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February 7, 2013

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

**VIA ELECTRONIC FILING**

**RE: Joint Petition of Metropolitan Edison Company, Pennsylvania Electric Company, Pennsylvania Power Company, and West Penn Power Company for Approval of Their Smart Meter Deployment Plan; Docket Nos. M-2013-2341990, M-2013-2341991, M-2013-2341993, and M-2013-2341994**

Dear Secretary Chiavetta:

Please find enclosed for filing with the Pennsylvania Public Utility Commission ("PUC" or "Commission") the Petition to Intervene on behalf of the Met-Ed Industrial Users Group, the Penelec Industrial Customer Alliance, the Penn Power Users Group, and the West Penn Power Industrial Intervenors, in the above-referenced proceeding.

As evidenced by the attached Certificate of Service, all parties to the proceeding are being duly served with a copy of this document. Thank you.

Sincerely,

McNEES WALLACE & NURICK LLC

By   
Teresa K. Schmittberger

Counsel to the Met-Ed Industrial Users Group,  
the Penelec Industrial Customer Alliance,  
the Penn Power Users Group, and  
the West Penn Power Industrial Intervenors

Enclosures

c: Administrative Law Judge Elizabeth H. Barnes (via E-mail and Hand Delivery)  
Certificate of Service

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## CERTIFICATE OF SERVICE

I hereby certify that I am this day serving a true copy of the foregoing document upon the participants listed below in accordance with the requirements of 52 Pa. Code Section 1.54 (relating to service by a participant).

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Penelec Industrial Customer Alliance, and  
Penn Power Users Group, and West Penn Power  
Industrial Intervenors

Dated this 7<sup>th</sup> day of February, 2013, at Harrisburg, Pennsylvania

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Joint Petition of Metropolitan Edison Company,	:	M-2013-2341990
Pennsylvania Electric Company, Pennsylvania	:	M-2013-2341991
Power Company, and West Penn Power Company	:	M-2013-2341993
for Approval of Their Smart Meter Deployment Plan	:	M-2013-2341994

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**JOINT PETITION TO INTERVENE OF  
THE MET-ED INDUSTRIAL USERS GROUP,  
THE PENELEC INDUSTRIAL CUSTOMER ALLIANCE,  
THE PENN POWER USERS GROUP, AND  
THE WEST PENN POWER INDUSTRIAL INTERVENORS**

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TO THE HONORABLE, THE PENNSYLVANIA PUBLIC UTILITY COMMISSION:

Pursuant to Sections 5.71 through 5.74 of the Pennsylvania Public Utility Commission's ("PUC" or "Commission") Regulations, 52 Pa. Code §§ 5.71-5.74, the Met-Ed Industrial Users Group ("MEIUG"), the Penelec Industrial Customer Alliance ("PICA"), the Penn Power Users Group ("PPUG"), and the West Penn Power Industrial Intervenors ("WPPII") (collectively, "Industrial Customer Groups") hereby file this Joint Petition to Intervene in the above-captioned proceeding. In support thereof, the Industrial Customer Groups assert the following:

1. The Industrial Customer Groups are MEIUG, PICA, PPUG, and WPPII. The compositions of MEIUG, PICA, PPUG, and WPPII are attached hereto as Appendix A, Appendix B, Appendix C, and Appendix D, respectively. MEIUG, PICA, PPUG, and WPPII reserve the right to modify these Appendices throughout the course of this proceeding, as necessary.

2. The names and address of the Industrial Customer Groups' attorneys are:

Susan E. Bruce (I.D. No. 80146)  
Charis Mincavage (I.D. No. 82039)  
Vasiliki Karandrikas (I.D. No. 89711)  
Teresa K. Schmittberger (I.D. No. 311082)  
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3. On August 14, 2009, pursuant to the requirements of Act 129 and the Commission's Implementation Order entered on June 24, 2009, at Docket No. M-2009-2092655 ("I.O."), the Metropolitan Edison Company ("Met-Ed"), the Pennsylvania Electric Company ("Penelec"), the Pennsylvania Power Company ("Penn Power"), and the West Penn Power Company ("West Penn") (collectively, the "Companies") filed their Act 129 Smart Meter Technology Procurement and Installment Plans ("SMPI Plan") with the Commission. The Commission approved Met-Ed's, Penelec's and Penn Power's SMPI Plans, with modifications, on June 9, 2010, and approved West Penn's SMPI Plan on June 30, 2011.

4. The I.O. granted Electric Distribution Companies ("EDCs") a 30-month grace period to design networks, select vendors, train personnel, and establish a smart meter deployment plan. On May 25, 2012, the Companies submitted a Petition to extend the grace period to December 31, 2012, to submit their smart meter deployment plan, indicating that the delay is due to the expected release of new smart meter technology in Summer 2012, and the need for sufficient time to test new technology and make any changes to the deployment plan. The Industrial Customer Groups did not object to the requested time extension. The

Commission granted the Companies' Petition on June 28, 2012, thereby extending the grace period to December 31, 2012, for the Companies to submit their smart meter deployment plan.

