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December 4, 2017

VIA HAND DELIVERYRosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor
Harrisburg, PA 17120**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. _____

Dear Secretary Chiavetta:

Enclosed for filing is the Joint Petition of Metropolitan Edison Company, Pennsylvania Electric Company, Pennsylvania Power Company and West Penn Power Company (collectively, the "Companies") for Approval of Their Default Service Programs and accompanying Direct Testimony and Exhibits. In addition, enclosed please find a CD containing the filing in PDF format.

The Companies respectfully request that notice of this filing and a deadline for intervention be published in the December 16, 2017 issue of the *Pennsylvania Bulletin*.

Copies have been served on the parties in the manner indicated, as shown on the attached Certificate of Service.

Please feel free to contact me if you have any questions.

Sincerely,



Tori L. Giesler

Enclosures

c: As Per Certificate of Service

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**JOINT PETITION OF METROPOLITAN :
EDISON COMPANY, PENNSYLVANIA : DOCKET NOS.
ELECTRIC COMPANY, PENNSYLVANIA :
POWER COMPANY AND WEST PENN :
POWER COMPANY FOR APPROVAL OF :
THEIR DEFAULT SERVICE PROGRAMS :**

**JOINT PETITION OF METROPOLITAN EDISON
COMPANY, PENNSYLVANIA ELECTRIC COMPANY,
PENNSYLVANIA POWER COMPANY AND WEST
PENN POWER COMPANY**

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Company, Pennsylvania Electric Company,
Pennsylvania Power Company and West
Penn Power Company

Dated: December 4, 2017

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**JOINT PETITION OF METROPOLITAN :
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**JOINT PETITION OF METROPOLITAN EDISON
COMPANY, PENNSYLVANIA ELECTRIC COMPANY,
PENNSYLVANIA POWER COMPANY AND WEST
PENN POWER COMPANY**

Pursuant to Pennsylvania’s Electricity Generation Customer Choice and Competition Act, 66 Pa.C.S. § 2801, *et seq.* (the “Competition Act”), as amended by Act 129 of 2008 (“Act 129”),¹ the default service regulations of the Pennsylvania Public Utility Commission (“Commission”) at 52 Pa. Code §§ 54.181- 54.190 (“Regulations”), and the Commission’s Policy Statement on default service at 52 Pa. Code §§ 69.1801-1817 (“Policy Statement”), 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 petition the Commission for approval of their Default Service Programs (the “Program(s)”) as set forth herein. The Companies file this Joint Petition in accordance with their responsibilities as default service providers to establish the terms and conditions under which they will procure default service supplies, provide default service to non-shopping customers, satisfy requirements imposed by the Alternative Energy Portfolio Standards

¹ Act 129 amended several sections of the Public Utility Code. However, as used in this Joint Petition, “Act 129” will refer to the amendments made by Act 129 to 66 Pa.C.S. § 2807(e), unless specifically stated otherwise.

Act (“AEPS Act”)² and recover all associated costs on a full and current basis for the period from June 1, 2019 through May 31, 2023.

Consistent with the Competition Act, Regulations, Policy Statement and AEPS Act, the Companies’ Programs include a prudent mix of long-term, short-term and spot market generation supplies that are designed to produce the least cost to customers over time, and are structured to satisfy their obligation to furnish adequate and reliable service to default service customers. Accordingly, the Companies respectfully request that the Commission enter an order: (1) granting this Joint Petition; (2) approving the Companies’ proposed Programs, including each procurement plan, implementation plan, and contingency plan, as well as related bidder rules, supplier master agreement (“SMA”), credit documents, and other associated agreements for default service supply from June 1, 2019 through May 31, 2023; (3) approving the Companies’ proposed rate design and tariffs for default generation service, including recovery of all of the Companies’ costs associated with the provision of default service; (4) approving continuation of the Companies’ existing Customer Referral Programs (“CRP”) from June 1, 2019 through May 31, 2023, including the previously-approved cost recovery methodology³; (5) approving CRA International, Inc. d/b/a Charles River Associates (“CRA”) as the independent third-party evaluator for the Companies’ default supply procurements and The Brattle Group as the independent third-party evaluator for the Companies’ solar photovoltaic alternative energy credit (“SPAEC”) procurements; (6) finding that neither the Companies nor their affiliates have withheld from the market any generation supply in a manner that violates federal law; (7) finding that the Programs include prudent steps necessary to negotiate favorable generation supply contracts; (8) finding that the Programs include prudent

² 73 P.S. §§ 1648.1-1648.8 and related provisions of 66 Pa.C.S §§ 2813-2814.

³ See Docket Nos. P-2011-2273650 (Met-Ed), P-2011-2273668 (Penelec), P-2011-2273669 (Penn Power), and P-2011-2273670 (West Penn Power) (collectively, the “DSP II Proceeding”); Docket Nos. P-2013-2391368 (Met-Ed), P-2013-2391372 (Penelec), P-2013-2391375 (Penn Power), and P-2013-2391378 (West Penn) (collectively, the “DSP III Proceeding”); Docket Nos. P-2015-2511333 (Met-Ed), P-2015-2511351 (Penelec), P-2015-2511355 (Penn Power), and P-2015-2511356 (West Penn) (collectively, the “DSP IV Proceeding”).

steps necessary to obtain least-cost generation supply on a long-term, short-term and spot market basis; (9) granting a waiver of the rate design provisions of 52 Pa. Code § 54.187 and transmission-related price-to-compare provisions at 52 Pa. Code §§ 54.182 and 54.187, to the extent necessary; (10) approving the Companies' proposed SMA as an affiliated interest agreement under 66 Pa.C.S. § 2102; (11) approving Penelec's ability to transfer, at market, alternative energy credits ("AECs") acquired from non-utility generators ("NUGs") to the other Companies as proper affiliated transactions; (12) approving the Companies' proposed retail market enhancement rate mechanism; and (13) approving the continuation of the Companies' clawback charges related to their purchase of receivables ("POR") programs.

