

August 15, 2014

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

Re: Joint Petition of Metropolitan Edison Company, Pennsylvania Electric Company, and Pennsylvania Power Company for Approval of Smart Meter Technology Procurement and Installation Plan – Docket No. M-2009-2123950 Change in Smart Meter Technologies Charge Rates

Dear Secretary Chiavetta:

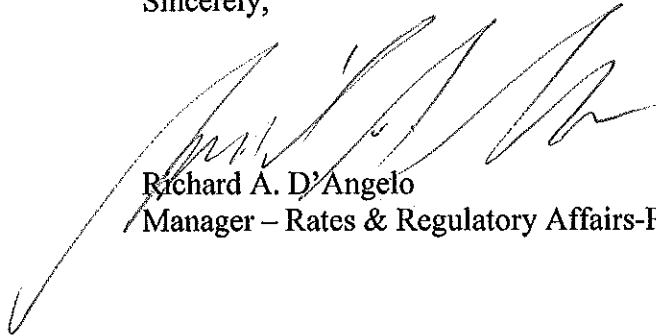
On August 1, 2014, the Pennsylvania Electric Company (“Penelec” or the “Company”) filed its annual filing, which reflected changes in the SMT-C rates for the Residential, Commercial and Industrial Customer Classes. As part of that filing, the Company requested to submit information on cost savings measures achieved from the deployment of smart meters at a later date.

The Company explained in its August 1, 2014, filing that on March 6, 2014, the Commission entered an Order at Docket Nos. M-2013-2341990, M-2013-2341991, M-2013-2341993, and M-2013-2341994 (Metropolitan Edison Company, Pennsylvania Electric Company, Pennsylvania Power Company, and West Penn Power Company, collectively, the (“Companies”) Smart Meter Deployment cases), that directed the Companies to provide information on cost savings measures achieved from the deployment of smart meters and an explanation on how cost savings will be calculated in future SMT-C rate filings. The Companies’ smart meter deployment plan was approved in an Order entered June 25, 2014 and deployment of smart meters commenced in mid-July, 2014. Therefore, the Companies have yet to realize any operational cost savings through the deployment of smart meters.

On August 4, 2014, the Company filed a General Base Rate Filing at Docket No. R-2014-2428743. In that filing, the Company submitted the direct testimony of Laura W. Gifford, Statement No. 7 along with Exhibit LWG-3, which proposed a baseline for purposes of measuring savings achieved from the deployment of smart meters as well as how cost savings resulting from smart meters will be identified and flowed through to customers. The Company respectfully requests that above issues be addressed in the Company’s General Base Rate Case instead of its August 1, 2014, annual SMT-C filing.

If you have any questions regarding the enclosed documents, please contact me at 610-921-6498.

Sincerely,

A handwritten signature in black ink, appearing to read "Richard A. D'Angelo". The signature is fluid and cursive, with a long, sweeping underline that extends to the left.

Richard A. D'Angelo
Manager – Rates & Regulatory Affairs-PA

Enclosures

c: Certificate of Service
Paul Diskin, TUS

Metropolitan Edison Company
 Pennsylvania Electric Company
 Pennsylvania Power Company
 West Penn Power Company

Cost Baseline for Savings as a Result of the Deployment of Smart Meters

<u>Line No.</u>	<u>Description</u>	<u>Met-Ed</u>	<u>Penelec</u>	<u>Penn Power</u>	<u>West Penn</u>	<u>Total</u>
						<u>PA Companies</u>
1	Meter reading (Page 2)	\$ 5,596,570	\$ 5,760,672	\$ 1,548,187	\$ 7,338,454	\$ 20,243,883
2	Meter services (Page 4)	2,424,995	1,942,292	515,189	1,716,634	6,599,110
3	Back-office (Page 6)	686,873	729,613	192,340	1,353,074	2,961,900
4	Contact Center (Page 8)	2,741,626	2,940,535	778,626	3,258,602	9,719,389
5	Theft of service reduction	0	0	0	0	0
6	Revenue enhancement (Page 10)	500,000	484,000	130,000	500,000	1,614,000
7	Avoided capital costs (Page 10)	42,697	54,561	6,135	59,352	162,745
8	Distribution operations	0	0	0	0	0
9	Load research (Page 11)	9,525	13,923	381	5,502	29,331
10	Total	\$ 12,002,286	\$ 11,925,596	\$ 3,170,858	\$ 14,231,618	\$ 41,330,358

**Meter Reading
 Cost Baseline for Smart Meter Benefit
 For the Twelve Months Ending April 2016**

Line No.

