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January 26, 2016

VIA ELECTRONIC FILING

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor North
P.O. Box 3265
Harrisburg, PA 17105-3265

Re: Petition of PPL Electric Utilities Corporation for Approval of its Act 129 Phase III Energy Efficiency and Conservation Plan - Docket No. M-2015-2515642

Dear Secretary Chiavetta:

Enclosed for filing is the Motion of PPL Electric Utilities Corporation to Strike Certain Portions of the Direct Testimony of the PP&L Industrial Customer Alliance in the above-referenced proceeding. Copies will be provided as indicated on the Certificate of Service.

Respectfully submitted,



Devin Ryan

DTR/jl
Enclosures

cc: Honorable Susan D. Colwell
Certificate of Service

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been served upon the following persons, in the manner indicated, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

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Date: January 26, 2016



Devin T. Ryan

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of PPL Electric Utilities Corporation for :
Approval of its Act 129 Phase III Energy : Docket No. M-2015-2515642
Efficiency and Conservation Plan :

NOTICE TO PLEAD

YOU ARE HEREBY ADVISED THAT, PURSUANT TO 52 PA. CODE § 5.103(c), ANSWERS TO MOTIONS ARE DUE WITHIN TWENTY (20) DAYS AFTER THE DATE OF SERVICE. YOUR ANSWERS SHOULD BE FILED WITH THE SECRETARY OF THE PENNSYLVANIA PUBLIC UTILITY COMMISSION, P.O. BOX 3265, HARRISBURG, PA 17105-3265. A COPY SHOULD ALSO BE SERVED ON THE UNDERSIGNED COUNSEL.

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Of Counsel:

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Date: January 26, 2016



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Attorneys for PPL Electric Utilities Corporation

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of PPL Electric Utilities Corporation for :
Approval of its Act 129 Phase III Energy : Docket No. M-2015-2515642
Efficiency and Conservation Plan :

**MOTION OF PPL ELECTRIC UTILITIES CORPORATION
TO STRIKE CERTAIN PORTIONS OF THE DIRECT TESTIMONY OF
THE PP&L INDUSTRIAL CUSTOMER ALLIANCE**

TO ADMINISTRATIVE LAW JUDGE SUSAN D. COLWELL:

Pursuant to Section 5.103 of the Pennsylvania Public Utility Commission's ("Commission") regulations, 52 Pa. Code § 5.103, PPL Electric Utilities Corporation ("PPL Electric" or the "Company") files this Motion to Strike Certain Portions of the Direct Testimony of the PP&L Industrial Customer Alliance ("PPLICA"). This direct testimony raises issues regarding the Total Resource Cost ("TRC") methodology adopted by the Commission at Docket No. M-2015-2468992 and recommends changes to PPL Electric's Phase III Energy Efficiency and Conservation Plan ("Phase III EE&C Plan") based upon these issues. These portions of PPLICA's direct testimony should be stricken because they: (1) present issues and recommendations that are outside the scope of this proceeding; and (2) raise issues of statewide application and importance that have not been raised in any other electric distribution company's ("EDC") Phase III EE&C Plan proceeding.

In support of this Motion, PPL Electric states as follows:

I. BACKGROUND

1. On November 30, 2015, PPL Electric filed a petition for approval of its Phase III EE&C Plan.

2. On December 4, 2015, PPL Electric filed the written direct testimony of Peter Cleff, Hossein Haeri, and Bethany Johnson in support of its Phase III EE&C Plan.

3. On January 4, 2016, PPLICA filed an Answer and Petition to Intervene in the above-captioned proceeding.

4. By Scheduling Order dated January 7, 2016, Administrative Law Judge Susan D. Colwell (the "ALJ") granted PPLICA's Petition to Intervene.

5. On January 12, 2016, PPLICA served the written direct testimony of Michael K. Messer (PPLICA Statement No. 1) in accordance with the Scheduling Order.

