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April 21, 2022

VIA ELECTRONIC FILING

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 their Default Service Programs for the Period From June 1, 2023 through May 31, 2027; Docket Nos. P-2021-3030012, P-2021-3030013; P-2021-3030014; P-2021-3030021;
TESTIMONY

Dear Secretary Chiavetta:

Enclosed for filing with the Commission, please find the following in the above-captioned docket:

1. Shipley Statement No. 1 – Direct Testimony and Exhibits of Laura Greenholt-Tasto;
2. Shipley Statement No. 1-R – Rebuttal Testimony and Exhibit of Laura Greenholt-Tasto;
3. Shipley Statement No. 1-SR – Surrebuttal Testimony and Exhibits of Laura Greenholt-Tasto; and
4. Verification of Laura Greenholt-Tasto.

Copies of the cover letter 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 me.

Very truly yours,

Todd S. Stewart
Counsel for
Shipley Choice, LLC d/b/a Shipley Energy

TSS/jld
Enclosure

cc: Administrative Law Judge Jeffrey A. Watson (via email – jeffwatson@pa.gov)
Nick Miskanic, Legal Assistant (via email – nmiskanic@pa.gov)
Per Certificate of Service

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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

**DIRECT TESTIMONY
OF LAURA GREENHOLT-TASTO
ON BEHALF
OF SHIPLEY CHOICE LLC D/B/A SHIPLEY ENERGY**

SUBJECTS ADDRESSED

- 1. Customer Referral Program**
- 2. Solar Energy Purchase Recovery**

Shipley Statement No. 1
February 25, 2022

1 **I. INTRODUCTION**

2 **Q. Please state your name and business address for the record.**

3 A. My name is Laura Greenholt-Tasto and my business address is 415 Norway Street, York,
4 PA 17403.

5
6 **Q. By whom are you employed and in what capacity?**

7 A. Shipley Group, LP d/b/a Shipley Energy as Vice President of Marketing.

8
9 **Q. For whom are you appearing in this proceeding?**

10 A. Shipley Choice, LLC d/b/a Shipley Energy (“Shipley”).

11
12 **Q. Briefly describe your educational experience and relevant qualifications.**

13 A. I graduated in 2007 from the University of Delaware with a Bachelor of Science in
14 Marketing and Operations Management and a minor in Economics. After graduating, I
15 worked for Hess Corporation as a Natural Gas Logistics Analyst II for 2 years. In 2009, I
16 was hired by Shipley Energy as an Energy Supply Analyst. In 2012, I was promoted to
17 Manager of Natural Gas Operations. In February 2014, I became Manager of Choice
18 Operations, overseeing all operational functions related to supply, pricing, billing, sales,
19 and regulatory, for both electricity and natural gas product lines. I became General
20 Manager of Shipley Choice in July 2017, with an emphasis on strategic planning for both
21 product lines. In July 2020 I was promoted to Vice President of Shipley Choice and
22 Customer Experience. I was then promoted to Vice President, Marketing, of Shipley

1 Group LP, which is the immediate parent company of Shipley Choice LLC. My resume is
2 attached as **Appendix A**.

3

4 **Q. Have you participated previously in regulatory cases?**

5 A. Yes. I was a witness in Columbia Gas of Pennsylvania’s rate case at Docket Nos. R-2018-
6 2647577.

7

8 **Q. What is the subject of your testimony in this proceeding?**

9 A. In my testimony, I address two issues raised by the testimony submitted by Metropolitan
10 Edison Company, Pennsylvania Electric Company, Pennsylvania Power Company, and
11 West Penn Power Company (the Companies or Joint Petitioners). The first subject of
12 concern is the Companies’ Customer Referral Program (“CRP”). I have specific concerns
13 about changes that have been proposed in this case that will negatively impact a program
14 that historically had been successful in providing customers with the opportunity to benefit
15 from an annual fixed price product priced at 7% below the PTC at the time of enrollment.
16 I also have concerns about changes made after the Companies’ last Default Service
17 Proceeding that have had a substantial negative impact on enrollment levels.

18

19 **Q. What about the second area of concern?**

20 A. My second area of concern is the Companies’ proposal to acquire 20 MW of solar energy
21 for use in serving default service customers and for the solar photovoltaic alternative
22 energy credits (“SPAEC”) that would be used to offset the Companies’ *Alternative Energy*
23 *Portfolio Standards Act*, 73 P.S. §§ 1648.1, *et seq.*(“AEPSA”), requirements. My concern

1 is the uncertainty regarding the Companies recovery of the costs associated with the
2 procurement, energy and/or SPAECs. In response to a discovery question regarding the
3 cost elements the Companies presently recover in default service rates, the Companies
4 indicate that the costs of “solar requirements for Met-Ed, Penelec, and Penn Power . . . are
5 recovered through the Solar Photovoltaic Requirements Charge Rider on a non-bypassable
6 basis.” (ME/PN/PP/WP Response to Shipley Energy Interrogatory Set I, No. 8, Attached
7 hereto as **Exhibit LTG-1**). In a more recent response, the Companies confirm this
8 arrangement (*See* ME/PN/PP/WP Response to Shipley Energy Interrogatory Set II, No. 6,
9 Attached hereto as **Exhibit LGT-2**). However, in another response, the Companies
10 confirm that costs associated with the “long-term solar procurement will be recovered in
11 the residential Price to Compare Default Service Rider rate.” (*See* ME/PN/PP/WP
12 Response to Shipley Energy Interrogatory Set II, No. 7, Attached hereto as **Exhibit LGT-**
13 **3**). In testimony, the Companies admitted that they do not presently recover costs
14 associated with their separate procurement of SPAECs through the PTC but rather through
15 the Solar Photovoltaic Requirements Charge Riders of each Company, except for WPP.
16 (Met-Ed/Penelec/Penn Power/West Penn Statement No. 5, p. 12). Ms. Larkin’s testimony
17 goes on to state plainly that the Company intends to continue to recover the cost of legacy
18 solar energy contracts through 2024, via this rider that will not change. However, Ms.
19 Larkin says nothing about how the costs of the new procurement will be recovered, in the
20 overlapping period, when the energy and SPAECs acquired in the new long-term
21 acquisition will not benefit EGS customers. To further complicate matters, the Companies
22 intend to allocate up to 32% of the required SPAECs to default service suppliers. The costs
23 of solar energy and the associated SPAECs are costs directly related to energy supply.

1 Recovering the substantial costs associated with acquiring and retiring SPAECs to comply
 2 with AEPSA, through a rider and not through the PTC, would make default service, when
 3 compared with EGS offers, look lower (i.e., more attractive), because it will not be an
 4 apples-to-apples comparison. Not recovering all AEPSA compliance costs entirely
 5 through the PTC, once the legacy contracts expire, will harm suppliers and distort the utility
 6 price of energy. I am concerned that there is not a clear indication in the proposed tariffs
 7 to address the overlap of these procurements.

8
 9 **II. CUSTOMER REFERRAL PROGRAM**

10 **Q. What are your specific concerns about the CRP?**

11 A. I have three. First, the Companies have proposed that suppliers be required to opt-in to the
 12 CRP program and be required to hold offers open for six months at a time. This six-month
 13 duration appears to be a direct result of the Companies' proposal to switch to a six-month
 14 PTC and reconciliation period. This change is problematic for reasons I discuss below.
 15 Second, I am concerned that the Companies have thus far not created a system that allows
 16 customers to enroll in the CRP when they commence service with the Companies online,
 17 even though the Companies now enroll a significant number of customers for distribution
 18 service online. The Companies' reason for maintaining this disparity -- enrolling
 19 customers online but not providing an opportunity to enroll in the CRP online -- is that they
 20 do not believe they are required to do so. (See ME/PN/PP/WP Response to Shiplely Energy
 21 Interrogatory Set 1, No. 4, Attached hereto as **Exhibit LGT-4**). I believe it is
 22 discriminatory to not allow customers to enroll in CRP online if they are allowed to enroll
 23 in default service online, which presumably they are, or even if they can sign up only for

1 distribution service online. The Companies should be required to modify their systems to
 2 allow for online enrollment in CRP. Third, and finally, in 2017, in response to a settlement
 3 in the Companies' most recent prior DSP proceeding, changes were made to the CRP
 4 program scripts that appear to have resulted in a substantial drop in the number of
 5 enrollments into the CRP program that persists to this day. (See ME/PN/PP/WP Response
 6 to Shibley Interrogatory Set I, No. 3 Attachment A, Attached hereto as **Exhibit LGT-5**).
 7 In response to discovery requests, the Companies confirmed that the script modifications
 8 were the only changes made to the CRP. (ME/PN/PP/WP Response to Shibley Energy
 9 Interrogatory Set II, No. 3, Attached hereto as **Exhibit LGT-6**). It is Shibley's position that
 10 we must examine and revise those changes to make them less detrimental to the CRP
 11 program.

12
 13 **Q. Please explain the details of the CRP program.**

14 A. Through the CRP, the Companies have provided their customers with an opportunity to
 15 transfer their electric generation supply to competitive suppliers such as Shibley when
 16 those customers contact the Companies for a variety of reasons. These reasons include
 17 billing inquiries, calls about customer choice, during move-in calls and calls regarding
 18 transfers of service. (See ME/PN/PP/WP Response to Shibley Energy Interrogatory Set I,
 19 No. 5, Attached hereto as **Exhibit LGT-7**). In general, when a customer contacts the
 20 company for one of the stated reasons, that customer is asked if they want to be referred to
 21 another representative to hear about a program that could save them money. If the customer
 22 agrees, the call is transferred to a contractor who then explains the referral program and
 23 allows a customer to enroll.

1 **Q. What are the requirements for suppliers that wish to participate in the program?**

2 A. To participate in the CRP, suppliers are required to provide a fixed price to customers for
3 a full year that is 7% less than the Price to Compare (“PTC”) that is in effect when the
4 customer enrolls. The Companies’ current CRP requires that suppliers, such as Shipley,
5 opt-in to the program for at least a 3-month period during which any particular PTC is in
6 effect. The supplier is required to stay in the program for that 3-month period.

7
8 **Q. Does the current 3-month opt-in requirement cause problems for suppliers?**

9 A. Opting-in for three months at a time is not ideal. There is inherent risk associated with
10 opting-in for a 3-month window because of market movement. The risk lies in not knowing
11 how many customers you may receive from the program in a given week or month, thus
12 making it impossible to hedge precisely. While the market is ever changing and fluctuating
13 based on weather, natural gas prices, world events, etc., a supplier must commit to a price
14 without being able to hedge 100% of the customer load. It’s nearly impossible to guess
15 how many customers you could receive in the program, as you never know in advance how
16 many suppliers are participating or how many customers are opting in. For instance, the
17 number of enrollments in the CRP jumped 157% in one month from April 2019 to May
18 2019, while the same time period the year prior saw only a 20% increase (using data from
19 **Exhibit LGT-5**). As a supplier, there is no sound way to predict those movements. You
20 will either hedge long and have to sell back hedges potentially at a loss, or you have a short
21 position and might have to buy more expensive hedges. Suppliers are committing to a 12-
22 month fixed price product, not a 3-month fixed price that would match the price to compare
23 length. We are already taking on additional risk by not knowing how many customers

1 we'll receive. But the longer the period of time we must opt in and hold it open without
2 the ability to opt back out in the same time frame, the greater the risk of market changes
3 during the opt in period and the greater the costs.

4
5 **Q. What is the problem with the Companies' proposal?**

6 A. In this proceeding the Companies have proposed extending the current 3-month opt-in
7 period to 6-months, seemingly to coincide with the 6-month price to compare also proposed
8 in this proceeding. However, it seems they are trying to link two concepts that are not
9 dependent upon one another. Rather than forcing a supplier to commit to an even longer,
10 riskier time frame of 6 months to accept customers, why not let the supplier opt in on a
11 monthly basis? This is currently done by another Pennsylvanian utility, PECO. While the
12 customer gets the same 12-month contract with the 7% discount, it allows the suppliers to
13 better manage risk since we can opt out after a month if needed due to market conditions
14 changing. It is possible that more suppliers may be willing to participate if they can hold
15 a CRP offer open for shorter durations, like the 30-days at a time requirement for PECO's
16 referral program. The price to compare is not impacted by suppliers opting in and out of
17 the program.

18
19 **Q. What change do you propose to address this concern about a longer opt-in period?**

20 A. I propose that the Companies' CRPs be modified to allow suppliers to opt-in and out of the
21 program each month. For example, if a supplier were to participate in the CRP in March
22 and opted out for April, they would not be able to opt-in again until May. The ability to

1 Opt-in or out would probably need a reasonable time frame requirement as well, depending
2 on the Companies' capabilities.

