Metropolitan Edison Company;
Docket No. M-2013-2341990

Pennsylvania Electric Company;
Docket No. M-2013-2341994

Pennsylvania Power Company;
Docket No. M-2013-2341993

West Penn Power Company;
Docket No. M-2013-2341991

FirstEnergy Companies

FirstEnergy's Pennsylvania Utilities Smart Meter Communications Plan

May 6, 2014

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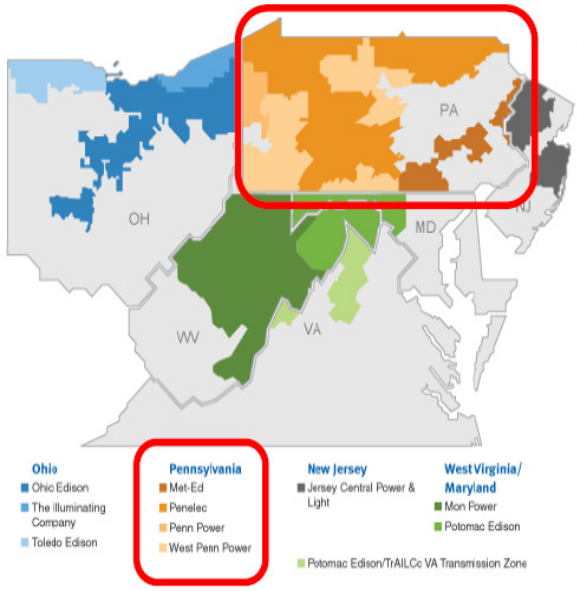
EXECUTIVE SUMMARY

Under Pennsylvania Act 129, electric utility companies are required to deploy smart meter technology by 2025, with all utilities providing smart meters in new construction and to all residential, commercial and industrial customers who request them starting in 2013. FirstEnergy's Pennsylvania utilities – Metropolitan Edison Company (Met-Ed), Pennsylvania Electric Company (Penelec), Pennsylvania Power Company (Penn Power) and West Penn Power Company (West Penn) (called the Companies) – serve approximately two million customers in the Commonwealth of Pennsylvania. The estimated number of meters to be installed by each of the Companies is shown below.



Customer Class	Projected Average Customer Class Count For the Twelve Months Ending December 31, 2013			
	Met-Ed	Penelec	Penn Power	West Penn
Residential	489,495	501,138	140,393	619,826
Commercial	65,082	81,078	18,987	93,309
Industrial	832	866	151	2,744
Total	555,409	583,583	159,531	715,879

FirstEnergy Pennsylvania Service Territories

The Companies will also develop the infrastructure necessary to support the meters, including a unified network platform to interconnect all of the new devices. (See Appendix for a diagram of the devices) These meters and related equipment will be installed in three stages which may overlap:

1. Post-grace period stage (2013-2022)
2. Solution validation stage (2014-2015)
3. Full scale deployment stage (2016-2022)

The Companies' deployment strategy is a multi-year, complex process that will generate significant interest by customers, employees, government officials, potential electric

suppliers and others. In order to ensure that timely and accurate information is disseminated, the Companies have developed this Smart Meter Customer Communications Plan (hereinafter called "the Plan"). The Plan is designed to correspond with the timing of the Companies' Deployment Plan, the success of which depends in large part on the effectiveness of the Companies' customer outreach, education and communication efforts.

Stage 1: 2013-2022 – Post-Grace Period Stage

- Smart meter deployment for special circumstances
- Limited functionality
- Installations based on customer requests and on new construction (regardless of location)
- Engage the collaborative on communications issues

Stage 2: 2014-2015 – Solution Validation Stage

- Ramp-up period
- Goal is to install approximately 170,000 meters in Penn Power's territory
- Gather customer feedback and continue to refine messaging

Stage 3: 2016-2022 – Full Scale Deployment Stage

- Mass deployment
- Install 98.5% of meters by mid-2019; 100% by 2022
- Execute refined communications plan

While all of the smart meters will have all of the *capabilities* required by either Act 129 or the Pennsylvania Public Utility Commission (hereinafter called "the Commission"), the Companies anticipate a phasing in of meter *functionality* over time. The Companies' will communicate this functionality to customers, and will evolve their messaging as greater functionality is implemented.

It is important to note that although this Plan anticipates many of the potential issues that may arise, there is no way to definitively predict all the information that the various interest groups will require. Therefore, a primary goal when designing this Plan was to incorporate flexibility that will allow the Companies to change messaging as conditions warrant, which means the Plan may need to be modified as the overall Deployment Plan is implemented.

In an effort to gather information and leverage the expertise of interested stakeholders, the Companies vetted the Plan with these stakeholders, in order to develop a well-reasoned, comprehensive plan to communicate to all of the groups affected by the smart meter deployment. As the Plan is implemented, the Companies will continue to discuss communications issues with the appropriate parties whose constituencies are affected by this deployment.

Plan Objectives

The objectives of the Plan are to:

1. Provide communications in a manner that minimizes customer confusion by anticipating customer concerns and questions
2. Provide communications in a cost-effective manner
3. Develop and deliver consistent and effective messages that coincide with the Companies' smart meter implementation plan and deployment schedule
4. Keep employees, government officials, regulators and media informed of significant developments
5. Develop communications that are properly targeted to applicable interest groups
6. Develop a process to identify issues in the marketplace and provide timely responses through effective communications
7. Continue to develop communications to customers, employees and other stakeholders throughout the smart meter deployment program as major milestones are achieved
8. Inform third party generation suppliers throughout the lifecycle of the program
9. Seek feedback from affected parties and integrate that feedback into future communications
10. Develop messages that properly balance "the need to know" with the need for customer security and privacy

Overarching Key Messages

Throughout the implementation of the Plan, the Companies will use the Plan Objectives to develop key messages that will help raise customer awareness of smart meters, based on the following themes:

- Smart meter technologies will provide customers with additional electric usage information that should allow them to better manage their electricity consumption.
- Smart meters are capable of measuring electricity usage in greater detail and communicating that information to customers and their selected electric service provider.
- Over time, smart meters will enable customers in their own home or business to view detailed information on their electricity usage either directly from the meter or through a secure website.
- While there will be up-front costs related to deployment, there can potentially be long-term benefits to customers and the Companies.
- Inform customers with smart meters about available programs, such as time of use (TOU) pricing that may become available from the Companies or an alternative generation supplier.

Communications Challenges

During the development of the smart meter Deployment Plan, the following communications challenges were identified:

- Improving customer understanding of smart meters and awareness of the Companies' implementation plan.
- Educating government officials and the media on issues involving smart metering.
- Managing customer expectations for smart meter functionality and potential benefits.
- Communicating with lower-income, vulnerable and elderly customers as well as those who may have concerns regarding the costs related to smart meters and the potential benefits that can be realized.
- Effectively addressing frequently asked customer questions and concerns.
- Addressing and correcting the various misunderstandings surrounding smart metering.

The above challenges must be addressed in order to fully achieve the Plan Objectives previously outlined. It is essential to effectively build customer awareness around smart meter technology, offer accurate expectations of smart meter capabilities and share Deployment Plan specifics to facilitate a smooth deployment process.

Key Issues

The Companies will produce customer communications materials addressing key issues, regarding their smart meter program, including but not limited to:

- **Radio Frequency (RF) Emissions:** As smart meters emit low levels of electro-magnetic radiation through their RF communications, the Companies will address, educate, and aim to alleviate concerns around unfounded potential health impacts and interference with other wireless devices.
- **Privacy:** Smart meters can be viewed by some as an invasive technology that provides the utility, and possibly others, with proprietary information regarding when customers are home, when they are away, and when they use basic appliances. The Companies take the privacy of their customer data very seriously and will work with targeted groups to minimize privacy concerns.
- **Security**: The Companies take security very seriously and comply with all local, state and federal regulations to protect their customers' personal data and information. All customer information, including personal information, bill payment type or status, and utility use are strictly protected. The security of this data must be maintained during data collection, transfer and storage.

- **Cost:** The costs of smart meter technologies are significant and, by Pennsylvania law, customers are required to pay for the costs of smart meter programs in Pennsylvania. The Companies will exercise fiscal responsibility and will ensure transparency of cost reporting.
- **Accuracy:** The Companies will address concerns regarding the measurement accuracy of smart meters. Historically, analog meter components sometimes exhibit the effects of wear over their service lives, causing meter lagging and thus impacting the accuracy of the consumption measurement with a lower measurement. After a smart meter is installed, the return to accurate readings for those affected locations is realized, and the customer may perceive erroneous readings.
- **Deployment Expectations:** The Companies will keep customers aware of how to identify Company employees during deployment, when Company employees are in their neighborhoods and when they leave the customer premise.

Key Audiences

The Companies will be consistent in its messaging as it targets its various audiences, which includes:

- Customers
  - Early Adopters
  - Low Income Customers
  - Elderly
  - Special Needs and other vulnerable customers
- Employees and Unions
- Government Officials
- Regulators
- Generation Suppliers
- Consumer Advocates
- News Media
- Key community Leaders
- Investment Community
- Competitive Electric Suppliers

Communication Outreach

The Companies will utilize direct customer communication, community outreach and media relations to engage and connect with target audiences. This outreach may include some of the various tactics listed below:

- News releases
- Fact sheets, talking points and brochures outlining key messages distributed to call centers and other personnel who are in contact with the public
- Customer mailings detailing the program and important key milestones

- FirstEnergy's external website (www.firstenergycorp.com)
- Media contacts
- Newspaper advertisements
- Speakers Bureau presentations to local community groups
- Social media
- Other appropriate communication channels, including those that will reach low-income, elderly and otherwise vulnerable customers

Audience Demographics

The Companies' service area is expansive and includes a diverse audience. As a result, communications will be developed with the Companies' customer diversity, in terms of education level, income and age, in mind. A more detailed look at customer demographics can be found in the Appendix.

Risk Mitigation Plan

As part of the Plan, the Companies developed a strategy to anticipate, quickly respond to and manage situations that could arise during Deployment through the development of a special team – comprised of FirstEnergy's communications, customer contact and smart meter teams – trained in dealing with smart meter related issues. This team will draw on best practices and lessons learned by utilities across the country in an attempt to minimize customer issues by (1) remaining proactive, (2) internally prioritizing communications and response activities as problems are identified, and (3) tracking problems individually and sorting them into groups of similar issues. This aspect of the Plan is described in more detail in the Risk Mitigation Plan section.

