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January 18, 2022

**VIA ELECTRONIC FILING**

Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street  
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 for the Period From June 1, 2023 through May 31, 2027; Docket Nos. P-2021-3030012, P-2021-3030013; P-2021-3030014; P-2021-3030021; **PETITION TO INTERVENE**

Dear Secretary Chiavetta:

Enclosed for filing with the Commission is the Petition to Intervene of Shipley Choice, LLC d/b/a Shipley Energy in the above-captioned proceedings. Copies of this Petition have been served in accordance with the attached Certificate of Service.

Thank you for your attention to this matter. If you have any questions related to this filing, please do not hesitate to contact me.

Very truly yours,

Todd S. Stewart  
Counsel for  
Shipley Choice, LLC d/b/a Shipley Energy

TSS/jld

Enclosure

cc: Administrative Law Judge Jeffrey A. Watson (via email – [jeffwatson@pa.gov](mailto:jeffwatson@pa.gov))  
Legal Assistant Nick Miskanic (via email – [nmiskanic@pa.gov](mailto:nmiskanic@pa.gov))  
Per Certificate of Service

## CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the foregoing document upon the parties, listed below, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a party).

### VIA ELECTRONIC MAIL ONLY

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DATED: January 18, 2022

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Todd S. Stewart

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Joint Petition of Metropolitan Edison Company,	:	
Pennsylvania Electric Company, Pennsylvania	:	
Power Company, and West Penn Power	:	Docket Nos. P-2021-3030012
Company for Approval of their Default Service	:	P-2021-3030013
Programs for the Period From June 1, 2023	:	P-2021-3030014
through May 31, 2027	:	P-2021-3030021

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**PETITION TO INTERVENE  
OF SHIPLEY CHOICE LLC, D/B/A  
SHIPLEY ENERGY**

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NOW COMES Shipley Choice, LLC d/b/a Shipley Energy (“Shipley”), by and through its counsel, Hawke McKeon & Sniscak, LLP, and hereby petitions the Pennsylvania Public Utility Commission (“Commission”) to intervene in the above-captioned proceeding pursuant to 52 Pa. Code §5.71. *et. seq.* As discussed more fully below, Shipley is a licensed electric generation supplier (“EGS”) providing electric generation supply service using the jurisdictional facilities of Metropolitan Edison Company, Pennsylvania Electric Company, Pennsylvania Power Company, and West Penn Power Company (“Companies”). In support of its Petition to Intervene, Shipley states and avers as follows:

1. On December 14, 2021, the Companies filed a Joint Petition for Approval of Default Service Plan (Petition or Joint Petition) at the Docket Numbers identified above. The Petition was filed pursuant to Section 2807(e) of the Public Utility Code.

2. On January 3, 2022, Presiding Administrative Law Judge, The Honorable Jeffrey A. Watson, issued a Prehearing Conference Order requiring that all Petitions to Intervene be filed

no later than January 18, 2022, and setting the date and time for a Prehearing Conference on January 21, 2022, at 10:00 AM.

3. Shipley is a licensed electric generation supplier providing service in the service territories of the Companies. Shipley is represented in this matter by the following counsel:

Todd S. Stewart  
PA Attorney I.D. # 75556  
Hawke McKeon & Sniscak, LLP  
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4. Shipley currently serves customers on the Companies' systems. As such, Shipley has a direct and immediate interest in any modifications to the terms and conditions of the Companies' default service programs, which will have a direct impact Shipley's ability to serve customers and Shipley has a clear interest in any tariff provisions or other requirements, whether new or existing, that directly have impacted or will impact its ability to reasonably and fairly serve customers on the Companies' systems.

5. In particular, Shipley is concerned that the Companies are proposing to extend the period over which the default service is reconciled, from 3 months to 6 months, and the impact that such a change, and other proposed changes premised on the move to a 6-month default service price, will have on Shipley's current ability to operate in the Companies' service territories. Shipley also is concerned that as digital commerce becomes the norm, that the present configuration of the Companies' SOP programs does not allow for online enrollments. Shipley believes the program must be updated or face the possibility of becoming less impactful over time.

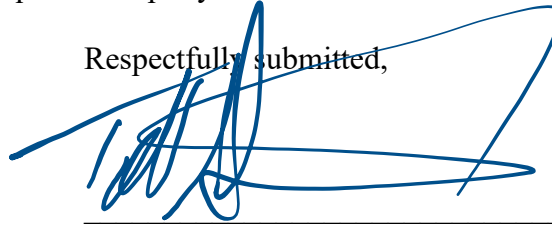
6. In this matter, the Companies' proposal to extend the reconciliation period and default rate effectiveness is the major issue that Shipley will address. Shipley reserves the right to

address other positions as may be warranted in testimony, briefs, and other submissions as appropriate.

7. Because Shipley serves customers in the service territories of the Companies, where it is licensed, the proposals in the Companies' default service plans will have a direct and immediate impact on Shipley, and Shipley's interest is therefore substantial, and cannot be represented by any other party to this proceeding. Shipley clearly will be bound by any decision that the Commission might make with regard to the Companies' proposed changes. Therefore, Shipley requests that its intervention be granted and that it be allowed full party status in this matter.

**WHEREFORE**, Shipley hereby petitions the Pennsylvania Public Utility Commission to intervene in the above-captioned matter and requests full party status.

Respectfully submitted,



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DATED: January 18, 2022