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June 22, 2015

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JUN 20 2015

Rosemary Chiavetta, Secretary
Pennsylvania Public Utilities Commission
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17120

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

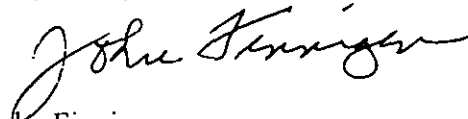
**RE: Pennsylvania Public Utility Commission v. PECO Energy Company – Electric Division
Docket R-2015-24698981**

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Dear Ms. Chiavetti,

Please find enclosed for filing the Motion for Admission Pro Hac Vice, Notice of Appearance, Petition to Intervene of Environmental Defense Fund and the Prehearing Memorandum on Behalf of Environmental Defense Fund. Please contact me if you have any questions regarding this filing. Thank you for your consideration.

Very truly yours,



John Finnigan

cc: All parties of record (with enclosure)

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**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION** PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

Pennsylvania Public Utility Commission :
 :
v. : R-2015-2468981
 :
PECO Energy Company – Electric Division :

PETITION TO INTERVENE

Now comes Environmental Defense Fund (EDF), by counsel, John Finnigan, Michael Panfil, and Heather Langeland, and hereby Petitions to Intervene in the above captioned matter. Petitioner requests that the Pennsylvania Public Utility Commission (Commission) grant Petitioner status as Intervenor in these proceedings concerning the PECO Energy Company – Electric Division (PECO).

PETITION TO INTERVENE

Petitioner provides the following in support of its Petition to Intervene:

1. Petitioner is EDF, an international nonprofit corporation headquartered in New York, New York (www.edf.org). EDF has 16,089 members living in Pennsylvania, and 361,703 members nationwide. EDF has several members who are PECO customers, including the following: Gretchen Dahlkemper, 1637 South 15th St., Philadelphia, PA 19145; Lise Lubursky, 241 S. 6th St., Apt. 911, Philadelphia, PA 19106-3731; Frances Robb, 966 N. Lawrence St., Philadelphia, PA 19123-1438; Thelma Vanderslice, 2037 Lansing St., Philadelphia, PA 19152-3609; and Karen Bond, 523 E. Mt. Airy Ave., Philadelphia, PA 19119-1145.

2. EDF engages in policy development, public education, litigation and other actions to achieve its goals, including the promotion of clean energy resources and technologies.
3. The name and address of counsel for Petitioner is:

Michael Panfil
EDF
1875 Connecticut Ave., N.W.
Washington, DC 20009
Phone: (202) 572-3280
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(motion for pro hac vice admission pending)

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Heather M. Langeland
Pa. Bar Id. No. 207387
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4. On or about March 27, 2015, PECO, pursuant to Section 1308 of the Pennsylvania Public Utility Code, 66 Pa.C.S. 1308, petitioned the Commission for approval of a rate increase.
5. The rate increase proposed by PECO would increase rates across its service territory. The Petitioner, on behalf of its members and the public interest, has an interest in ensuring that the PECO maximizes the use of cost-effective, clean energy.

6. *Petitioner has a right and interest in assuring that safe, reliable, clean and affordable public utility service, and participation in these Proceedings is an appropriate way to protect these rights and interest. The Commission recently granted Petitioner the right to intervene in general rate cases filed by the four electric distribution utility operating companies of FirstEnergy: West Penn Power Company (Docket No. R-2014-2428742), Pennsylvania Electric Company (Docket No. R-2014-2428743), Pennsylvania Power Company (Docket No. R-2014-2428744) and Metropolitan Electric Company (Docket No. R-2014-2428745). Petitioner may intervene in this proceeding pursuant to 52 Pa. Code 5.71-74.*
7. *Petitioner has interests in and perspectives on issues in this proceeding that are not adequately represented by other parties of record, including: rate design, distribution grid planning and modernization, distributed generation policy, smart grid planning and functionality, time-of-use rate design, PECO's proposed increase in fixed charges, net metering, customer utilization of advanced grid functionality, utility performance incentives, energy efficiency and demand response, LED lighting, cost-benefit analysis policy, third-party access to energy usage data, and other issues.*
8. *Petitioner intends to review and analyze PECO's Petition as it pertains to rates within its utility service territory. The variety and type of tariffs and riders proposed will directly impact Petitioner's members' interests in ensuring cost effective clean energy development.*
9. *Petitioner reserves the right to raise other issues as necessary and appropriate during the course of the proceeding and to respond to issues raised by other parties.*


10. All documents and correspondence in this proceeding should be addressed to the three attorneys who have entered a notice of appearance for EDF in this proceeding: Michael Panfil, John Finnigan and Heather Langeland.

For the foregoing reasons, Petitioner requests that the Commission grant this Petition and confer status as Intervenor in this Proceeding.

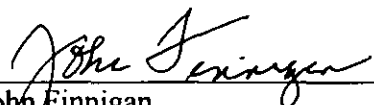
CONCLUSION

Wherefore, EDF respectfully requests that the Commission grant this Petition to Intervene, provide EDF with full-party status in this proceeding, and allow such other relief as it deems necessary.

Respectfully submitted,



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Date: June 22, 2015

Counsel for Environmental Defense Fund