

September 1, 2015

VIA ELECTRONIC FILING  
Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street, 2<sup>nd</sup> Floor – 1 North  
Harrisburg, PA 17120

**Re: West Penn Power Company Supplement No. 5 to Tariff Electric Pa. P.U.C. No. 40,  
Docket No. R-2012-2428742 – Response to 52 Pa. Code § 53.52(a)**

Dear Secretary Chiavetta:

Transmitted herewith for filing with the Pennsylvania Public Utility Commission (“Commission”) are exhibits to support West Penn Power Company’s (“West Penn” or the “Company”) filing of Tariff Electric Pa. P.U.C. No 40, Supplement 5 which bears an issue date of August 7, 2015 and is proposed to be effective October 6, 2015 (“Supplement”). Specifically, the exhibits required to support the Supplement and which are enclosed herein include those in response to Section 53.52 (a) of the Commission’s regulations.

Copies have been served on all parties as indicated in the attached certificate of service. If you have any questions regarding the enclosed documents, please feel free to contact me.

Sincerely,



Charles V. Fullem  
Director – Rates and Regulatory Affairs-PA

Enclosures  
cc: per Certificate of Service

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**WEST PENN POWER COMPANY** : **Docket Nos. R-2014-2428742**  
v. :  
: :  
**PENNSYLVANIA PUBLIC UTILITY** : :  
**COMMISSION** : :

**Request for Approval of a General Base  
Rate Case**

**CERTIFICATE OF SERVICE**

I hereby certify and affirm that I have this day served copies of Supplement No. 5 to **West Penn Power Company** Tariff No. 40, response to 52 Pa. Code § 53.52(a), upon the following persons in the matter specified in accordance with the requirement of 52 Pa. Code § 1.54:

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Dated: September 1, 2015

  
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WEST PENN POWER COMPANY

Outlined below are the responses of West Penn Power Company (“West Penn”) to those requirements of 52 Pa. Code § 53.52(a). Responses to subsections (b) through (d) of this section have not been provided as those subsections do not apply to the proposed tariff revisions as filed on August 7, 2015.

52 Pa. Code 53.52(a)

- (1) The specific reasons for each change.

West Penn Power Electric Pa. P.U.C. No. 40, Supplement 5 was filed on August 7, 2015 (“August 7 Supplement”) to revise the tariff originally issued on May 1, 2015 in compliance with the Pennsylvania Public Utility Commission’s (“Commission”) April 9, 2015 Opinion and Order at Docket No. R-2012-2428742 (“April 9 Order”). These revisions provide correction and clarification to the tariff as issued on May 1, 2015 in order to ensure its consistency with the terms and intent of the Joint Petition for Partial Settlement of Rate Investigation as filed on February 3, 2015 and approved by the Commission’s April 9 Order (“Settlement”). More detailed explanations of each individual revision can be found in the matrix accompanying the August 7 Supplement, and which has been resubmitted as Schedule A to this response.

- (2) The total number of Customers served by the utility.

As of March 2014, the end of the historical test year contemplated by the Settlement, West Penn Power served a total of 719,951 customers.

- (3) A calculation of the number of Customers, by tariff subdivision, whose bills could be affected by the change.

Any customer bill impacts that will result from these revisions are merely a result of corrections to misstated rates. No bill impacts are expected outside of those already contemplated under the Settlement.

- (4) The effect of the change on the utility’s customers.

Any effects to customers that will result from these revisions are merely a result of corrections and clarifications of previously agreed-upon terms. No customer impacts are expected outside of those already contemplated under the Settlement.

- (5) The direct or indirect effect of the proposed change on the utility’s revenue and expenses.

Any impacts to West Penn's revenues or expenses that will result from these revisions are merely a result of corrections to misstated rates. No revenue or expense are expected outside of those already contemplated under the Settlement.

