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August 19, 2020

VIA ELECTRONIC FILING

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor
Harrisburg, PA 17120

Re: Joint Petition of Metropolitan Edison Company, Pennsylvania Electric Company, Pennsylvania Power Company, and West Penn Power Company for Approval to Modify Their Supplier Master Agreement; Docket Nos.

Dear Secretary Chiavetta:

Metropolitan Edison Company (“Met-Ed”), Pennsylvania Electric Company (“Penelec”), Pennsylvania Power Company (“Penn Power”), and West Penn Power Company (“West Penn”) (collectively, the “Companies”) hereby submit the above-referenced Joint Petition. **Please note that the Companies are seeking expedited review of the Joint Petition and requesting approval by no later than the Pennsylvania Public Utility Commission’s October 8, 2020 public meeting.**

Please contact me if you have any questions regarding this matter.

Very truly yours,



Teresa Harrold

Enclosures

c: As Per Certificate of Service

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Joint Petition of Metropolitan Edison	:	
Company, Pennsylvania Electric Company,	:	Docket No. _____
Pennsylvania Power Company and West	:	Docket No. _____
Penn Power Company for Approval to	:	Docket No. _____
Modify Their Supplier Master Agreement	:	Docket No. _____

**JOINT PETITION OF METROPOLITAN EDISON COMPANY,
PENNSYLVANIA ELECTRIC COMPANY,
PENNSYLVANIA POWER COMPANY,
AND WEST PENN POWER COMPANY**

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Dated: August 19, 2020

**Counsel for:
Metropolitan Edison Company,
Pennsylvania Electric Company,
Pennsylvania Power Company, and
West Penn Power Company**

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Joint Petition of Metropolitan Edison	:	
Company, Pennsylvania Electric Company,	:	Docket No. _____
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**JOINT PETITION OF METROPOLITAN EDISON
COMPANY, PENNSYLVANIA ELECTRIC COMPANY,
PENNSYLVANIA POWER COMPANY, AND WEST PENN
POWER COMPANY**

I. INTRODUCTION

Metropolitan Edison Company (“Met-Ed”), Pennsylvania Electric Company (“Penelec”), Pennsylvania Power Company (“Penn Power”), and West Penn Power Company (“West Penn”) (individually referred to as “Company” and collectively as the “Companies”) hereby file this Joint Petition with the Pennsylvania Public Utility Commission (“PUC” or “Commission”) requesting approval to modify their Supplier Master Agreement (“SMA”) to include a capacity proxy price (“CPP”) for PJM Interconnection LLC’s (“PJM”) 2022/2023 delivery year as part of the Companies’ upcoming default service auctions. For reasons that will be discussed further below, PJM is not expected to conduct a base residual auction (“BRA”) to determine the capacity price for the 2022/2023 delivery year before the Companies’ next default service auction, which is scheduled for October 26, 2020. This auction will include 24-month fixed-price products that extend into the 2022/2023 delivery year. This proposed change is necessary to promote a competitive solicitation for the Companies’ 24-month fixed-price products consistent with the Companies’ obligations to offer default service at the “least cost over time” through a “prudent mix” of default service products. The Companies respectfully request expedited approval of the

Joint Petition by no later than the Commission’s October 8, 2020 public meeting in order to provide timely notice to default service bidders in advance of the October 26, 2020 auction.

In support of this Joint Petition, the Companies state as follows:

II. BACKGROUND

1. Pursuant to the Electricity Generation Customer Choice and Competition Act (“Competition Act”), as amended by Act 129 of 2008, and the Commission’s regulations, the Companies are responsible to act as default service providers and procure default service supply for customers who choose not to shop for electricity from competitive electric generation suppliers.¹

2. As part of the Companies’ default service obligations, the Commission’s regulations require that the Companies offer default service at the “least cost over time,” which can be achieved by offering a “prudent mix” of default service products.²

3. Under the Companies’ currently-approved default service programs (“DSPs”), the Companies’ auction portfolio includes fixed-price products of 3, 12 and 24 months for residential and commercial customers and an hourly-priced product for industrial customers.³

4. The price for the fixed-price products is established through quarterly descending-price clock auctions. Winning bidders must fulfill the obligations imposed on a load serving entity by PJM including providing energy, capacity, Network Integration Transmission Service (“NITS”), and ancillary services, and also is responsible for all associated PJM administrative expenses.

¹ See 66 Pa.C.S. § 2801, *et seq.*; 52 Pa. Code §§ 54.181- 54.190.

