

213 Market Street, 9th Floor, P.O. Box 865, Harrisburg, PA 17108-0865
Tel: (717) 237-7160 ■ Fax: (717) 237-7161 ■ www.WolfBlock.com

Deanne M. O'Dell
Direct Dial: (717) 255-3744
Direct Fax: (717) 237-7314
E-mail: dodell@wolfblock.com

March 11, 2009

Via Electronic Filing

James McNulty
Secretary
PA Public Utility Commission
Commonwealth Keystone Bldg.
2nd Fl., 400 North Street
P.O. Box 3265
Harrisburg, PA 17105-3265

Re: Petition of PPL Electric Utilities Corporation for Approval
of a Rate Mitigation Plan
Docket No. P-2009-2091280

Dear Secretary McNulty:

On behalf of Direct Energy Services, LLC ("Direct Energy") enclosed please find its Petition to Intervene and the electronic filing confirmation page with regard to the above-referenced matter. Copies have been served in accordance with the attached Certificate of Service.

Sincerely,



Deanne M. O'Dell
For WolfBlock LLP

DMO/lww
Enclosure

cc: Cert. of Service w/enc.

HAR:88563.1/DIR023-251151

CERTIFICATE OF SERVICE

I hereby certify that this day I served a copy of Direct Energy'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

Steven C. Gray, Esq.
Daniel G. Asmus, Esq.
Office of Small Business Advocate
Suite 1102, Commerce Bldg.
300 North Second St.
Harrisburg, PA 17101
sgray@state.pa.us
dasmus@state.pa.us

David M. Kleppinger, Esq.
Pamela C. Polacek, Esq.
McNees Wallace & Nurick LLC
100 Pine St.
PO Box 1166
Harrisburg, PA 17108-1166
dkleppinger@mwn.com
ppolacek@mwn.com

Todd Stewart, Esq.
Hawke McKeon & Sniscak
100 North Tenth St.
PO Box 1778
Harrisburg, PA 17105
TSSStewart@hmslegal.com

Tanya J. McCloskey, Esq.
James A. Mullins, Esq.
Office of Consumer Advocate
555 Walnut St., 5th Fl.
Harrisburg, PA 17101-1923
tmccloskey@paoca.org
jmullins@paoca.org

Barbara R. Alexander
83 Wedgewood Drive
Winthrop, ME 04364
barbalex@ctel.net

Kenneth L. Mickens, Esq.
Office of Trial Staff
PA PUC
PO Box 3265
Harrisburg, PA 17105-3265
kmickens@state.pa.us

Christopher Lewis, Esq.
Christopher R. Sharp, Esq.
Blank Rome, LLP
One Logan Square
130 N. 18th St.
Philadelphia, PA 19103-6908
lewis@blankrome.com
sharp@blankrome.com

Anthony E. Gay, Esq.
Exelon Business Services Company
2301 Market St.
Philadelphia, PA 19101
Anthony.gay@exeloncorp.com

Brian J. Knipe, Esq.
Buchanan Ingersol & Rooney, PC
One South Market Square
213 Market St., 3rd Fl.
Harrisburg, PA 17101-2121
Brian.knipe@bipc.com

George J. Jugovic, Jr., Esq.
PennFuture
425 Sixth Ave., Suite 2770
Pittsburgh, PA 15219
jugovic@pennfuture.org

Eric J. Epstein
4100 Hillsdale Rd.
Harrisburg, PA 17112
ericepstein@comcast.net

Thomas T. Niesen, Esq.
Michael L. Swindler
Thomas Long Niesen & Kennard
212 Locust St.
PO Box 9500
Harrisburg, PA 17108-9500
tnieson@thomaslonglaw.com
mwindler@thomaslonglaw.com

Mark A. Baird, Esq.
Gretchen Schott, Esq.
Reliant Energy
1000 Main St.
Houston, TX 77002
mbaird@reliant.com
gschott@reliant.com

Glen R. Thomas, President
GT Power Group
1060 First Ave., Suite 400
King of Prussia, PA 19406
gthomas@gtpowergroup.com

Kathy J. Kolich, Esq.
FirstEnergy Corp
76 S. Main Street
Akron, OH 44308
kjkolich@firstenergycorp.com

Stephen L. Feld, Esq.
Linda Evers, Esq.
FirstEnergy
76 South Main St.
Akron, OH 44308
felds@firstenergycorp.com
levers@firstenergycorp.com

Dated: March 11, 2009

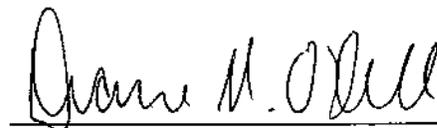
David B. MacGregor, Esq.
Post & Schell
Four Penn Center
1600 John F. Kennedy Blvd.
Philadelphia, PA 19103
dmacgregor@postschell.com

Kent D. Murphy, Esq.
UGI Corporation
460 N. Gulph Rd.
King of Prussia, PA 19406
murphyke@ugicorp.com

Jennifer Petrisek, Esq.
Strategic Energy
Two Gateway Center
Pittsburgh, PA 15222-1458
jpetrisek@strategicenergy.com

Craig A. Doll, Esq.
PO Box 403
25 West Second St.
Hummelstown, PA 17112
Cdoll76342@aol.com

Gene Stilp
1550 Fishing Creek Valley Road
Harrisburg, PA 17112
genestilp@comcast.net



Deanne M. O'Dell, Esq.