3
4 **Q. Are there any benefits to a shorter opt-in/-out period versus a longer time frame that**
5 **was proposed in this case?**

6
7 A. Yes. The primary benefit is the reduction of substantial risk that would be unnecessarily
8 imposed on EGS with a six-month opt-in/-out requirement. If the risk of participation is
9 lowered, it is possible that more suppliers may choose to participate in the program, thus
10 offering more month-over-month stability to the program. I am concerned that with a
11 longer opt-in period, the number of participating suppliers will dwindle, providing a
12 justification for ending the program and thus eliminate a real opportunity for customers to
13 enjoy guaranteed savings.

14
15 **Q. Do you have additional concerns with the CRP?**

16 A. Yes. Based on a response to our discovery, the Companies are now enrolling anywhere
17 from 6 to 10% of new residential customers online on a monthly basis. (*See*
18 *ME/PN/PP/WP Response to Shipley Energy Interrogatory Set I, No. 1, Attached hereto as*
19 **Exhibit LGT-8**). What is important to note is that the number of online enrollments is
20 increasing as a percentage of all enrollments over time. In 2017, the number of annual
21 online enrollments was 2,410. The number has increased almost 9 times that of just 5 years
22 ago to be 21,063. As more and more consumers are opting to initiate electricity service
23 online, the number should increase year over year moving forward. Yet, based on another
24 discovery response, it is clear that new customers are not permitted to enroll in the CRP
25 online. (*See Exhibit LGT-4*). This means that a growing number of customers will be

1 deprived of the opportunity to enroll in CRP simply because they enrolled online and did
2 not speak to a live operator.

3
4 **Q. Is there a reason that the Companies do not provide equivalent enrollment**
5 **opportunities for online enrollees versus call-ins?**

6
7 A. The Company's answer for why they don't allow for online CRP enrollment is that the
8 Commission never told them they should. In this case, I recommend that the Commission
9 make the strong suggestion that programs such as CRP that are available to customers who
10 call the customer service number must also be available to those who engage the
11 Companies online. To do otherwise potentially penalizes, i.e., discriminates against,
12 customers who engage the company online, when the cost of doing so is likely to be
13 significantly less than telephone enrollments.¹

14
15 **Q. Are there any other concerns about the CRP?**

16 A. Yes. The Companies modified the CRP program in the spring of 2017 (Exhibit LGT-6) in
17 a manner that has dramatically reduced the number of customers enrolling in the program.
18 (See Exhibit LGT-5). These changes were to the scripts and changed the wording to make
19 enrolling in the programs appear to be perilous, when indeed it is a program that provides
20 customers with a 1-year fixed price at a discount from the PTC.

21
22

¹ See ME/PN/PP/WP Response to Shipley Energy Set I, No. 2 Attached as **Exhibit LGT-9**. The Companies state that a cost per web transaction is "not available" and that the average cost of a telephone enrollment is \$6.60 per call. It is almost certain that a "live" transaction will cost more than a web enrollment.

1 **Q. How are these changes negatively impacting the CRP program?**

2 A. Enrollments dropped off significantly almost immediately after the scripts were changed,
3 and across all four Companies.

4

5 **Q. What is your recommendation to address the negative outcome of these changes?**

6 A. I recommend that we form a working group to revisit the changes to the scripts to address
7 the need to inform customers but to not intentionally discourage participation in the CRP,
8 which is what appears to be happening now.

9

10 **III. SOLAR ENERGY AND SPAEC COST RECOVERY**

11 **Q. Explain the basis for your concerns about the Companies' proposal to Acquire solar**
12 **energy and SPAECs.**

13

14 A. The Companies have proposed to engage in an RFP process to acquire up to 20 MW of
15 solar energy in the market. (Met-Ed/Penelec/Penn Power/West Penn Statement No. 2,
16 21:10-23:22). The intention is to also acquire the SPAECs that are produced by the
17 facility(s) with which they contract. I have no issue with the Companies acquiring SPAECs
18 and I have no problem with them acquiring solar energy. My concern is how they recover
19 the costs of the purchases.

20

21 **Q. Do the Companies purchase solar energy and SPAECs currently?**

22 A. Yes, Met Ed, Penelec and Penn Power all have so-called "legacy" contracts to purchase
23 SPAECs and those contracts are set to expire at the end of 2024, before the expiration of
24 the currently proposed DSP plan. The Companies use the SPAECs acquired as part of
25 those contracts to satisfy the AEPSA requirements for all customers on the system and

1 recover the costs from all customers via a non-bypassable charge – The Solar Photovoltaic
2 Requirements Charge Rider. In their testimony in this case the Companies have not
3 proposed to modify those Riders, nor have they addressed what happens to those riders
4 after the legacy contracts expire. It also is not clear if charges from the proposed
5 acquisition will begin to be recovered prior to the expiration of the existing contracts.
6

7 **Q. Why does it matter how the Companies recover the costs of solar energy and**
8 **SPAECs?**

9
10 A. It matters because if the Companies do not recover the costs of the new contracts through
11 the default service rate, and instead were to recover the costs in the rider that applies to all
12 customers, shopping customers would be subsidizing default service. Even if the riders
13 were modified at some point in the future to only apply to default service customers, and
14 the charges were recovered through the riders, which is what it appears the Companies
15 could do, it would still violate the principle that all default service costs be recovered
16 through the default service rate. The reason it matters is that removing costs from the
17 default service rate, to be recovered elsewhere, makes the default service rate lower than it
18 should be and distorts the price to compare by deceiving customers into thinking that
19 default service is a better value proposition than taking service from a competitive supplier,
20 like Shipley. It also would violate 52 Pa. Code § 54.187(b), which requires that all costs
21 of default service be recovered through the default service rate.
22

23 **Q. What is the solution to this concern?**

24 A. The solution is to ensure that all costs related to default service be recovered in the default
25 service rate. In this instance that means a requirement that all the costs associated with

1 energy provided to default service customers, be it solar, or from any other source, be
2 recovered only from default service customers. It also means that all costs of AEPSA
3 compliance (except for the legacy contracts that will expire in 2024) be recovered only
4 from default service customers, because EGSs are required to acquire and retire the same
5 percentages of alternative energy credits for the retail load they serve. The costs of the
6 legacy contracts can continue to be recovered through Solar Photovoltaic Requirements
7 Charge Rider, but the Riders must terminate once those contracts expire. If there is any
8 overlap, it must be clear that costs of the new procurement are not recovered through the
9 Riders.

10

11 **Q. Is there anything further you wish to add?**

12 A. Not at this time and this concludes my direct testimony.

13

14

15

16

17

List of Exhibits:

- | | |
|-----------------|---|
| Exhibit LTG – 1 | FirstEnergy response to Shipley Set I, No. 8 |
| Exhibit LTG – 2 | FirstEnergy response to Shipley Set II, No. 6 |
| Exhibit LTG – 3 | FirstEnergy response to Shipley Set II, No. 7 |
| Exhibit LTG – 4 | FirstEnergy response to Shipley Set I, No. 4 |
| Exhibit LTG – 5 | FirstEnergy response to Shipley Set I, No. 3 & Attachment A |
| Exhibit LTG – 6 | FirstEnergy response to Shipley Set II, No. 3 |
| Exhibit LTG – 7 | FirstEnergy response to Shipley Set I, No. 5 |
| Exhibit LTG - 8 | FirstEnergy response to Shipley Set I, No. 1 |
| Exhibit LTG – 9 | FirstEnergy response to Shipley Set I, No. 2 |

APPENDIX A

Laura Greenholt-Tasto

415 Norway Street, York, PA 17403 • (717) 771-1858 • lgreenholt@shipleyenergy.com

Experience

Shipley Energy, York, PA

Vice President of Marketing

2021-present

- Oversee all B2B and B2C marketing for the organization covering 12 brands and 6 product lines
- Responsible for branding and communication strategy for multiple acquisitions
- Oversee all digital, print, out-of-home, search engine optimization, video, email, and social media marketing and advertising
- Collaborate with sales teams to implement content strategies, lead generation and tracking, analytics, customer correspondence, and sales funnels
- Implement new website and fresh product offers
- Report to President and COO, member of Impact Leadership Team, and board member of Shipley Energy PAC

Vice President of Customer Experience and Shipley Choice

2020-2020

- Utilize design thinking and user testing to improve the customer experience, increase retention, and increase sales
- Assemble a CX team to implement projects such as in-house rewards system, pricing interface for customer care, commercial e-signatures, texting, and marketing integrations
- Implement a feedback system to capture reviews, net promoter scores, and customer satisfaction surveys
- Lead implementation of the 1st electricity acquisition at Shipley Energy

General Manager of Choice Operations

2017-2020

- Oversee all business functions of both natural gas and electricity product lines
- Manage our largest natural gas commercial account
- Forecast target volumes and margins and consistently exceed annual budget goals
- Work with IT, operations, and sales teams to implement in-house pricing and contract management software solution for B2B to increase productivity, accuracy, and speed of pricing, contracting, and customer billing
- Intervene and testify in 1307(f) filings and rate cases and PUC en banc hearing

Manager of Choice Operations

2014-2017

- Research and implement demand forecasting software, reducing costs for electricity product line by eliminating reliance on outside consultant
- Negotiate ISDAs, NAESBs, broker agreements, and commercial customer contracts
- Work with marketing to strategically acquire residential customers
- Research and implement new billing system to increase efficiency and handle expansion from 5 utilities to 14 utilities
- Assemble supply team to eliminate natural gas asset management agreement, reducing costs by \$260,000/year
- Institute wholesale natural gas area of business

Manager of Natural Gas Operations

2012-2014

- Oversee customer acquisition, marketing campaigns, retention, pricing, contracts, purchasing, supply, billing, and collections
- Increase number of trading counterparties and negotiate asset management agreement

Energy Supply Analyst

2009-2012

- Schedule and trade physical natural gas on interstate pipelines and utilities

- Develop scheduling spreadsheets and customer pricing models
- Field residential customer service and sales calls

Hess Corporation, Woodbridge, NJ

Natural Gas Logistics Analyst II

2007-2009

- Forecast and schedule natural gas to commercial and industrial customers while lowering costs and minimizing penalties
- Develop and implement a training program for new hires

Volunteer

Allocations Panel Volunteer, United Way of York County

2018-present

Volunteer, Special Olympics Adams County

2014-2016

Volunteer Coordinator, Special Olympics Adams County

2015-2016

Light Tech Desk Operator, Grace UCC

2015-2020

Education

University of Delaware, Newark, DE

B.S. in Operations Management, B.S. in Marketing, Minor in Economics

EXHIBIT LGT-1

**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-2021-3030012, P-2021-3030013, P-2021-3030014, and P-2021-3030021**

SHIPLEY CHOICE, LLC D/B/A SHIPLEY ENERGY Set I, No. 8

“Identify each and every cost or expense element that is recovered, in whole or in part, in the default service rate (also known as the “Price to Compare” or “PTC”). If a cost/expense element is not recovered in full, explain what portion of the cost is recovered in the default service rate and explain why it is recovered in that manner.”

RESPONSE:

The following costs are recovered in whole in default service rates through the Companies’ Price to Compare Default Service Rate (“PTC”) Riders and the Hourly Pricing Default Service (“HP”) Riders:

- Wholesale energy, capacity, ancillary, applicable RTO or ISO administrative and transmission costs, except for Non-Market Based Services Transmission Charges (“NMB Charges”). For a list of those NMB charges that are recovered through the Companies’ Default Service Support (“DSS”) Riders on a non-bypassable basis, see Met-Ed/Penelec/Penn Power/West Penn Statement No. 5, page 11, footnote 7. NMB Charges are provided by the Companies to shopping and non-shopping customers. Default service suppliers under contract with the Companies for wholesale power are responsible for any costs they incur for supply management (e.g., hedging, risk management and similar activities), as well as any congestion and congestion management costs incurred to meet their default supply responsibilities. The Companies therefore expect default service suppliers to include such costs in their wholesale power contract prices, which are recovered through the Companies’ PTC and HP Riders. See also Met-Ed/Penelec/Penn Power/West Penn Statement No. 3, pages 4-5 for a detailed description of the costs included in the Companies’ payments to default service suppliers under their Supply Master Agreements.
- Administrative and general costs directly attributable to default service, such as the costs to conduct procurements, a default service independent evaluator to oversee the procurement process, as well as regulatory filing and litigation costs associated with the Companies’ default service programs. Costs related to billing, collections, education, tariff filings, working capital, information system and associated administrative and general expenses are incurred to serve all distribution customers and are therefore collected in base rates. However, default service-related uncollectible accounts expense for large commercial and industrial customers is recovered through the Companies’ HP Riders.

- Taxes applicable to default service, including Pennsylvania's 5.9% Gross Receipts Tax, imposed on gross sales of electric energy within Pennsylvania.
- Costs for compliance with Pennsylvania's Alternative Energy Portfolio Standard ("AEPS") Act for the Companies' default service load, except for solar requirements for Met-Ed, Penelec, and Penn Power, which are collected through the Solar Photovoltaic Requirements Charge Riders on a non-bypassable basis.
- The cost of compensating customers taking service under a Company's net metering rider for excess generation in accordance with the AEPS Act.