I. INTRODUCTION AND OVERVIEW

1. Met-Ed is a wholly owned subsidiary of FirstEnergy Corp. that provides service to approximately 560,000 electric utility customers in eastern Pennsylvania. Penelec is a wholly owned subsidiary of FirstEnergy Corp. that provides service to approximately 590,000 electric utility customers in central and western Pennsylvania. Penn Power is a wholly owned subsidiary of the Ohio Edison Company, which, in turn, is a wholly owned subsidiary of FirstEnergy Corp. Penn Power provides service to approximately 160,000 electric utility customers in western Pennsylvania. West Penn is a wholly owned subsidiary of FirstEnergy Corp. West Penn provides service to approximately 720,000 electric utility customers in western Pennsylvania.

2. Each Company is an electric distribution company ("EDC") as defined in the Competition Act and is the electric generation default service provider within its service territory for retail customers who do not choose an alternative electric generation supplier ("EGS") or whose EGS fails to provide service.

3. The Competition Act became effective on January 1, 1997, and, among other things, it restructured the electric utility industry in Pennsylvania by deregulating the generation of electricity, creating the framework for retail customers to choose alternative suppliers of generation, and establishing caps on unbundled rates that EDCs could charge during the transition to competition.

4. Section 2806(d) of the Competition Act, 66 Pa.C.S. § 2806(d), required EDCs to file restructuring plans for Commission approval that, in relevant part, “unbundled” (functionally disaggregated) their rates into distribution, transmission and generation components. Each of the Companies filed restructuring plans which, subject to certain modifications, were approved by the Commission.⁴

5. Following the transition to competition, the Companies retained the obligation to serve as the default service providers for their retail customers. The Companies’ current Commission-approved default service programs began on June 1, 2017.⁵

6. As part of the DSP IV Settlement, the Companies agreed to hold a stakeholder collaborative in October 2017 to discuss: (a) the currently-approved default service procurement plan and current market conditions; (b) the establishment of a bypassable retail market enhancement rate mechanism; (c) the scope of shopping available to customers enrolled in the Companies’ customer assistance programs (“CAPs”); (d) the continuation of the purchase of receivables (“POR”) clawback charge; and (e) any changes to customer classes.⁶ Further, the Companies were required to make a Commission filing, including but not limited to a new default

⁴ See Docket Nos. R-00974008 and R-00974009 (Met-Ed and Penelec) (Order entered October 20, 1998); Docket No. R-00974149 (Penn Power) (Orders entered July 22, 1998 and September 17, 1999); Docket No. R-00973981 (West Penn) (Order entered November 19, 1998).

⁵ *DSP IV Proceeding*, Docket Nos. P-2015-2511333, *et seq.* (Order entered May 19, 2016).

⁶ *DSP IV Proceeding*, Docket Nos. P-2015-2511333, *et seq.*, pp. 5-22 (Joint Petition for Settlement dated April 1, 2016).

service petition, with regard to certain of the collaborative topics in a docketed proceeding by January 31, 2018.⁷

7. Consistent with the foregoing settlement obligation, the Companies are filing the instant Joint Petition for approval of their Default Service Programs (“Joint Petition”). The term for the proposed Programs is June 1, 2019 through May 31, 2023.⁸ Of the DSP IV collaborative topics, the Companies are proposing the establishment of a bypassable retail market enhancement rate mechanism, the continuation of their POR clawback charges, and the adoption of formal tariff changes related to adjustments to be made to their customer class definitions in order to expand the provision of hourly-priced default service. At this time, the Companies are proposing no modifications to CAP shopping for their customers.

8. Section 54.185(a) of the Commission’s regulations provide that a default service provider should file a default service program with the Commission no later than twelve months before its current default service program will expire. In order to have sufficient time to undertake the competitive procurement process to obtain default generation supplies for service on and after June 1, 2019, the Companies must have final approved, unappealable default service programs in

⁷ *Id.*

⁸ Consistent with recent Commission precedent approving default service programs with four-year terms, the Companies are proposing a four-year term for their default service programs. *See, e.g., Petition of PECO Energy Company for Approval of its Default Service Program for the Period from June 1, 2017 Through May 31, 2021 (DSP IV)*, Docket No. P-2016-2534980 (Opinion and Order entered December 8, 2016); *Petition of PPL Electric Utilities Corporation for Approval of a Default Service Program and Procurement Plan for the Period June 1, 2017 Through May 31, 2021*, Docket No. P-2016-2526627 (Opinion and Order entered October 27, 2016); *Petition of Duquesne Light Company for Approval of a Default Service Plan for the Period June 1, 2016 to May 31, 2021*, Docket No. P-2016-2543140 (Order entered December 22, 2016). A four-year default service program term promotes more default service portfolio options, as well as conserves the resources associated with frequent default service filings. In light of this trend towards four-year default service programs, it is appropriate to no longer rely on prior Commission guidance in favor of two-year programs. *See, e.g., Investigation of Pennsylvania’s Retail Electricity Market: Recommendations Regarding Upcoming Default Service Plans*, Docket No. I-2011-2237952, p. 11 (Final Order entered December 16, 2011).

place by approximately September 1, 2018. Accordingly, the Companies are filing this Joint Petition to obtain approval by that date.⁹

9. This Joint Petition sets forth the Program for each of the Companies and, as such, identifies and describes the Companies' procurement plans, implementation plans, contingency plans, the design of rates to recover all reasonable costs on a full and current basis, and any changes proposed as a result of the DSP IV collaborative process.

