



COMMONWEALTH OF PENNSYLVANIA

December 21, 2020

**E-FILED**

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

**Re: Petition of PECO Energy Company for Approval of Its Act 129 Phase IV Energy Efficiency and Conservation Plan / Docket No. M-2020-3020830**

Dear Secretary Chiavetta:

Enclosed please find the Notice of Intervention, Public Statement, and Verification, on behalf of the Office of Small Business Advocate (“OSBA”), in the above-captioned proceeding.

Copies will be served on all known parties in this proceeding, as indicated on the attached Certificate of Service.

If you have any questions, please do not hesitate to contact me.

Sincerely,

/s/ Steven C. Gray

Steven C. Gray  
Senior Supervising  
Assistant Small Business Advocate  
Attorney I.D. No. 77538

*Enclosures*

cc: Robert D. Knecht  
Parties of Record

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**Petition of PECO Energy Company for** :  
**Approval of Its Act 129 Phase IV Energy** : **Docket No. M-2020-3020830**  
**Efficiency and Conservation Plan** :  
:

**NOTICE OF INTERVENTION  
OF THE OFFICE OF SMALL BUSINESS ADVOCATE**

The Office of Small Business Advocate (“OSBA”) files this Notice of Intervention with respect to the Petition for Approval of Its Act 129 Phase IV Energy Efficiency and Conservation Plan (“*Petition*”) that was filed with the Pennsylvania Public Utility Commission (“Commission”) on November 30, 2020, by PECO Energy Company (“PECO” or the “Company”). In support of this Intervention, the OSBA avers, as follows:

1. The OSBA is an agency of the Commonwealth of Pennsylvania authorized by the Small Business Advocate Act (Act 181 of 1988, 73 P.S. §§ 399.41 – 399.50) to represent the interests of small business customers as a party in proceedings before the Commission.
2. Intervention in this case is necessary to ensure that the interests of small business customers served by PECO are adequately represented.

3. Representing the OSBA in this proceeding is:

Steven C. Gray, Esquire  
Office of Small Business Advocate  
555 Walnut Street  
Forum Place, 1<sup>st</sup> Floor  
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Respectfully Submitted,

/s/ Steven C. Gray  
Steven C. Gray  
Senior Supervising  
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Attorney I.D. No. 77538

For:  
John R. Evans  
Small Business Advocate

Office of Small Business Advocate  
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Harrisburg, PA 17101  
(717) 783-2525

Dated: December 21, 2020

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

<b>Petition of PECO Energy Company for</b>	:	<b>Docket Nos. M-2020-3020830</b>
<b>Approval of Its Act 129 Phase IV Energy</b>	:	
<b>Efficiency and Conservation Plan</b>	:	

**PUBLIC STATEMENT OF THE  
OFFICE OF SMALL BUSINESS ADVOCATE**

The Small Business Advocate is authorized and directed to represent the interest of small business consumers of utility services in Pennsylvania under the provisions of the Small Business Advocate Act, Act 181 of 1988, 73 P.S. §§ 399.41 - 399.50 (“Act”). The Act further provides that the Small Business Advocate is to issue publicly a written statement stating concisely the specific interest of small business consumers to be protected by his initiation of or intervention in any proceeding involving those interests before the Public Utility Commission (“PUC” or the “Commission”) or any other agency or court. This public statement addresses the filing today by the Small Business Advocate of an intervention in the Petition for Approval of Its Act 129 Phase IV Energy Efficiency and Conservation Plan (“Petition”) that was filed with the Pennsylvania Public Utility Commission (“Commission”) on November 30, 2020, by PECO Energy Company (“PECO” or the “Company”).

The Small Business Advocate has intervened in this case to ensure that the interests of small business customers served by PECO are adequately represented. A thorough inquiry by the Commission into all of the elements of the Petition is necessary to ascertain whether PECO’s

proposal for a Phase IV EE&C Plan is in accordance with the Public Utility Code and with the Commission's regulations.

In view of the foregoing, the Small Business Advocate will participate in proceedings before the Commission to investigate whether the Petition is just, reasonable, and non-discriminatory.

Dated: December 21, 2020

**VERIFICATION**

I, John R. Evans, hereby state that the facts set forth herein above are true and correct to the best of my knowledge, information and belief and that I expect to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa. C.S. § 4904 (relating to unsworn falsification to authorities).

Date: 12/21/2020

  
\_\_\_\_\_  
(Signature)

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**Petition of PECO Energy Company for  
Approval of Its Act 129 Phase IV Energy  
Efficiency and Conservation Plan**

:  
: **Docket No. M-2020-3020830**  
:  
:

**CERTIFICATE OF SERVICE**

I hereby certify that true and correct copies of the foregoing have been served via email (*unless otherwise noted below*) upon the following persons, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

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The Honorable Charles E. Rainey Jr.  
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/s/ Steven C. Gray

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Steven C. Gray  
Senior Supervising  
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DATE: December 21, 2020