



100 Pine Street • PO Box 1166 • Harrisburg, PA 17108-1166
Tel: 717.232.8000 • Fax: 717.237.5300

Pamela C. Polacek
Direct Dial: 717.237.5368
Direct Fax: 717.260.1736
ppolacek@mwn.com

August 28, 2012

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor
Harrisburg, PA 17120

VIA ELECTRONIC FILING

RE: Joint Petition for Generic Investigation or Rulemaking Regarding "Gas-on-Gas" Competition Between Jurisdictional Natural Gas Distribution Companies; Docket No. P-2011-2277868

Generic Investigation Regarding Gas-on-Gas Competition Between Jurisdictional Natural Gas Distribution Companies; Docket No. I-2012-2320323


Dear Secretary Chiavetta:

Please find enclosed for filing with the Pennsylvania Public Utility Commission ("PUC" or "Commission") the signed original of the Petition to Intervene of the Industrial Energy Consumers of Pennsylvania ("IECPA") in the above-referenced proceeding.

As evidenced by the attached Certificate of Service, all parties to the proceeding are being duly served with a copy of this document. Please date stamp the extra copy of this transmittal letter and Petition to Intervene, and kindly return them to our messenger for our filing purposes.

Very truly yours,

McNEES WALLACE & NURICK LLC

By 
Pamela C. Polacek

Counsel to the Industrial Energy Consumers of Pennsylvania

PCP/sar
Enclosures

c: Administrative Law Judge Elizabeth H. Barnes (via Hand Delivery)
Certificate of Service

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**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Joint Petition for Generic Investigation or	:	
Rulemaking Regarding "Gas-On-Gas" Competition	:	Docket No. P-2011-2277868
Between Jurisdictional Natural Gas Distribution	:	
Companies	:	
	:	
Generic Investigation Regarding Gas-On-Gas	:	
Competition Between Jurisdictional Natural	:	Docket No. I-2012-2320323
Gas Distribution Companies	:	
	:	

**PETITION TO INTERVENE OF THE
INDUSTRIAL ENERGY CONSUMERS OF PENNSYLVANIA**

TO THE HONORABLE, THE PENNSYLVANIA PUBLIC UTILITY COMMISSION:

Pursuant to Sections 5.71-5.74 of the Pennsylvania Public Utility Commission's ("PUC" or "Commission") Regulations, 52 Pa. Code §§ 5.71-5.74, the Industrial Energy Consumers of Pennsylvania ("IECPA") hereby submit this Petition to Intervene in the above-captioned proceeding. In support thereof, IECPA avers as follows:

1. Petitioner is IECPA, which is an organization of energy-intensive businesses and organizations located in the Commonwealth of Pennsylvania. The members of IECPA for purposes of this proceeding are listed in Attachment "A" to this Petition, which will be updated if necessary during this matter.

2. The names and address of IECPA's attorneys are:

Pamela C. Polacek (Pa. I.D. No. 78276)
Charis Mincavage (Pa. I.D. No. 82039)
Teresa K. Schmittberger (Pa. I.D. No. 311082)
McNees Wallace & Nurick LLC
100 Pine Street
P.O. Box 1166
Harrisburg, PA 17108
Phone: 717.232.8000
Fax: 717.237.5300
ppolacek@mwn.com
cmincavage@mwn.com
tschmittberger@mwn.com

3. On December 8, 2011, the Bureau of Investigation and Enforcement ("I&E"), Office of Consumer Advocate ("OCA"), Office of Small Business Advocate ("OSBA"), Peoples TWP LLC ("Peoples TWP"), and Peoples Natural Gas Company LLC ("Peoples") (collectively, "Joint Parties"), filed with the Commission a Joint Petition for Generic Investigation or Rulemaking Regarding "Gas-on-Gas Competition" Between Jurisdictional Natural Gas Distribution Companies ("Petition"). Through this Petition, the Joint Parties requested that the Commission institute a rulemaking or investigation into gas-on-gas competition issues, particularly into the practice of rate flexing.

4. On December 28, 2011, IECPA submitted an Answer not opposing a rulemaking or investigation, and supporting continued rate flexing as consistent with Pennsylvania regulations and facilitating economic growth in the Commonwealth.

5. On July 25, 2012, the Commission issued a Secretarial Letter instituting a generic investigation regarding gas-on-gas competition issues, including rate flexing. In addition, the Commission assigned this matter to the Office of Administrative Law Judge ("OALJ") for disposition and resolution.

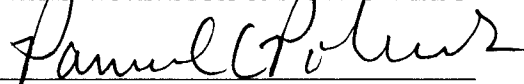
6. IECPA is an association of energy-intensive customers of natural gas and electricity. IECPA members annually consume large amounts of natural gas, which represent a significant cost of production and operation for these members. Because of the significant amount of natural gas used by IECPA members, any modification to PUC policy regarding natural gas rates and regulation could impact IECPA.

7. IECPA members may be directly affected by the Commission's resolution of the above-captioned proceeding. As some of the largest natural gas customers throughout the Commonwealth, IECPA members have an interest in this proceeding that is not represented by any other party of record; consequently, IECPA satisfies the standards for intervention under Section 5.72 of the Commission's regulations. See 52 Pa. Code § 5.72.

