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November 3, 2015

VIA HAND DELIVERY

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

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 Nos. _____

Dear Secretary Chiavetta:

Enclosed for filing is the Joint Petition of Metropolitan Edison Company, Pennsylvania Electric Company, Pennsylvania Power Company and West Penn Power Company (collectively, the "Companies") for Approval of Their Default Service Programs and accompanying Direct Testimony and Exhibits. In addition, enclosed please find a CD containing the filing in PDF format.

The Companies respectfully request that notice of this filing and a deadline for intervention be published in the November 14, 2015 issue of the *Pennsylvania Bulletin*.

Copies have been served on the parties in the manner indicated, as shown on the attached Certificate of Service.

Please feel free to contact me if you have any questions.

Sincerely,



Tori L. Giesler

Enclosures

c: As Per Certificate of Service

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**JOINT PETITION OF METROPOLITAN :
EDISON COMPANY, PENNSYLVANIA : DOCKET NOS.
ELECTRIC COMPANY, PENNSYLVANIA :
POWER COMPANY AND WEST PENN :
POWER COMPANY FOR APPROVAL OF :
THEIR DEFAULT SERVICE PROGRAMS :**

**JOINT PETITION OF METROPOLITAN EDISON
COMPANY, PENNSYLVANIA ELECTRIC COMPANY,
PENNSYLVANIA POWER COMPANY AND WEST
PENN POWER COMPANY**

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Counsel for Metropolitan Edison
Company, Pennsylvania Electric Company,
Pennsylvania Power Company and West
Penn Power Company.

Dated: November 3, 2015

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**JOINT PETITION OF METROPOLITAN :
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**JOINT PETITION OF METROPOLITAN EDISON
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Pursuant to Pennsylvania’s Electricity Generation Customer Choice and Competition Act, 66 Pa.C.S. § 2801, *et seq.* (the “Competition Act”), as amended by Act 129 of 2008 (“Act 129”),¹ the Default Service regulations of the Pennsylvania Public Utility Commission (“Commission”) at 52 Pa. Code §§ 54.181- 54.189 (“Regulations”), and the Commission’s Policy Statement on Default Service at 52 Pa. Code §§ 69.1801-1817 (“Policy Statement”), 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 petition the Commission for approval of their Default Service Programs (the “Program(s)”) as set forth herein. The Companies file this Joint Petition in accordance with their responsibilities as Default Service Providers to establish the terms and conditions under which they will procure default service supplies, provide default

¹ Act 129 amended several sections of the Public Utility Code. However, as used in this Joint Petition, “Act 129” will refer to the amendments made by Act 129 to 66 Pa.C.S. § 2807(e), unless specifically stated otherwise.

service to non-shopping customers, satisfy requirements imposed by the Alternative Energy Portfolio Standards Act (“AEPS Act”)² and recover all associated costs on a full and current basis for the period from June 1, 2017 through May 31, 2019.

Consistent with the Competition Act, Regulations, Policy Statement and AEPS Act, the Companies’ Programs are designed to produce the least cost over time by procuring a prudent mix of long-term, short-term and spot market generation supplies and are structured to satisfy their obligation to furnish adequate and reliable service to default service customers. Accordingly, the Companies respectfully request that the Commission enter an order: (1) granting this Joint Petition; (2) approving the Companies’ proposed Programs, including each procurement plan, implementation plan, and contingency plan, as well as related bidder rules, supplier master agreement (“SMA”), credit documents, and other associated agreements for default service supply from June 1, 2017 through May 31, 2019; (3) approving the Companies’ proposed rate design and tariffs for default generation service, including recovery of all of the Companies’ costs associated with the provision of default service; (4) approving continuation of the Companies’ existing Customer Referral Programs (“CRP”) from June 1, 2017 through May 31, 2019, including the cost recovery method approved in their DSP II and DSP III Proceedings³; (5) approving CRA International, Inc. d/b/a Charles River Associates (“CRA”) as the independent third-party evaluator for the Companies’ default supply procurements and The Brattle Group as the independent third-party evaluator for the Companies’ solar photovoltaic alternative energy credit procurements; (6) finding that neither the Companies nor their affiliates have withheld from the

² 73 P.S. §§ 1648.1 – 1648.8 and related provisions of 66 Pa.C.S §§ 2813-2814.

³ See Docket Nos. P-2011-2273650 (Met-Ed), P-2011-2273668 (Penelec), P-2011-2273669 (Penn Power), and P-2011-2273670 (West Penn Power) (collectively, the “DSP II Proceeding”); Docket Nos. P-2013-2391368 (Met-Ed), P-2013-2391372 (Penelec), P-2013-2391375 (Penn Power), and P-2013-2391378 (West Penn) (collectively, the “DSP III Proceeding”).

market any generation supply in a manner that violates federal law; (7) finding that the Programs include prudent steps necessary to negotiate favorable generation supply contracts; (8) finding that the Programs include prudent steps necessary to obtain least-cost generation supply on a long-term, short-term and spot market basis; (9) granting a waiver of the rate design provisions of 52 Pa. Code § 54.187 and transmission-related price-to-compare provisions at 52 Pa. Code §§ 54.182 and 54.187, to the extent necessary; (10) approving the Companies' proposed SMA as an affiliated interest agreement under 66 Pa.C.S. § 2102; (11) approving the Companies' ability to transfer, at market, alternative energy credits ("AECs") acquired from non-utility generators ("NUGs") amongst each other as affiliated transactions; and (12) approving the Companies' proposed revisions to their respective supplier tariffs related to their purchase of receivables ("POR") programs.

