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June 1, 2015

Via Electronic Filing


Rosemary Chiavetta, Secretary
PA Public Utility Commission
PO Box 3265
Harrisburg, PA 17105-3265

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

Dear Secretary Chiavetta:

Enclosed please find the KEEA Energy Education Fund's Petition to Intervene. All parties have been served in accordance with the attached Certificate of Service.

Sincerely,



Sarah C. Stoner

SCS/dsc

Enclosure

cc: The Honorable Angela T. Jones (w/encl.)
Cert. of Service w/enc.

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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

KEEA ENERGY EDUCATION FUND’S PETITION TO INTERVENE

Pursuant to 52 Pa. Code §§ 5.72-5.75, KEEA Energy Education Fund, the public education and charitable arm of the Keystone Energy Efficiency Alliance, (“KEEA”) submits this Petition to Intervene in the above captioned proceeding.¹ KEEA has roughly 50 members that implement energy efficiency improvements in buildings across the Commonwealth, including in the service territory of PECO Energy Company (“PECO”).² The ability of KEEA members to continue to offer energy efficiency improvements will be directly impacted by the outcome of this proceeding particularly if the result is to increase costs (or implement other measures) that negatively impact the ability of customers to avail themselves of the energy efficiency improvements that can be offered by KEEA members.

¹ KEEA recognizes that the prehearing conference has already been conducted and that the procedural schedule has been established. KEEA was only recently able to acquire counsel for this proceeding and accepts the schedule as adopted. As such, KEEA submits there is no prejudice to any party by granting this petition to intervene at this time.

² KEEA’s members include: AFC First Financial Corporation, AM Conservation Group, Calliope Communications, LLC, Clean Markets, CLEAResult, Conservation Consultants, Inc., Conservation Services Group, Delaware Valley Green Building Council, DNV-GL, EMC2 Development Corporation, EnergySavvy, EnerNOC, Ecentiv Energy, Energy Coordination Agency, Franklin Energy Services, Honeywell Utility Solutions, ICF International, Lockheed Martin, MaGrann Associates, Nest, OPower, Pure Energy Coach, LLC, SmartWatt Energy, Inc., Strategic Energy Group, Sustainable Futures Communications, Warren Engineering, Willdan Energy Solutions.

In further support of this intervention, KEEA states as follows:

1. KEEA's attorneys in this matter are:

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Deanne M. O'Dell, Esq.
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2. On March 27, 2015, PECO Energy Company ("PECO") submitted a rate filing, Tariff-Electric PA P.U.C. No. 5 ("Tariff 5"), in which PECO proposes to increase its retail distribution rates by approximately \$190.1 million. If granted, this increase would raise PECO's distribution rates by an average of approximately 15.6%. For residential customers, PECO proposes to increase the customer charges for both Rate R and RH by 68.3%.

3. The Commission's regulations allow intervention where a person has an interest in the proceeding which may be directly affected and which is not adequately represented by existing parties, and, as to which the person may be bound by the action of the Commission in the proceeding. 52 Pa. Code § 5.72(a)(2). Intervention is also permitted where participation of the person may be in the public interest. 52 Pa. Code § 5.72(a)(3). A "person" includes a corporation and an association. 52 Pa. Code § 1.8. KEEA meets the standards for intervention set forth in 52 Pa. Code § 5.72(a).

4. First, KEEA will be directly affected and bound by the outcome of this proceeding. KEEA is committed to improving the efficiency of Pennsylvania's buildings. As such, KEEA's members implement energy efficiency improvements in buildings across the Commonwealth, including in the service territory of PECO. There are several ways in which the outcome of this

proceeding could detrimentally impact KEEA's members. One is PECO's proposal to increase the fixed charge. Requiring customers to pay more could reduce the financial incentive for building owners to save energy, generating a longer payback period for efficiency improvements to the building envelop, building automation systems, heating, cooling, lighting, ventilation and other end uses. Reducing the incentives of PECO's customers to implement energy efficiency measures offered by KEEA will have a direct impact on KEEA's members. Therefore, any charges proposed by PECO which may increase costs for customers must be reviewed to assess their cost justification, their impact on the cost effectiveness to the customer of implementing efficiency improvements and whether such increases are consistent with the policy of the Commonwealth to encourage energy efficiency.

5. Another way in which KEEA's members could be impacted by this proceeding is through the Commission's implementation of the state's energy efficiency and conservation programs (i.e. Act 129). Some of KEEA's members directly participate in the Act 129 plans of PECO and could be detrimentally impacted if the outcome of this case is to negate the ability of KEEA members to continue to participate in these programs or the outcome otherwise impairs the functioning of PECO's Act 129 plan.

6. These are the preliminary issues identified by KEEA at this early stage in the proceeding which have the potential to directly impact KEEA. KEEA reserves the right to raise and address issues identified through its continued review and analysis of PECO's rate increase proposal or other issues raised by other parties which might result in decreasing the ability of KEEA's to offer building energy efficiency in Pennsylvania.

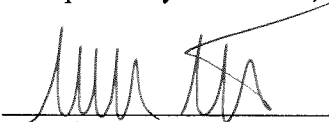
7. For all these reasons, KEEA is directly impacted and will be bound by the outcome of this proceeding and, therefore, intervention should be granted.

8. Regarding the second requirement for intervention, KEEA's interests in this proceeding are unique from, and not adequately represented by, other parties that may seek to intervene. KEEA is a well-established local organization which has extensive experience in energy efficiency in Pennsylvania. KEEA is an active participant in the Commission's Act 129 proceedings and can offer the unique perspectives and insights of a trade association representing a diverse mix of members that implement energy efficiency improvements in buildings across the Commonwealth. Moreover, some of KEEA's members are actively participating in the Act 129 programs of PECO and, therefore, KEEA can assess and offer its perspectives about how PECO's proposals will affect the success of PECO's Act 129 initiatives. As such, KEEA's interests in this proceeding are unique from other parties that may seek to intervene and its intervention should be granted.

9. Regarding the final requirement for intervention, KEEA's intervention is in the public interest. As a party in this proceeding, KEEA will be able to offer its unique perspective and experience with energy efficiency programs for PECO's customers which will assist the Commission as it considers PECO's proposals. Thus, granting KEEA's intervention is in the public interest.

WHEREFORE, for all the reasons set forth above, KEEA respectfully requests that the Commission grant this Petition to Intervene.

Respectfully submitted,



Sarah Stoner, Esquire

Date: June 1, 2015

Attorney for KEEA Energy Education Fund

VERIFICATION

I hereby verify that the facts contained in the foregoing pleading are true and accurate to the best of my knowledge and that I am duly authorized to make this verification, and that I expect to be able to prove the same at any hearing held in this matter. I understand that the statements herein are made subject to penalties of 10 Pa.C.S. § 4904 (relating to unsworn falsification to authorities).



Brian Kauffman, Executive Director
Keystone Energy Efficiency Alliance
KEEA Energy Education Fund

CERTIFICATE OF SERVICE

I hereby certify that this day I served a copy of KEEA Energy Education Fund's Petition to Intervene upon the persons listed below in the manner indicated in accordance with the requirements of 52 Pa. Code § 1.54.

Via Email and/or First Class Mail

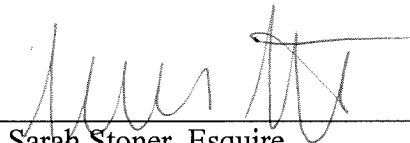
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Date: June 1, 2015



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