ECKERT SEAMANS

Eckert Seamans Cherin & Mellott, LLC
213 Market Street - 8th Floor
Harrisburg, PA 17101

TEL 717 237 6000
FAX 717 237 6019
www.eckertseamans.com

Deanne M. O'Dell
717.255.3744
dodell@eckertseamans.com

December 19, 2011

Via Electronic Filing
Rosemary Chiavetta, Secretary
PA Public Utility Commission
PO Box 3265
Harrisburg, PA 17105-3265

Re: Joint Petition of Metropolitan Edison Company, Pennsylvania Electric Company, Pennsylvania Power Company and West Pen Power Company for Approval of Their Default Service Programs, Docket Nos. P-2011-2273650, P-2011-2273668, P-2011-2273669 and P-20112273670

Dear Secretary Chiavetta:

On behalf of the Retail Energy Supply Association ("RESA") enclosed for filing is the original of its Petition to Intervene and Prehearing Memo along with the electronic filing confirmation for each of the documents with regard with regard to the above-referenced matter. Copies to be served in accordance with the attached Certificate of Service.

Very truly yours,

Deanne M O'Dell /lww

Deanne M. O'Dell

DMO/lww
Enclosure

cc: Hon. Elizabeth Barnes w/enc.
Cert. of Service w/enc.

CERTIFICATE OF SERVICE

I hereby certify that this day I served a copy of RESA's Petition to Intervene and Prehearing Memoupon the persons listed below in the manner indicated in accordance with the requirements of 52 Pa. Code Section 1.54.

Via Email and/or First Class Mail

Johnnie E. Simms, Esq.
PA Public Utility Commission
Bureau of Investigation & Enforcement
PO Box 3265
Harrisburg, PA 17101-3265
josimms@pa.gov

Irwin Popowsky, Esq.
Office of Consumer Advocate
5th Floor, Forum Place
555 Walnut Street
Harrisburg, PA 17101-1923
spopowsky@pa.gov

Terry Sneed, Esq.
Office of Small Business Advocate
1102 Commerce Building
300 N. Second St.
Harrisburg, PA 17101
tsneed@pa.gov

Thomas P. Gadsden, Esq.
Kenneth M. Kulak, Esq.
Morgan, Lewis & Bockius
1701 Market St.
Philadelphia, PA 19103-2921
tgadsden@morganlewis.com
kkulak@morganlewis.com

Charis Mincavage, Esq.
Susan Bruce, Esq.
McNees Wallace & Nurick LLC
100 Pine Street
PO Box 1166
Harrisburg, PA 17108-1166
cmincavage@mwn.com

James L. Crist
4226 Yarmouth Dr., Suite 101
Allison Park, PA 15101

Acclaim Energy Advisors
Two Riverway, Suite 800
Houston, TX 77056

Cheryl Lecce, President
ADL High Voltage Inc.
629 Deerwood Lane
Keller, TX 76248

Affiliated Power Purchases
International, LLC
224 Phillip Morris Dr., Suite 402
Salisbury, MD 21804

Edward C. Jackson
Affinity Energy Management LLC
220 Cherry Blossom Place
Hockessin, DE 19707

John Munsch, Esq.
Allegheny Energy Supply Company LLC
800 Cabin Hill Drive
Greensburg, PA 15601
jmunsch@alleghenyenergy.com

Alpha Buyer LLC
1410 Russell Road, Suite 102
Paoli, PA 19301

Claire Lamb
Ameresco Inc.
Point West Place
111 Speen St., Suite 410
Framingham, MA 01701

American Approved Commercial LLC
13451 McGregor Blvd., Suite 29
Fort Myers, FL 33919

Robert J. Kreppel, President
American Power Partners LLC
8205 Main St., Suite 11
Buffalo NY 14221

American Powernet Management LP
45 Commerce Dr.
Wyomissing, PA 19610

Anthracite Power and Light Company
10 Gilberton Rd.
Gilberton, PA 17934

Keith Townsend, Esq.
AOBA Alliance, Inc.
1050 17th St., NW, Suite 300
Washington, DC 20036

