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May 15, 2015

VIA ELECTRONIC FILING

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

***Re: Implementation Plan for the Focused Management Audit of
Metropolitan Edison Company, Pennsylvania Electric Company,
Pennsylvania Power Company and West Penn Power Company -
Docket Nos. D-2013-2365991, D-2013-2365992, D-2013-2365993
and D-2013-2365994; Extension Request***

Dear Secretary Chiavetta:

On March 30, 2015, the Pennsylvania Public Utility Commission (“Commission”) issued an Order in the above-referenced matter (“March 30 Order” or “Order”) directing Metropolitan Edison Company, Pennsylvania Electric Company, Pennsylvania Power Company and West Penn Power Company (collectively, “the Companies”) to file a revised implementation plan with respect to certain recommendations raised in their most recent management audit within 60 days of the entry date of the Order, or May 29, 2015. Specifically, the Order addressed twelve audit recommendations¹ covering ten topical areas.² This letter serves as a request for extension of time to comply with limited portions of the March 30 Order – specifically, Ordering Paragraphs 3, 4, 9 and 12.

Directly following receipt of the Order, the Companies initiated a meeting with representatives from the Commission’s Bureau of Technical Utility Services (“TUS”), Bureau of Consumer Services (“BCS”), Law Bureau, and Electric Safety Division (“ESD”) in order to gain input regarding specific characteristics sought to be included as part of the revised plan. Using this

¹ Recommendations III-1, VII-1 through VII-6, X-1, X-2, X-4, X-7, X-8.

² Reliability Benchmarks and Standards; Worst Performing Circuits (“WPCs”); Priority 3 Conditions; Damage Prevention; New Service Installations; Lack of Actual Meter Readings; Overtime and Staffing Levels; Call Centers; Management Performance; and Residential Customer Dispute Response Times.

feedback, the Companies assembled teams of subject matter experts assigned to the individual topics tasked with reviewing, redesigning and building upon the associated elements of the Companies' Implementation Plan as originally submitted on January 8, 2015. After significant internal development on all recommendations, the Companies met with TUS, BCS and Law Bureau on May 13, 2015³ in order to share progress and gain further input on the various plan elements completed to date. Given the significant measure of headway made to this point, the Companies are confident that they will be prepared to submit comprehensive revised plans associated with eight of the twelve subject recommendations by the established due date of May 29, and intend to do so. Despite the Companies' diligent efforts with respect to the remaining four recommendations over this short period, more time is needed to thoroughly develop comprehensive programs to effectively address them – specifically those related to Ordering Paragraphs 3, 4, 9 and 12 of the March 30 Order involving Reliability Benchmarks and Standards, WPCs, Overtime and Staffing Levels, and Management Performance.

Each of the plans resulting from Ordering Paragraphs 3, 4, 9 and 12 are inextricably interrelated in that in order to drive a meaningful impact in the most prudent manner in each these topical areas, each must complement the others from a standpoint of execution, timing, budget and expected outcome. For instance, the efforts that one Company takes with respect to its WPCs will ultimately impact its overall reliability, and these efforts necessarily rely upon a complementary staffing strategy and effective tracking mechanisms to monitor and drive results.

Decisions that are critical to the development of these plans require significant time and careful and thorough analysis. In order to develop programs that the Companies can be confident will effectively address the challenges they face with respect to both reliability and WPCs, thorough engineering studies were initiated to analyze the numerous data points required to identify opportunities to drive improvements and to then design programs to achieve those improvements. Furthermore, careful attention is being dedicated to determining reasonable timelines over which programs can be completed and results realized, in addition to important funding considerations. Therefore, development of plans to address these recommendations has required the significant time of cross-functional teams to review these proposals prior to management review.

Because of the time needed to dedicate the level of detail and analysis required to develop comprehensive and coordinated plans, the Companies are respectfully requesting an extension of time of sixty days for submission of revised plans limited to compliance with Ordering Paragraphs 3, 4, 9 and 12 of the March 30 Order.

³ The Companies are separately consulting with ESD as a follow up in order to accommodate a conflict in schedule.

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Please do not hesitate to contact me with any questions related to this request.

Very truly yours,

A handwritten signature in black ink, appearing to read "Tori L. Giesler". The signature is written in a cursive style with a large initial "T".

Tori L. Giesler

dln
Enclosures

c: Dan Mumford (Bureau of Consumer Services)
Carl Hisiro (Law Bureau)
Dan Searfoorce (Bureau of Technical Utility Services)
Brent Killian (Electric Safety Division)