I. INTRODUCTION AND OVERVIEW

1. Met-Ed is a wholly owned subsidiary of FirstEnergy Corp. that provides service to approximately 559,000 electric utility customers in eastern Pennsylvania. Penelec is a wholly owned subsidiary of FirstEnergy Corp. that provides service to approximately 587,000 electric utility customers in central and western Pennsylvania. Penn Power is a wholly owned subsidiary of the Ohio Edison Company, which, in turn, is a wholly owned subsidiary of FirstEnergy Corp. Penn Power provides service to approximately 163,000 electric utility customers in western Pennsylvania. West Penn is a wholly owned subsidiary of FirstEnergy Corp. West Penn provides service to approximately 721,000 electric utility customers in western Pennsylvania.

2. Each Company is an electric distribution company ("EDC") as defined in the Competition Act and is the electric generation Default Service Provider within its service territory for retail customers who do not choose an alternative electric generation supplier ("EGS") or whose EGS fails to provide service.

3. The Competition Act became effective on January 1, 1997, and, among other things, restructured the electric utility industry in Pennsylvania by deregulating the generation of electricity, creating the framework for retail customers to choose alternative suppliers of generation, and establishing caps on unbundled rates that EDCs could charge during the transition to competition.

4. Section 2806(d) of the Competition Act, 66 Pa.C.S. § 2806(d), required EDCs to file restructuring plans for Commission approval that, in relevant part, “unbundled” (functionally disaggregated) their rates into distribution, transmission and generation components. Each of the Companies filed restructuring plans which, subject to certain modifications, were approved by the Commission.⁴

5. Following the transition to competition, the Companies retained the obligation to serve as the Default Service Providers for their retail customers. The Companies’ current Commission-approved default service programs expire on May 31, 2017.⁵

6. Section 54.185(a) of the Regulations provides that a Default Service Provider should file a default service program with the Commission no later than twelve months before its current default service program will expire. In order to have sufficient time to undertake the competitive procurement process to obtain default generation supplies for service on and after June 1, 2017, the Companies need to have approved default service programs in place by approximately July 31, 2016. Accordingly, the Companies are filing this Joint Petition to obtain approval by that

⁴ See Docket Nos. R-00974008 and R-00974009 (Met-Ed and Penelec) (Order entered October 20, 1998); Docket No. R-00974149 (Penn Power) (Orders entered July 22, 1998 and September 17, 1999); Docket No. R-00973981 (West Penn) (Order entered November 19, 1998).

⁵ On July 24, 2014, the Commission issued an Opinion and Order approving the Companies’ current default service programs under the DSP III Proceeding.

date. *See* 66 Pa.C.S. § 2807(e)(3.6) (providing that the Commission shall issue a final order approving or disapproving a proposed default service program within nine months of filing).

7. This Joint Petition sets forth the Program for each of the Companies and, as such, identifies and describes the Companies' procurement plans, implementation plans, contingency plans and the design of rates to recover all reasonable costs on a full and current basis.

8. This Joint Petition also incorporates the proposed standard default service SMA; auction rules; requests for proposal ("RFP") rules; associated form agreements; and proposed tariff changes; along with the following direct testimony supporting various components of the Programs:

- **Met-Ed/Penelec/Penn Power/West Penn Statement No. 1, Direct Testimony of Robert B. Reeping** (Product Definitions, Procurement Process and Schedule, Default Service Supplier Master Agreement, Alternative Energy Portfolio Standards Act Requirements, Contingency Plans).
- **Met-Ed/Penelec/Penn Power/West Penn Statement No. 2, Direct Testimony of James D. Reitzes** (Analysis of Default Service Supply Plans).
- **Met-Ed/Penelec/Penn Power/West Penn Statement No. 3, Direct Testimony of Kimberlie L. Bortz** (Customer Notice, Rate Design and Cost Recovery, Customer Referral Program, Purchase of Receivables Program, Related Tariff Matters).

9. As explained in the Joint Petition and supporting testimony, the Companies are proposing limited changes to their existing, Commission-approved default service programs.

II. DEFAULT SERVICE PROCUREMENT PLAN

A. Default Service Products

10. The Companies seek to procure full-requirements, load-following energy and energy-related products for all default service customers through a competitive procurement process. For procurement purposes, non-shopping load will be segregated into residential, commercial and industrial customer classes. Each customer class will have its own product specifications, as described below. The load of each class will be divided into tranches, with each tranche constituting a fixed percentage of each of the Company's non-shopping load. As explained by Ms. Bortz, the Companies are proposing to maintain the customer class definitions that were approved by the Commission in the DSP III Proceeding.