10. This Joint Petition also incorporates the proposed standard default service SMA; auction rules; requests for proposal ("RFP") rules; associated form agreements; proposed tariff changes; along with the following direct testimony supporting various components of the Programs:

- **Met-Ed/Penelec/Penn Power/West Penn Statement No. 1, Direct Testimony of Kimberlie L. Bortz** (DSP IV Settlement Commitments, Customer Notice, Plan Term, Rate Design and Cost Recovery, Customer Referral Program, Purchase of Receivables Clawback Program, Bypassable Retail Market Enhancement Rate, Related Tariff Matters).
- **Met-Ed/Penelec/Penn Power/West Penn Statement No. 2, Direct Testimony of James H. Catanach** (Product Definitions, Procurement Process and Schedule, Default Service Supplier Master Agreement, Alternative Energy Portfolio Standards Act Requirements, Contingency Plans).
- **Met-Ed/Penelec/Penn Power/West Penn Statement No. 3, Direct Testimony of James D. Reitzes** (Analysis of Default Service Supply Plans).

⁹ See 66 Pa.C.S. § 2807(e)(3.6) (providing that the Commission shall issue a final order approving or disapproving a proposed default service program within nine months of filing).

11. As explained in the Joint Petition and supporting testimony, the Companies are proposing limited changes to their existing, Commission-approved default service programs.

II. DEFAULT SERVICE PROCUREMENT PLAN

A. Default Service Products

12. The Companies seek to procure full-requirements, load-following energy and energy-related products for all default service customers through a competitive procurement process. For procurement purposes, non-shopping load will be segregated into residential, commercial and industrial customer classes. Each customer class will have its own product specifications, as described below. The load of each class will be divided into tranches, with each tranche constituting a fixed percentage of each of the Company's non-shopping load. As discussed further below, the Companies are proposing to move those non-shopping customers served on Rates GS-Medium (for Met-Ed and Penelec), Rate GM (for Penn Power) and Schedule 30 (for West Penn) with a demand of 100 kW or higher from the commercial class default service pricing model under the Companies' Price to Compare Default Service ("PTC") Riders to hourly priced default service as part of the industrial class under the Companies' Hourly Pricing Default Service ("HP") Riders, consistent with their commitment in the DSP IV Settlement and the Commission's recommendation in its End State Order as part of its Investigation of Pennsylvania's Retail Electric Market.¹⁰

13. Winning bidders in the competitive procurement process must fulfill all obligations imposed on a load serving entity ("LSE") by PJM Interconnection, LLC ("PJM") and, as LSEs, will be required to: (i) provide energy, capacity and transmission service (including Network

¹⁰ *Investigation of Pennsylvania's Retail Electricity Market: End State of Default Service*, Docket No. I-2011-2237952, p. 29 (Final Order dated February 14, 2013).

Integration Transmission Service (“NITS”), subject to specific exclusions)¹¹; (ii) pay all ancillary service costs and PJM administrative expenses; and (iii) provide any other services and pay any other fees as required by PJM of an LSE. Default service suppliers in the Met-Ed, Penelec and Penn Power service territories will also be responsible for meeting 100% of the non-solar Tier I and Tier II AEPS Act requirements. Met-Ed, Penelec and Penn Power will procure all necessary solar photovoltaic requirements on behalf of default service suppliers and EGSs that serve load in their respective service areas. In the West Penn service territory, default service suppliers will be responsible for all Tier I and Tier II AEPS Act requirements (including solar photovoltaic requirements) less any Tier I AECs or SPAECs that are allocated to the suppliers from existing long-term purchases made by West Penn. Each of these winning bidder obligations is consistent with existing supplier obligations under the Companies’ current default service programs.

14. Additionally, each winning supplier will be required to schedule delivery to the PJM load zone that corresponds to the Company with which it has contracted for the sale of power, as follows: “METED_RESID_AGG” for Met-Ed products, “PENELEC_RESID_AGG” for Penelec products, “Penn Power_RESID_AGG” for Penn Power products, and “APS_RESID_AGG” for West Penn products. All load zones are located within the control area for which PJM is the regional transmission organization (“RTO”). Winning suppliers must be

¹¹ As explained in Section III.C., *infra*, the Companies will continue to assume responsibility for Regional Transmission Expansion Plan charges (“RTEP”), Expansion Cost Recovery Charges (“ECRC”), Reliability Must Run/generation deactivation charges (“RMR”) associated with generating plants for which specific RMR charges begin after July 24, 2014, historical out of market tie line, generation and retail customer meter adjustments; unaccounted for energy (“UFE”); or any Federal Energy Regulatory Commission (“FERC”)-approved reallocation of PJM Regional Transmission Expansion Plan charges related to Docket No. EL05-121-009 (collectively referred to as “non-market based charges,” or “NMB charges”). These NMB charges will be assumed by the Companies for both default service suppliers and EGSs that serve load in the Companies’ service areas, the costs for which will be recovered from customers in a competitively-neutral manner under the Companies’ non-bypassable Default Service Support (“DSS”) Riders.

members of PJM and must comply with all regulations, business rules, scheduling protocols and all other aspects of doing business within PJM.

Residential Class

15. Each residential class tranche includes a 95% fixed-priced product, the price for which will be established through the Companies' descending-price clock auction process. A tranche is a fixed percentage of each Company's default service load corresponding to approximately 50 megawatts ("MW"), although the actual load served will vary based on many factors, including customer migration to EGSs. Residential products will have staggered 12 and 24-month terms. The remaining 5% of the residential product is a real-time hourly load locational marginal price ("LMP") for the Delivery Point plus a fixed adder of \$20.00 per megawatt hour ("MWh") to cover the costs of other supply components associated with serving the contracted load, including capacity, ancillary services, AEPs compliance, and other costs.

