



Todd S. Stewart
Office: 717 236-1300 x242
Direct: 717 703-0806
tsstewart@hmslegal.com

100 North Tenth Street, Harrisburg, PA 17101 Phone: 717.236.1300 Fax: 717.236.4841 www.hmslegal.com

April 1, 2014

VIA ELECTRONIC FILING

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, Filing Room
Harrisburg, PA 17120

RE: Petition of PECO Energy Company For Approval of its Default Service Plan For
The Period June 1, 2015 through May 31, 2017; Docket No. P-2014-2409362;
PETITION TO INTERVENE OF INTERSTATE GAS SUPPLY, INC.

Dear Secretary Chiavetta:

Enclosed for filing with the Commission is the Petition to Intervene of 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 do not hesitate to contact my office.

Very truly yours,

Todd S. Stewart
*Counsel for Interstate Gas Supply, Inc. d/b/a
IGS Energy*

TSS/jld

Enclosure

cc: Administrative Law Judge Cynthia W. Fordham (via email and first-class mail)
Per Certificate of Service

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 52 Pa. Code § 1.54 (relating to service by a party).

VIA ELECTRONIC AND FIRST CLASS MAIL

Tanya J. McCloskey
Acting Consumer Advocate
Office of Consumer Advocate
555 Walnut Street
5th Floor Forum Place
Harrisburg, PA 17101
TMccloskey@paoca.org

John Evans, Esquire
Office of Small Business Advocate
Suite 1102 Commerce Building
300 North Second Street
Harrisburg, PA 17101
jorevan@pa.gov

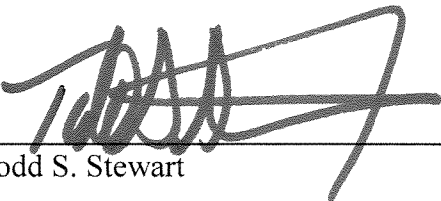
Johnnie E. Simms, Esquire
PA Public Utility Commission
Bureau of Investigation and Enforcement
Commonwealth Keystone Building
P.O. Box 3265
Harrisburg, Pa 17105-3265
josimms@pa.gov

Anthony Gay, Esquire
Exelon Business Services Company
2301 Market Street, S23-1
PO Box 8699
Philadelphia, PA 19101-8699
Anthony.gay@exeloncorp.com

Tori L. Giesler, Esquire
Lauren Lepkoski, Esquire
FirstEnergy Service Company
2800 Pottsville Pike
P.O. Box 16001
Reading, PA 19612-6001
Tgiesler@firstenergycorp.com
Llepkoski@firstenergycorp.com

Thomas P. Gadsden, Esquire
Kenneth M. Kulak, Esquire
Brooke E. McGlinn, Esquire
Morgan, Lewis, & Brockius LLP
1701 Market Street
Philadelphia, PA 19109-2921
tgadsden@morganlewis.com
kkulak@morganlewis.com
bmcglinn@morganlewis.com

Charis Mincavage, Esquire
McNees Wallace & Nurick, LLC
100 Pine Street
PO Box 1166
Harrisburg, PA 17108-1166
cmincavage@mwn.com



Todd S. Stewart

DATED: April 1, 2014

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

**Before Presiding Administrative Law Judge
Cynthia W. Fordham**

PETITION OF PECO ENERGY COMPANY :
FOR APPROVAL OF ITS DEFAULT : Docket No. P-2014-2409362
SERVICE PLAN FOR THE PERIOD :
JUNE 1, 2015 THROUGH MAY 31, 2017 :

**PETITION TO INTERVENE
OF INTERSTATE GAS SUPPLY, INC.**

NOW COMES Interstate Gas Supply, Inc. d/b/a IGS Energy (“IGS”) by and through its counsel in the above-captioned matter, Hawke McKeon & Sniscak, LLP, and hereby petitions to intervene in the above-captioned matter. IGS is an electricity and natural gas supplier and is licensed to provide electricity supply service in the service territory of PECO Energy Company and currently is providing service to customers in that territory. As such, it has a direct and immediate interest in the outcome of the above-captioned proceeding and will be bound by any Pennsylvania Public Utility Commission (“Commission”) action in this matter. Accordingly, IGS requests that its Petition to Intervene be granted, and in support thereof, states the following:

1. On or about March 10, 2014, PECO Energy Company filed the above-captioned Petition Seeking Approval of its Default Service Plan for the period June 1, 2015 through May 31, 2017.

2. IGS is represented in the above-captioned matter by the following counsel.

Todd S. Stewart
Attorney I.D. No. 75556
Hawke McKeon & Sniscak LLP
P.O. Box 1778
100 N. Tenth Street
Harrisburg, PA 17105-1778
Phone: (717) 236-1300
Fax: (717) 236-4841
Email: tsstewart@hmslegal.com

3. IGS is a licensed electric generation supplier (“EGS”) and provides service to customers in the PECO service territory. As such, it has a direct and immediate and substantial interest in the outcome of any proceeding regarding the provision of default service, since the rate for default service, also known as the price to compare (“PTC”) is the *de facto* competitive benchmark for electric generation suppliers in any particular Electric Distribution Company’s (“EDC’s”) service territory.

4. As an EGS serving customers in the PECO service territory, IGS will be bound by the action of the Commission in this proceeding. Moreover, IGS has an interest of such nature that no other petitioner in this case can represent its interest.

5. IGS’s interest satisfies the Commission’s regulations at 52 Pa. Code §5.72 and; therefore, its intervention should be granted.

6. IGS is currently in the process of reviewing PECO’s filing to determine what positions it will take on the issues raised by the PECO filing, and will identify those issues in sufficient time for the prehearing conference, which is currently scheduled to be held before The Presiding Administrative Law Judge for April 10, 2014.

WHEREFORE, IGS respectfully requests that its Petition to Intervene be granted and it be permitted full party status in the above-captioned proceeding.

Respectfully submitted,



Todd S. Stewart
PA Attorney I.D. #75556
Hawke McKeon & Sniscak LLP
100 North Tenth Street
P.O. Box 1778
Harrisburg, PA 17105-1778
E-mail: tstewart@hmslegal.com
Telephone: (717) 236-1300
Facsimile: (717) 236-4841
Counsel for IGS Energy

DATED: April 1, 2014