EXHIBIT LGT-2

**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-2021-3030012, P-2021-3030013, P-2021-3030014, and P-2021-3030021**

SHIPLEY CHOICE, LLC D/B/A SHIPLEY ENERGY Set II, No. 6

“Are the costs of SPAEC’s presently recovered through the default service rate? If not, explain why not.”

RESPONSE:

The costs of SPAECs are presently recovered from all customers through Met-Ed, Penelec, and Penn Power’s Solar Photovoltaic Requirements Charge (“SPVRC”) Riders on a non-bypassable basis because the SPAECs are allocated to both Default Service suppliers and retail suppliers. West Penn’s SPAEC costs are recovered in the Price to Compare Default Service Rider rates.

EXHIBIT LGT-3

**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-2021-3030012, P-2021-3030013, P-2021-3030014, and P-2021-3030021**

SHIPLEY CHOICE, LLC D/B/A SHIPLEY ENERGY Set II, No. 7

“With regard to the Companies’ proposed long term solar procurement, will all of the costs associated with that procurement be recovered in the default service rate? If the answer is anything other than an unequivocal yes, explain in detail how all costs associated with the SPAEC procurement will be recovered.”

RESPONSE:

Yes. The costs associated with the long-term solar procurement will be recovered in the residential Price to Compare Default Service Rider rate.

EXHIBIT LGT-4

**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-2021-3030012, P-2021-3030013, P-2021-3030014, and P-2021-3030021**

SHIPLEY CHOICE, LLC D/B/A SHIPLEY ENERGY Set I, No. 4

“Does First Energy currently allow customers to enroll in the Customer Referral Program Online? If not, why not?”

RESPONSE:

No. The Companies’ current Customer Referral Programs have evolved over the course of their last four default service proceedings and are consistent with the parameters approved by the Commission in those proceedings. Those parameters do not require the Companies to offer self-service web enrollment for the CRP.

EXHIBIT LGT-5

**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-2021-3030012, P-2021-3030013, P-2021-3030014, and P-2021-3030021**

SHIPLEY CHOICE, LLC D/B/A SHIPLEY ENERGY Set I, No. 3

“Provide a schedule, in native format, that shows for each day of the past five years, the number of customers that were enrolled in each Company’s Customer Referral Program.”

RESPONSE:

By way of email exchange that occurred on January 27, 2022 between counsel for Shipley and the Companies, it was agreed that the request would be revised to provide the requested data on a monthly, rather than daily, basis for the five-year period.

See ME/PN/PP/WP Response to OCA Interrogatory Set I, No. 10 Attachment C for the number of customers that were enrolled in each Company’s Customer Referral Program monthly for the period June 2019 – December 2021.

See ME/PN/PP/WP Response to SHIPLEY ENERGY Interrogatory Set 1, No. 3 Attachment A for the number of customers that were enrolled in each Company’s Customer Referral Program monthly for the period January 2017– May 2019.

ME Customer Referral Program Information 2017

	Jan-17	Feb-17	Mar-17	Apr-17	May-17	Jun-17	Jul-17	Aug-17	Sep-17	Oct-17	Nov-17	Dec-17
# Residential Enrollments	2,000	1,918	2,556	2,068	2,338	619	286	287	272	287	219	232
# Small Comm. Enrollments	22	22	24	19	23	5	3	6	1	2	2	4

PN Customer Referral Program Information 2017

	Jan-17	Feb-17	Mar-17	Apr-17	May-17	Jun-17	Jul-17	Aug-17	Sep-17	Oct-17	Nov-17	Dec-17
# Residential Enrollments	2,056	1,880	2,406	2,174	2,667	618	224	302	234	232	173	135
# Small Comm. Enrollments	22	17	21	13	29	6	2	2	2	5	5	1

PP Customer Referral Program Information 2017

	Jan-17	Feb-17	Mar-17	Apr-17	May-17	Jun-17	Jul-17	Aug-17	Sep-17	Oct-17	Nov-17	Dec-17
# Residential Enrollments	514	466	592	584	723	227	80	82	64	77	53	41
# Small Comm. Enrollments	8	5	10	9	9	1	2	0	1	1	0	1

WP Customer Referral Program Information 2017

	Jan-17	Feb-17	Mar-17	Apr-17	May-17	Jun-17	Jul-17	Aug-17	Sep-17	Oct-17	Nov-17	Dec-17
# Residential Enrollments	1,993	1,960	2,292	2,218	2,743	728	241	452	287	240	170	132
# Small Comm. Enrollments	26	29	22	15	21	6	13	21	2	3	8	3

ME Customer Referral Program Information 2018

	Jan-18	Feb-18	Mar-18	Apr-18	May-18	Jun-18	Jul-18	Aug-18	Sep-18	Oct-18	Nov-18	Dec-18
# Residential Enrollments	286	223	240	207	248	225	262	263	192	185	144	138
# Small Comm. Enrollments	2	6	9	2	5	3	6	5	3	1	0	0

PN Customer Referral Program Information 2018

	Jan-18	Feb-18	Mar-18	Apr-18	May-18	Jun-18	Jul-18	Aug-18	Sep-18	Oct-18	Nov-18	Dec-18
# Residential Enrollments	175	157	167	160	179	192	188	231	146	168	112	80
# Small Comm. Enrollments	2	1	5	6	4	4	0	0	1	1	0	0

PP Customer Referral Program Information 2018

	Jan-18	Feb-18	Mar-18	Apr-18	May-18	Jun-18	Jul-18	Aug-18	Sep-18	Oct-18	Nov-18	Dec-18
# Residential Enrollments	50	44	55	64	54	61	73	67	43	40	25	19
# Small Comm. Enrollments	0	0	0	0	3	3	0	2	0	0	0	0

WP Customer Referral Program Information 2018

	Jan-18	Feb-18	Mar-18	Apr-18	May-18	Jun-18	Jul-18	Aug-18	Sep-18	Oct-18	Nov-18	Dec-18
# Residential Enrollments	173	171	215	198	200	203	204	320	202	148	128	75
# Small Comm. Enrollments	1	4	5	4	3	4	3	1	0	1	0	0

ME Customer Referral Program Information 2019

	Jan-19	Feb-19	Mar-19	Apr-19	May-19
# Residential Enrollments	106	125	152	313	804
# Small Comm. Enrollments	0	2	1	1	0

PN Customer Referral Program Information 2019

	Jan-19	Feb-19	Mar-19	Apr-19	May-19
# Residential Enrollments	83	78	88	256	738
# Small Comm. Enrollments	0	0	0	0	1

PP Customer Referral Program Information 2019

	Jan-19	Feb-19	Mar-19	Apr-19	May-19
# Residential Enrollments	27	24	17	83	198
# Small Comm. Enrollments	0	0	0	0	0

WP Customer Referral Program Information 2019

	Jan-19	Feb-19	Mar-19	Apr-19	May-19
# Residential Enrollments	93	109	115	256	812
# Small Comm. Enrollments	0	0	0	0	0

EXHIBIT LGT-6

**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-2021-3030012, P-2021-3030013, P-2021-3030014, and P-2021-3030021**

SHIPLEY CHOICE, LLC D/B/A SHIPLEY ENERGY Set II, No. 3

“Identify and describe any and all changes the Companies made to the Customer Referral Program (“CRP”), including script changes or other program changes that became effective between April 2017 and June 2017. Provide the implementation schedule and describe the intended purpose of any change in the CRP, the impetus for such change, and any analysis of the potential impacts of such change(s) made before or after the change(s). Provide copies of any and all studies or analysis made, in native format, prior to the changes or after the changes regarding the expected or actual impacts of any changes.”

RESPONSE:

See ME/PN/PP/WP Response to RESA-NRG Interrogatory Set 1, No. 01 Attachment A, for the Customer Referral Program (“CRP”) scripting changes made in May 2017 in accordance with the Commission-approved settlement of the Companies’ fourth default service proceedings at Docket Nos. P-2015-2511333, P-2015-2511351, P-2015-2511355 and P-2015-2511356 (“DSP IV Settlement”). There were no other changes to the Companies’ CRP scripts that became effective between April 2017 and June 2017. The Companies have not performed the analysis requested in this question regarding the potential impact of CRP script changes produced by the DSP IV Settlement.

EXHIBIT LGT-7

**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-2021-3030012, P-2021-3030013, P-2021-3030014, and P-2021-3030021**

SHIPLEY CHOICE, LLC D/B/A SHIPLEY ENERGY Set I, No. 5

“Does First Energy offer a discounted rate, such as that provided through the Customer Referral Program, to customers who contact the Companies for reasons other than just setting up new service? For example: a) if a customer calls about high bill complaint; b) a general billing question; c) to set up automatic billing, etc.”

RESPONSE:

Yes. The following call types trigger an offer of the Customer Referral Program to the Companies' residential and small commercial customers: a billing inquiry, customer choice calls, or during a move-in, for new customers or existing customer for transfers of service.

EXHIBIT LGT-8

**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-2021-3030012, P-2021-3030013, P-2021-3030014, and P-2021-3030021**

SHIPLEY CHOICE, LLC D/B/A SHIPLEY ENERGY Set I, No. 1

“How many customers, by month, has each Company enrolled in residential service for each of the past five years? For the customers reported, for each month quantify the number of customers by the method used to enroll them, using categories such as: telephone, online, and other.”

RESPONSE:

See ME/PN/PP/WP Response to SHIPLEY ENERGY Interrogatory Set 1, No. 1 Attachment A which shows all residential service enrollments, regardless of shopping status, from 2017 to 2021, including a breakdown of enrollments by web process, telephone during a contact with a customer service representative, and manual enrollment by an agent following a request for service on the Companies' websites.

Residential Service Applications Completed - 2017						
	Month	PN	ME	PP	WP	Total
January	Total	5394	5942	1454	5965	18755
	Manual Agent	127	260	45	188	620
	Web process	26	44	15	38	123
	Live Agents	5241	5638	1394	5739	18012
February	Total	5375	6224	1486	5989	19074
	Manual Agent	176	271	56	176	679
	Web process	57	42	13	57	169
	Live Agents	5142	5911	1417	5756	18226
March	Total	7048	8163	1905	7503	24619
	Manual Agent	162	305	52	221	740
	Web process	39	55	19	49	162
	Live Agents	6847	7803	1834	7233	23717
April	Total	6065	7099	1771	6781	21716
	Manual Agent	168	299	67	227	761
	Web process	43	61	19	72	195
	Live Agents	5854	6739	1685	6482	20760
May	Total	8700	7869	2156	8408	27133
	Manual Agent	232	373	90	317	1012
	Web process	45	56	21	87	209
	Live Agents	8423	7440	2045	8004	25912
June	Total	9058	8923	2536	9257	29774
	Manual Agent	230	399	80	330	1039
	Web process	66	93	17	93	269
	Live Agents	8762	8431	2439	8834	28466
July	Total	8056	7827	2065	8964	26912
	Manual Agent	233	370	77	514	1194
	Web process	65	72	20	132	289
	Live Agents	7758	7385	1968	8318	25429
August	Total	10292	8920	2365	15231	36808
	Manual Agent	351	432	93	684	1560
	Web process	64	90	29	159	342
	Live Agents	9877	8398	2243	14388	34906
September	Total	8150	8443	2174	8826	27593
	Manual Agent	226	364	81	335	1006
	Web process	47	60	21	52	180
	Live Agents	7877	8019	2072	8439	26407
October	Total	7954	8139	2158	8181	26432
	Manual Agent	181	340	60	260	841
	Web process	32	55	15	48	150
	Live Agents	7741	7744	2083	7873	25441
November	Total	7453	7939	1969	7671	25032
	Manual Agent	207	320	51	269	847
	Web process	50	46	16	74	186
	Live Agents	7196	7573	1902	7328	23999
December	Total	6373	7329	1929	7052	22683
	Manual Agent	148	264	66	250	728
	Web process	37	41	14	44	136
	Live Agents	6188	7024	1849	6758	21819
2017	Total	89918	92817	23968	99828	306531
	Manual Agent	2441	3997	818	3771	11027
	Web process	571	715	219	905	2410
	Live Agents	86906	88105	22931	95152	293094