Jeffrey Chen, Esq.
AP Gas & Electric 6161 Savoy Dr.,
Suite 500
Houston, TX 77036

R. Scott Helm, President
APN Starfirst LP
45 Commerce Dr.
Wyomissing, PA 19610

Arcelormittal USA LLC
900 Conshohocken Rd.
Conshohocken, PA 19428-1038

Jonathan Peele President
Aspen Energy Corporation
9550 Dublin Rd., Suite C
Powell, OH 43065

James McDonnell
Avalon Energy Services LLC
5507 Lambeth Rd.
Bethesda, MD 20814

Steve Garson
Better Cost Control LLC
2274 Washington St.
Newton, MA 02462

Jessica Renneker, Esq.
Regulatory Agent
Blue Pilot Energy LLC
250 Pilot Rd., Suite 300
Las Vegas, NV 89119

Bluestar Energy Services Inc.
198 Hostetter Lane
Lancaster, PA 17602

Meridee A. Kramb, VP
BMark Energy, Inc.
791 Price St., #177
Pismo Beach, CA 93449

Richard P. Brookman
Brice Associates LLC
477 Cafferty Rd.
Erwinna, PA 18920

John Munn, Esq.
Brighten Energy LLC
6555 Sierra Dr.
Irving TX 75039

Mark S. Schroeder
Managing Member
BTU Energy LLC
1701 Conowingo Rd.
Bel Air, MD 21014-1816

Veronica Turner
Regulatory Agent
Champion Energy Services
13831 Northwest Freeway, Suite 250
Houston, TX 77040

Kiki Dikmen, Managing Agent
Choice Energy Services, Retail
5718 Westheimer, Suite 1310
Houston, TX 77057

Michael Dowling
Chrislynn Energy Services, Inc.
301 Appleridge Court
Gibsonia, PA 15044

Joan Parker
Regulatory Agent
Clearview Electric Inc.
PO Box 130659
Dallas, TX 75313-0659

Co-Exprise Inc.
6021 Wallace Rd. Extension
Suite 300
Wexford, PA 15090

Martin F. Brown, VP
Commercial Utility Consultants
Westtown Business Center
1556 McDaniel Dr.
West Chester, PA 19380

Community Energy Inc.
Three Radnor Corporate Center
1500 Oxford Dr., Suite 210
Bethel Park, PA 15102

Comperio Energy LLC d/b/a
Clearchoice Energy
1500 Oxford Dr., Suite 210
Bethel Park, PA 15102

Conedison Solutions Inc.
701 Westchester Ave., Suite 300 East
White Plains, NY 10604

Conocophillips Company
100 Constellation Way, Suite 1200C
Baltimore, MD 21202

Consumer Energy Solutions Inc.
1255 Cleveland St.
Clearwater, FL 33755

Coral Power LLC
909 Fannin Plaza, Suite 700
Houston, TX 77010

Alan Lehmann, President
Current Choice Inc.
46 Munroe Rd.
Lexington, MA 02421

Customer Acquisition Specialists of
America
1315 Cleveland St.
Clearwater, FL 33755

Amy Slack
Direct Energy Business LLC
1001 Liberty Ave.
Pittsburgh, PA 15222

Direct Energy Services LLC
7385 N. State Route 10
Westerville, OH 43082

Pete McCawley
Chief Operating Officer
Discount Energy Group LLC
22809 Pacific Coast Highway #100
Malibu, CA 90265

Dominion Energy Solutions
PO Box 298
Pittsburgh, PA 15230-0298

Joyce Reives, VP
DPL Energy Resources Inc.
1065 Woodman Dr.
Dayton, OH 45432

Gregory V. Staton, Esq.
DTE Energy Trading Inc.
414 S. Main St., Suite 200
Ann Arbor, MI 48104

