



THOMAS, LONG,
NIESEN & KENNARD

Attorneys and Counsellors at Law

CHARLES E. THOMAS, JR.
Direct Dial: 717.255.7615
cthomasjr@thomaslonglaw.com

October 28, 2010

RECEIVED
2010 OCT 28 PM 3:26
PA 200
SECRETARY'S BUREAU

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

In re: Dockets Nos. A-2010-2176520 and A-2010-2176732
Joint Application of West Penn Power Company, d/b/a Allegheny Power, Trans
Allegheny Interstate Line Company and FirstEnergy Corporation

Dear Secretary Chiavetta:

Enclosed for filing in the above matter on behalf of the Pennsylvania Rural Electric Association ("PREA") are an original and three copies of its Statement in Support of the Joint Petition for Partial Settlement filed with the Public Utility Commission on October 25, 2010. Please include PREA's Statement in Support as an addendum to the Joint Petition for Partial Settlement.

Copies of the PREA's Statement in Support are being served upon the persons and in the manner set forth on the certificate of service attached to it. A CD with PREA's Statement in Support in searchable PDF format is also enclosed.

If the Commission requires any additional information regarding the matter, please advise the undersigned.

Very truly yours,

THOMAS, LONG, NIESEN & KENNARD

By


Charles E. Thomas, Jr.

Encl.

cc: Certificate of Service (w/encl.)
David Dulick (w/encl.)

101028-Chiavetta (PREA Statement in Support).wpd

Before The
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Joint Application of West Penn : Docket No. A-2010-2176520
Power Company d/b/a Allegheny : Docket No. A-2010-2176732
Power, Trans-Allegheny Interstate :
Line Company and FirstEnergy Corp. :
for a Certificate of Public :
Convenience Under Section :
1102(A)(3) of the Public Utility Code :
Approving A Change of Control Of :
West Penn Power Company and :
Trans-Allegheny Interstate Line :
Company :

RECEIVED
2010 OCT 28 PM 3:26
PA PUB
SECRETARY'S BUREAU

**THE PENNSYLVANIA RURAL ELECTRIC ASSOCIATION'S
STATEMENT IN SUPPORT OF
JOINT PETITION FOR PARTIAL SETTLEMENT**

AND NOW, comes the Pennsylvania Rural Electric Association ("PREA"), an intervenor in the above docketed merger proceeding ("Merger Proceeding") before the Pennsylvania Public Utility Commission ("Commission"), and by its attorneys submits the following statement in support of the partial settlement ("Settlement") proposed in the Joint Petition for Partial Settlement submitted by all but four of the parties to the Merger Proceeding.¹

¹ The signatory parties to the Settlement are the Pennsylvania Public Utility Commission Office of Trial Staff, the Office of Consumer Advocate, the Pennsylvania Department of Environmental Protection, the International Brotherhood of Electrical Workers, the Utility Workers Union of America, AFL-CIO and UWUA System Local No. 102, The Pennsylvania State University, the Met-Ed Industrial Users Group and the Penelec Industrial Customer Alliance, the West Penn Power Industrial Intervenors, the Pennsylvania Rural Electric Association, the Pennsylvania Mountains Healthcare Alliance, the West Penn Power Sustainable Energy Fund, the York County Solid Waste and Refuse Authority, ARIPPA, the Clean Air Council, Citizens for Pennsylvania's Future, and Constellation New Energy, Inc. and Constellation Energy Commodities Group, Inc. Those not joining in the Settlement are RESA, OSBA, Direct Energy and Citizens Power.

I. BACKGROUND

1. This Merger Proceeding concerns the Joint Application of West Penn Power Company ("West Penn"), Trans-Allegheny Interstate Line Company ("TrAILCo") and FirstEnergy Corp. ("FirstEnergy") (collectively "Joint Applicants") for a certificate of public convenience approving a change in control of West Penn and TrAILCo. The change in control would be accomplished through an Agreement and Plan of Merger whereby Allegheny Energy, Inc. ("Allegheny") and its subsidiaries, including West Penn and TrAILCo, would be merged into FirstEnergy with Allegheny becoming a subsidiary of FirstEnergy (the "Merger").

