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June 22, 2018

VIA ELECTRONIC FILING

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

**Re: Investigation of North Heidelberg Sewer Company;
Docket No. I-2018-3001161**

Dear Secretary Chiavetta:

Pursuant to Section 52 Pa. Code §§ 5.72–5.74, enclosed for filing is the Petition to Intervene of Metropolitan Edison Company regarding the above-referenced proceeding.

Please contact me if you have any questions.

Very truly yours,



Tori L. Giesler

Enclosures

c: Certificate of Service

4. On February 9, 2018, the Commission issued an Order at Docket No. M-2018-2645983 initiating a proceeding directing the appointment of a receiver for NHYSC under 66 Pa.C.S. § 529 and directing that an investigation be undertaken to determine whether a capable utility should be ordered to acquire NHSC consistent with the Commission's authority under Section 529. This investigation was subsequently initiated at Docket No. I-2018-3001161 (the "Investigation").

5. On May 25, 2018, the Commission issued a Hearing Notice at Docket No. I-2018-3001161 setting an initial pre-hearing conference to be held on July 17, 2018.

6. On June 1, 2018, a Notice of Section 529 Acquisition Investigation was issued, directed to proximate service providers and municipalities, for purposes of notifying them of the proceeding and providing deadlines for the filing of petitions to intervene by interested parties. Specifically, the Notice called for petitions or responsive pleadings to be filed no later than June 22, 2018.

7. Met-Ed is a Commission-certificated public utility providing electric distribution service to customers in eastern and central Pennsylvania.

8. The Commission's regulation at 52 Pa. Code § 5.72 permits a petition to intervene to be filed by a "person claiming a right to intervene or an interest of such nature that intervention is necessary or appropriate to the administration of the statute under which the proceeding is brought." 52 Pa. Code § 5.72(a).

9. A party is eligible to intervene under this section where it can demonstrate "an interest which may be directly affected and which is not adequately represented by existing participants, and as to which the petitioner may be bound by the action of the Commission in the proceeding." 52 Pa. Code § 5.72(a)(2).

10. The Commonwealth Court held that intervention is proper where a party's interest in the proceeding is "substantial, immediate, and direct." *George v. Pa. Pub. Util. Comm'n*, 735 A.2d 1282, 1286 (Pa. Commw. Ct. 1999); *see also Re: Equitable Gas Co.*, 76 Pa. P.U.C. 23 (Opinion and Order dated Jan. 16, 1992).

11. While Met-Ed is not a proximate service provider or municipality, it nonetheless has a substantial, immediate, and direct interest in this proceeding which may not be adequately represented by other participants in this proceeding. Specifically, the review and disposition of the Investigation could impact Met-Ed's ability to recover NHSC's still-outstanding arrearage which was the subject of Docket No. P-2017-2594688, and which in part led to the establishment of the Investigation. No other party may adequately represent Met-Ed's interests in this proceeding as no other party is responsible for Met-Ed's billing and collections operations. Therefore, Met-Ed is uniquely impacted by the developments and outcome of this proceeding.

12. For these reasons, there are no other parties that can adequately represent the interests of the Company in this proceeding and, as such, Met-Ed's Petition to Intervene should be granted.

WHEREFORE, Metropolitan Edison Company respectfully requests that the Commission grant this Petition to Intervene.

Dated: June 22, 2018



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