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September 1, 2020

**VIA ELECTRONIC FILING**

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

***Re: Amended Policy Statement on Diversity at Major Jurisdictional Utilities;  
Docket No. M-2020-3018089***

Dear Secretary Chiavetta:

On May 21, 2020, the Pennsylvania Public Utility Commission (“Commission”) issued a Proposed Policy Statement and Order (“Policy Statement Order”) proposing various revisions as updates to the Commission’s existing Statement of Policy at 52 Pa. Code §§ 69.801-69.809, relating to “Diversity at Major Jurisdictional Utility Companies”. In its Policy Statement Order, the Commission outlines each of its proposed revisions and requests input from utilities and other interested stakeholders regarding those proposed revisions.

Metropolitan Edison Company, Pennsylvania Electric Company, Pennsylvania Power Company, and West Penn Power Company (collectively, the “Companies”) offer this letter as input in response to the Commission’s Policy Statement Order. At the outset, the Companies agree with the Commission’s recognition of the fact that its existing Statement of Policy on this topic could be improved by bringing it more current. In addition, the Companies applaud the Commission for recognizing the significant amount of reporting that utilities undertake on this topic separate and apart from those annual reports that the Companies continue to provide to the Commission consistent with Section 69.809. In reading the Commission’s outline of proposed revisions, it is clear that an effort has been made to align the Commission’s Statement of Policy with other reporting obligations in a way intended to drive consistency and reduce administrative burden on reporting utilities. To that end, the Companies join with their peers in offering a number of detailed technical recommendations through the comments of the Energy Association of Pennsylvania, which have been filed on this date, and which the Companies incorporate and adopt herein by reference.

While the Companies and their parent corporation, FirstEnergy Corp. (“FirstEnergy”), have always recognized the value in diversity of workforce and vendors, FirstEnergy has in more recent years placed an more strongly focused eye on reinforcing the importance of this effort across its collective organization. FirstEnergy has established robust programs designed to enhance both

workforce and supplier diversity, which programs it is continually expanding and building upon. Over the past year, FirstEnergy has continued its activities under its Executive Diversity & Inclusion Council, which provides oversight and guidance for the development of FirstEnergy's overall integrated diversity strategy. Part of those efforts include FirstEnergy's Supplier Diversity Program, led by a dedicated team with focused organizational goals for supplier diversity set each year, which are achieved through a portfolio of initiatives, including extensive education and outreach efforts. As a result of this program, FirstEnergy exceeded its 2019 supplier diversity goals, and is eager to see the results of its 2020 efforts. From a workforce diversity perspective, FirstEnergy continues to build on its multi-year roadmap to make diversity key component to the Company's overall success through continuing training and education, workforce surveys and input opportunities, policy updates, and more. These efforts extend to all aspects of the workforce experience – including recruitment, talent management and development, pay equity, employee resource groups, and even the setting of key performance indicators and goals for the leadership team and Board of Directors. As a result of its extensive efforts in this regard, FirstEnergy has been recently recognized by organizations such as Forbes, GI Jobs, Crain's, and Bloomberg for its commitment to diversity in its workforce.

As evidenced by a few of the details outlined above, this topic is one that is near and dear to the entire FirstEnergy community, and the Companies appreciate the opportunity to provide input on an issue of great importance to them and the industry. Should you have any additional questions or concerns, please do not hesitate to contact me.

Very truly yours,



Tori L. Giesler

kbw  
Enclosures

c: As Per Certificate of Service

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

***Amended Policy Statement on Diversity at  
Major Jurisdictional Utilities***

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**Docket No. M-2020-3018089**

**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 electronic mail, as follows:

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Dated: September 1, 2020



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