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May 6, 2020

Via Electronic Filing

Rosemary Chiavetta, Esq.
PA Public Utility Commission
P.O. Box 3265
Harrisburg, PA 17105-3265

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

Dear Secretary Chiavetta:

Enclosed for electronic filing please find the Retail Energy Supply Association's ("RESA") Petition to Intervene with regard to the above-referenced matter. The undersigned certifies that this filing contains no averments or denials of fact subject to verification and penalties under 52 Pa. Code Section 1.36. Copies to be served in accordance with the attached Certificate of Service.

Sincerely,

Kristine E. Marsilio

Kristine E. Marsilio, Esq.

KEM/lww

Enclosure

cc: Hon. Elizabeth Barnes w/enc.
Cert. of Service w/enc.

CERTIFICATE OF SERVICE

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

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Date: May 6, 2019

Kristine E. Marsilio

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**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of PPL Electric Utilities :
Corporation for Approval of a Default :
Service Program and Procurement : Docket No. P-2020-3019356
Plan for the Period June 1, 2021 :
Through May 31, 2025 :

**THE RETAIL ENERGY SUPPLY ASSOCIATION'S
PETITION TO INTERVENE**

Pursuant to 52 Pa. Code §§ 5.72-5.75 and the Pennsylvania Public Utility Commission (“Commission”) Publication Notice issued on April 10, 2020, the Retail Energy Supply Association (“RESA”)¹ petitions to intervene in the Petition of PPL Electric Utilities Corporation (“PPL” or the “Company”) for Approval of a Default Service Program and Procurement Plan for the Period June 1, 2021 Through May 31, 2025 (“DSP Petition”). In support of its intervention, RESA states as follows:

1. On March 25, 2020, PPL filed its DSP Petition, proposing to establish the terms and conditions under which it will procure default service supplies, provide default service to non-shopping customers, satisfy requirements imposed by the Alternative Energy Portfolio

¹ The comments expressed in this filing represent the position of the Retail Energy Supply Association (RESA) as an organization but may not represent the views of any particular member of the Association. Founded in 1990, RESA is a broad and diverse group of retail energy suppliers dedicated to promoting efficient, sustainable and customer-oriented competitive retail energy markets. RESA members operate throughout the United States delivering value-added electricity and natural gas service at retail to residential, commercial and industrial energy customers. More information on RESA can be found at www.resausa.org.

Standards Act ("AEPS Act")² and recover all associated costs on a full and current basis for the period from June 1, 2021 through May 31, 2025.

2. The Commission issued a Publication Notice on April 10, 2020, in which it established a deadline of March 8, 2020 for the filing of Formal Protests, Petitions to Intervene and Answers in the above-captioned proceeding.

3. RESA is a trade association of power marketers, independent power producers, and a broad range of companies within the Mid-Atlantic marketplace, each of whom support the electric services industry and seek to develop a more competitive power industry. RESA members are licensed to sell electric energy throughout the Commonwealth, including in PPL's service territory.

4. RESA's attorneys in this matter are:

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5. 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

² 73 P. S. §§ 1648.1 - 1648.8 and related provisions of 66 Pa. C. S §§ 2813-2814.

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.

6. RESA meets the standards for intervention set forth in 52 Pa. Code § 5.72(a). As an organization whose members include competitive Electric Generation Suppliers (“EGSs”) licensed to do business in the Company’s service territory, RESA has interests that will be directly affected by this proceeding. This proceeding will establish the terms and conditions under which PPL will acquire electric supply to serve its Default Service load from June 1, 2020 through May 31, 2025. The rates established pursuant to this proceeding will inform the decisions of RESA members regarding the competitive electricity products and services they will offer to retail customers in the Company’s service territory. More specifically, PPL’s proposals may impact the overall default service structure to include proposing to develop optional default service products to customers. In this regard, the ability of RESA members to provide electric supply to retail customers in the Company’s service territory will be specifically and substantially affected by the outcome of this proceeding.

7. In addition, the DSP Petition addresses various issues directly related to the ability of EGSs to provide competitive, alternative service to retail customers. For example, one way EGSs provide competitive alternative, service is by participating in the Standard Offer Program (“SOP”). As part of its DSP Petition, PPL is proposing substantial changes to the Company’s current SOP to include a brand new requirement that all participating SOP customers be automatically returned to default service at the conclusion of the 12-month SOP contract. These changes will directly impact the ability of EGSs to provide service pursuant to the SOP program. PPL is also proposing to eliminate the ability of participants in its Customer Assistance Program (referred to as “On-Track”) to avail themselves of competitive alternative

services offered by RESA members through the proposed elimination of the CAP-SOP program. The inability of low income customers who qualify for On-Track benefits to also select a competitive supplier directly impacts RESA members offering products and services in PPL's territory.

8. RESA's members will be bound by the action of the Commission in this proceeding, which will determine the Company's default service rates, terms and conditions beginning June 1, 2021, as well as the terms and conditions for the various retail market enhancement programs proposed by the Company.

9. RESA's interests in this proceeding are unique from and not adequately represented by other parties that have or may seek to intervene, including individual EGSs, or other organizations interested in electric competition in Pennsylvania in general and in the Company's service territory in particular. RESA represents the interests of a diverse and broad group of electric generation suppliers in general, and not the interests of any individual member.

10. RESA's intervention is also in the public interest. RESA will be able to offer the unique perspectives and insights of a trade association representing multiple EGSs on the various issues that will be addressed in this proceeding. It should be noted that RESA actively participated in the most recent default service proceeding that developed the current default service plans for the Company, as well as prior default service proceedings involving the Company.

WHEREFORE, RESA respectfully requests that the Commission grant RESA's Petition to Intervene.

Respectfully submitted,

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Date: May 6, 2020

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