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April 19, 2016

Via Electronic Filing

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

Re: Petition of PECO Energy Company for Approval of its Default Service Program for the Period From June 1, 2017 Through May 31, 2019, Docket No. P-2016-2534980

Dear Secretary Chiavetta:

Enclosed for electronic filing please find Retail Energy Supply Association's ("RESA") Petition to Intervene with regard to the above-referenced matter. Copies to be served in accordance with the attached Certificate of Service.

Sincerely,

A handwritten signature in blue ink that reads "Deanne M. O'Dell".

Deanne M. O'Dell

DMO/lww
Enclosure

cc: Hon. Cynthia Williams Fordham w/enc.
Cert. of Service w/enc.

CERTIFICATE OF SERVICE

I hereby certify that this day I served a copy of RESA'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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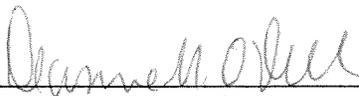
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Deanne M. O'Dell, Esq.

Dated: April 19, 2016

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of PECO Energy Company for :
Approval of Its Default Service Program :
for the Period From June 1, 2017 Through : Docket No. P-2016-2534980
May 31, 2019 :
:

**THE RETAIL ENERGY SUPPLY ASSOCIATION'S
PETITION TO INTERVENE**

Pursuant to 52 Pa. Code §§ 5.72-5.75, the public notice published in the Pennsylvania Bulletin on April 9, 2016 and the Prehearing Order dated April 12, 2016, the Retail Energy Supply Association (“RESA”)¹ petitions to intervene in the Petition of PECO Energy Company (“PECO”) for Approval of Its Default Service Program (“DSP Petition”). In support of its intervention, RESA states as follows:

1. On March 17, 2016, PECO filed a petition proposing to establish the terms and conditions under which it will procure default service supplies, provide default service to non-shopping customers, satisfy requirements imposed by the Alternative Energy Portfolio Standards Act (“AEPS Act”)² 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 notice published in the Pennsylvania Bulletin on April 9, 2016, the Commission established a deadline of April 19, 2016 for formal protests, petitions to intervene

¹ The comments expressed in this filing represent the position of the Retail Energy Supply Association (RESA) as an organization but may not represent the views of any particular member of the Association. Founded in 1990, RESA is a broad and diverse group of more than twenty retail energy suppliers dedicated to promoting efficient, sustainable and customer-oriented competitive retail energy markets. RESA members operate throughout the United States delivering value-added electricity and natural gas service at retail to residential, commercial and industrial energy customers. More information on RESA can be found at www.resausa.org.

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

and answers. Administrative Law Judge Cynthia W. Fordham scheduled an Initial Prehearing Conference for April 22, 2016 by Hearing Notice dated March 29, 2016 and a Prehearing Order on April 12, 2016. RESA is simultaneously filing its Prehearing Conference Memorandum.

3. RESA is a trade association of power marketers, independent power producers, and a broad range of companies within the Mid-Atlantic marketplace, each of whom support the electric services industry and seek to develop a more competitive power industry. RESA members are licensed to sell electric energy in the markets of Pennsylvania's major EDCs, including the service territory of PECO.

4. RESA'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. RESA meets the standards for intervention set forth in 52 Pa. Code § 5.72(a). As an organization whose members include competitive electric generation suppliers ("EGSs")

licensed to do business in the PECO's service territory, RESA has interests that will be directly affected by this proceeding. The ability of RESA's members to provide electric supply to retail customers in PECO's service territory will be specifically and substantially affected by the outcome of this proceeding, which will establish the terms and conditions under which PECO will acquire electric supply to serve its Default Service load from June 1, 2017 through May 31, 2019 and, thus, the rates against which RESA members must compete to sell electricity to retail customers in the PECO's service territory.

7. In addition, the petitions address various issues directly related to the ability of EGS to provide competitive alternative service to retail customers. These include proposed changes to PECO's current contract mix for residential and small commercial and industrial ("C&I") customers to incorporate more longer term contracts from the current process, the proposal to reduce the frequency of Large C&I hourly-priced default service rate filings, and reconciling the over/undercollection component of the Generation Supply Adjustment on a semi-annual basis instead of a monthly basis. These matter may direct affect the ability of RESA members to offer competitive service to customers in PECO's service territory.

8. RESA'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 PECO's service territories in particular. This is because RESA represents the interests of a diverse and broad group of electric generation suppliers in general, and not the interests of any individual member.

9. RESA's members will be bound by the action of the Commission in this proceeding, which will determine PECO's default service rates, terms and conditions for

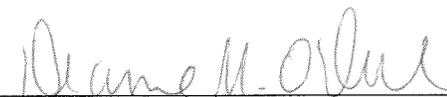
beginning June 2017 as well as the terms and conditions for the various retail market enhancement programs proposed by PECO.

10. RESA's intervention is in the public interest. RESA's participation will enable it to contribute the unique perspectives and insights of a trade association representing multiple EGSs and complete presentation of the issues to be addressed in this proceeding. It should be noted that RESA actively participated in the most recent default service proceeding that developed the current default service plans PECO as well as prior default service proceedings involving PECO.

11. RESA'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, RESA reserves the right to raise and address issues identified through its continued review and analysis of PECO's filing (and related information), or other issues raised by other parties.

WHEREFORE, RESA respectfully requests that the Commission grant RESA's Petition to Intervene.

Respectfully submitted,



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Date: April 19, 2016

Attorneys for Retail Energy Supply Association