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April 7, 2010

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PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

VIA OVERNIGHT UNITED PARCEL SERVICE

James J. McNulty, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor
Harrisburg, PA 17120

**Re: Proposed Policy Statement Regarding Utility Service Outage
Public Notification Guidelines
Docket No. M-2008-2065532**

Dear Secretary McNulty:

Enclosed for filing are an original and sixteen (16) copies of Comments of Metropolitan Edison Company, Pennsylvania Electric Company and Pennsylvania Power Company pursuant to the Commission's Proposed Policy Statement in the above-captioned docket.

Please date stamp the additional copy and return it to me in the enclosed, postage-prepaid envelope. Please contact me if you have any questions regarding this matter.

Very truly yours,



Bradley A. Bingaman

dln
Enclosures

c: As Per Certificate of Service

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Proposed Policy Statement Regarding :
Utility Service Outage Public Notification : **Docket No. M-2008-2065532**
Guidelines :

**COMMENTS OF METROPOLITAN EDISON COMPANY,
PENNSYLVANIA ELECTRIC COMPANY
AND PENNSYLVANIA POWER COMPANY**

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I. INTRODUCTION

As a direct result of Hurricane Ike which caused electric service interruptions to over 450,000 customers in Pennsylvania, the Pennsylvania Public Utility Commission ("Commission") issued Secretarial Letters to seek information from all jurisdictional electric distribution companies ("EDCs") operating in Pennsylvania regarding their service restoration and public notice practices. Subsequently, responses were filed by the EDCs and public input hearings were conducted to solicit additional information to review EDCs' service outage responses, restoration practices, current and past storm preparation and response practices. Attendance at the public hearings was light and the comments were generally positive. Out of 450,000 customers impacted by outages resulting from Hurricane Ike, only eight residents raised concerns at the hearings about the need for improved communications to the public, and, at the same time, complimented the utilities for their work to restore service following the storm.

The Commission's Bureau of Conservation, Economics and Energy Planning submitted *and the Commission adopted the Electric Distribution Company Service Outage Response and Restoration Practices Report* in April 2009. Consequently, the Commission initiated a

rulemaking proceeding to revise certain regulations on service outages at 52 Pa. Code §§ 67.1, *et seq.*, and reportable incidents at 52 Pa. Code §§ 57.11, 59.11 and 65.2. In addition, the Commission directed that a Policy Statement be issued on these topics.

Metropolitan Edison Company, Pennsylvania Electric Company and Pennsylvania Power Company (the “Companies”) respectfully submit the following comments to the Commission’s Proposed Policy Statement Regarding Utility Service Outage Public Notification Guidelines as it specifically impacts the electric industry in Pennsylvania.¹ Inasmuch as the Companies do not have comments on every section of the proposed policy statement, the comments herein will only address those sections of the proposed policy statement where the Companies wish to offer specific comments and suggestions for the Commission’s consideration.

II. COMMENTS

A. Section 69.1901. Scope.

The Scope of the Proposed Policy Statement is to “provide guidelines to the electric distribution market regarding the restoration practices of service.” The Commission invites comments on whether the policy statement should apply to all utilities in the telephone, electric, gas, water/wastewater industries as well. The Commission recognizes that its existing Policy Statement at 52 Pa. Code §69.1602 only applies to unscheduled interruptions and associated actions of jurisdictional water and wastewater utilities. However, the Commission proposes that a separate policy statement similar to the one applicable to water and wastewater utilities be adopted for electric distribution companies (“EDCs”).

The Companies do not believe that a “one size fits all” approach to utility service outages is appropriate or necessary, and that such a policy statement for the electric utility industry is not

¹ The Companies also support the comments of the Energy Association of Pennsylvania being filed in this proceeding.

needed at this time. The Commission's Policy Statement at 52 Pa. Code §69.1602 was never designed nor intended to apply to all utilities. It was only ever meant to apply to jurisdictional water and wastewater utilities following an investigation into the outage notification practices of that specific utility industry. It would be premature to issue a similar policy statement to the electric industry before evaluating whether the additional provisions are indeed necessary. As more fully explained in the Comments set forth herein, the Companies believe that the Proposed Policy Statement is not needed at this time.

