

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

PPL Electric Utilities Corporation – Petition :  
For Approval of Act 129 Phase II Energy : Docket No. M-2012-2334388  
Efficiency & Conservation Plan :

**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 PPL Electric Utilities Corporation's Petition for Approval of Act 129 Phase II Energy Efficiency & Conservation Plan filed with the Commission.

4. PPL Electric Utilities Corporation serves customers in numerous counties including Luzerne County. Additionally, CEO is a customer of PPL Electric.

5. CEO seeks permission to intervene in this matter to address in large part the portion of the Company's Plan that concerns low income customers. CEO reserves the right to address other parts of the Company's plan.

6. CEO's participation as an active 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 receive the energy consumption benefits as required under Act 129. Accordingly, CEO's participation in this proceeding will serve the public interest.

7. Because CEO represents low income citizens in Luzerne County, the interests of its clients are not being protected by any other party to this action.

### **POSITIONS**

8. CEO reserves the right to address all portions of the Company's Plan but its main purpose is to address that portion of the Plan that addresses low income customers.

9. There is a substantial public interest in ensuring that low income customers receive the consumption reduction benefits as required under Act 129.

10. CEO has been an active participant in this Company's prior requests for rate increases and other proceedings filed by this Company with the PUC.

### **REQUEST FOR RELIEF**

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.

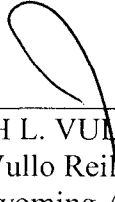
3. Order that the following individual be designated as CEO's recipients for service:

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 recipients 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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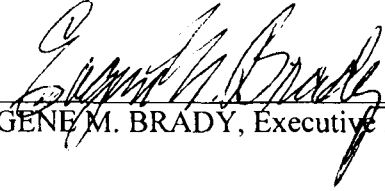
JOSEPH L. VULLO, ESQUIRE  
Burke Vullo Reilly/Roberts  
1460 Wyoming Avenue  
Forty Fort, PA 18704  
(570) 288-6441  
e-mail: [jlvullo@aol.com](mailto:jlvullo@aol.com)

**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: 12/6/2012

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**CERTIFICATE OF SERVICE**

The undersigned certified that he served a copy of the foregoing Commission on Economic Opportunity's Petition to Intervene upon the following participants this 6<sup>th</sup> day of December, 2012, via first-class mail:

David B. MacGregor, Esquire  
Post & Schell  
Four Penn Center  
1600 JFK Boulevard  
Philadelphia, PA 19103-2808


Bureau of Investigation & Enforcement  
Pennsylvania Public Utility Commission  
P.O. Box 3265  
Commonwealth Keystone Building  
400 North Street, 3<sup>rd</sup> Floor  
Harrisburg, PA 17105-3265

Andrew S. Tubbs, Esquire  
Post & Schell, PC  
17 North Second Street  
12<sup>th</sup> Floor  
Harrisburg, PA 17101-1601

Office of Consumer Advocate  
5<sup>th</sup> Floor Forum Place  
555 Walnut Street  
Harrisburg, PA 17101-1923

Paul E. Russell, Esquire  
PPL Services Corporation  
Two North Ninth St., GENTW3  
Allentown, PA 18106

Office of Small Business Advocate  
300 North Second Street  
Suite 1102  
Harrisburg, PA 17101

  
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JOSEPH L. VULLO, ESQUIRE  
I.D. No. 41279  
1460 Wyoming Avenue  
Forty Fort, PA 18704  
(570) 288-6441  
e-mail: [jlvullo@bvrrlaw.com](mailto:jlvullo@bvrrlaw.com)  
Attorney for Commission on Economic  
Opportunity