Commercial Class

16. Each commercial class tranche features a 100% fixed-priced product, served in approximately 50 MW tranches to be bid out through the Companies' descending-price clock auction process. Commercial products will have staggered 3-month, 12-month and 24-month terms. Commercial customers with demand less than 100 kilowatts ("kW") are eligible for this product.

Industrial Class

17. The industrial class product is an hourly-priced service ("HPS") based upon the PJM real-time zonal hourly market price. Suppliers will bid for the right to serve a portion of the HPS load for 12-month terms (commencing on June 1 in 2019, 2020, 2021, and 2022). Each tranche will be approximately 100 MW, although the actual load served will vary based on many

factors, including customer migration to EGSs. Winning suppliers will be paid the winning price bid in the hourly-priced auction, the hourly PJM real-time zonal LMP, and an additional fixed adder of \$4/MWh to capture the estimated costs of other supply components, including capacity, ancillary services, NITS, AEPS compliance, and other costs.

18. As part of the DSP IV Settlement, the Companies agreed to lower the hourly default service pricing threshold from 400 kW to 100 kW beginning June 1, 2019, when the Companies expect to have billing-capable smart meters installed in their service territories. The Companies are developing an outreach and educational communication plan to inform shopping and default service customers with demand between 100 kW and 400 kW of their movement from the PTC Rider, which includes a fixed-price product, to the HP Rider, which includes an hourly spot product.

B. Procurement Schedule and Method

19. The Companies propose a procurement plan for all customer classes using eighteen separate procurement dates occurring in October/November¹² 2018, 2019, 2020, 2021, and 2022; January 2019, 2020, 2021, 2022, and 2023; April 2019, 2020, 2021, and 2022; and June 2019, 2020, 2021, and 2022.

20. The Companies propose to procure the previously-described full-requirements default service products through simultaneous, multiple-round, descending-price clock auctions similar to those used, and being used, by the Companies under their current default service programs. The proposed auction process allows suppliers to efficiently switch between the different products being procured by Met-Ed, Penelec, Penn Power and West Penn. Potential

¹² The Companies will conduct each fall auction at some point after October 20 and before November 20 to allow participants in the fall auction to have access to any applicable proposed formula NITS rates filed in October for the upcoming calendar year before the auction occurs.

suppliers will have to meet certain credit and financial criteria in order to participate in the auction. Winning bids will be chosen from pre-qualified participants solely on the basis of price (i.e., the low-price bidders will be the procurement winners, subject to load cap restrictions). Bidding proceeds in rounds. In a round, the procurement manager announces a price for each product. Participants in the procurement then make bids for the number of tranches that they are willing to supply for each of the specified products at the announced prices. If the number of tranches supplied by all suppliers is greater than the number of tranches needed for a product at a particular price, the price for that product is reduced in the next round. In that round, suppliers are given an opportunity to bid again and are permitted to switch their bids from one product to another, if applicable.

21. The format described above is characterized as a “descending clock” auction because prices “tick down” as rounds progress, starting at an initial price and being reduced until the number of tranches that all bidders are willing to supply is just enough to match the load to be supplied.

22. The “descending clock” procurement process has many benefits. Its multi-product design allows all products to be procured in a single auction, which provides a cost-effective, economically efficient means to obtain multiple products while also allowing for instantaneous market-based pricing. Suppliers receive feedback from the results of each round. Because pricing is transparent, some suppliers will withdraw, and the least-cost suppliers will prevail. The Companies have successfully employed the descending clock auction to obtain default supplies under their current default service programs, and the Commission is familiar with the process and the results it obtains.

23. The Companies propose to maintain their current load cap, which restricts the amount of supply any one bidder can win in an auction, of 75%.

C. Supplier Master Agreement

24. In this proceeding, the Companies are proposing to continue the use of their current Commission-approved SMA for their default service programs, with only limited modifications.

25. As described in the testimony of Mr. Catanach, the proposed SMA differs from the Companies' current Commission-approved SMA in only two limited ways: (1) modifications were made to reflect the expansion of the industrial class to include customers with demand of 100 kW and above consistent with the proposed class revisions discussed in paragraph 12, *infra*; and (2) cleanup modifications were made regarding assignment of new PJM billing line items that have been established since the Companies' DSP IV proceeding.

D. AEPS Act Requirements

Non-Solar Photovoltaic Requirements

26. In accordance with Section 54.185(e)(1) of the Regulations, the Companies propose to satisfy most of their AEPS Act requirements as part of the solicitation of a default service supply. Specifically, winning suppliers of full-requirements default service products in the Met-Ed, Penelec and Penn Power service territories will be responsible for meeting all non-solar Tier I and Tier II requirements. Winning suppliers in West Penn's service territory will be responsible for those same requirements less any Tier I AECs that are allocated to the suppliers on a load ratio basis from existing long-term purchases made by West Penn.

27. Penelec will have the added flexibility to make market-priced sales of excess AECs acquired under existing Commission-approved NUG contracts for use in meeting the Companies' AEPs requirements.

Solar Photovoltaic Requirements

28. Met-Ed, Penelec and Penn Power will conduct two RFPs to solicit bids for the provision of a fixed number of SPAECs based on each Company's most recent distribution load forecasts. The amount selected for procurement is expected to meet approximately 100% of the solar photovoltaic AEPS requirements of all EGSs and default service suppliers, after taking into account previous SPAEC purchases.

29. The proposed RFP process is consistent with the procurement process being used by Met-Ed, Penelec and Penn Power under their current Commission-approved default service plans. Prospective bidders will be invited to participate in a two-part RFP process. First, they become "qualified" bidders after submitting contact and credit information, making specified representations, and agreeing to specified conditions. Qualified bidders will be able to make binding offers in the second part of the process, which also requires that they post appropriate financial guarantees and agree to additional conditions designed to foster the competitiveness of the procurement process.

