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November 17, 2010

**RECEIVED**

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**Via Overnight Mail**

Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street, 2<sup>nd</sup> Floor  
Harrisburg, PA 17120

PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

**Re: Petition of PECO Energy Company for Approval to Procure Tier II Alternative Energy Credits and Additional Tier I and Solar Alternative Energy Credits Docket No. P-2010-**

Dear Secretary Chiavetta:

Enclosed for filing are the original and eight (8) copies of the Petition of PECO Energy Company for Approval to Procure Tier II Alternative Energy Credits and Additional Tier I and Solar Alternative Energy Credits in the above-captioned docket.

Kindly return a time-stamped copy of this cover letter in the self-addressed stamped enveloped that is enclosed. Please do not hesitate to contact me at 215-841-5974 should you have any questions regarding this filing.

Very truly yours,



Jeanne J. Dworetzky  
Assistant General Counsel

Enclosures

cc: All Parties to PECO's Default Service Proceeding, Docket No. P-2008-2062739, as Set Forth on the Attached Service List

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PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

PETITION OF PECO ENERGY :  
COMPANY FOR APPROVAL TO : DOCKET NO. P-2010-  
PROCURE TIER II ALTERNATIVE :  
ENERGY CREDITS AND :  
ADDITIONAL TIER I AND SOLAR :  
ALTERNATIVE ENERGY CREDITS :

PETITION

PECO Energy Company (“PECO” or the “Company”), pursuant to the Alternative Energy Portfolio Standards Act of 2004, 73 P.S. § 1648.1 *et seq.* (“AEPS Act” or the “Act”) and in accordance with the order of the Pennsylvania Public Utility Commission (the “Commission” approving its default service program for the period January 1, 2011 through May 31, 2013 (“Default Service Program”),<sup>1</sup> hereby petitions the Commission to approve (1) an annual procurement of supplemental alternative energy credits (“Supplemental AECs”) to meet AEPS requirements for the portion of PECO’s residential load served by PECO through block energy contracts (the “PECO Share”) and to replace any AECs not delivered through PECO’s previously approved full requirements default service and AEC procurements; (2) an initial procurement of Tier II AECs to satisfy PECO’s anticipated Tier II AEPS requirements for the PECO Share for AEPS Reporting Years 2010-2011 and 2011-2012 and for the portion of PECO’s industrial customer default service load that PECO will be serving on a contingency basis during AEPS Reporting Year 2010-2011; (3) a second procurement to satisfy PECO’s anticipated Tier II AEPS requirements for the PECO Share for AEPS Reporting Year 2012-2013; and (4) the purchase of additional AECs PECO may require for AEPS compliance and the

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<sup>1</sup> See *Petition of PECO Energy Company for Approval of its Default Service Program and Rate Mitigation Plan*, Docket No. P-2008-2062739 (Order entered June 2, 2009) (“*Default Service Order*”).

sale of excess AECs PECO may possess through independent third-party auctions and brokers experienced in the purchase and sale of AECs.

Specifically, PECO requests the Commission to approve PECO's Request for Proposals ("RFP") processes and form AEC Purchase and Sale Agreement (the "AEC Agreement") attached hereto for annual AEC procurements and to authorize PECO to procure (or sell excess) AECs through independent third-party auctions or brokers experienced in the purchase and sale of AECs. PECO further seeks approval of the recovery of all of PECO's costs associated with each procurement related to and in compliance with the processes as approved by the Commission. All costs and proceeds (including losses, if any) from any AEC purchases or sales associated with the PECO Share will be credited to residential default service customers. Any other costs and proceeds (including losses, if any) associated with the purchase or sale of AECs associated with AEPS requirements for residential, commercial or industrial default service will be credited to the applicable default service procurement class consistent with PECO's existing default service and AEPS tariff provisions and the *Default Service Order*.

In support of this Petition, PECO states as follows:

## **I. BACKGROUND**

1. PECO is a corporation organized and existing under the laws of the Commonwealth of Pennsylvania, with its principal corporate office in Philadelphia, Pennsylvania. PECO provides electric delivery service to approximately 1.6 million customers and natural gas delivery service to approximately 475,000 customers in Southeast Pennsylvania.
2. On November 30, 2004, Governor Edward G. Rendell signed the AEPS Act into law. As of its effective date on February 28, 2005, an alternative energy portfolio standard was

established in Pennsylvania. The AEPS Act requires a certain increasing percentage of electricity sold to retail customers in Pennsylvania by electric distribution companies (“EDCs”) and electric generation suppliers (“EGSs”) to be derived from alternative energy sources as defined in the Act. An EDC’s compliance with this requirement is measured using AECs. An alternative energy credit is equal to one-megawatt hour of qualified alternative energy generation, and may be purchased, traded and owned separately from the underlying energy that generates the credit. *See generally*, 73 P.S. § 1648.3.

