



100 Pine Street • PO Box 1166 • Harrisburg, PA 17108-1166
Tel: 717.232.8000 • Fax: 717.237.5300

Teresa K. Schmittberger
Direct Dial: 717.237.5270
Direct Fax: 717.260.1688
tschmittberger@mwn.com

December 19, 2011

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor
Harrisburg, PA 17120

VIA HAND DELIVERY

RE: Joint Petition of Metropolitan Edison Company, Pennsylvania Electric Company, Pennsylvania Power Company, and West Penn Power Company for Approval of Their Default Service Plans; Dockets No. P-2011-2273650, P-2011-2273668 and P-2011-2273669

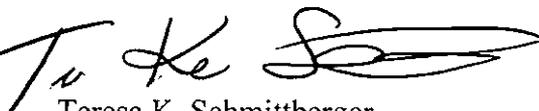
Dear Secretary Chiavetta:

Enclosed for filing with the Pennsylvania Public Utility Commission are the original and three (3) copies of the Petition to Intervene and Answer in Opposition of Med-Ed Industrial Users Group ("MEIUG"), Penelec Industrial Customer Alliance ("PICA") and Penn Power Users Group ("PPUG") in the above-referenced proceedings.

As shown by the attached Certificate of Service, all parties to this proceeding are being duly served. Please date stamp the extra copy of this transmittal letter and Petition, and kindly return them to our messenger for our filing purposes.

Very truly yours,

McNEES WALLACE & NURICK LLC

By 
Teresa K. Schmittberger

Counsel to Met-Ed Industrial Users Group,
Penelec Industrial Customer Alliance and
Penn Power Users Group

RECEIVED
2011 DEC 19 PM 3:22
PA PUC
SECRETARY'S BUREAU

TKS/sar
Enclosures

c: Administrative Law Judge Elizabeth H. Barnes (via e-mail and hand delivery)
Certificate of Service

www.mwn.com

HARRISBURG, PA • LANCASTER, PA • STATE COLLEGE, PA • HAZLETON, PA • COLUMBUS, OH • WASHINGTON, DC

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Joint Petition of Metropolitan Edison :
Company, Pennsylvania Electric Company, : Docket Nos. P-2011-2273650;
Pennsylvania Power Company, and West : P-2011-2273668;
Penn Power Company for Approval of : P-2011-2273669
Their Default Service Plans :

**PETITION TO INTERVENE AND
ANSWER IN PARTIAL OPPOSITION OF
MET-ED INDUSTRIAL USERS GROUP,
PENELEC INDUSTRIAL CUSTOMER ALLIANCE,
AND PENN POWER USERS GROUP**

RECEIVED
2011 DEC 19 PM 3:22
PA PUC
SECRETARY'S BUREAU

Pursuant to Sections 5.71 through 5.74 of the Pennsylvania Public Utility Commission's ("PUC" or "Commission") Regulations, 52 Pa. Code §§ 5.71 - 5.74, the Met-Ed Industrial Users Group ("MEIUG"), Penelec Industrial Customer Alliance ("PICA"), and Penn Power Users Group ("PPUG") hereby file this Petition to Intervene in the above-captioned proceeding. In addition, pursuant to Section 5.61(a) of the Commission's Regulations, 52 Pa. Code § 5.61(a), MEIUG, PICA, and PPUG hereby file this Answer opposing¹ certain aspects of the above-captioned Joint Petition ("Joint Petition") of Metropolitan Edison Company ("Met-Ed"), Pennsylvania Electric Company ("Penelec"), Pennsylvania Power Company ("Penn Power"), and West Penn Power Company ("West Penn") (collectively, "Companies"),² all FirstEnergy Corporation ("FirstEnergy") wholly-owned subsidiary companies.

In the Joint Petition, the Companies set forth a proposed plan for the terms and conditions under which the Companies would supply default service from June 1, 2013 through May 31, 2015. The proposed default service plan ("DSP") includes aspects that would apply to all retail

¹ Alternatively, the MEIUG/PICA/PPUG filing should be treated by the Commission as a Complaint against the Companies' proposal pursuant to Section 5.22 of the Commission's Regulations. See 52 Pa. Code § 5.22.

² Although the Joint Petition addresses default service for all four Companies, this Answer and Petition focus on Met-Ed, Penelec, and Penn Power specific issues.

customers in the Companies' service territories, regardless of whether they receive default service. As explained herein, certain aspects of the proposed DSP raise issues of serious concern to, and could adversely affect, Large Commercial and Industrial ("C&I") customers in their respective service territories. In addition, the proposed DSP includes mechanisms that are inconsistent with the Commission's Regulations, Act 129 requirements, and competitive market development.

