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February 13, 2012

VIA ELECTRONIC FILING

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

*Re: Standards for Electronic Data Transfer and Exchange Between
Electric Distribution Companies and Electric Generation Suppliers
Docket No. M-00960890F0015*

Dear Secretary Chiavetta:

Pursuant to the Commission's Tentative Order entered January 13, 2012 in the above-referenced proceeding, enclosed herewith for filing are the Comments of Metropolitan Edison Company, Pennsylvania Electric Company, Pennsylvania Power Company and West Penn Power Company.

Please contact me if you have any questions regarding this matter.

Very truly yours,



Tori L. Giesler

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Enclosures

c: Via Electronic Mail:
Patricia Krise Burket, Assistant Counsel (pburket@pa.gov)
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**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Standards for Electronic Data Transfer :
and Exchange Between Electric : **Docket No. M-00960890F0015**
Distribution Companies and Electric :
Generation Suppliers :

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

I. INTRODUCTION

By Tentative Order entered January 13, 2012 (“Tentative Order”) in the above-captioned matter, the Pennsylvania Public Utility Commission (“Commission”) directed all electric distribution companies (“EDCs”) to implement certain data change controls recommended by the Electronic Data Exchange Working Group (“EDEWG”). The Commission requested that interested parties submit comments on this recommendation within thirty (30) days of entry of the Tentative Order.¹

Metropolitan Edison Company (“Met-Ed”), Pennsylvania Electric Company (“Penelec”), Pennsylvania Power Company (“Penn Power”) and West Penn Power Company (“West Penn”) (collectively, “the Companies”) respectfully submit the following comments for consideration regarding the implementation of EDEWG’s recommended data change controls as set forth in the Tentative Order.

¹ Tentative Order at Ordering Paragraph 3.

II. COMMENTS

The Commission has tentatively recommended two change controls: (i) Change Control #085 (Identification of Net-Metering Customers); and (ii) Change Control #087 (Peak Load Contribution & Network Service Peak Load Values). As a general matter, the Companies generally support the proposed change controls and intend to implement such controls. The Companies do, however, have comments specific to the implementation timeframe proposed and the method of cost recovery called for.

The Commission has recommended that the proposed change controls should be implemented within twelve months of final Commission approval, unless the EDCs have existing plans to make system-wide modifications to incorporate these changes at a later time. The Companies, as pointed out by the Commission in the Tentative Order,² have been researching and developing an implementation plan to incorporate an automated process to provide such information as would be available under both change controls. For this reason, the Companies intend to finalize implementation of these change controls by June 2013, or twelve months following final approval of such changes, whichever is later.

The Commission has further recommended that EDCs be permitted to seek recovery of the costs for such implementation through their next base rate cases. This method of recovery may not provide for full and timely recovery of the implementation costs, thus requiring EDCs to carry such costs for a longer period than necessary. Therefore, the Companies should be permitted to recover the costs of implementation through a reconcilable rider, where an EDC has such a rider. The Companies' respective Default Service Support Riders are designed such that the recovery for implementation of these controls could occur on a full and current basis, thereby

² Tentative Order at 5.

alleviating the need to carry such a cost until such time as the Companies may file their next base rate cases.

III. CONCLUSION

Metropolitan Edison Company, Pennsylvania Electric Company, Pennsylvania Power Company and West Penn Power Company appreciate the opportunity to provide comments regarding the implementation of change controls specific to net metering arrangements and Peak Load Contribution and Network Service Peak Load values.

Respectfully submitted,



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Dated: February 13, 2012

Counsel for:
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Pennsylvania Power Company and West Penn
Power Company

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**Standards for Electronic Data Transfer :
and Exchange Between Electric : Docket No. M-00960890F0015
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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 first class mail and electronic mail, as follows:

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