

Darsh Singh, Esq.
(610) 212-8331
(330) 315-9263 (Fax)

January 9, 2024

VIA ELECTRONIC FILING

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

**Re: Biennial Inspection, Maintenance, Repair and Replacement Plans (2025-2026)
of: Metropolitan Edison Company, Pennsylvania Electric Company,
Pennsylvania Power Company and West Penn Power Company
Docket No. M-2009-2094773**

Dear Secretary Chiavetta:

Pursuant to a Secretarial Letters dated December 28, 2023 in the above-referenced proceeding, Metropolitan Edison Company, Pennsylvania Electric Company, Pennsylvania Power Company, and West Penn Power Company (referred to herein collectively as “FE PA” or the “Company”)¹ were directed to file revised Biennial Inspection, Maintenance, Repair and Replacement Plans (“Plan(s)”) within 30 days which reflect adjusted Distribution Overhead Line Inspections Intervals and Distribution Overhead Transformer Inspections Intervals consistent with 52 Pa. Code § 57.198(n)(4) and (6).

FE PA respectfully requests a 30-day extension to file the directed revision for the reasons detailed herein. Further, the Company will be filing one consolidated Plan, on behalf of FE PA, for January 1 – 2025 through December 31, 2026.

A 30-day extension to file the revisions directed is warranted under the circumstances. First, FE PA has been operating with its current five-year inspection interval for overhead distribution line inspections for over a decade. Shifting to a one to two-year inspection cycle will require several logistical, budgetary and managerial changes that will take FE PA significant time to navigate and implement and must be thoughtfully addressed in the required filing. As such, this change will require coordination and approval between several business units and levels of management, and the prescribed 30-day period will not allow for the Company to fully consider all aspects of what it must address to implement such changes and develop a revised plan.

¹ By Order entered on December 7, 2023, the Pennsylvania Public Utility Commission (the “Commission”) granted certain approvals and certificates of public convenience for the unification of the four Companies into one company, FirstEnergy Pennsylvania Electric Company, or “FE PA”. *Joint Application of Metropolitan Edison Company, Pennsylvania Electric Company, Pennsylvania Power Company, West Penn Power Company, Keystone Appalachian Transmission Company, Mid-Atlantic Interstate Transmission, LLC, and FirstEnergy Pennsylvania Electric Company*, Docket Nos. A-2023-3038771, et al. (Order entered December 7, 2023).

Rosemary Chiavetta, Secretary
January 9, 2024
Page 2

Second, there are substantial difficulties with preparing the required revised Plan by January 29, 2024. Given the December 28th Secretarial Letter issuance, many of the Company's applicable staff were on vacation at the time of issuance and could not begin consideration of this matter until their return, which is exacerbated by year-end financial closings and the flurry of activity in a new fiscal year. The additional time will ensure the Company is able to dedicate the necessary time and consideration to this important matter.

Based on the foregoing, the Company respectfully requests a 30-day extension to file a consolidation Plan on behalf of FE PA such the plan will be due on or before February 28, 2024.

Should you have any questions or concerns, please contact me.

Very truly yours,



Darsh Singh

Enclosures

- c: H. Bidelsbach – Bureau of Technical Utility Services (via electronic mail only)
- D. Searfoorce - Bureau of Technical Utility Services (via electronic email)
- J. Van Zant - Bureau of Technical Utility Services (via electronic email)
- T. Giesler, FirstEnergy
- T. Parmer, FirstEnergy
- S. Wyman, FirstEnergy
- Certificate of Service

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**Biennial Inspection, Maintenance, Repair
and Replacement Plans (2025-2026) of:** : **Docket No. M-2009-2094773**
Metropolitan Edison Company, :
Pennsylvania Electric Company, :
Pennsylvania Power Company and :
West Penn Power Company :
:

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of a Request for Extension upon the individuals listed below, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

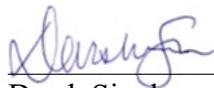
Service by electronic mail as follows:

Office of Small Business Advocate
Suite 1102, Commerce Building
300 North Second Street
Harrisburg, PA 17101
ra-sba@pa.gov

Richard Kanaskie, Director
Bureau of Investigation and Enforcement
Pennsylvania Public Utility Commission
400 North Street 2nd Floor West
Harrisburg, PA 17105-3265
rkanaskie@pa.gov

Patrick M. Cicero
Office of Consumer Advocate
555 Walnut Street – 5th Floor
Harrisburg, PA 17101-1923
pcicero@paoca.org

Dated: January 9, 2024



Darsh Singh
FirstEnergy Service Company
2800 Pottsville Pike
Reading, Pennsylvania 19612-6001
(610) 212-8331
singhd@firstenergycorp.com

Counsel for Metropolitan Edison Company,
Pennsylvania Electric Company, Pennsylvania
Power Company, and West Penn Power Company