

**ECKERT  
SEAMANS**  
ATTORNEYS AT LAW

Eckert Seamans Cherin & Mellott, LLC  
213 Market Street  
8<sup>th</sup> Floor  
Harrisburg, PA 17101

TEL 717 237 6000  
FAX 717 237 6019  
www.eckertseamans.com

Sarah C. Stoner  
717.237.6026  
sstoner@eckertseamans.com

April 1, 2014

**Via Electronic Filing**

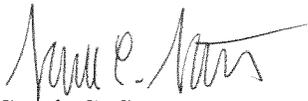
Rosemary Chiavetta, Secretary  
PA Public Utility Commission  
PO Box 3265  
Harrisburg, PA 17105-3265

Re: Petition of PECO Energy Company for approval of its Default Service Program for the period from June 1, 2015 through May 31, 2017; Docket No. P-2014-2409362

Dear Secretary Chiavetta:

Enclosed please find the Retail Energy Supply Association's Petition to Intervene. All parties have been served in accordance with the attached Certificate of Service.

Sincerely,



Sarah C. Stoner

SCS/dsc

Enclosure

cc: Hon. Cynthia Fordham w/enc.  
Cert. of Service w/enc.

**CERTIFICATE OF SERVICE**

I hereby certify that I have this day served a true copy of the Retail Energy Supply Association's Petition to Intervene upon the participants listed below in accordance with the requirements of § 1.54 (relating to service by a participant).

**VIA EMAIL AND FIRST CLASS MAIL**

Johnnie E. Simms  
Chief Prosecutor  
PA Public Utility Commission  
Commonwealth Keystone Building  
400 North Street, 2nd Floor  
Harrisburg, PA 17120  
[josimms@pa.gov](mailto:josimms@pa.gov)

John Evans, Esquire  
Elizabeth Rose Triscari, Esquire  
Office of Small Business Advocate  
300 North Second Street, Suite 1102  
Harrisburg, PA 17101  
[jorevan@pa.gov](mailto:jorevan@pa.gov)  
[ETriscari@pa.gov](mailto:ETriscari@pa.gov)

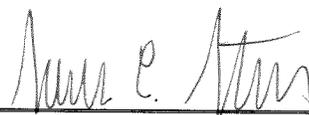
Tanya J. McCloskey, Esquire  
Aron Beatty, Esquire  
Office of Consumer Advocate  
555 Walnut Street, 5<sup>th</sup> Fl.  
Harrisburg, PA 17101-1923  
[tmccloskey@paoca.org](mailto:tmccloskey@paoca.org)  
[abeatty@paoca.org](mailto:abeatty@paoca.org)

Stephen L. Huntoon  
NextEra Energy Resources, LLC  
801 Pennsylvania Avenue, N.W., Suite 220  
Washington, D.C. 20004  
[shuntoon@nexteraenergy.com](mailto:shuntoon@nexteraenergy.com)

Anthony E. Gay, Esquire  
PECO Energy Company  
2301 Market Street  
P.O. Box 8699  
Philadelphia, PA 19103  
[Anthony.gay@exeloncorp.com](mailto:Anthony.gay@exeloncorp.com)

Thomas P. Gadsden, Esquire  
Kenneth M. Kulak, Esquire  
Brooke E. McGlinn, Esquire  
Morgan, Lewis & Bockius LLP  
1701 Market Street  
Philadelphia, PA 19103-2921  
[tgadsden@morganlewis.com](mailto:tgadsden@morganlewis.com)  
[kkulak@morganlewis.com](mailto:kkulak@morganlewis.com)  
[bmcglinn@morganlewis.com](mailto:bmcglinn@morganlewis.com)

Charis Mincavage  
McNees Wallace & Nurick LLC  
100 Pine Street  
P.O. Box 1166  
Harrisburg, P A 17108  
[cmincavage@mwn.com](mailto:cmincavage@mwn.com)



Sarah C. Stoner, Esq.

Dated: April 1, 2014

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of PECO Energy Company for : Docket No. P-2014-2409362  
approval of its Default Service Program :  
for the period from June 1, 2015 through :  
May 31, 2017 :

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**THE RETAIL ENERGY SUPPLY ASSOCIATION'S PETITION TO INTERVENE**

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Pursuant to 52 Pa. Code §§ 5.72-5.75 and the public notice published in the Pennsylvania Bulletin on March 22, 2014, the Retail Energy Supply Association (“RESA”)<sup>1</sup> petitions to intervene in the Petition of PECO Energy Company (“PECO or Company”) for approval of its Default Service Program (“DSP Petition”). In support of its intervention, RESA states as follows:

1. On March 10, 2014, PECO filed a petition proposing to establish the terms and conditions under which it will procure default service supplies, meet its default service obligations and recover all associated costs on a full and current basis for the period from June 1, 2015 through May 31, 2017. This is PECO’s third proposed program for default service under Pennsylvania’s Electricity Generation Customer Choice and Competition Act, 66 Pa. C.S. §§ 2801-2812.

