

CONSUMER ADVOCATE DIVISION  
STATE OF WEST VIRGINIA  
PUBLIC SERVICE COMMISSION  
700 Union Building  
723 Kanawha Boulevard, East  
Charleston, West Virginia 25301  
(304) 558-0526

March 1, 2016

Ingrid Ferrell  
Executive Secretary  
Public Service Commission of West Virginia  
201 Brooks Street  
Charleston, West Virginia 25301

03:59 PM MAR 02 2016 PSC EXEC SEC DIV

RE: APPALACHIAN POWER COMPANY and  
WHEELING POWER COMPANY  
CASE NO. 16-0239-E-P

Dear Ms. Ferrell:

Enclosed for filing in the above-styled and numbered case, please find an original and 12 (twelve) copies of the Consumer Advocate Division's Petition to Intervene. Copies have been served upon all parties of record.

Sincerely,

David A. Sade  
State Bar No. 3229

Enclosures

cc: Parties of record

PUBLIC SERVICE COMMISSION  
OF WEST VIRGINIA  
CHARLESTON

APPALACHIAN POWER COMPANY and  
WHEELING POWER COMPANY

CASE NO. 15-1870-E-CN

**PETITION TO INTERVENE  
OF THE CONSUMER ADVOCATE DIVISION**

1. On March 1, 2016, Appalachian Power Company (APCO) and Wheeling Power Company (WPCO) (collectively the “Companies”), filed with the Commission the Companies’ 2016 Expanded Net Energy Cost (ENEC).

**INTERVENTION**

2. Pursuant to Rule 12.6 of the Commission's *Rules of Practice and Procedure* and *West Virginia Code*, §24-1-1(f)(2), the Consumer Advocate Division of this Commission (CAD) hereby petitions to intervene in the above-styled and numbered case on behalf of residential consumers of Appalachian Power Company and Wheeling Power Company.

3. The name and address of the CAD’s attorney is:

David A. Sade  
Consumer Advocate Division  
Public Service Commission of West Virginia  
723 Union Building, Suite 700  
Charleston, West Virginia 25301  
TSade@cad.state.wv.us  
304.558.0526

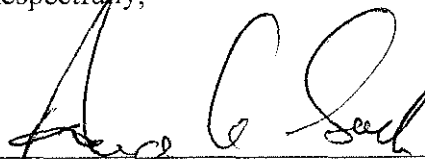
4. APCO and WPCO are public utilities engaged in the business of providing electric service in their prescribed and designated service area in the State of West Virginia and, as such, are subject to Chapter 24 of the Code of West Virginia of 1931, as amended, and the provisions thereof applicable to said class of public utilities.

5. The CAD is required by statute and rule to represent the interests of residential ratepayers in utility rate cases and related proceedings

6. The Companies' 2016 Expanded Net Energy Cost filing constitutes a proceeding with potential for adverse effects on residential consumers.

WHEREFORE, the Consumer Advocate Division respectfully requests that the Commission grant the CAD's Motion to Intervene.

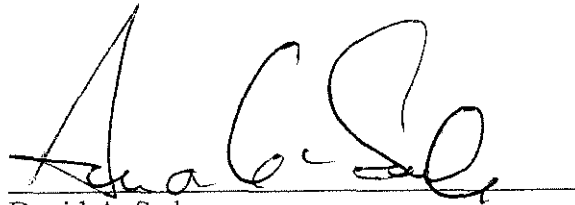
Respectfully,

A handwritten signature in black ink, appearing to read "David A. Sade", written over a horizontal line.

David A. Sade  
WV Bar No. 3229  
Counsel for Consumer Advocate  
Consumer Advocate Division  
Public Service Commission of West Virginia  
7th Floor, Union Building  
723 Kanawha Boulevard, East  
Charleston, West Virginia 25301

## **CERTIFICATE OF SERVICE**

I, David A. Sade, counsel for the Consumer Advocate Division of the Public Service Commission of West Virginia, (CAD), hereby certify that I have served a copy of the foregoing Consumer Advocate Division's Petition to Intervene upon all parties of record by First Class, U.S. Mail, postage pre-paid.

A handwritten signature in black ink, appearing to read "David A. Sade", written over a horizontal line.

David A. Sade  
State Bar No. 3229

Dated: March 2, 2016