

September 1, 2015

VIA ELECTRONIC FILING  
Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street, 2<sup>nd</sup> Floor – 1 North  
Harrisburg, PA 17120

**Re: Pennsylvania Electric Company Supplement No. 7 to Tariff Electric Pa. P.U.C. No. 81, Docket No. R-2012-2428743 - Response to 52 Pa. Code § 53.52(a)**

Dear Secretary Chiavetta:

Transmitted herewith for filing with the Pennsylvania Public Utility Commission (“Commission”) are exhibits to support Pennsylvania Electric Company’s (“Penelec” or the “Company”) filing of Tariff Electric Pa. P.U.C. No 81, Supplement 7 which bears an issue date of August 7, 2015 and is proposed to be effective October 6, 2015 (“Supplement”). Specifically, the exhibits required to support the Supplement and which are enclosed herein include those in response to Section 53.52 (a) of the Commission’s regulations.

Copies have been served on all parties as indicated in the attached certificate of service. If you have any questions regarding the enclosed documents, please feel free to contact me.

Sincerely,



Charles V. Fullen

Director – Rates and Regulatory Affairs-PA

Enclosures  
cc: per Certificate of Service

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**PENNSYLVANIA ELECTRIC COMPANY** : **Docket Nos. R-2014-2428743**  
:   
v. :   
:   
**PENNSYLVANIA PUBLIC UTILITY COMMISSION** :

**Request for Approval of a General Base  
Rate Case**

**CERTIFICATE OF SERVICE**

I hereby certify and affirm that I have this day served copies of Supplement No. 7 to **Pennsylvania Electric Company** Tariff No. 81, response to 52 Pa. Code § 53.52(a), upon the following persons in the matter specified in accordance with the requirement of 52 Pa. Code § 1.54:

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Dated: September 1, 2015

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PENNSYLVANIA ELECTRIC COMPANY

Outlined below are the responses of Pennsylvania Electric Company (“Penelec”) to those requirements of 52 Pa. Code § 53.52(a). Responses to subsections (b) through (d) of this section have not been provided as those subsections do not apply to the proposed tariff revisions as filed on August 7, 2015.

52 Pa. Code 53.52(a)

- (1) The specific reasons for each change.

Penelec Electric Pa. P.U.C. No. 81, Supplement 7 was filed on August 7, 2015 (“August 7 Supplement”) to revise the tariff originally issued on May 1, 2015 in compliance with the Pennsylvania Public Utility Commission’s (“Commission”) April 9, 2015 Opinion and Order at Docket No. R-2012-2428743 (“April 9 Order”). These revisions provide correction and clarification to the tariff as issued on May 1, 2015 in order to ensure its consistency with the terms and intent of the Joint Petition for Partial Settlement of Rate Investigation as filed on February 3, 2015 and approved by the Commission’s April 9 Order (“Settlement”). More detailed explanations of each individual revision can be found in the matrix accompanying the August 7 Supplement, and which has been resubmitted as Schedule A to this response..

- (2) The total number of Customers served by the utility.

As of March 2014, the end of the historical test year contemplated by the Settlement, Penelec served a total of 586,250 customers.

- (3) A calculation of the number of Customers, by tariff subdivision, whose bills could be affected by the change.

Any customer bill impacts that will result from these revisions are merely a result of corrections to misstated rates. No bill impacts are expected outside of those already contemplated under the Settlement.

- (4) The effect of the change on the utility’s customers.

Any effects to customers that will result from these revisions are merely a result of corrections and clarifications of previously agreed-upon terms. No customer impacts are expected outside of those already contemplated under the Settlement.

- (5) The direct or indirect effect of the proposed change on the utility’s revenue and expenses.

Any impacts to Penelec's revenues or expenses that will result from these revisions are merely a result of corrections to misstated rates. No revenue or expense are expected outside of those already contemplated under the Settlement.

- (6) The effect of the change on the service rendered by the utility

Any effects to service rendered that will result from these revisions are merely a result of corrections and clarifications of previously agreed-upon terms. No impacts to service rendered by Penelec are expected outside of those already contemplated under the Settlement.

- (7) A list of factors considered by the utility in its determination to make the change. The list shall include a comprehensive statement about why these factors were chosen and the relative importance of each. This subsection does not apply to a portion of a tariff change seeking a general rate increase as defined in 66 Pa.C.S. § 1308 (relating to voluntary changes in rates).

Penelec elected to file these revisions in order to make certain corrections and clarifications to ensure that Penelec Electric Pa. P.U.C. No. 81 would be consistent and in compliance with the terms and intent of the Settlement as approved by the Commission.

