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October 5, 2011

VIA ELECTRONIC FILING AND HAND DELIVERY

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

RE: Petition of PPL Electric Utilities Corporation for Approval to Implement a Reconciliation Rider for Default Supply Service Docket No. Docket No. R-2011-2264771
PETITION TO INTERVENE OF DOMINION RETAIL, INC.

Dear Secretary Chiavetta:

Enclosed for filing with the Commission are the original and three (3) copies of the Petition to Intervene of Dominion Retail, Inc. d/b/a Dominion Energy Solutions to the Petition of PPL Electric Utilities Corporation in the above-captioned docket. Copies of this Memorandum have been served in accordance with the attached Certificate of Service.

Thank you for your attention to this matter. If you have any questions related to this filing, please contact the undersigned.

Very truly yours,

Todd S. Stewart
Counsel for Dominion Retail, Inc.

TSS/alw
Enclosures

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 accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a party)

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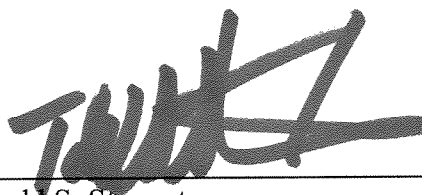
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Todd S. Stewart

Dated this 5th day of October 2011

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

PPL Electric Utilities Corporation's	:	
Supplement No. 1102 Tariff Electric -	:	Docket No. R-2011-2264771
Pa. P.U.C. No. 201- Time-of-Use Rates	:	

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

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

1. On or about September 26, 2011, PPL Electric Utilities Corporation (“PPL”) filed Supplement No. 110 to its Tariff Electric-Pa. P.U.C. No. 201 to implement revised Time-Of-Use (“TOU”) rates. PPL made this filing in an effort to comply with the Pennsylvania Public Utility Commission (“Commission”) Order entered August 25, 2011 at Docket No. M-2011-225873 which directed PPL to submit revisions to its TOU Program within thirty (30) days.

2. Time-of-use rates are required by Act 129 of 2008, P.L. 1592, No. 129 § 3 (Nov. 14, 2008), 66 Pa. C.S. § 2807(f)(5). However, it also is true that the presently approved ratemaking methodology for PPL’s time-of-use rates has produced serious anomalies almost from the beginning, that have been evidenced by non-market reflective extremes in TOU rates. TOU rates that don’t reflect the actual market price of power are contrary to the legislative intent that the rates reflect actual real-time prices at the time the electrical energy is consumed.

3. These non-market rate incidents include most notably the TOU rates offered at the beginning of 2011, where both the on and off-peak rates were substantially below market, and includes the rates that would have been produced under the same methodology for the present period that would have been drastically above market.

4. DES believes that there is a fundamental design flaw in the manner in which the Commission has required electric distribution companies such as PPL to implement TOU rates. While DES believes that PPL's proposed TOU rates make a step in the correct direction, it does not believe that the design changes should be made a permanent solution, since DES believes that additional work is required in order to create a functional and competitively neutral time-of-use rate that actually provides benefits to customers and does not result in significant under or over collections on an ongoing basis. It is not clear whether PPL's proposal in this case meets that standard.

5. DES will be represented in this matter by the following counsel:

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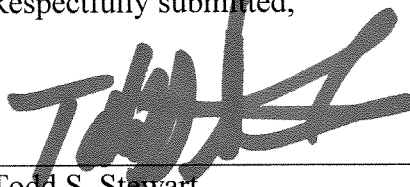
6. DES is the trade name of Dominion Retail, Inc. which is a licensed electric generation supplier throughout the Commonwealth of Pennsylvania and has actively participated in the litigation of the Default Service Plans of every major Pennsylvania Utility including PPL. DES is substantially engaged in the PPL market.

7. DES believes that PPL's filing and proposal in this case require additional examination and believes that its participation in this proceeding is vital to protect its interest as an EGS with a significant number of customers in the PPL system. DES suffered significant and potentially avoidable losses as a result of PPL's incorrectly designed TOU rates and it seeks to ensure that such rates are not approved in the future. Based up its experience, and the fact that it serves a significant number of customers on the PPL system, DES' interest in this proceeding cannot adequately be represented by any other party. Moreover, as a supplier licensed to provide service in the PPL service territory, DES will be bound by any action of the Commission in this proceeding.

8. Accordingly, DES has established that it has a unique and substantial interest in this matter that cannot adequately be represented by any other party and that it will be bound by the outcome of this proceeding in accordance with the requirements of 52 Pa. Code § 5.72(a).

WHEREFORE, DES respectfully requests that its Petition to Intervene in the above-captioned matter be granted and that it be allowed full party status in this matter.

Respectfully submitted,

A large, bold, handwritten signature in black ink, appearing to read 'T. Stewart', is written over a horizontal line.

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Dated: October 5, 2011