

Citizens for Pennsylvania's Future
200 First Avenue, Suite 200
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(412) 456-2901

October 3, 2014

Secretary Rosemary Chiavetta
Pennsylvania Public Utility Commission
400 North Street, 2nd Floor North
P.O. Box 3265
Harrisburg, PA 17015-3265

Re: Petition of Metropolitan Edison Company for approval of Base Rate Increase and various Riders, Docket No. R-2014-2428745

Dear Secretary Chiavetta:

Enclosed, please find an original copy of the Join Petition to Intervene in the above captioned matter.

Copies are being served in accordance with the attached Certificate of Service.

Sincerely,



Heather M. Langeland

cc. Certificate of Service

First Energy Service Company
2800 Pottsville Pike
P.O. Box 16001
Reading, PA 19612-6001

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Senate of Pennsylvania – 46th District
Senate Box 203046
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Heather M. Langeland

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

PENNSYLVANIA PUBLIC	:	
UTILITY COMMISSION,	:	
	:	
	:	Docket No. R-2014-2428745
v.	:	
	:	
	:	
METROPOLITAN EDISON COMPANY	:	

**JOINT PETITION TO INTERVENE OF
ENVIRONMENTAL DEFENSE FUND AND
CITIZENS FOR PENNSYLVANIA’S FUTURE**

Now comes Environmental Defense Fund (“EDF”), by counsel, Michael Panfil, and Citizens for Pennsylvania’s Future (“PennFuture”), by counsel, Heather M. Langeland, and hereby Petitions to Intervene in the above captioned matter. Petitioners request that the Pennsylvania Public Utility Commission (“Commission”) grant Petitioners status as Intervenors in this proceeding concerning the Petition of Metropolitan Edison Company (“MEC”) for approval of Base Rate Increase and various Riders (“Petition”).

PETITION TO INTERVENE

Petitioners provide the following in support of their Petition to Intervene:

1. Petitioner, EDF, is an international nonprofit corporation headquartered in New York, New York (www.edf.org). EDF has 14, 775 members living in Pennsylvania, and 328,490 members nationwide. EDF has members living in MEC’s service territory that would be impacted by MEC’s Petition. EDF engages in policy development,

public education, litigation and other actions to achieve its goals, including the promotion of clean energy resources and technologies.

2. Petitioner, PennFuture, is a statewide environmental advocacy organization with offices in Harrisburg, Philadelphia, Pittsburgh and Wilkes-Barre. PennFuture has members living in MEC's service territory that would be impacted by MEC's Petition.

3. The name and address of counsel for Petitioners is:

Michael Panfil
John Finnigan
(admissions *pro hac vice* pending)
EDF
1875 Connecticut Ave., N.W.
Washington, DC 20009
Phone: (202) 572-3280
Fax: (202) 234-6049
mpanfil@edf.org

Heather M. Langeland
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4. On or about August 4, 2014, MEC, pursuant to Section 1308 of the Pennsylvania Public Utility Code, 66 Pa.C.S. 1308, petitioned the Commission for approval of a Base Rate Increase and various Riders.

5. The rate increase proposed by MEC would increase rates across its service territory. Petitioners, on behalf of their members and the public interest, have an interest in ensuring that the MEC plans maximize cost-effective, clean energy.

6. Petitioners have a right and interest in assuring safe, reliable, clean and affordable public utility service, and participation in this Proceeding is an appropriate way to protect these rights and interest. Petitioners may intervene in this proceeding pursuant to 52 Pa. Code 5.71-74.
7. Petitioners have interests in and perspectives on issues in this proceeding that are not adequately represented by other parties of record, including but not limited to: rate design, distribution grid planning and modernization, distributed generation policy, smart grid planning and functionality, TOU rate design, net metering, customer utilization of advanced grid functionality, utility performance incentives, energy efficiency and demand response, LED lighting, cost-benefit analysis policy, third-party access to energy usage data, and other issues.
8. Petitioners intend to review and analyze MEC's Petition as it pertains to rates within its utility service territory. The variety and type of tariffs and riders proposed will directly impact Petitioners' members' interests in ensuring cost effective clean energy development.
9. 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.
10. All documents and correspondence in this proceeding should be addressed to:

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11. For the foregoing reasons, Petitioners request that the Commission grant this
Petition and confer status as Intervenors in this Proceeding.

CONCLUSION

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

Respectfully Submitted,

 (by HTML)

Michael Panfil

John Finnigan

EDF

1875 Connecticut Ave., N.W.

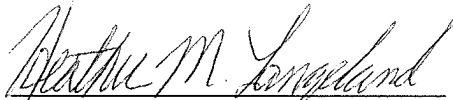
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Counsel for Petitioner EDF



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Counsel for Petitioner PennFuture

DATED: October 3, 2014