- (6) The effect of the change on the service rendered by the utility

Any effects to service rendered that will result from these revisions are merely a result of corrections and clarifications of previously agreed-upon terms. No impacts to service rendered by West Penn are expected outside of those already contemplated under the Settlement.

- (7) A list of factors considered by the utility in its determination to make the change. The list shall include a comprehensive statement about why these factors were chosen and the relative importance of each. This subsection does not apply to a portion of a tariff change seeking a general rate increase as defined in 66 Pa.C.S. § 1308 (relating to voluntary changes in rates).

West Penn elected to file these revisions in order to make certain corrections and clarifications to ensure that West Penn Power Electric Pa. P.U.C. No. 40 would be consistent and in compliance with the terms and intent of the Settlement as approved by the Commission.

- (8) Studies undertaken by the utility in order to draft its proposed change. This paragraph does not apply to a portion of a tariff change seeking a general rate increase as defined in 66 Pa.C.S. § 1308.

No studies were required; the revisions only make certain corrections and clarifications to ensure that West Penn Power Electric Pa. P.U.C. No. 40 would be consistent and in compliance with the terms and intent of the Settlement as approved by the Commission.

- (9) Customer polls taken and other documents which indicate customer acceptance and desire for the proposed change. If the poll or other documents reveal discernible public opposition, an explanation of why the change is in the public interest shall be provided.

No polls were taken; the revisions only make certain corrections and clarifications to ensure that West Penn Power Electric Pa. P.U.C. No. 40 would be consistent and in compliance with the terms and intent of the Settlement as approved by the Commission.

- (10) Plans the utility has for introducing or implementing the changes with respect to its ratepayers.

West Penn communicated the impact of the Settlements to customers as relevant at the time its current tariff became effective. Because the revisions only make certain corrections and clarifications to ensure that West Penn Power Electric Pa. P.U.C. No. 40 would be consistent and in compliance with the terms and intent of the Settlement as approved by the Commission, no additional introduction or implementation is required.

(11) FCC, FERC or Commission orders or rulings applicable to the filing.

The following orders or rulings are applicable to the filing:

- West Penn Rate Case order dated April 9, 2015 at Docket No. R-2014-2428742.