Budget

The Companies estimated the costs associated with planning and implementing the proposed Plan. The proposed budget includes both internal and external resources and support and is based on proposed spending by calendar year.

The total communications budget is estimated to be $19 million for Stage 1 through Stage 3, with the following breakdown:

- For 2013, an annual budget of approximately $1 million.
- For 2014, an annual budget of approximately $1.25 million.
- For 2015, an annual budget of approximately $2 million.
- For the period 2016-2018, an annual budget of approximately $2.75 million per year.
- For 2019, an annual budget of approximately $2.5 million.
- For 2020, an annual budget of approximately $2 million.
- For the period 2021-2022, approximately $1 million per year.

This Plan budget includes funding for Legal, Regulatory Consulting, Corporate Communications and all media initiatives. The budget for the Plan is described in more detail in the Budget Section.

STAGE 1 - Post-Grace Period Stage

January 2013 – December 2022

The Companies anticipate limited "ad hoc" installations of smart meters during this period, providing them only in new construction and upon specific requests by customers. In the early years of Stage 1 (before the overlapping Stage 2 begins), the Companies are primarily supporting design and IT build out. Therefore, communications will be limited to providing high-level messaging that will address matters, such as meter deployment schedules, status updates on the implementation of the Deployment Plan as approved by the Commission, common links for additional information on various smart meter issues, and targeting information for early adopters – which provides more details on the use of their new smart meter. Except for early adopter information, which will be provided predominantly through mailings to specific individual customers, it is expected that the remaining information will be provided through the FirstEnergy website, using FAQs, fact sheets and other appropriate communications tools.

Objectives

- Develop consistent and effective messages to customers interested in the Companies' smart meter program, providing a high-level explanation for why the Companies are installing smart meters.
- Deliver a clear set of expectations to customers about smart meter functionality and benefits.
- Provide basic information and updates to FirstEnergy employees about smart meters so they are able to respond to customer questions and concerns.
- Be responsive in providing communications to customers; local, state and federal officials; and the media to address questions or concerns about the program.
- Inform customers with smart meters about available programs, such as time of use (TOU) pricing.
- Correct any misinformation about smart meters – such as health, accuracy, privacy issues, etc.

Key Messages

- Smart meters are available upon request and on new construction beginning January 2013.
- The Companies are investing in smart meters and associated infrastructure as required by Act 129 and as ordered by the Commission. This will modernize the metering infrastructure, provide customers and the Companies with more detailed information about electricity usage and, ultimately may help provide customers with more opportunities to reduce electricity usage and costs in the long-term.

- The Companies will train and educate selected employees in the Customer Contact Center team to be knowledgeable about smart meters to respond to questions that arise early in the deployment or by early adopters, including questions and concerns regarding health, accuracy and privacy issues.
- Although smart meters can help customers have greater control of their electricity usage so they can make more informed usage decisions, during this time the Companies will be designing the technology solution and implementing a unified network platform. Features and programs will be phased in over time. (All early adopters will have access to the Home Energy Analyzer during Stage 1.)
- As the software and infrastructure is more fully implemented, functionality of the smart meters will expand and will provide more detailed information concerning electricity usage.
- Early adopting customers who request a meter during Stage 1 can expect the following:
    - Fee of approximately $340-380 for a single phase point-to-point smart meter, OR
    - Fee of approximately $450-475 for a three phase point-to-point smart meter (a smart meter device with functionality)
    - Data will be available between 24-48 hours after new meter installation
- Customers with meter installs for new construction will receive mesh meters with NO added functionality until full deployment in their operating company occurs.
- The Companies ensure that each smart meter installed is tested for accuracy by following standards set by the American National Standards Institute (ANSI).
- The Companies comply with current guidelines issued by the National Institute of Standards & Technology (NIST) regarding smart meter information security.

Challenges

During this first stage of the Plan, when initial meter installations are occurring for early adopters and new home/commercial building construction, identified challenges that must be addressed include:

- Addressing customer concerns about the smart meter's cost of installation, metering accuracy, data security and RF emissions health impacts
- Different levels of awareness and expectations about smart meters
- Setting customer expectations for the timeline and functionality of the meters
- Variation in the Companies' Deployment Plans and timelines compared to other utilities in the state
- Ongoing discussion about costs associated with installation and how they are calculated for ratepayers

Plan Components

Internal Tactics

The goal of the internal tactics is to provide the Companies' employees with training, consistent messaging and ongoing feedback opportunities to effectively anticipate and respond to customer questions and concerns with regard to smart meter deployment. These internal tactics are consistent with best practices developed by other utilities across the country.

The Companies must adjust the mix of skills in its workforce for smart metering technologies and processes. Job responsibilities will change, and in some cases, roles will be eliminated. Change management is a structured approach to transitioning people, processes and systems from a current state to a desired future state. The objectives of change management are to minimize the extent of the disruption inherent in change, to promote understanding and commitment and build the foundation for heightened levels of sustained performance. (See Appendix for Change Management Plan overview.)

The challenges of change management are resolved throughout the smart meter training process. To address these challenges, the Companies have outlined a training strategy, designed to mitigate potential knowledge and skill gaps throughout the deployment. The primary objective of the training courses and communication materials will be to provide timely, accurate and consistent smart meter technology training, as needed, to all team members and impacted groups in a way that builds not only awareness and understanding, but also commitment to the program's success. The key objectives of this process are to identify key role changes due to the installation of smart meter technology and the impacts on required skills, knowledge and abilities for key jobs. Coordination with business leadership, Human Resources, and Labor Relations to understand and successfully accomplish these objectives will be crucial. (See Appendix for Training Plan overview.)

Talking Points and FAQs for Employees: Documents outlining the Companies' key messages and background information along with frequently asked questions will be distributed to External Communications, State, Local and Federal Affairs, Customer Support, Customer Contact Centers, meter readers and other company employees in direct contact with customers. (See the Appendix for example.) These materials will enable employees to address the most frequently asked questions which have arisen in other markets during smart meter implementation. In addition, employees will be able to direct customers to resources such as the FirstEnergy website in order to access additional information regarding smart meters.

Customer Contact Center Training: Select Customer Contact Center personnel will be trained and equipped with more detailed information so they are able to respond to smart meter related customer inquiries and concerns that are specifically routed to them. Customer Contact Center representatives will be able to record feedback and comments

from customers. Training for these representatives will include best practices based on experiences from other utilities.

External Tactics

The goal of these external tactics is to manage external expectations and define high-level plans. Regular and consistent updates to educate customers about the Commission-mandated smart meter implementation will occur through 2022. Since most customers will not yet be receiving a smart meter, communications will generally be designed to educate customers and set expectations through the use of FirstEnergy's website prior to smart meter installation. For customers without access to the Internet, printed information will be mailed to customers when they call the Customer Contact Center. Communications for those early adopter customers who receive meters during Stage 1 will be designed to set expectations on meter functionality.

Early Adopter Welcome Letter: Early adopters will receive a welcome letter following the Companies' receipt of the smart meter fee prior to scheduled installations. This letter will provide the customer receiving the smart meter with information about the technology, timing, functionality and potential benefits. In addition, the letter will detail the installation process, including specifics about the installation contractors, meter vendors and contact information for an installation appointment if the meters are located inside the home. The letter will also reference the FirstEnergy website as a resource for more information. Early adopters will have access to their usage data via the Home Energy Analyzer, which is accessible via the FirstEnergy website, within 24-48 hours after meter installation.

FirstEnergy's Website: The FirstEnergy website will include a smart meter section that includes a range of resources, including smart meter fact sheets, FAQs, detailed information about smart meter availability, and an anticipated rollout timeline in the Companies' service areas.

Fact Sheets: Available on the website will be fact sheets that address topics of concern and interest regarding smart meters, such as RF emissions health impacts, data privacy, data security, etc. The Companies' employees will also have printed fact sheets available to share and mail to customers should questions arise during their interactions with customers. (See the Appendix for a sample fact sheet.).

FAQs: Customers will also be able to access the FAQs on the FirstEnergy website. This resource is designed to concisely answer the most commonly asked questions from customers with regard to smart meters, such as privacy of information, costs and health impact of RF emissions.

Customer Contact Center: The Customer Contact Center will be training a core group of employees and equipping them with the information and resources required to anticipate

and respond to customer inquiries about smart meters. A technical team will also be established to assist with more complex questions. This will allow the Companies to refine their processes and anticipate the customer needs and expectations for the next stages.

Interact with Affected Stakeholder Groups:
The Companies will gather feedback from various stakeholder groups, as conditions warrant, in order to effectively communicate and address issues specific to these groups.

STAGE 2 - Solution Validation Stage

2014 – 2015

The ramp-up period for full scale smart meter deployment is scheduled to begin in 2014 with the Solution Validation Stage that will ultimately install approximately 170,000 smart meters and the enabling infrastructure in the Penn Power service territory by the end of 2015. The Companies will test and validate smart meters and the enabling communications network by installing and evaluating a complete "end-to-end" system in the Penn Power service territory. The Companies will use this opportunity to substantiate the messaging and communications strategies listed in the Full Deployment Plan and will seek feedback from various interested groups in order to refine the Plan for full deployment in Stage 3.

Objectives

- Actively inform and prepare customers in the target installation area about smart meter installation at their home or business according to order of installation.
- Help customers understand the installation process and have easy access to quick and accurate answers to their questions.
- Educate customers who have received a smart meter about the increased capabilities of existing and newly installed smart meters, and how to maximize the potential value of these new meter-related capabilities.
- Manage customer expectations, being mindful to qualify the potential benefits of smart meters.
- Follow a comprehensive risk mitigating communication plan that anticipates customer issues and enables timely responses.
- Refine communications and educational materials based on customer feedback received in Penn Power's service area.

Key Messages

In the time period directly prior to installation of their smart meter, customers will have access to, and target installation areas will receive, more detailed information about the implementation plan and timeline. Key messaging during this stage will include the following:

- The Companies are installing smart meters throughout their Pennsylvania service territories, as mandated by Pennsylvania's Act 129.
    - The project is funded through a smart meter rider approved by the Commission as mandated by Pennsylvania Act 129.
    - There is no provision in Act 129 for customers to opt out of the smart meter program.
- Smart meters will replace all analog meters, which currently measure electricity usage.