II. MOTION TO STRIKE

A. PPLICA'S TRC ISSUES ARE OUTSIDE THE SCOPE OF THIS PROCEEDING AND WOULD VIOLATE OTHER EDCS' DUE PROCESS

6. PPLICA's direct testimony raises several issues concerning the Commission's TRC test. Specifically, PPLICA challenges the use of forecasted avoided energy costs in the TRC calculations and proposes that the Commission require PPL Electric to true-up its calculations using actual avoided energy costs. (PPLICA Statement No. 1 page 5, lines 10-11; page 5, line 17 to page 8, line 19.) Moreover, PPLICA avers that PPL Electric must monitor and report the actual benefits of its measures using the trued-up TRC values, even though PPLICA recognizes that "the Commission does not require PPL or other EDCs" to do so. (PPLICA Statement No. 1, page 8, lines 15-19.) Finally, PPLICA proposes that as part of the annual reconciliation process, the Commission should terminate programs for which Large Commercial

and Industrial (“Large C&I”) customers are eligible¹ with a TRC value below 1.0 over a 12-month period using “actual market prices, not projections.” (PPLICA Statement No. 1, page 11, lines 17-20.)

7. PPLICA’s issues are outside the scope of this proceeding. Any issues regarding the Commission’s TRC test should have been raised at Docket No. M-2015-2468992, where the Commission received comments on the development of the TRC methodology to be used in the EDCs’ Phase III EE&C Plans. Indeed, PPLICA proposes that actual avoided energy costs be used while admitting “that the PUC previously indicated that the projections should be used” and assuming that PPL Electric followed the Commission’s TRC procedures. (PPLICA Statement No. 1, page 5, lines 2-3, 20); *see 2016 Total Resource Cost (TRC) Test*, Docket No. M-2015-2468992, at pp. 26-27 (Order Entered June 22, 2015) (“*2016 TRC Test Order*”).

8. PPLICA had a full opportunity to raise its concerns about the TRC test, including the use of forecasted avoided energy costs, by submitting comments at Docket No. M-2015-2468992. *See 2016 Total Resource Cost (TRC) Test*, Docket No. M-2015-2468992 (Tentative Order Entered Mar. 11, 2015) (“*Tentative 2016 TRC Test Order*”); *see also 2016 TRC Test Order*. PPLICA, along with other industrial customer groups, submitted reply comments regarding the *Tentative 2016 TRC Test Order*. (See Attachment B.) Nothing in those reply comments challenged or even addressed the use of forecasted avoided energy costs in the TRC test, monitoring and reporting actual benefits of measures using a tried-up TRC test, or the annual elimination of programs that fall below a TRC value of 1.0 on an actual avoided energy cost basis. *See id.*

¹ In discovery, PPLICA clarified that its proposal relates to programs for which Large C&I customers are eligible, with the exception of pilot programs. (See Attachment A.) In PPL Electric’s Phase III EE&C Plan, this encompasses the Efficient Equipment, Custom, and Demand Response Programs. See Table 1 of the Phase III EE&C Plan. These programs are also available to the Small Commercial and Industrial (“Small C&I”) and Government/Nonprofit/Educational (“GNE”) customer sectors. See Sections 3.3 to 3.5 of the Phase III EE&C Plan.

9. Now, PPLICA seeks to collaterally attack the *2016 TRC Test Order* through PPL Electric's Phase III EE&C Plan proceeding. For example, concerning the avoided costs used by PPL Electric, PPLICA claims that the use of forecasted avoided energy costs results in overstated TRC values. (PPLICA Statement No. 1, page 8, lines 4-8.) Although PPLICA may disagree with the avoided energy costs used in the Commission's TRC test, it should have raised those concerns in the proper proceeding at Docket No. M-2015-2468992. PPL Electric must comply with the terms of the *2016 TRC Test Order*, and PPLICA should not be permitted to undermine the Commission by raising these TRC issues in PPL Electric's Phase III EE&C Plan proceeding. Thus, PPLICA's attempt to raise these TRC issues as part of PPL Electric's Phase III EE&C Plan proceeding is improper.