11. Winning bidders in the competitive procurement process must fulfill all obligations imposed on a load serving entity ("LSE") by PJM Interconnection, LLC ("PJM") and, as LSEs, will be required to: (i) provide energy, capacity and transmission service (including Network Integration Transmission Service ("NITS"), but subject to specific exclusions);⁶ (ii) pay all ancillary service costs and PJM administrative expenses; and (iii) provide any other services and pay any other fees as required by PJM of an LSE. Default service suppliers in the Met-Ed, Penelec and Penn Power service territories will also be responsible for meeting 100% of the non-solar Tier I and Tier II AEPS Act requirements. Met-Ed, Penelec and Penn Power will procure all necessary solar photovoltaic requirements on behalf of default service suppliers and EGSs that serve load in

⁶ As explained in Section III.C., *infra*, the Companies will continue to assume responsibility for Regional Transmission Expansion Plan charges ("RTEP"), Expansion Cost Recovery Charges ("ECRC"), Reliability Must Run/generation deactivation charges ("RMR") associated with generating plants for which specific RMR charges begin after July 24, 2014, historical out of market tie line, generation and retail customer meter adjustments; and unaccounted for energy ("UFE") (collectively referred to as "non-market based charges," or "NMB charges"). These NMB charges will be assumed by the Companies for both default service suppliers and EGSs that serve load in the Companies' service areas, the costs for which will be recovered from customers in a competitively-neutral manner under their non-bypassable Default Service Support ("DSS") Riders.

their respective service areas. In the West Penn service territory, default service suppliers will be responsible for all Tier I and Tier II AEPS Act requirements (including solar photovoltaic requirements) less any Tier I AECs or solar photovoltaic AECs (“SPAECs”) that are allocated to the suppliers from existing long-term purchases made by West Penn. Each of these winning bidder obligations is consistent with existing supplier obligations under the Companies’ current default service plans.

12. Additionally, each winning supplier will be required to schedule delivery to the PJM load zone that corresponds to the Company with which it has contracted for the sale of power, as follows: “METED” for Met-Ed products, “PENELEC” for Penelec products, “Penn Power Aggregate” for Penn Power products, and “APS” for West Penn products. All load zones are located within the control area for which PJM is the regional transmission organization (“RTO”). Winning suppliers must be members of PJM and must comply with all regulations, business rules, scheduling protocols and all other aspects of doing business within PJM.

Residential Class

13. Each residential class tranche is a 100% fixed-price full-requirements, load-following product, the price for which will be established through the Companies’ descending-price clock auction process. A tranche is a fixed percentage of each Company’s default service load corresponding to approximately 50 megawatts (“MW”), although the actual load served will vary based on many factors, including customer migration to EGSs. As described in detail in the testimony of Mr. Reeping, residential products will have staggered 12 and 24-month terms.

Commercial Class

14. The commercial class products are similarly proposed as a 100% fixed-priced full-requirements, load-following product, served in approximately 50 MW tranches to be bid out through the Companies' descending-price clock auction process. Commercial products will have staggered 12 and 24-month terms.

Industrial Class

15. The industrial class product is an hourly-priced service ("HPS") based upon the PJM real-time zonal hourly market price. Suppliers will bid for the right to serve a portion of the HPS load for 12-month terms (commencing on either June 1, 2017 or June 1, 2018). Each tranche will be approximately 100 MW, although the actual load served will vary based on many factors, including customer migration to EGSs. Winning suppliers will be paid the winning price bid in the hourly-priced auction, the hourly PJM real-time zonal LMP, and an additional fixed adder of \$4/MWh to capture the estimated costs of other supply components, including capacity, ancillary services, NITS, AEPS compliance, and other costs.

B. Procurement Schedule And Method

16. The Companies propose plans for the residential and commercial classes that consist of six procurements, occurring in January 2017 and 2018, April 2017 and 2018, and October 2016 and 2017. For the industrial class, the Companies are proposing two procurements occurring in January 2017 and January 2018. Exhibit RBR-1 to Mr. Reeping's testimony provides a detailed breakdown of the proposed procurements.

17. The Companies propose to procure the previously-described full-requirements default service products through simultaneous, multiple-round, descending-price clock auctions similar to those used, and being used, by the Companies under their current default service plans.

The proposed auction process allows suppliers to efficiently switch between the different products being procured by Met-Ed, Penelec, Penn Power and West Penn. Potential suppliers will have to meet certain credit and financial criteria in order to participate in the auction. Winning bids will be chosen from pre-qualified participants solely on the basis of price (i.e., the low-price bidders will be the procurement winners, subject to load cap restrictions). Bidding proceeds in rounds. In a round, the procurement manager announces a price for each product. Participants in the procurement then make bids for the number of tranches that they are willing to supply for each of the specified products at the announced prices. If the number of tranches supplied by all suppliers is greater than the number of tranches needed for a product at a particular price, the price for that product is reduced in the next round. In that round, suppliers are given an opportunity to bid again and are permitted to switch their bids from one product to another, if applicable.

18. The format described above is characterized as a “descending clock” auction because prices “tick down” as rounds progress, starting at an initial price and being reduced until the number of tranches that all bidders are willing to supply is just enough to match the load to be supplied.

