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April 20, 2009

**VIA OVERNIGHT UNITED PARCEL SERVICE**James J. McNulty, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street, 2<sup>nd</sup> Floor  
Harrisburg, PA 17120

**Re:    *Rulemaking to Amend the Provisions of 52 Pa. Code, Chapter 56 to  
Comply with the Provisions of 66 Pa. C.S., Chapter 14; General Review  
of Regulations  
Docket No. L-00060182***

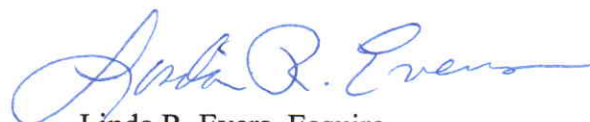
Dear Secretary McNulty:

Enclosed herewith for filing are an original and sixteen (16) copies of Comments of Metropolitan Edison Company, Pennsylvania Electric Company and Pennsylvania Power Company in the above-captioned docket. Please date stamp the additional copy and return it to me in the enclosed, postage-prepaid envelope.

As directed, also enclosed is a diskette containing a copy of the Comments in electronic format.

Please contact me with any questions regarding this matter.

Sincerely,



Linda R. Evers, Esquire

dlm  
Enclosures

c:    As Per Certificate of Service

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**Rulemaking to Amend the Provisions of 52 :  
Pa. Code, Chapter 56 to Comply with the : Docket No. L-00060182  
Provisions of 66 Pa. C.S., Chapter 14; :  
General Review of Regulations :**

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**COMMENTS OF METROPOLITAN EDISON COMPANY,  
PENNSYLVANIA ELECTRIC COMPANY AND  
PENNSYLVANIA POWER COMPANY**

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**Dated: April 20, 2009**

**Counsel for:  
Metropolitan Edison Company,  
Pennsylvania Electric Company and  
Pennsylvania Power Company**

## I. INTRODUCTION

On November 30, 2004, the Governor signed into law Senate Bill 677, or Act 201 of 2004, the Responsible Utility Customer Protection Act (the “Act”). The Act became effective on December 14, 2004, and added Chapter 14 to the Public Utility Code. 66 Pa. C.S. §§ 1401-1418 (“Chapter 14”). This law is intended to protect timely paying customers against rate increases resulting from other customers’ delinquencies, and to eliminate opportunities for customers capable of paying from avoiding the timely payment of their utility bills. 66 Pa. C.S. § 1402(2). Section 6 of the Act requires the Public Utility Commission (“Commission”) to amend 52 Pa. Code §§ 56.1- 56.231, Standards and Billing Practices for Residential Utility Service (“Chapter 56”), to comply with the provisions of Chapter 14, and to promulgate other necessary regulations to administer and enforce the Act.

On December 4, 2006, the Commission issued an Advance Notice of Proposed Rulemaking Order (“ANOPR”) to gather input from interested parties before drafting revised rules and regulations addressing the issues associated with Chapter 14. *Rulemaking to Amend the Provisions of 52 Pa. Code Chapter 56 to Comply with the Provisions of 66 Pa. C.S. Chapter 14 General Review of Regulations*, Docket No. L-00060182 (Advance Notice of Proposed Rulemaking Order issued December 4, 2006). Metropolitan Edison Company, Pennsylvania Electric Company and Pennsylvania Power Company (collectively, “the FirstEnergy Companies” or “the Companies”) submitted Comments to this ANOPR on February 14, 2007.

On September 25, 2008, the Commission adopted a Proposed Rulemaking Order to promulgate proposed regulations to implement Chapter 14. *Rulemaking to Amend the Provisions of 52 Pa. Code, Chapter 56 to Comply with the Provisions of 66 Pa. C.S., Chapter 14; General*

*Review of Regulations*, Docket No. L-00060182 (Proposed Rulemaking Order entered September 26, 2008). In addition to proposing regulations to implement Chapter 14, the Commission is also taking this opportunity to review and propose revisions to Chapter 56. The proposed rulemaking appeared in the *Pennsylvania Bulletin* on February 14, 2009, and invited interested parties to submit comments by April 20, 2009. 39 Pa.B. 925.

The FirstEnergy Companies respectfully submit the following comments in the above-captioned docket in response to the Commission's invitation for comments regarding the proposed rulemaking. The Companies wish to point out that its comments will primarily focus on Subchapters A through K of the proposed regulations since Subchapters L through V only apply to and impact the Companies in their dealings with individuals who are victims under a protection from abuse order. To the extent the Companies' comments that address sections in Subchapters A through K also generally impact similar sections in Subchapters L through V, the Companies request that those comments be applied to those similar sections as well.

## **II. COMMENTS**

Following are the comments of the FirstEnergy Companies addressing specific sections of the proposed rulemaking as set forth in Annex A of the Order and Proposed Rulemaking published in the *Pennsylvania Bulletin* on February 14, 2009. Inasmuch as the FirstEnergy Companies do not have comments on every section of the proposed rulemaking, the comments herein will only address those sections of the proposed rulemaking where the Companies wish to offer specific comments and suggestions for the Commission's consideration.