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January 23, 2017


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

**Re: Petition of NRG Energy, Inc. for Implementation of Supplier Consolidated Billing
Docket No. P-2016-2579249**

Dear Secretary Chiavetta:

Attached please find a copy of the Comments and Answer of PECO Energy Company in Opposition to Petition of NRG, Energy Inc. for Implementation of Electric Generation Supplier Consolidated Billing. Also enclosed is PECO's Petition to Intervene in this matter. Please do not hesitate to contact me if you have any questions regarding this filing.

Very truly yours,



Kennedy S. Johnson
Assistant General Counsel

Enclosures

C: Certificate of Service

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PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of NRG Energy, Inc. for :
Implementation of Electric Generation : **Docket No. P-2016-2579249**
Supplier Consolidated Billing :

PETITION TO INTERVENE OF PECO ENERGY COMPANY

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INTRODUCTION

Pursuant to 52 Pa. Code Section 5.71 *et seq.*, PECO Energy Company ("PECO") hereby files this Petition to Intervene in the above-captioned proceeding. In support of this Petition, PECO states as follows:

BACKGROUND

1. On December 8, 2016, NRG Energy, Inc. ("NRG") filed a Petition for Implementation of Electric Generation Supplier Consolidated Billing (Petition).
2. By notice filed and published in the Pennsylvania Bulletin on December 24, 2016, the Pennsylvania Public Utility Commission ("Commission") directed that comments and answers be filed to NRG's Petition with the Secretary of the Commission on or before January 23, 2017.¹
3. Although not specifically requested in the Commission's notice, PECO is filing this Petition to Intervene so that it may participate fully in any proceedings held in the above-captioned matter.

ELIGIBILITY TO INTERVENE

4. Eligibility to intervene in Commission proceedings is governed by 52 Pa. Code § 5.72, which provides, in relevant part, that "[a] petition to intervene may be filed by a person claiming

¹ 46 Pa.B. 8154.

a right to intervene or an interest of such nature that intervention is necessary or appropriate to the administration of the statute under which the proceeding is brought.”²

5. Section 5.72 further provides that the right or interest may be one “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.”³

6. PECO is a Pennsylvania Electric Distribution Company (EDC) serving approximately 1.6 million electric and gas customers in Southeastern Pennsylvania.

7. In its Petition, NRG proposes state-wide implementation of Supplier Consolidated Billing (“SCB”). If approved, SCB would require EDCs to make changes to call center procedures, complaint response and processing, scripting, bill inserts and Commission-required education, termination procedures, CAP enrollment, and collections. As such, PECO would be directly affected by this proceeding’s outcome and would be bound by any Commission decision herein.

8. Therefore, no other party can adequately represent PECO’s interest in this proceeding. Accordingly, PECO’s Petition to Intervene should be granted.

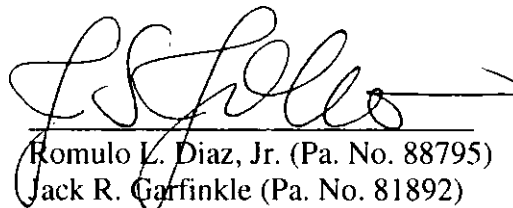
² 52 Pa. Code § 5.72(a).

³ 52 Pa. Code § 5.72(a)(2).

CONCLUSION

WHEREFORE, in consideration of the foregoing, PECO respectfully requests that the Commission grant its Petition to Intervene in this proceeding.

Respectfully submitted,



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Dated: January 23, 2017