2. The PREA is a trade association representing 13 Pennsylvania rural electric distribution cooperatives and Allegheny Electric Cooperative, Inc.² that provide electricity in the Commonwealth of Pennsylvania ("Commonwealth" or "Pennsylvania") to more than 200,000 consumer-members representing approximately 600,000 Pennsylvanians. The combined geographical area of the service territory of the 13 Pennsylvania rural electric distribution cooperatives is largely coterminous with the Pennsylvania service areas of subsidiaries of FirstEnergy and Allegheny.

3. On June 11, 2010, PREA filed its Petition to Intervene in compliance with the deadline established in the Notice published in the *Pennsylvania Bulletin* on

²There are 13 Pennsylvania member cooperatives of PREA: Adams Electric Cooperative, Inc., Bedford Rural Electric Cooperative, Inc., Central Electric Cooperative, Inc., Claverack Rural Electric Cooperative, Inc., New Enterprise Rural Electric Cooperative, Inc., Northwestern Rural Electric Cooperative Association, Inc., REA Energy Cooperative, Inc., Somerset Rural Electric Cooperative, Inc., Sullivan County Rural Electric Cooperative, Inc., Tri-County Rural Electric Cooperative, Inc., United Electric Cooperative, Inc., Valley Rural Electric Cooperative, Inc. and Warren Electric Cooperative, Inc. Sussex Rural Electric Cooperative, Inc., a New Jersey rural electric distribution cooperative, is also a member of PREA as is Allegheny Electric Cooperative, Inc., which is a non-profit generation and transmission cooperative formed under Pennsylvania law. Allegheny Electric is owned by its distribution cooperative members and provides or secures generation supply and transmission service for its members.

May 29, 2010. In its Petition to Intervene, PREA stated that although it was not opposed to the proposed Merger, it sought intervention to assure that the Merger and proposed combination of companies would lead to significant improvements in service and specifically reliability metrics, related to the delivery of electricity to its member cooperatives and the 600,000 rural Pennsylvanians that rely on Penelec/MetEd/West Penn delivery points. At the Prehearing Conference held June 22, 2010, the presiding Administrative Law Judges granted PREA's Petition to Intervene. A more detailed recitation of the history of the Merger Proceeding is set forth in the Joint Petition for Partial Settlement and is incorporated herein by reference.

II. ON RURAL ELECTRIC RELIABILITY ISSUES OF CONCERN TO PREA THE SETTLEMENT WILL AFFIRMATIVELY BENEFIT SERVICE

4. PREA's member cooperatives receive retail electric service from FirstEnergy at 18 locations in the Commonwealth.

5. PREA and its member cooperatives also receive electric generation supply through 205 delivery points located throughout Pennsylvania. Of the total 205 delivery points, only 2 are not served through facilities owned and operated by either Pennsylvania Electric Company ("Penelec")/Metropolitan Edison Company ("MetEd") or West Penn: 166 are with Penelec; 19 are with MetEd and 18 are with West Penn.³ Each of the 13 Pennsylvania member cooperatives has at least one delivery point served from either Penelec/MetEd or West Penn facilities. Most have several or numerous delivery points served by Joint Applicants or subsidiaries. PREA relies on these delivery points for delivery of generation to meet the electric

³ The remaining 2 delivery points are with PPL Electric Utilities.

service needs of its more than 200,000 Pennsylvania consumer-members and approximately 600,000 Pennsylvania residents.

6. Over the past several years, PREA has been an active protestant and/or intervenor in several Penelec/MetEd/GPU Energy ("GPUE")/FirstEnergy proceedings before this Commission, notably: the restructuring proceedings of both Penelec and MetEd at Docket No. R-00974009 and R-00974008, wherein transmission and distribution system reliability matters were resolved ("Restructuring Settlement"); the Commission's investigation of MetEd/Penelec's Reliability Performance at Docket No. I-00040102; the petition of MetEd/Penelec to amend benchmarks for electric distribution reliability at Docket No. P-00042115, wherein reliability matters were resolved by settlement ("Benchmark Settlement"); and the consolidated GPUE (i.e. Penelec/MetEd) rate proceeding at Docket No. R-00061366, wherein GPUE and PREA modified and clarified certain parts of the Joint Planning Process ("JPP") established in the Restructuring Settlement and in the Benchmark Settlement.

