

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of PPL Electric Utilities Corporation :
for Approval of its Act 129 Phase II : M-2012-2334388
Energy Efficiency and Conservation Plan :

**PETITION TO INTERVENE OF
CITIZENS FOR PENNSYLVANIA'S FUTURE**

Now comes Citizens for Pennsylvania's Future ("PennFuture"), by counsel, Heather M. Langeland, and hereby Petitions to Intervene in the above captioned matter. Petitioner requests that the Pennsylvania Public Utility Commission ("Commission") grant Petitioner status as Intervenor in these proceedings concerning the Act 129 Petition filed November 15, 2012 by PPL Electric Utilities Corporation ("PPL"). Petitioner provides the following in support of its Petition to Intervene:

1. Petitioner is PennFuture, a Pennsylvania nonprofit corporation with offices in Philadelphia, West Chester, Wilkes-Barre, Harrisburg, and Pittsburgh, Pennsylvania (www.pennfuture.org). PennFuture's principal business location is 610 North Third Street, Harrisburg, PA 17101, tel. (717) 214-7920. PennFuture has members who live in the PPL service territories, are customers of PPL and/or receive service from PPL. PennFuture engages in policy development, public education,

litigation and other strategies to achieve its goals, including promoting clean energy and energy efficiency.

2. The name and address of counsel for Petitioner is:

Heather M. Langeland, Staff Attorney
PennFuture
200 First Ave., Suite 200
Pittsburgh, PA 15222
Phone: 412-258-6684
Fax: 412-258-6685
langeland@pennfuture.org

3. On or about November 15, 2012, PPL, pursuant to the requirements of Act 129 of 2008, 66 Pa. C.S. §2806.1, petitioned the Commission for approval of PPL's Phase II Energy Efficiency and Conservation Plan ("Petition").

4. Pursuant to the *Implementation Order* entered August 3, 2012 at Docket Nos. M-2012-2289411 and M-2008-2069887 ("Implementation Order") all Answers and Comments to any such proposed plan is due within 20 days of publication of notice in the *Pennsylvania Bulletin*. Said publication was completed on December 1, 2012, making this Petition timely.

5. The Petitioner, on behalf of its members and the public interest, have an interest in ensuring that PPL's Energy Efficiency and Conservation ("EE&C") plan is in accordance with Act 129 and provides a robust and comprehensive package of energy efficiency measures and programs that will result in cost-effective electricity savings that will protect public health, preserve the environment, reduce energy prices, and maintain grid reliability. Petitioner's members are directly and personally affected by the Proceedings because any modification to PPL's Phase II Plan may impact the ability of those members to participate in energy efficiency programs and benefit from resulting

reductions in their electric bills. Petitioner's members depend on electric distribution service from PPL to meet basic necessities of life, and risk health and financial consequences if service is not provided in a reliable, clean, and affordable manner provided by maximum investment in energy efficiency allowed through Act 129.

6. Specifically, this action directly impacts PennFuture and its members including but not limited to the following: PennFuture owns and uses offices at 610 North Third Street, Harrisburg, PA 17101, which receives electric service from PPL. PennFuture also has members who live in the PPL service territory, are customers of PPL, and receive electrical service from PPL.

7. Petitioner has a right and interest in assuring that safe, reliable, clean and affordable public utility service, and participation in these Proceedings is an appropriate way to protect these rights and interests. Petitioner may intervene in this proceeding pursuant to 52 Pa. Code §§ 5.71-74.

8. PennFuture has participated in the PPL Act 129 stakeholder input process, and submitted comments to the Commission in the matter captioned *Energy Efficiency and Conservation Program*, Docket Nos. M-2012-2289411 and M-2008-2069887.

9. Petitioner has interests in and perspectives on issues in this proceeding that are not adequately represented by other parties of record.

10. Petitioner intends to review and analyze PPL's proposed Phase II Plan as it pertains to program design. The variety and type of programs and measures offered in PPL's Phase II Plan will directly impact Petitioner's members' ability to participate in Act 129 and benefit from investing in energy efficiency measures.

11. Petitioner reserves the right to raise other issues as necessary and appropriate during the course of the proceeding and to respond to issues raised by other parties.

12. Pursuant to the Prehearing Conference Order entered in this matter and limiting each party to one entry on the service list, all documents and correspondence in this proceeding should be addressed to:

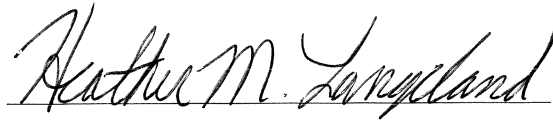
Heather Langeland, Staff Attorney
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langeland@pennfuture.org

For the foregoing reasons, Petitioner requests that the Commission grant this Petition and confer status as Intervenor in this Proceeding.

CONCLUSION

Wherefore, PennFuture respectfully requests that the Commission grant this Petition to Intervene, provide PennFuture with full-party status in this proceeding, and allow such other relief as it deems necessary.

Respectfully submitted,

A handwritten signature in cursive script that reads "Heather M. Langeland". The signature is written in black ink and is positioned above a horizontal line.

Heather M. Langeland, Staff Attorney
Pa. Bar Id. No. 207387

200 First Ave., Suite 200

Pittsburgh, PA 15222
Phone: 412-258-6684
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langeland@pennfuture.org


Counsel for Petitioner PennFuture

DATED: December 6, 2012

VERIFICATION

I, Courtney Lane, am a Senior Energy Policy Analyst for Citizens for Pennsylvania's Future's Center for Energy, Enterprise and the Environment. I hereby state facts set forth herein are true and correct to the best of my knowledge, information and belief and that I expect to be able to prove the same at a hearing held in this matter. I have registered to use the Public Utility Commission's electronic filing system in accordance with the registration instructions available on the Commission's web site and have obtained a user ID and password. I understand that the statements made herein are subject to the penalties of 18 Pa.C.S. Section 4904 concerning unsworn falsification to authorities.

DATED: December 6, 2012



Courtney Lane, Senior Energy Policy Analyst
PennFuture

CERTIFICATE OF SERVICE

Petition of PPL Electric Utilities Corporation :
for Approval of its Act 129 Phase II : M-2012-2334388
Energy Efficiency and Conservation Plan :

I, Heather M. Langeland, do hereby certify that a true and accurate copy of the foregoing PETITION TO INTERVENE OF CITIZENS FOR PENNSYLVANIA'S FUTURE was served upon the following this 6th day of December, 2012, by depositing a copy of the same in the United States mail, postage prepaid and addressed to:

PAUL E RUSSELL ESQUIRE
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HARRISBURG, PA 17101

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Heather M. Langeland

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