



Citizens for Pennsylvania's Future
1518 Walnut Street, Suite 1100
Philadelphia, PA 19102-3406
P 215.545.9693
F 215.545.9637
mcphe dran@pennfuture.org
www.pennfuture.org

May 26, 2010

By E-filing

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street
P.O. Box 3265
Harrisburg, PA 17105-3265

Re: Pennsylvania Public Utility Commission v. PECO Energy Co. (Electric)
Docket No. R-2010-2161575

Dear Ms. Chiavetta:

Enclosed for filing in the above-captioned matter please find the Petition to Intervene by Citizens for Pennsylvania's Future, Joy Bergey, Christine Knapp, and Henry Rowan, along with a Certificate of Service.

Sincerely,

s/ Charles McPhedran

Charles McPhedran, Law Staff Chair
PennFuture

Enclosures

cc: Certificate of Service

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Pennsylvania Public Utility Commission	:	
	:	
v.	:	Docket No. R-2010-2161575
	:	
PECO Energy Company -- Electric Division	:	

**PETITION TO INTERVENE BY CITIZENS FOR PENNSYLVANIA'S FUTURE,
JOY BERGEY, CHRISTINE KNAPP, AND HENRY ROWAN**

Pursuant to 52 Pa. Code §§ 5.73-75, Citizens for Pennsylvania's Future (PennFuture), Joy Bergey, Christine Knapp, and Henry Rowan (collectively, Petitioners), by and through undersigned counsel, hereby petition the Pennsylvania Public Utility Commission (Commission) to grant Petitioners, individually and collectively, status as Intervenors in the above-captioned proceedings at Docket No. R-2010-2161575 (the Proceedings). The Commission will consider these matters for compliance with the Pennsylvania Public Utility Code, Title 66 of the Pennsylvania Consolidated Statutes (the Code), and determine, among other things, whether the rates proposed are just and reasonable.

In support of this Petition, Petitioners state as follows:

1. Petitioners are:
 - a. Citizens for Pennsylvania's Future (PennFuture), a Pennsylvania nonprofit corporation with offices in Harrisburg, Philadelphia, West Chester, Pittsburgh, and Wilkes-Barre (www.pennfuture.org). PennFuture's principal business location is 610 North Third Street, Harrisburg, PA 17101, tel. (717) 214-7920. PennFuture has members who live in the PECO service territory, are customers of PECO, and receive electric service from PECO. PennFuture engages in policy development, public education, litigation and other strategies to achieve its goals, including promoting clean and renewable sources of energy.

b. Joy Bergey, who resides at 100 South College Avenue, Flourtown, PA, 19031, where she is a customer receiving distribution service from PECO.

c. Christine Knapp, who resides at 728 Earp Street, Philadelphia, PA 19147, where she is a customer receiving distribution service from PECO.

d. Henry Rowan, who resides at 3962 Regina Place, Doylestown, PA 18902, where he is a customer receiving distribution service from PECO.

2. The contact information for counsel for Petitioners is:

Charles McPhedran, Law Staff Chair
John Baillie, Senior Attorney
PennFuture
1518 Walnut Street, Suite 1100
Philadelphia, PA 19102
Phone: 215-545-9693
Fax: 215-545-9637
mcphedran@pennfuture.org
baillie@pennfuture.org

3. Each individual Petitioner depends on electric distribution service from PECO to meet basic necessities of life and risks health and financial consequences if service is not provided in a safe, reliable, clean, and affordable manner. Each individual Petitioner is directly and personally affected by the Proceedings because they reasonably may be expected to affect the safety, reliability, cleanliness and affordability of their public utility service.

4. As ratepayers and members of the public, each Petitioner has a right and interest in assuring that safe, reliable, clean and affordable public utility service, and participation in these Proceedings is an appropriate way to protect these rights and interests.

5. To the extent these Proceedings will result in higher rates for customers, Petitioners seek to mitigate the adverse economic impact of these rates by promoting energy efficiency, diversifying energy sources, and reducing demand.

6. Petitioners have interests in and perspectives on issues in this proceeding that are not adequately represented by other parties of record.

7. Petitioners intend to review and analyze filings, and present testimony regarding whether the rates proposed are just and reasonable and whether these rates provide for safe, reliable, clean, and/or affordable utility service. Issues include, but are not limited to, whether the rates under consideration in the Proceedings provide for cleaner and renewable energy, conservation, and energy efficiency.

8. Petitioners reserve the right to raise other and more specific issues as necessary and appropriate during the course of the proceeding and to respond to issues raised by other parties.

9. This Petition is filed sufficiently in advance of the Prehearing Conference scheduled for June 9, 2010 in this matter to afford adequate notice to other participants and will not unfairly prejudice them.

For the foregoing reasons, Petitioners request that the Commission grant them status as Intervenors in these Proceedings.

Respectfully submitted,

5/26/10

s/ Charles McPhedran

Date

Charles McPhedran, Law Staff Chair
Pa. Bar Id. No. 60123
PennFuture
1518 Walnut Street, Suite 1100
Philadelphia, PA 19102
Phone: 215-545-9693
Fax: 215-545-9637
mcphedran@pennfuture.org

Counsel for Petitioners PennFuture, Joy Bergey, Christine Knapp, and Henry Rowan

VERIFICATION

I, Courtney Lane, am a Policy Analyst for the Center for Energy, Enterprise, and the Environment at Citizens for Pennsylvania's Future. I am authorized to make this verification on behalf of Petitioner Citizens for Pennsylvania's Future. I hereby state that the facts above set forth are true and correct (or are true and correct to the best of my knowledge, information and belief) and that I expect to be able to prove the same at a hearing held in this matter. I have registered to use the Public Utility Commission's electronic filing system in accordance with the registration instructions available on the Commission's website and have obtained a user ID and password. I understand that the statements made herein are subject to the penalties of 18 Pa.C.S. Section 4907 (relating to unsworn falsification to authorities).