In support of its Petition to Intervene and Answer in Partial Opposition, MEIUG, PICA, and PPUG assert as follows:

I. PETITION TO INTERVENE

1. MEIUG, PICA, and PPUG are *ad hoc* associations of energy-intensive commercial and industrial customers receiving electric service in Met-Ed's, Penelec's, and Penn Power's service territories. MEIUG, PICA, and PPUG have been active in many Commission proceedings addressing the terms and conditions of the Companies' service.³

2. Together, MEIUG, PICA, and PPUG members consume over 2.1 billion kWh of electricity on an annual basis. MEIUG members receive service under Met-Ed's GS-Large, GP, and TP rate schedules; PICA members receive service under Penelec's GS-Large, GP, and LP rate schedules; and PPUG members receive service under Penn Power's GT rate schedule. For purposes of this proceeding, MEIUG, PICA, and PPUG membership is listed on the attached Appendices "A," "B," and "C," respectively. MEIUG, PICA, and PPUG will update the appendices during the course of this proceeding as needed to reflect changes in membership.

3. As users of substantial volumes of electricity, MEIUG, PICA, and PPUG members are directly impacted by changes to the terms and conditions of their electricity service,

³ For purposes of Sections I and II, "Companies" shall refer to Met-Ed, Penelec, and Penn Power. At this time, MEIUG, PICA, and PPUG do not have any comments with respect to the proposed modifications to West Penn's default service.

and thus, are profoundly concerned by the Companies' proposed DSP. The Commission's final disposition of the Companies' Joint Petition will directly affect the rates that the Companies impose on all MEIUG, PICA, and PPUG members, whether or not they receive default service. For that reason, if the DSP terms are adopted as proposed, there will likely be a serious adverse impact on customers receiving competitive supply, as well as an impact on those customers who may choose to receive service via the Companies' default service options. As some of the Companies' largest customers, MEIUG, PICA, and PPUG members are in a unique position to comment to the Commission on the effect of the Companies' proposed DSP on Large C&I customers.

4. MEIUG, PICA, and PPUG members have an interest in this proceeding that is not represented by any other party of record. Thus, MEIUG, PICA, and PPUG satisfy the standards for intervention under Section 5.72 of the Commission's Regulations. 52 Pa. Code § 5.72.

5. The names and address of attorneys of MEIUG, PICA, and PPUG are:

Charis Mincavage (Pa. I.D. No. 82039)
Vasiliki Karandrikas (Pa. I.D. No. 89711)
Teresa K. Schmittberger (Pa. I.D. No. 311082)
McNees Wallace & Nurick LLC
100 Pine Street
P.O. Box 1166
Harrisburg, PA 17108
Phone: (717) 232-8000
Fax: (717) 260-1666
cmincavage@mwn.com
tschmittberger@mwn.com

MEIUG, PICA, and PPUG request that the names and address of their attorneys be added to the Commission's and all parties' service lists. All correspondence in this proceeding from the Commission should be directed to the attention of Charis Mincavage at the address listed above.

II. ANSWER

6. A full Commission investigation is warranted, including evidentiary hearings, because the Companies' filing alone cannot be determined to be in compliance with Section 2807(e) of the Public Utility Code. 66 Pa. C.S. § 2807(e). MEIUG, PICA, and PPUG oppose several aspects of the proposed DSP as unreasonable, unfair, unjust, and in non-compliance with the Public Utility Code. *See, e.g.*, 66 Pa. C.S. § 2807(e)(3). After a preliminary review of the Companies' Joint Petition and without the benefit of the Companies' testimony, MEIUG, PICA, and PPUG believe the Commission should specifically consider the following issues in the proceeding: (1) the Companies' proposal to recover certain transmission costs through non-bypassable riders; (2) the Companies' proposal to revise the current solar photovoltaic alternative energy credit procurement and recover additional costs through non-bypassable riders; and (3) the Companies' proposal to impose a Market Adjustment Charge on residential and commercial customers to encourage shopping. MEIUG, PICA, and PPUG also reserve the right to raise additional issues of concern during the course of the proceeding once more information is provided by the Companies regarding the specific terms for Large C&I default service.

A. By Proposing To Include NITS, RTEP, and Transmission Expansion Costs in Non-Bypassable Default Service Support Riders, the Companies Have Failed To Provide Any Basis for Waiver of the Commission's Default Service Regulations or Offer Customer Protections To Avoid Over-collection of These Costs.

7. All of the Companies are proposing to include non-market based Services Transmission Charges in their non-bypassable Default Service Support ("DSS") Riders. Under this proposed approach, electric generation suppliers ("EGSs") would no longer collect transmission charges from shopping customers. Moreover, the Companies would remove network integration transmission service ("NITS"), regional transmission expansion plan ("RTEP"), and transmission expansion costs from their current Price to Compare ("PTC"). Joint

Petition at 15. Instead, the Joint Petition provides that these charges will be recovered by Met-Ed, Penelec, and Penn Power through their non-bypassable Default Service Support Riders through a flat per-kWh rate design for residential and small commercial customers and a demand-based rate design for Large C&I customers. Joint Petition at 17-18. In order to remove these charges from competitive supply arrangements, the Companies request that the Commission grant a waiver of PUC Regulations at 52 Pa. Code §§ 54.182 and 54.187.