<u>Total Meter Reading Costs</u>		<u>Total Headcount</u>	<u>Total</u>
1	<i>Met-Ed</i>	68	\$ 5,596,570
2	<i>Penelec</i>	71	\$ 5,760,672
3	<i>Penn Power</i>	18	\$ 1,548,187
4	<i>West Penn Power</i>	89	\$ 7,338,454

<u>Labor Costs</u>		<u>Headcount</u>	<u>Salary</u>	<u>Severance Costs</u>
5	<i>Met-Ed</i>	68	\$ 4,975,224	\$ _____
6	<i>Penelec</i>	71	\$ 5,216,531	\$ _____
7	<i>Penn Power</i>	18	\$ 1,400,051	\$ _____
8	<i>West Penn Power</i>	89	\$ 6,422,219	\$ _____

<u>Uniforms/Supplies</u>		<u>Uniforms/ Supplies Costs</u>
9	<i>Met-Ed</i>	\$ 27,735
10	<i>Penelec</i>	\$ 37,080
11	<i>Penn Power</i>	\$ 40,885
12	<i>West Penn Power</i>	\$ 48,328

<u>Fleet Costs</u>		<u>Fleet Costs</u>
13	<i>Met-Ed</i>	\$ 593,611
14	<i>Penelec</i>	\$ 507,061
15	<i>Penn Power</i>	\$ 107,251
16	<i>West Penn Power</i>	\$ 867,907

<u>Handheld Costs</u>		<u>Replacement Costs</u>	<u>Maintenance Costs</u>
17	<i>Met-Ed</i>	\$ _____	\$ _____
18	<i>Penelec</i>	\$ _____	\$ _____
19	<i>Penn Power</i>	\$ _____	\$ _____
20	<i>West Penn Power</i>	\$ _____	\$ _____

<u>Claims</u>		<u>Claims Costs</u>
21	<i>Met-Ed</i>	\$ _____
22	<i>Penelec</i>	\$ _____
23	<i>Penn Power</i>	\$ _____
24	<i>West Penn Power</i>	\$ _____

(1) Inputs for Cost Centers 440021 - ME Meter Reading, 450020 - PN Meter Reading South, 450022 - PN Meter Reading North, 433251 - Penn Power Meter Reading, 490144 - West Penn Meter Reading Excluding Waynesboro, 490201 - West Penn Meter Reading Waynesboro from Budget

Meter Reading
Cost Baseline for Smart Meter Benefit by FERC Accounts
For the Twelve Months Ending April 2016

<u>Line No.</u>					
	Salary				
	<i>Met-Ed</i>				
1	FERC Account	593	Maintenance Overhead Lines	\$	177,440
2	FERC Account	902	Meter Reading Expense		4,797,784
3			Total	\$	4,975,224
	<i>Penelec</i>				
4	FERC Account	593	Maintenance Overhead Lines	\$	102,034
5	FERC Account	902	Meter Reading Expense		5,114,497
6			Total	\$	5,216,531
	<i>Penn Power</i>				
7	FERC Account	593	Maintenance Overhead Lines	\$	7,884
8	FERC Account	902	Meter Reading Expense		1,392,167
9			Total	\$	1,400,051
	<i>West Penn Power</i>				
10	FERC Account	593	Maintenance Overhead Lines	\$	111,800
11	FERC Account	902	Meter Reading Expense		6,310,419
12			Total	\$	6,422,219
	<u>Uniform/Supplies Costs</u>				
	<i>Met-Ed</i>				
13	FERC Account	902	Meter Reading Expense	\$	27,735
	<i>Penelec</i>				
14	FERC Account	902	Meter Reading Expense	\$	37,080
	<i>Penn Power</i>				
15	FERC Account	902	Meter Reading Expense	\$	40,885
	<i>West Penn Power</i>				
16	FERC Account	902	Meter Reading Expense	\$	48,328
	<u>Fleet Costs</u>				
	<i>Met-Ed</i>				
17	FERC Account	593	Maintenance Overhead Lines	\$	21,165
18	FERC Account	902	Meter Reading Expense		572,446
19			Total	\$	593,611
	<i>Penelec</i>				
20	FERC Account	593	Maintenance Overhead Lines	\$	9,898
21	FERC Account	902	Meter Reading Expense		497,163
22			Total	\$	507,061
	<i>Penn Power</i>				
23	FERC Account	593	Maintenance Overhead Lines	\$	603
24	FERC Account	902	Meter Reading Expense		106,648
25			Total	\$	107,251
	<i>West Penn Power</i>				
26	FERC Account	593	Maintenance Overhead Lines	\$	15,083
27	FERC Account	902	Meter Reading Expense		852,824
28			Total	\$	867,907

