A. Reliability Enhancement Programs

Metropolitan Edison Company ("Met-Ed" or the "Company") remains committed to providing safe and reliable electric service to its customers and employs various programs to strengthen the durability and flexibility of its electric system. Methods to improve the efficiency, adequacy and reliability of its distribution system are a continual focus. Met-Ed utilizes core programs to support cost-effective and reliable service. These programs include, but are not limited to:

- Vegetation Management
 - Routine cycle tree trimming removes selected incompatible trees within the clearing zone corridor, removes certain defective limbs that are overhanging primary conductors, controls selected incompatible brush, and targets identified off right-of-way priority trees for removal.¹
 - Routine cyclical tree trimming may include removing healthy limbs overhanging primary conductors.
 - A dedicated program has been established in response to damage caused by the Emerald Ash Borer to proactively remove Ash Trees off right-of-way.
 - Post-storm circuit patrols may be performed to target the areas with high treerelated outages. Circuit patrols identify trees damaged in a storm that may eventually lead to a future outage. Once identified, the tree is removed. In addition, damaged equipment identified as part of the circuit patrol is repaired or replaced.
- Load Forecasting and Distribution Planning
 - The load forecasting application is used to estimate future substation and circuit loading based upon historical load data and the planning criteria guidelines are then used to provide a consistent approach for planning the safe, reliable, orderly, and economic expansion of the distribution system.
- Customers Experiencing Multiple Interruptions ("CEMI")
 - The CEMI program provides for distribution line equipment projects focused on reducing the number of outages per customer and the number of customers affected by frequent outages. Met-Ed completed 33 CEMI work requests in 2021.
- Circuit Protection and Sectionalizing
 - Circuit protection and sectionalization is aimed at identifying and correcting or improving coordination between protective devices and isolating smaller segments of the circuit with the goals of ensuring safety and security to the public and employees; maximizing service reliability to customers by reducing the number of customers impacted and the frequency and duration of outages; and minimizing damage to distribution equipment due to overcurrent events. Met-Ed replaced or installed 166 devices in 2021 on circuits which were selected based on overall performance as well as protection needs.

¹ Trees located off the right-of-way that are either dead, diseased, declining, structurally compromised, severely leaning or significantly encroaching onto the right-of-way.

- Circuit Improvement
 - Circuit sections are targeted for upgrades that may include equipment replacement, reconductoring and the creation of circuit ties and loops between radial sections of circuits. When ties and loops are available, circuits can be switched during outages to enable faster service restoration. In 2021, Met-Ed completed one circuit improvement project which established a new circuit tie.
- Circuit Replacement/Rehabilitation
 - To strengthen its electrical system, Met-Ed performs targeted circuit rehabilitation, focusing on circuits having a high rate of equipment and line failure and animal-caused outages. Equipment that may be replaced includes conductor, crossarms, capacitors, insulators, lightning arresters and connectors. Met-Ed completed rehabilitation projects on nine circuits in 2021.
- Remote Sectionalizing (Distribution Automation Preparation)
 - Devices, typically reclosers and switches, are being installed with supervisory control and data acquisition ("SCADA") to allow for remote operation to restore service to customers when an outage occurs. Remote switching eliminates the need to dispatch crews to manually operate the switches, resulting in fewer customers affected and reduced outage duration. Met-Ed installed 59 SCADA devices in 2021.
- Long-Term Infrastructure Improvement Plans ("LTIIP")
 - Met-Ed first began to execute its LTIIP programs in 2016. These plans include expenditures and programs designed to accelerate repair, improvement, or replacement of aging infrastructure in order to adequately maintain and improve the efficiency, safety, adequacy and reliability of the distribution system. On January 16, 2020, Met-Ed's LTIIP for the period beginning January 1, 2020 and ending December 31, 2024 ("LTIIP II") was approved, and implementation of that plan is currently underway. Note that some of the initiatives described above are included in the Company's LTIIP II.

