

 **H**awke
  **M**cKeon &
   **S**niscak LLP
ATTORNEYS AT LAW

Todd S. Stewart
Office: 717 236-1300 x242
Direct: 717 703-0806
tsstewart@hmslegal.com

100 North Tenth Street, Harrisburg, PA 17101 Phone: 717.236.1300 Fax: 717.236.4841 www.hmslegal.com

May 1, 2020

VIA ELECTRONIC FILING

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

RE: Petition of PPL Electric Utilities Corporation for Approval of Its Default Service Plan for the Period From June 1, 2021 through May 31, 2025, Docket No. P-2020-3019356; **PETITION TO INTERVENE OF INTERSTATE GAS SUPPLY, INC., SHIPLEY CHOICE LLC, NRG ENERGY, INC, VISTRA ENERGY CORP., ENGIE RESOURCES LLC., WGL ENERGY, AND DIRECT ENERGY SERVICES, LLC**

Dear Secretary Chiavetta:

Enclosed for filing with the Commission is the Petition to Intervene of Interstate Gas Supply, Inc., Shipley Choice LLC, NRG Energy, Inc, Vistra Energy Corp., ENGIE Resources LLC., and Direct Energy Services, LLC ("EGS Parties") in the above-captioned proceedings. Copies of this Petition have been served in accordance with the attached Certificate of Service.

Thank you for your attention to this matter. If you have any questions related to this filing, please do not hesitate to contact my office.

Very truly yours,


Todd S. Stewart
Counsel for
EGS Parties

TSS/jld
Enclosure

cc: Administrative Law Judge Elizabeth Barnes
Per Certificate of Service

CERTIFICATE OF SERVICE

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

VIA ELECTRONIC MAIL

Honorable Elizabeth Barnes
Administrative Law Judge
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor
Harrisburg, PA 17120
ebarnes@pa.gov

Michael W. Hassell
Lindsay A. Berkstresser
Post & Schell, P.C.
17 North Second Street, 12th Floor
Harrisburg, PA 17101-1601
mhassell@postschell.com
lberkstresser@postschell.com
Counsel for PPL Electric Utilities Corporation

Kimberly A. Klock
Michael J. Shafer
PPL Services Corporation
Two North Ninth Street
Allentown, PA 18101
kklock@pplweb.com
mjshafer@pplweb.com
Counsel for PPL Electric Utilities Corporation

Elizabeth R. Marx, Esquire
John Sweet, Esquire
Ria Pereira, Esquire
Pennsylvania Utility Law Project6
118 Locust Street
Harrisburg, PA 17101
pulp@palegalaid.net
Counsel for CAUSE-PA

DATED: May 1, 2020

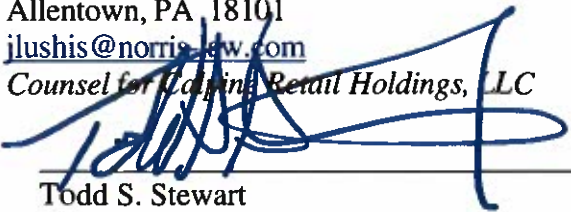
Gina L. Miller
Commonwealth of Pennsylvania
Pennsylvania Public Utility Commission
Bureau of Investigation and Enforcement
PO Box 3265
Harrisburg, PA 17105-3265
ginmiller@pa.gov

Christy M. Appleby
David T. Evrard
Office of Consumer Advocate
555 Walnut Street, 5th Floor
Harrisburg, PA 17101-1923
cappleby@paoca.org
devrard@paoca.org

Steven C. Gray
Office of Small Business Advocate
555 Walnut Street, 1st Floor
Harrisburg, PA 17101
sgray@pa.gov

Kenneth L. Mickens, Esquire
316 Yorkshire Drive
Harrisburg, PA 17111
Kmickens11@verizon.net
Counsel for The Sustainable Energy Fund

John F. Lushis, Jr., Esquire
Norris McLaughlin, P.A.
515 W. Hamilton Street, Suite 502
Allentown, PA 18101
jlushis@norris-mc.com
Counsel for Caplink Retail Holdings, LLC