Duke Energy Retail Sales LLC
139 E. Fourth St., Room EA 600
Cincinnati, OH 45202

Gary A. Jack, Esq.
Kelly L. Geer, Esq.
Duquesne Light Company
411 Seventh Ave., 16-4
Pittsburgh, PA 15219
gjack@duqlight.com
kgeer@duqlight.com

E Source Companies LLC
1965 North 57th Court
Boulder, CO 80301-2826

Shawn Pandit CEO
Early Bird Power LLC
1 Adams St.
Milton, MA 02186

Efficient Energy Solutions LLC
1508 Shadow Ridge Circle
Woodstock, GA 30189

Sandy Eisenbach
Managing Director
Eisenbach Consulting LLC
921 Shiloh Rd., Suite B-300
Tyler, TX 75703

Employers' Energy Alliance of PA, Inc.
2171 West 38th St.
Erie, PA 16508

Michael Cordaro
Energetix Inc.
50 Methodist Hill Dr., Suite 1500
Rochester, NY 14623

Energy Advantage Inc.
501-5420 N. Service Road
Burlington ON L7L 6C7

Energy Cooperative of America
325 Delaware Ave., Suite 102A
Buffalo, NY 14202

Brian Walker, President
Energy Edge Consulting LLC
1183 Brittmore Rd., Suite 300
Houston, TX 77043

Energy Enablement LLC
130 Tanglewood Dr.
Wexford, PA 15091

Michael T. DeCarlo, President
Energy Initiatives Inc.
PO Box 479
Chester Heights, PA 19017

Hilary Trumble Manager
Energy Management Resources
1536 NE 96th Street
Liberty, MO 64068

Energy Market Exchange LLC
2825 Wilcrest Dr., Suite 656
Houston, TX 770423

Energy Plus Holdings LLC
PO Box 38815
Philadelphia, PA 19104-9728

James R. Behr
Energy Savers Inc.
306 McKnight Park Dr.
Pittsburgh, PA 15237-6534

Energy Services Providers Inc.
d/b/a PA Gas & Electric
877 South St., Suite 4W
Pittsfield, MA 01201-8243

Energy Trust LLC
551 Fifth Ave., 37th Fl.
New York, NY 10176

Enernoc Inc.
101 Federal St., Suite 1100
Boston, MA 02110

Exelon Energy Company
300 Exelon Way
Kennett Square, PA 19348

Norkhairani Baharuddin
FirstEnergy Solutions
341 White Pond Dr. B-3
Akron, OH 44320

Gateway Energy Services Corp.
190 Wells St., Suite 110
Forty Fort, PA 18704

Jason Austin
VP and General Counsel
GDF Suez Energy Retail Solutions
1990 Post Oak Blvd., Suite 1900
Houston, TX 77056

Carolyn Horne, V.P.
GearyEnergy LLC
7712 S. Yale Ave.
Tulsa, OK 74136

Richard Freed, Esq.
GEXA Energy Pennsylvania LLC
20 Greenway Plaza, Suite 600
Houston, TX 77046

Glacial Energy of Pennsylvania, Inc.
1000 Liberty Ave.
Pittsburgh, PA 15222

Global Energy Market Services LLC
2790 Mosside Blvd., Suite 225
Monroeville, PA 15146

Global Energy Solutions Corp.
40 Schuman Blvd., Suite 305
Napersville, IL 60563

Goldstar Energy Group Inc.
915 Broadway, Suite 1406
New York, NY 10010

Max Hoover, President
Good Energy LP
232 Madison Ave., Suite 405
New York, NY 10016

Great American Power LLC
2959 Cherokee St., Suite 102
Kennesaw, GA 30144

Great Lakes Energy LLC
200 Crescent Court, Suite 1065
Dallas, TX 75201

Green Mountain Energy Co.
PO Box 689008
Austin, TX 78768

GSE Consulting LP
200 Crescent Court, Suite 1065
Dallas, TX 75201

Gayle Mausolf, President
Hawk Energy Corporation
2880 Bergey Rd., Suite W
Hatfield, PA 19440

