

**John F. Povilaitis**  
717 237 4825  
john.povilaitis@bipc.com

409 North Second Street  
Suite 500  
Harrisburg, PA 17101-1357  
T 717 237 4800  
F 717 233 0852  
www.buchananingersoll.com

February 13, 2013

**VIA HAND DELIVERY**

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

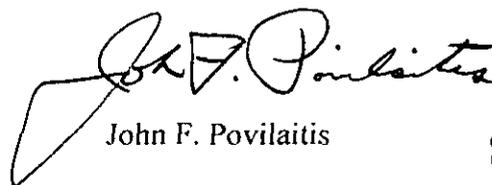
Re: Metropolitan Edison Company's Request for Expedited Approval of Proposed  
Minor Act 129 EE&C Plan Changes Pursuant to the June 10, 2011 Final Order in  
Docket No. M-2008-2069887; Docket No. M-2009-2092222

Dear Secretary Chiavetta:

On behalf of Metropolitan Edison Company, I have enclosed for filing Metropolitan Edison Company's Request for Expedited Approval of Proposed Minor EE&C Plan Changes Pursuant to the June 10, 2011 Final Order in with regard to the above-captioned consolidated proceeding.

Please contact me if you have any questions regarding the forgoing matters. Copies have been served as indicated in the attached certificate of service.

Very truly yours,

  
John F. Povilaitis

JFP/kra  
Enclosure

RECEIVED  
2013 FEB 13 PM 2:44  
PA PUC  
SECRETARY'S BUREAU

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**Metropolitan Edison Company's Request :  
for Expedited Approval of Proposed Minor :  
Act 129 EE&C Plan Changes Pursuant to : Docket No. M-2009-209222  
the June 10, 2011 Final Order in Docket :  
No. M-2008-2069887 :  
: :  
: :  
: :**

---

**METROPOLITAN EDISON COMPANY'S REQUEST FOR EXPEDITED APPROVAL  
OF PROPOSED MINOR EE&C PLAN CHANGES PURSUANT TO THE JUNE 10, 2011  
FINAL ORDER IN DOCKET NO. M-2008-2069887**

---

**Kathy J. Kolich  
Attorney No. 92203  
Carrie M. Dunn  
OH Attorney No. 0076952  
*Pro Hac Vice*  
FirstEnergy Service Company  
76 South Main Street  
Akron, OH 44308  
(330) 384-4580 - Telephone  
(330) 384-3875 - Fax  
[kjkolich@firstenergycorp.com](mailto:kjkolich@firstenergycorp.com)  
[cdunn@firstenergycorp.com](mailto:cdunn@firstenergycorp.com)**

**Dated: February 13, 2013**

**Counsel for:  
Metropolitan Edison Company**

**RECEIVED**  
2013 FEB 13 PM 2:45  
PA PUD  
SECRETARY'S BUREAU

## INTRODUCTION

Pursuant to the Pennsylvania Public Utility Commission's ("Commission"), Final Order dated June 10, 2011 in *Energy Efficiency and Conservation Program*, Docket No. M-2008-2069887 ("June 10 Order"), Metropolitan Edison Company ("Met-Ed" or "Company") hereby requests expedited approval of its proposed minor changes to certain residential programs included in its Amended Act 129 Energy Efficiency and Conservation ("EE&C") Plan, which was approved on May 10, 2012 in Docket No. M-2009-2092222. Specifically, through this request, Met-Ed is proposing to expand the budget for the Residential Energy Efficient Products Program by \$966,000 by decreasing the budget for the Residential Behavioral Modification & Education Program by the same amount. Met-Ed is also proposing to expand the budget for the Residential Direct Load Control Program by \$700,000 by decreasing the budget for the Home Energy Audits & Outreach Program by the same amount.

A red-line/revised version of the relevant portions of Met-Ed's currently approved EE&C Plan, including the appropriate tables and appendices, that illustrates the afore-mentioned changes is attached as Exhibit A.

The proposed minor changes qualify for expedited approval as outlined in the June 10 Order. As discussed below, the need for the program changes described herein is immediate. Therefore, Met-Ed respectfully requests that the Commission staff approve the proposed minor changes described herein consistent with the timelines set forth in the Commission's June 10 Order.

In support of its proposed changes, Met-Ed offers the following:

## BACKGROUND

### A. Initial Plan Filings

1. Med-Ed filed its original EE&C Plan on July 1, 2009. On October 28, 2009, the Commission entered an Order approving in part and rejecting in part the Company's EE&C Plan ("October 28, 2009 Order"). The Commission ordered the Company to submit a revised EE&C plan within 60 days.
2. Met-Ed timely submitted a revised EE&C Plan ("Revised Plan"). By Opinion and Order dated January 28, 2010, the Commission approved in part and rejected in part the Revised Plan. The Commission ordered the Company to submit a further revised EE&C plan within 60 days.
3. On February 5, 2010, Met-Ed filed its Second Revised EE&C Plans ("Second Revised Plan"). On February 26, 2010, the Commission approved the Company's Second Revised Plan, with implementation commencing immediately thereafter.
4. On February 18, 2011, Met-Ed, along with two of its sister Pennsylvania companies (Pennsylvania Electric Company and Pennsylvania Power Company, collectively with Met-Ed, "Companies") filed two Joint Petitions -- one involving expedited approval of certain changes to each of the Companies' Second Revised Plans; the other, involving proposed changes to the Plans that required an evidentiary hearing due to the fact that the changes would result in a budget increase for the Commercial and Industrial customer class. Both joint petitions asked the Commission to amend its February 26, 2010 Order and to approve proposed changes to each of the Companies' Second Revised Plans.

