



**Phillips Lytle** LLP

**VIA ELECTRONIC FILING**

May 6, 2020

Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street, 2nd Floor North  
Harrisburg, PA 17120

**Re: Docket P-2020-3019356, PPL Electric Utilities Corporation Petition for Default Service Plan for the Period June 1, 2021 through May 31, 2025**

Dear Secretary Chiavetta,

Enclosed please find the Petition to Intervene on behalf of StateWise Energy Pennsylvania LLC and SFE Energy Pennsylvania, Inc. (collectively, "StateWise") in the above-referenced proceeding. Copies have been provided to Administrative Law Judge Elizabeth H. Barnes and those indicated on the Certificate of Service.

Respectfully submitted,

Phillips Lytle LLP

By *Gregory L. Peterson*

Gregory L. Peterson

Enclosure

cc: Certificate of Service  
Administrative Law Judge Elizabeth H. Barnes

ATTORNEYS AT LAW

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**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**PPL Electric Utilities Corporation Petition for  
Default Service Plan for the Period June 1, 2021  
through May 31, 2025**

**Docket P-2020-3019356**

**PETITION TO INTERVENE  
OF STATEWISE ENERGY PENNSYLVANIA LLC  
AND SFE ENERGY PENNSYLVANIA, INC.**

Pursuant to Section 5.71 to 5.74 of the Pennsylvania Public Utility Commission's ("Commission") regulations, 52 Pa. Code §§ 5.71 to 5.74, StateWise Energy Pennsylvania LLC and SFE Energy Pennsylvania, Inc. (collectively, "StateWise") respectfully submits this petition to intervene in the above referenced-proceeding ("Petition to Intervene").

On March 25, 2020, PPL Electric Utilities Corporation ("PPL") filed a Petition for Approval of its Default Service Plan for the Period June 1, 2021 through May 31, 2025 ("DSP V Petition"). The DSP V Petition outlines PPL's proposal to acquire and supply default service to PPL customers who do not take service from an alternative electric generation supplier ("EGS"). In support of its Petition to Intervene, StateWise asserts the following:

1. StateWise is a licensed EGS serving residential and commercial customers in Pennsylvania. StateWise offers a range of energy-related value-added products and services, including renewable energy and environmental attributes to support its customers' decarbonization objectives.

2. The DSP V Petition includes proposed products, services, and rates which would apply to all retail customers in PPL's service territory, including current and potential future customers of StateWise.

3. The name and address of StateWise's attorney is

Gregory L. Peterson  
PA I.D. No. 23976  
201 West Third Street, Suite 205  
Jamestown, NY 14701-4907  
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4. StateWise's interest in DSP V Petition relates to the integrity of competitive markets in Pennsylvania, including the development, expansion, and maintenance of competitive markets and programs that encourage the provision of innovative value-added retail products and services to Pennsylvania energy customers. In particular, StateWise has concerns about the prudence, appropriateness,

and structure of PPL's Electric Renewable Rate Program and the Customer Assistance Program as proposed in the DSP V Petition.

5. StateWise also has concerns regarding PPL's proposed rate design around default generation service and whether it includes all cost components incurred to provide default service as required by applicable law and policies.

6. StateWise intends to participate in the above-referenced proceeding to the extent necessary to protect and advocate for its interests and those of its customers, which cannot be adequately represented by any other party. Without having an opportunity to intervene, StateWise would be bound by the actions taken by the Commission with respect to the DSP V Petition which may have a material impact on StateWise's operations as an EGS serving customers in PPL's service territory.

7. StateWise's participation also serves the public interest as StateWise has extensive experience and industry knowledge that may assist in the development of a complete record on the reasonableness and prudence of programs proposed in the DSP V Petition.

8. As set forth above, StateWise has a substantial and direct interest in this proceeding and satisfies the standards for intervention. 52 Pa. Code § 5.72 (permitting intervention by a party that demonstrates an "interest which may be directly affected

and which is not adequately represented by existing participants, and as to which the petitioner may be bound by the action of the Commission in the proceeding”).

**WHEREFORE**, StateWise respectfully requests that the Pennsylvania Public Utility Commission grant this Petition to Intervene, providing StateWise with full party status in this proceeding.

May 6, 2020

Respectfully submitted,

Phillips Lytle LLP

By *Gregory L. Peterson*

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## VERIFICATION

I, Jeff Donnelly, Director of Regulatory Affairs and Compliance for StateWise Energy Pennsylvania LLC and SFE Energy Pennsylvania, Inc. ("StateWise"), hereby state that the facts set forth in the above-referenced Petition to Intervene in Docket P-2020-3019356 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 false statements made herein are made subject to the penalties of 18 Pa. C.S. Section 4904, relating to unsworn falsifications to authorities.

Dated: May 6, 2020

*Jeff Donnelly*

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Jeff Donnelly  
StateWise Energy Pennsylvania LLC  
SFE Energy Pennsylvania, Inc.

## CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been served upon the following persons, in the manner indicated, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

### VIA E-MAIL

The Honorable Elizabeth H. Barnes  
Administrative Law Judge  
Pennsylvania Public Utility Commission  
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May 6, 2020

Respectfully submitted,

Phillips Lytle LLP

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**NOTICE TO PLEAD**

You are hereby notified that a responsive pleading to the enclosed Petition to Intervene must be filed within twenty (20) days of the date of service. All responsive pleadings must be filed with the Secretary of the Pennsylvania Public Utility Commission with a copy served to counsel for StateWise Energy Pennsylvania LLC and SFE Energy Pennsylvania, Inc. and the Administrative Law Judge assigned to this matter.

**File with:**

Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street, 2nd Floor North  
Harrisburg, PA 17120

**With a copy to:**

Gregory L. Peterson  
PA I.D. No. 23976  
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Due to the COVID-19 pandemic, the Pennsylvania Public Utility Commission is encouraging individuals to eFile documents. Information regarding eFiling with the Commission is available at <https://www.puc.pa.gov/efiling/default.aspx>.

Date: May 6, 2020

*Gregory L. Peterson*

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Gregory L. Peterson  
Attorney for *StateWise Energy  
Pennsylvania LLC and SFE Energy  
Pennsylvania, Inc.*