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April 20, 2009

VIA OVERNIGHT UNITED PARCEL SERVICE

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APR 20 2009

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

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

*Re: Rulemaking to Amend the Provisions of 52 Pa. Code, Chapter 56 to
Comply with the Provisions of 66 Pa. C.S., Chapter 14; General Review
of Regulations
Docket No. L-00060182*

Dear Secretary McNulty:

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

As directed, also enclosed is a diskette containing a copy of the Comments in electronic format.

Please contact me with any questions regarding this matter.

Sincerely,

Linda R. Evers, Esquire

dlm
Enclosures

c: As Per Certificate of Service

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**Rulemaking to Amend the Provisions of 52 :
Pa. Code, Chapter 56 to Comply with the Docket No. L-00060182
Provisions of 66 Pa. C.S., Chapter 14; :
General Review of Regulations :

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

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Dated: April 20, 2009

**Counsel for:
Metropolitan Edison Company,
Pennsylvania Electric Company and
Pennsylvania Power Company**

I. INTRODUCTION

On November 30, 2004, the Governor signed into law Senate Bill 677, or Act 201 of 2004, the Responsible Utility Customer Protection Act (the “Act”). The Act became effective on December 14, 2004, and added Chapter 14 to the Public Utility Code. 66 Pa. C.S. §§ 1401-1418 (“Chapter 14”). This law is intended to protect timely paying customers against rate increases resulting from other customers’ delinquencies, and to eliminate opportunities for customers capable of paying from avoiding the timely payment of their utility bills. 66 Pa. C.S. § 1402(2). Section 6 of the Act requires the Public Utility Commission (“Commission”) to amend 52 Pa. Code §§ 56.1- 56.231, Standards and Billing Practices for Residential Utility Service (“Chapter 56”), to comply with the provisions of Chapter 14, and to promulgate other necessary regulations to administer and enforce the Act.

On December 4, 2006, the Commission issued an Advance Notice of Proposed Rulemaking Order (“ANOPR”) to gather input from interested parties before drafting revised rules and regulations addressing the issues associated with Chapter 14. *Rulemaking to Amend the Provisions of 52 Pa. Code Chapter 56 to Comply with the Provisions of 66 Pa. C.S. Chapter 14 General Review of Regulations*, Docket No. L-00060182 (Advance Notice of Proposed Rulemaking Order issued December 4, 2006). Metropolitan Edison Company, Pennsylvania Electric Company and Pennsylvania Power Company (collectively, “the FirstEnergy Companies” or “the Companies”) submitted Comments to this ANOPR on February 14, 2007.

On September 25, 2008, the Commission adopted a Proposed Rulemaking Order to promulgate proposed regulations to implement Chapter 14. *Rulemaking to Amend the Provisions of 52 Pa. Code, Chapter 56 to Comply with the Provisions of 66 Pa. C.S., Chapter 14; General*

Review of Regulations, Docket No. L-00060182 (Proposed Rulemaking Order entered September 26, 2008). In addition to proposing regulations to implement Chapter 14, the Commission is also taking this opportunity to review and propose revisions to Chapter 56. The proposed rulemaking appeared in the *Pennsylvania Bulletin* on February 14, 2009, and invited interested parties to submit comments by April 20, 2009. 39 Pa.B. 925.

The FirstEnergy Companies respectfully submit the following comments in the above-captioned docket in response to the Commission's invitation for comments regarding the proposed rulemaking. The Companies wish to point out that its comments will primarily focus on Subchapters A through K of the proposed regulations since Subchapters L through V only apply to and impact the Companies in their dealings with individuals who are victims under a protection from abuse order. To the extent the Companies' comments that address sections in Subchapters A through K also generally impact similar sections in Subchapters L through V, the Companies request that those comments be applied to those similar sections as well.