5. In an Order entered March 18, 2011, the Commission approved the Companies' Joint Petition for Expedited Approval of certain changes to their respective Second Revised Plans.
6. On June 28, 2011, an evidentiary hearing was held on the proposed changes that resulted in an increase in each of the Companies' Plan budgets, and, in an Order entered on January 12, 2012, the Commission approved all such proposed changes.
7. On May 18, 2012, Met-Ed filed a Petition requesting an expedited approval of its proposed minor changes to the demand response programs, which was approved by Staff on June 14, 2012. Met-Ed's Second Revised Plan, after factoring in all of the aforementioned approved changes thereto, is hereinafter referred to as the "Current Plan").

**B. June 10, 2011 Order**

8. The June 10 Order provides for an alternative process for Commission review of minor changes to EE&C Plans.
9. First, Electric Distribution Companies ("EDCs") must file proposed changes with the Commission.
10. Interested parties have 15 days to comment on the filing. Reply comments are due 10 days after the initial comments.
11. Within 35 days after filing the proposed minor changes, the Commission Staff must issue a Secretarial Letter approving or disapproving some or all of the proposed changes and may also refer some or all of the proposed changes to the Office of Administrative Law Judge.

12. The June 10 Order only requires Met-Ed to file sufficient documentation to support the proposed minor EE&C Plan changes, to include the affected pages of the plan, a redlined version of the affected pages and an explanation of how the proposed minor changes affect the previously approved plan. These pages have also been attached. In addition, the Commission requires an EDC to post a complete redlined version of its proposed plan on its website for public inspection upon filing.
13. The scope of plan changes eligible for expedited approval are:
- The elimination of a measure that is underperforming, no longer viable for reasons of cost-effectiveness, savings or market penetration or has met its approved budgeted funding, participation level or amount of savings;
  - The transfer of funds from one measure or program to another measure or program within the same customer class; and
  - Adding a measure or changing the conditions of a measure, such as its eligibility requirements, technical description, rebate structure or amount, projected savings, estimated incremental costs, projected number of participants, or other conditions so long the change does not increase the overall costs to that customer class.
14. The proposed minor changes to Met-Ed's Current Plan that are the subject of this request fall within the above categories in that the changes involve the transfer of funds from two programs to two other programs within the same customer class, namely the Residential Customer Class.

**SPECIFIC CHANGES AND EXPLANATIONS FOR CHANGES**

15. The Residential Energy Efficient Products Program has exceeded the Company's projections and is projected to exhaust its approved program budget in March 2013. To allow for the continuity of this program through May 31, 2013, Met-Ed proposes to increase the budget for this program by \$966,000. The Company

projects that this program will exceed its May 31, 2013 program energy savings target.

16. Met-Ed proposes to decrease the funding for the Residential Behavioral Modification & Education Program by \$966,000. This program is projected to be under budget in excess of this amount on May 31, 2013.
17. The Company's Residential Direct Load Control Program ended operations on September 30, 2012 and the Company is in the process of shutting down the program. The Company estimates that operations and contract termination expenses will be in excess of the approved program budget. Therefore, to provide funding for shutting down the program through May 31, 2013, Met-Ed proposes to increase the budget for this program by \$700,000.
18. Met-Ed proposes to decrease the funding for the Home Energy Audits & Outreach Program by \$700,000. This program is projected to be under budget in excess of this amount on May 31, 2013.
19. The budget changes listed above for Residential Energy Efficient Products Program, Residential Behavioral Modification & Education Program, Residential Direct Load Control Program and the Home Energy Audits & Outreach Program will have no effect on the remainder of the Current Plan or the Residential rate reflected in the Company's Rider EEC-C.
20. The impact of these minor budget transfers are summarized in Exhibit A, which includes a table showing the proposed budget reallocations (Met-Ed Proposed Budget Reallocation Table) and revisions to Appendix D-6 from the Company's Current Plan.

21. These budget changes also have negligible impact on the cost-effectiveness of the programs. The anticipated impact on the cost-effectiveness of the programs based on the proposed budget changes is set forth in Exhibit B (Met-Ed TRC Impact Assessment Table).
22. These changes will allow Met-Ed to continue program operations and will best position Met-Ed to achieve the May 31, 2013 energy savings targets required by Act 129.