3. The AEPS Act has several components, including (1) a timetable and associated yearly percentage requirements which EDCs and EGSs must satisfy, as well as an exemption period (the “Cost Recovery Period”) linked to an EDC’s transition (or stranded cost recovery) period established under the Electricity Generation Customer Choice and Competition Act, 66 Pa. C.S. § 2801 *et seq.* (the “Competition Act”); (2) provisions under which EDCs may “bank” AECs for future compliance; and (3) a provision which allows EDCs to fully recover all AEPS-related costs for generation from alternative energy sources and/or AECs from their retail customers pursuant to a Section 1307 surcharge.

4. On July 17, 2007, Governor Rendell signed into law several amendments to the AEPS Act (*see* 2007, July 17, P.L. 114, No. 35), and on September 25, 2008, the Commission issued final regulations implementing the AEPS Act. *See* 52 Pa. Code §§ 75.61-75.70 (“*AEPS Regulations*”). On October 15, 2008, Governor Rendell signed Act 129 (2008 Pa. Legis. Serv. 819) into law. Among other provisions, Act 129 amended the Competition Act to require EDCs (as default service suppliers, after the end of their Cost-Recovery Periods) to procure AECs through competitive processes and a “prudent mix” of contracts. *See* 66 Pa. C.S. § 2807(e)(3.5).

5. Under the AEPS Act as amended, for retail default service generation sales between January 1, 2011 and May 31, 2011, PECO will be required to procure AECs from Tier I resources (e.g., wind, geothermal, biomass) equal to three percent (3%) of the electricity sold by PECO to retail customers in Pennsylvania, including an amount of AECs from solar photovoltaic (“solar PV”) systems equal to .0203% of PECO’s retail sales, as well as AECs from Tier II resources equal to 6.2% of the electricity sold by PECO to retail customers in Pennsylvania. These percentage requirements increase annually until 2020, with the Tier I requirement increasing to 8%, the solar PV requirement, as a subset of the Tier I requirement, increasing to 0.5% and the Tier II requirement increasing to 10%.

6. On March 15, 2007, PECO submitted a Petition<sup>2</sup> for approval to voluntarily procure up to 450,000 non-solar Tier I AECs for future AEPS compliance and to recover the costs of that procurement and future AEC procurements pursuant to a Section 1307 surcharge. On December 26, 2007, the Commission entered an order in *PECO AEPS I*, approving PECO’s petition with certain modifications. Subsequently, in March 2008 and January 2009, PECO conducted two procurements in compliance with the Commission’s December 26, 2007 Order. The Commission approved the results of those procurements, and PECO entered into several contracts for a total annual delivery of 452,000 non-solar Tier I AECs. The AECs obtained through these procurements are being “banked” in accordance with the AEPS Act for application towards PECO’s future AEPS requirements.

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<sup>2</sup> See *Petition of PECO Energy Company for Approval of (1) A Process to Procure Alternative Energy Credits During the AEPS banking Period and (2) A Section 1307 Surcharge and Tariff to Recover AEPS Credits*, Docket No. P-00072260 (Order entered December 26, 2007) (“*PECO AEPS I*”).

7. On March 3, 2009, PECO filed a Petition<sup>3</sup> seeking approval to procure 8,000 solar photovoltaic AECs (“SAECs”) annually over ten years to satisfy a portion of PECO’s solar requirements under the Act. PECO also sought to recover the costs of that procurement pursuant to the Section 1307 surcharge approved in *PECO AEPS I*. On August 28, 2009, the Commission entered an Order in *PECO AEPS II* unanimously approving PECO’s Petition with certain modifications. PECO conducted its first SAEC procurement during the fall and winter of 2009-2010 and entered into several ten-year contracts, after Commission approval, to procure 8,000 SAECs annually. SAECs received prior to December 31, 2010, will also be banked in accordance with the AEPS Act for application towards PECO’s future solar AEPS requirements.

