

Gary A. Jack
Senior Corporate Counsel

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September 22, 2014

**VIA FEDEX OVERNIGHT
and EMAIL**

Mr. Thomas White
Ms. Lynne White
Consumer Advocate Division
Public Service Commission of West Virginia
700 Union Building
723 Kanawha Boulevard East
Charleston, WV 25301

03:27 PM SEP 23 2014 PSC EXEC SEC DIV

**Re: Monongahela Power Company and The Potomac Edison Company
Rule 42T Tariff Filing to Increase Rates and Charges
Case No. 14-0702-E-42T**

Dear Mr. White and Ms. White:

Enclosed please find two (2) copies of Monongahela Power Company's and The Potomac Edison Company's responses to the Consumer Advocate Division's Eighth Request for Information Nos. E-76, 78, 84, 85 and J-5 in the above-referenced case. Please note that E-78 Attachments A, B and C contain confidential information and should be treated according to the Protective Order entered in this case.

Sincerely,



Gary A. Jack
Senior Corporate Counsel
WV State Bar No. 1855

GAJ/bsm
Enclosures

cc: Ingrid Ferrell (via FedEx Overnight w/enc.)
Ralph Smith (via Fed Ex Overnight and email w/enc.)
Mike Majoros (via FedEx Overnight and email w/enc.)
John Auville (via US Mail w/enc.)
Susan J. Riggs, Esquire (via US Mail and email w/enc.)
Derrick Price Williamson (via US Mail and email w/enc.)

**Monongahela Power Company and The Potomac Edison Company
Case No. 14-0702-E-42T
Consumer Advocate Division's Eighth Request for Information**

The following response to E-76 of the Eighth Request for Information of the Consumer Advocate Division received on August 29, 2014 has been prepared under the supervision of the person identified below.

Name: Terri Kuhn and Ray Valdes
Title: Manager, Business Services (Kuhn) and
Advisor, Rates and Regulatory Affairs
(Valdes)
Company: FirstEnergy Service Company
Date: September 19, 2014

E-76.

Vegetation Management. Refer to the response to CAD E-45.

- a. Referring to Attachment A, please explain fully and in detail the "All Other" category of vegetation management costs, including the account in which such costs were recorded.
- b. For both Mon Power and Potomac Edison, please explain fully and in detail why Vegetation Management costs were capitalized to CWIP.
- c. Please provide similar data as that presented on Attachment A on a West Virginia jurisdictional basis for Mon Power and Potomac Edison for the period January through July 2014.
- d. Please confirm that the amounts reflected on Attachment A to CAD E-45 are West Virginia jurisdictional amounts. If not confirmed, please provide such amounts on a West Virginia jurisdictional basis.
- e. Referring to the footnote on Attachment A to CAD E-45, please explain fully and in detail why the Companies excluded costs such as new service and storm right-of-way costs. In addition, identify by account where these types of costs were recorded each year during the period 2008 through 2012, and show the amounts recorded in each account in each year.

Response:

- a. "All Other" vegetation management costs include costs that were recorded in FERC accounts other than Overhead Lines expenses and Construction Work in Progress. The costs are relatively small and are generally related to costs of spraying and management of vegetation control at various areas, such as substations, meter sites, power station waste disposal sites, office buildings, etc. See Attachment A to this response for costs by FERC account charged.

Monongahela Power Company and The Potomac Edison Company
Case No. 14-0702-E-42T
Consumer Advocate Division's Eighth Request for Information

E-76 (Concluded).

- b. See Attachment B this response for the vegetation capitalization policy.

During a recent audit, the FERC Division of Audits interpreted provisions of the Uniform System of Accounts (USofA) as set forth in 18 C.F.R. pt. 101, Account 571, Operating Expense Instruction No. 2(A) and Electric Plant Instruction No. 3(A) as requiring that first time clearing must be associated with construction to qualify for capitalization. Therefore, for FERC accounting purposes, costs for first time clearing of transmission right-of-way must be expensed when the first time clearing is not associated with construction. The clearing activity refers specifically to 1) widening of the corridor beyond the area previously cleared area, 2) removal of danger trees, which exist outside the corridor, but could fall into conductors and 3) removal of limbs that hang vertically into the corridor from above the corridor. This will create differences between US GAAP and FERC reporting. First time clearing activities performed on transmission circuits will be capitalized for US GAAP accounting and expensed for FERC accounting purposes.

- c. Please see below:

<u>Company</u>	<u>FERC</u>	<u>Jan-July 2014</u>
Mon Power	107	\$28,595,267
Mon Power	571	\$4,374,179
Mon Power	593	\$10,442,511
Potomac Edison-WV	107	\$5,746,600
Potomac Edison-WV	571	\$7,528
Potomac Edison-WV	593	\$3,154,839

- d. Excluding the amounts indicated in Attachment A to this interrogatory, the amounts reflected in response to CAD E-45 are West Virginia jurisdictional amounts.
- e. The costs for 2008 through 2012 were not collected by the requested categories prior to SAP implementation in 2012 and are not readily available.

West Virginia Right-of-Way Vegetation Historical Spend

		Mon Power West Virginia				
FERC		2008	2009	2010	2011	Q1 2012
185 (excluded)	Temporary Facilities (Major Only)	1,135		1,016	3,161	
426 (excluded)	Donations		6,714			
182	Regulatory Asset		9			
501	Fuel (Spraying at waste disposal site)		2,101			
506	Misc Steam Power Exp (Spraying at Power Stataions)		11,713			
510	Maintenance Supervision and Engineering		3,772			
513	Maintenance of Electric Plant		2,386			
571	Maintenance of Overhead Lines		(2,230)			
593	Maintenance of Overhead Lines		(17,176)			
107	Construction Work in Progress		11,921			
562	Station Expenses (Major Only)	47,927	165	14,064	1,283	
570	Maintenance of Station Equipment	8,789	21,671	20,658	19,881	
582	Station Expenses (Major Only)	24,740	135	11,507	1,050	
583	Overhead Line Expenses (Major Only)	2,623	3,234	1,452	2,232	
584	Distribution Oper Underground Line Expense	40				
586	Meter Expenses	1				
588	Miscellaneous Distribution Expenses	5,060		981	14,356	630
590	Maintenance Supervision & Engineering	(86,490)	(190,716)			
592	Maintenance of Station Equipment	17			21,927	
594	Distribution Maintenance Underground Lines	52,928	158,910	132,903	77,481	
595	Maintenance of Line Transformers	114	19	10	77	
596	Maintenance of Street Lights	88	527	125	204	
597	Maintenance of Meters	2,151	1,141	1,447	184	
921	Office Supplies and Expenses	(17,303)	(37,684)		68	
935	Maintenance of General Plant	(55,342)	(120,005)	520	515	
421 (excluded)	Other Income - Premium Services	4,600	382			
Total All Other Vegetation Control		(8,922)	(143,012)	184,683	142,419	630

