

March 31, 2025

VIA ELECTRONIC FILINGRosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd 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

Dear Secretary Chiavetta:

Enclosed for filing, please find FirstEnergy Pennsylvania Electric Company's ("FE PA" or the "Company") updates to its Consumer Education and Outreach Plan ("CEOP"). The updates include outreach and education actions taken by the Company as required pursuant to the Pennsylvania Public Utility Commission's ("Commission") Order dated March 14, 2024, approving FE PA's Universal Service and Energy Conservation Plan ("USECP") for 2024-2028.

The Company intended to file the update to its CEOP along with its Further Revised 2024 USECP, which was requested pursuant to the Commission's Secretarial Letter issued on February 27, 2025. On March 25, 2025, FE PA filed a letter requesting an extension to file its Further Revised 2024 USECP, and the request was granted by Secretarial Letter on March 28, 2025.

Please let me know if you have any questions or concerns

Very truly yours,



Timothy K. McHugh

Enclosure

c: As Per Certificate of Service
Joseph Magee, Bureau of Consumer Services (jimagee@pa.gov)
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Stephanie Wilson, Law Bureau (stepwilson@pa.gov)

While noting some concerns and areas for follow-up, the Commission accepts FirstEnergy PA's CEOP as a starting point. Accordingly, FirstEnergy PA's proposed CEOP is approved. FirstEnergy PA is directed to note in its Revised 2024 USECP that the CEOP is an evolving process and will be modified and enhanced as needed throughout the duration of the 2024 USECP. Also, beginning in 2024 and for the duration of its 2024 USECP, FirstEnergy PA shall file and serve, by March 1 at these dockets, annual updates to its CEOP which include outreach and education actions taken.

Consumer Education, Outreach and Referral (“CEOP”)

The CEOP is an evolving process and will be modified and enhanced as needed throughout the duration of the 2024 USECP.

As a PCAP participant, customers receive the following communications:

- Enrollment letter;
- Recertification letter;
- Reminder recertification letter with form, if needed;
- Confirmation letter of recertification;
- Removal letter, if needed;
- Subsidy-remaining letters when the customer has exhausted 50% and 80% of the annual limit;
- Quarterly mailings with energy conservation information when participants' usage increased 25% compared to the prior year of service at the same location; and
- Outbound calls are also completed as part of the recertification process.

As a PCAP applicant, customers receive the following outreach:

- Email notifications from the pabillassist.com online application when income documents are required;
- Email notifications 10 days after the pabillassist.com online application is started. If documentation has not been received, a third email notification is sent if not received 20 days after the online application was submitted;
- Outbound calls from the Company to remind the customer the application is pending required documentation; and
- Mailed copy of the PCAP agreement when application is submitted.

Outreach to promote energy assistance program enrollment to customers 0-50% FPIG and higher is completed as follows:

- Outbound call campaigns in the 1st and 4th quarter to promote LIHEAP CASH and CRISIS;
- Participate in the CRISIS Utility File Transfer (UFT) program;
- Participate in the Turn On program, when open;
- Outbound call campaigns to promote PCAP enrollment;
- Email campaigns to promote PCAP enrollment;
- Bill inserts to promote all assistance programs;
- Letters are mailed to LIHEAP recipients that are not on PCAP when household and income information was shared by the Department of Human Services from the LIHEAP application;

- News release to promote all assistance programs twice per year;
- Monthly social media messages to promote an active program or assistance in general;
- Radio commercials to promote LIHEAP or PCAP;
- Corporate website provides information for assistance programs along with an interactive tool to help determine income eligibility;
- On hold message to direct customers to our website for assistance information;
- Provide education and promote enrollment to customers or agencies via Be Utility Wise, senior fairs, expos, etc.;
- Distribute printed materials to community agencies;
- Door hangers for field collections;
- Referral information included on letters related to credit denial, security deposits, termination, etc.;
- Referral information provided to customers during inbound contacts.
- Mail assistance program information to past due low-income customers with income at 250% or less of the federal poverty level during the winter heating season.

The Company makes the following available to Spanish-speaking customers:

- PCAP agreement;
- Program letters include Spanish verbiage;
- PCAP brochures for distribution, live events, or online reference;
- PA LIHEAP bill insert includes Spanish verbiage;
- Dollar Energy Fund is staffed with Spanish-speaking representatives and provides a Spanish option for inbound callers; and
- The Company has interpreting services available for inbound inquiries.

With the implementation of a revised PCAP program, the Company will establish opportunities for community agencies to attend universal service training. A schedule of these events and venue (virtual, in-person or both) will be determined based on the known circumstances, such as weather, health, and safety considerations.

- The Company provided education of the PCAP changes to community business organizations, members of the House and Senate, External Affairs via conference calls on the following dates:
 - January 7 and 8, 2025
 - January 14 and 15, 2025
 - January 22, 23 and 29, 2025
- FirstEnergy presented an overview of the PCAP Changes to the Bureau of Consumer Services on March 11, 2025.
- Additional dates are scheduled for April 2025 for the Department of Human Services and assistance agencies supporting the Dollar Energy Fund program.
- FirstEnergy is participating in Be Utility Wise events planned for the Fall of 2025. Three events are actively being planned – Wilkes-Barre/Scranton, Pittsburgh, and Johnstown.
- FirstEnergy will attend the Westmoreland County Human Services Fair on June 26, 2025. The Company will add events as invitations are received throughout 2025.

