



March 12, 2018

Via Electronic Filing
Honorable Mary D. Long
Administrative Law Judge,
Pennsylvania Public Utility Commission
Piatt Place, Suite 220
301 Fifth Avenue
Pittsburgh, PA 15222

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 for the
period commencing June 1, 2019 through May 31, 2023**

Docket Nos. P-2017-2637855
P-2017-2637857
P-2017-2637858
P-2017-2637866

Dear Judge Long:

Enclosed is a corrected version of CAUSE-PA Statement No. 1, the Direct Testimony of Harry Geller.

In a recent order in an unrelated case, the Commission clarified that a table in its *2016 Report on Universal Service Programs & Collections Performance of the Pennsylvania Electric Distribution Companies & Natural Gas Distribution Companies* which stated that it showed energy burdens of CAP participants, actually showed energy burdens for low-income households without the benefit of CAP assistance. This is not apparent from the report itself and Mr. Geller relied on that report in the presentation of his testimony, specifically, **Table 2**, on page 9 of his Direct Testimony and the paragraph that follows.

To avoid confusion, we submit this corrected version of Mr. Geller's testimony. I have appended here, a corrected page 9, in a red-line format so that the changes can be easily seen. I have also appended a clean version of the full corrected testimony and exhibits with these changes made therein.

We apologize for having to make this correction but wanted to make it now in case it otherwise affects any parties' rebuttal testimony in this proceeding.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "Patrick Cicero".

Patrick Cicero

Counsel for CAUSE-PA

CC: Rosemary Chiavetta, PUC Secretary (*via efilng*) (Cover Letter Only)
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 for the
period commencing June 1, 2019 through May 31, 2023**

**Docket Nos. P-2017-2637855
P-2017-2637857
P-2017-2637858
P-2017-2637866**

I hereby certify that on March 12, 2018, I have served true and correct copies of the foregoing letter and the corrected version of CAUSE-PA Statement No. 1, the Direct Testimony of Harry Geller, via email and/or first-class mail upon the following persons, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a party).

VIA FIRST CLASS MAIL & EMAIL	
<p>Honorable Mary D. Long Administrative Law Judge, Pennsylvania Public Utility Commission Piatt Place, Suite 220 301 Fifth Avenue Pittsburgh, PA 15222</p>	
<p>Tori L. Giesler, Esq. FirstEnergy Service Company 2800 Pottsville Pike P.O. Box 16001 Reading, PA 19612-6001 (Counsel for Companies)</p>	<p>Daniel G. Asmus, Esq. Office of Small Business Advocate Suite 202, Commerce Building 300 North Second Street Harrisburg, PA 17101 (Counsel for OSBA)</p>
<p>Aron Beatty, Esq. Hayley Dunn, Esq. Office of Consumer Advocate 555 Walnut Street 5th Floor, Forum Place Harrisburg, PA 17101-1923 (Counsel for OCA)</p>	<p>Allison C. Kaster, Esq. Gina L. Miller, Esq. Bureau of Investigation & Enforcement Pennsylvania Public Utility Commission P.O. 3265 Harrisburg, PA 17105-3265 (Counsel for I/E)</p>

<p>Karen O. Moury, Esq. Eckert Seamans Cherin & Mellott, LLC 213 Market Street, 8th Floor Harrisburg, PA 17101 (Counsel for Respond Power, LLC)</p>	<p>Thomas J. Sniscak, Esq. William E. Lehman, Esq. Christopher M. Arfaa, Esq. Hawke McKeon & Sniscak LLP 100 North 10th Street Harrisburg, PA 17101 (Counsel for PSU)</p>
<p>Charis Mincavage, Esq. Susan East Bruce, Esq. Vasiliki Karandrikas, Esq. Alessandra L. Hylander, Esq. McNees, Wallace & Nurick, LLC 100 Pine Street P.O. Box 1166 Harrisburg, PA 17108-1166 (Counsel for Industrial Intervenors)</p>	<p>Holly Rachel Smith, Esq. Exelon Business Services Corporation 701 9th Street, NW Mailstop EP2205 Washington, DC 20068 (Counsel for Exelon Generation and Constellation)</p>
<p>Deanne M. O'Dell, Esq. Sarah C. Stoner, Esq. Daniel Clearfield, Esq. Eckert Seamans Cherin & Mellott, LLC 213 Market Street., 8th Floor Harrisburg, PA 17101 (Counsel for RESA)</p>	<p>Todd S. Stewart, Esq. Hawke McKeon & Sniscak, LLP 100 N. Tenth Street Harrisburg, PA 17101 (Counsel for Next Era Energy)</p>
<p>Charles E. Thomas III, Esq. THOMAS, NIESEN & THOMAS, LLC 212 Locust Street, Suite 302 Harrisburg, PA 17101 (Counsel for Calpine)</p>	<p>Carl R. Shultz, Esquire Eckert Seamans Cherin & Mellott, LLC 213 Market St., 8th Floor Harrisburg, PA 17101 (Counsel for Direct Energy)</p>
<p>VIA EMAIL ONLY: Mr. Robert Knecht – rdk@indecon.com James L. Crist - JLCrist@aol.com Lael Campbell – lael.campbell@constellation.com Michael Prinkey – mip103@psu.edu Barbara R. Alexander – barbalex@ctel.net Steven Estomin – sestomin@exeterassociates.com</p>	



Patrick M. Cicero, PA ID 89039
pulp@palegalaid.net

March 12, 2018

On Behalf of CAUSE-PA