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November 25, 2015

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 Default Service Programs; Dockets No. P-2015-2511333, P-2015-2511351, P-2015-2511355, P-2015-2511356

Dear Secretary Chiavetta:

Please find enclosed for filing with the Pennsylvania Public Utility Commission the Joint Petition to Intervene of the Med-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, the "Industrials"), in the above-referenced proceedings.

As shown by the attached Certificate of Service, all parties to these proceedings are being duly served.

Very truly yours,

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

/leh

Enclosures

c: Administrative Law Judge David A. Salapa (via e-mail and First-Class Mail)
Certificate of Service

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**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-2015-2511333
	:	:	P-2015-2511351
	:	:	P-2015-2511355
	:	:	P-2015-2511356

**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**

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, the "Industrials") hereby file this Petition to Intervene in the above-captioned proceeding. In support of their Petition to Intervene, the Industrials assert as follows:

1. The Industrials are *ad hoc* associations of energy-intensive commercial and industrial customers receiving electric service in Met-Ed's, Penelec's, Penn Power's, and West Penn Power's service territories. The Industrials have been active in many Commission proceedings addressing the terms and conditions of Metropolitan Edison Company's ("Met-Ed"), Pennsylvania Electric Company's ("Penelec"), Pennsylvania Power Company's ("Penn Power"), and West Penn Power Company's ("West Penn") (collectively, "Companies") service.

2. The Industrials consume substantial amounts of electricity on an annual basis. MEIUG members receive service under Met-Ed's GS-Large, GP, and TP rate schedules; PICA members receive service under Penelec's GS-Large, GP, and LP rate schedules; PPUG members

receive service under Penn Power's GT rate schedule; and WPPII members receive service under West Penn Power's rate schedules 30, 35, 40, 41, 44, and 46. For purposes of this proceeding, MEIUG, PICA, PPUG, and WPPII membership is listed on the attached Appendices A, B, C, and D, respectively. MEIUG, PICA, PPUG, and WPPII will update the appendices as needed during the course of this proceeding to reflect changes in membership.

3. The names and address of attorneys for the Industrials are:

Susan E. Bruce (Pa. I.D. No. 80146)
Charis Mincavage (Pa. I.D. No. 82039)
Vasiliki Karandrikas (Pa. I.D. No. 89711)
Teresa K. Schmittberger (Pa. I.D. No. 311082)
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The Industrials request that the names and address of their attorneys be added to the Commission's and all parties' service lists.

4. On November 3, 2015, the Companies petitioned the Pennsylvania Public Utility Commission ("PUC" or "Commission") for approval of a proposed plan for the terms and conditions under which the Companies would supply default service from June 1, 2017, through May 31, 2019.¹ The proposed default service plans ("DSP") also includes components that would apply to all retail customers in the Companies' service territories, regardless of whether they receive default service.

¹ *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, *et al.* (Nov. 3, 2015) ("Joint Petition" or "DSP IV").

5. As users of substantial volumes of electricity in the Companies' service territories, the Industrials are directly impacted by changes to the terms and conditions of their electricity service, and thus, are profoundly concerned with the resolution of the Companies' proposed DSP. The Commission's final disposition of the Companies' DSP will directly affect the rates that the Companies impose on the Industrials, whether or not they receive default service. In addition, other parties' recommendations could adversely impact the Industrials. As some of the Companies' largest customers, the Industrials are in a unique position to address the effect of the Companies' proposed DSP on Large Commercial and Industrial customers.

6. The Industrials have an interest in this proceeding that is not represented by any other party of record. Thus, the Industrials satisfy the standards for intervention under Section 5.72 of the Commission's Regulations. 52 Pa. Code § 5.72. Accordingly, the Industrials should be granted intervenor status in this proceeding.

WHEREFORE, for the reasons stated above, 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:

- (1) Grant this Petition to Intervene, providing the Met-Ed Industrial Users Group, the Penelec Industrial Customer Alliance, the Penn Power Users Group, and the West Penn Power Industrial Intervenors with full-party status in this proceeding; and
- (2) Provide other such relief as it deems necessary.

Respectfully submitted,

McNEES WALLACE & NURICK LLC

By 

Susan E. Bruce (Pa. I.D. No. 80146)
Charis Mincavage (Pa. I.D. No. 82039)
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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

Dated: November 25, 2015

APPENDIX A

MET-ED INDUSTRIAL USERS GROUP

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

APPENDIX B

PENELEC INDUSTRIAL CUSTOMER ALLIANCE

American Refining Group Inc.
Appvion, 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.
Sheetz, Inc.
Standard Steel
Team Ten, LLC – American Eagle Paper Mills
The Plastek Group, Inc.
The Procter & Gamble Paper Products Company
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.

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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the West Penn Power Industrial Intervenors

Dated this 25th day of November, 2015, at Harrisburg, Pennsylvania