Potomac Edison West Virginia

		2008	2009	2010	2011	Q1 2012
FERC						
562	Station Expenses (Major Only)	8,223		2,097		
570	Maintenance of Station Equipment	406	5,692	1,415	4,831	
582	Station Expenses (Major Only)	9,279		4,669		
583	Overhead Line Expenses (Major Only)	3,332	776	939	354	
586	Meter Expenses	11				
588	Miscellaneous Distribution Expenses	194	6,850			
592	Maintenance of Station Equipment				5,150	
594	Distribution Maintenance Underground Lines	25,454	17,120	16,342	13,548	
595	Maintenance of Line Transformers	18	28	29	37	
596	Maintenance of Street Lights		1			
597	Maintenance of Meters		-		61	
921	Office Supplies and Expenses			190		
Total All Other Vegetation Control		46,917	30,467	25,681	23,981	-

FirstEnergy Corp
 SOP # FE-PAS-VEG Revision: _____
 Effective Date: April 17, 2008

Page 1 of 3
 Prepared by: Lisa Wilson
 Approved by: Harvey Wagner

Title: ACCOUNTING FOR THE CLEARING OF TRANSMISSION AND DISTRIBUTION CORRIDORS

Policy: Costs incurred in connection with the initial clearing and grading of land associated with the construction of transmission and distribution facilities, as well as increasing the horizontal and vertical corridors, shall be capitalized and depreciated. Expenditures with a useful life of more than 12 months and that prolong the useful life expectancy or increase the economic value of transmission and distribution facilities shall also be capitalized. All other transmission and distribution corridor clearing costs shall be charged to expense.

Purpose: The purpose of this procedure is to define the guidelines for accounting for the clearing of transmission and distribution corridors and to delineate those expenditures that are to be capitalized or expensed.

Scope: All expenditures associated with the clearing and widening of transmission and distribution horizontal and vertical clearing corridors and the removal of trees or limbs located within or outside the clearing corridor that could damage poles, circuits and conductors.

Definitions: The corridor clearing zone is the area where the normal routine maintenance is performed. The distribution corridor clearing zone is measured at a distance of fifteen (15) feet on either side of (horizontal) and above (vertical) the pole line. The transmission corridor clearing zone is specified as the established large tree edge and not above the pole line.

Priority trees and large limbs are defined as any tree or large limb within the corridor, but located outside the actual corridor clearing zone, that is dead, dying, diseased, or severely encroaching such that if it fell it could cause damage to poles, circuits, conductors, etc., or any other tree or large limb that, due to its proximity, shape, type or size, otherwise endangers these assets.

Capitalized costs are those which, in accordance with generally accepted accounting principles (GAAP), have a useful life greater than one year, add value to the asset, prolong the asset's intended useful life, increase efficiency and/or provide a future economic benefit.

Expenses are those costs which, under GAAP, are necessary for the upkeep of property that neither add to the permanent value of the property nor prolong its intended useful life but that keep the asset in an efficient operating condition.

**Accounting For The Clearing of
Transmission and Distribution Corridors****Procedure:****1. CAPITALIZATION**

- 1.1. All expenditures associated with the initial clearing of transmission and distribution corridors shall be capitalized.
- 1.2. Expenditures, such as removals, pruning, brush clearings, etc., associated with the initial widening of an existing corridor clearing zone shall be capitalized. Examples include:
 - 1.2.1. increasing initial distribution corridor clearing zones from 10 to 15 feet; and
 - 1.2.2. expanding the initial transmission clearing zone corridor.
- 1.3. Expenditures associated with the subsequent removal of priority trees or other large tree limbs outside the corridor (where no future tree maintenance is required) shall be capitalized. The removal of tree limbs that overhang at a height 15 feet or more above conductors with voltages below 115 kv and which emanate from trees growing within the corridor shall be capitalized. If in the process of directionally pruning the overhang fifteen feet or higher, it becomes necessary to remove the entire tree, the tree removal cost shall be capitalized.
- 1.4. Allowance for Funds Used During Construction shall not be applied to the subsequent removal of priority trees or large tree limbs.

2. EXPENSE

- 2.1. Expenditures associated with the clearing or reclamation of an existing corridor clearing zone that are not capitalized in accordance with this policy shall be expensed. Such charges include:
 - 2.1.1. routine circuit maintenance,
 - 2.1.2. customer ticket work,
 - 2.1.3. clearing overgrown vegetation and overhang within the initial corridor clearing zone that are not capitalized under 1.2 above; and
 - 2.1.4. herbicide programs.

3. ASSET RECORDS

- 3.1. There shall be supporting documentation (i.e. timesheets) and tracking codes/ systems in place to properly record the capital activities. The capital cost tracking codes capturing the costs must be specific to each of the capital activities, requiring field personnel to fully understand the proper tracking codes to use for each capital activity. The supporting detail shall be readily available to support the capital charges in accordance with this policy. Historical tracking of corridor clearing zones that were widened and the removal of priority trees or other large limbs inside or outside the corridor must be maintained to prevent inappropriate capitalization of widening corridor-clearing zones in the future.

**Accounting For The Clearing of
Transmission and Distribution Corridors**

- 3.2. Capitalized costs shall be transferred monthly to plant in service. Transmission line costs must designate the name of the line and voltage designation as appropriate. The interest profiles to create the Work Breakdown Structure are DLLANDB (distribution) and TLLANDB (transmission).

4. DEPRECIATION OF CAPITALIZED COSTS

- 4.1. Costs that are capitalized in accordance with this policy shall be allocated among the associated overhead conductors and devices (Account 356, Overhead conductors and devices, for transmission or Account 365, Overhead and Conductors, for distribution) benefited and depreciated using the depreciation rates for those accounts approved by the applicable state or federal regulatory commission.

Monongahela Power Company and The Potomac Edison Company
Case No. 14-0702-E-42T
Consumer Advocate Division's Eighth Request for Information

The following response to E-78 of the Eighth Request for Information of the Consumer Advocate Division received on August 29, 2014 has been prepared under the supervision of the person identified below.

Name:	Barbara Jameson
Title:	Supervisor, HRIS
Company:	FirstEnergy Service Company
Date:	September 17, 2014

E-78.

Labor Expense. Please provide the number of Mon Power and Potomac Edison employees, by job title and the annual salary/wages, as of December 31, 2011, December 31, 2012, December 31, 2013, and for the most recent month available in 2014.

Response:

See Attachment A to this response for FE Generation (for Mon Power), Attachment B for Mon Power Delivery, and Attachment C for Potomac Edison. There were no employees of Mon Power and Potomac Edison prior to March 2012 since all Allegheny Energy, Inc. personnel were employed by Allegheny Energy Service Corporation.

Please note, Attachments A, B and C contain CONFIDENTIAL information and are being provided pursuant to the terms of the Confidentiality Agreement executed by CAD in this proceeding.

Monongahela Power Company and The Potomac Edison Company
Case No. 14-0702-E-42T
Consumer Advocate Division's Eighth Request for Information

The following response to E-84 of the Eighth Request for Information of the Consumer Advocate Division received on August 29, 2014 has been prepared under the supervision of the person identified below.

