

COMMONWEALTH OF PENNSYLVANIA



OFFICE OF CONSUMER ADVOCATE

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November 30, 2015

Rosemary Chiavetta, Secretary  
PA Public Utility Commission  
Commonwealth Keystone Bldg.  
400 North Street  
Harrisburg, PA 17101

Re: Joint Petition for 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:

Enclosed for filing is the Office of Consumer Advocate's Notice of Intervention and Public Statement in the above-referenced proceeding.

Copies have been served on the parties as indicated on the enclosed Certificate of Service.

Respectfully Submitted,

A handwritten signature in cursive script that reads "Kristine E Marsilio".

Kristine E Marsilio  
Assistant Consumer Advocate  
PA Attorney I.D. #316479

Enclosure

cc: Honorable David A. Salapa, ALJ  
Certificate of Service  
\*214450

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Joint Petition of Metropolitan Edison	:		
Company, Pennsylvania Electric Company,	:	Docket Nos.	P-2015-2511333
Pennsylvania Power Company and West	:		P-2015-2511351
Penn Power Company for Approval of	:		P-2015-2511355
Their Default Service Programs	:		P-2015-2511356

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NOTICE OF INTERVENTION

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Pursuant to 52 Pa. Code Sections 5.71-74, the Office of Consumer Advocate hereby gives Notice of Intervention in the above-captioned proceeding. A copy of all correspondence, notices, documents, orders or other communications with respect to the above-captioned proceeding should be addressed to the following:

Aron J. Beatty  
Senior Assistant Consumer Advocate  
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E-mail: [abeatty@paoca.org](mailto:abeatty@paoca.org)

Kristine E. Marsilio  
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PA Attorney I.D. # 316479  
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Office of Consumer Advocate  
5th Floor, Forum Place  
555 Walnut Street  
Harrisburg, Pa. 17101-1923  
Telephone: (717) 783-5048

Respectfully submitted,

  
\_\_\_\_\_  
Kristine E. Marsilio  
Assistant Consumer Advocate  
Pa. Attorney Id. No. 316479

Date: November 30, 2015

PUBLIC STATEMENT OF THE  
OFFICE OF CONSUMER ADVOCATE  
PURSUANT TO 71 P.S. SECTION 309-4(e)

Act 161 of the Pennsylvania General Assembly, 71 P.S. Section 309-2, as enacted July 9, 1976, authorizes the Consumer Advocate to represent the interests of consumers before the Pennsylvania Public Utility Commission (Commission). In accordance with Act 161, and for the following reasons, the Consumer Advocate determined to file an Answer and intervene in the proceedings before the Commission involving Metropolitan Edison Company, Pennsylvania Electric Company, Pennsylvania Power Company and West Penn Power Company (Met-Ed, Penelec, Penn Power, West Penn or, jointly, the Companies).

On November 3, 2015, the Companies filed with the Commission a Petition for approval of their Default Service Plan for their generation customers. The Companies' existing Default Service plan is set to expire on May 31, 2017. The proposed Default Service Plan is for the period of June 1, 2017 through May 31, 2019. In their Petition, the Companies propose to acquire supply for residential customers through a series of load-following, full requirements supply contracts in approximately 50 megawatt (MW) tranches. For each residential tranche, 100% of the supply will be at a fixed price. The new contracts for residential products are proposed to have staggered 12, and 24-month terms. There will be six procurements, occurring in October 2016 and 2017, January 2017 and 2018, and April 2017 and 2018.

The Consumer Advocate determined to intervene in this proceeding to protect the interests of the Companies' residential customers. The Consumer Advocate will seek to ensure that any default service rates that are approved as a result of this proceeding are just and reasonable, consistent with Pennsylvania law and meet the requirements of Act 129.

CERTIFICATE OF SERVICE

Joint Petition of Metropolitan Edison	:	
Company, Pennsylvania Electric Company,	:	Docket Nos. P-2015-2511333
Pennsylvania Power Company and West	:	P-2015-2511351
Penn Power Company For Approval of	:	P-2015-2511355
Their Default Service Programs	:	P-2015-2511356

I hereby certify that I have this day served a true copy of the foregoing document, the Office of Consumer Advocate's Notice of Intervention and Public Statement, upon parties of record in this proceeding in accordance with the requirements of 52 Pa. Code §1.54 (relating to service by a participant), in the manner and upon the persons listed below:

Dated this 30<sup>th</sup> day of November 2015.

SERVICE BY E-MAIL & INTEROFFICE MAIL

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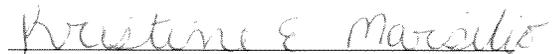
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