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January 16, 2018

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor
Harrisburg, PA 17120

VIA ELECTRONIC FILING

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:

Attached for filing with the Pennsylvania Public Utility Commission is the Prehearing Memorandum of the Met-Ed Industrial Users Group ("MEIUG"), the Penelec Industrial Customer Alliance ("PICA") and the West Penn Power Industrial Intervenors ("WPPII") (collectively, the "Industrials"), in the above-referenced proceedings.

As shown by the attached Certificate of Service, all parties to these proceedings are being duly served. Thank you.

Very truly yours,

McNEES WALLACE & NURICK LLC

By 
Alessandra L. Hylander

Counsel to the Met-Ed Industrial Users Group,
the Penelec Industrial Customer Alliance and
the West Penn Power Industrial Intervenors

/leh
Enclosures

c: Administrative Law Judge Mary D. Long (via e-mail and First-Class Mail)
Certificate of Service

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CERTIFICATE OF SERVICE

I hereby certify that I am this day serving a true copy of the foregoing document upon the participants listed below in accordance with the requirements of 52 Pa. Code Section 1.54 (relating to service by a participant).

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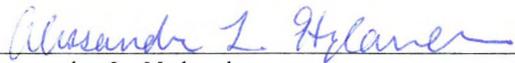
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Dated this 16th day of January, 2018, at Harrisburg, Pennsylvania

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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

**JOINT PREHEARING MEMORANDUM OF
THE MET-ED INDUSTRIAL USERS GROUP,
THE PENELEC INDUSTRIAL CUSTOMER ALLIANCE AND
THE WEST PENN POWER INDUSTRIAL INTERVENORS**

Pursuant to the December 21, 2017, Prehearing Conference Order issued by Administrative Law Judge ("ALJ") Mary D. Long, the Met-Ed Industrial Users Group ("MEIUG"), the Penelec Industrial Customer Alliance ("PICA"), Pennsylvania Power Company ("Penn Power"), and the West Penn Power Industrial Intervenors ("WPPII") (collectively, the "Industrials") hereby submit this Prehearing Memorandum in the above-captioned proceedings.

I. HISTORY OF THE PROCEEDINGS

On December 4, 2017, the Metropolitan Edison Company ("Met-Ed"), Pennsylvania Electric Company ("Penelec"), and West Penn Power Company ("West Penn") (collectively, "Companies") petitioned the Pennsylvania Public Utility Commission ("PUC" or "Commission") for approval of a proposed plan for the terms and conditions under which the Companies would supply default service from June 1, 2019, through May 31, 2023.¹

¹ *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, et al. (Dec. 4, 2017) ("Joint Petition" or "DSP V").

On December 22, 2017, the Industrials filed a Joint Petition to Intervene in these proceedings. A description of the Industrials is set forth in Paragraphs 1 and 2 of the Joint Petition to Intervene.

A Prehearing Conference has been scheduled in these proceedings for January 17, 2018.

II. SERVICE LIST

For purposes of service in the above-captioned proceedings, please direct all communications to:

Susan E. Bruce (Pa. I.D. No. 80146)
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III. ANTICIPATED ISSUES AND SUB-ISSUES

As users of substantial volumes of electricity in the Companies' service territories, the Industrials are directly impacted by changes to the terms and conditions of their electricity service and, thus, are concerned with the resolution of the Companies' proposed DSPs. The Commission's final disposition of the Companies' DSPs will directly affect the rates and terms of service that the Companies impose on the Industrials, whether or not they receive default service. In addition, the Industrials must further consider several of the Companies' proposals set forth in DSP V, such as the establishment of a retail market enhancement rate mechanism. As such, the

Industrials seek to intervene in these proceedings in order to pursue any issues in the proposed DSPs or in other parties' direct testimony that could adversely impact them.

IV. PROPOSED WITNESSES

The Industrials are evaluating whether they will sponsor testimony in these proceedings. If the Industrials decide to sponsor testimony, they will inform the parties and the ALJ of any intended witnesses and topics of testimony. The Industrials also intend to participate in these proceedings 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 Industrials will cooperate with the ALJ and the parties at the Prehearing Conference to develop an appropriate procedural schedule, including a schedule for submitting reply briefs no later than May 15, 2018, and discovery rules in accordance with the Commission's regulations and any directives issued by the ALJ.

VI. POSSIBILITY OF SETTLEMENT

The Industrials are willing to participate in discussions with the other parties in an attempt to amicably resolve the issues in these proceedings, subject to the approval of the Commission.

Respectfully submitted,

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Dated: January 16, 2018