

COMMONWEALTH OF PENNSYLVANIA



OFFICE OF CONSUMER ADVOCATE

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January 4, 2022

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

Re: Joint Petition of Metropolitan Edison Company,  
Pennsylvania Electric Company, Pennsylvania  
Power Company, and West Penn Power  
Company for Approval of Default Service  
Programs for the Period June 1, 2023 through  
May 31, 2027

Docket Nos. P-2021-3030012  
P-2021-3030013  
P-2021-3030014  
P-2021-3030021

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 proceedings.

Copies have been served as indicated on the enclosed Certificate of Service.

Respectfully submitted,

/s/ Harrison W. Breitman  
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Enclosures:

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Bureau of Technical Utility Services (**email only:** [dsearfoorc@pa.gov](mailto:dsearfoorc@pa.gov), [sdonnelly@pa.gov](mailto:sdonnelly@pa.gov))  
Office of Special Assistants (**email only:** [ra-OSA@pa.gov](mailto:ra-OSA@pa.gov))  
Certificate of Service

\*321749

CERTIFICATE OF SERVICE

Re: Joint Petition of Metropolitan Edison Company, : Docket Nos. P-2021-3030012  
Pennsylvania Electric Company, Pennsylvania : P-2021-3030013  
Power Company, and West Penn Power Company : P-2021-3030014  
for Approval of Default Service Programs for the : P-2021-3030021  
Period June 1, 2023 through May 31, 2027 :

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 4<sup>th</sup> day of January 2022.

**SERVICE BY E-MAIL ONLY**

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Fax: (717) 783-7152  
Dated: January 4, 2022  
\*321750

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Re: Joint Petition of Metropolitan Edison	:	
Company, Pennsylvania Electric Company,	:	Docket Nos. P-2021-3030012
Pennsylvania Power Company and West	:	P-2021-3030013
Penn Power Company For Approval of	:	P-2021-3030014
Their Default Service Programs	:	P-2021-3030021

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NOTICE OF INTERVENTION  
OF THE  
OFFICE OF CONSUMER ADVOCATE

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

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Respectfully submitted,

*/s/ Harrison W. Breitman*  
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Dated: January 4, 2022  
321684.doc

Counsel for:  
Patrick M. Cicero  
Acting Consumer Advocate

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 proceedings before the Commission involving Metropolitan Edison Company, Pennsylvania Electric Company, Pennsylvania Power Company and West Penn Power Company (Met-Ed, Penelec, Penn Power, West Penn or, jointly, the Companies).

On December 14, 2021, the Companies filed with the Commission a Petition for approval of their Default Service Plan for their generation customers. The Companies' existing Default Service plan is set to expire on May 31, 2023. The proposed Default Service Plan is for the period of June 1, 2023 through May 31, 2027. In their Petition, the Companies propose to acquire supply for residential customers through a series of load-following, full requirements supply contracts in approximately 50 megawatt (MW) tranches. For each residential tranche, 100% of the supply will be at a fixed price. The new contracts for residential products are proposed to have staggered 12, and 24-month terms. The Companies will procure default energy service through auctions occurring over the course of the four year period during the months of March and September.

The Acting Consumer Advocate determined to intervene in this proceeding to protect the interests of the Companies' residential customers. The Acting Consumer Advocate will seek to ensure that any default service rates that are approved as a result of this proceeding are just and reasonable, consistent with Pennsylvania law and meet the requirements of Act 129.