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May 3, 2013

VIA OVERNIGHT FEDERAL EXPRESS

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

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PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

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 one original and three copies 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 regard to the above-captioned consolidated proceeding.

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

Sincerely,



Carrie M. Dunn

Enclosures

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PA PUBLIC UTILITY COMMISSION
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 :
the June 10, 2011 Final Order in Docket : Docket No. M- -2009-2092222
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

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Dated: May 3, 2013

Counsel for:
Metropolitan Edison Company

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 large commercial and industrial programs included in its current Act 129 Energy Efficiency and Conservation ("EE&C") Plan, of which the Commission last approved changes on March 14, 2013 in Docket No. M-2009-2092222. Specifically, through this request, Met-Ed is proposing to expand the budget for the Large Commercial/Industrial Equipment Program by \$365,000 by decreasing the budget for the PJM Demand Response Program - Large 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 aforementioned 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. Met-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 23, 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.
8. On February 13, 2013, Met-Ed filed a Petition requesting an expedited approval of its proposed minor changes to its Residential Energy Efficient Products Program, Residential Behavioral Modification & Education Program, Home Energy Audits & Outreach Program and Residential Direct Load Control Program, which was approved by Staff on March 14, 2013. (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 Order

9. The June 10 Order provides for an alternative process for Commission review of minor changes to EE&C Plans.
10. First, Electric Distribution Companies ("EDCs") must file proposed changes with the Commission.

11. Interested parties have 15 days to comment on the filing. Reply comments are due 10 days after the initial comments.
12. 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.
13. 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 are also 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.
14. 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.
15. The proposed minor changes to Met-Ed's Current Plan fall within the above categories in that the changes involve the transfer of funds from one program to

another program within the same customer classes, namely the Large C&I Customer Class.

SPECIFIC CHANGES AND EXPLANATIONS FOR CHANGES

16. Met-Ed proposes to increase the budget for the Large Commercial/Industrial Equipment Program by \$365,000. The Company's Large Commercial/Industrial Equipment Program has exceeded the Company's projections and has nearly exhausted its approved program budget. This program has proven to be extremely popular and the Company has identified additional customer projects that it can pursue under this program to achieve additional energy and demand savings. Specifically, the Company has identified over 50 customer projects representing approximately 12,000 MWh of energy savings that it will pursue upon approval of this budget transfer. This program has exceeded its May 31, 2013 program energy savings target.
17. Met-Ed proposes to decrease the funding for the PJM Demand Response Program - Large by \$365,000. Critical program activity occurred during the summer of 2012 and the Company does not anticipate any further significant activity through this program prior to the expiration of the Company's Current Plan on May 31, 2013. This program is projected to be under budget in excess of this amount on May 31, 2013.
18. The budget changes listed above for the Large Commercial/Industrial Equipment Program and the PJM Demand Response Program - Large will have no effect on the remainder of the Current Plan or the Large C&I rate reflected in Rider EEC-C.

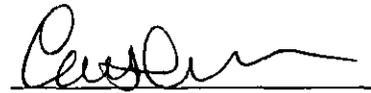
19. The impact of these minor budget transfers are summarized in Exhibit A, which includes a table showing the proposed budget reallocations (Met-Ed Proposed Budget Reallocation Table) and revisions to Appendix D-6 from the Company's Plan.
20. These budget changes also have negligible impact on the cost-effectiveness 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).
21. These changes will allow Met-Ed to continue program operations and support customer participation through May 31, 2013, 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-2008-2069887.

