



CITY OF PHILADELPHIA

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April 23, 2015

Via E-Filing
Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Post Office Box 3265
Harrisburg, PA 17105

Re: City of Philadelphia's Petition to Intervene, Pennsylvania Public Utility
Commission v. PECO Energy Company – Electric Division
Docket No. R-2015-2468981

Dear Secretary Chiavetta:

I have enclosed an original of the City of Philadelphia's Petition to Intervene in regard to the above noted subject which I filed electronically today.

Sincerely,


Jocelyn G. Hill
Assistant City Solicitor

JGH/mh

cc: Attached Service List (w/enclosure)

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission :
 :
v. : Docket No. R-2015-2468981
 :
PECO Energy Company – Electric Division :

PETITION TO INTERVENE OF THE CITY OF PHILADELPHIA

Pursuant to 52 Pa. Code §§ 5.71-5.74, The City of Philadelphia (“City”) hereby files this Petition to Intervene in the above-captioned proceeding. In support thereof, the City states as follows:

1. Petitioner is The City of Philadelphia, City Hall, Philadelphia, Pennsylvania 19107.

2. The names and address of Petitioner’s attorneys are:

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Scott J. Schwarz, Esquire
Jocelyn G. Hill, Esquire
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3. On or about March 27, 2015, PECO Electric Company (PECO) filed a request for a base rate increase of \$190 million for electric distribution rates, effective May 26, 2015, as stated in PECO’s Statement in Volume I of its filing.

4. Petitioner is a corporation and body politic, organized and existing as a city of the first class under the Commonwealth of Pennsylvania and the Philadelphia Home Rule Charter, and is engaged in the government and administration of the City of Philadelphia.

5. The City has interests that may be directly affected and that are not adequately represented by other participants, and as to which the Petitioner may be bound by the action of the Commission in this proceeding.

6. The City is among the largest of PECO's electricity distribution customers. The City, both as a customer and as a political jurisdiction, relies on PECO's infrastructure in Center City and throughout Philadelphia, including the City Hall and other municipal buildings, the Philadelphia Water Department facilities, Philadelphia Airport System, the Philadelphia prison facilities, street and traffic lighting, among others.

7. The City currently has over 1,000 metered accounts with PECO and spends about \$15 million dollars per year on electricity distribution under various rates and riders, including Rates GS, HT, PD, SL-E, TLCL and AL. Any decision on these rates or riders would directly affect the City and its operations.

8. The City, as one of the largest electricity distribution customers of PECO, has an interest in whether PECO's requested rates are appropriate.

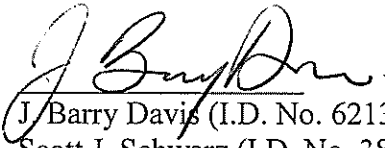
9. The City has standing to intervene in matters involving PECO's requested rates as they directly affect it and its citizens.

10. The City's interest in PECO's requested electric rates is of such nature that the City's participation in this proceeding is in the public interest. Accordingly, the Commission should grant the City party status in this proceeding.

WHEREFORE, the City of Philadelphia respectfully request that the Commission grant this Petition to Intervene and provide the City with full party status.

Respectfully submitted,

The City of Philadelphia

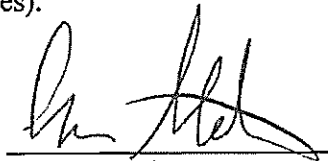


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VERIFICATION

I, Andrew Stober, hereby declare that I am the Chief of Staff for the Mayor's Office of Transportation and Utilities for the City of Philadelphia, which supervises the City's Energy Office; that I am authorized to make this verification on the City of Philadelphia's behalf; that the facts set forth 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: April 21, 2015



Andrew Stober
Chief of Staff
Mayor Office, Transportation and Utilities
City of Philadelphia

CERTIFICATE OF SERVICE

I hereby certify that I am serving a true and correct copy of the foregoing document this day by first-class mail, postage-prepaid, and/or by electronic mail, on the parties listed below, addressed as follows:

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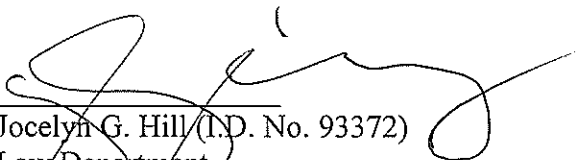
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Dated: April 23, 2015