

January 8, 2016

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

**Re: Petition of PECO Energy Company for Approval of its Act 129 Phase 111
Energy Efficiency and Conservation Plan;
Docket No: M-2015-2515691**

Dear Secretary Chiavetta:

Please find attached for filing with the Pennsylvania Public Utility Commission ("PUC" or "Commission") the **Petition to Intervene of EnerNOC**, in the above-referenced matter.

This document was filed electronically with the Commission on this date. All parties are being served a copy of this document in accordance with the enclosed Certificate of Service.

Please contact our office if you have any questions concerning this filing.

Sincerely,

TUCKER ARENSBERG, PC

By: 

Kevin L. Hall, Esquire

KLH/sed
Enclosure

cc: Administrative Law Judge Angela T. Jones (via E-mail and First Class Mail)
Administrative Law Judge Darlene D. Heep (via E-mail and First Class Mail)
Certificate of Service

HBGDB:155098-1 030489-169654

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**Petition of PECO Energy Company
For Approval of its Act 129 Phase III
Energy
Efficiency and Conservation Plan**

DOCKET No. M-2015-2515691

**PETITION TO INTERVENE OF
EnerNOC, Inc.**

TO THE HONORABLE PENNSYLVANIA PUBLIC UTILITY COMMISSION:

Pursuant to 52 Pa. Code Sections 5.71 through 5.74, EnerNOC, Inc. ("EnerNOC"), hereby files this Petition to Intervene in the above-captioned proceeding. In support thereof, EnerNOC states as follows:

1. Petitioner is EnerNOC, Inc., with an address of P.O. Box 29492, Columbus, Ohio, 43229.

2. The name and address of Petitioner's attorneys are:

Kevin L. Hall, Esquire
Scott H. Debroff, Esquire
TUCKER ARENSBERG, P.C.
2 Lemoyne Drive
Lemoyne, PA 17043
Phone: (717) 234-4121
Fax: (717) 232-6802
E-mail: khall@tuckerlaw.com
E-mail: sdebroff@tuckerlaw.com

3. On November 30, 2015, PECO Energy Company ("PECO" or "Company"), filed with the Pennsylvania Public Utility Commission ("PUC" or "Commission") a Petition for

approval of the Company's Phase III Energy Efficiency and Conservation ("EE&C") Plan ("Phase III Plan" or "Plan"), pursuant to the requirements of Act 129 of 2008, 66 Pa. C.S. 2806.1 ("Act 129") and the PUC's Implementation Order entered on June 11, 2015, at Docket No. M-2014-2424864.

4. EnerNOC provides demand response and energy efficiency programs to Pennsylvania retail customers. EnerNOC has an interest in advocating for equal opportunities for demand response providers to participate in the procurement of electric services, including in the service territory of PECO.

5. The Commission's final determination in these proceedings may directly impact the business of EnerNOC and its ability to provide demand response and energy efficiency programs in Pennsylvania and in the PECO service territory. EnerNOC therefore has a direct, substantial, and unique interest in the outcome of these proceedings that is not and cannot be adequately represented by any other party. See 52 Pa. Code § 5.72(a)(2). Therefore, EnerNOC respectfully requests that the Commission grant this Petition to Intervene and provide EnerNOC with full party status in these proceedings.

WHEREFORE, EnerNOC, Inc. requests that the Commission grant this Petition to Intervene and provide EnerNOC with full party status in this proceeding.

Respectfully submitted,



Kevin L. Hall, Esq.

PA ID No. 311826

Scott H. Debroff, Esq.

PA ID No. 61170

TUCKER ARENSBERG, PC

2 Lemoyne Drive, Suite 200

Lemoyne, PA 17043

Phone: (717) 234-4121

Fax: (717) 232-6802

E-mail: khall@tuckerlaw.com

E-mail: sdebroff@tuckerlaw.com

Dated: January 8, 2016

HBGDB:155110-1 030489-169654

VERIFICATION

I, Gregory Poulos, of EnerNOC, Inc., hereby state that the facts set forth in the foregoing Petition to Intervene of EnerNOC, Inc., are true and correct to the best of my knowledge, information, and belief. I understand that the statements made herein are made subject to 18 Pa.C.S. § 4904 (pertaining to unsworn falsification to authorities).

