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February 11, 2013

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

VIA ELECTRONIC FILING

RE: Petition of PECO Energy Company For Approval of its Smart Meter Universal Deployment Plan; Docket No. M-2009-2123944

Dear Secretary Chiavetta:

Please find enclosed for filing with the Pennsylvania Public Utility Commission ("PUC" or "Commission") the Petition to Intervene of the Philadelphia Area Industrial Energy Users Group ("PAIEUG") in the above-referenced proceeding.

As evidenced by the attached Certificate of Service, all parties to this proceeding are being duly served with a copy of this document.

Sincerely,

McNEES WALLACE & NURICK LLC

By 
Adeolu A. Bakare

Counsel to the Philadelphia Area Industrial Energy Users Group

Enclosure

c: Chief Administrative Law Judge Charles E. Rainey, Jr. (via e-mail and First Class Mail)
Certificate of Service

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CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true 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).

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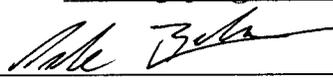
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Adeolu A. Bakare

Counsel to the Philadelphia Area Industrial Energy
Users Group

Dated this 11th day of February, 2013, in Harrisburg, Pennsylvania.

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of PECO Energy Company :
for Approval of Its Smart Meter Universal : Docket No. M-2009-2123944
Deployment Plan :

**PETITION TO INTERVENE OF
THE PHILADELPHIA AREA INDUSTRIAL ENERGY USERS GROUP**

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, the Philadelphia Area Industrial Energy Users Group hereby files this Petition to Intervene in the above-captioned proceeding. 52 Pa. Code §§ 5.71-5.74. In support thereof, PAIEUG avers as follows:

1. Petitioner is the Philadelphia Area Industrial Energy Users Group ("PAIEUG"). The composition of PAIEUG is attached hereto as Appendix A. PAIEUG reserves the right to modify Appendix A throughout the course of this proceeding, as necessary.

2. The names and address of PAIEUG's counsel are:

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3. PAIEUG is an ad hoc group of energy-intensive customers receiving electric service from PECO Energy Company ("PECO" or "Company") under Rates HT and PD. PAIEUG members use substantial volumes of electricity in their manufacturing and operational

processes, and these electric costs are a significant element of their respective costs of operation. Any modification to PECO's electric rates may impact PAIEUG members' cost of operations. The members of PAIEUG are therefore concerned with issues regarding the terms and conditions of their electricity service and, as a result, have been actively involved in numerous PECO proceedings, including PECO's initial Smart Meter Procurement and Installation Plan ("Initial Smart Meter Plan"), PECO's Phase I Act 129 Energy Efficiency and Conservation ("EE&C") Plan proceedings, and the Commission's ongoing review of PECO's Phase II EE&C Plan. Similarly, the Commission's final disposition of PECO's Smart Meter Universal Deployment Plan ("Universal Deployment Plan") may directly affect the rates that the Company imposes on PAIEUG members for service.

4. On August 14, 2009, consistent with the requirements of Act 129 and the Commission's Implementation Order entered June 24, 2009, at Docket No. M-2009-2092655, the Company filed a Petition of PECO Energy Company for Approval of Smart Meter Technology Procurement and Installation Plan ("Initial Petition") at Docket No. M-2009-2123944. The Initial Smart Meter Plan proposed procurement and deployment of 100,000 smart meters over 30 months. Initial Petition at 9. The Initial Smart Meter Plan bifurcated PECO's smart meter installations into the 30-month "grace" period and a subsequent universal deployment plan to be completed by 2019. Id. By Orders entered May 6, 2010, and June 3, 2012, the Commission approved PECO's Initial Smart Meter Plan, with modifications resulting from a partial settlement between PECO and several additional parties.

5. On January 18, 2013, consistent with the bifurcated deployment approved through the Initial Smart Meter Plan, PECO filed the Petition of PECO Energy Company for Approval of its Smart Meter Universal Deployment Plan at Docket No. M-2009-2123944 ("Universal

Deployment Petition"). The Universal Deployment Plan summarizes PECO's performance through the Initial Smart Meter Plan and outlines the projected benchmarks for universal deployment. PECO anticipates deployment of approximately 600,000 smart meters at conclusion of the Initial Plan. Universal Deployment Petition at 9. PECO further proposes to significantly accelerate the original 2019 benchmark for universal deployment and complete full-scale deployment of an additional 1.2 million smart meters by the end of 2014. Id. at 10.

6. PECO intends to recover the costs of its expedited Universal Deployment Plan through the non-bypassable Smart Meter Cost Recovery Charge ("SMCRC") approved through the Initial Smart Meter Plan proceeding. Although PECO now proposes to complete full deployment by 2014, the Company would maintain the original ten-year period for recovery of smart meter infrastructure and the Company's unrecovered investments in AMR meters. Id. at 12. Importantly, PECO has not proposed any modifications to the Commission-approved rate structure currently utilized for the SMCRC.

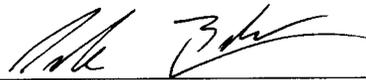
7. PAIEUG submits that, through this proceeding, the Commission should consider all issues attendant to whether PECO's Universal Deployment Plan is in accordance with Act 129, the June 24, 2009, Act 129 Implementation Order, and all other applicable statutes and regulations, in order to ensure that the proposed Universal Deployment Plan is in the interest of Pennsylvania's ratepayers. PAIEUG supports the Company's proposal to continue its current cost recovery mechanism and intends to further monitor both the costs of PECO's Universal Deployment Plan and any proposed modifications to the cost recovery mechanism. Specifically, PAIEUG's participation in this proceeding will seek to ensure that any cost allocation and accompanying cost recovery provides just and reasonable rates for Large Commercial and Industrial ("C&I") customers.

8. Members of PAIEUG may suffer adverse rate increases as a result of the Commission's determination in this proceeding. Moreover, some Large C&I customers have already spent significant sums of money installing metering systems. Therefore, it is particularly imperative that these customers do not subsidize meter installation for other customers or other customer classes. As some of the Company's largest customers, PAIEUG has an interest in this proceeding that is not represented by any other party of record. Consequently, PAIEUG satisfies the standards for intervention under Section 5.72 of the Commission's regulations. See 52 Pa. Code § 5.72.

WHEREFORE, the Philadelphia Area Industrial Energy Users Group respectfully requests that the Pennsylvania Public Utility Commission grant this Petition to Intervene and provide the Philadelphia Area Industrial Energy Users Group with full-party status in this proceeding.

Respectfully submitted,

McNEES WALLACE & NURICK LLC

By 

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Counsel to the Philadelphia Area Industrial
Energy Users Group

Dated: February 11, 2013

APPENDIX A

PHILADELPHIA AREA INDUSTRIAL ENERGY USERS GROUP

Air Liquide Industrial U.S. LP
Drexel University
GlaxoSmithKline
Jefferson Health System
Kimberly-Clark Corporation
Merck & Co., Inc.
Philadelphia College of Osteopathic Medicine
Saint Joseph's University
Temple University
The Boeing Company
Villanova University