II. COMMENTS

Following are the comments of the FirstEnergy Companies addressing specific sections of the proposed rulemaking as set forth in Annex A of the Order and Proposed Rulemaking published in the *Pennsylvania Bulletin* on February 14, 2009. Inasmuch as the FirstEnergy Companies do not have comments on every section of the proposed rulemaking, the comments herein will only address those sections of the proposed rulemaking where the Companies wish to offer specific comments and suggestions for the Commission's consideration.

1. § 56.2 Definitions

The FirstEnergy Companies believe that any definitions in Section 56.2 that are also found in Chapter 14 should mirror the exact definitions as provided for in the Act. However, to the extent the Commission chooses to alter such definitions as it has done in the proposed rulemaking, the FirstEnergy Companies would recommend the following:

- The definitions of “Applicant” and “Customer” should include clarity that these individuals must also be “eighteen years of age or older”; and
- The definition of “Household Income” should not include the second part listed under (ii) which provides the following exclusion to Household Income: “The term does not include income intended for the use of a minor. Examples of a minor’s income include Social Security, child support, SSI, earnings and grants from the Department of Public Welfare.” Social Security, child support, and SSI should not be excluded when determining a household’s income. This income, while it may be intended for the use of a minor, is issued directly to an adult parent or guardian to provide general support for a child, including basic needs such as shelter and electricity. It is also reported for tax purposes. Additionally, excluding any income intended for the use of a minor would result in removing a percentage of an adult’s income based on the number of minor household members and would have a significant impact on the number of customers qualifying for assistance, including customer assistance programs. Finally, if the income is not to be counted to determine

household income, then the individual should also not be counted to determine household size.

The FirstEnergy Companies also recommend that an additional exception to the definition of “Billing Month” be added to allow for instances that may follow a company’s rerouting of meter reading processes. The Companies are always exploring ways to improve processes and become more efficient. In recent years, rerouting meter reading processes has been an area where slight changes have resulted in significant efficiencies and savings. Over the past several years, the FirstEnergy Companies have filed several petitions to waive the regulation at 52 Pa. Code §56.2 and the definition of “billing month.” Due to a meter read rerouting, a customer may receive one bill that would be outside the definition of “billing month” immediately subsequent to the completion of the rerouting. An express provision that would allow for a bill of less than 26 days or more than 35 days specifically resulting from meter read rerouting would eliminate the need for companies to submit Petitions to waive the current definition of “Billing Month” and result in the savings of time and resources of both companies and the Commission.

In addition, the FirstEnergy Companies suggest that the term “electric distribution utility” should be replaced with “electric distribution company,” and the definition should be the same as that set forth at 66 Pa. C.S. 2803 (Definitions). The term, “electric distribution company” was introduced upon the enactment of the Electricity Generation Customer Choice and Competition Act, 66 Pa. C.S. 2801 *et seq.*, and the restructuring of the electric utility industry. Making this minor change should help to avoid any potential confusion associated with the term, “electric distribution company”, provided for in the

Public Utility Code that has the same meaning as a similar, but not exact term, “electric distribution utility”, being proposed in the Commission’s regulations.

Finally, the FirstEnergy Companies do not clearly understand the rationale or purpose for the new term, “Informal Dispute Settlement Agreements”, included in the Definitions and the proposed rulemaking. Its intended use is unclear, and the Companies are not sure how this term relates to a “Payment Agreement” and the number of payment agreements allowed under Chapter 14. This new term appears to introduce a third level of dispute. Additional clarification and more detailed information would be helpful to understand the intent of this new concept which, on its face, does not appear to further the implementation of either the letter or spirit of Chapter 14.

2. § 56.11 Billing Frequency

The FirstEnergy Companies support the inclusion of regulations regarding electronic billing and agree that this option should be voluntary and at the customer’s option. Section 56.11(b)(1) appears to provide the customer with the option of receiving both an electronic bill and a paper bill, if desired, at the same time. The Companies recommend that this language be clarified to make it clear that a customer must choose receiving an electronic bill OR a paper bill, but not both at the same time. Providing the option to receive both an electronic bill and a paper bill at the same time would cause unnecessary costs and additional administrative issues while negating the benefit of electronic billing.

