



International Dark-Sky Association

"... To preserve and protect the nighttime environment and our heritage of dark skies"

April 1, 2010

Via Electronic and U.S. Mail

James J. McNulty, Secretary
PA Public Utilities Commission
PO Box 3265
Harrisburg, PA 17105-3265

Re: PECO Energy Company General Base Rate Filing for Electric Operations
Docket No. R-2010-2161575

Dear Secretary McNulty:

Enclosed for filing please find the Petition to Intervene of the International Dark Sky Association ("IDA") along with the electronic filing confirmation with regard to the above referenced matter.

Sincerely,

Leo Smith, IDA Board of Directors
IDA Northeast Regional Director
1060 Mapleton Avenue
Suffield, CT 06078
860 668 4000

C. Stanley Stubbe
IDA Pennsylvania Section Leader
1438 Shaner Drive
Pottstown, PA 19465
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Enclosure

cc: Service List

CERTIFICATE OF SERVICE

I hereby certify that this day I served a copy of the Petition to Intervene of the International Dark Sky Association 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

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Date: April 2, 2010



Leo Smith, Northeast Regional Director

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

PECO Energy Company	:	
General Base Rate Filing	:	Docket No. R-2010-2161575
for Electric Operations	:	

**PETITION TO INTERVENE
OF THE INTERNATIONAL DARK
SKY ASSOCIATION**

Pursuant to 52 Pa Code §§ 5.72 - 5.75, the International Dark Sky Association (IDA) hereby petitions to intervene in the PECO Energy Company's (PECO or the "Company") General Base Rate filing. In support of its intervention, IDA states as follows:

A. INTERVENTION

1. IDA is a non-profit organization and is nationally recognized as a leading authority on outdoor lighting issues. This Petition to Intervene is limited to outdoor lighting matters as follows:

Rate POL (Private Outdoor Lighting)

Rate SL-P (Street Lighting in the City of Philadelphia)

Rate SL-S (Street Lighting in Suburban Counties)

Rate SL-E (Street Lighting - Customer-Owned Facilities)

2. IDA has participated as an Intervenor in electric utility rate cases in other states. In 2007 IDA participated in Connecticut Public Utilities Docket 07-07-01, and again in Docket 09-12-05 resulting in the adoption of an order for the utility company to establish a Midnight Option for streetlights. (See Exhibit A, attached). IDA is currently an Intervenor in Oregon PUC Docket UE-215 in the rate case of Portland General Electric, for street and area lighting.

3. PECO rates for Private Outdoor Lighting as well as streetlighting are offered only for all-night service. Advances in photocell technology allow for programmable photocells to be used, by which streetlights can be turned on at dusk, turned off at 11PM or midnight, then turned on again at 5AM, or other suitable hours as determined by the Company and municipality. The use of programmable photocells for Part Night lighting has been tested and proven to be a stable and reliable technology through which municipalities can conserve energy and reduce expenses for street lighting services.

4. PECO's streetlight rates for Sodium lamps fail to include the 50 watt high pressure sodium. The 50 watt high pressure sodium lamp provides 4,000 rated lumen output, equal to the 100 watt mercury vapor lamp offered in the tariff. By not including the 4,000 lumen, 50 watt high pressure sodium lamp in its streetlight rates, municipalities are required to use 70 watt sodium lamps in instances where 50 watt would have provided sufficient illumination. Other utility companies include the 50 watt high pressure sodium and metal halide lamps in their streetlight schedule.

5. The intent of this Petition to Intervene is to address the need for requiring PECO to develop a new rate for Part Night street and area lighting, and to develop rates for 50 watt high pressure sodium and metal halide lamps as part of rates for private outdoor lighting as well as rates for streetlight services.

6. IDA's representatives in this matter are:

Leo Smith
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6. The Commission's regulations allow intervention when 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.

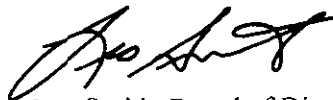
7. IDA meets the standards for intervention set forth in 52 Pa. Code § 5.72(a). As a nonprofit association specializing in outdoor lighting issues and energy conservation issues related thereto, IDA satisfies the standard because IDA possesses a significant "interest which may be directly affected and which is not adequately represented by existing participants".

8. IDA's intervention is in the public interest. Energy wasted by street lighting left on during hours when streetlight may not be needed represents a substantial and unnecessary increase in CO2 emission and unnecessarily higher costs for municipal budgets. The same waste occurs when PECO's rates fail to include 50 watt high pressure sodium and metal halide lamps as part of the Company's offering for street and private area lighting under its rate structure. Accordingly, IDA's participation in this proceeding is clearly in the public interest, meeting the requirements under 52 Pa. Code § 5.72(a)(3).

