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February 8, 2017

VIA FEDERAL EXPRESS

Rosemary Chiavetta, Secretary Pennsylvania Public Utility Commission Commonwealth Keystone Building 400 North Street, 2nd Floor Harrisburg, PA 17105-3265



Re:

Petitions of Metropolitan Edison Company, Pennsylvania Electric Company, Pennsylvania Power Company and West Penn Power Company for Approval of a Distribution System Improvement Charge, Docket Nos. P-2015-2508942, et al.

Office of Consumer Advocate v. Metropolitan Edison Company, et al., Docket Nos. C-2016-2531040, et al.

Dear Secretary Chiavetta:

Enclosed for filing is the **Motion for Admission of Testimony and Exhibits** in the above-referenced matters. A copy has been served on Administrative Law Judge Joel H. Cheskis and the parties / intervenors of record in accordance with the attached Certificate of Service.

Very truly yours,

Anthony C. DeCusatis

Enclosures

c: Per Certificate of Service (w/encls.)

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Morgan, Lewis & Bockius LLP

PETITIONS OF METROPOLITAN : Docket Nos. P-2015-2508942, et al.

EDISON COMPANY, PENNSYLVANIA : ELECTRIC COMPANY, PENNSYLVANIA : POWER COMPANY AND WEST PENN

POWER COMPANY AND WEST PENN POWER COMPANY FOR APPROVAL OF

A DISTRIBUTION SYSTEM :

IMPROVEMENT CHARGE

OFFICE OF CONSUMER ADVOCATE : Docket Nos. C-2016-2531040, et al.

:

METROPOLITAN EDISON COMPANY,

v.

ETAL. :

CERTIFICATE OF SERVICE

I hereby certify and affirm that I have this day served a copy of the **Motion for Admission of Testimony and Exhibits** on the following persons in the matter specified in accordance with the requirements of 52 Pa. Code § 1.54:

VIA ELECTRONIC AND/OR FIRST CLASS MAIL

The Honorable Joel H. Cheskis Administrative Law Judge Pennsylvania Public Utility Commission 400 North Street Harrisburg, PA 17105-3265 jcheskis@pa.gov

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Respectfully submitted,

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Attorneys for Metropolitan Edison Company, Pennsylvania Electric Company, Pennsylvania Power Company and West Penn Power Company

Dated: February 8, 2017

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Petition of Metropolitan Edison Company for

Approval of a Distribution System Improvement : Docket

Charge

Docket No. P-2015-2508942

Office of Consumer Advocate

V.

Docket No. C-2016-2531040

Metropolitan Edison Company

Petition of Pennsylvania Electric Company for

Approval of a Distribution System Improvement

Charge

Docket No. P-2015-2508936

Office of Consumer Advocate

V.

Docket No. C-2016-2531060

Pennsylvania Electric Company

Petition of Pennsylvania Power Company for

Approval of a Distribution System Improvement

Charge

Docket No. P-2015-2508931

Office of Consumer Advocate

v.

Docket No. C-2016-2531054

Pennsylvania Power Company

Petition of West Penn Power Company for

Approval of a Distribution System Improvement

Charge

Docket No. P-2015-2508948

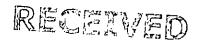
Office of Consumer Advocate

N.

V. : West Penn Power Company : Docket No. C-2016-2531019

MOTION FOR ADMISSION OF TESTIMONY AND EXHIBITS

February 8, 2017



FEB - 8 2017

PA PUBLIC UTILITY COMMISSION SECRETARY'S BUREAU

PETITIONS OF METROPOLITAN : EDISON COMPANY, PENNSYLVANIA :

ELECTRIC COMPANY,

PENNSYLVANIA POWER COMPANY : DOCKET NOS. P-2015-2508942

AND WEST PENN POWER COMPANY : P-2015-2508936 FOR APPROVAL OF A : P-2015-2508931

DISTRIBUTION SYSTEM : P-2015-2508948

IMPROVEMENT CHARGE

OFFICE OF CONSUMER ADVOCATE : DOCKET NOS. C-2016-2531040

v. : C-2016-2531060

METROPOLITAN EDISON : C-2016-2531054 COMPANY, : C-2015-2531019

PENNSYLVANIA ELECTRIC :

COMPANY,

PENNSYLVANIA POWER COMPANY AND WEST PENN POWER COMPANY

MOTION FOR ADMISSION OF TESTIMONY AND EXHIBITS

TO THE HONORABLE JOEL H. CHESKIS, ADMINISTRATIVE LAW JUDGE:

The undersigned move for admission into the evidentiary record of the statements and exhibits identified in the Stipulation For Admission Of Testimony And Exhibits ("Stipulation") attached hereto as Appendix A. This Motion and the Stipulation are being submitted in conjunction with the Joint Petition for Settlement of Pending Issues ("Joint Petition") that was filed in this proceeding on February 2, 2017.

