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May 30, 2014

**Via Electronic Filing**

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

Re: Petition of PPL Electric Utilities Corporation for Approval of a Default Service Program  
and Procurement Plan for the Period June 1, 2015 through May 31, 2017,  
Docket No. P-2014-2417907

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Dear Secretary Chiavetta:

Enclosed for electronic filing please find the Retail Energy Supply Association's ("RESA")  
Petition to Intervene with regard to the above-referenced matter. Copies to be served in  
accordance with the attached Certificate of Service.

Sincerely,



Deanne M. O'Dell

DMO/lww  
Enclosure

cc: Hon. Susan D. Colwell, w/enc.

**CERTIFICATE OF SERVICE**

I hereby certify that this day I served a copy of RESA's Petition to Intervene upon the persons listed below in the manner indicated in accordance with the requirements of 52 Pa. Code Section 1.54.

**Via Email and/or First Class Mail**

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Date: May 30, 2014

  
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Deanne M. O'Dell, Esq.

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of PPL Electric Utilities : Docket No. P-2014-2417907  
Corporation for Approval of its Default :  
Service Program and Procurement Plan :  
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 May 10, 2014 at 44 Pa.B. 2832, the Retail Energy Supply Association (“RESA”)<sup>1</sup> petitions to intervene in the Petition of PPL Electric Utilities Corporation (“PPL” or Company”) for approval of its Default Service Program and Procurement Plan for the Period of June 1, 2015 through May 31, 2017 (“DSP Petition”). In support of its intervention, RESA states as follows:

1. On April 18, 2014, PPL filed a petition proposing to establish the terms and conditions under which it will acquire and supply default service from June 1, 2015 through May 31, 2017. PPL’s proposal consists of a competitive procurement proposal, an implementation plan, a proposed rate design, including a Time-of-Use (“TOU”) rate option, a proposal to continue and expand the current Standard Offer Referral Program and a contingency plan.

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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 May 10, 2014. That notice required that formal protests, petitions to intervene and answers to the DSP Petition be filed by May 30, 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 PPL.

4. RESA's attorneys in this matter are:

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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 PPL’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 PPL’s service territory will be specifically and substantially affected by the outcome of this proceeding, which will establish the terms and conditions under which PPL will acquire electric supply to serve its Default Service load from June 1, 2015 through May 31, 2017. The procurement plan will impact the default service generation rate. The default service generation rate is a consideration of EGSs when pricing their own competitive generation supply offers to retail customers. In addition, the DSP Petition addresses the proposal to continue the Standard Offer Customer Referral Program. 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 PPL 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 PPL’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.

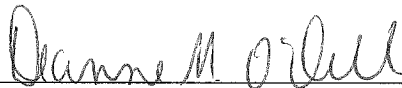
9. RESA’s intervention is in the public interest. RESA’s participation will enable it to contribute the unique perspectives and insights of a trade association representing multiple

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 PPL 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 PPL'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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Date: May 30, 2014

Attorneys for Retail Energy Supply Association