- (8) Studies undertaken by the utility in order to draft its proposed change. This paragraph does not apply to a portion of a tariff change seeking a general rate increase as defined in 66 Pa.C.S. § 1308.

No studies were required; the revisions only make certain corrections and clarifications to ensure that Penelec Electric Pa. P.U.C. No. 81 would be consistent and in compliance with the terms and intent of the Settlement as approved by the Commission.

- (9) Customer polls taken and other documents which indicate customer acceptance and desire for the proposed change. If the poll or other documents reveal discernible public opposition, an explanation of why the change is in the public interest shall be provided.

No polls were taken; the revisions only make certain corrections and clarifications to ensure that Penelec Electric Pa. P.U.C. No. 81 would be consistent and in compliance with the terms and intent of the Settlement as approved by the Commission.

- (10) Plans the utility has for introducing or implementing the changes with respect to its ratepayers.

Penelec communicated the impact of the Settlements to customers as relevant at the time its current tariff became effective. Because the revisions only make certain corrections and clarifications to ensure that Penelec Electric Pa. P.U.C. No. 81 would be consistent and in compliance with the terms and intent of the Settlement as approved by the Commission, no additional introduction or implementation is required.

(11) FCC, FERC or Commission orders or rulings applicable to the filing.

A. The following orders or rulings are applicable to the filing:

- Penelec Rate Case order dated April 9, 2015 at Docket No. R-2014-2428743

Renewable Tariff Revisions		Tariff No. 81							
Revision #	Triff Page	Topic	Current Text	Error/Change	Revised Text	Source/Comments			
1	6	Table of Contents	Rider F - Phase II Energy Efficiency & Conservation Charge Rider	Change "&" to "and".	Rider F - Phase II Energy Efficiency and Conservation Charge Rider	Formatting/Grammar			
2	7	Table of Contents	Rider L - Partial Service Rider	Add "s" to Service.	Rider L - Partial Services Rider	Formatting/Grammar			
3	24	On Peak Hours Definition	The Off-peak holidays are New Year's Day, President's Day, Good Friday, Memorial Day, Independence Day, Labor Day, Thanksgiving Day, and Christmas Day.	Remove President's Day and Good Friday.	The Off-peak holidays are New Year's Day, Memorial Day, Independence Day, Labor Day, Thanksgiving Day, and Christmas Day.	Correcting for billing practices.			
4	26	SPVRC Definition	Solar Photovoltaic Requirement Charge Rider	Add "s" to Requirement.	Solar Photovoltaic Requirements: Charge Rider	Formatting/Grammar			
5	50	Rule 10	(9) Billing for Power Factor or Kilowatts...	Capitalize Kilowatts since it is a defined term.	(9) Billing for Power Factor or Kilowatts...	Formatting/Grammar			
6	50, 51	Rule 10 (10)		Moved the rest of Rule 10 (10) on page 51 to page 50.		Formatting/Grammar			
7	64	Rate RS, LOADS IN EXCESS OF 25 KILOWATTS	If the demand so determined under this provision exceeds twenty-five (25) kilowatts, a monthly distribution demand charge of Two Dollars (\$2.00) per kW for all kW shall apply to such excess as set forth in this Provision A, in addition to the General Monthly Charges.	Remove "A" after provision, no longer applies as there is no provision A.	If the demand so determined under this provision exceeds twenty-five (25) kilowatts, a monthly distribution demand charge of Two Dollars (\$2.00) per kW for all kW shall apply to such excess as set forth in this provision, in addition to the General Monthly Charges.	Formatting/Grammar			
8	69	GSM Availability	If an existing Customer's total consumption is less than 1,500 KWH per month for twelve (12) consecutive months, the Customer may no longer be eligible for service under this Rate Schedule GS-Medium.	Remove "twelve (12)" and insert "two (2)".	If an existing Customer's total consumption is less than 1,500 KWH per month for two (2) consecutive months, the Customer may no longer be eligible for service under this Rate Schedule GS-Medium.	Two consecutive months consistent with K.Sicet testimony, Statement 4, page 15, line 11.			
9	69	GSM Availability	If an existing Customer's billing demand exceeds 400 kW for more than two (2) consecutive months in any 12-month period, then the Customer may no longer be eligible for service under this Rate Schedule GS-Medium, and shall be placed on Rate Schedule GS-Large or such other Rate Schedule for which such Customer most qualifies.	Remove "more than" and "in any 12-month period".	If an existing Customer's billing demand exceeds 400 kW for two (2) consecutive months, the Customer may no longer be eligible for service under this Rate Schedule GS-Medium, and shall be placed on Rate Schedule GS-Large or such other Rate Schedule for which such Customer most qualifies.	Source: K.Sicet testimony, Statement 4, page 15, line 11.			
10	69	Rate GS Medium	\$0.21 for each kVA of Reactive Billing Demand for single phase	Remove language.		Metering limitation: Single phase customer meters do not have capability to read kVA.			
11	69, 76	Rate GS Medium, Rate GP	Energy 0.000 cents per kWh for all kWh	Remove language.		Energy charge no longer applies.			
12	70,74			Add language to calculate demand using a formula if customer does not have a demand meter.	Pending the installation of a demand meter, Customer's Demand shall be a formula demand determined by dividing the kilowatt-hour consumption by 200.	Source: K.Sicet testimony, Statement 4, page 19, line 6.			

