

COMMONWEALTH OF PENNSYLVANIA



OFFICE OF CONSUMER ADVOCATE

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September 23, 2020

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

Re: Tenant Union Representative Network
v.
PECO Energy Company
Docket No. C-2020-3021557

Dear Secretary Chiavetta:

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

Copies have been served per the attached Certificate of Service.

Respectfully submitted,

/s/ Christy M. Appleby
Christy M. Appleby
Assistant Consumer Advocate
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Enclosures:

cc: Office of Administrative Law Judge (**email only**)
Office of Special Assistants (**email only**: ra-OSA@pa.gov)
Bureau of Technical Utility Services (**email only**)
Certificate of Service

*296658

CERTIFICATE OF SERVICE

Re: Tenant Union Representative Network :
v. : Docket No. C-2020-3021557
PECO Energy Company :

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

Dated this 23rd day of September 2020.

SERVICE BY E-MAIL ONLY

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Dated: September 23, 2020
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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. § 309-2, as enacted July 9, 1976, authorizes the Consumer Advocate to represent the interests of consumers before the Pennsylvania Public Utility Commission (PUC or Commission). In accordance with Act 161, and for the following reasons, the Acting Consumer Advocate determined to file a Notice of Intervention and Answer, and to participate in proceedings before the Commission involving the Complaint of the Tenant Union Representative Network (TURN) against PECO Energy Company (PECO) at Docket No. C-2020-3021557.

On August 25, 2020, TURN filed a Formal Complaint regarding PECO's compliance with the Joint Petition for Settlement in the matter of PECO Energy Company Universal Service and Energy Conservation Plan 2013-2015 at Docket No. M-2012-2290911 (Settlement). In its Formal Complaint, TURN argues that PECO is not in compliance with the Settlement because PECO did not change the energy burdens used to calculate its Fixed Credit Option (FCO) upon the issuance of the November 5, 2019 CAP Policy Statement Order at Docket No. M-2019-3012599. Formal Complaint at ¶¶ 73, 80-82. On September 14, 2020, the Coalition for Affordable Utility Service and Energy Efficiency in Pennsylvania (CAUSE-PA) filed a Petition to Intervene and Answer, and on September 15, 2020, PECO filed its Answer.

The OCA was a signatory to the Settlement at Docket No. M-2012-2290911 and is an interested party in this proceeding. The objective of the Acting Consumer Advocate in intervening in this case is to protect the interests of consumers in PECO's service territory. The OCA will seek to ensure that any changes to PECO's Customer Assistance Program (CAP) sought are consistent with the Settlement, Commission regulations, statutes and applicable case law and in the public interest.