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Petition of Metropolitan Edison Company for Approval of Default Service Program

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

Pennsylvania Electric Company Joint Petition for Default Service Plan

Petition of Pennsylvania Power Company for Approval of Default Service Program

West Penn Power Joint Petition for Default Service Plan  
v.

Initial Call-In  
Telephonic  
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Pages 36 - 98

April 13, 2022  
Commencing at 10:07 a.m.

INDEX TO EXHIBITS

Docket No. P-2021-3030012, P-2021-3030013,  
P-2021-3030014, P-2021-3030021  
Hearing Date: April 13, 2022

<u>NUMBER</u>	<u>FOR IDENTIFICATION</u>	<u>IN EVIDENCE</u>
ALJ Exhibit 1		
Group Exhibit,		
Verifications	58	58

**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**

**OFFICE OF CONSUMER ADVOCATE Set XI, No. 1**

“With regard to your summary of the requests for customer usage data summarized on page 10 of Rebuttal, please breakdown these requests by whether the entity requesting the data is a registered CSP (and the type or business of the entity if not a CSP) and provide the customer class breakdown of the customers for which this data was sought for each period.”

**RESPONSE:**

The requests for customer usage, as identified on page 3<sup>1</sup> of Statement No. 6R, were received from curtailment service providers and/or conservation service providers.<sup>2</sup> The Companies do not track the breakdown of the requestors or the customer class for which this data was sought.

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<sup>1</sup> The Companies assume that this request refers to the quantitative results corresponding with requests for customer data identified at page 3 of Statement No. 6R as requests for customer usage data are not summarized at page 10.

<sup>2</sup> This request seeks a breakdown of customer data requests by “a registered CSP”. The Companies are not certain as to the intended use of this term within the context of this question, but are using it to reference all CSPs registered under both the AEPS Act and also as registered with PJM Interconnection, LLC.

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Joint Petition of Metropolitan Edison Company,  
Pennsylvania Electric Company,  
Pennsylvania Power Company, and  
West Penn Power Company  
: for approval of their Default Service Programs  
: P-2021-3030012  
: P-2021-3030013  
: P-2021-3030014  
: P-2021-3030021

**VERIFICATION**

I, Kenneth Schisler, Senior Vice President of Regulatory Affairs at Enerwise Global Technologies, LLC doing business as CPower Energy Management ("CPower"), verify that the following testimony was prepared by me or under my direct supervision and is true and correct to the best of my knowledge, information and belief:

- a. Enerwise Global Technologies, LLC d/b/a CPower Energy Management Statement No. 1 (Direct Testimony of Kenneth Schisler)
- b. Enerwise Global Technologies, LLC d/b/a CPower Energy Management Statement No. 1R (Rebuttal Testimony of Kenneth Schisler)

I understand that false statements herein are made subject to the penalties of 18 Pa. C.S. §4904, relating to unsworn falsifications to authorities.



Kenneth Schisler

Date: April 11, 2022

questions, my answers would be the same as contained in each of my Statements. I understand

knowledge, information, and belief, and if a hearing were held today and I were asked the same

6) Shipley Statement Nos. 1, 1-R and 1-SR are true and correct to the best of my

which is my Surrebuttal Testimony and Exhibits; and,

5) I prepared Shipley Statement No. 1-SR and Exhibits LGT-11 through LGT-14,

Testimony and Exhibit;

4) I prepared Shipley Statement No. 1-R and Exhibit LGT-10, which is my Rebuttal

my Direct Testimony and Exhibits;

3) I prepared Shipley Statement No. 1 and Exhibits LGT-1 through LGT-9, which is

on their behalf in the above-captioned matter;

2) I have been duly authorized by Shipley Choice, LLC d/b/a Shipley Energy to testify

address is 415 Norway Street, York, PA 17403;

1) I am the Vice President of Marketing for Shipley Group LP, and my business

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

**VERIFICATION OF  
LAURA GREENHOLT-TASTO**

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

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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

falsification to authorities).

