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April 28, 2016

**VIA HAND DELIVERY**Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street  
P.O. Box 3265  
Harrisburg, PA 17105-3265RECEIVED  
2016 APR 28 AM 11:22  
PUC  
SECRETARY'S OFFICE**Re: West Penn Power Company – General Base Rate Filing**  
**Docket No. R-2016-2537359**

Dear Secretary Chiavetta:

**INTRODUCTION AND CONTENTS OF THE FILING**

Pursuant to Section 1308 of the Pennsylvania Public Utility Code, 66 Pa.C.S. § 1308, enclosed for filing on behalf of West Penn Power Company (“West Penn” or the “Company”) is Supplement No. 10 to West Penn’s Tariff Electric – Pa. P.U.C. No. 38 (“Supplement No. 10”) and Supplement No. 15 to Tariff Electric – Pa. P.U.C. No. 40 (“Supplement No. 15”). Supplement No. 15 (marked for identification as West Penn Company Exhibit 1) is applicable throughout West Penn’s service area. Supplement No. 10 (marked for identification as West Penn Company Exhibit 2) applies only to the University Park campus of the Pennsylvania State University. Supplement Nos. 10 and 15 set forth proposed rates designed to produce an increase in the Company’s annual distribution revenue of \$98.2 million based on data for a fully projected future test year ending December 31, 2017. Supplement Nos. 10 and 15 also contain non-substantive revisions to the language of certain Rules and Regulations, rate schedules and riders in the Company’s currently effective tariffs, as summarized in West Penn Exhibit KMS-7. Supplement Nos. 10 and 15 bear an issue date of April 28, 2016, and an effective date of June 27, 2016.

Along with Supplement Nos. 10 and 15, the Company is filing all the supporting data required by the Pennsylvania Public Utility Commission’s (“PUC” or “Commission”) regulations at 52 Pa. Code §§ 53.52 – 53.53, including the written direct testimony of nine witnesses, who are identified in West Penn Exhibit CVF-2. A summary of the reasons for the proposed rate increase is set forth in the Company’s Statement of Reasons, which is marked for identification as West Penn Exhibit CVF-1.

The Company is filing one complete hard copy and one electronic copy, on the enclosed CD, of its entire filing. An index cross-referencing the contents of the Company's supporting data and the Commission's filing requirements is attached as Appendix A to this transmittal letter.

#### **USE OF ALTERNATIVE METHOD OF CUSTOMER NOTIFICATION**

West Penn hereby advises the Commission that it has elected to use the alternative method of customer notification set forth in the Commission's regulations at 52 Pa. Code § 53.45(b)(4). Consequently, as required by that regulation, West Penn will notify its customers of the proposed rate increase through bill inserts along with paid advertisements in major local newspapers.<sup>1</sup> West Penn also agrees to extend from 60 to 90 days the minimum period within which the filing of a complaint places the burden of proof upon the Company with respect to proposed rates, pursuant to 52 Pa. Code § 53.45(b)(4)(vi).

#### **REQUEST FOR CONFIDENTIAL TREATMENT OF PROPRIETARY INFORMATION**

West Penn Exhibits RAD-7 and RAD-40 contain information that West Penn considers to be proprietary and confidential. These pages have been marked *Highly Confidential*, are enclosed in separate envelopes and have not been included in the electronic version of the filing.

West Penn requests that the copies of the material that have been marked *Highly Confidential* and are contained in the envelopes similarly marked *Highly Confidential* be treated confidentially by the Commission, including its various Offices and Bureaus. In particular, the Company requests that the *Highly Confidential* material be excluded from the Commission's public document folder and not otherwise be disclosed to the public. West Penn intends to request the entry of an appropriate Protective Order from the presiding Administrative Law Judge(s) to maintain the confidentiality of such material if it is to be provided to parties in this case.

#### **REQUEST FOR CONSOLIDATION**

This filing is being made contemporaneously with general rate increase filings by West Penn's Pennsylvania affiliates at the docket numbers identified below:

Pennsylvania Electric Company ("Penelec")	R-2016-2537352
Pennsylvania Power Company ("Penn Power")	R-2016-2537355
Metropolitan Edison Company ("Met-Ed")	R-2016-2537349

Pursuant to 52 Pa. Code § 5.81, West Penn, by this transmittal letter, and Penelec, Penn

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<sup>1</sup> In addition, West Penn is posting notice of this filing at its Company headquarters pursuant to 52 Pa. Code § 53.45(b)(1), posting the filing to its website, and issuing a news release describing the proposed changes to local newspapers, radio and television stations pursuant to 52 Pa. Code § 53.45(b)(2).

Power and Met-Ed, in their respective transmittal letters, request that proceedings initiated with regard to their rate filings be formally consolidated by the Commission at the earliest possible opportunity. There is a fundamental commonality to virtually all of the components of the Companies' revenue requirements, rate designs and related issues. Consequently, proceedings initiated by the Commission will involve a substantial number of common questions of law and fact. The resources of the Commission and all parties would be used most efficiently and cost effectively, and administrative economy would be advanced, by formally consolidating the proceedings initiated with respect to all of the Companies' rate filings.

**COUNSEL OF RECORD AND SERVICE ON THE COMPANY**

West Penn will be represented by the following counsel in this proceeding:

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West Penn's attorneys are authorized to accept service on behalf of the Company in this proceeding. West Penn requests that the Commission and all parties serve copies of all documents in this proceeding on its attorneys.

Secretary Rosemary Chiavetta

April 28, 2016

Page 4

### CERTIFICATE OF SERVICE

As indicated on the attached Certificate of Service, the Company has served copies of this filing on the Commission's Bureau of Investigation and Enforcement, the Office of Consumer Advocate, the Office of Small Business Advocate, the Pennsylvania State University, and the West Penn Power Industrial Intervenors. The Company is also providing courtesy copies of the filing to the Commission's Law Bureau, Office of Special Assistants, and Bureau of Technical Utility Services.

Respectfully submitted,



Tori L. Giesler

Enclosures

- c: Certificate of Service (w/encls.)  
Gladys M. Brown, Chairman (w/encls.)  
Andrew G. Place, Vice Chairman (w/encls.)  
John F. Coleman, Jr., Commissioner (w/encls.)  
Robert F. Powelson, Commissioner (w/encls.)  
Pamela A. Witmer, Commissioner (w/encls.)  
Bohdan R. Pankiw, Chief Counsel, Law Bureau (w/encls.)  
Cheryl Walker Davis, Director, Office of Special Assistants (w/encls.)  
Paul T. Diskin, Director, Bureau of Technical Utility Services (w/encls.)

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APR 28 2016

PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**PENNSYLVANIA PUBLIC UTILITY  
COMMISSION**

vs.

**WEST PENN POWER COMPANY**

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:  
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**Docket No. R-2016-2537359**

**CERTIFICATE OF SERVICE**

I hereby certify and affirm that I have this day served copies of the **2016 General Distribution Base Rate Filing on behalf of West Penn Power Company** on the following persons, in the manner specified below, in accordance with the requirements of 52 Pa. Code § 1.54:

**VIA HAND DELIVERY**

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*Counsel for West Penn Power  
Industrial Intervenors*

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APR 28 2016

PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

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Respectfully submitted,



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*Counsel for West Penn Power Company*

Dated: April 28, 2016