8. PECO has filed this Petition in accordance with the comprehensive settlement (the “Settlement”) approved by the Commission in the *Default Service Order*. As provided in the Settlement, twenty-five percent (25%) of PECO’s residential load – the PECO Share – will be served through forward block energy contracts procured by PECO and balanced through the spot energy markets administered by PJM Interconnection, L.L.C. See Settlement, ¶ 18. The settlement included a specific provision addressing AEPS procurements relating to the PECO Share and generally:

With respect to the PECO Share, PECO will satisfy the associated AEPS obligations by applying AECs from its residential customers’ share of AECs from PECO’s separate AEC procurements and competitively procuring any additional AECs required to meet the PECO Share’s AEPS requirements. PECO will submit a separate petition to the Commission for approval of its procedures for such separate AEC procurements. Such separate procedures will also address purchases and sales of AECs should a full requirements service supplier fail to deliver AECs or should a

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<sup>3</sup> *Petition of PECO Energy Company for Approval to Procure Solar Alternative Energy Credits*, Docket No. P-2009-2094494 (Order entered August 28, 2009) (“*PECO AEPS II*”).

situation arise in the future whereby PECO has excess AEC inventory and is unable to apply the inventory to default service obligations before the inventory would expire.

Settlement, ¶ 43.

9. This Petition describes PECO's proposed RFP processes and AEC agreement in compliance with the Settlement and the *Default Service Order* for the procurement of Supplemental AECs to serve the PECO Share, and highlights the specific differences from the process most recently approved by the Commission in *PECO AEPS II* for procurement of solar photovoltaic AECs. This Petition includes the following exhibits, which are attached hereto and incorporated herein by reference:

Exhibit 1 -- Supplemental AEC RFP (including the AEC Agreement)

Exhibit 2 -- Comparison of Exhibit 1 to PECO Solar AEC RFP and Solar AEC Agreement in *PECO AEPS II*

10. In addition, this Petition describes PECO's proposal for the purchase of additional AECs PECO may require for AEPS compliance and sale of excess AECs PECO may possess through independent third-party auctions and brokers experienced in the purchase and sale of AECs.

## **II. PECO'S AEC REQUEST FOR PROPOSALS AND AEC AGREEMENT**

11. Similar to *PECO AEPS I* and *PECO AEPS II*, the proposed RFP process is designed to obtain competitive, fixed-price supply contracts for AECs and PECO will enter into standardized AEC Agreements with successful bidders under which PECO will purchase Supplemental AECs to satisfy the Company's AEPS obligations.

12. As in the previous procurements, the RFP includes a two-stage, competitive bid process in which bidders are first qualified and then permitted to submit a bid price (in \$/AEC)

and a specified amount of AECs for delivery. Consistent with the competitive procurement process requirements under the Act 129 and the *AEPS Regulations* (52 Pa. Code § 75.67), this bidding procedure permits PECO to select among equally qualified, competitive bidders solely on the basis of lowest price. The RFP also provides for an independent, third-party RFP monitor to participate throughout the RFP process, ensure compliance with the RFP rules, and confirm that PECO's affiliate, Exelon Generation, does not receive an advantage in the RFP process. In addition, the RFP will establish minimum bid quantity levels that are sufficiently large as determined by PECO to encourage bidder participation, and no less than 10% of the total quantity supply sought in the RFP.

13. The proposed procedures also retain the requirement of the preparation of a *benchmarking report by the RFP Monitor (based upon market quotes from independent brokers for the types and quantities of AECs to be procured)* as well as a minimum participation level of three unaffiliated bidders for each type of AEC sought. The benchmarking report will be circulated to the Office of Consumer Advocate, the Office of Small Business Advocate, and the Office of Trial Staff for review and comment prior to PECO's submission of the bid results to the Commission for approval. Any comments received will be included in the RFP Monitor's report.

14. The Commission will have ten days for review and approval of the final RFP results, as it does in *PECO AEPS II* procurements, and PECO will not enter into any agreement unless and until it receives approval by the Commission. Upon completion of an RFP, PECO will release the following information, by AEC type, no later than ten days after all agreements are executed: (1) the number of bidders; (2) the number of winning bidders; (3) the average weighted price of the winning bids; and (4) total AECs procured. A list of names of winning

bidders will be released (in alphabetical order) if there are three or more winning bidders. The quantity won by each bidder will not be released.