Name: Meghan C. Jurica
Title: Lead, Rates Support
Company: FirstEnergy Service Company
Date: September 17, 2014

E-84.

Rate Case Expense. Refer to the Direct Testimony of Meghan Jurica and Statement G, WP-17. On page 7 of her testimony, Ms. Jurica stated that the Companies projected rate case expense relates to items including rate of return studies, depreciation studies, rate case preparation, legal fees, etc.

- a. Please explain fully and in detail the distinction between external and internal rate case expense.
- b. Please provide supporting documentation (e.g., contracts, invoices, quotes, budget details, etc.) for Mon Power's and Potomac Edison's estimates for external rate case expense in the amounts of \$577,822 and \$203,970, respectively. In addition, please break out these amounts out by the expense categories discussed on page 7 of Ms. Jurica's testimony (and referenced above).
- c. Please provide supporting documentation (e.g., contracts, invoices, quotes, budget details etc.) for Mon Power's and Potomac Edison's estimates for internal rate case expense in the amounts of \$73,473 and \$25,936, respectively.
- d. Please explain fully and in detail why the Companies are reflecting rate case expense in Account 930.2 - Miscellaneous General Expenses versus reflecting such costs in Account 928 - Regulatory Commission Expenses.
- e. For each Company's estimate for external and internal rate case expense, please provide monthly updates that reflect actual rate case expense incurred throughout the course of this proceeding.
- f. Please provide the level of rate case expense incurred for Mon Power's and Potomac Edison's last five West Virginia rate cases, broken down by payee and/or type of activity.

Monongahela Power Company and The Potomac Edison Company
Case No. 14-0702-E-42T
Consumer Advocate Division's Eighth Request for Information

E-84 (Concluded).

Response:

- a. External rate case expense relates to rate case expense incurred on behalf of the Companies by consultants or legal personnel not directly employed by the Companies. Internal rate case expense relates to rate case expense incurred directly by employees of the Companies.
- b. See Attachment A to this response.
- c. See Attachment A to this response.
- d. The Companies are not reflecting rate case expenses in Account 930.2 – Miscellaneous General Expenses. The Companies are reflecting rate case expenses in Account 928 - Regulatory Commission Expenses, as indicated in Statement G and associated workpaper WP-17 of the Companies Rule 42T filing. Statement A, Schedule 2 in Volumes I and II of the Companies Rule 42T filing also reflect rate case expenses in Account 928. Statement A, Schedule 2 in Volume III of the Companies Rule 42T filing inadvertently has rate case expenses listed in Account 930.2, but this is solely a transposition error and has no net effect on the Companies requested rate increase.
- e. See Attachment B to this response.
- f. Listed below are rate case expenses from the 2006 rate case and the 2009 rate case. Rate case expenses prior to 2006 are not provided since they are over 20 years old and beyond a normal retention period.
 - 2006 Mon Power & Potomac Edison rate case expense = \$1,265,569
(fully litigated rate case with separate depreciation study)
 - 2009 Mon Power & Potomac Edison rate case expense = \$211,206
(settled rate case without separate depreciation study)

CAD Set 8, E-84, Attachment A

External Legal Fees and Expenses by Month
2006 Rate Case

Year	Hours	Total	Effective Rate
2006	438.5	\$ 96,683	\$ 220.49
2007	1,093.2	\$ 247,763	\$ 226.64
Total	1,531.7	\$ 344,446	\$ 224.88

External Legal Fees and Expenses by Month
2009 Rate Case

Year	Hours	Total	Effective Rate
2009	155.5	\$ 35,766	\$ 230.00
2010	515.5	\$ 141,141	\$ 273.79
Total	671.0	\$ 176,906	\$ 263.65

External Legal Fees and Expenses by Month
2014 Rate Case

Year	2006-2007 Hours with 10% Contingency	Total	4-Year Increase in Effective Rate	
2014-2015	1,684.9	\$ 572,839	\$ 339.99	<i>External expense</i>

Brattle Estimate with 10% Contingency \$ 110,000 *External expense*

Gannett Fleming with 10% Contingency \$ 73,953 *External expense*

Tax Witness Estimate \$ 25,000 *External expense*

Bill Inserts \$ 5,200
 Duplication of Filing \$ 11,000
 Total \$ 16,200 *Internal expense*

Newspaper Publication Estimate \$ 49,200 *Internal expense*

Employee Expense Estimate
 (excluding straight-time labor) \$ 34,009 *Internal expense*

External Expense Total \$ 781,792 Company Split %
 Mon Power Portion \$ 577,822 73.91%
 Potomac Edison-WV Portion \$ 203,970 26.09%

Internal Expense Total \$ 99,409 Company Split %
 Mon Power Portion \$ 73,473 73.91%
 Potomac Edison-WV Portion \$ 25,936 26.09%

Internal Order No.	Internal Order Description	Month								Totals
		Jan-14	Feb-14	Mar-14	Apr-14	May-14	Jun-14	Jul-14	Aug-14	Jan to Aug 2014
3001553	2014 WVPSC BRC - Customer Notice	\$ -	\$ -	\$ -	\$ -	\$ 2,539.74	\$ 13,994.61	\$ 14,290.15	\$ -	\$ 30,824.50
3001554	2014 WVPSC BRC - Printing/Postage	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 10,031.00	\$ 8,152.93	\$ (75.55)	\$ 18,108.38
3001555	2014 WVPSC BRC - Brattle Witness	\$ -	\$ -	\$ 1,410.50	\$ 10,395.60	\$ 15,675.00	\$ -	\$ 25,820.00	\$ 2,817.50	\$ 56,118.60
3001556	2014 WVPSC BRC - Gannett Fleming	\$ -	\$ -	\$ -	\$ 17,297.53	\$ -	\$ -	\$ -	\$ 9,495.68	\$ 26,793.21
3001557	2014 WVPSC BRC - External Legal Fees	\$ -	\$ -	\$ 1,102.25	\$ 43,503.84	\$ 19,245.24	\$ (657.33)	\$ 38,074.97	\$ 78,978.70	\$ 180,247.67
3001558	2014 WVPSC BRC - Employee Expenses	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
3002213	2014 WVPSC BRC - Tax Witness	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 9,372.50	\$ 4,482.50	\$ 815.00	\$ 14,670.00
Total WV Rate Case Expenses By Month		\$ -	\$ -	\$ 2,512.75	\$ 71,196.97	\$ 37,459.98	\$ 32,740.78	\$ 90,820.55	\$ 92,031.33	\$ 326,762.36

Mon Power and Potomac Edison Allocation of Rate Case Expenses by Month

	Allocation Percentage	Month								Totals
		Jan-14	Feb-14	Mar-14	Apr-14	May-14	Jun-14	Jul-14	Aug-14	Jan to Aug 2014
Mon Power	73.91%	\$ -	\$ -	\$ 1,857.17	\$ 52,621.68	\$ 27,686.67	\$ 24,198.71	\$ 67,125.47	\$ 68,020.36	\$ 241,510.06
Potomac Edison-WV	26.09%	\$ -	\$ -	\$ 655.58	\$ 18,575.29	\$ 9,773.31	\$ 8,542.07	\$ 23,695.08	\$ 24,010.97	\$ 85,252.30

Monongahela Power Company and The Potomac Edison Company
Case No. 14-0702-E-42T
Consumer Advocate Division's Eighth Request for Information

The following response to E-85 of the Eighth Request for Information of the Consumer Advocate Division received on August 29, 2014 has been prepared under the supervision of the person identified below.

