

610-929-3601

Linda R. Evers, Esq.
(610) 921-6658
(610) 939-8655 (Fax)

November 7, 2008

VIA OVERNIGHT UNITED PARCEL SERVICE

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

**Re: *Rulemaking Re: Revision of 52 Pa. Code Chapter 57 Pertaining
to Adding Neutral Connection Inspection and Maintenance
Standards for the Electric Distribution Companies***

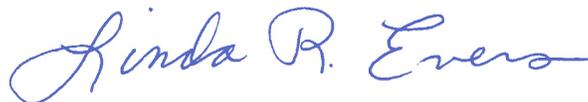
Dear Secretary McNulty:

Enclosed for filing are an original and sixteen (16) copies of Reply Comments of Metropolitan Edison Company, Pennsylvania Electric Company and Pennsylvania Power Company (collectively, "FirstEnergy") in the above-referenced docket. Please date stamp the additional copy and return it to me in the enclosed, postage-prepaid envelope.

As indicated on the Certificate of Service, copies have been served on the parties in the manner indicated.

Please contact me at the above phone number should you have any questions.

Sincerely,



Linda R. Evers, Esquire

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Enclosures

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Rulemaking Re: Revision of 52 Pa. Code :
Chapter 57 Pertaining to Adding Neutral :
Connection Inspection and Maintenance : **Docket No. L-2008-2044821**
Standards for the Electric Distribution :
Companies

**REPLY COMMENTS ON BEHALF OF METROPOLITAN EDISON
COMPANY, PENNSYLVANIA ELECTRIC COMPANY AND
PENNSYLVANIA POWER COMPANY**

TO THE PENNSYLVANIA PUBLIC UTILITY COMMISSION:

I. REPLY COMMENTS

Metropolitan Edison Company (“Met-Ed”), Pennsylvania Electric Company (“Penelec”) and Pennsylvania Power Company (“Penn Power”), collectively referred to as “FirstEnergy” or the “Companies”, submit these reply comments to the above-captioned docket in response to the Office of Consumer Advocate’s (“OCA”) comments regarding the Pennsylvania Public Utility Commission’s (“Commission”) Advance Notice of Proposed Rulemaking Order on the proposed establishment of inspection, maintenance, repair and replacement standards regarding neutral connections under 52 Pa. Code Chapter 57.

As stated in their comments, the OCA believes the electric distribution companies’ (“EDCs”) responses to this rulemaking should determine the extent of Commission action regarding this issue. FirstEnergy believes their comments as well as those of the Energy Association of Pennsylvania and the other EDCs within this Commonwealth have provided the Commission with sufficient information to conclude that inspection and maintenance standards

regarding neutral connections are unnecessary, cost prohibitive and of minimal or no value. As a result, FirstEnergy urges the Commission to not adopt standards regarding the inspection and maintenance of neutral connections.

The Companies disagree with the OCA's position regarding the implementation of automatic civil penalties. The Commission should always retain the discretion to address the compliance issues of EDCs on a case-by-case basis. As with other reliability-related areas, this Commission has always investigated the specific circumstances regarding noncompliance. These due process safeguards should not be abandoned should the Commission implement standards regarding neutral connections. In fact, when considering that most neutral connection failures are not preventable via inspections, penalties and fines regarding neutral connections appear arbitrary and unrelated to the Commission's goal of improved reliability.

II. CONCLUSION

The Companies thank the Commission for the opportunity to provide reply comments regarding this Advance Notice of Proposed Rulemaking pertaining to the proposed establishment of inspection and maintenance standards regarding neutral connections to Pa. Code 52 Chapter 57.

Respectfully submitted,

Dated: November 7, 2008

A handwritten signature in blue ink that reads "Linda R. Evers". The signature is written in a cursive style and is positioned above a horizontal line.

Linda R. Evers

Attorney No. 81428

Attorney for:

Metropolitan Edison Company,

Pennsylvania Electric Company and

Pennsylvania Power Company

2800 Pottsville Pike

P.O. Box 16001

Reading, PA 19612-6001

(610) 921-6658

levers@firstenergycorp.com

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Rulemaking Re: Revision of 52 Pa. Code :
Chapter 57 Pertaining to Adding Neutral :
Connection Inspection and Maintenance : **Docket No. L-2008-2044821**
Standards for the Electric Distribution :
Companies :

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 by overnight United Parcel Service, as follows:

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

Aron J. Beatty
Assistant Consumer Advocate
Office of Consumer Advocate
555 Walnut Street, 5th Floor, Forum Place
Harrisburg, PA 17101-1923

Service via electronic mail, as follows:

ebarnes@state.pa.us

Dated: November 7, 2008



Linda R. Evers
Attorney No. 81428
Attorney for:
Metropolitan Edison Company
Pennsylvania Electric Company
Pennsylvania Power Company
2800 Pottsville Pike
P.O. Box 16001
Reading, PA 19612-6001
(610) 921-6658
levers@firstenergycorp.com