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March 9, 2026

VIA ELECTRONIC FILING

Secretary Matthew Homsher
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17120

**Re: Petition of FirstEnergy Pennsylvania Electric Company for Approval of Its
Default Service Program for the Period from June 1, 2027 to May 31, 2031
Docket No. P-2026-3060298**

Dear Secretary Homsher:

Enclosed for filing please find the Petition to Intervene of WGL Energy Services, Inc. in the above-referenced proceeding. Copies of this filing have been served in accordance with the attached Certificate of Service.

Thank you, and please do not hesitate to contact me if you have any questions or concerns.

Best Regards,

STEVENS & LEE



Michael A. Gruin, Esq.

Encl.

cc: Deputy Chief Administrative Law Judge Mark A. Hoyer (via email)
Administrative Law Judge Erin L. Gannon (via email)
Certificate of Service

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of FirstEnergy Pennsylvania :
Electric Company for Approval of Default : Docket No. P-2026-3060298
Service Program for the Period from :
June 1, 2027 to May 31, 2031 :

PETITION TO INTERVENE OF WGL ENERGY SERVICES, INC.

AND NOW COMES, WGL Energy Services, Inc. (“WGLES”) by and through its counsel, pursuant to 52 Pa. Code § 5.71. *et. seq.*, and files this Petition to Intervene (“Petition”) in the above-captioned proceeding before the Pennsylvania Public Utility Commission (“Commission”).

In support of this Petition, WGLES avers as follows:

I. BACKGROUND

1. On February 3, 2026, FirstEnergy Pennsylvania Electric Company (“FirstEnergy” or the “Company”) filed a Petition for Approval of Default Service Program (“DSP Petition”) at the above-referenced docket which contained proposed terms and conditions under which FirstEnergy would procure and supply default electric service between June 1, 2027, and May 31, 2031.¹

2. On February 10, 2026, the Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania (“CAUSE-PA”) filed a Petition to Intervene and Answer.

3. Also on February 10, 2026, the Commission issued a Call-In Telephonic Prehearing Conference Notice, scheduling a Telephonic Prehearing Conference for March 19, 2026.

4. On February 11, 2026, the Office of Small Business Advocate (“OSBA”) filed a Notice of Appearance.

¹ *Petition of FirstEnergy Pennsylvania Electric Company for Approval of its Default Service Program for the Period June 1, 2027 to May 31, 2031*, Docket No. P-2026-3060298 (Petition filed Feb. 3, 2026).

5. On February 12, 2026, the Office of Consumer Advocate (“OCA”) filed a Notice of Appearance.

6. On or around February 18, 2026, Deputy Chief Administrative Law Judge Mark A. Hoyer and Administrative Law Judge Erin L. Gannon (collectively, the “ALJs”) issued a Prehearing Conference Order.

7. On February 19, 2026, Penn Renewables LLC (“Penn Renewables”) filed a Petition to Intervene.

8. On February 20, 2026, the OSBA filed a Notice of Intervention, Public Statement, and Verification.

9. On February 21, 2023, the Telephonic Prehearing Conference Notice was published in the Pennsylvania Bulletin.

10. On February 23, 2026, Shipley Choice, LLC d/b/a Shipley Energy and Interstate Gas Supply, LC d/b/a IGS Energy filed a Petition to Intervene.

11. On February 24, 2026, the Met-Ed Industrial Users Group (“MEIUG”), the Penelec Industrial Customer Alliance (“PICA”), and the West Penn Power Industrial Intervenors (“WPPII”) filed a Joint Petition to Intervene.

12. On March 5, 2026 Dimension PA 1 LLC filed a Petition to Intervene.

13. WGLES is a licensed electric generation supplier (“EGS”) in the Commonwealth of Pennsylvania and first began serving commercial and residential customers in Pennsylvania at the beginning of 2010, including in the service territories of First Energy Pennsylvania. WGLES has served electricity supply markets since 2000 in Maryland, 2001 in the District of Columbia and 2006 in Delaware in accordance with the start of electric choice programs in those jurisdictions, and is also currently licensed as a retail supplier in the states of New Jersey and Ohio.