5/26/10

Date

s/ Courtney Lane

Courtney Lane, Policy Analyst
PennFuture

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

PENNSYLVANIA PUBLIC UTILITY
COMMISSION

v.

PECO ENERGY COMPANY -
ELECTRIC DIVISION

DOCKET NO. R-2010-2161575

CERTIFICATE OF SERVICE

I hereby certify and affirm that the foregoing document was filed electronically on the Commission's electronic filing system, and that I have this day served a copy of the foregoing document on the following persons in the matter specified in accordance with the requirements of 52 Pa. Code § 1.54:

By Electronic Mail and First-Class Mail

Hon. Marlene R. Chestnut
Administrative Law Judge
Pennsylvania Public Utility Commission
801 Market Street, Suite 4063
Philadelphia, PA 19107
machestnut@state.pa.us
kniesborella@state.pa.us

Hon. Christopher Pell
Administrative Law Judge
Pennsylvania Public Utility Commission
801 Market Street, Suite 4063
Philadelphia, PA 19107
cpell@state.pa.us

Tanya J. McCloskey, Esquire
Candis A. Tunilo, Esquire
Office of Consumer Advocate
Forum Place, 5th Floor
555 Walnut Street
Harrisburg, PA 17101-1923
TMcCloskey@paoca.org
CTunilo@paoca.org

Johnnie E. Simms, Esquire
Adeolu A. Bakare, Esquire
Pennsylvania Public Utility Commission
Office of Trial Staff
P.O. Box 3265
Harrisburg, PA 17105-3265
josimms@state.pa.us
abakare@state.pa.us

William R. Lloyd, Esquire
Sharon Webb, Esquire
Office of Small Business Advocate
Commerce Building, Suite 1102
300 North Second Street
Harrisburg, PA 17101
willlloyd@state.pa.us
swebb@state.pa.us

Charis Mincavage, Esquire
Barry A. Naum, Esquire
C. J. Zwick, Esquire
McNees Wallace & Nurick LLC
P.O. Box 1166
100 Pine Street
Harrisburg, PA 17108-1166
cmincavage@mwn.com
bnaum@mwn.com
czwick@mwn.com

Harry S. Geller, Esquire
John G. Gerhard, Esquire
Pennsylvania Utility Law Project
118 Locust Street
Harrisburg, PA 17 101-1414
hgellerpulp@palegalaid.net
jgerhardpulp@palegalaid.net

Leo Smith, Northeast Regional Director
International Dark Sky Association
1060 Mapleton Avenue
Suffield, CT 06078
leo@smith.net

Charles T. Joyce, Esquire
Spear Wilderman, P.C.
230 South Broad Street, Suite 1400
Philadelphia, PA 19102
Ctjoyce@spearwilderman.com

Gary A. Jeffries, Esquire
Dominion Retail, Inc.
501 Martindale Street, Suite 400
Pittsburgh, PA 15212-5817
Gary.A.Jeffries@dorn.com

Richard N. Lipow, Esquire
629 Swedesford Road
Malvern, PA 19355
Richard@lipowlaw.com

J. Barry Davis, Esquire
Scott J. Schwarz, Esquire
City of Philadelphia Law Department
One Parkway Building, 16th Floor
1515 Arch Street
Philadelphia, PA 19102-1595
barry.davis@phila.gov
scott.schwarz@phila.gov

Thu B. Tran, Esquire
Philip A. Bertocci, Esquire
Jonathan M. Stein, Esquire
George D. Gould, Esquire
Community Legal Services of Philadelphia
1424 Chestnut Street
Philadelphia, PA 19 102-2505
ttran@clsphila.org
pbertocci@clsphila.org

C. Stanley Stubbe, Pa. Section Leader
International Dark Sky Association
1438 Shaner Drive
Pottstown, PA 19465
csstubbe@cs.com

Todd S. Stewart, Esquire
Hawke McKeon & Sniscak LLP
100 North Tenth Street
Harrisburg, PA 17101
tsstewart@hmslegal.com

Anthony E. Gay, Esquire
Jack R. Garfinkle, Esquire
PECO Energy Company
2301 Market Street S23-1
Philadelphia, PA 19103
jack.garfinkle@exeloncorp.com

Thomas P. Gadsden, Esq.
Anthony C. DeCusatis, Esq.
Catherine G. Vasudevan, Esq.
Morgan, Lewis & Bockius LLP
1701 Market Street
Philadelphia, PA 19103-2921
tgadsden@morganlewis.com
adecusatis@morganlewis.com
cvasudevan@morganlewis.com

By First Class Mail

Ryan Miller
9912 Medway Road
Philadelphia, PA 19115

Craig Vorwald
600 Exmoor Drive
Collegeville, PA 19426

Edward W. Leisenring
2575 White Horse Road
Berwyn, PA 19312

Respectfully submitted,

s/ Charles McPhedran

Charles McPhedran, Law Staff Chair
John Baillie, Senior Attorney
Citizens for Pennsylvania's Future
(PennFuture)
1518 Walnut Street
Philadelphia, PA 19102
mcphedran@pennfuture.org
baillie@pennfuture.org
(215) 545-9693 (phone)
(215) 545-9637 (fax)

Date: May 26, 2010