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August 30, 2012

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

VIA ELECTRONIC FILING

RE: Petition of PPL Electric Utilities Corporation For an Evidentiary Hearing on the Energy Efficiency Benchmarks Established for the Period June 1, 2013 through May 31, 2016; Docket No. P-2012-2320369

Dear Secretary Chiavetta:

Enclosed please find for filing with the Pennsylvania Public Utility Commission ("PUC" or "Commission") the original Petition to Intervene of PP&L Industrial Customer Alliance ("PPLICA") concerning the above-referenced proceeding.

Please date stamp the extra copy of this transmittal letter and Petition, and kindly return them for our filing purposes. Thank you.

Very truly yours,

McNEES WALLACE & NURICK LLC

By

A handwritten signature in black ink, appearing to read 'Adeolu A. Bakare', written over a horizontal line.

Adeolu A. Bakare

Counsel to PP&L Industrial Customer Alliance

Enclosures

c: Administrative Law Judge Elizabeth H. Barnes (via e-mail and Hand Delivery)
Certificate of Service

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CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the foregoing document upon the participants listed below in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

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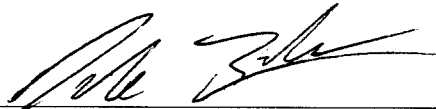
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Adeolu A. Bakare

Counsel to PP&L Industrial Customer Alliance

Dated this 30th day of August, 2012, at Harrisburg, Pennsylvania.

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of PPL Electric Utilities Corporation :
For an Evidentiary Hearing on the Energy : Docket No. P-2012-2320369
Efficiency Benchmarks Established for the Period :
June 1, 2013 through May 31, 2016 :

**PETITION TO INTERVENE
OF THE PP&L INDUSTRIAL CUSTOMER ALLIANCE**

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, the PP&L Industrial Customer Alliance ("PPLICA") hereby submits this Petition to Intervene in the Commission's proceeding regarding the Energy Efficiency and Conservation Program. In support thereof, PPLICA states as follows:

1. Petitioner is PPLICA, which, for purposes of this proceeding, includes the companies listed in Appendix A of this Petition. The list in Appendix A will be updated if necessary during this proceeding.

2. The names and address of PPLICA's attorneys are:

Pamela C. Polacek (I.D. No. 78276)
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PPLICA requests that the names and address of its attorneys be added to the service list of the Commission and all other parties.

3. PPLICA is an ad hoc association of energy-intensive commercial and industrial customers receiving electric service in PPL's service territory. PPLICA members purchase service from PPL primarily under Rate Schedules LP-4, LP-5, LP-6, IS-P, and IS-T, as well as available riders¹ PPLICA members collectively consume approximately 1.74 billion kWh of electricity each year in manufacturing and other operational processes. Electricity costs, therefore, comprise a significant portion of PPLICA members' total production costs.

4. On August 20, 2012, PPL Electric Utilities Corporation ("PPL" or "Company") filed a Petition of PPL Electric Utilities Corporation for an Evidentiary Hearing ("Petition") in the above-captioned docket. The Petition requested an evidentiary hearing concerning consumption reduction targets established by the Energy Efficiency and Conservation Program, Implementation Order, at Docket Nos. M-2011-2289411 and M-2008-2069887 (Order Entered August 3, 2012) ("Implementation Order").

5. Pursuant to the Implementation Order, the consumption reduction targets for Phase II Energy Efficiency and Conservation ("EE&C") Plans would become final for any EDC that does not request an evidentiary hearing by August 20, 2012. Based on alleged issues of material fact regarding the information relied upon by the Commission in adopting the consumption reduction requirements and concerns regarding the ability of EDCs to request modifications of Phase II targets due to subsequent changes to the Technical Reference Manual ("TRM"), PPL filed the aforementioned Petition with the Commission.

6. As noted above, PPLICA members are large consumers of electricity and related services. As large electricity consumers in PPL's service territory, PPLICA members are assessed a monthly surcharge to fund PPL's EE&C Plan and are eligible to participate in the program measures available to large commercial and industrial customers. As ratepayers and

¹ Some PPLICA members also have accounts on Rate Schedules GS-1 and GS-3.

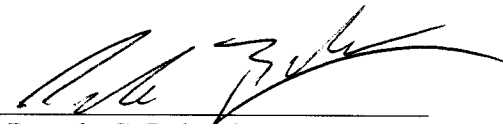
eligible program participants, PPLICA members would be directly impacted by any change in PPL's consumption reduction target. Accordingly, PPLICA has an interest in this proceeding that is not represented by any other party of record; consequently, PPLICA satisfies the standards for intervention under Section 5.72 of the Commission's regulations. See 52 Pa. Code § 5.72.

WHEREFORE, for the reasons stated above, the PP&L Industrial Customer Alliance respectfully requests that the Commission grant this Petition to Intervene and provide PP&L Industrial Customer Alliance with full party status in any formal proceedings held in the above-captioned docket.

Respectfully submitted,

McNEES WALLACE & NURICK LLC

By



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Dated: August 30, 2012

APPENDIX A


**MEMBERS OF
PP&L INDUSTRIAL CUSTOMER ALLIANCE**

Air Products and Chemicals, Inc.
Armstrong World Industries, Inc.
General Dynamics-OTS Scranton
Hercules Cement Company
Linde, LLC
SAPA Extrusions, Inc.
The Hershey Company
TIMET North America
Wegmans Food Markets, Inc.

AFFIDAVIT

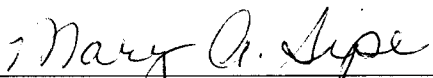
COMMONWEALTH OF PENNSYLVANIA)
)
COUNTY OF DAUPHIN) ss:

Adeolu A. Bakare, being duly sworn according to law, deposes and says that he is counsel to the PP&L Industrial Customer Alliance ("PPLICA"), that in this capacity he is authorized to and does make this affidavit for them, and that the facts set forth in the foregoing Petition to Intervene are true and correct to the best of his knowledge, information, and belief.



Adeolu A. Bakare

SWORN TO and subscribed before
me this 30th day of August, 2012.



Notary Public

COMMONWEALTH OF PENNSYLVANIA
Notarial Seal
Mary A. Sipe, Notary Public
City of Harrisburg, Dauphin County
My Commission Expires March 19, 2013

(SEAL)