CONCLUSION

**WHEREFORE**, in light of the foregoing, Met-Ed respectfully asks that Staff approve the proposed changes described herein in accordance with the Commission's June 10, 2011 Final Order in Docket No. M-2009-2092222.

Respectfully submitted,

Dated: February 13, 2013

  
\_\_\_\_\_  
Kathy J. Kolich  
Attorney No. 92203  
Carrie M. Dunn  
OH Attorney No. 0076952  
*Pro Hac Vice*  
FirstEnergy Service Company  
76 South Main Street  
Akron, OH 44308  
(330) 384-4580 - Telephone  
(330) 384-3875 - Fax  
[kjkolich@firstenergycorp.com](mailto:kjkolich@firstenergycorp.com)  
[cdunn@firstenergycorp.com](mailto:cdunn@firstenergycorp.com)

RECEIVED  
2013 FEB 13 PM 2:46  
PA PUC  
SECRETARY'S BUREAU

***1.1.2. Summary of Proposed Minor Changes (filed May 18, 2012)***

Met-Ed proposes to decrease the savings and funding for the C&I Demand Response Program by 6,480kW and \$654,160. This program has proven to be challenging in obtaining participation and is currently only partially subscribed based on contracted commitments. This change will have no effect on the remainder of the Current Plan or Large C&I rate reflected in Rider EEC-C. This budget transfer is demonstrated in Appendix G-Table 3 and Appendix G-Table 6a.

Met-Ed proposes to increase the savings and budget for the Large C&I Equipment Program by 6,480kW and \$654,160, the same amount Met-Ed is decreasing from the Large C&I Demand Response Program. The Large C&I Equipment Program has proven to be extremely popular and the Company has identified additional customer participation and projects that it can provide under this program to achieve additional demand savings during the summer of 2012. This change will have no effect on the remainder of the Current Plan or the Large C&I rate reflected in Rider EEC-C. This budget transfer is demonstrated in Appendices D-4, D-6 and Appendix G-Table 3 and Appendix G-Table 6a.

***1.1.3. Summary of Proposed Minor Changes***

Met-Ed proposes to increase the budget for the Residential Energy Efficiency Products Program by \$966,000 and the Residential Direct Load Control Program by \$700,000. The Residential Energy Efficient Products Program has exceeded the Company's projections and is projected to exhaust its approved program budget in March 2013. The Company is in the process of shutting down the Residential Direct Load Control Program and projects operations and contract termination expenses to be in excess of the approved program budget. These changes will allow Met-Ed to continue program operations for the Residential Energy Efficiency Products Program through May 31, 2013, and for funding associated with shutting down the Residential Direct Load Control Program.

Met-Ed proposes to decrease funding for the Residential Behavioral Modification Program by \$966,000 and the Residential Home Energy Audits & Outreach Program by \$700,000. These programs are projected to be under budget in excess of these amounts on May 31, 2013.

These changes will have no effect on the remainder of the Current Plan or Residential rate reflected in Rider EEC-C. These budget transfers are demonstrated in Appendix D-6.

***1.2. Summary description of process used to develop the EE&C plan and key assumptions used in preparing the plan***

**Process**

Figure 1, below illustrates the process undertaken by the planning team to develop the EE&C Plan:

**Figure 1: FirstEnergy EE&C Plan Development Process**

# Exhibit A

## Met Ed Proposed Budget Reallocation

Program	Current Approved Plan Budget (App D-6)	Proposed Budget	Total Budget Impact
Direct Load Control	\$15,378,504	\$16,078,504	\$700,000
Home Energy Audits and Outreach	\$12,392,190	\$11,692,190	(\$700,000)
EE Products	\$10,386,373	\$11,352,373	\$966,000
Behavioral Modification and Education	\$2,479,299	\$1,513,299	(\$966,000)
Total	\$40,636,366	\$40,636,366	\$0

Appendix D-6  
Per Program Budget Detail

<b>Residential Direct Load Control Program</b>					
<b>Four Year Program Budget</b>		<b>Program Year 1</b>	<b>Program Year 2</b>	<b>Program Year 3</b>	<b>Program Year 4</b>
		Fall 2009	From 6/2010	From 6/2011	From 6/2012
Program Code*		Until-5/2010	Until-5/2011	Until-5/2012	Until-5/2013
		Demand	Demand	Demand	Demand
Total Budget					
<b>Total</b>	<b>\$16,078,504</b>	\$2,803,098	\$6,611,111	\$5,964,296	<b>\$700,000</b>
Utility Labor/Cost***	\$106,571	\$17,761	\$44,855	\$43,955	\$0
Marketing***	\$0	\$0	\$0	\$0	\$0
M&V***	\$71,524	\$11,920	\$30,104	\$29,500	\$0
Retailer Sales Incentive	\$0	\$0	\$0	\$0	\$0
Rebate Processing	\$0	\$0	\$0	\$0	\$0
Retail Store Discount Tracking	\$0	\$0	\$0	\$0	\$0
Service Provider Costs***	<b>\$3,141,370</b>	\$494,680	\$1,249,316	\$1,224,250	<b>\$173,124</b>
Service Provide Equip/Audit	<b>\$9,560,259</b>	\$1,500,830	\$3,802,498	\$3,730,055	<b>\$526,876</b>
Incentive Shipping & Other**	\$0	\$0	\$0	\$0	\$0
Incentive Rebate for Equip**	\$904,950	\$149,525	\$381,000	\$374,425	\$0
Utility/SP O&M	\$2,293,830	\$628,382	\$1,103,338	\$562,111	\$0

\* This code links this budget to the model input tables in file labeled "ME-EC\_Plan\_Appendices-WCharts-Budget"

\*\*Variable based on number of units of participation each year.