Name:	Meghan C. Jurica
Title:	Lead, Rates Support
Company:	FirstEnergy Service Company
Date:	September 17, 2014

E-85.

Postage Expense. Refer to the Direct Testimony of Meghan Jurica and Statement G, WP-17. Please explain fully and in detail how the postage expense increase percentages of 5.6270% (Mon Power) and 5.5317% (Potomac Edison) were derived. Show detailed calculations.

Response:

The question is assumed to refer to Statement G, WP-18 instead of Statement G, WP-17. The percentages in Statement G, WP-18 were derived by dividing the postage cost effective as of January 26, 2014 by the weighted average postage cost effective in 2013, and subtracting by 1. The postage cost effective in 2013 was weighted based on the monthly balance in the general ledger account for postage. Please see Statement G, WP-18 in Volumes II and III of the Companies Rule 42T filing and the electronic version provided in response to CAD A-22 for detailed calculations.

Monongahela Power Company and The Potomac Edison Company
Case No. 14-0702-E-42T
Consumer Advocate Division's Eighth Request for Information

The following response to J-5 of the Eighth Request for Information of the Consumer Advocate Division received on August 29, 2014 has been prepared under the supervision of the person identified below.

Name: Susan Colflesh
Title: Analyst, FEU Business Services
Company: FirstEnergy Service Company
Date: September 17, 2014

J-5.

Refer to the responses to CAD J-3 and CAD E-36.

- a. Please reconcile the test year membership dues which totaled \$224,005 and \$105,204 for Mon Power and Potomac Edison, respectively, to Attachment A from CAD E-36, which indicates test year corporate memberships and dues totaling \$217,835 and \$103,065 for Mon Power and Potomac Edison, respectively.
- b. The response to CAD J-3 states that the Potomac Edison membership dues are total Company amounts. Please provide Potomac Edison's membership dues on a West Virginia jurisdictional basis.
- c. Referring to part "b" above, please clarify whether the Mon Power test year membership dues are total Company or West Virginia jurisdictional amounts. If they are total Company amounts, please provide such membership dues on a West Virginia jurisdictional basis.
- d. Please provide a breakout of Mon Power's and Potomac Edison's Edison Electric Institute (EEI) dues by component (e.g., regular dues, lobbying, marketing, etc.).
- e. Provide the EEI invoices for 2011, 2012, 2013 and 2014 to date.
- f. Show how the EEI dues amounts are allocated among the FirstEnergy companies for each year 2011 through 2014.

Response:

- a. CAD J-3 requested membership dues included in the cost of service whereas CAD E-36 requested major components of Miscellaneous General Expense. Accordingly, the response provided to CAD E-36 included only memberships charged to FERC account 930.2, Miscellaneous General Expense, while the response to CAD J-3 included all memberships in the cost of service, regardless of the FERC account charged. Please see below:

	Mon Power	Potomac Edison
<u>FERC 930.200</u>		
Industry Association Dues	\$ 43,442	\$ 7,039
Membership Dues - Trade	128,112	86,147
Membership Dues - Civic	46,281	9,879
Per CAD E-36	<u>217,835</u>	<u>103,065</u>
 Additional Memberships not in FERC 930.200	 6,169	 2,139
Per CAD J-03	<u>\$ 224,004</u>	<u>\$ 105,204</u>

- b. The Potomac Edison West Virginia jurisdictional membership dues are \$34,122.
- c. The Monongahela Power test year membership dues provided in response to CAD J-3 are total Company. The Monongahela Power West Virginia jurisdictional membership dues are \$223,546.
- d. Please see below:

<u>12 months ended December 31, 2013</u>	<u>Monongahela</u>	
	Power	Potomac Edison
Trade Dues (included in cost of service)		
Regular activities	\$ 115,291	\$ 75,823
Industry issues	9,755	6,416
Mutual Assistance Program	316	208
	<u>125,362</u>	<u>82,447</u>
 Lobbying (not included in cost of service)		
Regular activities	32,518	21,386
Industry issues	5,025	3,305
	<u>37,543</u>	<u>24,691</u>
 Total EEI Dues	 <u>\$ 162,905</u>	 <u>\$ 107,138</u>

- e. See Attachment A to this response.
- f. See Attachment B to this response.



Edison Electric Institute
Power by Association

701 Pennsylvania Avenue, N.W. • Washington, D.C. 20004-2696 • Phone (202) 608-6000

Invoice for Membership Dues

MR. ANTHONY J. ALEXANDER
PRESIDENT & CEO
FIRSTENERGY CORP
76 SOUTH MAIN ST
AKRON, OH 44308-1812

Date	Invoice Number
11/27/2013	Dues201427

Payment due on or before 1/31/2014

Description	Total
2014 EEL Membership Dues for:	
Regular Activities of Edison Electric Institute ¹	\$2,310,170
Industry Issues ²	231,017
Restoration, Operations, and Crisis Management Program ³	5,000
2014 Contribution to The Edison Foundation, which funds IEE ⁴	50,000
Total	\$2,606,187

¹ The portion of 2014 membership dues relating to influencing legislation, which is not deductible for federal income tax purposes, is estimated to be 18%.

² The portion of the 2014 Industry Issues support relating to influencing legislation is estimated to be 40%.

³ The Restoration, Operations, and Crisis Management Program funds improvements to industry-wide responses to major outages; continuity of industry and business operations; and EEL's ad hazards support and coordination of the industry during times of crises. No portion of this assessment is allocable to influencing legislation.

⁴ The Edison Foundation is an IRC 601(c)(3) educational and charitable organization. Contributions are deductible for federal income tax purpose to the extent provided by law. Please consult your tax advisor with respect to your specific situation.

