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March 11, 2009

Via Electronic Filing

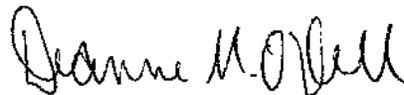
James McNulty
Secretary
PA Public Utility Commission
Commonwealth Keystone Bldg.
2nd Fl., 400 North Street
P.O. Box 3265
Harrisburg, PA 17105-3265

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 Retail Energy Supply Association ("RESA") 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:88562.1/MID051-158776

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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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
Mitigation Plan :

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

Pursuant to 52 Pa. Code §§ 5.72-5.75 and the Pennsylvania Public Utility Commission (“Commission”) notice published on March 7, 2009, in the Pennsylvania Bulletin, 39 Pa.B. 1283, the Retail Energy Supply Association (“RESA”) hereby petitions to intervene in above-captioned proceedings filed by PPL Electric Utilities Corporation (“PPL”). In support of its intervention, RESA states as follows:

INTERVENTION

1. RESA is a non-profit trade association of licensed retail energy marketers who advocate for the development of retail and wholesale competition in electricity markets in regulatory proceedings throughout the Mid-Atlantic, New England and Ohio Valley regions.¹ RESA members are licensed to sell electric energy in the markets of Pennsylvania’s major electric distribution companies (“EDCs”), including PPL’s service territory.

¹ RESA’s members include Commerce Energy, Inc; Consolidated Edison Solutions, Inc; Direct Energy Services, LLC; Gexa Energy; Hess Corporation; Integrys Energy Services, Inc.; Liberty Power Corp.; Reliant Energy Retail Services, LLC; Sempra Energy Solutions; SUEZ Energy Resources NA, Inc. and US Energy Savings Corp. The comments expressed in this filing represent the position of RESA as an organization but may not represent the views of any particular member of RESA.

2. RESA's attorneys in this matter are:

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3. On February 19, 2009, PPL filed the above captioned petition for approval of a rate mitigation plan ("RMP") for its residential and small commercial and industrial ("Small C&I") customers. PPL proposes to enable eligible customers to voluntarily elect to defer a portion of PPL's January 1, 2010 forecasted rate increase. Deferred amounts, plus carrying charges, would be recovered by the end of 2012.

4. By Public Notice dated March 7, 2009 at 39 Pa.B. 1283, the Commission established March 22, 2009 as the deadline to file a Petition to Intervene.

5. Intervention is permitted 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. 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.

6. 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 PPL's service territory, RESA has interests that will be directly affected by this proceeding because the application and mechanics of PPL's plan has the

potential to have a significant impact on the electricity market in Pennsylvania. More specifically, RESA has an interest in ensuring that deferred rate increases are competitively neutral and do not impact the Price to Compare which sets the price for PPL's default service against which RESA members compete. RESA also intervened and ultimately supported the settlement approved by the Commission in PPL's prior petition regarding rate stabilization at Docket No. P-2008-2021776.

7. 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 PPL's service territory in particular. RESA represents the interests of electric generation suppliers in general, and not the interests of any individual member.

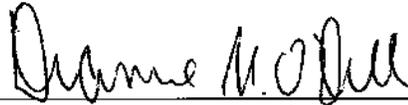
8. RESA's intervention is in the public interest. RESA's participation will enable it to contribute the unique perspectives and insights of a trade association representing multiple EGSs and complete presentation of the issues to be addressed in this proceeding.

9. 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 PPL's filings (and related information), or other issues raised by other parties.

CONCLUSION

WHEREFORE, the Retail Energy Supply Association respectfully requests that the Commission grant its intervention in these matters.

Respectfully submitted,



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Date: March 11, 2009

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