

Kathy J. Kolich
Senior Attorney330-384-4580
Fax: 330-384-3875

April 21, 2011

VIA OVERNIGHT FEDERAL EXPRESSRosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor
Harrisburg, PA 17120**RECEIVED**

APR 21 2011

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

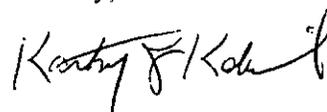
Re: *Comments of Metropolitan Edison Company, Pennsylvania Electric Company, Pennsylvania Power Company and West Penn Power Company to the Tentative Order Proposing Expedited Process for Approval of Minor Changes to EDC Act 129 EE&C Plans*
Docket No. M-2008-2069887

Dear Secretary Chiavetta:

Enclosed are an original and eleven (11) copies of the 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.

Please date stamp the additional copy of the Comments and return it to me in the enclosed, postage-prepaid envelope. Should you have any questions regarding this matter, please do not hesitate to contact me.

Sincerely,



Kathy J. Kolich

Enclosure

c: Kriss E. Brown, Law Bureau
Johnnie E. Simms, Office of Trial Staff
William R. Lloyd, Office of Small Business Advocate
Irwin A. Popowsky, Office of Consumer Advocate

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

RECEIVED
APR 21 2011
PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

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

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

Metropolitan Edison Company, Pennsylvania Electric Company, Pennsylvania Power Company and West Penn Power Company (collectively, "the Companies") appreciate the opportunity to comment on the Commission's Tentative Order Proposing Expedited Process for Approval of Minor Changes to Electric Distribution Utility ("EDU") Act 129 Energy Efficiency & Conservation ("EE&C") Plans ("Tentative Order"). The Companies commend the Commission for recognizing the need for an expedited process for minor EE&C Plan changes. In addition to the Companies' brief comments below, as member EDCs of the Energy Association of Pennsylvania ("EAP"), the Companies support and specifically incorporate by reference the EAP's comments to the Tentative Order that will also be filed by the EAP today. Because the EAP's comments are fairly inclusive, the Companies' comments will be brief, focusing on two minor suggested changes.

First, the Tentative Order requires that the EDCs file with the Commission and serve on the Office of Consumer Advocate ("OCA"), Office of Small Business Advocate ("OSBA") and Office of Trial Staff ("OTS") and all parties of record the proposed revised EE&C plan identifying the minor changes. Because the EE&C plans for each

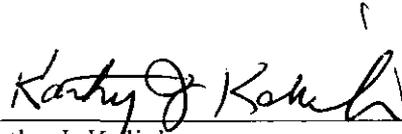
EDC are voluminous (generally more than 100 pages), it is incredibly time-consuming and costly to serve and file a complete proposed revised plan. Thus, the Companies propose that the Commission not require the EDCs to supply an entire revised plan for minor changes. Rather, the Companies suggest that the EDCs simply file documentation (which may include various pages from the approved plan) sufficient to support the change, which would also explain how the changes affect the current plan as approved. Because it is anticipated that the changes through this process will be minor, this suggested revision to the Tentative Order will eliminate unnecessary paperwork, reduce compliance costs and make the process more efficient.

Second, the Tentative Order indicates that the Commission is delegating its authority to approve “minor EE&C Plan changes, as defined below, to staff of the Bureau of Conservation, Economics and Energy Planning, with assistance from staff of the Bureau of Fixed Utility Services and the Law Bureau.” (Tentative Order at p. 4.) Because it is possible that these divisions could change names or be reorganized in the future, the Companies suggest that that the language “or their successor division(s) as determined by the Commission” be added to this provision. This suggested revision will eliminate any future confusion should these divisions or the Commission’s structure change.

In conclusion, the Companies respectfully request that the Commission adopt these two comments along with the comments proffered by the EAP and revise the Tentative Order accordingly.

Respectfully submitted,

Dated: April 21, 2011

A handwritten signature in black ink, appearing to read "Kathy J. Kolich", written over a horizontal line.

