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June 24, 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 Starion Energy PA, Inc.'s ("Starion") 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,



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 Starion'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: June 24, 2020



Deanne M. O'Dell, Esq.

**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 STARION ENERGY PA, INC.**

Pursuant to 52 Pa. Code §§ 5.72-5.75 and the Pennsylvania Public Utility Commission (“Commission”) Publication Notice issued on April 10, 2020, Starion Energy PA, Inc. (“Starion”) 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, Starion 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 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 which it established a deadline of March 8, 2020 for the filing of Petitions to Intervene., Starion is a member of the Retail Energy Supply Association (“RESA”). RESA filed a timely Petition to Intervene which was granted. Starion initially intended to participate in this proceeding as part of RESA. On June 23, 2020, RESA filed a Petition for Leave to Withdraw its intervention.

With RESA's pending withdrawal from this proceeding, Starion is seeking to intervene separately so as to protect its interests. Given the very early stages of this proceeding (direct testimony has not yet been served) and Starion's agreement to abide by the procedural schedule as already established, no party will be prejudiced by granting Starion's Petition to Intervene. On the contrary, as explained more fully below, denying Starion's Petition to Intervene will deprive it of its due process opportunity to participate in a proceeding that could have a direct impact on its ability to offer competitive electric generation service in PPL's service territory.

3. Starion has been a licensed electric generation supplier ("EGS") in Pennsylvania since February 2011.¹ Starion serves customers in the service territory of PPL and has been an active participant in the various retail market enhancements made available by PPL including the Purchase of Receivables Program and Customer Referral Standard Offer Program ("SOP").

4. Starion'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

¹ See Docket No. A=2010-2210819.

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. Starion meets the standards for intervention set forth in 52 Pa. Code § 5.72(a). Starion provides competitive electric generation service in the service territory of PPL. Proposals regarding the default service supply offered by PPL and changes to interactions between PPL (in its role as the electric distribution company) and Starion directly impact Starion’s ability to continue to offer competitive generation supply in PPL’s service territory.

7. More specifically, PPL is offering proposals related to its various retail market enhancement programs – including SOP – which will directly impact Starion’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 Starion through the SOP to be automatically returned to PPL’s default service (as PPL is proposing) materially impacts Starion’s decision to participate in the PPL SOP program. Starion plans to be an active participant in this proceeding and will serve direct testimony on June 25, 2020 in accordance with the procedural schedule that has been established.

8. Starion 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. The Commission has previously made clear that EGSs need to participate in default service proceedings in order to preserve their due process rights; and, the failure to participate could result in binding them to the outcome of the proceeding (especially if other EGSs are participating in the DSP proceeding). *See Respond Power, LLC v. Pennsylvania Electric Company, et. al.* Docket No. C-2016-2576287, Opinion and Order entered June 13,

2019. Thus, denying Starion's Petition – even though it is being filed beyond the previously established due date but before any significant action has occurred in this proceeding – could leave Starion without any other recourse in the future to challenge the decisions made in this proceeding even if they have a direct and material impact on Starion.

9. Starion'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. Starion's intervention is also in the public interest because its participation will add additional information and perspective for the Commission's consideration. The result will be to create a more complete record upon which the Commission can make a more informed final determination regarding PPL's Petition.

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

Respectfully submitted,



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