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December 19, 2011

VIA ELECTRONIC FILING AND HAND DELIVERY
Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, Filing Room
Harrisburg, PA 17120

RE: Joint Petition of Metropolitan Edison Company, Pennsylvania Electric Company, Pennsylvania for Power Company and West Penn Power Company For Approval of their Default Service Programs, Docket Nos. P-2011-2273650, P-2011-2273668, P-2011-2273669, P-2011-2273670; **PETITION TO INTERVENE OF DOMINION RETAIL, INC.**

Dear Secretary Chiavetta:

Enclosed for filing with the Commission are the original and three (3) copies of the Petition to Intervene of Dominion Retail, Inc. d/b/a Dominion Energy Solutions in the above-captioned docket. Copies of this Petition have been served in accordance with the attached Certificate of Service.

Thank you for your attention to this matter. If you have any questions related to this filing, please contact the undersigned.

Very truly yours,

Todd S. Stewart
Counsel for Dominion Retail, Inc.

TSS/alh
Enclosures

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the foregoing document upon the parties, listed below, in the manner indicated below, and in accordance with the requirements of 52 P.A. Code §1.54 (relating to service by a party).

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Todd S. Stewart

Dated this 19th day of December 2011

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Joint Petition of Metropolitan Edison Company,	:	
Pennsylvania Electric Company, Pennsylvania for	:	Docket Nos. P-2011-2273650
Power Company and West Penn Power Company	:	P-2011-2273668
For Approval of their Default Service	:	P-2011-2273669
Programs	:	P-2011-2273670

PETITION TO INTERVENE OF
DOMINION RETAIL, INC.

AND NOW, comes Dominion Retail, Inc., d/b/a Dominion Energy Solutions ("DES"), by and through its counsel, Hawke McKeon & Sniscak, LLP, and hereby Petitions to Intervene in the above-captioned matter pursuant to 52 Pa. Code § 5.71, *et seq*. In support of its Petition to Intervene, DES states and avers as follows:

1. On or about November 17, 2011, Metropolitan Edison Company (Met-Ed), Pennsylvania Electric Company ("Penelec"), Pennsylvania Power Company ("PennPower") and West Penn Power Company ("West Penn") filed a *Joint Petition for Approval of their Default Service Implementation Plans*, at the above captioned dockets ("Joint Petition").

2. The Joint Petition was filed pursuant to § 2807(e) the Pennsylvania Public Utility Code ("Code"), and was published in the *Pennsylvania Bulletin* on December 3, 2011 which established the date of December 19, 2011 as the last date upon which Answers or Protests could be timely filed.

3. DES is the trade name of Dominion Retail, Inc. DES is an electric generation supplier licensed to serve customers throughout the Commonwealth of Pennsylvania. DES

presently provides service to residential customers in several of the service territories of the Joint Petitioners.

4. DES is represented in this matter by the following counsel:

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Please serve these counsel with copies of all pleadings and other filings in this docket.

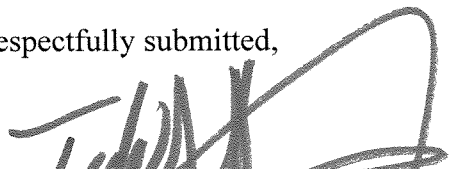
5. DES continues to review the Joint Petition; however, its initial review reveals at least one aspect of the proposed default service plan that DES supports, namely, the Joint Petition's inclusion of a Market Adjustment Charge. However, there are quite a few more provisions that DES believes will be harmful to development of a fully competitive market in Pennsylvania and which it therefore will oppose. These provisions include certain aspects of the proposed retail opt-in auction and customer referral program. While these proposals, as a general matter, may appear to be pro-competitive, the details are likely to diminish or eliminate competition in service territories of the affected companies. DES intends to pursue correction of these particular aspects of the Joint Petitions as a Party to this proceeding.

6. As an EGS operating across the Commonwealth, DES has a unique position and a substantial interest in the manner in which the Joint Petitioners implement such programs. The Joint Petitioners are the first EDCs in Pennsylvania to propose such programs, and have done so prior to the Commission providing final guidance on such programs, which the Commission is

expected to do during the pending Retail Markets Investigation ("RMI") process.[1] Accordingly, the specifics of the proposed programs may not only prove to be precedential, but have the potential to discourage or, worse, restrict customers from actively participating in choice for a significant geographic portion of the Commonwealth of Pennsylvania. Accordingly, DES believes that its interest is substantial and unique, and that no other party can adequately represent its interests. Moreover, as an EGS operating on the systems of the Joint Petitioners, DES will be bound by any Commission Order in this proceeding. Accordingly, DES believes that it meets the requirements of 52 Pa Code § 5.72(a) for standing to intervene in this proceeding.

WHEREFORE, DES respectfully requests that it Petition to Intervene in the above-captioned proceedings be granted and that it be allowed full party status in these matters.

Respectfully submitted,



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Counsel for Dominion Retail, Inc.,

Dated: December 19, 2011

[1] *RE: Investigation of Pennsylvania's Retail Electricity Market; Docket No. I-2011-2237952*