

January 8, 2016

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

Re: Petition of Metropolitan Edison Utilities Corporation; Pennsylvania Electric Company; West Penn Power Company; Pennsylvania Power Company for Approval of its Act 129 Phase III Energy Efficiency and Conservation Plan.

Docket No: M-2015-2514767

Docket No: M-2015-2514768

Docket No.: M-2015-2514772

Docket No.: M-2015-2514769

Dear Secretary Chiavetta:

Please find attached for filing with the Pennsylvania Public Utility Commission ("PUC" or "Commission") the **Petition to Intervene of EnerNOC**, in the above-referenced matter.

This document was filed electronically with the Commission on this date. All parties are being served a copy of this document in accordance with the enclosed Certificate of Service.

Please contact me if you have any questions concerning this filing.

Sincerely,

TUCKER ARENSBERG, PC

By: 
Kevin L. Hall, Esquire

KLH/sed

Enclosure

cc: Administrative Law Judge Elizabeth H. Barnes (via E-mail and First Class Mail)
Administrative Law Judge Steven K. Haas (via E-mail and First Class Mail)
Certificate of Service

HBGDB:155102-1 030489-169654

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**Joint Petition for Consolidation of
Proceedings And Approval of Energy
Efficiency and Conservations Plans Phase
III of Metropolitan Edison Company,
Pennsylvania Electric Company,
Pennsylvania Power Company Plan And
West Penn Power Company**

**DOCKET NO. M-2015-2514767
DOCKET NO. M-2015-2514768
DOCKET NO. M-2015-2514769
DOCKET NO. M-2015-2514772**

**PETITION TO INTERVENE OF
EnerNOC, Inc.**

TO THE HONORABLE PENNSYLVANIA PUBLIC UTILITY COMMISSION:

Pursuant to 52 Pa. Code Sections 5.71 through 5.74, EnerNoc, Inc. ("EnerNoc"), hereby files this Petition to Intervene in the above-captioned proceeding. In support thereof, EnerNOC states as follows:

1. Petitioner is EnerNOC, Inc., with an address of P.O. Box 29492, Columbus, Ohio, 43229.

2. The name and address of Petitioner's attorneys are:

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Scott H. Debroff, Esquire
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3. On November 23, 2015, Metropolitan Edison Company, Pennsylvania Electric Company, Pennsylvania Power Company and West Penn Power Company ("Companies"), filed with the Pennsylvania Public Utility Commission ("PUC" or "Commission") a Petition for approval of the Company's Phase III Energy Efficiency and Conservation ("EE&C") Plan ("Phase III Plan" or "Plan"), pursuant to the requirements of Act 129 of 2008, 66 Pa. C.S. 2806.1 ("Act 129") at Docket No. M-2015-2514767; Docket No. M-2015-2514768; Docket No. M-2015-2514769; Docket No. M-2015-2514772.

4. EnerNOC provides demand response and energy efficiency programs to Pennsylvania retail customers. EnerNOC has an interest in advocating for equal opportunities for demand response providers to participate in the procurement of electric services, including in the service territory of the Companies.

5. The Commission's final determination in these proceedings may directly impact the business of EnerNOC and its ability to provide demand response and energy efficiency programs in Pennsylvania and in the Companies' service territory. EnerNOC therefore has a direct, substantial, and unique interest in the outcome of these proceedings that is not and cannot be adequately represented by any other party. See 52 Pa. Code § 5.72(a)(2). Therefore, EnerNOC respectfully requests that the Commission grant this Petition to Intervene and provide EnerNOC with full party status in these proceedings.

WHEREFORE, EnerNOC, Inc. requests that the Commission grant this Petition to Intervene and provide EnerNOC with full party status in this proceeding.

Respectfully submitted,



Kevin L. Hall, Esq.

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Scott H. Debroff, Esq.

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Dated: January 8, 2016

HBGDB:155122-1 030489-169654

VERIFICATION

I, Gregory Poulos, of EnerNOC, Inc., hereby state that the facts set forth in the foregoing Petition to Intervene of EnerNOC, Inc., are true and correct to the best of my knowledge, information, and belief. I understand that the statements made herein are made subject to 18 Pa.C.S. § 4904 (pertaining to unsworn falsification to authorities).

Date: January 7, 2016


Gregory Poulos

HBGDB:155114-1 030489-169653

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**Joint Petition for Consolidation of
Proceedings And Approval of Energy
Efficiency and Conservations Plans Phase
III of Metropolitan Edison Company,
Pennsylvania Electric Company,
Pennsylvania Power Company Plan And
West Penn Power Company**

**DOCKET NO. M-2015-2514767
DOCKET NO. M-2015-2514768
DOCKET NO. M-2015-2514769
DOCKET NO. M-2015-2514772**

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the foregoing Petition to Intervene upon the following parties to this proceeding in accordance with the requirements of 52 Pa. Code

§ 1.54 (relating to service by participant).

VIA E-MAIL & FIRST-CLASS MAIL

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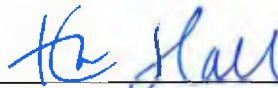
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Respectfully Submitted,

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