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April 21, 2011

**VIA OVERNIGHT FEDERAL EXPRESS**

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

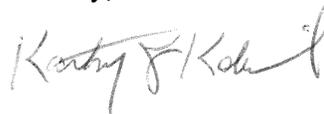
**Re: *Comments of Metropolitan Edison Company, Pennsylvania Electric Company, Pennsylvania Power Company and West Penn Power Company to the Tentative Order Proposing Expedited Process for Approval of Minor Changes to EDC Act 129 EE&C Plans***  
***Docket No. M-2008-2069887***

Dear Secretary Chiavetta:

Enclosed are an original and eleven (11) copies of the Comments of Metropolitan Edison Company, Pennsylvania Electric Company, Pennsylvania Power Company and West Penn Power Company to the Tentative Order Proposing Expedited Process for Approval of Minor Changes to EDC Act 129 EE&C Plans.

Please date stamp the additional copy of the Comments and return it to me in the enclosed, postage-prepaid envelope. Should you have any questions regarding this matter, please do not hesitate to contact me.

Sincerely,



Kathy J. Kolich

Enclosure

c: Kriss E. Brown, Law Bureau  
Johnnie E. Simms, Office of Trial Staff  
William R. Lloyd, Office of Small Business Advocate  
Irwin A. Popowsky, Office of Consumer Advocate

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Re: Energy Efficiency and Conservation Program :  
: Docket No. M-2008-2069887

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

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Metropolitan Edison Company, Pennsylvania Electric Company, Pennsylvania Power Company and West Penn Power Company (collectively, “the Companies”) appreciate the opportunity to comment on the Commission’s Tentative Order Proposing Expedited Process for Approval of Minor Changes to Electric Distribution Utility (“EDU”) Act 129 Energy Efficiency & Conservation (“EE&C”) Plans (“Tentative Order”). The Companies commend the Commission for recognizing the need for an expedited process for minor EE&C Plan changes. In addition to the Companies’ brief comments below, as member EDCs of the Energy Association of Pennsylvania (“EAP”), the Companies support and specifically incorporate by reference the EAP’s comments to the Tentative Order that will also be filed by the EAP today. Because the EAP’s comments are fairly inclusive, the Companies’ comments will be brief, focusing on two minor suggested changes.

First, the Tentative Order requires that the EDCs file with the Commission and serve on the Office of Consumer Advocate (“OCA”), Office of Small Business Advocate (“OSBA”) and Office of Trial Staff (“OTS”) and all parties of record the proposed revised EE&C plan identifying the minor changes. Because the EE&C plans for each

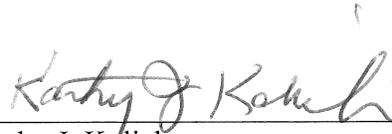
EDC are voluminous (generally more than 100 pages), it is incredibly time-consuming and costly to serve and file a complete proposed revised plan. Thus, the Companies propose that the Commission not require the EDCs to supply an entire revised plan for minor changes. Rather, the Companies suggest that the EDCs simply file documentation (which may include various pages from the approved plan) sufficient to support the change, which would also explain how the changes affect the current plan as approved. Because it is anticipated that the changes through this process will be minor, this suggested revision to the Tentative Order will eliminate unnecessary paperwork, reduce compliance costs and make the process more efficient.

Second, the Tentative Order indicates that the Commission is delegating its authority to approve “minor EE&C Plan changes, as defined below, to staff of the Bureau of Conservation, Economics and Energy Planning, with assistance from staff of the Bureau of Fixed Utility Services and the Law Bureau.” (Tentative Order at p. 4.) Because it is possible that these divisions could change names or be reorganized in the future, the Companies suggest that that the language “or their successor division(s) as determined by the Commission” be added to this provision. This suggested revision will eliminate any future confusion should these divisions or the Commission’s structure change.

In conclusion, the Companies respectfully request that the Commission adopt these two comments along with the comments proffered by the EAP and revise the Tentative Order accordingly.

Respectfully submitted,

Dated: April 21, 2011



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West Penn Power Company

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Re: Energy Efficiency and Conservation Program :  
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**CERTIFICATE OF SERVICE**

I hereby certify that I have this day served a true and correct copy of the foregoing document upon the individuals listed below, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

Service via overnight delivery, as follows:

Rosemary Chiavetta, Secretary  
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Dated: April 21, 2011

  
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