B. CONCLUSION

WHEREFORE, the International Dark Sky Association respectfully requests that the Commission grant its Petition to Intervene in this matter.

Respectfully submitted,



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Northeast Regional Director
International Dark Sky Association
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EXHIBIT CRG-11
Comparison Duak-to-Dawn vs Midnight Option

The Connecticut Light & Power Company
Docket No. 09-12-05
Witness Responsible: C. R. Goodwin

RATE 117

Dated: January 8, 2010

Rate 117 - Partial Service Streetlighting

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Type/Size	Wattage	Distribution Monthly Rate	Annual kWh		Annual Bill \$				
			Dusk-to-Dawn	Midnight Option	Dusk-to-Dawn	Midnight Option	Difference	Percent Change	
Incandescent									
	59	\$2.21	245	130	\$57.55	\$43.06	-\$14.49	-25.2%	
	104	\$2.96	432	230	\$90.13	\$64.60	-\$25.54	-28.3%	
	203	\$1.83	842	449	\$129.75	\$79.90	-\$49.85	-38.4%	
	328	\$1.71	1,361	725	\$192.78	\$112.23	-\$80.55	-41.8%	
	449	\$2.45	1,863	992	\$265.22	\$154.96	-\$110.26	-41.6%	
	691	\$4.35	2,868	1,527	\$415.18	\$245.49	-\$169.69	-40.9%	
Mercury Vapor									
	118	\$1.09	490	261	\$75.01	\$46.04	-\$28.98	-38.6%	
	206	\$1.67	855	455	\$128.29	\$77.70	-\$50.59	-39.4%	
	287	\$2.46	1,191	634	\$180.27	\$109.79	-\$70.48	-39.1%	
	455	\$3.52	1,888	1,006	\$281.23	\$169.50	-\$111.73	-39.7%	
	1103	\$9.00	4,577	2,438	\$687.44	\$416.58	-\$270.86	-39.4%	
High Pressure Sodium									
	59	\$0.38	245	130	\$35.35	\$20.86	-\$14.49	-41.0%	
	84	\$0.50	349	186	\$50.12	\$29.49	-\$20.63	-41.2%	
	118	\$0.84	490	261	\$72.01	\$43.04	-\$28.98	-40.2%	
	172	\$1.42	714	380	\$107.36	\$65.12	-\$42.24	-39.3%	
	190	\$1.44	789	420	\$117.11	\$70.46	-\$46.66	-39.8%	
	311	\$2.65	1,291	687	\$195.19	\$118.62	-\$76.57	-39.1%	
	472	\$3.46	1,959	1,043	\$289.46	\$173.55	-\$115.91	-40.0%	
	1103	\$9.00	4,577	2,438	\$687.44	\$416.58	-\$270.86	-39.4%	
Metal Halide									
	72	\$0.48	299	159	\$43.54	\$25.86	-\$17.68	-40.6%	
	89	\$0.60	369	197	\$53.96	\$32.11	-\$21.86	-40.5%	
	119	\$0.81	494	263	\$72.18	\$42.96	-\$29.22	-40.5%	
	207	\$1.39	859	457	\$125.48	\$74.63	-\$50.83	-40.5%	
	289	\$1.95	1,199	639	\$175.24	\$104.28	-\$70.97	-40.5%	
	451	\$3.05	1,872	997	\$273.52	\$162.77	-\$110.75	-40.5%	
	1080	\$7.30	4,482	2,387	\$654.93	\$389.71	-\$265.21	-40.5%	
Other Wattage									
	14	\$0.10	58	31	\$8.52	\$5.08	-\$3.44	-40.4%	
	16	\$0.10	66	35	\$9.62	\$5.69	-\$3.93	-40.9%	
	18	\$0.12	75	40	\$10.95	\$6.53	-\$4.42	-40.4%	
	23	\$0.16	95	51	\$14.04	\$8.39	-\$5.65	-40.2%	
	28	\$0.19	116	62	\$17.04	\$10.16	-\$6.88	-40.4%	
	40	\$0.27	166	88	\$24.22	\$14.40	-\$9.82	-40.6%	
	42	\$0.28	174	93	\$25.56	\$15.25	-\$10.31	-40.4%	
	48	\$0.32	199	106	\$29.09	\$17.30	-\$11.79	-40.5%	
	54	\$0.36	224	119	\$32.70	\$19.44	-\$13.26	-40.5%	
	71	\$0.49	295	157	\$43.13	\$25.69	-\$17.44	-40.4%	
	90	\$0.60	374	199	\$54.49	\$32.39	-\$22.10	-40.6%	
	144	\$0.98	598	318	\$87.36	\$52.00	-\$35.36	-40.5%	
	175	\$1.18	726	387	\$106.14	\$63.17	-\$42.97	-40.5%	
	180	\$1.22	747	398	\$109.23	\$65.03	-\$44.20	-40.5%	
	204	\$1.38	847	451	\$123.71	\$73.62	-\$50.10	-40.5%	
	238	\$1.62	988	526	\$144.41	\$85.96	-\$58.44	-40.5%	
	250	\$1.70	1,038	553	\$151.87	\$90.28	-\$61.39	-40.5%	
	289	\$1.95	1,199	639	\$175.24	\$104.28	-\$70.97	-40.5%	
	300	\$2.03	1,245	663	\$181.98	\$108.31	-\$73.67	-40.5%	
	451	\$3.05	1,872	997	\$273.52	\$162.77	-\$110.75	-40.5%	
	480	\$3.24	1,992	1,061	\$291.09	\$173.22	-\$117.87	-40.5%	
	1,520	\$10.28	6,308	3,359	\$921.83	\$548.57	-\$373.26	-40.5%	