² 52 Pa. Code § 54.186.

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-2017-2637855, P-2017-2637857, P-2017-2637858, and P-2017-2637866 (Opinion and Order entered Sept. 4, 2018).

5. Historically, the capacity price is determined by PJM for future years through the BRA process. As a result, the capacity component of default service suppliers' bids is known before the Companies' default service auctions, and there is no need for default service suppliers to add a risk premium to this component of the default service bid. This price certainty helps ensure that the Companies' default service pricing is "least cost over time" consistent with the Commission's regulations.⁴

6. On July 25, 2019, as part of a complaint proceeding involving a group of wholesale suppliers, the Federal Energy Regulatory Commission ("FERC") suspended the BRA for the 2022/2023 delivery year.⁵

7. Subsequently, on December 19, 2019, FERC issued an order expanding PJM's Minimum Offer Price Rule, which is subject to a number of requests for reconsideration and clarification that remain pending.⁶

8. On March 18, 2020, PJM submitted a proposed compliance filing consistent with FERC's December 19, 2019 Order, which, in relevant part, proposes an accelerated schedule for PJM's upcoming BRAs.

9. FERC has not yet ruled on PJM's March 2020 compliance filing and is under no statutory deadline to issue an order by a certain date. Thus, the Companies believe that it is highly unlikely that a BRA for the 2022/2023 delivery year will be held in advance of the Companies' October 26, 2020 auction.

10. Accordingly, the capacity price for the 2022/2023 delivery year will not be known by default service bidders at the time of the auction, which may result in bidders including a risk

⁴ 52 Pa. Code § 54.186.

⁵ *Calpine Corporation, et. al. v. PJM Interconnection, LLC*, 168 FERC ¶ 61,051 (2019).

⁶ *Calpine Corporation, et. al. v. PJM Interconnection, LLC*, 169 FERC ¶ 61,239 (2019).

premium within their bids for the Companies’ 24-month fixed products based on this pricing uncertainty. This uncertainty may cause other bidders to opt out of participating in the auction altogether due to the increased risk associated with an unknown capacity price.

11. To resolve this pricing uncertainty related to the Companies’ 24-month fixed products, the Companies are proposing to modify their SMA to include a capacity proxy price for the 2022/2023 delivery year in an effort to promote default service pricing that remains least cost over time.

III. PROPOSED MODIFICATIONS TO THE SUPPLIER MASTER AGREEMENT

12. The following chart illustrates the Companies’ proposed CPP by Company service territory for the 2022 to 2023 delivery year:

	2020/2021 Delivery Year. 3rd Incremental Auction. Final Zonal Net Load Price (\$/MW-day)	2021/2022 Delivery Year. 2nd Incremental Auction. Adjusted Zonal Net Load Price (\$/MW-day)	2022/2023 Capacity Proxy Price (\$/MW-day)
Met-Ed	\$87.06	\$142.71	\$114.89
Penelec	\$87.06	\$142.71	\$114.89
Penn Power (ATSI)	\$77.31	\$160.78	\$119.05
West Penn Power (APS)	\$77.31	\$142.71	\$110.01

13. The proposed CPP for each Company is the average of the capacity prices for 2020/2021 and 2021/2022, *i.e.*, the two years preceding the 2022/2023 delivery year. The most recent data available from PJM are used for the 2020/2021 and 2021/2022 delivery years.

14. The Companies strongly support the adoption of a CPP to resolve this unknown capacity price issue, which has been endorsed by commissions in a number of neighboring jurisdictions. The New Jersey Board of Public Utilities, Maryland Public Service Commission,

and the Public Utilities Commission of Ohio all approved the use of a CPP for their upcoming default service auctions.⁷

15. A CPP is the preferred methodology for addressing the unknown capacity price issue because it permits utilities to preserve their diverse auction portfolio of different fixed product lengths in order to offer the most competitive pricing to customers. This methodology is wholly consistent with the Commission's requirements to offer default service at the "least cost over time," which can be achieved by offering a "prudent mix" of default service products.⁸

16. In order to effectuate this change, the Companies' Independent Evaluator, CRA International, Inc. ("CRA"), is recommending the adoption of an Appendix H to the Companies' SMA reflecting this CPP methodology, which is attached hereto as Exhibit A.

