incorporate by reference herein the *Introduction* section set forth in the Objection.

**Facts**

2. The Joinder Utilities adopt and incorporate by reference herein the *Facts* section set forth in the Objection.

**Facts Regarding the Utilities Section**

3. The Joinder Utilities adopt and incorporate by reference herein the *Facts Regarding the Utilities* section set forth in the Objection because the billing and payment terms set forth in that section are essentially the same as to the Joinder Utilities.

4. In order to avoid the need to bring witnesses and have lengthy testimony regarding the Joinder Utilities' regulated billing cycles, the Joinder Utilities request that this Court, pursuant to Rule 201 of the Federal Rules of Evidence, take judicial notice of their billing cycles. Pursuant to the foregoing request and based on the voluminous size of the applicable documents, the Joinder Utilities are providing the web site links to the following tariffs and/or state laws, regulations and/or ordinances:

Potomac Edison:

Maryland -

[https://www.firstenergycorp.com/content/customer/customer\\_choice/maryland/maryland\\_tariffs.html](https://www.firstenergycorp.com/content/customer/customer_choice/maryland/maryland_tariffs.html)

CEI, TE and Ohio Edison:

[https://www.firstenergycorp.com/content/customer/customer\\_choice/ohio/ohio\\_tariffs.html](https://www.firstenergycorp.com/content/customer/customer_choice/ohio/ohio_tariffs.html)

Penn Power:

[https://www.firstenergycorp.com/content/customer/customer\\_choice/pennsylvania/pennsylvania\\_tariffs.html](https://www.firstenergycorp.com/content/customer/customer_choice/pennsylvania/pennsylvania_tariffs.html)

Mon Power:

[https://www.firstenergycorp.com/customer\\_choice/west\\_virginia/west\\_virginia\\_tariffs.html](https://www.firstenergycorp.com/customer_choice/west_virginia/west_virginia_tariffs.html)

5. Subject to a reservation of the Joinder Utilities' right to supplement their post-petition deposit requests if additional accounts belonging to the Debtors are subsequently identified, the Joinder Utilities' estimated prepetition debt and post-petition deposit requests are as follows:

<u>Utility</u>	<u>No. of Accts.</u>	<u>Est. Prepet. Debt</u>	<u>Dep. Request</u>
Penn Power	1	\$2,641.09	\$3,650 (2-month)
Ohio Edison	3	\$13,336.89	\$9,066 (2-month)
PE	1	\$6,625.82	\$13,578 (2-month)
Mon Power	1	\$3,686.75	\$10,544 (2-month)
CEI	5	\$42,091.74	\$16,534 (2-month)
TE	3	\$13,766	\$20,818 (2-month)

6. Penn Power held a prepetition cash deposit in the amount of \$1,318.38 that it recouped against prepetition debt pursuant to Section 366(c)(4) of the Bankruptcy Code. No prepetition deposit amount remains after recoupment.

7. Ohio Edison held a prepetition cash deposit in the amount of \$2,057 that it recouped against prepetition debt pursuant to

Section 366(c)(4) of the Bankruptcy Code. No prepetition deposit amount remains after recoupment.

**Discussion**

8. The Joinder Utilities incorporate and adopt by reference the legal and factual arguments set forth in the Objection.

WHEREFORE, the Joinder Utilities respectfully request that this Court enter an order:

1. Denying the Utility Motion as to the Joinder Utilities;
2. Awarding the Joinder Utilities the post-petition adequate assurance of payment pursuant to Section 366 in the amounts and forms satisfactory to the Joinder Utilities;
3. Require the Debtors to close accounts with the Joinder Utilities when they no longer require post-petition service from the Utility for that account or remain administratively responsible for such charges until they do close the account(s); and
4. Providing such other and further relief as the Court deems just and appropriate.