7. As previously noted, PREA, its member cooperatives and the approximately 600,000 rural Pennsylvanians that they serve, rely on over 200 Penelec/MetEd/West Penn delivery points for the reliable delivery of electricity. PREA has an obvious continuing interest in the reliability of service to and through the delivery points. The Settlement ensures that the substantial reliability of service benefits from these earlier settlements will not only be retained but will indeed be *enhanced and service thereby improved*.

a. The Settlement extends the JPP for five (5) years with an investment level of \$4 million for 2013 through 2018 projects unless Interruption

Duration Index (IDI) and Interruption Frequency Index (IFI) standards of at least 85% are achieved for all PREA delivery points, in which case the annual investment level will be reduced to \$3 million. In addition, 50% of the amounts per year are to be spent on tree trimming, breaker and battery maintenance on circuits serving the PREA delivery points, all of which will improve service reliability.

b. The Settlement permits PREA to elect to have the annual funding investment be used for other than the 25% worst performing delivery points, thereby permitting PREA to participate in the service investment process and improve the cooperation of both the regulated electric utilities and rural electric cooperatives for the benefit of the customers of each.

c. The Settlement also allows PREA to participate in the redesign of the auto dialer system for specific delivery points served by either FirstEnergy or Allegheny.

d. The Settlement requires FirstEnergy to repair or replace failed meters or components within 90 days, barring extenuating circumstances. This further assures that there will be no diminution of service following the Merger.

e. The Settlement modifies the standards for delivery points with five or fewer customers and modifies the calculation of outage time in cases where backfeeding by PREA member cooperatives can restore service to consumers. This should shorten the duration of outages for the benefit of all customers.

f. The Settlement preserves the JPP and extends all parts of the JPP process.

g. The Settlement clarifies Allegheny's post-Merger obligations and binds Allegheny to perform the requirements of the JPP on Allegheny's former system after the Merger is consummated.

h. The Settlement makes certain that unless specifically modified in the settlement the JPP terms and conditions will remain in force and requires the parties to restate the operative terms, conditions and agreements into one document within one year. The Settlement thus assures that there will be no misunderstandings with respect to the JPP.

8. The Rural Electric Reliability Issues Settlement thus provides significant affirmative benefits and satisfactorily resolves the concerns that caused PREA to file a Petition to Intervene and become a party. The Settlement terms and conditions will contribute to service reliability and therefore are in the public interest. Service reliability in rural areas served by PREA members is critical to quality of life and economic development in these areas, and the provisions of the Settlement will ensure that these critical service reliability issues will be adequately addressed well into the future.

III. THE SETTLEMENT AS A WHOLE IS IN THE PUBLIC INTEREST AND WILL PROVIDE SUBSTANTIAL AFFIRMATIVE BENEFITS

9. The Commission's policy is to encourage parties in contested proceedings to enter into settlements. 52 Pa. Code § 5.231(a). A settlement mitigates the time and expense of litigating the matter to its ultimate conclusion. This directly benefits all parties and the public.

10. Approval of the Settlement will avoid the necessity of further administrative and possible appellate proceedings as to the matters resolved through the Settlement, thereby affording substantial cost savings to the Commission, the parties and customers.

11. The resolution of the Rural Electric Reliability Issues proposed in the Settlement is in the public interest, consistent with all applicable standards, rules and

regulations and will provide affirmative benefits to rural cooperative consumer-members if the Merger is permitted to become effective.

12. Paragraph 59 of Section III of the Joint Petition for Settlement sets forth in summary fashion a number of the reasons why the settlement is in the public interest. *Those reasons are set forth below without amplification and require no further exposition here.*

- Additional Litigation Will Be Streamlined.
- The Settlement Is Consistent With Commission Policies Promoting Negotiated settlements.
- The Settlement Ensures the Merger Affirmatively Promotes the *Service, Accommodation, Convenience or Safety of the Public in a Substantial Way.*
- The Settlement Supports Universal Service Programs.
- The Settlement Promotes Environmental Issues.
- The Settlement Provides for Financial Governance Protections.
- The Settlement Enhances Retail Competition.
- The Settlement Provides for Reliability and Customer Service Enhancements.

13. PREA believes that when the Rural Electric Reliability terms and conditions are coupled with the other terms and conditions of the Settlement, the affirmative benefits from the Settlement are substantial and will accrue to all affected parties.

