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VIA FEDEX NEXT DAY

May 2, 2011

Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street  
Harrisburg, PA 17120

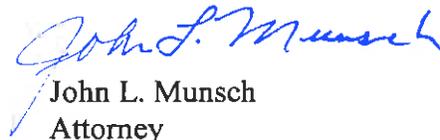
Re: **Comments of Metropolitan Edison Company, Pennsylvania Electric Company,  
Pennsylvania Power Company and West Penn Power Company to the Tentative  
Order Proposing Expedited Process for Approval of Minor Changes to EDC Act  
129 EE&C Plans  
Docket No. M-2008-2069887**

Dear Secretary Chiavetta:

Enclosed are original and fifteen (15) copies of the Reply Comments of Metropolitan Edison Company, Pennsylvania Electric Company, Pennsylvania Power Company and West Penn Power Company to the Tentative Order Proposing Expedited Process for Approval of Minor Changes to EDC Act 129 EE&C Plans.

The Reply Comments are filed electronically and by express delivery and are deemed filed today pursuant to 52 Pa. Code 51.11.

Very truly yours,

  
John L. Munsch  
Attorney

JLM:sac

Enclosures

c: Kriss E. Brown, Law Bureau – kribrown@state.pa.us

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**Re: Energy Efficiency and Conservation :**  
**Program :** **Docket No. M-2008-2069887**

**CERTIFICATE OF SERVICE**

I hereby certify that I have this day served a true and correct copy of the Reply Comments of FirstEnergy Affiliates upon the individuals listed below, in accordance with the requirements of 52 Pa. Code 1.54 (relating to service by a participant) by electronic mail and first-class mail, postage prepaid addressed as follows:

Irwin A. Popowsky, Esq.  
Office of Consumer Advocate  
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Harrisburg, PA 17101  
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Johnnie E. Simms, Esq.  
Office of Trial Staff  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Bldg.  
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Industrial Energy Consumers of Pennsylvania  
McNees Wallace & Nurick, LLC  
100 Pine St.  
Harrisburg, PA 17108-1166

Dated: May 2, 2011

  
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Attorney I.D. No. 31489

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**Re: Energy Efficiency and Conservation Program : Docket No. M-2008-2069887**

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**REPLY COMMENTS OF METROPOLITAN EDISON COMPANY, PENNSYLVANIA  
ELECTRIC COMPANY, PENNSYLVANIA POWER COMPANY AND WEST PENN  
POWER COMPANY REGARDING THE TENTATIVE ORDER PROPOSING  
EXPEDITED PROCESS FOR APPROVAL OF MINOR CHANGES TO EDC ACT 129  
EE&C PLANS**

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Metropolitan Edison Company (“Met-Ed”), Pennsylvania Electric Company (“Penelec”), Pennsylvania Power Company (“Penn Power”) and West Penn Power Company (collectively, “the Companies”) hereby submit Reply Comments to the Comments of the Industrial Energy Consumers of Pennsylvania (“IECPA”) on the Commission’s Tentative Order Proposing Expedited Process for Approval of Minor Changes to Electric Distribution Utility Act 129 Energy Efficiency & Conservation (“EE&C”) Plans (“Tentative Order”). As member electric distribution companies of the Energy Association of Pennsylvania (“EAP”) the Companies support and incorporate by reference herein the EAP’s Reply Comments that will be filed by the EAP today. The Companies, however, would like to share an example of where the expedited review process would have been appropriate to review plan changes.

On February 18, 2011, Met-Ed, Penelec and Penn Power filed two Petitions for EE&C plan amendments. One Petition requested immediate, expedited approval for three changes to the three companies’ EE&C Plans: (i) an amendment to increase incentives paid for the Residential HVAC and Heat Pump Maintenance/Tune-ups (“HVAC Tune-Ups”); (ii) an amendment to add an Energy Conservation Kit offering to Governmental & Institutional customers within the Small Commercial and Industrial (“C/I”) Equipment Program; and (iii) an

amendment to increase incentives paid to Governmental & Institutional customers for various measures within the C/I Equipment Programs. The program changes did not affect rates, budgets or other aspects of the companies' EE&C Plans. Thus, the changes would have fallen under the definition of "minor changes" as proffered by the Commission in the Tentative Order and by EAP in its Comments. Also, none of the stakeholders had any objection to the changes. Although the Commission ruled on the Petition expeditiously, had the expedited process been in effect, the companies would have been able to file the changes under the expedited process and would have saved time and resources for the Commission, the companies and the stakeholders. This is an example of where the expedited process would have been beneficial for all parties involved.

The Companies appreciate the opportunity to comment on the Commission's Tentative Order and respectfully request that the Commission reject the IECPA's Comments and adopt the EAP and the Companies' Comments.

Respectfully submitted,

Dated: May 2, 2011

  
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