The Companies also believe Section 56.11(b)(7) should be deleted. Maintaining a system to ensure delivery of electronic bills via electronic mail would be difficult, if not

impossible. Individuals often will change their email addresses, and it should be the customer's obligation to notify the Companies of such a change. The Companies can ensure that the electronic mail that includes an electronic bill is sent to the address the customer has provided; however, to ensure the delivery of electronic bills would be overly burdensome and likely impossible.

3. § 56.12 Meter Reading; Estimated Billing; Customer Readings

Section 56.12(7) provides that utilities shall offer budget billing to customers. Specifically, the section includes one provision that calls for the amortization over a 3 to 12 month period of any amount exceeding \$25 resulting from a reconciliation. The FirstEnergy Companies do not support the proposed regulation to amortize any reconciliation amount greater than \$25. The purpose of the periodic reviews and adjustments is to lessen the impact of a high anniversary bill. However, it is possible that a customer's increased usage for the preceding month could impact an anniversary bill by \$25, a factor over which the Companies would have no control or knowledge until the actual meter reading is obtained for the anniversary or true-up bill. Amortizing this amount would be problematic if the customer is already on a payment agreement. In such a case, this provision would require adding a second payment agreement, or resetting the one already in existence, which would consequently distort the number of payment agreements for a customer.

Requiring an amortization for a reconciliation amount exceeding \$25 could also be unlawful as it may be inconsistent with Chapter 14 and subsequent Commission orders. Such an amortization required by Commission regulation would be tantamount to

a Commission-ordered payment agreement. If the customer already had a prior payment agreement established by the Commission and defaulted upon it, the Commission is prohibited from establishing a subsequent payment agreement. 66 Pa. C.S. § 1405(d); *See also, Chapter 14 Implementation*, Docket No. M-00041802F0002 (Reconsideration of Implementation Order entered October 31, 2005). Therefore, the requirement to amortize a reconciliation greater than \$25 over 3 to 12 months would be inconsistent with Chapter 14 because it could have the effect of granting second or subsequent payment agreements to some customers who may have defaulted on payments, in violation of 66 Pa. C.S. §1405(d). An additional violation of Chapter 14 could result if a customer is given 12 months to pay a reconciliation amount and that customer has a gross monthly household income exceeding 300% of the Federal poverty level and is only entitled to a PUC established payment agreement for not more than six months under 66 Pa. C.S. §1405(b)(4).

An administrative burden would also result because the Companies' computer system is unable to extend a payment agreement for a customer participating in the Pennsylvania Customer Assistance Program or add a second agreement for a customer at the same time an agreement exists on the system. This proposal would necessitate expensive programming changes and would make bill presentment confusing for the customer and problematic for the utility. Notwithstanding the comments set forth above, the proposed amount of \$25 seems extremely low to require such a radical and costly enhancement to system programming.

4. § 56.16 Transfer of Accounts

Section 56.16(d) states that in the event of service termination, a “utility may transfer to the account of a third-party guarantor any portion of the unpaid balance which is equivalent to the cash deposit requirement...” This is inconsistent with Chapter 14, specifically 66 Pa. C.S. §1404(b), which provides that the third-party guarantor “shall be responsible for all missed payments owed to the public utility.” The proposed regulations at Section 56.33 correctly clarifies the responsibility of the third-party guarantor that such guarantor shall be responsible for all missed payments owed to the public utility and is consistent with Chapter 14, specifically 66 Pa. C.S. §1404(b). Section 56.16(d) should be revised accordingly.

