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October 9, 2003

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VIA UPS OVERNIGHT

James J. McNulty, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street, 2<sup>nd</sup> Floor  
Harrisburg, Pennsylvania 17120

Re: Amended Reliability Benchmarks and Standards for Electric  
Distribution Companies  
Docket No. M-00991220

Dear Secretary McNulty:

Enclosed herewith for filing on behalf of Metropolitan Edison Company, Pennsylvania Electric Company and Penn Power Company are an original and nine (9) copies of their Joint Comments in the above-referenced proceeding.

A copy of these Joint Comments is being served upon the Office of Consumer Advocate, the Energy Association of Pennsylvania, the Office of Small Business Advocate and counsel for the AFL/CIO.

We would appreciate if the Commission would advise of all parties that file Comments in this proceeding so we may avail ourselves of our right to file Reply Comments in accordance with the Commission's recently published notice.

Very truly yours,

RYAN, RUSSELL, OGDEN & SELTZER



Alan Michael Seltzer

Enclosures

AMS:jab

c: J. Michael Love  
Scott J. Rubin, Esquire, Attorney for AFL/CIO

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Amended Reliability Benchmarks :  
And Standards For Electric : Docket No. M-00991220  
Distribution Companies :  
:

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

**I. INTRODUCTION**

The Pennsylvania Public Utility Commission (“Commission”) entered a Tentative Order on June 27, 2003 at Docket No. M-00991220 (“Tentative Order”) seeking, among other things, “to tighten our standards for performance reliability in the electric distribution industry...” That order, which was published in Volume 33, No. 28 of the Pennsylvania Bulletin on July 12, 2003, invited all interested parties to file comments within 60 days of such publication. Metropolitan Edison Company (“Met-Ed”), Pennsylvania Electric Company (“Penelec”) and Pennsylvania Power Company (“Penn Power”)<sup>1</sup> are collectively submitting these Joint Comments in response to the Tentative Order.<sup>2</sup>

**II. RELATIONSHIP TO THE ENERGY ASSOCIATION OF  
PENNSYLVANIA’S COMMENTS**

The Companies are active members of the Energy Association of Pennsylvania (“EAP”), which is also submitting comments in connection with the

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<sup>1</sup> Met-Ed, Penelec and Penn Power are collectively referred to in these Joint Comments as the “Companies.”

<sup>2</sup> Met-Ed, Penelec and Penn Power are all Pennsylvania-based operating electric distribution companies of FirstEnergy Corp., their parent company.

Tentative Order. While the Companies have reviewed and endorse EAP's Comments, the Commission should place this support in proper context. As an organization charged with representing the often divergent views of its varied members, EAP's Comments are intentionally general and do not (indeed cannot) represent the unique perspectives of its individual members, like the Companies. Thus, while the Companies support the EAP Comments and urge the Commission to adopt them in determining the final regulations that may emerge from this proceeding, if there is any inconsistency with the more specific Comments presented by the Companies here, the latter should be viewed as the Companies' preferred position.

### **III. RESERVATION OF RIGHTS**

It is apparent from the language in the Tentative Order that it was originally intended to be entered and published simultaneously with a separate order at Docket No. L- 00030161 ("Rulemaking Order") proposing revisions to the Commission's existing regulations at 52 Pa. Code §§ 57.191-57.197 designed to ensure the continuing safety, adequacy and reliability of the generation, transmission and distribution of electricity in the Commonwealth. However, the Rulemaking Order has not yet been published in the Pennsylvania Bulletin. The Companies are aware of the Commission's request in the Tentative Order that parties proposing comments should do so "in conjunction with the Rulemaking Order." Tentative Order, ordering ¶ 2 at 21. Although the Companies have taken the Rulemaking Order into consideration in preparing these Joint Comments, they are not commenting on the detailed provisions of that as yet unpublished order. Therefore, the Companies reserve their rights to address new issues

and revise any positions taken in these Joint Comments whenever the Commission finally directs the publication of the Rulemaking Order.

The Companies also note that the EAP Comments point out some specific areas of inconsistency between the Tentative Order and the Rulemaking Order. These inconsistencies are in both the substance and tone of the orders, making it difficult for electric industry in general and the Companies in particular to ascertain the Commission's true intent. Accordingly, the Commission is urged to consider, address and resolve these differences *before* publishing the final Rulemaking Order in the Pennsylvania Bulletin for public comment.

