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May 9, 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 PPL Electric Utility Corporation for Approval Of a Default Service Program and Procurement Plan for the Period June 1, 2013 Through May 31, 2015, Docket No. P-2012-2302074; **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 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

MAILING ADDRESS: P.O. BOX 1778 HARRISBURG, PA 17105

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 9th day of May 2012

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Petition of PPL Electric Utilities Corporation :
for Approval Of a Default Service Program and : Docket No. P-2012-2302074
Procurement Plan for the Period June 1, 2013 :
Through May 31, 2015 :

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

AND NOW, come Dominion Retail, Inc., d/b/a Dominion Energy Solutions (“DES”), and Interstate Gas Supply, Inc., d/b/a IGS Energy (“IGS”)(collectively, “EGS Parties”), 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.* The EGS Parties are both licensed Electric Generation Suppliers (“EGS”) serving customers in of PPL Electric Utilities Corporation (“PPL”) service territory, and accordingly both have a direct and substantial interest in the outcome of this proceeding. In support of their Joint Petition to Intervene, the EGS Parties state and avers as follows:

1. The EGS Parties are electric generation suppliers licensed by the Pennsylvania Public Utility Commission (“Commission”) and both serve customers in PPL’s service territory. The EGS Parties have actively participated in the Commission’s ongoing efforts to create more competitive retail electricity markets in Pennsylvania.¹

¹ *Investigation into Pennsylvania’s Retail Electricity Market: Intermediate Work Plan*, Docket No. I-2011-2237952. (Final Order entered March 2, 2012)(“RMI Order”).

2. The EGS Parties are represented in this matter by the following counsel. Please serve this counsel with all documents hereafter filed in this proceeding by electronic and paper form and please maintain him the primary contact on all service lists hereafter established.

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Please also include the following counsel on the electronic service list or any expanded service lists in this matter:

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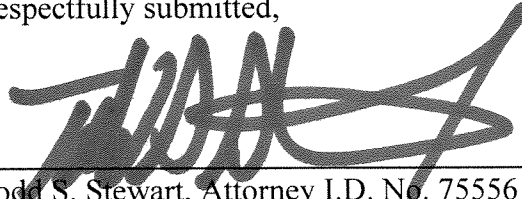
3. On or about May 1, 2012 PPL filed a Petition with the Commission seeking approval of a Default Service Plan (“DSP”) for the period June 1, 2013 through May 31, 2015. In addition to a modified procurement regimen, PPL has proposed several market enhancements in apparent reaction to the Commission’s ongoing Retail Markets Investigation process. PPL’s proposed market enhancements, however are not entirely consistent with the Commission’s RMI Order and require modification in order to be acceptable to the EGS Parties. These enhancements and PPL’s procurement plan will be the focus of the EGS party’s participation, as will be PPL’s proposed modifications to its current reconciliation methodology and its apparent

intent to incorporate its recent migration rider proceeding² into this proceeding. The EGS parties' review of PPL's Petition is ongoing and they reserve the right to address additional issues that are revealed as part of that review.

4. Because the EGSs serve customers in PPL's service territory, they have a direct and substantial interest in the outcome of this matter that cannot be adequately represented by any other party to this proceeding. Moreover, they will be bound by any Commission decision in this matter. Accordingly, the EGS Parties meet the criteria for intervention established in the Commission's regulations at 52 Pa. Code § 5.72(a)(2).

WHEREFORE, DES and IGS respectfully request that the Pennsylvania Public Utility Commission grant their Joint Petition to Intervene in the above-captioned proceeding and that they be granted full party status in this matter.

Respectfully submitted,



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Counsel for Dominion Retail, Inc., and Interstate Gas Supply, Inc.

Dated: May 9, 2012

² *Petition of PPL Electric Utilities Corporation to Implement a Reconciliation Rider for Default Supply Service, Docket No. P-2011-2556365 (Recommended Decision issued April 4, 2012).*