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November 30, 2015

VIA ELECTRONIC FILING

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

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 and P-2015-2511356

Dear Secretary Chiavetta:

Enclosed for filing is the Motion for Consolidation of Metropolitan Edison Company, Pennsylvania Electric Company, Pennsylvania Power Company and West Penn Power Company in the above-referenced matter.

Copies have been served on the parties in the manner indicated, as shown on the attached Certificate of Service.

Please feel free to contact me if you have any questions.

Sincerely,



Tori L. Giesler

Enclosures

c: As Per Certificate of Service

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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

**MOTION FOR CONSOLIDATION BY METROPOLITAN EDISON COMPANY,
PENNSYLVANIA ELECTRIC COMPANY, PENNSYLVANIA POWER COMPANY
AND WEST PENN POWER COMPANY**

Pursuant to 52 Pa. Code § 5.81, Metropolitan Edison Company (“Met-Ed”), Pennsylvania Electric Company (“Penelec”), Pennsylvania Power Company (“Penn Power”) and West Penn Power Company (“West Penn”) (each individually a “Company” and collectively, the “Companies”) hereby move that the four above-captioned proceedings be formally consolidated into a single proceeding. In support of their Motion, the Companies state as follows:

1. On November 3, 2015, the Companies filed the above-captioned Joint Petition requesting that the Pennsylvania Public Utility Commission (the “Commission”) approve their Default Service Programs (the “Program(s)”) for the period beginning June 1, 2017 through May 31, 2019. The Joint Petition was assigned four docket numbers, one for each Company: P-2015-2511333 (Met-Ed); P-2015-2511351 (Penelec); P-2015-2511355 (Penn Power); and P-2015-2511356 (West Penn).¹

¹ The Joint Petition was assigned four docket numbers for compliance filings and other such administrative purposes.

2. The Companies' proposed Programs contain coordinated procurement plans, contingency plans, rate design changes and tariffs. In addition, the Companies have proposed a single set of master protocols and agreements for default service supply procurement, solar photovoltaic alternative energy credit procurement, and their customer referral programs. Thus, each Company's Program involves a substantial number of common questions of law and fact.

3. Administrative resources would be used most effectively and efficiently, and administrative economy would be advanced, by the formal consolidation requested herein.

THEREFORE, for the foregoing reasons, the Companies request that the four separately-docketed proceedings regarding their Default Service Programs be formally consolidated.

Respectfully submitted,

Dated: November 30, 2015



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**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 No. P-2015-2511333
			P-2015-2511351
			P-2015-2511355
			P-2015-2511356

CERTIFICATE OF SERVICE

I hereby certify and affirm that I have this day served a copy of the Joint Petition of Metropolitan Edison Company, Pennsylvania Electric Company, Pennsylvania Power Company and West Penn Power Company for Approval of Their Default Service Programs on the following persons in the matter specified in accordance with the requirements of 52 Pa. Code § 1.54:

VIA FIRST CLASS AND ELECTRONIC MAIL

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Dated: November 30, 2015



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