



**Washington Gas  
Energy Services**  
*A Washington Gas Affiliated Company*

Counsel for WGES  
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May 24, 2010

**ELECTRONIC FILING**


Mr. James J. McNulty  
Secretary  
Pennsylvania Public Utility Commission  
P. O. Box 3265  
Harrisburg, PA 17105-3265

Re: Docket No. R-2010-2161694 Intervention

Dear Mr. McNulty:

Please find enclosed for filing are an original and three (3) copies of a Petition to Intervene of Washington Gas Energy Services, Inc. in the captioned proceeding.

Respectfully submitted,

  
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Telemac N. Chryssikos

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission	*	
	*	
v.	*	Docket No. R-2010-2161694
	*	
Petition of PPL Electric Utilities Corporation	*	

**PETITION TO INTERVENE  
OF WASHINGTON GAS ENERGY SERVICES, INC.**

Pursuant to 52 Pa. Code §§ 5.72 - 5.75, Washington Gas Energy Services, Inc. (“WGES”) hereby files this Petition to Intervene and asks that it be made a party in this proceeding. For support, WGES states as follows:

1. WGES, a Delaware corporation, is a licensed electric generation supplier (“EGS”) in the Commonwealth of Pennsylvania and began operating in the service territory of PPL Electric Utilities Corporation (“PPL”) in January 2010. WGES is also a licensed retail supplier in the District of Columbia, the Commonwealth of Virginia, the State of Delaware and the State of Maryland.

2. On March 31, 2010, PPL made a filing proposing to increase its distribution rates to become effective on June 1, 2010. The Commission has suspended the filing by operation of law until January 1, 2011 and instituted an investigation. Of interest to WGES is that PPL proposes a Purchase of Receivables (“POR”) program to be effective January 1, 2011. WGES understands that PPL had agreed to file a POR

Program to become effective on January 1, 2011 as part of a default service settlement in Docket No. P-2008-2060309, but the Commission directed PPL to implement a POR Program to be effective January 1, 2010, as part of an approved settlement in Docket No. P-2009-2129502, that is currently in effect. WGES understands that issues pertaining to the structure for the PPL 2011 POR program will be addressed and resolved in this proceeding.

3. As a corporation that is a “person” under 52 Pa. Code § 1.8 and a licensed competitive ESG that has just entered the PPL service territory, WGES has an interest in this proceeding that is unique and may be directly affected by binding action of the Commission and that may not be not adequately represented by existing parties. WGES submits that it meets the criteria set forth in 52 Pa. Code § 5.72(a) to qualify as an intervener and that its intervention would be in the public interest with respect to the PPL POR program. Therefore, WGES asks that it be permitted to participate as an intervener.

4. WGES submits that a properly structured POR program will promote retail electricity supply competition in PPL’s service territory if all licensed suppliers have equal access to PPL billing and collection services. WGES has been involved in proceedings in other jurisdictions which have electricity choice programs and has begun to utilize the PPL POR program implemented in 2010. The POR program features that will become effective January 1, 2011 will substantially affect all EGSs who will compete in the PPL market area to serve customers. WGES reserves the right to raise and address other retail competition issues that may be raised by the PPL filing

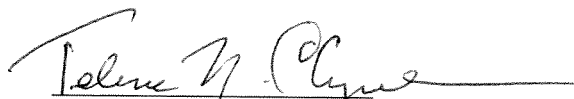
5. In that WGES interests may be affected by the outcome of this proceeding and its interests cannot be adequately represented by any other party, WGES asks that it be added to the service list in this proceeding and that notices and service of pleadings and other documents in the proceeding be provided to the following persons:

Ms. Leah B. Gibbons  
Director, Regulatory & Legislative Affairs  
Washington Gas Energy Services, Inc.  
13865 Sunrise Valley Drive, Suite 200  
Herndon, Virginia 20171-4661  
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WHEREFORE, WGES respectfully requests that the Commission grant this  
Petition to Intervene.

Respectfully Submitted,

  
Telemac N. Chryssikos  
Attorney

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