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May 7, 2024

VIA ELECTRONIC FILING

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

RE: Pennsylvania Public Utility Commission v. PECO Energy Company (Electric);
Docket No. R-2024-3046931; Pennsylvania Public Utility Commission v. PECO
Energy Company (Gas); Docket No. R-2024-3046932; **PETITION TO
INTERVENE OF THE SOUTHEASTERN PENNSYLVANIA
TRANSPORTATION AUTHORITY**

Dear Secretary Chiavetta:

Enclosed for filing with the Commission is the Petition to Intervene of the Southeastern Pennsylvania Transportation Authority ("SEPTA") in the above-captioned matter. Copies of the Petition have been served in accordance with the attached Certificate of Service.

Thank you for your attention to this matter. If you have any questions, please do not hesitate to contact me.

Very truly yours,

Todd S. Stewart
*Counsel for the Southeastern Pennsylvania
Transportation Authority*

TSS/jld
Enclosure

cc: Administrative Law Judge Darlene Heep (via electronic mail – dheep@pa.gov)
Administrative Law Judge Marta Guhl (via electronic mail – mguhl@pa.gov)
Per Certificate of Service

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the foregoing document upon the parties, listed below, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a party)

VIA ELECTRONIC MAIL ONLY

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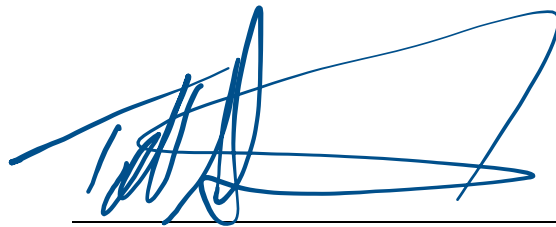
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Todd S. Stewart

DATED: May 7, 2024

**BEFORE
THE PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission	:	
	:	
v.	:	Docket No. R-2024-3046931
	:	
PECO Energy Company (Electric)	:	
	:	
	:	
Pennsylvania Public Utility Commission	:	
	:	
v.	:	Docket No. R-2024-3046932
	:	
PECO Energy Company (Gas)	:	

**PEITION TO INTERVENE
OF THE
SOUTHEASTERN PENNSYLVANIA TRANSPORTATION AUTHORITY**

TO THE HONORABLE ADMINISTRATIVE LAW JUDGES DARLENE HEEP AND MARTA GUHL:

NOW COMES the Southeastern Pennsylvania Transportation Authority¹ (“SEPTA”), pursuant to 52 Pa. Code §§ 5.71-75, and hereby Petitions to Intervene in the above-captioned Base Rate case filed by the PECO Energy Company (“PECO”) seeking to increase base Electricity rates by approximately \$399 million and Natural Gas distribution rates by approximately 22% for SEPTA. SEPTA is a customer under at least three separate electricity rate designations (Rates GS,

¹ SEPTA is a Metropolitan Transportation Authority as that term is defined in 73 P.S. § 1701, et seq., and is authorized, 73 Pa. C.S. § 1741(a) to participate in any matters before any regulatory body affecting the operation of any project of the Authority.

HT and EP) and is a substantial user of electricity supplied by PECO. In support of its Petition, SEPTA states and avers as follows.²

1. On or about March 28, 2024, PECO filed a request to increase its electricity rates by approximately \$399 million, and its natural gas distribution rates by approximately 22%.

2. SEPTA is customer of PECO for electricity and natural gas at multiple locations throughout SEPTA's footprint.

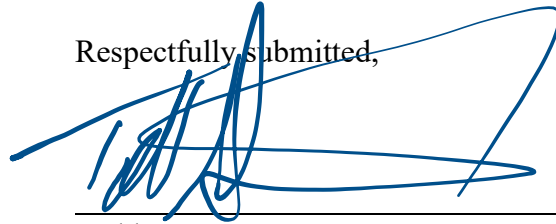
3. Because SEPTA is a creature of state law, and is large customer of PECO, using electricity to operate many of the conveyances it employs to serve its public transportation network, and SEPTA also uses natural gas at a number of its facilities, it has a unique interest in this matter that cannot be adequately represented by any other party to this proceeding. Moreover, because SEPTA is a transportation authority serving the public and the fares it charges to the travelling public are in part a result of the costs of its operation, the public interest will be served by SEPTA's participation in this matter.

4. Because SEPTA has a unique interest in this matter that cannot be represented by any other party and because the public interest will be served by its participation in this proceeding, it has standing to participate in this matter. 52 Pa. Code § 5.72.

² SEPTA understands that neither its intervention, nor its accompanying Prehearing Conference Memorandum, has been filed within the timeframes set out by Your Honors' Prehearing Order. SEPTA was only recently able to retain counsel and apologizes for any inconvenience. Accordingly, to the extent necessary, SEPTA is prepared to take the case as it finds it.

WHEREFORE, the Southeastern Pennsylvania Transportation Authority hereby requests that its Petition to Intervene be granted and that it be afforded full party status in this proceeding.

Respectfully submitted,



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*Counsel for the Southeastern Pennsylvania
Transportation Authority*

DATED: May 7, 2024

VERIFICATION

I, Nikolaus H. Grieshaber, Chief Financial Officer, SEPTA hereby state that the facts set forth in the foregoing documents 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: May 7, 2024

Signature: _____

