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June 23, 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 for Leave to Withdraw Intervention 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,

canne M. O'Dell

Deanne M. O'Dell, Esq.

DMO/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 for Leave to Withdraw

Intervention, 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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Deanne M. O'Dell

Date: June 23, 2020

Deanne M. O'Dell, Esq.

### BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

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Petition of PPL Electric Utilities Corporation for Approval of a Default Service Program and Procurement Plan for the Period June 1, 2021 Through May 31, 2025

Docket No. P-2020-3019356

## PETITION OF RETAIL ENERGY SUPPLY ASSOCIATION FOR LEAVE TO WITHDRAW INTERVENTION

Pursuant to 52 Pa. Code § 5.94, the Retail Energy Supply Association ("RESA")<sup>1</sup>, respectfully requests that Honorable Administrative Law Elizabeth Barnes grant this Petition for Leave to Withdraw RESA's Petition to Intervene. In support thereof, RESA states as follows:

1. On March 25, 2020, PPL Electric Utilities Corporation ("PPL") for Approval of a

Default Service Program and Procurement Plan for the Period June 1, 2021 Through May 31, 2025

("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")<sup>2</sup> and recover all associated costs on a full

and current basis.

2. On May 6, 2020, RESA filed both a Petition to Intervene and a Prehearing

Memorandum.

3. A prehearing conference was held on May 15, 2020 and, pursuant to Procedural Order dated May 15, 2020, RESA's Petition to Intervene was granted.

<sup>&</sup>lt;sup>1</sup> 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.

<sup>&</sup>lt;sup>2</sup> 73 P. S. §§ 1648. 1 - 1648.8 and related provisions of 66 Pa. C. S §§ 2813-2814.

4. Since that time, RESA has continued to evaluate PPL's proposals, issued discovery requests and reviewed the discovery responses that have been served to date. By letter dated June 9, 2020, RESA provided notice of its intent to present the testimony of Daniel Allegretti on its behalf.

5. Following this notice, RESA re-evaluated its ability to pursue its interests in this proceeding and has determined that it no longer wishes to incur the time and expense involved with being an active party to this case.

6. No party will be harmed by RESA's withdrawal from these proceedings as RESA has not served direct testimony nor has it actively participated in any informal settlement negotiations among the parties.

7. Permitting a party to withdraw from a proceeding when it no longer wishes to pursue its claims is in the public interest because it promotes judicial economy and streamlines the processing of the case.

**WHEREFORE,** the Retail Energy Supply Association respectfully requests that the Honorable Elizabeth Barnes grant this Petition for Leave to Withdraw the RESA's Petition to Intervene and permit RESA to withdraw its participation as an active party in this proceeding.

Respectfully submitted,

lanne M. O'Dell

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Date: June 23, 2020

Attorneys for Retail Energy Supply Association

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