B. Preventative Maintenance Programs

In accordance with 52 Pa. Code § 57.198, every two years Met-Ed files a Biennial Inspection, Maintenance, Repair and Replacement Plan² for approval by the Commission. This Biennial Plan is designed to reduce the risk of outages on the Company's system and form the basis for the Company's inspection and maintenance objectives. The Biennial Plan includes programs to conduct vegetation management, pole inspections, distribution overhead line inspections, distribution transformer inspections, recloser inspections and substation inspections.

These well-established maintenance programs ensure the existing system will continue to operate in a safe and reliable manner and serve to identify any potential system issues so they can be proactively addressed.

² On January 15, 2020, Met-Ed's Biennial Inspection, Maintenance, Repair and Replacement Plan for the period January 1, 2021 through December 31, 2022 was approved by the Commission at Docket No. M-2009-2094773.

C. Capacity Planning

Due to ongoing system enhancements and the hard work of employees and contractors, Met-Ed is able to reliably serve its customers. The primary driver of customer demand this summer is again expected to be warm temperatures across the region.

Met-Ed does not foresee significant concerns with system delivery capacity during the upcoming summer based on its performance during last summer's peak. Ongoing facility enhancements designed to improve reliability, load-bearing upgrades, and customers' adoption of energy efficiency and conservation opportunities are being viewed as additional opportunities to ensure the reliability and capacity availability of the system.

D. 2021/2022 Storm Update and Lessons Learned

In calendar year 2021, Met-Ed had a total of eleven³ storm events, of which one was a major event.

During restoration efforts, working safely and efficiently is the main objective. Regional conference calls are held for preparation and logistics planning. Effective planning allows for the precise deployment of crews, supplies, and equipment. Employees are also staggered around the clock to maximize productivity.

After each significant storm event, Met-Ed leadership conducts post-storm review meetings to identify and disseminate lessons learned which are used to improve the emergency response plan.

From storm review action items identified as a result of 2021 and early 2022 restoration events, Met-Ed has implemented new technology to improve emergency callout efficiency and resource tracking and management. This new process improved resource visibility leading to more strategic resource management throughout storm events.

Also, Met-Ed is preparing for the implementation a new outage management system, which is scheduled to take place in the third quarter of 2022. Benefits of the new system include enhanced system monitoring allowing distribution system operators to respond more quickly to outages; remote configuration to enable the safe isolation of equipment, preventing outages, and allowing for safer and more efficient restoration; and advanced monitoring and control capabilities improving situational awareness and increasing efficiency.

Met-Ed continues to work and strive to safely restore all customers in a timely and efficient manner.

³ "Reportable" is defined as an event where filed reports are necessary to the Pennsylvania Public Utility Commission.

E. 2021 Summer Readiness

Capacitor Inspections – By June 1, 2022, Met-Ed will have inspected all line capacitor banks and completed all necessary repairs or replacements to ensure at least 98% availability.

Substation – By June 1, 2022, Met-Ed will have inspected all substation capacitor banks and completed necessary repairs or replacements to ensure minimum 98% available reactive support. In addition, a review of spare equipment will have been completed. Spare equipment includes voltage regulators and substation cooling items such as transformer fans.

By June 1, 2022, Met-Ed will have cleaned and inspected all transformer cooling systems. Cleaning removes the accumulation of Cottonwood seedlings that are released each May and June. In addition, fans and pumps are inspected and their functionality verified during the cleaning process.

Capacity Additions:

- Middletown Jct. Smith St 115 kV Terminal Upgrades (PJM RTEP s1768.1, s1768.2) Upgrades limiting terminal equipment on the Middletown Jct Smith St 115 kilovolt ("kV") 978 Line. This equipment is in service.
- Hill Tolna 115 kV Terminal Upgrades (PJM RTEP s1762.1, s1762.2) Upgrades limiting terminal equipment on Hill Tolna 115kV 985 line. This equipment is in service.
- Jackson N. Hanover 115 kV Terminal Upgrades Upgrades limiting terminal equipment on Jackson N.Hanover 115kV 968 Line (North Hanover). This equipment is in service.
- **Portland Greystone 230 kV** Upgrades limiting terminal equipment on Portland Greystone 230kV 1007 Line. (Greystone). This equipment is in service.
- Hunterstown Lincoln 115 kV Line and Terminal Upgrades (PJM RTEP b3145)
 Upgrades line and terminal equipment on Hunterstown Lincoln 115kV 962 Line. This equipment is in service.
- Belfast Glendon Northwood 115kV Terminal Upgrades (PJM RTEP b2950) Upgrades limiting terminal equipment on Belfast- Glendon – Northwood 115kV 951 Line (Northwood). This equipment is expected to be in service June 01, 2022.