17. CRA is also proposing limited changes to the Bidding Rules, which are attached hereto as Exhibit B. Commission approval of changes to the Bidding Rules is not required as long as the Commission approves the underlying change to the SMA.⁹

18. This filing has no impact on any other auction documents or any other component of the Companies' DSPs.

19. The Companies are proposing to use the proposed CPP for the upcoming default service auctions that include fixed 24-month products extending into the 2022/2023 delivery year,

⁷ *In the Matter of the Provision of Basic Generation Service (BGS) For the Period Beginning June 1, 2020*, Docket No. ER19040428 (Order entered Nov. 13, 2019); *In the Matter of the Commission's Investigation into Default Service for Type II Standard Offer Service Customers, et al.*, Case Nos. 9056 and 9064 (Order entered Apr. 15, 2020); *In the Matter of the Procurement of Standard Service Offer Generation As Part of the Fourth Electric Security Plan for Customers of Ohio Edison Company, The Cleveland Electric Illuminating Company, and The Toledo Edison Company, et al.*, Case Nos. 16-776-EL-UNC, *et al.* (Order entered Jul. 15, 2020).

⁸ 52 Pa. Code § 54.186.

⁹ See Bidding Rules, p. 1 ("These Bidding Rules may be modified from time to time by the Independent Evaluator in order to: (i) facilitate a more competitive auction process, (ii) make any necessary corrections and/or clarifications, (iii) account for any change in auction products, (iv) conform to any change in state or federal law or rule, and (v) apply any change deemed necessary at the discretion of the Independent Evaluator. All modifications will be posted to the Information Website and carried out in consultation with the Companies.").

specifically the Companies' October 2020, January 2021, and April 2021 auctions. Once the 2022/2023 capacity prices are determined at PJM, Appendix H will no longer be applicable.

20. The impact of the CPP on customers is neutral, *i.e.*, they will be charged the actual capacity price determined at PJM during the 2022/2023 delivery year. Winning default service suppliers of the Companies' 24-month fixed products will be paid the auction closing price for the load served subject to a subsequent true-up for the 2022/2023 delivery year. The true-up would be conducted as follows: if the actual PJM capacity price turns out to exceed the CPP, then the amount paid to default service suppliers will be increased by the difference (actual capacity price charged to them by PJM less the CPP); alternatively, if the actual PJM capacity price turns out to be less than the CPP, then the amount paid to suppliers will be reduced by the difference (the CPP less the actual PJM capacity charged to suppliers). The Companies will collect or credit their Price to Compare Default Service Rate Riders with the corresponding amounts.

21. The adoption of a CPP would promote competitive default service auctions for 24-month fixed products that extend into the 2022/2023 deliver year. If a CPP is not adopted, an increased risk exists that bidders will either include a risk premium as part of their bids for these products or opt not to participate in these auctions altogether. If the auction results are not competitive, the Commission may reject the results, which would result in the Companies being required to procure the remaining default service supply.

22. The Companies are aware that the Commission recently approved Duquesne Light Company's ("Duquesne") Petition to Modify its Default Service Plan, which shortened the products available in Duquesne's upcoming auction from 24 to 12 months to address this same

unknown capacity price issue.¹⁰ The Companies are proposing a different methodology here for a few reasons. First, the Companies seek to preserve the diverse auction portfolio including products of 3, 12, and 24 months approved in the Companies' most recent DSP proceeding.¹¹ Second, neighboring state commissions in New Jersey, Maryland, and Ohio conducted proceedings to evaluate the potential solutions for the unknown capacity price issue and approved a CPP approach.¹² The Companies seek to adopt an approach that aligns with their sister utilities in these jurisdictions.

23. The proposed CPP methodology is the optimal approach for resolving the unknown capacity price issue, because it permits the Companies to preserve their diverse default service auction portfolio, which is consistent with the Companies' regulatory obligation to maintain a "prudent mix" of default service supply contracts. Accordingly, the Companies request that the Commission approve Appendix H to the Companies' SMA.

IV. APPROVAL TIMEFRAME

24. The Companies seek to notify default service bidders regarding the CPP methodology at least two weeks before the October 26, 2020 auction. Accordingly, the Companies are requesting expedited approval of the Joint Petition by no later than the Commission's October 8, 2020 public meeting.

¹⁰ *Petition of Duquesne Light Company for Approval to Modify its Default Service Plan for the Period June 1, 2017, through May 31, 2021*, Docket No. P-2016-2543140 (Order entered July 16, 2020).

¹¹ 52 Pa. Code § 54.186.

