

COMMONWEALTH OF PENNSYLVANIA



DARRYL A. LAWRENCE  
Consumer Advocate

OFFICE OF CONSUMER ADVOCATE  
555 Walnut Street, 5th Floor, Forum Place  
Harrisburg, Pennsylvania 17101-1923  
(717) 783-5048  
(800) 684-6560

 @pa\_oca  
 /pennoca  
FAX (717) 783-7152  
consumer@paoca.org  
www.oca.pa.gov

December 9, 2025

**Via Electronic Filing**

Matthew L. Homsher, 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 V Energy  
Efficiency and Conservation plan  
Docket No. M-2025-3057328

Dear Secretary Homsher:

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

Copies have been served on the parties as indicated on the enclosed Certificate of Service.

Respectfully submitted,

/s/ Katie Kennedy  
Katherine "Katie" Kennedy, Esq.  
Assistant Consumer Advocate  
PA Attorney I.D. # 317237  
E-Mail: KKennedy@paoca.org

Enclosures

cc: The Honorable Charles E. Rainey, Jr. (Email Only: [crainey@pa.gov](mailto:crainey@pa.gov))  
Paul Diskin, TUS (Email Only: [pdiskin@pa.gov](mailto:pdiskin@pa.gov))  
Darren Gill, TUS (Email Only: [dgill@pa.gov](mailto:dgill@pa.gov))  
Certificate of Service

CERTIFICATE OF SERVICE

Petition of PECO Energy Company for :  
Approval of its Act 129 Phase V Energy : Docket No. M-2025-3057328  
Efficiency and Conservation plan :

I hereby certify that I have this day filed electronically on the Commission's electronic filing system and served a true copy of the following document, the Office of Consumer Advocate's Notice of Intervention and Public Statement in this proceeding, 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 9th day of December 2025.

SERVICE BY E-MAIL ONLY

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

Allison C. Kaster, Esq.  
Bureau of Investigation and Enforcement  
PA Public Utility Commission  
Commonwealth Keystone Building  
400 North Street, 2nd Floor West  
Harrisburg, PA 17120  
akaster@pa.gov  
*Counsel for I&E*

Robert M. Routh  
NRDC Policy Director, Pennsylvania  
Climate & Energy  
1152 15th Street NW  
Suite 300  
Washington, DC 20005-1723  
rrouth@nrdc.org

Kenneth M. Kulak, Esq.  
Catherine G. Vasudevan, Esq.  
Morgan, Lewis & Bockius LLP  
2222 Market Street  
Philadelphia, PA 19103-3007  
Ken.kulak@morganlewis.com  
Catherine.vasudevan@morganlewis.com  
*Counsel for PECO Energy Company*

Susan E. Bruce, Esq.  
Charis Mincavage, Esq.  
Rebecca Kimmel, Esq.  
McNees Wallace & Nurick LLC  
100 Pine Street  
Harrisburg, PA 17108-1166  
sbruce@mcneeslaw.com  
cmincavage@mcneeslaw.com  
rkimmel@mcneeslaw.com  
*Counsel for IECPA*

Elizabeth R. Marx, Esq.  
John W. Sweet, Esq.  
Ria Pereira, Esq.  
Levi A. Phillips, Esq.  
Lauren N. Berman, Esq.  
Pennsylvania Utility Law Project  
118 Locust Street  
Harrisburg, PA 17101  
pulp@pautilitylawproject.org  
*Counsel for CAUSE-PA*

Anthony E. Gay, Esq.  
Jack R. Garfinkle, Esq.  
Matthew N. Korenoski, Esq.  
Exelon Corporation  
2301 Market Street  
Philadelphia, PA 19103  
Anthony.gay@exeloncorp.com  
Jack.garfinkle@exeloncorp.com  
Matthew.korenoski@exeloncorp.com  
*Counsel for Exelon*

Charis Mincavage, Esq.  
Adeolu A. Bakare, Esq.  
McNees Wallace & Nurick LLC  
100 Pine Street  
Harrisburg, PA 17108-1166  
cmincavage@mcneeslaw.com  
abakare@mcneeslaw.com  
*Counsel for PAIEUG*

Charlotte Edelstein, Esq.  
Joline R. Price, Esq.  
Robert W. Ballenger, Esq.  
Benjamin Clark, Esq.  
Community Legal Services, Inc.  
1424 Chestnut Street  
Philadelphia, PA 19102  
cedelstein@clsphila.org  
jprice@clsphila.org  
rballenger@clsphila.org  
bclark@clsphila.org  
*Counsel for TURN*

/s/ Katie Kennedy

Katherine "Katie" Kennedy  
Assistant Consumer Advocate  
PA Attorney I.D. # 317237  
E-Mail: KKennedy@paoca.org

Office of Consumer Advocate  
555 Walnut Street  
5th Floor, Forum Place  
Harrisburg, PA 17101-1923  
Phone: 717-783-5048  
Fax: 717-783-7152

Oliva M. Spergel  
Assistant Consumer Advocate  
PA Attorney I.D. # 337929  
Email: OSpergel@paoca.org  
Email: OCAPhaseVPECO25@paoca.org

