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May 7, 2024

VIA ELECTRONIC FILING

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor
Harrisburg, PA 17120

**RE: Pennsylvania Public Utility Commission v. PECO Energy Company – Electric Division;
Docket No. R-2024-3046931**

Dear Secretary Chiavetta:

Attached for filing with the Pennsylvania Public Utility Commission is the Petition to Intervene of the National Railroad Passenger Corporation (“Amtrak”) in the above-referenced proceeding.

As evidenced by the attached Certificate of Service, all parties to this proceeding are being duly served with a copy of this document. Thank you.

Very truly yours,

A handwritten signature in black ink, appearing to read 'Robert A. Weishaar, Jr.', written over a white background.

Robert A. Weishaar, Jr.
MCNEES WALLACE & NURICK LLC

Counsel to the National Railroad Passenger Corporation

c: Marta Guhl, Administrative Law Judge (via e-mail)
Darlene Heep, Administrative Law Judge (via e-mail)
Certificate of Service

CERTIFICATE OF SERVICE

I hereby certify that I am this day serving a true copy of the foregoing document upon the participants listed below in accordance with the requirements of Section 1.54 (relating to service by a participant).

VIA E-MAIL

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Certificate of Service

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Robert A. Weishaar, Jr.

Counsel to the National Railroad Passenger
Corporation

Dated this 7th day of May, 2024, in Harrisburg, Pennsylvania

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission	:	
	:	
v.	:	Docket No. R-2024-3046931
	:	
PECO Energy Company – Electric Division	:	

**PETITION TO INTERVENE OF
THE NATIONAL RAILROAD PASSENGER CORPORATION**

TO THE HONORABLE, THE PENNSYLVANIA PUBLIC UTILITY COMMISSION:

Pursuant to Sections 5.71 through 5.74 of the Pennsylvania Public Utility Commission’s (“PUC” or “Commission”) Regulations, 52 Pa. Code §§ 5.71-5.74, the National Railroad Passenger Corporation (“Amtrak”) hereby files this Petition to Intervene in response to the above-captioned filing of PECO Energy Company (“PECO” or “Company”).

On March 28, 2024, PECO filed with the Pennsylvania Public Utility Commission (“PUC” or “Commission”) proposed Tariff Electric – Pa. P.U.C. No. 8 (“Tariff No. 8”), proposed to become effective on May 27, 2024. Through this filing, PECO requested an increase in its annual distribution revenue of approximately \$464 million and a one-time credit of \$64 million, resulting in a net increase of \$399 million.

In support of its Petition to Intervene, Amtrak asserts the following:

1. Amtrak is a corporation authorized to be created by the Rail Passenger Service Act of 1970, currently set forth at 49 U.S.C. § 24101, *et seq.* Amtrak’s principal place of business is located at 1 Massachusetts Avenue, NW, Washington, DC, 20001. Amtrak provides passenger rail service across the continental United States. Amtrak receives electric service from PECO under Rate EP and other PECO rate schedules. Amtrak consumes substantial amounts of

electricity in its operations. Any modification to PECO's electric rates may impact Amtrak's cost of operations.

2. The names and addresses of Amtrak's attorneys are:

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3. Amtrak's principal interests in this proceeding are with the terms and conditions of its electricity service. The Commission's final disposition of PECO's electric rate case may also directly affect the rates that the Company charges Amtrak for service.

4. Amtrak has an interest in this proceeding that is not represented by any other party of record; consequently, Amtrak satisfies the standards for intervention under Section 5.72 of the Commission's Regulations, 52 Pa. Code § 5.72.

WHEREFORE, the National Railroad Passenger Corporation respectfully requests that the Pennsylvania Public Utility Commission grant this Petition to Intervene, provide Amtrak with full-party status in this proceeding, and allow such other relief as it deems necessary.

Respectfully submitted,

McNEES WALLACE & NURICK LLC

By 

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Counsel to the National Railroad Passenger
Corporation

Dated: May 7, 2024

AFFIDAVIT

DISTRICT OF COLUMBIA

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ss:

ROBERT A. WEISHAAR, JR., being duly sworn according to law, deposes and says that he is Counsel to the National Railroad Passenger Corporation, and that in this capacity he is authorized to and does make this affidavit for it, and that the facts set forth in the foregoing Petition to Intervene are true and correct to the best of his knowledge, information, and belief.


Robert A. Weishaar, Jr.

May 7, 2024