30. In the West Penn service territory, default service suppliers will be responsible for all solar photovoltaic requirements less any SPAECs that are allocated to the suppliers on a load ratio basis from existing long-term purchases made by West Penn.

E. Independent Evaluators

31. Consistent with the Regulations' requirements and the Policy Statement's recommendation, the Companies have retained CRA to be the independent third-party evaluator for their default service procurements. CRA has extensive expertise in the operation of competitive wholesale energy markets and is serving as the independent third-party evaluator for the Companies' current Commission-approved default service programs.

32. The Companies have selected The Brattle Group to serve as the independent third-party evaluator for the procurement of SPAECs. The Brattle Group has considerable expertise in competitive energy matters and has been involved in several RFP design and management processes, including the procurement of electric power and renewable energy supplies under long-term contracts. The Brattle Group has served as the independent evaluator in past SPAEC procurements held by the Companies.

33. The auction and RFP rules that guide the bid solicitation process are designed to comply with the Commission's codes of conduct and to ensure that bidder qualification requirements are fair and nondiscriminatory.¹³

F. Requirements Of PJM

34. As required by Section 54.185(e)(4) of the Regulations, the Companies' Programs are consistent with the legal and technical requirements of PJM pertaining to the generation, sale and transmission of electricity. The Companies' proposed SMA requires suppliers to maintain specific qualifications under applicable PJM agreements and rules. Before suppliers may participate in the bid process, they will have to demonstrate that they can fulfill the technical and regulatory requirements of the SMA, including becoming an LSE, as defined under PJM's rules.

G. Contingency Plan

35. The Companies propose to continue utilizing the contingency plans in their current Commission-approved default service plans, which address the following three possible scenarios: (i) an individual solicitation is not fully subscribed; (ii) the Commission rejects the bid results from a solicitation; or (iii) a winning supplier defaults prior to the start of the delivery period or at any time during the delivery period.

¹³ See 52 Pa. Code § 54.186(b)(6)(ii) and (c)(2).

36. For full-requirements, load-following products, if a scheduled solicitation is not fully subscribed following the initial proposed procurement or if the Commission rejects the bid results from a solicitation, the Companies will rebid the unfilled tranches from that solicitation in the next scheduled procurement for which there is sufficient calendar time to include the tranches. For any unfilled tranches still remaining, the Companies will purchase the necessary physical supply through PJM-administered markets. The Companies will not enter into hedging transactions to attempt to mitigate the associated price or volume risks to serve such unfilled tranches. The Companies propose to secure any AEPS Act compliance requirements for unfilled tranches at market prices.

37. If a winning bidder defaults prior to the start of, or during, the delivery period, the Companies will offer the unfilled tranches to the other qualified bidders who participated in the most recent solicitation of full-requirements, load-following products. The Companies may enter into an agreement with the qualified bidder(s) offering the best terms for the unfilled tranches resulting from the default, provided the prices offered by such bidder(s) are consistent with the original prices at which the unfilled tranches were procured, giving due consideration to changes in market conditions from the time when the original tranches were procured. If the Companies are not able to enter into such agreement and at least thirty calendar days remain prior to the start of the delivery period, the Companies will seek to bid the defaulted tranches in a separate supplemental competitive solicitation. If insufficient time exists to conduct an additional competitive solicitation, or if the supplemental solicitation is unsuccessful, the Companies will supply the tranches by purchasing power in the PJM-administered markets in the same manner described in the preceding paragraph.

38. If a SPAEC solicitation held by Met-Ed, Penelec, or Penn Power is not fully subscribed, the Commission rejects the bid results from a solicitation, or a winning supplier

defaults before or during the delivery period, the Companies will conduct short-term procurements at market prices to ensure compliance with solar photovoltaic AEPS requirements until such time as the Commission approves an alternative mechanism.

III. RATE DESIGN AND COST RECOVERY

A. Price To Compare Default Service Rate Rider

39. The Companies currently recover the cost of default service for the residential and commercial customer classes through their PTC Riders. Modifications are proposed to the PTC Riders to accommodate those commercial and industrial class modifications discussed in paragraph 12, *infra*.

40. The Companies also propose to modify their PTC Riders to include a non-bypassable retail market enhancement rate mechanism (“PTC Adder”). The purpose of the PTC Adder is to incentivize shopping among residential customers, only approximately 30% of whom are currently shopping for electricity. The PTC Adder will not apply to commercial or industrial customers, which generally shop in larger numbers and are more aware of their generation purchasing options, and therefore, do not require additional incentive to shop for electricity.

41. The PTC Riders will continue to adjust rates quarterly, with rate change filings to be made the latter of forty-five days prior to the effective date or seven days after the last supply auction.

B. Hourly Pricing Default Service Rider

42. The Companies currently recover the cost of default service for larger commercial and industrial customers through their HP Riders. The HP Riders will apply to commercial and industrial customers with demand 100 kW and above.

43. The HP Riders will continue to adjust rates quarterly, with rate change filings to be made the latter of forty-five days prior to the effective date or seven days after the last supply auction.

C. Default Service Support Rider

44. The Companies are proposing to modify their DSS Riders to allow for the refunding of 95% of the revenue collected through the PTC Adder to all residential customers,¹⁴ as well as to expand the definition of NMB charges as explained in paragraph 45.

45. The Companies will continue to assume responsibility for NMB Charges for both default service suppliers and EGSs that serve load in the Companies' service areas and recover the costs from customers under the DSS Riders. The Companies are proposing to expand the NMB Charges component to include any Federal Energy Regulatory Commission-approved reallocation of PJM Regional Transmission Expansion Plan charges related to Docket No. EL05-121-009.

46. Consistent with the Companies' existing tariffs, the Companies are proposing to continue a flat per-kWh rate design for the residential and commercial customer classes and a demand-based rate design for the industrial customer class. The demand for the industrial customer class will continue to be the single coincident peak kW Network Service Peak Load, as calculated by the Companies in accordance with PJM rules and requirements.