Dated: December 9, 2025

Counsel for:  
Darryl A. Lawrence  
Consumer Advocate

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Petition of PECO Energy Company :  
for Approval of Its Act 129 Phase V : Docket No. M-2025-3057328  
Energy Efficiency and Conservation Plan :

---

NOTICE OF INTERVENTION  
OF THE  
OFFICE OF CONSUMER ADVOCATE

---

Pursuant to 52 Pa. Code § 5.71-5.74 and 71 P.S. § 309-4, the Office of Consumer Advocate hereby intervenes in the above-captioned proceeding through this Notice of Intervention and Public Statement. A copy of all correspondence and notices, documents, orders or other communications with respect to the above-captioned proceeding should be addressed to the undersigned counsel at the contact information shown in the signature line.

Respectfully submitted,

Counsel for:  
Darryl Lawrence, Consumer Advocate  
Office of Consumer Advocate

555 Walnut Street  
5th Floor, Forum Place  
Harrisburg, PA 17101-1923  
Phone: 717-783-5048  
Fax: 717-783-7152

Dated: December 9, 2025

/s/ Olivia M. Spergel  
Olivia M. Spergel  
Assistant Consumer Advocate  
PA Attorney I.D. #337929

Katherine “Katie” Kennedy  
Assistant Consumer Advocate  
PA Attorney I.D. # 317237

OCA Group E-Mail:  
[OCAPhaseVPECO25@paoca.org](mailto:OCAPhaseVPECO25@paoca.org)

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 V Energy Efficiency and Conservation Plan (Petition).

On December 1, 2025, PECO Energy Company (PECO) 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-2025-3052826 on June 18, 2025. The five-year costs of PECO's EE&C Phase V Plan (June 1, 2026, through May 31, 2031) are projected to be \$427.4 million. Petition at 9. PECO claims that its Phase V programs are designed to produce: (1) 1,458,076 MWh in energy savings, or 131% of PECO's overall energy savings target; and (2) 264.5 MW of PDR, or 136% of its PDR target. *Id.* at 1. With respect to residential customers, PECO has proposed the following four residential customer energy efficiency programs: (1) The Residential Program; (2) The Residential Low-Income Subprogram; (3) The Residential Home Energy Reports (HER) Program; and (4) Residential Low-Income HER Subprogram. *Id.* at 9-10.

The 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; to ensure that any changes in service resulting from the adoption of the proposed programs are safe, reasonable, adequate, and efficient; and to ensure that any changes in rates resulting from the adoption of the proposed programs and any related expenses are just and reasonable.



Commonwealth of Pennsylvania  
**Pennsylvania Public Utility Commission**  
 Harrisburg, PA 17105-3265  
**EFILING - FILING DETAIL**

<b>Date Created</b>	<b>Filing Number</b>
12/9/2025	2933693

Your filing has been electronically received. Upon review of the filing for conformity with the Commission's filing requirements, a notice will be issued acknowledging acceptance or rejection (with reason) of the filing. The matter will receive the attention of the Commission and you will be advised if any further action is required on your part.

The date filed on will be the current day if the filing occurs on a business day before or at 4:30 p.m. (EST). It will be the next business day if the filing occurs after 4:30 p.m. (EST) or on weekends or holidays.

**Docket Number:** M-2025-3057328

**Case Description:**

**Transmission Date:** 12/9/2025 2:24 PM

**Filed On:** 12/9/2025 2:24 PM

**eFiling Confirmation Number:** 2933693

File Name	Document Type	Upload Date
OCA Notice of Intervention and Public Statement.pdf	Notice of Intervention	12/9/2025 2:24:29 PM

For filings exceeding 250 pages, the PUC is requiring that filers submit one paper copy to the Secretary's Bureau within three business days of submitting the electronic filing online. Please mail the paper copy along with copy of this confirmation page to Secretary, Pennsylvania Public Utility Commission, 400 North Street, Harrisburg PA 17120 a copy of the filing confirmation page or reference the filing confirmation number on the first page of the paper copy.

**No paper submission is necessary for filings under 250 pages.**

You can view a record of this filing and previous filings you have submitted to the PUC by using the links in the Filings menu at the top of the page. Filings that have been submitted within the last 30 days can be viewed by using the Recent Filings link. Older filings can be viewed by using the search options available in the Filing History link.

**From:** [eFile@pa.gov](mailto:eFile@pa.gov)  
**To:** [McEvoy, Aiden J.](#)  
**Cc:** [EFiling-Alternate](#)  
**Subject:** E-file Confirmation for 2933693  
**Date:** Tuesday, December 9, 2025 3:26:35 PM  
**Importance:** High

---

Dear Aiden J. McEvoy,

Your eFiling has been successfully filed on Tue Dec 09 14:24:55 EST 2025.  
You may view this Filing at

[Notice of Intervention - OCA](#) and the Case details are: {Bp8CaseID=3057328,  
DocketNumber=M-2025-3057328}

Thank You,  
Public Utility Commission  
Commonwealth of Pennsylvania

*\* Please do not respond to this automatically generated email.*