Residential Service Applications Completed - 2018						
	Month	PN	ME	PP	WP	Total
January	Total	5669	5901	1477	6193	19240
	Manual Agent	172	259	53	216	700
	Web process	27	37	20	57	141
	Live Agents	5470	5605	1404	5920	18399
February	Total	5291	5905	1567	5693	18456
	Manual Agent	142	235	54	199	630
	Web process	34	53	11	46	144
	Live Agents	5115	5617	1502	5448	17682
March	Total	6723	7335	2018	7126	23202
	Manual Agent	172	333	90	279	874
	Web process	390	60	19	66	535
	Live Agents	6161	6942	1909	6781	21793
April	Total	6312	6910	1871	7063	22156
	Manual Agent	221	379	96	303	999
	Web process	40	63	20	74	197
	Live Agents	6051	6468	1755	6686	20960
May	Total	8465	8003	2238	8546	27252
	Manual Agent	289	417	82	403	1191
	Web process	71	77	15	100	263
	Live Agents	8105	7509	2141	8043	25798
June	Total	8804	8729	2335	9336	29204
	Manual Agent	249	446	99	414	1208
	Web process	66	91	29	97	283
	Live Agents	8489	8192	2207	8825	27713
July	Total	8106	8104	2306	9269	27785
	Manual Agent	315	478	105	635	1533
	Web process	73	70	30	175	348
	Live Agents	7718	7556	2171	8459	25904
August	Total	10385	9203	2671	15306	37565
	Manual Agent	346	460	99	681	1586
	Web process	61	84	24	148	317
	Live Agents	9978	8659	2548	14477	35662
September	Total	7370	7252	1975	7936	24533
	Manual Agent	225	347	84	408	1064
	Web process	44	69	14	70	197
	Live Agents	7101	6836	1877	7458	23272
October	Total	8503	8302	2181	8598	27584
	Manual Agent	251	412	86	311	1060
	Web process	48	61	19	81	209
	Live Agents	8204	7829	2076	8206	26315
November	Total	7560	7706	1913	7723	24902
	Manual Agent	220	355	69	263	907
	Web process	51	62	21	84	218
	Live Agents	7289	7289	1823	7376	23777
December	Total	5531	6417	1519	6279	19746
	Manual Agent	36	46	47	58	187
	Web process	168	266	10	230	674
	Live Agents	5327	6105	1462	5991	18885
2018	Total	88719	89767	24071	99068	301625
	Manual Agent	2638	4167	964	4170	11939
	Web process	1073	993	232	1228	3526
	Live Agents	85008	84607	22875	93670	286160

Residential Service Applications Completed - 2019						
	Month	PN	ME	PP	WP	Total
January	Total	5814	6017	1529	6127	19487
	Manual Agent	169	245	68	235	717
	Web process	31	47	9	50	137
	Live Agents	5614	5725	1452	5842	18633
February	Total	5219	5634	1354	5529	17736
	Manual Agent	146	253	50	175	624
	Web process	100	148	37	116	401
	Live Agents	4973	5233	1267	5238	16711
March	Total	6157	6831	1819	6828	21635
	Manual Agent	63	115	28	67	273
	Web process	251	366	105	311	1033
	Live Agents	5843	6350	1686	6450	20329
April	Total	6895	7095	1963	7334	23287
	iWd Agent	267	407	35	331	1040
	Web process	66	128	101	84	379
	Live Agents	6562	6560	1827	6919	21868
May	Total	8855	8118	2154	8772	27899
	Manual Agent	73	142	27	97	339
	Web process	330	461	102	451	1344
	Live Agents	8452	7515	2025	8224	26216
June	Total	7494	7739	2077	7937	25247
	Manual Agent	81	147	35	109	372
	Web process	351	469	143	545	1508
	Live Agents	7062	7123	1899	7283	23367
July	Total	8543	8207	2169	9626	28545
	Manual Agent	92	164	35	165	456
	Web process	390	547	115	799	1851
	Live Agents	8061	7496	2019	8662	26238
August	Total	9777	9028	2464	14740	36009
	Manual Agent	406	551	115	820	1892
	Web process	161	165	34	161	521
	Live Agents	9210	8312	2315	13759	33596
September	Total	7329	7398	1978	7837	24542
	Manual Agent	89	139	29	100	357
	Web process	332	534	97	332	1295
	Live Agents	6908	6725	1852	7405	22890
October	Total	8281	8276	2211	8655	27423
	Manual Agent	78	139	23	105	345
	Web process	322	482	92	417	1313
	Live Agents	7881	7655	2096	8133	25765
November	Total	7291	7668	1940	7796	24695
	Manual Agent	77	156	28	101	362
	Web process	315	461	82	404	1262
	Live Agents	6899	7051	1830	7291	23071
December	Total	6264	6799	1742	6699	21504
	Manual Agent	62	110	22	76	270
	Web process	242	388	84	324	1038
	Live Agents	5960	6301	1636	6299	20196
2019	Total	87919	88810	23400	97880	298009
	Manual Agent	1603	2568	495	2381	7047
	Web process	2891	4196	1001	3994	12082
	Live Agents	83425	82046	21904	91505	278880

Residential Service Applications Completed - 2020						
	Month	PN	ME	PP	WP	Total
January	Total	5826	6276	1600	6400	20102
	Manual Agent	54	94	30	68	246
	Web process	244	367	70	344	1025
	Live Agents	5528	5815	1500	5988	18831
February	Total	5317	6166	1614	5855	18952
	Manual Agent	259	402	23	376	1060
	Web process	79	107	91	74	351
	Live Agents	4979	5657	1500	5405	17541
March	Total	5934	6800	1673	6491	20898
	iWd Agent	49	113	44	81	287
	Web process	254	473	70	405	1202
	Live Agents	5631	6214	1559	6005	19409
April	Total	5075	5087	1440	5379	16981
	Manual Agent	79	97	20	94	290
	Web process	248	366	80	372	1066
	Live Agents	4748	4624	1340	4913	15625
May	Total	5663	5239	1452	5946	18300
	Manual Agent	88	121	30	79	318
	Web process	290	415	82	410	1197
	Live Agents	5285	4703	1340	5457	16785
June	Total	6557	6075	1733	6842	21207
	Manual Agent	70	156	36	135	397
	Web process	323	494	125	535	1477
	Live Agents	6164	5425	1572	6172	19333
July	Total	8080	7770	2308	9953	28111
	Manual Agent	124	206	37	269	636
	Web process	463	620	140	899	2122
	Live Agents	7493	6944	2131	8785	25353
August	Total	7515	7286	2050	12753	29604
	Manual Agent	128	195	62	249	634
	Web process	466	635	149	945	2195
	Live Agents	6921	6456	1839	11559	26775
September	Total	7008	7580	1969	8146	24703
	Manual Agent	122	218	45	151	536
	Web process	438	705	130	623	1896
	Live Agents	6448	6657	1794	7372	22271
October	Total	7504	8001	2104	8337	25946
	Manual Agent	89	160	31	118	398
	Web process	354	589	125	488	1556
	Live Agents	7061	7252	1948	7731	23992
November	Total	5890	6578	1610	6409	20487
	Manual Agent	146	477	45	135	803
	Web process	375	663	109	577	1724
	Live Agents	5369	5438	1456	5697	17960
December	Total	6197	7216	1826	6889	22128
	Manual Agent	100	169	40	129	438
	Web process	283	495	109	453	1340
	Live Agents	5814	6552	1677	6307	20350
2020	Total	76566	80074	21379	89400	267419
	Manual Agent	1308	2408	443	1884	6043
	Web process	3817	5929	1280	6125	17151
	Live Agents	71441	71737	19656	81391	244225

Residential Service Applications Completed - 2021						
	Month	PN	ME	PP	WP	Total
January	Total	5167	5891	1429	5814	18301
	Manual Agent	86	153	34	111	384
	Web process	326	523	104	436	1389
	Live Agents	4755	5215	1291	5267	16528
February	Total	4823	5173	1445	5304	16745
	Manual Agent	60	110	29	99	298
	Web process	251	447	77	350	1125
	Live Agents	4512	4616	1339	4855	15322
March	Total	5870	6645	1684	6678	20877
	Manual Agent	73	141	36	92	342
	Web process	335	508	102	505	1450
	Live Agents	5462	5996	1546	6081	19085
April	Total	6506	6997	1869	7039	22411
	Manual Agent	68	142	35	107	352
	Web process	325	523	132	467	1447
	Live Agents	6113	6332	1702	6465	20612
May	Total	6647	6599	1755	7045	22046
	Manual Agent	95	186	48	145	474
	Web process	354	601	109	592	1656
	Live Agents	6198	5812	1598	6308	19916
June	Total	7389	7696	2056	8205	25346
	Manual Agent	105	198	49	166	518
	Web process	444	692	143	736	2015
	Live Agents	6840	6806	1864	7303	22813
July	Total	7748	7960	2260	10196	28164
	Manual Agent	115	191	54	208	568
	Web process	403	714	148	921	2186
	Live Agents	7230	7055	2058	9067	25410
August	Total	7566	7636	2106	12506	29814
	Manual Agent	221	192	58	221	692
	Web process	480	730	192	1106	2508
	Live Agents	6865	6714	1856	11179	26614
September	Total	6815	6909	1988	7548	23260
	Manual Agent	90	179	41	136	446
	Web process	469	607	174	593	1843
	Live Agents	6256	6123	1773	6819	20971
October	Total	6587	6816	1961	7160	22524
	Manual Agent	95	150	39	106	390
	Web process	407	660	151	586	1804
	Live Agents	6085	6006	1771	6468	20330
November	Total	6482	6767	1848	6947	22044
	Manual Agent	117	251	57	166	591
	Web process	486	768	172	707	2133
	Live Agents	5879	5748	1619	6074	19320
December	Total	5801	7062	1760	6746	21369
	Manual Agent	75	149	30	112	366
	Web process	333	578	107	489	1507
	Live Agents	5393	6335	1623	6145	19496
2021	Total	77401	82151	22161	91188	272901
	Manual Agent	1200	2042	510	1669	5421
	Web process	4613	7351	1611	7488	21063
	Live Agents	71588	72758	20040	82031	246417

EXHIBIT LGT-9

**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-2021-3030012, P-2021-3030013, P-2021-3030014, and P-2021-3030021**

SHIPLEY CHOICE, LLC D/B/A SHIPLEY ENERGY Set I, No. 2

“Identify all costs or expenses, in the aggregate and the average per customer, that are incurred by each of the Companies to enroll a customer, separated by the method used to enroll the customer, i.e., telephonic, internet, other. Break out the costs or expenses by category.”

RESPONSE:

The aggregate and average costs per call for 2021 are provided below for customer enrollment by the Companies’ customer service representatives, either by live customer service representative or manual enrollment by a customer service representative following a request for service on the Companies’ websites. A cost per web transaction is not available.

Total Costs 2021	\$1.5 million
Cost per Call	\$6.60

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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

**REBUTTAL TESTIMONY
OF LAURA GREENHOLT-TASTO
ON BEHALF
OF SHIPLEY CHOICE LLC D/B/A SHIPLEY ENERGY**

Shipley Statement No. 1-R
March 24, 2022

1 **Q. What is your name?**

2 A. Laura Greenholt-Tasto.

3

4 **Q. Are you the same Laura Greenholt-Tasto that provided Direct Testimony in this**
5 **matter?**

6

7 A. Yes.

8

9 **Q. What is the purpose of your Rebuttal Testimony?**

10 A. To respond to certain portions of the Direct Testimonies of Ms. Barbara Alexander on
11 behalf of the Office of Consumer Advocate and Mr. Harry Geller on behalf of CAUSE-
12 PA.

13

14 **Q. Can you please summarize your Rebuttal Testimony?**

15 A. Certainly. I will address the following topics in my Rebuttal:

16 • I disagree with Ms. Alexander, and to a certain extent, Mr. Geller, regarding the
17 suggestion that “selling” the CRP on the basis that it provides customers with a 7%
18 discount off of the price to compare (“PTC”) in effect at the time of the offer, is
19 somehow deceptive.

20 • I disagree with Ms. Alexander and Mr. Geller that the CRP is no longer needed.

21 • I disagree with Ms. Alexander’s suggestion that the service provided after the initial
22 CRP period should be different from service to any other shopping customer, including
23 a different renewal process or regulation of rates.

24 • I disagree with Ms. Alexander’s proposal that the 7% discount be recalculated and re-
25 applied every time the PTC changes.

- 1 • I discuss Mr. Geller’s lament that customers do not appear to be engaged in the market.
- 2 • I generally address Mr. Geller’s discussion regarding the applicability of a study from
- 3 the most recent PPL DSP case.
- 4 • Finally, I briefly discuss Mr. Geller’s suggestion regarding customer call screening for
- 5 CAP eligibility.

6

7 **Q. Explain Ms. Alexander’s position regarding the nature of the 7% discount.**

8 A. Ms. Alexander’s Direct Testimony, beginning on page 7, line 14, addresses her concern

9 that the 7% discount does not apply consistently across all four quarters of the initial term.

10 While she acknowledges that the terms and conditions are required to explain to customers

11 that the 7% discount is a fixed-price contract that is set at 7% off the PTC “in effect” at the

12 time of the contract, she contends that for customers this merely is a “theoretical

13 possibility” and that the terms and conditions do not make clear that a customer could

14 “lose” some or all of their discount over the course of the year, depending on how the

15 market moves.

16

17 **Q. Do you agree with Ms. Alexander that the CRP does not provide sufficient value to**

18 **customers?**

19 A. No, I disagree with Ms. Alexander (OCA St. No. 2, 8:16) on this point. The initial CRP

20 contract is a one-year, fixed price, cancel anytime without penalty, contract. The initial

21 rate is set at a 7% discount off the PTC in effect at the time. As with any fixed-price

22 contract, when you compare it over time with a variable rate, like the PTC, the discount or

23 premium of the fixed rate relative to the variable rate will vary. Ms. Alexander contends

1 that the variance in the discount erodes the value of the program to the point where it no
2 longer provides any benefit to customers. In the recent PPL default service case, the
3 Commission disagreed, finding that the purpose of the program is to “enhance choice and
4 facilitate the development of retail markets through the increased participation of
5 residential and small commercial customers in the retail market.”¹ I note that Ms.
6 Alexander does not contend that customers pay more over the life of the initial term than
7 they would on default service, and her Exhibit BA-2 does not support that conclusion.
8 Therefore, the issue is how much benefit is necessary to consider the program to be a
9 success. From my perspective, if customers receive a stable rate that provides them with a
10 price that is better than what they would pay with the default service provider, with no
11 restrictions on shopping, the customer is receiving value.

12
13 **Q. Do you think customers are being misled?**

14 A. No. The discount is being represented to customers exactly as it is, absent some actual
15 proof (as opposed to Ms. Alexander’s conjecture) I don’t believe that customers are being
16 deceived.

17
18 **Q. Does Mr. Geller share Ms. Alexander’s views?**

19 A. No. Mr. Geller’s concern, as stated in his Direct Testimony (Cause-PA St. No. 1, 48:6),
20 appears to focus on the way the CRP is “sold” to customers, with the emphasis on the
21 savings rather than educating customers how to shop. Mr. Geller’s benchmark for the

¹ *Petition of PPL*, Docket No. P-2020-3019356 (Opinion and Order entered December 17, 2020, slip op. at 93)(PPL) .

1 success of the program is whether customers are better educated about choice by the end
2 of the first year than they were going in. Mr. Geller opines, again without any hard
3 evidence, that customers are not better educated at the end.
4

5 **Q. Do you agree?**

6 A. No. In my view, the important information that customers need to learn is that in a
7 competitive commodity market they should remember to pay attention to their notifications
8 and to make choices. In our experience, substantial numbers of customers will react to the
9 notices, and within a few months before or after the expiration of their contract, will have
10 decided to stay with a renewal offer with us, or will have decided to switch away. The
11 study performed by PPL, to which Mr. Geller refers (Cause-PA St. No. 1, 49:15), supports
12 my position. In the PPL case, the Commission cited to EGS Parties' witness, Mr.
13 Kallaher's, calculation using PPL's data, that within 4 months after the end of their 12-
14 month initial term, 80% of customers had selected a different plan.² That means a
15 significant majority of customers are learning how to participate in the market, whether
16 that choice was a new contract with the same or a new supplier, or going to default service,
17 the customers made affirmative choices.
18

19 **Q. Do Ms. Alexander or Mr. Geller suggest that the CRP has outlived its usefulness?**

20 A. Yes, both of them have suggested as much. (OCA St. No. 2, 3:14, 9:3)(Cause-PA St. No.
21 1, 50:17).
22

² PPL, slip op, p. 101.

1 **Q. Do you agree?**

2 A. No. To the contrary, we need to do more to stimulate the market, including CRP and other
3 changes that might increase shopping. I reviewed the shopping statistics published by the
4 OCA for January 2019³ and compared them to those for January 2022⁴, and the drop-off
5 in residential shopping in three years is dramatic at 19%. There were 1,292,726 residential
6 customers shopping on January 1, 2022, while there were 1,585,502 residential customers
7 shopping on January 1, 2019. I also agree with those who contend that comparing supplier
8 offers to default service rates is not a fair comparison, because, even as admitted in this
9 case, the Companies do not recover all costs associated with providing default service in
10 the default service rate, while suppliers, out of necessity, must do so. Moreover, suppliers
11 are not permitted a dollar-for-dollar recovery of the costs of their services, while the
12 Companies are. While this limited proceeding may not be suited to fixing all the market's
13 problems, it can be an opportunity to continue a beneficial program that is functioning as
14 intended.

15

16 **Q. You stated earlier that Ms. Alexander advocates for changes to the manner in which**
17 **customer contracts are renewed, please explain.**

18

19 A. Ms. Alexander raises concerns (OCA St. No. 2, 9:19) about what she describes as the
20 “negative option” renewal that the Commission has prescribed for CRP programs. That is,
21 at present, if a customer does not take affirmative action at the end of their contract either
22 to select a new offer from a different supplier, sign up for a different offer with the same

³ https://www.oca.pa.gov/wp-content/uploads/ElectricShoppingStatistics_Jan201900248469x97486.pdf

⁴ <https://www.oca.pa.gov/wp-content/uploads/ElecStats-January2022.pdf>

1 supplier, or affirmatively choose to go to default service, the default option is that they
2 revert to a month to month, cancel anytime contract with the same supplier, with the same
3 requirements as any other customer whose contract term has expired. Ms. Alexander
4 contends (without any evidence) that because CRP customers may not know the name of
5 their supplier, having not transacted directly with them during the enrollment process
6 (OCA St. No. 2, 10:4), and despite the fact that the supplier's name is printed on each
7 monthly bill they receive from their EDC, these customers might ignore the required two
8 notices – the same notices that every other customer of a competitive supplier receives at
9 the end of their contract – and end up with an unfavorable roll-over contract. Ms.
10 Alexander recommends that the Commission treat CRP customers differently from other
11 customers and not allow them to roll-over to a month-to-month contract with the supplier
12 who gave them a discounted rate and also paid a \$30 fee to cover the cost of their
13 enrollment. Ms. Alexander makes this recommendation, despite the Commission recently
14 having clearly said that once these customers sign up with suppliers, they are just like every
15 other shopping customer.⁵ There is another reason why I believe Ms. Alexander's
16 approach is inappropriate for a program that is intended to teach customers how to navigate
17 the competitive market. If we take away the need for the customer to take responsibility
18 for their own service, what will they have learned if they end up on default service when
19 they don't respond to the notices? I suspect, they will learn that they do not need to pay
20 attention to their electricity service or take responsibility. This is not suggestion of a "buyer
21 beware" approach, but rather a suggestion that buyers must *be* aware. That said, I do agree
22 with Ms. Alexander and Mr. Geller that customer information and education are important,

⁵ PPL, slip op at p. 97.

1 but the purpose should be to make them more savvy consumers, not scare them into
2 remaining on default service out of fear of entering the market.

3
4 **Q. You said that Ms. Alexander proposed to recalculate the CRP discount every month,**
5 **can you explain her proposal?**

6
7 A. Yes, Ms. Alexander recommends (OCA St. No. 2, 8:16) that because the PTC presently
8 changes every quarter (if the Companies' proposal in this case is approved the PTC will
9 change semi-annually) and the discount offered to customers is 7% off the PTC in effect
10 at the time of the offer, customers will experience a lesser discount than what she claims
11 (without evidence) is expected over the initial one-year term.

12
13 **Q. Do you agree that this is a problem?**

14 A. I believe customers can understand what 7% off the current price to compare means, and I
15 believe they can understand that the PTC changes periodically. There are many examples
16 of this from the world outside utility services, with which customers are familiar. One
17 timely example is gasoline prices. Many households utilize vehicles that rely on gasoline.
18 There are many gasoline suppliers out there, and some are less expensive than others.
19 Prices even vary between grades of gasoline. In general, customers are very aware that you
20 may fill up your tank today, and while it's fixed at the cost you pay today, you could miss
21 out on a cheaper price tomorrow. Or, on the flip side, the price could have gone up
22 tomorrow. Either way, consumers are getting the fuel they need. Who are we to take away
23 their choice to decide what day they buy/lock it in, which supplier they go to, which product
24 they choose, and how much they choose to pay?

25

1 **Q. What has Ms. Alexander proposed as a “solution” to this perceived “problem”?**

2 A. Ms. Alexander has proposed to redefine the program to look like, what she claims (without
3 evidence) the customers expect – a 7% discount off the price to compare every month,
4 regardless of any future change to the PTC. (OCA St. No. 2, 11:2)

5
6 **Q. Do you think her solution is workable?**

7 A. My short answer is No. First, I disagree that customers expect a 7% discount for each and
8 every month, and Ms. Alexander presents no evidence to the contrary. What this means is
9 that in my view, there is no “problem”. Second, offering a seven percent discount applied
10 to the moving target that is the PTC is a vastly different and riskier product than the fixed
11 price contract that suppliers are required to offer presently. Third, and finally, a
12 requirement that suppliers provide the 7% discount was mandated by the Commission to
13 be a fixed rate offering established relative to the PTC in effect at the date the offer is
14 made.⁶ The reason for this is practical. Asking suppliers to pledge to provide a fixed 7%
15 discount over the course of even two price changes, is a very risky and therefore expensive
16 undertaking, which for many suppliers, may keep them from participating in the CRP. This
17 is why it is so critical to allow suppliers to opt in or opt of enrolling new customers in the
18 CRP on a monthly basis, rather than the proposed 6-month basis.

19

20

21

22

⁶ RMI IWP Final Order at pp. 31-32.

1 **Q. You said you agree with Mr. Geller on the need for customer education, please**
2 **explain?**

3
4 A. On page 47 of his Direct, Mr. Geller opines that the success of the CRP program should be
5 judged by the “rate that will be charged and the level of engagement of customers at the
6 conclusion of the 12-month period.” I agree with half of that statement – the second half
7 – because I think the first clause is dependent on the second. Stated differently, I believe
8 the rate that a customer is charged at the end of the CRP, for most suppliers and most
9 customers, will largely be dependent on the customer’s level of engagement. As I noted
10 above, in the most recent PPL DSP case, the Commission cited with approval the testimony
11 that a full 80% of PPL customers had made an affirmative choice about their electricity
12 supplier within 4 months of the expiration of the initial one-year term.⁷ A fairly large
13 percentage, 62% of residential customers, made a choice **before** the expiration of the initial
14 12-month term, most likely prompted by the required notices.⁸ In my estimation, to the
15 extent the PPL data is relatable to the FirstEnergy service territories, the majority of
16 customers participating in CRP are reasonably engaged. This means that customers are
17 prepared to make choices that impact their cost of electricity.

18

19 **Q. Do you have any response to Mr. Geller’s lament that the present scripts appear to**
20 **focus primarily on selling the discounted product and don’t spend enough time**
21 **educating customers about what will happen in approximately 9-10 months when the**
22 **customer receives the first notice?**

23
24 A. I agree that the current scripts could be improved, but I also think that changes to the scripts,
25 including the name change of the program, made in 2017, may have harmed the program.

⁷ PPL, slip op. at p.101.

⁸ *Id.*, Exhibit EGS-1. Attached hereto as Exhibit LGT 10.

1 Prior to the scripting change in May 2017, the program was referred to as the “Standard
2 Offer Program”. The scripting changed in May 2017 to refer to it as the “Customer Referral
3 Program”. This may be a source of confusion. Putting myself in the place of the consumer,
4 when I hear “customer referral”, I automatically believe that I am doing the referring of
5 my friends, family, and neighbors. I’m not thinking that the utility is referring me to a
6 supplier. I believe this may be causing confusion and friction in the customer’s experience
7 while on the phone. I also agree that it is important for CRP customers, like all customers,
8 to know how the market works, i.e., what the rules are. That includes knowing about the
9 required notices; knowing what to expect in those notices, and strategies for reacting to
10 those notices. Some customers will switch away from a product that is economically
11 favorable immediately upon receipt of the first notice, even though they may have several
12 months left on the contract at a beneficial rate. I also think that it is important for customers
13 to understand how a fixed price contract, such as the CRP rate, works when compared to a
14 variable rate such as default service, and vice versa. But sometimes the tone of such
15 “education” can become too cautionary, to the point where it scares customers away from
16 the market. I think it is very likely, based on timing, that the 2017 script changes are
17 responsible for the rather pronounced drop in enrollments across all four companies within
18 a month after the changes were implemented. Also, I believe the timing of education is
19 important. Many customers will not recall a 10 second script about what happens at the
20 end of the contract nine or ten months later when they receive the first end-of-contract
21 notice.

22

23

1 **Q. Do you have any proposals to modify the scripts?**

2 A. While I still believe it best to work together on scripting, I offer up these suggestions as an
3 example of how the scripts could be modified to help customers with understanding how
4 the program works.

5 1) Move In Scripting: The first choice would be to revert to the pre-5/26/2017 version,
6 or alternatively, change it to something like, “With your permission, I will transfer
7 you to our vendor so they can share information on shopping and offer you potential
8 rate savings opportunity on your electricity supply.”

9 2) Vendor Scripting: “In Pennsylvania, you have a choice of who supplies your
10 electricity. The current price that you’ll pay with [OpCo] is known as the price to
11 compare. It is currently [x.xx cents per kwh], but can change quarterly [semi-
12 annually]. If you join our Customer Referral Program, you will receive a fixed rate
13 provided by a licensed supplier that is 7% lower than the today’s price to compare.⁹
14 The Customer Referral Program price is [x.xx cents per kwh]. The Price to
15 Compare may change in March, June, September, and December, and could be
16 higher or lower than the current rate. However, your fixed rate in the Standard
17 Offer Program will not change for 12 months. There are no fees for signing up for
18 the program and no early cancellation fees or penalties for switching to another
19 supplier. Prior to your fixed rate ending, you’ll receive two notices from your
20 supplier, who will provide you with a new offer. You may choose to accept that
21 new offer, or you can shop for another supplier or return to [OpCo]. [OpCo] is still

⁹ Please note that I advocate changing the name of the program back to the “Standard Offer Program,”

1 your utility company and is responsible for all your billing and service issues. You
2 will continue to receive only one bill from [OpCo]. Would you like to sign up for
3 the 7% discounted rate with the Standard Offer Program?"

4
5 **Q. In your summary you note that Mr. Geller has proposed that the Companies screen**
6 **calls to their call center to identify customers who are eligible to participate in the**
7 **Companies' respective customer assistance programs, known as CAP. (Cause-PA St.**
8 **No. 1, 51:18). Can you explain Mr. Geller's proposal?**

9
10 A. Yes, in his Direct Testimony, Mr. Geller recommends that the Companies screen otherwise
11 eligible Customer calls to identify those who have already been actively screened for CAP
12 eligibility, or who are in the process of being screened, so that those customers are not
13 offered the chance to participate in the CRP.

14
15 **Q. Why would Mr. Geller make such a recommendation?**

16 A. According to Mr. Geller, customers who are enrolled in CRP are not eligible for the CAP
17 program. Those who have been screened or are being screened and who are not enrolled
18 in CAP could be potentially disqualified from participating in CAP if they were also
19 enrolled in the CRP, and Mr. Geller wants to make sure that no CAP eligible customers are
20 excluded from the program due to the potential for adverse economic consequences to the
21 customer.

22
23 **Q. Do you oppose Mr. Geller's recommendation?**

24 A. Not to the extent that it applies only to customers who are, or potentially are, CAP eligible.
25 I do not agree that all high bill calls should be excluded from referral to the CRP, as Mr.
26 Geller appears to suggest.

1 **Q. Do you have anything else you wish to add at this time?**

2 A. No, and this concludes my Rebuttal Testimony.

3

EXHIBIT LGT-10

**PPL Electric Utilities Corporation
Response to Interrogatories of the
Interstate Gas Supply, Inc., Shipley Choice LLC, NRG Energy, Inc.,
Vistra Energy Corp., Engie Resources LLC, WGL Energy Services, Inc.,
and Direct Energy Services, LLC, Set II
Date June 2, 2020
Docket No. P-2020-3019356**

- Q. EGS-II-10. On Page 8 of Statement 4, footnote 7 states that some SOP customers leave their contracts before the conclusion of the term. What percentage of SOP customers did so during the same time period represented by the Charts MLS-1 through 4? Did PPL track the subsequent rates for those customers as it did for those who remained on the SOP contract to the end? If so, provide the data.
- A. EGS-II-10. PPL Electric analysis shows that during the January 2017 through December 2018 period, 62% of Residential customers and 55% of Small C&I customers left the SOP prior to conclusion of the 12-month contract term. See EGS-II-10 Attachment 1 which provides a breakdown of rates paid by customers, relative to the PPL Electric PTC, who left the SOP prior to the 12-month contract term and shopped with an EGS.

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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

**SURREBUTTAL TESTIMONY
OF LAURA GREENHOLT-TASTO
ON BEHALF
OF SHIPLEY CHOICE LLC D/B/A SHIPLEY ENERGY**

ShipleY Statement No. 1-SR
April 7, 2022

1 **Q. Please state your name.**

2 A. Laura Greenholt-Tasto.

3

4 **Q. Are you the same Laura Greenholt-Tasto who provided Direct and Rebuttal**
5 **Testimony in this same proceeding?**

6

7 A. Yes.

8

9 **Q. What is the purpose of this Surrebuttal Testimony?**

10 A. To address the Rebuttal Testimony and arguments made by Ms. Barbara Alexander on
11 behalf of the Office of Consumer Advocate and Ms. Joanne Savage on behalf of the
12 FirstEnergy Pennsylvania Operating Companies, Metropolitan Edison Company,
13 Pennsylvania Electric Company, Pennsylvania Power Company and West Penn Power
14 Company (collectively the “Companies”).

15

16 **Q. Has anything any other party said in their testimony, be it Direct or Rebuttal,**
17 **changed any of your views in this matter?**

18

19 A. No. The fact that I may not have addressed something, an issue, argument, or allegation,
20 in my Rebuttal or in this Surrebuttal does not mean that I agree with any other party or
21 witness on any subject. In other words, my silence should not be construed as agreement.

22

23 **Q. Can you please summarize your conclusions?**

24 A. Certainly. I will first explain my disagreement with Ms. Alexander’s conclusions about
25 the potential for suppliers to “game” the system to the detriment of customers if the
26 Companies were to modify the supplier Customer Referral Program (“CRP” also referred-

1 to as a “Standard Offer Program”) enrollment process to a system similar to that used by
2 PECO that allows suppliers to opt-in and out of the program on a 30-day basis. I will then
3 address FirstEnergy witness, Ms. Savage’s testimony on the same topic as well as her
4 testimony addressing my proposal that FirstEnergy allow for online enrollments into the
5 CRP.

6
7 **Q. Can you please explain your proposal for allowing customers to opt-in and out of the**
8 **CRP monthly?**

9
10 A. Certainly. In addition to the Companies’ service territories, Shipley also serves
11 customers on the PECO system, and participates in PECO’s standard offer program that,
12 importantly for this matter, allows suppliers to opt-in and out of the program on a monthly
13 basis, even though the price to compare can change quarterly. My reaction to the
14 Companies’ proposal in this case to change the reconciliation period for default service to
15 six months from the current three, is that I am concerned that requiring suppliers to
16 participate in the CRP for six months at a time will substantially increase the risk to
17 suppliers. In response, rather than directly opposing the proposal to go to a six-month
18 default service rate, I propose in my Direct Testimony that the Companies be required to
19 modify the CRP supplier process to allow suppliers to opt-in and out of the program
20 monthly – like PECO. My Direct Testimony states that allowing for a nimbler opt-in and
21 out requirement could help maintain, or even increase, participation in the CRP because
22 suppliers will be better able to manage the risks associated with not knowing how many
23 customers will actually sign up in advance of the CRP window, while also not knowing the
24 direction the wholesale market will head. The uncertainty regarding a market change
25 during the period in which suppliers must accept customers at the discounted rate can be

1 substantial if the wholesale market were to unexpectedly change a few months into the
2 program and a supplier is not fully hedged due to an influx of customers they weren't
3 expecting. The recent volatility in the market due to changes in the world market illustrates
4 the impacts that sudden and unexpected market changes can have. In order to illustrate
5 this risk, I will share a real-life example of how the 6-month opt in and out causes financial
6 harm and risk. PPL Utilities recently changed to a 6-month price to compare and
7 corresponding 6-month opt in/out period for suppliers participating in their standard offer
8 program. The SOP program opt-in example I share was for June 2021-November 2021,
9 with the next PTC becoming effective in December 2021. During the summer, Shipley
10 witnessed a similar amount of enrollments each month; until November. As soon as PPL
11 announced its new PTC, we saw a 393% increase in enrollments during the month of
12 November. The influx was due to PPL announcing a significant PTC increase. At face
13 value, it looks like the program worked well or as intended. However, as a supplier, we
14 witnessed substantial financial losses due to the timing of the commitment and market
15 movements. Back on April 29th, 2021, when looking to commit to the SOP program, PJM
16 PPL forward market costs for 12 months ranged from \$22 to \$42/MWh around the clock,
17 depending on the month. No one anticipated the type of market volatility that would ensue
18 3, 4 even 5 months later. By November 1, 2021, the PJM PPL market had risen to a range
19 of \$40 to \$87/MWh for the next 12 months. What this means is that by being committed
20 to the program, with no way of opting out, we were now taking on customers at a discount
21 to a PTC that was set 5-6 months prior when commodity prices were half the cost, a rate at
22 which the utility could now no longer serve (hence the update to the PTC in December),
23 and we were committed at double the costs for the next 12 months. We certainly would

1 have hedged and avoided this expense if we would have had a crystal ball and known that
2 we'd witness a 393% jump in enrollments in November, but alas, that is not something we
3 could have anticipated. To make matters worse, a NITS increase also went through during
4 the 6-month period, so that was an additional expense that we witnessed that was not a
5 factor when we first made the decision to enter the SOP program. I share all of this not to
6 complain, but merely to illustrate the real-life examples of why having a nimbler, monthly
7 opt in and out is so critical. There are many things outside a suppliers' control that can
8 come into play after opting in or out of a CRP program. Simply giving suppliers the option
9 to choose to opt in or out monthly will provide the ability to make sound financial decisions
10 based on then current market conditions and help ensure suppliers don't end up suffering
11 severe financial harm. Unlike the utility, suppliers do not have the luxury of guaranteed
12 recovery of costs due to unforeseen market conditions or customer movements.

13
14 **Q. What was Ms. Alexander's reaction to your monthly opt-in/out proposal?**

15 A. Ms. Alexander states that she does not oppose my proposal to allow suppliers to go in and
16 out of the program monthly, leaving that determination to the Companies. (OCA St. No.
17 2-R, 15:11). However, she goes on to testify that:

18 One concern that should be taken into account with this proposal is that the
19 EGSs know, or have the ability to know, about upcoming changes in the
20 PTC prior to customers being informed of this forthcoming change and can,
21 therefore, decide when it might be advantageous to enroll customers in the
22 Referral Program so that the EGS can benefit in the form of increased
23 revenues when the supplier's 7% discount is significantly reduced or
24 eliminated.
25

1 She then states that such hypothetical gaming (which is not possible I might add) “does not
2 appear to be fair and is another reason to eliminate this program.” (OCA St. No 2-R, 15:13-
3 19).

4
5 **Q. Do you agree that suppliers would be able to game the system as Ms. Alexander**
6 **suggests?**

7
8 **A.** No. Presently, suppliers on the Companies’ systems are notified approximately 60 days
9 prior to the start of the next quarter that they must submit their intent to participate.
10 Suppliers then receive a notice of the changed PTC and the resulting discounted rates
11 approximately 30 days before the beginning of the next quarter. If the supplier has
12 submitted an “intent to participate” and does nothing, it is committed to participate in the
13 program for the next quarter. In response to the price notification, the supplier also may
14 submit an “intent to withdraw” in which case it does not participate in the next quarter. In
15 effect, suppliers must decide whether to participate in the program before they know the
16 rate to which they must commit and have only the ability to withdraw if the rate is
17 unfavorable compared to their expectation and then-current market conditions. Ms.
18 Alexander’s theory simply is not possible in the real world. When a supplier is notified of
19 a default service rate change, it already has an obligation to its existing CRP customers to
20 serve them at a price that is fixed for the duration of the contract, so there is no opportunity
21 to “game” the system with regard to those customers. Likewise, since suppliers must
22 commit to serve customers before they know the price to which they are committing and
23 are only able to withdraw once the actual rates are known, there is no ability to game the
24 system, i.e. to buy low and sell high. There is no reason to believe that with a six-month
25 default service period the ability to game at the time of the PTC change would be any

1 different. Likewise, if Ms. Alexander is suggesting that suppliers earn extra profits when
2 the default service rate changes relative to the 1-year fixed price to which they and the
3 customer agreed; she is incorrect. Once a fixed price is locked in, assuming the supplier
4 has hedged the supply, the supplier's profit or loss is likewise locked in because it is based
5 on the price the customer is charged. The default service rate is not a market rate and has
6 no direct impact on a contract's profitability. The one-year rate commitment is the same,
7 and the notice periods would be the same, so a supplier would have no ability to leverage
8 the 30-day advance notice of the PTC change to a customer's detriment. I note that the
9 tariffs that implement the default service rates are also filed 30 days in advance of the
10 effective date of the rates, so presumably the public also is on notice of the new rates - 30
11 days in advance. Suppliers would be able to opt in and out of the program monthly if my
12 proposal were adopted, and the rates would be available to customers for two quarters (if
13 the Companies' proposal is adopted), but that circumstance provides no opportunity to
14 game the system because the customer will know the current rate. Accordingly, Ms.
15 Alexander's supposition, without any explanation, does not stand up to scrutiny and must
16 be disregarded, as must her contention that the CRP should be scrapped.