15. Upon approval of this Petition, PECO will promptly conduct its first Supplemental AEC procurement, with the goal of executing agreements within ninety (90) days thereafter. The first supplemental procurement will seek only Tier II AECs for the PECO Share and for the portion of PECO's large commercial and industrial customer default service load PECO will serve on a contingency basis.<sup>4</sup> This is because PECO anticipates having sufficient Tier I non-solar AECs and SAECs as a result of its earlier procurements to satisfy Tier I requirements for the PECO Share for AEPS Reporting Year 2010-2011 and for the PECO-served portion of its large commercial and industrial customer default service load. PECO proposes to combine its anticipated PECO Share Tier II AEPS obligations for both Reporting Years 2010-2011 and 2011-2012 and its requirements for industrial customer default service load to procure up to 340,000 Tier II AECs. Procuring AECs for the combined partial (i.e., five-month) and full reporting years will enhance bidder interest in a greater opportunity and reduce administrative costs that would be incurred in conducting a procurement for each reporting year.

16. PECO will conduct a second Tier II procurement in late 2011 for the 2012-2013 Reporting Year for sufficient Tier II AECs to meet anticipated PECO Share Tier II requirements

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<sup>4</sup> Under the Joint Petition for Settlement approved in the *Default Service Order*, PECO is required to assume responsibility for any default service supply tranches that are not filled in a procurement and to acquire supply to fill those tranches through PJM-administered markets until the tranches can be rebid. See Joint Petition for Settlement, *Petition of PECO Energy Company for Expedited Approval of its Default Service Program and Rate Mitigation Plan*, Docket No. P-2008-2062739, Ex. C, ¶ 1.2.11. On September 22, 2010, the Commission issued a Secretarial Letter noting that seven tranches of supply for PECO's default service industrial load were unfilled in a procurement and also rejecting the bids for five additional tranches, leaving a total of twelve unfilled tranches for which PECO must procure default service supply and satisfy associated AEPS requirements. See Letter of Secretary Rosemary A. Chiavetta to Brian Crowe, Docket No. P-2008-2062739 (September 22, 2010).

in light of the extent of residential shopping. PECO estimates that 212,000 Tier II AECs will be required, but will revise this estimate prior to the procurement to reflect shopping levels in late 2011.

17. Unlike the procurements under *PECO AEPS I* and *PECO AEPS II*, PECO is not seeking long-term contracts with bidders in Supplemental AEC procurements. Instead, PECO will solicit bids for contracts to deliver AECs to PECO within thirty days of contract execution. PECO believes this shorter contract term is appropriate for its planned initial procurement of Tier II AECs since such AECs are readily available from existing Tier II resources. To the extent procurements for Supplemental AECs are necessary in future years for the PECO Share, any default service contingency procurements, or the failure of any full requirements default service or AEC supplier to deliver AECs, a shorter contract term is also appropriate since the quantity of AECs required will likely be small and a short delivery timeframe will help ensure compliance with the Act.

18. Consistent with the short-term nature of the delivery contracts being sought, PECO is proposing several changes to its RFP rules and AEC Agreement. PECO believes the changes will particularly benefit bidders by eliminating requirements to provide AECs from a specific facility and will also benefit customers by lowering administrative costs. Key revisions made in light of the short-term nature of the procurements include:

- a. **Elimination of Facility Development Requirements.** PECO determined that provisions related to the development of specific facilities that generate electricity associated with the AECs delivered to PECO are not necessary for these limited AEC-only procurements.
- b. **Elimination of Credit and Collateral Requirements.** PECO removed the credit and collateral provisions required in the earlier Commission-approved agreements, which involved continuing obligations of five and ten years in length.
- c. **Elimination of Dispute Resolution Provisions.** PECO has determined that the default remedies provided in the AEC Agreement are sufficient given the limited nature of these contracts and therefore additional dispute resolution provisions are not necessary.

19. PECO will update the RFP before each solicitation as necessary to reflect the supply sought in that particular solicitation, any changes in exhibits, additional decisions by the PA PUC, or non-material modifications to the processing of proposals expected to improve potential participation by suppliers.

