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January 12, 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 Petition to Intervene in the above-referenced matter. Copies of the Petition 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
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PETITION TO INTERVENE OF CALPINE ENERGY SOLUTIONS, LLC

AND NOW, comes Calpine Energy Solutions, LLC (“Calpine Solutions”), by its counsel, and, pursuant to 52 Pa. Code § 5.71 *et seq.*, petitions the Pennsylvania Public Utility Commission (“Commission”) to intervene in the above-captioned proceeding. In support of its intervention, Calpine Solutions states as follows:

1. On December 11, 2017, Metropolitan Edison Company (“Met-Ed”), Pennsylvania Electric Company (“Penelec”), Pennsylvania Power Company (“Penn Power”), and West Penn Power Company (“West Penn”) (collectively referred to herein as the “FirstEnergy Companies”) filed a joint petition seeking Commission approval of their fifth Default Service Programs (“Programs”) 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, and recover associated costs on a full and current basis for the period beginning June 1, 2019 through May 31, 2023.

2. The name and business address of Petitioner are:

Calpine Energy Solutions, LLC
5325 Sheffield Ave.
Powell, Ohio 43065
Attention: Becky Merola
Director, Government & Regulatory Affairs
Becky.Merola@calpinesolutions.com

3. Calpine Solutions is represented in this proceeding by:

Charles E. Thomas III, Esq.
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Copies of all pleadings, discovery, correspondence, orders, and other documents in this proceeding should be served on the above counsel.

4. Calpine Solutions is a national provider of energy and energy-related services across 20 states, including Pennsylvania, and the District of Columbia, and is an active Commission-licensed electric generation supplier (“EGS”),¹ serving primarily commercial, industrial, and municipal customers, and where there are mixed meters some residential customers, throughout the Commonwealth of Pennsylvania, including in the FirstEnergy Companies’ service territories. As one of the nation’s largest independent, non-residential retailers and marketers of retail energy services, Calpine Solutions offers its customers a wide variety of energy-related products and services, including fixed, indexed, demand response, and green energy options, and also provides energy procurement and risk management solutions designed to meet the individual needs of its customers and capture the benefits of a deregulated utility environment. In addition to its product and service offerings, Calpine Solutions has built its own state of the art billing systems and uses dual billing exclusively for its Pennsylvania customers.

5. The Commission’s regulations permit intervention by a party that demonstrates an “interest which may be directly affected and which is not adequately represented by existing participants, and as to which the petitioner may be bound by the action of the Commission in the

¹ See Docket No. A-110141.

proceeding.” 52 Pa. Code § 5.72(a)(2). Intervention is also allowed where a party’s participation is in the public interest. 52 Pa. Code § 5.72(a)(3).

6. Calpine Solutions meets the standards for intervention set forth in 52 Pa. Code § 5.72(a). Calpine Solutions has a direct and substantial interest in ensuring that the Programs and, in particular, any of the FirstEnergy Companies’ proposed initiatives to enhance retail competition, including the customer referral programs, are implemented in a competitively neutral and non-discriminatory manner. Calpine Solutions also has a vested interest in ensuring that the Programs do not implement charges or costs that would harm the competitive market.

7. This proceeding will establish, among other things, the rates, terms, conditions, and structure of the FirstEnergy Companies’ default service programs against which Calpine Solutions must compete to serve FirstEnergy customers beginning June 1, 2019. The proceeding will also directly affect Calpine Solutions’ customers – regional and national commercial, industrial, and governmental customers, as well as small commercial customers as defined in the FirstEnergy Companies’ respective tariffs. Accordingly, Calpine Solutions’ intervention is necessary because its ability to market energy and energy-related products and services to existing and future retail customers in the FirstEnergy Companies’ service territories will be materially impacted by the outcome of this proceeding.

8. Calpine Solutions intends to participate in this proceeding to the extent necessary to protect its interests and those of its customers. These interests cannot be adequately represented or protected by any other existing party.

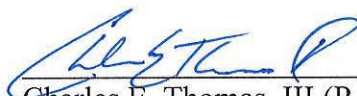
9. Calpine Solutions’ intervention is also in the public interest. Calpine Solutions possesses significant and unique knowledge, experience, and resources with respect to the marketing of retail energy services, which will be helpful in developing a record on the

reasonableness of the Programs and will serve to better protect the consumers of Pennsylvania. Moreover, without the opportunity to intervene, Calpine Solutions will be unable to participate in this proceeding, but will nevertheless be bound by the actions taken by the Commission. Such actions may have a material impact on Calpine Solutions' operations, business activities, and involvement in Pennsylvania and, more specifically, within the service territories of the FirstEnergy Companies.

10. Calpine Solutions continues to review the FirstEnergy Companies' joint petition and accompanying direct testimony and exhibits and has not yet determined its position on the many matters presented therein. Calpine Solutions reserves the right to take positions and/or seek relief based on its review of the various filings, the discovery responses, or the positions taken by the other parties in this proceeding.

WHEREFORE, Calpine Energy Solutions LLC respectfully requests that the Pennsylvania Public Utility Commission grant this Petition and authorize Calpine Solutions' intervention and participation in this proceeding as a full and active party.

Respectfully submitted,



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Counsel for Calpine Energy Solutions LLC

DATED: January 12, 2018

VERIFICATION

I, Becky Merola, Director of Government & Regulatory Affairs of Calpine Energy Solutions, LLC, hereby state that the facts set forth above are true and correct to the best of my knowledge, information and belief and that I expect to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa.C.S. § 4904 (relating to unsworn falsification to authorities).

Date: January 12, 2018



Becky Merola

CERTIFICATE OF SERVICE

I hereby certify that I have this 12th 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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