Joint 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 commencing June 1, 2023 through May 31, 2027

COMMONWEALTH OF PENNSYLVANIA PUBLIC UTILITIES COMMISSION

Docket No. P-2021-3030012 Docket No. P-2021-3030013 Docket No. P-2021-3030014 Docket No. P-2021-3030021

CPOWER PETITION TO INTERVENE

Pursuant to the Public Utilities Commission ("PUC") scheduling order in the above-captioned dockets, and the Rule 5.71, et seq. of the Commission's Regulations, 52 Pa. Code § 5.71, et seq., Enerwise Global Technologies, d/b/a CPower Energy Management ("CPower") moves to intervene in this proceeding. In support of this Petition, CPower states:

- On December 17, 2021, the Commission issued a NOTICE OF PROCEEDING AND OPPORTUNITY TO INTERVENE in the above-captioned matter and established a deadline for filing a petition to intervene of January 18, 2022.
- 2. CPower is a leading provider of distributed energy resource load management services in Pennsylvania and throughout the United States.
- 3. CPower is a Curtailment Service Provider in the PJM wholesale market and relies upon access to customer-authorized account and energy usage data from First Energy utilities and other Pennsylvania utilities to fulfill requirements of PJM market participation.

- 4. CPower supports the First Energy utilities' efforts to establish a Third-Party Data Access Tariff in order to promote efficient and secure access to customer data.
- 5. CPower has an interest which may be directly affected and which is not adequately represented by any other party, and is likely to be bound by the action of the Commission in this proceeding.
- 6. Granting this petition permitting CPower participation in this proceeding is in the public interest.

Wherefore, CPower respectfully requests that the Commission grant its Petition to Intervene and for such other and further relief as this cause may require.

Respectfully submitted,

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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 § 1.54 (relating to service by a party).

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