5. §56.22 Accrual of Late Payment Charges

Section 56.22(d) provides that a utility may waive late payment charges on any customer account, and the Commission may direct the waiver of late payment charges for customers with a gross income at or below 150% of the federal poverty level. The FirstEnergy Companies recommend that the Commission clarify this proposed regulation to clarify that the Commission may only direct such a waiver of late payment charges for customers at or below 150% of the federal poverty level as a result of the filing of an informal or formal complaint. Such Commission direction should only result from the review of a customer’s pending specific complaint and not a generic order that is not tied to a specific complaint.

6. §56.35 Payment of Outstanding Balance & §56.36 Written Procedures

The FirstEnergy Companies disagree with the proposed regulation at Section 56.35(b)(3) to include in a utility's retail tariff the procedures and standards used to determine an applicant's liability for an outstanding balance. Chapter 14 and the Commission's regulations provide the standards for determining liability for an outstanding balance. It would be unnecessary and overly burdensome to require a utility's procedures and standards to determine liability for an outstanding balance to be included in the tariffs. Additionally, the Companies already do and will continue to maintain written procedures pursuant to Section 56.36, albeit not in the retail tariff. To require this information to be maintained in yet another location would be redundant and unnecessary. Further, the specific procedures and standards utilized to determine liability are areas that fall under the discretion of utility management and, therefore, should not be required to be included in the tariff. *See, Metropolitan Edison Co. v. Pa. Public Utility Comm.*, 62 Pa. Commw. Ct. 460, 437 A.2d 76 (1981).

The Companies also wish to raise a similar concern regarding the proposed regulation at Section 56.36 which would require a utility to include in its tariff its credit and application procedures along with credit scoring methodology and standards. First, this is an area that falls under the discretion of utility management. *Id.* Second, credit scoring methodology and procedures are confidential and proprietary information that belongs to the credit scoring agencies. Moreover, the use of credit reports is governed at the federal level under the Fair Credit Reporting Act. 15 U.S.C. §1681 *et seq.* Placing this information in the tariff would jeopardize the confidential and proprietary nature of this information. Third, it would also be unnecessary and overly burdensome to require

credit standards to be included in the tariff; generally accepted credit scoring methodologies evolve over time, and it would be unreasonable to require a utility to update its tariff as such changes occur. For all of these reasons, it would be inappropriate to require that such information be included in a utility tariff that is open to public inspection.

In addition, the FirstEnergy Companies disagree with the proposal to provide an actual credit score to an applicant to which credit has been denied. Credit scores are not known to the Companies' customer service representatives, as only a "pass/fail" determination regarding credit is provided from the system. The credit scoring methodology and the score itself are proprietary and confidential. The Companies agree that Applicants should be provided with contact information to register questions and disputes regarding credit scores which is already done; however, since the specific score is not known by the company representative, there is no way to provide the specific score to an Applicant.

7. §56.38 Payment Period for Deposits by Applicants

Section 56.38 provides that an applicant may elect to pay any required deposits in three installments - 50% payable upon the determination that the deposit is required; 25% payable 30 days after such determination; and 25% payable 60 days after such determination. Inasmuch as this provision appears to apply to all deposits required of applicants, the FirstEnergy Companies recommend that this section be clarified as it is not consistent with Chapter 14.

The FirstEnergy Companies agree that an applicant seeking reconnection of service at the same location that was terminated for non-payment, *See*, 66 Pa. C.S. §1404(a)(1)(i), may pay the required deposit under an installment plan like the one described above as it is consistent with 66 Pa. C.S. §1404(h) which allows an applicant up to 90 days to pay the required deposit. However, pursuant to 66 Pa. C.S. §1404(a)(2), an applicant for the initiation of service at a new location may be required to pay the full deposit equal to one-sixth of the applicant's estimated bill prior to the initiation of service. Section 1404(h) clearly only applies to applicants required to pay a deposit upon reconnection. Due to this distinction as prescribed by Chapter 14, the proposed regulations should be revised accordingly.

