



Todd S. Stewart  
717.703.0806  
[tsstewart@hmslegal.com](mailto:tsstewart@hmslegal.com)

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501 Corporate Circle, Suite 302, Harrisburg, PA 17110 Phone: 717.236.1300 Fax: 717.236.4841 [www.hmslegal.com](http://www.hmslegal.com)

March 17, 2026

**VIA ELECTRONIC FILING**

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

RE: Petition of FirstEnergy Pennsylvania Electric Company for Approval of Default Service Program for the Period From June 1, 2027 through May 31, 2031; Docket No. P-2026-3060298; **PREHEARING CONFERENCE MEMORANDUM OF SHIPLEY CHOICE, LLC D/B/A SHIPLEY ENERGY AND INTERSTATE GAS SUPPLY, LLC D/B/A IGS ENERGY**

Dear Secretary Homsher:

Enclosed for filing with the Pennsylvania Public Utility Commission is the Prehearing Conference Memorandum of Shipley Choice, LLC d/b/a Shipley Energy and Interstate Gas Supply, LLC d/b/a IGS Energy (collectively "EGS Parties") in the above-captioned docket. Copies of this Memorandum have been served as indicated on the attached Certificate of Service.

Thank you for your attention to this matter. If you have any questions related to this filing, please do not hesitate to contact my office.

Very truly yours,

A handwritten signature in blue ink, appearing to read "Todd S. Stewart", is written over a horizontal line.

Todd S. Stewart  
*Counsel for Shipley Choice, LLC d/b/a  
Shipley Energy and Interstate Gas Supply,  
LLC d/b/a IGS Energy*

TSS/jld

Enclosure

cc: Deputy Chief Administrative Law Judge Mark A. Hoyer (via electronic mail – [mhoyer@pa.gov](mailto:mhoyer@pa.gov))  
Administrative Law Judge Erin L. Gannon (via electronic mail – [egannon@pa.gov](mailto:egannon@pa.gov))  
Per Certificate of Service

## CERTIFICATE OF SERVICE

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

### VIA ELECTRONIC MAIL

Kenneth M. Kulak, Esquire  
Brooke E. McGlinn, Esquire  
Morgan, Lewis & Bockius LLP  
2222 Market Street  
Philadelphia, PA 19103  
[Ken.kulak@morganlewis.com](mailto:Ken.kulak@morganlewis.com)  
[Brooke.mcglinn@morganlewis.com](mailto:Brooke.mcglinn@morganlewis.com)  
*Counsel for FirstEnergy Pennsylvania  
Electric Company*

Tori L. Giesler  
Angelina Umstead  
FirstEnergy Service Company  
341 White Pond Drive  
Akron, OH 44320  
[tgiesler@firstenergycorp.com](mailto:tgiesler@firstenergycorp.com)  
[aumstead@firstenergycorp.com](mailto:aumstead@firstenergycorp.com)  
*Counsel for FirstEnergy Pennsylvania  
Electric Company*

Elizabeth R. Marx, Esquire  
Lauren N. Berman, Esquire  
Ria M. Pereira, Esquire  
John W. Sweet, Esquire  
Levi A. Phillips, Esquire  
Pennsylvania Utility Law Project  
118 Locust Street  
Harrisburg, PA 17101  
[pulp@pautilitylawproject.org](mailto:pulp@pautilitylawproject.org)  
*Counsel for CAUSE-PA*

Rebecca Lyttle, Esquire  
Commonwealth of Pennsylvania  
Office of Small Business Advocate  
Forum Place  
555 Walnut Street, 1<sup>st</sup> Floor  
Harrisburg, PA 17101  
[relyttle@pa.gov](mailto:relyttle@pa.gov)

Michael A. Podskoch, Jr., Esquire  
Adam J. Williams, Esquire  
Pennsylvania Public Utility Commission  
Bureau of Investigation & Enforcement  
Commonwealth Keystone Building  
400 North Street  
Harrisburg, PA 17120  
[mpodskoch@pa.gov](mailto:mpodskoch@pa.gov)  
[adawilliam@pa.gov](mailto:adawilliam@pa.gov)

