

*Please reply to Harrisburg Office

October 17, 2013

VIA Electronic Filing

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

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

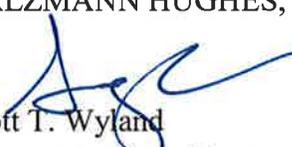
Dear Secretary Chiavetta:

Enclosed for filing with the Pennsylvania Public Utility Commission is the Petition to Intervene of Dauphin County Industrial Development Authority. All parties have been served with a copy of this document as shown on the Certificate of Service.

If you have any questions, please do not hesitate to contact me.

Very Truly Yours,

SALZMANN HUGHES, P.C.


Scott T. Wyland
*Counsel for Dauphin County Industrial
Development Authority*

STW/smk
Enclosure

cc: Honorable Susan D. Colwell, Administrative Law Judge
Honorable Joel H. Cheskis, Administrative Law Judge

Concentrating in Environmental, Land Use, Municipal, Real Estate, Corporate, Estate Planning and Administration, and General Civil Litigation

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**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of PPL Electric Utilities Corporation :
For Approval of a Default Service Program : P-2012-2302074
For the Period June 1, 2013 through May 31, 2015 :

**PETITION TO INTERVENE
OF THE DAUPHIN COUNTY INDUSTRIAL DEVELOPMENT AUTHORITY**

**TO: THE HONORABLE JOEL CHESKIS
THE HONORABLE SUSAN D. COLWELL**

Pursuant to 52 Pa. Code §§ 5.72-5.75, the Dauphin County Industrial Development Authority (“DCIDA”), by and through its counsel, Salzmann Hughes, P.C., petitions to intervene in the above-captioned matter. In support of its intervention, DCIDA states and avers as follows:

1. DCIDA is a current time-of-use (“TOU”) customer of PPL Electric Utilities Corporation (“PPL”).

2. DCIDA will be represented in this matter by:

Scott T. Wyland, Attorney ID # 52660
Salzmann Hughes, P.C.
105 N. Front Street, Suite 205
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DCIDA agrees to accept electronic service to the attorney listed above to be followed up with one hard copy of the documents served to the above-listed address.

3. On August 23, 2013, PPL filed a Petition for Approval of a New Pilot Time-of-Use Program in the above-captioned matter, Docket No. P-2012-2302074.

4. PPL’s Petition seeks the Commission’s approval of the terms and conditions of a new Pilot TOU program to replace its currently effective TOU rates.

5. The Commission's regulations permit intervention where a person has an interest in the proceeding that "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)(2). The regulations also permit participation of the person where it is in the public interest. 52 Pa. Code § 5.72(a)(3). "Person" includes governmental entities, municipalities, or other political subdivisions. 52 Pa. Code § 1.8.

6. As a current TOU customer that will be impacted by changes to PPL's TOU program, DCIDA has an "interest which may be directly affected" by the Commission's actions in this proceeding. 52 Pa. Code §5.72(a)(1).

7. DCIDA's interests in this matter are unique from and not adequately represented by other parties that may seek to intervene, including the individual electric generation suppliers that are presently parties to the proceeding.

8. DCIDA will be bound by the Commission's actions in this proceeding with respect to PPL's pilot TOU program and the structuring of the TOU program going forward.

9. DCIDA's intervention is in the public interest. As a current TOU customer, DCIDA has the experience to aid the Commission in determining whether PPL's proposal complies with all applicable legal and regulatory requirements.

10. DCIDA is continuing to evaluate the issues present in this matter and its position on PPL's proposal. DCIDA reserves the right to refine its position upon consideration of the testimony and discovery submitted going forward.

WHEREFORE, DCIDA respectfully requests that the Pennsylvania Public Utility Commission GRANT its Petition to Intervene in this matter.

Respectfully Submitted,

SALZMANN HUGHES, P.C.

Date: 10-17-13

By:  _____

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CERTIFICATE OF SERVICE

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

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Dated this 17th day of October, 2013


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