8. §56.42 Payment Period for Deposits

Section 56.42 provides the same installment plan prescribed above in proposed Section 56.38 - that is, 50% payable upon determination that the deposit is required; 25% payable 30 days after such determination; and 25% payable 60 days after such determination. The proposed regulation appears to attempt to carve out a difference in this installment plan for customers who are required to pay a deposit as a condition to reconnection of service; however, it still provides for an installment plan which is inconsistent with Chapter 14.

Section 1404(h) specifically only provides for installment plans for applicants required to pay deposits upon reconnection, not customers. Therefore, a customer may be required to pay the full amount of the deposit upfront and as a condition for reconnection of service, and not in installments over a 90 day period. While companies

may, in their sole discretion, allow for the payment of deposits under an installment plan, it is not a requirement under Chapter 14 and, therefore, cannot be required under the proposed regulations.

9. §56.83 Unauthorized Termination of Service

Section 56.83(1) provides that service may not be terminated for nonpayment of concurrent service of the same class at a separate dwelling; however, the Commission proposes to clarify that “this does not include concurrent service periods of 90 days or less accrued during the transfer of service from one location to another.” Also, Section 56.83(11) maintains the provision that service cannot be terminated if the amount of the deposit held by the utility is within \$25 of the account balance. Both of these provisions are contrary to Chapter 14.

Chapter 14 provides that termination may occur for nonpayment of an undisputed delinquent account without any limitations. 66 Pa. C.S. §1406(a)(1). Further, Section 4 of Act 201 clarified that the Legislature intended to supersede “any inconsistent requirements imposed by law on utilities, including...requirements found in Chapter 56 at §§...56.83...” Section 56.83(11) is clearly inconsistent with Chapter 14 and, as a result, was to be superseded by the Act. Furthermore, the proposed additions to Section 56.83(1) are inconsistent with Chapter 14. These proposed revisions are contrary to 66 Pa. C.S. §1406(a)(1) because they would prevent the termination for non-payment of an undisputed delinquent amount; therefore, both of these proposed revisions should be deleted.

10. §56.114 Length of Postponement; Renewals

Section 56.114 includes a provision that limits the number of renewals of a medical certification for a customer's household to "two 30-day certifications that concern medical certificates filed for the same set of arrearages and same termination action." (Emphasis added). The FirstEnergy Companies agree that this limitation should be associated with the same set of arrearages; however, it should not be limited to the same termination action.

Termination notices are effective for 60 days. 66 Pa. C.S. § 1406(b)(1)(i). Therefore, after 60 days, a new termination notice must be issued resulting in a new termination action (or separate from the previous termination action). The renewal of two 30-day medical certificates will always require a new, or separate, termination action, if the account balance is still outstanding and eligible for termination. It will not take long for customers experienced with gaming the system to realize that each time they receive a termination notice they simply need to find a physician or nurse practitioner to renew two 30-day medical certificates and they will be able to avoid paying their electric bill. It would be unfair to a utility to allow the renewal of more than two 30-day medical certificates for the same set of arrearages. Therefore, the FirstEnergy Companies recommend that the language, "and same termination action" be deleted from this proposed regulation.

11. § 56.116 Duty of Customer to Pay Bills

Section 56.116 is proposed to be revised to require a customer whose service has been restored or termination postponed due to a medical emergency to pay current

undisputed bills or equal monthly billing amounts. This provision does not require such customer to pay any prior outstanding account balance. Not addressing any outstanding balance will likely cause arrears, write-offs and uncollectible amounts to increase, ultimately resulting in rate increases for the general customer base, which is contrary to the goals of the Act. This section should be amended to also include the duty to pay any outstanding account balances or make payment arrangements for such balances for customers subject to a medical emergency.