Harrison W. Breitman, Esquire  
Katherine "Katie" Kennedy, Esquire  
Olivia M. Spergel, Esquire  
Office of Consumer Advocate  
Forum Place  
555 Walnut Street, 5<sup>th</sup> Floor  
Harrisburg, PA 17101-1923  
[OCAFEPADSP26@paoca.org](mailto:OCAFEPADSP26@paoca.org)

Melissa A. Chapaska, Esquire  
HMS Legal LLP  
501 Corporate Circle, Suite 302  
Harrisburg, PA 17110  
[machapaska@hmslegal.com](mailto:machapaska@hmslegal.com)  
*Counsel for Penn Renewables LLC*

Susan E. Bruce, Esquire  
Charis Mincavage, Esquire  
Matthew Garber, Esquire  
Rebecca Kimmel, Esquire  
McNees Wallace & Nurick LLC  
100 Pine Street  
P.O. Box 1166  
Harrisburg, PA 17108  
[sbruce@mcneeslaw.com](mailto:sbruce@mcneeslaw.com)  
[cmincavage@mcneeslaw.com](mailto:cmincavage@mcneeslaw.com)  
[mgarber@mcneeslaw.com](mailto:mgarber@mcneeslaw.com)  
[rkimmel@mcneeslaw.com](mailto:rkimmel@mcneeslaw.com)  
*Counsel for the Industrial Customer Groups*

Michael Gruin, Esquire  
Donald Wagner, Esquire  
17 N. 2<sup>nd</sup> Street, 16<sup>th</sup> Floor  
Harrisburg, PA 17101  
[Michael.gruin@stevenslee.com](mailto:Michael.gruin@stevenslee.com)  
[Donald.wagner@stevenslee.com](mailto:Donald.wagner@stevenslee.com)  
*Counsel for Town Square Energy East, LLC  
and WGL Energy Services, Inc.*

Colleen Kartychak, Esquire  
Constellation Energy Generation, LLC  
1310 Point Street  
Baltimore, MD 21231  
[Colleen.kartychak@constellation.com](mailto:Colleen.kartychak@constellation.com)  
*Counsel for CEG*

Samuel W. Cortes, Esquire  
Fox Rothschild LLP  
747 Constitution Drive, Suite 100  
Exton, PA 19341  
[scortes@foxrothschild.com](mailto:scortes@foxrothschild.com)  
*Counsel for the Joint Solar Advocates*

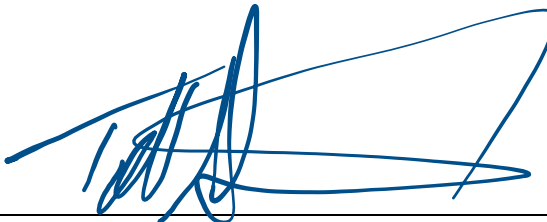
Daniel B. Markind, Esquire  
Flaster Greenberg, PC  
1717 Arch Street, Suite 3300  
Philadelphia, PA 19103  
[Daniel.markind@flastergreenberg.com](mailto:Daniel.markind@flastergreenberg.com)  
*Counsel for Dimension PA I LLC*

Nicholas A. Stobbe, Esquire  
Stevens & Lee, P.C.  
17 N. 2<sup>nd</sup> Street, 16<sup>th</sup> Floor  
Harrisburg, PA 17101  
[Nicholas.stobbe@stevenslee.com](mailto:Nicholas.stobbe@stevenslee.com)  
*Counsel for the Customer-Generator  
Coalition*

Whitney E. Snyder, Esquire  
Eric W. Struble, Esquire  
HMS Legal LLP  
501 Corporate Circle, Suite 302  
Harrisburg, PA 17110  
[wesnyder@hmslegal.com](mailto:wesnyder@hmslegal.com)  
[ewstruble@hmslegal.com](mailto:ewstruble@hmslegal.com)  
*Counsel for The Pennsylvania State  
University*

Aron J. Beatty, Esquire  
Duquesne Light Company  
800 N. Third Street  
Harrisburg, PA 17402  
[abeatty@duqlight.com](mailto:abeatty@duqlight.com)  
*Counsel for Duquesne Light Company*

DATED: March 17, 2026



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Todd S. Stewart

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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

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**PREHEARING CONFERENCE MEMORANDUM  
OF SHIPLEY CHOICE, LLC D/B/A SHIPLEY ENERGY  
AND INTERSTATE GAS SUPPLY, LLC D/B/A IGS ENERGY**

