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May 24, 2012

**Via Electronic Filing**

Rosemary Chiavetta, Secretary  
PA Public Utility Commission  
PO Box 3265  
Harrisburg, PA 17105-3265

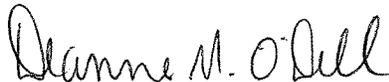
Re: Pennsylvania Public Utility Commission v. Petition of PPL Electric Utilities Corporation,  
Docket No. R-2012-2290597

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Dear Secretary Chiavetta:

On behalf of Direct Energy Services LLC("Direct Energy") enclosed please find the original of its Petition to Intervene along with the electronic filing confirmation with regard to the above referenced matter. Copies have been served in accordance with the attached Certificate of Service.

Sincerely,



Deanne M. O'Dell

DMO/lww  
Enclosure

cc: Hon. Susan D. Colwell, w/enc.  
Cert. of Service w/enc.

**CERTIFICATE OF SERVICE**

I hereby certify that this day I served a copy of Direct Energy's Petition to Intervene upon the persons listed below in the manner indicated in accordance with the requirements of 52 Pa. Code Section 1.54.

**Via Email and/or First Class Mail**

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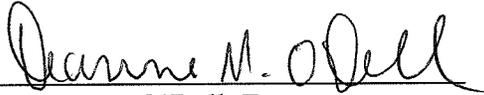
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Deanne M. O'Dell, Esq.

Dated: May 24, 2012

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission	:	
	:	Docket No. R-2012-2290597
v.	:	
	:	
Petition of PPL Electric Utilities Corporation	:	
	:	

**PETITION TO INTERVENE  
OF DIRECT ENERGY SERVICES, LLC**

Pursuant to 52 Pa. Code §§ 5.72-5.75, Direct Energy Services, LLC (“Direct Energy”) submits this Petition to Intervene in the above captioned proceeding. A Prehearing Conference Order was entered May 17, 2012 scheduling an Initial Prehearing Conference for May 31, 2012 before Administrative Law Judge Susan D. Colwell. In support of its intervention, Direct Energy states as follows:

**INTERVENTION**

1. Direct Energy is an electric generation supplier (“EGS”) licensed by the Commission at A-110164 to provide electricity and related services to retail customers throughout Pennsylvania, including PPL’s service territory. Direct Energy is a North American affiliate of Centrica plc, a leading international provider of energy and other energy-related services with over 32 million customer relationships worldwide. Direct Energy is one of North America’s largest energy and energy services companies with approximately 5.1 million customers, operating in 20 states, the District of Columbia, and all ten provinces in Canada. Direct Energy also owns and operates natural gas fired generation facilities, operates natural gas wells, has significant contracts for wind assets, and offers energy efficiency programs to help manage its customers overall energy bills. Direct Energy decided to locate its North American business corporate headquarters in Pittsburgh, with its employee base continuing to grow as it

expands its presence in the state. Lastly, Direct Energy has a unique business model, and extensive experience in providing energy services to residential, small and large commercial and industrial (“C&I”) customers, and government entities. Direct Energy offers retail energy customers many products and services, including variable, fixed-price, renewable, carbon neutral, demand response, and energy efficiency. .

2. Direct Energy’s attorneys in this matter are:

Daniel Clearfield, Esquire  
Deanne O’Dell, Esquire  
Carl Shultz, Esquire  
Eckert Seamans Cherin & Mellott, LLC  
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3. Direct agrees to accept electronic service to all attorneys listed above to be followed up with one hard copy of the documents served.

4. On March 30, 2012, PPL filed Supplement No. 118 to PPL Electric’s Tariff proposing an average increase in distribution rates of approximately 13%, which equates to an average increase in total rates (distribution, transmission, generation and transition charges) of approximately 2.9%. PPL is proposing that the new rates become effective on June 1, 2012.

5. In its filing, PPL addresses its Purchase of Receivables (“POR”) program as part of its filing specifically proposing to increase the discount rate at which PPL will purchase the accounts receivable served by electric generation suppliers (“EGSs”). PPL is also proposing to implement a new funding mechanism for customer education, including new customer education

initiatives that may be developed as a part of the Commission's Retail Markets Investigation proceeding at docket no. I-2011-2237952.

6. Intervention is permitted where a person has an interest in the proceeding which may be directly affected and which is not adequately represented by existing parties, and as to which the person may be bound by the action of the Commission in the proceeding. Intervention is also permitted where participation of the person may be in the public interest. 52 Pa. Code § 5.72(a). A "person" includes a corporation and an association. 52 Pa. Code § 1.8.

7. Direct Energy meets the standards for intervention set forth in 52 Pa. Code § 5.72(a). Direct Energy has interests that will be directly affected by this proceeding, particularly with respect to the POR program and funding for consumer education initiatives regarding customer choice.

8. Properly structured POR programs that promote competition and give EGSs access on a comparable basis to PPL's billing and collection system is a key requirement for the development of robust competition in PPL's service territory. Because of this, Direct Energy has been involved in nearly all prior PPL proceedings addressing the establishment of PPL's POR program. Direct Energy is also an active participant in the POR program; thus, the structure for the POR program will substantially affect Direct Energy.

9. Direct Energy's interests in this proceeding are unique from and not adequately represented by other parties that may seek to intervene, including individual EGSs or other organizations interested in electric competition in Pennsylvania in general and in PPL's service territory in particular.

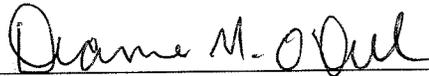
10. Direct Energy will be bound by the action of the Commission in this proceeding, which will address how the POR program will be structured going forward.

11. Direct Energy's intervention is in the public interest as it will .
12. Direct Energy's list of presently identified issues is set forth in its Prehearing Memorandum, which is incorporated herein by reference. Due to the early stage of this proceeding, Direct Energy reserves the right to raise and address issues identified through its continued review and analysis of PPL's filing (and related information), or other issues raised by other parties.

## CONCLUSION

**WHEREFORE**, Direct Energy Services, LLC respectfully requests that the Commission grant its intervention in this matter.

Respectfully submitted,



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Daniel Clearfield, Esquire

Deanne M. O'Dell, Esq.

Carl Shultz, Esq.

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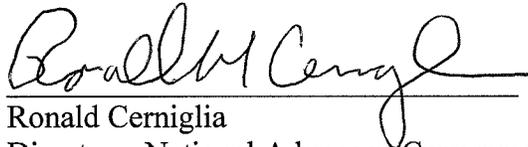
Date: May 24, 2012

Attorneys for Direct Energy Services, LLC

## VERIFICATION

I, Ronald Cerniglia, Director of National Advocacy Government and Regulatory Affairs of Direct Energy, LLC, hereby state that the facts set forth in the foregoing Petition are true and correct to the best of my knowledge, information and belief.

I understand that the statements herein are made subject to the penalties of 18 Pa.C.S. § 4904 (relating to sworn falsification to authorities).



Ronald Cerniglia  
Director – National Advocacy Government and  
Regulatory Affairs  
Direct Energy, LLC

Date: May 24, 2012