47. The Companies respectfully request a waiver, if necessary, of the Regulations (specifically with regard to the inclusion of transmission costs in the price to compare addressed at 52 Pa. Code §§ 54.182 and 54.187) so that they may recover the NMB Charges through the non-bypassable DSS Riders rather than the price-to-compare.

¹⁴ The Companies propose to retain 5% of the revenue collected through the PTC Adder to recover expenses associated with administering the PTC Adder.

D. Solar Photovoltaic Requirements Charge Rider

48. Met-Ed, Penelec, and Penn Power currently have a Solar Photovoltaic Requirements Charge Rider (“SPVRC Rider”) that applies to all delivery service customers and are not proposing any changes to the SPVRC Rider in this proceeding.

E. Time-Of-Use Rates

49. The Companies currently offer optional Time-of-Use (“TOU”) pricing rates through their Rider K, Residential TOU Default Service Riders, which have no expiration date. The Companies propose to continue these Riders without modification under their Programs.

F. Reconciliation

50. As described in the testimony of Ms. Bortz, the PTC Riders, HP Riders, and SPVRC Riders currently include “E” factor reconciliation mechanisms. The Companies are not proposing any changes to those reconciliation mechanisms.

IV. CUSTOMER REFERRAL PROGRAM

51. Each Company currently has a CRP for residential and small commercial customers and proposes to continue offering the CRP from June 1, 2019 to May 31, 2023.

52. Consistent with the current CRP and the Companies’ existing tariffs, the Companies propose to continue to recover CRP costs through an EGS participant fee not to exceed \$30 per enrolled customer with any remaining program costs recovered, on a non-bypassable basis, through the Companies’ applicable DSS Riders.

V. PURCHASE OF RECEIVABLES

53. Consistent with the Commission’s Policy Statement at 52 Pa. Code § 69.1814, each of the Companies agreed to provide, and the Commission approved, POR programs for residential

and small commercial accounts served by EGSs.¹⁵ Under each of the Companies' existing POR programs, accounts receivable are purchased from participating EGSs at a zero discount rate (meaning the Companies pay the face value of the account receivable regardless of what they are actually able to collect from customers), which eliminates the risk to EGSs of uncollectible accounts expense associated with serving residential and small commercial customers.

A. Purchase of Receivables Clawback Charge

54. As part of the DSP IV Settlement, the Commission approved a pilot POR clawback charge for each of the Companies, which was designed to collect a portion of uncollectible accounts expense from EGSs; specifically, those EGSs whose pricing practices are driving significantly higher write-offs than their peers. During DSP IV, an annual clawback charge was assessed to certain EGSs who met the following criteria. First, the EGS's average percentage of write-offs as a percentage of revenue exceeded 200% of the average percentage of total supplier write-offs as a percentage of revenue as calculated separately for Met-Ed, Penelec, Penn Power and West Penn for the twelve-month period ending August 31. Second, of those EGSs identified based on the first criterion, the clawback charge was applied to EGSs whose average price charged over the same twelve-month period exceeded 150% of the average PTC for the operating company for that period. The clawback charge represents the difference between the EGS's actual write-offs and their write-off amount calculated at 200% of the average EGS percentage of write-offs per operating company.

¹⁵ See, *Joint Petition of Metropolitan Edison Company and Pennsylvania Electric Company for Approval of Their Default Service Programs*, Docket Nos. P-2009-2093053 and P-2009-2093054 (Opinion and Order approving settlement entered November 6, 2009) (Met-Ed and Penelec); *Petition of Pennsylvania Power Company for Approval of its Default Service Programs*, Docket No. P-2010-2157862 (Opinion and Order approving settlement entered November 17, 2010) (Penn Power); DSP III Proceeding (Opinion and Order approving settlement entered July 24, 2014) (revising West Penn).

55. The clawback charge was successful in decreasing the amount of write-offs from the first year to the second year of DSP IV. In an effort to further discourage pricing practices that create disproportionately higher write-offs to the detriment of the Companies and their customers, the Companies propose to continue the clawback charge as a permanent part of its POR program.

VI. AFFILIATE RELATIONS

56. Pursuant to 66 Pa.C.S. § 2807(e)(3.1)(III)(B), which states that any agreement between affiliated parties shall be subject to Commission review and approval under Chapter 21 of the Public Utility Code, the Companies request that the Commission approve the *pro forma* SMA as an affiliated interest agreement pursuant to 66 Pa.C.S. § 2102. The Regulations and Policy Statement permit affiliates of default service providers to participate in competitive procurements for default service supplies. Consequently, it is possible that the Companies' affiliate, FirstEnergy Solutions Corp. ("FES"), may participate in one or more of the Companies' proposed procurements. In the event FES is a winning bidder, it will need to execute the SMA in the same timeframe as any other supplier. As a result, advance approval of the *pro forma* SMA, which accompanies this Joint Petition and the Companies' direct testimony, as an affiliated interest agreement is necessary. The Commission granted similar approvals of the Companies' existing SMAs as part of the approval of their existing default service programs.

57. Section 2807(e)(3.7)(III) of the Public Utility Code requires the Commission, when approving default service programs, to find that "[n]either the default service provider nor its affiliated interest has withheld from the market any generation supply in a manner that violates Federal law." The Companies do not own generation and, pursuant to the Commission's Competitive Safeguards¹⁶ and the FERC's Standards of Conduct,¹⁷ the Companies' supplier

¹⁶ 52 Pa. Code §§ 54.121, *et seq.*

¹⁷ 18 C.F.R. §§ 358.1, *et seq.*

affiliate, FES, does not discuss generation or market-related issues with Met-Ed, Penelec, Penn Power or West Penn. Moreover, the Companies are not aware of any determination by any court or regulatory agency of competent jurisdiction that FES has withheld generation supply from the wholesale market in violation of federal law.