#### **IV. CONCEPTUAL AGREEMENT WITH THE TENTATIVE ORDER**

The need for continued reliability of the electric distribution systems in Pennsylvania and the nation is hardly arguable. A strong, stable and reliable energy delivery system, capable of handling new and emerging conditions, is in the public interest and is a laudable goal. However, the real question – raised clearly by the Tentative Order – is how does Pennsylvania achieve this goal?

As a broad conceptual matter and over the long-term, the Companies agree with and support the Commission's efforts to:

- Establish tighter reliability standards regarding the number and duration of power outages;
- Utilize the following three primary performance indices as evidence of a utility's reliability performance: (i) SAIFI – average number of interruptions/customer; (ii) CAIDI – average amount of time a utility takes to restore service; and (iii) SAIDI – average outage time per customer;

- Eliminate the current two standard deviation approach for determining reliability performance; and
- Employ a 2-tier performance methodology allowing a 10% deviation for a rolling three-year period a 20% deviation during a rolling twelve-month period;
- Engage in additional review and analysis of those utilities that fail to meet the established reliability standards;
- Standardize among the electric distribution companies the outage data maintained and submitted to the Commission; and
- Adopt a “company-wide” reporting standard for outage data to avoid fragmented approaches to data collection and reporting to the Commission.

However, a general consensus on some of the “basics” is not enough to develop a fair and balanced methodology for assessing a utility’s performance and commitment to distribution system reliability. An acceptable approach must also:

- Give explicit recognition to the unique circumstances impacting reliability with respect to each jurisdictional electric distribution company;
- Acknowledge utility efforts to improve reliability data collection subsequent to electric de-regulation;
- Acknowledge and address the differences in the quality and nature of outage data for some utilities pre and post de-regulation;
- Establish realistic performance benchmarks that are based on accurate outage data;
- Allow for some transition period for compliance with new reliability benchmarks that are established based upon outage data that did not exist during prior periods;

- Avoid unduly burdening utilities with reporting and filing requirements that will divert human and capital resources from the business of ensuring reliability with marginal incremental benefits for the Commission; and
- Clarify why, when and how the Commission will levy fines and/or penalties for violations of the performance reliability standards.

The Tentative Order raises a number of issues and possible concerns about how the Commission proposes to ultimately issue and implement electric distribution performance and reliability standards. Those concerns are exacerbated because the Commission has not yet directed the publication of the Rulemaking Order in the Pennsylvania Bulletin for public comment. The balance of these Joint Comments provides greater detail about the Companies' concerns and how the Commission should address them.

## **V. DATA COLLECTION AND QUALITY**

The cornerstone of tracking reliability performance is the amount and quality of data available during any specific period addressing the type, nature and duration of customer outages. Needless to say, the way in which reliability information has been and is now being gathered and accumulated for the Companies will have a profound impact on anyone's ability to objectively assess their overall system reliability.

With the exception of Allegheny Power Company, Met-Ed and Penelec are in the unique position of having installed and implemented a new automated process for collecting outage information after the 1994-1998 base period used by the Commission in determining reliability benchmarks and standards. Met-Ed and Penelec specifically incurred the capital and operating costs for the new outage management

system for the express purpose of improving service reliability. Although Penn Power installed its outage management system in 1994, it has other data collection issues that must be expressly addressed in any discussion about establishing benchmarks for electric distribution reliability.

It is not clear whether the Commission in the Tentative Order or in any subsequent rulemaking intends to give explicit recognition to (i) Met-Ed's and Penelec's unique circumstances resulting from their proactive efforts to measure and improve reliability through the installation of the new data collection and outage management system ("OMS") and (ii) Penn Power's prior issues with reliability data that significantly impact the existing benchmarks derived from its mid-1990's outage information. Conversely, what is clear is that Appendix B of the Tentative Order (i) recalculates the Met-Ed and Penelec's benchmarks *without* any consideration of the improvement in their collection of reliability data since electric restructuring, (ii) recalculates Penn Power's benchmarks *without* any consideration of the inaccuracy of some of its base period reliability data and, as a result, (iii) is an erroneous basis on which to assess the Companies' pre and post electric restructuring reliability.