\*\*\* Budget line items reflect the results of measure based modeling for the EE Plan filing. Actual program expenditures (e.g. for These budget figures are consistent with those filed with the Pennsylvania PSC under the FirstEnergy EECF. Actual budgets will vary due to vendor contractual agreements and customer participation levels, among other factors out of the utility's control.

Appendix D-6  
Per Program Budget Detail

<b>Residential Direct Load Control Program</b>					
<b>Four Year Program Budget</b>		<b>Program Year 1</b>	<b>Program Year 2</b>	<b>Program Year 3</b>	<b>Program Year 4</b>
		Fall 2009	From 6/2010	From 6/2011	From 6/2012
		Until-5/2010	Until-5/2011	Until-5/2012	Until-5/2013
	Program Code*	Demand	Demand	Demand	Demand
	Total Budget				
<b>Total</b>	\$15,378,504	\$2,803,098	\$6,611,111	\$5,964,296	\$0
Utility Labor/Cost***	\$106,571	\$17,761	\$44,855	\$43,955	\$0
Marketing***	\$0	\$0	\$0	\$0	\$0
M&V***	\$71,524	\$11,920	\$30,104	\$29,590	\$0
Retailer Sales Incentive	\$0	\$0	\$0	\$0	\$0
Rebate Processing	\$0	\$0	\$0	\$0	\$0
Retail Store Discount Tracking	\$0	\$0	\$0	\$0	\$0
Service Provider Costs***	\$2,968,246	\$494,680	\$1,249,316	\$1,224,250	\$0
Service Provide Equip/Audit	\$9,033,383	\$1,500,830	\$3,802,498	\$3,730,055	\$0
Incentive Shipping & Other**	\$0	\$0	\$0	\$0	\$0
Incentive Rebate for Equip**	\$904,950	\$149,525	\$380,000	\$374,425	\$0
Utility/SP O&M	\$2,293,830	\$628,382	\$1,193,338	\$562,111	\$0

\* This code links this budget to the model input tables in file labeled "MEPC\_Plan\_Appendices-WCharts-Budget"

\*\*Variable based on number of units of participation each year

\*\*\* Budget line items reflect the results of measure based modeling for the EE Plan filing. Actual program expenditures (e.g. for these budget figures are consistent with those filed with the Pennsylvania PSC under the FirstEnergy EECP. Actual budgets will vary due to vendor contractual agreements and customer participation levels, among other factors out of the utility's control.

Appendix D-6  
Per Program Budget Detail

<b>Residential Home Energy Audits and Outreach Program</b>					
<b>Four Year Program Budget</b>		<b>Program Year 1</b>	<b>Program Year 2</b>	<b>Program Year 3</b>	<b>Program Year 4</b>
		Fall 2009	From 6/2010	From 6/2011	From 6/2012
		Until-5/2010	Until-5/2011	Until-5/2012	Until-5/2013
	Program Code*	1-Res Audits	1-Res Audits	1-Res Audits	1-Res Audits
	Total Budget				
<b>Total</b>	<b>\$11,692,190</b>	<b>\$1,988,370</b>	<b>\$2,663,121</b>	<b>\$3,870,352</b>	<b>\$3,170,352</b>
Utility Labor/Cost***	\$500,524	\$8,650	\$54,294	\$218,790	\$218,790
Marketing***	\$208,576	\$28,614	\$25,201	\$77,381	\$77,381
M&V***	\$139,631	\$20,596	\$27,835	\$45,600	\$45,600
Retailer Sales Incentive	\$0	\$0	\$0	\$0	\$0
Rebate Processing	\$0	\$0	\$0	\$0	\$0
Retail Store Discount Tracking	\$0	\$0	\$0	\$0	\$0
Service Provider Costs***	\$510,576	\$123,576	\$137,000	\$125,000	\$125,000
Service Provide Equip/Audit	\$0	\$0	\$0	\$0	\$0
Incentive Shipping & Other**	\$0	\$0	\$0	\$0	\$0
Incentive Rebate for Equip**	\$10,332,883	\$1,806,933	\$2,418,790	\$3,403,580	\$2,703,580
Utility/SP O&M	\$0	\$0	\$0	\$0	\$0

\* This code links this budget to the model input tables in file labeled "ME-EC\_Plan\_Appendices-WCharts-Budget"

\*\*Variable based on number of units of participation each year.

