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December 22, 2017

Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street, 2<sup>nd</sup> Floor  
Harrisburg, PA 17120

**VIA ELECTRONIC FILING**

**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; Dockets Nos. P-2017-2637855; P-2017-2637857; P-2017-2637858; P-2017-2637866**

Dear Secretary Chiavetta:

Enclosed please find for filing with the Pennsylvania Public Utility Commission the Joint Petition to Intervene of the Med-Ed Industrial Users Group ("MEIUG"), the Penelec Industrial Customer Alliance ("PICA"), and the West Penn Power Industrial Intervenors ("WPPII") (collectively, the "Industrials"), in the above-referenced proceedings.

As shown by the attached Certificate of Service, all parties to these proceedings are being duly served.

Very truly yours,

McNEES WALLACE & NURICK LLC

By   
Alessandra L. Hylander

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

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Enclosures

c: Administrative Law Judge Mary D. Long (via e-mail and First-Class Mail)  
Certificate of Service

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Harrisburg, PA • Lancaster, PA • Scranton, PA • State College, PA • Columbus, OH • Frederick, MD • Washington, DC

## CERTIFICATE OF SERVICE

I hereby certify that I am this day serving a true copy of the foregoing document upon the participants listed below in accordance with the requirements of 52 Pa. Code Section 1.54 (relating to service by a participant).

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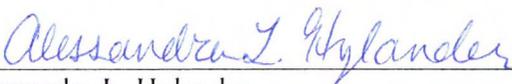
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Counsel to the Met-Ed Industrial Users Group,  
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and the West Penn Power Industrial Intervenors

Dated this 22<sup>nd</sup> day of December, 2017, at Harrisburg, Pennsylvania

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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-2017-2637855 P-2017-2637857 P-2017-2637858 P-2017-2637866
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**JOINT PETITION TO INTERVENE OF  
THE MET-ED INDUSTRIAL USERS GROUP,  
THE PENELEC INDUSTRIAL CUSTOMER ALLIANCE,  
AND  
THE WEST PENN POWER INDUSTRIAL INTERVENORS**

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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, the "Industrials") hereby file this Petition to Intervene in the above-captioned proceeding. In support of their Petition to Intervene, the Industrials assert as follows:

1. The Industrials are *ad hoc* associations of energy-intensive commercial and industrial customers receiving electric service in Metropolitan Edison Company's ("Met-Ed"), Pennsylvania Electric Company's ("Penelec"), and West Penn Power Company's ("West Penn" or "West Penn Power") (collectively, "Companies") service territories. The Industrials have been active in many Commission proceedings addressing the terms and conditions of the Companies' service.

2. The Industrials consume substantial amounts of electricity on an annual basis. MEIUG members receive service under Met-Ed's GS-Large, GP, and TP rate schedules; PICA members receive service under Penelec's GS-Large, GP, and LP rate schedules; and WPPII

members receive service primarily under West Penn Power's rate schedule 40. For purposes of this proceeding, MEIUG, PICA, and WPPII membership is listed on the attached Appendices A, B, and C, respectively. MEIUG, PICA, and WPPII will update the appendices as needed during the course of this proceeding to reflect changes in membership.

3. The names and address of attorneys for the Industrials are:

Susan E. Bruce (Pa. I.D. No. 80146)  
Charis Mincavage (Pa. I.D. No. 82039)  
Vasiliki Karandrikas (Pa. I.D. No. 89711)  
Alessandra L. Hylander (Pa. I.D. No. 320967)  
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The Industrials request that the names and address of their attorneys be added to the Commission's and all parties' service lists.

4. On December 4, 2017, the Companies petitioned the Commission for approval of a proposed plan for the terms and conditions under which the Companies would supply default service from June 1, 2019, through May 31, 2023.<sup>1</sup>

5. As users of substantial volumes of electricity in the Companies' service territories, the Industrials are directly impacted by changes to the terms and conditions of their electricity service, and, thus, are profoundly concerned with the resolution of the Companies' proposed DSP. The Commission's final disposition of the Companies' DSP will directly affect the rates

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<sup>1</sup> *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-2017-2637855, *et al.* (Dec. 4, 2017) ("Joint Petition" or "DSP V").

that the Companies impose on the Industrials, whether or not they receive default service. In addition, other parties' recommendations could adversely impact the Industrials. As some of the Companies' largest customers, the Industrials are in a unique position to address the effect of the Companies' proposed DSP on Large Commercial and Industrial customers.

6. The Industrials have an interest in this proceeding that is not represented by any other party of record. Thus, the Industrials satisfy the standards for intervention under Section 5.72 of the Commission's Regulations. 52 Pa. Code § 5.72. Accordingly, the Industrials should be granted intervenor status in this proceeding.

**WHEREFORE**, for the reasons stated above, the Met-Ed Industrial Users Group, the Penelec Industrial Customer Alliance, and the West Penn Power Industrial Intervenors respectfully request that the Pennsylvania Public Utility Commission:

- (1) Grant this Petition to Intervene, providing the Met-Ed Industrial Users Group, the Penelec Industrial Customer Alliance, and the West Penn Power Industrial Intervenors with intervenor-party status in this proceeding; and
- (2) Provide other such relief as it deems necessary.

Respectfully submitted,

McNEES WALLACE & NURICK LLC

By *Alessandra L Hylander*

Susan E. Bruce (Pa. I.D. No. 80146)  
Charis Mincavage (Pa. I.D. No. 82039)  
Vasiliki Karandrikas (Pa. I.D. No. 89711)  
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Counsel to the Met-Ed Industrial Users Group, the Penelec Industrial Customer Alliance, and the West Penn Power Industrial Intervenors

Dated: December 22, 2017



**APPENDIX A**

**MET-ED INDUSTRIAL USERS GROUP**

Airgas USA, LLC  
Carpenter Technology Corporation  
East Penn Manufacturing Company  
Glen-Gery Corporation  
Hanover Foods Corporation  
Knouse Foods Cooperative, Inc.  
Lebanon Valley College  
Magnesita Refractories Co.  
Royal Green LLC  
Sweet Street Desserts, Inc.

## APPENDIX B

### PENELEC INDUSTRIAL CUSTOMER ALLIANCE

Appvion, Inc.  
Electralloy, a G.O. Carlson, Inc., Co.  
Ellwood National Steel  
Erie Forge & Steel, Inc.  
Glen-Gery Corporation  
Indiana Regional Medical Center  
Pittsburgh Glass Works  
Sheetz, Inc.  
Standard Steel  
Team Ten, LLC - American Eagle Paper Mills  
The Plastek Group  
The Proctor & Gamble Paper Products Co.  
U.S. Silica Company  
Wegmans Food Markets, Inc.

**APPENDIX C**

**WEST PENN POWER INDUSTRIAL INTERVENORS**

Carpenter Technology Corporation/Latrobe Specialty Metals  
Ervin Industries  
Lehigh Specialty Melting Inc. (Whemco)  
MERSEN USA St Marys-PA Corp.