WHEREFORE, the Industrial Energy Consumers of Pennsylvania respectfully request that the Commission grant this Petition to Intervene and provide the Industrial Energy Consumers of Pennsylvania with full-party status in this proceeding.

Respectfully submitted,

McNEES WALLACE & NJRICK LLC

By 
Pamela C. Polacek (Pa. I.D. No. 78276)
Charis Mincavage (Pa. I.D. No. 82039)
Teresa K. Schmittberger (Pa. I.D. No. 311082)
100 Pine Street
P.O. Box 1166
Harrisburg, PA 17108-1166
Phone: (717) 232-8000
Fax: (717) 237-5300

Counsel to the Industrial Energy Consumers of
Pennsylvania

Dated: August 28, 2012

ATTACHMENT "A"

INDUSTRIAL ENERGY CONSUMERS OF PENNSYLVANIA

Air Liquide Industrial U. S.
Air Products and Chemicals, Inc.
AK Steel Corporation
Alcoa, Inc.
Allegheny Technologies Incorporated
ArcelorMittal Steel, USA
Armstrong World Industries, Inc.
Benton Foundry, Inc.
Carpenter Technology Corp.
Colonial Metals Company
Ervin Industries, Inc.
Glen Gery Corporation
Knouse Foods Cooperative, Inc.
Linde Energy Services, Inc.
MERSEN USA St. Marys-PA Corp.
Nova Chemicals
Praxair, Inc.
Standard Steel
The Dow Chemical Company
The Hershey Company
The Procter & Gamble Paper Products Company
World Kitchen Inc.

CERTIFICATE OF SERVICE

I hereby certify that I am this day serving a true copy of the foregoing document upon the participants listed below in accordance with the requirements of 52 Pa. Code Section 1.54 (relating to service by a participant).

VIA E-MAIL AND FIRST CLASS MAIL

Allison Kaster, Esquire
Pennsylvania Public Utility Commission
Bureau of Investigation and Enforcement
Commonwealth Keystone Building
400 North Street, 2nd Floor West
Harrisburg, PA 17105
akaster@pa.gov

Tanya J. McCloskey, Esquire
Shaun A. Sparks, Esquire
James A. Mullins, Esquire
Pennsylvania Public Utility Commission
Office of Consumer Advocate
555 Walnut Street
Forum Place, 5th Floor
Harrisburg, PA 17101
tmccloskey@paoca.org
ssparks@paoca.org
jmullins@paoca.org

Steven C. Gray, Esquire
Elizabeth Rose Triscari, Esquire
Sharon E. Webb, Esquire
Pennsylvania Public Utility Commission
Office of Small Business Advocate
300 North Second Street, Suite 1102
Harrisburg, PA 17101
sgray@pa.gov
etriscari@pa.gov
swebb@pa.gov

Theodore J. Gallagher, Esquire
Nisource Corporate Services Company
121 Champion Way, Suite 100
Canonsburg, PA 15317
tjgallagher@nisource.com
*Counsel for Columbia Gas of Pennsylvania,
Inc.*

Mark C. Morrow, Esquire
UGI Corporation
460 North Gulph Road
King of Prussia, PA 19406
morrowm@ugicorp.com

William H. Roberts, II, Esquire
Peoples Natural Gas Company LLC
375 North Shore Drive, Suite 600
Pittsburgh, PA 15212
william.h.roberts@peoples-gas.com

Jay W. Dawson, Esquire
Peoples TWP LLC
205 North Main Street
Butler, PA 16001
Jay.Dawson@peoplestwp.com

Maureen Geary Krowicki, Esquire
National Fuel Gas Distribution Corporation
PO Box 2081
1100 State Street
Erie, PA 16512
krowickim@natfuel.com

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

Certificate of Service

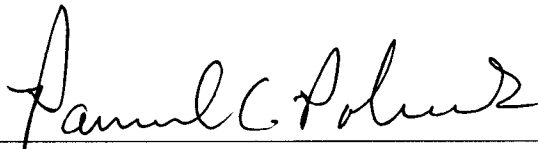
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Michael S. Swerling, Esquire
Exelon Business Services Company
2301 South Market Street, S23-1
Philadelphia, PA 19101
michael.swerling@exeloncorp.com
Counsel for PECO Energy Company

David W. Gray, Esquire
Equitable Gas Company, LLC
225 North Shore Drive
Pittsburgh, PA 15212
dgray@equitablegas.com

Charles E. Thomas, Jr., Esquire
Thomas T. Niesen, Esquire
Thomas, Long, Niesen & Kennard
212 Locust Street
P. O. Box 9500
Harrisburg, PA 17108-9500
cthomasjr@thomaslonglaw.com
tniesen@thomaslonglaw.com
Counsel for Equitable Gas Company, LLC



Pamela C. Polacek

Counsel to the Industrial Energy Consumers of
Pennsylvania

Dated this 28th day of August, 2012, at Harrisburg, Pennsylvania