

COMMONWEALTH OF PENNSYLVANIA



OFFICE OF CONSUMER ADVOCATE

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June 20, 2016

Rosemary Chiavetta, Secretary
PA Public Utility Commission
Commonwealth Keystone Bldg.
400 North Street
Harrisburg, PA 17120

Re: Petition of PECO Energy Company for
(1) Approval of its Microgrid Integrated Technology
Pilot Plan and (2) Issuance of a Declaratory Order
Regarding the Recovery of Microgrid Costs
Docket No. P-2016-2546452

Application for Construction of Microgrid
Distribution Energy Resources Fueled by Natural Gas
Docket No. A-2016-2546450

Dear Secretary Chiavetta:

Attached for electronic filing please find the Office of Consumer Advocate's Answer,
Notice of Intervention, and Public Statement in the above-referenced proceeding.

Copies have been served per the attached Certificate of Service.

Respectfully submitted,

/s/ Lauren M. Burge
Lauren M. Burge
Assistant Consumer Advocate
PA Attorney I.D. 311570

Attachment

cc: Honorable Cynthia Williams Fordham, ALJ
Honorable Eranda Vero, ALJ
Certificate of Service

222679

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Petition of PECO Energy Company for	:	
(1) Approval of its Microgrid Integrated	:	
Technology Pilot Plan and (2) Issuance of	:	Docket No. P-2016-2546452
A Declaratory Order Regarding the	:	
Recovery of Microgrid Costs	:	
	:	
Application for Construction of Microgrid	:	
Distribution Energy Resources fueled by	:	Docket No. A-2016-2546450
Natural Gas	:	

NOTICE OF INTERVENTION

Pursuant to 52 Pa. Code Sections 5.71-74, the Office of Consumer Advocate hereby gives Notice of Intervention in the above-captioned proceeding. A copy of all correspondence and notices, documents, orders or other communications with respect to the above-captioned proceeding should be addressed to the following:

Aron J. Beatty
Senior Assistant Consumer Advocate
PA Attorney I.D. # 86625
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Darryl Lawrence
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PA Attorney I.D. # 93682
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Respectfully Submitted,

/s/ Lauren M. Burge
Lauren M. Burge
Assistant Consumer Advocate
PA Attorney I.D. # 311570

DATE: June 20, 2016

PUBLIC STATEMENT OF THE
OFFICE OF CONSUMER ADVOCATE
PURSUANT TO 71 P.S. SECTION 309-4(e)

Act 161 of the Pennsylvania General Assembly, 71 P.S. Section 309-2, as enacted July 9, 1976, authorizes the Consumer Advocate to represent the interests of consumers before the Pennsylvania Public Utility Commission (Commission). In accordance with Act 161, and for the following reasons, the Acting Consumer Advocate determined to file an Answer and Intervene in the proceedings before the Commission involving PECO Energy Company (PECO or Company).

On May 18, 2016, PECO filed a Petition for approval of its Microgrid Integrated Technology Pilot Plan (Microgrid Pilot) and for issuance of a Declaratory Order regarding the recovery of microgrid costs. The Company also filed a related Application for Construction of Microgrid Distribution Energy Resources fueled by Natural Gas, in accordance with 66 Pa. C.S. § 519. In its Petition, PECO proposes to construct, own and operate a community microgrid within its service territory, in Concord Township. The Petition states that the microgrid will generally operate as part of PECO's distribution system but will be able separate itself from the distribution system to operate in "island mode," providing uninterrupted service within the microgrid during outages, severe storms, or other events. When operating in island mode, power within the microgrid will be provided by natural gas reciprocating engines, ground-mounted solar photovoltaic installations, batteries, and electric vehicle charging stations. The Company estimates that the Microgrid Pilot will cost approximately \$35 million to implement, which it proposes to recover from all PECO customers. PECO proposes to recover any eligible costs through its Distribution System Improvement Charge (DSIC), and to recover the remaining costs through a future distribution base rate proceeding.

The Acting Consumer Advocate determined to intervene in this proceeding to protect the interests of PECO's residential customers. The Acting Consumer Advocate will seek to ensure that PECO's Microgrid Pilot is legal and reasonable, and that any costs incurred are just and reasonable and otherwise consistent with Pennsylvania law.

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Petition of PECO Energy Company for	:	
(1) Approval of its Microgrid Integrated	:	
Technology Pilot Plan and (2) Issuance of	:	Docket No. P-2016-2546452
A Declaratory Order Regarding the	:	
Recovery of Microgrid Costs	:	
	:	
Application for Construction of Microgrid	:	
Distribution Energy Resources fueled by	:	Docket No. A-2016-2546450
Natural Gas	:	

I hereby certify that I have this day served a true copy of the following documents, the Office of Consumer Advocate's Answer, Notice of Intervention, and Public Statement, upon parties of record in this proceeding in accordance with the requirements of 52 Pa. Code Section 1.54 (relating to service by a participant), in the manner and upon the persons listed below:

Dated this 20th day of June 2016.

SERVICE BY HAND DELIVERY and FIRST CLASS MAIL

Phillip C. Kirchner, Esquire
Bureau of Investigation & Enforcement
400 North Street
Harrisburg, PA 17120

SERVICE BY E-MAIL and FIRST CLASS MAIL

Michael S. Swerling, Esquire
PECO Energy Company
2301 Market Street
Philadelphia, PA 19103

Elizabeth Rose Triscari, Esquire
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300 North Second Street, Suite 202,
Harrisburg, PA 17101

Kenneth M. Kulak, Esquire
Morgan, Lewis & Bockius
1701 Market Street
Philadelphia, PA 19103
PECO Energy

/s/ Lauren M. Burge

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