


COMMONWEALTH OF PENNSYLVANIA



OFFICE OF CONSUMER ADVOCATE

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December 21, 2020

Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street  
Harrisburg, PA 17120

Re: Joint Petition for Consolidation of Proceedings  
and Approval of the Phase IV Energy Efficiency and  
Conservation Plan of Metropolitan Edison Company,  
Pennsylvania Electric Company, Pennsylvania Power  
Company, and West Penn Power Company  
Docket Nos. M-2020-3020820  
M-2020-3020821  
M-2020-3020822  
M-2020-3020823

Dear Secretary Chiavetta:

Attached for electronic filing please find the Office of Consumer Advocate's Notice of Intervention and Public Statement in the above-referenced proceedings.

Copies have been served per the attached Certificate of Service.

Respectfully submitted,

/s/ Christy M. Appleby  
Christy M. Appleby  
Assistant Consumer Advocate  
PA Attorney I.D. # 85824  
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Enclosures:

cc: Office of Administrative Law Judge (**email only**)  
Office of Special Assistants (**email only**: [ra-OSA@pa.gov](mailto:ra-OSA@pa.gov))  
Bureau of Technical Utility Services (**email only**)  
Certificate of Service

\*300978

CERTIFICATE OF SERVICE

Re: Joint Petition for Consolidation of Proceedings : Docket Nos. M-2020-3020820  
and Approval of the Phase IV Energy Efficiency : M-2020-3020821  
and Conservation Plan of Metropolitan Edison : M-2020-3020822  
Company, Pennsylvania Electric Company, : M-2020-3020823  
Pennsylvania Power Company, and West Penn :  
Power Company :

I hereby certify that I have this day served a true copy of the following document, the Office of Consumer Advocate's Notice of Intervention and Public Statement, upon parties of record in this proceeding in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant), in the manner and upon the persons listed below:

Dated this 21<sup>st</sup> day of December 2020.

**SERVICE BY E-MAIL ONLY**

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/s/ Christy M. Appleby  
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Dated: December 21, 2020  
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E-Mail: [ABeatty@paoca.org](mailto:ABeatty@paoca.org)

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Joint Petition for Consolidation of Proceedings and :  
Approval of Energy Efficiency and :  
Conservation Plans Phase III : Docket No. M-2020-3020820  
Metropolitan Edison Company, Pennsylvania :  
Electric Company, Pennsylvania :  
Power Company and West Penn Power Company :

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NOTICE OF INTERVENTION

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Pursuant to 52 Pa. Code 5.71-5.74, the Office of Consumer Advocate hereby gives its Notice of Intervention in the above-captioned proceeding. A copy of all correspondence and notices, documents, orders or other communications with respect to the above-captioned proceeding should be addressed to the following:

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Respectfully submitted,

*/s/ Christy M. Appleby*  
Christy M. Appleby  
Assistant Consumer Advocate  
PA. Attorney I.D. # 85824

DATE: December 21, 2020

PUBLIC STATEMENT OF THE OFFICE OF CONSUMER ADVOCATE  
PURSUANT TO 71 P.S. SECTION 309-4(e)

Act 161 of the Pennsylvania General Assembly, 71 P.S. Section 309-2, as enacted July 9, 1976, authorizes the Consumer Advocate to represent the interests of consumers before the Pennsylvania Public Utility Commission (Commission). In accordance with Act 161, and for the following reasons, the Consumer Advocate determined to intervene and participate in the Joint Petition for Consolidation of Proceedings and Approval of Energy Efficiency and Conservation Plans (EE&C Plan) Phase IV of Metropolitan Edison Company, Pennsylvania Electric Company, Pennsylvania Power Company and West Penn Power Company (Joint Petition).

On November 30, 2020, Metropolitan Edison Company (Met-Ed or Company) filed the Joint Petition, pursuant to Section 2806.1 of the Public Utility Code and pursuant to the Implementation Order entered by the Commission at Docket No. M-2020-3015228 on June 18, 2020. The five-year cost of the Company's EE&C Phase IV Plan is projected to be \$124,334,470. Met-Ed EE&C Plan at 21. The Company plans to reduce annual energy consumption by 463, 215 MWh and reduce demand by 76 MW by May 31, 2026. Met-Ed EE&C Plan at 21. With respect to residential customers, Met-Ed has proposed the following three residential customer energy efficiency programs: (1) Energy Efficient Products Program; (2) Energy Efficient Homes Program; and (3) the Low-Income Energy Efficiency Program. Met-Ed EE&C Plan at 35-36.

The Acting Consumer Advocate determined to intervene in this proceeding to protect the interests of Met-Ed's customers; to ensure that the proposed Plan and programs are in accordance with Act 129 and all other applicable statutes, regulations, and Commission Orders; and to ensure that any increase in rates resulting from the adoption of the proposed programs and any related expenses are just and reasonable.