Revision #	Table	Current Text	Proposed Change	Revised Text	Source/Comments
13	Rate GS Medium, Rate GS Large, Rate GP and Rate LP	A Customer's demand shall be measured by indicating or recording instruments. Demands shall be integrated over 15-minute intervals. The billing demand in the current month shall be the greatest of: (i) the maximum measured demand established in the month during On-peak hours, as stated herein, (ii) forty percent (40%) of the maximum measured demand established in the month during Off-peak hours or (iii) contract demand or (iv) fifty percent (50%) of the highest billing demand established during the preceding eleven (11) months.	Add Metering requirement for On Peak demand calculation.	A Customer's demand shall be measured by indicating or recording instruments. Demands shall be integrated over 15-minute intervals. The billing demand in the current month shall be the greatest of: (i) the maximum measured demand established in the month during On-Peak Hours, as stated herein, (ii) forty percent (40%) of the maximum measured demand established in the month during off-peak hours or (iii) contract demand or (iv) fifty percent (50%) of the highest billing demand established during the preceding eleven (11) months. The on-peak and off-peak provisions of this definition are only applicable for those customers who have installations of non-Interval Time-of-Use demand meters.	Metering limitation.
14	Rate LP	(i) the maximum measured demand established in the month during On-peak hours,	Add "adjusted for Power Factor as stated herein,"	(ii) the maximum measured demand established in the month during On-peak hours, adjusted for Power Factor as stated herein,	Clarifying power factor impact.
15	Rate LP		Add additional paragraph to clarify power factor language.	All measured demands shall be corrected to a Power Factor defined in Rule 7 by multiplying each measured demand by the ratio of the minimum Power Factor requirement set forth in Rule 7 to either the measured Power Factor for that demand or the average Power Factor for the month, whichever is lower, to the nearest 0.1%. No reduction in measured demands shall be made for Power Factor in excess of the stated Power Factors in Rule 7.	Clarifying power factor calculation.
16	Rate LP	LESS THAN 23,000 VOLT DELIVERY:	Currently included as part of General Provision B, should be Provision C.	C. LESS THAN 23,000 VOLT DELIVERY:	Formatting/Grammar
17	Borderline Services		Insert "INVESTMENT CHARGE" between first and second paragraph. Heading is missing.	INVESTMENT CHARGE:	Formatting/Grammar
18	Borderline Services	RIDERS: Bills rendered by the Company under this Service shall include the charges stated in any applicable Rider. Rates identified in this Service include all charges developed and calculated in accordance with all applicable Riders in this Tariff, except for Rider A - Tax Adjustment Surcharge.	Remove text, duplicative text since Riders are listed on page 88.		Formatting/Grammar

