

COMMONWEALTH OF PENNSYLVANIA



OFFICE OF CONSUMER ADVOCATE

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January 12, 2018

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 171020

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 electronic filing please find the Office of Consumer Advocate's Notice of Intervention and Public Statement in the above-referenced proceeding.

Copies have been served per the attached Certificate of Service.

Respectfully submitted,

A handwritten signature in blue ink that reads "Hayley E. Dunn".

Hayley E. Dunn
Assistant Consumer Advocate
PA Attorney I.D. 324763
E-Mail: HDunn@paoca.org

Enclosures:

cc: Honorable Mary D. Long
Certificate of Service
*243025

CERTIFICATE OF SERVICE

Re: 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

I hereby certify that I have this day served a true copy of the following document, the Office of Consumer Advocate's Notice of Intervention and Public Statement, upon parties of record in this proceeding in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant), in the manner and upon the persons listed below:

Dated this 12th day of January 2018.

SERVICE BY E-MAIL AND FIRST CLASS MAIL, POSTAGE PREPAID

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BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

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

NOTICE OF INTERVENTION OF THE
OFFICE OF CONSUMER ADVOCATE

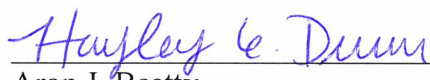
Pursuant to 52 Pa. Code Sections 5.71-74, the Office of Consumer Advocate hereby gives Notice of Intervention in the above-captioned proceeding. A copy of all correspondence, notices, documents, orders or other communications with respect to the above-captioned proceeding should be addressed to the following:

Aron J. Beatty
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Respectfully submitted,


Aron J. Beatty
Senior Assistant Consumer Advocate

Hayley E. Dunn
Assistant Consumer Advocate

Dated: January 12, 2018

PUBLIC STATEMENT OF THE
OFFICE OF CONSUMER ADVOCATE
PURSUANT TO 71 P.S. SECTION 309-4(e)

Act 161 of the Pennsylvania General Assembly, 71 P.S. Section 309-2, as enacted July 9, 1976, authorizes the Consumer Advocate to represent the interests of consumers before the Pennsylvania Public Utility Commission (Commission). In accordance with Act 161, and for the following reasons, the Acting Consumer Advocate determined to file an Answer and intervene in the proceeding before the Commission involving Metropolitan Edison Company (Met-Ed), Pennsylvania Electric Company (Penelec), Pennsylvania Power Company (Penn Power), and West Penn Power Company (West Penn) (collectively, Companies).

On December 11, 2017, the Companies filed with the Commission a Joint Petition for Approval of Their Default Service Programs (Petition). The Companies' proposed default service programs (DSPs) cover a four-year period, from June 1, 2019 to May 31, 2023. Petition at 5. In their Petition, the Companies propose to acquire full-requirements, load-following default service products for residential customers through a competitive procurement process. Petition at 7. The Companies propose that each residential tranche will have a 95% fixed-price supply as well as a 5% real-time hourly load locational marginal price (LMP). Petition at 9. Residential products will have staggered 12 and 24-month terms. Petition at 9. The Companies plan to conduct a total of 18 procurements throughout the four-year period in the months of January, April, June, and October/ November. Petition at 10. The procurement process will consist of "descending-price clock auctions." Petition at 10.

In their Petition, the Companies also propose to modify their Price to Compare (PTC) Default Service Rate Riders to include a "retail market enhancement rate mechanism," or PTC Adder. Petition at 16. The Companies further propose to continue their existing Customer Referral Program (CRP), including the cost recovery methodology, and continue the pilot

Purchase of Receivables (POR) clawback charge. Petition at 18-19. The Companies do not make any proposals related to Customer Assistance Program (CAP) shopping.

The Acting Consumer Advocate determined to intervene and participate in this proceeding in order to protect the interests of the Companies' residential customers. In particular, the Acting Consumer Advocate seeks to ensure that any default service rates approved as a result of this proceeding are just and reasonable, consistent with the requirements of Act 129 of 2008 (Act 129), and otherwise in accordance with the Commission's regulations and related orders.