

**By Filing by First Class Mail**

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 of Stanley Stubbe, along with a Certificate of Service.

Respectfully submitted,

*C. Stanley Stubbe*

Stanley Stubbe  
1438 Shaner Drive  
Pottstown, Pennsylvania 19465  
610-326-1402  
csstubbe@cs.com  
cc: Certificate of Service

Date: July 14, 2010

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BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

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PA P.U.C. SECRETARY'S OFFICE  
PECO Energy Company :  
General Base Rate Filing :  
for Electric Operations :

Docket No. R-2010-216575  
2161575

**PETITION TO INTERVENE**

Comes now before the Commission Stanley Stubbe (hereinafter referred to as the Applicant), who, by this Petition, seeks to join as a party and intervenor in the above referenced proceeding.

The Applicant is president of the Pennsylvania Outdoor Lighting Council(POLC), and has unique and particular knowledge regarding outdoor lighting issues. The Applicant resides within the PECO service area and is directly affected. The Applicant, if granted this Motion, will be acting pro se, in his capacity as an individual.

The Applicant intends to use Leo Smith of 1060 Mapleton Avenue, Suffield, CT 06078 as the expert witness regarding the streetlight rates. Mr. Smith is the Northeast Regional Director of the International Dark Sky Association, and has unique and particular knowledge regarding streetlight rates. Mr. Smith has testified in utility rate case proceedings in Connecticut, Oregon and Kansas.

The issue of providing rates for streetlights that turn off at midnight is one of serious public interest, from both a cost savings and energy conservation perspective. Without rates in place for midnight option streetlights, Municipalities have no incentive to conserve energy where streetlights are unnecessary after midnight.

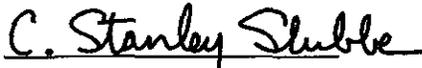
The Applicant is currently on the Service List in the above-referenced proceedings in connection with the International Dark Sky Association. The Applicant respectfully requests that he be granted this Petition to Intervene as an individual.

## **Conclusion**

The Applicant will address an issue of significant public interest unlikely to be raised by any other party to these proceedings. The Applicant's expert witness has a demonstrated and unique knowledge in certain aspects of streetlight rates. Establishing a Midnight Option rate for streetlights has significant public interest.

WHEREFORE, the Applicant respectfully requests that this Petition to Intervene be granted.

Respectfully submitted,



Stanley Stubbe  
1438 Shaner Drive  
Pottstown, Pennsylvania 19465  
610-326-1402  
csstubbe@cs.com

Date: July 14, 2010

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

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2161575  
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**CERTIFICATION OF SERVICE**

I hereby certify that I have this day served a true copy of the foregoing Petition to Intervene on the following persons in the matter specified in accordance with 52 Pa. Code §1.54:

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Respectfully submitted,

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