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May 4, 2018

Via Electronic Filing

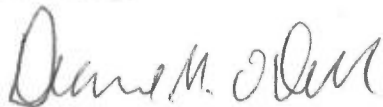
Rosemary Chiavetta, Secretary
PA Public Utility Commission
PO Box 3265
Harrisburg, PA 17105-3265

Re: Pennsylvania Public Utility Commission v. PECO Energy Company,
Office of Consumer Advocate v. PECO Energy Company
Office of Small Business Advocate v. PECO Energy Company
Docket Nos. R-2018-3000164; C-2018-3001112; C-2018-3001043

Dear Secretary Chiavetta:

Enclosed for electronic filing please find the 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,



Deanne M. O'Dell

DMO/lww
Enclosure

cc: Hon. Christopher P. Pell w/enc.
Hon. F. Joseph Brady 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.

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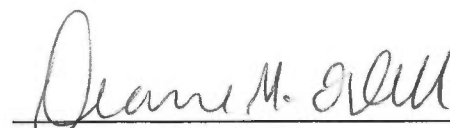
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Deanne M. O'Dell, Esq.

Dated: May 4, 2018

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

| | | |
|---|---|----------------|
| Pennsylvania Public Utility Commission | : | R-2018-3000164 |
| Office of Consumer Advocate | : | C-2018-3001112 |
| Office of Small Business Advocate | : | C-2018-3001043 |
| v. | : | |
| | : | |
| | : | |
| PECO Energy Company – Electric Division | : | |

**PETITION TO INTERVENE
OF RETAIL ENERGY SUPPLY ASSOCIATION**

Pursuant to 52 Pa. Code §§ 5.72-5.75, the Retail Energy Supply Association (“RESA”)¹ submits this Petition to Intervene in the above-captioned base rate proceeding initiated by PECO Energy Company (“PECO” or “Company”). In support of its intervention, RESA states as follows:

1. On March 29, 2018, PECO initiated this base rate proceeding by the filing of Tariff Electric – Pa. PUC No. 6. By Order entered on April 19, 2018, the Commission suspended the base rate filing for investigation until December 28, 2018. The Commission scheduled a prehearing conference for May 8, 2018 at 9:30 a.m. by Prehearing Conference Notice dated April 20, 2018. By Prehearing Order dated April 20, 2018, Deputy Chief Administrative Law Judge Christopher P. Pell and Administrative Law Judge F. Joseph Brady

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 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.

directed the filing of prehearing memoranda no later than 12:00 p.m. on May 4, 2018. RESA is simultaneously filing its Prehearing Memorandum.

2. 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 electric distribution companies ("EDCs"), including the service territory of PECO.

3. RESA's attorneys in this matter are:

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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 participants, and as to which the petitioner may be bound by the action of the Commission." 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. 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. RESA has presently identified the following issues set forth in its

Prehearing Memorandum: (1) the proposed Electric Vehicle Direct Current Fast Charger Pilot Rider; (2) PECO's initiatives to improve the direct billing relationship it has with its distribution customers; (3) PECO's proposed modifications to net metering eligibility; (4) PECO's proposed allocation of costs to distribution functions that are related to the provision of default service and should be removed from distribution charges; and (5) proposals to streamline the interconnection process for distributed generation technologies. With members operating in PECO's service territory, RESA is concerned about the potential anti-competitive impacts that may result from efforts of PECO to utilize ratepayer funded resources to offer value-added, generation-related products and services that are more appropriately offered in the competitive market. PECO's proposed allocation of costs to distribution functions for functions that are related to the provision of default service need to be analyzed to ensure that the cost allocation does not negatively impact the ability of EGSs to present competitive products to consumers in PECO's service territory. 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.

6. 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.

7. RESA will be bound and directly affected by the Commission's order in this proceeding. It is necessary for RESA to have an opportunity to raise issues related to

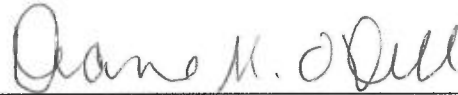
proposals contained in the base rate filing, as the outcome of this proceeding will be binding on RESA and its members serving retail customers in PECO's service territory.

8. 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.

9. Consequently, pursuant to 52 Pa. Code § 5.72, RESA should be permitted to intervene in this proceeding.

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

Respectfully submitted,



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Date: May 4, 2018

Attorneys for Retail Energy Supply Association