Revision #	Topic	Current Text	Error/Change	Revised Text	Source/Comments
19	G. Underground (2)	Requiring removal and replacement of paving or sidewalks at 32,00¢ per foot	Add "per".	Requiring removal and replacement of paving or sidewalks at 32,00¢ per foot	Formatting/Grammar
20	Overhead Area Lighting Service Effective Dates		Remove all effective dates, just provide current rates.		Removing expired rates.
21	Hourly Pricing Default Service Rider	For service rendered September 1, 2015 through November 30, 2015, the EHP rate is as follows:	Change November date as the month has 30 days.	For service rendered September 1, 2015 through November 30, 2015, the EHP rate is as follows:	Type
22	Hourly Pricing Default Service Rider	EHP = ((DSHPExp1 + DSHPExp2 + DSHPExp3) - PTCHPrev + DSHPrint)/DSHPSales X (1 / (1 - T))	Correct formula.	EHP = ((DSHPExp1 + DSHPExp2) - PTCHPrev + DSHPrint)/DSHPSales X (1 / (1 - T))	Correcting formula.
23	Time of Use Default Service Rider K	Installed pursuant to the Penelec Smart Meter Technology Procurement and Installation Plan following approval of that plan by the Commission;	Remove "following approval of that plan by the Commission";	Installed pursuant to the Penelec Smart Meter Technology Procurement and Installation Plan;	Updating for legal status.
24	Time of Use Default Service Rider K	Installed pursuant to the Penelec Smart Meter Technology Procurement and Installation Plan	Add " or were served under Rate Schedule RT as of 5/3/15 and have existing Time-Of-Use metering installed.	Installed pursuant to the Penelec Smart Meter Technology Procurement and Installation Plan or were served under Rate Schedule RT as of 5/3/15 and have existing Time-Of-Use metering installed;	Meter limitations and ensuring availability.
25	Time of Use Default Service Rider K	On Peak and Off Peak Hours The rates for TOU default service are different for On-Peak Hours and Off-Peak Hours during the months of June, July and August, and billed on a service rendered basis. The TOU default service rate for all other months will not reflect an On-Peak or Off-Peak differential. On-Peak Hours are all hours beginning 8:00 AM (8:00 hours) prevailing and ending 8:00 PM (20:00 hours) prevailing each day from Monday through Friday excluding Independence Day. Off-Peak Hours are all hours not identified as On-Peak Hours.	Change on-peak hours and off-peak hours to lower case, add "are" in first sentence, add "for Customers with Smart Meters" in the third sentence and remove "excluding Independence Day.", and add clarification for customers with time-of-use metering (fourth sentence is new).	On Peak and Off Peak Hours The rates for TOU default service are different for on-peak hours and off-peak hours during the months of June, July and August, and are billed on a service rendered basis. The TOU default service rate for all other months will not reflect an on-peak or off-peak differential. On-peak hours for Customers with Smart Meters are all hours beginning 8:00 AM (8:00 hours) prevailing time and ending 8:00 PM (20:00 hours) prevailing time each day from Monday through Friday. For Customers who were served under Rate Schedule RT and have existing Time-Of-Use metering installed, on-peak hours are all hours beginning 9:00 AM (9:00 hours) Eastern Daylight Time (EDT) and ending 9:00 PM (21:00 hours) Eastern Daylight Time each day from Monday through Friday. Off-peak hours are all hours not identified as on-peak hours.	Meters are not programmed to identify and exclude Independence Day.

Revision #	Tariff Page	Topic	Current Text	Energy Change	Revised Text	Source/Comments
26	159	Time of Use Default Service Rider K	In the event the Commission does not approve a standard contract for use between the Company and participating EGSs or no EGS elects to provide TOU default service, Customers enrolled, or electing to enroll, in the TOU default service program will receive service under the terms and conditions of the Company's Price To Compare Default Service Rate Rider, and the TOU Default Service Rate Rider, and the TOU Default Service Rate Rider, and the TOU Default Service Rate Rider (including, without limitation, "E" Factor of such rates). During the Summer Period, the TOU Default rate will be multiplied by 1.28 to establish the TOU Default On-Peak rate during on-peak hours and multiplied by 0.82 to establish the TOU Default Off-Peak rate during off-peak hours.	Change on peak and off peak to lower case.	In the event the Commission does not approve a standard contract for use between the Company and participating EGSs or no EGS elects to provide TOU default service, Customers enrolled, or electing to enroll, in the TOU default service program will receive service under the terms and conditions of the Company's Price To Compare Default Service Rate Rider, and the TOU Default Service Rate Rider, and the TOU Default Service Rate Rider (including, without limitation, "E" Factor of such rates). During the Summer Period, the TOU Default rate will be multiplied by 1.28 to establish the TOU Default On-Peak rate during on-peak hours and multiplied by 0.82 to establish the TOU Default Off-Peak rate during off-peak hours.	Removing conflict with defined term.
27	163	Rider L, Partial Services Rider, (4.)	Backup Service beyond fifteen percent (15%) of the time during a particular consecutive twelve-month period shall be billed to the Customer by the Company as Supplemental Service at the Rate Schedule that would otherwise apply to said Customer.	Add "all" to Supplement.	Backup Service beyond fifteen percent (15%) of the time during a particular consecutive twelve-month period shall be billed to the Customer by the Company as Supplemental Service at the Rate Schedule that would otherwise apply to said Customer.	Formatting/Grammar
28	163	Rider L Billing Demand (7.)	a) the difference between the generating capability of the Customer's generator less the actual amount generated in a 30 minute period as measured by the Customer's metering located on the Customer Generator	Change 30 minutes to 15 minutes.	a) the difference between the generating capability of the Customer's generator less the actual amount generated in a fifteen (15) minute period as measured by the Customer's metering located on the Customer Generator	Correcting copy/paste error.
29	164, 165	Rider L Partial Services Rider	C. 2.	Move C.2 to be B.7.	B.7.	Correcting copy/paste error.