14. WGLES has participated in various Commission proceedings related to electricity competition issues, including the Commission’s Investigation of Pennsylvania’s Retail Electricity Markets, the Commission’s Rulemaking Regarding Marketing and Sales Practices for the Retail Residential Energy Market (Dkt. No. L-2010-2208332), the Commission’s proceedings regarding Interim Guidelines for Eligible Customer Lists (Dkt. No. M-2010-2183412) and Net-Metering Policy (Dkt no. M-2011- 2249441), the Petition of Direct Energy Services, LLC to expand retail market enhancements (Dkt. No.P-2016-2535033), the First Energy CAP Shopping Program Implementation and Customer Referral Program proceeding (Dkt. Nos. P-2017-2637855, et al), the En Banc Hearing on Implementation of Supplier Consolidated Billing (Docket No. M-2018-2645254), the Rulemaking Regarding Electricity Generation Customer Choice (Dkt. No. L-2017-0228991), the Electric Distribution Company Default Service Plans – Customer Assistance Program Shopping proceeding at Docket No. M-2018-3006578) as well as the First Energy Companies’ Default Service Plan proceeding at Docket Nos. P-2011-2273650, P-2011-2273668, P-2011-2273669, and P-2011-2273670.

15. The attorney for WGLES in this matter is:

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16. The Commission’s regulations at 52 Pa. Code § 5.72(a) provide that “A petition to intervene may be filed by a person claiming a right to intervene or an interest of such nature that

intervention is necessary or appropriate to the administration of the statute under which the proceeding is brought. The right or interest may be one of the following:

- a. A right conferred by statute of the United States or of the Commonwealth.
- b. An interest which may be directly affected and which is not adequately represented by existing participants, and as to which the petitioner may be bound by the action of the Commission in the proceeding.
- c. Another interest of such nature that participation of the petitioner may be in the public interest.

17. WGLES clearly meets the standard for intervention. The Default Service Petition includes several proposals that will directly impact WGLES, including a proposal to eliminate purchase of receivables for certain categories of retail supply offerings, an unprecedented proposal to eliminate certain types of automatic contract renewals that are currently permitted by the Commission's regulations and a proposal for new customer consent requirements for continued service.

18. As an EGS operating in the service territories of First Energy Pennsylvania, WGLES will be directly impacted by the final structure of the First Energy Default Service Program.

19. Furthermore, WGLES seeks to participate to ensure that the First Energy Default Service Program complies with any further directives that the Commission may issue regarding the structure of default service plans.

20. The interests of WGLES are not represented by any other participant in this proceeding, the outcome of which will be binding upon WGLES. While other EGSs will likely intervene in this proceeding, EGSs are not uniform in their position on the variety of issues

involved in the Default Service Program. WGLES has views on issues that differ from other EGSs, and unless WGLES is permitted to intervene, such views will not be represented in this proceeding.

21. Because WGLES has a direct and substantial interest in this proceeding, and because no other entity can represent WGLES's interests, WGLES's Petition to Intervene should be granted.

22. Because this proceeding is still in its preliminary stages, WGLES is still in the process of formulating its positions on the proposed Default Service Program. WGLES will finalize its positions on the various issues in this proceeding after reviewing the testimony and the other materials to be provided by First Energy.

WHEREFORE, WGL Energy Services, Inc. respectfully requests that its Petition to Intervene be granted and that it be accorded full party status in the above-captioned proceeding.

Respectfully submitted,

STEVENS & LEE, P.C.



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**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of FirstEnergy Pennsylvania :
Electric Company for Approval of Default : Docket No. P-2026-3060298
Service Program for the Period from :
June 1, 2027 to May 31, 2031 :

VERIFICATION

I, Todd Sandford, holding the position of VP Operations with WGL Energy Services, Inc. verify that the factual allegations contained in the foregoing Petition to Intervene are true and correct to the best of my knowledge, information, and belief. I understand that false statements herein are made subject to the penalties of 18 Pa. C.S. §4904, relating to unsworn falsifications to authorities.

Todd R Sandford

Date: 3/6/26

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

PETITION OF FIRSTENERGY :
 PENNSYLVANIA ELECTRIC :
 COMPANY FOR APPROVAL OF ITS :
 DEFAULT SERVICE PROGRAM FOR : Docket No. P-2026-3060298
 THE PERIOD JUNE 1, 2027 TO MAY 31, :
 2031 :
 :

CERTIFICATE OF SERVICE

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

VIA FIRST-CLASS MAIL

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<p>Mitchell H. Kizner, Esq. Flaster Greenberg, PC Commerce Center 1810 Chapel Avenue W Cherry Hill, NJ 08002 mitchell.kizner@flastergreenberg.com <i>Counsel to Dimension PA 1 LLC</i></p>	



Dated: March 9, 2026

Michael Guin