PLEASE NOTE INFORMATION FOR ELECTRONIC PAYMENT

The following instructions should be used when transferring funds electronically (ACH or wire) to Edison Electric Institute:

Beneficiary's Bank: Wells Fargo Bank, N.A.
 Bank's Address: Washington, DC
 Bank's ABA Number: 121000248
 Beneficiary: Edison Electric Institute
 Beneficiary's Acct No: 2000013842887
 Beneficiary's Address: 701 Pennsylvania Avenue, NW
 Washington, DC 20004-2696 USA
 Beneficiary Reference: 2014 Membership Dues

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 DEC 02 2013
 A.,J. ALEXANDER

Please refer any questions to Terri Oliva, EEL Controller: (202) 608-5541 or memberdues@eel.org



Edison Electric Institute
Power by Association

701 Pennsylvania Avenue, N.W. ■ Washington, D.C. 20004-2696 ■ Phone (202) 608-5000

Invoice for Membership Dues

MR. ANTHONY J. ALEXANDER
 PRESIDENT & CEO
 FIRSTENERGY CORP
 76 SOUTH MAIN ST
 AKRON, OH 44308-1812

Date	Invoice Number
11/21/2012	DUES201328

Payment due on or before 1/31/2013

Description	Total
2013 EEI Membership Dues for:	
Regular Activities of Edison Electric Institute ¹	\$2,336,767
Industry Issues ²	233,677
Restore Power ³	5,000
2013 Contribution to The Edison Foundation, which funds IEE ⁴	50,000
Total	\$2,625,444

- 1 The portion of 2013 membership dues relating to influencing legislation, which is not deductible for federal income tax purposes, is estimated to be 22%.
- 2 The portion of the 2013 Industry Issues support relating to influencing legislation is estimated to be 34%.
- 3 Restore Power is related to improvements for the rapid response to disasters. No portion of this assessment is allocable to influencing legislation.
- 4 The Edison Foundation is an IRC 501(c)(3) educational and charitable organization. Contributions are deductible for federal income tax purpose to the extent provided by law. Please consult your tax advisor with respect to your specific situation.

PLEASE NOTE INFORMATION FOR ELECTRONIC PAYMENT

The following instructions should be used when transferring funds electronically (ACH or wire) to Edison Electric Institute:

Beneficiary's Bank: Wells Fargo Bank, N.A.
 Bank's Address: Washington, DC
 Bank's ABA Number: 121000248
 Beneficiary: Edison Electric Institute
 Beneficiary's Acct No: 2000013842897
 Beneficiary's Address: 701 Pennsylvania Avenue, NW
 Washington, DC 20004-2696 USA
 Beneficiary Reference: 2013 Membership Dues

A.J. Alexander
 11/25/12

RECEIVED
 NOV 28 2012
 A.J. ALEXANDER

Please refer any questions to Terr Oliva, EEI Controller: (202) 508-5541 or memberdues@eei.org



Edison Electric Institute
Power by Association

701 Pennsylvania Avenue, N.W. • Washington, D.C. 20004-2696 • Phone (202) 508-5000

Invoice for Membership Dues

MR. ANTHONY J. ALEXANDER
PRESIDENT AND CEO
FIRSTENERGY CORP
76 SOUTH MAIN ST
AKRON, OH 44308-1812

Date	Invoice Number
11/28/2011	DUES201230

Payment due on or before 1/31/2012

Description	Total
2012 EEI Membership Dues for:	
Regular Activities of Edison Electric Institute ¹	\$2,281,334
Industry Issues ²	228,133
Restore Power ³	5,000
2012 Contribution to The Thomas Alva Edison Foundation (Edison Foundation), including the Institute for Electric Efficiency⁴	30,000
Total	\$2,544,467

- 1- The portion of 2012 membership dues relating to influencing legislation, which is not deductible for federal income tax purposes, is estimated to be 26%.
- 2- The portion of the 2012 industry issues support relating to influencing legislation is estimated to be 36%.
- 3- Restore Power is related to improvements for the rapid response to disasters. No portion of this assessment is allocable to influencing legislation.
- 4- The Edison Foundation is an IRC 501(c)(3) educational and charitable organization. The Institute for Electric Efficiency is a program of the Edison Foundation. Contributions are deductible for federal income tax purpose to the extent provided by law. Please consult your tax advisor with respect to your specific situation.

PLEASE NOTE INFORMATION FOR ELECTRONIC PAYMENT

The following instructions should be used when transferring funds electronically to Edison Electric Institute's account at Wells Fargo Bank:

Beneficiary's Bank: Wells Fargo
 Bank's Address: Washington, DC
 Bank's ABA Number: 121000248
 Beneficiary: Edison Electric Institute
 Beneficiary's Acct No: 2000013842897
 Beneficiary's Address: 701 Pennsylvania Avenue, NW
 Washington, DC 20004-2696 USA
 Beneficiary Reference: 2012 Membership Dues

OL
12-1-11

Please refer any questions to Terri Oliva, EEI Controller: (202) 508-5541 or Toliva@eei.org

DEC 01 2011

A.J. OLIVA



701 PENNSYLVANIA AVENUE, NW
 WASHINGTON, DC 20004-2696
 PHONE (202) 508-5000

INVOICE FOR MEMBERSHIP DUES

MR. PAUL J. EVANSON
 CHAIRMAN, PRESIDENT & CEO
 ALLEGHENY ENERGY INC
 800 CABIN HILL DR
 GREENSBURG, PA 15601-1689

Date	Invoice Number
11/15/2010	DUES201103

*Payment Due on or before 2/1/2011
 (Interest charges will accrue after due date)*

Description	Total
This invoice reflects the five percent increase in EEI regular activity dues unanimously approved by the EEI Board of Directors on June 16, 2010. Each company's dues will vary based on changes in company statistics and the relative change in those statistics.	
2011 EEI Membership Dues for:	
Regular Activities of Edison Electric Institute ¹	\$853,048
Industry Issues ²	85,305
Mutual Assistance Program ³	5,000
2011 Contribution to The Thomas Alva Edison Foundation (Edison Foundation), including the Institute for Electric Efficiency The Edison Foundation is an IRC 501(c)(3) educational and charitable organization. The Institute for Electric Efficiency (IEE) is a program of the Edison Foundation. Contributions are tax deductible in the same manner as contributions to any 501(c)(3) organization.	30,000
Total	\$973,353
	\$ 943,353
1- The portion of membership dues allocable during 2011 relating to influencing legislation not deductible for federal income tax purposes is estimated to be 21%. 2- The portion of the voluntary industry issues allocable during 2011 relating to influencing legislation is estimated to be 35%. 3- Voluntary assessment approved by EEI Executive Committee relating to improvements for the rapid response to disasters. No portion of this assessment is allocable to influencing legislation.	

PLEASE NOTE INFORMATION FOR WIRING.

The following is instruction for transferring funds electronically to Edison Electric Institute's account at the Wachovia Bank N.A. in Washington, DC:

Beneficiary's Bank: Wachovia Bank, N.A.
 Bank's Address: Washington, DC
 Bank's ABA Number: 054001220
 Beneficiary: Edison Electric Institute
 Beneficiary's Acct No: 2000013842897
 Beneficiary's Address: 701 Pennsylvania Avenue, NW
 Washington, DC 20004-2696 USA
 Beneficiary Reference: 2011 Membership Dues

Please refer any questions to Terri Oliva at: phone-(202) 508-5541; fax-(202) 508-5037; or e-mail- Toliva@eei.org.

Edison Electric Institute
2014 Membership Dues

2014 Membership Dues Breakdown		
Regular Activities EEI		\$2,310,170.00
18% Lobbying	\$415,830.60	
82% Trade Dues	\$1,894,339.40	
Industry Issues		\$231,017.00
40% Lobbying	\$92,406.80	
60% Trade Dues	\$138,610.20	
Mutual Assistance Program		\$5,000.00
100% Trade Dues	\$5,000.00	
FE Foundation made donation to Edison Foundation		\$50,000.00
100% Trade Dues	\$50,000.00	
*Do not Exclude for 2014		
Total		\$2,596,187.00
Lobbying	\$508,237.40	
Trade Dues	\$2,037,949.60	

Company Code	Alloc %
1200	3.86%
1101	40.64%
OE01	9.76%
CE01	6.41%
TE01	3.19%
PP01	1.32%
ME01	5.38%
PN01	6.05%
JC01	12.03%
MP01	3.41%
PE10	3.20%
WP01	4.75%
Total	100.00%

Company Code	Lobbying		Trade Dues		Total		Company Code	Amount
	Year Total	Per Month	Year Total	Per Month	Year Total	Per Month		
1200	\$19,617.96	\$1,634.83	\$78,664.85	\$6,555.40	\$98,282.81	\$8,190.23	1200	\$98,282.81
1101	\$206,547.68	\$17,212.31	\$828,222.72	\$69,018.56	\$1,034,770.40	\$86,230.87	1101	\$1,034,770.40
OE01	\$49,603.97	\$4,133.66	\$198,903.88	\$16,575.32	\$248,507.85	\$20,708.98	OE01	\$248,507.85
CE01	\$32,578.02	\$2,714.84	\$130,632.57	\$10,886.05	\$163,210.59	\$13,600.89	CE01	\$163,210.59
TE01	\$16,212.77	\$1,351.06	\$65,010.59	\$5,417.55	\$81,223.36	\$6,768.61	TE01	\$81,223.36
PP01	\$6,708.73	\$559.06	\$26,900.93	\$2,241.74	\$33,609.66	\$2,800.80	PP01	\$33,609.66
ME01	\$27,343.17	\$2,278.60	\$109,641.69	\$9,136.81	\$136,984.86	\$11,415.41	ME01	\$136,984.86
PN01	\$30,748.36	\$2,562.36	\$123,295.95	\$10,274.66	\$154,044.31	\$12,837.02	PN01	\$154,044.31
JC01	\$61,140.96	\$5,095.08	\$245,165.33	\$20,430.44	\$306,306.29	\$25,525.52	JC01	\$306,306.29
MP01	\$17,330.90	\$1,444.24	\$69,494.07	\$5,791.17	\$86,824.97	\$7,235.41	MP01	\$86,824.97
PE10	\$16,263.60	\$1,355.30	\$65,214.38	\$5,434.53	\$81,477.98	\$6,789.83	PE01	\$81,477.98
WP01	\$24,141.28	\$2,011.77	\$96,802.64	\$8,066.89	\$120,943.92	\$10,078.66	WP01	\$120,943.92
*1000	\$0.00	\$0.00	\$50,000.00	\$4,166.67	\$50,000.00	\$4,166.67	1000	\$50,000.00
Total	\$508,237.40	\$42,353.12	\$2,087,949.60	\$173,995.79	\$2,596,187.00	\$216,348.91	Total	\$2,596,187.00

* Do not allocate to Operating Companies or to Generation.

Edison Electric Institute
2013 Membership Dues
As allocated Post Generation Asset Swap (Oct to Dec 2013)

2013 Membership Dues Breakdown		
Regular Activities EEI		\$2,336,767.00
22% Lobbying	\$514,088.74	
78% Trade Dues	\$1,822,678.26	
Industry Issues		\$233,677.00
34% Lobbying	\$79,450.18	
66% Trade Dues	\$154,226.82	
Mutual Assistance Program		\$5,000.00
100% Trade Dues	\$5,000.00	
FE Foundation made donation to Edison Foundation		\$50,000.00
100% Trade Dues	\$50,000.00	
*Do not Exclude for 2013		
Total		\$2,625,444.00
Lobbying	\$593,538.92	
Trade Dues	\$1,981,905.08	

Company Code	Lobbying	Trade Dues
	Alloc %	Alloc %
1200	3.04%	3.04%
1101	30.53%	0.00%
OE01	9.34%	9.34%
CE01	4.91%	4.91%
TE01	3.12%	3.12%
PP01	1.41%	1.41%
ME01	5.95%	5.95%
PN01	6.63%	6.63%
JC01	12.20%	12.20%
MP	13.09%	43.62%
PE01	4.16%	4.16%
WP01	5.62%	5.62%
Total	100.00%	100.00%

Company Code	Lobbying		Trade Dues		Total		Company Code	Amount
	Year Total	Per Month*	Year Total	Per Month*	Year Total	Per Month*		
1200	\$18,043.58	\$1,503.63	\$60,249.91	\$5,020.83	\$78,293.49	\$6,524.46	1200	\$78,293.49
1101	\$181,207.43	\$15,100.62	\$0.00	\$0.00	\$181,207.43	\$15,100.62	1101	\$181,207.43
OE01	\$55,436.54	\$4,619.71	\$185,109.93	\$15,425.83	\$240,546.47	\$20,045.54	OE01	\$240,546.47
CE01	\$29,142.76	\$2,428.56	\$97,311.54	\$8,109.30	\$126,454.30	\$10,537.86	CE01	\$126,454.30
TE01	\$18,518.41	\$1,543.20	\$61,835.44	\$5,152.95	\$80,353.85	\$6,696.15	TE01	\$80,353.85
PP01	\$8,368.90	\$697.41	\$27,944.86	\$2,328.74	\$36,313.76	\$3,026.15	PP01	\$36,313.76
ME01	\$35,315.57	\$2,942.96	\$117,923.35	\$9,826.95	\$153,238.92	\$12,769.91	ME01	\$153,238.92
PN01	\$39,351.63	\$3,279.30	\$131,400.31	\$10,950.03	\$170,751.94	\$14,229.33	PN01	\$170,751.94
JC01	\$72,411.75	\$6,034.31	\$241,792.41	\$20,149.37	\$314,204.16	\$26,183.68	JC01	\$314,204.16
MP01	\$77,694.24	\$6,474.52	\$864,506.99	\$72,042.25	\$942,201.23	\$78,516.77	MP01	\$942,201.23
PE01	\$24,691.22	\$2,057.60	\$82,447.24	\$6,870.60	\$107,138.46	\$8,928.20	PE01	\$107,138.46
WP01	\$33,356.89	\$2,779.74	\$111,383.10	\$9,281.93	\$144,739.99	\$12,061.67	WP01	\$144,739.99
*1000	\$0.00	\$0.00	\$50,000.00	\$4,166.67	\$50,000.00	\$4,166.67	1000	\$50,000.00
Total	\$593,538.92	\$49,461.58	\$2,031,905.08	\$169,325.45	\$2,625,444.00	\$218,787.03	Total	\$2,625,444.00

* Monthly amounts post Generation Asset Swap

Edison Electric Institute
2013 Membership Dues
As allocated Pre Generation Asset Swap (Jan to Sept 2013)

