



McNees Wallace & Nurick LLC  
100 Pine Street  
P.O. Box 1166  
Harrisburg, PA 17108-1166

**Charis Mincavage**  
Direct Dial: 717.237.5437  
Direct Fax: 717.260.1725  
cmincavage@mcneeslaw.com

January 14, 2022

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; Docket Nos. P-2021-3030012; P-2021-3030013; P-2021-3030014; and P-2021-3030021**

Dear Secretary Chiavetta:

Attached for filing with the Pennsylvania Public Utility Commission is the Joint Petition to Intervene 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 proceedings.

As shown by the attached Certificate of Service, all parties to these proceedings are being duly served with a copy of this filing. If you have any questions regarding the documents, please feel free to contact the undersigned. Thank you.

Sincerely,

A handwritten signature in black ink that reads 'Charis Mincavage'.

Charis Mincavage  
MCNEES WALLACE & NURICK LLC

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

CM/ams

Enclosures

c: Administrative Law Judge Jeffrey A. Watson (via E-Mail)  
Nick Miskanic, Legal Assistant (via E-Mail)  
Certificate of Service

## CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true and correct copy of the foregoing document upon the participants, listed below, in accordance with the requirements of Section 1.54 (relating to service by a participant).

### VIA EMAIL

Tori L. Giesler, Esq.  
FirstEnergy  
2800 Pottsville Pike  
PO Box 16001  
Reading, PA 19612-6001  
[tgiesler@firstenergycorp.com](mailto:tgiesler@firstenergycorp.com)

Brooke E. McGlinn, Esq.  
Catherine G. Vasudevan, Esq.  
Kenneth M. Kulak, Esq.  
Morgan Lewis and Bockius LLP  
1701 Market Street  
Philadelphia, AP 19103  
[bmcglinn@morganlewis.com](mailto:bmcglinn@morganlewis.com)  
[cvasudevan@morganlewis.com](mailto:cvasudevan@morganlewis.com)  
[kkulak@morganlewis.com](mailto:kkulak@morganlewis.com)

Patrick M. Cicero, Esq.  
Christy Appleby, Esq.  
Darryl A. Lawrence, Esq.  
Harrison W. Breitman, Esq.  
Office of Consumer Advocate  
5th Floor Forum Place  
555 Walnut Street  
Harrisburg PA 17101-1923  
[pcicero@paoca.org](mailto:pcicero@paoca.org)  
[cappleby@paoca.org](mailto:cappleby@paoca.org)  
[dlawrence@paoca.org](mailto:dlawrence@paoca.org)  
[hbreitman@paoca.org](mailto:hbreitman@paoca.org)

Teresa Reed Wagner, Executive Director  
Steven C. Gray, Sr. Supervising Assistant  
Small Business Advocate  
Office of Small Business Advocate  
Forum Place – First Floor  
555 Walnut Street  
Harrisburg, PA 17101  
[tereswagne@pa.gov](mailto:tereswagne@pa.gov)  
[sgray@pa.gov](mailto:sgray@pa.gov)

Allison C. Kaster, Esq.  
Bureau of Investigation and Enforcement  
Commonwealth Keystone Building  
400 North Street, 2nd Floor West  
Harrisburg, PA 17120  
[akaster@pa.gov](mailto:akaster@pa.gov)

Elizabeth R. Marx, Esq.  
John Sweet, Esq.  
Lauren Berman  
Ria Pereira, Esq.  
PA Utility Law Project  
118 Locust Street  
Harrisburg, PA 1710  
[emarx@pautilitylawproject.org](mailto:emarx@pautilitylawproject.org)  
[jsweet@pautilitylawproject.org](mailto:jsweet@pautilitylawproject.org)  
[lberman@pautilitylawproject.org](mailto:lberman@pautilitylawproject.org)  
[rpereira@pautilitylawproject.org](mailto:rpereira@pautilitylawproject.org)

Christopher O'Hara  
Senior Vice President, General Counsel, Law  
& Chief Compliance Officer  
PJM Interconnection LLC  
2750 Monroe Boulevard  
Audubon, PA 19403-2497  
[christopher.ohara@pjm.com](mailto:christopher.ohara@pjm.com)

Deanne M. O'Dell  
Eckert Seamans Cherin & Mellott, LLC  
213 Market Street, 8th Floor  
P.O. Box 1248  
Harrisburg, PA 17101  
[dodell@eckertseamans.com](mailto:dodell@eckertseamans.com)  
*Counsel for RESA*

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Thomas J. Sniscak  
Hawke McKeon & Sniscak LLP  
100 North 10th Street  
P.O. Box 1778  
Harrisburg, PA 17105  
[tjsniscak@hmslegal.com](mailto:tjsniscak@hmslegal.com)  
*Counsel for Penn State University*



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Charis Mincavage

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

Dated this 14<sup>th</sup> day of January, 2022, in Harrisburg, Pennsylvania

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Joint Petition of Metropolitan Edison	:	
Company, Pennsylvania Electric Company,	:	Docket Nos. P-2021-3030012
Pennsylvania Power Company, and West	:	P-2021-3030013
Penn Power Company for Approval of	:	P-2021-3030014
Their Default Service Programs	:	P-2021-3030021

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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 proceedings. 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 these proceedings, 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 these proceedings 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)  
McNees Wallace & Nurick LLC  
100 Pine Street  
P.O. Box 1166  
Harrisburg, PA 17108  
Phone: 717-232-8000  
Fax: 717-237-5300  
sbruce@mcneeslaw.com  
cmincavage@mcneeslaw.com

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 14, 2021, 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, 2023, through May 31, 2027.<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 concerned with the resolution of the Companies' proposed DSP VI. The Commission's final disposition of the Companies' DSP VI will directly affect the rates 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

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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-2021-3030012, *et al.* (Dec. 14, 2021) ("Joint Petition" or "DSP VI").

Companies' largest customers, the Industrials are in a unique position to address the effect of the Companies' proposed DSP VI on Large Commercial and Industrial customers.

6. The Industrials have an interest in these proceedings 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.

**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 \_\_\_\_\_  
Susan E. Bruce (Pa. I.D. No. 80146)  
Charis Mincavage (Pa. I.D. No. 82039)  
100 Pine Street  
P. O. Box 1166  
Harrisburg, PA 17108-1166  
Phone: 717-232-8000  
Fax: 717-237-5300  
sbruce@mcneeslaw.com  
cmincavage@mcneeslaw.com

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

Dated: January 14, 2022



**APPENDIX A**

**MET-ED INDUSTRIAL USERS GROUP**

Air Liquide Industrial U.S. LP  
Carpenter Technology Corporation  
Glen-Gery Corporation  
Knouse Foods Cooperative, Inc.  
Lebanon Valley College  
Magnesita Refractories Co.  
Royal Green LLC  
Sweet Street Desserts, Inc.



## **APPENDIX B**

### **PENELEC INDUSTRIAL CUSTOMER ALLIANCE**

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 Proctor & Gamble Paper Products Company  
U.S. Silica Company  
Wegmans Food Markets, Inc.

**APPENDIX C**

**WEST PENN POWER INDUSTRIAL INTERVENORS**

Carpenter Technology Corporation/Latrobe Specialty Metals  
Cleveland-Cliffs Steel LLC  
Ervin Industries