\*\*\* Budget line items reflect the results of measure based modeling for the EE Plan filing. Actual program expenditures (e.g. for these budget figures are consistent with those filed with the Pennsylvania PSC under the FirstEnergy EECF. Actual budgets will vary due to vendor contractual agreements and customer participation levels, among other factors out of the utility's control.

Appendix D-6  
Per Program Budget Detail

<b>Residential Home Energy Audits and Outreach Program</b>					
<b>Four Year Program Budget</b>		<b>Program Year 1</b>	<b>Program Year 2</b>	<b>Program Year 3</b>	<b>Program Year 4</b>
		Fall 2009	From 6/2010	From 6/2011	From 6/2012
		Until-5/2010	Until-5/2011	Until-5/2012	Until-5/2013
	Program Code*	1-Res Audits	1-Res Audits	1-Res Audits	1-Res Audits
	Total Budget				
<b>Total</b>	<b>\$12,392,190</b>	<b>\$1,988,369</b>	<b>\$2,663,120</b>	<b>\$3,870,351</b>	<b>\$3,870,351</b>
Utility Labor/Cost***	\$500,524	\$8,650	\$54,294	\$218,790	\$218,790
Marketing***	\$208,576	\$28,614	\$25,201	\$77,381	\$77,381
M&V***	\$139,631	\$20,596	\$27,835	\$45,600	\$45,600
Retailer Sales Incentive	\$0	\$0	\$0	\$0	\$0
Rebate Processing	\$0	\$0	\$0	\$0	\$0
Retail Store Discount Tracking	\$0	\$0	\$0	\$0	\$0
Service Provider Costs***	\$510,576	\$123,576	\$137,000	\$125,000	\$125,000
Service Provide Equip/Audit	\$0	\$0	\$0	\$0	\$0
Incentive Shipping & Other**	\$0	\$0	\$0	\$0	\$0
Incentive Rebate for Equip**	\$11,032,883	\$1,806,933	\$2,488,790	\$3,403,580	\$3,403,580
Utility/SP O&M	\$0	\$0	\$0	\$0	\$0

\* This code links this budget to the model input tables in file labeled "ME/EC\_Plan\_Appendices-WCharts-Budget"

\*\* Variable based on number of units of participation each year

\*\*\* Budget line items reflect the results of measure based modeling for the EE Plan filing. Actual program expenditures (e.g. for these budget figures are consistent with those filed with the Pennsylvania PSC under the FirstEnergy EECF. Actual budgets will vary due to vendor contractual agreements and customer participation levels, among other factors out of the utility's control.

Appendix D-6  
Per Program Budget Detail

<b>Residential Energy Efficient Products Program</b>					
<b>Four Year Program Budget</b>		<b>Program Year 1</b>	<b>Program Year 2</b>	<b>Program Year 3</b>	<b>Program Year 4</b>
		Fall 2009	From 6/2010	From 6/2011	From 6/2012
		Until-5/2010	Until-5/2011	Until-5/2012	Until-5/2013
Program Code*		4-Res-EE P	4-Res-EE P	4-Res-EE P	4-Res-EE P
Total Budget					
<b>Total</b>	<b>\$11,352,373</b>	<b>\$171,853</b>	<b>\$3,431,563</b>	<b>\$3,436,394</b>	<b>\$4,312,562</b>
Utility Labor/Cost***	\$571,758	\$3,377	\$126,233	\$114,642	\$327,506
Marketing***	\$684,986	\$22,916	\$219,262	\$224,679	\$218,129
M&V***	\$129,577	\$450	\$46,104	\$43,372	\$39,652
Retailer Sales Incentive	\$172,024	\$2,000	\$70,818	\$38,803	\$60,403
Rebate Processing	\$133,364	\$1,000	\$43,116	\$35,411	\$53,836
Retail Store Discount Tracking	\$1,199,551	\$25,050	\$325,500	\$325,875	\$523,126
Service Provider Costs***	\$3,128,846	\$49,150	\$864,850	\$861,400	\$1,353,446
Service Provide Equip/Audit	\$0	\$0	\$0	\$0	\$0
Incentive Shipping & Other**	\$0	\$0	\$0	\$0	\$0
Incentive Rebate for Equip**	\$5,332,267	\$67,910	\$1,735,680	\$1,792,212	\$1,736,465
Utility/SP O&M	\$0	\$0	\$0	\$0	\$0

\* This code links this budget to the model input tables in file labeled "ME-EC\_Plan\_Appendices-WCharts-Budget"

\*\*Variable based on number of units of participation each year.

\*\*\* Budget line items reflect the results of measure based modeling for the EE Plan filing. Actual program expenditures (e.g. for these budget figures are consistent with those filed with the Pennsylvania PSC under the FirstEnergy EECF. Actual budgets will vary due to vendor contractual agreements and customer participation levels, among other factors out of the utility's control.

