

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission, et al	:	R-2016-2537349
	:	C-2016-2543247
v.	:	C-2016-2544355
	:	C-2016-2549370
Metropolitan Edison Company	:	C-2016-2549787

Pennsylvania Public Utility Commission, et al	:	R-2016-2537352
	:	C-2016-2543266
v.	:	C-2016-2544356
	:	C-2016-2546231
Pennsylvania Electric Company	:	C-2016-2549792

Pennsylvania Public Utility Commission, et al	:	R-2016-2537355
	:	C-2016-2543268
v.	:	C-2016-2544358
	:	C-2016-2547484
Pennsylvania Power Company	:	

Pennsylvania Public Utility Commission, et al	:	R-2016-2537359
	:	C-2016-2542278
v.	:	C-2016-2543315
	:	C-2016-2544359
West Penn Power Company	:	C-2016-2548424
	:	C-2016-2549413

**PETITION TO INTERVENE
CITIZENS FOR PENNSYLVANIA’S FUTURE**

Citizens for Pennsylvania’s Future (“PennFuture”) submits this Petition to Intervene in the above captioned matters. PennFuture requests that the Pennsylvania Public Utility Commission (“Commission”) grant it party status.

Petitioner states the following in support:

1. Petitioner is a statewide public interest membership organization working to enhance Pennsylvania's environment and economy, with offices in Harrisburg, Philadelphia, Pittsburgh and Wilkes-Barre. Petitioner has members who reside and use energy in the service territory of the companies before the Commission. Petitioner has members who reside on streets lighted by high pressure sodium vapor lamps and other energy inefficient street light technology.

2. The name and address of counsel for Petitioner is:

George Jugovic, Jr.
Chief Counsel
Citizens for Pennsylvania's Future
200 First Avenue, Suite 200
Pittsburgh, Pennsylvania 15222

3. Petitioner has a right and interest in assuring that safe, reliable, clean and affordable public utility service, and participation in this proceeding is an appropriate way to protect these rights and interest. Petitioner may intervene in this proceeding pursuant to 52 Pa. Code 5.71-74.

4. Petitioner has interests in and perspectives on issues in this proceeding that are not adequately represented by other parties of record, including but not limited to: grid modernization, integrated Volt/VAR control, and the impact of rate design on energy efficiency, particularly as it relates to energy efficient street lighting for local communities across the service territory.

5. Petitioners intend to review and analyze the petitions of the companies and how the proposed rate design will affect Petitioners' members.

6. Petitioners reserve the right to raise other issues as necessary and appropriate during the course of the proceeding and to respond to issues raised by other parties.

7. All documents and correspondence in this proceeding should be addressed to:

George Jugovic, Jr.
Chief Counsel
Citizens for Pennsylvania's Future
200 First Avenue, Suite 200
Pittsburgh, Pennsylvania 15222

8. For the foregoing reasons, Petitioner requests that the Commission grant this Petition and confer status as intervenors in this proceeding.

CONCLUSION

Wherefore, PennFuture respectfully requests that the Commission grant this Joint Petition to Intervene, provide PennFuture and EDF with full-party status in this proceeding, and allow such other relief as it deems necessary.

Respectfully Submitted,

/s/ George Jugovic, Jr.

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	:	C-2016-2549413

**PREHEARING MEMORANDUM OF
CITIZENS FOR PENNSYLVANIA’S FUTURE**

Citizens for Pennsylvania’s Future (“PennFuture”) hereby submits this Prehearing Memorandum in the above-captioned proceeding. PennFuture intends to participate in this proceeding as an “active” party.

I. HISTORY OF THE PROCEEDING

On April 29, 2016, Metropolitan Edison Company (“Met Ed” or “Company”) filed with the Pennsylvania Public Utility Commission (“PUC” or “Commission”) an application for approval of an electric distribution base rate increase.

The Prehearing Conference is scheduled for Friday, June 17, 2016.

Administrative Law Judge Mary D. Long is the presiding officer.

