

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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

**PETITION TO INTERVENE OF
FIRSTENERGY SOLUTIONS CORP.**

Pursuant to 52 Pa. Code §§ 5.71-5.75, FirstEnergy Solutions Corp. ("FES"), by and through its attorneys, hereby files this Petition to Intervene in the above-captioned proceeding, and in support thereof avers the following:

1. FES is a subsidiary of FirstEnergy Corp., a diversified energy services holding company headquartered in Akron, Ohio. FES provides wholesale and retail energy and related products to customers located primarily in the Mid-Atlantic and Midwest regions. FES has participated in the competitive default service supply procurements of all the largest electric distribution companies ("EDCs") in Pennsylvania, including PPL Electric Utilities Corporation ("PPL"). FES is also a licensed Electric Generation Supplier ("EGS") in Pennsylvania, having been authorized at Docket No. A-110078 to serve retail customers throughout the Commonwealth. In addition, FES has actively participated in the Pennsylvania Public Utility Commission's ("Commission") Retail Markets Investigation at Docket No. I-2011-2237952, in which the Commission entered an Order on December 16, 2011 giving guidance on the format and structure of Pennsylvania EDCs' default service programs, including the instant program proposed by PPL at this docket.

2. On or about May 1, 2012, PPL filed a Petition for Approval of a Default Service Program ("Petition") for the period June 1, 2013 through May 31, 2015. The Petition requests

Commission approval of a Default Service Program to establish the terms and conditions under which PPL will procure and supply default service and meet requirements of the Alternative Energy Portfolio Standards Act for that period. The Petition also proposes and requests Commission approval of customer education mailings in 2012, a new/moving customer referral program, a Standard Offer Customer Referral Program, a Retail Opt-In Auction, and a Customer Referral Mailing (collectively, "market enhancement programs") for certain of PPL's default service customers.

3. FES will be represented in this proceeding by the following attorneys, and requests that their names and addresses be placed on the Commission's service list and that they receive copies of all correspondence and other documents in this matter:

Amy M. Klodowski, Esq.
FirstEnergy Solutions Corp.
800 Cabin Hill Dr.
Greensburg, PA 15601
Phone: (724) 838-6765
Facsimile: (234) 678-2370
aklodow@firstenergycorp.com

Brian J. Knipe, Esq.
Buchanan Ingersoll & Rooney, PC
17 North Second Street, 15th Floor
Harrisburg, PA 17101-1503
Telephone: (717) 237-4280
Facsimile: (717) 233-0852
brian.knipe@bipc.com

4. Intervention in Commission proceedings is permitted where a person has an interest in the matter "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," or "another interest of such nature that participation of the petitioner may be in the public interest." 52 Pa. Code § 5.72(a)(2), (3).

5. FES is a potential participant in the competitive wholesale power procurement process by which PPL will procure electric generation supply to meet the needs of its default service customers. FES is also a potential participant in PPL's market enhancement programs. FES, as a licensed EGS currently serving retail customers in Pennsylvania, has a compelling

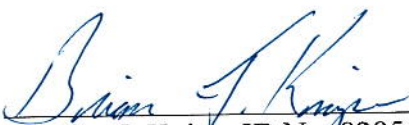
interest in assuring that the terms, conditions and pricing of default service supply, and the terms and conditions of PPL's market enhancement programs, have no adverse effect on competition in general, or on FES's ability to compete for retail sales to customers in PPL's service territory in particular. Accordingly, FES has several direct and substantial interests in this matter.

6. FES's interests cannot be adequately represented by any other party to this proceeding.

7. Because of the significance of this matter to FES as a wholesale electric supplier and a licensed EGS, FES requests that it be permitted to intervene in this matter and that it be placed on the service list.

WHEREFORE, for all of the foregoing reasons, FirstEnergy Solutions Corp. respectfully requests that the Pennsylvania Public Utility Commission grant its Petition to Intervene in any and all proceedings instituted in connection with the Petition.

