

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission

v.

Docket No. R-2018-3000164

PECO Energy Company

TESLA INC.'S PETITION TO INTERVENE

Pursuant to 52 Pa. Code §§ 5.71, *et seq.*, Tesla, Inc. (“Tesla”) petitions to intervene in the above-captioned proceeding. In support of this petition, Tesla states the following:

1. On March 29, 2018, PECO Energy Company (“PECO”) filed a request for a base rate increase.
2. Tesla is a developer and manufacturer of the world’s most advanced electric vehicles and electric vehicle charging stations, among other clean energy products and services.
3. Tesla intends to construct and operate electric vehicle charging stations in the PECO service territory
4. Tesla anticipates that at least one of the issues being raised in this proceeding may directly affect its interests.
5. Tesla primarily seeks permission to intervene in PECO’s request for a general rate increase to examine the effect of PECO’s proposed Electric Vehicle DCFC Pilot Rider (EV-FC) (“Rider”), given Tesla’s extensive expertise and experience with the impacts of electric utility tariffs and their relationship with the development of electric vehicle charging, Tesla’s participation is essential.
6. Should Tesla’s intervention be granted, Tesla requests the right to actively participate in this proceeding, including presentation of direct or rebuttal testimony, and cross-examination of witnesses in this proceeding.
7. No other party to this proceeding represents the unique interests of Tesla.
8. Tesla takes no specific position at this time regarding PECO’s rate proposal or this Rider.

9. Tesla will be represented in this case by:

Mark C. Hammond (PA Attorney ID #75032)
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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 mhammond@landairwater.com

WHEREFORE, Tesla respectfully requests that the Commission grant Tesla's petition to intervene and order that Tesla be an active party to this proceeding and placed on the service list. Tesla also requests that the Commission grant such other relief as the Commission may deem necessary and proper.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Mark C. Hammond', written over a horizontal line.

Mark C. Hammond, Esquire
PA Attorney ID # 75032

Date: May 3, 2018

Verification

I, Kevin Auerbacher, Esquire, Senior Counsel of Tesla, Inc., 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).



Kevin Auerbacher, Esquire
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Certificate of Service

I, Mark Hammond, hereby certify that on the 3rd day of May, 2018, a true and correct copy of the foregoing Petition to Intervene was filed electronically on the Commission's electronic filing system and was served on the following persons via electronic and first class mail:

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May 3, 2018

A handwritten signature in black ink, appearing to read "Charles T. Joyce", is written over a horizontal line.