IV. SECRETARIAL LETTER QUESTIONS

14. On June 3, 2010, the Commission issued a letter directing the Joint Applicants and other parties to address the twelve issues and areas of concern ("Twelve Questions") identified in Attachment A to the letter. In their Scheduling and Briefing Order, dated June 23, 2010, the presiding Administrative Law Judges ordered all parties and intervenors to answer the Twelve Questions. By subsequent email, the presiding Administrative Law Judges advised that both settling and non-settling parties are expected to provide answers to the Twelve Questions and that settling parties who choose not to file and serve briefs may include their answers in their Statements in Support. PREA's responses to the Twelve Questions are attached hereto as Attachment A.

V. CONCLUSION

WHEREFORE, for the foregoing reasons, the Pennsylvania Rural Electric Association respectfully requests that Administrative Law Judges Wayne L. Weismandel and Mary D. Long recommend approval of the Joint Petition for Partial Settlement and thereafter, that the Pennsylvania Public Utility Commission adopt their recommendation and approve the Settlement of the Rural Electric Reliability Issues and other issues resolved in the Joint Petition for Partial Settlement.

Respectfully submitted,



Charles E. Thomas, Jr., Esquire
PA Attorney I.D. No. 07262
Thomas T. Niesen, Esquire
PA Attorney I.D. No. 31379
Jennifer M. Sultzaberger, Esquire
PA Attorney I.D. No. 200993
THOMAS, LONG, NIESEN & KENNARD
212 Locust Street
P.O. Box 9500
Harrisburg, PA 17108-9500

David J. Dulick, General Counsel
PA Attorney I.D. No. 27842
PENNSYLVANIA RURAL ELECTRIC
ASSOCIATION
212 Locust Street
P.O. Box 1266
Harrisburg, PA 17108-1266

Attorneys for
The Pennsylvania Rural Electric Association

DATE: October 28, 2010

ATTACHMENT A

Allegheny Energy, Inc. – FirstEnergy Corporation Merger
A-2010-2176520
A-2010-2176732

RECEIVED
2010 OCT 28 PM 3:21
PA PUBLIC BUREAU
SECRETARY'S BUREAU

Employment Levels and Corporate Headquarters

1. How will the merger impact employment levels in Pennsylvania, particularly, but not limited to, those employees not covered by collective bargaining agreements? What will the impact be on Allegheny Energy's corporate headquarters in Greensburg, PA, as well as the operating companies' offices?

PREA took no specific position on this issue in litigation. However, employment levels and corporate headquarters are addressed in Section II.A., pages 7-9, of the Settlement.

Customer Service and System Reliability

2. How will the merger affect the customer service and system reliability of West Penn Power and the FirstEnergy Pennsylvania utilities? How will the merger affect West Penn Power and the FirstEnergy Pennsylvania utilities ability to respond to outages and other emergencies?

PREA took no specific position on this issue in litigation. However, customer service and system reliability issues are addressed in Section II.J., pages 21-27 of the Settlement and Rural Electric Reliability Issues in particular are addressed in Section II.J.52. of the Settlement and in Section II of PREA's Statement in Support.

Corporate Structure

3. Review the impact of the initially proposed corporate structure of the merger versus the alternately proposed corporate structure. Which corporate structure will better protect the public interest?

PREA took no specific position on this issue in litigation and is not in a position to submit a response here.

Ring Fencing

4. What, if any, ring-fencing mechanisms are presently in place, or proposed as part of this transaction, to protect West Penn Power, Met-Ed, Penn Power, and Penelec from the business and financial risk of the parent and other non-regulated affiliates? Are any changes or additions necessary to better protect the public interest and make the regulated electric distribution subsidiaries bankruptcy remote?

PREA took no specific position on this issue in litigation. However, provisions regarding financial governance are addressed in Section II.H., pages 15-16, of the Settlement.

Smart Meter and Energy Efficiency Implementation

5. How will the merger impact the Act 129 smart meter and energy efficiency implementation plans of West Penn Power and First Energy's regulated utilities, Met-Ed, Penelec and Penn Power?

PREA took no specific position on this issue in litigation. However, smart meters and energy efficiency are addressed in Section II.D., pages 11-12, of the Settlement.

