



COMMONWEALTH OF PENNSYLVANIA  
PENNSYLVANIA PUBLIC UTILITY COMMISSION  
P.O. BOX 3265, HARRISBURG, PA 17105-3265

IN REPLY PLEASE  
REFER TO OUR FILE

November 30, 2015

Via E-Filing

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

Re: Petition of Metropolitan Edison Company for Approval of a Default Service Program for the Period Beginning June 1, 2016 through May 31, 2019  
Docket No. P-2015-2511333

Petition of Pennsylvania Electric Company for Approval of a Default Service Program for the Period Beginning June 1, 2016 through May 31, 2019  
Docket No. P-2015-2511351

Petition of Pennsylvania Power Company for Approval of a Default Service Program for the Period Beginning June 1, 2016 through May 31, 2019  
Docket No. P-2015-2511355

Petition of West Penn Power Company for Approval of a Default Service Program for the Period Beginning June 1, 2016 through May 31, 2019  
Docket No. P-2015-2511356

Dear Secretary Chiavetta:

Enclosed please find the Bureau of Investigation and Enforcement's (I&E) **Prehearing Conference Memorandum** in the above-captioned proceeding.

Copies are being served on parties as identified in the attached certificate of service. If you have any questions, please contact me at (717) 783-7998.

Sincerely,

Allison C. Kaster  
Senior Prosecutor  
Bureau of Investigation and Enforcement  
PA Attorney I.D. #93176

ACK/sea  
Enclosure

cc: Certificate of Service  
ALJ David A. Salapa

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Petition of Metropolitan Edison Company	:	
for Approval of a Default Service	:	Docket No. P-2015-2511333
Program for the Period Beginning	:	
June 1, 2017, through May 31, 2019	:	
	:	
Petition of Pennsylvania Electric	:	
Company for Approval of a Default	:	Docket No. P-2015-2511333
Service Program for the Period Beginning	:	
June 1, 2017, through May 31, 2019	:	
	:	
Petition of Pennsylvania Power Company	:	
for Approval of a Default Service	:	Docket No. P-2015-2511333
Program for the Period Beginning	:	
June 1, 2017, through May 31, 2019	:	
	:	
Petition of West Penn Power Company	:	
for Approval of a Default Service	:	Docket No. P-2015-2511333
Program for the Period Beginning	:	
June 1, 2017, through May 31, 2019	:	

**CERTIFICATE OF SERVICE**

I hereby certify that I am serving the foregoing **Prehearing Conference Memorandum** dated November 30, 2015, in the manner and upon the persons listed below, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a party):

**Serve via Electronic and First Class Mail**

Tori L. Giesler, Esquire  
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Baltimore, MD 21202

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Harrisburg, PA 17108-1166



Allison C. Kaster  
Senior Prosecutor  
Bureau of Investigation and Enforcement  
PA Attorney I.D. No. 93176

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of Metropolitan Edison Company for	:	
Approval of a Default Service Program for the	:	P-2015-2511333
Period Beginning June 1, 2017, through	:	
May 31, 2019	:	
Petition of Pennsylvania Electric Company for	:	
Approval of a Default Service Program for the	:	P-2015-2511351
Period Beginning June 1, 2017, through	:	
May 31, 2019	:	
Petition of Pennsylvania Power Company for	:	
Approval of a Default Service Program for the	:	P-2015-2511355
Period Beginning June 1, 2017, through	:	
May 31, 2019	:	
Petition of West Penn Power Company for	:	
Approval of a Default Service Program for the	:	P-2015-2511356
Period Beginning June 1, 2017, through	:	
May 31, 2019	:	

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PREHEARING CONFERENCE MEMORANDUM  
OF THE  
BUREAU OF INVESTIGATION AND ENFORCEMENT

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**TO ADMINISTRATIVE LAW JUDGE DAVID A. SALAPA:**

The Bureau of Investigation and Enforcement (“I&E”) of the Pennsylvania Public Utility Commission (“Commission”) respectfully submits the following Prehearing Memorandum in the above-captioned consolidated proceedings.

## **I. INTRODUCTION**

On November 3, 2015, the First Energy Companies (“First Energy” or the “Companies”) consisting of: the Metropolitan Edison Company; the Pennsylvania Electric Company; the Pennsylvania Power Company; and the West Penn Power Company filed with the Commission a request for approval of proposed default service programs for each of the Companies as referenced by docket number in the caption above.

A Prehearing Conference is scheduled for December 1, 2015, at 10:00 a.m. with Administrative Law Judge David A. Salapa (“ALJ”) presiding. Pursuant to the ALJ’s Prehearing Conference Order issued November 6, 2015, I&E files the instant Prehearing Conference Memorandum.

## **II. SERVICE**

The Bureau of Investigation and Enforcement Prosecutor in these proceedings is Allison C. Kaster. Contact information is as follows:

By mail: Allison C. Kaster, Esquire  
Pennsylvania Public Utility Commission  
P.O. Box 3265  
Harrisburg, PA 17105-3265

By e-mail: akaster@pa.gov

By telephone: (717) 783-7998

By fax: (717) 772-2677

### **III. SETTLEMENT**

I&E is willing to make good faith efforts to successfully resolve this matter through settlement. In the event settlement discussions fail to result in a full and complete resolution of the matter, I&E is prepared to fully or partially litigate this proceeding.

### **IV. DISCOVERY**

I&E does not recommend any modifications to the Commission's discovery rules.

### **V. PROCEDURAL SCHEDULE**

I&E will work with the Companies and other parties to develop a schedule that is mutually agreeable.

### **VI. WITNESS**

It is currently expected that I&E may call Christopher Keller as a witness in these proceedings to provide testimony concerning the proposed Purchase of Receivables program. I&E's witness may be contacted through the information listed above for Prosecutor Kaster. I&E has identified Mr. Keller as a witness without the benefit of complete discovery or analysis of the positions of potential other parties to these proceedings. Accordingly, I&E reserves the right to call additional witnesses or withdraw the name of the witness identified above.

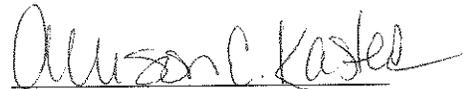
## VII. ISSUES

I&E has identified the proposed changes to the Purchase of Receivables program as an issue in these proceedings. I&E reserves the right to pursue additional issues pending discovery and analysis of the positions taken by other parties.

## VIII. EVIDENCE

I&E expects to present all written direct, rebuttal and surrebuttal testimony and accompanying exhibits at the evidentiary hearing. Moreover, I&E intends to rely on First Energy's filing, answers to interrogatories, annual reports and other documents submitted to the Commission, other relevant Commission filings, any other relevant Commonwealth agency letters or reports and other public documents and reports.

Respectfully Submitted,



Allison Kaster

Prosecutor

PA Attorney I.D. # 93176

Bureau of Investigation and Enforcement  
Pennsylvania Public Utility Commission  
Post Office Box 3265  
Harrisburg, Pennsylvania 17105-3265  
(717) 787-1976

Dated: November 30, 2015