The impact of Met-Ed's and Penelec's new OMS and its potential to adversely effect comparative information during the 1994-1998 base period is not new to the Commission. In their 2002 Annual Reliability Report to the Commission, Met-Ed and Penelec provided the details of their new outage management system and the possible adverse impacts it could have on developing accurate reliability benchmarks:

As stated in previous reports, statistics for several operating areas are elevated relative to historic performance. Met-Ed and Penelec believe that the new automated system and the process for collecting outage information have resulted in higher reported statistics for reliability than

with previous manual data collection processes with no real change in reliability. According to the vendor, this elevation in statistics is typically experienced by companies that have installed an OMS [Outage Management System]. This difference is more pronounced in Penelec's operating area statistics, as Penelec formerly had little automation associated with the old data collection methodology, whereas Met-Ed was relatively automated.

The new OMS system collects, accumulates, and analyzes reliability data in greater amounts and is designed to provide better precision than was available previously to Met-Ed and Penelec. Since the reliability benchmarks and performance standards used by the PaPUC were established with input data not gathered by today's more sophisticated means, it is possible that those data points may not truly be representative of either current or historic reliability. It may be necessary at some point to reassess the PaPUC established performance standards and benchmarks in light of the currently advanced state of data gathering and analysis now permitted by the OMS.

(Emphasis added).

The Commission's discussion on pages 14-16 of the Tentative Order seems to acknowledge the fundamental principles regarding reliability data and quality, but then falls short of implementing prophylactic measures designed to address the unique circumstances confronting those utilities – like Met-Ed and Penelec -- whose new outage data makes it appear that their reliability is worse than it is in actuality.

Indeed, after acknowledging in some detail the nature of the problem, the Commission seems to take solace in the fact that the data quality issue will somehow resolve itself in the near future:

While the data quality issue pertaining to method variance is problematic in the interim, fortunately it is a problem that will resolve itself in the near future. The Commission proposes to move forward with setting new standards at this time and revisit the potential for setting new benchmarks and standards a few years in the future when we have several years of consistent data collection under the improved reliability monitoring systems being implemented and refined today.

Tentative Order at 15-16.

Having seemingly understood the problem and recognized that it may ultimately become a non-issue, the Tentative Order concludes the data quality section with a strong admonition that “repeated violations of the two-tiered standard shall result in enforcement actions including fines and other available remedies.” Tentative Order at 16. A final departing comment suggests that the Commission intends to impose fines and other penalties for violations of its new two-tiered performance system even though its new recalculated benchmarks cannot and will not be met because of the availability of improved data.

Penn Power’s reliability data issues relate to that company’s transition to an automated mapping structure in the mid-1990’s. Early in the 1990’s, Penn Power relied heavily upon its Dispatch or the Line Section offices to estimate the number of customers affected by power outages. However, during the early conversion from paper maps to an electronic mapping system it was determined that as much as 40% of Penn Power’s customers were not properly identified as being connected to the correct protective device and/or circuit. This situation adversely impacted the accuracy of outage data. Since the mid-1990’s, the accuracy of customer and circuit connectivity has improved significantly at Penn Power, resulting in substantially more accurate outage statistics. Because of this data quality issue in the early implementation of its automated outage system, Penn Power’s revised benchmarks and standards must be established with a full understanding that some of the data used in the base years was not accurate or reflective of actual service outages and interruptions.

It is neither appropriate nor acceptable for the Commission to establish a new regulatory scheme that may place the Companies at immediate risk of

noncompliance and possible sanctions. This is particularly true when the Companies' apparent issues with reliability performance are not real, but merely the result of improved data collection and reporting (Met-Ed and Penelec), and/or inaccurate data during the transition to a more automated method for collecting and reporting information on outages (Penn Power). It makes no sense to establish a new framework for addressing reliability knowing that certain utilities – like the Companies -- will be largely out of compliance (based upon existing data) at the outset. It is also not clear under the Tentative Order whether the Companies' lack of compliance with the recalculated benchmarks and standards will immediately result in Commission enforcement before the data collection issue has “resolved itself”.

The Companies' unique concerns about data collection and quality -- and their ultimate impact on the Commission's reliability standards – must be thoroughly addressed and resolved *before* the Commission issues final regulations. To the extent all of the Companies' concerns are not reflected in the establishment of reasonable reliability benchmarks (to be discussed in Section VI below), this Commission needs to clearly establish a specific transition period to allow affected distribution companies time to work their way into compliance with any new standards *before* incurring any penalties or violations for alleged unreliable service. Given the unique circumstances affecting the Companies, the Commission should not impose any sanctions for noncompliance with reliability standards based upon more accurate outage reporting statistics without affording the affected utility all of its normal due process rights and protections.

