

April 17, 2026

RE FirstEnergy Pennsylvania Electric Company Default Service Plan  
Docket No. P-2026-3060298

To the Pennsylvania Public Utility Commission:

I am submitting this comment to request clarification regarding the proposed treatment of net-metered customer-generators with demand or MRPL of 100 kW and above, who would be reclassified to the Hourly Pricing (HP) Rider under DSP VII.

The Company states in testimony that such customers will be “paid out based on the HP Rider rate” for excess generation. However, the tariff language provided defines the HP Rider as a billing construct for consumption and does not clearly specify how export credits are calculated for net-metered generation.

Accordingly, I respectfully request that the Commission require FirstEnergy Pennsylvania to provide a precise, formula-based definition of export compensation under the HP Rider.

Specifically:

1. For each hourly interval, what exact formula is used to calculate the credit applied to exported kWh from a net-metered customer under the HP Rider?
2. Does the export credit include all components of the HP Rider, including:
  - a. HPEnergy (including HPOth and loss multipliers),
  - b. HPNITS,
  - c. HPCap-AEPS-Other,
  - d. HP Administrative charges,
  - e. HP Uncollectibles, and
  - f. HP Reconciliation charges?
3. If any of these components are excluded from export compensation, please identify which components are excluded and explain the rationale for excluding them while including them in the charges applied to consumption.

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4. Is export compensation calculated on an hourly, interval-specific basis, or through an annual netting or class-level reconciliation mechanism?
  5. If export credits are determined through a class-level reconciliation rather than a direct per-kWh rate, please provide a worked example demonstrating how a customer exporting energy during a defined hour would be compensated.

Clear and transparent definition of export compensation is essential for stakeholders to evaluate whether the proposed HP Rider structure results in symmetrical and equitable treatment of energy imported from and exported to the grid.

Thank you for your consideration of this request.

Respectfully submitted,  
Infinity Capital, LLC