8. The Commission's Regulations require EGSs to be responsible for collecting the NITS, RTEP, and transmission expansion costs from retail customers. Without any explanation, the Companies request assumption of this role for customers receiving competitive supply. This proposal is directly inconsistent with the Commission's Regulations regarding rate design and PTC, which state that transmission service charges are to be included within the PTC. 52 Pa. Code §§ 54.182 and 54.187(e). Because other Pennsylvania EDCs include transmission costs in their PTC, allowing the Companies to collect such transmission costs through a non-bypassable DSS charge will lead to a patchwork of different requirements across the Commonwealth. Allowing non-standard default service rules relative to the PTC may serve to erect barriers to entry for EGSs in the FirstEnergy Companies' service territories in Pennsylvania. Including transmission costs in the PTC is embedded in customers' and suppliers' business practices alike and should not be altered without a compelling demonstration of public interest benefit. As the Companies provide no rationale for this proposed diversion from fundamental Commission Regulations, no basis exists to grant a waiver of the Commission's Regulations at 52 Pa. Code §§ 54.182 and § 54.187.

9. Furthermore, even if the Companies were to demonstrate a compelling public interest benefit, their proposal lacks a transition plan for including these charges in DSS Riders

without risking contractual inconsistencies among Pennsylvania EDC territories and duplicative charges to customers for transmission service. Currently, supplier contracts in the Met-Ed, Penelec, and Penn Power territories include all charges for transmission; thus, removal of these charges from EGS contracts and assessing these charges to customers through non-bypassable riders needlessly interferes with numerous competitive retail supply contracts. In addition, these retail contracts may extend beyond the June 1, 2013 implementation date for the DSPs. Thus, if the Companies begin recovering these charges through their DSS Riders on June 1, 2013, at a minimum, customers will be required to undertake the cost and risk of renegotiating their EGS contracts to remove NITS, RTEP, and transmission expansion costs and, at worse, customers would be charged twice for transmission by the EGS and the EDC. In addition, the Companies have failed to address the customer education mismatch where some service territories include transmission in their PTCs and others do not. This issue can be especially important for those larger customers that may have facilities located in several different EDC service territories throughout Pennsylvania. For the above-stated reasons, the Companies' proposal is deficient and should not be adopted.

B. The Commission Should Consider the Impact of the Companies' Proposal to Procure 60% Fewer Solar Photovoltaic Alternative Energy Credits for Commercial and Industrial Customers.

10. In the Joint Petition, the Companies propose to conduct RFPs to bid out the procurement of 40% of their Solar Photovoltaic Alternative Energy Credits ("SPAECs") for the next ten years through long-term contracts. Joint Petition at 11. Currently, Met-Ed, Penelec, and Penn Power acquire 100% of the SPAECs required for their respective loads. In other words, the Companies currently procure enough solar credits to meet the requirements of both default and shopping customers in their applicable service territories. Although Met-Ed, Penelec, and Penn Power are planning to procure the remaining 60% of SPAECs for residential customers through

short-term contracts, *id.*, EGSs will be required to procure the remaining 60% for C&I customers through competitive supply contracts. The Companies will also collect carrying costs from customers for banked SPAECs through their non-bypassable Solar Photovoltaic Requirements Charge ("SPVRC") Riders on a monthly basis. *Id.* at 18.

11. The Companies note that this 40% SPAEC procurement requirement is consistent with the terms within the Allegheny-FirstEnergy Joint Petition for Partial Settlement ("Settlement"). *See* Docket Nos. A-2010-2176520; A-2010-2176732. What the Companies fail to acknowledge, however, is that the Settlement included 40% SPAEC procurement as a baseline and did not preclude Met-Ed, Penelec, and Penn Power from procuring the remaining 60%, through short-term contracts (as the Companies are planning to do for residential customers). Thus, the Companies have the option of continuing to procure up to 100% of SPAECs for all customers and recovering the costs through their SPVRC Riders.

12. Although the Companies bear the burden of proof in this proceeding, the Companies do not explain the reasoning behind their 60% reduction in SPAEC procurement for C&I customers. Moreover, the Companies fail to address how this change could significantly impact customers currently receiving supply service from EGSs. Because the Companies' original DSP provided that Met-Ed, Penelec, and Penn Power would meet their entirety of both default and shopping customers solar requirements, customers receiving retail supply service did not have to address the costs of solar credits as part of any negotiations with EGSs. Now, these customers may need to need to revise and/or renegotiate their supply contracts with their EGSs in order to include SPAEC costs. Because these revisions will include the costs of SPAECs and SPAEC procurement, the cost of electricity will likely increase for shopping customers. Moreover, a customer education initiative would need to be developed to ensure that all retail

customers are informed of the change in purchasing rules. It is also unclear, without additional information from the Companies, how the collection for SPAEC costs under the SPVRC Rider will be adjusted for residential customers, who will pay for all SPAECs through this Rider, versus C&I customers, who will theoretically be paying for 40% of their SPAECs through this Rider and 60% through separate agreements.

