

IN THE CIRCUIT COURT FOR QUEEN ANNE'S COUNTY

PETITION OF)
)
The Office of People's Counsel)
)
FOR JUDICIAL REVIEW)
OF THE DECISION OF THE) Civil No. 17-C-15-019974
)
Maryland Public Service Commission)
)
IN THE MATTER OF)
The Merger of Exelon Corporation)
and Pepco Holdings, Inc., Case No. 9361)

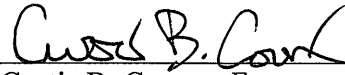
**RESPONSE OF PUBLIC CITIZEN, INC. TO THE PETITION FOR JUDICIAL
REVIEW FILED BY THE OFFICE OF PEOPLE'S COUNSEL**

In accordance with Maryland Rule 7-204, Public Citizen, Inc., by its undersigned counsel, responds to the Petition for Judicial Review filed on June 11, 2015 with this Honorable Court by the Maryland Office of People's Counsel. Public Citizen, Inc. is entitled by law to be a party to these proceedings, as it was recognized as an intervenor in Case No. 9361 by the Maryland Public Service Commission. Pursuant to Maryland Code Ann., Public Utilities, § 3-106(c)(1), an "[i]ntervenor has all the rights of a party to the proceeding."

Public Citizen intends to participate in this action for judicial review, including by raising the conflict of interest of one of the Commissioners of the Public Service Commission, who cast a deciding vote in the Commission's 3-2 decision under review and subsequently accepted a senior position at the Alliance to Save Energy, which receives substantial funding from the Exelon Corporation. Further, the Board of Directors of the Alliance to Save Energy is vice-chaired by Exelon Corporation's Senior Strategy Officer, and includes a Director who offered

testimony on behalf of Exelon Corporation and Pepco in the proceedings under review before the Public Service Commission.

Respectfully submitted,



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CERTIFICATE OF SERVICE

I hereby certify on this 22nd day of June, 2015, that a copy of the foregoing Response of Public Citizen, Inc. to the Petition for Judicial Review Filed by the Office of People's Counsel was sent by first class mail, postage prepaid, to:

Paula M. Carmody, Esq.
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