Thomas J. Sniscak, Esq.
Hawke McKeon & Sniscak LLP
100 N. Tenth St.
PO Box 1778
Harrisburg, PA 17105
tjsniscak@hmslegal.com

Jan Kaputkin
Health Resource Network Inc.
d/b/a HRNEnergy
201 Columbia Turnpike Suite D
Florham Park, NJ 07932

Gary Pack, Esq.
HealthTrust Purchasing Group LP
155 Franklin Rd., Suite 400
Nashville, TN 37027

Marissa Bach
Hess Corporation
One Hess Plaza
Woodbridge, NJ 07095

Stephen Fabiani, Sr., V.P.
HOP Energy LLC
4 West Red Oak Lane, Suite 310
White Plains, NY 10604

Hospital Energy LLC
696 Coleman Rd.
Middletown, CT 06457

Hudson Energy Services LLC
1650 Market St., 36th Fl.
Philadelphia, PA 19103

Clifton Foster, CEO
I.C. Thomasson Associates, Inc.
2950 Kraft Dr., Suite 500
Nashville, TN 37204

IDT Energy Inc.
550 Broad St.
Newark, NJ 07102

Paul Nero, VP
Integrity Communications of Ohio
5711 Grant Ave.
Cleveland, OH 44105

Integrys Energy Services
Rosslyn Metro Center, Suite 1105
1700 Moore St.
Arlington, VA 22209

James J. Hayes, Managing Partner
Intelligen Resources LP
2100 West 7th St.
Fort Worth, TX 76107

Jack Pisarcik, VP
Interstate Gas Marketing, Inc.
2018 S. 6th St.
Indiana, PA 15701

Invado International LLC
9826 East Washington St.
Chagrin Falls, OH 44023

Michael D'Andrea, Regional Director
Keytex Energy Solutions LLC
200 Brush Run Rd., Suite C
Greensburg, PA 15601

Korenergy Ltd
618 Bear Run Lane
Lewis Center, OH 43035-8299

Jeffrey Farber, VP and Acting President
LD Energy, LLC
11 West Passaic St.
Rochelle Park, NJ 07030

Harris M. Rosen, VP and General Counsel
Liberty Power
1901 W. Cypress Creek Rd., Suite 600
Fort Lauderdale, FL 33309

Lincoln Energy Group LLC
414 N. Orleans St., Suite 500
Chicago, IL 60654

Linde Energy Services Inc.
1011 East Market St.
Bethlehem, PA 18017

Ira Holtzman
Lower Electric LLC
1307 Shermer Rd.
Northbrook, IL 60062

Michael A. Amabile, President
MAA Inc. d/b/a Industrial Energy
125 Strafford Ave., Suite 300
Wayne, PA 19087

Michelle Erca
Make the Switch USA LLC
13 Great Meadow Rd.
Redding, CT 06896

Manhattan Energy LLC
80 Broad St., 5th Floor
New York, NY 10004

Metromedia Power Inc.
60 Industrial Way West, Suite F
Eatontown, NJ 07724

Mid American Energy Company
PO Box 657
Des Moines, IA 50306-0657

Mint Energy LLC
One Rounder Way, Suite 220
Burlington, MA 01803

Howard Mitchell
Mitchell Energy Management Services Inc.
610 Berwick Rd.
Wilmington, De 19803

Curt Smith, President
Mobilenet, Inc.
d/b/a Smith Energy Group
1119 Sandstone Rd.
Greensburg, PA 15601

Judith Mondre
Mondre Energy Inc.
1880 JFK Blvd., Suite 1705
Philadelphia, PA 19103

MRDB Holdings LP d/b/a
LPB Energy Management
12700 Park Central Dr., Suite 200
Dallas, TX 75251-1501

Perry S. Oman, President
Muirfield Energy Inc.
5850 Venture Dr., Suite C
Dublin, OH 43017

MXEnergy Electric Inc.
PO Box 8127
Stamford, CT 06905-8127

Todd Yasbin, President
National Energy Management LLC
12407 North MO PAC Expressway
Suite 100-348
Austin, TX 78758

