



COMMONWEALTH OF PENNSYLVANIA

December 21, 2020

E-FILED

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:

Enclosed please find the Notice of Intervention, Public Statement, and Verification, on behalf of the Office of Small Business Advocate (“OSBA”), in the above-captioned proceedings.

Copies will be served on all known parties in these proceedings, as indicated on the attached Certificate of Service.

If you have any questions, please do not hesitate to contact me.

Sincerely,

/s/ Erin K. Fure

Erin K. Fure
Assistant Small Business Advocate
Attorney ID No. 312245

Enclosures

cc: Robert D. Knecht
Parties of Record

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Joint Petition for Consolidation of	:	
Proceedings and Approval of the Phase IV	:	
Energy Efficiency and Conservation Plan	:	Docket No. M-2020-3020820
of Metropolitan Edison Company,	:	M-2020-3020821
Pennsylvania Electric Company,	:	M-2020-3020822
Pennsylvania Power Company, and West	:	M-2020-3020823
Penn Power Company	:	
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**NOTICE OF INTERVENTION
OF THE OFFICE OF SMALL BUSINESS ADVOCATE**

The Office of Small Business Advocate (“OSBA”) files this Notice of Intervention with respect to the Joint Petition that was filed with the Pennsylvania Public Utility Commission (“PUC” or “Commission”) on November 30, 2020 by Metropolitan Edison Company (“Met-Ed”), Pennsylvania Electric Company (“Penelec”), Pennsylvania Power Company (“Penn Power”), and West Penn Power Company (“West Penn”) (collectively, “First Energy” or “Companies”), with respect to the request for consolidation of proceedings and approval of the Phase IV Energy Efficiency and Conservation Plan (“EE&C Plan”). In support of this Intervention, the OSBA avers as follows:

1. The OSBA is an agency of the Commonwealth of Pennsylvania authorized by the Small Business Advocate Act (Act 181 of 1988, 73 P.S. §§ 399.41 – 399.50) to represent the interest of small business customers as a party in proceedings before the Commission.
2. Intervention in this case is necessary to ensure that the interests of small business customers served by the Companies are adequately represented.
3. Representing the OSBA in this proceeding is:

Erin K. Fure
Office of Small Business Advocate
555 Walnut Street, 1st Floor
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(717) 783-2525
(717) 783-2831 (fax)
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Respectfully Submitted,

/s/ Erin K. Fure

Erin K. Fure
Assistant Small Business Advocate
Attorney ID No. 312245

For:
John R. Evans
Small Business Advocate

Office of Small Business Advocate
555 Walnut Street, 1st Floor
Harrisburg, PA 17101
(717) 783-2525
(717) 783-2831 (fax)

Dated: December 21, 2020

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Joint Petition for Consolidation of	:	
Proceedings and Approval of the Phase IV	:	
Energy Efficiency and Conservation Plan	:	Docket No. M-2020-3020820
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Pennsylvania Power Company, and West	:	M-2020-3020823
Penn Power Company	:	
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**PUBLIC STATEMENT OF THE
OFFICE OF SMALL BUSINESS ADVOCATE**

The Small Business Advocate is authorized and directed to represent the interest of small business consumers of utility services in Pennsylvania under the provisions of the Small Business Advocate Act, Act 181 of 1988, 73 P.S. §§ 399.41 - 399.50 (“Act”). The Act further provides that the Small Business Advocate is to issue publicly a written statement stating concisely the specific interest of small business consumers to be protected by his initiation of or intervention in any proceeding involving those interests before the Public Utility Commission or any other agency or court. This public statement relates to the filing today by the Small Business Advocate of an intervention regarding the Joint Petition of Metropolitan Edison Company (“Met-Ed”), Pennsylvania Electric Company (“Penelec”), Pennsylvania Power Company (“Penn Power”), and West Penn Power Company (“West Penn”) (collectively, “First Energy” or “Companies”), with respect to the request for consolidation of proceedings and approval of the Phase IV Energy Efficiency and Conservation Plan (“EE&C Plan”). The Small Business Advocate has intervened in this case to ensure that the interests of small business customers served by the Companies are adequately represented.

In view of the foregoing, the Small Business Advocate will participate in proceedings


before the Public Utility Commission to investigate the reasonableness of the Companies' requested relief. The Small Business Advocate will ask the Commission to deny any proposed changes in the Companies' present tariffs that apply to small business customers that are not proven by the Companies to be lawful, just, reasonable and non-discriminatory to all its customer classes.

Dated: December 21, 2020

VERIFICATION

I, John R. Evans, hereby state that the facts set forth herein above are true and correct to the best of my knowledge, information and belief and that I expect to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa. C.S. § 4904 (relating to unsworn falsification to authorities).

Date: 12/21/2020



(Signature)

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Joint Petition for Consolidation of	:	
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Pennsylvania Electric Company,	:	M-2020-3020822
Pennsylvania Power Company, and West	:	M-2020-3020823
Penn Power Company	:	
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CERTIFICATE OF SERVICE

I hereby certify that true and correct copies of the foregoing have been served via email (*unless otherwise noted below*) upon the following persons, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

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The Honorable Charles E. Rainey Jr.
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Erin K. Fure
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Attorney ID No. 312245

DATE: December 21, 2020