

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission	:	
	:	Docket No. R-2016-2537349
	:	
v.	:	
	:	
	:	
Metropolitan Edison Company	:	

CLEAN AIR COUNCIL’S PETITION TO INTERVENE

Pursuant to 52 Pa. Code §§ 5.72-5.75 Clean Air Council (“CAC”) hereby files this Petition to Intervene in the above captioned proceeding. In support thereof, CAC states as follows:

1. CAC is a member-supported environmental organization serving Pennsylvania and the Mid-Atlantic Region. CAC is dedicated to protecting and defending everyone’s right to breathe clean air. CAC works through a broad array of related sustainability and public health initiatives, using public education, community action, government oversight, and enforcement of environmental laws. CAC has members in Metropolitan Edison Company’s (“Met-Ed”) service territory.

2. CAC’s attorneys in this matter are:

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3. On April 28, 2016, Met-Ed submitted a rate filing, Supplement No. 23 to its Tariff Electric PA P.U.C. No. 52 (“Supplement No. 23”), in which Met-Ed proposes to increase its retail distribution rates by approximately \$140.2 million. This would result in an average increase for residential customers of approximately 13.59% in distribution rates. Met-Ed has stated that this increase is partly due to a reduction in earnings from successful energy efficiency programs.

4. The Commission’s regulations allow intervention where a person has an interest in the proceeding which may be directly affected and which is not adequately represented by existing parties, and, as to which the person may be bound by the action of the Commission in the proceeding. 52 Pa. Code § 5.72(a)(2). Intervention is also permitted where participation of the person may be in the public interest. 52 Pa. Code § 5.72(a)(3). A “person” includes a corporation and an association. 52 Pa. Code § 1.8.

5. CAC meets the standards for intervention set forth in 52 Pa. Code § 5.72(a). CAC is committed to improving air quality throughout Pennsylvania; reducing the impact of air pollution on the health of vulnerable populations; and ensuring that renewable energy and energy efficiency be expanded and utilized to the fullest extent possible. The Commission’s actions in this proceeding regarding Met-Ed’s proposed rate increase will have a direct impact on the ability of CAC to achieve these goals.

6. CAC’s interests in this proceeding are unique from, and not adequately represented by, other parties that may seek to intervene because CAC is a well-established local environmental organization that has extensive experience in air quality issues, renewable energy and energy efficiency.

7. CAC's intervention is in the public interest because it will enable CAC to contribute its unique perspective and insight of a well-established local environmental organization as the Commission considers Met-Ed's proposals. CAC has intervened in previous matters before the Pennsylvania Public Utility Commission, New Jersey Board of Public Utilities and Delaware Public Service Commission.

8. Due to the early stage of this proceeding, CAC reserves the right to raise and address issues identified through its continued review and analysis of Met-Ed's rate increase proposal (and related information) or other issues raised by other parties.

WHEREFORE, Clean Air Council respectfully requests that the Commission grant this Petition to Intervene.

Respectfully submitted,



Joseph Otis Minott, Esquire



Ernest Logan Welde, Esquire

Date: May 31, 2016

Attorneys for Clean Air Council

VERIFICATION

I, Ernest Logan Welde, staff attorney Clean Air Council, hereby verify that the facts contained in the foregoing pleading are true and accurate to the best of my knowledge and that I am duly authorized to make this verification, and that I expect to be able to prove the same at any hearing held in this matter.

A handwritten signature in cursive script that reads "Ernest Logan Welde".

Ernest Logan Welde, Esquire

CERTIFICATE OF SERVICE

I hereby certify that this day I served a copy of Clean Air Council's Petition to Intervene upon the persons listed below in the manner indicated in accordance with the requirements of 52 Pa. Code § 1.54.

Via Email and/or First Class Mail

<p>Tori L. Giesler, Esq. FirstEnergy Service Company 2800 Pottsville Pike Reading, PA 19612 tgiesler@firstenergycorp.com</p>	<p>Tanya J. McCloskey, Esq. Office of Consumer Advocate 555 Walnut Street, 5th Floor Harrisburg, PA 17101-1923 tmccloskey@paoca.org</p>
<p>John R. Evans, Esq. Office of Small Business Advocate 300 North Second Street, Suite 202 Harrisburg, PA 17101 jorevan@pa.gov</p>	<p>Johnnie E. Simms, Director Bureau of Investigation & Enforcement Pa. Public Utility Commission 400 North Street, 2nd Floor Harrisburg, PA 17120 jennejohns@pa.gov</p>
<p>Thomas P. Gadsen, Esq. Anthony C. DeCusatis, Esq. Brooke E. McGlinn, Esq. Catherine G. Vasudevan, Esq. Morgan, Lewis & Bockius LLP 1701 Market Street Philadelphia, PA 19103 tgadsen@morganlewis.com adecusatis@morganlewis.com bmclinn@morganlewis.com cvasudevan@morganlewis.com</p>	<p>Charis Mincavage, Esq. Susan E. Bruce, Esq. Vasiliki Karandrikas, Esq. Teresea K. Schmittberger, Esq. McNees Wallace & Nurick, LLC 100 Pine Street, PO Box 1166 Harrisburg, PA 17108 cmincavage@mwn.com sbruce@mwn.com vkandrikas@mwn.com tschmittberger@mwn.com</p>



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