(1) Inputs for Cost Centers 440021 - ME Meter Reading, 450020 - PN Meter Reading South, 450022 - PN Meter Reading North, 433251 - Penn Power Meter Reading, 490144 - West Penn Meter Reading Excluding Waynesboro, 490201 - West Penn Meter Reading Waynesboro from Budget

**Meter Services
 Cost Baseline for Smart Meter Benefit
 For the Twelve Months Ending April 2016**

Line No.

<u>Total Meter Services Costs</u>		Total Headcount	Salary
1	Met-Ed	37	\$ 2,424,995
2	Penelec	35	\$ 1,942,292
3	Penn Power	9	\$ 515,189
4	West Penn Power	26	\$ 1,716,634

<u>Labor Costs - Original Roles</u>		Headcount	Salary	Severance Costs
5	Met-Ed	37	\$ 2,113,014	\$ _____
6	Penelec	35	\$ 1,700,276	\$ _____
7	Penn Power	9	\$ 467,411	\$ _____
8	West Penn Power	26	\$ 1,453,666	\$ _____

<u>Uniforms/Supplies</u>		Uniforms/ Supplies Cost
9	Met-Ed	\$ 112,572
10	Penelec	\$ 145,714
11	Penn Power	\$ 4,450
12	West Penn Power	\$ 117,252

<u>Fleet Costs</u>		Fleet Costs
13	Met-Ed	\$ 199,409
14	Penelec	\$ 96,302
15	Penn Power	\$ 43,328
16	West Penn Power	\$ 145,716

<u>Original Tablet Costs</u>		Replacement Costs	Maintenance Costs
17	Met-Ed	\$ _____	\$ _____
18	Penelec	\$ _____	\$ _____
19	Penn Power	\$ _____	\$ _____
20	West Penn Power	\$ _____	\$ _____

<u>New Device Costs</u>		Costs
21	Met-Ed	\$ _____
22	Penelec	\$ _____
23	Penn Power	\$ _____
24	West Penn Power	\$ _____

<u>Staff Retraining Costs</u>		Cost
25	Met-Ed	\$ _____
26	Penelec	\$ _____
27	Penn Power	\$ _____
28	West Penn Power	\$ _____

<u>Labor Costs - New Roles</u>		Headcount	Salary
29	Met-Ed	_____	\$ _____
30	Penelec	_____	\$ _____
31	Penn Power	_____	\$ _____
32	West Penn Power	_____	\$ _____

(1) Inputs for Cost Centers 440204 Eastern Penn Region Meter Services, 450115 Meter Services, 450116 Meter Services-Northeast L459, 450117 Meter Services-Northwest L459, 450118 Meter Services - South L459, 450119 Meter Services - South L180, 433401 Meter Services - PPCO, 490145 WP Meter Services from Budget

Meter Services
Cost Baseline for Smart Meter Benefit by FERC Accounts
For the Twelve Months Ending April 2016

