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August 30, 2012

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

VIA HAND DELIVERY

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 Established for the Period June 1, 2013 through May 31, 2016; Docket Nos. P-2012-2320450, P-2012-2320468, P-2012-2320480, and P-2012-2320484


Dear Secretary Chiavetta:

Please find enclosed for filing with the Pennsylvania Public Utility Commission ("PUC" or "Commission") the signed original of the Joint Petition to Intervene of the Met-Ed Industrial Users Group ("MEIUG"), the Penelec Industrial Customer Alliance ("PICA"), the Penn Power Users Group ("PPUG"), and the West Penn Power Industrial Intervenors ("WPPII") 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 Joint Petition to Intervene, and kindly return them to our messenger for our filing purposes.

Sincerely,

McNEES WALLACE & NURICK LLC

By 
Charis Mincavage

Counsel to the Met-Ed Industrial Users Group,
the Penelec Industrial Customer Alliance,
the Penn Power Users Group, and
the West Penn Power Industrial Intervenors

CM/leh

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

**JOINT PETITION TO INTERVENE OF
THE MET-ED INDUSTRIAL USERS GROUP,
THE PENELEC INDUSTRIAL CUSTOMER ALLIANCE,
THE PENN POWER USERS GROUP, AND
THE WEST PENN POWER INDUSTRIAL INTERVENORS**

TO THE HONORABLE, THE PENNSYLVANIA PUBLIC UTILITY COMMISSION:

Pursuant to Sections 5.71 through 5.74 of the Pennsylvania Public Utility Commission's ("PUC" or "Commission") Regulations, 52 Pa. Code §§ 5.71-5.74, the Med-Ed Industrial Users Group ("MEIUG"), the Penelec Industrial Customer Alliance ("PICA"), the Penn Power Users Group ("PPUG"), and the West Penn Power Industrial Intervenors ("WPPII") (collectively, "Industrial Customer Groups") hereby file this Joint Petition to Intervene in the above-captioned proceeding. In support thereof, the Industrial Customer Groups state as follows:

1. Petitioners are MEIUG, PICA, PPUG, and WPPII. The compositions of MEIUG, PICA, PPUG, and WPPII are attached hereto as Appendix A, Appendix B, Appendix C, and Appendix D, respectively. MEIUG, PICA, PPUG, and WPPII reserve the right to modify these Appendices throughout the course of this proceeding, as necessary.

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2. The names and address of Petitioners' attorneys are:

Susan E. Bruce (I.D. No. 80146)
Charis Mincavage (I.D. No. 82039)
Vasiliki Karandrikas (I.D. No. 89711)
Teresa K. Schmittberger (I.D. No. 311082)
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3. On August 3, 2012, the Commission issued its Energy Efficiency and Conservation ("EE&C") Phase II Implementation Order ("I.O.") at Docket Nos. M-2012-2289411 and M-2008-2069887, tentatively adopting, among other things, Electric Distribution Company ("EDC")-specific consumption reduction targets for the period June 1, 2013, through May 31, 2016. The I.O. indicated that an EDC could contest its specific targets by filing a petition for evidentiary hearing by August 20, 2012. If the EDC did not contest, the target would become final. In addition, the I.O. noted that parties could submit petitions to intervene within ten days of an EDC filing a petition for evidentiary hearing.

4. On August 20, 2012, Metropolitan Edison Company ("Met-Ed"), Pennsylvania Electric Company ("Penelec"), Pennsylvania Power Company ("Penn Power"), and West Penn Power Company ("West Penn") (collectively, "Companies") submitted to the Commission a Joint Petition for an Evidentiary Hearing challenging the energy efficiency ("EE") benchmarks established in the I.O. ("Joint Petition"). Specifically, the Companies indicated that they cannot be certain if these energy efficiency benchmarks can be achieved until after certain assessments

occur. In order to preserve their rights to challenge the energy efficiency benchmarks set forth in the I.O., the Companies submitted their Petition.