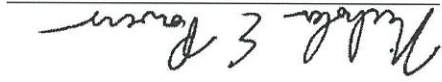
*Laura Greenholt-Tasto*  
\_\_\_\_\_  
Laura Greenholt-Tasto  
Vice President of Marketing  
Shipley Group LP

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

Nicholas E. Powers



James D. Reitzes



Dated: April 12, 2022

Rebuttal Testimony of James D. Reitzes and Nicholas E. Powers

Met-Ed/Penelec/Penn Power/West Penn Statement No. 4R

Comparisons of Default Service Full Requirements Auction Price to Expected Wholesale Market Costs

Exhibit JDR-NEP-1

Direct Testimony of James D. Reitzes and Nicholas E. Powers

Met-Ed/Penelec/Penn Power/West Penn Statement No. 4

provisions and penalties of 18 Pa. C.S. § 4904 (relating to unsworn falsification to authorities).

I, James D. Reitzes and Nicholas E. Powers, hereby state that the facts set forth in the pre-marked statement(s) and exhibit(s), if any, listed below are true and correct to the best of my knowledge information and belief. I understand that this verification is made subject to the

**VERIFICATION**

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 JUNE 1, 2023 TO MAY 31, 2027	:	

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

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



Dated: April 12, 2022

*Tiffanne L. Cowan*

Tiffanne L. Cowan

Met-Ed/Penelec/Penn Power/West Penn Statement No. 6R	Met-Ed/Penn Power/West Penn Rebuttal Testimony of Tiffanne L. Cowan
Exhibit TLC-4	West Penn Third-Party Data Access Tariff
Exhibit TLC-3	Penn Power Third-Party Data Access Tariff
Exhibit TLC-2	Penelec Third-Party Data Access Tariff
Exhibit TLC-1	Met-Ed Third-Party Data Access Tariff
Met-Ed/Penelec/Penn Power/West Penn Statement No. 6	Direct Testimony of Tiffanne L. Cowan

I, **Tiffanne L. Cowan**, hereby state that the facts set forth in the pre-marked statement(s) and exhibit(s), if any, listed below are true and correct to the best of my knowledge information and belief. I understand that this verification is made subject to the provisions and penalties of 18 Pa. C.S. § 4904 (relating to unsworn falsification to authorities).

**VERIFICATION**

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 JUNE 1, 2023 TO MAY 31, 2027

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

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION



Proposed Procurement Schedule	Exhibit JHC-1
Bidding Rules for Default Service Auctions	Exhibit JHC-2
Appendix 1-Part 1 Application	Exhibit JHC-3
Appendix 2-Part 2 Application	Exhibit JHC-4
Alternative Energy Portfolio Standards Act Percentages	Exhibit JHC-5
Long-Term Solar Request for Proposals	Exhibit JHC-6
Independent Credit Requirement Per Tranche Schedule	Exhibit JHC-7

Met-Ed/Penelec/Penn Power/ West Penn Direct Testimony of James H. Catanach Statement No. 2 (CORRECTED VERSION)

I, James H. Catanach, hereby state that the facts set forth in the pre-marked statement(s) and exhibit(s), if any, listed below are true and correct to the best of my knowledge information and belief. I understand that this verification is made subject to the provisions and penalties of 18 Pa. C.S. § 4904 (relating to unsworn falsification to authorities).

**VERIFICATION**

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 JUNE 1, 2023 TO MAY 31, 2027

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

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

Met-Ed/Penelec/Penn Power/West Penn  
Statement No. 2R

Exhibit JHC-2R

Bidding Rules for Default Service Auctions  
(Revised)

Exhibit JHC-8

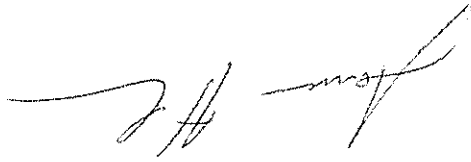
Constellation Response to Interrogatory  
ME/PE/PP/WP (Constellation)-I-2

Exhibit JHC-9

Constellation Response to Interrogatory  
ME/PE/PP/WP (Constellation)-I-3

Dated: April 12, 2022

James H. Catanach



I, Patricia M. Larkin, hereby state that the facts set forth in the pre-marked statement(s) and exhibit(s), if any, listed below are true and correct to the best of my knowledge information and belief. I understand that this verification is made subject to the provisions and penalties of 18 Pa. C.S. § 4904 (relating to unsworn falsification to authorities).

