May 24, 2018

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

Re: Pennsylvania Public Utility Commission v. PECO Energy Company;
Docket No. R-2018-3000164

Dear Secretary Chiavetta:

Please find enclosed for filing with the Pennsylvania Public Utility Commission ("PUC" or "Commission") the Petition to Intervene of ArcelorMittal USA LLC ("ArcelorMittal"), in the above-referenced 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.

Sincerely,

SPILMAN THOMAS & BATTLE, PLLC

By
Derrick Price Williamson
Barry A. Naum

BAN/sds
Enclosures
c: Deputy Chief Administrative Law Judge Christopher P. Pell (via E-mail and First-Class Mail)
   Administrative Law Judge F. Joseph Brady (via E-mail and First-Class Mail)
   Certificate of Service
BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Pennsylvania Public Utility Commission          : P ennsylvania Public Utility Commission
v.                                                  : Docket No. R-2018-3000164
PECO Energy Company                               :

CERTIFICATE OF SERVICE

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

VIA E-MAIL & FIRST-CLASS MAIL

Romulo L. Diaz, Jr., Esquire                      Carrie B. Wright, Esquire
Jack R. Garfinkle, Esquire                       Pennsylvania Public Utility Commission
W. Craig Williams, Esquire                       Bureau of Investigation and Enforcement
Michael S. Swerling, Esquire                     P.O. Box 3265
PECO Energy Company                              Harrisburg, PA 17105-3265
to 2301 Market Street                             cawright@pa.gov
P.O. Box 8699                                    
Philadelphia, PA 19101                           
romulo.diaz@exeloncorp.com                       
jack.garfinkle@exeloncorp.com                   
craig.williams@exeloncorp.com                   
michael.swerling@exeloncorp.com

Kenneth M. Kulak, Esquire                        Aron J. Beatty, Esquire
Anthony C. DeCusatis, Esquire                   Christy M. Appleby, Esquire
Catherine G. Vasudevan, Esquire                 Hayley E. Dunn, Esquire
Morgan, Lewis & Bockius LLP                     Office of Consumer Advocate
1701 Market Street                               555 Walnut Street
Philadelphia, PA 19103                           5th Floor, Forum Place
ken.kulak@morganlewis.com                        Harrisburg, PA 17101
anthony.decusatis@morganlewis.com                abeatty@paoca.org
catherine.vasudevan@morganlewis.com             cappleby@paoca.org
                                               hdunn@paoca.org

Elizabeth Rose Triscari, Esquire                 
Office of Small Business Advocate                Commerce Building, Suite 202
300 North Second Street                          Harrisburg, PA 17101
etriscari@pa.gov
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Patrick M. Cicero, Esquire
Kadeem Morris, Esquire
Elizabeth R. Marx, Esquire
Pennsylvania Utility Law Project
118 Locust Street
Harrisburg, PA 17101
pulp@palegalaid.net

Scott J. Rubin, Esquire
333 Oak Lane
Bloomsburg, PA 17815-2036
scott.j.rubin@gmail.com

Charles T. Joyce, Esquire
Spear Wilderman, P.C.
230 South Broad Street, Suite 1400
Philadelphia, PA 19102
tjoyce@spearwilderman.com

Joseph L. Vullo, Esquire
1460 Wyoming Avenue
Forty Fort, PA 18704
jlvullo@byrrlaw.com

Charis Mincavage, Esquire
Adeolu A. Bakare, Esquire
Alessandra L. Hylander, Esquire
McNees Wallace & Nurick LLC
100 Pine Street
P.O. Box 1166
Harrisburg, PA 17108-1166
cmincavage@mcneeslaw.com
abakare@mcneeslaw.com
ahylander@mcneeslaw.com

Joline R. Price, Esquire
Robert W. Ballenger, Esquire
Community Legal Services, Inc.
1424 Chestnut Street
Philadelphia, PA 19102
jprice@clsphila.org
rballenger@clsphila.org

Mark C. Hammond, Esquire
Land Air Water Legal Solutions, LLC
1000 Westlakes Drive, Suite 150
Berwyn, PA 19312
mhammond@landairwater.com

Donald R. Wagner, Esquire
Linda R. Evers, Esquire
Michael A. Gruin, Esquire
Stevens & Lee
111 N. Sixth Street
Reading, PA 19601
drw@stevenslee.com
lre@stevenslee.com
mag@stevenslee.com

Karen O. Moury, Esquire
Eckert Seamans Cherin & Mellott, LLC
213 Market Street, 8th Floor
Harrisburg, PA 17101
kmoury@eckertseamans.com

Deanne M. O'Dell, Esquire
Sarah C. Stoner, Esquire
Eckert Seamans Cherin & Mellott, LLC
213 Market Street, 8th Floor
Harrisburg, PA 17101
dodell@eckertseamans.com
sstoner@eckertseamans.com

David P. Zambito, Esquire
Jonathan Nase, Esquire
Cozen O'Connor
17 North Second Street, Suite 1410
Harrisburg, PA 17101
dzambito@cozen.com
jnase@cozen.com
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Roman Petyk, Esquire
The University of Pennsylvania
Office of General Counsel
2929 Walnut Street
FMC Tower, Suite 400
Philadelphia, PA 19104-5099
roman.petyk@ogc.upenn.edu

Dated: May 24, 2018

Mark Belland, Esquire
O'Brien, Belland & Bushinsky, LLC
500-506 North 6th Street
Philadelphia, PA 19123
mbelland@obblaw.com