## **VI. THE NEED FOR REVISED BENCHMARKS AND STANDARDS**

The recomputed benchmarks and standards specified for the Companies in Appendix A of the Tentative Order are incorrect. The Companies feel strongly that the Commission's proposed benchmarks and standards must be recomputed in order to reflect an accurate basis for determining their overall reliability. While data from the 1994-1998 period may be appropriate to establish benchmarks for some utilities that have not implemented new outage management data collection systems or that do not have other unique issues affecting the quality of prior reliability data, for the reasons specified above, it is not appropriate for the Companies. Indeed, the June 2002 Legislative Budget and Finance Committee report entitled "Assessing the Reliability of Pennsylvania's Electric Transmission and Distribution Systems" ("LBFC Report"), specifically recognized the inappropriateness of using historic reliability data to establish new benchmarks when such data has not been collected in a uniform manner:

Once data are no longer gathered and collected in the same way, they can no longer be used for purposes of historic comparisons and trend analysis without certain information to account for data gathering differences.

(LBFC Report at 47)

The LBFC Report addresses the exact situation confronting the Companies. The installation of the new outage management data collection systems by Met-Ed and Penelec, and the unique issues affecting the quality of some of Penn Power's prior reliability data make it impossible to simply use the old reliability data to fashion new benchmarks and standards. Some adjustment is necessary to create an accurate basis upon which to evaluate the Companies' current and prospective reliability performance.

Utilizing the recomputed benchmarks and standards specified in Appendix A of the Tentative Order will create immediate compliance issues for the Companies and, absent a formal transition period for compliance or a compliance waiver, potential for Commission sanctions. This is inequitable since the Companies will not have sufficient time to implement the necessary measures to improve reliability to the level of the recomputed benchmarks. The recomputed benchmarks and standards proposed by the Commission do not adequately address the unique factors impacting the Companies. In contrast, the Companies' proposed benchmarks and standards address their special circumstances while satisfying the goal of the Electricity Generation Customer Choice and Competition Act, 66 Pa. C. S. § 2802(12), to "ensure the reliability of the interconnected electric system by maintaining the efficiency of the transmission and distribution system."

In order to correct the erroneous benchmarks and standards specified in Appendix A of the Tentative Order, the Companies have attached to these Joint Comments as Exhibit 1 a list of their proposed recomputed benchmarks and standards based upon reporting years which are substantially more accurate and permit a more realistic assessment of their current reliability performance.

The Companies' revised standards and benchmarks are based upon reliability indices (i.e., SAIFI, CAIDI and SAIDI) for years 1998-2002 in order to avoid the less than completely accurate reliability data from the mid-1990's described above.

The Companies request that the Commission utilize these revised benchmarks and standards because they provide a far more realistic basis on which to

evaluate the Companies' short and long term reliability than the Commission's proposed benchmarks.

**VII THE COMMISSION'S APPROACH TO LONG-TERM TRENDING IS UNACCEPTABLE AND INAPPROPRIATE**

The Commission's proposed approach to reliability performance standards based upon a thirty-six (36) month and twelve (12) month rolling averages for the CAIDI, SAIFI and SAIDI indices anticipate a bandwidth of acceptable and reliable performance. If a utility falls within the acceptable bandwidth of the new performance standards, it is in compliance with these objectively determined quantitative standards.

However, on page 13 of the Tentative Order, the Commission interjects what is tantamount to a "new standard":

Alternately, the Commission will not view performance that consistently falls within the bandwidth between the benchmark and the standards, but does [not]<sup>3</sup> trend toward the benchmark, as acceptable.

Tentative Order at 13.

Based upon these words, the real standard is a "trend" toward the benchmark, not merely falling within the bounds of the applicable benchmarks and standards. However, the Commission provides no further information about how it will view utilities that are not trending in the right direction or what period of performance will be viewed as a "trend". There is no discussion in the Tentative Order about how the Commission will determine when a utility "consistently falls within the bandwidth but does not trend toward the benchmark". This hidden standard would in theory allow the Commission to impose sanctions upon a utility that is not trending in the right direction

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<sup>3</sup> Although the word "not" is missing from this sentence, it is apparent from the Commission's discussion earlier in the Tentative Order that this word was clearly intended.