¹² *In the Matter of the Provision of Basic Generation Service (BGS) For the Period Beginning June 1, 2020*, Docket No. ER19040428 (Order entered Nov. 13, 2019); *In the Matter of the Commission's Investigation into Default Service for Type II Standard Offer Service Customers, et al.*, Case Nos. 9056 and 9064 (Order entered Apr. 15, 2020); *In the Matter of the Procurement of Standard Service Offer Generation As Part of the Fourth Electric Security Plan for Customers of Ohio Edison Company, The Cleveland Electric Illuminating Company, and The Toledo Edison Company, et al.*, Case Nos. 16-776-EL-UNC, et al. (Order entered Jul. 15, 2020). The Public Utilities Commission of Ohio approved the use of a CPP as one of the options utilities could adopt to address the unknown capacity price issue.

V. MISCELLANEOUS

25. The Joint Petitioners' attorney in this matter is identified below. All correspondence, notices, documents, orders or other communications with respect to the above-captioned proceedings should be sent to Teresa K. Harrold at the address provided below.

26. As indicated on the attached Certificate of Service, a copy of the Joint Petition has been filed on all parties to the Companies' most recent DSP proceeding at Docket Nos. P-2017-2637855, P-2017-2637857, P-2017-2637858, and P-2017-2637866.

27. On August 7, 2020, a copy of this filing was emailed to all parties in the Companies' most recent DSP proceeding and the Companies made themselves available for any questions or discussion. In response, the Office of Consumer Advocate and NextEra Energy Marketing, LLC indicated their support for the Joint Petition. The Office of Small Business Advocate and the Bureau of Investigation and Enforcement affirmatively indicated that they do not oppose the Joint Petition. As of the date of this filing, no other party informed the Companies that they are intending to oppose the filing.

28. The Companies are posting a copy of this filing on their default service auction website.¹³ If the Commission approves this Joint Petition, the Companies will notify all prospective default service suppliers, revise the SMA and Bidding Rules, and update the default service auction website accordingly.

¹³ See www.fepaauction.com.

VI. CONCLUSION

As demonstrated in the foregoing Joint Petition, the Companies' proposed changes to the Supplier Master Agreement are consistent with the Competition Act, Act 129, and are in the public interest. This capacity proxy price approach encourages default service bidder participation and promotes a competitive solicitation process without added risk premiums. Moreover, this approach preserves a prudent mix of default service supply contracts while promoting least cost over time default service pricing. Accordingly, Metropolitan Edison Company, Pennsylvania Electric Company, Pennsylvania Power Company, and West Penn Power Company respectfully request expedited approval of the Joint Petition by no later than the Commission's October 8, 2020 public meeting.

Respectfully submitted,

Dated: August 19, 2020



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Counsel for:
Metropolitan Edison Company,
Pennsylvania Electric Company,
Pennsylvania Power Company, and
West Penn Power Company

EXHIBIT A

APPENDIX H – SUPPLEMENT¹

This Supplement to the Supplier Master Agreement (“SMA”) entered into as of [date], by and between _____ (the “Company”) and _____ (the DS Supplier) (together, the “Parties”) is effective as of the Effective Date of the SMA. Except as specifically modified in and by this Supplement, all terms and conditions of the SMA shall remain in full force and effect and shall apply to this Supplement.

For purposes of this Supplement: (i) the “PJM RPM Zonal Net Load Price” is the price charged by PJM to LSEs for capacity in the Company’s PJM zone under the Reliability Pricing Model (“RPM”) or its successor; and (ii) the “Capacity Proxy Price”(CPP) for the Company is \$_____/MW-day.

The Capacity Proxy Price for the 2022/2023 delivery year for each Company is set according to the values provided in the table below.

Capacity Proxy Price by Company for Energy Year 2022/2023

	2020/2021 Delivery Year. 3rd Incremental Auction. Final Zonal Net Load Price (\$/MW-day)	2021/2022 Delivery Year. 2nd Incremental Auction. Adjusted Zonal Net Load Price (\$/MW-day)	2022/2023 Capacity Proxy Price (\$/MW-day)
Met-Ed	\$87.06	\$142.71	\$114.89
Penelec	\$87.06	\$142.71	\$114.89
Penn Power (ATSI)	\$77.31	\$160.78	\$119.05
West Penn Power (APS)	\$77.31	\$142.71	\$110.01

Source: <https://www.pjm.com/markets-and-operations/rpm.aspx>

The CPP for each Company is the average of the capacity prices for 2020/2021 (Final Zonal Net Load Price) and 2021/2022 (Adjusted Zonal Net Load Price), i.e., the two years preceding the 2022/2023 delivery year. The most recent data available from PJM are used for the 2020/2021 and 2021/2022 delivery years.