- Smart meter technology has been rigorously tested by manufacturers and implemented throughout the country, and is safe to be incorporated into the Companies' electric infrastructure.
- Installations have already begun for early adopters and new construction, and smart meters are now being deployed systematically for all Penn Power customers.
- The 170,000 meter installations in the Penn Power service territory will be scheduled by defined geographic areas and will be performed by FirstEnergy employees or contractors who will be required to display proper identification.
- Meter functionality will increase over time as the infrastructure is fully implemented and as new features are enabled.
- Customers will be made aware of any available programs that can supply them with more detailed usage information which they can then use to better manage their energy use.
- Keeping in mind that some customers may not want to use their smart meter's functionality, the Companies will explain that customers can treat this meter as they did their previous meter and do not have to interact with it

Challenges

Many challenges expected during Stage 2 are continuing challenges from Stage 1, and additional challenges will emerge as meters are deployed at a higher rate and in higher volumes. These challenges include:

- Building customer awareness of the smart meter rollout, including awareness and expectations of the installation process and identifying installation personnel.
- Effectively addressing customer questions and concerns prior to installation.
- Addressing specific concerns for businesses and vulnerable customers.
- Managing customers who refuse smart meter installation by explaining that it is mandated by Pennsylvania law.
- Fielding common customer claims about smart meters after installation, including perceived billing errors, data privacy and security.
- Guide customers to leverage available prepared information and resources when they have questions, such as the information available on the FirstEnergy website.
- Communicating to customers in a phased approach based on the actual smart meter deployment schedule.

Plan Components

In addition to the tactics outlined in Stage 1, the Companies will expand their internal and external-facing communications outreach through the following measures:

Internal Tactics

The goal of the internal tactics remain the same – to provide the Companies' employees with on-going training, consistent messaging and on-going feedback opportunities to effectively anticipate and respond to customer questions and concerns with regard to smart meter implementation. These will include the same tactics from Stage 1, expanded to a larger group of employees in Stage 2 to address the larger number of customers who will be impacted. As described in Stage 1, these tactics are:

- **Refined talking points and FAQs for the Companies' Employees** – Based on the feedback on the reference documents that were provided for the Companies' employees in Stage 1, these tools may be refined or expanded upon for Stage 2.
- **Customer Contact Center Training** – More Customer Contact Center personnel will be trained during this stage to respond to customer inquiries and concerns regarding smart meters, and additional training or information may be provided as information or the deployment schedule changes.

External Tactics

During Stage 2, the proposed external tactics described in the following sections will be implemented and reviewed for effectiveness in addressing the customers' needs, to be updated and finalized for Stage 3, the Full Scale Mass Deployment.

The Companies will work to communicate with communities and customers proactively in order to better manage expectations before, during and after the customer smart meter is installed. The strategy includes 3 segments of notification, as outlined in the following table:

1. **90-60-30 Day Pre-Installation**: Tactics and notifications designed to prepare and equip the community, customers, stakeholders and employees leading up to the install of customers' smart meter at approximately 90, 60 and 30 days prior to the installation of smart meters.
2. **Installation Day:** Tactics and notifications designed to prepare customers for what to expect the day their smart meter will be installed.
3. **Post-Installation**: Tactics and notifications designed to inform customers about tools and updates available on the FirstEnergy website or through third-party suppliers.

90-60-30 Pre-Installation, Installation Day and Post-Installation Notification Strategy

FirstEnergy Notification Strategy	Proposed Notification Tactic	Estimated Timeline
Pre-Installation	Stakeholder Outreach	90 days prior
	Speakers Bureau Presentation	90 days prior
	Meetings w/Elected Officials & Government Agencies	90 days prior
	FirstEnergy Website	90 days prior
	Media Outreach	60 days prior
	Digital & Social Media	60 days prior
	Advertising	30 days prior
	Direct Mail	30 days prior
	Targeted Customer Mail	Less than 30 days prior
	Appointment Scheduling	Less than 30 days prior as needed
	Call Customer via IVR	Less than 30 days prior
Installation Day	Knock on the Door	Installation Day
	Install the Smart Meter	Installation Day
	Door Hanger	Installation Day
	Media outreach, as appropriate	Installation Day
Post-Installation	Access to Customer Tools and Programs	24-48 hours after installation for meter data
	Customer Monthly Bill Support	Monday-Friday
	Media outreach, as appropriate	As necessary

90-60-30 Day Pre-Installation:

During this period, the Companies will make efforts to educate and inform customers, the communities and the media of the upcoming smart meter installation in their area. These efforts include communicating specific messages using various communications channels 90 days prior, 60 days prior and 30 days prior to actual installation. This effort may include some of the following proposed tactics: briefings with local public officials and community leaders; media outreach; customer mailings; Speaker's Bureau presentations to community groups; and use of Call Center Interactive Voice Response (IVR) messages to customers. Key features of this pre-installation effort may include:

Media Education: Early in the outreach effort, the Companies will begin to contact the media to alert them to the start of smart meter installations and to provide information on the program, including fact sheets, FAQs and detailed program implementation plans and a timeline, which are available on the FirstEnergy website.

News Releases: Updates on the progress of smart meter installations may be sent to the media throughout the outreach effort, along with releases noting new website features available for customers.

Stakeholder Outreach: The Companies will reach out to community leaders and public officials to enlist their help in communicating key messages. Communication and conversation will be in two directions, allowing for customer feedback to be incorporated into future communications and into the Deployment Plan.

Speaker's Bureau Presentations: A presentation about the smart meter program will be available to various groups and organizations in the community through the Companies Speaker's Bureau.

Meetings with Elected Officials and Government Agencies: The Companies will conduct phone calls to proactively address constituent concerns, receive feedback and answering any questions. The Companies may also deliver an information kit and provide contact information to government officials so that these officials may contact the utilities when they have additional questions.

Media Outreach: Targeted advertising for the community may be purchased and included in newspapers, as appropriate. The Companies will strive to work with the media to communicate and set realistic goals for the functionality of the smart meters and the timeline of implementation of more advanced features. Other objectives of the media outreach are to communicate the smart meter plan through multiple media mediums, establish awareness and understanding among consumers about how smart meters will be able to help them better manage their energy use.

FirstEnergy Website: Building on existing website resources, the Companies' smart meter section will be updated with resources that will prove useful as more and more communities get smart meters. A deployment schedule will be posted on the website so that customers and competitive electric suppliers have ready access to the information. The schedule will not include dates more specific than identification of the borough, township or city where deployment is scheduled "within the next sixty days." This website will also be updated periodically to confirm areas where deployment has been completed as well as when meters will be fully functional so that suppliers are able to offer pricing products tailored for customers with smart meters.

Social Media: The Companies will monitor social media for discussions on smart meters in the communities where meters are being installed and may leverage social media outlets to disseminate messaging to customers.

Targeted Outreach Efforts: The Companies will reach out to populations that may otherwise be difficult to reach, including vulnerable and low-income customers, using

various means – such as utilizing direct mail and making informational handouts available at intake agencies and to WARM Program contractors–or as appropriate under the circumstances. When applicable, the Companies will work with and seek input from various stakeholder groups in order to leverage already existing relationships with such groups.

Direct Mail: Brochures will be sent to customers informing them about the upcoming smart meter installation at their home or business. The brochures will include general information about the program and will direct customers to find more information on the FirstEnergy website.

Targeted Customer Mail: Approximately two weeks prior to a community's scheduled installation, customers will receive a letter with an estimated installation date as well as information about the meter. Customers will also receive contact information on how to contact the Companies to have any questions addressed. (See Appendix for a sample customer letter.)

Appointment Scheduling: The Companies will schedule appointments for customers on an as-needed basis. This includes appointments for customers who have meters that are indoors or otherwise inaccessible to installer.

Installation Day:

Initiate Contact with Customer: Either an employee or contractor displaying company credentials will knock at each customer's door the day that their smart meter will be installed. Customers will be notified of the meter exchange and the brief outage during the installation.

Installation of the Smart Meter: The Companies' employee or contractor will locate the existing analog meter and exchange it with a smart meter if it is readily accessible. If customer is home, the customer will then be notified when the installation is complete. If the analog meter is not accessible, the employee or contractor will work with the customer to gain access to the meter on that same day, or obtain customer contact information to schedule an appointment.

Door Hanger: If no one is home at the time of installation, a door hanger will be left indicating that a smart meter was successfully installed or that the customer will need to make an appointment. If an appointment is needed, contact information to schedule the appointment is provided. (See Appendix for a sample door hanger.).

Feedback: The Companies will actively solicit feedback from the meter installers to help refine communications and strategies accordingly.

Post-Installation:
Following installation of the smart meter, the Companies will make those customers aware of any smart meter-related programs being offered through the Companies and will encourage customers to research offers from third party suppliers offering products and services that will help them optimize the functionality of the smart meter.

Customer Monthly Bill Support: The Companies recognize that the initial months with a smart meter and extreme temperatures may cause fluctuations in the monthly bills that are not attributable to the smart meters themselves. As such, the Companies will train its Customer Contact Center employees to be able to troubleshoot and otherwise explain and manage these concerns from customers. Additionally, the Companies may provide information on the FirstEnergy website that explains what factors (such as extreme temperatures, changes in usage behavior and differing supplier costs) may contribute to a higher bill than expected.

Media Outreach After Installation: The Companies will continue to proactively contact and respond to any media inquiries to provide support of reporters and media outlets who wish to cover deployment progress.

STAGE 3 - Full Scale Deployment Stage

2016 – 2022

The Companies will conduct a full scale mass deployment of smart meters throughout their remaining three Pennsylvania service areas between 2016 and 2022 – 98.5% of the Companies' Pennsylvania customers are expected to have smart meters installed by mid-2019, and the remaining 1.5% of meters (in RF-challenged or remote areas) are targeted to be installed by the end of 2022. Stage 3 will be an extension of Stage 2 with modifications made based on lessons learned during Stage 2. Therefore, the general communications strategy as outlined in Stage 2 (90-60-30 Day Pre-Installation, Installation and Post Installation) will remain intact.

Objectives

- Continue to inform customers about upcoming meter installations.
- Develop messages that prepare communities and customers for smart meter installation at their home or business.
- Follow up with customers with new installations to inform them about any new tools or programs that may be available to them with their new smart meters.

Key Messages

In addition to messages outlined in Stage 2:

- Smart meters include advanced metering technology and have no moving parts. They are solid-state and fully digital, unlike traditional, analog meters.
- Targeted messaging to customers in radio frequency-challenged areas as to why they do not have a smart meter yet and when they can expect to receive one.
- Smart meters send information about electricity usage wirelessly on a secure network to you, your utility, and (with customer permission only) a designated third party.
- Educate interested customers about how to use the information available through the FirstEnergy Website.
- Encourage interested customers to research programs offered by third party suppliers that utilize smart meter technology.

Challenges

In addition to challenges outlined in Stage 2, the Companies note the following additional challenges in Stage 3:

- Reaching customers who are not online and who do not have readily available access to the website.

- Addressing the concerns of potentially larger numbers of customers who do not want a smart meter.
- Addressing customer expectations when external factors change the status quo, for example, seasonal rate changes.

Plan Components

In addition to tactics outlined in Stages 1 and 2 of the Plan, the Companies will also develop and implement the following methods to effectively communicate with customers:

Internal Tactics

These will include the same tactics from Stage 1 and 2, expanded to a larger group of employees in Stage 3 to address the larger number of customers who will be impacted. As described in Stage 1 and 2, these tactics are:

- **Refined talking points and FAQs for Companies' Employees** – Based on the feedback on the reference documents that were provided for the Companies' employees in Stage 2, these tools may be refined or expanded upon for Stage 3.
- **Customer Contact Center Training** – More Customer Contact Center personnel will be trained during this stage to respond to customer inquiries and concerns regarding smart meters, and additional training or information will be provided as information or the deployment schedule changes.

External Tactics

In addition to tactics outlined in Stages 1 and 2, the Companies may expand their communications outreach through the following proposed measures. The exact tactics to be used will be finalized based on feedback and experience gained during Stage 2 and customized to the needs of the community where the meters are being deployed:

Customer Bill Inserts and Messages: Customers may receive inserts in their monthly bills, which could periodically provide basic information regarding smart meters, featured articles addressing various topics related to smart meters and directing customers to available resources, such as the FirstEnergy website. At the point when the Companies no longer have analog meters in stock, a bill message will notify all customers that a smart meter may be installed on their home or business if the Companies need to replace a non-working analog meter. Because these maintenance exchanges will happen outside of the scheduled deployment plan, these customers will not receive the standard brochure and letter, but will be given a door hanger to notify them of the exchange.

Ongoing Media Relations and Outreach: As important milestones are reached in smart meter installation and functionality, the Companies will proactively engage with media representatives to communicate those achievements. In addition, the Companies will continue to respond to any media inquiries to provide support of reporters and media outlets who wish to cover deployment progress.

Metrics and Evaluation

Metrics and Evaluation Throughout Smart Meter Deployment

Consistent and effective communication is necessary for customer acceptance and the successful deployment of smart meters across their utility service area, and will help address the following three primary challenges:

- Focusing on the overall progress of communication to avoid allowing small-scale problems to create disproportionate customer skepticism and unhappiness, which has occurred in the experiences of other utilities.
- Engaging customers early in the implementation process.
- Measuring and monitoring RF-challenged areas as needed.

Changing customer opinions, awareness and understanding may be tracked based on survey results, including baseline and subsequent surveys. Sample measures to be tracked on customer awareness and understanding include the following:

- Percent awareness of smart meter installation (baseline and subsequent survey)
- Percent awareness of purpose of the smart meter installation (baseline and subsequent survey)
- Number and rate of smart meter installation complaints, claims or feedback requests
- Number and percent of missed installation appointments, broken out by reasons.

RISK MITIGATION PLAN

Though smart meters will bring new features to customers, the introduction of new technology and the transition to a new way of managing energy has the potential to cause confusion and concerns among customers and the community.

Objectives

The Companies' communications, customer contact and smart meter teams will draw on best practices and lessons learned by utilities across the country. The Companies are prepared to anticipate, quickly respond to and address any situations that could arise during the deployment stage. The Companies plan to mitigate customer issues by creating a highly focused customer relations team to internally prioritize communications and response activities as problems are identified, and track problems individually and sort them into groups of similar issues. Quickly resolving issues for customers will improve customer experiences not only with smart meters but also with their utility.

Plan Components

The Companies' approach to managing smart meter deployment issues is guided by the following principles:

- **Keeping Customers Informed:** Work to communicate the smart meter installation plan and all related policies and procedures to customers using multiple channels to proactively answer questions and address concerns.
- **Customer Segmentation:** The Companies may look to address population segments differently and customize communication accordingly, particularly in dealing with concerns and fears.
- **Anticipation of Concerns:** Proactively address concerns to prevent problems and complaints before they occur.
- **Empathy for Customers:** Increase their dialogue with customers to ensure that the Companies hear and understand them, and approach each customer concern with courtesy and respect.

A cross-functional business team is working to proactively identify potential customer questions and concerns. The team will develop a comprehensive risk mitigation procedure to determine how various types of issues will be routed, and develop a process to address and resolve them. The Companies' plan for risk mitigation includes the following key activities:

- Proactive communication of upcoming changes to manage customer expectations
- Using existing processes to address and escalate issues
- Encourage all teams to report any issues related to deployment and ensure all are documented, resolved and compiled for easy reference

- Timely response to customer feedback and resolving concerns to their satisfaction
- Prepare potential solutions for issues, with more focus on developing these solutions for recurring issues
- Perform analysis of resolved issues to quantify and understand causes; proactively prevent recurrence of such issues
- Applying best practices throughout the process
- Provide post review with the team

The Companies must regularly review and compile feedback, then prioritize, route and address them appropriately. Areas where customer feedback may become apparent include the following:

- The Customer Contact Center
- Experiences of smart meter installation contractors
- Letters, emails or SMS messages from customers
- Social media messaging and forum postings
- Direct inquiries to executive management and/or staff
- Media reporting
- Public officials and regulators
- The Commission
- Interested stakeholders

Once the issues have been documented, they will generally be routed to the team designated to handle smart meter related issues. Representatives from this team are trained and equipped to resolve customer issues. All Company employees with direct contact with customers will be trained on the protocol to handle issues if they come up with a customer, and where to direct customers with questions or concerns about the smart meter installation process. Specifically, legislator inquiries will be handled by the Companies' governmental affairs team and media inquiries will be handled by the Companies' Communications Department.

The Companies will specifically train and equip customer-facing employees to take a leadership role as ambassadors of the Smart Meter program:

- **Corporate Communications and smart meter communications team:** Will set the overall communications strategy; develop, provide and train employees to use resources such as the FAQs, talking points and data sheets.
- **Customer Contact Center:** Will be trained to handle smart meter-related issues and billing inquiries, in addition to typical utility-related questions.
- **Customer Support:** Will handle questions and issues for large industrial accounts.
- **All Field Employees (i.e. Meter Readers, Meter Services, and Lineman):** Meetings and educational materials will be provided to all field employees to ensure a positive, common understanding of the roll out and features with smart meters.

- **Billing department:** Billing concerns may be routed through the billing department, or may be routed to the billing department. Members of this department will need to understand how to manage billing complaints with new meters and how to troubleshoot.
- **Meter Installation contractor team:** Will handle questions and issues arising during the installation process.

The Companies envision the risk mitigation process flow to mirror some variation of the following scenarios:

1. Customer contacts the Customer Contact Center and is connected to speak with a representative.
2. Customer Contact Center representative finds out what the inquiry or issue is for the customer, including any background information that may be useful during the resolution process.
3. Customer Contact Center representative helps to resolve the concern using available resources, such as existing protocols, FAQ resources, etc. If the issue is successfully resolved, the issue is logged and closed out. If the issue is not resolved, it is escalated to the Smart Meter project team.
4. If the issue has not been resolved, the Companies will connect the appropriate departments within FirstEnergy to resolve the issue and will contact the customer in a timely manner with an update and/or solution. Ongoing progress will be logged. The issue will be closed out once it has been resolved.

BUDGET

The Companies estimated their costs associated with planning and implementing the Communications Plan. The proposed budget covers both internal and external resources and support and is based on proposed deployment-related spending by calendar year.

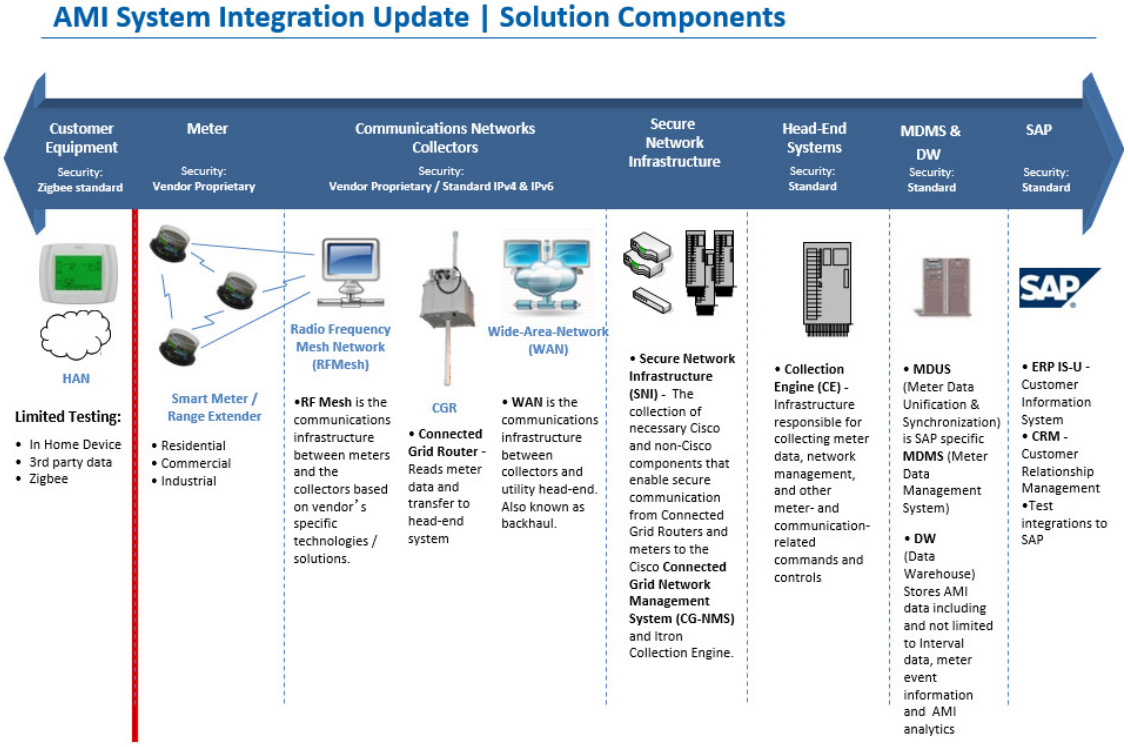
The Companies have estimated a total communications budget of $19 million for Stages 1 through Stage 3.

Communication Budget Total = $19M	Stage 1: Post Grace Stage									
		Stage 2: Solution Validation Stage								
				Stage 3: Full Scale Deployment						
	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022
	$1M	$1.25M	$2M	$2.75M	$2.75M	$2.75M	$2.5M	$2M	$1M	$1M

This Customer Communication budget includes funding for Legal, Regulatory Consulting, Corporate Communications, and all media initiatives.

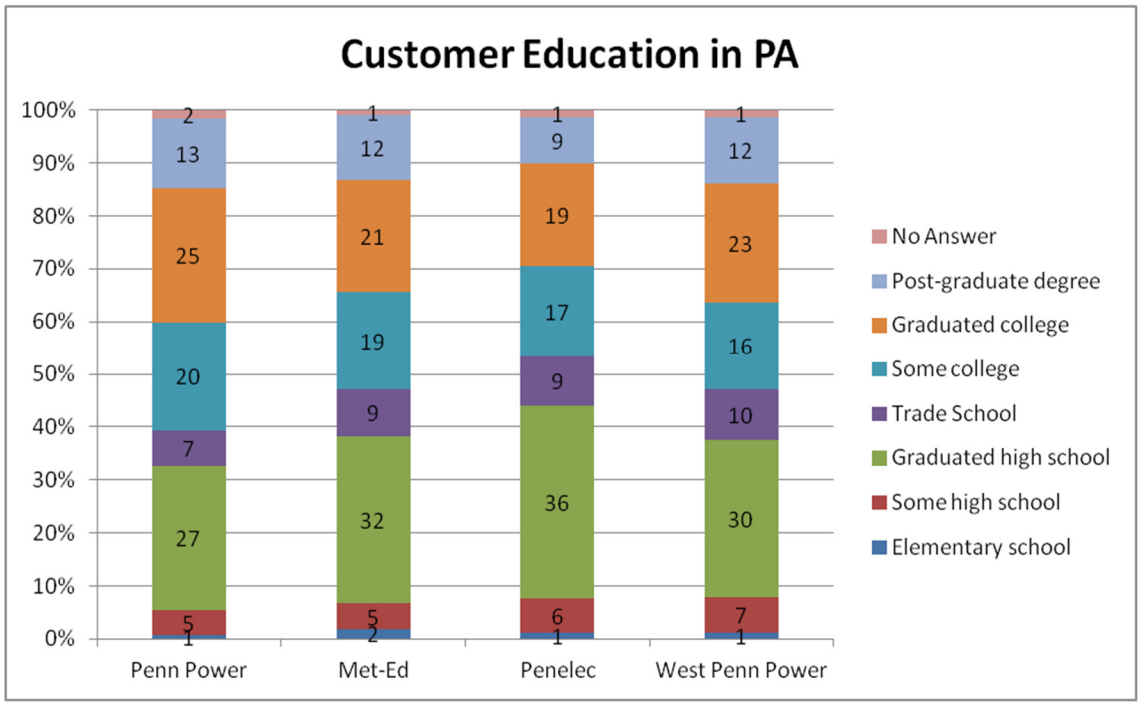
APPENDICES

Appendix A: Pennsylvania Smart Meter Infrastructure

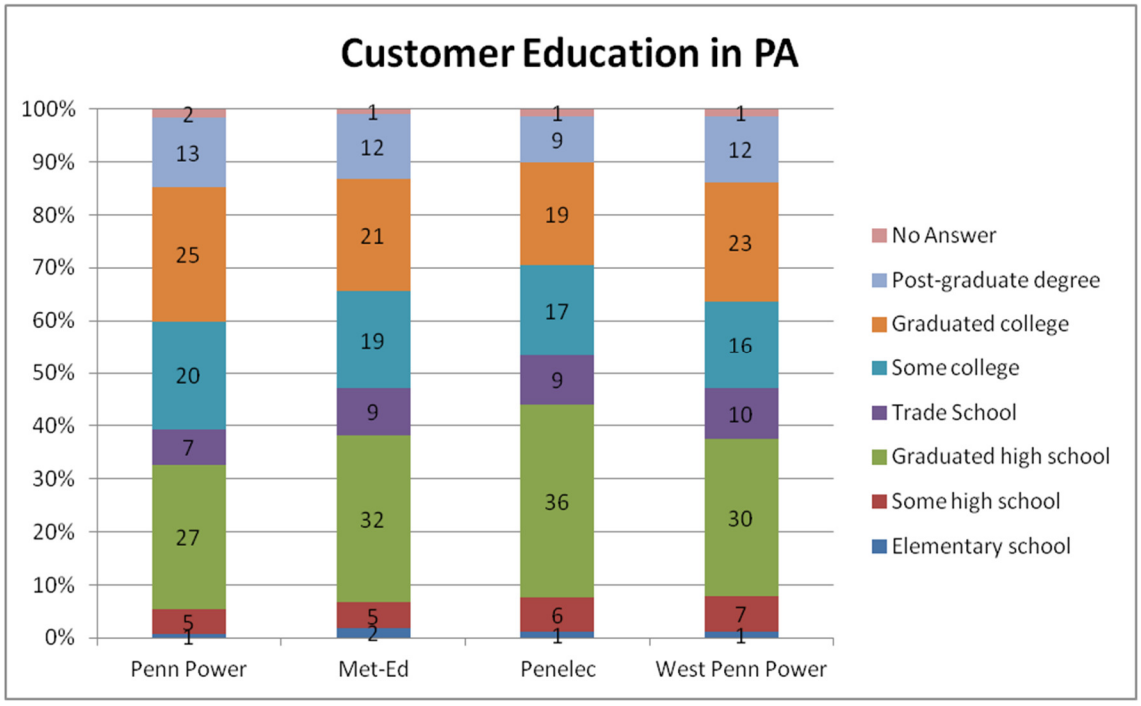


Appendix B: Audience Demographics

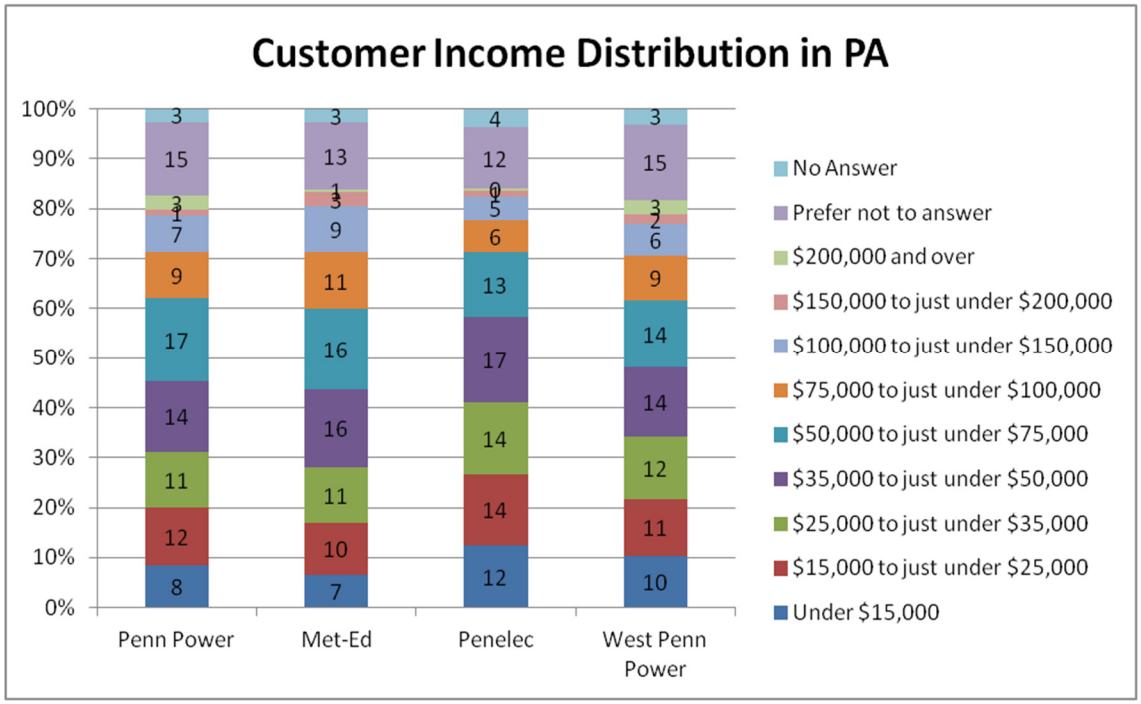
Education



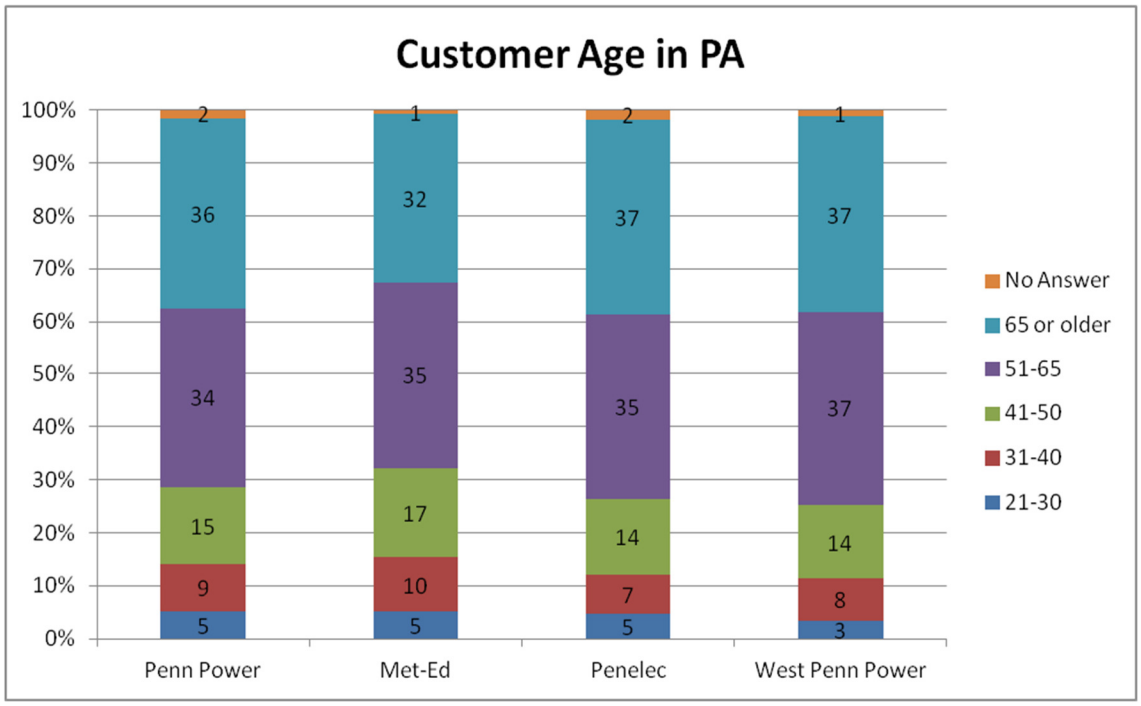
Education



Income

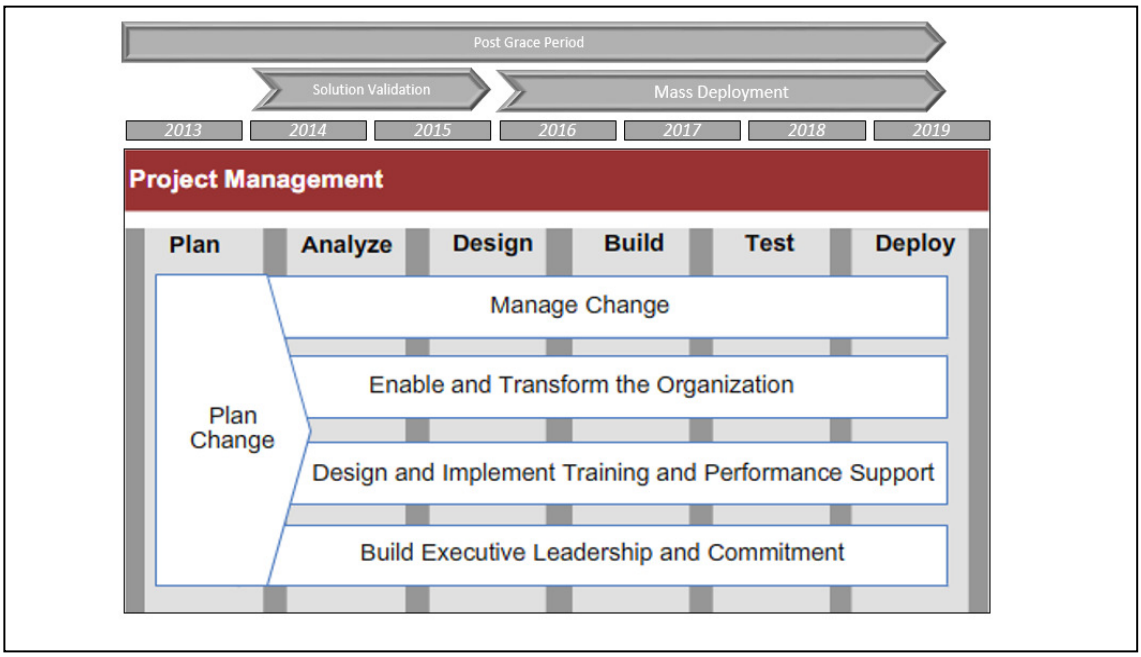

Customer Income Distribution in PA
100%
90%
80%
70%
60%
50%
40%
30%
20%
10%
0%
Penn Power
Met-Ed
Penelec
West Penn Power
