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December 18, 2025

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

VIA ELECTRONIC FILING

RE: Petition of PECO Energy Company for Approval of its Act 129 Phase V Energy Efficiency and Conservation Plan; Docket No. M-2025-3057328

Dear Secretary Homsher:

Attached for filing with the Pennsylvania Public Utility Commission is the Petition to Intervene of the Philadelphia Area Industrial Energy Users Group ("PAIEUG"), in the above-referenced proceeding.

As shown by the attached Certificate of Service, all parties to this proceeding are being duly served with a copy of this filing. If you have any questions regarding the document, please contact the undersigned. Thank you.

Sincerely,

A handwritten signature in black ink that reads 'Victoria A. Geddis'.

Victoria Geddis
MCNEES WALLACE & NURICK LLC

Counsel to the Philadelphia Area Industrial Energy Users Group

c: Charles E. Rainey Jr., Chief Administrative Law Judge (via e-mail)
Certificate of Service

CERTIFICATE OF SERVICE

I hereby certify that I have this day served 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).

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Victoria A. Geddis

Counsel to Philadelphia Area Industrial
Energy Users Group

Dated this 18th day of December, 2025, in Harrisburg, Pennsylvania.

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of PECO Energy Company :
For Approval of its Act 129 Phase V : Docket No. M-2025-3057328
Energy Efficiency and Conservation Plan :

**PETITION TO INTERVENE
OF THE PHILADELPHIA AREA INDUSTRIAL
ENERGY USERS GROUP**

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 Philadelphia Area Industrial Energy Users Group ("PAIEUG") hereby files this Petition to Intervene in response to the above-captioned filing of PECO Energy Company ("PECO" or "Company").

On December 1, 2025, PECO petitioned the Commission for approval of the Company's Phase V Energy Efficiency & Conservation ("EE&C") Plan ("Phase V Plan"). PECO's Petition for Approval of its Phase V Plan ("Petition") outlines PECO's proposal to address the requirements of Act 129 and the PUC's Phase V Implementation Order entered on June 18, 2025, at Docket No. M-2025-3052826 ("Implementation Order"). *See* Petition, p. 1.

According to PECO, the Company employed a market-based approach in order to design Phase V programs that will satisfy PECO's Phase V energy savings and peak demand reduction targets. *See id.* at 1-2, 7-8. PECO proposes to recover the accompanying costs through the Phase V Energy & Conservation Program Charge ("Phase V EEPC"), which will be fully reconcilable and non-bypassable. *See id.* at 11-12. As a result, PECO's Phase V Plan costs and program measures may impact the rates and services of PECO's largest customers. It is therefore

imperative that PECO implement its Phase V EE&C Plan in a just and reasonable manner, consistent with Act 129, the Implementation Order, and all applicable statutes and regulations.

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

1. PAIEUG is an *ad hoc* group of energy-intensive customers receiving electric service from PECO under Rate HT. PAIEUG members consume substantial amounts of electricity in their manufacturing and operational processes, and these electric costs are a significant element of their respective costs of operation. Any modification to PECO's electric rates may impact PAIEUG members' cost of operations.

2. The names and address of PAIEUG's attorneys are:

Charis Mincavage (I.D. No. 82039)
Adeolu A. Bakare (I.D. 208541)
Victoria A. Geddis (I.D. No. 335500)
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3. For purposes of this proceeding, PAIEUG includes the members listed in Appendix A hereto. PAIEUG reserves the right to update Appendix A, as needed, during the course of this proceeding to reflect any changes in its membership.

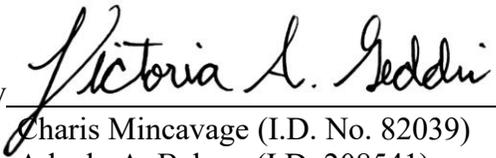
4. PAIEUG members are concerned with issues regarding the terms and conditions of their electricity service, and, as a result, have been actively involved in numerous PECO proceedings, including participating in the adjudication of the Company's Phase I through Phase IV EE&C proceedings, as well as regularly attending PECO's EE&C Plan stakeholder meetings. The Commission's final disposition of PECO's Phase V Plan may also directly affect the rates that the Company imposes on PAIEUG members for service.

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

WHEREFORE, the Philadelphia Area Industrial Energy Users Group respectfully requests that the Pennsylvania Public Utility Commission grant this Petition to Intervene, provide PAIEUG 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 Philadelphia Area Industrial
Energy Users Group

Dated: December 18, 2025

APPENDIX A

PHILADELPHIA AREA INDUSTRIAL ENERGY USERS GROUP

Airgas USA, LLC, an Air Liquide Company
Boeing Company, The
Cleveland-Cliffs
Drexel University
GlaxoSmithKline
Kimberly-Clark Corporation
Main Line Health
Merck & Co., Inc.
Philadelphia College of Osteopathic Medicine
Saint Joseph's University
Swarthmore College
Temple University
Jefferson
Villanova University

