

# BURKE VULLO REILLY ROBERTS

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August 29, 2012

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PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

**VIA FEDERAL EXPRESS**

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

P-2012-2320369

RE: Energy Efficiency and Conservation Program  
In Re: PPL Petition for Reconsideration/Evidentiary Hearing  
Docket Nos: ~~M-2012-2289411~~  
~~M-2008-2069887~~

Dear Secretary Chiavetta:

Enclosed please find an original and three copies of CEO's Petition to Intervene for filing in the above-referenced matter. As indicated in the attached Certificate of Service all parties are being served.

If you need anything further from me in order to effect filing please advise.

Respectfully yours,

JOSEPH L. VULLO

JLV/lm  
encls.

cc: Per Certificate of Service

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SECRETARY'S BUREAU

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**Energy Efficiency and Conservation Program**

**In Re: PPL Petition for Reconsideration/Evidentiary Hearing**

**Docket Nos: M-2012-2289411  
M-2008-2069887**

**COMMISSION ON ECONOMIC OPPORTUNITY PETITION TO INTERVENE**

NOW COMES, the Commission on Economic Opportunity (CEO), by and through counsel, Joseph L. Vullo, Esquire, and petitions to intervene in the above-captioned matter averring as follows:

1. The Petitioner, Commission on Economic Opportunity, is a not-for-profit corporation organized and existing under the laws of the Commonwealth of Pennsylvania with its principal office located at 165 Amber Lane, P.O. Box 1127, Wilkes-Barre, Luzerne County, Pennsylvania, 18703-1127. CEO's telephone number is (570) 826-0510.

2. CEO is an advocate for its clients - the low income population of Luzerne County - and has been directly involved in assuring that low income persons' utility costs are contained through counseling, advice, payment assistance and energy conservation measures.

3. CEO seeks permission to intervene in the recently filed Petition for Reconsideration and Petition for Evidentiary Hearing filed by PPL Electric Utilities Corporation and assigned to the above-captioned matter.

4. CEO is a customer of PPL Electric Utilities Corporation and CEO serves clients who are customers of PPL.

5. CEO also provides weatherization services on behalf of PPL to PPL customers, and clients of CEO, including services under Act 129.

6. The sole purpose of CEO intervening in this proceeding is to monitor this proceeding for its impact on low income customers. CEO does not anticipate presenting testimony or argument in this case but reserves the right to do so.

7. CEO has intervened and has been granted intervention and active party status in prior rate and/or acquisition cases and other proceedings before the Pennsylvania Public Utility Commission.

8. CEO's participation as a party in this proceeding is required to protect its substantial interests and the substantial interests of the low income citizens it represents in ensuring that they have access to Act 129 measures. Accordingly, CEO's participation in this proceeding will serve the public interest.

9. Because CEO represents low income citizens in the Company's service area, the interests of its clients are not protected by any other party to this action.

WHEREFORE, the Commission on Economic Opportunity respectfully requests that the Commission:

1. Receive for filing and docket this Petition to Intervene in order that CEO be a party to such proceedings and be placed on all service lists.

2. Grant to CEO active party status with the right to participate in all proceedings relative to this matter.

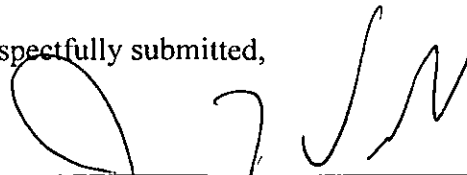
3. Order that the following individual be designated as CEO's recipient for service:

Joseph L. Vullo, Esquire  
1460 Wyoming Avenue  
Forty Fort, PA 18704  
Phone: (570) 288-6441  
Fax: (570) 288-4598  
e-mail: [jlvullo@aol.com](mailto:jlvullo@aol.com)

4. Order that each party to the proceedings provide CEO's designated recipient with copies of all papers filed.

5. Grant such other relief as the Commission may deem necessary and proper.

Respectfully submitted,



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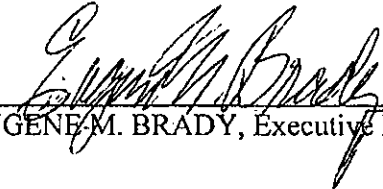
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**VERIFICATION**

I, EUGENE M. BRADY, Executive Director of Commission on Economic Opportunity, hereby verify that I am authorized to execute this Verification and that the facts set forth in the foregoing Petition to Intervene are true and correct to the best of my knowledge, information and belief.

COMMISSION ON ECONOMIC  
OPPORTUNITY

BY:

  
EUGENE M. BRADY, Executive Director

Dated: 8/28/12

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**CERTIFICATE OF SERVICE**

AND NOW, this 29th day of August, 2012, I, Joseph L. Vullo, Esquire, counsel for CEO, hereby certify that I served the attached Petition to Intervene on the following by United States First Class Mail:

Paul E. Russell  
Associate General Counsel  
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Office of General Counsel  
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American Council for an Energy  
Efficient Economy  
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Pennsylvania Weatherization Providers  
Task Force  
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Wilkes-Barre, PA 18703

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SECRETARY'S BUREAU

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New Voices Pennsylvania  
Women of Color for Reproductive Justice  
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Pittsburgh, PA 15206

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A Center for Action Against Hunger  
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Lindsay Patterson  
President USW Local 404  
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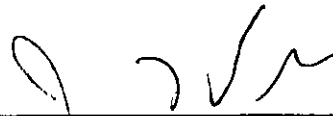
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Respectfully submitted,



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 1460 Wyoming Avenue

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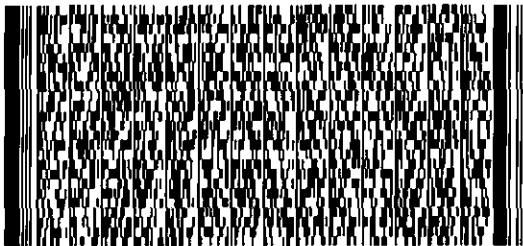
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 PA Public Utility Commission  
 Commonwealth Keystone Building  
 400 North Street, 2nd Floor  
 HARRISBURG, PA 17120

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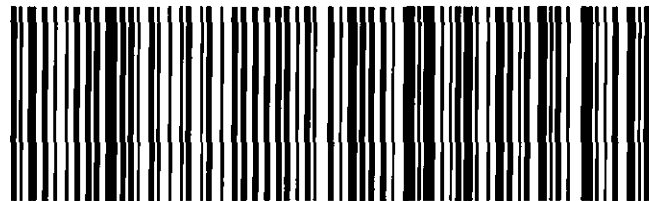
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