B. Section 69.1902. Notification Guidelines.

1. *Acceptable Methods of Public Notification (Section 69.1902(a))*

The Commission expresses concern that modern technology is being under-utilized by electric distribution companies. The Companies believe such concern may be company-specific and should be further explored with individual companies to better address company-specific utilization of modern technology for public notification purposes. The Companies recognize and appreciate the wide range of demographic participants within their service territories and currently utilize the following methods of advanced communication technology when communicating with their customers:

- Bilingual Interactive Voice Response ("IVR") messages are provided at the distribution circuit level as information becomes available;
- Global messaging, reverse IVR and customer call-backs to provide Estimated Time of Restoration ("ETR") and/or confirm power restoration; and
- Updated website regularly updating outage information.

Any future technological advances to be used to notify the public should consider the usefulness of each technology and the applicability of these technologies to all customers in the applicable company's service territory.

2. Commission Website (Section 69.1902(a)(2))

The Commission seeks comments on the feasibility to EDCs uploading outage information (for long term outages) twice a day to a Commission website. The Commission's proposal is unnecessary and would be unduly burdensome. The Companies currently have an established process that automatically uploads outage information to their internal website. The Commission's proposal would require the Companies to manage and provide technical support for a separate, perhaps dueling and potentially conflicting system, at the precise time the Companies' resources are constrained by efforts to promptly restore service.

3. NIMS Standards and Crisis Communication Plans (Section 69.1902(b)(1))

The Commission notes that Section 69.1902(b) provides that utilities should strive to adopt National Incident Management System ("NIMS") and its Public Information System, but it does not clearly delineate which part of the NIMS principles should apply to the electric industry. Clearly, not all components of NIMS apply to electric utilities and certain provisions may actually conflict with the Companies' negotiated collective bargaining agreements. Notwithstanding, consistent with NIMS, the Companies maintain an electronic version of the FirstEnergy Emergency Plan that is utilized for outages and guides the Companies' actions and responses during major weather events. Further, the Companies' Emergency Plan has five main components, which embody the following NIMS' principles: Preparedness, Anticipation, Assessment, Management and Communications.

4. Coordination (Section 69.1902(b)(2))

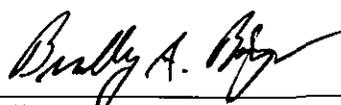
The Proposed Policy Statement also recommends strong consideration be given to implementing a NIMS-based Joint Information System/Joint Information Center. The Companies strongly oppose this recommendation if it is expected that EDC personnel would need to staff the facility. It is critical that key personnel from the Companies be situated on-site

at the Companies in order to timely and effectively access and disseminate important information and resources. It would be very disruptive and counterproductive to have key resources off-site during such critical times. Customers will require specific information from their utility, and a Joint Information Center staffed by EDC personnel would remove vital personnel from a company's operations center and would conflict with the Commission's proposed policy set forth in Section 69.1902(c) regarding the requirement for utilities to have a contact person stationed in the area of an outage to communicate to the public and media on behalf of the EDC.

III. CONCLUSION

The Companies appreciate the opportunity to submit comments to the Proposed Policy Statement. The Companies' Comments are intended to provide a high-level assessment of the Proposed Policy Statement setting forth various reasons why finalizing the Proposed Policy Statement is not necessary at this time. The Companies reserve the right to provide further input through their reply comments.

Respectfully submitted,



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Counsel for:
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Pennsylvania Electric Company and
Pennsylvania Power Company

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PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Proposed Policy Statement Regarding :
Utility Service Outage Public Notification : **Docket No. M-2008-2065532**
Guidelines :

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 by overnight United Parcel Service, as follows:

James J. McNulty, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor
Harrisburg, PA 17120

Service by electronic mail, as follows:

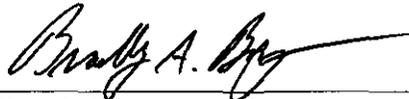
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Dated: April 7, 2010



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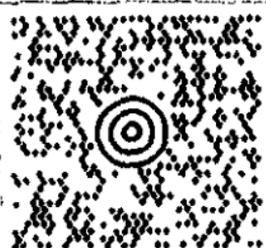
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PA PUBLIC UTILITY COMMISSION
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400 NORTH STREET
HARRISBURG PA 17120-0079



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