2013 Membership Dues Breakdown		
Regular Activities EEI		\$2,336,767.00
22% Lobbying	\$514,088.74	
78% Trade Dues	\$1,822,678.26	
Industry Issues		\$233,677.00
34% Lobbying	\$79,450.18	
66% Trade Dues	\$154,226.82	
Mutual Assistance Program		\$5,000.00
100% Trade Dues	\$5,000.00	
FE Foundation made donation to Edison Foundation		\$50,000.00
100% Trade Dues	\$50,000.00	
*Do not Exclude for 2013		
Total		\$2,625,444.00
Lobbying	\$593,538.92	
Trade Dues	\$1,981,905.08	

Company Code	Alloc %
1200	3.04%
1101	39.55%
OE01	9.34%
CE01	4.91%
TE01	3.12%
PP01	1.41%
ME01	5.95%
PN01	6.63%
JC01	12.20%
MP01	4.07%
PE01	4.16%
WP01	5.62%
Total	100.00%

Company Code	Lobbying		Trade Dues		Total		Company Code	Amount
	Year Total	Per Month*	Year Total	Per Month*	Year Total	Per Month*		
1200	\$18,043.58	\$1,503.63	\$60,249.91	\$5,020.83	\$78,293.49	\$6,524.46	1200	\$78,293.49
1101	\$234,744.64	\$19,562.05	\$783,843.46	\$65,320.29	\$1,018,588.10	\$84,882.34	1101	\$1,018,588.10
OE01	\$55,436.54	\$4,619.71	\$185,109.93	\$15,425.83	\$240,546.47	\$20,045.54	OE01	\$240,546.47
CE01	\$29,142.76	\$2,428.56	\$97,311.54	\$8,109.30	\$126,454.30	\$10,537.86	CE01	\$126,454.30
TE01	\$18,518.41	\$1,543.20	\$61,835.44	\$5,152.95	\$80,353.85	\$6,696.15	TE01	\$80,353.85
PP01	\$8,368.90	\$697.41	\$27,944.86	\$2,328.74	\$36,313.76	\$3,026.15	PP01	\$36,313.76
ME01	\$35,315.57	\$2,942.96	\$117,923.35	\$9,826.95	\$153,238.92	\$12,769.91	ME01	\$153,238.92
PN01	\$39,351.63	\$3,279.30	\$131,400.31	\$10,950.03	\$170,751.94	\$14,229.33	PN01	\$170,751.94
JC01	\$72,411.75	\$6,034.31	\$241,792.41	\$20,149.37	\$314,204.16	\$26,183.68	JC01	\$314,204.16
MP01	\$24,157.03	\$2,013.09	\$80,663.53	\$6,721.96	\$104,820.56	\$8,735.05	MP01	\$104,820.56
PE01	\$24,691.22	\$2,057.60	\$82,447.24	\$6,870.60	\$107,138.46	\$8,928.20	PE01	\$107,138.46
WP01	\$33,356.89	\$2,779.74	\$111,383.10	\$9,281.93	\$144,739.99	\$12,061.67	WP01	\$144,739.99
*1000	\$0.00	\$0.00	\$50,000.00	\$4,166.67	\$50,000.00	\$4,166.67	1000	\$50,000.00
Total	\$593,538.92	\$49,461.58	\$2,031,905.08	\$169,325.45	\$2,625,444.00	\$218,787.03	Total	\$2,625,444.00

* Monthly amounts pre Generation Asset Swap

Edison Electric Institute
2012 Membership Dues

2012 Membership Dues Breakdown		
Regular Activities EEI		\$2,281,334.00
26% Lobbying	\$593,146.84	
74% Trade Dues	\$1,688,187.16	
Industry Issues		\$228,133.00
36% Lobbying	\$82,127.88	
64% Trade Dues	\$146,005.12	
Mutual Assistance Program		\$5,000.00
100% Trade Dues	\$5,000.00	
FE Foundation made donation to Edison Foundation		
100% Trade Dues - Exclude	\$30,000.00	
Do not amortize - per D. Valentine		
Total		\$2,514,467.00
Lobbying	\$675,274.72	
Trade Dues	\$1,839,192.28	

Company Code	Alloc %
1200	0.55%
1101	42.37%
OE01	9.04%
CE01	6.59%
TE01	3.04%
PP01	1.00%
ME01	7.29%
PN01	6.44%
JC01	12.28%
MP01	3.39%
PE01	3.23%
WP01	4.78%
Total	100.00%

Company Code	Lobbying		Trade Dues		Total		Company Code	Amount
	Year Total	Per Month	Year Total	Per Month	Year Total	Per Month		
1200	\$3,714.01	\$309.50	\$10,115.56	\$842.96	\$13,829.57	\$1,152.46	1200	\$13,829.57
1101	\$286,113.90	\$23,842.83	\$779,265.77	\$64,938.81	\$1,065,379.67	\$88,781.64	1101	\$1,065,379.67
OE01	\$61,044.83	\$5,087.07	\$166,262.98	\$13,855.25	\$227,307.81	\$18,942.32	OE01	\$227,307.81
CE01	\$44,500.60	\$3,708.38	\$121,202.77	\$10,100.23	\$165,703.37	\$13,808.61	CE01	\$165,703.37
TE01	\$20,528.35	\$1,710.70	\$55,911.45	\$4,659.29	\$76,439.80	\$6,369.99	TE01	\$76,439.80
PP01	\$6,752.75	\$562.73	\$18,391.92	\$1,532.66	\$25,144.67	\$2,095.39	PP01	\$25,144.67
ME01	\$49,227.53	\$4,102.29	\$134,077.12	\$11,173.09	\$183,304.65	\$15,275.38	ME01	\$183,304.65
PN01	\$43,487.69	\$3,623.97	\$118,443.98	\$9,870.33	\$161,931.67	\$13,494.30	PN01	\$161,931.67
JC01	\$82,923.74	\$6,910.31	\$225,852.80	\$18,821.07	\$308,776.54	\$25,731.38	JC01	\$308,776.54
MP01	\$22,891.81	\$1,907.65	\$62,348.61	\$5,195.72	\$85,240.42	\$7,103.37	MP01	\$85,240.42
PE01	\$21,811.37	\$1,817.61	\$59,405.90	\$4,950.49	\$81,217.27	\$6,768.10	PE01	\$81,217.27
WP01	\$32,278.14	\$2,689.85	\$87,913.42	\$7,326.12	\$120,191.56	\$10,015.97	WP01	\$120,191.56
*1000	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	1000	\$0.00
Total	\$675,274.72	\$56,272.89	\$1,839,192.28	\$153,266.02	\$2,514,467.00	\$209,538.91	Total	\$2,514,467.00

* Do not allocate to Operating Companies or to Generation.