58. Pursuant to 66 Pa.C.S. § 2102(a), no agreement between a utility and an affiliated interest is valid without prior approval by the Commission. Through this Petition, Penelec is requesting to transfer AECs acquired through its NUG agreements in order to meet all of the Companies' AEPS requirements. The Companies request the Commission's approval of Penelec's transfer of AECs to the other Companies as proper affiliated transactions pursuant to Chapter 21 of the Public Utility Code.

VII. NOTICE

59. In accordance with Sections 54.185 and 54.188 of the Regulations, the Companies will provide notice of this filing in several ways:

- Within thirty days of filing this Joint Petition, each of the Companies will provide public notice of the filing by publishing a notice in the major newspapers serving their respective service areas. The notice will contain information about the Companies' tariff filings, their proposed competitive solicitations of generation resources, how the Companies' Programs may affect customers, where the filings are available for public inspection, how comments or complaints can be filed, and how customers can participate in this proceeding.
- The Companies' Joint Petition and their direct testimony and accompanying exhibits will be made available for inspection at Met-Ed's principal office in Reading, Penelec's principal office in Erie, Penn Power's office in Clark, and West

Penn's principal office in Greensburg. This material will also be posted to the Companies' public internet domain, where it will be available electronically for public inspection.

- The Companies will provide additional public notice by means of a press release to inform customers of the filing.
- The Companies have also served copies of this Joint Petition and direct testimony and accompanying exhibits on the Office of Consumer Advocate, Office of Small Business Advocate, the Commission's Bureau of Investigation and Enforcement, PJM, Met-Ed Industrial Users Group, Penelec Industrial Customer Alliance, Penn Power Users Group, West Penn Power Industrial Intervenors, the Retail Electric Supplier Association, the Pennsylvania State University, the Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania, and all EGSs registered to provide service in their respective service territories.
- The Companies will provide additional notice as directed by the Commission.

60. The Companies believe these communication efforts will provide potential interested parties with ample notice as well as an opportunity to participate in the Commission's proceeding addressing the Companies' Programs.

VIII. PROPOSED SCHEDULE

61. Pursuant to § 2807(e)(3.6) of the Public Utility Code, the Commission will have nine months from the date of this filing to issue a final order. In accordance with that timeline, the Companies suggest the following schedule for this proceeding:

Joint Petition Filing	December 11, 2017
Publication in the Pennsylvania Bulletin	December 23, 2017

Pre-Hearing Conference	January 4, 2018
Other Parties' Direct Testimony	February 2, 2018
Rebuttal Testimony	March 1, 2018
Surrebuttal Testimony	March 15, 2018
Oral Rejoinder and Hearings	March 27-28, 2018
Main Briefs	April 20, 2018
Reply Briefs	May 1, 2018
Recommended Decision	June 1, 2018
Exceptions	June 21, 2018
Reply Exceptions	July 2, 2018
Commission Order	September 11, 2018

IX. REQUEST FOR WAIVERS

62. To the extent necessary, the Companies request: (1) a waiver of 52 Pa. Code § 54.187(h)-(j) in order to use their proposed residential, commercial and industrial customer class definitions, which the Commission has previously approved; and (2) a waiver of the Commission's requirements at 52 Pa. Code §§ 54.182 and 54.187 with regard to including certain transmission-related costs in the price-to-compare so that they may recover the NMB Charges through the non-bypassable DSS Riders rather than the price-to-compare as previously explained.

X. PUBLIC INTEREST CONSIDERATIONS

63. The Companies' proposed Programs are in the public interest for all of the reasons previously explained and for the following reasons: (1) the Programs will utilize a competitive and transparent bid solicitation process; (2) the Programs will utilize fair and nondiscriminatory bidder qualification requirements; (3) an independent third party evaluator will be utilized for all procurements; (4) the Programs are consistent with the legal and technical requirements established by PJM and align with its planning year; (5) the Programs provide for compliance with AEPS requirements; (6) the Programs have protocols to ensure that the Companies' supplier

affiliates do not receive an advantage in the solicitation and evaluation of competitive bids; (7) the Programs provide for hourly or quarterly adjustments of the default service rate components, as applicable; (8) the Programs include viable contingency plans; (9) the Programs ensure that the price-to-compare is designed to recover all default service costs; (10) the Programs have a procurement schedule that diversifies the times when procurements occur; (11) the Programs utilize a prudent mix of long-term, short-term and spot market generation supply to yield the least cost to customers over time; and (12) the Companies are providing ample notice of their proposed Programs to interested parties.

XI. CONCLUSION

Pursuant to the requirements of 66 Pa.C.S. § 2807(e)(3.7), the Companies request that the Commission enter an order: (1) granting this Joint Petition; (2) approving the Companies' proposed Programs, including each procurement plan, implementation plan, and contingency plan, as well as related bidder rules, SMA, credit documents, and other associated agreements for default service supply from June 1, 2019 through May 31, 2023; (3) approving the Companies' proposed rate design and tariffs for default generation service, including recovery of all of the Companies' costs associated with the provision of default service; (4) approving continuation of the Companies' existing Customer Referral Programs and associated cost recovery; (5) approving CRA as the independent third-party evaluator for the Companies' default supply procurements and The Brattle Group as the independent third-party evaluator for the Companies' solar photovoltaic alternative energy credit procurements; (6) finding that neither the Companies nor their affiliates have withheld from the market any generation supply in a manner that violates federal law; (7) finding that the Programs include prudent steps necessary to negotiate favorable generation supply contracts; (8) finding that the Programs include prudent steps necessary to obtain least-cost generation supply on a long-term, short-term and spot market basis; (9) granting a waiver of the

rate design provisions of 52 Pa. Code § 54.187 and transmission-related price-to-compare provisions at 52 Pa. Code §§ 54.182 and 54.187, to the extent necessary; (10) approving the Companies' proposed SMAs as affiliated interest agreements under 66 Pa.C.S. § 2102; approving Penelec's ability to transfer, at market value, alternative energy credits, acquired from NUGs amongst the Companies as proper affiliated transactions; (12) approving the Companies' proposed retail market enhancement rate mechanism; and (13) approving the continuation of the Companies' clawback charges within their supplier tariffs.

