

October 6, 2014

VIA ELECTRONIC FILING

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street
P.O. Box 3265
Harrisburg, PA 17105-3265

Re: Pa. P.U.C. v. West Penn Power Company, Docket No. R-2014-2428742
Pa. P.U.C. v. Pennsylvania Electric Company, Docket No. R-2014-2428743
Pa. P.U.C. v. Pennsylvania Power Company, Docket No. R-2014-2428744
Pa. P.U.C. v. Metropolitan Edison Company, Docket No. R-2014-2428745

Dear Secretary Chiavetta:

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

Should you have any questions, please do not hesitate to contact me.

Very truly yours,

THOMAS, NIESEN & THOMAS, LLC

By



Charles E. Thomas, III

Encl.

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

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Pennsylvania Public Utility Commission	:	
v.	:	Docket No. R-2014-2428742
West Penn Power Company	:	
Pennsylvania Public Utility Commission	:	
v.	:	Docket No. R-2014-2428743
Pennsylvania Electric Company	:	
Pennsylvania Public Utility Commission	:	
v.	:	Docket No. R-2014-2428744
Pennsylvania Power Company	:	
Pennsylvania Public Utility Commission	:	
v.	:	Docket No. R-2014-2428745
Metropolitan Edison Company	:	

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

AND NOW, comes Noble Americas Energy Solutions LLC (“Noble”), by its attorneys, and submits this Initial Prehearing Conference Memorandum in accordance with the First Prehearing Order of Administrative Law Judge Dennis J. Buckley, dated September 30, 2014, and in connection with the Initial Prehearing Conference scheduled to be held in the above-captioned matters on October 8, 2014.

I. Introduction

On August 4, 2014, West Penn Power Company, Pennsylvania Electric Company, Pennsylvania Power Company, and Metropolitan Edison Company (collectively, “FirstEnergy”) submitted general base rate filings with the Pennsylvania Public Utility Commission (“Commission”) requesting comprehensive distribution rate increases. By Order entered October 2, 2014, the Commission acted to allow the tariff filings to be suspended by operation of

law and instituted an investigation into the lawfulness, justness and reasonableness of FirstEnergy's existing and proposed rates, rules and regulations.

On October 3, 2014, Noble filed a Petition to Intervene in this proceeding. Noble incorporates by reference the statements and information provided in its Petition to Intervene and respectfully requests that Judge Buckley grant its intervention.

II. Counsel for Noble

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 these proceedings.

III. Proposed Orders With Respect To Discovery

Noble is aware that other parties have already served discovery and agrees to cooperate with Judge Buckley and all other parties at the Initial Prehearing Conference to develop a proposed plan and schedule of 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.

IV. Proposed Litigation Schedule

Noble will cooperate with Judge Buckley and the other parties to finalize a schedule for the submission of testimony, hearings, and briefs at the Prehearing Conference. Noble has no objection, however, to the proposed litigation schedule presented in the First Prehearing Order which would require the filing of reply briefs by January 19, 2015.

V. Witnesses

Noble is in the process of identifying any potential witnesses it may call and their intended subject matter. Noble agrees to notify Judge Buckley 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.

VI. Issues

Noble is presently reviewing and analyzing the rather voluminous rate filings and related information submitted by FirstEnergy and, as of yet, has not identified the issues it may pursue in these proceedings. Upon completing its review, Noble may support, oppose or propose modifications to the proposed rate plans. Noble reserves the right to present its position in accordance with the litigation schedule which will be finalized at the Prehearing Conference.

VII. 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 would present at hearing. Noble anticipates that any evidence it would submit in the proceeding would consist of the 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.

VIII. Protective Orders

Noble understands that FirstEnergy distributed a proposed protective order for review to parties last week, but Noble has not received a copy or had a chance to review it.

IX. Consolidation of Proceedings

Noble has no objection to FirstEnergy's request to consolidate these proceedings.

Respectfully submitted,



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DATED: October 6, 2014

Pennsylvania Public Utility Commission v. West Penn Power Company	:	Docket No. R-2014-2428742
	:	
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	:	
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	:	
Pennsylvania Public Utility Commission v. Metropolitan Edison Company	:	Docket No. R-2014-2428745
	:	

CERTIFICATE OF SERVICE

I hereby certify that I have this 6th day of October, 2014, served a true and correct copy of the foregoing Initial Prehearing Conference Memorandum of Noble Americas Energy Solutions LLC, upon the persons below as follows:

VIA ELECTRONIC AND FIRST CLASS MAIL

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