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April 1, 2014

VIA ELECTRONIC FILING

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

**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 for filing on behalf of the PECO Energy Suppliers Group ("PESG") is its Petition to Intervene in the above-captioned matter. This document has been e-filed at the Pennsylvania Public Utility Commission's website. Copies have been served in accordance with the attached Certificate of Service.

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

Best Regards,

STEVENS & LEE



Michael A. Gruin

Encl.

cc: Honorable Cynthia Fordham, Administrative Law Judge
Certificate of Service

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A PROFESSIONAL CORPORATION

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of PECO Energy Company for Approval :
of its Default Service Program For the Period From : Docket No. P-2014-2409362
June 1, 2015 through May 31, 2017 :

PETITION TO INTERVENE OF
THE PECO ENERGY SUPPLIERS GROUP

Pursuant to 52 Pa. Code §§ 5.71 et seq., the PECO Energy Suppliers Group (“PESG”) hereby files this Petition to Intervene in the above-captioned proceeding. In support of this Petition, PESG states as follows:

1. On March 10, 2014, PECO Energy Company (“PECO”) filed a Petition for Approval of its Default Service Programs for the period of June 1, 2015 through May 30, 2017. The Petition was filed pursuant to Section 2807(e) of the Public Utility Code.
2. By notice published in the Pennsylvania Bulletin on March 22, 2014, the Pennsylvania Public Utility Commission (“Commission”) directed that formal protests and Petitions to Intervene must be filed no later than April 1, 2014.
3. PESG is an ad hoc group of electricity generation suppliers (“EGSs”) licensed to serve customers in PECO territory. PESG’s members will be identified on an Appendix that will be submitted prior to the prehearing conference in this matter. As necessary, PESG will update Appendix A during the course of this proceeding as needed to reflect any changes in membership.
4. PESG is represented in the above-captioned matter by the following counsel:

Michael A. Gruin, Esq.
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5. The Commission's regulations at 52 Pa. Code § 5.72(a) provide that "A petition to intervene may be filed by a person claiming a right to intervene or an interest of such nature that intervention is necessary or appropriate to the administration of the statute under which the proceeding is brought. The right or interest may be one of the following:

- (1) A right conferred by statute of the United States or of the Commonwealth.
- (2) 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.
- (3) Another interest of such nature that participation of the petitioner may be in the public interest."

6. PESG clearly meets the standard for intervention. The Default Service Plan proposed in this proceeding includes several proposals that will directly impact PESG members, including PECO's proposal for procuring default supply for its various customer rate classes, its proposal for periodic reconciliation of its default service rates, and its proposals for various retail market enhancements and associated cost recovery for those enhancements.

7. As EGSs operating in PECO's service territory, PESG members will be directly impacted by the final structure of the Default Service Plan and the retail market enhancement programs that PECO is proposing. PESG also seeks to participate to ensure that the PECO Default Service Plan complies with any further directives that the Commission may issue regarding the structure of default service plans.

8. The interests of PESG are not represented by any other participant in this proceeding, the outcome of which will be binding upon PESG members. While other EGSs will

likely intervene in this proceeding, EGSs are not uniform in their position on the variety of issues involved in the Default Service Plan. PESG members have views on issues that differ from other EGSs, and unless PESG is permitted to intervene, such views will not be represented in this proceeding.

9. Because PESG has a direct and substantial interest in this proceeding, and because no other entity can represent PESG's interests, PESG's Petition to Intervene should be granted.

10. Because this proceeding is still in its preliminary stages, PESG is still in the process of formulating its positions on the proposed Default Service Plan. PESG will finalize its positions on the various issues in this proceeding after reviewing the testimony and the other materials to be provided by PECO and the other intervenors.

WHEREFORE, the PECO Energy Suppliers Group respectfully requests that its Petition to Intervene be granted and that it be accorded full party status in the above-captioned proceeding.

Respectfully submitted,

STEVENS & LEE, P.C.



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Attorneys for
PECO Energy Suppliers Group

Dated: April 1, 2014

APPENDIX A

Pennsylvania Energy Marketers Group

TO BE PROVIDED

CERTIFICATE OF SERVICE

I hereby certify that I have this day served by First Class U.S. Mail and Electronic Mail a true and correct copy of the foregoing Petition upon the parties listed below, in accordance with the requirements of § 1.54 (relating to service by a party)

Anthony Gay, Esq. Exelon Business Services 2301 Market St., S23-1 PO Box 8699 Philadelphia, PA 19101-8699	Thomas P. Gadsden, Esq. Kenneth Kulak, Esq. Brooke E. McGlenn, Esq. Morgan Lewis & Bockius LLP 1701 Market Street Philadelphia, PA 19103-2921
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April 1, 2014

Michael A. Gruin, Esq.