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of PPL Electric Utilities :
Corporation for Approval of a Rate : Docket No. P-2009-2091280
Stabilization Plan :

PETITION TO INTERVENE OF DIRECT ENERGY SERVICES, LLC

Pursuant to 52 Pa. Code §§ 5.71-5.75 and the Pennsylvania Public Utility Commission (“Commission”) notice published on March 7, 2009, in the Pennsylvania Bulletin, 39 Pa.B. 128, Direct Energy Services, LLC (“Direct Energy”) petitions to intervene in above-captioned proceedings filed by PPL Electric Utilities Corporation (“PPL”). In support of its intervention, Direct Energy states as follows:

1. Direct Energy is licensed by the Commission at No. A-110164 to provide electricity and related services to all classes of retail customers throughout Pennsylvania, including PPL's service territory. Direct Energy is the North American affiliate of Centrica plc, a leading provider of energy and energy-related services with over 30 million customer relationships worldwide. In North America, Direct Energy has over 3 million gas and electricity customers, and over 5 million customer relationships. Direct Energy has a unique business model and extensive experience in providing energy services to residential customers, small and large commercial and industrial (“C&I”) customers, and government entities. The majority of Direct Energy’s customers are residential and mass market (small business) customers. Direct Energy offers retail energy customers many products, including fixed-price and price protection programs.

2. Direct Energy's attorneys in this matter are:

Daniel Clearfield, Esquire
Deanne O'Dell, Esquire
Wolf, Block, Schorr & Solis-Cohen LLP
213 Market Street, 9th Fl.
Harrisburg, PA 17101
(717) 237-7160
dclearfield@wolfblock.com
dodell@wolfblock.com

3. According to its Petition, PPL is seeking enable eligible customers to voluntarily elect to defer a portion of the PPL's January 1, 2010 forecasted rate increase. Most of PPL's residential and Small Commercial and Industrial ("Small C&I") will be eligible to participate. By participating, any increase in electric bills over 25% in 2010 and 2011 will result in the excess increase being deferred for payment. All deferred amounts, plus carrying charges, will be paid in full no later than December 31, 2012. This offering is not available to large commercial and industrial customers. PPL's Petition states that both the deferred amount and the payment of the deferred amount will be non-bypassable and listed separately as a line item on the bills to accommodate customers who already do or want to receive service from an EGS. Amounts will be refunded regardless of whether a customer takes supply from an EGS.

4. The Commission's regulations permit 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. Direct Energy has a direct interest in the outcome of this proceeding and meets the standards for intervention set forth in 52 Pa. Code § 5.72(a). Although Direct Energy

currently serves no customers in PPL's market, Direct Energy is licensed by the Commission to do so and intends to do so if it believes the market structure will support sustained and robust electric competition, especially among residential and small C&I customers. PPL's proposed plan must be implemented in a competitively neutral manner to ensure that the market environment is conducive to Direct Energy's ability to offer competitive service.

6. Because of its unique business model, Direct Energy's interests in this proceeding cannot be adequately represented by other EGS parties with different business models and different customer target markets. Direct Energy's interests are also not adequately represented in this proceeding by a trade association (RESA) to which Direct Energy belongs, and which has also requested to intervene, because RESA's positions represent the consensus of its members and not necessarily the position of any particular member. Accordingly, Direct Energy's interest clearly satisfies the requirements of 52 Pa. Code § 5.72(a)(2).

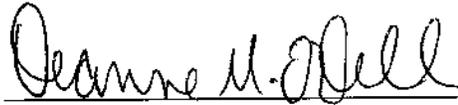
7. In addition, the Commission's regulation provides that a person who has "[a]nother interest of such nature that participation of the petitioner may be in the public interest" may intervene in the proceeding. 52 Pa. Code § 5.72(a)(3). As a member of the Centrica group of companies providing energy and energy related services through over 30 million customer relationships worldwide, Direct Energy has the experience and resources to aid the Commission in carrying out its duties and responsibilities under the Electricity Generation Customer Choice and Competition Act to ensure that the goals of the Act are met. Accordingly, Direct Energy's participation in this proceeding is clearly in the public interest.

8. At this time, Direct Energy continues to evaluate its position on PPL's proposed plan and will refine its position based on further study of the plan, review of discovery and additional input from other parties.

CONCLUSION

WHEREFORE, the Direct Energy Services, LLC respectfully requests that the Commission grant its intervention in this matter.

Respectfully submitted,



Daniel Clearfield, Esquire
Deanne O'Dell, Esquire
Wolf, Block, Schorr & Solis-Cohen LLP
213 Market Street, 9th Fl.
Harrisburg, PA 17101
(717) 237-7160

Date: March 11, 2009

Attorneys for Direct Energy Services, LLC