12. § 56.174 Ability to Pay Proceedings

Section 56.174 deals with formal cases regarding ability to pay proceedings. The FirstEnergy Companies wish to express one concern with the process outlined in this proposed regulation. The Companies agree with Section 56.174(c)(ii) which provides that the presiding officer will hear the case *de novo* but may request a stipulation of the parties as to the undisputed facts. However, the FirstEnergy Companies wish to raise a fundamental procedural concern with Section 56.174(c) which includes the following statement: "Subject to any valid evidentiary objections raised by the parties, the presiding officer will enter into the record BCS[s] documents on the complainant's income, the utility report to the BCS[s] from the utility, and the BCS[s] decision when the formal complaint was the subject matter of a BCS[s] informal decision."

The inclusion of this provision appears to presume that BCS documents, utility reports and BCS decisions are admissible evidence, unless the opposing party objects. In fact, it should be the other way around. The information described, without the preparer of the documents participating in the proceeding as a witness, is simply hearsay and

should not be admissible. Such assertions, attempted to be entered into the record and offered as evidence without a witness testifying at the proceeding, should not be permitted. A presiding officer should not be allowed to enter hearsay into the record in such a proceeding *sua sponte*. If a party wishes to attempt to have such evidence admitted in the record, the party must offer an appropriate witness to do so. Due to the procedural defects of the inclusion of this provision, it should be deleted.

13. § 56.191 General Rule (Restoration of Service)

Section 56.191(c)(1) provides a requirement that a utility shall inform an applicant or customer that conditions for restoration may differ if someone in the household is a victim of domestic violence with a protection from abuse order. The FirstEnergy Companies currently have procedures in place to address applicants and customers who are victims under a protection from abuse order. The Companies have also provided notice and education about these special protections to consumers through the use of the website and other special literature.

The FirstEnergy Companies are concerned about the unnecessary length of time that could be added to customer service calls if a customer service center representative must explain and offer this additional information on telephone calls. The responsibility should not rest with the utility to include statements in the scripts of customer service representatives to determine whether a caller is subject to provisions associated with individuals who are victims under a protection from abuse order. The FirstEnergy Companies request that this specific provision be deleted from this proposed regulation.

14. General Comment to Subchapters L through V

The FirstEnergy Companies are not steam heating, wastewater or small natural companies; therefore, these subsections only apply to the Companies regarding individuals who are a victim under a protection from abuse order. The FirstEnergy Companies agree that utility applicants or customers with protection from abuse orders are intentionally treated differently from other utility customers under Pennsylvania law. Explicitly, pursuant to 66 Pa. C.S. §1417, customers with protection from abuse orders are excluded from the applicability of Chapter 14.

As stated above, the FirstEnergy Companies have procedures in place to address applicants and customers who are victims under a protection from abuse order and have provided notice and education about the special protections available to these consumers. However, the Companies need to know that a customer or applicant possesses a protection from abuse order in order to apply the proper procedures when dealing with affected individuals. Therefore, the FirstEnergy Companies suggest that a general provision be added to Subchapters L through V that makes it clear that it is the responsibility of the individual purporting to possess a protection of abuse order to inform the utility of and prove the existence of the appropriate documentation supporting such a claim.

III. CONCLUSION

The FirstEnergy Companies appreciate the opportunity to provide comments on the Commission's proposed rulemaking relating to the implementation of Chapter 14.

Respectfully submitted,



Dated: April 20, 2009

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**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Rulemaking to Amend the Provisions of 52 Pa. Code, Chapter 56 to Comply with the Provisions of 66 Pa. C.S., Chapter 14; General Review of Regulations : **Docket No. L-00060182**

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 United Parcel Service, as follows:

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

Service via electronic mail, as follows:

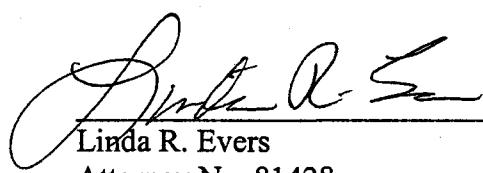
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Dated: April 20, 2009



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