19. The “descending clock” procurement process has many benefits. Its multi-product design allows all products to be procured in a single auction, which provides a cost-effective, economically efficient means to obtain multiple products while also allowing for instantaneous market-based pricing. Suppliers receive feedback from the results of each round. Because pricing is transparent, some suppliers will withdraw, and the least-cost suppliers will prevail. The Companies have successfully employed the descending clock auction to obtain default supplies under their current default service programs, and the Commission is familiar with the process and the results it obtains.

20. Under the Companies' current default service programs, the Companies employ a 50% auction load cap, which restricts the amount of supply any one bidder can win in an auction. The Companies propose to increase their load cap to be imposed over the course of the proposed program to a higher limit of 75%.

C. Supplier Master Agreement

21. In this proceeding, the Companies are proposing to continue the use of their current Commission-approved SMA for their default service programs, with only limited modifications, which was based on the product of the Commission's Office of Competitive Market Oversight's procurement collaboration working group.

22. As described in detail in the testimony of Mr. Reeping, the proposed SMA differs from the Companies' current Commission-approved SMAs in two limited ways: (1) for residential/commercial products, there will no longer be a spot component to the product mix and, therefore, there will only be a fixed component for these products for the forthcoming default service period; and (2) seasonal factors for the adjustment of residential and commercial prices will no longer be applied.

D. AEPS Act Requirements

Non-Solar Photovoltaic Requirements

23. In accordance with Section 54.185(e)(1) of the Regulations, the Companies propose to satisfy most of their AEPS Act requirements as part of the solicitation of a default service supply. Specifically, winning suppliers of full-requirements default service products in the Met-Ed, Penelec and Penn Power service territories will be responsible for meeting all non-solar Tier I and Tier II requirements. Winning suppliers in West Penn's service territory will be responsible for

those same requirements less any Tier I AECs that are allocated to the suppliers on a load ratio basis from existing long-term purchases made by West Penn.

24. Met-Ed and Penelec will have the added flexibility to make market-priced sales of excess AECs acquired under existing Commission-approved NUG contracts to their Pennsylvania affiliates for use in meeting the Companies' AEPs requirements.

Solar Photovoltaic Requirements

25. Met-Ed, Penelec and Penn Power will conduct an RFP to solicit bids for the provision of a fixed number of SPAECs based on each Company's most recent distribution load forecasts. The amount selected for procurement is expected to meet approximately 100% of the solar photovoltaic AEPS requirements of all EGSs and default service suppliers, after taking into account previous SPAEC purchases.

26. The proposed RFP process is consistent with the procurement process being used by Met-Ed, Penelec and Penn Power under their current Commission-approved default service plans. Prospective bidders will be invited to participate in a two-part RFP process. First, they become "qualified" bidders after submitting contact and credit information, making specified representations, and agreeing to specified conditions. Qualified bidders will be able to make binding offers in the second part of the process, which also requires that they post appropriate financial guarantees and agree to additional conditions designed to foster the competitiveness of the procurement process.

27. In the West Penn service territory, default service suppliers will be responsible for all solar photovoltaic requirements less any SPAECs that are allocated to the suppliers on a load ratio basis from existing long-term purchases made by West Penn.

E. Independent Evaluators

28. Consistent with the Regulations' requirements and the Policy Statement's recommendation, the Companies have retained CRA to be the independent third-party evaluator for their default service procurements. CRA has extensive expertise in the operation of competitive wholesale energy markets and is serving as the independent third-party evaluator for the Companies' current Commission-approved default service plans.

29. The Companies have selected The Brattle Group to serve as the independent third-party evaluator for the procurement of SPAECs. The Brattle Group has considerable expertise in competitive energy matters and has been involved in several RFP design and management processes, including the procurement of electric power and renewable energy supplies under long-term contracts. The Brattle Group has served as the independent evaluator in past SPAEC procurements held by the Companies.

30. The auction and RFP rules that guide the bid solicitation process are designed to comply with the Commission's codes of conduct and to ensure that bidder qualification requirements are fair and nondiscriminatory.⁷

F. Requirements Of PJM

31. As required by Section 54.185(e)(4) of the Regulations, the Companies' Programs are consistent with the legal and technical requirements of PJM pertaining to the generation, sale and transmission of electricity. The Companies' proposed SMA requires suppliers to maintain specific qualifications under applicable PJM agreements and rules. Before suppliers may participate in the bid process, they will have to demonstrate that they can fulfill the technical and regulatory requirements of the SMA, including becoming an LSE, as defined under PJM's rules.

⁷ See 52 Pa. Code § 54.186(b)(6)(ii) and (c)(2).

G. Contingency Plan

32. The Companies propose to continue utilizing the contingency plans in their current Commission-approved default service plans, which address the following three possible scenarios: (i) an individual solicitation is not fully subscribed; (ii) the Commission rejects the bid results from a solicitation; and (iii) a winning supplier defaults prior to the start of the delivery period or at any time during the delivery period.