13. Furthermore, in order to implement these new procurement procedures, the Companies will begin collecting carrying costs for banked SPAECs from all customers through their non-bypassable SPVRC Riders. The Companies do not explain within their Joint Petition, however, why carrying costs become necessary under the new procedures. Because this proposed SPAEC procurement plan will result in additional carrying costs for both default service and competitive supply customers under SPVRC Riders, this proposal may not advance the goal of "least cost over time" default service within Act 129. 66 Pa. C.S. § 2807(e)(3.7). Without information about the need for these revised procurement procedures, the addition of strong customer protections to avoid increased SPAEC procurement costs for customers, and a robust customer education program, the proposal for 40% SPAEC procurement by the Companies should not be approved.

C. The Companies' Proposal To Impose an Adder for Residential and Commercial Classes, Inflating the Cost of Default Service, Is Unjust and Unreasonable.

14. The Companies propose establishing a Market Adjustment Charge ("MAC") adder for residential and small commercial customers to increase the price of default service by \$.005 per kWh. Joint Petition at 16. The Joint Petition states that the MAC adder will "reasonably compensate the Companies for the obligation and attendant risk of procuring electric power for customers who choose not to shop," and "have the collateral benefit of enhancing

competition by creating additional 'headroom' beneath the price-to-compare for competitive offers." *Id.* at 17.

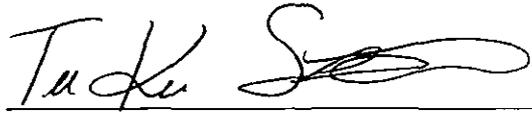
15. Although MEIUG, PICA, and PPUG consist of Large C&I customers, rather than residential and small commercial customers, MEIUG, PICA, and PPUG are seriously concerned that the Companies' proposal to charge customers an additional amount with the objective of making competitive supply more attractive will have far-reaching effects in the market. Pennsylvania's restructuring effort was undertaken in 1996 with the objective of reducing electricity costs to customers and improving Pennsylvania businesses' ability to remain competitive; in the current economic environment, the importance of these public interest objectives cannot be overstated. Furthermore, as the Industrial Customer Groups, including MEIUG, PICA, and PPUG, stated in their Comments dated June 3, 2011, in Docket Number I-2011-2237952, "[a]rtificially boosting shopping levels . . . is not consistent with true competition or success under the Competition Act." Accordingly, a fixed adder artificially inflating the price of default service is an inappropriate mechanism for encouraging switching.

III. CONCLUSION

WHEREFORE, for the reasons stated above, the Met-Ed Industrial Users Group, Penelec Industrial Customer Alliance, and Penn Power Users Group respectfully request that the Commission: (1) grant this Petition to Intervene, providing Met-Ed Industrial Users Group, Penelec Industrial Customer Alliance, and Penn Power Users Group with full-party status in this proceeding; (2) deny the Joint Petition of Metropolitan Edison Company, Pennsylvania Electric Company, Pennsylvania Power Company, and West Penn Power Company for Approval of their Default Service Plans absent modification or the provision of additional information as discussed herein; and (3) provide other such relief as it deems necessary.

Respectfully submitted,

McNEES WALLACE & NURICK LLC

By 

Charis Mincavage (Pa. I.D. No. 82039)
Vasiliki Karandrikas (Pa. I.D. No. 89711)
Teresa K. Schmittberger (Pa. I.D. No. 311082)
100 Pine Street
P. O. Box 1166
Harrisburg, PA 17108-1166
Phone: (717) 232-8000
Fax: (717) 237-5300

Counsel to the Met-Ed Industrial Users Group,
Penelec Industrial Customer Alliance, and Penn
Power Users Group

Dated: December 19, 2011

APPENDIX A

MET-ED INDUSTRIAL USERS GROUP

Air Liquide Industrial U.S. LP
Carpenter Technology Corporation
Dixie Consumer Products, LLC, Lehigh Valley
East Penn Manufacturing Company
Exide Technologies, Inc.
Farmers Pride, Inc.
Glen-Gery Corporation
Harley-Davidson Motor Company - York Division
Knouse Foods Cooperative, Inc.
Magnesita Refractories Co.
PPG Industries, Inc.
RH Sheppard Co., Inc. - Foundry Division
Royal Green LLC
Sweet Street Desserts, Inc.
Tray-Pak Corporation

RECEIVED

2011 DEC 19 PM 3:22

PAFUC
SECRETARY'S BUREAU

APPENDIX B

PENELEC INDUSTRIAL CUSTOMER ALLIANCE

American Refining Group Inc.
Appleton Papers Inc.
E.I. du Pont de Nemours & Co., Inc.
Electralloy, a G.O. Carlson, Inc., Co.
Ellwood National Steel
Erie Forge & Steel, Inc.
Glen-Gery Corporation
Pittsburgh Glass Works
Procter & Gamble Paper Products Company
Sheetz, Inc.
Standard Steel
Team Ten, LLC - American Eagle Paper Mills
The Plastek Group
U.S. Silica Company
Wegmans Food Markets, Inc.