Line No.				
	<u>Salary</u>			
	<i>Met-Ed</i>			
1	FERC Account	586	Meter Expenses	\$ 425,140
2	FERC Account	593	Maintenance of Overhead Lines	48,026
3	FERC Account	597	Maintenance of Meters	1,829,700
4	FERC Account	920	Admin & Gen Salaries	10,148
5			Total	\$ 2,113,014
	<i>Penelec</i>			
6	FERC Account	586	Meter Expenses	\$ 189,879
7	FERC Account	593	Maintenance of Overhead Lines	147,406
8	FERC Account	597	Maintenance of Meters	1,362,991
9			Total	\$ 1,700,276
	<i>Penn Power</i>			
10	FERC Account	570	Maintenance of Station Equipment	\$ 102
11	FERC Account	588	Misc Distribution Expenses	(1,754)
12	FERC Account	593	Maintenance of Overhead Lines	17,780
13	FERC Account	597	Maintenance of Meters	451,157
14	FERC Account	920	Admin & Gen Salaries	126
15			Total	\$ 467,411
	<i>West Penn Power</i>			
16	FERC Account	586	Meter Expenses	\$ 6,209
17	FERC Account	593	Maintenance of Overhead Lines	64,569
18	FERC Account	597	Maintenance of Meters	1,382,888
19			Total	\$ 1,453,666
	<u>Uniform/Supplies Costs</u>			
	<i>Met-Ed</i>			
20	FERC Account	586	Meter Expenses	\$ 56,290
21	FERC Account	597	Maintenance of Meters	56,282
22			Total	\$ 112,572
	<i>Penelec</i>			
23	FERC Account	586	Meter Expenses	\$ 72,857
24	FERC Account	597	Maintenance of Meters	72,857
25			Total	\$ 145,714
	<i>Penn Power</i>			
26	FERC Account	597	Maintenance of Meters	\$ 4,450
27			Total	\$ 4,450
	<i>West Penn Power</i>			
28	FERC Account	586	Meter Expenses	\$ 117,252
	<u>Fleet Costs</u>			
	<i>Met-Ed</i>			
29	FERC Account	586	Meter Expenses	\$ 40,161
30	FERC Account	593	Maintenance of Overhead Lines	4,540
31	FERC Account	597	Maintenance of Meters	153,765
32	FERC Account	920	Admin & Gen Salaries	943
33			Total	\$ 199,409
	<i>Penelec</i>			
34	FERC Account	586	Meter Expenses	\$ 10,794
35	FERC Account	593	Maintenance of Overhead Lines	8,325
36	FERC Account	597	Maintenance of Meters	77,183
37			Total	\$ 96,302
	<i>Penn Power</i>			
38	FERC Account	570	Maintenance of Station Equipment	\$ 9
39	FERC Account	588	Misc Distribution Expenses	(162)
40	FERC Account	593	Maintenance of Overhead Lines	1,637
41	FERC Account	597	Maintenance of Meters	41,835
42	FERC Account	920	Admin & Gen Salaries	9
43			Total	\$ 43,328
	<i>West Penn Power</i>			
44	FERC Account	586	Meter Expenses	\$ 635
45	FERC Account	593	Maintenance of Overhead Lines	6,472
46	FERC Account	597	Maintenance of Meters	138,609
47			Total	\$ 145,716

(1) Inputs for Cost Centers 440204 Eastern Penn Region Meter Services, 450115 Meter Services, 450116 Meter Services-Northeast L459, 450117 Meter Services-Northwest L459, 450118 Meter Services - South L459, 450119 Meter Services - South L180, 433401 Meter Services - PPCO, 490145 WP Meter Services from Budget

Back Office
Cost Baseline for Smart Meter Benefit
For the Twelve Months Ending April 2016

Line No.

	<u>Total Back Office Costs</u>	<u>Headcount</u>	<u>Salary</u>
1	<i>Met-Ed</i>	9	\$ 686,873
2	<i>Penelec</i>	10	\$ 729,613
3	<i>Penn Power</i>	3	\$ 192,340
4	<i>West Penn Power</i>	23	\$ 1,353,074

	<u>Labor Costs</u>	<u>Headcount</u>	<u>Salary</u>	<u>Severance Costs</u>
5	<i>Met-Ed</i>	9	\$ 686,873	\$ -
6	<i>Penelec</i>	10	\$ 729,613	\$ -
7	<i>Penn Power</i>	3	\$ 192,340	\$ -
8	<i>West Penn Power</i>	23	\$ 1,353,074	\$ -

(1) Inputs for Cost Centers 509035 – Customer Accounting (OH), 506208 – Customer Accounting (South), 509061 – Customer Accounting (NJ) from Budget

Back Office
Cost Baseline for Smart Meter Benefit by FERC Accounts
For the Twelve Months Ending April 2016