National Utility Service Inc.
1 Maynard Dr.
Park Ridge, NJ 07656-1879

Shawn P. Jefremow
Natures Current LLC
95 Fairmont Ave.
Philadelphia, PA 19123

Nextera Energy Services Pennsylvania LLC
PO Box 1400
Juno Beach, FL 33408-0420

Greg Bass, Director
Noble Americas Energy Solutions LLC
401 West A Street, Suite 500
San Diego, CA 92101

Chris Sattler
Chief Operating Officer
North American Power and Gas LLC
One Marshall St., Suite 205
Norwalk, CT 06854

Chris Greulich, VP
North Shore Energy Consulting, LLC
423 Meadowview
Sagamore Hills, OH 44067

Northeast Energy Partners Inc
174 South Road
Enfield, CT 06082

Peter Callowhill, Manager
NRGING LLC
d/b/a Netgain Energy Advisors
1775 Wiehle Ave., Suite 310
Reston, VA 20190

On-Demand Energy Inc.
1 North Shore Center, Suite 101
Pittsburgh, PA 15212

Adam Morris, CEO
Option One Energy LLC
321 N. Clark St., 5th Floor
Chicago, IL 60654

Options Consulting Services
1331 Conant Street
Maumee, OH 43537

Palmco Power PA LLC
1350 60th St.
Brooklyn, NY 11219

Paragon Advisors LLC
1730 Park St.
Naperville, IL 60563

Matthew T. Kinney Counsel
Patriot Energy Group Inc.
1 Rounder Way, Suite 200
Burlington, MA 01803

Pepco Energy Services d/b/a
Power Choice
1300 North 17th St., Suite 1600
Arlington, VA 22209

Joe Cartwright, President
PES Brokers Inc.
1305 FM 359 Suite H
Richmond, TX 77406

Steve Pincus, Esq.
PJM Interconnection, Inc.
Valley Force Corporate Center
955 Jefferson Ave.
Norristown, PA 19403-2497

Christopher Gaffney, Esq.
Planet Energy (PA) Corp.
800-10 Kingsbridge Garden Circle
Mississauga ON L5R 3K6

Platinum Advertising II LLC
PO Box 3223
Clearwater Beach, FL 33767

Power Brokers LLC
d/b/a PB2 Texas LLC
5440 Harvest Hil Rd., Suite 260
Dallas, TX 75230

PPL EnergyPlus, LLC
PO Box 25225
Lehigh Valley, PA 18002

Richard Albanese
Premier Energy Group LLC
1275 Bound Brook Rd., Suite 6
Middlesex, NJ 08846

Premier Power Solutions LLC
107 Breckenridge St.
Grove City, PA 16127

James W. Stinson, President
Price Point Energy LLC
3320 Forest Rd.
Bethel Park, PA 15102

Priority Power Management LLC
310 West Wall, Suite 500
Midland, TX 79701

Provident Energy Consulting LLC
107 Chelsey Dr., Suite 2
Media, PA 19063

David Pearsall
Public Power, LLC
39 Old Ridgebury Rd., Suite 14
Danbury, CT 06810

Ann Pierce
Rapid Power Management LLC
19111 North Dallas Parkway, Suite 125
Dallas, TX 75287

Eric Zimmerman
Reflective Energy Solutions, LLC
One University Plaza, Suite 407
Hackensack, NJ 07601

David Fleming
Reliable Power LLC
1040 Avenue of the Americas, 24th Fl.
New York, NY 10018

Reliant Energy Northeast LLC
120 Fannin St., 5th Floor
Houston, TX 77002

Resource Energy Systems LLC
11200 Westheimer Rd., Suite 520
Houston, TX 77042-3227

Respond Power LLC
100 Dutch Hill Rd., Suite 310
Orangeburg, NY 10962

Frank Richards
Richards Energy Group Inc.
781 South Chiques Rd.
Manheim, PA 17545-9135

