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August 29, 2011

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

Re: Petition of PPL Electric Utilities for Approval to Implement a Reconciliation
Rider for Default Service Supply
Commission Docket No. P-2011-2256365

Dear Secretary Chiavetta:

Enclosed for filing is the original of the Petition to Intervene of Richards Energy Group, Inc. in the above captioned proceeding which was filed electronically this date. A copy of this Petition has been served upon those parties set forth in the accompanying Certificate of Service.

If you have any questions, please feel free to contact me. Thank you for your cooperation.

Very truly yours,


Craig A. Doll

Enclosure

cc: Per Certificate of Service
F. Richards

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of PPL Electric Utilities Corporation :
for Approval to Implement a Reconciliation : Commission Docket No. P-2011-2256365
Rider for Default Service Supply Service :

PETITION TO INTERVENE
OF
RICHARDS ENERGY GROUP, INC.

Richards Energy Group, Inc. (“Richards”), by and through its undersigned counsel and pursuant to the provisions of 52 Pa. Code §5.71, *et seq.* files this Petition to Intervene in the above captioned proceeding. In support of this Petition, Richards states as follows:

1. Communications and correspondence concerning this matter should be directed to:

Craig A. Doll, Esquire
25 West Second Street
P.O. Box 403
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(717) 566-9000
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with a copy to:

Mr. Frank Richards
Richards Energy Group, Inc.
781 S. Chiques Road
Manheim, PA 17545

2. Richards is a licensed electric generation supplier, authorized by this Commission at A-110072 to provide services to commercial, industrial, and institutional customers within the Commonwealth of Pennsylvania.

3. At present within its customer group, Richards provides services to approximately 1358 electric accounts which are provided distribution services by PPL Electric Utilities Corporation (“PPL”).

4. On or about August 3, 2011, PPL filed a Petition with the Pennsylvania Public Utility Commission seeking to alter the method by which it recovered the differential between alleged costs incurred and the amount billed customers. As understood by Richards, PPL proposes to eliminate the current method of recovery of under-collections and refund of over-collections through the application of the E-factor contained within its TSC, GSC-1, and GSC-2 tariffs which are currently applicable only upon default customers in favor of a Reconciliation Rider which would, in certain instances, also apply to recent shopping customers.

5. As part of this proposal, PPL would institute a separate line item charge, remove the cents per kwh amount contained in this line item from the price to compare, and impose this charge not only upon customers taking default service but also upon those customers who switch from default service to shopping for a period of time “equal to the number of consecutive months, not to exceed 12, that the customer took default service.” In addition, this charge would not be included in the Price to Compare, where, as a cost of generation and transmission, it rightfully belongs.

6. On or about August 25, 2011, PPL filed an Amended Petition which proposed a Competitive Transition Rider in addition to the Reconciliation Rider contained in PPL’s original Petition. It appears that the purpose of this rider is to collect under collections incurred to date from both shopping and default service customers whether or not they were shopping at the time these costs were allegedly incurred in providing default service.

7. Richards believes that the imposition of these charges upon shopping or potential shopping customers will have a chilling effect upon the desire of customers to seek alternatives to default service; may distort the true cost of default service being received by the customer, and may not be consistent with the provisions of the Public Utility Code and this Commission's regulations.

8. Richards submits that as a certificated EGS, it has a direct, substantial and immediate interest in insuring that the proposal is just and reasonable and do not harm the competitive environment within the Commonwealth. S such Richards has standing to intervene in this proceeding.

9. Even if other generation suppliers or marketers seek intervention in this proceeding, Richards' interests is significant and unique. Richards and its customer group will be affected by any Commission action in this proceeding. Any order of the Commission will bind Richards and its customer group.

10. Permitting Richards intervention in this proceeding will not delay any on-going activity in this proceeding nor prejudice any existing party or the public interest. Richards submits that the public interest is best served by permitting the intervention of Richards in this proceeding.

WHEREFORE, Richards Energy Group, Inc. respectfully requests that this Petition be granted and that it be permitted to participate in this proceeding with full party status.

Respectfully submitted,



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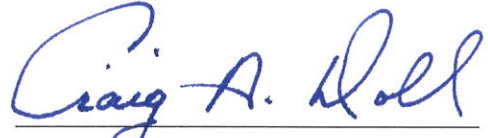
Attorney I.D. # 22814

Attorney for Richards Energy Group, Inc.

Dated: August 29, 2011

ATTORNEY'S VERIFICATION

I, Craig A. Doll, Esquire, attorney for Richards Energy Group, Inc. hereby verify that I have become acquainted with the facts and information set forth in the foregoing document; that the same are true to the best of my knowledge information and belief and that the foregoing verification is made subject to the penalties of 18 Pa. C.S. § 4904.


Craig A. Doll, Esquire

DATED: August 29, 2011

CERTIFICATE OF SERVICE

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

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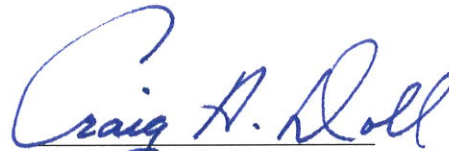
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