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November 30, 2015

Via Electronic Filing

Rosemary Chiavetta, Secretary
PA Public Utility Commission
P.O. Box 3265
Harrisburg, PA 17105-3265

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 (DSP IV) – Docket Nos. P-2015-2511333; P-2015-2511351;
P-2015-2511355; and P-2015-2511356

Dear Secretary Chiavetta:

Enclosed for electronic filing please find Direct Energy Services, LLC's Petition to Intervene with regard to the above-referenced matter. Copies to be served in accordance with the attached Certificate of Service.

Sincerely,



Sarah C. Stoner

SCS/dsc
Enclosure

cc: Hon. David A. Salapa w/enc.
Cert. of Service w/enc.

CERTIFICATE OF SERVICE

I hereby certify that this day I served a copy of Direct Energy Services, LLC'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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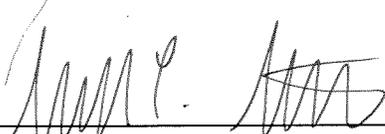
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Sarah C. Stoner, Esq.

Dated: November 30, 2015

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Joint Petition Of Metropolitan Edison Company, Pennsylvania Electric Company, Pennsylvania Power Company and West Penn Power Company for Approval of Their Default Service Program	:	Docket No. P-2015-2511333
	:	Docket No. P-2015-2511351
	:	Docket No. P-2015-2511355
	:	Docket No. P-2015-2511356

**DIRECT ENERGY SERVICES, LLC'S
PETITION TO INTERVENE**

Pursuant to 52 Pa. Code §§ 5.72-5.75, the public notices published in the Pennsylvania Bulletin on November 14, 2015 and the Prehearing Conference Order dated November 6, 2015, Direct Energy Services, LLC ("Direct Energy") petitions to intervene in the Joint Petition of Metropolitan Edison Company, Pennsylvania Electric Company, Pennsylvania Power Company and West Penn Power Company ("the Companies") for Approval of Their Default Service Programs ("DSP Petition"). In support of its intervention, Direct Energy states as follows:

1. On November 3, 2015, the Companies filed a petition proposing to establish the terms and conditions under which they will procure default service supplies, provide default service to non-shopping customers, satisfy requirements imposed by the Alternative Energy Portfolio Standards Act ("AEPS Act")¹ and recover all associated costs on a full and current basis for the period from June 1, 2017 through May 31, 2019.

2. By public notices published in the Pennsylvania Bulletin on November 14, 2015, the Commission established a deadline of November 30, 2015 for formal protests, petitions to

¹ 73 P. S. §§ 1648.1 - 1648.8 and related provisions of 66 Pa. C. S §§ 2813-2814.

intervene and answers. By Prehearing Conference Order dated November 6, 2015, Administrative Law Judge David A. Salapa scheduled an Initial Prehearing Conference for December 1, 2015 and directed parties and those intending to become parties to serve copies of their Prehearing Conference Memorandum on or before November 30, 2015. Direct Energy is simultaneously filing its Prehearing Conference Memorandum.

3. 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. Direct Energy is a North American affiliate of Centrica plc, a leading international provider of energy and other energy-related services, with over 30 million customer relationships worldwide. Direct Energy provides electricity, natural gas and other energy services to more than 5 million residential homes and businesses across North America. Direct Energy has a unique business model, and extensive experience in providing innovative gas and electricity products and services to residential, small and large commercial and industrial customers, utilities and government entities.

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

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5. The Commission's regulations allow intervention 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. 52 Pa. Code § 5.72(a)(2). Intervention is also permitted where participation of the person may be in the public interest. 52 Pa. Code § 5.72(a)(3). A "person" includes a corporation and an association. 52 Pa. Code § 1.8.

6. Direct Energy meets the standards for intervention set forth in 52 Pa. Code § 5.72(a). As an EGS in the Companies' service territories and in the Commonwealth, Direct Energy satisfies the standard for intervention because Direct Energy possesses an "interest which may be directly affected and which is not adequately represented by existing participants, and as to which the petitioner may be bound by the action of the Commission in the proceeding." 52 Pa. Code § 5.72(a)(1).

7. 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 these service territories in particular. Direct Energy is licensed by the Commission to provide service to customers in the Companies' service territories and has an interest in ensuring that the default service structure approved by the Commission will continue to do so as long as the market structure supports sustained and robust electric competition, especially among residential and small commercial customers. The Companies' proposed plan must be implemented in a competitively neutral manner to ensure that the market environment is conducive to Direct Energy's ability to offer competitive service. Direct Energy is a participant in the Companies' Purchase of Receivables program as well as their Customer Referral Program. As such,

proposals of the Companies related to these programs would directly impact Direct Energy. The Companies are also proposing to revise their supplier tariffs such that EGS refunds under the POR programs go directly to the Companies to apply to the customer's account balance first, if necessary, as opposed to EGS refunds going directly to the customer. Since Direct Energy serves customers in the Companies' service territories, the proposed change to the Companies' supplier tariffs would directly impact Direct Energy.

8. In view of Direct Energy's unique business model, its participation in the Companies' POR and CRP programs, Direct Energy's interests in this proceeding cannot be adequately represented by other EGS parties with different business models and different customer target markets.

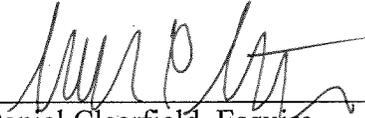
9. Direct Energy will be bound by the action of the Commission in this proceeding, which will determine the Companies' default service rates, terms and conditions effective June 1, 2017. Direct Energy must compete against these rates, and how they are structured will have a significant effect on the level of retail competition that will be experienced in the service territories during this period and, thus, on the ability of Direct Energy to continue to do business in these service territories. Thus, the Commission's actions regarding the Companies' proposals will have a substantial impact on Direct Energy's future involvement in the market.

10. Direct Energy's intervention is in the public interest. As a member of the Centrica group of companies providing energy and energy related services through over 30 million customer relationships worldwide, Direct Energy has the experience and resources to aid the Commission in carrying out its duties and responsibilities under the Electricity Generation Customer Choice and Competition Act to ensure that the goals of the Act are met. Accordingly,

Direct Energy's participation in this proceeding is clearly in the public interest. *See* 52 Pa. Code § 5.72(a)(3).

11. Direct Energy's list of presently identified issues is set forth in its Prehearing Conference 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 the Companies' filing (and related information), or other issues raised by other parties.

Respectfully submitted,



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Date: November 30, 2015

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