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January 15, 2018

*Via Electronic Filing*

Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street, 2<sup>nd</sup> Floor (filing room)  
PO Box 3265  
Harrisburg, PA 17105-3265

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-2017-2637855, P-2017-2637857, P-2017-2637858 and P-2017-2637866; **PREHEARING CONFERENCE MEMORANDUM**

Dear Secretary Chiavetta:

Enclosed you will find The Pennsylvania State University's Prehearing Conference Memorandum in the above-captioned matters. Copies have been served in accordance with the attached Certificate of Service.

Should you have any questions or comments, please feel free to contact me directly.

Very truly yours,

Thomas J. Sniscak  
William E. Lehman

*Counsel for The Pennsylvania State University*

TJS/WEL/das

Enclosures

cc: Honorable Mary D. Long, Administrative Law Judge  
Per the Certificate of Service

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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-2017-2637855
	:		P-2017-2637857
	:		P-2017-2637858
	:		P-2017-2637866
	:		

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**PREHEARING CONFERENCE MEMORANDUM OF  
THE PENNSYLVANIA STATE UNIVERSITY**

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**TO: THE HONORABLE MARY D. LONG**

On December 4, 2017, Metropolitan Edison Company (“Met-Ed”), Pennsylvania Electric Company (“Penelec”), Pennsylvania Power Company (“Penn Power”) and West Penn Power Company (“West Penn”) (collectively the “FirstEnergy Companies”) filed a Joint Petition for Approval of their Default Service Programs (the “Joint Petition”) pursuant to Pennsylvania’s Electricity Generation Customer Choice and Competition Act, 66 Pa.C.S. § 2801, et seq., as amended by Act 129 of 2008, the default service regulations of the Pennsylvania Public Utility Commission (“Commission”) at 52 Pa. Code §§ 54.181-54.190, and the Commission’s Policy Statement on default service at 52 Pa. Code §§ 69.1801-1817. The Joint Petition relates to default service rates to be charged by the FirstEnergy Companies during the period from June 1, 2019 through May 31, 2023.

On December 21, 2017, a Notice was issued by the Commission setting a Prehearing Conference in the above-captioned proceeding for Wednesday, January 17, 2018, before the Honorable Mary D. Long. On December 21, 2017, ALJ Long issued a Prehearing Conference Order directing the parties to submit Prehearing Conference Memoranda by 3:00 PM on Tuesday, January 16, 2018.

The Pennsylvania State University (“PSU”), by and through its attorneys in this matter, Hawke, McKeon & Sniscak LLP, hereby submits its Prehearing Conference Memorandum.

**I. ACCEPTANCE OF SERVICE**

Service of paper documents in this proceeding shall be accepted on behalf of PSU by:

Thomas J. Sniscak, Esq.  
Hawke McKeon & Sniscak LLP  
100 North Tenth Street  
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Counsel for PSU also requests that any electronic service list utilized by the parties in this proceeding include Thomas J. Sniscak ([tjsniscak@hmslegal.com](mailto:tjsniscak@hmslegal.com)) and William E. Lehman ([welehman@hmslegal.com](mailto:welehman@hmslegal.com)). PSU is willing to extend the same courtesy upon request of any other party for any e-mails or electronic service to the parties.

**II. SETTLEMENT**

There have been no settlement discussions to date, but PSU is willing to participate in settlement discussions with the other parties.

**III. DISCOVERY**

PSU will work with all parties to this proceeding to develop a mutually-agreeable discovery plan and schedule, including but not limited to modifications to regulations or procedures.

**IV. SCHEDULE**

PSU is willing to work with the parties to develop a proposed schedule that gives sufficient time for necessary discovery and submission of testimony.

**V. WITNESSES**

PSU's witness in this matter will be James L. Crist, P.E. The business address, telephone number and e-mail address of Mr. Crist and Mr. Prinkey are:

James L. Crist, P.E.  
Lumen Group, Inc.  
4226 Yarmouth Drive, Suite 101  
Allison Park, PA 15101  
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Michael Prinkey, P.E.  
Senior Energy Program Engineer  
The Pennsylvania State University  
Office of Physical Plant  
147C Physical Plant Building  
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PSU requests that copies of all interrogatories, answers to interrogatories, testimony and exhibits submitted (other than First Energy's initial filing materials) be e-mailed directly to Mr. Crist at [JLCrist@aol.com](mailto:JLCrist@aol.com) and to Mr. Prinkey at [mip103@psu.edu](mailto:mip103@psu.edu).

If needed, Mr. Crist or Mr. Prinkey may present testimony regarding the effect of First Energy's Default Service Plan on the service and rates provided to PSU and particularly regarding these issues as they relate to Tariff 38.

Additionally, PSU may offer the direct testimony of a member of its Office of Physical Plant - Energy and Engineering Division regarding rate and service issues created or raised by the filing and its offered supporting information. PSU reserves the right to adopt any testimony of other witnesses, in whole or in part, and to offer additional witnesses and exhibits as may be necessary to address the testimony, exhibits, or evidence that may be presented by any party in this proceeding.

## VI. ISSUES

At this juncture, and subject to discovery and issues raised by other parties, PSU intends to pursue the issue of the effect of First Energy's Default Service Plan on the service and rates provided to PSU and particularly regarding these issues as they relate to Tariff 38. PSU's position will be finalized in its evidence and briefs submitted under the schedule developed in this case.

## VII. EVIDENCE

PSU reserves the right to submit pre-filed direct testimony and associated exhibits concerning the issues raised above. PSU may also present additional testimony and exhibits after discovery or in response to testimony or exhibits introduced by any party or witness in this proceeding.

WHEREFORE, the Pennsylvania State University respectfully submits this Prehearing Conference Memorandum in satisfaction of Your Honor's Prehearing Conference Order dated December 21, 2017.

Respectfully submitted,



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*Counsel for  
The Pennsylvania State University*

Dated: January 15, 2018

## 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 FIRST CLASS U.S. MAIL AND ELECTRONIC MAIL

The Honorable Mary D. Long  
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Thomas J. Sniscak  
William E. Lehman

Dated this 15<sup>th</sup> day of January, 2018.