Respectfully submitted,

By: 
Brian J. Knipe, ID No. 82854
Buchanan Ingersoll & Rooney, P.C.
17 North Second Street, 15th Floor
Harrisburg, PA 17101-1503
Phone: (717) 237-4820
Fax: (717) 233-0852
brian.knipe@bipc.com

Amy M. Klodowski, ID No. 28068
FirstEnergy Solutions Corp.
800 Cabin Hill Dr.
Greensburg, PA 15601
Phone: (724) 838-6765
Facsimile: (234) 678-2370
aklodow@firstenergycorp.com

Dated: June 1, 2012

Attorneys for FirstEnergy Solutions Corp.

VERIFICATION

I, TONY C. BANKS, Vice President, Competitive Market Policies for FirstEnergy Solutions Corp., am authorized to make this Verification. I hereby state that the facts above set forth are true and correct (or are true and correct to the best of my knowledge, information and belief), and that I expect to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa.C.S. § 4904 (relating to unsworn falsification to authorities).

Date: 5/31/12



Tony C. Banks

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

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

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 § 1.54 (relating to service by a party).

Via First Class Mail and E-Mail

David B. MacGregor Esquire
Post & Schell PC
Four Penn center
1600 John F. Kennedy Boulevard
Philadelphia PA 19103-2808

Michael W. Hassell Esquire
Post & Schell PC
12th Floor
17 North Second Street
Harrisburg PA 17101-1601

Paul E. Russell Esquire
Associate General Counsel
PPL Services Corporation
Two North Ninth Street
Allentown, PA 18101

Steven C Gray Esquire
Office Of Small Business Advocate
300 North Second Street
Suite 1102
Harrisburg PA 17101

Regina Matz Esquire
PA PUC BI&E Legal Technical
Second Floor West
400 North Street
Harrisburg PA 17120

William Lehman Esquire
Hawke McKeon & Sniscak LLP
100 North Tenth Street
PO Box 1778
Harrisburg PA 17105-1778

Todd S Stewart Esquire
Hawke McKeon & Sniscak LLP
100 North Tenth Street
PO Box 1778
Harrisburg PA 17105-1778

James Mullins Esquire
Erin Gannon Esquire
Tanya McCloskey Esquire
Office Of Consumer Advocate
555 Walnut Street
Forum Place 5th Floor
Harrisburg PA 17101-1923

Gary A Jeffries Esquire
Assistant General Counsel
Dominion Retail Inc
Suite 400
501 Martindale Street
Pittsburgh PA 15212-5817

Charles E. Thomas, III, Esquire
Norman J. Kennard, Esquire
Thomas Long Niesen & Kennard
212 Locust Street, Suite 500
PO Box 9500
Harrisburg, PA 17108-9500

Via First Class Mail

Pamela C Polacek Esquire
McNees Wallace & Nurick
100 Pine Street
PO Box 1166
Harrisburg PA 17108-1166

PPL EnergyPlus LLC
Two North Ninth Street
Allentown, PA 18101-1179

Hess Corporation
One Hess Plaza
Woodbridge, NJ 07095-0961

Energy Cooperative of
America, Inc.
1408 Sweet Home Road
Suite 8
Amherst, NY 14228

Constellation New Energy
1221 Lamar Street
Suite 750
Houston, TX 77010

Palmco Power Pa, LLC
1350 60 Street
Brooklyn, NY 11219

Vince Parisi, Esquire
General Counsel
Interstate Gas Supply, Inc. d/b/a IGS Energy
6100 Emerald Pkwy
Dublin, OH 43016

Eric J. Epstein
4100 Hillsdale Road
Harrisburg PA 17112

Linde Energy Services Inc.
1 Greenwich Street, Suite 200
Stewartsville, NJ 08886

Champion Energy Services, LLC
1500 Rankin Road
Houston, TX 77067

Energy Plus Holdings LLC
3711 Market Street
10th Floor
Philadelphia, PA 19104

Nextera Energy Services
20455 Sh 249
Suite 200
Houston, TX 77070

Reliant Energy
1000 Main Street
Houston, TX 77002

Washington Gas Energy Services
13865 Sunrise Valley Drive,
Suite 200
Herndon, VA 20171

