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May 25, 2010

VIA HAND DELIVERY

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17120

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SECRETARY'S BUREAU

C-2010-2178216

RE: Joint Petition of Metropolitan Edison Company and Pennsylvania Electric Company for Approval of their Default Service Program; Docket Nos. P-2009-2093053 and P-2009-2093054; The Retail Energy Supply Association v. Metropolitan Edison Company and Pennsylvania Electric Company; Docket No. C-2010-_____ and C-2010-_____; **PETITION TO INTERVENE OF DOMINION RETAIL, INC.**

Dear Secretary Chiavetta:

Enclosed for filing with the Commission are the original and three (3) copies of a Petition to Intervene of Dominion Retail, Inc., in the above-captioned matter.

If you have any questions, please do not hesitate to contact me.

Very truly yours,


Todd S. Stewart
Counsel for Dominion Retail, Inc.

TSS/bks
Enclosures
cc: Per Certificate of Service

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

SECRETARY'S OFFICE
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Joint Petition of Metropolitan Edison Company :
and Pennsylvania Electric Company for : Docket Nos. P-2009-2093053
Approval of their Default Service Program : P-2009-2093054

The Retail Energy Supply Association :
:
v. : Docket No. C-2010-_____
:
:
Metropolitan Edison Company and :
Pennsylvania Electric Company :

**PETITION TO INTERVENE OF
DOMINION RETAIL, INC.,**

AND NOW, comes Dominion Retail, Inc., (“Dominion Retail”) by and through its counsel, Hawke McKeon & Sniscak, LLP, and hereby Petitions to Intervene in the above-captioned matter pursuant to 52 Pa. Code § 5.71, *et seq.* In support of its Petition, Dominion Retail states and avers as follows:

1. On March 31, 2010, Metropolitan Edison Company (“Met-Ed”) and Pennsylvania Electric Company (“Penelec” collectively “the Companies”) filed revised electric generation supplier coordination tariffs (“Supplier Tariffs”) with the Pennsylvania Public Utility Commission with proposed effective dates of January 1, 2011.

2. The Supplier Tariffs purport to be filed “in compliance with” the settlement of Met-Ed and Penelec’s recent default service plans which were approved by the Commission at the same dockets.

3. On or about May 21, 2010, the Retail Energy Supply Association (“RESA”) filed a Complaint against both Companies’ tariff filings alleging, among other things, that the tariffs were purported to be compliance filings but have instead proposed additional modifications that were not litigated as part of the default service case and, therefore, did not fall under the aegis of a compliance filing. Moreover, the Complaint raised several specific allegations, including: 1) that the proposed tariff modifications seek to impose charges upon suppliers for customers interval data; 2) that the changes may create a sixteen day rescission period; and 3) that the changes may make it more difficult and more costly for suppliers to obtain customer usage information.

4. Dominion Retail is represented in this matter by the following counsel:

Todd S. Stewart, Attorney I.D. No. 75556
Hawke McKeon & Sniscak LLP
P.O. Box 1778
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5. Dominion Retail is a licensed electric generation supplier throughout the Commonwealth of Pennsylvania and actively participated in the recent litigation of Met-Ed and Penelec’s default service plans, and is a signatory to the settlement which resolved those matters.

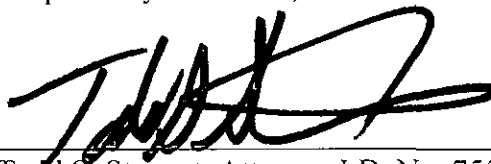
6. Dominion Retail believes that RESA’s Complaint raises legitimate concerns about the tariff supplements filed by Met-Ed and Penelec and that its participation in this proceeding is vital to protect its interest as an EGS that intends to provide service to customers in the Met-Ed and Penelec service territories. Dominion Retail currently serves over 300,000 retail electricity customers in Pennsylvania, and its interests cannot be adequately represented by

another party. Moreover, as a supplier licensed to provide service in the Met-Ed/Penelec service territories it will be bound by any action with the Commission in this proceeding.

7. Dominion Retail has established that it has a unique interest in this matter, that it cannot adequately be represented by another party, and it will be bound by the outcome of this proceeding. Therefore, it has satisfied the requirements of the Commission regulations at 52 Pa. Code § 5.72(a).

WHEREFORE, Dominion Retail respectfully requests that its Petitions to Intervene in the above-captioned matters be granted and that it be allowed full party status in these matters. .

Respectfully submitted,



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Counsel for Dominion Retail, Inc.,

Dated: May 25, 2010

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the foregoing document upon the parties, listed below, in the manner indicated below, and in accordance with the requirements of 52 P.A. Code §1.54 (relating to service by a party).

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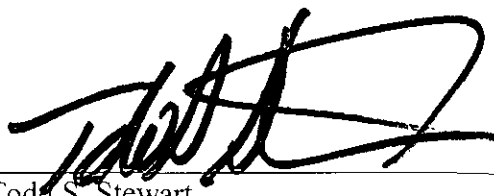
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A handwritten signature in black ink, appearing to read 'Todd S. Stewart', is written over a horizontal line.

Todd S. Stewart

Dated this 25th day of May 2010