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ExGen's attorney is authorized to accept service on behalf of ExGen in this proceeding. ExGen requests that the Commission and all parties of record serve copies of all discovery requests and answers, correspondence, Commission Orders and any other documents issued on both ExGen and its attorney. Particularly, ExGen respectfully requests that service (both electronic and paper) be made to its counsel of record, H. Rachel Smith while an electronic courtesy copy, if possible, be served on Lael Campbell at [lael.campbell@constellation.com](mailto:lael.campbell@constellation.com).

3. On January 29, 2016, PPL Electric Utilities Corporation ("PPL") filed a Petition for Approval of a Default Service Program and Procurement Plan for the period June 1, 2017 through May 31, 2021 ("Plan").

4. ExGen is an indirect, wholly-owned subsidiary of Exelon Corp., a North American energy company with several merchant subsidiaries in addition to ExGen, as well as regulated utility subsidiaries in Pennsylvania (PECO Energy Company), Illinois (Commonwealth Edison Company) and Maryland (Baltimore Gas and Electric Company). ExGen has been granted market-based rate authority by the Federal Energy Regulatory Commission and is a buyer and seller of wholesale electricity and capacity.

5. ExGen provides wholesale power and risk management services to wholesale customers (including, but not limited to, distribution utilities, co-ops, municipalities, power marketers, utilities and other large load serving entities), including through participation in wholesale load procurements, in both regulated and restructured energy markets. ExGen is a licensed participant in PJM Interconnection, L.L.C.

6. As a potential supplier of wholesale power in PPL's territory, ExGen falls squarely within the test articulated for intervention in this proceeding: simply put, ExGen possesses "[a]n 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." Pa. Code § 5.72(a)(1).

7. The Plan presents fundamental issues which affect the ability of ExGen, and suppliers like it, to compete in the Commonwealth's electricity market. The public interest demands that ExGen be afforded the opportunity to be heard in this proceeding. See Pa. Code § 5.72(a)(3).

8. In summary, ExGen has a direct and substantial interest in the outcome of this proceeding as a potential wholesale supplier in the Joint Applicants' territories. No other party can adequately represent ExGen's interests in this matter. Moreover, it is in the public interest that ExGen be permitted to participate in this proceeding.

9. Due to the early stage of this proceeding, ExGen is still formulating its position on the proposed Plan and will finalize its position after it has had an opportunity to further study and evaluate the filings, conduct discovery and obtain additional information as necessary.

WHEREFORE, for all the foregoing reasons, Exelon Generation Company, LLC respectfully requests that its Petition to Intervene be granted and that the Commission grant it such other relief as is just and reasonable under the circumstances.

Respectfully submitted,

/s/ H. Rachel Smith  
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*Counsel to Intervenor Exelon Generation Company,  
LLC.*

Dated: March 3, 2016

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**Petition of PPL Electric Utilities  
Corporation for Approval of a Default  
Service Program and Procurement Plan  
for the Period June 1, 2017 through May  
31, 2021**

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**P-2016-2526627**

**VERIFICATION**

I, Holly Rachel Smith, Assistant General Counsel to Exelon Business Services Company hereby attest that all the facts contained in this petition to intervene and prehearing memo in the above-referenced proceeding are true and correct to the best of my knowledge.



Dated: March 3, 2016