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January 18, 2022

*Via Electronic Filing*

Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street, 2<sup>nd</sup> Floor (filing room)  
PO Box 3265  
Harrisburg, PA 17105-3265

Re: Joint Petition of Metropolitan Edison Company, Pennsylvania Electric Company, Pennsylvania Power Company and West Penn Power Company for Approval of Their Default Service Programs; Docket Nos. P-2021-3030012, P-2021-3030013, P-2021-3030014 & P-2021-3030021; **PETITION TO INTERVENE OF THE PENNSYLVANIA STATE UNIVERSITY**

Dear Secretary Chiavetta:

Enclosed you will find The Pennsylvania State University's Petition to Intervene in the above-captioned matters. Copies have been served in accordance with the attached Certificate of Service.

Should you have any questions or comments, please feel free to contact me directly.

Very truly yours,

*/s/ Thomas J. Sniscak*

Thomas J. Sniscak  
Whitney E. Snyder  
Phillip D. Demanchick Jr.

*Counsel for The Pennsylvania State University*

TJS/das

Enclosures

cc: Honorable Jeffrey A. Watson (via email, [jeffwatson@pa.gov](mailto:jeffwatson@pa.gov))  
Nick Miskanic, Legal Assistant (via email, [nmiskanic@pa.gov](mailto:nmiskanic@pa.gov))  
Per the Certificate of Service

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

|   |   |                           |
|---|---|---------------------------|
| Petition of Metropolitan Edison Company<br>for Approval of Its Default Service Plan for<br>the Period From June 1, 2023 through May<br>31, 2027   | : |                           |
|   | : | Docket No. P-2021-3030012 |
|   | : |                           |
|   | : |                           |
| Petition of Pennsylvania Electric Company<br>for Approval of Its Default Service Plan for<br>the Period From June 1, 2023 through May<br>31, 2027 | : |                           |
|   | : | Docket No. P-2021-3030013 |
|   | : |                           |
|   | : |                           |
| Petition of Pennsylvania Power Company for<br>Approval of Its Default Service Plan for the<br>Period From June 1, 2023 through May 31,<br>2027    | : |                           |
|   | : | Docket No. P-2021-3030014 |
|   | : |                           |
|   | : |                           |
| Petition of West Penn Power Company for<br>Approval of Its Default Service Plan for the<br>Period From June 1, 2023 through May 31,<br>2027       | : |                           |
|   | : | Docket No. P-2021-3030021 |
|   | : |                           |
|   | : |                           |

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

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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 proceeding before the Pennsylvania Public Utility Commission (“Commission”). In support of its Petition, PSU avers as follows:

1. On December 14, 2021, Metropolitan Edison Company (“Met-Ed”), Pennsylvania Electric Company (“Penelec”), Pennsylvania Power Company (“Penn Power”) and West Penn Power Company (“West Penn”) (collectively the “FirstEnergy Companies”) filed a Joint Petition for Approval of their Default Service Plans (the “Joint Petition”) pursuant to Pennsylvania’s Electricity Generation Customer Choice and Competition Act, 66 Pa. C.S. § 2801, *et seq.*, as amended by Act 129 of 2008, the default service regulations of the Commission at 52 Pa. Code §§ 54.181-54.190, and the Commission’s policy statement on default service at 52 Pa. Code §§

69.1801-1817. The Joint Petition relates to default service rates to be charged by the FirstEnergy Companies during the period from June 1, 2023 through May 31, 2027.

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

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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 customer of all four of the FirstEnergy Companies. More specifically, PSU is a major generation, transmission, and distribution service customer of West Penn at its University Park campus receiving service through West Penn's Tariff Electric – Pa. P.U.C. No. 38 ("Tariff 38"). PSU is the only customer taking service under Tariff 38. PSU also receives generation, transmission and distribution service from West Penn under rate schedules other than Tariff 38 for approximately one hundred (100) additional accounts at the University Park campus, including the airport and campuses at New Kensington, Fayette and Mont

Alto. PSU is also a customer of Penelec taking service at Penn State Erie, The Behrend College and the Altoona and Dubois campuses, along with some accounts near University Park. PSU also receives service from Met-Ed at its campuses at York and at the Fruit Research and Extension Center in Biglerville. Lastly, the Shenango campus receives service from Penn Power. As a large customer of the FirstEnergy Companies, and a unique customer that takes service under its own tariff in the West Penn service territory, 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.

WHEREFORE, The Pennsylvania State University respectfully requests that this Petition be granted and that the Pennsylvania Public Utility Commission grant it full party status in the above-captioned matter.

Respectfully Submitted,

/s/ Thomas J. Sniscak

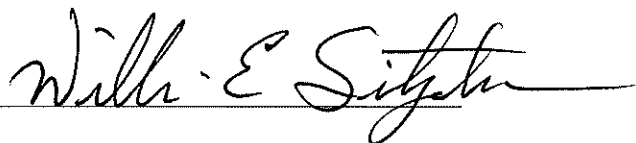
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*Counsel for  
The Pennsylvania State University*

Dated: January 18, 2022

## VERIFICATION

I, William E. Sitzabee, Vice President of Facilities Management and Planning & Chief Facilities Officer, on behalf of petitioner The Pennsylvania State University ("PSU"), hereby state that the facts set forth in the foregoing Petition to Intervene in Docket Nos. P-2021-3030012 *et al.* are true and correct to the best of my knowledge, information and belief and that I or any representative or witness on behalf of PSU expect to be able to prove the same at any 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).

Signature: 

Name: William E. Sitzabee, PhD, PE  
Position: Vice President of Facilities Management and Planning  
& Chief Facilities Officer  
For: The Pennsylvania State University

Date: January 18, 2022

## CERTIFICATE OF SERVICE

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

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*Counsel to the Met-Ed Industrial Users Group,  
the Penelec Industrial Customer Alliance, and  
the West Penn Power Industrial Intervenors*

*/s/ Thomas J. Sniscak*

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Thomas J. Sniscak  
Whitney E. Snyder  
Phillip D. Demanchick Jr.

Dated this 18<sup>th</sup> day of January, 2022.