RECEIVED

2011 DEC 19 PM 3:22

PA PUC
SECRETARY'S BUREAU

APPENDIX C

PENN POWER USERS GROUP

Ellwood Quality Steel

RECEIVED

2011 DEC 19 PM 3:22

**PA PUC
SECRETARY'S BUREAU**

CERTIFICATE OF SERVICE

I hereby certify that I am this day serving a true copy of the foregoing document upon the participants listed below in accordance with the requirements of 52 Pa. Code Section 1.54 (relating to service by a participant).

VIA E-MAIL AND FIRST-CLASS MAIL

Irwin A. Poposky
Consumer Advocate
Office of Consumer Advocate
555 Walnut Street
5th Floor, Forum Place
Harrisburg, PA 17101-1923
spopowsky@paoca.org

Johnnie E. Simms
Director
Bureau of Investigation & Enforcement
Pennsylvania Public Utility Commission
Commerce Keystone Building
400 North Street, 2nd Floor
P.O. Box 3265
Harrisburg, PA 17105-3265
josimms@pa.gov

Steven C. Gray, Esq.
Office of Small Business Advocate
1102 Commerce Building
300 North Second Street
Harrisburg, PA 17101
sgray@state.pa.us

Bradley A. Bingaman
Tori L. Giesler
FirstEnergy Service Company
2800 Pottsville Pike
P.O. Box 16001
Reading, PA 19612-6001
bbingaman@firstenergycorp.com

Thomas P. Gadsden
Kenneth M. Kulak
Anthony D. DeCusatis
Catherine G. Vasudevan
Morgan Lewis & Bockius LLP
1701 Market Street
Philadelphia, PA 19103-2921
tgadsden@morganlewis.com

Daniel Clearfield
Deanne M. O'Dell
Eckert Seamans Cherin & Mellott, LLC
213 Market Street, 8th Floor
Harrisburg, PA 17101
dclearfield@eckertseamans.com
dodell@eckertseamans.com

Thomas J. Sniscak
Hawke McKeon & Sniscak LLP
100 North 10th Street
P.O. Box 1778
Harrisburg, PA 17105
tjsniscak@hmslegal.com

Cynthia Baldwin
Vice President & General Counsel
The Pennsylvania State University
Office of the General Counsel
108 Old Main
University Park, PA 16802
cab71@psu.edu

SECRETARY'S BUREAU
2011 DEC 19 PM 3:23
RECEIVED

Certificate of Service

Dockets No. P-2011-2273650, P-2011-2273668 and P-2011-2273669

Page 2

Ian Salda
Manager, Engineering Services
The Pennsylvania State University
101P Office of Physical Plant
University Park, PA 16802
ims101@mw.opp.psu.edu

Mike Prinkey, P.E.
Energy Engineer
The Pennsylvania State University
152M Office of Physical Plant
University Park, PA 16802
mip103@psu.edu

Richard Harris
Utility Engineer
The Pennsylvania State University
113 Office of Physical Plant
University Park, PA 16802
Rsh3@nw.opp.psu.edu

James L. Crist
Lumen Group, Inc.
4226 Yarmouth Drive, Suite 101
Allison Park, PA 15101
jlcris@aol.com

Steve Pincus
Assistant General Counsel
PJM Interconnection, LLC
Valley Forge Corporate Center
955 Jefferson Avenue
Norristown, PA 19403-2497
pincus@pjm.com

Chuck Dobbins
Utility Engineer
The Pennsylvania State University
155G Office of Physical Plant
University Park, PA 16802
ccd10@psu.edu

Rob Cooper, P.E.
Director, Energy and Engineering
The Pennsylvania State University
208 Office of Physical Plant
University Park, PA 16802
rec3@psu.edu

VIA FIRST-CLASS MAIL

Acclaim Energy Advisors
Two Riverway
Suite 800
Houston, TX 77056

Affinity Energy Management, LLC
220 Cherry Blossom Place
Hockessin, DE 19707

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

Allegheny Energy Supply Co, LLC
800 Cabin Hill Drive
Greensburg, PA 15601

Affiliated Power Purchasers, Inc.
224 Philip Morris Drive
Suite 402
Salisbury, MD 21804

AlphaBuyer, LLC
1410 Russell Road
Suite 102
Paoli, PA 19301

Certificate of Service

Dockets No. P-2011-2273650, P-2011-2273668 and P-2011-2273669

Page 3

AMERESCO
111 Speen Street
Suite 410
Framingham, MA 01701

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

American Power Partners, LLC
8205 Main Street
Suite 11
Buffalo, NY 14221

American PowerNet Management, LP
45 Commerce Drive
Wyomissing, PA 19610

Anthracite Power & Light Company
10 Gilberton Road
Gilberton, PA 17934

AOBA Alliance, Inc.
1050 17th Street NW
Suite 300
Washington, DC 20036

AP Gas & Electric (PA), LLC, d/b/a
APG&E
6161 Savoy Drive
Suite 500
Houston, TX 77036