West Penn Power Tariff Revisions									
Revision #	Tariff Page	Topic	Current Text	Error/Change	Revised Text	Source/Comments			
1	4	Table of Contents	21. Service Continuity: Limitation of Liability... Rider H – Price to Compare Default Service Rider	Change "of" to "on".	21. Service Continuity: Limitation on Liability... Rider H – Price to Compare Default Service Rate Rider	Formatting/Grammar			
2	6	Table of Contents	Rider L – Partial Service Rider	Add "Rate" to title of Rider.	Rider L – Partial Services Rider	Formatting/Grammar			
3	6	Table of Contents	If the demand so determined under this provision exceeds twenty-five (25) kilowatts, a monthly distribution demand charge of Two Dollars (\$2.00) per kW for all kW shall apply to such excess as set forth in this Provision A, in addition to the General Monthly Charges.	Add "s" to Service.	Rider L – Partial Services Rider	Formatting/Grammar			
4	65	Rate Schedule 10 - Loads in Excess of 25 KW	If the demand so determined under this provision exceeds twenty-five (25) kilowatts, a monthly distribution demand charge of Two Dollars (\$2.00) per kW for all kW shall apply to such excess as set forth in this Provision A, in addition to the General Monthly Charges.	Remove "A" after provision, no longer applies as there is no provision A.	If the demand so determined under this provision exceeds twenty-five (25) kilowatts, a monthly distribution demand charge of Two Dollars (\$2.00) per kW for all kW shall apply to such excess as set forth in this provision, in addition to the General Monthly Charges.	Formatting/Grammar			
5	69	30 - Availability	If an existing Customer's total consumption is less than 1,500 KWH per month for twelve (12) consecutive months, the Customer may no longer be eligible for service under this Rate Schedule 30.	Remove "twelve (12)" and insert "two (2)".	If an existing Customer's total consumption is less than 1,500 KWH per month for two (2) consecutive months, the Customer may no longer be eligible for service under this Rate Schedule GS-Medium.	Two consecutive months consistent with K.Siedt testimony, Statement 4, page 15, line 11.			
6	69	30 - Availability	If an existing Customer's billing demand exceeds 400 kw for more than two (2) consecutive months in any 12-month period, then the Customer may no longer be eligible for service under this Rate Schedule 30 and shall be placed on Rate Schedule 35 or such other Rate Schedule for which such Customer most qualifies.	Remove "more than" and "in any 12-month period".	If an existing Customer's billing demand exceeds 400 kw for two (2) consecutive months, then the Customer may no longer be eligible for service under this Rate Schedule GS-Medium, and shall be placed on Rate Schedule GS-Large or such other Rate Schedule for which such Customer most qualifies.	Source: K.Siedt testimony, Statement 4, page 15, line 11.			
7	70	30 - Default Service Charges	For Customers receiving Default Service from the Company, Rider I - Hourly Pricing Default Service Rider rates apply.	Add Rider H and clarify Rider I is voluntary.	For Customers receiving Default Service from the Company, Rider H-Price to Compare Default Service Rate Rider, Commercial Customer Class rate applies unless the Customer elects to receive Default Service from the Company under Rider I-Hourly Pricing Default Service Rider.	Clarifying voluntary availability/applicability to elect Hourly Pricing			
8	70,74	30 and 35 - kwh/200		Add language to calculate demand using a formula if customer does not have a demand meter.	Pending the installation of a demand meter, Customer's Demand shall be a formula demand determined by dividing the kilowatt-hour consumption by 200.	Source: K.Siedt testimony, Statement 4, page 15, line 11. Previously in wp Schedule 20 old tariff.			

West Penn Power Tariff Revisions					
Revision #	Tariff Page	Topic	Current Text	Error/Change	
9	70, 74, 77	Rate Schedules 30, 35 and 40 - Billing Demand	A Customer's demand shall be measured by indicating or recording instruments. Demands shall be integrated over 15-minute intervals. The billing demand in the current month shall be the greatest of: (i) the maximum measured demand established in the month during On-peak hours, as stated herein, (ii) forty percent (40%) of the maximum measured demand established in the month during Off-peak hours, (iii) contract demand or (iv) fifty percent (50%) of the highest billing demand established during the preceding eleven (11) months.	Capitalize On-Peak Hours and off-peak hours appropriately. Add Metering requirement (last sentence) for effectiveness to On Peak demand calculation.	
10	70	Rate Schedule 30 - Default Service Charges	For Customers receiving Default Service from the Company, Rider H - Hourly Pricing Rider Rates apply.	Change Rider I applicability to Rider H	
11	71 and 75	30 and 35		Add language on facilities charge to Schedule 30 and 35.	
12	72	Rate Schedule 30 - Service At Primary Voltage	Customers serviced at Primary Voltage shall have the option to be billed under this Rate Schedule 30 for any of the following conditions:	Language revised based on changes to the referenced conditions.	
					Revised Text
					A Customer's demand shall be measured by indicating or recording instruments. Demands shall be integrated over 15-minute intervals. The billing demand in the current month shall be the greatest of: (i) the maximum measured demand established in the month during On-Peak Hours, as stated herein, (ii) forty percent (40%) of the maximum measured demand established in the month during off-peak hours, (iii) contract demand or (iv) fifty percent (50%) of the highest billing demand established during the preceding eleven (11) months.
					The on-peak and off-peak hour provisions of this definition are only applicable for those customers who have installations of non-interval Time-of-Use demand meters.
					For Customers receiving Default Service from the Company, Rider H - Price To Compare Default Service Rate Rider, Commercial Customer Class rate apply.
					GENERAL When Company installs local transformer capacity to supply a highly fluctuating load, a facility charge of 2.1% net per month of the cost of additional transformer capacity required by the highly fluctuating load shall be made.
					Facilities charge was in Rate Schedule 20 and 30 in the previous WP tariff and was inadvertently left out in the new tariff. Language was also added to Rate Schedule 35.
					Correction of availability/applicability, see also # 5
					Source/Comments
					Metering limitation
					Formatting/Grammar

