

Morgan, Lewis & Bockius LLP  
1701 Market Street  
Philadelphia, PA 19103-2921  
Tel: 215.963.5000  
Fax: 215.963.5001  
www.morganlewis.com

**Morgan Lewis**  
C O U N S E L O R S   A T   L A W

**Anthony C. DeCusatis**  
Of Counsel  
215.963.5034  
adecusatis@MorganLewis.com

February 25, 2015

**VIA FEDERAL EXPRESS**

Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street  
Harrisburg, PA 17105-3265

**Re: Pennsylvania Public Utility Commission v. West Penn Power Company**  
**Docket Nos. R-2014-2428742 and M-2013-2341991**

Dear Secretary Chiavetta:

Enclosed are **Customer Class Rate Impact Analyses on behalf of West Penn Power Company** that are being filed in the above-referenced docket in compliance with the request of the presiding Administration Law Judges ("ALJs"). In addition to one hard copy, we have enclosed a CD containing a PDF of the Customer Class Rate Impact Analyses.

As evidenced by the enclosed Certificate of Service, copies of the Customer Class Rate Impact Analyses are being served on all parties, the presiding ALJs and the ALJs' technical advisors.

Very truly yours,



Anthony C. DeCusatis

ACD/tp  
Enclosures

c: Per Certificate of Service

**RECEIVED**

FEB 25 2015

PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

Almaty Astana Beijing Boston Brussels Chicago Dallas Dubai Frankfurt Harrisburg Hartford Houston London Los Angeles Miami Moscow  
New York Orange County Paris Philadelphia Pittsburgh Princeton San Francisco Santa Monica Silicon Valley Tokyo Washington Wilmington

Morgan, Lewis & Bockius LLP  
1701 Market Street  
Philadelphia, PA 19103-2921  
Tel: 215.963.5000  
Fax: 215.963.5001  
www.morganlewis.com

**Morgan Lewis**  
C O U N S E L O R S   A T   L A W

**Anthony C. DeCusatis**  
Of Counsel  
215.963.5034  
adecusatis@morganlewis.com

February 25, 2015

**VIA ELECTRONIC MAIL  
AND FEDERAL EXPRESS**

The Honorable Dennis J. Buckley  
Administrative Law Judge  
Office of Administrative Law Judge  
Pennsylvania Public Utility Commission  
Office of Administrative Law Judge  
400 North Street  
Harrisburg, PA 17120

The Honorable Katrina L. Dunderdale  
Administrative Law Judge  
Office of Administrative Law Judge  
Pennsylvania Public Utility Commission  
Pittsburgh District Office  
Piatt Place, Suite 220  
301 5th Avenue  
Pittsburgh, PA 15222

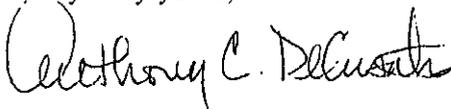
**Re: Pennsylvania Public Utility Commission v. West Penn Power Company  
Docket Nos. R-2014-2428742 and M-2013-2341991**

Dear Judge Buckley and Judge Dunderdale:

Pursuant to your request on February 23, 2015, enclosed are the **Customer Class Rate Impact Analyses on behalf of West Penn Power Company** in the above-captioned matter.

As evidenced by the enclosed Certificate of Service, copies of the Customer Class Rate Impact Analyses are being served on all parties of record and your technical advisors.

Very truly yours,



Anthony C. DeCusatis

ACD/tp

Enclosures

cc: Per Certificate of Service

**RECEIVED**

FEB 25 2015

PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

**RECEIVED**

FEB 25 2015

**West Penn Power Company  
Customer Class Rate Impact Analyses**

PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

**Residential Class**

Under the Settlement Rates, the monthly residential distribution customer charge will increase \$0.81 (or 16.2%), from \$5.00 to \$5.81. This increase in the distribution customer charge is in lieu of the Company's proposed monthly distribution customer charge of \$7.35, which represents a \$2.35 increase (or 47.0%). In addition, under the Settlement Rates, the bill for a typical Residential customer that uses 1,000 kWh per month will increase by \$12.15 per month, from \$92.47 to \$104.62<sup>1</sup> (or 13.1%), including default service generation, taxes and other rider surcharges. In comparison, in the Company's proposed filing, the bill for a typical Residential customer that uses 1,000 kWh per month would have increased by \$13.62 per month, from \$92.47 to \$106.09<sup>2</sup> (or 14.7%), including default service generation, taxes, and other rider surcharges.

