

Todd S. Stewart
Office: 717 236-1300 x242
Direct: 717 703-0806
tsstewart@hmslegal.com

100 North Tenth Street, Harrisburg, PA 17101 Phone: 717.236.1300 Fax: 717.236.4841 www.hmslegal.com

January 16, 2018

VIA ELECTRONIC FILING

Rosemary Chiavetta, Secretary Pennsylvania Public Utility Commission Commonwealth Keystone Building 400 North Street, Filing Room Harrisburg, PA 17120

RE: 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 June 1, 2019 Through May 31, 2023; Docket Nos. P-2017-2637855, P-2017-2637857, P-2017-2637858, and P-2017-2637866; PETITION TO INTERVENE

Dear Secretary Chiavetta:

Enclosed for filing with the Commission is the Petition to Intervene of NextEra Energy Marketing, LLC in the above-captioned proceedings. Copies of this Petition have been served in accordance with the attached Certificate of Service.

Thank you for your attention to this matter. If you have any questions related to this filing, please do not hesitate to contact my office.

Very truly yours.

Todd S. Stewart Counsel for

NextEra Energy Marketing, LLC

TSS/jld Enclosure

cc: Administrative Law Judge Mary D. Long

Per Certificate of Service

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the foregoing document upon the parties, listed below, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a party).

VIA ELECTRONIC AND FIRST CLASS MAIL

The Honorable Mary D. Long Administrative Law Judge Piatt Pace, Suite 220 301 5th Avenue Pittsburgh, PA 15222 malong@pa.gov

Daniel G. Asmus Assistant Small Business Advocate Office of Small Business Advocate 300 North Second Street, Suite 202 Harrisburg, PA 17101 dasmus@pa.gov

Allison C. Kaster, Esquire
Gina L. Miller
PA Public Utility Commission
Bureau of Investigation and Enforcement
PO Box 3265
Harrisburg, PA 17105-3265
akaster@pa.gov
ginmiller@pa.gov.

Thomas J. Sniscak, Esquire
Christopher M. Arfaa, Esquire
William E. Lehman, Esquire
Hawke McKeon & Sniscak, LLP
100 North Tenth Street
Harrisburg, PA 17101
tjsniscak@hmslegal.com
cmarfaa@hmslegal.com
welehman@hmslegal.com
Counsel for The Pennsylvania State University

Susan E. Bruce
Charis Mincavage
Vasiliki Karandrikas
Alessandra L. Hylander
McNees Wallace & Nurick LLC
100 Pine Street, PO Box 1166
Harrisburg, PA 17108
sbruce@mcneeslaw.com
cmincavage@mcneeslaw.com
vkarandrikas@mcneeslaw.com
ahylander@mcneeslaw.com
Counsel for Met-Ed Industrial Users Group, the
Penelec Industrial Customer Alliance, and the
West Penn Power Industrial Intervenors

Tori L. Giesler, Esquire
FirstEnergy Service Company
2800 Pottsville Pike
PO Box 16001
Reading, PA 19612-6001
tgiesler@firstenergycorp.com
Counsel for CAUSE-PA

Patrick M. Cicero, Esquire
Kadeem G. Morris, Esquire
Elizabeth R. Marx, Esquire
Pennsylvania Utility Law Project
118 Locust Street
Harrisburg, PA 17101
pulp@palegalaid.net

Holly Rachel Smith
Assistant General Counsel
Exelon Business Services Corp.
701 9th Street, NW Mailstop EP2205
Washington, DC 20068
Holly.smith@exeloncorp.com
Counsel for Exelon Generation Company, LLC
and Constellation NewEnergy, Inc.

Daniel Clearfield, Esquire
Deanne M. O'Dell, Esquire
Sarah C. Stoner, Esquire
Eckert Seamans Cherin & Mellott, LLC
213 Market Street, 8th Floor
Harrisburg, PA 17101
dclearfield@eckertseamans.com
dodell@eckertseamans.com
sstoner@eckertseamans.com
Counsel for RESA

Karen O. Moury, Esquire
Eckert Seamans Cherin & Mellott, LLC
213 Market Street, 8th Floor
Harrisburg, PA 17101
kmoury@eckertseamans.com
Counsel for Respond Power, LLC

DATED: January 16, 2018

Aron J. Beatty
Senior Assistant Consumer Advocate
Hayley E. Dunn
Assistant Consumer Advocate
Office of Consumer Advocate
555 Walnut Street
5th Floor, Forum Place
Harrisburg, PA 17101
tmccloskey@paoca.org

Charles E. Thomas, III, Esquire
Thomas Niesen & Thomas, LLC
212 Locust Street, Suite 302
Harrisburg, PA 17101
Cet3@tntlawfirm.com
Counsel for Calpine Energy Solutions, LLC

Todd S Stewar

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

Petition of Metropolitan Edison Company, : Docket Nos. P-2017-2637855

Pennsylvania Electric Company, : P-2017-2637857 Pennsylvania Power Company, and West : P-2017-2637858

Penn Power Company for Approval of Their : P-2017-2637866

Default Service Programs for the Period :

June 1, 2019 Through May 31, 2023 :

PETITION TO INTERVENE OF NEXTERA ENERGY MARKETING, LLC

NOW COMES NextEra Energy Marketing, LLC, ("NextEra") by and through its counsel, Hawke McKeon & Sniscak, LLP, and respectfully petitions to intervene in the above-captioned proceedings. In support thereof, NextEra states and avers as follows:

- 1. NextEra is an affiliate of NextEra Energy Resources, LLC ("NEER"), a company that owns and operates over 19,000 megawatts ("MW") of electric generating capacity in 29 states and Canada.
- 2. NextEra is an active wholesale supplier of electricity products in the Commonwealth of Pennsylvania. NextEra has an interest in how and when Metropolitan Edison Company, Pennsylvania Electric Company, Pennsylvania Power Company and West Penn Power Company meet their default service requirements. As an active wholesale supplier of electricity products, NextEra has a substantial and unique interest in this proceeding that cannot adequately be represented by any other party, and NextEra will be bound by any decision rendered by the Pennsylvania Public Utility Commission in this matter. Accordingly, NextEra's

participation in this proceeding meets the standard for intervention set forth in the Commission's Regulations at 52 Pa. Code §§ 5.71, et seq.

3. Representing the NextEra in this proceeding is the following counsel:

Todd S. Stewart
PA Attorney ID # 75556
Hawke McKeon & Sniscak, LLP
100 North Tenth Street
Harrisburg, PA 17101
Telephone: 717.236.1300

Facsimile: 717.236.4841 tsstewart@hmslegal.com

WHEREFORE, NextEra respectfully requests that its Petition to Intervene be granted and that it be afforded full party status in this matter.

Respectively submitted,

Todd S. Stewart

PA Attorney I.D. # 75556

Hawke McKeon & Sniscak, LLP

100 North Tenth Street Harrisburg, PA 17101

Telephone: 717.236.1300 Facsimile: 717.236.4841 tsstewart@hmslegal.com

Counsel for

NextEra Energy Marketing, LLC

DATED: January 16, 2018