Dated: December 11, 2025

WHITEFORD, TAYLOR & PRESTON LLC

/s/ William F. Taylor, Jr.  
William F. Taylor, Jr. (#2936)  
600 North King Street, Suite 300  
Wilmington, Delaware 19801  
Telephone: (302) 353-4145  
Facsimile: (302) 357-3270  
E-mail: [wtaylor@whitefordlaw.com](mailto:wtaylor@whitefordlaw.com)

and

LAW FIRM OF RUSSELL R. JOHNSON III, PLC  
Russell R. Johnson III (VSB No. 31468)  
John M. Craig (VSB No. 32977)  
2258 Wheatlands Drive  
Manakin-Sabot, Virginia 23103  
Telephone: (804) 749-8861  
E-mail: [russell@russelljohnsonlawfirm.com](mailto:russell@russelljohnsonlawfirm.com)  
[john@russelljohnsonlawfirm.com](mailto:john@russelljohnsonlawfirm.com)

*Counsel for Pennsylvania Power  
Company, Ohio Edison Company, Potomac  
Edison Company, Monongahela Power  
Company, The Cleveland Electric  
Illuminating Company and Toledo Edison  
Company*

**CERTIFICATE OF SERVICE**

I, William F. Taylor, Jr., do hereby certify that in addition to the notice and service provided through the Court's ECF system, on December 11, 2025, I caused a true and correct copy of the *Joinder of Certain FirstEnergy Operating Companies to the Objection of Certain Utility Companies to the Motion of Debtors for Entry of Interim and Final Orders (I) Determining Adequate Assurance of Payment for Future Utility Services, (II) Prohibiting Utility Providers from Altering, Refusing, or Discontinuing Services, (III) Approving Debtors' Proposed Procedures for Resolving Adequate Assurance Requests, and (IV) Granting Related Relief* to be served by email on:

Laura Davis Jones  
David M. Bertenthal  
PACHULSKI STANG ZIEHL & JONES LLP  
919 North Market Street, 17<sup>th</sup> Floor  
P.O. Box 8705  
Wilmington, Delaware 19899-8705  
Email: [ljones@pszjlaw.com](mailto:ljones@pszjlaw.com), [dbertenthal@pszjlaw.com](mailto:dbertenthal@pszjlaw.com)  
*Debtors' Counsel*

Malcolm M Bates  
Office of the United States Trustee  
844 King Street, Suite 2207  
Wilmington, Delaware 19801  
Email: [malcolm.m.bates@usdoj.gov](mailto:malcolm.m.bates@usdoj.gov)  
Seth Van Aalten  
Justin R. Alberto  
Sarah A. Carnes  
COLE SCHOTZ P.C.  
1325 Avenue of the Americas, 19<sup>th</sup> Floor  
New York, New York 10019  
Email: [svanaalten@coleschotz.com](mailto:svanaalten@coleschotz.com), [jalberto@coleschotz.com](mailto:jalberto@coleschotz.com),  
[scarnes@coleschotz.com](mailto:scarnes@coleschotz.com)  
*Creditor Committee Counsel*

Jason R. Adams  
Richard Gage  
Eric R. Wilson  
KELLEY DRYE & WARREN LLP  
3 World Trade Center  
175 Greenwich Street  
New York, New York 10007  
[jadams@kelleydrye.com](mailto:jadams@kelleydrye.com), [rgage@kelleydrye.com](mailto:rgage@kelleydrye.com),  
[ewilson@kelleydrye.com](mailto:ewilson@kelleydrye.com)  
*Creditor Committee Counsel*

Maeghan J. McLoughlin  
KELLEY DRYE & WARREN LLP  
101 Park Avenue  
New York, New York 10178  
Email: [mmcloughlin@kelleydrye.com](mailto:mmcloughlin@kelleydrye.com)  
*Creditor Committee Counsel*

Stacy L. Newman  
Carol E. Thompson  
COLE SCHOTZ P.C.  
500 Delaware Avenue, Suite 600  
Wilmington, Delaware 19801  
Email: [snewman@coleschotz.com](mailto:snewman@coleschotz.com), [cthompson@coleschotz.com](mailto:cthompson@coleschotz.com)  
*Creditor Committee Counsel*

/s/ William F. Taylor, Jr.  
William F. Taylor, Jr. (#2936)