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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
Docket Nos. P-2021-3030012, P-2021-3030013, P-2021-3030014 and P-2021-3030021

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,



Kenneth M. Kulak

Enclosures

c: Per Certificate of Service

DB1/ 126968511.1

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**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

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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 separately-docketed proceedings regarding their Default Service Programs be formally consolidated.

Respectfully submitted,



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Dated: January 20, 2022