Edison Electric Institute
 2011 Membership Dues
 As allocated Post FE-AYE Merger (Mar to Dec 2011)

2011 Membership Dues Breakdown		Annual Dues
Regular Activities EEI		\$853,048.00
21% Lobbying	\$179,140.08	
79% Trade Dues	\$673,907.92	
Industry Issues		\$85,305.00
35% Lobbying	\$29,856.75	
65% Trade Dues	\$55,448.25	
Mutual Assistance Program		\$5,000.00
100% Trade Dues	\$5,000.00	
Contribution to Edison Foundation		\$30,000.00
	\$30,000.00	
Total		\$973,353.00
Lobbying	\$208,996.83	
Trade Dues	\$734,356.17	

POST MERGER - Allocations effective 3/1/2011		
Company Code	Lobbying Alloc %	Trade Dues Alloc %
FENOC	0.12%	0.10%
FE Generation	12.43%	10.37%
Ohio Edison	8.89%	7.42%
CEI	6.63%	5.53%
Toledo Edison	3.10%	2.59%
Penn Power	1.16%	0.97%
Met Ed	7.12%	5.94%
Pennelec	6.44%	5.38%
JCP&L	12.52%	10.45%
Mon Power	6.75%	9.87%
Potomac Edison	3.61%	5.25%
West Penn	5.26%	7.50%
AE Supply	8.66%	12.45%
PATH	0.16%	0.48%
Trail	0.79%	2.05%
FE Solutions	1.50%	1.25%
FE Nuclear Gen	11.55%	9.64%
ATSI	3.31%	2.76%
Total	100.00%	100.00%

Company Code	Lobbying		Trade Dues		Total		Company Code	Amount
	Year Total	Per Month *	Year Total	Per Month *	Year Total	Per Month *		
FENOC	\$250.80	\$20.90	\$734.36	\$61.20	\$985.16	\$82.10	1200	\$985.16
FE Generation	\$25,978.31	\$2,164.86	\$76,152.73	\$6,346.06	\$102,131.04	\$8,510.92	1101	\$102,131.04
Ohio Edison	\$18,579.82	\$1,548.32	\$54,489.23	\$4,540.77	\$73,069.05	\$6,089.09	OE01	\$73,069.05
CEI	\$13,856.49	\$1,154.71	\$40,609.90	\$3,384.16	\$54,466.39	\$4,538.87	CE01	\$54,466.39
Toledo Edison	\$6,478.90	\$539.91	\$19,019.82	\$1,584.99	\$25,498.72	\$2,124.90	TE01	\$25,498.72
Penn Power	\$2,424.36	\$202.03	\$7,123.25	\$593.60	\$9,547.61	\$795.63	PP01	\$9,547.61
Met Ed	\$14,880.57	\$1,240.05	\$43,620.76	\$3,635.06	\$58,501.33	\$4,875.11	ME01	\$58,501.33
Pennelec	\$13,459.40	\$1,121.62	\$39,508.36	\$3,292.36	\$52,967.76	\$4,413.98	PN01	\$52,967.76
JCP&L	\$26,166.40	\$2,180.53	\$76,740.21	\$6,395.02	\$102,906.61	\$8,575.55	JCO1	\$102,906.61
Mon Power	\$14,107.29	\$1,175.61	\$72,480.94	\$6,040.08	\$86,588.23	\$7,215.69	MP01	\$86,588.23
Potomac Edison	\$7,544.79	\$628.73	\$38,553.69	\$3,212.81	\$46,098.48	\$3,841.54	PE01	\$46,098.48
West Penn	\$10,993.23	\$916.10	\$55,076.74	\$4,589.73	\$66,069.97	\$5,505.83	WP01	\$66,069.97
AE Supply	\$18,099.13	\$1,508.26	\$91,427.37	\$7,618.95	\$109,526.50	\$9,127.21	AE Supply	\$109,526.50
PATH	\$334.39	\$27.87	\$3,524.94	\$293.75	\$3,859.33	\$321.62	PATH	\$3,859.33
Trail	\$1,651.07	\$137.59	\$15,054.33	\$1,254.53	\$16,705.40	\$1,392.12	Trail	\$16,705.40
FE Solutions	\$3,134.95	\$261.25	\$9,179.48	\$764.96	\$12,314.43	\$1,026.21	FE Solutions	\$12,314.43
FE Nuclear Gen	\$24,139.13	\$2,011.59	\$70,791.96	\$5,899.33	\$94,931.09	\$7,910.92	FE Nuclear Gen	\$94,931.09
ATSI	\$6,917.80	\$576.48	\$20,268.26	\$1,689.02	\$27,186.06	\$2,265.50	ATSI	\$27,186.06
*1000	\$0.00	\$0.00	\$30,000.00	\$2,500.00	\$30,000.00	\$2,500.00	1000	\$30,000.00
Total	\$208,996.83	\$17,416.40	\$764,356.33	\$63,696.38	\$973,353.16	\$81,112.78	Total	\$ 973,353.16

* Monthly amounts for March through December 2011.

Edison Electric Institute
 2011 Membership Dues
 As allocated Pre FE-AYE Merger (Jan to Feb 2011)

2011 Membership Dues Breakdown		Annual Dues
Regular Activities EEI		\$853,048.00
21% Lobbying	\$179,140.08	
79% Trade Dues	\$673,907.92	
Industry Issues		\$85,305.00
35% Lobbying	\$29,856.75	
65% Trade Dues	\$55,448.25	
Mutual Assistance Program		\$5,000.00
100% Trade Dues	\$5,000.00	
Contribution to Edison Foundation		\$30,000.00
	\$30,000.00	
Total		\$973,353.00
Lobbying	\$208,996.83	
Trade Dues	\$734,356.17	

POST MERGER - Allocations effective 1/1/2011

Company Code	Lobbying	Trade Dues
	Alloc %	Alloc %
Mon Power	25.60%	25.60%
Potomac Edison	13.51%	13.51%
West Penn	18.78%	18.78%
AE Supply	31.61%	31.61%
PATH	2.07%	2.07%
Trail	8.43%	8.43%
Total	100.00%	100.00%

Company Code	Lobbying		Trade Dues		Total		Company Code	Amount
	Year Total	Per Month *	Year Total	Per Month *	Year Total	Per Month *		
Mon Power	\$53,503.18	\$4,458.60	\$187,995.15	\$15,666.26	\$241,498.33	\$20,124.86	MP01	\$241,498.33
Potomac Edison	\$28,235.48	\$2,352.96	\$99,211.52	\$8,267.63	\$127,447.00	\$10,620.59	PE01	\$127,447.00
West Penn	\$39,249.61	\$3,270.80	\$137,912.13	\$11,492.68	\$177,161.74	\$14,763.48	WP01	\$177,161.74
AE Supply	\$66,063.90	\$5,505.33	\$232,130.03	\$19,344.17	\$298,193.93	\$24,849.50	AE Supply	\$298,193.93
PATH	\$4,326.23	\$360.52	\$15,201.20	\$1,266.77	\$19,527.43	\$1,627.29	PATH	\$19,527.43
Trail	\$17,618.43	\$1,468.20	\$61,906.25	\$5,158.85	\$79,524.68	\$6,627.05	Trail	\$79,524.68
*1000	\$0.00	\$0.00	\$30,000.00	\$2,500.00	\$30,000.00	\$2,500.00	1000	\$30,000.00
Total	\$208,996.83	\$17,416.40	\$764,356.28	\$63,696.36	\$973,353.11	\$81,112.76	Total	\$ 973,353.11

* Monthly amounts pre-merger, January and February 2011.