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Attorneys and Counsellors at Law

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November 30, 2015

Via Electronic Filing

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
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 for the Period Beginning June 1, 2017 through May 31, 2019; Docket Nos. A-2015-2511333, A-2015-2511351, A-2015-2511355, A-2015-2511356

Dear Secretary Chiavetta:

Enclosed for filing on behalf of Noble Americas Energy Solutions LLC is its Prehearing Conference Memorandum in the above-referenced matter. Copies of the Memorandum are being served upon the persons and in the manner set forth in the certificate of service attached to it.

Should you have any questions or require additional information, please do not hesitate to contact me.

Very truly yours,

THOMAS, NIESEN & THOMAS, LLC

By

Charles E. Thomas, III

Enclosure

cc: Certificate of Service (w/encl.)
Becky Merola (w/encl.)

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Petition of Metropolitan Edison Company for	:	
Approval of a Default Service Program for	:	Docket No. P-2015-2511333
the Period Beginning June 1, 2017 through	:	
May 31, 2019	:	
Petition of Pennsylvania Electric Company	:	
for Approval of a Default Service Program	:	Docket No. P-2015-2511351
for the Period Beginning June 1, 2017	:	
through May 31, 2019	:	
Petition of Pennsylvania Power Company for	:	
Approval of a Default Service Program for	:	Docket No. P-2015-2511355
the Period Beginning June 1, 2017 through	:	
May 31, 2019	:	
Petition of West Penn Power Company for	:	
Approval of a Default Service Program for	:	Docket No. P-2015-2511356
the Period Beginning June 1, 2017 through	:	
May 31, 2019	:	

**PREHEARING CONFERENCE MEMORANDUM
OF NOBLE AMERICAS ENERGY SOLUTIONS LLC**

AND NOW, comes Noble Americas Energy Solutions LLC (“Noble”), by its attorney, and submits this Prehearing Conference Memorandum in accordance with the Prehearing Conference Order of Administrative Law Judge David A. Salapa, dated November 6, 2015, and in connection with the Initial Prehearing Conference scheduled to be held in the above-captioned matter on December 1, 2015.

I. Introduction

On November 3, 2015, the FirstEnergy Service Companies – Metropolitan Edison Company, Pennsylvania Electric Company, Pennsylvania Power Company, and West Penn

Power Company (collectively referred to herein as “FirstEnergy”) – filed a joint petition with the Pennsylvania Public Utility Commission (“Commission”) seeking approval of their fourth Default Service Programs (“Programs”) to establish terms and conditions under which FirstEnergy will procure default service supplies, provide default service to non-shopping customers, satisfy requirements imposed by the Alternative Energy Portfolio Standards Act, and recover associated costs on a full and current basis for the period beginning June 1, 2017 through May 31, 2019. Notices of the filings of the respective FirstEnergy petitions were published in the *Pennsylvania Bulletin* on November 14, 2015, 45 Pa.B. 6654-6655.

Noble timely filed a Petition to Intervene in this proceeding on November 25, 2015. Noble incorporates by reference the statements and information provided in its Petition to Intervene and respectfully requests that Judge Salapa grant its intervention.

II. Counsel for Noble; Service List

The name, business addresses, telephone and fax numbers, and email address of counsel for Noble are:

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Noble designates the above counsel for purposes of inclusion on the official service list. Noble also requests that, in addition to the above counsel, Becky Merola, Government Affairs East for Noble (bmerola@noblesolutions.com), be included on the informal email distribution list established for this proceeding.

III. Issues

Noble is in the process of identifying the issues it may pursue in this proceeding. Upon completing its review of FirstEnergy's filing and direct testimony, Noble may support, oppose, or propose modifications to FirstEnergy's proposed Programs. Noble reserves the right to present its position in accordance with the litigation schedule which will be finalized at the Prehearing Conference.

IV. Witnesses

Noble is in the process of identifying any potential witnesses it might call and their intended subject matter. Noble agrees to notify Judge Salapa and the parties whether it will be submitting direct testimony in this proceeding and reserves the right to submit rebuttal and surrebuttal testimony as it deems appropriate. Noble will comply with all deadlines established in the proceeding for the service of testimony.

V. Evidence

Because Noble is still identifying the issues it may pursue and the witnesses it may call, it has not determined what evidence, if any, it might present at hearing. Noble anticipates that any evidence it would submit in the proceeding would consist of prepared direct testimony and accompanying exhibits of any witnesses. Noble also reserves the right to present additional evidence including, but not limited to, rebuttal and surrebuttal testimony and exhibits related thereto.

VI. Proposed Procedural Schedule

Noble will cooperate with Judge Salapa and the other parties at the prehearing conference to finalize a schedule for the submission of testimony, conducting evidentiary hearings, and submission of briefs.

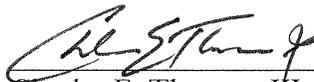
VII. Discovery

Noble will also cooperate with Judge Salapa and all parties at the prehearing conference to develop a proposed plan and schedule for discovery, as well as any reasonable and appropriate modifications to the Commission's Rules of Practice and Procedure for the conduct of discovery as are necessary.

VIII. Settlement

Noble will actively participate in settlement discussions as they may occur.

Respectfully submitted,



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Counsel for Noble Americas Energy Solutions LLC

DATED: November 30, 2015

CERTIFICATE OF SERVICE

I hereby certify that I have this 30th day of November, 2015, served a true and correct copy of the foregoing document upon the parties, listed below, via email and first class mail in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant):

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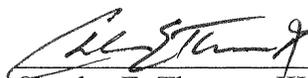
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