

Legal Department

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October 8, 2012

VIA eFiling

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street
P.O. Box 3265
Harrisburg, PA 17120

**Re: Petition of PPL Electric Utilities Corporation for Approval of its Long-Term
Infrastructure Improvement Plan,
Docket No. P-2012-2325034**

Dear Secretary Chiavetta:

Enclosed please find a Petition to Intervene on behalf of PECO Energy Company in the above referenced matter.

Copies of the Petition are being served as indicated on the attached Certificate of Service.

Please feel free to contact me directly if you have any questions or require additional information.

Very truly yours,



Jack R. Garfinkle

c: Per Certificate of Service

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**PETITION OF PPL ELECTRIC UTILITIES :
CORPORATION FOR APPROVAL OF ITS : DOCKET NO. P-2012-2325034
LONG-TERM INFRASTRUCTURE :
IMPROVEMENT PLAN :**

CERTIFICATE OF SERVICE

I hereby certify that I have this date served true and correct copies of the **Petition to Intervene of PECO Energy Company** upon the individuals listed below, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant):

VIA FIRST CLASS MAIL

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Respectfully submitted,

 CV

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Counsel for PECO Energy Company

October 8, 2012

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

PETITION OF PPL ELECTRIC UTILITIES CORPORATION FOR APPROVAL OF ITS LONG-TERM INFRASTRUCTURE IMPROVEMENT PLAN :
: **DOCKET NO. P-2012-2325034**
:

PETITION TO INTERVENE OF PECO ENERGY COMPANY

Pursuant to the provisions of 52 Pa. Code §§ 5.71-5.75, PECO Energy Company (“PECO” or the “Company”) hereby petitions to intervene in the above-captioned matter and, in support thereof, state as follows:

I. INTRODUCTION

1. On or about September 14, 2012, PPL Electric Utilities Corporation filed with the Pennsylvania Public Utility Commission (the “Commission”) a Petition for Approval of its Long-Term Infrastructure Improvement Plan. The Petition was filed pursuant to Act 11 of 2012 and the Commission’s August 2, 2012 Implementation Order at Docket No. M-2012-2293611. Act 11 of 2012, among other things, permits electric distribution companies (“EDCs”) to petition the Commission for approval to implement a Distribution System Improvement Charge (“DSIC”).

II. IDENTITY OF THE INTERVENING PARTY

2. PECO is a corporation organized and existing under the laws of the Commonwealth of Pennsylvania with its principal office in Philadelphia, Pennsylvania. PECO provides electric delivery service to approximately 1.6 million customers and natural gas delivery service to approximately 475,000 customers in Pennsylvania.

3. PECO will be represented in this proceeding by the following counsel, whose name and address should be placed on the Commission's service list and who should receive copies of all correspondence and other documents:

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III. INTEREST IN THIS PROCEEDING

4. Intervention in Commission proceedings is governed by the Commission's rule at 52 Pa. Code § 5.72, which provides, in pertinent part, that a person is eligible to intervene upon a showing that it 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 such other interest as to which participation "may be in the public interest."

5. The Company has a significant interest in this proceeding. While the Commission has recently entered a general implementation order regarding Act 11 of 2012, it is possible that the outcome of this proceeding could impact DSICs proposed by other EDCs in the future. While PECO does not intend to be an active participant in this proceeding, it will closely monitor the filings made by active parties and the Commission.

WHEREFORE, for all of the foregoing reasons, PECO Energy Company respectfully requests that its Petition to Intervene be granted and that the Commission grant such other relief as is just and reasonable under the circumstances.

Respectfully submitted,



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