33. For full-requirements, load-following products, if a scheduled solicitation is not fully subscribed following the initial proposed procurement or if the Commission rejects the bid results from a solicitation, the Companies will rebid the unfilled tranches from that solicitation in the next scheduled procurement for which there is sufficient calendar time to include the tranches. For any unfilled tranches still remaining, the Companies will purchase the necessary physical supply through PJM-administered markets. The Companies will not enter into hedging transactions to attempt to mitigate the associated price or volume risks to serve such unfilled tranches. The Companies propose to secure any AEPS Act compliance requirements for unfilled tranches at market prices.

34. If a winning bidder defaults prior to the start of, or during, the delivery period, the Companies will offer the unfilled tranches to the other qualified bidders who participated in the most recent solicitation of full-requirements, load-following products. The Companies may enter into an agreement with the qualified bidder(s) offering the best terms for the unfilled tranches resulting from the default, provided the prices offered by such bidder(s) are consistent with the original prices at which the unfilled tranches were procured, giving due consideration to changes in market conditions from the time when the original tranches were procured. If the Companies are not able to enter into such agreement and at least thirty calendar days remain prior to the start of the delivery period, the Companies will seek to bid the defaulted tranches in a separate

supplemental competitive solicitation. If insufficient time exists to conduct an additional competitive solicitation, or if the supplemental solicitation is unsuccessful, the Companies will supply the tranches by purchasing power in the PJM-administered markets in the same manner described in the preceding paragraph.

35. If a SPAEC solicitation held by Met-Ed, Penelec or Penn Power is not fully subscribed, the Commission rejects the bid results from a solicitation, or a winning supplier defaults before or during the delivery period, the Companies will conduct short-term procurements at market prices to ensure compliance with solar photovoltaic AEPS requirements until such time as the Commission approves an alternative mechanism.

III. RATE DESIGN AND COST RECOVERY

A. Price To Compare Default Service Rate Rider

36. The Companies currently recover the cost of default service for the residential and commercial customer classes through a Price to Compare Default Service Rate (“PTC”) Rider. The Companies are not proposing any changes to their PTC Riders in this proceeding.

37. The PTC Riders will continue to adjust rates quarterly, with rate change filings to be made the latter of forty-five days prior to the effective date or seven days after the last supply auction.

B. Hourly Pricing Default Service Rider

38. The Companies currently recover the cost of default service for the industrial customer class through an Hourly Pricing (“HP”) Default Service Rider. In addition to the industrial customer class, this rider applies to qualifying commercial customers with smart metering technology that elect, on a voluntary basis, to take default service under the HP Default

Service Rider. The Companies are not proposing any changes to their HP Default Service Riders in this proceeding.

39. The HP Default Service Riders will continue to adjust rates quarterly, with rate change filings to be made the latter of forty-five days prior to the effective date or seven days after the last supply auction.

C. Default Service Support Rider

40. The Companies currently have DSS Riders that impose non-bypassable charges. The Companies will continue to assume responsibility for NMB Charges for both default service suppliers and EGSs that serve load in the Companies' service areas and recover the costs from customers under the DSS Riders. The Companies are not proposing any changes to their DSS Riders in this proceeding.

41. Consistent with the Companies' existing tariffs, the Companies are proposing to continue a flat per-kWh rate design for the residential and commercial customer classes and a demand-based rate design for the industrial customer class. The demand for the industrial customer class will continue to be the single coincident peak kW Network Service Peak Load in effect from time to time, as calculated by the Companies in accordance with PJM rules and requirements. This rate design is consistent with the current metering capabilities of the various customer classes.

42. The Companies respectfully request a waiver, if necessary, of the Regulations (specifically with regard to the inclusion of transmission costs in the price to compare addressed at 52 Pa. Code §§ 54.182 and 54.187) so that they may recover the NMB Charges through the non-bypassable DSS Riders rather than the price-to-compare.

D. Solar Photovoltaic Requirements Charge Rider

43. Met-Ed, Penelec, and Penn Power currently have a Solar Photovoltaic Requirements Charge Rider (“SPVRC Rider”) that applies to all delivery service customers and are not proposing any changes to the SPVRC Rider in this proceeding.

E. Time-Of-Use Rates

44. The Companies currently offer optional TOU pricing rates to residential customers and propose to continue to do so without modification under their Programs. These offerings are provided through the Commission-approved Residential TOU Default Service Riders, which have no expiration date. The Companies propose to continue these Riders without modification under their Programs.

F. Reconciliation

45. As described in the testimony of Ms. Bortz, the PTC Rider, HP Default Service Rider, and SPVRC Rider currently include “E” factor reconciliation mechanisms.

46. The Companies are not proposing any changes to those reconciliation mechanisms.

IV. CUSTOMER REFERRAL PROGRAM

47. Each Company currently has a CRP for residential and small commercial customers and proposes to continue offering the CRP from June 1, 2017 to May 31, 2019.

48. Consistent with the current CRP and the Companies’ existing tariffs, the Companies propose to continue to recover CRP costs through an EGS participant fee not to exceed \$30 per enrolled customer with any remaining program costs recovered, on a non-bypassable basis, through the Companies’ applicable DSS Riders.

