

DENTONS

Clifford B. Levine
Clifford.levine@dentons.com
D +1 412.297.4998

Dentons Cohen & Grigsby
625 Liberty Ave.
Pittsburgh, PA 15222-3152

Rebecca E. Kennedy
Rebecca.kennedy@dentons.com
D +1 412.297.4998

Dentons US LLP
1900 K Street NW
Washington, D.C. 20006

April 19, 2024

VIA ELECTRONIC FILE

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Keystone Building
400 North Street, 2nd Floor
Harrisburg, PA 17120

RE: Petition of PPL Electric Utilities Corporation for Approval of Its Default Service Program and Procurement Plan for the Period from June 1, 2025 through May 31, 2029 Docket No. P-2024-3047290

Dear Secretary Chiavetta:

Enclosed for filing with the Pennsylvania Public Utility Commission ("Commission") is the Petition to Intervene of Shell Energy North America (US), L.P. in the above- referenced proceeding. As evidenced by the attached Certificate of Service, all parties to the proceeding are being served with a copy of this document.

cc: Hon. F. Joseph Brady w/enc.
Cert. of Service w/ enc.

Sincerely,

/s/ Clifford B. Levine
Clifford B. Levine, Esq.
Dentons Cohen & Grigsby
625 Liberty Ave
Pittsburgh, PA 15222-3152
412.297. 4900

/s/ Rebecca E. Kennedy
Rebecca E. Kennedy, Esq.
Dentons US LLP
1900 K Street, NW
Washington, DC 20006
*Counsel for Shell Energy North America
(US), L.P*

CERTIFICATE OF SERVICE

I hereby certify and affirm that I have this day served a copy of the **Petition of PPL Electric Utilities Corporation for Approval of Its Default Service Program for the Period from June 1, 2025 through May 31, 2029** on the following persons in the matter specified in accordance with the requirements of 52 Pa. Code § 1.54.

Via Email Only

Christy Appleby, Esquire
Office of Consumer Advocate
555 Walnut Street, 5th Floor
Harrisburg, PA 17101-1923
capplebv@paoca.org
abeatty@paoca.org

Allison Kaster, Esquire
PA Public Utility Commission
Bureau of Investigation & Enforcement
400 North Street, 2nd Floor West
P.O. Box 3265
Harrisburg, PA 17105-3265
akaster@pa.gov

Steven C. Gray, Esquire
Office of Small Business Advocate
555 Walnut Street, 1st Floor
Harrisburg, PA 17101
sgray@pa.gov

Adeolu A. Bakare, Esquire
JoAnne S. Thompson, Esquire
McNees, Wallace & Nurick LLC
100 Pine Street
Harrisburg, PA 17108-1166
abakare@mcneeslaw.com
jthompson@mmcneeslaw.com
Counsel for PPLICA

Elizabeth R. Marx, Esquire
John W. Sweet, Esquire
Ria Pereira, Esquire
Pennsylvania Utility Law Project
118 Locust Street
Harrisburg, PA 17101
emarx@pautilitylawproject.org
jsweet@pautilitylawproject.org
rpereira@pautilitylawproject.org
*Counsel for the Coalition for Affordable
Utility Service and Energy Efficiency in
Pennsylvania*

Deanne M. O'Dell, Esquire
Kristine E. Marsilio, Esquire
Eckert Seamans Cherin & Mellott, LLC
213 Market Street, 8th Floor
Harrisburg, PA 17101
dodell@eckertseamans.com
kmarsilio@eckertseamans.com
Counsel for Starion Energy PA, Inc.

Todd S. Stewart, Esquire
Hawke McKeon & Sniscak LLP
100 N. 10th Street
Harrisburg, PA 17101
tsstewart@hmslegal.com
Counsel for EGS Parties

Gregory L. Peterson, Esquire
Thomas F. Puchner, Esquire
Kevin C. Blake, Esquire
Phillips Lytle LLP
201 West Third Street, Suite 205
Jamestown, NY 14701-4907
gpeterson@phillipslytle.com
Counsel for StateWise

Lauren M. Burge, Esquire
Deanne M. O'Dell, Esquire
Eckert Seamans Cherin & Mellott, LLC 600
Grant Street, 44th Floor
Pittsburgh, PA 15219
lburge@eckertseamans.com
dodell@eckertseamans.com
Counsel for Inspire Energy

David McGregor, Esq. Michael W. Hassell,
Esq. Megan Rulli, Esq.
Post & Schell, P.C.
17 North Second Street,
12th Floor Harrisburg, PA 17101
mhassellia@postschell.com
dmacgregor@postschell.com
mrulli@postschell.com

Gregory L. Peterson, Esq.
Thomas F. Puchner, Esq.
Kevin C. Blake, Esq.
Phillips Lytle LLP
201 W. Third Street, Suite 205
Jamestown, NY 14701-4907
gpeterson@phillioslytle.com

Kenneth L. Mickens, Esquire
316 Yorkshire Drive
Harrisburg, PA 17111
Knickensl1@verizon.net
Counsel for Sustainable Energy Fund

Derrick Price Williamson, Esquire
Barry A. Naum, Esquire
Spilman Thomas & Battle
1100 Bent Creek Boulevard, Suite 101
Mechanicsburg, PA 17050
dwilliamson@spilmanlaw.com
bnaum@spilmanlaw.com
Counsel for IECPA

Kimberly A. Klock, Esq.
Michael J. Shafer, Esq.
PPL Services Corporation
Two North Ninth Street
Allentown, PA 18101
kklock@pplweb.com
mjshafer@pplweb.com

Charles E. Thomas, III, Esq.
Thomas, Niesen & Thomas, LLC
212 Locust Street, Suite 600
Harrisburg, PA 17101
Cet3@tntlawfirm.com