Transmission Preparedness – An annual transmission readiness review is coordinated by FirstEnergy's Transmission Operations Services department with Met-Ed for the purpose of ensuring the capability and reliability of the system for the summer. The detailed review did not reveal any significant issues for the summer of 2022. Based on the system conditions modeled, the Met-Ed transmission system is expected to sufficiently support the forecasted peak summer loading.

Two aerial maintenance patrols are conducted annually via helicopter by FirstEnergy's Transmission Maintenance section to inspect transmission facilities. The purpose of the

routine patrols is to ensure the integrity of in-service transmission lines to maintain safe and reliable service. Both aerial patrols will be completed by year end.

Emergency Exercise – As part of the FirstEnergy Utilities ("FEU") Emergency Preparedness program, Met-Ed completes an annual emergency exercise. The exercise facilitates the testing and validation of key emergency response roles, systems, and processes. The primary objective of the exercise is to ensure a complete understanding of the restoration process by all participants through exposure to a variety of real-world scenarios and decision-making challenges that could be experienced during actual restoration events. The 2022 emergency exercise has been rescheduled to June 8, 2022.

Event Preparedness – FirstEnergy's in-house meteorologists use highly sophisticated, proprietary data and forecasting models specifically designed to provide actionable intelligence. When predicted weather meets specific criteria, planning and preparation work is immediately initiated, often days before forecasted impact.

As part of the preparation efforts, Met-Ed's executive leadership and operations managers implement the emergency restoration process. Based on available data, resource needs are evaluated, and requests are submitted to the FEU Emergency Operations Center. These requests can include but are not limited to line resources (both internal to FirstEnergy and external), hazard responders, damage assessors, public protectors, vegetation crews, and equipment and material needs. Depending on the predicted magnitude of the event, pre-identified staging areas can be quickly activated to prepare for the efficient deployment of crews and equipment.

Refresher Training – All employees with emergency response roles receive appropriate refresher training at specified intervals to ensure they are immediately deployable when an event impacts the system. Expectations for employees to complete appropriate training and verify all equipment and personal protective equipment are available and in proper working order are communicated each year during emergency exercises and verified by Met-Ed management.

Staffing – Met-Ed is appropriately staffed for the 2022 summer storm season. Met-Ed performs an annual staffing analysis that accounts for attrition, including retirements, to determine the proper staffing levels of craft workers. Met-Ed then enrolls students in the Power Systems Institute ("PSI") based on the results of the analysis. PSI is a two-year program that combines classroom learning with hands-on training. Met-Ed is planning to hire approximately ten line worker graduates and 4 substation electrician graduates in 2022. The objective of the PSI program is to proactively hire a diverse group of individuals that will fulfill the line work and substation electrician staffing needs for Met-Ed. The following colleges have partnered with Met-Ed to support these line worker and substation electrician development:

• Reading Area Community College (for Line and Substation students)

For larger-scale events, Met-Ed is able to supplement its own resources by accessing FirstEnergy's portfolio of operating companies that includes the additional three companies located within Pennsylvania, as well as an additional six operating companies in other jurisdictions. The consistency in standards and work practices employed across all ten of these operating companies enables streamlined resource sharing in a way that promotes both safety and efficiency.

FirstEnergy, for itself and its affiliated operating companies including Met-Ed, is a member of the following Regional Mutual Assistance Groups ("RMAGs") and can call upon them to request additional resources when needed:

- Great Lakes Mutual Assistance Group
- North Atlantic Mutual Assistance Group
- Southeastern Electrical Exchange

A National Response Event can be activated by Edison Electric Institute member utilities when multiple RMAGs cannot adequately support the resource requirements of the requesting utilities. In addition to working with RMAG organizations, FirstEnergy works with non-RMAG utility companies and contractors to secure resources.