FirstEnergy Capital Structure and Credit Rating

6. How will the merger affect the capital structure of FirstEnergy Corporation? Will the merger create a more leveraged organization? How will the proposed merger impact the credit rating of FirstEnergy?

PREA took no specific position on this issue in litigation. However, provisions regarding each FirstEnergy Pennsylvania utility operating company's debt and credit provisions and capital structure are addressed in Section II.H., pages 15-16 of the Settlement.

Subsidiaries' External Borrowing and Bond Ratings

7. Will West Penn Power and the other Allegheny Energy subsidiaries that currently issue their own debt maintain their own external borrowing authority and separate bond rating?

PREA took no specific position on this issue in litigation. However, provisions regarding each FirstEnergy Pennsylvania utility operating company's debt and credit levels, as well as other financial governance matters including post-merger equity ratios, are addressed in Section II.H., pages 15-16, of the Settlement.

Money Pools

8. Will West Penn Power participate in the FirstEnergy Utility money pool? If, yes, please provide an updated agreement.

PREA took no specific position on this issue in litigation. However, separate money pools for regulated and unregulated operations are addressed in Section II.H., pages 15-16, of the Settlement. An updated agreement will have to be provided by Joint Applicants.

Merger Savings

9. How will the proposed merger savings benefit Pennsylvania ratepayers? Will cost savings benefit ratepayers or only shareholders?

PREA took no specific position on this issue in litigation. However, the sharing of merger savings is addressed throughout several sections of the Settlement, most explicitly in Sections II.A., B., C., D., and E., pages 7-13, of the Settlement.

Affiliated Interest Agreements

10. Are the proposed affiliated interest agreements and cost allocation proposals reasonable and consistent with the public interest under Section 2102(b) of the Public Utility Code?

PREA took no specific position on this issue in litigation. However, affiliate relations are addressed in Section II.M., page 29, of the Settlement.

Impact on Competition

11. Investigate the impact the proposed merger may have on the potential for anticompetitive behavior per 66 Pa. C.S. § 2811(e)(1). How will the merger affect wholesale and retail competition for power/electric generation and transmission?

PREA took no specific position on this issue in litigation. However, competitive issues are addressed in Sections II.I., and K., pages 16-21, and 27-29, of the Settlement.

Transmission Projects

12. How will transmission projects in the western part of the state be affected by the merger?

PREA took no specific position on this issue in litigation and is not in a position to submit a response here.

Before the
PENNSYLVANIA PUBLIC UTILITY COMMISSION

RECEIVED
2010 OCT 28 PM 3:26
SECRETARY'S BUREAU

Joint Application of West Penn Power :
Company d/b/a Allegheny Power, Trans- :
Allegheny Interstate Line Company and :
FirstEnergy Corp. for a Certificate of : Docket Nos. A-2010-2176520
Public Convenience Under Section : A-2010-2176732
1102(A)(3) of the Public Utility Code :
Approving A Change of Control of West :
Penn Power Company and Trans- :
Allegheny Interstate Line Company :
:

CERTIFICATE OF SERVICE

I hereby certify that I have on this 28th day of October, 2010, served a true and correct copy of the foregoing document upon the persons and in the manner listed below, as follows:

VIA EMAIL AND FIRST CLASS MAIL, POSTAGE PREPAID

Honorable Wayne L. Weismandel
Administrative Law Judge
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street
P. O. Box 3265
Harrisburg, PA 17105-3265
wweismande@state.pa.us

Honorable Mary D. Long
Administrative Law Judge
Pennsylvania Public Utility Commission
Piatt Place
301 Fifth Avenue, Room 220
Pittsburgh, PA 15222
malong@state.pa.us

Darryl A. Lawrence, Esquire
Tanya J. McCloskey, Esquire
Assistant Consumer Advocates
Office of Consumer Advocate
555 Walnut Street
Forum Place, 5th Floor
Harrisburg, PA 17101-1923
dlawrence@paoca.org
TMcCloskey@paoca.org
Counsel for Office of Consumer Advocate

Daniel G. Asmus, Esquire
Office of Small Business Advocate
Suite 1102, Commerce Building
300 North Second Street
Harrisburg, PA 17101
dasmus@state.pa.us
willoyd@state.pa.us
Counsel for Office of Small Business Advocate