10. In addition, PPLICA's proposal to use actual avoided energy costs potentially would affect all other EDCs in Pennsylvania, who are not parties to this proceeding. Indeed, PPLICA's proposal is one of statewide application and importance. To PPL Electric's knowledge, no party has raised PPLICA's issues with forecasted avoided energy costs in any other Phase III EE&C Plan proceeding. Consequently, adopting PPLICA's recommendation would deprive the other EDCs of due process. All EDCs and other stakeholders should have the opportunity to respond to PPLICA's recommendation, which they would have had if PPLICA properly submitted comments on this issue at Docket No. M-2015-2468992.

11. Moreover, even if PPLICA's proposal were limited to PPL Electric, it would be fundamentally unfair, poor public policy, and an abuse of discretion. The result would be one TRC methodology for PPL Electric and another one for all other EDCs. Effectively, PPL Electric would be singled out by the Commission to use one TRC methodology for its calculations (which in the mind of PPLICA results in lower TRC values), while all other EDCs

use a different TRC methodology. Considering that all EDCs must deliver their EE&C Plans in a cost-effective manner under Act 129, there should not be different cost-effectiveness standards for different EDCs. *See* 66 Pa. C.S. § 2806.1(a). Furthermore, limiting PPLICA's proposal to PPL Electric would create a lack of uniformity in the EDCs' reporting, thereby creating confusion for the Commission, the Statewide Evaluator, and stakeholders evaluating the EDCs' progress in Phase III. Thus, PPLICA's proposal would be fundamentally unfair, poor public policy, and an abuse of discretion even if it were limited to PPL Electric.

12. Further, PPLICA fails to recognize that the Commission directed EDCs to use the TRC methodology adopted in the *2016 TRC Test Order* for Phase III. *2016 TRC Test Order*, at p. 7. Accordingly, PPL Electric developed and filed its Phase III EE&C Plan using that TRC methodology. PPLICA's proposals to use actual avoided energy costs and to annually terminate programs for which Large C&I customers are eligible that have a TRC value below 1.0 over a 12-month period would fundamentally change PPL Electric's Phase III EE&C Plan. PPLICA's proposals would necessitate thoroughly analyzing the programs' cost-effectiveness using actual avoided energy costs and then developing and implementing changes to the programs and the overall portfolio based on that analysis. Indeed, PPL Electric would need to be proactive and prepare for the possibility that programs could be terminated as part of the annual reconciliation. Given the extremely expedited litigation schedule in this proceeding, such radical proposals cannot be accommodated within this timeframe.

13. In sum, PPLICA should have raised its issues with the TRC at Docket No. M-2015-2468992, where all EDCs would have the opportunity to participate and the Commission could change the TRC methodology used in all EDCs' Phase III EE&C Plans. PPLICA's

attempt to raise these issues only in PPL Electric's Phase III EE&C Plan proceeding should be rejected.

14. Thus, the portions of PPLICA's direct testimony relating to issues with the use of forecasted avoided energy costs in the TRC test, monitoring and reporting actual benefits of measures using a trued-up TRC test, and the annual elimination of programs that fall below a TRC value of 1.0 based on actual avoided energy costs should be stricken.

15. Notwithstanding, considering the expedited schedule of this proceeding, PPL Electric has responded to the testimony at issue in the Company's rebuttal testimony. If PPL Electric's Motion to Strike ultimately is granted, the Company shall amend its rebuttal testimony to remove any testimony that responds to the stricken portions of PPLICA Statement No. 1.

III. CONCLUSION

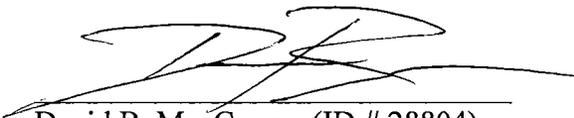
WHEREFORE, PPL Electric Utilities Corporation respectfully requests that the Honorable Susan D. Colwell strike the portions of the PP&L Industrial Customer Alliance's direct testimony (PPLICA Statement No. 1) relating to the use of forecasted avoided energy costs in the TRC test, monitoring and reporting actual benefits of measures using a trued-up TRC test, and the annual elimination of programs for which Large C&I customers are eligible that fall below a TRC value of 1.0 based on actual avoided energy costs.

