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January 12, 2018

**Via Electronic Filing**

Rosemary Chiavetta, Secretary  
PA Public Utility Commission  
PO Box 3265  
Harrisburg, PA 17105-3265

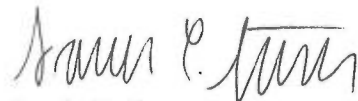
Re: Joint Petition of Metropolitan Edison Company, Pennsylvania Electric Company,  
Pennsylvania Power Company and West Penn Power Company for Approval of Their  
Default Service Program (DSP-V) – Docket Nos. P-2017-2637855; P-2017-2637857;  
P-2017-2637858; and P-2017-2637866

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Dear Secretary Chiavetta:

Enclosed for electronic filing please find the Retail Energy Supply Association's Prehearing Memorandum with regard to the above-referenced matters. Copies to be served in accordance with the attached Certificate of Service.

Sincerely,



Sarah C. Stoner

Enclosure

cc: Hon. Mary D. Long w/enc.  
Cert. of Service w/enc.

## CERTIFICATE OF SERVICE

I hereby certify that this day I served a copy of RESA's Prehearing Memorandum upon the persons listed below in the manner indicated in accordance with the requirements of 52 Pa. Code Section 1.54.

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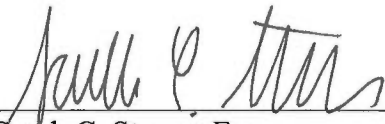
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Dated: January 12, 2018

  
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Sarah C. Stoner, Esq.

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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

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**PREHEARING MEMORANDUM  
OF RETAIL ENERGY SUPPLY ASSOCIATION**

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Subject to the granting of its Petition to Intervene filed on January 12, 2018 and pursuant to 52 Pa. Code §§ 5.72-5.75, the public notices published in the Pennsylvania Bulletin on December 23, 2017, and the Prehearing Conference Order dated December 21, 2017, the Retail Energy Supply Association (“RESA”)<sup>1</sup> submits this Prehearing Memorandum.

**I. SERVICE OF DOCUMENTS**

RESA requests that all documents be served on:

Deanne M. O’Dell, Esquire  
Eckert Seamans Cherin & Mellott, LLC  
213 Market St., 8th Floor  
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717.237.6000  
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RESA also agrees to receive service of documents electronically in this proceeding. To the extent that materials are available electronically, it is requested that copies be served upon:

Daniel Clearfield – dclearfield@eckertseamans.com

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<sup>1</sup> The comments expressed in this filing represent the position of the Retail Energy Supply Association (RESA) as an organization but may not represent the views of any particular member of the Association. Founded in 1990, RESA is a broad and diverse group of more than twenty retail energy suppliers dedicated to promoting efficient, sustainable and customer-oriented competitive retail energy markets. RESA members operate throughout the United States delivering value-added electricity and natural gas service at retail to residential, commercial and industrial energy customers. More information on RESA can be found at [www.resausa.org](http://www.resausa.org).

Deanne O'Dell – dodell@eckertseamans.com  
Sarah C. Stoner – sstoner@eckertseamans.com

**II. SETTLEMENT**

RESA is willing to participate in settlement discussions with any party to narrow the issues in this matter.

**III. PROPOSED PLAN AND SCHEDULE OF DISCOVERY**

RESA is amenable to working with the other parties in this matter to adopt a reasonable proposed plan and schedule of discovery. RESA does not have any proposals regarding discovery modifications.

**IV. SCHEDULE FOR SUBMISSION OF TESTIMONY, HEARINGS AND BRIEFS**

RESA will cooperate with the other parties and the ALJ to facilitate a workable litigation schedule.

**V. WITNESSES**

At this time, RESA anticipates presenting testimony in this matter addressing consistent with Section VI below. Although RESA has not yet identified a witness, it will provide the Presiding Officer as well as the other parties in this matter reasonable notice. RESA also reserves its right to add additional witnesses or change the identity of its witnesses at any time upon appropriate notice to the Presiding Officer and the parties.

**VI. PRESENTLY IDENTIFIED ISSUES**

RESA is a trade association of power marketers, independent power producers, and a broad range of companies within the Mid-Atlantic marketplace, each of whom support the electric services industry and seek to develop a more competitive power industry. RESA

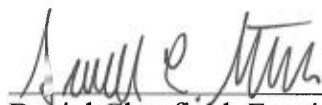
members are licensed to sell electric energy in the markets of Pennsylvania's major electric distribution companies ("EDCs"), including the service territories of the Companies.

RESA has identified the following issues that should be examined in this proceeding:

- Whether the Companies' overall default service supply plan is consistent with the Commission's regulations and the Public Utility Code.
- The effectiveness of the Companies' default service plan to promote retail market development for the benefit of consumers in the Companies' service territories.
- Whether the Companies' proposed rate design and tariffs for default generation service, including recovery of all of the Companies' costs associated with the provision of default service, is consistent with the Commission's regulations and the Public Utility Code.
- The appropriateness of the Companies' proposal to transition the hourly-priced threshold to 100 kW.
- Whether the Companies' proposal to modify their Price to Compare Default Service Rate Riders to include a non-bypassable retail market enhancement rate mechanism is appropriate.
- The appropriateness of the Companies' proposal to continue their Customer Referral Programs from June 1, 2019 through May 31, 2023 without modification.
- Whether the Companies' proposal to continue utilizing the clawback clause of its purchase of receivables programs is appropriate.

At this time, RESA continues to evaluate its position on and will refine its position based on further study of the proposals, review of discovery and additional input from other parties. RESA reserves the right to address other issues identified through its continued review and analysis of the filing or raised by other parties.

Respectfully submitted,



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Date: January 12, 2018

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