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**TO THE HONORABLE MARK A. HOYER:  
TO THE HONORABLE ERIN L. GANNON:**

Pursuant to 52 Pa. Code § 5.222 and the Prehearing Conference Order in this proceeding issued February 19, 2026, Shipley Choice, LLC d/b/a Shipley Energy (“Shipley”) and Interstate Gas Supply, LLC d/b/a IGS Energy (“IGS”) (collectively “EGS Parties”), by and through their counsel, HMS Legal LLP, hereby file this Prehearing Conference Memorandum.

**I. INTRODUCTION**

On February 3, 2026, FirstEnergy Pennsylvania Electric Company (“FE”) filed a Petition for Approval of Its Default Service Program for the Period June 1, 2027 to May 31, 2031 (“DSP VII Petition”) pursuant to Section 2807(e) of the Public Utility Code. Through a Petition to Intervene submitted on February 24, 2026, the EGS Parties seek to become a party to this proceeding, to ensure that their interest as electric generation suppliers (“EGS”) serving customers on FE’s distribution systems is adequately represented. The EGS Parties intend to call into the initial Prehearing Conference scheduled for March 19, 2026.

## **II. SERVICE**

The EGS Parties consent to accept electronic delivery of documents and respectfully requests that service be made to the following:

Todd S. Stewart, PA Attorney I.D. No. 75556  
HMS Legal LLP  
501 Corporate Circle, Suite 302  
Harrisburg, PA 17110  
Telephone: (717) 236-1300  
Facsimile: (717) 236-4841  
Email: [tsstewart@hmslegal.com](mailto:tsstewart@hmslegal.com)

## **III. ANTICIPATED ISSUES**

The EGS Parties are at this time still formulating their positions on the issues presented by the DSP VII Petition. Based on preliminary review, the EGS Parties expect that potential issues will include, *inter alia*, the manner in which FE is proposing to conduct default service. In particular, FE has proposed a number of modifications to their provision of default service and to the manner in which EGS's interact with FE and customers. These include the elimination of customer referral programs, and restrictions on renewal of customer contracts with EGSs that are contrary to prior Commission guidance, and which are not supported by law, and restrictions on POR participation that are discriminatory and likewise contrary to law. The EGS Parties reserve their right to address other issues as they deem appropriate.

## **IV. PROPOSED WITNESSES**

The EGS Parties are evaluating whether they will sponsor testimony in this proceeding. If the EGS Parties decide to sponsor testimony, it will inform the parties and the ALJs of any intended witnesses and topics of testimony. The EGS Parties also intend to participate in this proceeding 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**

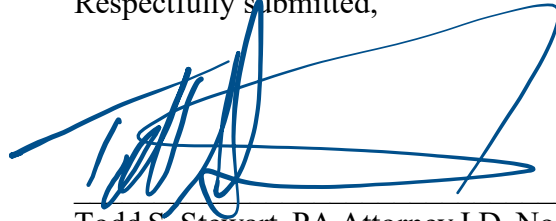
The EGS Parties will cooperate with the ALJs and the parties at the Prehearing Conference to develop an appropriate procedural schedule and discovery rules in accordance with the Commission's regulations and any directives issued by the ALJs.

**VI. POSSIBILITY OF SETTLEMENT**

The EGS Parties are willing to participate in settlement discussions should they occur in this proceeding. If settlement is unsuccessful, the EGS Parties takes no position at this time on whether a hearing is necessary or whether the matter should instead be decided on legal briefs.

**WHEREFORE**, the EGS Parties hereby request that their Prehearing Memorandum be entered into the record of this proceeding.

Respectfully submitted,



DATED: March 17, 2026

Todd S. Stewart, PA Attorney I.D. No. 75556  
HMS Legal LLP  
501 Corporate Circle, Suite 302  
Harrisburg, PA 17110  
Telephone: (717) 236-1300  
Facsimile: (717) 236-4841  
Email: [tsstewart@hmslegal.com](mailto:tsstewart@hmslegal.com)

*Counsel for Shipley Choice, LLC d/b/a  
Shipley Energy and Interstate Gas Supply,  
LLC d/b/a IGS Energy*