James J. Rosenthal
Rosenthal Energy Advisors
1412 Main St., Suite 2100
Dallas, TX 75202

David Wiers
Satori Enterprises LLC d/b/a
Satori Energy
815 West Superior St. #1
Chicago, IL 60642

School Power Inc.
315 Fuller Rd.
Box 686
Dalton, PA 18414

Secure Energy Solutions LLC
12 Somers Rd.
East Longmeadow, MA 01028

Shipley Energy Company
550 East King Street
PO Box 946
York, PA 17403

ScourceOne Inc (DE) d/b/a
SourceOne Energy Inc.
132 Canal Street
Boston, MA 02114

South Jersey Energy Co.
One North White Horse Pike
PO Box 152
Hammonton, NJ 08037

Spark Energy LP
3010 Briar Park Dr., Suite 550
Houston, TX 77042

Ruzhdi Dauti
Starion Energy PA Inc.
220 Main St., South Suite 206
Southbury, CT 06488

Stream Energy Pennsylvania, LLC
PO Box 7287
Philadelphia, PA 19101-7287

Ron Taglieri
Summit Energy Services Inc.
10350 Ormsby Park Place, Suite 400
Louisville, KY 40223

Superior Plus Energy Services LLC
224 Valley Creek Blvd.
Exton, PA 19341

Kenneth E. Ryan
Switch Energy
581 Boylston St., Suite 304
Boston, MA 02116

A. Parks Cobb, Jr.
SYR Solutions
14027 Memorial Drive #425
Houston, TX 77079

Taylor Consulting and Contracting LLC
625 Main St.
Avoca, PA 18641

Technology Resource Solutions Inc.
d/b/a PAETEC
PO Box 6121
Schenectady, NY 12306

TES Energy Services LP
17480 Dallas Parkway, Suite 200
Dallas, TX 75287

Steve Wilson
Texzon Utilities Ltd
204 N. I-35, Suite A
Red Oak, TX 75154

TFS Energy Solutions LLC d/b/a
Tradition Energy
25 Mall Road, Suite 403
Burlington, MA 01803

Joseph P. Coyle Jr.
The GALT Company LLC
1412 Walter Street, Suite 202
Bethlehem, PA 18015

Mike Stumpo
The Legacy Energy Group LLC
d/b/a Legacy Energy
32 Waterloo Street, 3rd Fl.
Warrenton, VA 20186

The Loyalton Group
1313 N. Atlantic St., Suite 5000
Spokane, WA 99201

Chuck Dobbins
The Pennsylvania State University
155G Office of Physical Plant
University Park, PA 16802

Richard Harris
The Pennsylvania State University
113 Office of Physical Plant
University Park, PA 16802

Ian Salada
The Pennsylvania State University
101P Office of Physical Plant
University Park, PA 16802

Cynthia Baldwin
The Pennsylvania State University
Office of General Counsel 108 Old Main
University Park, PA 16802

Mike Prinkey PE
The Pennsylvania State University
152M Office of Physical Plant
University Park, PA 16802

Greg Bass Director
The Royal Bank of Scotland PLC
401 West A St., Suite 500
San Diego, CA 92101

John Tobelmann
Tobelmann Energy Brokers Inc.
5401 Lister Court
Chester Springs, PA 19425

Topco Associates d/b/a
Topsource LLC
350 Granite St., Third Fl.
Braintree, MA 02184

Total Energy Resources LLC
150 East Boca Raton Rd.
Boca Raton, FL 33432

Trieagle Energy LLP
PO Box 131615
The Woodlands, TX 77393-1615

Tod Sherman, President
Tybec Energy Management Specialists Inc.
12 Royal Dr.
Lititz, PA 17543

