

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Rulemaking Re Amending : Docket No. L-00030161
Reliability Regulations at :
52 Pa. Code Chapter 57 :

**COMMENTS OF PECO ENERGY COMPANY TO THE PROPOSED
RULEMAKING ORDER SETTING FORTH THE COMMISSION'S
PROPOSED GUIDELINES AND STANDARDS FOR ELECTRIC
SERVICE PERFORMANCE RELIABILITY**

Supplementary to the comments filed by the Energy Association of Pennsylvania ("Energy Association") on behalf of PECO Energy Company ("PECO Energy") and ten other investor-owned electric distribution companies ("EDCs"), PECO Energy files these comments in response to the Pennsylvania Public Utility Commission's ("Commission") Proposed Rulemaking Order on Electric Reliability published in the *Pennsylvania Bulletin* on October 4, 2003 ("Proposed Rulemaking").

I. Introduction

As with the Tentative Order,¹ PECO Energy appreciates the extensive effort made by the Commission and supports many of the suggested revisions and the findings discussed in the Proposed Rulemaking. However, to accurately reflect the Commission's intent as set forth in the discussion sections of the Proposed Rulemaking and Tentative Order, it is PECO Energy's position that certain portions of the regulations require further revision as set forth below.

¹ Tentative Order and Request For Comments on the Proposed Guidelines and Policies regarding Standards for Electric Service Performance Reliability issued by the Commission at its Public Meeting held on June 26, 2003 ("Tentative Order").