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November 25, 2015

*Via Electronic Filing*

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

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-2015-2511333, P-2015-2511351, P-2015-2511355 and P-2015-2511356; **PETITION TO INTERVENE**

Dear Secretary Chiavetta:

Enclosed you will find The Pennsylvania State University's Petition to Intervene in the above-captioned matters. 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  
Christopher M. Arfaa  
William E. Lehman

*Counsel for The Pennsylvania State University*

TJS/WEL/das

Enclosures

cc: Honorable David A. Salapa, Administrative Law Judge  
Per the Certificate of Service

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Petition of Metropolitan Edison Company for Approval of a Default Service Program for the Period Beginning June 1, 2017, through May 31, 2019	:	Docket Nos. P-2015-2511333
	:	
	:	
Petition of Pennsylvania Electric Company for Approval of a Default Service Program for the Period Beginning June 1, 2017, through May 31, 2019	:	P-2015-2511351
	:	
	:	
Petition of Pennsylvania Power Company for Approval of a Default Service Program for the Period Beginning June 1, 2017, through May 31, 2019	:	P-2015-2511355
	:	
	:	
Petition of West Penn Power Company for Approval of a Default Service Program for the Period Beginning June 1, 2017, through May 31, 2019	:	P-2015-2511356
	:	
	:	

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

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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 3, 2015, 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, 2017.

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

Thomas J. Sniscak, Esquire  
Christopher M. Arfaa, Esquire  
William E. Lehman, 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 38. PSU is the only customer taking service under Tariff 38.

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 intends, at this time, only to monitor the proceeding as to its effects on PSU's Tariff 38 or regarding any proposal by any other party that may impact PSU's rates and conditions of service.

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 testimony, its witness will be:

Jim Crist, Principal  
Lumen Group  
Suite 101  
4226 Yarmouth Drive  
Allison Park, PA 15101  
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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: November 25, 2015

## 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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Dated this 25<sup>th</sup> day of November, 2015