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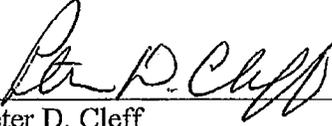
**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of PPL Electric Utilities	:	
Corporation for Approval of its Act 129	:	Docket No. M-2015-2515642
Phase III Energy Efficiency and	:	
Conservation Plan	:	

VERIFICATION

I, Peter D. Cleff, being the Manager-Energy Efficiency Evaluation and Performance at PPL Electric Utilities Corporation, hereby state that the facts above set forth are true and correct to the best of my knowledge, information and belief and that I expect that PPL Electric Utilities Corporation to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa.C.S. § 4904 relating to unsworn falsification to authorities.

Date: January 25, 2016



Peter D. Cleff

Attachment A

**PP&L INDUSTRIAL CUSTOMER ALLIANCE (“PPLICA”) RESPONSES TO
PPL ELECTRIC UTILITIES CORPORATION (“PPL ELECTRIC”)
INTERROGATORIES AND REQUESTS
FOR PRODUCTION OF DOCUMENTS – SET I**

DOCKET NO. M-2015-2515642

- PPL to PPLICA-I-12.** Re: PPLICA Statement No. 1, page 11, line 17 to page 12, line 2. Regarding Mr. Messer’s recommendation that the Commission “terminate any programs with a TRC value below 1.00 over a 12-month period” as part of the annual reconciliation process:
- (a) Does this recommendation apply to all programs, including the low-income programs? If not, please detail to which programs or types of programs this recommendation applies.
 - (b) Does this recommendation apply to pilot programs that are designed to be operated across multiple program years?
 - (c) If a program is terminated as part of this recommendation, is it Mr. Messer’s position that the program could be reintroduced in a future program year or Phase? If so, when?
 - (d) If the answer to subpart (c) is in the negative, is it Mr. Messer’s position that a modified version of that program could be introduced in a future program year or Phase? If so, when?

RESPONSE

- (a) Mr. Messer's recommendation would apply solely to all programs for which Large C&I customers are eligible, with the exception of pilot programs.
- (b) Consistent with the Commission's prior determination that pilot programs shall not be subject to cost-effectiveness standards, Mr. Messer's recommendation should not be applied to pilot programs.
- (c) Once terminated, reintroduction of a program should be regarded as a proposed new program subject to review and approval as an amendment to PPL' s EE&C Plan. Under this structure, PPL may reintroduce the program with changes intended to ensure cost-effectiveness.
- (d) See above response to I-12(c).

Response Provided by: **Michael K. Messer**
Manager, Regulatory and Energy Affairs
Linde LLC

Date: January 21, 2016

Attachment B

**PP&L INDUSTRIAL CUSTOMER ALLIANCE (“PPLICA”) RESPONSES TO
PPL ELECTRIC UTILITIES CORPORATION (“PPL ELECTRIC”)
INTERROGATORIES AND REQUESTS
FOR PRODUCTION OF DOCUMENTS – SET I**

DOCKET NO. M-2015-2515642

PPL to PPLICA-I-9. Re: PPLICA Statement No. 1, page 5, line 1 to page 8, line 19. Did PPLICA or any of its members file any comments or reply comments concerning the Tentative TRC Order at Docket No. M-2015-2468992 about the use actual market prices in TRC calculations? If so, please provide a copy of such comments or reply comments.

RESPONSE

See attachment I-9.