For the duration of this USECP, we direct FirstEnergy PA to implement the following steps if its actual annual PCAP costs exceed the annual projected costs, as identified in its 2024 USECP, by more than 20%:

- Notify the Commission and all parties to the 2024 USECP proceeding and its USAC by or before April 1 and provide actual annual PCAP cost information for the preceding year.*
- Schedule a meeting (virtual or in-person) with all interested stakeholders within 30 days of this notification to discuss the costs and receive input on cost controls.*
- File and serve a petition at the 2024 USECP docket proposing additional cost control measures or a letter justifying why no additional cost control measures are needed within 30 days of the stakeholder meeting.*

PROJECTED BUDGET COMPARED TO 2024 ACTUAL SPEND			
DEF Admin (Remuneration, FE Labor,	2024 YE	Projected Budget 2024	% of Projected
Met-Ed	\$ 33,874	\$ 75,000	45%
Penelec	\$ 20,737	\$ 75,000	28%
Penn Power	\$ 9,883	\$ 35,000	28%
West Penn Power	\$ 31,369	\$ 46,500	67%

PCAP Admin	2024 YE	Projected Budget 2024	% of Projected
Met-Ed	\$ 2,263,766	\$ 2,153,346	105%
Penelec	\$ 2,517,136	\$ 2,398,775	105%
Penn Power	\$ 626,560	\$ 625,354	100%
West Penn Power	\$ 2,299,894	\$ 2,310,808	100%

PCAP Bill Subsidy	2024 YE	Projected Budget 2024	% of Projected
Met-Ed	\$ 22,555,652	\$ 22,396,559	101%
Penelec	\$ 25,615,201	\$ 25,446,572	101%
Penn Power	\$ 5,725,379	\$ 5,741,531	100%
West Penn Power	\$ 21,614,202	\$ 21,906,541	99%

PCAP Arrears Forgiveness	2024 YE	Projected Budget 2024	% of Projected
Met-Ed	\$ 1,991,518	\$ 1,940,823	103%
Penelec	\$ 1,923,326	\$ 1,938,829	99%
Penn Power	\$ 483,394	\$ 480,299	101%
West Penn Power	\$ 1,989,088	\$ 2,004,204	99%

CARES Admin	2024 YE	Projected Budget 2024	% of Projected
Met-Ed	\$ 3,645	\$ 5,500	66%
Penelec	\$ 1,172	\$ 3,500	33%
Penn Power	\$ 579	\$ 1,000	58%
West Penn Power	\$ 8,937	\$ 3,500	255%

Gatekeeper Admin	2024 YE	Projected Budget 2024	% of Projected
Met-Ed	\$ 37	\$ 2,000	2%
Penelec	\$ 49	\$ 2,000	2%
Penn Power	\$ -	\$ 1,000	0%
West Penn Power	\$ 87	\$ 2,000	4%

WARM Admin	2024 YE	Projected Budget 2024	% of Projected
Met-Ed	\$ 7,367,337	\$ 10,408,580	71%
Penelec	\$ 8,008,888	\$ 7,890,000	102%
Penn Power	\$ 2,877,328	\$ 3,466,000	83%
West Penn Power	\$ 10,021,943	\$ 11,151,400	90%

The CARES expense for 2024 exceeded the projected annual budget by 20% or more. The cost includes travel and expenses for Be Utility Wise (BUW) meetings for Pittsburgh and a senior fair in West Moreland. The BUW sponsorship fee for the venue was higher than previous years. For training purposes, additional FirstEnergy Human Services team members were present for the meetings. It also includes FirstEnergy labor associated with CARES referrals from the Customer Care Center, which were higher than previous years due to online requests for information.

That FirstEnergy Pennsylvania Electric Company shall file and serve a report at these dockets by April 1 each year where actual PPA forgiveness costs for a 12-month PPA forgiveness in the previous calendar year exceeded the estimates provided in Attachment B of its Supplemental Information by 20% or higher. This report should provide an explanation for the increase in PPA costs and updated projections for the remainder of the USECP years based on 12, 24, and 36 months of PPA forgiveness.

PCAP Arrears Forgiveness	2024 Actual Spend - 36 Month PPA	Third Amended USECP - Compliance Filing	Joint USECP Supplemental Filing 36-Month PPA
Met-Ed	\$ 1,991,518	\$ 1,940,823	\$ 3,557,085
Penelec	\$ 1,923,326	\$ 1,938,829	\$ 3,868,177
Penn Power	\$ 483,394	\$ 480,299	\$ 879,548
West Penn Power	\$ 1,989,088	\$ 2,004,204	\$ 3,868,534

FirstEnergy PA did not implement the 12-month forgiveness until December 15, 2024. The Third Amended USECP 2024-2028 was filed January 7, 2025. The Company is not making a proposed adjustment to the projected budgets at this time.

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Metropolitan Edison Company Universal Service and Energy Conservation Plan for 2024-2028	: : : :	M-2022-3036532
West Penn Power Company Universal Service and Energy Conservation Plan for 2024-2028	: : : :	M-2022-3036533
Pennsylvania Power Company Universal Service and Energy Conservation Plan for 2024-2028	: : : :	M-2022-3036534
Pennsylvania Electric Company Universal Service and Energy Conservation Plan for 2024-2028	: : : :	M-2022-3036535

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true 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 only as follows:

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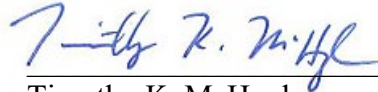
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Dated: March 31, 2025



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