Allison C. Kaster, Esquire
Carrie B. Wright, Esquire
Office of Trial Staff
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
P. O. Box 3265
Harrisburg, PA 17105-3265
akaster@state.pa.us
carwright@state.pa.us
josimms@state.pa.us
Counsel for the Office of Trial Staff

Thomas J. Sniscak, Esquire
Todd S. Stewart
William E. Lehman
Hawke McKeon & Sniscak LLP
P.O. Box 1778
100 North Tenth Street
Harrisburg, PA 17105
tjsniscak@hmslegal.com
tsstewart@hmslegal.com
welehman@hmslegal.com
Counsel for Pennsylvania State University

VIA EMAIL ONLY

Thomas P. Gadsden, Esquire
Kenneth M. Kulak, Esquire
Morgan, Lewis & Bockius, LLP
1701 Market Street
Philadelphia, PA 19103-2921
tgadsden@MorganLewis.com
kkulak@morganlewis.com
Counsel for FirstEnergy

Wendy E. Stark, Esquire
Bradley E. Bingaman, Esquire
FirstEnergy Service Co.
P.O. Box 16001
Reading, PA 19612-6001
starkw@firstenergycorp.com
bingamanb@firstenergycorp.com
Counsel for FirstEnergy Corporation

Scott J. Rubin, Esquire
333 Oak Lane
Bloomsburg, PA 17815
Scott.J.Rubin@gmail.com
Counsel for International Brotherhood of Electrical Workers

Theodore Robinson, Esquire
Citizen Power
2121 Murray Avenue
Pittsburgh, PA 15217
robinson@citizenpower.com
Counsel for Citizen Power

W. Edwin Ogden, Esquire
Alan Michael Seltzer, Esquire
Ryan, Russell, Ogden and Seltzer, PC
1150 Berkshire Boulevard, Suite 210
Wyomissing, PA 19610-1208
eoogden@ryanrussell.com
aseltzer@ryanrussell.com
Counsel for West Penn Power Company and Trans-Allegheny Interstate Line Company

Randall B. Palmer, Esquire
Jennifer L. Petisek, Esquire
Allegheny Energy, Inc.
800 Cabin Hill Drive
Greensburg, PA 15601
rpalmer@alleghenyenergy.com
jpetrisek@alleghenyenergy.com
Counsel for West Penn Power Company and Trans-Allegheny Interstate Line Company

Michael W. Gang, Esquire
Anthony D. Kanagy
Post & Schell
17 North Second Street, 12th Floor
Harrisburg, PA 17101-1601
mgang@postschell.com
akanagy@postschell.com
Counsel for Duquesne Light Company

Gary A. Jack, Esquire
Kelly L. Geer, Esquire
Duquesne Light Company
411 Seventh Avenue, 16-4
Pittsburgh, PA 15218
gjack@duqlight.com
kgeer@duqlight.com
Counsel for Duquesne Light Company

Kurt E. Klappkowski, Esquire
Commonwealth of Pennsylvania
Department of Environmental Protection
RCSOB, 9th Floor
400 Market Street
Harrisburg, PA 17101-2301
kklappkowski@state.pa.us
*Counsel for Pennsylvania Department of
Environmental Protection*

Stephen H. Jordan, Esquire
Rothman Gordon, P.C.
3rd Floor, Grant Building
310 Grant Street
Pittsburgh, PA 152119
shjordan@rothmangordon.com
*Counsel for Utility Workers Union of
America, AFL-CIO and UWUA System
Local No. 102*

Benjamin L. Willey, Esquire
Law Offices of Benjamin L. Willey, LLC
7272 Wisconsin Avenue
Suite 300
Bethesda, MD 20814
blw@bwilleylaw.com
*Counsel for York County Solid Waste and
Refuse Authority*

David Fein, Esquire
Vice President, Energy Policy
Director of Retail Energy Policy
Constellation Energy
550 West Washington Boulevard
Suite 300
Chicago, IL 60661
David.Fein@Constellation.com
Counsel for Constellation Energy

John K. Baillie, Esquire
Charles McPhedran, Esquire
Citizens for Pennsylvania's Future
425 Sixth Avenue, Suite 2770
Pittsburgh, PA 15219
Baillie@pennfuture.org
McPhedran@pennfuture.org
Counsel for Citizens for PennFuture