West Penn Power Tariff Revisions						
Revision #	Tariff Page	Topic	Current Text	Error/Change	Revised Text	Source/Comments
13	72	Rate Schedule 30 - Service At Primary Voltage	1. A Customer with an estimated maximum demand of 2,000 kW or less, and requiring Primary Service at a voltage less than the nearest available Primary Voltage. 2. Customer's maximum billing demand does not exceed 2,000 kW for more than two (2) consecutive months in any 12-month period and service is supplied through a Customer-owned transformer at the nearest available Primary Voltage.	Remove language.		Not Applicable
14	72	Rate Schedule 30 - Service At Primary Voltage	Customer's maximum billing demand does not exceed 400 kW for two (2) consecutive months and service is supplied through a Customer-owned transformer at the available Primary Voltage.	Change 2,000 kW to 400 kW; remove "more than"; and remove "in any 12-month period".	...Customer's maximum billing demand does not exceed 400 kW for two (2) consecutive months and service is supplied through a Customer-owned transformer at the available Primary Voltage.	Correction for the proper demand level
15	73	Rate Schedule 35 - Availability	Available for secondary light and power service for loads over 400 kW.	Remove "secondary".	Available for light and power service for loads over 400 kW.	Removing availability limitation
16	73	Rate Schedule 35 - Energy	0.000 cents per kWh for all kWh	Remove language.		Energy charge is not applicable
17	75	Rate Schedule 35 - Service at Primary Voltage		Add language.	Customers serviced at Primary Voltage shall have the option to be billed under this Rate Schedule 35 if the Customer's maximum billing demand does not exceed 2000 kW for two (2) consecutive months and service is supplied through a Customer-owned transformer at the available Primary Voltage.	Inadvertently left out of the Settlement tariff filing
18	75	Rate Schedule 35 - Term	TERM Minimum of one year, except as provided below under Monthly Service.	Remove ", except as provided below under Monthly Service."	TERM Minimum of one year.	Not Applicable
19	75 and 78	Rate Schedules 35, 40 Voltage Discounts	Block structure	Rates are the same so eliminate blocking structure.		Formatting/Grammar
20	76	Rate Schedule 40 - rkva charge		Move rkva charge above Transformer Charge heading.		Formatting/Grammar, currently reads as if the rkva charge is part of the Transformer Charge
21	78	Rate Schedule 40 - Voltage Discount	kW.....\$0. 43	Add "per kW for all billed kW".	kW .....\$0 .43 per kW for all billed kW	Clarification of charge
22	84	Rate Schedule 46 - Riders		Add Rider G, Smart Meter, to applicable riders for Rate 46.		Adding missing rider

