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January 20, 2012

Via Hand Delivery

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor (filing room)
PO Box 3265
Harrisburg, PA 17105-3265

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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; Docket Nos. P-2011-2273650, P-2011-2273668, P-2011-2273669, and P-2011-2273670

Dear Secretary Chiavetta:

Please find enclosed for filing with the Pennsylvania Public Utility Commission an original and three (3) copies of a Petition to Intervene in the above-captioned matter on behalf of The Pennsylvania State University. Copies have been served in accordance with the attached Certificate of Service.

Should you have any questions or comments, please feel free to contact me directly.

Very truly yours,



Thomas J. Sniscak
William E. Lehman

Counsel for The Pennsylvania State University

TJS/bes/das

Enclosures

cc: Honorable Elizabeth H. Barnes, Administrative Law Judge
Per the 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 Company for Approval of Their Default Service Programs	:	Docket Nos.	P-2011-2273650
	:		P-2011-2273668
	:		P-2011-2273669
	:		P-2011-2273670

**PETITION TO INTERVENE OF
THE PENNSYLVANIA STATE UNIVERSITY**

NOW COMES The Pennsylvania State University (“PSU”), by and through its attorneys, Hawke McKeon & Sniscak LLP, and files this Petition to Intervene in the above-captioned proceeding before the Pennsylvania Public Utility Commission (“Commission”). In support of its Petition, PSU avers as follows:

1. On November 17, 2011, Metropolitan Edison Company (“Met-Ed”), Pennsylvania Electric Company (“Penelec”), Pennsylvania Power Company (“Penn Power”) and West Penn Power Company (“West Penn”) (collectively “FirstEnergy Companies”) filed a Joint Petition for Approval of their Default Service Implementation Programs pursuant to Section 2807(e) of the Public Utility Code. The Joint Petition is regarding default service rates to be charged starting June 1, 2013. A Motion to Consolidate was granted by Administrative Law Judge Elizabeth H. Barnes (“ALJ Barnes”) on December 29, 2011.

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2. All correspondence and pleadings in this docket should be directed to PSU's counsel in this matter:

Thomas J. Sniscak, Esquire
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3. Eligibility to intervene in Commission proceedings is governed by the Commission's regulations found at 52 Pa. Code § 5.72. The Commission's regulations provide that in order to have the ability to intervene, a party must have "a right or interest" sufficient to warrant intervention, which includes an interest that may be directly affected by the proceeding and which is not being adequately represented by existing participants, and where the petitioner may be bound by the actions of the Commission or where the right or interest is otherwise in the public interest. *Id.*

4. PSU has such an interest. PSU is a major generation, transmission and distribution service customer of West Penn at its University Park campus receiving service through West Penn's PA Retail Tariff 37. PSU is the only customer taking service under Tariff 37.

5. As a large customer, and a unique customer that takes service under its own tariff, PSU will be substantially and directly affected by any decision, final order, or settlement in this matter and will be bound thereby. Moreover, no other party can represent PSU's interest under these circumstances.

6. PSU's intervention will not delay or cause prejudice to any current party to this proceeding as PSU will take the proceeding as it stands and accepts the schedule and procedural rules set forth in the Amended Scheduling Order issued on December 29, 2011. PSU intends, at this

time, only to monitor the proceeding as to its effects on PSU's Tariff 37 or regarding any proposal by any other party that may impact PSU's rates and conditions of service. Furthermore, PSU has been informed by the FirstEnergy Companies that they will not oppose PSU's Petition to Intervene.

7. For the reasons stated above, PSU's intervention in this matter meets the intervention standards of 52 Pa. Code § 5.72, and is otherwise in the public interest. Accordingly, PSU requests that this intervention be granted and that it be allowed full party status in this matter.

8. If PSU were to file rebuttal testimony, its witness will be:

Jim Crist, Principal
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WHEREFORE, The Pennsylvania State University respectfully requests that the Pennsylvania Public Utility Commission grant it party status in the above-captioned matter.

Respectfully submitted by:



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*Counsel for
The Pennsylvania State University*

DATED: January 20, 2012

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).

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Thomas J. Sniscak
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Dated this 20th day of January 2012