

**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 :

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**PETITION TO INTERVENE OF TOWN SQUARE ENERGY EAST, LLC**

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Town Square Energy East, LLC (“Town Square”) by and through its counsel, pursuant to 52 Pa. Code § 5.71. *et. seq.*, files this Petition to Intervene (“Petition”) in the above-captioned proceeding before the Pennsylvania Public Utility Commission (“Commission”). In support of this Petition, Town Square 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 Plan (“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.<sup>1</sup>

2. On February 10, 2026, the Commission issued a Call-In Telephonic Prehearing Conference Notice, scheduling a Telephonic Prehearing Conference for March 19, 2026, at 10:00 a.m.

3. 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.

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<sup>1</sup> *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).

4. On February 21, 2026, the Telephonic Prehearing Conference Notice was published in the Pennsylvania Bulletin.

## **II. Proposed Intervenor**

5. Town Square is a licensed electric generation supplier (“EGS”) in the Commonwealth of Pennsylvania and serves residential customers in Pennsylvania, including in the service territories of First Energy Pennsylvania.<sup>2</sup>

6. The attorneys for Town Square in this matter are:

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## **III. Town Square Meets the Standards for Intervention**

7. 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.

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<sup>2</sup> Town Square’s license was issued on March 17, 2011 in Docket No. A-2010-2199551. The license was issued under Town Square’s prior name (“Discount Energy Group, LLC”). By Secretarial Letter issued on July 21, 2015, the Commission approved the change of the company’s name to Town Square Energy East, LLC and issued a new license reflecting the changed name.

- 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.

8. Town Square meets the standards for intervention in this proceeding. First Energy's Default Service Plan includes several proposed changes to its Purchases of Receivables processes which, if approved, would materially impact the ability of Towns Square to offer certain retail electricity supply products in First Energy Territory.

9. First Energy's Default Service Plan includes proposals that would limit customer contract renewals and require additional notices that are not required by the Public Utility Code or the Commission's regulations, which, if enacted, will significantly impact Town's Square's relations with existing and prospective customers.

10. These proposals by First Energy Pennsylvania directly contravene well-established Commission regulations that were promulgated through formal rulemaking processes after notice and the opportunity for input by interested parties.

11. Town Square will be bound by the outcome of the First Energy Pennsylvania's Default Service Proceeding. As such, allowing First Energy Pennsylvania to impose a parallel set of rules that apply only in its service territory without providing Town Square the opportunity to participate in this proceeding would violate Town Square's due process rights.

12. Town Square also has an interest in participating in the proceeding in order examine and respond to other proposals that may be submitted by other parties during the course of the proceeding to protect its rights and interests, and the interests of its customers.

13. Town Square's interests are not represented by any other participant in this proceeding. While other EGSs may intervene in this proceeding, EGSs are not uniform in their position on the variety of issues involved in the Default Service Plan. Town Square has views on issues that differ from other EGSs, and unless Town Square is permitted to intervene, such views will not be represented in this proceeding.

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

15. Because this proceeding is still in its preliminary stages, Town Square reserves the right to raise and address additional issues identified through its continued review and analysis of the filing (and related information), or other issues raised by the parties in this proceeding

**WHEREFORE**, Town Square Energy East, LLC 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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**VERIFICATION**

I, Randal Miller , holding the position of Vice President with Town Square Energy East, LLC 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.



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Date: 03-09-2026

**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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Dated: March 9, 2026

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Michael Guin