F. Storm Response

Outage Restoration Strategy – Depending on the predicted severity of an impending weather event, Met-Ed typically begins preparing for potential outages before severe weather hits. Based on the projected impact to Met-Ed's system, plans are activated so that properly scaled preparations can be made.

Information obtained through various tools and resources is critical to determine the type, number and location of resources needed to assure prompt restoration of service. Line personnel, damage assessors and hazard responders are integral resources in providing initial and ongoing assessments of the damage in the field. Line personnel are equipped with mobile data terminals ("MDT") in their vehicles and enter damage information directly into the MDT. This information is immediately available for viewing in the Outage Management System ("OMS"). The OMS is the central collection point for all relevant information concerning damage reports, assessment and configuration of the electric distribution system. During emergencies that meet triggering criteria, the circuit quarantine process is used for rapid assessment and repair of heavily damaged circuits. Additionally, there are two apps that employees can use on mobile devices to automatically enter damage information into the Company's OMS.

In response to power outages and other systems emergencies, Met-Ed maintains a copy of its Emergency Plan for Service Restoration which provides the guidelines for all common processes and procedures for conducting emergency preparedness, response and service restoration. Further, Met-Ed incorporates a number of Incident Command System principles into its emergency response organization to adhere to the principles and high-level structure of the National Incident Management System as appropriate in an electric utility environment.

Communications and Outreach – External Affairs consultants establish communications with emergency management agencies, local officials, county commissioners, and legislators and their offices in advance of and throughout a storm to keep them apprised of preparation and planning efforts. Communications representatives also contact the media to enlist their help in encouraging customers to prepare for the likely storm events and provide information on who to call if they lose power. Proactive email alerts and phone messages are initiated to key stakeholders alerting them to the potential for extended power outages. These efforts and face-to-face outreach are closely aligned with the Company's service restoration efforts. The Company also provides safety messages via newspapers, radio, and online banner ads.

Met-Ed customers can stay abreast of restoration progress through a variety of means. A customer can access the Storm Restoration Process page of the Company's website to learn about the damage assessment and repair prioritization processes as well as the importance of customer calls and outage reporting during the restoration process. Customers can access the 24/7 Power Center outage map that provides county-by-county information. Through this site users can obtain the number of customers served and the number of customers out of power at the county level as well as estimated time of restoration ("ETR") information. In addition, the 24/7 Power Center outage map shows the status of crews restoring service, and informs customers when crews have been dispatched, when they are working on a repair and when additional crews or equipment are needed to complete restoration work.

Met-Ed's mobile website allows customers to report outages and connect to the 24/7 Power Center outage map which has been optimized for mobile devices. From the mobile site, customers can view personalized outage status for an outage they have reported. The mobile website, as well as the full Met-Ed website, also allow customers to register for outage-related alerts via text messages and/or email. These platforms also provide instructions to use two-way text messaging, an interactive option for customers to report outages and obtain outage updates.

Furthermore, Met-Ed uses Twitter and Facebook to share additional safety reminders, ETRs, updates on restoration efforts, explanations of the restoration process and information about the arrival of additional crews, water and ice locations, and links to other resources such as shelters.

In addition, interactive voice response ("IVR") messaging is used to communicate restoration information to customers. Messaging is also relayed to customers who have called Met-Ed regarding their individual outage. Live agent customer service representatives are available and have the same information at their disposal.

For extended power outages, Communications issues regular news releases and media advisories over both traditional media channels and social media to update customers on the status of power restoration efforts, as well as provide realistic ETRs so customers can plan accordingly. Communications proactively issues safety messaging ranging from avoiding downed wires to properly hooking up and operating generators. The Company also has plans in place to provide free water and ice to customers without service. Once locations have been determined, this information is communicated to customers via the IVR, press releases, social media and the website.

Outage Restoration and Storm Response Best Practices – Met-Ed continues to review each storm event, and many of the practices adopted as mentioned above stemmed from sharing best practices with other utilities, a practice that continues today.