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VIA ELECTRONIC FILING

April 1, 2016

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17105-3265

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

Dear Secretary Chiavetta:

Please find enclosed the PETITION TO INTERVENE OF AK STEEL CORPORATION for filing in the above-captioned proceeding.

By copy of this letter, all parties listed on the Certificate of Service have been served.

Respectfully submitted,



David F. Boehm, Esq. (PA Attorney I.D. # 72752)
BOEHM, KURTZ & LOWRY

COUNSEL FOR AK STEEL CORPORATION

DFBkew
Enclosure

cc: Certificate of Service
ALJ Charles E. Rainey, Jr. – crainey@pa.gov
Pa. Public Utility Commission
P.O. Box 3265
Harrisburg, PA 17105

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**Petition Of West Penn Power Company for approval to establish : Docket No. P-2015-2508948
and implement a distribution system improvement charge :**

**PETITION TO INTERVENE OF
AK STEEL CORPORATION**

AK Steel Corporation (“AK Steel”), by its counsel hereby files the instant Petition to Intervene in response to the Petition of West Penn Power Company (“West Penn”) pursuant to Sections 5.71 through 5.74 of the Regulations of the Pennsylvania Public Utility Commission, 52 Pa. Code § § 5.71 – 5.74.

On October 19, 2015, West Penn began the first step in implementing a Distribution System Improvement Charge (“DSIC”) to recover the reasonable and prudent costs incurred in repairing, improving or replacing distribution system property by filing a Long Term Infrastructure Improvement Plan (“LTIIIP”) proposed to upgrade its distribution system with an investment of \$88.34 million.

On February 11, 2016, the Commission approved West Penn’s LTIIIP.

Therefore, on February 16, 2016 West Penn filed the instant Petition requesting approval of a DSIC that would become effective on July 1, 2016.

AK Steel herewith submits its Petition to Intervene.

PETITION TO INTERVENE

1. AK Steel is a manufacturer of steel and steel products with a steel manufacturing plant located in Butler, Pennsylvania (“Butler Works”) which receives electric service from West Penn primarily under Rate Schedule 46. The Butler Works is the largest single customer of West Penn.

2. The name and address of AK Steel's attorneys are:

David F. Boehm, Esq.
Michael L. Kurtz, Esq.
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3. Although West Penn does not propose to apply the DSIC charge to Rate Schedule 46 and other named Exempt Classes, West Penn's proposed allocation may be subject to challenges and proposed revisions that could result in Rate 46 being wrongly assessed the proposed DSIC.

Therefore, as required by 52 Pa. Code 5.72(a), AK Steel has a significant interest in this proceeding that is not represented by any other party of record and should be granted full-party status in this proceeding.

Respectfully submitted,



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**ATTORNEYS FOR AK STEEL
CORPORATION**

April 1, 2016

A F F I D A V I T

STATE OF OHIO)
)
COUNTY OF HAMILTON) SS:

I, DAVID F. BOEHM, being duly sworn and according to law, deposes and says that he is Counsel for of AK Steel Corporation, and, that in this capacity, he is authorized to and does make this Affidavit for them, and that the facts set forth in the foregoing document are true and correct to the best of his knowledge, information and belief.



DAVID F. BOEHM, ESQ.

SWORN to me and subscribed before me, a notary public and for the State of Ohio this 1 day of April, 2016.



Notary Public



Kimberly Walton
Notary Public, State of Ohio
My Commission Expires 08-28-2019

CERTIFICATE OF SERVICE

I hereby certify that on this 1st day of April, 2016 I served a true copy of the PETITION TO INTERVENE OF AK STEEL CORPORATION on the following persons in the matter specified in accordance with the requirements of 52 Pa. Code §1.54.



David F. Boehm, Esq. (PA Attorney I.D. # 72752)
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VIA ELECTRONIC MAIL (when available) AND FIRST CLASS MAIL

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