Todd S. Stewart

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of PPL Electric Utilities Corporation :
for Approval of Its Default Service Plan : Docket No. P-2020-3019356
for the Period From June 1, 2021 through :
May 31, 2025

**PETITION TO INTERVENE
OF INTERSTATE GAS SUPPLY, INC., SHIPLEY CHOICE LLC,
NRG ENERGY, INC, VISTRA ENERGY CORP., ENGIE RESOURCES LLC.,
WGL ENERGY, AND DIRECT ENERGY SERVICES, LLC**

NOW COMES, Interstate Gas Supply, Inc., Shipley Choice LLC, NRG Energy, Inc, Vistra Energy Corp., ENGIE Resources LLC., WGL Energy, and Direct Energy Services, LLC (“EGS Parties”) by and through their counsel, Hawke McKeon & Sniscak LLP, and respectfully petition to intervene in the above-captioned proceeding. In support thereof, the EGS Parties state and avers as follows:

1. The EGS Parties are: Interstate Gas Supply, Inc., Shipley Choice LLC, NRG Energy, Inc¹, Vistra Energy Corp., ENGIE Resources LLC., and Direct Energy Services, LLC. All are either electric generation suppliers (“EGS”), or are the parent of wholly owned EGS subsidiaries, that are licensed by the Commission to provide electric generation supply services in the PPL service territory.

¹ NRG’s wholly owned subsidiaries include: Energy Plus Holdings LLC (A-2009-2139745), Independence Energy Group LLC d/b/a Cirro Energy (A-2011-226337), Reliant Energy Northeast LLC d/b/a NRG Home & NRG Business (A-2010-2192350), Green Mountain Energy Company (A-2011-2229060), XOOM Energy Pennsylvania, LLC (A-2012-2283821), Stream Energy Pennsylvania, LLC (A-2010-2181867)

2. The EGS Parties are concerned about PPL's proposed modifications to its heretofore successful Standard Offer Program ("SOP"), its proposal to eliminate shopping by customers on Customer Assistance ("CAP"), and PPL's proposal to provide a 100% renewable product as a default service "option." All these proposals appear to be detrimental to the continued development of a competitive market in the PPL service territory. In addition, the EGS Parties will propose changes to responsibility for Network Integration Transmission Service ("NITS"). The EGS Parties continue to review the PPL filing and may raise additional issues as appropriate.

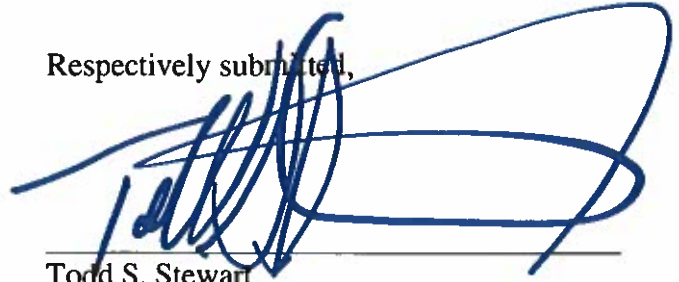
3. As active retail suppliers of electricity, the EGS Parties have a substantial and unique interest in this proceeding that cannot adequately be represented by any other party, and EGS Parties will be bound by any decision rendered by the Pennsylvania Public Utility Commission in this matter. Accordingly, EGS Parties' participation in this proceeding meets the standard for intervention set forth in the Commission's Regulations at 52 Pa. Code §§ 5.71, et seq.

4. Representing the EGS Parties in this proceeding is the following counsel:

Todd S. Stewart (Attorney ID # 75556)
Hawke McKeon & Sniscak LLP
100 North Tenth Street
Harrisburg, PA 17101
tsstewart@hmslegal.com
717.236.1300 (voice)
717.236.4841 (fax)

WHEREFORE, the EGS Parties respectfully request that their Petition to Intervene be granted and that they collectively be afforded full party status in this matter.

Respectively submitted,



Todd S. Stewart
PA Attorney I.D. # 75556
Hawke McKeon & Sniscak, LLP
100 North Tenth Street
Harrisburg, PA 17101
tsstewart@hmslegal.com
717.236.1300 (voice)
717.236.4841 (fax)

Counsel for EGS Parties

DATED: May 1, 2020