### **III. ADDITIONAL PURCHASES AND SALES OF AECs**

20. Consistent with the Settlement, PECO also requests approval to purchase additional AECs necessary for AEPS compliance and to sell any excess AECs it may obtain through the Supplemental AEC procurements or its existing AEC contracts to the extent it projects that it will be unable to apply those AECs to AEPS obligations before the AECs would expire.

21. The necessity of additional purchases separate from the annual RFP procurement may arise to the extent that a Supplemental AEC procurement does not obtain sufficient AECs for AEPS compliance, or PECO's additional requirements are so minimal that an entire RFP process would not be cost-effective for default service customers. In those circumstances, PECO

will seek to procure AECs through established independent third-party auction platforms (e.g., PJM Envirotrade) or through independent third-party brokers experienced in the purchase and sale of AECs.

22. PECO will establish price thresholds for engaging in such transactions based on publicly available price benchmarks. PECO will not exceed these thresholds by more than 10% in any auction process or broker transaction. If brokers are used, PECO will seek bids from at least three brokers to ensure that it is able to purchase AECs at a competitive price. PECO will require that any participating broker also ensure and certify that all bids offered are from different, independent parties. For bids at or above \$10,000, PECO will also require participating brokers to ensure and certify that the bids are from parties who are not affiliates of PECO.

23. The necessity of AEC sales may arise because the actual load of the PECO Share could decrease for a variety of reasons (including increased customer shopping or reduced default service customer electricity demand), and thereby significantly reduce PECO's need for AECs. Any such sales will also be conducted through independent third-party auction platforms or brokers experienced in the purchase and sale of AECs (with at least three independent offers considered and without any sales to PECO affiliates if bids are at or above \$10,000, as with AEC purchases).

24. Given the limited number of AECs that will be procured (or sold) through independent third-party auctions or brokers, PECO does not propose to submit prices for approval to the Commission before participating in such auctions or conducting such purchases or sales. However, PECO will not procure more than 10% of the projected Reporting Year requirements of Supplemental AECs through auctions or brokers in any AEPS Reporting Year

unless less than 30 days remain between the time PECO becomes aware of an AEC shortfall and the last day of that AEPS Reporting Year (i.e., May 31). PECO will provide the Commission with the available price benchmarks, summary of the procurement process, and results of any purchases or sales conducted through third-party entities within 10 days of the completion of any such purchases or sales. PECO will also post the transaction date and final prices and quantities on PECO's AEPS website, [www.peco.com/AEPS](http://www.peco.com/AEPS).

#### IV. COST RECOVERY

25. The AEPS Act provides that all direct and indirect costs for alternative energy and/or AECs purchased by an EDC for compliance with the AEPS Act are recoverable on "a full and current basis pursuant to an automatic energy adjustment clause" under Section 1307, as a cost of generation supply. 73 P.S. § 1648.3(a)(3); *see also AEPS Regulations*, § 75.67(d) (providing for recovery of compliance costs).

26. In *PECO AEPS I*, the Commission approved a Section 1307(g) surcharge for recovery of PECO's AEPS costs, including deferral of all costs associated with PECO's procurement of non-solar Tier I AECs during PECO's Cost-Recovery Period and the recovery of such costs following the end of PECO's Cost-Recovery Period, with carrying charges computed at a rate of six percent (6%). *PECO AEPS I*, p. 6; PECO Tariff Electric Pa. P.U.C. No. 3, Original Page Nos. 34A-34B. In accordance with *PECO AEPS I*, PECO's default service program details how this surcharge will be collected after the end of PECO's Cost-Recovery Period and included in the "price to compare" for all PECO customers, as provided in the Commission's default service regulations. *See PECO Default Service Program*; 52 Pa. Code §§ 54.187 & 75.67(d).

In this proceeding, consistent with *PECO AEPS I and II*, PECO's existing tariff, and the *AEPS Regulations*, PECO requests recovery of all costs related to and in compliance with the RFP process as approved by the Commission in this proceeding and with the procurement of additional AECs necessary for AEPS compliance as described in Section IV. The costs of Supplemental AECs for the PECO Share, as well as any gains (or losses) associated with AECs sold due to changes in the PECO Share, will be credited consistently with other AEPS compliance costs for residential default service customers. In addition, any other costs and proceeds (including losses) associated with the purchase of AECs necessary for compliance or sales of excess AECs will be credited to residential, commercial, and industrial default service customers consistent with PECO's existing default service and AEPS cost recovery tariff provisions and the *Default Service Order*.<sup>5</sup>

