

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

Joint Petition for Consolidation of Proceedings	:	Docket Numbers (Consolidated)
and Approval of Energy Efficiency and	:	M-2009-2092222
Conservation Plans of Metropolitan Edison	:	M-2009-2112952
Company, Pennsylvania Electric Company,	:	M-2009-2112956
and Pennsylvania Power Company	:	

**PETITION TO INTERVENE OF REPRESENTATIVE CAMILLE "BUD" GEORGE OF THE
HOUSE OF REPRESENTATIVES OF THE COMMONWEALTH OF PENNSYLVANIA**

TO THE HONORABLE, THE PENNSYLVANIA PUBLIC UTILITY COMMISSION:

1. Representative Camille "Bud" George of the Commonwealth of Pennsylvania, through counsel, Edward P. Yim, hereby Petitions to Intervene in the above-captioned proceeding pursuant to the provisions of the Rules of Practice and Procedure of the Pennsylvania Public Utility Commission (PUC or Commission), 52 Pa. Code Sections 5.71-5.74, and states as follows:

2. On July 1, 2009, in accordance with the requirements of Act 129 and Commission Implementation Order, entered January 16, 2009, Metropolitan Edison, Pennsylvania Power and Pennsylvania Electric Companies ("the Companies") filed their Act 129 EE&C Plans and Joint Petition to Consolidate with the Commission at Docket Numbers M-2009-2092222, M-2009-2112952, and M-2009-2112956, respectively. On July 29, 2009, Representative Camille "Bud" George filed a Petition to Intervene in this proceeding.

3. The EE&C Plan addresses how the Companies plan to meet consumption reduction requirements of Act 129.

4. Act 129 directs electric distribution companies to "state the manner in which the plan will achieve the requirements of the program under subsection (a) (providing for energy efficiency and conservation program) and will achieve or exceed the required reductions in consumption under subsection (c) (relating to reducing consumption) and (d) (relating to peak demand)."¹

¹ 66 Pa. C.S. § 2806.1(b)(1)(i)(D).

5. The Commission, in its Implementation Order, noted:

There are clear requirements in the Act regarding proportionate measures for low-income customers (within a residential customer class) as well as for governments, schools, etc. (within a commercial customer class). Beyond those requirements, we believe that EDCs should develop plans to achieve the most energy savings per expenditure.²

6. The Companies propose an EE&C Plan intended to address and comply with the requirements of ACT 129, including the residential and governmental/non-profit sector programs.

7. Petitioner, Camille "Bud" George resides within First Energy Companies' service territory and is a customer of the Companies. Petitioner's district office, leased by the House Democratic Caucus of the Commonwealth of Pennsylvania, is also located within the Companies' service territory and is a customer. Petitioner, both as a resident and as a member of the House of Representatives, relies on the Companies for his electricity, including heating and cooling needs, and will be affected by the issues presented in this proceeding. In particular, he is potentially eligible to participate in and receive the benefits of the Companies' Act 129 Energy Efficiency and Conservation (EE&C) Plans; he will also share the costs of the EE&C plans as a ratepayer. He therefore has a direct, immediate, substantial, and distinct interest in the Companies' Petition for Approval.

8. Petitioner seeks to intervene to ensure that his interests are protected and advanced in this proceeding. His interests as a residential ratepayer and a member of the House of Representatives are not adequately represented by other participants in this proceeding.

9. Further, Petitioner was the primary sponsor of the bill that became Act 129 and has expertise in matters regarding Act 129.

10. In this proceeding the Commission will determine, prior to approval, whether the Companies' EE&C Plans are in compliance and accord with all Act 129 requirements.

11. Petitioner intends to address whether the measures for the residential and

² Energy Efficiency and Conservation Program Implementation Order, Docket No. M-2008-2069887 (Order entered January 15, 2009), at 22.

governmental/non-profit sectors under the proposed EE&C Plans would meet or exceed the required reduction in consumption as mandated by Act 129; and whether the Plans fail to consider measures that could help meet or exceed the required reductions in consumption.

12. Petitioner is represented by Edward P. Yim, who shall be the sole attorney receiving service of all documents in this proceeding at the following address:

Edward P. Yim, Esq., Office of Representative Camille "Bud" George, Chairman of the Environmental Resources and Energy Committee, House of Representatives, 4 East Wing, P.O. Box 202074, Harrisburg, PA, 17120. The telephone number is 717-772-2046 and electronic mail address is: eyim@pahouse.net.

WHEREFORE, Petitioner Camille "Bud" George respectfully requests that the Pennsylvania Public Utility Commission grant this Petition to Intervene and make such other order as is just and appropriate.

Respectfully submitted by:



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July 29, 2009