Respectfully submitted,

Dated: May 3, 2013



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Exhibit A

Met Ed Proposed Budget Reallocation

Program	Current Approved Plan Budget (App D-6)	Proposed Budget	Total Budget Impact
C/I Equipment - Large	\$7,932,814	\$8,297,814	\$365,000
PJM Demand Response - Large	\$5,006,415	\$4,641,415	(\$365,000)
Commercial/Industrial Large	\$12,939,229	\$12,939,229	\$0

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Appendix D-6
Per Program Budget Detail

Large Commercial/Industrial Equipment Program					
Four Year Program Budget		Program Year 1	Program Year 2	Program Year 3	Program Year 4
		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-C/I Equip	4-C/I Equip	4-C/I Equip	4-C/I Equip
	Total Budget				
Total	\$8,297,814	\$997,830	\$3,872,995	\$1,449,461	\$1,977,529
Utility Labor/Cost***	\$447,124	\$101,910	\$360,650	\$2,589	-\$18,024
Marketing***	\$117,840	\$60,501	\$40,876	\$10,253	\$6,211
M&V***	\$365,024	\$10,004	\$100,004	\$128,519	\$126,498
Retailer Sales Incentive	\$720	\$60	\$60	\$300	\$300
Rebate Processing	\$1,026,163	\$176,006	\$690,056	\$88,130	\$71,971
Retail Store Discount Tracking	\$0	\$0	\$0	\$0	\$0
Service Provider Costs***	\$0	\$0	\$0	\$0	\$0
Service Provide Equip/Audit	\$0	\$0	\$0	\$0	\$0
Incentive Shipping & Other**	\$0	\$0	\$0	\$0	\$0
Incentive Rebate for Equip**	\$6,340,943	\$649,350	\$2,681,350	\$1,219,670	\$1,790,573
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.

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Per Program Budget Detail

Large Commercial/Industrial Equipment Program					
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Service Provider Costs***	\$0	\$0	\$0	\$0	\$0
Service Provide Equip/Audit	\$0	\$0	\$0	\$0	\$0
Incentive Shipping & Other**	\$0	\$0	\$0	\$0	\$0
Incentive Rebate for Equip**	\$5,975,943	\$649,358	\$2,631,350	\$1,219,670	\$1,425,573
Utility/SP O&M	\$0	\$0	\$0	\$0	\$0

* This code links this budget to the model input tables in file labeled "MEP_C_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.

Exhibit B

Met Ed TRC Impact Assessment

Program	Approved TRC Costs (App G, Table 7A Cumulated) (\$000)	Approved TRC Benefits (App G, Table 7A Cumulated) (\$000)	TRC as Approved	Revised TRC Cost (1) (000)	Revised TRC Benefit (1) (000)	Revised TRC
CI Equipment - Large	32,717	42,229	1.3	34,223	44,172	1.3
Revised Program Total - Commercial/Industrial Large	32,717	42,229	1.3	34,223	44,172	1.3
Sector & Plan	Approved TRC Costs (App G, Table 1) (\$000)	Approved TRC Benefits (App G, Table 1) (\$000)	TRC as Approved	Revised TRC Cost (1) (000)	Revised TRC Benefit (1) (000)	Revised TRC
Commercial/Industrial Large Sector	32,717	42,229	1.3	34,223	44,172	1.3
Total Plan	170,514	380,333	2.2	172,019	382,276	2.2

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

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the June 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 overnight, as follows:

Rosemary Chiavetta, Secretary
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Dated: May 3, 2013



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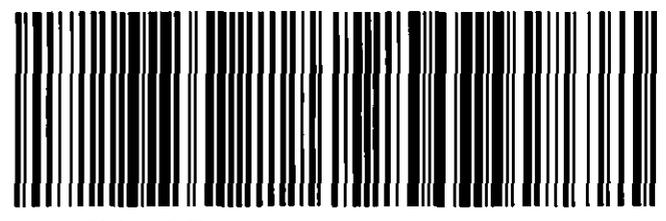
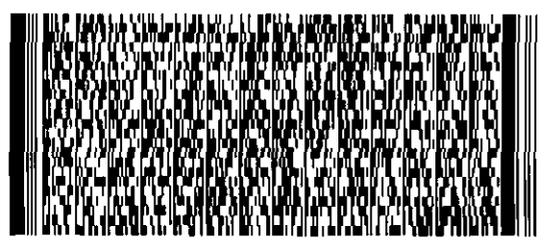
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