

Daniel Clearfield
717.237.7173
dclearfield@eckertseamans.com

November 9, 2015

VIA E-FILING

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

**Re: Pennsylvania Public Utility Commission v. PECO Energy Company – Electric
Division Docket No. R-2015-2468981**

Dear Secretary Chiavetta:

This letter is submitted on behalf of KEEA Energy Education Fund (“KEEF”) in response to the Recommended Decision of Administrative Law Judge Angela T. Jones issued in the above-reference proceeding on October 28, 2015. The Recommended Decision approves the Joint Petition for Settlement of Rate Investigation (“Joint Petition”) but modifies the provision establishing a revenue decoupling collaborative. The parties agreed in Paragraph 25 of the Joint Petition that PECO will hold a revenue decoupling collaborative open to all interested participants on or before March 1, 2016. ALJ Jones proposed to expand the revenue decoupling collaborative to include all EDCs and NGDCs in the Commonwealth of Pennsylvania. ALJ Jones suggested that the Office of Competitive Market Oversight be directed to lead the collaborative and provide a report to the Pennsylvania Public Utility Commission (“Commission”) in six month intervals.

While KEEF generally supports a statewide revenue decoupling collaborative, it cannot support the recommendation in the Recommend Decision. As set forth in the Joint Petition, KEEF participated in the negotiations that resulted in a settlement that reflects a PECO-specific collaborative. Therefore, KEEF supports the Joint Petition and does not believe it would be appropriate for the Commission to take action in this proceeding that diverged from this settlement term.

Please contact me if you have any questions or concerns about this filing. Copies to be served in accordance with the attached Certificate of Service.

Sincerely,

A handwritten signature in cursive script that reads "Daniel Clearfield". The signature is written in dark ink and is positioned above the printed name.

Daniel Clearfield

Counsel for KEEA Energy Education Fund

cc: Cert. of Service
Cheryl Walker Davis, Office of Special Assistants

CERTIFICATE OF SERVICE

I hereby certify that this day I served, on behalf of KEEA Energy Education Fund, a copy of the foregoing document, upon the persons listed below in the manner indicated in accordance with the requirements of 52 Pa. Code § 1.54.

Via Email and/or First Class Mail

Jennedy S. Johnson, Esquire
Colin Scott, Esquire
Phillip Kirchner, Esquire
Bureau of Investigation & Enforcement
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17120
jennejohns@pa.gov
colinScott@pa.gov
phikirchne@pa.gov

Aron J. Beatty, Esquire
Christy M. Appleby, Esquire
Brandon J. Pierce, Esquire
Office of Consumer Advocate
555 Walnut Street
5th Floor, Forum Place
Harrisburg, PA 17101-1923
abeatty@paoca.org
cappleby@paoca.org
bpierce@paoca.org

J. Barry Davis, Esquire
Scott J. Schwarz, Esquire
Jocelyn G. Hill, Esquire
City of Philadelphia Law Department
1515 Arch Street, 16th Floor
Philadelphia, PA 19102
j.barry.davis@phila.gov
scott.schwarz@phila.gov
jocelyn.g.hill@phila.gov

Daniel G. Asmus, Esquire
Elizabeth Rose Triscari, Esquire
Office of Small Business Advocate
Commerce Tower, Suite 202
300 North Second Street
Harrisburg, PA 17101
dasmus@pa.gov
etriscari@pa.gov

Charis Mincavage, Esquire
Adeolu Bakare, Esquire
Elizabeth Trinkle, Esquire
McNees Wallace & Nurick LLC
P.O. Box 1166
100 Pine Street
Harrisburg, PA 17108-1166
cmincavage@mwn.com
abakare@mwn.com
etrinkle@mwn.com

Thu B. Tran, Esquire
Robert W. Ballenger, Esquire
Josie Pickens, Esquire
Community Legal Services, Inc.
1424 Chestnut Street
Philadelphia, PA 19102
ttran@clsphila.org
rballenger@clsphila.org
jpickens@clsphila.org

Kathleen Barksdale, Esquire
Julie Holvik, Esquire
Assistant Regional Counsel
General Services Administration
The Strawbridge Building, Suite 9088
20 North Eighth Street
Philadelphia, PA 19107
kathleen.barksdale@gsa.gov
julie.holvik@gsa.gov

Joseph Otis Minott, Esquire
The Alliance for Solar Choice
Ernest Logan Welde, Esquire
Benjamin Z. Hartung, Esquire
Clean Air Council
135 South 19th Street, Suite 300
Philadelphia, PA 19103
joe_minott@cleanair.org
lwelde@cleanair.org
bhartung@cleanair.org

Thomas P. Gadsden, Esquire
Anthony C. DeCusatis, Esquire
Catherine G. Vasudevan, Esquire
Brooke E. McGlinn, Esquire
Morgan, Lewis & Bockius LLP
1701 Market Street
Philadelphia, PA 19103
tgadsden@morganlewis.com
adecusatis@morganlewis.com
cvasudevan@morganlewis.com
bmclinn@morganlewis.com

Jacob J. Schlesinger, Esquire
Keys, Fox & Wiedman LLP
1400 16th Street
16 Market Square, Suite 400
Denver, CO 80202
jschlesinger@kfwlaw.com

David R. Wooley, Esquire
Keys, Fox & Wiedman LLP
436 14th Street, Suite 1305
Oakland, CA 94612
dwooley@kfwlaw.com

Patrick M. Cicero, Esquire
Elizabeth R. Marx, Esquire
Pennsylvania Utility Law Project
118 Locust Street
Harrisburg, PA 17101
pulp@palegalaid.net

Leonard E. Lucas, III, Esquire
Senior Assistant General Counsel
General Service Administration
801 Broadway, Suite 113
Nashville, TN 37203
leonard.lucas@gsa.gov

W. Craig Williams, Esquire
Romulo L. Diaz Jr., Esquire
Jack R. Garfinkle, Esquire
PECO Energy Company
2301 Market Street
P.O. Box 8699
Philadelphia, PA 19101
Craig.Williams@exeloncorp.com
romulo.diaz@exeloncorp.com
jack.garfinkle@exeloncorp.com

Mark C. Szybist, Esquire
Natural Resources Defense Council
1152 15th Street NW
Suite 300
Washington, DC 20005
mszybist@nrdc.org

William Kazimer
3121 West Germantown Pike
Eagleville, PA 19043

Date: November 9, 2015


Daniel Clearfield, Esquire