APN Starfirst, LP
45 Commerce Dr
Wyomissing, PA 19610

ArcelorMittal USA, LLC
900 Conshohocken Road
Conshohocken, PA 19428-1038

Aspen Energy Corporation
9550 Dublin Road
Suite C
Powell, OH 43065

Avalon Energy Services, LLC
5507 Lambeth Road
Bethesda, MD 20814

Blue Pilot Energy, LLC
250 Pilot Road
Suite 300
Las Vegas, NV 89119

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

Better Cost Control
2274 Washington Street
Newton, MA 02462

Bmark Energy, Inc.
791 Price Street
Suite 177
Pismo Beach, CA 93449

Brice Associates, LLC
477 Cafferty Road
Erwinna, PA 18920-9251

Brighten Energy LLC d/b/a Brighten
6555 Sierra Drive
Irving, TX 75039

BTU Energy, LLC
1702 Conowingo Road
Bel Air, MD 21014

Choice! Energy Services
5718 Westheimer Road
Suite 1310
Houston, TX 77057

Champion Energy Services, LLC
13831 NW Freeway
Suite 250
Houston, TX 77040

Clearview Electric, Inc.
PO Box 130659
Dallas, TX 75313

Certificate of Service

Dockets No. P-2011-2273650, P-2011-2273668 and P-2011-2273669

Page 4

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

Commercial Utility Consultants, Inc.
1556 McDaniel Drive
West Chester, PA 19380

Co-eXprise, Inc.
6021 Wallace Road Extension
Suite 300
Wexford, PA 15090

Community Energy, Inc.
Three Radnor Corporate Center
100 Matsonford Road
Suite 300
Radnor, PA 19087

Comperio Energy, LLC d/b/a ClearChoice
Energy
1500 Oxford Drive
Suite 210
Bethel Park, PA 15102

ConocoPhillips Company
P.O. Box 2197
Houston, TX 77252-2197

ConEdison Solutions, Inc.
701 Westchester Avenue
Suite 300 East
White Plains, NY 10604

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

Constellation NewEnergy, Inc.
100 Constellation Way
Suite 1200C
Baltimore, MD 21202

Current Choice, Inc.
46 Munroe Road
Lexington, MA 02421

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

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

Dash Energy, LLC
PO Box 131204
The Woodlands, TX 77393-1204

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

Direct Energy Business, LLC
1001 Liberty Avenue
Pittsburgh, PA 15222

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

Discount Energy Group, LLC
22809 Pacific Coast Highway #100
Malibu, CA 90265

DTE Energy Supply, Inc.
414 S. Main Street
Suite 200
Ann Arbor, MI 48104

DPL Energy Resources, Inc.
1065 Woodman Drive
Dayton, OH 45432

Duquesne Light Energy, LLC
441 Seventh Avenue (16-1)
Pittsburgh, PA 15219

Duke Energy Retail Sales, LLC
139 E. Fourth Street
Mail Drop EA600
Cincinnati, OH 45202

Certificate of Service

Dockets No. P-2011-2273650, P-2011-2273668 and P-2011-2273669

Page 5

Early Bird Power, LLC
One Adam Street
Milton, MA 02186

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

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

Energy Initiatives, Inc.
PO Box 479
Chester Heights, PA 19017

Eisenbach Consulting, LLC
821 Shiloh Road
B-300
Tyler, TX 75703

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

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

Energy Market Exchange, LLC
2825 Wilcrest Dr
Suite 656
Houston, TX 77042

Energetix, Inc.
50 Methodist Hill Drive
Suite 1500
Rochester, NY 14623

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

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

Energy Savers, Inc.
306 McKnight Park Drive
Pittsburgh, PA 15237-6534

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

EnerNoc, Inc.
101 Federal Street
Suite 1100
Boston, MA 02110

Energy Advantage, Inc.
501-5420 North Service Rd.
Burlington, Ontario L7L 6C7

Energy Trust, LLC
551 Fifth Avenue
37th Floor
New York, NY 10176

Energy Enablement, LLC
130 Tanglewood Drive
Wexford, PA 15090

FirstEnergy Solutions Corp.
341 White Pond Drive
Suite B3
Akron, OH 44320

Energy Edge Consulting
1183 Brittmoore
Suite 300
Houston, TX 77043

Exelon Energy Company
300 Exelon Way
Kennett Square, PA 19348

Certificate of Service

Dockets No. P-2011-2273650, P-2011-2273668 and P-2011-2273669

Page 6

GDF Suez Energy Resources NA, Inc.
1990 Post Oak Boulevard
Suite 1900
Houston, TX 77056

Gateway Energy Services Corporation
190 Welles Street
Suite 110
Forty Fort, PA 18704