Date: January 7, 2016



Gregory Poulos

HBGDB:155114-1 030489-169653

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**Petition of PECO Energy Company For
Approval of its Act 129 Phase III Energy
Efficiency and Conservation Plan**

DOCKET NO. M-2015-2515691

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the Petition to Intervene foregoing document upon the following parties to this proceeding in accordance with the requirements of 52 Pa. Code

§ 1.54 (relating to service by participant).

VIA E-MAIL & FIRST-CLASS MAIL

Romulo L. Diaz, Esquire
Jack Garfinkle, Esquire
PECO Energy Company
2301 Market Street, S23-1
Philadelphia, PA 19103
romulo.diaz@exeloncorp.com
jack.garfinkle@exeloncorp.com

Thomas P. Gadsden, Esquire
Anthony C. DeCusatis, Esquire
Catherine G. Vasudevan, Esquire
Morgan Lewis and Bockius LLP
1701 Market Street
Philadelphia, PA 19103
tgadsden@morganlewis.com
adecusatis@morganlewis.com
cvasudevan@morganlewis.com

Lauren M. Burge, Esquire
Darryl Lawrence, Esquire
Office of Consumer Advocate
5th Floor Forum Place
555 Walnut Street
Harrisburg, PA 17101
lburge@paoca.org
dlawrence@paoca.org

Derrick Price Williamson, Esquire
Barry A. Naum, Esquire
Spilman Thomas & Battle PLLC
1100 Bent Creek Boulevard, Suite 101
Mechanicsburg, PA 17050
dwilliamson@spilmanlaw.com
bnaum@spilmanlaw.com
(Wal-Mart Stores East, LP and
Sam's East, Inc.)

Elizabeth Rose Triscari, Esquire
Office of Small Business Advocate
300 N. 2nd Street, Suite 202
Harrisburg, PA 17101
etriscari@pa.gov

Charis Mincavage, Esquire
Adeolu A. Bakare, Esquire
McNees Wallace & Nurick LLC
100 Pine Street
Harrisburg, PA 17108-1166
cmincavage@mwn.com
abakare@mwn.com
(Philadelphia Area Industrial Energy Users
Group)

Patrick Cicero, Esquire
Joline Price, Esquire
Elizabeth R. Marx, Esquire
Pennsylvania Utility Law Project
118 Locust Street
Harrisburg, PA 17101
pulp@palegalaid.net
(CAUSE-PA)

Heather M. Langeland, Esquire
PennFuture
200 First Avenue, Suite 200
Pittsburgh, PA 15222
langeland@pennfuture.org

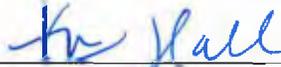
Derrick Price Williamson, Esquire
Barry A. Naum, Esquire
Spilman Thomas & Battle PLLC
1100 Bent Creek Boulevard, Suite 101
Mechanicsburg, PA 17050
dwilliamson@spilmanlaw.com
bnaum@spilmanlaw.com
(Wal-Mart Stores East, LP and
Sam's East, Inc.)

Carl R. Shultz, Esquire
Eckert Seamans Cherin & Mellott LLC
213 Market Street, 8th Floor
Harrisburg, PA 17101
cshultz@eckertseamans.com
(Comverge, Inc.)

Scott H. DeBroff, Esquire
Tucker Arensberg, PC
2 Lemoyne Drive, Suite 200
Lemoyne, PA 17043
sdebroff@tuckerlaw.com
Counsel for Nest Labs, Inc.

Respectfully Submitted,

TUCKER ARENSBERG, P.C.



Kevin L. Hall, Esquire
(Pa. Bar No. 311826)
2 Lemoyne Drive, Suite 200
Lemoyne, PA 17043
Phone: (717) 234-4121
Fax: (717) 232-6802
E-mail: khall@tuckerlaw.com

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