(in either the amount or timing) without any prior notice to the affected utility or any ability to address the specific concern giving rise to the sanction. This is an unacceptable and potentially unlawful result.

So long as the recomputed benchmarks are accurate and realistic and utilities are providing service within the relevant bandwidth, they are – and should be found to be -- providing reliable service. It is far better to reconsider and evaluate the standards and benchmarks prospectively – with notice and an opportunity for all parties to comment - than to impose an additional subjective and potentially arbitrary standard as currently proposed with no advance notice.

#### **VIII. EXCESSIVE REPORTING REQUIREMENTS SHOULD BE MINIMIZED**

Although not directly addressed in the Tentative Order, the Companies believe that the issue of the timing and nature of reporting is so critical that the Commission should be aware of the Companies' views on this issue now, rather than awaiting the publication of the Rulemaking Order.

The Companies do not support the submission of quarterly reliability reports to the Commission, at least with the financial and cost information presently suggested. Although the Companies review distribution circuit performance monthly, it will take a significant amount of resources to compare and assemble the type and nature of information the Commission appears to desire as part of its quarterly reporting.

In addition, the Companies do not believe it is necessary or appropriate for the Commission to receive information about their transmission and distribution inspection and maintenance goals, budgeted operation and maintenance expenses, budgeted capital expenditures, budgeted transmission and distribution contractor hours,

and comparisons of budgeted versus actual expenditures for all categories. To assemble this amount of data would be costly and time-consuming, with little if any direct relationship to the causes or remediation of reliability problems.

The Companies are also concerned that the submission of such detailed financial and cost information will put the Commission in a position to second-guess and challenge the Companies' day-to-day management decisions about matters that have at best an indirect relationship to distribution reliability. The Companies – not the Commission – are in the best position to determine how they will seek to improve reliability. The time and expense that would be incurred to gather and report this information is significant compared to the very marginal benefits to the Commission of having such information.

The Commission should make every effort to use the Tentative Order and the Rulemaking Order to clarify the *full scope* of required reliability reporting for its jurisdictional electric distribution companies. Over the last several years, the Commission has asked for numerous reliability-related reports – containing a variety of information to be filed at different times – from the utilities. These reports are being provided to the Commission in support of management investigations, specific Commission decisions in litigated proceedings and pursuant to existing Commission regulations. The Commission needs to clarify in this current process which reports currently being submitted will be eliminated by the reporting requirements that emerge from this proceeding and/or from any regulations that may result from the proceeding on the Rulemaking Order.

Thus, while the Companies support efforts to provide timely annual reporting of information pertinent to distribution reliability, they do not believe it is

necessary or desirable to submit quarterly information with the level of detail and information currently being suggested by the Commission or continue with existing reliability-related reports that needlessly duplicate the reporting that may emerge from this proceeding and the one involving the Rulemaking Order. If quarterly reporting is found to be necessary or desirable, the Companies suggest it be limited to an update of the CAIDI, SAIFI and SAIDI indices for the current quarter.

**IX. REQUEST FOR EXCLUSION OF SERVICE INTERRUPTIONS FOR MAJOR EVENTS**

On pages 17-20 of the Tentative Order, the Commission identifies a formal process for utilities to obtain an exclusion of service interruptions for reporting purposes. Under the Commission's proposed process, a utility will need to supply responses to seven (7) specific questions in support of a formal request to exclude a particular service interruption as a major event, and the Commission will need to review and grant permission to exclude the outage from a utility's reliability calculations.

The Companies recognize that there has been some inconsistency in the way utilities historically have treated "major events" which, under current Commission regulations, could be excluded from their general reliability calculations. However, the new definition of operating area will make this process more consistent and it is, therefore, unnecessary to establish a formal process to exclude certain major events from a utility's outage data. Such a process would be costly and time consuming for all parties involved.

Rather than implementing such a formal process, the Companies suggest that the Commission simply review each utility's annual reports to determine if there has

been any abuse or misunderstanding regarding any claims for major events, and direct any necessary and appropriate adjustments based upon the after-the-fact evaluation.

So long as there is a clear understanding about (i) the definition of a “major event” and (ii) when such an event can be excluded from a utility’s normal outage data, there should be no problem with the Commission’s review of the annual reliability reports on an after-the-fact basis.

