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February 8, 2012

VIA ELECTRONIC FILING AND HAND DELIVERY

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

RE: Petition of PECO Energy Company For Approval of its Default Service Program,
Docket No. P-2012-2283641; **JOINT PETITION TO INTERVENE OF DOMINION
RETAIL, INC. AND INTERSTATE GAS SUPPLY, INC.**

Dear Secretary Chiavetta:

Enclosed for filing with the Commission are the original and three (3) copies of the Joint Petition to Intervene of Dominion Retail, Inc. d/b/a Dominion Energy Solutions and Interstate Gas Supply, Inc. in the above-captioned docket. Copies of this Petition 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. and
Interstate Gas Supply, Inc.*

TSS/alh
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 the manner indicated below, and in accordance with the requirements of 52 P.A. Code §1.54 (relating to service by a party).

VIA EMAIL AND FIRST CLASS MAIL

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Todd S. Stewart

Dated this 8th day of February, 2012

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Petition of PECO Energy Company :
For Approval of its Default Service Program : Docket No. P-2012-2283641

**JOINT PETITION TO INTERVENE OF
DOMINION RETAIL, INC. AND
INTERSTATE GAS SUPPLY, INC.**

AND NOW, comes Dominion Retail, Inc., d/b/a Dominion Energy Solutions (“DES”) and Interstate Gas Supply, Inc. d/b/a IGS Energy (“IGS”) (collectively “EGSs”) by and through their counsel, Hawke McKeon & Sniscak, LLP, and hereby jointly Petition to Intervene in the above-captioned matter pursuant to 52 Pa. Code § 5.71, *et seq.* In support of their Petition to Intervene, the EGSs state and aver as follows:

1. On or about January 13, 2012, PECO Energy Company (“PECO”) petitioned¹ the Pennsylvania Public Utility Commission (“Commission”) for approval of a default service program for the period June 1, 2013 through May 31, 2015.
2. Notice of the DSP II filing was published by the Commission’s Secretary and required that interventions and answers must be filed on or before February 13, 2012.
3. From the EGS’ perspective, the more noteworthy portions of PECO’s DSP II plan are PECO’s proposals: 1) to modify its procurement processes to eliminate block and spot purchases wherever possible in order to avoid the potential for contracts that overhang the end of the DSP II; 2) to recover all AEPS requirements through default service charges as opposed to its

¹ *Petition of PECO Energy Company for Approval of its Default Service Program*; Docket No. P-2012-2283641 (“DSP II”).

current methodology which recovers a portion of those charges through a surcharge; 3) a change to annual reconciliation for the over and under charges associated with its DSP II default service costs, which would replace its existing quarterly mechanism; 4) an opt-in auction for fifty percent (50%) of its non-shopping default service load coupled with a customer referral program, dubbed “Supplier of the Month”, which would allow for suppliers to bid to be the standard offer company for a one month period; and, 5) PECO has proposed to enhance its standard new/mover program. PECO seeks to recover the costs of these programs from EGSs.

4. The EGSs are represented in this matter by the following counsel:

Todd S. Stewart, Attorney I.D. No. 75556
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Please direct copies of all documents filed previously in this case to the above referenced counsel, and serve counsel with copies of any documents filed hereafter. Counsel hereby agrees to accept service by electronic mail when followed by hard copy served by first class mail.

5. DES is the trade name of Dominion Retail, Inc. DES is an electric generation supplier licensed to serve customers throughout the Commonwealth of Pennsylvania. DES currently provides service to customers in the PECO service territory.

6. IGS is the trade name of Interstate Gas Supply, Inc. IGS is an electric generation supplier licensed to serve customers throughout the Commonwealth of Pennsylvania. IGS currently provides service to customers in the PECO service territory.

7. While the EGSs continue to review PECO's DSP II filing, and while a number of items in that filing appear to be beneficial to customers and EGS' serving in the PECO service territory, several components of the DSP proposal cause concern as well. In particular, PECO's proposal to elongate the reconciliation period from a quarterly reconciliation to an annual reconciliation period may be problematic in that it will further disassociate the default service rate from the market costs of energy. Moreover, PECO's proposed market-enhancement programs, particularly the default opt-in auction and Supplier of the Month program, both require modifications to make them fair and competitively neutral.

8. As EGSs operating in the PECO service territory, DES and IGS are in a unique position and have a substantial interest in the subject matter addressed in PECO's DSP II filing that cannot be addressed by any other party or parties. Moreover, because both EGS' are serving customers on the PECO system, they will be bound by any decision by the Commission in this case. Finally, the EGS' have actively participated in the Commission's ongoing proceedings in its Retail Markets Investigation and other proceedings intended to enhance the competitiveness of the retail electricity markets in Pennsylvania. Accordingly, their combined experience and insight will prove invaluable to the Commission in resolving the competitive market issues raised by PECO's DSP II plan.

9. Accordingly, DES and IGS believe that they have demonstrated the requisite standing to meet the requirements of 52 Pa Code § 5.72(a), for standing to intervene in the above captioned proceeding and accordingly request that their intervention be granted.

WHEREFORE, DES and IGS respectfully requests that their Joint Petition to Intervene in the above-captioned proceeding be granted and that they be allowed full party status in these matters.

Respectfully submitted,



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Interstate Gas Supply, Inc.*

Dated: February 8, 2012