

COMMONWEALTH OF PENNSYLVANIA



OFFICE OF CONSUMER ADVOCATE

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December 21, 2020

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

Re: Joint Petition for Consolidation of Proceedings
and Approval of the Phase IV Energy Efficiency and
Conservation Plan of Metropolitan Edison Company,
Pennsylvania Electric Company, Pennsylvania Power
Company, and West Penn Power Company
Docket Nos. M-2020-3020820
M-2020-3020821
M-2020-3020822
M-2020-3020823

Dear Secretary Chiavetta:

Attached for electronic filing please find the Office of Consumer Advocate's Notice of Intervention and Public Statement in the above-referenced proceedings.

Copies have been served per the attached Certificate of Service.

Respectfully submitted,

/s/ Christy M. Appleby
Christy M. Appleby
Assistant Consumer Advocate
PA Attorney I.D. # 85824
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Enclosures:

cc: Office of Administrative Law Judge (**email only**)
Office of Special Assistants (**email only**: ra-OSA@pa.gov)
Bureau of Technical Utility Services (**email only**)
Certificate of Service

*300978

CERTIFICATE OF SERVICE

Re: Joint Petition for Consolidation of Proceedings : Docket Nos. M-2020-3020820
and Approval of the Phase IV Energy Efficiency : M-2020-3020821
and Conservation Plan of Metropolitan Edison : M-2020-3020822
Company, Pennsylvania Electric Company, : M-2020-3020823
Pennsylvania Power Company, and West Penn :
Power Company :

I hereby certify that I have this day served a true copy of the following document, the Office of Consumer Advocate's Notice of Intervention and Public Statement, upon parties of record in this proceeding in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant), in the manner and upon the persons listed below:

Dated this 21st day of December 2020.

SERVICE BY E-MAIL ONLY

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Dated: December 21, 2020
*300980

Aron J. Beatty
Senior Assistant Consumer Advocate
PA Attorney I.D. # 86625
E-Mail: ABeatty@paoca.org

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Joint Petition for Consolidation of Proceedings and :
Approval of Energy Efficiency and :
Conservation Plans Phase III : Docket No. M-2020-3020823
Metropolitan Edison Company, Pennsylvania :
Electric Company, Pennsylvania :
Power Company and West Penn Power Company :

NOTICE OF INTERVENTION

Pursuant to 52 Pa. Code 5.71-5.74, the Office of Consumer Advocate hereby gives its Notice of Intervention in the above-captioned proceeding. A copy of all correspondence and notices, documents, orders or other communications with respect to the above-captioned proceeding should be addressed to the following:

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Respectfully submitted,

/s/ Christy M. Appleby
Christy M. Appleby
Assistant Consumer Advocate
PA. Attorney I.D. # 85824

DATE: December 21, 2020

PUBLIC STATEMENT OF THE OFFICE OF CONSUMER ADVOCATE
PURSUANT TO 71 P.S. SECTION 309-4(e)

Act 161 of the Pennsylvania General Assembly, 71 P.S. Section 309-2, as enacted July 9, 1976, authorizes the Consumer Advocate to represent the interests of consumers before the Pennsylvania Public Utility Commission (Commission). In accordance with Act 161, and for the following reasons, the Consumer Advocate determined to intervene and participate in the Joint Petition for Consolidation of Proceedings and Approval of Energy Efficiency and Conservation Plans (EE&C Plan) Phase IV of Metropolitan Edison Company, Pennsylvania Electric Company, Pennsylvania Power Company and West Penn Power Company (Joint Petition).

On November 30, 2020, West Penn Power Company (West Penn or Company) filed the Joint Petition, pursuant to Section 2806.1 of the Public Utility Code and pursuant to the Implementation Order entered by the Commission at Docket No. M-2020-3015228 on June 18, 2020. The five-year cost of the Company's EE&C Phase IV Plan is projected to be \$117,813,010. West Penn EE&C Plan at 21. The Company plans to reduce annual energy consumption by 504,951 MWh and reduce demand by 86 MW by May 31, 2026. West Penn EE&C Plan at 21. With respect to residential customers, WPP has proposed the following three residential customer energy efficiency programs: (1) Energy Efficient Products Program; (2) Energy Efficient Homes Program; and (3) the Low-Income Energy Efficiency Program. West Penn EE&C Plan at 35-36.

The Acting Consumer Advocate determined to intervene in this proceeding to protect the interests of West Penn's customers; to ensure that the proposed Plan and programs are in accordance with Act 129 and all other applicable statutes, regulations, and Commission Orders; and to ensure that any increase in rates resulting from the adoption of the proposed programs and any related expenses are just and reasonable.