No Answer
Prefer not to answer
$200,000 and over
$150,000 to just under $200,000
$100,000 to just under $150,000
$75,000 to just under $100,000
$50,000 to just under $75,000
$35,000 to just under $50,000
$25,000 to just under $35,000
$15,000 to just under $25,000
Under $15,000

Age

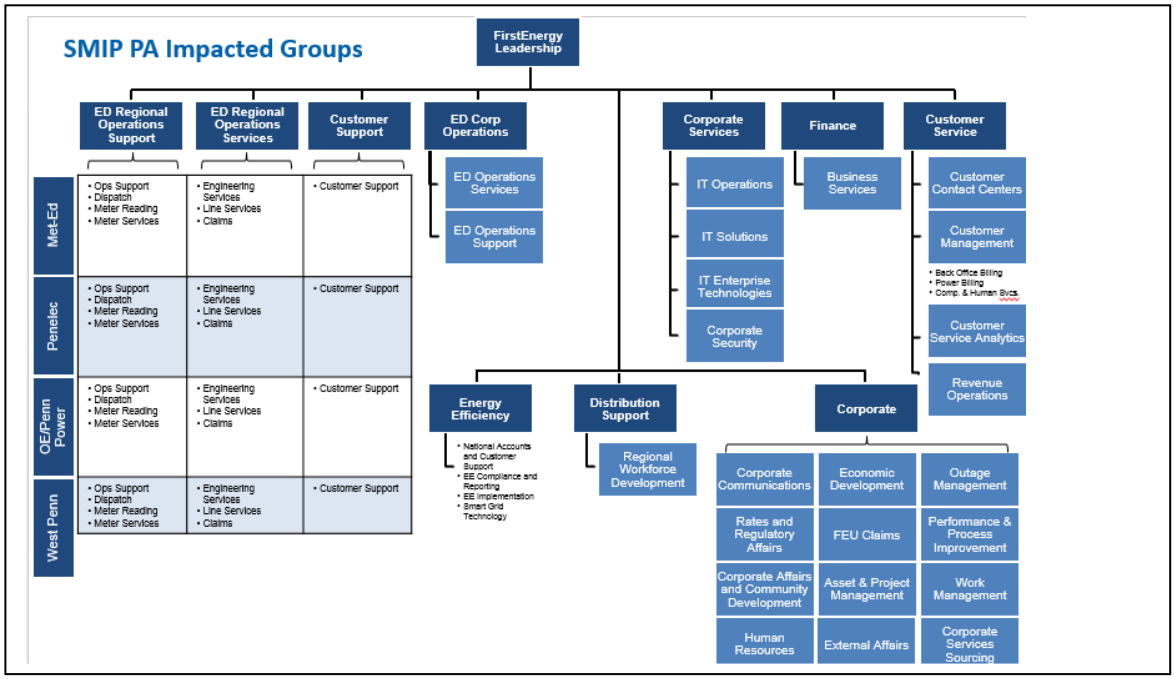

Customer Age in PA
100%
90%
80%
70%
60%
50%
40%
30%
20%
10%
0%
Penn Power
Met-Ed
Penelec
West Penn Power
No Answer
65 or older
51-65
41-50
31-40
21-30

Appendix C: Change Management Plan Overview

The Companies' Change Management team will utilize the approach below to plan for and manage the change for the duration of the program.

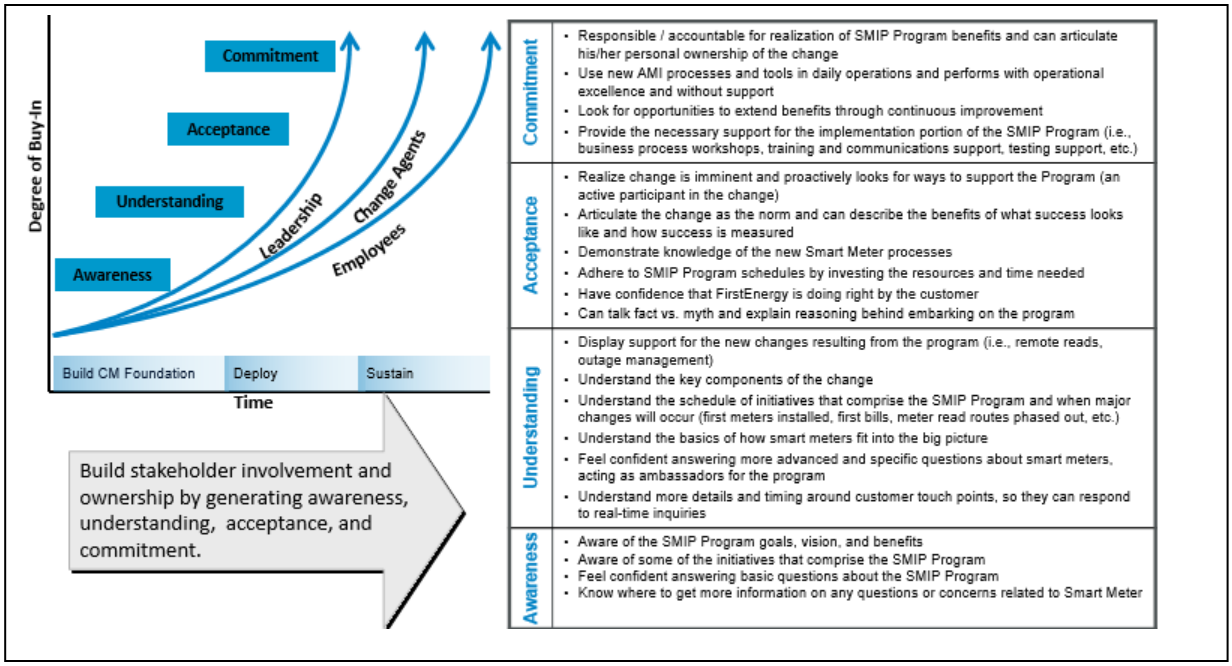


The Companies' change management team will focus their efforts on a number of groups throughout the organization to ensure full support of the program.