PennFuture submits this Prehearing Conference Memorandum in compliance with the Prehearing Order issued June 9, 2016.

II. ANTICIPATED ISSUES AND SUB-ISSUES

The Petitioner, on behalf of its members and the public interest, has an interest in several issues, as described more fully below.

Volt/VAR Optimization

Volt/VAR Optimization is a cost-effective technology that not only improves reliability and resiliency but also lowers energy usage and peak demand. This process can be implemented using different types of technology which, in turn, has different levels of effectiveness. The Company should have a plan for implementing Volt/VAR Optimization to the full extent it is cost-effective to do so. Prudent operation of the distribution grid demands no less.

To this end, Petitioner will investigate the manner in which the Company implements Volt/VAR Optimization and the technology used by the Company; the circuits where the process has been implemented; the amount of energy savings and peak demand reductions experienced from Volt/VAR Optimization; the Company’s plan for

implementing this technology on additional circuits; and the cost/benefit analysis which the Company uses to decide whether to implement this technology.

Data Access

The Company has a prudence obligation to maximize the customer benefits from its smart grid deployment. This requires that the Company must provide customers and third parties with access to customer energy usage data. This will enable customers to monitor their energy usage and will also enable competitive energy suppliers to provide dynamic pricing options for customers. Petitioner will investigate the protocols used by the Company to provide data access and will make recommendations for certain best practices for the Company to follow in this area.

Rate Design and LED Street Lighting

The Company has proposed various rate design changes including an increase in the residential customer fixed monthly charge from \$10.25/month to \$17.42/month, as well as lighting tariff changes, including conversion of existing high pressure sodium street lights to more efficient LED street lights. These proposals would alter how much customers pay to receive the tariffed services. Petitioner proposes to investigate the new rate design proposals and determine whether the changes are just and reasonable, or whether they unfairly alter the terms and conditions of service, or the costs customers must pay to receive the service.

PennFuture reserves the right to raise additional issues as they may come to light through the discovery and review process.

III. PROPOSED WITNESSES

Dick Munson

Ronny Sandoval

PennFuture intends to present the testimony of Mike Speerschneider in this matter to testify as to the above noted issues. Mr. Speerschneider has a business address of EverPower Wind Holdings, Inc. 1251 Waterfront Place, 3rd Floor, Pittsburgh, PA 15222.

PennFuture intends to present testimony of an expert or experts to address the proposed rate design for street lights. This expert has not yet been identified. PennFuture reserves the right to amend this Pre-Hearing memorandum to identify its street light expert(s).

PennFuture intends to participate in this proceeding through the submission of discovery, the cross-examination of other parties' witnesses, participation in settlement negotiations as they occur, and the submission of briefs, exceptions and reply exceptions, as necessary.

IV. PROPOSED SCHEDULE AND DISCOVERY RULES

PennFuture will work with the parties to develop an appropriate procedural schedule. However, based on communications with the parties and the Court, it appears that this matter will have a hearing date starting the last week in August. To accommodate the undersigned's schedule, it is respectfully requested that PennFuture's witness be called, if necessary, on the first day of the hearings if they are to begin the last week in August. PennFuture will cooperate to develop discovery rules in accordance with the Commission's regulations and any ALJ directives.

V. POSSIBILITY OF SETTLEMENT

PennFuture is willing to participate in discussions with the other parties to amicably resolve the issues in this proceeding.

Respectfully submitted,

/s/ George Jugovic, Jr.