Response Provided by: Michael K. Messer
Manager, Regulatory and Energy Affairs
Linde LLC

Date: January 21, 2016

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

2016 Total Resource Cost (TRC) Test : Docket No. M-2015-2468992

REPLY COMMENTS OF
INDUSTRIAL CUSTOMER GROUPS

On March 11, 2015, the Pennsylvania Public Utility Commission ("Commission" or "PUC") entered its Tentative Order in the above-captioned proceeding. On April 27, 2015, the following parties submitted Comments regarding the Tentative Order: Citizens for Pennsylvania's Future, the Clean Air Council, the Sierra Club, the Natural Resources Defense Council and the Environmental Defense Fund (collectively, "PennFuture"); Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania; Duquesne Light Company; Metropolitan Edison Company, Pennsylvania Electric Company, Pennsylvania Power Company and West Penn Power Company; PECO Energy Company; PPL Electric Utilities Corporation ("PPL"), and The Pennsylvania State University.

The Industrial Energy Consumers of Pennsylvania ("IECPA"), Met-Ed Industrial Users Group ("MEIUG"), Penelec Industrial Customer Alliance ("PICA"), Penn Power Users Group ("PPUG"), Philadelphia Area Industrial Energy Users Group ("PAIEUG"), PP&L Industrial Customer Alliance ("PPLICA"), and West Penn Power Industrial Intervenors ("WPPII") (collectively, "Industrial Customer Groups"), hereby submit these limited Reply Comments.

A. The Commission Should Clarify that the TRC Test Applies Separately to DR and EE.

In its Comments, PPL requests for the Commission to clarify whether Demand Reduction ("DR") and Energy Efficiency ("EE") must be cost-effective individually for compliance with the Total Resource Cost ("TRC") test, or whether only the portfolio of EE and DR combined must be cost-effective. The Industrial Customer Groups assert that the applicable test must be performed separately for DR and EE on a going-forward basis. Although Phase I included statutorily-mandated DR and EE goals, the statute establishes separate tests to determine whether cost-effective additional goals are feasible after Phase I. *See* 66 Pa. C.S. §§ 2806.1(c)(3) and 2806.1(d)(2). As a result, the TRC compliance should be measured separately going forward in any Phase for which there will be DR or EE goals. Rebundling the two for purposes of applying the TRC tests in subsequent phases is inconsistent with the separate treatment of each potential goal under the statute after Phase I. *See* 66 Pa. C.S. §§ 2806.1(c)(3) and 2806.1(d)(2).

B. The Commission Should Reject PennFuture's Request to Include Non-Energy Benefits in the Cost-Effectiveness Test.

In the Order establishing the TRC test for Phase II, the Commission concluded that non-energy impacts such as better health and a cleaner environment should be excluded from the TRC analysis. PennFuture, *et al.*, suggests that the Commission should revisit that determination by including non-energy benefits in the Phase III analysis. This request is inconsistent with the statute and should be rejected.

Although Act 129 of 2008 allows the Commission to use cost-effectiveness tests other than the TRC, it is clear that the General Assembly intended for the Commission to consider only monetary benefits and costs of the program, not non-monetary benefits. The General Assembly chose to specifically define the "Total Resource Cost Test" in the statute as being a comparison of monetary costs and monetary benefits. *See* 66 Pa. C.S. §2806.1(n). The General

Assembly specifically chose to limit the test to monetary costs, and this choice should apply to whatever cost-effectiveness test the Commission adopts. The exclusion of non-monetary benefits is consistent with the General Assembly's intent. The Industrial Customer Groups urge the Commission to reaffirm its initial conclusion that only monetary benefits will be evaluated, and not non-monetary benefits as advocated by PennFuture.

WHEREFORE, Industrial Energy Consumers of Pennsylvania, Met-Ed Industrial Users Group, Penelec Industrial Customer Alliance, Penn Power Users Group, Philadelphia Area Industrial Energy Users Group, PP&L Industrial Customer Alliance, and West Penn Power Industrial Intervenors respectfully request that the Pennsylvania Public Utility Commission consider and adopt, as appropriate, the foregoing Reply Comments in issuing the Final Order regarding the 2016 TRC for Phase III.

Respectfully submitted,

McNEES WALLACE & NURICK LLC

By 

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Dated: May 11, 2015