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May 8, 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 Inspire Energy Holdings, LLC's ("Inspire") 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,

/s/ Lauren M. Burge

Lauren M. Burge, Esq.

LMB/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 Inspire Energy Holdings, LLC Petition to Intervene upon the persons listed below in the manner indicated in accordance with the requirements of 52 Pa. Code Section 1.54.

Via Email only

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Date: May 8, 2019

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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 :

**PETITION TO INTERVENE
OF INSPIRE ENERGY HOLDINGS, LLC**

Pursuant to 52 Pa. Code §§ 5.72-5.75 and the Pennsylvania Public Utility Commission (“Commission”) Publication Notice issued on April 10, 2020, Inspire Energy Holdings, LLC (“Inspire”) 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, Inspire 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 Standards Act (“AEPS Act”)¹ 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.

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

3. Inspire has been a licensed electric generation supplier (“EGS”) in Pennsylvania since September 2013.² Inspire serves customers in the service territory of PPL and focuses on providing renewable electric energy supply to create a truly transformative smart energy experience for customers. Inspire has been an active participant in the various retail market enhancements made available by PPL including the Purchase of Receivables Program, the Standard Offer Program (“SOP”) and the Customer Assistance Program Standard Offer Program (“CAP-SOP”).

4. Inspire’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 See Docket No. A-2013-2376082.

person may be in the public interest. 52 Pa. Code § 5.72(a)(3). A “person” includes a corporation. 52 Pa. Code § 1.8.

6. Inspire meets the standards for intervention set forth in 52 Pa. Code § 5.72(a). Inspire’s interests to create and offer competitive products to consumers in PPL’s service territory will be directly affected by this proceeding in several ways. First, the terms through which PPL will offer default service will be established in this proceeding. The default service structure directly impacts Inspire’s decisions about the competitive products and services that it can offer to consumers in PPL’s service territory. The result of these decisions will specifically and substantially affect Inspire.

7. Second, PPL is offering proposals related to its various retail market enhancement programs – including SOP and CAP-SOP – which will directly impact Inspire’s decisions about the products and services it can offer to consumers in PPL’s service territory. For example, requiring all customers receiving service from Inspire through the SOP to be automatically returned to PPL’s default service (as PPL is proposing) materially impacts Inspire’s decision to participate in the PPL SOP program. Similarly, the proposed termination of the CAP-SOP takes away the opportunity for Inspire to service PPL’s CAP participants which they can do now through participation in the CAP-SOP.

8. Inspire will be bound by the Commission’s action 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. Inspire’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.

10. Inspire's intervention is also in the public interest. The types of service and products that Inspire offers to customers are distinct from those of other parties. Specifically, Inspire's focus on renewable energy and participation in programs that will be affected by the outcome of this proceeding make its participation of particular value.

WHEREFORE, Inspire respectfully requests that the Commission grant its Petition to Intervene.

Respectfully submitted,

/s/ Lauren M. Burge

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Date: May 8, 2020

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