Counsel for PennFuture
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DATED: June 14, 2016

CERTIFICATE OF SERVICE

I hereby certify that foregoing Petition to Intervene and Pre-hearing Memorandum were served upon the parties listed below via email and first class mail, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

TORI L GIESLER ESQUIRE FIRSTENERGY 2800 POTTSVILLE PIKE PO BOX 16001 READING PA 19612-6001 610.921.6658 Representing Metropolitan Edison Company, Pennsylvania Electric Company, Pennsylvania Power Company, and West Penn Power Company	ALLISON C KASTER RATE ESQUIRE SECOND FLOOR WEST 400 NORTH STREET HARRISBURG PA 17120 717.783.7998 Representing PUC Bureau of Investigation and Enforcement
THOMAS P GADSDEN ESQUIRE ANTHONY C DECUSATIS ESQUIRE CATHERINE G VASUDEVAN ESQUIRE BROOKE E MCGLINN ESQUIRE MORGAN LEWIS & BOCKIUS LLP 1701 MARKET STREET PHILADELPHIA PA 19103-2921 215.963.5034 Representing Metropolitan Edison Company, Pennsylvania Electric Company, Pennsylvania Power Company, and West Penn Power Company	ROBERT REDINGER JR 1881 PAINTERS RUN RD PITTSBURGH PA 15241 412.221.7682 Complainant C-2016-2542278 West Penn Power
JOSEPH OTIS MINOTT ESQUIRE LOGAN WELDE ESQUIRE CLEAN AIR COUNCIL 135 S 19TH STREET SUITE 300 PHILADELPHIA PA 19103 Representing Clean Air Council	DARRYL A LAWRENCE ESQUIRE* LAUREN M BURGE ESQUIRE DAVID T EVRARD ESQUIRE CANDIS A TUNILO ESQUIRE 5TH FLOOR FORUM PLACE 555 WALNUT STREET HARRISBURG PA 17101-1923 717.783.5048 Representing Office of Consumer Advocate C-2016-2543247 - Metropolitan Edison Company C-2016-2543266 - Pennsylvania Electric Company C-2016-2543268 - Pennsylvania Power Company C-2016-2543315 - West Penn Power Company
JEANETTE LIPPY 3672 CENTENNIAL ROAD HANOVER PA 17331 Complainant C-2016-2549370 Metropolitan Edison Company	DANIEL G ASMUS ESQUIRE 300 NORTH SECOND STREET SUITE 202 HARRISBURG PA 17101 Representing Office of Small Business Advocate C-2016-2544355 - Metropolitan Edison Company C-2016-2544356 - Pennsylvania Electric Company

	C-2016-2544358 - Pennsylvania Power Company C-2016-2544359 - West Penn Power Company
SCOTT J RUBIN ESQUIRE LAW OFFICE OF SCOTT J RUBIN 333 OAK LANE BLOOMSBURG PA 17815-2036 Intervenor Pennsylvania Electric Company Representing International Brotherhood of Electrical Workers, Local 459	KENNETH SPRINGIRTH 4720 CLIFF DIRVE ERIE PA 16511 Complainant C-2016-2546231 Pennsylvania Electric Company
GEORGE W KERR BOROUGH COUNCIL PRESIDENT WORTHINGTON BOROUGH STREET LIGHTS PO BOX 66 STREET LIGHT STREET WORTHINGTON PA 16262 Representing Worthington Borough Street Lights C-2016-2548424 - West Penn Power Company	RICHARD COLLINS ENGINEER 440 MONMOUTH DRIVE CRANBERRY TOWNSHIP PA 16066-5756 Complainant C-2016-2547484- Pennsylvania Power Company
SUSAN E BRUCE ESQUIRE MCNEES WALLACE & NURICK LLC 100 PINE STREET P O BOX 1166 HARRISBURG PA 17108-1166 Representing West Penn Power Industrial Intervenors C-2016-2549413 - West Penn Power Company	CHARIS MINCAVAGE ESQUIRE VASILIKI KARANDRIKAS ESQUIRE KENNETH STARK ESQUIRE ALESSANDRA L. HYLANDER MCNEES WALLACE & NURICK 100 PINE STREET PO BOX 1166 HARRISBURG PA 17108 Representing Met-Ed Industrial Users Group and Penelec Industrial Users Group C-2016-2549787 - Metropolitan Edison Company. C-2016-2549792 - Pennsylvania Electric Company

/s/ George Jugovic, Jr.

DATE: June 14, 2016