April 19, 2024

/s/ Clifford B. Levine
Clifford B. Levine

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of PPL Electric Utilities)
Corporation for Approval of a Default)
Service Program and Procurement Plan)
from June 1, 2025 Through May 31, 2029)
Docket No. P-2024-3047290

**PETITION TO INTERVENE OF
SHELL ENERGY NORTH AMERICA (US), LP**

Pursuant to Sections 5.71 through 5.74 of the Pennsylvania Public Utility Commission's ("PUC" or "Commission") Regulations, 52 Pa. Code §§ 5.71 - 5.74, Shell Energy North America (US), L.P. (together with its operating subsidiaries, "Shell Energy") hereby files this Petition to Intervene in the above-captioned proceeding.¹

PPL Electric Utilities Corporation ("PPL" or the Company") has petitioned the Commission for approval of the Company's sixth Default Service Program ("DSP VI"). PPL's Petition for Approval of DSP VI (the "Petition") outlines, *inter alia*, the Company's proposed procurement plan, implementation plan and contingency plan for acquiring default service energy supply for all PPL customers who, upon expiration of DSP V on May 31, 2025, do not take generation service from an alternative electric generation supplier ("EGS") or who contract for energy with an EGS, which is not delivered. *Petition of PPL Energy Co. for Approval of its Default Serv. Program for the Period from June 1, 2025 through May 31, 2029*, Docket No. P-2024- 3047290, at 1.

In support of its Petition to Intervene, Shell Energy asserts the following:

1. The proposed DSP VI would apply to all retail customers in PPL's service territory, including customers of Shell Energy.

¹ As used herein, "Shell" refers collectively to Shell Energy North America (US), L.P. and its retail subsidiaries. Shell Energy has overall responsibility for the business activities of its retail subsidiaries, which serve residential, commercial, institutional and industrial customers in Pennsylvania's retail electric and gas markets.

2. Shell Energy is an indirect subsidiary of Shell Oil Company, which itself is an indirect subsidiary of Shell plc. Shell Energy conducts business in the electric and natural gas markets throughout North America, including within PJM Interconnection, L.L.C. (“PJM”) territory. Shell Energy works with utility providers to deliver gas and power to customers in Pennsylvania. Shell Energy is a participant in the Default Service Program and state-licensed electric generation supplier in Pennsylvania. Consequently, Shell Energy has a substantial interest in and will be directly affected by the outcome of this proceeding.

3. The name and address of Shell Energy’s attorney is:

Clifford Levine (ID No. 33507)
Dentons Cohen & Grigsby
625 Liberty Ave
Pittsburgh PA 15222-3152

Rebecca E. Kennedy (ID No. 321475)
Dentons US LLP
1900 K Street
Washington, DC 20006
Phone: (202) 408-9191
Rebecca.kennedy@dentons.com

4. 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 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.

5. Shell Energy meets the standards for intervention set forth in 52 Pa. Code § 5.72(a). As Shell Energy is a participant as a supplier in the PPL Default Service Program. Shell

Energy's ability to supply customers in PPL's service territory will be specifically and substantially affected by the outcome of this proceeding, which will establish the terms and conditions under which PPL will acquire electric supply to serve its Default Service load from June 1, 2025 through May 31, 2029.

6. Shell Energy is concerned with issues that affect competitive markets in Pennsylvania, including the structure of the default service, the procurement and implementation of default service supply, utility affiliate participation, the product mix relating to default service supply and programs that could potentially harm or become a disincentive to create customized and innovative competitive retail electric products and services for its current and prospective customers.

7. Shell Energy intends to participate in this proceeding to the extent necessary to protect its interests and those of its customers. These interests cannot be adequately represented or protected by any other party.

8. As one of the nation's largest energy providers, Shell Energy's intervention is also in the public interest. Shell Energy possesses significant and unique knowledge, experience and resources with respect to the marketing of retail energy services, which will be helpful in developing a record on the reasonableness of the programs as presented. Moreover, without the opportunity to intervene, Shell Energy will be unable to participate in this proceeding but will nevertheless be bound by the actions taken by the Commission. Such actions may have a material impact on Shell Energy's operations, business and systems as well as its continued involvement in PPL's service territory as a active participant as a supplier in the Default Service programs.

9. Shell Energy continues to review the Petition and the accompanying direct

testimony and exhibits and has not yet definitively established its position on the matters presented therein. Shell Energy reserves the right to take positions and/or seek relief based on its review of the various filings, discovery responses or the positions taken by other parties in this proceeding,

10. The Commission's regulations permit intervention by a party that demonstrates an "interest which may be directly affected and which is not adequately represented by existing participants, and as to which the petitioner may be bound by the action of the Commission in the proceeding." 52 Pa. Code § 5.72 Shell Energy has a substantial and direct interest in this proceeding and satisfies the standards for intervention under these regulations. **WHEREFORE**, Shell Energy respectfully requests that the Pennsylvania Public Utility Commission grant this Petition to Intervene, providing Shell Energy with full-party status in this proceeding, as well as any other relief as it deems necessary.

Respectfully submitted,

By: /s/ Clifford B. Levine
Clifford Levine (ID No. 33507)
Dentons Cohen & Grigsby
625 Liberty Ave
Pittsburgh PA 15222-3152

/s/ Rebecca E. Kennedy
Rebecca E. Kennedy (ID No.321475)
Dentons US LLP
1900 K Street, NW
Washington, DC 20006
Phone: (202) 496-9191
Rebecca.Kennedy@dentons.com
*Counsel to Shell Energy North America (US),
L.P.*

Dated: April 19, 2024