Joseph Otis Minott, Esquire
Eric Paul Cheung, Esquire
Clean Air Council
135 S. 19th Street, Suite 300
Philadelphia, PA 19103
Joe_minott@cleanair.org
echeung@cleanair.org
Counsel for Clean Air Council

Scott H. Strauss, Esquire
Katharine M. Mapes, Esquire
Spiegel & McDiarmid, LLP
1333 New Hampshire Avenue, NW
Washington, DC 20036
scott.strauss@spiegelmc.com
katharine.mapes@spiegelmc.com
*Counsel for Utility Workers Union of
America, AFL-CIO and UWUA System
Local No. 102*

Robert M. Strickler, Esquire
Griffith, Strickler, Lerman, Solymos
& Calkins
110 S. Northern Way
York, PA 17402-3737
rstrickler@qslsc.com
*Counsel for York County Solid Waste and
Refuse Authority*

Divesh Gupta, Esquire
Constellation Energy
111 Market Place, Suite 500
Baltimore, MD 21202
divesh.gupta@constellation.com
Counsel for Constellation Energy

Derrick Price Williamson, Esquire
Spilman Thomas & Battle, PLLC
1100 Bent Creek Boulevard, Suite 01
Mechanicsburg, PA 17050
dwilliamson@spilmanlaw.com
*Counsel for Pennsylvania Mountains
Healthcare Alliance*

Susan E. Bruce, Esquire
Charis Mincavage, Esquire
Vasiliki Karandrikas, Esquire
Carl J. Zwick, Esquire
McNees Wallace & Nurick LLC
P.O. Box 1166
Harrisburg, PA 17108-1166
sbruce@mwn.com
vkandrikas@mwn.com
czwick@mwn.com
*West Penn Power Industrial Intervenors
and Counsel for Met-Ed Industrial Users
Group and the Penelec Industrial
Customer Alliance*

David J. Dulick, Esquire
General Counsel
Continental Cooperative Services
Pennsylvania Rural Electric Association
Allegheny Electric Cooperative, Inc.
212 Locust Street
Harrisburg, PA 17101
david_dulick@prea.com
*Counsel for Pennsylvania Rural Electric
Association*

Regina L. Matz, Esquire
Thomas T. Niesen, Esquire
Thomas, Long, Niesen & Kennard
P.O. Box 9500
Harrisburg, PA 17108-9500
rmatz@thomaslonglaw.com
tniesen@thomaslonglaw.com
Counsel for ARIPPA

Jeff A. McNelly, Executive Director
ARIPPA
2015 Chestnut Street
Camp Hill, PA 17011
jamcnelly1@arippa.org

Richard Hahn
LaCapra Associates
rhahn@lacapra.com

Daniel Clearfield, Esquire
Deanne M. O'Dell, Esquire
Carl R. Schultz, Esquire
Eckert Seamans Cherin & Mellott, LLC
213 Market Street, 8th Floor
Harrisburg, PA 17101-2132
dclearfield@eckertseamans.com
dodell@eckertseamans.com
cshultz@eckertseamans.com
Direct Energy Services, Inc. and RESA

Charles E. Thomas, Jr., Esquire
Jennifer M. Sultzaberger, Esquire
Thomas, Long, Niesen & Kennard
P.O. Box 9500
Harrisburg, PA 17108-9500
cthomasjr@thomaslonglaw.com
tniesen@thomaslonglaw.com
*Counsel for Pennsylvania Rural Electric
Association*

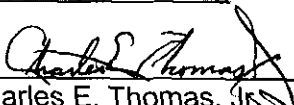
Thomas T. Niesen, Esquire
Charles E. Thomas, Jr., Esquire
Thomas, Long, Niesen & Kennard
P.O. Box 9500
Harrisburg, PA 17108-9500
tniesen@thomaslonglaw.com
cthomasjr@thomaslonglaw.com
*Counsel for West Penn Power
Sustainable Energy Fund*

David Vollero
Executive Director YCSWA
d.vollero@ycswa.com

James L. Crist
The Lumen Group, Inc.
jcrist@aol.com

Barbara Alexander
barbalex@ctel.net

Jessica J. Horner
jhorner@paoca.org



Charles E. Thomas, Jr.
PA Attorney I.D. No. 07262