**VERIFICATION**

Docket Nos. R-2021-3030012 R-2021-3030013 R-2021-3030014 R-2021-3030021	:	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 JUNE 1, 2023 TO MAY 31, 2027
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**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Met-Ed/Penelec/Penn Power/West Penn  
Statement No. 5

Exhibit PML-1 Price-to-Compare ("PTC") History

Exhibit PML-2 Comparison of Three-Month and Six-Month  
PTC E-Factors

Exhibit PML-3 Met-Ed Electric Pa. P.U.C. No. 52 ("Tariff No.  
52") Definitions

Exhibit PML-4 Penelec Electric Pa. P.U.C. No. 81 ("Tariff No.  
81") Definitions

Exhibit PML-5 Penn Power Electric Pa. P.U.C. No. 36 ("Tariff  
No. 36") Definitions

Exhibit PML-6 West Penn Electric Pa. P.U.C. No. 40 ("Tariff  
No. 40") Definitions

Exhibit PML-7 Met-Ed PTC Default Service Rate Rider

Exhibit PML-8 Penelec PTC Default Service Rate Rider

Exhibit PML-9 Penn Power PTC Default Service Rate Rider

Exhibit PML-10 West Penn PTC Default Service Rate Rider

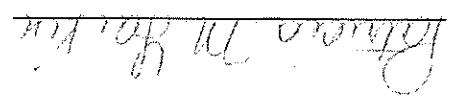
Met-Ed Hourly Pricing ("HP") Default Service Rider	Exhibit PML-11
Penelec HP Default Service Rider	Exhibit PML-12
Penn Power HP Default Service Rider	Exhibit PML-13
West Penn HP Default Service Rider Tariff No. 40	Exhibit PML-14
West Penn HP Default Service Rider Tariff No. 38	Exhibit PML-15
Met-Ed Default Service Support Rider ("DSS")	Exhibit PML-16
Penelec DSS Rider	Exhibit PML-17
Met-Ed Electric Generation Supplier Coordination Tariff ("Supplier Tariff") (Relevant Pages)	Exhibit PML-18
Penelec Supplier Tariff (Relevant Pages)	Exhibit PML-19
Penn Power Supplier Tariff (Relevant Pages)	Exhibit PML-20
West Penn Supplier Tariff (Relevant Pages)	Exhibit PML-21
Met-Ed/Penelec/Penn Power/West Penn System Total Peak Usage Analysis	Exhibit PML-22
Met-Ed Customer Class Pricing Analysis and Time-of-Use Pricing Analysis	Exhibit PML-23
Penelec Customer Class Pricing Analysis and Time-of-Use Pricing Analysis	Exhibit PML-24
Penn Power Customer Class Pricing Analysis and Time-of-Use Pricing Analysis	Exhibit PML-25

West Penn Customer Class Pricing Analysis and Time-of-Use Pricing Analysis	Exhibit PML-26
Met-Ed Time-of-Use Default Service Rider	Exhibit PML-27
Penelec Time-of-Use Default Service Rider	Exhibit PML-28
Penn Power Time-of-Use Default Service Rider	Exhibit PML-29
West Penn Time-of-Use Default Service Rider	Exhibit PML-30
Met-Ed/Penelec/Penn Power/West Penn Estimated DSP VI Administrative Costs	Exhibit PML-31
Rebuttal Testimony of Patricia M. Larkin	Statement No. 5R
RESA/NRG Response to Interrogatory ME/PN/PP/WP (RESA/NRG)-1-15	Exhibit PML-32
Shipley Response to Interrogatory ME/PN/PP/WP (Shipley)-1-1	Exhibit PML-33
CAUSE-PA Response to Interrogatory ME/PN/PP/WP (CAUSE-PA)-1-2	Exhibit PML-34

Met-Ed/Penelec/Penn Power/West Penn  
Statement No. SR-Supplemental

Exhibit PML-35

Dated: April 12, 2022



Patricia M. Larkin

Supplemental Rebuttal Testimony of Patricia  
M. Larkin  
Illustrative Example of the Appropriateness of  
Gross-Up for Losses



Joanne M. Savage

Dated: April 12, 2022

Documented by: Joanne M. Savage  
E3AF955FE48649C...