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<sup>1</sup> RESA’s members include: AEP Energy, Inc.; Champion Energy Services, LLC; ConEdison Solutions; Constellation NewEnergy, Inc.; Direct Energy Services, LLC; GDF SUEZ Energy Resources NA, Inc.; Homefield Energy; IDT Energy, Inc.; Integrys Energy Services, Inc.; Interstate Gas Supply, Inc. dba IGS Energy; Just Energy; Liberty Power; MC Squared Energy Services, LLC; Mint Energy, LLC; NextEra Energy Services; Noble Americas Energy Solutions LLC; NRG Energy, Inc.; PPL EnergyPlus, LLC; Stream Energy; TransCanada Power Marketing Ltd. and TriEagle Energy, L.P. The comments expressed in this filing represent the position of RESA as an organization but may not represent the views of any particular member of RESA.

2. Notice of the DSP Petition was published in the *Pennsylvania Bulletin* on March 22, 2014. That notice required that formal protests, petitions to intervene and answers to the DSP Petition be filed by April 1, 2014.

3. RESA is a trade association of power marketers, independent power producers, and a broad range of companies within the Mid-Atlantic marketplace, each of whom support the electric services industry and seek to develop a more competitive power industry. RESA members are licensed to sell electric energy in the markets of Pennsylvania's major EDCs, including the service territory of PECO.

4. RESA's attorneys in this matter are:

Daniel Clearfield, Esquire  
Deanne M. O'Dell, Esquire  
Sarah C. Stoner, Esquire  
Eckert Seamans Cherin & Mellott, LLC  
213 Market St., 8th Floor  
P.O. Box 1248  
Harrisburg, PA 17101  
717.237.6000  
Fax 717.237.6019  
dclearfield@eckertseamans.com  
dodell@eckertseamans.com  
sstoner@eckertseamans.com

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. RESA meets the standards for intervention set forth in 52 Pa. Code § 5.72(a). As an organization whose members include competitive electric generation suppliers (“EGSs”) licensed to do business in PECO’s service territory, RESA has interests that will be directly affected by this proceeding. The ability of RESA’s members to provide electric supply to retail customers in PECO’s service territory will be specifically and substantially affected by the outcome of this proceeding, which will establish the terms and conditions under which PECO will acquire electric supply to serve its Default Service load from June 1, 2015 through May 31, 2017 and, thus, the rates against which RESA members must compete to sell electricity to retail customers in PECO’s service territory. In addition, the DSP Petition addresses various retail market enhancement including the proposal to continue the EGS Standard Offer Program as well as its future implementation plans to implement seamless moves, instant connect and a new account number access feature. EGS input regarding all of these issues is appropriate and reasonable.

7. RESA’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 the PECO service territory in particular. This is because RESA represents the interests of a diverse and broad group of electric generation suppliers in general, and not the interests of any individual member.

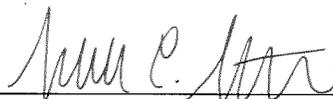
8. RESA’s members will be bound by the action of the Commission in this proceeding, which will determine PECO’s default service rates, terms and conditions for beginning June 2015 as well as the terms and conditions for the various retail market enhancement programs proposed by the Company.

9. RESA's intervention is in the public interest. RESA's participation will enable it to contribute the unique perspectives and insights of a trade association representing multiple EGSs and complete presentation of the issues to be addressed in this proceeding. It should be noted that RESA actively participated in the most recent default service proceeding that developed the current default service plan for PECO as well as prior default service proceedings involving the Company.

10. Due to the early stage of this proceeding, RESA reserves the right to raise and address issues identified through its continued review and analysis of PECO's DSP Petition (and related information), or other issues raised by other parties.

**WHEREFORE**, RESA respectfully requests that the Commission grant RESA's Petition to Intervene.

Respectfully submitted,



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Daniel Clearfield, Esquire

Attorney ID 26183

Deanne M. O'Dell, Esquire

Attorney ID 81064

Sarah C. Stoner, Esquire

Attorney ID 313793

Eckert Seamans Cherin & Mellott, LLC

213 Market St., 8th Floor

Harrisburg, PA 17101

717.237.6000

Fax 717.237.6019

Date: April 1, 2014

Attorneys for Retail Energy Supply Association