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April 27, 2018

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

Re: Pa. PUC v. PECO Energy Co. - Electric Division
Docket No. R-2018-3000164

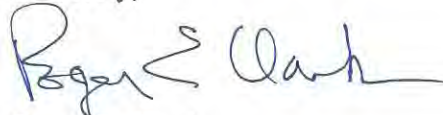
Dear Secretary Chiavetta:

Enclosed for filing please find the Petition to Intervene of the Delaware Valley Regional Planning Commission in the above-referenced proceeding.

I have today filed this Petition with the Commission's eFiling system.

I have also today served this document on the Administrative Law Judges and the parties of record as shown on the attached Certificate of Service.

Sincerely,



Roger E. Clark
PA Attorney # 24852

Attachments: Petition to Intervene
Certificate of Service

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission :

v. :

PECO Energy Company – Electric Division :

Docket No. R-2018-3000164

**PETITION TO INTERVENE
OF THE
DELAWARE VALLEY REGIONAL PLANNING COMMISSION**

Pursuant to 52 Pa. Code §§5.72-5.75, the Delaware Valley Regional Planning Commission hereby files this Petition to Intervene in the above-captioned proceeding. In support of this petition, DVRPC states as follows:

1. Petitioner is the Delaware Valley Regional Planning Commission (“**DVRPC**”), a bi-state Metropolitan Planning Organization (“**MPO**”) with offices in Philadelphia, Pennsylvania. DVRPC was formed in 1965 by an Interstate Compact legislatively enacted by both Pennsylvania and New Jersey and serves the Pennsylvania counties of Bucks, Chester, Delaware, Montgomery, and Philadelphia and the New Jersey counties of Burlington, Camden, Gloucester, and Mercer. DVRPC works to foster regional collaboration in creating and maintaining a livable, sustainable, and economically-competitive region. DVRPC staff work with municipal, city, county, and state representatives and many other partners to improve transportation, promote smart growth, protect the environment and build the economy. More information about DVRPC can be found at its website, <https://www.dvrpc.org/>.

2. DVRPC manages the Regional Streetlight Procurement Program (see www.dvrpc.org/energyclimate/eetrafficstreetlighting/Procurement/) which has helped 35 municipalities convert more than 24,000 streetlights to energy-efficient and long-lived LED fixtures. The program also support municipal adoption of smart LED fixtures with sensors which have the potential to further reduce energy usage and costs by dimming streetlights during nighttime. The streetlight conversions made to date will save an estimated 10,600,000 kWhs of electricity per year, which will reduce carbon dioxide emissions by 5,500 metric tons annually and save the participating municipalities \$1,400,000 a year in energy and operating costs. Additional municipalities are interested in joining a second phase of the program. Because of this program, DVRPC has a direct interest in PECO's streetlighting tariff and how it supports or conflicts with the Regional Streetlight Procurement Program.

3. More specifically, DVRPC wishes to intervene in this distribution rate case to be able to address the following issues:

- a. The changes proposed to the SL-E tariff for the service location distribution charge;
- b. The changes proposed to the SL-E tariff for the variable distribution charge;
- c. The lack of accurate datasets for street lighting service locations, taps, and luminaires and how this results in erroneous customer charges;
- d. The new tariff SL-C for Smart Lighting Control Lighting at Customer-Owned Facilities; and,
- e. Other issues that may arise of interest to DVRPC's members.

4. 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).

5. DVRPC meets the standards for intervention set forth in 52 Pa. Code §5.72(a). As the MPO for the region that covers almost all of the PECO service territory, DVRPC supports the ability for all municipalities in the region to take actions that benefit the environment, public safety, and the economy. The setting of fixed and variable distribution charges under the SL-E and SL-C tariffs and the maintaining of accurate data for streetlight locations, taps and lamps are ways this proceeding will directly impact DVRPC, its Regional Streetlight Procurement Program and the willingness of DVRPC’s members to install more efficient streetlighting, save energy and reduce their operating expenses. DVRPC appreciates PECO’s proposal to decrease the fixed distribution charge in the SL-E tariff and believes that moving a greater portion of the distribution costs to the variable distribution charge is warranted.

6. DVRPC’s interests in this proceeding are not represented by other parties seeking to intervene because DVRPC is the only regional entity engaged with municipalities on energy management in their operations, including streetlights.

7. DVRPC’s intervention is in the public interest because more than 95% of the municipalities in the DVRPC region maintain a street lighting system affected by PECO’s SL-E tariff, and all municipalities who wish to adopt smart streetlight controls could be affected by the SL-C tariff. Street lighting is a public good, and the cost to maintain and operate these systems is born by municipalities.

8. DVRPC's attorney in this matter is:

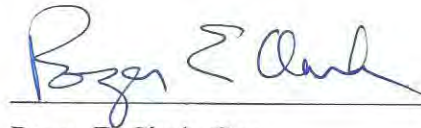
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As provided in 52 Pa. Code §1.54(b)(3), counsel consents to the service of documents by electronic mail to roger@rogerclarkconsulting.com.

WHEREFORE, the Delaware Valley Regional Planning Commission respectfully requests that the Commission grant this Petition to Intervene.

Respectfully submitted,



Roger E. Clark, Esq.
PA Attorney # 24852

Date: April 27, 2018

VERIFICATION

I, Barry Seymour, Executive Director of the Delaware Valley Regional Planning Commission, hereby state that the facts above set forth are true and correct to the best of my knowledge, information and belief, and that we expect to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa. C.S. §4904 (relating to unsworn falsification to authorities).



Barry Seymour
Executive Director
Delaware Valley Regional Planning Commission
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Date: April 27, 2018

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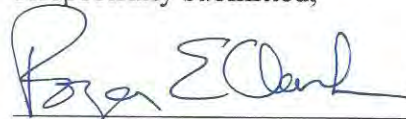
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Respectfully submitted,



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