Met-Ed/Penelec/Penn Power/ West Penn Statement No. 1R	Rebuttal Testimony of Joanne M. Savage
Exhibit JMS-3	Purchase of Receivables Clawback Charge Calculations
Exhibit JMS-2	Customer Referral Program Agreement
Exhibit JMS-1	Index of the Companies' Response to the Topics Set Forth in the Secretarial Letter Issued on January 23, 2020 at Docket No. M-2019-3007101
Met-Ed/Penelec/Penn Power/ West Penn Statement No. 1	Direct Testimony of Joanne M. Savage

I, **Joanne M. Savage**, hereby state that the facts set forth in the pre-marked statement(s) and exhibit(s), if any, listed below are true and correct to the best of my knowledge information and belief. I understand that this verification is made subject to the provisions and penalties of 18 Pa. C.S. § 4904 (relating to unsworn falsification to authorities).

**VERIFICATION**

JOINT PETITION OF METROPOLITAN  
EDISON COMPANY, PENNSYLVANIA  
ELECTRIC COMPANY,  
AND WEST PENN POWER COMPANY,  
PENNSYLVANIA POWER COMPANY,  
FOR APPROVAL OF THEIR DEFAULT  
SERVICE PROGRAMS FOR THE  
PERIOD JUNE 1, 2023 TO MAY 31, 2027

:  
:  
: Docket Nos. R-2021-3030012  
: R-2021-3030013  
: R-2021-3030014  
: R-2021-3030021

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Dated: April 12, 2022

Edward B. Stein

*Edward B. Stein*

Met-Ed/Penelec/Penn Power/West Penn  
Statement No. 8R-Supplemental  
B. Stein  
Supplemental Rebuttal Testimony of Edward

I, **Edward B. Stein**, hereby state that the facts set forth in the pre-marked statement(s) and exhibit(s), if any, listed below are true and correct to the best of my knowledge information and belief. I understand that this verification is made subject to the provisions and penalties of 18 Pa. C.S. § 4904 (relating to unsworn falsification to authorities).

**VERIFICATION**

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 JUNE 1, 2023 TO MAY 31, 2027  
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Docket Nos, R-2021-3030012  
R-2021-3030013  
R-2021-3030014  
R-2021-3030021

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Kenneth A. Strah



Dated: April 12, 2022

Met-Ed/Penelec/Penn Power/West Penn  
Statement No. 7R  
Rebuttal Testimony of Kenneth A. Strah

I, **Kenneth A. Strah**, hereby state that the facts set forth in the pre-marked statement(s) and exhibit(s), if any, listed below are true and correct to the best of my knowledge information and belief. I understand that this verification is made subject to the provisions and penalties of 18 Pa. C.S. § 4904 (relating to unsworn falsification to authorities).

**VERIFICATION**

Docket Nos. R-2021-3030012	:	JOINT PETITION OF METROPOLITAN
R-2021-3030013	:	EDISON COMPANY, PENNSYLVANIA
R-2021-3030014	:	ELECTRIC COMPANY,
R-2021-3030021	:	PENNSYLVANIA POWER COMPANY,
	:	AND WEST PENN POWER COMPANY,
	:	FOR APPROVAL OF THEIR DEFAULT
	:	SERVICE PROGRAMS FOR THE
	:	PERIOD JUNE 1, 2023 TO MAY 31, 2027

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Wanyun Zhong

Dated: April 12, 2022

Wanyun Zhong

Direct Testimony of Wanyun Zhong

Default Service Supplier Master Agreement

Rebuttal Testimony of Wanyun Zhong

Default Service Supplier Master Agreement (Revised)

Illustrative Example of CPP True Up Methodologies

Met-Ed/Penelec/Penn Power/West Penn Statement No. 3

Exhibit WZ-1

Met-Ed/Penelec/Penn Power/West Penn Statement No. 3R

Exhibit WZ-1R (CORRECTED VERSION)

Exhibit WZ-2

I, **Wanyun Zhong**, hereby state that the facts set forth in the pre-marked statement(s) and exhibit(s), if any, listed below are true and correct to the best of my knowledge information and belief. I understand that this verification is made subject to the provisions and penalties of 18 Pa. C.S. § 4904 (relating to unsworn falsification to authorities).

**VERIFICATION**

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 JUNE 1, 2023 TO MAY 31, 2027

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

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION