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October 14, 2014

Via Electronic Filing

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

**Re: Pennsylvania Public Utility Commission v. West Penn Power Company,
Pennsylvania Electric Company, Pennsylvania Power Company, Metropolitan
Edison Company
Docket Nos. R-2014-2428742, R-2014-2428743, R-2014-2428744, R-2014-2428745,
M-2013-2341991, M-2013-2341994, M-2013-2341993, M-2013-2341990**

Dear Secretary Chiavetta:

On behalf of Wal-Mart Stores East, LP and Sam's East, Inc. (collectively, "Walmart"), please find enclosed for filing with the Pennsylvania Public Utility Commission ("PaPUC" or "Commission") the Petition to Intervene of Wal-Mart Stores East, LP and Sam's East, Inc. in the above-captioned matters.

This document was filed electronically with the Commission on this date. All parties are being served a copy of this document in accordance with the enclosed Certificate of Service.

Please contact me if you have any questions concerning this filing.

Very truly yours,

STEVENS & LEE



Donald R. Wagner

Enclosure

cc: Administrative Law Judge Dennis J. Buckley (via Email and First Class Mail)
Certificate of Service

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**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission	:	Docket Nos.
v.	:	
West Penn Power Company	:	R-2014-2428742; M-2013-2341991
Pennsylvania Electric Company	:	R-2014-2428743; M-2013-2341994
Pennsylvania Power Company	:	R-2014-2428744; M-2013-2341993
Metropolitan Edison Company	:	R-2014-2428745; M-2013-2341990

**PETITION TO INTERVENE OF
WAL-MART STORES EAST, LP AND SAM'S EAST, INC.**

Pursuant to 52 Pa. Code Sections 5.71 through 5.74, Wal-Mart Stores East, LP and Sam's East, Inc. (collectively, "Walmart" or "Petitioner"), hereby respectfully files this Petition to Intervene in the above-captioned proceedings. In support thereof, Walmart states as follows:

1. On August 4, 2014, Metropolitan Edison Company ("Met-Ed"), Pennsylvania Electric Company ("Penelec"), Pennsylvania Power Company ("Penn Power"), and West Penn Power Company ("West Penn") (collectively, the "FirstEnergy Companies") each filed with the Pennsylvania Public Utility Commission ("PaPUC" or "Commission") a Distribution Base Rate Filing pursuant to Section 1308(d) of the Public Utility Code, 66 Pa.C.S. § 1308(d).

2. By Order entered October 2, 2014, the Commission acted to allow the tariff filings to be suspended by operated of law and instituted an investigation into the lawfulness, justness and reasonableness of FirstEnergy Companies' existing and proposed rates, rules and regulations.

3. The Commission's regulations at 52 Pa. Code § 5.72(a) provide that "A petition to intervene may be filed by a person claiming a right to intervene or an interest of such nature that intervention is necessary or appropriate to the administration of the statute under which the proceeding is brought. The right or interest may be one of the following:

- (a) A right conferred by statute of the United States or of the Commonwealth;
- (b) An interest which may be directly affected and which is not adequately represented by existing participants, and as to which the petitioner may be bound by the action of the Commission in the proceeding; or
- (c) Another interest of such nature that participation of the petitioner may be in the public interest.”

4. Walmart is a national retailer with 156 facilities in the Commonwealth of Pennsylvania. Approximately 90 stores and related facilities are in the FirstEnergy Companies’ service territories. These facilities include Walmart stores, Sam’s Clubs, distribution centers, and gas stations. Walmart is a large commercial customer of the FirstEnergy Companies, taking delivery of millions of kWh annually from the FirstEnergy Companies. The cost of electricity is one of the highest single components of Walmart’s cost of operating its commercial business in the FirstEnergy Companies’ service territory. The matters to be decided by the Commission in this case may have a direct and substantial impact on the rates Walmart pays for electricity.

5. Walmart anticipates addressing issues related to, but not limited to, cost of equity, revenue requirement, cost of service, revenue allocation, and rate design. Walmart will cooperate with the Presiding Administrative Law Judge (“ALJ”) and the parties regarding the procedural schedule, discovery rules and any directive issued by the ALJ in accordance with the Commission’s regulations. Walmart has a direct and substantial interest in this proceeding and no other entity can represent Walmart’s interests. Walmart expects to sponsor testimony and its proposed witness will be:

Steve W. Chriss
Senior Manager, Energy Regulatory Analysis
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6. For purposes of service in the above-captioned proceedings, please direct all communications to:

Donald R. Wagner, Esq (Attorney ID No. 80280)
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7. Petitioner respectfully requests the parties provide an electronic copy of communications to Walmart, in care of:

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Phone: (479) 204-1594
Fax: (479) 899-5877
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WHEREFORE, Walmart respectfully requests that its Petition to Intervene be granted and that it be accorded full party status in the above-captioned proceedings.

Respectfully submitted,

STEVENS & LEE



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Attorneys for Wal-Mart Stores East, LP and Sam's East, Inc.

Dated: October 14, 2014

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission	:	Docket Nos.
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Pennsylvania Power Company	:	R-2014-2428744; M-2013-2341993
Metropolitan Edison Company	:	R-2014-2428745; M-2013-2341990

CERTIFICATE OF SERVICE

I hereby certify that I served a true and correct copy of the Petition to Intervene on behalf of Wal-Mart Stores East, LP and Sam’s East, Inc. (collectively, “Walmart”), on the following persons in the matter specified in accordance with the requirements of 52 Pa. Code § 1.54:

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*Attorneys for Wal-Mart Stores East, LP and Sam's
East, Inc.*

Dated: October 14, 2014