

610-929-3601

*Tori L. Giesler, Esq.*  
*(610) 921-6658*  
*(610) 939-8655 (Fax)*

February 10, 2012

**VIA ELECTRONIC FILING**

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

***Re: Petition of PECO Energy Company for Approval of its Default Service Program; Docket No. P-2012-2283641***

Dear Secretary Chiavetta:

Pursuant to Section 52 Pa. Code §§ 5.72 – 5.74 and the January 28, 2012 notice published in the *Pennsylvania Bulletin*, enclosed for filing is the Petition to Intervene of Metropolitan Edison Company, Pennsylvania Electric Company, Pennsylvania Power Company and West Penn Power Company in the above-referenced proceeding.

Please contact me if you have any questions.

Very truly yours,



Tori L. Giesler

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Enclosures

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

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

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PETITION TO INTERVENE OF METROPOLITAN EDISON  
COMPANY, PENNSYLVANIA ELECTRIC COMPANY,  
PENNSYLVANIA POWER COMPANY AND  
WEST PENN POWER COMPANY

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Pursuant to Section 52 Pa. Code §§ 5.72 – 5.74, Metropolitan Edison Company (“Met-Ed”), Pennsylvania Electric Company (“Penelec”), Pennsylvania Power Company (“Penn Power”) and West Penn Power Company (“West Penn”) (collectively, “the Companies”) hereby file this Petition to Intervene in the above-captioned proceeding. In support of this Petition, the Companies state as follows:

1. On January 13, 2012, PECO Energy Company (“PECO”) filed with the Pennsylvania Public Utility Commission (“Commission”) its Petition seeking approval of its second default service program (“Petition”), to cover the period June 1, 2013 through May 31, 2015.
2. Notice was published in the *Pennsylvania Bulletin* on January 28, 2012, directing that formal protests, petitions to intervene and answers be filed with the Commission on or before February 13, 2012.
3. The Companies file this Petition to Intervene consistent with the January 28, 2012 notice and the Commission’s regulations at 52 Pa. Code § 5.74.

4. The Commission's regulation at 52 Pa. Code § 5.72 governs eligibility to intervene in such a proceeding, and permits a petition to intervene to be filed by a "person claiming a right to intervene or an interest of such nature that intervention is necessary or appropriate to the administration of the statute under which the proceeding is brought." 52 Pa. Code § 5.72(a).

5. A potential party is eligible under this section where it can assert and demonstrate "an interest which may be directly affected and which is not adequately represented by existing participants, and as to which the petitioner may be bound by the action of the Commission in the proceeding." 52 Pa. Code § 5.74(a)(2).

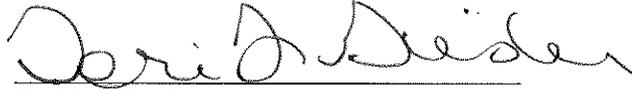
6. The Companies are electric distribution companies ("EDCs") serving customers throughout Pennsylvania.

7. On April 29, 2011, the commission initiated the Investigation of Pennsylvania's Retail Electricity Market at Docket No. I-2011-2237952 ("Investigation"). This Investigation may have widespread impacts upon the upcoming default service plans for all Pennsylvania EDCs, and these issues may be raised within the context of this proceeding. Therefore, the Companies may be directly affected and bound by the outcome of this proceeding due to the nature of the overlapping issues raised by both the Investigation and this proceeding.

8. For these reasons, there are no other parties that can adequately represent the interests of the Companies in this proceeding and, as such, the Companies' Petition to Intervene should be granted.

WHEREFORE, the Companies respectfully request that the Commission grant this  
Petition to Intervene.

Dated: February 10, 2012



Tori L. Giesler  
Attorney No. 207742  
FirstEnergy Service Company  
2800 Pottsville Pike  
P.O. Box 16001  
Reading, PA 19612-6001  
Phone: (610) 921-6658  
Fax: (610) 939-8655  
Email: [tgiesler@firstenergycorp.com](mailto:tgiesler@firstenergycorp.com)

Counsel for:  
Metropolitan Edison Company,  
Pennsylvania Electric Company,  
Pennsylvania Power Company and  
West Penn Power Company

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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

**CERTIFICATE OF SERVICE**

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

Service by first class mail and electronic mail, as follows:

Steven C. Gray, Esq.  
Acting Small Business Advocate  
Office of Small Business Advocate  
Suite 1102, Commerce Building  
300 North Second Street  
Harrisburg, PA 17101  
[sgray@state.pa.us](mailto:sgray@state.pa.us)

Johnnie E. Simms, Esq.  
Bureau of Investigation & Enforcement  
Pennsylvania Public Utility Commission  
P.O. Box 3265  
Harrisburg, PA 17105-3265  
[josimms@state.pa.us](mailto:josimms@state.pa.us)

Todd S. Stewart, Esq.  
Hawke McKeon & Sniscak LLP  
100 North Tenth Street  
Harrisburg, PA 17101  
[tsstewart@hmslegal.com](mailto:tsstewart@hmslegal.com)

Irwin A. Popowsky, Esq.  
Office of Consumer Advocate  
555 Walnut Street – 5<sup>th</sup> Floor  
Harrisburg, PA 17101-1923  
[spopowsky@paoca.org](mailto:spopowsky@paoca.org)

Anthony E. Gay, Esq.  
Jeanne J. Dworetzky, Esq.  
PECO Energy Company  
2304 Market Street  
P.O. Box 8699  
Philadelphia, PA 19101-8699  
[Jeanne.Dworetzky@exeloncorp.com](mailto:Jeanne.Dworetzky@exeloncorp.com)

Thomas P. Gadsden, Esq.  
Kenneth M. Kulak, Esq.  
Brooke E. Leach, Esq.  
Morgan, Lewis, Bockius LLP  
1701 Market Street  
Philadelphia, PA 19103-2921  
[tgadsden@morganlewis.com](mailto:tgadsden@morganlewis.com)

Dated: February 10, 2012



Tori L. Giesler  
Attorney No. 207742  
FirstEnergy Service Company  
2800 Pottsville Pike  
P.O. Box 16001  
Reading, Pennsylvania 19612-6001  
(610) 921-6658  
[tgiesler@firstenergycorp.com](mailto:tgiesler@firstenergycorp.com)