U.S. Sun Energy Inc.
1599 270th Ave.
Mora, MN 55051

Usource LLC
6 Liberty Lane West
Hampton NH 14437

UGI Energy Services Inc.
1 Meridian Blvd., Suite 2C01
Wyomissing, PA 19610

Bob H. Schiff
Ultimate Energy Advisors LLC
6922 Flint Cove Dr.
Dallas, TX 75248

Unified Energy Alliance LLC
PO Box 211
Arendtsville, PA 17303

Michael Harris
Unified Energy Services LLC
3900 Esses Suite 750
Houston, TX 77027

US Energy Partners LLC
d/b/a PAETEC Energy Markets
600 Willow Brook Office Park
Fairport, NY 14450

Steve A. Bobick
Utilitech Inc.
3020 Penn Ave.
West Lawn, PA 19609

Utilities Analyses Inc.
450 Old Peachtree Rd. NW, Suite 103
Atlanta, GA 30024

Utilities Rates Analysts
220 South 17th St.
Camp Hill, PA 17011

Thomas Fitzgerald
Verde Energy USA Inc.
101 Merritt 7, Third Floor
Norwalk CT 06851

Geraldine B. Hailes
Washington Gas Energy Services
13865 Sunrise Valley Dr., Suite 200
Herndon, VA 20171-4661

Kevin Smith
Winstar Solutions LLC
6009 Mendota Dr.
Plano, TX 75024

Carolyn Oldenburg, Esq.
World Energy Solutions Inc.
446 Main St.
Worcester, ME 01608

Worley & Obetz, Inc.
85 White Oak Road
PO Box 429
Manheim, PA 17545

Robert Cross
Xencom Green Energy LLC
1609 Precision Dr., Suite 3000
Plano, TX 75074

John Blasis
Your Chloice Energy LLC
1616 Batchelor Court
Dunedin, FL 34698

Carl R. Shultz, Esq.

Dated: December 19, 2011

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Joint Petition Of Metropolitan Edison	:	
Company, Pennsylvania Electric Company,	:	Docket No. P-2011-2273650
Pennsylvania Power Company and West	:	Docket No. P-2011-2273668
Penn Power Company for Approval of	:	Docket No. P-2011-2273669
Their Default Service Programs		Docket No. P-2011-2273670

THE RETAIL ENERGY SUPPLY ASSOCIATION'S
PETITION TO INTERVENE

Pursuant to 52 Pa. Code §§ 5.72-5.75, the public notices filed in the Pennsylvania Bulletin on December 3, 2011 and the Prehearing Conference Order dated November 30, 2011, the Retail Energy Supply Association ("RESA")[1] petitions to intervene in the Joint Petition of Metropolitan Edison Company, Pennsylvania Electric Company, Pennsylvania Power Company and West Penn Power Company ("the Companies") for Approval of Their Default Service Programs ("DSP Petition"). In support of its intervention, RESA states as follows:

1. On November 17, 2011, the Companies filed a petition proposing to establish the terms and conditions under which they will procure default service suppliers, provide default service to non-shopping customers, satisfy requirements imposed by the Alternative Energy

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1 RESA's members include: Champion Energy Services, LLC; ConEdison *Solutions*; Constellation NewEnergy, Inc.; Direct Energy Services, LLC; Energetix, Inc.; Energy Plus Holdings, LLC; Exelon Energy Company; GDF SUEZ Energy Resources NA, Inc.; Green Mountain Energy Company; Hess Corporation; Integrys Energy Services, Inc.; Just Energy; Liberty Power; MC Squared Energy Services, LLC; Mint Energy, LLC; MXenergy; NextEra Energy Services; Noble Americas Energy Solutions LLC; PPL EnergyPlus, LLC; Reliant and TriEagle Energy, L.P.. The comments expressed in this filing represent the position of RESA as an organization but may not represent the views of any particular member of RESA.

Portfolio Standards Act and recover all associated costs on a full and current basis for the period from June 1, 2013 through May 31, 2015.

