

Deanne M. O'Dell  
717.255.3744  
dodell@eckertseamans.com

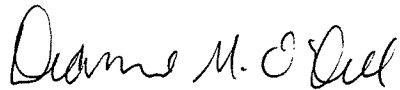
December 31, 2010

Rosemary Chiavetta, Secretary  
PA Public Utility Commission  
PO Box 3265  
Harrisburg, PA 17105-3265Re: The Retail Energy Supply Association v. Metropolitan Edison Company and  
Pennsylvania Electric Company, Docket Nos. C-2010-2178227, C-2010-2178216

Dear Secretary Chiavetta:

On behalf of the Retail Energy Supply Association ("RESA") enclosed please find the original of its Petition to Withdraw Complaints along with the electronic filing confirmation page with regard to the above-referenced matters. Copies are being served in accordance with the attached Certificate of Service.

Sincerely yours,



Deanne M. O'Dell, Esq.

DMO/lww  
Enclosurecc: Hon. Charles E. Rainey, Jr., w/enc  
Hon. Wayne L. Weismandel, w/enc.  
Cert. of Service w/enc.

**CERTIFICATE OF SERVICE**

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

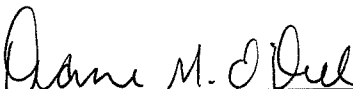
**Via Email and First Class Mail**

Thomas P. Gadsden, Esq.  
Kenneth M. Kulak, Esq.  
Anthony C. DeCusatis, Esq.  
Morgan Lewis & Bockius LLP  
1701 Market St.  
Philadelphia, PA 19103-2921  
[tgadsden@morganlewis.com](mailto:tgadsden@morganlewis.com)  
[kkulak@morganlewis.com](mailto:kkulak@morganlewis.com)  
[adecusatis@morganlewis.com](mailto:adecusatis@morganlewis.com)

Regina L. Matz, Esq.  
Thomas T. Niesen, Esq.  
Thomas Long Niesen & Kennard  
212 Locust St., Suite 500  
PO Box 9500  
Harrisburg, PA 17108-9500  
[rmatz@thomaslonglaw.com](mailto:rmatz@thomaslonglaw.com)  
[tniesen@thomaslonglaw.com](mailto:tniesen@thomaslonglaw.com)

Todd S. Stewart, Esq.  
Hawke McKeon & Sniscak, LLP  
100 North Tenth St.  
PO Box 1778  
Harrisburg, PA 17105-1778  
[tsstewart@hmslegal.com](mailto:tsstewart@hmslegal.com)

Aron J. Beatty, Esq.  
Tanya J. McCloskey, Esq.  
Office of Consumer Advocate  
555 Walnut St.  
5<sup>th</sup> Floor, Forum Place  
Harrisburg, PA 17101-1923  
[abeatty@paoca.org](mailto:abeatty@paoca.org)  
[tmccloskey@paoca.org](mailto:tmccloskey@paoca.org)

  
\_\_\_\_\_  
Deanne M. O'Dell, Esq.

Benjamin L. Willey  
Law Offices of Benjamin L. Willey, LLC  
7272 Wisconsin Avenue  
Suite 300  
Bethesda, MD 20814  
[blw@bwilleylaw.com](mailto:blw@bwilleylaw.com)

Dated: December 31, 2010

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

The Retail Energy Supply Association	:	
Complainant	:	
	:	Docket Nos. C-2010-2178227
v.	:	C-2010-2178216
	:	
Metropolitan Edison Company	:	
and	:	
Pennsylvania Electric Company	:	
Respondents	:	

---

**PETITION TO WITHDRAW  
COMPLAINTS OF THE RETAIL ENERGY SUPPLY ASSOCIATION**

---

Pursuant to 52 Pa. Code § 5.94(a), the Retail Energy Supply Association (“RESA”)<sup>1</sup> submits this Petition to Withdraw the complaints filed in the above-captioned matters. In support of this Petition, RESA states as follows:

1. On March 31, 2010, Metropolitan Edison Company (“MetEd”) filed Tariff Electric Pa. P.U.C. No. S-1 and Pennsylvania Electric Company (“Penelec” filed Tariff Electric Pa. P.U.C. No. S-1 (collectively, “Supplier Tariffs”). The Supplier Tariffs filed by MetEd and Penelec (collectively, “Companies”) had an effective date of January 1, 2011 and proposed changes to their exiting tariffs to set forth the rules and requirements for electric generation

---

<sup>1</sup> RESA’s members include ConEdison *Solutions*; Constellation NewEnergy, Inc.; Direct Energy Services, LLC; Energy Plus Holdings, LLC; Exelon Energy Company; GDF SUEZ Energy Resources NA, Inc.; Green Mountain Energy Company; Hess Corporation; Integrys Energy Services, Inc.; Just Energy; Liberty Power; NextEra Energy Services; Noble Americas Energy Solutions LLC; PPL EnergyPlus; Reliant Energy Northeast LLC. The comments expressed in this filing represent the position of RESA as an organization but may not represent the views of any particular member of RESA.

suppliers (“EGSs”) seeking to provide competitive generation service to customers in each utility’s service territory.

2. On May 21, 2010, RESA filed complaints against the Supplier Tariffs at the above captioned dockets requesting that the Commission suspend and investigate the substantive proposed changes regarding issues including the process for obtaining customer usage data, the supplier registration process, supplier credit requirements, billing options and billing requirements. RESA Complaint at ¶ 12.

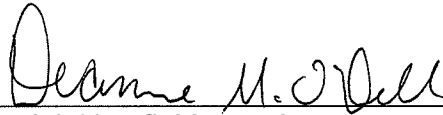
3. Subsequently, RESA and the Companies engaged in discussions about the concerns raised by RESA in its complaint. Consequently, by letter dated December 23, 2010, the Companies proposed a new effective date for the Supplier Tariffs of January 15, 2011 so that the parties could finalize their discussions.

4. Ultimately, the parties were able to agree on revised tariff language for some issues raised by RESA’s complaints and to establish a further process for continued discussions between the parties regarding other issues that could not be resolved through mutually agreed-to tariff language.

5. The mutually agreed-to tariff language is set forth in the Companies’ revised Supplier Tariffs that were filed on December 30, 2010. The revised Supplier Tariffs in combination with the Companies agreement to continue to work with RESA regarding the specific areas agreed-to between the parties, satisfies RESA’s concerns as set forth in its complaints.

WHEREFORE, RESA respectfully requests that its complaints in the above-captioned proceeding be withdrawn and that the Commission approve the Supplier Tariffs filed by the Companies on December 30, 2010.

Respectfully submitted,



---

Daniel Clearfield, Esquire  
Attorney ID 26183  
Deanne M. O'Dell, Esquire  
Attorney ID 81064  
Eckert Seamans Cherin & Mellott, LLC  
213 Market St., 8th Floor  
Harrisburg, PA 17101  
Tele: 717.237.6000  
Fax 717.237.6019  
dclearfield@eckertseamans.com  
dodell@eckertseamans.com

---

Attorneys for Retail Energy Supply Association

Dated: December 31, 2010