## V. PROCEDURAL ISSUES AND REQUEST FOR EXPEDITIOUS COMMISSION APPROVAL

27. Based upon PECO's successful completion of procurements under *AEPS I* and *AEPS II* and the similar procedures set forth in this filing, and in order to have the additional AEPS-related procedures in place before the end of the 2010-2011 Reporting Year, PECO proposes the following expedited schedule:

November 17, 2010

Petition Filing

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<sup>5</sup> For example, the costs associated with the procurement of replacement AECs following the failure of a supplier under contract to PECO to provide AECs will be allocated to all default service customers. However, any costs associated with the procurement of replacement AECs following the default of a full requirements supplier will be allocated to the default service procurement class for which that supplier was obligated to supply. Likewise, proceeds of sales of excess AECs obtained from full requirements suppliers will be credited to the default service procurement class for which that supplier was obligated to supply AECs. Proceeds of sales of excess AECs obtained from separately procured AECs will be credited to all default service customers in the manner in which associated costs were allocated.

28. Lastly, PECO emphasizes that the issues presented by this Petition are interrelated and must be considered as a whole by the Commission. Absent express approval of PECO's proposed RFP procedures, the form AEC Agreement, and cost recovery in accordance with *PECO AEPS I and II* and its existing tariff, PECO will be unable to proceed with the RFP or the purchase and sale of AECs in accordance with the Settlement.

## VI. NOTICE

29. PECO has served a copy of this Petition on all parties to the Settlement. Should the Commission conclude that further notice of this filing is appropriate, PECO will provide such additional notice as directed by the Commission.

## VII. CONCLUSION

WHEREFORE, Petitioner, by its counsel, respectfully requests that the Commission grant this Petition and enter an order providing:

1. That PECO Energy Company's Request for Proposals (Exhibit 1) to procure Supplemental AECs annually (including a combined procurement of Tier II AECs for AEPS Reporting Years 2010-2011 and 2011-2012) is approved;

2. That the form AEC Purchase and Sale Agreement contained in Exhibit 1 is approved for use with any successful bidder and, in the event any affiliate of PECO Energy Company is a successful bidder, is approved for purposes of 66 Pa. C.S. § 2102;

3. That PECO is permitted to procure purchase additional AECs necessary for compliance that are not obtained through its annual Supplemental AEC procurement and sell any excess AECs it may obtain that cannot be applied to its AEPS requirements through independent

third-party auctions and/or brokers experienced in the purchase and sale of AECs as described herein; and

4. That PECO Energy Company is permitted to recover all costs related to and in compliance with the Request for Proposals and additional purchase and sale of AECs as described herein consistent with its existing AEPS Section 1307(g) tariff provision approved by the Commission in *PECO AEPS I*.

Respectfully submitted,

  
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BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

PETITION OF PECO ENERGY :  
COMPANY FOR APPROVAL TO :  
PROCURE TIER II ALTERNATIVE : Docket No. P-2010-  
ENERGY CREDITS AND ADDITIONAL :  
TIER I AND SOLAR ALTERNATIVE :  
ENERGY CREDITS :

CERTIFICATE OF SERVICE

I hereby certify that I have this day served copies of the **Petition of PECO Energy Company For Approval to Procure Tier II Alternative Energy Credits and Additional Tier I and Solar Alternative Energy Credits** upon all parties to PECO's Default Service Proceeding, Docket No. P-2008-2062739, as set forth below:

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Dated: November 17, 2010

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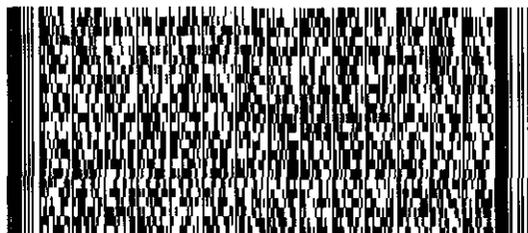
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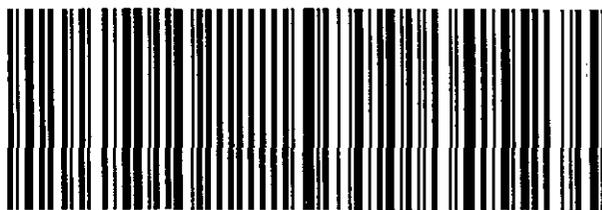
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