

COMMONWEALTH OF PENNSYLVANIA



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January 27, 2025

***Via Electronic Filing (E-Filing)***

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

**RE: FirstEnergy PA Joint Proposed Universal Service and Energy Conservation Plan for 2024-2028; Metropolitan Edison Company Universal Service and Energy Conservation Plan for 2024-2028; West Penn Power Company Universal Service and Energy Conservation Plan for 2024-2028; Pennsylvania Power Company Universal Service and Energy Conservation Plan for 2024-2028; Pennsylvania Electric Company Universal Service and Energy Conservation Plan for 2024-2028.**

**Docket Nos. M-2022-3036532, M-2022-3036533, M-2022-3036534, M-2022-3036535**

**OCA Letter in Lieu of Answer**

Dear Secretary Chiavetta,

On January 7, 2025, FirstEnergy Pennsylvania Electric Company (FE PA or Company) filed its proposed Revised Petition to Amend its 2024-2028 Universal Service and Energy Conservation Plan to reflect the updated health and safety budget, customer consent language in its Low Income Usage Reduction Program, or WARM, application, and the revised PCAP subsidy exemption language. In a September 17, 2024 Secretarial Letter, the Commission also directed FE PA to file in its Plan “parameters and allowance thresholds for performing incidental repairs in its WARM [LIURP] program after consulting with the Company’s Universal Services Advisory Committee (“USAC”) by no than December 31, 2024.” Petition, ¶ 6. The Company was also directed as a part of the March 14, 2024 2024-2028 USECP Order to consult with the USAC to refine the terms and conditions of the customer consent language included in its customer application. Petition, ¶ 7. The Company has addressed both issues with its USAC and includes Attachment A to reflect the updated health and safety budgets and Attachment D to reflect the updated WARM application. Petition, ¶¶ 8-9.

In addition, as the Petition discusses, the Company has also discussed at its USAC meetings the proposal of how to handle PCAP participants who qualify for an exemption. Petition, ¶ 11. The Petition addresses how the Company will address when an account is coded as “exempt” from the PCAP subsidy credit limit, and that the participant will remain exempt until December 31 of the following year. Petition, ¶ 12, Attach. A.

The OCA is filing this Letter in Lieu of Answer to indicate that the OCA does not oppose the proposed changes to the USECP as identified in the Petition and attachments. The OCA has participated in the USAC process where the identified changes were discussed and does not oppose the identified proposed changes.

Respectfully submitted,

/s/ Christy M. Appleby  
Christy M. Appleby  
Senior Assistant Consumer Advocate  
PA Bar ID No. 85824

cc: Certificate of Service  
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## CERTIFICATE OF SERVICE

Joint Universal Service & Energy Conservation : Docket Nos. M-2022-3036532  
Plan of Metropolitan Edison Company, : M-2022-3036533  
Pennsylvania Electric Company, Pennsylvania : M-2022-3036534  
Power Company, and West Penn Power Company : M-2022-3036535  
for Years 2024 – 2028 :

I hereby certify that I have this day served a true copy of the following document, the Office of Consumer Advocate’s Letter in Lieu of Answer, upon parties of record in this proceeding in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant), in the manner and upon the persons listed below. This document was filed electronically on the Commission’s electronic filing system.

Dated this 27th day of January 2025.

### **SERVICE BY E-MAIL ONLY**

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Dated: January 27, 2025