Appendix D-6  
Per Program Budget Detail

<b>Residential Energy Efficient Products Program</b>					
<b>Four Year Program Budget</b>		<b>Program Year 1</b>	<b>Program Year 2</b>	<b>Program Year 3</b>	<b>Program Year 4</b>
		Fall 2009	From 6/2010	From 6/2011	From 6/2012
		Until-5/2010	Until-5/2011	Until-5/2012	Until-5/2013
		4-Res-EE P	4-Res-EE P	4-Res-EE P	4-Res-EE P
Program Code*					
Total Budget					
<b>Total</b>	<b>\$10,386,373</b>	<b>\$171,853</b>	<b>\$3,431,563</b>	<b>\$3,436,394</b>	<b>\$3,346,562</b>
Utility Labor/Cost***	\$351,917	\$3,377	\$126,233	\$114,642	\$107,665
Marketing***	\$684,986	\$22,916	\$219,262	\$224,679	\$218,129
M&V***	\$129,577	\$450	\$46,104	\$43,372	\$39,652
Retailer Sales Incentive	\$144,324	\$2,000	\$70,818	\$39,803	\$32,703
Rebate Processing	\$111,889	\$1,000	\$43,115	\$35,411	\$32,361
Retail Store Discount Tracking	\$1,006,392	\$25,050	\$325,500	\$325,875	\$329,967
Service Provider Costs***	\$2,625,021	\$49,150	\$864,858	\$861,400	\$849,621
Service Provide Equip/Audit	\$0	\$0	\$0	\$0	\$0
Incentive Shipping & Other**	\$0	\$0	\$0	\$0	\$0
Incentive Rebate for Equip**	\$5,332,267	\$67,946	\$1,735,680	\$1,792,212	\$1,736,465
Utility/SP O&M	\$0	\$0	\$0	\$0	\$0

\* This code links this budget to the model input tables in file labeled "ME/EEC\_Plan\_Appendices-WCharts-Budget"

\*\* Variable based on number of units of participation each year

\*\*\* Budget line items reflect the results of measure based modeling for the EE Plan filing. Actual program expenditures (e.g. for these budget figures are consistent with those filed with the Pennsylvania PSC under the FirstEnergy EECF. Actual budgets will vary due to vendor contractual agreements and customer participation levels, among other factors out of the utility's control.

Appendix D-6  
Per Program Budget Detail

<b>Residential Behavioral Modification and Education Program</b>									
<b>Four Year Program Budget</b>		<b>Program Year 1</b>		<b>Program Year 2</b>		<b>Program Year 3</b>		<b>Program Year 4</b>	
		Fall 2009		From 6/2010		From 6/2011		From 6/2012	
		Until-5/2010		Until-5/2011		Until-5/2012		Until-5/2013	
Program Code*		9-Behavioral Modification		9-Behavioral Modification		9-Behavioral Modification		9-Behavioral Modification	
Total Budget									
<b>Total</b>	<b>\$1,513,299</b>	<b>\$1,485</b>	<b>\$74</b>	<b>\$385,074</b>	<b>\$1,126,665</b>				
Utility Labor/Cost***	\$64,353	\$0	\$0	\$10,000	\$54,353				
Marketing***	\$1,708	\$1,485	\$74	\$74	\$74				
M&V***	\$160,883	\$0	\$0	\$25,000	\$135,883				
Retailer Sales Incentive	\$0	\$0	\$0	\$0	\$0				
Rebate Processing	\$0	\$0	\$0	\$0	\$0				
Retail Store Discount Tracking	\$0	\$0	\$0	\$0	\$0				
Service Provider Costs***	\$1,286,356	\$0	\$0	\$350,000	\$936,356				
Service Provide Equip/Audit	\$0	\$0	\$0	\$0	\$0				
Incentive Shipping & Other**	\$0	\$0	\$0	\$0	\$0				
Incentive Rebate for Equip**	\$0	\$0	\$0	\$0	\$0				
Utility/SP O&M	\$0	\$0	\$0	\$0	\$0				

\* This code links this budget to the model input tables in file labeled "ME-EC\_Plan\_Appendices-WCharts-Budget"

\*\*Variable based on number of units of participation each year.

\*\*\* Budget line items reflect the results of measure based modeling for the EE Plan filing. Actual program expenditures (e.g. for promotion, EM&V, Tracking, labor) These budget figures are consistent with those filed with the Pennsylvania PSC under the FirstEnergy EECF. Actual budgets will vary due to vendor contractual agreements and customer participation levels, among other factors out of the utility's control.