<u>Line No.</u>		<u>FERC Account</u>	<u>Description</u>	<u>Amount</u>
	Salary			
	<i>Met-Ed</i>			
1	FERC Account	903	Cust Rcrd & Collect Exp	\$ 686,873
2			Total	\$ 686,873
	<i>Penelec</i>			
3	FERC Account	903	Cust Rcrd & Collect Exp	\$ 729,613
4			Total	\$ 729,613
	<i>Penn Power</i>			
5	FERC Account	902	Meter Reading Expense	\$ 134,636
6	FERC Account	903	Cust Rcrd & Collect Exp	57,704
7			Total	\$ 192,340
	<i>West Penn Power</i>			
8	FERC Account	902	Meter Reading Expense	\$ 448,242
9	FERC Account	923	Outside Svcx Employed	904,832
10			Total	\$ 1,353,074

(1) Inputs for Cost Centers 509035 – Customer Accounting (OH), 506208 – Customer Accounting (South), 509061 – Customer Accounting (NJ) from Budget

**Contact Center
 Cost Baseline for Smart Meter Benefit
 For the Twelve Months Ending April 2016**

Line No.

<u>Total Contact Center Costs</u>		<u>Total Headcount</u>	<u>Salary</u>
1	<i>Met-Ed</i>	59	\$ 2,741,626
2	<i>Penelec</i>	63	\$ 2,940,535
3	<i>Penn Power</i>	17	\$ 778,626
4	<i>West Penn Power</i>	70	\$ 3,258,602

<u>Labor Costs</u>		<u>Headcount</u>	<u>Salary</u>	<u>Severance Costs</u>
5	<i>Met-Ed</i>	59	\$ 2,741,626	\$ -
6	<i>Penelec</i>	63	\$ 2,940,535	\$ -
7	<i>Penn Power</i>	17	\$ 778,626	\$ -
8	<i>West Penn Power</i>	70	\$ 3,258,602	\$ -

(1) Inputs for Cost Centers 509057 - FECC Command Center, 509053 - FECC Ops Akron, 509051 - FECC Admin Akron, 509058 - FECC Admin Reading, 509059 - FECC Ops Reading, 509086 - FECC Ops Akron - Toledo, 509321 - FECC Ops Fairmont, 509322 - FECC Admin Fairmont, 501088 - FECC Quality Monitoring, 509351 - Customer Self-Service, from Budget

Contact Center
Cost Baseline for Smart Meter Benefit by FERC Accounts
For the Twelve Months Ending April 2016

<u>Line No.</u>	<u>FERC Account</u>	<u>Description</u>	<u>Amount</u>
Salary			
Met-Ed			
1	FERC Account 903	Cust Rcrd & Collect Exp	\$ 285,781
2	FERC Account 910	Misc Cust Svc & Info Exp	2,455,845
3		Total	<u>\$ 2,741,626</u>
Penelec			
4	FERC Account 903	Cust Rcrd & Collect Exp	\$ 320,876
5	FERC Account 910	Misc Cust Svc & Info Exp	2,619,659
6		Total	<u>\$ 2,940,535</u>
Penn Power			
7	FERC Account 903	Cust Rcrd & Collect Exp	\$ 70,191
8	FERC Account 910	Misc Cust Svc & Info Exp	708,435
9		Total	<u>\$ 778,626</u>
West Penn Power			
10	FERC Account 902	Meter Reading Expense	\$ 2,859,928
11	FERC Account 903	Cust Rcrd & Collect Exp	252,159
12	FERC Account 910	Misc Cust Svc & Info Exp	146,515
13		Total	<u>\$ 3,258,602</u>

(1) Inputs for Cost Centers 509057 - FECC Command Center, 509053 - FECC Ops Akron, 509051 - FECC Admin Akron, 509058 - FECC Admin Reading, 509059 - FECC Ops Reading, 509086 - FECC Ops Akron - Toledo, 509321 - FECC Ops Fairmont, 509322 - FECC Admin Fairmont, 501088 - FECC Quality Monitoring, 509351 - Customer Self-Service, from Budget

**Revenue Enhancement and Avoided Capital Costs
 Cost Baseline for Smart Meter Benefit
 For the Twelve Months Ending April 2016**

Revenue Enhancement -- Change 1.5 day lag in Cash Working Capital

<u>Line No.</u>		<u>Met-Ed</u>	<u>Penelec</u>	<u>Penn Power</u>	<u>West Penn</u>	<u>Total</u>
1	1.5 day lag for billing difference in CWC	\$ 3,336,000	\$ 3,206,000	\$ 867,000	\$ 3,384,000	\$ 10,793,000
2	Associated Rev Req	\$ 500,000	\$ 484,000	\$ 130,000	\$ 500,000	\$ 1,614,000

