

COMMONWEALTH OF PENNSYLVANIA



OFFICE OF CONSUMER ADVOCATE

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December 10, 2015

Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street  
Harrisburg, PA 17105-3265

Re: Petition of West Penn Power Company for  
Approval of its Act 129 Phase III Energy  
Efficiency and Conservation Plan  
Docket No. M-2015-2514772

Dear Secretary Chiavetta:

Enclosed please find the Office of Consumer Advocate's Notice of Intervention and Public Statement in the above-referenced proceeding.

Copies have been served as indicated on the enclosed Certificate of Service.

Sincerely,

A handwritten signature in cursive script that reads "Christy M. Appleby".

Christy M. Appleby  
Assistant Consumer Advocate  
PA Attorney I.D. # 85824

Enclosures

cc: Office of Administrative Law Judge  
Office of Special Assistants  
Certificate of Service

214884

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Joint Petition for Consolidation of Proceedings and :  
Approval of Energy Efficiency and :  
Conservation Plans Phase III : Docket No. M-2015-2514772  
Metropolitan Edison Company, Pennsylvania :  
Electric Company, Pennsylvania :  
Power Company and West Penn Power Company :

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NOTICE OF INTERVENTION

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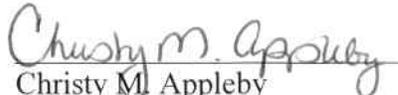
Pursuant to 52 Pa. Code 5.71-5.74, the Office of Consumer Advocate hereby gives its Notice of Intervention in the above-captioned proceeding. A copy of all correspondence and notices, documents, orders or other communications with respect to the above-captioned proceeding should be addressed to the following:

Christy M. Appleby  
Assistant Consumer Advocate  
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Respectfully submitted,

  
Christy M. Appleby  
Assistant Consumer Advocate  
PA. Attorney I.D. # 85824

DATE: December 10, 2015

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PUBLIC STATEMENT OF THE OFFICE OF CONSUMER ADVOCATE  
PURSUANT TO 71 P.S. SECTION 309-4(e)

Act 161 of the Pennsylvania General Assembly, 71 P.S. Section 309-2, as enacted July 9, 1976, authorizes the Consumer Advocate to represent the interests of consumers before the Pennsylvania Public Utility Commission (Commission). In accordance with Act 161, and for the following reasons, the Consumer Advocate determined to intervene and participate in the Joint Petition for Consolidation of Proceedings and Approval of Energy Efficiency and Conservation Plans (EE&C Plan) Phase III of Metropolitan Edison Company, Pennsylvania Electric Company, Pennsylvania Power Company and West Penn Power Company (Joint Petition).

On November 23, 2015, West Penn Power Company (West Penn or Company) filed the Joint Petition, pursuant to Section 2806.1 of the Public Utility Code and pursuant to the Implementation Order entered by the Commission at Docket No. M-2014-2424864 on June 19, 2015. The five-year cost of the Company's EE&C Phase III Plan is projected to be \$117,813,010. West Penn EE&C Plan at 17. The Company plans to reduce annual energy consumption by 569,684 MWh and to reduce demand by 64 MW by May 31, 2021. West Penn Power EE&C Plan at App. E, Table 2. With respect to residential customers, West Penn has proposed the following four residential customer energy efficiency programs: (1) Appliance Turn-In Program; (2) Home Performance Program; (3) Efficient Products Program; and (4) Low-Income Energy Efficiency Program. Id.

The Acting Consumer Advocate determined to intervene in this proceeding to protect the interests of Met-Ed's customers; to ensure that the proposed Plan and programs are in accordance with Act 129 and all other applicable statutes, regulations, and Commission Orders; and to ensure that any increase in rates resulting from the adoption of the proposed programs and any related expenses are just and reasonable.

CERTIFICATE OF SERVICE

Petition of West Penn Power Company : Docket No. M-2015-2514772  
For Approval of its Act 129 Phase III :  
Energy Efficiency and Conservation Plan :

I hereby certify that I have this day served a true copy of the foregoing, the Office of Consumer Advocate's Notice of Intervention and Public Statement, upon parties of record in this proceeding in accordance with the requirements of 52 Pa. Code Section 1.54 (relating to service by a participant), in the manner and upon the persons listed below:

Dated this 10th day of December 2015.

SERVICE BY E-MAIL and INTEROFFICE MAIL

Johnnie Simms, Esq.  
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Pa. Public Utility Commission  
Commonwealth Keystone Building  
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SERVICE BY E-MAIL and FIRST CLASS MAIL

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