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December 18, 2025

Matthew L. Homsher, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor
Harrisburg, PA 17120

VIA ELECTRONIC FILING

RE: Petition for Approval of the Phase V Energy Efficiency and Conservation Plan of FirstEnergy Pennsylvania Electric Company; Docket No. M-2025-3057327

Dear Secretary Homsher:

Attached for filing with the Pennsylvania Public Utility Commission is the Joint Petition to Intervene of the Met-Ed Industrial Users Group ("MEIUG"), the Penelec Industrial Customer Alliance ("PICA"), and the West Penn Power Industrial Intervenors ("WPPII") (collectively, "Industrial Customer Groups"), in the above-referenced proceeding.

As evidenced by the attached Certificate of Service, all parties to this proceeding are being duly served with a copy of this document. Thank you.

Sincerely,

A handwritten signature in black ink, appearing to read 'Rebecca Kimmel', written in a cursive style.

Rebecca Kimmel
MCNEES WALLACE & NURICK LLC

c: Charles E. Rainey Jr., Chief Administrative Law Judge (via e-mail)
Certificate of Service

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the foregoing document upon the participants, listed below, in accordance with the requirements of Section 1.54 (relating to service by a participant).

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Rebecca Kimmel

Counsel to the Met-Ed Industrial Users Group ("MEIUG"), the Penelec Industrial Customer Alliance ("PICA"), and the West Penn Power Industrial Intervenors ("WPPII")

Dated this 18th day of December, 2025, in Harrisburg, Pennsylvania.

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition for Approval of the Phase V	:	
Energy Efficiency and Conservation	:	Docket No. M-2025-3057327
Plan of FirstEnergy Pennsylvania	:	
Electric Company	:	

**JOINT PETITION TO INTERVENE
OF THE MET-ED INDUSTRIAL USERS GROUP,
PENELEC INDUSTRIAL CUSTOMER ALLIANCE,
AND WEST PENN POWER INDUSTRIAL INTERVENORS**

TO THE HONORABLE, THE PENNSYLVANIA PUBLIC UTILITY COMMISSION:

Pursuant to Sections 5.71 through 5.74 of the Pennsylvania Public Utility Commission's ("PUC" or "Commission") Regulations, 52 Pa. Code §§ 5.71-5.74, the Met-Ed Industrial Users Group ("MEIUG"), the Penelec Industrial Customer Alliance ("PICA"), and the West Penn Power Industrial Intervenors ("WPPII") (collectively, "Industrial Customer Groups") hereby file this Joint Petition to Intervene in response to the above-captioned filing of FirstEnergy Pennsylvania Electric Company ("FE PA" or "Company").

On November 26, 2025, FE PA petitioned the Commission for approval of the Company's Phase V Energy Efficiency & Conservation ("EE&C") Plan ("Phase V Plan"). FE PA's Petition for Approval of its Phase V Plan ("Petition") outlines the Company's proposal to address the requirements of Act 129 and the PUC's Phase V Implementation Order entered on June 18, 2025, at Docket No. M-2025-3052826 ("Implementation Order"). *See* Petition, p. 1.

According to FE PA, the Phase V Plan includes a suite of programs that are designed to meet the Company's Phase V consumption reduction targets and coincident peak demand reduction targets. *See id.* Through its Petition, FE PA also seeks approval to establish a non-bypassable Phase V EE&C-C Rider, which would recover the costs associated with developing

and implementing the Phase V Plan. *See id.* at 13. For Large Commercial and Industrial ("C&I") customers, the rates included in the Phase V EE&C-C Rider will be expressed and billed on an individual customer's Peak Load Contribution kilowatt ("kW PLC") basis. *See id.* at 14. As a result, FE PA's Phase V Plan costs and program measures may affect the rates and services of the Company's largest customers. It is therefore imperative that FE PA implement its Phase V EE&C Plan in a just and reasonable manner, consistent with Act 129, the PUC's Implementation Order, and all applicable statutes and regulations.

In support of its Petition to Intervene, the Industrial Customer Groups assert the following:

1. The Industrial Customer Groups are *ad hoc* associations of energy-intensive customers receiving electric service in the Company's service territory. As some of FE PA's largest customers, whose manufacturing and operational processes require significant amounts of electricity, any proposed modifications to the Company's electric rates could significantly impact the Industrial Customer Groups' production and operational costs.

2. The names and address of the Industrial Customer Groups' attorneys are:

Charis Mincavage (I.D. No. 82039)
Susan E. Bruce (Pa. I.D. No. 80146)
Rebecca Kimmel (I.D. No. 335097)
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3. The Industrial Customer Groups are comprised of MEIUG, PICA and WPPII. The compositions of MEIUG, PICA, and WPPII are attached hereto as Appendix A, Appendix

B, and Appendix C, respectively. MEIUG, PICA, and WPPII reserve the right to modify these Appendices throughout the course of these proceedings, as necessary.

4. The Industrial Customer Groups are concerned with issues regarding the terms and conditions of their electricity service, and, as a result, have been actively involved in numerous proceedings of FE PA, including regularly attending the Company's EE&C Plan stakeholder meetings.¹ The Commission's final disposition of the Company's Phase V Plans also directly affects the rates that FE PA imposes on the Industrial Customer Groups for electric service.

5. The Industrial Customer Groups thus have an interest in these proceedings that is not represented by any other party of record; consequently, the Industrial Customer Groups satisfy the standards for intervention under Section 5.72 of the Commission's Regulations, 52 Pa. Code § 5.72.

¹ In 2023, the PUC approved the consolidation of Metropolitan-Edison Company, Pennsylvania Electric Company, West Penn Power Company, and Pennsylvania Power Company ("Predecessor Companies") into FE PA. The Industrial Customer Groups participated in Phases I through IV of the Predecessor Companies' EEC Plans.

WHEREFORE, the Industrial Customer Groups respectfully request that the Pennsylvania Public Utility Commission grant this Joint Petition to Intervene, provide the Industrial Customer Groups with full-party status in this proceeding, and allow such other relief as it deems necessary.

Respectfully submitted,

McNEES WALLACE & NURICK LLC

By 

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Dated: December 18, 2025

APPENDIX A

MET-ED INDUSTRIAL USERS GROUP

Carpenter Technology Corporation

Knouse Foods Cooperative, Inc.

Lebanon Valley College

Royal Green LLC

Sweet Street Desserts, Inc.

APPENDIX B

PENELEC INDUSTRIAL CUSTOMER ALLIANCE

Electralloy, a G.O. Carlson, Inc., Co.

Ellwood National Steel

Indiana Regional Medical Center

Sheetz, Inc.

Team Ten, LLC – American Eagle Paper Mills

The Plastek Group, Inc.

The Proctor & Gamble Paper Products Company

APPENDIX C

WEST PENN POWER INDUSTRIAL INTERVENORS

Allegheny Technologies Incorporated
Carpenter Technology Corporation/Latrobe Specialty Metals
Cleveland-Cliffs Steel LLC
Ervin Industries

