VIA FEDEX NEXT DAY

May 2, 2011

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

Docket No. M-2008-2069887

Dear Secretary Chiavetta:


The Reply Comments are filed electronically and by express delivery and are deemed filed today pursuant to 52 Pa. Code 51.11.

Very truly yours,

John L. Munsch
Attorney

JLM: sac

Enclosures

c: Kriss E. Brown, Law Bureau – kribrown@state.pa.us
BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Program

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true and correct copy of the Reply Comments of FirstEnergy Affiliates upon the individuals listed below, in accordance with the requirements of 52 Pa. Code 1.54 (relating to service by a participant) by electronic mail and first-class mail, postage prepaid addressed as follows:

Office of Consumer Advocate Office of Small Business Advocate
5th Floor, Forum PI 300 N 2nd St., Ste 1102
555 Walnut St. Harrisburg, PA 17101
Harrisburg, PA 17101 willloyd@state.pa.us
spopowsky@paoca.org

Johnnie E. Simms, Esq. Industrial Energy Consumers of Pennsylvania
Office of Trial Staff McNees Wallace & Nurick, LLC
Pennsylvania Public Utility Commission 100 Pine St.
Commonwealth Keystone Bldg. Harrisburg, PA 17108-1166
400 North Street, 2nd Floor
Harrisburg, PA 17120 josimms@state.pa.us

Dated: May 2, 2011

John L. Munsch
FirstEnergy Corp.
800 Cabin Hill Drive
Greensburg, Pennsylvania 15601
(724) 838-6210
jmunsch@firstenergycorp.com
Attorney I.D. No. 31489
BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION


REPLY COMMENTS OF METROPOLITAN EDISON COMPANY, PENNSYLVANIA ELECTRIC COMPANY, PENNSYLVANIA POWER COMPANY AND WEST PENN POWER COMPANY REGARDING THE TENTATIVE ORDER PROPOSING EXPEDITED PROCESS FOR APPROVAL OF MINOR CHANGES TO EDC ACT 129 EE&C PLANS

Metropolitan Edison Company ("Met-Ed"), Pennsylvania Electric Company ("Penelec"), Pennsylvania Power Company ("Penn Power") and West Penn Power Company (collectively, "the Companies") hereby submit Reply Comments to the Comments of the Industrial Energy Consumers of Pennsylvania ("IECPA") on the Commission's Tentative Order Proposing Expedited Process for Approval of Minor Changes to Electric Distribution Utility Act 129 Energy Efficiency & Conservation ("EE&C") Plans ("Tentative Order"). As member electric distribution companies of the Energy Association of Pennsylvania ("EAP") the Companies support and incorporate by reference herein the EAP's Reply Comments that will be filed by the EAP today. The Companies, however, would like to share an example of where the expedited review process would have been appropriate to review plan changes.

On February 18, 2011, Met-Ed, Penelec and Penn Power filed two Petitions for EE&C plan amendments. One Petition requested immediate, expedited approval for three changes to the three companies' EE&C Plans: (i) an amendment to increase incentives paid for the Residential HVAC and Heat Pump Maintenance/Tune-ups("HVAC Tune-Ups"); (ii) an amendment to add an Energy Conservation Kit offering to Governmental & Institutional customers within the Small Commercial and Industrial ("C/I") Equipment Program; and (iii) an
amendment to increase incentives paid to Governmental & Institutional customers for various measures within the C/I Equipment Programs. The program changes did not affect rates, budgets or other aspects of the companies’ EE&C Plans. Thus, the changes would have fallen under the definition of “minor changes” as proffered by the Commission in the Tentative Order and by EAP in its Comments. Also, none of the stakeholders had any objection to the changes. Although the Commission ruled on the Petition expeditiously, had the expedited process been in effect, the companies would have been able to file the changes under the expedited process and would have saved time and resources for the Commission, the companies and the stakeholders. This is an example of where the expedited process would have been beneficial for all parties involved.

The Companies appreciate the opportunity to comment on the Commission’s Tentative Order and respectfully request that the Commission reject the IECPA’s Comments and adopt the EAP and the Companies’ Comments.

Respectfully submitted,

Dated: May 2, 2011

Kathy J. Kolich
PA Attorney No. 92203
FirstEnergy Service Company
76 South Main Street
Akron, OH 44309
(330) 384-4580
(330) 384-3875
kkolich@firstenergycorp.com
Attorney for Metropolitan Edison Company,
Pennsylvania Electric Company,
Pennsylvania Power Company and
West Penn Power Company