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January 20, 2022

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor
Harrisburg, PA 17120

VIA ELECTRONIC FILING

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:

Attached for filing with the Pennsylvania Public Utility Commission is the Prehearing Memorandum of the Met-Ed Industrial Users Group ("MEIUG"), the Penelec Industrial Customer Alliance ("PICA"), and the West Penn Power Industrial Intervenors ("WPPII"), in the above-referenced proceedings.

As shown by the attached Certificate of Service, all parties to these proceedings are being duly served with a copy of this filing. If you have any questions regarding the documents, please feel free to contact the undersigned. Thank you.

Sincerely,

A handwritten signature in black ink that reads 'Charis Mincavage'.

Charis Mincavage
MCNEES WALLACE & NURICK LLC

Counsel to the Met-Ed Industrial Users Group,
the Penelec Industrial Customer Alliance, and
the West Penn Power Industrial Intervenors

CM/ams

Enclosures

c: Administrative Law Judge Jeffrey A. Watson (via E-Mail)
Nick Miskanic, Legal Assistant (via E-Mail)
Certificate of Service

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true and correct copy of the foregoing document upon the participants, listed below, in accordance with the requirements of Section 1.54 (relating to service by a participant).

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Counsel to the Met-Ed Industrial Users
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Dated this 20th day of January, 2022, in Harrisburg, Pennsylvania

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Joint Petition of Metropolitan Edison	:	
Company, Pennsylvania Electric Company,	:	Docket Nos. P-2021-3030012
Pennsylvania Power Company, and West	:	P-2021-3030013
Penn Power Company for Approval of	:	P-2021-3030014
Their Default Service Programs	:	P-2021-3030021

**JOINT PREHEARING MEMORANDUM OF
THE MET-ED INDUSTRIAL USERS GROUP,
THE PENELEC INDUSTRIAL CUSTOMER ALLIANCE, AND
THE WEST PENN POWER INDUSTRIAL INTERVENORS**

Pursuant to the January 3, 2022, Prehearing Order issued by Administrative Law Judge ("ALJ") Jeffrey A. Watson, the Met-Ed Industrial Users Group ("MEIUG"), the Penelec Industrial Customer Alliance ("PICA"), and the West Penn Power Industrial Intervenors ("WPPII") (collectively, the "Industrials"), hereby submit this Prehearing Memorandum in the above-captioned proceedings.

I. HISTORY OF THE PROCEEDINGS

On December 14, 2021, the Metropolitan Edison Company ("Met-Ed"), Pennsylvania Electric Company ("Penelec"), Pennsylvania Power Company ("Penn Power"), and West Penn Power Company ("West Penn") (collectively, "Companies") petitioned the Pennsylvania Public Utility Commission ("PUC" or "Commission") for approval of a proposed plan for the terms and conditions under which the Companies would supply default service from June 1, 2023, through May 31, 2027.¹

¹ *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, *et al.* (Dec. 14, 2021) ("Joint Petition" or "DSP VI").

On January 14, 2022, the Industrials filed a Joint Petition to Intervene in these proceedings. A description of the Industrials is set forth in Paragraphs 1 and 2 of the Joint Petition to Intervene.

A Prehearing Conference has been scheduled in these proceedings for January 21, 2022. The Industrials plan to attend the Prehearing Conference telephonically.

II. SERVICE LIST

For purposes of service in the above-captioned proceedings, please direct all communications to:

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III. ANTICIPATED ISSUES AND SUB-ISSUES

As users of substantial volumes of electricity in the Companies' service territories, the Industrials are in a unique position to comment to the Commission on the customer impact of the proposed DSP VI and the consequences for Large Commercial and Industrial ("C&I") customers. The Industrials are concerned with issues regarding the terms and conditions of their members' electricity service, and, therefore, intend to examine issues related to the applicability of the Companies' proposed DSP VI to Large C&I customers. The Industrials also reserve the right to raise further issues as necessary and appropriate during the course of these proceedings and to respond to issues raised by other parties.

IV. PROPOSED WITNESSES

The Industrials are evaluating whether they will sponsor testimony in these proceedings. If the Industrials decide to sponsor testimony, they will inform the parties and the ALJ of any intended witnesses and topics of testimony. The Industrials also intend to participate in these proceedings through the submission of discovery, cross-examination of other parties' witnesses, and the submission of briefs, exceptions, and reply exceptions, if necessary.

V. PROPOSED SCHEDULE AND DISCOVERY RULES

The Industrials will cooperate with the ALJ and the parties at the Prehearing Conference to develop an appropriate procedural schedule, including whether a hearing is needed, and, if required, the amount of hearing time necessary, and discovery rules in accordance with the Commission's regulations and any directives issued by the ALJ.

VI. POSSIBILITY OF SETTLEMENT

The Industrials are willing to participate in settlement discussions with the other parties to amicably resolve the issues in these proceedings, subject to Commission approval.

Respectfully submitted,

McNEES WALLACE & NURICK LLC

By *Charis Mincavage*

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Dated: January 20, 2022