Morgan Lewis

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January 20, 2022

VIA ELECTRONIC FILING

Rosemary Chiavetta, Secretary Pennsylvania Public Utility Commission Commonwealth Keystone Building 400 North Street 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 <u>Docket Nos. P-2021-3030012, P-2021-3030013, P-2021-3030014 and P-2021-3030021</u>

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 for Approval of Their Default Service Programs ("Motion").

Copies of the Motion have been served on Administrative Law Judge Jeffrey A. Watson and the parties listed on the enclosed Certificate of Service in the manner indicated.

If you have any questions, please do not hesitate to contact me directly at 215.963.5384.

Very truly yours,

M. Julik

Kenneth M. Kulak

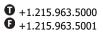
Enclosures

c: Per Certificate of Service

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Morgan, Lewis & Bockius LLP

1701 Market Street Philadelphia, PA 19103-2921 United States



BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

JOINT PETITION OF	:	DOCKET NO. P-2021-3030012
METROPOLITAN EDISON COMPANY,	:	
PENNSYLVANIA ELECTRIC	:	DOCKET NO. P-2021-3030013
COMPANY, PENNSYLVANIA POWER	:	
COMPANY, AND WEST PENN POWER	:	DOCKET NO. P-2021-3030014
COMPANY, FOR APPROVAL OF	:	
THEIR DEFAULT SERVICE	:	DOCKET NO. P-2021-3030021
PROGRAMS	:	

CERTIFICATE OF SERVICE

I hereby certify and affirm that I have this day served copies of the Motion for

Consolidation on behalf of Metropolitan Edison Company, Pennsylvania Electric

Company, Pennsylvania Power Company, and West Penn Power Company on the persons

listed below, in the manner specified in accordance with the requirements of 52 Pa. Code § 1.54:

VIA ELECTRONIC MAIL

Administrative Law Judge Jeffrey A. Watson 301 5th Avenue Piatt Place - Suite 220 Pittsburgh, PA 15222 jeffwatson@pa.gov nmiskanic@pa.gov

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Counsel for Metropolitan Edison Company, Pennsylvania Electric Company, Pennsylvania Power Company, and West Penn Power Company

Dated: January 20, 2022

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

JOINT PETITION OF METROPOLITAN	:	
EDISON COMPANY, PENNSYLVANIA	: DOCKET NOS.	P-2021-3030012
ELECTRIC COMPANY, PENNSYLVANIA	:	P-2021-3030013
POWER COMPANY AND WEST PENN	:	P-2021-3030014
POWER COMPANY FOR APPROVAL OF	:	P-2021-3030021
THEIR DEFAULT SERVICE 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-referenced proceedings be formally consolidated into a single proceeding. In support of their Motion, the Companies state as follows:

1. On December 14, 2021, the Companies filed the above-captioned Joint Petition requesting that the Pennsylvania Public Utility Commission (the "Commission") approve their sixth Default Service Programs (the "Program(s)" or "DSP VI") for the period beginning June 1, 2023 through May 31, 2027. The Joint Petition was assigned four docket numbers, one for each Company: P-2021-3030012 (Met-Ed); P-2021-3030013 (Penelec); P-2021-3030014 (Penn Power); and P-2021-3030021(West Penn).¹

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, long-term

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

solar energy and solar photovoltaic alternative energy credit procurement, and their customer referral programs during the DSP VI term. 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 separatelydocketed proceedings regarding their Default Service Programs be formally consolidated.

Respectfully submitted,

A. M. Lalah

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Counsel for Metropolitan Edison Company, Pennsylvania Electric Company, Pennsylvania Power Company and West Penn Power Company

Dated: January 20, 2022