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March 9, 2016

Via Electronic Filing

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

Re: Petition of West Penn Power Company for Approval to Establish and Implement
a Distribution System Improvement Charge; Docket No. P-2015-2508948;
**PETITION TO INTERVENE OF THE PENNSYLVANIA STATE
UNIVERSITY**

Dear Secretary Chiavetta:

Please find enclosed for filing with the Pennsylvania Public Utility Commission the
Petition to Intervene of The Pennsylvania State University in the above-captioned docket.
Copies have been served in accordance with the attached Certificate of Service.

Should you have any questions or comments, please feel free to contact me directly.

Very truly yours,

Thomas J. Sniscak
Christopher M. Arfaa
William E. Lehman

*Counsel for
The Pennsylvania State University*

TJS/WEL/das

Enclosures

cc: Per Certificate of Service

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of West Penn Power Company for :
Approval to Establish and Implement a : Docket No. P-2015-2508948
Distribution System Improvement Charge :

**PETITION TO INTERVENE OF
THE PENNSYLVANIA STATE UNIVERSITY**

NOW COMES The Pennsylvania State University (“PSU”), by and through its attorneys, Hawke McKeon & Sniscak LLP, and files this Petition to Intervene in the above-captioned proceeding before the Pennsylvania Public Utility Commission (“Commission”). In support of its Petition, PSU avers as follows:

1. On or about February 16, 2016, West Penn Power Company (“West Penn” or the “Company”), filed with the Commission a Petition seeking to establish and implement a distribution system improvement charge (DSIC”) to recover, outside of a base rate case, a return on and a return of capitalized costs related to eligible property constructed or installed to rehabilitate, improve and replace portions of its electric distribution system.

2. All correspondence and pleadings in this docket should be directed to PSU's counsel in this matter:

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3. Eligibility to intervene in Commission proceedings is governed by the Commission's regulations found at 52 Pa. Code § 5.72. The Commission's regulations provide that in order to have the ability to intervene, a party must have "a right or interest" sufficient to warrant intervention, which includes an interest that may be directly affected by the proceeding and which is not being adequately represented by existing participants, and where the petitioner may be bound by the actions of the Commission or where the right or interest is otherwise in the public interest. *Id.*

4. PSU has such an interest. PSU is a major customer of West Penn at its University Park campus, receiving service through West Penn's Tariff 38. PSU is the only customer taking service under Tariff 38. PSU also receives generation, transmission and distribution service from West Penn under rate schedules other than Tariff 38 for approximately 100 additional accounts at the University Park campus including the airport and campuses at New Kensington, Fayette and Mont Alto.

5. As a large customer, PSU will be substantially and directly affected by any decision, final order, or settlement in this matter and will be bound thereby. PSU is continuing to review the filing to determine if it is reasonable, appropriate and consistent with statutory requirements and regulatory principles. Moreover, PSU has an interest in any changes or modifications to the filing that may be proposed by parties other than West Penn.

6. For the reasons stated above, PSU's intervention in this matter meets the intervention standards of 52 Pa. Code § 5.72, and is otherwise in the public interest. Accordingly, PSU requests that this intervention be granted and that it be allowed full party status in this matter.

WHEREFORE, The Pennsylvania State University respectfully requests that the Pennsylvania Public Utility Commission grant it party status in the above-captioned matter.

Thomas J. Sniscak

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*Counsel for
The Pennsylvania State University*

Dated: March 9, 2016

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the foregoing document upon the parties, listed below, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a party).

VIA FIRST CLASS U.S. MAIL

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Dated this 9th day of March, 2016