This CPP is applicable to the Companies’ October 2020, January 2021, and April 2021 auctions, which include 24-month fixed-price products that extend into the 2022/2023 delivery year. However, this Appendix will not be applicable to any auctions after the capacity prices are determined at PJM for the 2022/2023 delivery year.

For and in consideration of the promises and mutual covenants contained herein, and for other good and valuable consideration, the receipt and sufficiency of which are hereby acknowledged, the Parties agree as follows:

Section 9.1 (a) of the SMA is replaced with the following:

Each Billing Month, the Company will prepare a Statement of amounts due to the DS Supplier. This Statement will show the aggregate amounts due based on the DS Fixed Price multiplied by the hourly Energy requirements of DS Supply used to determine the PMEA multiplied by the DS Fixed Percentage as shown on the Transaction Confirmation(s) for each hour of the Billing Month, plus the aggregate amounts

¹ This Appendix will no longer be applicable once the capacity prices are determined at PJM for the 2022/2023 delivery year.

EXHIBIT A

due based on the DS Variable Price multiplied by the hourly Energy requirements of DS Supply used to determine the PMEA multiplied by the DS Variable Percentage, if applicable, as shown on the Transaction Confirmation(s) for each hour of the Billing Month. For each Billing Month of Energy Year 2022/2023, an additional line item will show the difference between the PJM RPM Zonal Net Load Price actually charged for load served on the day for the Company's PJM zone and the Capacity Proxy Price multiplied by the Supplier Responsibility Share of the Company Capacity obligation (expressed in MW) for each day of the Billing Month in question.

Company

DS SUPPLIER

By: _____

By: _____

Name: _____

Name: _____

Title: _____

Title: _____

3.1 Prices Paid to Winning Suppliers in the Fixed-Price Auction

In accordance with the SMA, the Default Service Suppliers from the Fixed-Price Auction for residential customer load will be paid a price comprising a fixed price component and a variable price component while the Default Service Suppliers from the Fixed-Price Auction for commercial customer load will be paid a price comprising a fixed price component only. An additional line item (payment or credit) is added for the 2022/2023 Energy Year; See Appendix H, "Supplement," of the SMA.

- The residential fixed price component will be equal to 95 percent (95%) of the delivered supply each hour multiplied by the price established through the Companies' competitive procurement process. The residential variable price component will be equal to 5 percent (5%) of the delivered supply each hour multiplied by a "spot price." The "spot price" will be equal to the sum of:
 - (a) The real time hourly total locational marginal price ("LMP") established by PJM Interconnection L.L.C. ("PJM"), the Companies' regional transmission organization, for the PJM delivery point of the applicable Company (i.e., the PJM designated METED, PENELEC, Penn Power Aggregate, or APS Zone), plus
 - (b) An adder of \$20/MWh. This adder is designed to capture an estimate of costs of other supply components associated with meeting the full-requirements obligation, including capacity, ancillary services, NITS, AEPS compliance, and other costs.
- The commercial fixed price component will be equal to 100 percent (100%) of the delivered supply each hour multiplied by the price established through the Companies' competitive procurement process

3.2 Prices Paid to Winning Suppliers in the Hourly-Priced Auction

In accordance with the SMA, the Default Service Suppliers from the Hourly-Priced Auction will be paid a price comprising a fixed price component and a variable price component. An additional line item (payment or credit) is added for the 2022/2023 Energy Year; See Appendix H, "Supplement," of the SMA. The fixed price component will be equal to 100 percent (100%) of the delivered supply each hour multiplied by the price established through the Companies' competitive procurement process.

- The variable price component will be equal to 100 percent (100%) of the delivered supply each hour multiplied by a "spot price." The "spot price" will be equal to the sum of:
 - (a) The real time hourly total LMP established by PJM for the PJM delivery point of the applicable Company, plus
 - (b) An adder of \$4/MWh. This adder is designed to capture an estimate of costs of other supply components associated with meeting the full-requirements obligation, including capacity, ancillary services, NITS, AEPS compliance, and other costs.

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Joint Petition of Metropolitan Edison	:	
Company, Pennsylvania Electric Company,	:	Docket No. _____
Pennsylvania Power Company and West	:	Docket No. _____
Penn Power Company for Approval to	:	Docket No. _____
Modify Their Supplier Master Agreement	:	Docket No. _____

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true and correct copy of the foregoing document upon the individuals listed below, in accordance with the requirements of 52 Pa. Code § 1.54.

Service by electronic mail, as follows:

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Dated: August 19, 2020



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