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April 25, 2016

Ms. Susan Cospier
Technical Director
File Reference No. 2016-210
Financial Accounting Standards Board
401 Merritt 7
PO Box 5116
Norwalk, CT 06856-5116

Re: Proposed Accounting Standards Update – Compensation–Retirement Benefits (*Topic 715*)
File Reference No. 2016-210

Dear Ms. Cospier:

FirstEnergy Corp. appreciates the opportunity to respond to the Proposed Accounting Standards Update, Compensation–Retirement Benefits (*Topic 715*).

FirstEnergy is a diversified energy company in the United States with approximately \$52 billion of assets, \$15 billion in annual revenues, and \$15 billion in market capitalization. Our subsidiaries are involved in the generation, transmission and distribution of electricity. Our ten utility operating companies and two transmission companies comprise one of the nation's largest investor-owned electric systems, serving six million customers in the Midwest and Mid-Atlantic regions. Our subsidiaries control nearly 17,000 megawatts of capacity from a diverse mix of non-emitting nuclear, scrubbed coal, natural gas, hydroelectric and other renewables.

We support the Financial Accounting Standards Board (FASB) in their objective to improve the effectiveness of disclosures in the notes to financial statements by facilitating clear communication of the information required by GAAP that is most important to users; however we have some concerns noted below.

Question 1: Would the proposed amendments result in more effective, decision-useful information about defined benefit pension and other postretirement plans? If not, please explain why. Would the proposed amendments result in the elimination of decision-useful information about defined benefit pension and other postretirement plans? If yes, please explain why.

FirstEnergy believes most of the proposed amendments to be added to the disclosure requirements will increase the effectiveness and decision-usefulness of the information provided. However, in particular, we do not believe a description of the nature of the benefits provided, the employee groups covered, and the type of benefit plan formulas would be meaningful when a company has numerous benefit formulas related to various employee groups existing in several different plans. We believe this proposed addition would not add meaningful value or provide predictive value of future cash flows to readers, as significant amounts of additional data would be needed to correlate expanded plan description disclosures to the potential financial impacts.

We agree with the proposed eliminations of certain disclosures and do not believe it results in the elimination of any decision-useful information.

Question 2: Are the proposed disclosure requirements operable and auditable? If not, which aspects pose operability or auditability issues and why?

Yes, we believe the proposed disclosure requirements are operable and auditable.

Question 3: Would any of the proposed disclosures impose significant incremental costs? If so, please describe the nature and extent of the additional costs.

We do not believe any of the proposed disclosures would impose significant incremental costs.

Question 4: Are there any other disclosures that should be required by Subtopic 715-20 on the basis of the proposed Concepts Statement or for other reasons? Please explain why.

We have not identified any other disclosures that should be required that would improve the effectiveness or decision-usefulness of the disclosure.

Question 5: Are there any other disclosure requirements retained following the review of Subtopic 715-20 that should be removed on the basis of the proposed Concepts Statement or for other reasons? Please explain why.

We do not believe there are any additional disclosure requirements that should be removed.

Question 6: How much time would be needed to implement the proposed amendments? Should the amount of time needed to implement the proposed amendments by nonpublic entities be different from the amount of time needed by public entities? Should early adoption be permitted? If yes to either question, please explain why.

We do not believe there would be a significant amount of time required to implement the proposed amendments. We believe early adoption should be permitted to enhance the effectiveness of information and to present the most important information in the disclosure.

Conclusion

FirstEnergy appreciates the opportunity to comment on the FASB's Proposed Accounting Standards Update, Compensation–Retirement Benefits (*Topic 715*). We agree with the vast majority of the amendments outlined in the proposal, but caution the FASB to consider the note we expressed above in question one.

FirstEnergy looks forward to continued participation in this important project and appreciates the opportunity to present our views.

Sincerely,