17
18 **Q. You said in your summary that Ms. Joanne Savage, testifying on behalf of the**
19 **Companies, also commented on your Direct Testimony, can you elaborate?**

20
21 **A.** Yes. Ms. Savage (Met-Ed/Penelec/Penn Power/West Penn ("FE")) Statement No. 1-R) first
22 addresses the opposition to the Customer Referral Program offered by the witnesses for the
23 OCA and Cause-PA and rejects them. In addressing my proposal that suppliers be
24 permitted to opt-in and out of CRP monthly and that customers be permitted to enroll
25 online, she rejects the monthly opt-in/out proposal as being too taxing for the Companies'

1 personnel. This, despite the Companies' admission that they clearly understand that
2 allowing suppliers to opt-in or out only twice per year, as they have proposed in this case,
3 will require suppliers to hold offers open for a much longer time period¹ - which will add
4 substantial risk for suppliers. Ms. Savage has provided no evidence to support her claim
5 about a monthly opt-in/out being too taxing or creating more work for personnel, other than
6 noting the Companies' desire to align everything on a twice-per-year cycle. She does not
7 address how many Company staff members would be impacted and how much time is
8 currently spent on managing the opting-in and out of suppliers. If Ms. Savage is suggesting
9 that suppliers should take on significant and real financial risks and impacts for the sake of
10 a few administration hours, perhaps a quick look at the program mechanics might shed
11 light on a way to reduce Companies' personnel impact. One could argue that it is extra
12 work today for suppliers and the Companies to have suppliers opt into the program 60 days
13 ahead of time when they don't know the price-to-compare they are committing to, only to
14 then to have to go back and opt out a few weeks later, at 30 days before the quarter, when
15 the price to compare is known. I find it difficult to understand why the Companies would
16 not just allow suppliers opt in at 30 days, which would eliminate the need for suppliers to
17 opt out. That would surely reduce Companies' personnel impact. By changing it to a
18 monthly opt in, a supplier could enter and stay in the program until they opt out for another
19 month. Then the Companies would only need to manage the new suppliers that end up
20 opting in or the ones that decide to opt out. All others would not need intervention.

¹ See Exhibit LGT – 11, FirstEnergy Response to Shipley Set I, No. 10

1 **Q. Is the FE proposal likely to be harmful if it were to be approved?**

2 A. It could be problematic, particularly for smaller suppliers like Shiplely that may not be able
3 to endure the risk of being required to hold open an offer for a one-year fixed price – for
4 up to 7 months before the electricity flows. Our only option may be to opt-out permanently.
5 Ms. Savage does not suggest that going to a monthly option is not possible or that it would
6 cause additional costs.

7

8 **Q. What does Ms. Savage say about the proposal, also supported by RESA, to allow for**
9 **online enrollment for customers into the CRP?**

10

11 A. Ms. Savage states (FE St. No. 1-R, 10:8-16) that the Companies do not oppose allowing
12 customers to enroll online. She then goes on to claim that based upon a “preliminary”
13 estimate it would cost approximately \$500,000 to implement such a program. Considering
14 that online sign-ups for service are increasing as a percentage of all enrollments (**Exhibit**
15 **LGT – 12**, Companies’ Response to Shiplely Set II, No. 1, Attachment A), and the
16 undeniable lower cost per enrollment of online enrollments, it is likely that those capital
17 costs will shortly be offset by lower operating costs – so long as both of those costs are
18 recovered in the Default Service Support Rider as they should be – making this effort
19 financially sound. Also, providing for online enrollments provides an enhanced
20 opportunity for the type of customer education that both Mr. Geller and Ms. Alexander
21 claim is needed. As an example, PECO, which allows for online enrollments, has a web
22 page dedicated to “Pennsylvania’s Standard Offer Program.”² The page explains how the
23 program works in plain language, provides a link to the page where customers can see the

² <https://www.peco.com/MyAccount/MyService/Pages/PennsylvaniaStandardOfferProgram.aspx>

1 current price to compare and see the date of the next change so customers are aware that
2 the rate will change and when. The page also has a link to a very well-designed page on
3 the Commission's PaPowerSwitch website that also explains, in greater detail, how the
4 program works and what to do at the end of the contract.³ Without the ability to enroll
5 online, this sort of opportunity to learn is far less attractive to customers. The Companies'
6 webpage describing the CRP is an example of a less than customer friendly page.⁴ The
7 point of this discussion is not to bash the Companies' website but to point out that when
8 designing a page that is seeking to gain customer attention so that they might enroll, it
9 naturally becomes a better vehicle for education and ongoing information resource for
10 customers who use it. With more customers commencing service online every year, the
11 ability to direct customers to online enrollment in this and other beneficial programs such
12 as CAP, will increase as well. I am confident that the investment in the online enrollment
13 opportunity will be money well spent. The Companies' 2015 estimate puts the cost at
14 \$2.18 per enrollment. (**Exhibit LGT – 13**, Response to Shipley Set II, No. 4, Attachment
15 A), while a more updated estimate (**Exhibit LGT – 14**, Response to Shipley Set II, No. 4,
16 Attachment B) would increase the per enrollment cost by approx. \$0.30. If, however, the
17 Commission does not feel comfortable authorizing online enrollment because of the \$2.58
18 per enrollment cost, the Companies could easily recover the cost through a cost-based fee.
19 However, because the Companies would not be required to pay the Contractor the existing
20 \$30 per customer enrollment fee for online enrollments, it is difficult to imagine how such
21 a fee for online enrollments would be justifiable or necessary.

³ <https://www.papowerswitch.com/about-switching-electricity/standard-offer-program/>

⁴ <https://www.firstenergycorp.com/supplierservices/pa/customer-referral-program.html>

1 **Q. Do you have anything else you wish to add?**

2 A. No, not at this time, and this concludes my Surrebuttal Testimony.

3

EXHIBIT LGT-11

**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-2021-3030012, P-2021-3030013, P-2021-3030014, and P-2021-3030021**

SHIPLEY CHOICE, LLC D/B/A SHIPLEY ENERGY Set I, No. 10

“In proposing the 6-month default service rate, did the Companies consider that doing so would require that EGSs choosing to opt into the Companies’ proposed Customer Referral Program would be required to hold open a price for six months without the ability to reconcile costs?”

RESPONSE:

Yes. The Companies acknowledge that the proposed change from 3-month to 6-month default service rate adjustments under their Price-to-Compare (“PTC”) Default Service Riders may increase the time the 7% discount off the PTC is effective during the Customer Referral Program (“CRP”) contract. However, the Commission has approved semi-annual PTC changes for other electric distribution companies notwithstanding potential impacts on electric generation suppliers (“EGSs”) that have voluntarily chosen to offer customers a twelve-month contract priced at 7% below the PTC at the time of the offer. *See, e.g., Petition of PPL Electric Utilities Corporation for Approval of its Default Service Plan for the Period June 1, 2021 through May 31, 2025*, Docket No. P-2020-3019356 (Opinion and Order entered Dec. 17, 2020) at Ordering Paragraph 15 (“Electric Generation Suppliers are required to commit to a semi-annual Standard Offer Program enrollment, which would correspond to PPL Electric Utilities Corporation’s semi-annual Price to Compare price change.”).

EXHIBIT LGT-12

Residential Service Applications Completed - 2017						
	Month	PN	ME	PP	WPP	Total
January	Total	5394	5942	1454	5965	18755
	Manual Agent	127	260	45	188	620
	Web process	26	44	15	38	123
	Live Agents	5241	5638	1394	5739	18012
February	Total	5375	6224	1486	5989	19074
	Manual Agent	176	271	56	176	679
	Web process	57	42	13	57	169
	Live Agents	5142	5911	1417	5756	18226
March	Total	7048	8163	1905	7503	24619
	Manual Agent	162	305	52	221	740
	Web process	39	55	19	49	162
	Live Agents	6847	7803	1834	7233	23717
April	Total	6065	7099	1771	6781	21716
	Manual Agent	168	299	67	227	761
	Web process	43	61	19	72	195
	Live Agents	5854	6739	1685	6482	20760
May	Total	8700	7869	2156	8408	27133
	Manual Agent	232	373	90	317	1012
	Web process	45	56	21	87	209
	Live Agents	8423	7440	2045	8004	25912
June	Total	9058	8923	2536	9257	29774
	Manual Agent	230	399	80	330	1039
	Web process	66	93	17	93	269
	Live Agents	8762	8431	2439	8834	28466
July	Total	8056	7827	2065	8964	26912
	Manual Agent	233	370	77	514	1194
	Web process	65	72	20	132	289
	Live Agents	7758	7385	1968	8318	25429
August	Total	10292	8920	2365	15231	36808
	Manual Agent	351	432	93	684	1560
	Web process	64	90	29	159	342
	Live Agents	9877	8398	2243	14388	34906
September	Total	8150	8443	2174	8826	27593
	Manual Agent	226	364	81	335	1006
	Web process	47	60	21	52	180
	Live Agents	7877	8019	2072	8439	26407
October	Total	7954	8139	2158	8181	26432
	Manual Agent	181	340	60	260	841
	Web process	32	55	15	48	150
	Live Agents	7741	7744	2083	7873	25441
November	Total	7453	7939	1969	7671	25032
	Manual Agent	207	320	51	269	847
	Web process	50	46	16	74	186
	Live Agents	7196	7573	1902	7328	23999
December	Total	6373	7329	1929	7052	22683
	Manual Agent	148	264	66	250	728
	Web process	37	41	14	44	136
	Live Agents	6188	7024	1849	6758	21819
2017	Total	89918	92817	23968	99828	306531
	Manual Agent	2441	3997	818	3771	11027
	Web process	571	715	219	905	2410
	Live Agents	86906	88105	22931	95152	293094
Residential Service Applications Completed - 2018						
	Month	PN	ME	PP	WPP	Total
January	Total	5669	5901	1477	6193	19240
	Manual Agent	172	259	53	216	700
	Web process	27	37	20	57	141
	Live Agents	5470	5605	1404	5920	18399
	Total	5291	5905	1567	5693	18456

February	Manual Agent	142	235	54	199	630
	Web process	34	53	11	46	144
	Live Agents	5115	5617	1502	5448	17682
March	Total	6723	7335	2018	7126	23202
	Manual Agent	172	333	90	279	874
	Web process	390	60	19	66	535
	Live Agents	6161	6942	1909	6781	21793
April	Total	6312	6910	1871	7063	22156
	Manual Agent	221	379	96	303	999
	Web process	40	63	20	74	197
	Live Agents	6051	6468	1755	6686	20960
May	Total	8465	8003	2238	8546	27252
	Manual Agent	289	417	82	403	1191
	Web process	71	77	15	100	263
	Live Agents	8105	7509	2141	8043	25798
June	Total	8804	8729	2335	9336	29204
	Manual Agent	249	446	99	414	1208
	Web process	66	91	29	97	283
	Live Agents	8489	8192	2207	8825	27713
July	Total	8106	8104	2306	9269	27785
	Manual Agent	315	478	105	635	1533
	Web process	73	70	30	175	348
	Live Agents	7718	7556	2171	8459	25904
August	Total	10385	9203	2671	15306	37565
	Manual Agent	346	460	99	681	1586
	Web process	61	84	24	148	317
	Live Agents	9978	8659	2548	14477	35662
September	Total	7370	7252	1975	7936	24533
	Manual Agent	225	347	84	408	1064
	Web process	44	69	14	70	197
	Live Agents	7101	6836	1877	7458	23272
October	Total	8503	8302	2181	8598	27584
	Manual Agent	251	412	86	311	1060
	Web process	48	61	19	81	209
	Live Agents	8204	7829	2076	8206	26315
November	Total	7560	7706	1913	7723	24902
	Manual Agent	220	355	69	263	907
	Web process	51	62	21	84	218
	Live Agents	7289	7289	1823	7376	23777
December	Total	5531	6417	1519	6279	19746
	Manual Agent	36	46	47	58	187
	Web process	168	266	10	230	674
	Live Agents	5327	6105	1462	5991	18885
2018	Total	88719	89767	24071	99068	301625
	Manual Agent	2638	4167	964	4170	11939
	Web process	1073	993	232	1228	3526
	Live Agents	85008	84607	22875	93670	286160

Residential Service Applications Completed - 2019

	Month	PN	ME	PP	WPP	Total
	Total	5814	6017	1529	6127	19487
January	Manual Agent	169	245	68	235	717
	Web process	31	47	9	50	137
	Live Agents	5614	5725	1452	5842	18633
	Total	5219	5634	1354	5529	17736
February	Manual Agent	146	253	50	175	624
	Web process	100	148	37	116	401
	Live Agents	4973	5233	1267	5238	16711
	Total	6157	6831	1819	6828	21635
March	Manual Agent	63	115	28	67	273
	Web process	251	366	105	311	1033
	Live Agents	5843	6350	1686	6450	20329
	Total	6895	7095	1963	7334	23287
April	iWd Agent	267	407	35	331	1040