Gexa Energy Pennsylvania, LLC
20 Greenway Plaza
Suite 600
Houston, PA 77046

Geary Energy, LLC
7712 South Yale Avenue
Tulsa, OK 74136

Global Energy Market Services, LLC
(GEMS)
2790 Mossie Blvd.
Suite 225
Monroeville, PA 15146

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

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

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

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

Good Energy, L.P.
232 Madison Avenue
Suite 405
New York, NY 10016

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

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

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

Hawk Energy Corp
2880 Bergey Road
Hatfield, PA 19440

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

HealthTrust Purchasing Group, LP
155 Franklin Road
Suite 400
Brentwood, TN 37027

Hess Corporation
One Hess Plaza
Woodbridge, NJ 07095

HOP Energy, LLC
4 W. Red Oak Lane
Suite 310
White Plains, NY 10604

Hospital Energy, LLC
696 Coleman Road
Middletown, CT 06457

Certificate of Service

Dockets No. P-2011-2273650, P-2011-2273668 and P-2011-2273669

Page 7

Hudson Energy Services, LLC
1650 Market Street
36th Floor
Philadelphia, PA 19103

I.C. Thomasson Associates, Inc.
2950 Kraft Drive
Suite 500
Nashville, TN 37204

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

Integrity Comm. of OH, LLC
d/b/a Integrity
5711 Grant Ave
Cleveland, OH 44105

Integrays Energy Services
Rosslyn Metro Center
Suite 1105
1700 Moore Street
Arlington, VA 22209

Intelligen Resources, LP
2100 W 7th Street
Fort Worth, TX 76107

Interstate Gas Marketing, Inc.
2018 South 6th Street
Indiana, PA 15701
InVado International, LLC
9826 E Washington Street
Chagrin Falls, OH 44023

InVado International LLC
9826 E Washington Street
Chagrin Falls, OH 44023

Kenneth E. Ryan
d/b/a Switch Energy
581 Boylston Street
Suite 305
Boston, MA 02116

Keystone Energy Consulting, LLC
200 Brush Run Road
Suite C
Greensburg, PA 15601-8757

Keytex Energy Solutions, LLC
200 Brush Run Road
Suite C
Greensburg, PA 15601-8757

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

LD Energy, LLC d/b/a LD Energy
11 West Passaic Street
Rochelle Park, NJ 07662-3225

Liberty Power Delaware, LLC
1901 W. Cypress Creek Rd
Suite 600
Ft. Lauderdale, FL 33309

Liberty Power Holdings
1901 W Cypress Creek Rd
Suite 600
Fort Lauderdale, FL 33309

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

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

Lower Electric, LLC
1307 Shermer Road
Northbrook, IL 60062

MAA Inc. d/b/a Industrial Energy
125 Strafford Avenue, Suite 300
Wayne, PA 19087

Certificate of Service

Dockets No. P-2011-2273650, P-2011-2273668 and P-2011-2273669

Page 8

Make The Switch USA, LLC
13 Great Meadow Road
Redding, CT 06896

MX Energy Electric, Inc.
P.O. Box 8127
Stamford, CT 06905-8127

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

National Energy Management, LLC
12407 N. Mo Pac Expressway
Suite 100-348
Austin, TX 78758

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

National Utility Services, Inc.
1 Maynard Drive
Park Ridge, NJ 07656-1879

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

Natures Current, LLC
95 Fairmont Avenue
Philadelphia, PA 19123

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

NextEra Energy Services Pennsylvania,
LLC
PO Box 14000
Juno Beach, FL 33408-0420

Mitchell Energy Management
610 Berwick Road
Wilmington, DE 19803-2204

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

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

North American Power and Gas, LLC
One Marshall Street
South Norwalk, CT 06854

Mondre Energy, Inc.
1800 John F. Kennedy Boulevard
Suite 1504
Philadelphia, PA 19103

North Shore Energy Consulting, LLC
423 Meadowview Drive
Sagamore Hills, OH 44067

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

Northeast Energy Partners, LLC
174 South Road
Enfield, CT 06082

Muirfield Energy, Inc.
5850 Venture Drive
Suite C
Dublin, OH 43017

NRGING LLC d/b/a Netgain Energy
Advisors
1775 Wiehle Avenue
Suite 310
Reston, VA 20190

Certificate of Service

Dockets No. P-2011-2273650, P-2011-2273668 and P-2011-2273669

Page 9

On-Demand Energy, Inc.
1 N Shore Ctr
Suite 101
Pittsburgh, PA 15212

Option One Energy , LLC
321 N. Clark Street
5th Floor
Chicago, IL 60654

Options Consulting Services
1331 Conant Street
Maumee, OH 43537

Palmco Power PA, LLC
1350 60 Street
Brooklyn, NY 11219

Paragon Advisors, LLC
1730 Park Street
Suite 100
Naperville, IL 60563

Patriot Energy Group, Inc.
1 Rounder Way
Suite 200
Burlington, MA 01803

Pepco Energy Services, Inc., d/b/a
PowerChoice
1300 North 17th Street
Suite 1600
Arlington, VA 22209

