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January 4, 2021

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

VIA ELECTRONIC FILING

RE: Joint Petition for Consolidation of Proceedings and Approval of the Phase IV Energy Efficiency and Conservation Plans 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 please find for filing with the Pennsylvania Public Utility Commission the Joint Petition to Intervene on behalf of the Met-Ed Industrial Users Group ("MEIUG"), the Penelec Industrial Customer Alliance ("PICA"), and the West Penn Power Industrial Intervenors ("WPPII"), in the above-referenced proceeding.

As shown by the attached Certificate of Service and per the Commission's March 20, 2020, Emergency Order, all parties to this proceeding are being duly served via email only due to the current COVID-19 pandemic. Upon lifting of the aforementioned Emergency Order, we can provide parties with a hard copy of this document upon request.

Sincerely,

McNEES WALLACE & NURICK LLC

By 
Charis Mincavage

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

c: Deputy Chief Administrative Law Judge Mark A. Hoyer
Certificate of Service

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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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the Penelec Industrial Customer Alliance, and
the West Penn Power Industrial Intervenor

Dated this 4th day of January, 2021, at Harrisburg, Pennsylvania

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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

**JOINT PETITION TO INTERVENE
OF THE MET-ED INDUSTRIAL USERS GROUP,
THE PENELEC INDUSTRIAL CUSTOMER ALLIANCE, AND
THE 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 the above-captioned filing of the Metropolitan Edison Company ("Met-Ed"), Pennsylvania Electric Company ("Penelec"), Pennsylvania Power Company ("Penn Power"), and West Penn Power Company ("West Penn") (collectively, "Companies").

On November 30, 2020, the Companies petitioned the Commission for approval of their Phase IV Energy Efficiency & Conservation ("EE&C") Plans ("Phase IV Plans"). The Companies' Joint Petition for Consolidation and Approval ("Joint Petition") seeks approval of the Companies' Phase IV Plans and, according to the Companies, includes a suite of programs designed to meet the additional consumption reduction targets and coincident peak demand

reduction targets adopted by the Commission's Phase IV Implementation Order¹ during the five-year period from June 1, 2021, through May 31, 2026 ("Phase IV Period"). *See* Joint Petition, p. 1. The Phase IV Plans follow Met-Ed's, Penelec's, Penn Power's, and West Penn Power's currently effective Phase III EE&C Plans, which were approved by the Commission on March 10, 2016, and will expire on May 31, 2021. According to the Companies, the proposed Phase IV Plan programs are generally an expansion of the elements currently included in the Phase III Plans and provide programs for all major customer segments, including programs for Large Commercial and Industrial ("C&I") customers. *See* Joint Petition, pp. 13-14.

The Companies propose to recover the costs associated with developing and implementing the Phase IV Plans through a non-bypassable Phase IV EE&C-C Rider. *See id.* at 14. For Large C&I customers, the rates included in the Phase IV EE&C-C Riders will be expressed and billed on an individual customer's Peak Load Contribution kilowatt ("kW PLC") basis. *Id.* at 15. As a result, the Companies' Phase IV EE&C costs and program measures may impact the rates and services of their largest customers. It is therefore imperative that the Companies implement their Phase IV EE&C Plans in a just and reasonable manner, consistent with Act 129, the PUC's Implementation Order, and all applicable statutes and regulations.

In support of their 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 Companies' service territories. As some of the Companies' largest customers, whose manufacturing and operational processes require

¹ On June 18, 2020, the PUC entered an Implementation Order addressing requirements for Phase IV EE&C Plans. *See Energy Efficiency and Conservation Plan Implementation Order*, Docket No. M-2020-30125228 (June 18, 2020) ("Implementation Order").

significant amounts of electricity, any proposed modifications to the Companies' 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:

Susan E. Bruce (Pa. I.D. No. 80146)
Charis Mincavage (Pa. I.D. No. 82039)
Jo-Anne Thompson (Pa. I.D. No. 325956)
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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 the Companies, including participation in the adjudication of the Companies' Phase I EE&C Plans, Phase II EE&C Plans, Phase III EE&C Plans, and regularly attending the Companies' EE&C Plan stakeholder meetings. The Commission's final disposition of the Companies' Phase IV Plans also directly affects the rates that the Companies impose 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.

WHEREFORE, 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 grant this Joint Petition to Intervene, provide the Industrial Customer Groups with full-party status in these proceedings, and allow such other relief as it deems necessary.

Respectfully submitted,

McNEES WALLACE & NURICK LLC

By 

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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: January 4, 2021

APPENDIX A

MET-ED INDUSTRIAL USERS GROUP

Air Liquide Industrial U.S. LP
Carpenter Technology Corporation
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 Operations, Inc.
Electralloy, a G.O. Carlson, Inc., Co.
Ellwood National Steel
Erie Forge & Steel, Inc.
Glen-Gery Corporation
Indiana Regional Medical Center
Sheetz, Inc.
Standard Steel
Team Ten, LLC – American Eagle Paper Mills
The Plastek Group, Inc.
The Procter & Gamble Paper Products Company
U.S. Silica Company
Wegmans Food Markets, Inc.

APPENDIX C

WEST PENN POWER INDUSTRIAL INTERVENORS

AK Steel

Carpenter Technology Corporation/Latrobe Specialty Metals

Ervin Industries