

January 16, 2018

Via Electronic Filing

Rosemary 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. P-2017-2637855, P-2017-2637857, P-2017-2637858, P-2017-2637866

Dear Secretary Chiavetta:

Enclosed for filing on behalf of Calpine Energy Solutions, LLC is its Prehearing Memorandum in the above-referenced matter. Copies of the Prehearing Memorandum are being served in accordance with the attached Certificate of Service.

Should you have any questions or require additional information, please do not hesitate to contact me.

Very truly yours,

THOMAS, NIESEN & THOMAS, LLC

By



Charles E. Thomas, III

Enclosure

cc: Certificate of Service (w/encl.)
Becky Merola (w/encl.)

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

**PREHEARING MEMORANDUM OF
CALPINE ENERGY SOLUTIONS, LLC**

AND NOW, comes Calpine Energy Solutions, LLC (“Calpine Solutions”), by its counsel, and submits this Prehearing Memorandum in accordance with the Prehearing Conference Order of Administrative Law Judge Mary D. Long, dated December 21, 2017, and in connection with the initial Prehearing Conference scheduled in the above-captioned matter for January 17, 2018.

I. Introduction

On December 11, 2017, Metropolitan Edison Company, Pennsylvania Electric Company, Pennsylvania Power Company, and West Penn Power Company (collectively, the “FirstEnergy Companies”) filed a joint petition requesting Commission approval of their fifth Default Service Programs (“Programs”). The Programs seek to establish terms and conditions under which the FirstEnergy Companies will procure default service supplies, provide default service to non-shopping customers, satisfy requirements imposed by the Alternative Energy Portfolio Standards Act (73 P.S. §§ 1648.1-1648.8), and recover associated costs on a full and current basis for the period beginning June 1, 2019 through May 31, 2023.

Notices related to the filing of the joint petition were published in the *Pennsylvania Bulletin* on December 23, 2017. 47 Pa.B. 7809-7811. Calpine Solutions timely filed a Petition to Intervene on January 12, 2018. Calpine Solutions incorporates by reference the statements and

information provided in its Petition to Intervene and respectfully requests that Judge Long grant its intervention.

II. Issues

Calpine Solutions is still in the process of reviewing the FirstEnergy Companies' filing, formulating its position on the matters presented therein, and identifying any issues it may elect to pursue. Calpine Solutions reserves the right to present its position on these issues in accordance with the litigation schedule established for this proceeding and expects to participate to the extent necessary to protect its interests and those of its customers.

III. Plan and Schedule of Discovery

Calpine Solutions will cooperate with Judge Long and the other parties at the Prehearing Conference to develop a proposed plan and schedule for discovery, as well as any reasonable modifications to the Commission's discovery rules.

IV. Witnesses

Calpine Solutions is still evaluating whether it will sponsor witness testimony in this proceeding and reserves the right to submit direct, rebuttal, and/or surrebuttal testimony to the extent it deems necessary. If testimony is submitted, Calpine Solutions will notify Judge Long and the parties of the identity of any witness and the subject matter of the testimony. Calpine Solutions, furthermore, will comply with all deadlines established in the proceeding for the service of testimony.

V. Proposed Litigation Schedule

Calpine Solutions will work with Judge Long and the other parties at the Prehearing Conference to finalize a schedule for the submission of testimony, hearings, and briefs.

VI. Settlement

Calpine Solutions will actively participate in settlement discussions as they may occur.

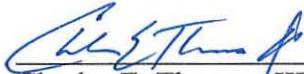
VII. Service of Documents

Calpine Solutions agrees to accept electronic service of all documents for this proceeding, with a hard copy to follow by regular mail. Service should be made on Calpine Solutions' counsel:

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Calpine Solutions asks that a copy of any electronically served document also be served on Becky Merola, Director of Government & Regulatory Affairs for Calpine Solutions (Becky.Merola@calpinesolutions.com).

Respectfully submitted,



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Counsel for Calpine Energy Solutions, LLC

DATED: January 16, 2018

CERTIFICATE OF SERVICE

I hereby certify that I have this 16th day of January, 2018, served a true and correct copy of the foregoing document upon the upon the persons listed below, in accordance with the requirements of 52 Pa. Code § 1.54:

VIA EMAIL AND FIRST CLASS MAIL

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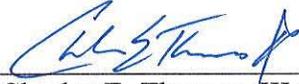
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