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November 30, 2015

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

VIA ELECTRONIC FILING

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. P-2015-2511333, P-2015-2511351, P-2015-2511355, P-2015-2511356

Dear Secretary Chiavetta:

Attached for filing with the Pennsylvania Public Utility Commission is the Prehearing Memorandum of the Med-Ed Industrial Users Group ("MEIUG"), the Penelec Industrial Customer Alliance ("PICA"), the Penn Power Users Group ("PPUG"), and the West Penn Power Industrial Intervenors ("WPPII") (collectively, the "Industrials"), in the above-referenced proceedings.

As shown by the attached Certificate of Service, all parties to these proceedings are being duly served. Thank you.

Very truly yours,

McNEES WALLACE & NURICK LLC

By 
Teresa K. Schmittberger

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

/leh

Enclosures

c: Administrative Law Judge David A. Salapa (via e-mail and First-Class Mail)
Certificate of Service

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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

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the Penn Power Users Group, and
the West Penn Power Industrial Intervenors

Dated this 30th day of November, 2015, at Harrisburg, Pennsylvania

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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-2015-2511333 P-2015-2511351 P-2015-2511355 P-2015-2511356
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**PREHEARING MEMORANDUM OF
THE MET-ED INDUSTRIAL USERS GROUP,
THE PENELEC INDUSTRIAL CUSTOMER ALLIANCE,
THE PENN POWER USERS GROUP, AND
THE WEST PENN POWER INDUSTRIAL INTERVENORS**

Pursuant to the November 6, 2015, Prehearing Conference Order issued by Administrative Law Judge ("ALJ") David A. Salapa, the Met-Ed Industrial Users Group ("MEIUG"), the Penelec Industrial Customer Alliance ("PICA"), the Penn Power Users Group ("PPUG"), and the West Penn Power Industrial Intervenors ("WPPII") (collectively, the "Industrials") hereby submit this Prehearing Memorandum in the above-captioned proceedings.

I. HISTORY OF THE PROCEEDINGS

On November 3, 2015, the Metropolitan Edison Company ("Met-Ed"), Pennsylvania Electric Company ("Penelec"), Pennsylvania Power Company ("Penn Power"), and West Penn Power Company ("West Penn") (collectively, "Companies") petitioned the Pennsylvania Public Utility Commission ("PUC" or "Commission") for approval of a proposed plan for the terms and conditions under which the Companies would supply default service from June 1, 2017, through May 31, 2019. The proposed default service plans ("DSPs") also include components that would apply to all retail customers in the Companies' service territories, regardless of whether they receive default service.

On November 25, 2015, the Industrials filed a Joint Petition to Intervene in these proceedings. A description of the Industrials is set forth in Paragraphs 1 and 2 of the Joint Petition to Intervene.

A Prehearing Conference has been scheduled in these proceedings for December 1, 2015.

II. SERVICE LIST

For purposes of service in the above-captioned proceedings, please direct all communications to:

Susan E. Bruce (Pa. I.D. No. 80146)
Charis Mincavage (Pa. I.D. No. 82039)
Vasiliki Karandrikas (Pa. I.D. No. 89711)
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III. ANTICIPATED ISSUES AND SUB-ISSUES

The Commission's final disposition of the Companies' DSPs will directly affect the rates and terms of service that the Companies impose on the Industrials, whether or not they receive default service. The Industrials are participating in this proceeding to pursue any issues in the proposed DSPs or in other parties' direct testimony that could adversely impact them.

IV. PROPOSED WITNESSES

The Industrials are in the process of evaluating whether they will sponsor testimony in this proceeding. In the event that the Industrials decide to sponsor testimony, they will inform the parties and the ALJ of any intended witnesses and topics of testimony. The Industrials also intend to

participate in this proceeding through the submission of discovery, cross-examination of other parties' witnesses, and the submission of briefs, exceptions, and reply exceptions, if necessary.

V. STATEMENT OF EVIDENCE

The Industrials are in the process of evaluating the issues of impact in this proceeding. The Industrials reserve the right to raise further issues in testimony and to respond to all matters raised by other parties, including through the submission of discovery, cross-examination of other parties' witnesses, and the submission of briefs, exceptions, and reply exceptions, if necessary.

VI. PROPOSED SCHEDULE AND DISCOVERY RULES

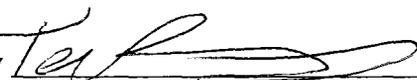
The Industrials will cooperate with the ALJ and the parties at the Prehearing Conference to develop an appropriate procedural schedule, including a schedule for submitting written testimony, conducting an in-person hearing and for submitting briefs, and discovery rules in accordance with the Commission's regulations and any directives issued by the ALJ. The Industrials will defer to the other parties in this proceeding in regard to other proposed discovery orders.

VI. POSSIBILITY OF SETTLEMENT

The Industrials are willing to participate in discussions with the other parties in an attempt to amicably resolve the issues in this proceeding, subject to the approval of the Pennsylvania Public Utility Commission.

Respectfully submitted,

McNEES WALLACE & NURICK LLC

By 

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Dated: November 30, 2015