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May 9, 2016

VIA eFILING

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

Re: Petition of Pennsylvania Power Company for Approval To Establish and Implement A Distribution System Improvement Charge
Docket No. P-2015-2508931

Dear Secretary Chiavetta:

Enclosed for filing is the **Answer of Pennsylvania Power Company to the Motion for Leave to Amend the Answer of the Penn Power Users Group** (the "Answer") in the above-captioned matter.

As evidenced by the enclosed Certificate of Service, copies of the Answer have been served on all parties to this proceeding.

Very truly yours,



Anthony C. DeCusatis

ACD/tp
Enclosures

c: Per Certificate of Service (w/encls.)

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Penn Power's answers to the numbered paragraphs of PPUG's Motion are set forth below.

1. Admitted.

2. Admitted.

3. Admitted.

4. The principal averments of Paragraph No. 4 constitute a prayer for relief to which an answer is not required.

5. The principal averments of Paragraph No. 5 consist of legal argument, citations to law or regulations that speak for themselves and/or requests for relief to which an answer is not required.

6. The principal averments of Paragraph No. 6 consist of legal argument, citations to law or regulations that speak for themselves and/or requests for relief to which an answer is not required.

7. The principal averments of Paragraph No. 7 consist of legal argument, citations to law or regulations that speak for themselves and/or requests for relief to which an answer is not required. It is admitted that this case has not been assigned to the Office of Administrative Law Judge and no hearing has been scheduled.

8. The principal averments of Paragraph No. 8 consist of legal argument, citations to law or regulations that speak for themselves and/or requests for relief to which an answer is not required.

9. The principal averments of Paragraph No. 9 consist of legal argument, citations to law or regulations that speak for themselves and/or requests for relief to which an answer is not required.

10. The principal averments of Paragraph No. 10 consist of legal argument, citations to law or regulations that speak for themselves and/or requests for relief to which an answer is not required.

11. The principal averments of Paragraph No. 11 consist of legal argument, citations to law or regulations that speak for themselves and/or requests for relief to which an answer is not required.

12. It is denied that the amendments proposed by PPUG constitute “probative facts” that “are necessary for the Commission to resolve the Company’s Petition.” It is admitted that PPUG is proposing to amend its Answer “at an early stage of the proceeding.” The Company does not assert that the proposed amendment would prejudice it at this stage of the proceeding.

13. The principal averments of Paragraph No. 13 consist of legal argument, citations to law or regulations that speak for themselves and/or requests for relief to which an answer is not required.

14. Paragraph No. 14 is a prayer for relief to which an answer is not required.

WHEREFORE, Penn Power would not oppose PPUG’s Motion to Amend its Answer on the condition that, if the Motion is granted and the Commission accepts PPUG’s Answer, Penn

Power will have the right, pursuant to 52 Pa. Code §§ 5.62 and 5.63, to file a Reply to the additional New Matter set forth in the Amended Answer if Penn Power determines that such a Reply might be needed.

Respectfully submitted,



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Dated: May 9, 2016

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**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**PETITION OF METROPOLITAN
EDISON COMPANY FOR APPROVAL
TO ESTABLISH AND IMPLEMENT A
DISTRIBUTION SYSTEM
IMPROVEMENT CHARGE** : **Docket No. P-2015-2508942**
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**PETITION OF PENNSYLVANIA
ELECTRIC COMPANY FOR
APPROVAL TO ESTABLISH AND
IMPLEMENT A DISTRIBUTION
SYSTEM IMPROVEMENT CHARGE** : **Docket No. P-2015-2508936**
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**PETITION OF PENNSYLVANIA
POWER COMPANY FOR APPROVAL
TO ESTABLISH AND IMPLEMENT A
DISTRIBUTION SYSTEM
IMPROVEMENT CHARGE** : **Docket No. P-2015-2508931**
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**PETITION OF WEST PENN POWER
COMPANY FOR APPROVAL TO
ESTABLISH AND IMPLEMENT A
DISTRIBUTION SYSTEM
IMPROVEMENT CHARGE** : **Docket No. P-2015-2508948**
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CERTIFICATE OF SERVICE

I hereby certify and affirm that I have this day served a copies of the **Answers of Metropolitan Edison Company, Pennsylvania Electric Company, Pennsylvania Power Company and West Penn Power Company** to the **Motions for Leave to Amend the Answers of the Met-Ed Industrial Users Group, the Penelec Industrial Customer Alliance, the Penn Power Users Group and the West Penn Power Industrial Intervenors** on the following persons in the manner specified in accordance with the requirements of 52 Pa. Code § 1.54:

VIA ELECTRONIC MAIL & FIRST CLASS MAIL

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Dated: May 9, 2016