PES Brokers, Inc.
1305 FM 359
Suite H
Richmond, TX 77469

Planet Energy (Pennsylvania), Corp
10 Kingsbridge Garden Circle
Suite 800
Mississauga, ON L5R 3K6

Platinum Advertising II, LLC
P.O. Box 3223
Clearwater Beach, FL 33767

PowerBrokers, LLC d/b/a PB2 Texas, LLC
5440 Harvest Hill Rd.
Suite 260
Dallas, TX 75230

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

Premier Energy Group, LLC
1275 Bound Brook Road
Suite 6
Middlesex, NJ 08846

Premier Power Solutions, LLC
107 Breckenridge Street
Grove City, PA 16127

Price Point Energy
3320 Forest Road
Bethel Park, PA 15102

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

Provident Energy Consulting, LLC
107 Chelsey Drive
Suite 2
PO Box 49
Media, PA 19063

Public Power, LLC
39 Old Ridgebury Road
Suite 14
Danbury, CT 06810

Rapid Power Management, LLC
19111 N. Dallas Parkway
Suite 125
Dallas, TX 75287

Reflective Energy Solutions, LLC
1 University Plaza
#407
Hackensack, NJ 07601-6204

Certificate of Service

Dockets No. P-2011-2273650, P-2011-2273668 and P-2011-2273669

Page 10

Reliable Power, LLC
1040 Avenue of the Americas
New York, NY 10018

Reliant Energy Northeast, LLC
1201 Fannin Street
5th Floor
Houston, TX 77002

Rescom Energy, LLC
15 Prospect Street
Paramus, NJ 07652

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

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

Richards' Energy Group, Inc.
781 South Chiques Road
Manheim, PA 17545

Rosenthal Energy Advisors, Inc.
1412 Main Street
Suite 2100
Dallas, TX 75202

Satori Enterprises, LLC d/b/a Satori Energy
815 W. Superior St
Suite 1
Chicago, IL 60642

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

Secure Energy Solutions, LLC
12 Somers Road
East Longmeadow, MA 01028

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

SourceOne, 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 BriarPark Drive
Suite 550
Houston, TX 77042

Starion Energy PA, Inc.
220 Main Street South
Suite 206
Southbury, CT 06488

Stream Energy Pennsylvania, LLC (Ignite)
P.O. Box 7287
Philadelphia, PA 19101-7287

Summit Energy SVC d/b/a
Summit Energy SVC of KY
10350 Ornsby Park Place
Suite 400
Louisville, KY 40223

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

SYR Solutions, LP
14027 Memorial Drive
Suite 425
Houston, TX 77079

Certificate of Service

Dockets No. P-2011-2273650, P-2011-2273668 and P-2011-2273669

Page 11

Taylor Consulting and Contracting, LLC
625 Main Street
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

Texzon Utilities, Ltd.
204 N 1-35
Suite A
Red Oak, TX 75154

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

The Galt Company, LLC
1412 Walter Street
Suite 202
Bethlehem, PA 18015

The Legacy Energy Group, LLC d/b/a
Legacy Energy
32 Waterloo Street
Warrenton, VA 20186

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

The Royal Bank Scotland, PLC
401 West A Street
Suite 500
San Diego, CA 92101

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

Topco Associates d/b/a Topsource, LLC
350 Granite Steet
Third Floor
Braintree, MA 02184

Total Energy Resources, LLC
150 East Boca Raton Road
Boca Raton, FL 33432

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

Tybec Management Specialists, Inc.
12 Royal Drive
Lititz, PA 17543

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

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

Ultimate Energy Advisors, LLC
6922 Flintcove Drive
Dallas, TX 75248

Unified Energy Alliance, LLC
PO Box 211
Arendtsville, PA 17303

Unified Energy Services, LLC
3900 Essex
Suite 750
Houston, TX 77027

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

Certificate of Service

Dockets No. P-2011-2273650, P-2011-2273668 and P-2011-2273669

Page 12

Usource, LLC
325 West Road
Portsmouth, NH 03801

UtiliTech, Inc.
3020 Penn Avenue
West Lawn, PA 19609

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

Utilities Rate Analysts
220 South 17th Street
Camp Hill, PA 17011

Verde Energy USA, Inc.
101 Merritt 7
3rd Floor
Norwalk, CT 06851

Washington Gas Energy Services, Inc.
13865 Sunrise Valley Drive
Suite 200
Herndon, VA 20171

Winstar Solutions, LLC
6009 Mendota Drive
Plano, TX 75024

World Energy Solutions, Inc.
446 Main Street
Worcester, MA 01608

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

Xencom Green Energy, LLC
1609 Precision Drive
Suite 3000
Plano, TX 75074

Your Choice Energy, LLC
1616 Batchelor Court
Dunedin, FL 34698



Teresa K. Schmittberger

Counsel to Met-Ed Industrial Users Group,
Penelec Industrial Customer Alliance, and
Penn Power Users Group

Dates this 19th day of December, 2011, at Harrisburg, Pennsylvania