Kathy J. Kolich
Attorney No. 92203
FirstEnergy Service Company
76 South Main Street
Akron, OH 44309
(330) 384-4580
(330) 384-3875
kkolich@firstenergycorp.com

Attorney for Metropolitan Edison Company,
Pennsylvania Electric Company,
Pennsylvania Power Company and
West Penn Power Company

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 foregoing document upon the individuals listed below, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

Service via overnight delivery, as follows:

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

RECEIVED

APR 21 2011

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

Service via Electronic Mail, as follows

Irwin A. Popowsky, Esq.
Office of Consumer Advocate
5th Floor, Forum Place
555 Walnut Street
Harrisburg, PA 17101
spopowsky@paoca.org

William R. Lloyd, Esq.
Office of Small Business Advocate
300 North Second Street, Suite 1102
Harrisburg, PA 17101
willoyd@state.pa.us

Johnnie E. Simms, Esq.
Office of Trial Staff
Pennsylvania Public Utility Commission
Commonwealth Keystone Bldg., 2nd Fl. West
P.O. Box 3265
Harrisburg, PA 17105-3265
josimms@state.pa.us

Kriss Brown, Esq.
Assistant Counsel
Law Bureau
kribrown@state.pa.us

Dated: April 21, 2011


Kathy J. Kolich
Attorney No. 92203
FirstEnergy Service Company
76 South Main Street
Akron, OH 44309
(330) 384-4580
(330) 384-3875
kkolich@firstenergycorp.com

From: (330) 384-4580
Kathy J. Kolich
FirstEnergy Corp
76 S. Main St.

Origin ID: CAKA



J11151102250225

Akron, OH 44308

Ship Date: 21APR11
ActWgt: 1.0 LB
CAD: 3157553/INET3130

Delivery Address Bar Code



SHIP TO: (717) 712-7777

BILL SENDER

Rosemary Chiavetta, Secretary
PA Public Utility Commission
400 NORTH ST FL 2

Ref # 560600/503001/503001
Invoice # M-2008-2069887
PO # Comments
Dept # Legal - KJK and CMD

HARRISBURG, PA 17120

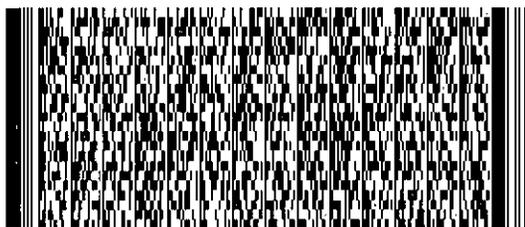
FRI - 22 APR A1
PRIORITY OVERNIGHT

TRK# 7946 7811 5951

0201

17120
PA-US
MDT

NJ MDTA



50DG3126A87/EFB

After printing this label:

1. Use the 'Print' button on this page to print your label to your laser or inkjet printer.
2. Fold the printed page along the horizontal line.
3. Place label in shipping pouch and affix it to your shipment so that the barcode portion of the label can be read and scanned.

Warning: Use only the printed original label for shipping. Using a photocopy of this label for shipping purposes is fraudulent and could result in additional billing charges, along with the cancellation of your FedEx account number.

Use of this system constitutes your agreement to the service conditions in the current FedEx Service Guide, available on fedex.com. FedEx will not be responsible for any claim in excess of \$100 per package, whether the result of loss, damage, delay, non-delivery, misdelivery, or misinformation, unless you declare a higher value, pay an additional charge, document your actual loss and file a timely claim. Limitations found in the current FedEx Service Guide apply. Your right to recover from FedEx for any loss, including intrinsic value of the package, loss of sales, income interest, profit, attorney's fees, costs, and other forms of damage whether direct, incidental, consequential, or special is limited to the greater of \$100 or the authorized declared value. Recovery cannot exceed actual documented loss. Maximum for items of extraordinary value is \$500, e.g. jewelry, precious metals, negotiable instruments and other items listed in our Service Guide. Written claims must be filed within strict time limits, see current FedEx Service Guide.