West Penn Power Tariff Revisions			
Revision #	Tariff Page	Topic	Revision #
23	87	Schedule 51 Street Lighting Service	
			Source/Comments Removing inapplicable rider
24	95	Schedule 53 Street Lighting Service	
			Revised Text 50,000 Lumen -400 Watts167 kWh...\$20.62
25	163	Rider F Phase II EEC	
			Correcting cut/paste error in rate. WPP Settlement Exhibit 4 page 22 of 34, line 7
26	175	Rider H, Loss Factors	
			Removing nonexistent rate
27	177	Rider H, PTC Rider	
			Non-profit Customer Class (Rate GS 20 - Volunteer Fire Company, and Non-Profit Ambulance Service, Rescue Squad and Senior Center Service Rate): MS); Customer Class Loss Factor Commercial Customer Class 1.0515 Residential Customer Class 1.0515
28	192	Rider K Time of Use Rider	
			Customer Class Loss Factor Commercial Customer Class 1.0910 Residential Customer Class 1.0899
29	192	Rider K Time of Use Rider	
			Correct to match supplier tariff & current factors. WPP Tariff 39 Page No. 37-2
			Formatting/Grammar
			Remove bullet text, duplicative.
			Eliminate "following approval of that plan by the Commission".
			(1) have had smart meters installed pursuant to the West Penn Power Smart Meter Technology Procurement and Installation Plan following approval of that plan by the Commission;
			TOU Default On-Peak = Residential Customer Class PTC Default Rate X 1.28
			TOU Default On-Peak = Residential Customer Class PTC Default Rate X 1.35
			Correction for incorrect cut/paste. WPP Tariff 39 Page 42

West Penn Power Tariff Revisions							
Revision #	Tariff Page	Topic	Current Text	Error/Change	Revised Text	Source/Comments	
30	193	Rider K Time of Use Rider	The rates for TOU default service are different for On-Peak Hours and Off-Peak Hours during the months of June, July and August, and billed on a service rendered basis. The TOU default service rate for all other months will not reflect an On-Peak or Off-Peak differential. On-Peak hours are all hours beginning 12:00 PM (1200 hours) Eastern Standard Time and ending 9:00 PM (2100 hours) Eastern Standard Time each day from Monday through Friday. Off-Peak Hours are all hours not identified as On-Peak Hours.	Replace hours, Prevailing Time and remove Independence Day.	The rates for TOU default service are different for on-peak hours and off-peak hours during the months of June, July and August, and are billed on a service rendered basis. The TOU default service rate for all other months will not reflect an on-peak or off-peak differential. On-Peak Hours are all hours beginning 12:00 PM (1200 hours) Eastern Standard Time and ending 9:00 PM (2100 hours) Eastern Standard Time each day from Monday through Friday. Off-Peak Hours are all hours not identified as On-Peak Hours.	Metering limitation	
31	194	Rider K Time of Use Rider	<u>Commission's Failure to Approve an EGS Contract and Alternative Rates</u> In the event the Commission does not approve a standard contract for use between the Company and participating EGSs or no EGS elects to provide TOU default service, Customers enrolled, or electing to enroll, in the TOU default service program will receive service under the terms and conditions of the Company's Price To Compare Default Service Rate Rider, and the TOU Default rates shall be the rates set forth in such Price to Compare Default Service Rate Rider (including, without limitation, "E" Factor of such rates). During the Summer Period, the PTCDefault rate will be multiplied by 1.28 to establish the TOU Default On-Peak rate during on-peak hours and multiplied by 0.82 to establish the TOU Default Off-Peak rate during off-peak hours.	Remove duplicative comma after enroll; change on peak and off peak to lower case.	<u>Commission's Failure to Approve an EGS Contract and Alternative Rates</u> In the event the Commission does not approve a standard contract for use between the Company and participating EGSs or no EGS elects to provide TOU default service, Customers enrolled, or electing to enroll, in the TOU default service program will receive service under the terms and conditions of the Company's Price To Compare Default Service Rate Rider, and the TOU Default rates shall be the rates set forth in such Price to Compare Default Service Rate Rider (including, without limitation, "E" Factor of such rates). During the Summer Period, the PTCDefault rate will be multiplied by 1.28 to establish the TOU Default On-Peak rate during on-peak hours and multiplied by 0.82 to establish the TOU Default Off-Peak rate during off-peak hours.	Formatting/Grammar	
32	195	Rider L	Backup Demand Primary Voltage \$0.27	Replace \$0.27	Backup Demand Primary Voltage \$0.41	Correction for incorrect cut/paste. WPP Settlement Exhibit 4, Page 33 of 34, line 4	