5. The Industrial Customer Groups are ad hoc associations of energy-intensive commercial and industrial customers receiving electric service in the Companies' service territories. As some of the Companies' largest customers, whose manufacturing processes require significant amounts of electricity, any proposed modifications to the Companies' EE&C Plans could significantly impact the Industrial Customer Groups' production costs. Accordingly, if the Companies determine, after the proposed assessments, that these benchmarks are not appropriate and seek modifications, the Industrial Customers Groups must preserve their ability to fully participate in any such evidentiary hearings.

6. Therefore, consistent with 52 Pa. Code § 5.72(a), the Industrial Customer Groups have a significant interest in this proceeding that is not represented by any other party of record. Accordingly, the Industrial Customer Groups should be granted intervenor status in this proceeding.

WHEREFORE, the Met-Ed Industrial Users Group, the Penelec Industrial Customer Alliance, the Penn Power Users Group, and the West Penn Power Industrial Intervenors respectfully request that the Commission grant this Joint Petition to Intervene and provide the Met-Ed Industrial Users Group, the Penelec Industrial Customer Alliance, the Penn Power Users Group, and the West Penn Power Industrial Intervenors with full-party status in this proceeding.

Respectfully submitted,

McNEES WALLACE & NURICK LLC

By 

Susan E. Bruce (Pa. I.D. No. 80146)

Charis Mincavage (Pa. I.D. No. 82039)

Vasiliki Karandrikas (Pa. I.D. No. 89711)

Teresa K. Schmittberger (Pa. I.D. No. 311082)

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Counsel to the Met-Ed Industrial Users Group, the Penelec Industrial Customer Alliance, the Penn Power Users Group, and the West Penn Power Industrial Intervenors

Dated: August 30, 2012

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APPENDIX A

MET-ED INDUSTRIAL USERS GROUP

Air Liquide Industrial U.S. LP
Carpenter Technology Corporation
Dixie Consumer Products, LLC, Lehigh Valley
East Penn Manufacturing Company, Inc.
Exide Technologies, Inc.
Farmers Pride, Inc.
Glen-Gery Corporation
Harley-Davidson Motor Company – York Division
Knouse Foods Cooperative, Inc.
Magnesita Refractories Co.
PPG Industries, Inc.
RH Sheppard Co., Inc.
Royal Green LLC
Sweet Street Desserts, Inc.

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APPENDIX B

PENELEC INDUSTRIAL CUSTOMER ALLIANCE

American Refining Group Inc.
Appleton Papers Inc.
E.I. du Pont de Nemours & Co., Inc.
Electralloy, a G.O. Carlson, Inc., Co.
Ellwood National Steel
Eric Forge & Steel, Inc.
Glen-Gery Corporation
Pittsburgh Glass Works, L.L.C.
Procter & Gamble Paper Products Company
Sheetz, Inc.
Standard Steel
Team Ten, LLC - American Eagle Paper Mills
The Plastek Group
U.S. Silica Company
Wegmans Food Markets, Inc.

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APPENDIX C

PENN POWER USERS GROUP

Ellwood Quality Steel

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APPENDIX D

WEST PENN POWER INDUSTRIAL INTERVENORS

Air Liquide Industrial U.S. LP
Air Products & Chemicals, Inc.
ATI Allegheny Ludlum Corporation
Ervin Industries
INDSPEC Chemical Corporation
Latrobe Specialty Steel Company
Lehigh Specialty Melting Inc. (Whemco)
MERSEN USA St Marys-PA Corp.
Sheetz, Inc.
World Kitchen LLC

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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).

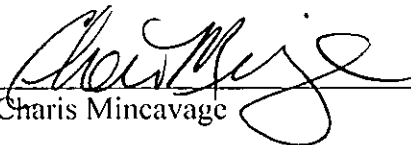
VIA E-MAIL AND FIRST-CLASS MAIL

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Counsel to the Met-Ed Industrial Users Group,
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the Penn Power Users Group, and
the West Penn Power Industrial Intervenors

Dated this 30th day of August, 2012, at Harrisburg, Pennsylvania

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