5. On December 31, 2012, the Companies jointly petitioned the Commission for approval of their Smart Meter Deployment Plan ("Deployment Plan" or "Plan"). Specifically, the Companies requested that the Commission: (1) find that the Deployment Plan satisfies the requirements of Act 129 and the I.O.; (2) approve the proposed procurement and deployment of approximately 2.1 million smart meters; (3) authorize recovery of smart meter costs through the Companies' Smart Meter Technologies Charge ("SMT-C") Riders, including an additional \$5.1 million for previous West Penn expenditures; and (4) authorize the Companies to create a regulatory asset for their meter stock that will be replaced by smart meters ("Legacy Meters"). *See* Deployment Plan, p. 1.

6. The Companies estimate that the total costs of the Deployment Plan's 20-year life cycle will be approximately \$1.258 billion. *See id.* at 9. To recover these costs, the Companies have each implemented a SMT-C Rider, and are not proposing any major changes to those Riders. *See id.*, p. 10. In regard to the Legacy Meters, the Companies propose to: (1) create a regulatory asset, with a recovery schedule equal to the remaining depreciable lives per the respective Company's Annual Depreciation Reports, and with continued recovery through base rates; and (2) include the cost of removal for these meters as a recoverable Operations and Maintenance ("O&M") expense in the SMT-C of each Company's SMT-C Rider. *See id.*, p. 10-11. In addition, West Penn proposes to recover an additional \$5.1 million through its SMT-C Rider for expenditures made to develop its SMPI Plan between 2009 and 2010, to be collected over the remaining amortization period ending on February 28, 2017. *See id.*, p. 11-12.

7. The Industrial Customer Groups are *ad hoc* associations of energy-intensive customers receiving electric service in the Companies' service territory. As some of the Companies' largest customers, whose manufacturing processes require significant amounts of electricity, any proposed modifications to the Companies' electric rates could significantly impact the Industrial Customer Groups' production costs.

8. The Industrial Customer Groups are concerned with issues regarding the terms and conditions of their electricity service, and, as a result, have been actively involved in numerous proceedings of the Companies, including participation in the adjudication of the Companies' SMPI Plan proceeding and regularly attending the Companies' SMPI Plan stakeholder meetings. The Commission's final disposition of the Companies' Deployment Plan also directly affects the rates that the Companies impose on the Industrial Customer Groups for electric service.

9. The Industrial Customer Groups thus have an interest in these proceedings that is not represented by any other party of record; consequently, the Industrial Customer Groups satisfy the standards for intervention under Section 5.72 of the Commission's regulations. 52 Pa. Code § 5.72.

**WHEREFORE**, the Met-Ed Industrial Users Group, the Penelec Industrial Customer Alliance, the Penn Power Users Group, and the West Penn Power Industrial Intervenors respectfully request that the Pennsylvania Public Utility Commission grant this Petition to Intervene and provide the Industrial Customer Groups with full party status in these proceedings.

Respectfully submitted,

McNEES WALLACE & NURICK LLC

By 

Susan E. Bruce (I.D. No. 80146)  
Charis Mincavage (I.D. No. 82039)  
Vasiliki Karandrikas (I.D. No. 89711)  
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Penn Power Users Group, and the West Penn  
Power Industrial Intervenors

Dated: February 7, 2013

**APPENDIX A**

**MET-ED INDUSTRIAL USERS GROUP**

Air Liquide Industrial U.S. LP  
Carpenter Technology Corporation  
Dixie Consumer Products, LLC, Lehigh Valley  
East Penn Manufacturing Company, Inc.  
Exide Technologies, Inc.  
Farmers Pride, Inc.  
Glen-Gery Corporation  
Harley-Davidson Motor Company – York Division  
Knouse Foods Cooperative, Inc.  
Magnesita Refractories Co.  
PPG Industries, Inc.  
RH Sheppard Co., Inc.  
Royal Green LLC  
Sweet Street Desserts, Inc.

## APPENDIX B

### PENELEC INDUSTRIAL CUSTOMER ALLIANCE

American Refining Group Inc.  
Appleton Papers Inc.  
E.I. du Pont de Nemours & Co., Inc.  
Electralloy, a G.O. Carlson, Inc., Co.  
Ellwood National Steel  
Erie Forge & Steel, Inc.  
Glen-Gery Corporation  
Indiana Regional Medical Center  
Pittsburgh Glass Works, L.L.C.  
Procter & Gamble Paper Products Company  
Sheetz, Inc.  
Standard Steel  
Team Ten, LLC - American Eagle Paper Mills  
The Plastek Group  
U.S. Silica Company  
Wegmans Food Markets, Inc.

**APPENDIX C**

**PENN POWER USERS GROUP**

Ellwood Quality Steel

**APPENDIX D**

**WEST PENN POWER INDUSTRIAL INTERVENORS**

Air Liquide Industrial U.S. LP  
Air Products & Chemicals, Inc.  
ATI Allegheny Ludlum Corporation  
Carpenter Technology Corporation/Latrobe Specialty Metals  
Ervin Industries  
INDSPEC Chemical Corporation  
Lehigh Specialty Melting Inc. (Whemco)  
MERSEN USA St Marys-PA Corp.  
World Kitchen LLC