Barry A. Naum
PETITION TO INTERVENE OF
ARCELORMITTAL USA LLC

TO THE HONORABLE PENNSYLVANIA PUBLIC UTILITY COMMISSION:

Pursuant to 52 Pa. Code Sections 5.71 through 5.74, ArcelorMittal USA LLC ("ArcelorMittal"), hereby file this Petition to Intervene in the above-captioned proceeding. In support thereof, ArcelorMittal states as follows:

1. Petitioner is ArcelorMittal, 1 South Dearborn, 19th Floor, Chicago, IL 60603.

2. The name and address of Petitioners' attorneys are:

   Derrick Price Williamson
   Barry A. Naum
   SPILMAN THOMAS & BATTLE, PLLC
   1100 Bent Creek Boulevard, Suite 101
   Mechanicsburg, PA 17050
   Phone: (717) 795-2740
   Fax: (717) 795-2743
   dwilliamson@spilmanlaw.com
   bnaum@spilmanlaw.com

3. On March 29, 2018, PECO Energy Company ("PECO" or "Company") filed with the Pennsylvania Public Utility Commission ("PUC" or "Commission") Company's Tariff Electric — Pa. P.U.C. No. 6 ("Filing"), representing a request for a general increase in the Company's electric distribution rates of approximately $82 million to be effective May 28, 2018. The effective
date of new rates was suspended until December 28, 2018, by Order of the Commission issued on April 19, 2018.

4. ArcelorMittal, is the world's leading integrated steel and mining company. ArcelorMittal has steel-making operations in 18 countries on four continents and employs over 197,000 people worldwide. ArcelorMittal has two steel production facilities within PECO's service territory, in Coatesville, Pennsylvania, and in Conshohocken, Pennsylvania. These two facilities have a steelmaking capacity of approximately 1.4 million tons and employ over 875 employees. In that regard, ArcelorMittal annually consumes in excess of 13.7 million MWH of electricity delivered by PECO, primarily pursuant to Rate Schedule HT, making ArcelorMittal one of the largest individual customers on the Company's system. Accordingly, the cost, reliability, and quality of electric service provided by PECO are issues of critical importance to ArcelorMittal.

5. ArcelorMittal is still in the process of evaluating whether it will sponsor testimony in this proceeding. In the event ArcelorMittal decides to sponsor testimony, ArcelorMittal will promptly inform the parties and the presiding Administrative Law Judges ("ALJs"). Regardless, if intervention is granted, ArcelorMittal reserves the right to participate in this proceeding and adduce evidence through the submission of discovery, cross-examination of other parties' witnesses, and the submission of briefs, exceptions, and reply exceptions, as necessary.

6. ArcelorMittal's Petition is timely filed within the time permitted by 52 Pa. Code §§ 5.53 and 5.74, and ArcelorMittal's intervention at this stage will not delay or cause prejudice to

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1 52 Pa. Code § 5.74(b) states "Petitions to intervene shall be filed: (1) No later than the date fixed for the filing of responsive pleadings in an order or notice with respect to the proceedings but not less than the notice and protest period established under §§ 5.14 and 5.53 (relating to applications requiring notice; and time of filing) absent good cause shown. (2) No later than the date fixed for filing protests as published in the Pennsylvania Bulletin except for good cause shown. (3) In accordance with § 5.53 if no deadline is set in an order or notice with respect to the proceedings." Additionally, 52 Pa. Code § 5.53 states "[a] protest shall be filed within the time specified in the published notice of the application. If no protest time is specified, the protest shall be filed within 60 days of publication of the notice." ArcelorMittal understands that PECO has notified its customers that the deadline for filing a Complaint in this proceeding is June 29, 2018.
any current party in this proceeding. ArcelorMittal will take the proceeding as it stands and accepts
the schedule and procedural rules as set forth in the Prehearing Order issued by the presiding ALJs
on May 10, 2018.

7. The resolution of PECO's proposed rate increase, including any changes to the
Company's proposal or current tariff that other parties might propose, may directly impact the
costs, terms, and conditions of the electric service that ArcelorMittal receives from the Company.
Given ArcelorMittal's unique status as a large consumer with two steel production facilities, and
the substantial economic and employment benefits that ArcelorMittal individually provides in the
PECO territory and the surrounding region of Pennsylvania, ArcelorMittal's specific interests are
not represented by any other party in this case and are of such a nature that ArcelorMittal's
participation is in the public interest. See 52 Pa. Code § 5.72(a)(2) & (3).
WHEREFORE, ArcelorMittal USA LLC requests that the Commission grant this Petition to Intervene and provide ArcelorMittal with full party status in this proceeding.

Respectfully submitted,

By

Derrick Price Williamson (Pa. I.D. No. 69274)
Barry A. Naum (Pa. I.D. No. 204869)
SPILMAN THOMAS & BATTLE, PLLC
1100 Bent Creek Boulevard, Suite 101
Mechanicsburg, PA 17050
Phone: (717) 795-2740
Fax: (717) 795-2743
dwilliamson@spilmanlaw.com
bnaum@spilmanlaw.com

Counsel to ArcelorMittal USA LLC

Dated: May 24, 2018
VERIFICATION

I, Barry A. Naum, Counsel to ArcelorMittal USA LLC, hereby state that the factors set forth in the foregoing Petition to Intervene are true and correct to the best of my knowledge, information, and belief. I understand that the statements made herein are made subject to 18 Pa.C.S. § 4904 (pertaining to unsworn falsification to authorities).

Date: May 24, 2018

Barry A. Naum