

COMMONWEALTH OF PENNSYLVANIA




OFFICE OF CONSUMER ADVOCATE

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September 28, 2022

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

Re: Petition of PECO Energy Company to Defer  
Implementation of Customer Assistance  
Program Participant Shopping in Its Service  
Area  
Docket No. P-2022-3035092

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 on the parties as indicated on the enclosed Certificate of Service.

Respectfully submitted,

/s/ Christy M. Appleby  
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Enclosures:

cc: The Honorable Charles E. Rainey, Jr. (**email only:** [crainey@pa.gov](mailto:crainey@pa.gov))  
Bureau of Technical Utility Services (**email only:** [pdiskin@pa.gov](mailto:pdiskin@pa.gov))  
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Certificate of Service

\*335987

## CERTIFICATE OF SERVICE

Petition of PECO Energy Company to Defer :  
Implementation of Customer Assistance : Docket No. P-2022-3035092  
Program Participant Shopping in Its Service :  
Area :

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 28<sup>th</sup> day of September 2022.

### **SERVICE BY E-MAIL ONLY**

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Phone: (717) 783-5048  
Fax: (717) 783-7152  
Dated: September 28, 2022  
\*335989

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Petition of PECO Energy Company :  
To Defer Implementation of Customer : Docket No. P-2022-3035092  
Assistance Program Participant Shopping :  
In its Service Area :

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NOTICE OF INTERVENTION  
OF THE  
OFFICE OF CONSUMER ADVOCATE

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Pursuant to 52 Pa. Code § 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:

Darryl A. Lawrence  
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Christy M. Appleby  
Assistant Consumer Advocate  
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Respectfully submitted,

/s/ Christy M. Appleby  
Christy M. Appleby  
Assistant Consumer Advocate  
PA Attorney I.D. # 85824  
E-Mail: CAppleby@paoca.org

Dated: September 28, 2022

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 to participate in proceedings before the Commission involving the Petition of PECO Energy Company (PECO) to Defer Implementation of Customer Assistance Participant Shopping In Its Service Area.

On September 8, 2022, PECO filed its Petition to Defer Implementation of Customer Assistance Program Participant Shopping in its Service Area (Petition). Through its Petition, PECO is proposing to defer implementation of a CAP shopping Plan and to restrict CAP shopping until the Commission provides further guidance to electric distribution companies about the requirements for CAP Shopping. Petition at ¶ 14. In its Petition, PECO requests to defer implementation of its CAP customer shopping Plan until the Commission provides further guidance to all Pennsylvania EDCs. Petition at ¶ 14.

The objective of the Consumer Advocate in intervening in this case is to protect the interests of consumers in PECO's service territory. The OCA seeks to ensure that the universal service programs are reasonable and appropriately designed. The OCA will also seek to ensure that the costs that are sought to be recovered are consistent with the Commission regulations, statutes and applicable case law and result in rates that are just and reasonable.