**Commercial Class**

Under the Settlement Rates, the monthly distribution customer charge for a Schedule 30 customer will increase \$17.42 from \$0 to \$17.42 (there is no customer charge under current rates). This increase in the distribution customer charge is in lieu of the Company's proposed monthly distribution customer charge of \$17.79, which represents a \$17.79 increase. In addition, under the Settlement Rates, the bill for a typical Schedule 30 customer with monthly billing demand of 40 kW and 250 hours use of demand will increase by \$26.29 per month, from \$754.47 to \$780.76 (or 3.5%), including default service generation, taxes and other rider surcharges. In comparison, in the Company's proposed filing, the bill for a typical Schedule 30 customer with monthly billing demand of 40 kW and 250 hours use of demand would have increased by \$30.26 per month, from \$754.47 to \$784.73 (or 4.0%), including default service generation, taxes, and other rider surcharges.

**Industrial Class**

Under the Settlement Rates, the monthly distribution customer charge for a Schedule 46 customer will increase \$4.04 from \$0 to \$4.04 (there is no customer charge under current rates). This increase in the distribution customer charge is the same as the monthly distribution customer charge in the Company's proposed filing. In addition, under the Settlement Rates, the bill for a typical Schedule 46 customer with monthly billing demand of 20 MW and 474 hours use of demand will increase by \$5,538.53 per month, from \$370,737.95 to \$376,276.48 (or 1.5%), including default service generation, taxes and other rider surcharges. In comparison, in the Company's proposed filing, the bill for a typical Schedule 46 customer with monthly billing demand of 20 MW and 474 hours use of demand would have increased by \$13,618.41 per

<sup>1</sup> All calculations use riders in effect at 7-1-2014 and the price-to-compare as of 9-1-14, which assures that the rates are being compared on a consistent basis.

<sup>2</sup> West Penn Statement No. 1 (Direct Testimony of Charles V. Fullem), p. 10.

month, from \$370,737.95 to \$384,356.36 (or 3.7%), including default service generation, taxes, and other rider surcharges.

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**PENNSYLVANIA PUBLIC UTILITY  
COMMISSION**

v.

**WEST PENN POWER COMPANY**

**Docket Nos. R-2014-2428742  
M-2013-2341991**

**CERTIFICATE OF SERVICE**

I hereby certify that I served, on behalf of **West Penn Power Company**, on the following persons in the matter specified in accordance with the requirements of 52 Pa. Code § 1.54, a true and correct copy of the **Customer Class Rate Impact Analyses**.

**VIA ELECTRONIC MAIL AND FEDERAL EXPRESS**

The Honorable Dennis J. Buckley  
Administrative Law Judge  
Office of Administrative Law Judge  
Pennsylvania Public Utility Commission  
Office of Administrative Law Judge  
400 North Street  
Harrisburg, PA 17120  
[debuckley@pa.gov](mailto:debuckley@pa.gov)

The Honorable Katrina L. Dunderdale  
Administrative Law Judge  
Office of Administrative Law Judge  
Pennsylvania Public Utility Commission  
Pittsburgh District Office  
Piatt Place, Suite 220  
301 5th Avenue  
Pittsburgh, PA 15222  
[kdunderdal@pa.gov](mailto:kdunderdal@pa.gov)

**RECEIVED**

FEB 25 2015

PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

VIA ELECTRONIC MAIL AND FIRST CLASS MAIL

Aron J. Beatty  
Darryl A. Lawrence  
Brandon J. Pierce  
Kristine E. Robinson  
Lauren M. Burge  
Hobart J. Webster  
Office of Consumer Advocate  
555 Walnut Street, 5th Floor, ForUm Place  
Harrisburg, PA 17101-1923  
[abeatty@paoca.org](mailto:abeatty@paoca.org)  
[dlawrence@paoca.org](mailto:dlawrence@paoca.org)  
[bpierce@paoca.org](mailto:bpierce@paoca.org)  
[krobinson@paoca.org](mailto:krobinson@paoca.org)  
[lburge@paoca.org](mailto:lburge@paoca.org)  
[hwebster@paoca.org](mailto:hwebster@paoca.org)

Allison C. Kaster  
Carrie B. Wright  
Scott B. Granger  
Bureau of Investigation and Enforcement  
Pennsylvania Public Utility Commission  
400 North Street  
Harrisburg, PA 17120  
[akaster@pa.gov](mailto:akaster@pa.gov)  
[carwright@pa.gov](mailto:carwright@pa.gov)  
[sgranger@pa.gov](mailto:sgranger@pa.gov)

Daniel G. Asmus  
Assistant Small Business Advocate  
Office of Small Business Advocate  
Commerce Tower – Suite 202  
300 North Second Street  
Harrisburg, PA 17101  
[dasmus@pa.gov](mailto:dasmus@pa.gov)

Thomas J. Sniscak  
William E. Lehman  
Hawke, McKeon & Sniscak LLP  
P.O. Box 1778  
100 North Tenth Street  
Harrisburg, PA 17105-1778  
[tjsniscak@hmslegal.com](mailto:tjsniscak@hmslegal.com)  
[welehman@hmslegal.com](mailto:welehman@hmslegal.com)  
*Counsel for Pennsylvania State University*