Appendix D-6  
Per Program Budget Detail

<b>Residential Behavioral Modification and Education Program</b>					
<b>Four Year Program Budget</b>		<b>Program Year 1</b>	<b>Program Year 2</b>	<b>Program Year 3</b>	<b>Program Year 4</b>
		Fall 2009	From 6/2010	From 6/2011	From 6/2012
		Until-5/2010	Until-5/2011	Until-5/2012	Until-5/2013
	Program Code*	9-Behavioral Modification	9-Behavioral Modification	9-Behavioral Modification	9-Behavioral Modification
	Total Budget				
<b>Total</b>	<b>\$2,479,299</b>	<b>\$1,485</b>	<b>\$74</b>	<b>\$385,074</b>	<b>\$2,092,665</b>
Utility Labor/Cost***	\$64,353	\$0	\$0	\$10,000	\$54,353
Marketing***	\$1,708	\$1,485	\$74	\$74	\$74
M&V***	\$160,883	\$0	\$0	\$25,000	\$135,883
Retailer Sales Incentive	\$0	\$0	\$0	\$0	\$0
Rebate Processing	\$0	\$0	\$0	\$0	\$0
Retail Store Discount Tracking	\$0	\$0	\$0	\$0	\$0
Service Provider Costs***	\$2,252,356	\$0	\$0	\$350,000	\$1,902,356
Service Provide Equip/Audit	\$0	\$0	\$0	\$0	\$0
Incentive Shipping & Other**	\$0	\$0	\$0	\$0	\$0
Incentive Rebate for Equip**	\$0	\$0	\$0	\$0	\$0
Utility/SP O&M	\$0	\$0	\$0	\$0	\$0

\* This code links this budget to the model input tables in file labeled "ME-EECP\_Plan\_Appendices-WCharts-Budget"

\*\*Variable based on number of units of participation each year.

\*\*\* Budget line items reflect the results of measure based modeling for the EECP plan filing. Actual program expenditures (e.g. for promotion, EM&V, Tracking, labor) These budget figures are consistent with those filed with the Pennsylvania PSC under the FirstEnergy EECP. Actual budgets will vary due to vendor contractual agreements and customer participation levels, among other factors out of the utility's control.

## Exhibit B

### Met Ed TRC Impact Assessment

<b>Program</b>	<b>Approved TRC Costs (App G, Table 7A Cumulated) (\$000)</b>	<b>Approved TRC Benefits (App G, Table 7A Cumulated) (\$000)</b>	<b>TRC as Approved</b>	<b>Revised TRC Cost (1) (000)</b>	<b>Revised TRC Benefit (1) (000)</b>	<b>Revised TRC</b>
Direct Load Control	15,379	23,508	1.5	16,079	24,578	1.5
Home Energy Audits and Outreach	14,012	40,753	2.9	13,220	38,451	2.9
EE Products	18,403	71,213	3.9	20,114	77,836	3.9
Behavioral Modification and Education	2,847	4,607	1.6	1,738	2,812	1.6
<b>Total</b>	<b>50,639</b>	<b>140,081</b>	<b>2.8</b>	<b>51,150</b>	<b>143,678</b>	<b>2.8</b>
<b>Sector &amp; Plan</b>	<b>Approved TRC Costs (App G, Table 1) (\$000)</b>	<b>Approved TRC Benefits (App G, Table 1) (\$000)</b>	<b>TRC as Approved</b>	<b>Revised TRC Cost (1) (000)</b>	<b>Revised TRC Benefit (1) (000)</b>	<b>Revised TRC</b>
Residential (exclusive of Low Income) Sector	78,539	202,194	2.6	79,049	205,790	2.6 <sup>1</sup>
<b>Total Plan</b>	<b>170,514</b>	<b>380,333</b>	<b>2.2</b>	<b>171,025</b>	<b>383,929</b>	<b>2.2</b>

(1) Revised TRC Costs and Benefits based on linear extrapolation of approved TRC Costs and Benefits in relation to proposed budget change

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**Met-Ed Company's Request for Expedited** :  
**Approval of Proposed Minor Act 129** :  
**EE&C Plan Changes Pursuant to the June** : **Docket No. M-2009-2092222**  
**10, 2011 Final Order in 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 hand delivery, as follows:

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

Service via First Class and Electronic Mail, as follows

Tanya McCloskey, Esquire  
Christy M. Appleby, Esquire  
Office of Consumer Advocate  
5<sup>th</sup> Floor, Forum Place  
555 Walnut Street  
Harrisburg, PA 17101  
[tmmcloskey@paoca.org](mailto:tmmcloskey@paoca.org)  
[cappleby@paoca.org](mailto:cappleby@paoca.org)

Sharon Webb, Esquire  
Office of Small Business Advocate  
300 North Second Street, Suite 1102  
Harrisburg, PA 17101  
[swebb@pa.gov](mailto:swebb@pa.gov)

Charles Daniel Shields, Esquire  
Carrie B. Wright, Esquire  
Office of Trial Staff  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Bldg., 2<sup>nd</sup> Fl. West  
P.O. Box 3265  
Harrisburg, PA 17105-3265  
[chshields@pa.gov](mailto:chshields@pa.gov)  
[carwright@pa.gov](mailto:carwright@pa.gov)

Harry S. Geller, Esquire  
Patrick Cicero, Esquire  
Pennsylvania Utility Law Project  
118 Locust Street  
Harrisburg, PA 17101  
[hgellerpulp@palegalaid.net](mailto:hgellerpulp@palegalaid.net)  
[pciceropulp@palegalaid.net](mailto:pciceropulp@palegalaid.net)