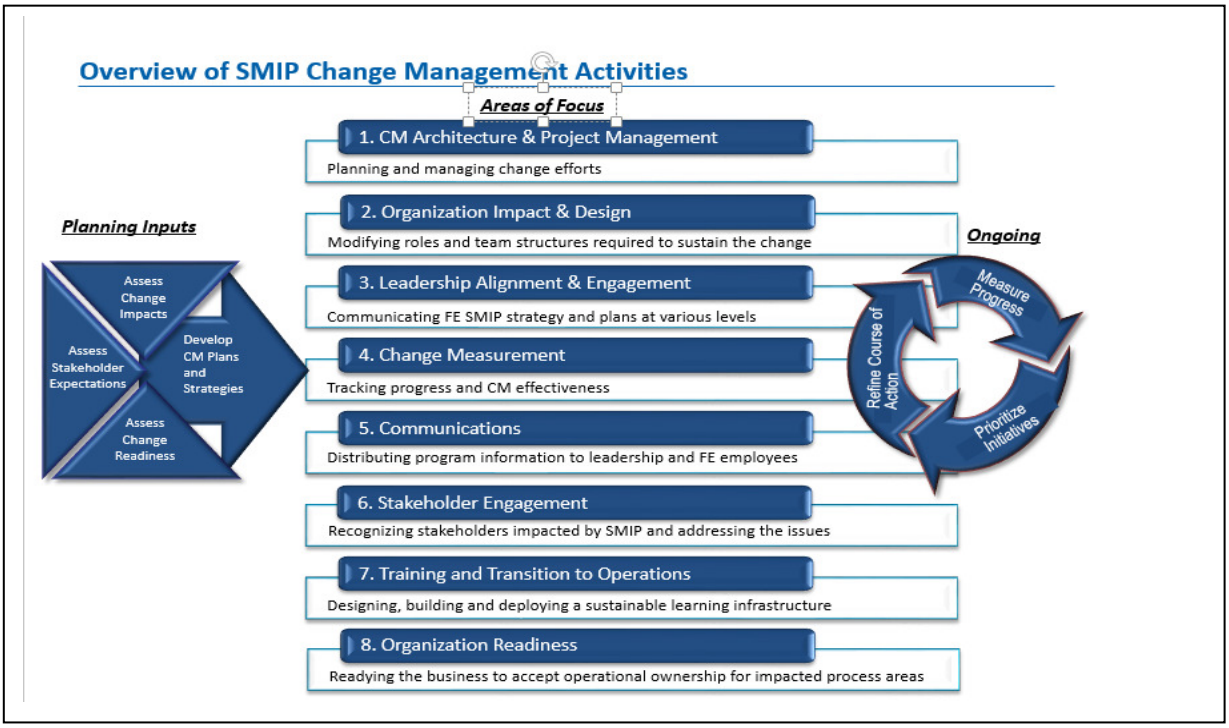


Appendix C: Change Management Plan Overview

Engagement will drive ownership and accountability which will help stakeholder groups move up the change curve from awareness to commitment. Different stakeholder groups require different timelines and levels of buy in.

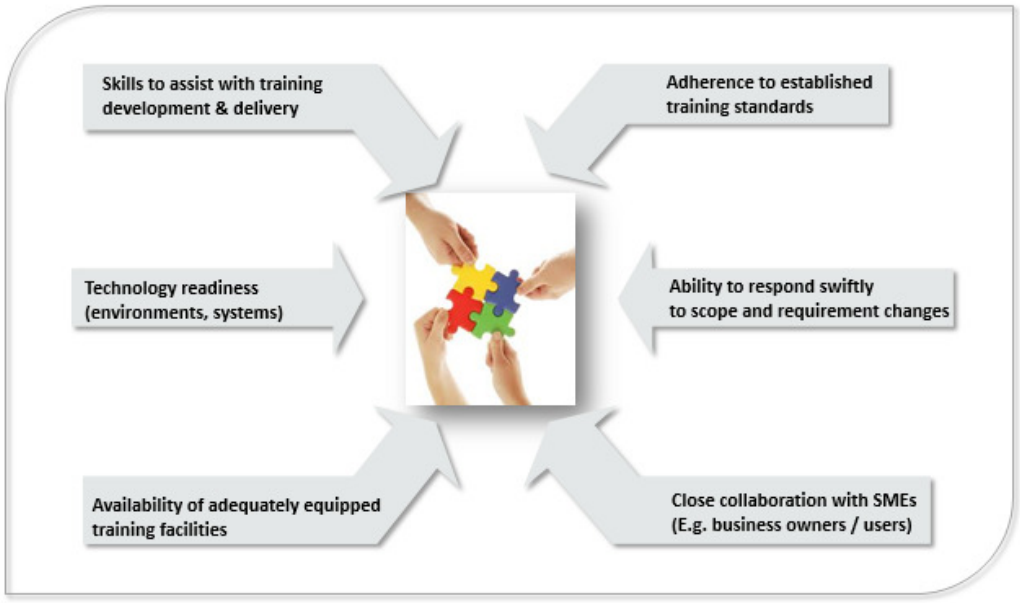


This chart identifies the step-by-step process that the Companies will employ to drive change within the organization, while maintaining an ongoing emphasis on measuring progress and adapting priorities as necessary.



Appendix D: Training Plan Overview

The Companies' approach this training with three key objectives: 1) to provide users with the skills and knowledge to perform business functions with minimal interruption, 2) increase effectiveness of training by tailoring course content and delivery methods for each group's specific needs, and 3) ensure end users understand the context behind the solutions and changes being introduced. The successful execution of the training strategy is dependent on the following:



To provide the most effectiveness training courses, participants' feedback is key. Through course surveys and learning evaluations, the trainers will be able to readily determine if the participants were successful in learning the content and if the objectives of the course were met – and training will be continually refined to achieve results.

Measurement Tools

- *Knowledge Checkpoints*: Each participant will complete checkpoints throughout the course to allow the trainer to determine if the content is being retained; typically at the end of each module
- *Final Assessment* - A final assessment will review all course content to ensure the participants retain the knowledge and skills needed to perform their job
  - Results provide insight into how well the participants are learning the material and will help the training team evaluate if adjustments are required

Feedback Mechanisms

- *Course survey*: Each participant will complete a survey that will measure the participants' impression of the course
  - Questions about the quality of the instructors, content, facilities, usefulness of activities/exercises, and delivery methods
  - Participants can respond candidly and are assured anonymity in their responses
  - Feedback is reviewed by the change management team and will provide input for possible adjustments

Appendix E: Example Pennsylvania Smart Meter Frequently Asked Questions

FAQs

Q: What is a smart meter?
A: A smart meter is a digital electric meter that collects electricity usage information and sends that data to the local utility through a secure telecommunications connection.

Q: Who pays for the smart meter technology?
A: Pennsylvania Act 129 mandates that customers pay for the development and deployment of smart meter technology throughout our service area. This Smart Meter Charge is reviewed and approved by the Pennsylvania Public Utility Commission on an annual basis and is subject to change.

Q: What if I don't want a smart meter?
A. The company is required by Pennsylvania law to install a smart meter for all of our Pennsylvania customers by 2025.

Q. When will a smart meter be installed on my home/business?
A. Starting in 2013, the companies began providing smart meters in new construction and to all residential, commercial and industrial customers who request them. Beginning in 2014, the companies will start installing smart meters to all customers. Please see our Installation Schedule for a more detailed look at when we will be installing meters in your area.

Q. Will I be notified when I am receiving the smart meter?
A. Approximately one month before your meter is exchanged, you will receive a brochure in the mail to provide you with information about the meter and the installation process. A few weeks prior to the actual installation date, you will receive a letter that will give you the time period when we will be in your area to exchange your meter. On the day of the installation, an installer will come to your door to let you know they are installing your meter. If no one is home, we will leave a door hanger either indicating that the meter has been changed or asking you to contact us to schedule an appointment to change your meter.

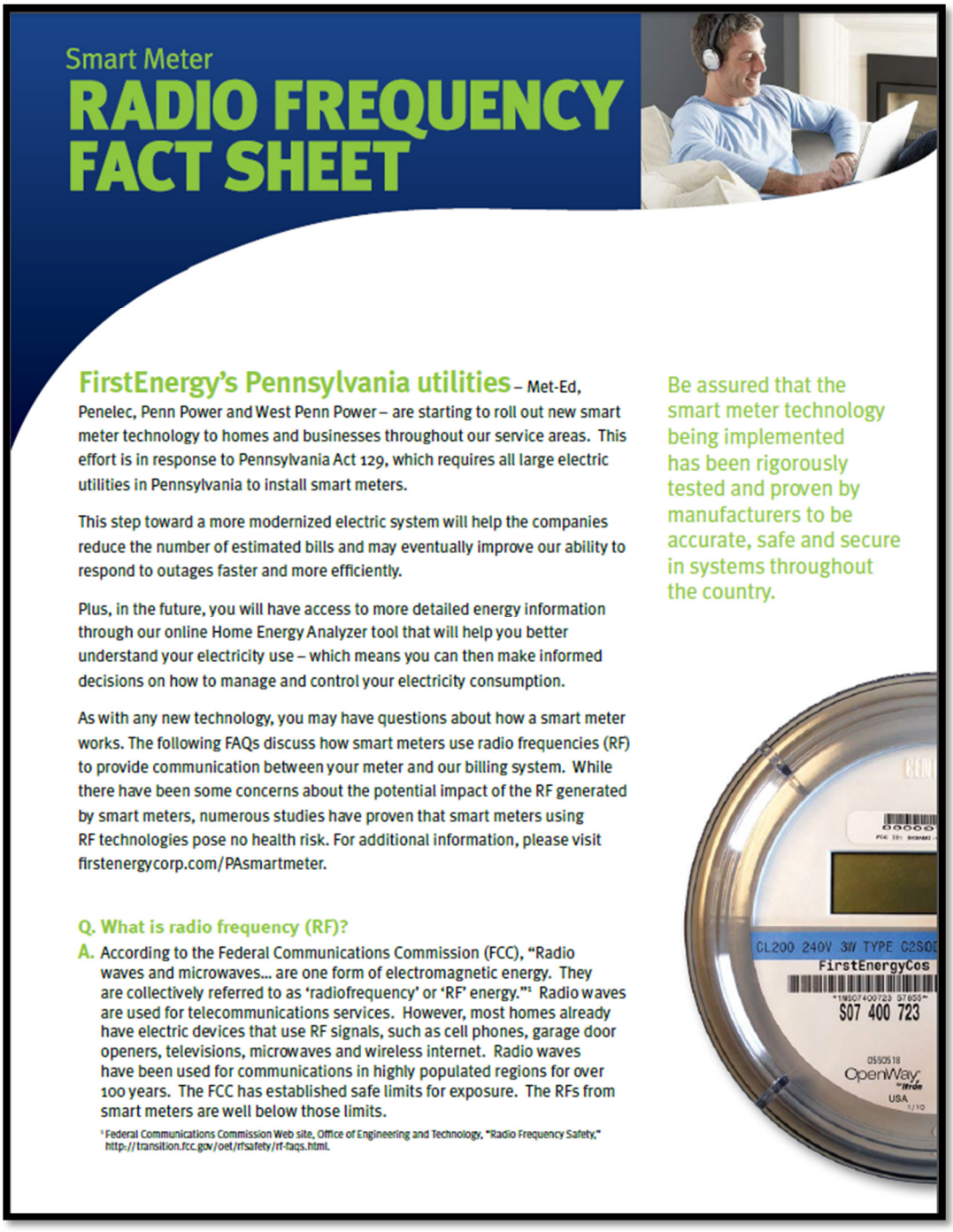
Q. Do I need to make an appointment for my smart meter installation?
A. Most smart meter installations will be performed without an appointment. Every effort is made to notify you in advance of your meter installation. In addition to mailings, the installer will come to your door before beginning work. Appointments for special needs will be handled on a case-by-case basis.

