

FIRSTENERGY CORP.
INSIDER TRADING POLICY

All directors, officers, and employees of FirstEnergy Corp. (the “Company”) and its subsidiaries, when in possession of “material nonpublic information” as described below, are considered “insiders” and are prohibited from buying or selling securities of the Company or its subsidiaries. In addition, family members and friends of directors, officers, or employees, as well as professional advisors (e.g., accountants, attorneys, investment bankers and consultants), who receive “material nonpublic information” about FirstEnergy or its subsidiaries may also be considered “insiders” while in possession of this information and may be prohibited from trading on this knowledge. Family members are defined as those members over whom you have direct control, or who live in your household, including your spouse, children, grandchildren, siblings, parents, grandparents, and in-laws (but not aunts, uncles, nieces, or nephews).

If you prepare or have access to information regarding the earnings of FirstEnergy before they are made public, you are prohibited from trading in Company securities during the period beginning the first day after the end of the preceding calendar quarter (January 1, April 1, July 1, and October 1) and ending two full business days after the earnings are announced for that preceding quarter. From time to time, trading in Company stock may also be restricted for other reasons. For example, the Company may prohibit trading for certain individuals when, in the Company’s judgment, a blackout period is warranted. Trading in Company stock is also prohibited in most instances for all directors and executive officers whenever more than 50% of participants in the FirstEnergy Savings Plan are restricted from trading in the Savings Plan for more than three consecutive business days. Also, there may be instances when you are discouraged from selling Company stock if you are subject to Company stock ownership guidelines and have not yet reached your targeted ownership level.

Notwithstanding any other prohibitions that may be in place, if you are a director or executive officer you also are prohibited from: (a) placing limit orders for Company securities that remain effective after the day on which they are placed (such as “good until cancelled” orders), except pursuant a company authorized 10b5-1 Plan, (b) making short sales of Company securities, (c) purchasing Company securities on margin, or (d) buying or selling puts or calls on Company securities.

There are typically no exceptions to this policy. However, in cases of financial hardship, the Company may make an exception. Please contact the Corporate Department for further clarification if you are seeking an exception.

Certain executive officers may frequently be in possession of material nonpublic information and thus effectively be prevented from most types of trading. In such cases, the Company may authorize the use of 10b5-1 plans. Such plans, at a minimum, must meet the requirements of the SEC for 10b5-1 plans and must be approved by the Company, which may impose additional conditions on the plan to ensure compliance with other applicable securities regulations. Currently, such plans are available to reporting persons for purposes of Section 16 of the Securities Exchange Act of 1934 and to executives specifically approved by the General Counsel of the Company. Also, the Company reserves the right to permit special purpose 10b5-1 Plans for specific events, such as the sale of shares to fulfill tax withholding obligations.

Directors and executive officers who are not in possession of material nonpublic information and would like to trade in Company securities must contact the Corporate Department to request pre-clearance. Your proposed transaction(s) will be evaluated to determine

if insider trading concerns or other concerns under securities laws and regulations are raised. The Corporate Department will notify you, by email or phone, of any decision, within 24 hours of your request. The Corporate Department also will report the proposed transaction to the Senior Vice President of Human Resources, who then will provide notification to the Compensation Committee of the Board of Directors. Clearance of a transaction is valid only for a 48-hour period. If your transaction is not completed within the required time period you will need to obtain another pre-clearance. Additionally, should you become aware of material nonpublic information after the clearance is granted and prior to the expiration of the 48-hour period, you are prohibited from trading.

Employees who want to trade Company securities and are not sure if they possess material nonpublic information should contact the Corporate Department for guidance.

This policy will be given to all new employees when they first join FirstEnergy and will be circulated to all directors, officers and employees at least annually for their review. It is also accessible using the Internet (www.firstenergycorp.com) under the Corporate Governance heading.

The Company relies upon the conduct and diligence of our directors, officers and employees to ensure full compliance with this policy. It is the personal obligation and responsibility of each director, officer and employee to act in a manner consistent with this policy.

Failure to comply with the insider trading regulations or reporting requirements may result in any of the following: (a) disgorgement of all profits to the Company or to the SEC, (b) disclosure in the annual report (Form 10-K) and proxy statement, (c) fines assessed against the individual and the Company, and/or (d) imprisonment. Moreover, anyone violating this policy is subject to disciplinary action, up to and including termination of employment.