ELECTRICITY CRG-11
Comparison Dusk-to-Dawn vs Midnight Option

RATE 116

Dated: January 8, 2010

The Connecticut Light & Power Company
Docket No. 09-12-05
Witness Responsible: C. R. Goodwin

Rate 116 - Full Service Streetlighting

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Type/Size	Wattage	Distribution Monthly Rate	Annual kWh		Annual Bill \$				
			Dusk-to-Dawn	Midnight Option	Dusk-to-Dawn	Midnight Option	Difference	Percent Change	
<u>Incandescent</u>									
600 lumen	59	\$5.58	242	129	\$97.67	\$83.33	-\$14.34	-14.7%	
1,000	104	\$4.65	427	228	\$109.85	\$84.57	-\$25.28	-23.0%	
2,500	203	\$2.52	834	444	\$135.81	\$86.46	-\$49.35	-36.3%	
4,000	328	\$1.98	1348	718	\$194.33	\$114.59	-\$79.74	-41.0%	
6,000	449	\$2.67	1845	982	\$265.59	\$156.43	-\$109.16	-41.1%	
10,000	691	\$4.18	2839	1512	\$409.50	\$241.52	-\$167.99	-41.0%	
<u>Mercury Vapor</u>									
4,000 lumen	118	\$4.77	485	258	\$118.66	\$89.98	-\$28.69	-24.2%	
8,000	206	\$5.16	846	451	\$168.99	\$118.91	-\$50.08	-29.6%	
12,500	287	\$6.34	1179	628	\$225.37	\$155.60	-\$69.77	-31.0%	
22,500	455	\$7.51	1869	995	\$326.70	\$216.08	-\$110.61	-33.9%	
60,000	1,103	\$13.58	4532	2413	\$736.63	\$468.48	-\$268.15	-36.4%	
<u>High Pressure Sodium</u>									
4,000 lumen	59	\$5.59	242	129	\$97.79	\$83.45	-\$14.34	-14.7%	
6,300	84	\$5.55	345	184	\$110.30	\$89.88	-\$20.42	-18.5%	
9,500	118	\$5.89	485	258	\$132.10	\$103.42	-\$28.69	-21.7%	
13,000	190	\$6.28	781	416	\$174.15	\$127.96	-\$46.19	-26.5%	
16,000	172	\$6.29	707	376	\$164.95	\$123.14	-\$41.81	-25.3%	
27,500	311	\$8.00	1278	680	\$257.69	\$182.09	-\$75.61	-29.3%	
50,000	472	\$9.00	1939	1033	\$353.42	\$238.68	-\$114.75	-32.5%	
140,000	1103	\$17.33	4532	2413	\$781.63	\$513.48	-\$268.15	-34.3%	
<u>Metal Halide</u>									
3,450 Lumen	72	\$8.08	296	158	\$134.45	\$116.94	-\$17.50	-13.0%	
5,200	89	\$7.13	366	195	\$131.80	\$110.17	-\$21.64	-16.4%	
8,500	119	\$7.12	489	260	\$147.31	\$118.38	-\$28.93	-19.6%	
14,400	207	\$8.07	850	453	\$204.48	\$154.16	-\$50.32	-24.6%	
22,000	289	\$9.23	1187	632	\$261.09	\$190.83	-\$70.26	-26.9%	
36,000	451	\$10.41	1853	987	\$359.43	\$249.78	-\$109.64	-30.5%	
110,000	1080	\$18.84	4437	2363	\$787.79	\$525.23	-\$262.56	-33.3%	