## **X. CUSTOMERS’ PERCEPTION OF RELIABILITY**

Although much of the Commission’s focus on reliability is from the quantitative perspective of reliability indices, benchmarks and standards, in the end reliability is really all about what customers think and how they respond to two simple questions: (i) Is your electric service reliable today? and (ii) Is your electric service more or less reliable today than it was in the past?

The point is that in the midst of all the debate about the quantitative and objective determinants of reliability, the Companies believe that the Commission would be well advised to consider and reflect in its reliability performance standards what customers think about their electric distribution service.

FE’s commitment to service reliability is reflected in the Commission’s 2002 Customer Service Performance Report (“Performance Report”), issued by the Bureau of Consumer Services (“BCS”). For example, the BCS found or documented that the Companies’ customers:

- Viewed their overall quality of service in 2002 to be among the highest of the electric distribution companies (“EDCs”) in the Commonwealth (Appendix A, Table 1B);

- Were more satisfied in 2002 with the Companies' representatives handling customer contacts than any other EDCs in the Commonwealth (Appendix A, Table 1B, and page 29);
- Rated the Companies' Call Center representatives in 2002 more knowledgeable than any other representatives of EDCs in the Commonwealth (page 31);
- Rated the Companies among the highest in the Commonwealth in 2002 for the satisfaction with the ease in contacting/reaching the company. (Appendix A, Table 1 A, and page 25); and
- Rated the Companies' Call Center representatives in 2002 more courteous than any other representatives of EDCs in the Commonwealth (page 41).

The positive perception of the Companies' reliability reflected in the Performance Report is the result of several new and improved practices instituted by FE since it assumed management of Met-Ed and Penelec in November 2001. FE has made a significant commitment to vegetation management by, among other things, reducing its tree trimming cycle to four years. FE has also expedited the Companies' access to trained professional crews from Ohio and New Jersey to assist in outage restoration activities. FE has created a second shift, one-person line crew. This approach, which has been used successfully in Ohio, provides the dual benefit of reduced cost and enhanced quality of service. FE's proven storm procedures have translated into demonstrative reliability benefits for the Companies, including: (i) a significantly larger pool of spare parts and inventory of critical items such as transformers, (ii) expanded call center and dispatch support to more quickly match up customers with outages and those to assist them and (iii) renewed and expanded emphasis on safety.

The Performance Report clearly demonstrates that the Companies are continuing to provide reliable electric service as viewed by their customers. And it is customers who are the ultimate authority on electric distribution reliability.

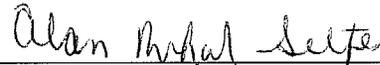
## **XI. CONCLUSION**

The Companies welcome the Commission's efforts to tighten its reliability standards for the benefit of consumers, the Commission, and electric distribution companies. However, this process needs to address the unique situation applicable to certain electric distribution companies in Pennsylvania and to reflect a realistic development of benchmarks and standards so that reliability can be properly assessed.

The concerns addressed by the Companies in these Joint Comments must be addressed in order to have effective and long-term regulation of reliability in Pennsylvania.

Respectfully submitted,

Dated: October 9, 2003



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Proposed Benchmarks & Standards									
Company	Reliability Indices	Benchmarks				Standards			
		PaPUC Current Benchmark	PaPUC Recomputed Benchmark	Companies' Proposed Benchmark	PaPUC Proposed 12-Month Rolling (120%)	Companies' Proposed 12-Month Rolling (120%)	PaPUC Proposed 3-Year Rolling (110%)	Companies' Proposed 3-Year Rolling (110%)	
Met-Ed	SAIFI	0.97	1.06	1.17	1.27	1.41	1.17	1.29	
	CAIDI	117	127	156	152	187	140	171	
	SAIDI	113	135	179	194	215	163	197	
Penelec	SAIFI	1.07	1.15	1.39	1.38	1.66	1.27	1.52	
	CAIDI	104	115	143	138	172	127	158	
	SAIDI	108	132	204	190	245	160	225	
Penn Power	SAIFI	1.01	1.02	1.35	1.22	1.62	1.12	1.49	
	CAIDI	93	92	118	110	141	101	129	
	SAIDI	95	94	157	135	189	114	173	

Note: Penn Power, Met-Ed and Penelec proposed benchmarks are calculated using reliability indices from years 1998 - 2002.