Q. How can I tell if my meter is a smart meter?
A. Smart meters are digital, so they will display numbers instead of dials. In addition, our smart meters have a blue stripe across the face.

Q. Will power to my home be interrupted during the meter installation?
A. There will be a brief interruption in your electric service when the meter is being installed, so you may need to reset some of your electronic equipment.

Q. Who will be installing my meter?
A. The meters will be installed by company personnel or an installation vendor. Please be aware that all of our installers will be carrying proper identification. If the installer cannot show you an identification card, or if you have a concern about that person's identity, please call us at [phone number].

Appendix F: Example Fact Sheet: Radio Frequency



Smart Meter

RADIO FREQUENCY FACT SHEET

FirstEnergy's Pennsylvania utilities – Met-Ed, Penelec, Penn Power and West Penn Power – are starting to roll out new smart meter technology to homes and businesses throughout our service areas. This effort is in response to Pennsylvania Act 129, which requires all large electric utilities in Pennsylvania to install smart meters.

This step toward a more modernized electric system will help the companies reduce the number of estimated bills and may eventually improve our ability to respond to outages faster and more efficiently.

Plus, in the future, you will have access to more detailed energy information through our online Home Energy Analyzer tool that will help you better understand your electricity use – which means you can then make informed decisions on how to manage and control your electricity consumption.

As with any new technology, you may have questions about how a smart meter works. The following FAQs discuss how smart meters use radio frequencies (RF) to provide communication between your meter and our billing system. While there have been some concerns about the potential impact of the RF generated by smart meters, numerous studies have proven that smart meters using RF technologies pose no health risk. For additional information, please visit firstenergycorp.com/PAsmartmeter.

Q. What is radio frequency (RF)?

A. According to the Federal Communications Commission (FCC), "Radio waves and microwaves... are one form of electromagnetic energy. They are collectively referred to as 'radiofrequency' or 'RF' energy."[1] Radio waves are used for telecommunications services. However, most homes already have electric devices that use RF signals, such as cell phones, garage door openers, televisions, microwaves and wireless internet. Radio waves have been used for communications in highly populated regions for over 100 years. The FCC has established safe limits for exposure. The RFs from smart meters are well below those limits.

[1] Federal Communications Commission Web site, Office of Engineering and Technology, "Radio Frequency Safety," http://transition.fcc.gov/oet/rfsafety/rf-faqs.html.

Be assured that the smart meter technology being implemented has been rigorously tested and proven by manufacturers to be accurate, safe and secure in systems throughout the country.

Appendix G: Example Customer Letter

Your power is about to get
BRIGHTER.

[Contact]
[Company Name 1]
[Company Name 2]
[Address]
[City], [State] [Zip]

Re: We are exchanging the electric meter at [service address]

Dear Customer,

In the next few weeks, we will be installing smart meters on homes and businesses in your area. This effort is in response to Pennsylvania Act 129, which requires all large electric utilities in Pennsylvania to install smart meters.

This step toward a more modernized electric system will help us reduce the number of estimated bills and may eventually improve our ability to respond to outages faster and more efficiently.

Plus, in the future, you will have access to more detailed energy information through our online Home Energy Analyzer tool that will help you better understand your electricity use – which means you can then make informed decisions on how to manage and control your electricity consumption. We will notify you once this functionality becomes available to you.

Exchanging your current meter with a smart meter takes very little time and even less effort from you. In fact, if your meter is readily accessible, you may not even need to be there when it occurs. On the day of the installation, an installer from FirstEnergy or our vendor-Wellington Energy-will come to your door to let you know they are installing your meter. If no one answers, we will leave a door hanger either indicating that the meter has been changed or asking you to contact us to schedule an appointment to change your meter.

Unless your meter is located inside your premises, the installer will not need to enter your premises. Please be aware that all of our installers will be carrying a photo identification badge from FirstEnergy. In addition, FirstEnergy installers will have FirstEnergy uniforms and trucks. Wellington Energy installers will wear a brown uniform with a Wellington logo and their white trucks will have Wellington Energy and FirstEnergy logos. If an installer cannot show you an identification badge, or if you have a concern about that person's identity, please call Wellington Energy at 1-888-317-8815.

There will be a brief interruption in your electric service when the meter is being installed, so you may need to reset some of your electronic equipment.

Be assured that the smart meter technology being implemented has been rigorously tested and proven by manufacturers to be accurate, safe and secure in systems throughout the country. If you have any questions about your installation, please call Wellington Energy at 1-888-317-8815. If you'd like more information about our smart meter program, please visit our website at firstenergycorp.com/PAsmartmeter.

Thank you.

Penn Power • Penelec* • Met-Ed* • West Penn Power**
FirstEnergy Companies

3-4-14 Produced by FirstEnergy's Communications Department.

Appendix H: Example Door Hanger (front and back)

Dear Customer,

Today we replaced your electric meter with a new digital smart meter, as required by Pennsylvania Act 129. The installation required a brief interruption in your service. As a result, you may need to reset some of your electric equipment.

This step toward a more modernized electric system will help us reduce the number of estimated bills and may eventually improve our ability to respond to outages faster and more efficiently.

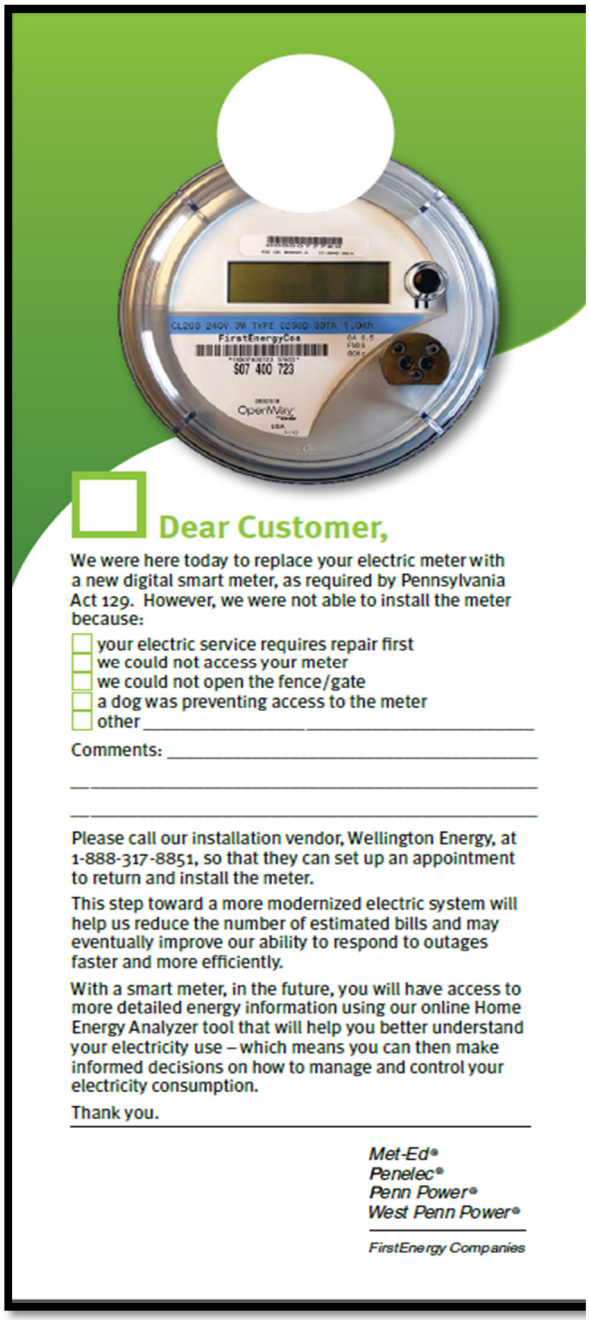
Plus, in the future, you will have access to more detailed energy information using our online Home Energy Analyzer tool that will help you better understand your electricity use – which means you can then make informed decisions on how to manage and control your electricity consumption. We will notify you once this functionality becomes available.

Be assured that the smart meter technology being implemented has been rigorously tested and proven by manufacturers to be accurate, safe and secure in systems throughout the country.

If you have questions or concerns about the installation of your smart meter, please call 1-888-317-8815. To learn more about your smart meter, please visit our website at firstenergycorp.com/PAsmartmeter.

Met-Ed®
Penelec®
Penn Power®
West Penn Power®

FirstEnergy Companies



Dear Customer,

We were here today to replace your electric meter with a new digital smart meter, as required by Pennsylvania Act 129. However, we were not able to install the meter because:

- ☐ your electric service requires repair first
- ☐ we could not access your meter
- ☐ we could not open the fence/gate
- ☐ a dog was preventing access to the meter
- ☐ other _____

Comments: _____

_____

_____

Please call our installation vendor, Wellington Energy, at 1-888-317-8851, so that they can set up an appointment to return and install the meter.

This step toward a more modernized electric system will help us reduce the number of estimated bills and may eventually improve our ability to respond to outages faster and more efficiently.

With a smart meter, in the future, you will have access to more detailed energy information using our online Home Energy Analyzer tool that will help you better understand your electricity use – which means you can then make informed decisions on how to manage and control your electricity consumption.

Thank you.

Met-Ed®
Penelec®
Penn Power®
West Penn Power®

FirstEnergy Companies