



COMMONWEALTH OF PENNSYLVANIA
PENNSYLVANIA PUBLIC UTILITY COMMISSION
P.O. BOX 3265, HARRISBURG, PA 17105-3265

IN REPLY PLEASE
REFER TO OUR FILE

January 16, 2018

Secretary Rosemary Chiavetta
Pennsylvania Public Utility Commission
P.O. 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, P-2017-2637866

Dear Secretary Chiavetta:

Enclosed please find the Bureau of Investigation and Enforcement's (I&E)
Prehearing Memorandum in the above captioned proceeding.

Copies are being served on parties as identified in the attached certificate of
service. If you have any questions, please contact me a 717-783-7998.

Sincerely,

Allison C. Kaster
Deputy Chief Prosecutor
Bureau of Investigation and Enforcement
PA Attorney I.D. No. 93176

Gina L. Miller
Prosecutor
Bureau of Investigation and Enforcement
PA Attorney I.D. No. 313863

ACK/GLM/snc
Enclosure

cc: Certificate of Service
ALJ Mary D. Long

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Joint Petition of Metropolitan Edison Company,	:	Docket No. P-2017-2637855
Pennsylvania Electric Company, Pennsylvania	:	Docket No. P-2017-2637857
Power Company and West Penn Power Company	:	Docket No. P-2017-2637858
for Approval of their Default Service Programs	:	Docket No. P-2017-2637866

PREHEARING MEMORANDUM
OF THE
BUREAU OF INVESTIGATION AND ENFORCEMENT

TO ADMINISTRATIVE LAW JUDGE MARY D. LONG:

Pursuant to the Prehearing Conference Order dated December 21, 2017, the Bureau of Investigation and Enforcement (I&E) of the Pennsylvania Public Utility Commission (Commission) respectfully submits the following Prehearing Memorandum.

I. BACKGROUND

On December 11, 2017, Metropolitan Edison Company, Pennsylvania Electric Company, Pennsylvania Power Company and West Penn Power Company (collectively, the Companies) filed a Petition for approval of their Default Service Programs for the period from June 1, 2019 through May 31, 2023 pursuant to Pennsylvania's Electricity Generation Customer Choice and Competition Act at 66 Pa. C.S. § 2801, Act 129 of 2008, the Commission's default service regulations at 52 Pa. Code §§ 54.181-54.190, and the Commission's default service policy statement at 52 Pa. Code §§ 69.1801-1817.

I&E filed its Notice of Appearance on January 12, 2018.

A telephonic Prehearing Conference is scheduled at 1:30 pm on Wednesday, January 17, 2018, with Administrative Law Judge Mary D. Long presiding.

II. SERVICE ON I&E

The Bureau of Investigation and Enforcement Prosecutors in these proceedings are Allison C. Kaster and Gina L. Miller. Contact information is as follows:

By mail: Allison C. Kaster, Esquire
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(717) 787-8754

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I&E requests that electronic transmittal of materials, followed by hard copy delivery via first-class mail, satisfy the service requirement.

III. ISSUES

I&E has identified the proposal to make permanent the purchase of receivables clawback charge that was approved in the prior default service proceeding on a pilot basis and the scope of shopping available to customers participating in customer assistance programs as potential issues in this proceeding. I&E reserves the right to pursue additional issues pending discovery and analysis of the positions taken by other parties.

IV. DISCOVERY

I&E does not propose any modifications to the Commission's discovery rules.

V. WITNESSES

It is currently expected that I&E may call the following expert witness, without being limited thereto:

Christopher Keller, Fixed Utility Valuation Engineer

The I&E witness may be contacted through the information provided above. The witness list is provided without the benefit of complete discovery or analysis of the positions of other parties to this proceeding. Accordingly, I&E reserves the right to call additional witnesses or withdraw the name of the witness listed above.

VI. LITIGATION SCHEDULE

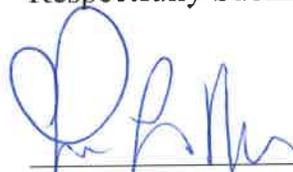
I&E supports the following schedule, which has been proposed by the Companies:

	Proposed
Other Parties' Direct Testimony	February 22, 2018
Rebuttal Testimony	March 22, 2018
Surrebuttal Testimony	April 4, 2018
Rejoinder/ Hearings	April 10-11, 2018
Main Brief	May 1, 2018
Reply Brief	May 15, 2018

VII. SETTLEMENT

I&E is willing to make good faith efforts to successfully resolve this matter through settlement. In the event settlement discussions fail to result in a full and complete resolution of the matter, I&E is prepared to fully or partially litigate this proceeding.

Respectfully Submitted,



Allison C. Kaster
Senior Prosecutor
PA Attorney I.D. # 93176

Gina L. Miller
Prosecutor
PA Attorney I.D. # 313863

Bureau of Investigation and Enforcement
Pennsylvania Public Utility Commission
Post Office Box 3265
Harrisburg, Pennsylvania 17105-3265
(717) 787-1976

Dated: January 16, 2018

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Joint Petition of Metropolitan Edison	:	Docket Nos. P-2017-2637855
Company, Pennsylvania Electric Company,	:	P-2017-2637857
Pennsylvania Power Company and West Penn	:	P-2017-2637858
Power Company for approval of their	:	P-2017-2637866
Default Service Programs	:	

CERTIFICATE OF SERVICE

I hereby certify that I am serving the foregoing **Prehearing Memorandum** dated January 16, 2018, in the manner and upon the persons listed below, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a party):

Served via Electronic and First-Class Mail

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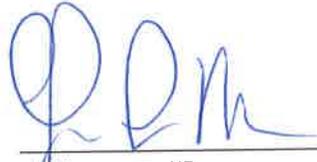
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