49. The Companies are proposing limited changes to the Customer Referral Program Agreement (“CRP Agreement”) between the Companies and participating EGSs, which outlines

the terms and conditions to which a supplier must agree and meet in order to qualify to serve load through the CRP. Specifically, the Companies are proposing to reduce the notice period for those EGSs (“CRP Suppliers”) that have already participated in the program from 60 days to 30 days. In addition, the Companies propose to assess an hourly rate for research required and legal fees incurred to address customer complaints related to CRP Supplier activity that does not follow Commission regulations or adhere to the terms and conditions of the CRP Agreement.

V. PURCHASE OF RECEIVABLES

A. EGS-Related Write-Offs

50. Consistent with the Commission’s Policy Statement at 52 Pa. Code § 69.1814, each of the Companies agreed to provide, and the Commission approved, POR programs for residential and small commercial accounts served by EGSs.⁸ Under each of the Companies’ existing POR programs, accounts receivable are purchased from participating EGSs at a zero discount rate (meaning the Companies pay the face value of the account receivable regardless of what they are actually able to collect from customers), which eliminates the risk to EGSs of uncollectible accounts expense associated with serving residential and small commercial customers.

51. In order to be able to maintain the POR program for all EGSs serving residential and small commercial customers, the Companies propose the addition of a clawback clause to their POR programs related to EGS write-offs. Under this clause, an annual charge would be assessed, beginning September 2016, to those EGSs that exceed 150% of the average percentage of supplier

⁸ See, *Joint Petition of Metropolitan Edison Company and Pennsylvania Electric Company for Approval of Their Default Service Programs*, Docket Nos. P-2009-2093053 and P-2009-2093054 (Opinion and Order approving settlement entered November 6, 2009) (Met-Ed and Penelec); *Petition of Pennsylvania Power Company for Approval of its Default Service Programs*, Docket No. P-2010-2157862 (Opinion and Order approving settlement entered November 17, 2010) (Penn Power); *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 Nos. P-2013-2391368, *et al.* (Opinion and Order approving settlement entered July 24, 2014) (revising West Penn).

write-offs as a percentage of revenue as calculated separately for each of Met-Ed, Penelec, Penn Power and West Penn for each twelve-month period ending August 31st. EGSs would then be charged the difference between their actual annual write-off amount and 150% of the respective Company's average annual EGS write-offs as a percentage of billed EGS revenues. The charge would recover the amount of EGS write-offs over 150% of the operating company average and would be billed to the EGS annually.

52. Allowances for uncollectible accounts expense were approved in the Companies' recent base rate cases which split uncollectibles into a portion attributable to distribution rates and a separate portion attributable to default service and POR rates, with the default service/POR-related portion recovered through the Companies' DSS Riders. The default service/POR-related portion of uncollectible accounts expense for each Company is incurred, in part, as a result of the Companies' POR programs.

53. The Companies propose to retain the amount charged to EGSs if each individual Company's actual uncollectible accounts expense is higher than the amount of uncollectible expense in base rates plus the amount included in the DSS Rider for the twelve-month period ended September 30th of each year. Alternatively, the Companies will refund the EGS charge to customers through a reduction to their respective DSS Rider if the Companies' actual uncollectible expense is less than the amount of uncollectible expense recovered in base rates and the DSS Rider.

B. EGS Refunds

54. The Companies are also proposing revisions to their supplier tariffs such that EGS refunds under the POR go directly to the Companies to apply to the customer's account balance first, if necessary.

55. Currently, EGSs serving customers under the Companies' PORs are providing refunds associated with their service directly to the customer, rather than providing refunds through the Companies' billing system. The Companies' proposal would ensure that the EGS refund is applied first to a customer's open account balance before refunding any remaining amounts to the customer.

VI. AFFILIATE RELATIONS

56. Pursuant to 66 Pa.C.S. § 2807(e)(3.1)(III)(B), which states that any agreement between affiliated parties shall be subject to Commission review and approval under Chapter 21 of the Public Utility Code, the Companies request that the Commission approve the *pro forma* SMA as an affiliated interest agreement pursuant to 66 Pa.C.S. § 2102. The Regulations and Policy Statement permit affiliates of Default Service Providers to participate in competitive procurements for default service supplies. Consequently, it is possible that the Companies' affiliate, FirstEnergy Solutions Corp. ("FES"), may participate in one or more of the Companies' proposed procurements. In the event FES is a winning bidder, it will need to execute the SMA in the same timeframe as any other supplier. As a result, advance approval of the *pro forma* SMA, which accompanies this Joint Petition and the Companies' direct testimony, as an affiliated interest agreement is necessary. The Commission granted similar approvals of the Companies' existing SMAs as part of the approval of their existing default service programs.

57. Section 2807(e)(3.7)(III) of the Public Utility Code requires the Commission, when approving default service programs, to find that "[n]either the Default Service Provider nor its affiliated interest has withheld from the market any generation supply in a manner that violates federal law." The Companies do not own generation and, pursuant to the Commission's

Competitive Safeguards⁹ and the FERC's Standards of Conduct,¹⁰ the Companies' supplier affiliate, FES, does not discuss generation market related issues with Met-Ed, Penelec, Penn Power or West Penn. However, the Companies are not aware of any determination by any court or regulatory agency of competent jurisdiction that FES has withheld generation supply from the wholesale market in violation of federal law.

