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March 19, 2020

**VIA ELECTRONIC FILING**

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

Re: Pennsylvania Public Utility Commission, et al. v. Philadelphia Gas Works  
Docket No. R-2020-3017206; **PETITION TO INTERVENE**

Dear Secretary Chiavetta:

Enclosed please find the Petition to Intervene of Direct Energy Services in the above-captioned docket. Copies of the Petition have been served in accordance with the attached Certificate of Service.

If you have any questions, please do not hesitate to contact me.

Very truly yours,

Todd S. Stewart  
*Counsel for Direct Energy Services*

TSS/jld  
Enclosure  
cc: Per Certificate of Service

**CERTIFICATE OF SERVICE**

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

**VIA ELECTRONIC AND FIRST-CLASS MAIL**

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**VIA ELECTRONIC MAIL ONLY**

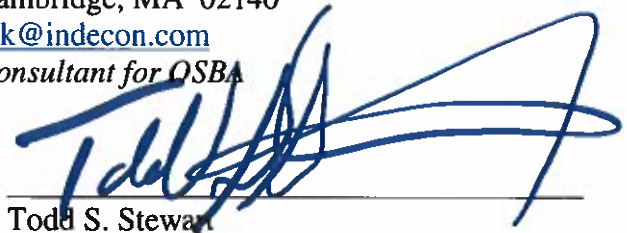
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Todd S. Stewart

DATED: March 19, 2020



other proceedings that concern that terms and conditions of service of the natural gas and electric distribution utilities in whose service territories it is active.

2. Direct Energy is represented in this matter by the following counsel:

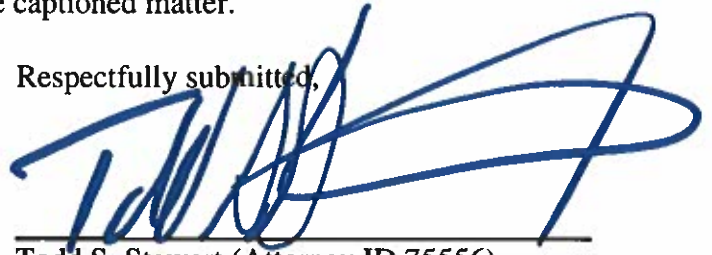
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3. PGW has proposed in this proceeding to substantially modify the following tariff provisions: (1) Technology and Economic Development (TED) Rider to extend it beyond the initial three-year pilot period; (2) the Company's Micro-Combined Heat and Power (CHP) Incentive Program which PGW alleges will incentivize customers to install micro-CHP equipment up to 50 kW; and (3) the Company's Back-Up Service - Rate BUS. In addition, in the latter part of 2019, pursuant to a settlement with the Commission's Bureau of Investigation and Enforcement at Docket No. 2019-3009266, PGW substantially increased the capacity charges for releases of TETCO capacity, which has had a substantial negative impact on Direct Energy's ability to serve in the PGW service territory. Direct Energy expects to address these issues, while it continues to review the filing, and therefore reserves the right to address additional issues in testimony or as otherwise appropriate.

4. Direct Energy serves customers on the PGW system; therefore, its interests will be directly affected by any decision or determination in this proceeding, and it will be bound by any such decision. Direct Energy's interests in this proceeding are unique and cannot be represented by any other party. Accordingly, Direct Energy meets the standards of 52 Pa. Code § 5.72(a)(2), and its intervention in this proceeding should be granted and it should be accorded full party status.

WHEREFORE, Direct Energy respectfully requests that its Petition to Intervene be granted and that it be accorded full party status in the above captioned matter.

Respectfully submitted,



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*Counsel for Direct Energy Services, Inc.*

DATED: March 19, 2020