



COMMONWEALTH OF PENNSYLVANIA

December 18, 2015

E-FILED

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

Re: Joint Petition for Consolidation of Proceedings and Approval of Act 129 Phase III EE&C Plans of Metropolitan Edison Company, Pennsylvania Electric Company, Pennsylvania Power Company, and West Penn Power Company - Docket Nos. M-2015-2514767, M-2015-2514768, M-2015-2514769, and M-2015-2514772

Dear Secretary Chiavetta:

I am delivering for filing today the original of the Notice of Intervention, Public Statement, and Notice of Appearance, on behalf of the Office of Small Business Advocate, in each of the above-captioned proceedings.

Copies have been served today on all known parties in these proceedings. A Certificate of Service to that effect is also enclosed.

If you have any questions, please do not hesitate to contact me.

Sincerely,

A handwritten signature in cursive script that reads "Elizabeth Rose Triscari".

Elizabeth Rose Triscari
Deputy Small Business Advocate
Attorney ID No. 306921

Enclosures

cc: The Honorable Elizabeth H. Barnes
The Honorable Steven K. Haas
Mr. Robert Knecht
Parties of Record

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Joint Petition for Consolidation of Proceedings	:	Docket Nos.	M-2015-2514767
and Approval of Energy Efficiency and	:		M-2015-2514768
Conservation Plans Phase III of Metropolitan	:		M-2015-2514769
Edison Company, Pennsylvania Electric	:		M-2015-2514772
Company, Pennsylvania Power Company, and	:		
West Penn Power Company	:		

**NOTICE OF INTERVENTION
OF THE SMALL BUSINESS ADVOCATE**

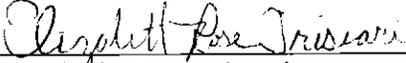
The Office of Small Business Advocate (“OSBA”) files this Notice of Intervention in the above-captioned proceeding before the Pennsylvania Public Utility Commission (“Commission”). Metropolitan Edison Company (“Met-Ed”), Pennsylvania Electric Company (“Penelec”), Pennsylvania Power Company (“Penn Power”), and West Penn Power Company (“West Penn”) (collectively, “First Energy” or “the Companies”) initiated the proceeding by filing a Joint Petition for Consolidation of Proceedings and Approval of Energy Efficiency and Conservation Plans Phase III on November 30, 2015. In support of this Notice of Intervention, the OSBA avers as follows:

1. The OSBA is an agency of the Commonwealth of Pennsylvania authorized by the Small Business Advocate Act (Act 181 of 1988, 73 P.S. §§ 399.41 - 399.50) to represent the interest of small business consumers as a party in proceedings before the Commission.

2. Representing the OSBA in this proceeding is:

Elizabeth Rose Triscari
Deputy Small Business Advocate
Office of Small Business Advocate
300 North Second Street, Suite 202
Harrisburg, Pennsylvania 17101
(717) 783-2525
(717) 783-2831 (fax)
etriscari@pa.gov

Respectfully submitted,


Elizabeth Rose Triscari
Deputy Small Business Advocate
Attorney ID No. 306921

Office of Small Business Advocate
300 North Second Street, Suite 202
Harrisburg, PA 17101
(717) 783-2525
(717) 783-2831 (fax)

Dated: December 18, 2015

approximately \$124,334,470. It is designed to reduce annual consumption by 622,126 MWh and reduce demand by 49 MWh by May 31, 2021. The cost of the Penelec Phase III Plan over five years is projected to be approximately \$114,873,710. It is designed to reduce annual consumption by 587,742 MWh by May 31, 2021. Penelec was not required to and did not propose a demand response program. The cost of the Penn Power Phase III Plan over five years is projected to be approximately \$33,298,945. It is designed to reduce annual consumption by 161,622 MWh and reduce demand by 17 MWh by May 31, 2021. The cost of the West Penn Phase III Plan over five years is projected to be approximately \$117,813,010. It is designed to reduce annual consumption by 569,684 MWh and reduce demand by 64 MWh by May 31, 2021.

The Small Business Advocate is intervening in the above-captioned proceeding in order to protect the interests of the Companies' small business customers. A thorough inquiry by the Commission into all of the elements of the Companies' petition is necessary to ensure that each of the Companies' proposed Phase III Plans are in accord with Act 129 of the Public Utility Code, all other applicable statutes, and Commission regulations and orders.

In view of the foregoing, the Small Business Advocate is requesting that the Joint Petition be subject to investigation and evidentiary hearings before the Commission. The Small Business Advocate will ask the Commission to deny or modify any aspect of the Companies' proposed Phase III Plans that are not proven by the Companies to be in accord with the Public Utility Code and would result in rates that are not just and reasonable.

Dated: December 18, 2015

**BEFORE THE PENNSYLVANIA
PUBLIC UTILITY COMMISSION**

Joint Petition for Consolidation of	:	
Proceedings and Approval of Energy	:	
Efficiency and Conservation Plans	:	Docket No. M-2015-2514767
Phase III of Metropolitan Edison	:	M-2015-2514768
Company, Pennsylvania Electric	:	M-2015-2514769
Company, Pennsylvania Power Company	:	M-2015-2514772
and West Penn Power Company	:	

CERTIFICATE OF SERVICE

I hereby certify that true and correct copies of the foregoing have been served via email and/or first-class mail (unless other noted below) upon the following persons, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant)

The Honorable Elizabeth H. Barnes
Administrative Law Judge
PA Public Utility Commission
400 North Street, 2nd Floor West
Commonwealth Keystone Building
Harrisburg, PA 17120
ebarnes@pa.gov
(E-mail and Hand Delivery)

Johnnie E. Simms, Esquire
Director and Chief Prosecutor
Bureau of Investigation & Enforcement
Commonwealth Keystone Building
400 North Street, 2nd Floor West
Harrisburg, PA 17105-3265
josimms@pa.gov
(E-mail and Hand Delivery)

The Honorable Steven K. Haas
Administrative Law Judge
PA Public Utility Commission
400 North Street, 2nd Floor West
Commonwealth Keystone Building
Harrisburg, PA 17120
sthaas@pa.gov
(E-mail and Hand Delivery)

Kathy J. Kolich, Esquire
Kolich & Associates, LLC
1521 Hightower Drive
Uniontown, OH 44685
kjklaw@yahoo.com

Christy M. Appleby, Esquire
Darryl Lawrence, Esquire
Office of Consumer Advocate
555 Walnut Street - 5th Floor
Harrisburg, PA 17101-1923
cappleby@paoca.org
dlawrence@paoca.org
(E-mail and Hand Delivery)

John L. Munsch, Esquire
FirstEnergy Service Company
800 Cabin Hill Drive
Greensburg, PA 15601
jmunsch@firstenergycorp.com

Thomas J. Sniscak, Esquire
William E. Lehman, Esquire
Hawke McKeon & Sniscak, LLP
P. O. Box 1778
Harrisburg, PA 17105-1778
tjsniscak@hmslegal.com

DATE: December 18, 2015


Elizabeth Rose Triscari
Deputy Small Business Advocate
Attorney ID No. 306921