VII. NOTICE

58. In accordance with Sections 54.185 and 54.188 of the Regulations, the Companies will provide notice of this filing in several ways:

- Within thirty days of filing this Joint Petition, each of the Companies will provide public notice of the filing by publishing a notice in the major newspapers serving their respective service areas. The notice will contain information about the Companies' tariff filings, their proposed competitive solicitations of generation resources, how the Companies' Programs may affect customers, where the filings are available for public inspection, how comments or complaints can be filed, and how customers can participate in this proceeding.
- The Companies' Joint Petition and their direct testimony and accompanying exhibits will be made available for inspection at Met-Ed's principal office in Reading, Penelec's principal office in Erie, Penn Power's office in Clark, and West Penn's principal office in Greensburg. This material will also be posted to the Companies' public internet domain, where it will be available electronically for public inspection.

⁹ 66 Pa. Code § 54.121, *et seq.*

¹⁰ 18 C.F.R. Part 358.

- The Companies will provide additional public notice by means of a press release to inform customers of the filing.
- The Companies have also served copies of this Joint Petition and direct testimony and accompanying exhibits on the OCA, OSBA, BI&E, PJM, Met-Ed Industrial Users Group, Penelec Industrial Customer Alliance, Penn Power Users Group, West Penn Power Industrial Intervenors, the Retail Electric Supplier Association, the Pennsylvania State University, and all EGSs registered to provide service in their respective service territories.
- The Companies will provide additional notice as directed by the Commission.

59. The Companies believe these communication efforts will provide potential interested parties with ample notice as well as an opportunity to participate in the Commission’s proceeding addressing the Companies’ Programs.

VIII. PROPOSED SCHEDULE

60. Pursuant to § 2807(e)(3.6) of the Public Utility Code, the Commission will have nine months from the date of this filing to issue a final order. In accordance with that timeline, the Companies suggest the following schedule for this proceeding:

Joint Petition Filing	November 3, 2015
Publication in the Pennsylvania Bulletin	November 14, 2015
Pre-Hearing Conference	December 1, 2015
Other Parties’ Direct Testimony	January 4, 2016
Rebuttal Testimony	February 1, 2016
Surrebuttal Testimony	February 15, 2016
Oral Rejoinder and Hearings	February 23-24, 2016
Main Briefs	March 18, 2016
Reply Briefs	April 1, 2016

Recommended Decision	May 6, 2016
Exceptions	May 23, 2016
Reply Exceptions	June 2, 2016
Commission Order	July 31, 2016

IX. REQUEST FOR WAIVERS

61. To the extent necessary, the Companies request: (1) a waiver of 52 Pa. Code § 54.187(h) – (j) in order to continue to use their proposed residential, commercial and industrial customer class definitions, which the Commission has previously approved; and (2) a waiver of the Commission’s requirements at 52 Pa. Code §§ 54.182 and 54.187 with regard to including certain transmission-related costs in the price-to-compare so that they may recover the NMB Charges through the non-bypassable DSS Riders rather than the price-to-compare as previously explained.

X. PUBLIC INTEREST CONSIDERATIONS

62. The Companies’ proposed Programs are in the public interest for all of the reasons previously explained and for the following reasons: (1) the Programs will utilize a competitive and transparent bid solicitation process; (2) the Programs will utilize fair and nondiscriminatory bidder qualification requirements; (3) an independent third party evaluator will be utilized for all procurements; (4) the Programs are consistent with the legal and technical requirements established by PJM and align with its planning year; (5) the Programs provide for compliance with AEPS requirements; (6) the Programs have protocols to ensure that the Companies’ supplier affiliates do not receive an advantage in the solicitation and evaluation of competitive bids; (7) the Programs provide for hourly or quarterly adjustments of the default service rate components, as applicable; (8) the Programs include viable contingency plans; (9) the Programs ensure that the price-to-compare is designed to recover all default service costs (subject to the waiver for certain

transmission-related costs, as previously explained); (10) the Programs have a procurement schedule that diversifies the times when procurements occur; (11) the Programs utilize a prudent mix of long-term, short-term and spot market generation supply to yield the least cost to customers over time; and (12) the Companies are providing ample notice of their proposed Programs to interested parties.