Pursuant to the Stipulation, all active parties to this proceeding have stipulated the authenticity of the statements and exhibits listed therein and have waived cross-examination of the witnesses sponsoring those statements and exhibits, subject to the provisions of Paragraph

No. 34 of the Joint Petition (which address further proceedings in the event the Commission were to disapprove the Settlement). A copy of the Verification of the testimony and exhibits listed in Appendix A is provided in Appendix B to this Motion.

Accordingly, it is requested that the Administrative Law Judge grant this Motion and admit into the evidentiary record such statements and exhibits. Two copies of the statements and exhibits listed in the Stipulation that have not previously been filed with the Commission will be filed with the Secretary of the Commission after this Motion is granted.

Respectfully submitted,

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Dated: February 8, 2017

APPENDIX A

STIPULATION FOR ADMISSION OF TESTIMONY AND EXHIBITS

PETITIONS OF METROPOLITAN : EDISON COMPANY, PENNSYLVANIA :

ELECTRIC COMPANY,

PENNSYLVANIA POWER COMPANY : DOCKET NOS. P-2015-2508942 AND WEST PENN POWER COMPANY : P-2015-2508936 FOR APPROVAL OF A : P-2015-2508931

FOR APPROVAL OF A : P-2015-2508931 DISTRIBUTION SYSTEM : P-2015-2508948

IMPROVEMENT CHARGE

:

OFFICE OF CONSUMER ADVOCATE : DOCKET NOS. C-2016-2531040

v. : C-2016-2531060

METROPOLITAN EDISON : C-2016-2531054 COMPANY, : C-2015-2531019

PENNSYLVANIA ELECTRIC :

COMPANY,

PENNSYLVANIA POWER COMPANY AND WEST PENN POWER COMPANY

STIPULATION FOR ADMISSION OF TESTIMONY AND EXHIBITS

A Joint Petition For Settlement of Pending Issues ("Joint Petition") has been filed with the Pennsylvania Public Utility Commission at the above-referenced docket. The undersigned, being all of the active parties to this proceeding: (1) hereby stipulate the authenticity of the Statements and Exhibits listed below (the "Listed Statements and Exhibits"), which were previously served upon all parties in this proceeding, (2) acknowledge and agree that they waive cross-examination with respect to the Listed Statements and Exhibits subject to the exception stated in Paragraph No. 34 of the Joint Petition if the Commission were to reject the Settlement of Pending Issues; and (3) further stipulate that the Listed Statements and Exhibits may be admitted into the record in this case.

Listed Testimony And Exhibits

| Metropolitan Edison Company ("Met-Ed") | | |
|--|-------------------------|---|
| Statements | Met-Ed Statement No. 1 | Direct Testimony of Kevin M. Siedt |
| Exhibits | Met-Ed Exhibit Nos. 1-5 | Exhibits Accompanying Met-Ed Statement No. 1 |
| | Met-Ed Exhibit No. 6 | Met-Ed's Answers to the Office of Small Business Advocate's Interrogatories Sets I and II |

| Pennsylvania Electric Company ("Penelec") | | |
|---|--------------------------|--|
| Statements | Penelec Statement No. 1 | Direct Testimony of Kevin M. Siedt |
| Exhibits | Penelec Exhibit Nos. 1-5 | Exhibits Accompanying Penelec Statement No. 1 |
| | Penelec Exhibit No. 6 | Penelec's Answers to the Office of Small Business Advocate's Interrogatories Sets I and II |

| Pennsylvania Power Company ("Penn Power") | | |
|---|-----------------------------|---|
| Statements | Penn Power Statement No. 1 | Direct Testimony of Kevin M. Siedt |
| Exhibits | Penn Power Exhibit Nos. 1-5 | Exhibits Accompanying Penn Power Statement No. 1 |
| | Penn Power Exhibit No. 6 | Penn Power's Answers to Office of Small Business Advocate Interrogatories Sets I and II |

| West Penn Power Company ("West Penn") | | |
|---------------------------------------|----------------------------------|--|
| Statements | West Penn Statement No. 1 | Direct Testimony of Kevin M. Siedt |
| Exhibits | West Penn Power Exhibit Nos. 1-5 | Exhibits Accompanying West Penn Statement No. 1 |
| | West Penn Exhibit No. 6 | West Penn's Answers to Office of Small Business Advocate Interrogatories Sets I and II |