2. By public notices published in the Pennsylvania Bulletin on December 3, 2011, the Commission established a deadline of December 19, 2011 for formal protests, petitions to intervene and answers. By Prehearing Conference Order dated November 30, 2011, Administrative Law Judge Elizabeth H. Barnes scheduled an Initial Prehearing Conference for December 22, 2011 and directed parties to serve copies of their Prehearing Conference Memorandum on or before December 20, 2011. Subject to the granting of this Petition to Intervene, RESA is simultaneously filing its Prehearing Conference Memorandum.

3. RESA is a trade association of power marketers, independent power producers, and a broad range of companies within the Mid-Atlantic marketplace, each of whom support the electric services industry and seek to develop a more competitive power industry. RESA members are licensed to sell electric energy in the markets of Pennsylvania's major EDCs, including the service territories of the Companies.

4. RESA's attorneys in this matter are:

Daniel Clearfield, Esquire
Deanne M. O'Dell, Esquire
Carl R. Shultz, Esquire
Eckert Seamans Cherin & Mellott, LLC
213 Market St., 8th Floor
P.O. Box 1248
Harrisburg, PA 17101
717.237.6000
Fax 717.237.6019
dclearfield@eckertseamans.com
dodell@eckertseamans.com
cshultz@eckertseamans.com

5. The Commission's regulations allow intervention where a person has an interest in the proceeding which may be directly affected and which is not adequately represented by

existing parties, and as to which the person may be bound by the action of the Commission in the proceeding. 52 Pa. Code § 5.72(a)(2). Intervention is also permitted where participation of the person may be in the public interest. 52 Pa. Code § 5.72(a)(3). A "person" includes a corporation and an association. 52 Pa. Code § 1.8.

6. RESA meets the standards for intervention set forth in 52 Pa. Code § 5.72(a). As an organization whose members include competitive electric generation suppliers ("EGSs") licensed to do business in the Companies' service territories, RESA has interests that will be directly affected by this proceeding. The ability of RESA's members to provide electric supply to retail customers in the Companies' service territories will be specifically and substantially affected by the outcome of this proceeding, which will establish the terms and conditions under which the Companies will acquire electric supply to serve its Default Service load from June 1, 2013 through May 31, 2015and, thus, the rates against which RESA members must compete to sell electricity to retail customers in the Companies' service territories. In addition, the petitions propose to establish various retail market markets such as an opt-in auction, customer referral program and a time of use program in which EGS participation is necessary.

7. RESA's interests in this proceeding are unique from and not adequately represented by other parties that may seek to intervene, including individual EGSs or other organizations interested in electric competition in Pennsylvania in general and in the Companies' service territories in particular. This is because RESA represents the interests of a diverse and broad group of electric generation suppliers in general, and not the interests of any individual member.

8. RESA's members will be bound by the action of the Commission in this proceeding, which will determine the Companies' default service rates, terms and conditions for

beginning June 2013 as well as the terms and conditions for the various retail market enhancement programs proposed by the Companies..

9. RESA's intervention is in the public interest. RESA's participation will enable it to contribute the unique perspectives and insights of a trade association representing multiple EGSs and complete presentation of the issues to be addressed in this proceeding. It should be noted that RESA actively participated in most of the default service proceedings that developed the current default service plans for each of the companies. RESA has also been an active participate in the Commission's Retail Market Investigation at docket number I-2011-223752 which has been investigating most of the issues to be addressed in this proceeding.

10. RESA's list of presently identified issues is set forth in its Prehearing Conference Memorandum, which is incorporated herein by reference. Due to the early stage of this proceeding, RESA reserves the right to raise and address issues identified through its continued review and analysis of the Companies' filing (and related information), or other issues raised by other parties.

WHEREFORE, RESA respectfully requests that the Commission grant RESA's Petition to Intervene.

Respectfully submitted,

Daniel Clearfield, Esquire
Attorney ID 26183
Deanne M. O'Dell, Esquire
Attorney ID 81064
Carl R. Shultz, Esquire
Attorney ID 70328
Eckert Seamans Cherin & Mellott, LLC
213 Market St., 8th Floor
Harrisburg, PA 17101
717.237.6000
Fax 717.237.6019
Attorneys for Retail Energy Supply Association

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