XI. CONCLUSION

Pursuant to the requirements of 66 Pa.C.S. § 2807(e)(3.7), the Companies request that the Commission enter an order: (1) granting this Joint Petition; (2) approving the Companies' proposed Programs, including each procurement plan, implementation plan, and contingency plan, as well as related bidder rules, SMA, credit documents, and other associated agreements for default service supply from June 1, 2017 through May 31, 2019; (3) approving the Companies' proposed rate design and tariffs for default generation service, including recovery of all of the Companies' costs associated with the provision of default service; (4) approving continuation of the Companies' existing Customer Referral Programs from June 1, 2017 through May 31, 2019, including the cost recovery method approved in their DSP II and DSP III Proceedings; (5) approving CRA as the independent third-party evaluator for the Companies' default supply procurements and The Brattle Group as the independent third-party evaluator for the Companies' solar photovoltaic alternative energy credit procurements; (6) finding that neither the Companies nor their affiliates have withheld from the market any generation supply in a manner that violates federal law; (7) finding that the Programs include prudent steps necessary to negotiate favorable generation supply contracts; (8) finding that the Programs include prudent steps necessary to obtain least-cost generation supply on a long-term, short-term and spot market basis; (9) granting a waiver of the rate design provisions of 52 Pa. Code § 54.187 and transmission-related price-to-compare provisions at 52 Pa. Code §§ 54.182 and 54.187, to the extent necessary; (10) approving the

Companies' proposed SMAs as affiliated interest agreements under 66 Pa.C.S. § 2102; (11) approving the Companies' ability to transfer alternative energy credits acquired from NUGs amongst each other as affiliated transactions; and (12) approving the Companies' proposed revisions to their respective supplier tariffs related to their POR programs.

Respectfully submitted,



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Company*

Dated: November 3, 2015

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**JOINT PETITION OF METROPOLITAN :
EDISON COMPANY, PENNSYLVANIA : DOCKET NOS.
ELECTRIC COMPANY, PENNSYLVANIA :
POWER COMPANY AND WEST PENN :
POWER COMPANY FOR APPROVAL OF :
THEIR DEFAULT SERVICE PROGRAMS :**

CERTIFICATE OF SERVICE

I hereby certify and affirm that I have this day served a copy of the Joint Petition of Metropolitan Edison Company, Pennsylvania Electric Company, Pennsylvania Power Company and West Penn Power Company for Approval of Their Default Service Programs on the following persons in the matter specified in accordance with the requirements of 52 Pa. Code § 1.54:

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130 East John Carpenter Freeway
Irving, TX 75062

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

Liberty Power Delaware, LLC
1901 West Cypress Creek Road
Suite 600
Ft. Lauderdale, FL 33309

Liberty Power Holdings
1901 West Cypress Creek Road
Suite 600
Fort Lauderdale, FL 33309

Lincoln Energy Group, LLC
414 North Orleans Street
Chicago, IL 60654-4498

Linde Energy Services, Inc.
1 Greenwich Street
Suite 200
Stewartsville, NJ 08886

Little Deep LLC d/b/a Power USA
750 Lexington Avenue
23rd Floor
New York, NY 10022

Lower Electric, LLC
1307 Shermer Road
Northbrook, IL 60062

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

Mablock Consulting, LLC
d/b/a Lock Group
2727 LBJ Freeway
Suite 930
Dallas, TX 75234

Make The Switch USA, LLC
1209 Via Visalia
San Clemente, CA 92672

Marketing Systems Group, LLC dba Lion Power
2033 Milwaukee Ave., Suite 350
Riverwoods, IL 60015

MC Squared Energy Services, LLC
175 W. Jackson Blvd., Suite 240
Chicago, IL 60604

Metromedia Power, Inc.
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Eaton Town, NJ 07724

MidAmerican Energy Company
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Urbandale, IA 50322

Live Energy, Inc.
1124 Glade Road
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Collegeville, TX 76034

LVI Power, LLC
1414 Key Highway
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Baltimore, MD 21230

M&L Service Providers LLC
134 Leonard Street
Lakewood, NJ 08701

Manhattan Energy, LLC
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5th Floor
New York, NY 10004

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Philadelphia, PA 19112

Maryland Energy Advisors, LLC
d/b/a PointClickSwit
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Baltimore, MD 21202

McEnergy, Inc.
200 Summitt Lake Dr., Suite 150
Valhalla, NY 10595

Mid Atlantic Energy Services, LLC
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Carbondale, PA 18407

Mint Energy, LLC
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Burlington, MA 01803

Mitchell Energy Management
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Wilmington, DE 19803-2204

Mondre Energy, Inc.
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Austin, TX 78758

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

Navigate Power LLC
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Chicago, IL 60614

New America Power LLC
41 University Dr., Suite 400
Newtown, PA 18940

NextEra Energy Services Pennsylvania, LLC
20455 State Hwy 249, Suite 200
Houston, TX 77070

Noresco, LLC
510 Thornall St., Suite 170
Edison, NJ 08837

North Eastern States Inc.
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1301 McKinney Suite 1250
Houston, TX 77010

Northeast Energy Advisors, LLC
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Pittsburgh, PA 15090

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Greensburg, PA 15601

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Columbus, OH 43214

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Norwalk, CT 06850

North Shore Energy Consulting, LLC
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Northeastern Energy Consultants, LLC
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Alexandria, VA 22310

Open Market Energy LLC
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Bethesda, MD 20814

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

Oxford Energy Services, LLC
90B John Muir Drive, Suite 100
Amherst, NY 14228

Papillon Productions, LLC
d/b/a Electricity Club
43 Mistflower Pl
The Woodlands, TX 77381

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Radnor, PA 19087

Pepco Energy Services, Inc.
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Addison, TX 75001

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Power Target LLC
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Prospect Resources, Inc.
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