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January 8, 2021

VIA ELECTRONIC FILING

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

RE: **Joint Petition for Consolidation of Proceedings and Approval of the Phase IV Energy Efficiency and Conservation Plans 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 for filing with The Pennsylvania Public Utility Commission is the Pennsylvania State University's Petition to Intervene in the above-captioned matter.

Thank you for your attention to this matter. If you have any questions, please feel free to contact me at (717) 236-1300.

Very truly yours,

/s/ Thomas J. Sniscak

Thomas J. Sniscak
Whitney E. Snyder
Bryce R. Beard

Counsel for The Pennsylvania State University

WES/das
Enclosures

cc: Honorable Mark Hoyer (via email mhoyer@pa.gov)
Honorable Emily DeVoe (via email edevoe@pa.gov)
Per Certificate of Service

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Joint Petition for Consolidation and Approval	:	
of the Act 129 Phase IV Energy Efficiency	:	M-2020-3020820
and Conservation Plan of Metropolitan	:	M-2020-3020821
Edison Company, Pennsylvania Electric	:	M-2020-3020822
Company, Pennsylvania Power Company,	:	M-2020-3020823
and West Penn Power Company	:	

**PETITION TO INTERVENE OF
THE PENNSYLVANIA STATE UNIVERSITY**

TO THE HONORABLE MARK HOYER AND HONORABLE EMILY DEVOE:

NOW COMES The Pennsylvania State University (“PSU”), by and through its attorneys, Hawke McKeon & Sniscak LLP, and files this Petition to Intervene in the above-captioned proceedings before the Pennsylvania Public Utility Commission (“Commission”) pursuant to 52 Pa. Code § 5.71 *et seq* of the Commission’s regulations. In support of its Petition to Intervene, PSU asserts the following:

1. On November 30, 2020, Metropolitan Edison Company, Pennsylvania Electric Company, Pennsylvania Power Company, and West Penn Power Company (“the Companies”) petitioned the Commission for approval of their Phase IV Energy Efficiency & Conservation (“EE&C”) Plans (“Phase IV Plans”). The Companies’ Phase IV EE&C costs and program measures may impact the rates and services charged to PSU.

2. All correspondence and pleadings in this docket should be directed to PSU's counsel in this matter:

Thomas J. Sniscak, Esquire, Attorney ID No. 33891
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Bryce R. Beard, Esquire, Attorney ID No. 325837
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3. Eligibility to intervene in Commission proceedings is governed by the Commission's regulations found at 52 Pa. Code § 5.72. The Commission's regulations provide that in order to have the ability to intervene, a party must have “a right or interest” sufficient to warrant intervention, which includes an interest that may be directly affected by the proceeding and which is not being adequately represented by existing participants, and where the petitioner may be bound by the actions of the Commission or where the right or interest is otherwise in the public interest. *Id.*

4. PSU has such an interest. PSU is a major generation, transmission and distribution service customer of West Penn at its University Park campus receiving service through West Penn's PA Retail Tariff 38. PSU is the only customer taking service under Tariff 38. As a large customer, and a unique customer that takes service under its own tariff, PSU will be substantially and directly affected by any decision, final order, or settlement in this matter and will be bound thereby. Moreover, no other party can represent PSU's interest under these circumstances.

5. For the reasons stated above, PSU's intervention in this matter meets the intervention standards of 52 Pa. Code § 5.72, and is otherwise in the public interest. Accordingly, PSU requests that this intervention be granted and that it be allowed full party status in this matter.

6. PSU will participate in this proceeding in compliance with Your Honors' January 6, 2021 Prehearing Order entered which sets the litigation schedule, discovery procedures, and other aspects for this proceeding. PSU intends to be an active party participating to ensure its unique interest are represented.

WHEREFORE, The Pennsylvania State University respectfully requests that Your Honors grant this Petition to Intervene, provided The Pennsylvania State University with full-party status in these proceedings, and allow such other relief as deemed necessary.

Respectfully submitted,

/s/ Thomas J. Sniscak

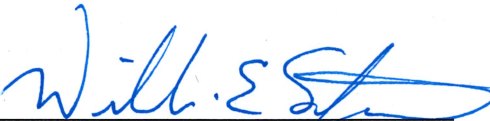
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Counsel for The Pennsylvania State University

Date: January 8, 2021

VERIFICATION

I, William E Sitzabee, Vice President for Facilities Management and Planning, The Pennsylvania State University, hereby state that the facts above set forth 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).



(Name) *William E Sitzabee*
(Title) *Vice President, Penn State*

Dated: 8 Jan 2021

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the forgoing document upon the parties, listed below, in accordance with the requirements of § 1.54 (relating to service by a party).

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/s/ Thomas J. Sniscak

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Dated: January 8, 2021