Respectfully submitted,



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Company*

Dated: December 4, 2017

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**JOINT PETITION OF METROPOLITAN :
EDISON COMPANY, PENNSYLVANIA : DOCKET NOS.
ELECTRIC COMPANY, PENNSYLVANIA :
POWER COMPANY AND WEST PENN :
POWER COMPANY FOR APPROVAL OF :
THEIR DEFAULT SERVICE PROGRAMS :**

CERTIFICATE OF SERVICE

I hereby certify and affirm that I have this day served a copy of the Joint Petition of Metropolitan Edison Company, Pennsylvania Electric Company, Pennsylvania Power Company and West Penn Power Company for Approval of Their Default Service Programs on the following persons in the matter specified in accordance with the requirements of 52 Pa. Code § 1.54:

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White Plains, NY 10601

Greencrown Energy, LLC
229 Main Street
Belleville, NJ 07109

Grid Energy, LLC d/b/a Distributed Grid
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Philadelphia, PA 19123

Global Vision Energy, LLC
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Good Energy, L.P.
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Green Mountain Energy Company
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Groundswell of PA
1156 15th Street, NW, Suite 840
Washington, DC 20005

H.P. Technologies, Inc.
33648 St. Francis Drive
Avon, OH 44011

HB Hayes & Assoc. LLC d/b/a
Alternative Energy Source
8225 Farnsworth Road, Suite B
Waterville, OH 43566

HIKO Energy, LLC
12 College Road
Monsey, NY 10952

Hudson Energy Services, LLC
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Mississauga, ON L5T 2E6

IDT Energy, Inc.
550 Broad Street
Newark, NJ 07102

Independence Energy Group, LLC
d/b/a Cirro Energy
3711 Market Street, Suite 1000
Philadelphia, PA 19104

Insight Energy, LLC
11207 Rosewood
Leawood, KS 66211

Inspire Energy Holdings, LLC
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Philadelphia, PA 19120

Intelligen Resources, LP
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Aledo, TX 76008

Ioway Energy, LLC
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Overland Park, KS 66210

J.J. Jasmahn, Ltd d/b/a Jasmahn Energy
7107 Azalea
Dallas, TX 75230

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Auburn, MA 01501

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d/b/a HRNEnergy
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Florham Park, NJ 07932

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Chicago, IL 60618

I.C. Thomasson Associates, Inc.
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Nashville, TN 37204

Incite Energy, LLC
20 East Greenway Plaza, Suite 400
Houston, TX 77046

Infinity Power Partners, LLC
2603 Augusta Drive, Suite 450
Houston, TX 77057

Interstate Gas Supply
d/b/a IGS Energy
1379 Butter Churn Drive
Herndon, VA 20170

Integrity Comm. of OH, LLC
d/b/a Integrity Energy
3711 Grant Avenue
Cleveland, OH 44105

Josco Energy USA, LLC
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Mahwah, NJ 07430

Just Energy Pennsylvania Corporation
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Blue Bell, PA 19422

Kinetic Energy Associates, LLC
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Harrisburg, PA 17101

Keytex Energy Solutions, LLC
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Irving, TX 75062

Liberty Power Delaware, LLC
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Ft. Lauderdale, FL 33309

Lincoln Energy Group, LLC
414 North Orleans Street
Chicago, IL 60654-4498

LifeEnergy, LLC
2000 West Loop South, Suite 2010
Houston, TX 77027

Lower Electric, LLC
1307 Shermer Road
Northbrook, IL 60062

MAA Inc. d/b/a Industrial Energy
125 Strafford Avenue
Suite One
Wayne, PA 19087

Mansfield Power & Gas, LLC
1025 Airport Parkway, SW |
Gainesville, GA 30501

Make The Switch USA, LLC
1209 Via Visalia
San Clemente, CA 92672

Marketing Systems Group, LLC
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2033 Milwaukee Avenue, Suite 350
Riverwoods, IL 60015

MC Squared Energy Services, LLC
175 W. Jackson Blvd, Suite 240
Chicago, IL 60604

KWH Savings, LLC
5693 W. Howard Street
Niles, IL 60714

Lakepoint Energy, LLC
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White Plains, NY 10601

Liberty Power Holdings
1901 West Cypress Creek Road, Suite 600
Fort Lauderdale, FL 33309

Linde Energy Services, Inc.
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Stewartsville, NJ 08886

Mid Atlantic Energy Services, LLC
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Carbondale, PA 18407

Live Energy, Inc.
1124 Glade Road, Suite 140
Collegeville, TX 76034

Lower Watt, LLC
12 North Crest Place
Lakewood, NJ 08701

M&L Service Providers LLC
134 Leonard Street
Lakewood, NJ 08701

Manhattan Energy, LLC
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Valhalla, NY 10595

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Navigate Power LLC
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National Choice Energy, LLC
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National Utilities Refund, LLC
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6216 Vista Terrace
Orefield, PA 18069

New America Power LLC
41 University Drive, Suite 400
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Mint Energy, LLC
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Mobilenet Inc. d/b/a Smith Energy Group
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Pittsburgh, PA 15276

National1 Energy, LLC
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12140 Wickchester Lane, Suite 100
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Nationwide New Energy Mngmnt Group, LLC
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