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November 30, 2015

Via Electronic Filing

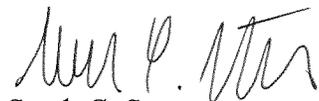
Rosemary Chiavetta, Secretary
PA Public Utility Commission
P.O. Box 3265
Harrisburg, PA 17105-3265

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 (DSP IV) – Docket Nos. P-2015-2511333; P-2015-2511351;
P-2015-2511355; and P-2015-2511356

Dear Secretary Chiavetta:

Enclosed for electronic filing please find the Retail Energy Supply Association's Prehearing Memorandum with regard to the above-referenced matter. Copies to be served in accordance with the attached Certificate of Service.

Sincerely,



Sarah C. Stoner

SCS/dsc
Enclosure

cc: Hon. David A. Salapa w/enc.
Cert. of Service w/enc.

CERTIFICATE OF SERVICE

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

Via Email and/or First Class Mail

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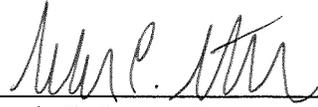
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Sarah C. Stoner, Esq.

Dated: November 30, 2015

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Joint Petition Of Metropolitan Edison : Docket No. P-2015-2511333
Company, Pennsylvania Electric Company, : Docket No. P-2015-2511351
Pennsylvania Power Company and West : Docket No. P-2015-2511355
Penn Power Company for Approval of : Docket No. P-2015-2511356
Their Default Service Program :

**PREHEARING MEMORANDUM
OF RETAIL ENERGY SUPPLY ASSOCIATION**

Pursuant to 52 Pa. Code §§ 5.72-5.75, the public notices published in the Pennsylvania Bulletin on November 14, 2015 and the Prehearing Conference Order dated November 6, 2015, the Retail Energy Supply Association (“RESA”)¹ submits this Prehearing Memorandum.

I. SERVICE OF DOCUMENTS

RESA requests that all documents be served on:

Deanne M. O’Dell, Esquire
Eckert Seamans Cherin & Mellott, LLC
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¹ The comments expressed in this filing represent the position of the Retail Energy Supply Association (RESA) as an organization but may not represent the views of any particular member of the Association. Founded in 1990, RESA is a broad and diverse group of more than twenty retail energy suppliers dedicated to promoting efficient, sustainable and customer-oriented competitive retail energy markets. RESA members operate throughout the United States delivering value-added electricity and natural gas service at retail to residential, commercial and industrial energy customers. More information on RESA can be found at www.resausa.org.

RESA also agrees to receive service of documents electronically in this proceeding. To the extent that materials are available electronically, it is requested that copies be served upon:

Daniel Clearfield – dclearfield@eckertseamans.com
Deanne O'Dell – dodell@eckertseamans.com
Sarah C. Stoner – sstoner@eckertseamans.com

II. SETTLEMENT

RESA is willing to participate in settlement discussions with any party to narrow the issues in this matter.

III. PROPOSED PLAN AND SCHEDULE OF DISCOVERY

RESA is amenable to working with the other parties in this matter to adopt a reasonable proposed plan and schedule of discovery. RESA does not have any proposals regarding discovery modifications.

IV. SCHEDULE FOR SUBMISSION OF TESTIMONY, HEARINGS AND BRIEFS

RESA will cooperate with the other parties and the ALJ to facilitate a workable litigation schedule.

V. WITNESSES

At this time, RESA is still evaluating whether or not to present testimony in this matter. RESA reserves the right to present a witness as may be necessary depending on the course of the proceeding and will provide the Presiding Officer as well as the other parties in this matter reasonable notice if necessary. RESA also reserves its right to add additional witnesses or change the identity of its witnesses at any time upon appropriate notice to the Presiding Officer and the parties.

VI. PRESENTLY IDENTIFIED ISSUES

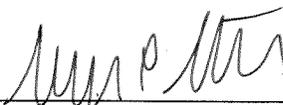
RESA is a trade association of power marketers, independent power producers, and a broad range of companies within the Mid-Atlantic marketplace, each of whom support the electric services industry and seek to develop a more competitive power industry. RESA members are licensed to sell electric energy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

RESA has identified the following issues that should be examined in this proceeding:

- Whether the Companies' overall default service supply plan is consistent with the Commission's regulations and the Public Utility Code.
- The effectiveness of the Companies' default service plan to promote retail market development for the benefit of consumers in the Companies' service territories.
- The appropriateness of the Companies' proposal to exclusively rely on 12 and 24 month contracts and to increase its current 50% auction load cap to 75%.
- Whether 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, is consistent with the Commission's regulations and the Public Utility Code.
- The appropriateness of the Companies' proposed changes to its Customer Referral Programs and continuation of the programs from June 1, 2017 through May 31, 2019.
- Whether the Companies' proposal to revise its purchase of receivables programs to include a clawback clause for write-offs is appropriate.
- The implications of the Companies' proposed revisions to their supplier tariffs relating to procedures for EGS refunds.

At this time, RESA continues to evaluate its position on and will refine its position based on further study of the proposals, review of discovery and additional input from other parties. RESA reserves the right to address other issues identified through its continued review and analysis of the filing or raised by other parties.

Respectfully submitted,



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Date: November 30, 2015

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