Donald R. Wagner  
Linda R. Evers  
Michael A. Gruin  
Stevens & Lee  
111 North Sixth Street  
Reading, PA 19601  
[drw@stevenslee.com](mailto:drw@stevenslee.com)  
[lre@stevenslee.com](mailto:lre@stevenslee.com)  
[mag@stevenslee.com](mailto:mag@stevenslee.com)  
*Counsel for Wal-Mart*

Susan E. Bruce  
Vasiliki Karandrikas  
Teresa K. Schmittberger  
Elizabeth P. Trinkle  
McNees, Wallace & Nurick, LLC  
100 Pine Street  
P.O. Box 1166  
Harrisburg, PA 17108-1166  
[sbruce@mwn.com](mailto:sbruce@mwn.com)  
[vkandrikas@mwn.com](mailto:vkandrikas@mwn.com)  
[tschmittberger@mwn.com](mailto:tschmittberger@mwn.com)  
[etrinkle@mwn.com](mailto:etrinkle@mwn.com)  
*Counsel for WPPH*

Thomas T. Niesen  
Thomas, Niesen & Thomas, LLC  
212 Locust Street, Suite 600  
Harrisburg, PA 17101  
[tniesen@tntlawfirm.com](mailto:tniesen@tntlawfirm.com)  
*Counsel for Pennsylvania Rural Electric  
Association and Allegheny Electric  
Cooperative, Inc.*

David J. Dulick  
General Counsel  
Pennsylvania Rural Electric Association  
Allegheny Electric Cooperative, Inc.  
212 Locust Street  
P.O. Box 1266  
Harrisburg, PA 17108-1266  
[david\\_dulick@ccsenergy.com](mailto:david_dulick@ccsenergy.com)  
*Counsel for Pennsylvania Rural  
Electric Association and Allegheny  
Electric Cooperative, Inc.*

Scott J. Rubin  
333 Oak Lane  
Bloomsburg, PA 17815-2036  
[scott.j.rubin@gmail.com](mailto:scott.j.rubin@gmail.com)  
*Counsel for Utility Workers Union  
of America System Local 102*

David F. Boehm  
Boehm, Kurtz & Lowry  
36 East Seventh Street, Suite 1510  
Cincinnati, OH 45202  
[dboehm@bkllawfirm.com](mailto:dboehm@bkllawfirm.com)  
*Counsel for AK Steel Corporation*

Charles E. Thomas, III, Esquire  
Thomas, Niesen & Thomas, LLC  
212 Locust Street, Suite 600  
P.O. Box 9500  
Harrisburg, PA 17108-9500  
[cet3@tntlawfirm.com](mailto:cet3@tntlawfirm.com)  
[bmerola@noblesolutions.com](mailto:bmerola@noblesolutions.com)  
*Counsel for Noble Americas Energy  
Solutions LLC*

Michael Panfil  
John Finnigan  
EDF  
1875 Connecticut Avenue, N.W.  
Washington, DC 20009  
[mpanfil@edf.org](mailto:mpanfil@edf.org)  
[jfinnigan@edf.org](mailto:jfinnigan@edf.org)  
*Counsel for Environmental Defense Fund*

Heather Langeland  
200 First Avenue, Suite 200  
Pittsburgh, PA 15222  
[langeland@pennfuture.org](mailto:langeland@pennfuture.org)  
*Counsel for PennFuture*

VIA ELECTRONIC MAIL ONLY

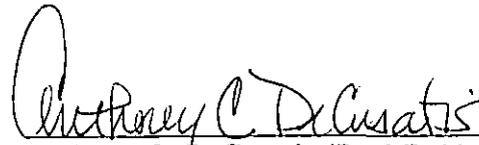
Debra Backer  
[dbacker@pa.gov](mailto:dbacker@pa.gov)

Lec Yalcin  
[lyalcin@pa.gov](mailto:lyalcin@pa.gov)

David Washko  
[dawashko@pa.gov](mailto:dawashko@pa.gov)

Marc Hoffer  
[mhoffer@pa.gov](mailto:mhoffer@pa.gov)

Andrew Herster  
[aherster@pa.gov](mailto:aherster@pa.gov)



Anthony C. DeCusatis (Pa. I.D. No. 25700)  
Catherine G. Vasudevan (Pa. I.D. No. 210254)  
Morgan, Lewis & Bockius LLP  
1701 Market Street  
Philadelphia, PA 19103-2921  
215.963.5234 (dir)  
215.963.5001 (fax)  
[adecusatis@morganlewis.com](mailto:adecusatis@morganlewis.com)  
[cvasudevan@morganlewis.com](mailto:cvasudevan@morganlewis.com)

*Counsel for West Penn Power Company*

Date: February 25, 2015

**RECEIVED**

FEB 25 2015

PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