	Web process	66	128	101	84	379
	Live Agents	6562	6560	1827	6919	21868
	Total	8855	8118	2154	8772	27899
May	Manual Agent	73	142	27	97	339
	Web process	330	461	102	451	1344
	Live Agents	8452	7515	2025	8224	26216
	Total	7494	7739	2077	7937	25247
June	Manual Agent	81	147	35	109	372
	Web process	351	469	143	545	1508
	Live Agents	7062	7123	1899	7283	23367
	Total	8543	8207	2169	9626	28545
July	Manual Agent	92	164	35	165	456
	Web process	390	547	115	799	1851
	Live Agents	8061	7496	2019	8662	26238
	Total	9777	9028	2464	14740	36009
August	Manual Agent	406	551	115	820	1892
	Web process	161	165	34	161	521
	Live Agents	9210	8312	2315	13759	33596
	Total	7329	7398	1978	7837	24542
September	Manual Agent	89	139	29	100	357
	Web process	332	534	97	332	1295
	Live Agents	6908	6725	1852	7405	22890
	Total	8281	8276	2211	8655	27423
October	Manual Agent	78	139	23	105	345
	Web process	322	482	92	417	1313
	Live Agents	7881	7655	2096	8133	25765
	Total	7291	7668	1940	7796	24695
November	Manual Agent	77	156	28	101	362
	Web process	315	461	82	404	1262
	Live Agents	6899	7051	1830	7291	23071
	Total	6264	6799	1742	6699	21504
December	Manual Agent	62	110	22	76	270
	Web process	242	388	84	324	1038
	Live Agents	5960	6301	1636	6299	20196
	Total	87919	88810	23400	97880	298009
2019	Manual Agent	1603	2568	495	2381	7047
	Web process	2891	4196	1001	3994	12082
	Live Agents	83425	82046	21904	91505	278880

Residential Service Applications Completed - 2020						
	Month	PN	ME	PP	WPP	Total
January	Total	5826	6276	1600	6400	20102
	Manual Agent	54	94	30	68	246
	Web process	244	367	70	344	1025
	Live Agents	5528	5815	1500	5988	18831
February	Total	5317	6166	1614	5855	18952
	Manual Agent	259	402	23	376	1060
	Web process	79	107	91	74	351
	Live Agents	4979	5657	1500	5405	17541
March	Total	5934	6800	1673	6491	20898
	iWd Agent	49	113	44	81	287
	Web process	254	473	70	405	1202
	Live Agents	5631	6214	1559	6005	19409
April	Total	5075	5087	1440	5379	16981
	Manual Agent	79	97	20	94	290
	Web process	248	366	80	372	1066
	Live Agents	4748	4624	1340	4913	15625
May	Total	5663	5239	1452	5946	18300
	Manual Agent	88	121	30	79	318
	Web process	290	415	82	410	1197
	Live Agents	5285	4703	1340	5457	16785
June	Total	6557	6075	1733	6842	21207
	Manual Agent	70	156	36	135	397
	Web process	323	494	125	535	1477

	Live Agents	6164	5425	1572	6172	19333
July	Total	8080	7770	2308	9953	28111
	Manual Agent	124	206	37	269	636
	Web process	463	620	140	899	2122
	Live Agents	7493	6944	2131	8785	25353
August	Total	7515	7286	2050	12753	29604
	Manual Agent	128	195	62	249	634
	Web process	466	635	149	945	2195
	Live Agents	6921	6456	1839	11559	26775
September	Total	7008	7580	1969	8146	24703
	Manual Agent	122	218	45	151	536
	Web process	438	705	130	623	1896
	Live Agents	6448	6657	1794	7372	22271
October	Total	7504	8001	2104	8337	25946
	Manual Agent	89	160	31	118	398
	Web process	354	589	125	488	1556
	Live Agents	7061	7252	1948	7731	23992
November	Total	5890	6578	1610	6409	20487
	Manual Agent	146	477	45	135	803
	Web process	375	663	109	577	1724
	Live Agents	5369	5438	1456	5697	17960
December	Total	6197	7216	1826	6889	22128
	Manual Agent	100	169	40	129	438
	Web process	283	495	109	453	1340
	Live Agents	5814	6552	1677	6307	20350
2020	Total	76566	80074	21379	89400	267419
	Manual Agent	1308	2408	443	1884	6043
	Web process	3817	5929	1280	6125	17151
	Live Agents	71441	71737	19656	81391	244225

Residential Service Applications Completed - 2021

	Month	PN	ME	PP	WPP	Total	
January	Total	5167	5891	1429	5814	18301	
	Manual Agent	86	153	34	111	384	
	Web process	326	523	104	436	1389	0.075897492
	Live Agents	4755	5215	1291	5267	16528	
February	Total	4823	5173	1445	5304	16745	
	Manual Agent	60	110	29	99	298	
	Web process	251	447	77	350	1125	0.067184234
	Live Agents	4512	4616	1339	4855	15322	
March	Total	5870	6645	1684	6678	20877	
	Manual Agent	73	141	36	92	342	
	Web process	335	508	102	505	1450	0.069454424
	Live Agents	5462	5996	1546	6081	19085	
April	Total	6506	6997	1869	7039	22411	
	Manual Agent	68	142	35	107	352	
	Web process	325	523	132	467	1447	0.064566508
	Live Agents	6113	6332	1702	6465	20612	
May	Total	6647	6599	1755	7045	22046	
	Manual Agent	95	186	48	145	474	
	Web process	354	601	109	592	1656	0.075115667
	Live Agents	6198	5812	1598	6308	19916	
June	Total	7389	7696	2056	8205	25346	
	Manual Agent	105	198	49	166	518	
	Web process	444	692	143	736	2015	0.079499724
	Live Agents	6840	6806	1864	7303	22813	
July	Total	7748	7960	2260	10196	28164	
	Manual Agent	115	191	54	208	568	
	Web process	403	714	148	921	2186	0.077616816
	Live Agents	7230	7055	2058	9067	25410	
August	Total	7566	7636	2106	12506	29814	
	Manual Agent	221	192	58	221	692	
	Web process	480	730	192	1106	2508	0.084121554
	Live Agents	6865	6714	1856	11179	26614	

September	Total	6815	6909	1988	7548	23260	0.079234738
	Manual Agent	90	179	41	136	446	
	Web process	469	607	174	593	1843	
	Live Agents	6256	6123	1773	6819	20971	
October	Total	6587	6816	1961	7160	22524	0.080092346
	Manual Agent	95	150	39	106	390	
	Web process	407	660	151	586	1804	
	Live Agents	6085	6006	1771	6468	20330	
November	Total	6482	6767	1848	6947	22044	0.096761023
	Manual Agent	117	251	57	166	591	
	Web process	486	768	172	707	2133	
	Live Agents	5879	5748	1619	6074	19320	
December	Total	5801	7062	1760	6746	21369	0.07052272
	Manual Agent	75	149	30	112	366	
	Web process	333	578	107	489	1507	
	Live Agents	5393	6335	1623	6145	19496	
2021	Total	77401	82151	22161	91188	272901	0.077181835
	Manual Agent	1200	2042	510	1669	5421	
	Web process	4613	7351	1611	7488	21063	
	Live Agents	71588	72758	20040	82031	246417	

EXHIBIT LGT-13

*Supplier Services
 Issues Documentation / Resolution*



Appendix B

Cost Breakdown:

IT Labor Hours	Hours	
SAP/ABAP	2000	Project manager for IT Require user to create their login credentials: User id/password Create and load test data for business Testing thru various stages Dev and QA environments Change Management to move to production Write new SAP RFC Function Module to extract required data and send to AllConnect – possibly leveraging the function module currently used
Java	1600	Build new pages per business requirements Create secured URL to pass data to AllConnect Create interface to web service and remote function call Leverage current registration functionality Change Management to move code through various testing environments
WebMethods	900	Web Service to call RFC to pick up data and pass data via a secured connection to AllConnect Testing thru various stages Dev and QA environments
BU Labor Hours	Hours	
Business Analyst	500	Project manager to work with IT project manager to identify requirements; restrictions – if any, create test scenarios, test changes, communicate to all applicable business units
Total Project	5000	

Resource Type	Hours	Cost Estimate	Assumptions/ Constraints
IT Labor Hours	4500	\$315,000.00	SAP, JAVA & Web Services
BU Labor Hours	500	\$ 35,000.00	
Allconnect		\$ 75,000.00	
Total Project	5000	\$425,000.00	

Based on the number of enrollments for 2015-2017 DSP, the cost to suppliers for a web based process would \$2.18 per enrollment.

EXHIBIT LGT-14

2022 CRP Web IT Estimate

IT Labor Hours	Hours	
SAP/ABAP	2800*	Project manager for IT Create and load test data for business Testing thru various stages Dev and QA environments Change Management to move to production Write new SAP programs to extract required data
Java	1600*	Build new pages per business requirements Presentment of SAP required data Leverage current registration functionality Change Management to move code through various testing environments
WebMethods	100	Web Service to call SAP program to pick up data and pass data to web Testing thru various stages Dev and QA environments
BU Labor Hours	Hours	
Business Analyst	500	Project manager to work with IT project manager to identify requirements; restrictions – if any, create test scenarios, test changes, communicate to all applicable business units
Total Project	5000	

Resource Type	Hours	Cost Estimate	Assumptions/ Constraints
IT Labor Hours	4500	\$405,000.00	SAP, JAVA & Web Services
BU Labor Hours	500	\$ 45,000.00	
Total Project	5000	\$450,000.00	*If using IT contractors total will be \$498,000

- IT may support using Contractors. If Contractors are used we estimate an increase of \$48,000.*
- IT estimates 9 - 12 month to complete project.
- This estimate assumes FE will create a full homegrown solution and doesn't include a vendor supported offering.

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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

**VERIFICATION OF
LAURA GREENHOLT-TASTO**

I, Laura Greenholt-Tasto, hereby verify the following facts:

- 1) I am the Vice President of Marketing for Shipley Group LP., and my business address is 415 Norway Street, York, PA 17403;
- 2) I have been duly authorized by Shipley Choice, LLC d/b/a Shipley Energy to testify on their behalf in the above-captioned matter;
- 3) I prepared Shipley Statement No. 1 and Exhibits LGT-1 through LGT-9, which is my Direct Testimony and Exhibits;
- 4) I prepared Shipley Statement No. 1-R and Exhibit LGT-10, which is my Rebuttal Testimony and Exhibit;
- 5) I prepared Shipley Statement No. 1-SR and Exhibits LGT-11 through LGT-14, which is my Surrebuttal Testimony and Exhibits; and,
- 6) Shipley Statement Nos. 1, 1-R and 1-SR are true and correct to the best of my knowledge, information, and belief, and if a hearing were held today and I were asked the same questions, my answers would be the same as contained in each of my Statements. I understand

that my statements are made subject to the penalties of 18 Pa.C.S. § 4904 (relating to unsworn falsification to authorities).

Laura Greenholt-Tasto

Laura Greenholt-Tasto
Vice President of Marketing
Shipley Group LP

DATED: 4/11/2022

List of Statements and Exhibits

DOCUMENT IDENTIFIER	DOCUMENT DESCRIPTION
Shipley Statement No. 1	Direct Testimony of Laura Greenholt-Tasto
Exhibit LGT-1	FirstEnergy Response to Shipley Set I, No. 8
Exhibit LGT-2	FirstEnergy Response to Shipley Set II, No. 6
Exhibit LGT-3	FirstEnergy Response to Shipley Set II, No. 7
Exhibit LGT-4	FirstEnergy Response to Shipley Set I, No. 4
Exhibit LGT-5	FirstEnergy Response to Shipley Set I, No. 3 & Attachment A
Exhibit LGT-6	FirstEnergy Response to Shipley Set II, No. 3
Exhibit LGT-7	FirstEnergy Response to Shipley Set I, No. 5
Exhibit LGT-8	FirstEnergy Response to Shipley Set I, No. 1
Exhibit LGT-9	FirstEnergy Response to Shipley Set I, No. 2
Shipley Statement No. 1-R	Rebuttal Testimony of Laura Greenholt-Tasto
Exhibit LGT-10	Exhibit EGS-1, PPL Electric Utilities Corporation Response to NGS Parties' Set II, No. 10
Shipley Statement No. 1-SR	Surrebuttal Testimony of Laura Greenholt-Tasto
Exhibit LGT-11	FirstEnergy Response to Shipley Set I, No. 10
Exhibit LGT-12	FirstEnergy Response to Shipley Set II, No. 1, Attachment A
Exhibit LGT-13	FirstEnergy Response to Shipley Set II, No. 4, Attachment A
Exhibit LGT-14	FirstEnergy Response to Shipley Set II, No. 4, Attachment B

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 MAIL ONLY

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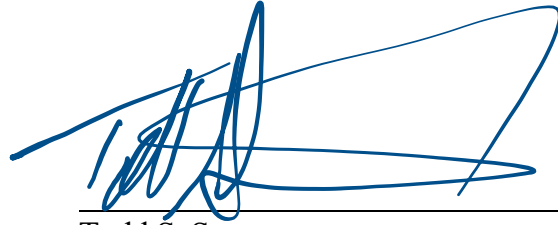
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DATED: April 21, 2022

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