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December 20, 2011

VIA FEDERAL EXPRESS

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
P.O. Box 3265
400 North Street
Harrisburg, PA 17105-3265

RECEIVED

DEC 20 2011

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

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

Dear Secretary Chiavetta:

Enclosed for filing are an original and three copies of the: **(1) Prehearing Memorandum; and (2) Motion for Consolidation of Metropolitan Edison Company, Pennsylvania Electric Company, Pennsylvania Power Company and West Penn Power Company** in the above-captioned matter.

As evidenced by the Certificate of Service, copies of the foregoing documents have been served upon Administrative Law Judge Elizabeth H. Barnes and all active parties.

Pursuant to 52 Pa. Code §1.11(2), the enclosed documents shall be deemed filed on the date shown on the express delivery receipt attached to the delivery envelope.

Rosemary Chiavetta, Secretary
December 20, 2011
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Also enclosed is an additional copy of this letter and the foregoing documents which we request be date-stamped as evidence of filing and returned to us in the stamped, pre-addressed envelope provided.

Sincerely,



Thomas P. Gadsden

TPG/ap
Enclosures

c: Honorable Elizabeth H. Barnes (w/encls.)
 Administrative Law Judge
 Per Certificate of Service

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

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PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

| | | |
|---------------------------------------|---|-----------------------------------|
| JOINT PETITION OF METROPOLITAN | : | |
| EDISON COMPANY, PENNSYLVANIA | : | DOCKET NOS. P-2011-2273650 |
| ELECTRIC COMPANY, PENNSYLVANIA | : | P-2011-2273668 |
| POWER COMPANY AND WEST PENN | : | P-2011-2273669 |
| POWER COMPANY FOR APPROVAL OF | : | P-2011-2273670 |
| THEIR DEFAULT SERVICE PROGRAMS | : | |

**MOTION FOR CONSOLIDATION BY METROPOLITAN EDISON COMPANY,
PENNSYLVANIA ELECTRIC COMPANY, PENNSYLVANIA POWER COMPANY
AND WEST PENN POWER COMPANY**

Pursuant to 52 Pa. Code § 5.81, Metropolitan Edison Company (“Met-Ed”), Pennsylvania Electric Company (“Penelec”), Pennsylvania Power Company (“Penn Power”) and West Penn Power Company (“West Penn”) (each individually a “Company” and collectively, the “Companies”) hereby move that the four above-referenced proceedings be formally consolidated into a single proceeding. In support of their Motion, the Companies state as follows:

1. On November 17, 2011, the Companies filed the above-captioned Joint Petition requesting that the Pennsylvania Public Utility Commission (the “Commission”) approve their Default Service Programs (the “Program(s)”) for the period beginning June 1, 2013 through May 31, 2015. The Joint Petition was assigned four docket numbers, one for each Company: P-2011-2273650 (Met-Ed); P-2011-2273668 (Penelec); P-2011-2273669 (Penn Power); and P-2011-2273670 (West Penn).¹

2. The Companies’ proposed Programs contain coordinated procurement plans, contingency plans, rate design changes and tariffs, and retail market enhancements. In addition,

¹ The Joint Petition was assigned four docket numbers for compliance filings and other such administrative purposes.

the Companies have proposed a single set of master protocols and agreements for: (1) default service supply procurement; (2) solar alternative energy credit procurement; (3) retail opt-in auctions; (4) a customer referral program; and (5) time-of-use auctions. Thus, each Company's Program involves a substantial number of common questions of law and fact.

3. Administrative resources would be used most effectively and efficiently, and administrative economy would be advanced, by the formal consolidation requested herein.

THEREFORE, for the foregoing reasons, the Companies request that the four separately-docketed proceedings regarding their Default Service Programs be formally consolidated.

Respectfully submitted,



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Power Company and West Penn Power
Company*

Dated: December 20, 2011