Accordingly, this Stipulation for Admission of Testimony and Exhibits is hereby submitted to accompany the Motion for Admission to be filed in the above-referenced consolidated proceedings.

Respectfully submitted:

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(PA Attorney ID No. B1489) FirstEnergy Service Company

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Dated: February 8, 2017



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APPENDIX B

VERIFICATION

PETITIONS OF METROPOLITAN : EDISON COMPANY, PENNSYLVANIA :

ELECTRIC COMPANY,

PENNSYLVANIA POWER COMPANY : DOCKET NOS. P-2015-2508942 AND WEST PENN POWER COMPANY : P-2015-2508936

FOR APPROVAL OF A : P-2015-2508931 DISTRIBUTION SYSTEM : P-2015-2508948

IMPROVEMENT CHARGE

:

OFFICE OF CONSUMER ADVOCATE : DOCKET NOS. C-2016-2531040

v. : C-2016-2531060

METROPOLITAN EDISON : C-2016-2531054 COMPANY, : C-2015-2531019

PENNSYLVANIA ELECTRIC :

COMPANY,

PENNSYLVANIA POWER COMPANY AND WEST PENN POWER COMPANY

VERIFICATION

I, **Kevin M. Siedt**, hereby state that I am employed by FirstEnergy Service Company as a Consultant in the Rates and Regulatory Affairs Department – Pennsylvania and that the facts set forth in the pre-marked statements and exhibits listed below are true and correct to the best of my knowledge, information and belief.

Testimony And Exhibits

| Metropolitan Edison Company ("Met-Ed") | | |
|--|-------------------------|--|
| Statements | Met-Ed Statement No. 1 | Direct Testimony of Kevin M. Siedt |
| Exhibits | Met-Ed Exhibit Nos. 1-5 | Exhibits Accompanying Met-Ed Statement No. 1 |
| | Met-Ed Exhibit No. 6 | Met-Ed's Answers to the Office of Small Business Advocate's Interrogatories Sets I and 2 |

| Pennsylvania Electric Company ("Penelec") | | |
|--|--------------------------|--|
| Statements Penelec Statement No. 1 Direct Testimony of Kevin M. Si | | |
| Exhibits | Penelec Exhibit Nos. 1-5 | Exhibits Accompanying Penelec Statement No. 1 |
| | Penelec Exhibit No. 6 | Penelec's Answers to the Office of Small Business Advocate's Interrogatories Sets I and II |

| Pennsylvania Power Company ("Penn Power") | | |
|---|-----------------------------|---|
| Statements | Penn Power Statement No. 1 | Direct Testimony of Kevin M. Sledt |
| Exhibits | Penn Power Exhibit Nos. 1-5 | Exhibits Accompanying Penn Power Statement No. 1 |
| | Penn Power Exhibit No. 6 | Penn Power's Answers to Office of Small Business Advocate Interrogatories Sets I and II |

| West Penn Power Company ("West Penn") | | |
|--|----------------------------------|--|
| Statements West Penn Statement No. 1 Direct Testimony of Kevin M | | |
| Exhibits | West Penn Power Exhibit Nos. 1-5 | Exhibits Accompanying West Penn Statement No. 1 |
| | West Penn Exhibit No. 6 | West Penn's Answers to Office of Small Business Advocate Interrogatories Sets I and II |

I understand that this verification is made subject to the provisions and penalties of 18 Pa.

C.S. § 4904 (relating to unsworn falsification to authorities).

Kevin M. Siedt

Dated: January __, 2017



7855 5139 8802

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400 NORTH ST FL 2

PHILADELPHIA, PA 19103 UNITED STATES US

REF. 00453-042057-0021

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17105

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- 2

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