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June 4, 2012

**Via Electronic Filing**

Rosemary Chiavetta, Secretary  
PA Public Utility Commission  
PO Box 3265  
Harrisburg, PA 17105-3265

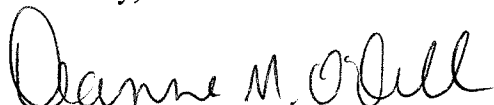
Re: Petition of PPL Electric Utilities Corporation for approval of a Default Service Program  
and Procurement Plan for the Period June 1, 2013 through May 31, 2015,  
Docket No. P-2012-2302074

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Dear Secretary Chiavetta:

On behalf of Direct Energy Services, LLC enclosed for filing please find the original of its  
Petition to Intervene along with the electronic filing confirmation page with regard to the above-  
referenced matter. Copies have been served in accordance with the attached Certificate of  
Service.

Sincerely,



Deanne M. O'Dell

DMO/lww  
Enclosure

cc: Hon. Susan Colwell, w/enc.  
Cert. of Service w/enc.

**CERTIFICATE OF SERVICE**

I hereby certify that this day I served a copy of Direct Energy's Petition to Intervene upon the persons listed below in the manner indicated in accordance with the requirements of 52 Pa. Code Section 1.54.

**Via Email and First Class Mail**

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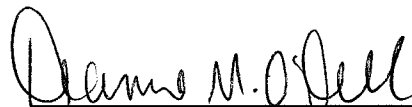
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Dated: June 4, 2012



Deanne M. O'Dell, Esq.

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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

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**PETITION TO INTERVENE  
OF DIRECT ENERGY SERVICES, LLC**

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Pursuant to 52 Pa. Code §§ 5.72-5.75, the public notices filed in the *Pennsylvania Bulletin* on May 19, 2012, Direct Energy Services, LLC (“Direct Energy”) hereby petitions to intervene in the Petition of PPL Electric Utilities Corporation (“PPL” or “Company”) for approval of its Default Service Program for the Period June 1, 2013 through May 31, 2015 (“DSP Petition”). In support of its intervention, Direct Energy states as follows:

1. Direct Energy is an electric generation supplier (“EGS”) licensed by the Commission at A-110164 to provide electricity and related services to retail customers throughout Pennsylvania, including PPL’s service territory. Direct Energy is a North American affiliate of Centrica plc, a leading international provider of energy and other energy-related services with over 32 million customer relationships worldwide. Direct Energy is one of North America’s largest energy and energy services companies with approximately 5.1 million customers, operating in 20 states, the District of Columbia, and all ten provinces in Canada. Direct Energy also owns and operates natural gas fired generation facilities, operates natural gas wells, has significant contracts for wind assets, and offers energy efficiency programs to help manage its customers overall energy bills. Direct Energy decided to locate its North American business corporate headquarters in Pittsburgh, with its employee base continuing to grow as it expands its presence in the state. Lastly, Direct Energy has a unique business model, and

extensive experience in providing energy services to residential, small and large commercial and industrial (“C&I”) customers, and government entities. Direct Energy offers retail energy customers many products and services, including variable, fixed-price, renewable, carbon neutral, demand response, and energy efficiency. .

2. Direct Energy’s attorneys in this matter are:

Daniel Clearfield, Esquire  
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Direct agrees to accept electronic service to all attorneys listed above to be followed up with one hard copy of the documents served.

3. On May 1, 2012, PPL filed its DSP Petition proposing to establish the terms and conditions under which PPL will procure default service supply, provide default service to non-shopping customers, and recover all associated costs on a full and current basis for the period from June 1, 2013 through May 31, 2015. To encourage greater consumer participation in the competitive electric market, PPL is proposing additional customer education initiatives. It also is proposing a retail opt-in auction and a standard offer program. Under these proposals, customers will have an opportunity to purchase their electricity from competitive suppliers at a discount from PPL’s Price to Compare.<sup>1</sup>

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<sup>1</sup> <http://pplweb.mediaroom.com/index.php?s=12270&item=127733>

4. By public notice published in the *Pennsylvania Bulletin* on May 19, 2012,<sup>2</sup> the Commission established a deadline of Monday, June 4, 2012, for formal protests, petitions to intervene and answers. The Initial Prehearing Conference before Administrative Law Judge Administrative Law Judge Susan D. Colwell is scheduled for Wednesday, June 6, 2012.

5. The Commission's regulations allow intervention where a person has an interest in the proceeding which may be directly affected and which is not adequately represented by existing parties, and as to which the person may be bound by the action of the Commission in the proceeding. 52 Pa. Code § 5.72(a)(2). Intervention is also permitted where participation of the person may be in the public interest. 52 Pa. Code § 5.72(a)(3). A "person" includes a corporation and an association. 52 Pa. Code § 1.8.

6. Direct Energy meets the standards for intervention set forth in 52 Pa. Code § 5.72(a). As a supplier of both retail and wholesale power in PPL's territory in the Commonwealth, Direct Energy satisfies the standard for intervention because Direct Energy possesses 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 § 5.72(a)(1).

7. Direct Energy's interests in this proceeding are unique from and not adequately represented by other parties that may seek to intervene, including individual EGSs or other organizations interested in electric competition in Pennsylvania in general and in PPL's service territory in particular. Direct Energy is licensed by the Commission to provide service to customers in PPL's service territory and will continue to do so as long as the market structure

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<sup>2</sup> 42 Pa.B. 2871.

supports sustained and robust electric competition, especially among residential and small commercial customers.

8. PPL's default service plan for the period from June 1, 2013 through May 31, 2015 will have a material effect on competitive development in PPL's service territory. This is especially true because the specifics of the Commission's "market enhancing steps," including opt-in auctions, referral programs and new and moving customer programs shall be determined in this proceeding. Accordingly, PPL's proposals must be implemented in a manner that promotes and encourages the development of a fully competitive retail electricity market, as mandated by the Public Utility Code. Such a result is crucial to ensure that the market environment is conducive to Direct Energy's ability to offer competitive service.

9. In view of Direct Energy's unique business model, Direct Energy's interests in this proceeding cannot be adequately represented by other EGS parties with different business models and different customer target markets.

10. Direct Energy will be bound by the action of the Commission in this proceeding, which will determine PPL's default service rates, terms and conditions effective June 1, 2013. Direct Energy must compete against these rates, and how they are structured will have a significant effect on the level of retail competition that will be experienced in the PPL market during this period and, thus, on the ability of Direct Energy to continue to do business in PPL's service territory. Thus, the Commission's actions regarding the PPL's proposals will have a substantial impact on Direct Energy's future involvement in the market.

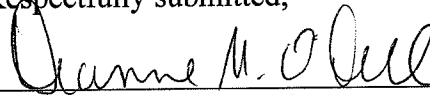
11. Direct Energy's intervention is in the public interest. As a member of the Centrica group of companies providing energy and energy related services through over 32 million customer relationships worldwide, Direct Energy has the experience and resources to aid

the Commission in carrying out its duties and responsibilities under the Electricity Generation Customer Choice and Competition Act to ensure that the goals of that Act are met. Accordingly, Direct Energy's participation in this proceeding is clearly in the public interest. See 52 Pa. Code § 5.72(a)(3).

12. At this time, Direct Energy continues to evaluate its position on the PPL's proposals and will refine its position based on further study of the proposals, review of discovery and additional input from other parties.

**WHEREFORE**, Direct Energy respectfully requests that the Commission grant its Petition to Intervene.

Respectfully submitted,



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Attorney ID 81064

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Date: June 4, 2012

Attorneys for Direct Energy Services, LLC