DTE Energy Supply, Inc.
414 S. Main Street
Suite 200
Ann Arbor, MI 48104

UGI Energy Services Inc.
1 Meridian Boulevard
Suite 2C01
Wyomissing, PA 19610

Bluestar Energy
363 W. Erie
Suite 700
Chicago, IL 60654

Conedison Solutions
100 Summit Lake Drive
Suite 410
Alhalla, NY 10595

South Jersey Energy
One North White Horse Pike
Floor 2
P.O. Box 152
Hammonton, NJ 08037

Liberty Power
1901 W Cypress Creek Road
Suite 600
Fort Lauderdale FL 33309

Anthracite Power & Light
617 Altamont Blvd
Frackville PA 17931

Gateway Energy Services Corporation
400 Rella Blvd
Suite 300
Montebello NY 10901

Glacial Energy
5326 Yacht Haven Grande
Box 36
St. Thomas, VI 00802

GDF Suez
1990 Post Oak Boulevard
Suite 1900
Houston, TX 77056

Verde Energy USA, Inc.
101 Merritt 7
3rd Floor
Norwalk, CT 06851

Clearview Electric Inc.
P.O. Box 130659
Dallas, TX 75313

Energetix Inc.
50 Methodist Hill Drive
Suite 1500
Rochester, NY 14623

MXEenergy Electric Inc.
711 Louisiana Street, Suite 1000
Houston, TX 77002

Exelon Energy
300 Exelon Way
Kennett Square PA 19348

EEAPA
2171 West 38th Street
Erie PA 16508

Dominion Retail
501 Martindale Street
4th Floor
Pittsburgh PA 15212

Direct Energy Business
1001 Liberty Center
Pittsburgh, PA 15222

Oasis Power LLC D/B/A Oasis Energy
11152 Westheimer Road, Suite 901
Houston, TX 77042

TRIEAGLE
2620 Technology Forest Drive
The Woodlands, TX 77381

Arcelormittal USA LLC
3300 Dickey Road
East Chicago, IN 46312

Paetec Energy
600 Willowbrook Office Park
Fairport, NY 14450

Texas Retail Energy
2001 SE 10th Street
Bentonville, AR 72716

Amerigreen Energy
55 Doe Run Road
Manheim, PA 75202

Bounce Energy
2802 Albany Street
Houston, TX 77006

Think Energy
1990 Post Oak Blvd., Suite 1900
Houston, TX 77056

Hudson Energy
4 Executive Blvd., Suite 30 I
Suffern, NY 10901

Agway Energy Services, LLC
240 Route 10 West
Whippany, NJ 07981

Direct Energy Services, LLC
2488 East 81st Street, Suite 800
Tulsa, OK 74137

DPL Energy Resources
1065 Woodman Drive
Dayton, OH 45432

Great American Power
2959 Cherokee Street, Suite 102
Kennesaw, GA 30144

Planet Energy
10 Kingsbridge Garden Circle #800
Mississauga, ON L5r 3k6

Ambit Northeast, LLC
1801 N. Lamar Street, Suite 200
Dallas, TX 75202

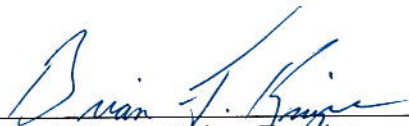
YEP Energy
7660 Woodway Drive, Suite 471A
Houston, TX 77063

Noble Solutions Sempra
401 West A Street, Suite 500
San Diego, CA 92101

HOP Energy, LLC
4 W. Red Oak Lane, Suite 310
White Plains, NY 10643

IDT Energy, Inc.
20 West Third Street, Suite 10
P.O. Box 400
Jamestown, NY 14702

Date: June 1, 2012



Brian J. Knipe, Esquire