RECEIVED  
2013 FEB 13 PM 2:46  
PA PUC  
SECRETARY'S BUREAU

Kimberly Childe, Esquire  
Dept. of Environmental Protection  
400 Market Street, 9<sup>th</sup> Floor  
Harrisburg, PA 17101-2301  
[kcilde@pa.gov](mailto:kcilde@pa.gov)

Susan E. Bruce, Esquire  
Vasiliki Karandrikas, Esquire  
Barry Naum, Esquire  
Charis MinCavage, Esquire  
Pamela C. Polacek, Esquire  
McNees Wallace & Nurick LLC  
100 Pine Street  
PO Box 1166  
Harrisburg, PA 17108-1166  
[sbruce@mwn.com](mailto:sbruce@mwn.com)  
[vkandrikas@mwn.com](mailto:vkandrikas@mwn.com)  
[emincavage@mwn.com](mailto:emincavage@mwn.com)  
[bnaum@mwn.com](mailto:bnaum@mwn.com)  
[ppolacek@mwn.com](mailto:ppolacek@mwn.com)

Carolyn Pengidore, Esquire  
Clearchoice Energy  
180 Fort Couch Road, Suite 265  
Pittsburgh, Pa 15241  
[carolyn@clearchoice-energy.com](mailto:carolyn@clearchoice-energy.com)

Daniel Clearfield, Esquire  
Eckert Seamans Cherin & Mellott  
213 Market Street, 8<sup>th</sup> Floor  
Harrisburg, PA 17101  
[dclearfield@eckertseamans.com](mailto:dclearfield@eckertseamans.com)

Lee E. Hartz, Esquire  
Assistant General Counsel  
National Fuel Gas Distribution Corporation  
PO Box 2081  
Erie, PA 16512  
[hartzl@natfuel.com](mailto:hartzl@natfuel.com)

Ruben S. Brown  
The E Cubed Company LLC  
1700 York Avenue, B1  
New York, NY 10128  
[rsbrown@ecubdllc.com](mailto:rsbrown@ecubdllc.com)

Scott H. DeBroff, Esquire  
Rhoads & Sinon LLP  
One South Market Square  
PO Box 1146  
Harrisburg, PA 17108-1146  
[sdebross@rhoads-sinon.com](mailto:sdebross@rhoads-sinon.com)

Thomas J. Sniscak, Esquire  
Hawke McKeon & Sniscak LLP  
100 North 10<sup>th</sup> Street  
PO Box 1778  
Harrisburg, PA 17105  
[tjsniscak@hmslegal.com](mailto:tjsniscak@hmslegal.com)

RECEIVED  
2013 FEB 13 PM 2:46  
PA PUC  
SECRETARY'S BUREAU

Christopher A. Sharp, Esquire  
Christopher A. Lewis, Esquire  
Melanie J. Tambolas, Esquire  
Blank Rome LLP  
One Logan Square  
130 North 18<sup>th</sup> Street  
Philadelphia, PA 19103-6998  
[sharp@blankrome.com](mailto:sharp@blankrome.com)  
[lewis@blankrome.com](mailto:lewis@blankrome.com)  
[tambolas@blankrome.com](mailto:tambolas@blankrome.com)

Brian J. Knipe, Esquire  
Buchanan Ingersoll & Rooney, PC  
409 North Second Street, Suite 500  
Harrisburg, PA 17101-1357  
[brian.knipe@bipc.com](mailto:brian.knipe@bipc.com)

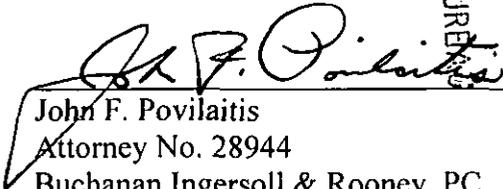
Dated: February 13, 2013

Edward P. Yim, Esquire  
Office of Representative Camille George  
4 East Wing  
PO Box 202074  
Harrisburg, PA 17120  
[eyim@pahouse.net](mailto:eyim@pahouse.net)

RECEIVED

2013 FEB 13 PM 2:46

PA PUC  
SECRETARY'S BUREAU

  
John F. Povilaitis  
Attorney No. 28944  
Buchanan Ingersoll & Rooney, PC  
409 North Second Street, Suite 500  
Harrisburg, PA 17101-1357  
(717) 237-4825 – Telephone  
(717) 233-0852 – Facsimile  
[John.povilaitis@bipc.com](mailto:John.povilaitis@bipc.com)

Kathy J. Kolich  
Attorney No. 92203  
Carrie M. Dunn  
OH Attorney No. 0076952  
*Pro Hac Vice*  
FirstEnergy Service Company  
76 South Main Street  
Akron, OH 44308  
(330) 384-4580 - Telephone  
(330) 384-3875 - Fax  
[kjkolich@firstenergycorp.com](mailto:kjkolich@firstenergycorp.com)  
[cdunn@firstenergycorp.com](mailto:cdunn@firstenergycorp.com)