

COMMONWEALTH OF PENNSYLVANIA



OFFICE OF CONSUMER ADVOCATE

555 Walnut Street, 5th Floor, Forum Place
Harrisburg, Pennsylvania 17101-1923
(717) 783-5048
800-684-6560 (in PA only)

FAX (717) 783-7152
consumer@paoca.org

IRWINA. POPOWSKY
Consumer Advocate

August 30, 2012

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17101

Re: Joint Petition of Metropolitan Edison
Company, Pennsylvania Electric Company,
Pennsylvania Power Company and West
Penn Power Company for an Evidentiary
Hearing on the Energy Efficiency
Benchmarks For the Period June 1, 2013
through May 31, 2016
Docket Nos. P-2012-2320450; P-2012-
2320468; P-2012-2320480; P-2012-2320484

Dear Secretary Chiavetta:

Enclosed please find the Office of Consumer Advocate's Notice of Intervention and Public Statement in the above-captioned proceeding.

Copies have been served upon all parties of record as shown on the attached Certificate of Service.

Sincerely,

A handwritten signature in cursive script that reads "Christy M. Appleby".

Christy M. Appleby
Assistant Consumer Advocate
PA. Attorney ID# 85824

Enclosures

cc: Hon. Elizabeth H. Barnes, ALJ
Kriss E. Brown, Law Bureau
Office of Special Assistants

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BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Joint Petition of Metropolitan Edison Company, :
Pennsylvania Electric Company, :
Pennsylvania Power Company and : Docket Nos. P-2012-2320450
West Penn Power Company for an Evidentiary : P-2012-2320468
Hearing on the Energy Efficiency Benchmarks : P-2012-2320480
For the Period June 1, 2013 through May 31, 2016 : P-2012-2320484

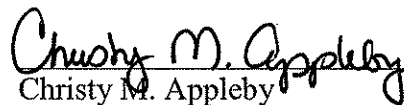
NOTICE OF INTERVENTION
OF THE
OFFICE OF CONSUMER ADVOCATE

Pursuant to 52 Pa. Code Sections 5.71-74, the Office of Consumer Advocate hereby gives Notice of Intervention in the above-captioned proceeding. A copy of all correspondence, notices, documents, orders or other communications with respect to the above-captioned proceeding should be addressed to the following:

Christy M. Appleby
Assistant Consumer Advocate
Pa. Attorney Id. No. 85824
E-mail: cappleby@paoca.org
Candis A. Tunilo
Assistant Consumer Advocate
Pa. Attorney Id. No. 89891
E-mail: ctunilo@paoca.org

Office of Consumer Advocate
5th Floor, Forum Place
555 Walnut Street
Harrisburg, Pa. 17101-1923
Telephone: (717) 783-5048

Respectfully submitted,


Christy M. Appleby
Assistant Consumer Advocate
Pa. Attorney Id. No. 85824

Date: August 30, 2012

PUBLIC STATEMENT OF THE
OFFICE OF CONSUMER ADVOCATE
PURSUANT TO 71 P.S. SECTION 309-4(e)

Act 161 of the General Assembly, 71 P.S. §09-2, as enacted July 9, 1976, authorizes the Consumer Advocate to represent the interests of consumers before the Pennsylvania Public Utility Commission (PUC or Commission). In accordance with Act 161, and for the following reasons, the Consumer Advocate determined to Intervene in the Joint Petition of Metropolitan Edison Company, Pennsylvania Electric Company, Pennsylvania Power Company and West Penn Power Company for an Evidentiary Hearing on the Energy Efficiency Benchmarks Established for the Period June 1, 2013 through May 31, 2016 at Docket No. P-2012-2320450.

On August 20, 2012, Metropolitan Edison Company, Pennsylvania Electric Company, Pennsylvania Power Company, and West Penn Power Company (collectively the Companies) filed a Joint Petition for an Evidentiary Hearing on the Energy Efficiency Benchmarks Established for the Period June 1, 2013 through May 31, 2016. The Companies' Petition was filed in response to the Commission's August 3, 2012 Implementation Order at Docket No. M-2012-2284911. Pursuant to Act 129 of 2008 (Act 129), 66 Pa. C.S. § 2801, *et seq.*, the August 3, 2012 Implementation Order established the requirements for Phase II of the Act 129 Energy Efficiency and Conservation Plans, including the establishment of new energy efficiency consumption reduction targets for the period June 1, 2013 through May 31, 2016. The August 3, 2012 Implementation Order stated that an Electric Distribution Company could submit a Petition for Evidentiary Hearing by no later than August 20, 2012 for the limited purpose of challenging these consumption reduction requirements. If no Petition was filed, the consumption reduction requirements would be deemed accepted. August 3, 2012 Implementation Order at 31.

The Companies have filed the instant Petition for Evidentiary Hearing to challenge the consumption reduction requirements. Joint Petition at 3. On August 20, 2012, the Companies also filed a Petition for Reconsideration of the August 3, 2012 Implementation Order.

The OCA submits that the scope of this proceeding should be limited to the evaluation of the proposed consumption reduction requirements pursuant to the August 3, 2012 Implementation Order. The Consumer Advocate determined to intervene in this proceeding to protect the interests of the Companies' customers and to ensure that any energy efficiency benchmarks established are in accordance with Act 129 and all other applicable, statutes, regulations and case law.

CERTIFICATE OF SERVICE

Re: Joint Petition of Metropolitan Edison Company, Pennsylvania electric Company, Pennsylvania Power Company and West Penn Power Company for an Evidentiary Hearing on the Energy Efficiency Benchmarks For the Period June 1, 2013 through May 31, 2016
Docket Nos. P-2012-2320450; P-2012-2320468; P-2012-2320480; P-2012-2320484

I hereby certify that I have this day served a true copy of the foregoing document, the Office of Consumer Advocate's Notice of Intervention and Public Statement, upon parties of record in this proceeding in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant), in the manner and upon the persons listed below:

Dated this 30th day of August 2012.

SERVICE BY E-MAIL & INTER-OFFICE MAIL


Johnnie Simms, Esq.
Bureau of Investigation & Enforcement
Pennsylvania Public Utility Commission
Commonwealth Keystone Bldg.
P.O. Box 3265
Harrisburg, PA 17120

Shaun A. Sparks, Esq.
Law Bureau
Pennsylvania Public Utility Commission
Commonwealth Keystone Bldg.
P.O. Box 3265
Harrisburg, PA 17120

SERVICE BY E-MAIL & FIRST CLASS MAIL, POSTAGE PREPAID

Kathy J. Kolich, Esq.
FirstEnergy Service Company
76 S. Main Street
Akron, OH 44308

Steven Gray, Esq.
Office of Small Business Advocate
Suite 1102, Commerce Bldg.
300 North Second Street
Harrisburg, PA 17101


Christy M. Appleby
PA Attorney I.D. # 85824
Email: CAAppleby@paoca.org
Candis A. Tunilo
Assistant Consumer Advocate
PA Attorney I.D. # 89891
Email: CTunilo@paoca.org

Counsel for
Office of Consumer Advocate
555 Walnut Street 5th Floor, Forum Place
Harrisburg, PA 17101-1923
Phone: (717) 783-5048
Fax: (717) 783-7152
*160209