Avoided Capital Costs -- Material and Supply Inventories at March 31, 2014

	<u>Met-Ed</u>	<u>Penelec</u>	<u>Penn Power</u>	<u>West Penn</u>	<u>Total</u>
3 Total meters in inventory	\$ 423,493	\$ 493,802	\$ 85,054	\$ 602,254	\$ 1,604,603
4 Smart Meters in inventory	139	130	44	207	520
5 Legacy meters in inventory (Line 1 - Line 2)	\$ 423,354	\$ 493,672	\$ 85,010	\$ 602,047	\$ 1,604,083
6 Handheld devices in inventory	-	-	-	-	-
7 Total inventory (Line 3 + Line 4)	\$ 423,354	\$ 493,672	\$ 85,010	\$ 602,047	\$ 1,604,083
8 Revenue requirement	\$ 42,697	\$ 54,561	\$ 6,135	\$ 59,352	\$ 162,745

**Load Research
 Cost Baseline for Smart Meter Benefit
 For the Twelve Months Ending April 2016**

<u>Line No</u>	<u>Description</u>	<u>Met-Ed</u>	<u>Penelec</u>	<u>Penn Power</u>	<u>West Penn</u>	<u>Total</u>
1	Number of load research meters in field	196	284	14	238	732
2	Cost of load research meters	\$ 400	\$ 400	\$ 400	\$ 400	\$ 1,600
3	Cost of Normal meters	50	50	50	50	200
4	Net Cost of load research Meters (Line 2 - Line 3)	350	350	350	350	1,400
5	Capital Cost of load research Meters (line 1 X line 4)	68,600	99,400	4,900	83,300	256,200
6	Depreciation Reserve per meter	87	87	215	226	616
7	Accumulated Depreciation Reserve (Line 1 X Line 6)	<u>17,081</u>	<u>24,780</u>	<u>3,012</u>	<u>53,887</u>	<u>98,761</u>
8	Net load research Meters in Rate Base (Line 5 - Line 7)	\$ 51,519	\$ 74,620	\$ 1,888	\$ 29,413	\$ 157,439
9	Carrying Charge	<u>12.91%</u>	<u>12.93%</u>	<u>13.16%</u>	<u>12.76%</u>	
10	Revenue requirement for rate base (Line 8 X Line 9)	\$ 6,651	\$ 9,648	\$ 248	\$ 3,753	\$ 20,301
11	Depreciation Rate of meters	4.19%	4.30%	2.70%	2.10%	
12	Depreciation expense (Line 5 X Line 11)	<u>2,874</u>	<u>4,274</u>	<u>132</u>	<u>1,749</u>	<u>9,030</u>
13	Revenue requirement (Line 10 + Line 12)	\$ <u>9,525</u>	\$ <u>13,923</u>	\$ <u>381</u>	\$ <u>5,502</u>	\$ <u>29,331</u>

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Joint Petition of Metropolitan Edison :
Company, Pennsylvania Electric Company, : Docket M-2009-2123950
Pennsylvania Power Company and West Penn :
Power Company for Approval of Smart Meter :
Technology Procurement and Installation Plan :
:

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of Pennsylvania Electric Company's Supplemental filing to the Smart Meter Technologies Charge Rider Rates filing of August 1, 2014 upon the individuals listed below, in accordance with the requirements of 52 Pa. Code §1.54.

Service by First Class Mail, as follows:

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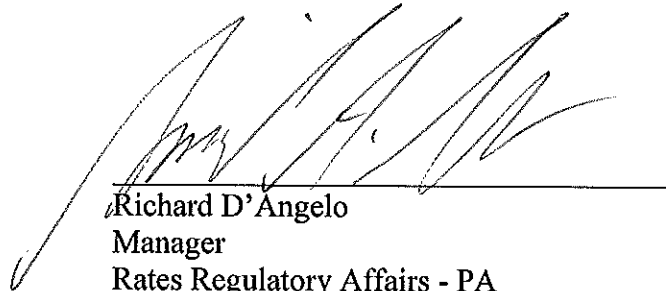
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August 15, 2014



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