

Citizens for Pennsylvania's Future  
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October 3, 2014

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

Re: Petition of West Penn Power Company for approval of Base Rate Increase and various Riders, Docket No. R-2014-2428742

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

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

PENNSYLVANIA PUBLIC  
UTILITY COMMISSION,

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Docket No. R-2014-2428742

v.

WEST PENN POWER COMPANY

**CERTIFICATE OF SERVICE**

I, Heather M. Langeland, do hereby certify that a true and accurate copy of the foregoing document was served on all parties of record this 3rd day of October, 2014 by depositing a copy of the same in the United States mail, postage prepaid and addressed to:

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Heather M. Langeland

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

PENNSYLVANIA PUBLIC  
UTILITY COMMISSION,

v.

WEST PENN POWER COMPANY

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Docket No. R-2014-2428742

**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 West Penn Power Company (“West Penn”) 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](http://www.edf.org)). EDF has 14, 775 members living in Pennsylvania, and 328,490 members nationwide. EDF has members living in West Penn’s service territory that would be impacted by West Penn’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 West Penn's service territory that would be impacted by West Penn'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](mailto:mpanfil@edf.org)

Heather M. Langeland  
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4. On or about August 4, 2014, West Penn, 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 West Penn would increase rates across its service territory. Petitioners, on behalf of their members and the public interest, have an interest in ensuring that the West Penn 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 West Penn'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:

Michael Panfil  
John Finnigan  
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1875 Connecticut Ave., N.W.  
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Phone: (202) 572-3280  
Fax: (202) 234-6049  
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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,



Michael Panfil

John Finnigan

EDF

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Washington, DC 20009

Phone: (202) 572-3280

Fax: (202) 234-6049

[mpanfil@edf.org](mailto:mpanfil@edf.org)

Counsel for Petitioner EDF



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[langeland@pennfuture.org](mailto:langeland@pennfuture.org)

Counsel for Petitioner PennFuture

DATED: October 3, 2014