This policy is not a binding contract, but a set of guidelines for implementation. The Company explicitly reserves the right to modify any of the provisions of this policy at any time and without notice.

The following Questions and Answers are provided to assist you in complying with this policy.

What is “material nonpublic information?”

The federal securities laws and our Insider Trading Policy prohibit you from purchasing or selling Company stock (including under your 401-K Plan) while in possession of material nonpublic information. “Material information” is defined as information, both positive and negative, that can reasonably be expected to affect the price of the Company’s stock. In other words, information is “material” if there is a substantial likelihood that a reasonable investor would consider such information important in making an investment decision to buy, sell or hold the Company’s stock. Information can be material even if it relates to future, speculative or contingent events and even if it is significant only when considered in combination with publicly available information. It is important to remember that if securities transactions come under scrutiny from the Securities and Exchange Commission (SEC), they will be analyzed after-the-fact with the benefit of twenty-twenty hindsight.

The following is a non-exhaustive list of examples of the type of information that would typically be considered to be material:

- Operating or financial results
- Changes in dividend payments
- Public or private offerings of debt or common stock
- Significant business or technology acquisitions, sales or joint ventures
- Proposals or agreements with major customers, or obtaining or losing important contracts
- Termination of agreements with major customers
- Management changes
- Product pricing changes
- Significant write-offs, restructuring charges, increases in reserves or material asset impairments
- A change in a rating agency decision, issuance of a credit watch or change in Company outlook
- Criminal charges or material civil litigation or government investigations
- Announcements regarding court cases
- Major labor disputes including strikes or lockouts
- Major changes in accounting methods
- A redemption or purchase of the Company's securities

Information is considered "public" when it has been widely disseminated through major newswire services, national news services, financial news services or through reports to the SEC. Additionally, information is not considered "public" until the investment community has been afforded the time to receive, assimilate, and act upon the information. FirstEnergy does not consider information public until two full trading days after an announcement. The circulation of rumors or "talk on the street," even if accurate, widespread and reported in the media does not constitute public disclosure. Posting of information on the Company's website is not public dissemination. Similarly, disclosing only part of the information does not constitute public dissemination. As long as any material portion of the "inside" information has yet to be publicly disclosed, the information should be deemed "nonpublic" and may not be used to trade in the Company's stock.

What happens if I am in possession of material nonpublic information?

You may not purchase or sell Company stock (including stock of subsidiaries) when you are aware of any material nonpublic information about the Company, no matter how you became aware of the information. You also must not provide material nonpublic information to anyone not requiring such information for legitimate business purposes, including your immediate family, friends or anyone acting for you (such as a stockbroker). You may, from time to time, have to forego a proposed transaction, even if you planned to enter into the transaction before learning of material nonpublic information, and even though you believe you may suffer an economic loss or forego an anticipated profit by waiting.

Material nonpublic information relating to the Company is the property of the Company and the unauthorized disclosure of such information is prohibited. Keep all correspondence and other documents relating to material nonpublic information in your possession in a secure place, such as a locked office or locked file cabinet. If you receive

an inquiry from outside the Company, such as from a stock analyst, for information that may be material nonpublic information, the inquiry should be referred immediately to the Investor Relations Department, which is responsible for coordinating and overseeing the release of such information to the investing public, analysts, and others in compliance with the applicable laws and regulations.

Are directors and executive officers subject to more stringent insider trading regulations?

Yes. In addition to the limitations listed above, directors and executive officers must report all Company holdings to the SEC within ten days of becoming a director or executive officer and report all stock transactions within two days. They are also prohibited from buying any Company stock within six months before or after a sale of Company stock, or selling any Company stock within six months before or after a purchase of Company stock. In order to ensure that their transactions are within the requirements of the law, directors and executive officers are required to obtain pre-clearance for all stock transactions.

What laws govern insider trading?

Laws and regulations applicable to insider trading include: The Securities Act of 1933; the Securities Exchange Act of 1934; The Insider Trading and Securities Fraud Enforcement Act; Regulation FD (Fair Disclosure); and The Sarbanes-Oxley Act of 2002. Additionally, we must comply with various State regulations and The New York Stock Exchange Rules.

Who do I contact if I have questions about the insider trading restrictions or this policy?

If you have a question as to a potential application of insider trading laws or any other restrictions on insider trading, or if you know of a suspected violation of these laws, please contact Corporate Services at (330) 384-5748 (internal 825-5748).

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