

COMMONWEALTH OF PENNSYLVANIA



OFFICE OF CONSUMER ADVOCATE

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December 30, 2020

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

Re: Petition of PECO Energy Company for Approval
of Its Act 129 Phase IV Energy Efficiency and
Conservation Plan
Docket No. M-2020-3020830

Dear Secretary Chiavetta:

Attached for electronic filing please find the Office of Consumer Advocate's Notice of Intervention and Public Statement in the above-referenced proceeding.

Copies have been served per the attached Certificate of Service.

Respectfully submitted,

/s/ Laura J. Antinucci
Laura J. Antinucci
Assistant Consumer Advocate
PA Attorney I.D. # 327217
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Enclosures:

cc: Office of Administrative Law Judge (**email only**)
Office of Special Assistants (**email only**: ra-OSA@pa.gov)
Bureau of Technical Utility Services (**email only**)
Certificate of Service

*301656

CERTIFICATE OF SERVICE

Re: Petition of PECO Energy Company :
for Approval of Act 129 Phase IV Energy : Docket No. M-2020-3020830
Efficiency and Conservation Plan :

I hereby certify that I have this day served a true copy of the following document, the Office of Consumer Advocate's Notice of Intervention and Public Statement, upon parties of record in this proceeding in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant), in the manner and upon the persons listed below:

Dated this 30th day of December 2020.

SERVICE BY E-MAIL ONLY

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Dated: December 30, 2020
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BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Re: Petition of PECO Energy Company :
for Approval of Its Act 129 Phase IV : Docket No. M-2020-3020830
Energy Efficiency and Conservation Plan :

NOTICE OF INTERVENTION
OF THE
OFFICE OF CONSUMER ADVOCATE

Pursuant to 52 Pa. Code § 5.71-5.74, the Office of Consumer Advocate hereby gives its Notice of Intervention in the above-captioned proceeding. A copy of all correspondence and notices, documents, orders or other communications with respect to the above-captioned proceeding should be addressed to the following:

Laura J. Antinucci
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Aron J. Beatty
Senior Assistant Consumer Advocate
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Respectfully submitted,

/s/Laura J. Antinucci
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DATE: December 30, 2020

PUBLIC STATEMENT OF THE OFFICE OF CONSUMER ADVOCATE
PURSUANT TO 71 P.S. SECTION 309-4(e)

Act 161 of the Pennsylvania General Assembly, 71 P.S. Section 309-2, as enacted July 9, 1976, authorizes the Consumer Advocate to represent the interests of consumers before the Pennsylvania Public Utility Commission (Commission). In accordance with Act 161, and for the following reasons, the Consumer Advocate determined to intervene and participate in the Petition of PECO Energy Company for Approval of Its Act 129 Phase IV Energy Efficiency and Conservation Plan (Petition).

On November 30, 2020, PECO Energy Company (PECO or Company) filed the Petition, pursuant to Section 2806.1 of the Public Utility Code and pursuant to the Implementation Order entered by the Commission at Docket No. M-2020-3020830 on June 18, 2020. The five-year cost of the Company's EE&C Phase IV Plan (June 1, 2021, through May 31, 2026) is projected to be \$427.4 million. PECO EE&C Plan at 9. The Company's programs are designed to produce: (1) 1,605,107 MWh in energy savings, or 116% of PECO's overall energy savings target; and (2) 327 MW of PDR, or 128% of its PDR target. *Id.* With respect to residential customers, PECO has proposed the following four residential customer energy efficiency programs: (1) The Residential (excluding low-income) Program; (2) The Income-Eligible Program; (3) The Residential Home Energy Reports Program; and (4) Income-Eligible Home Energy Reports Program. PECO EE&C Plan at 10.

The Acting Consumer Advocate determined to intervene in this proceeding to protect the interests of PECO's customers; to ensure that the proposed Plan and programs are in accordance with Act 129 and all other applicable statutes, regulations, and Commission Orders; and to ensure that any increase in rates resulting from the adoption of the proposed programs and any related expenses are just and reasonable.