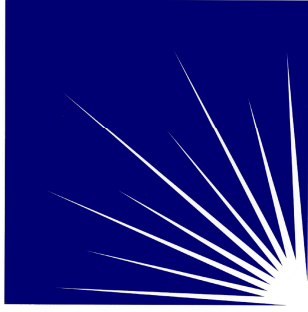


Clean Air Council



May 13, 2015

By eFiling

Rosemary Chiavetta
Secretary
Pennsylvania Public Utility Commission
P.O. Box 3265
Harrisburg, PA 17105-3265

Re: Pennsylvania Public Utility Commission v. PPL Electric Utilities Corporation, Docket No. R-2015-2469275.

Dear Secretary Chiavetta:

Enclosed please find both the **Amended Petition to Intervene** of Clean Air Council and **Notice of Appearance** for Benjamin Z. Hartung in the above captioned matter. The attached petition and notice of appearance have been eFiled and served electronically upon all parties on the Service List.

Sincerely,

Joseph Otis Minott, Esquire

Ernest Logan Welde, Esquire

Attorneys for Clean Air Council

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission	:	
	:	Docket No. R-2015-2469275
	:	
v.	:	
	:	
	:	
PPL Electric Utilities Corporation	:	
	:	

CLEAN AIR COUNCIL'S AMENDED PETITION TO INTERVENE

Pursuant to 52 Pa. Code §§ 5.72-5.75 Clean Air Council (“CAC”) hereby files this **Amended (in bold) Petition to Intervene in response to Administrative Law Judge Susan D. Colwell’s Scheduling Order dated May 7, 2015** in the above captioned proceeding. **Judge Colwell directed Clean Air Council to amend its original Petition to Intervene to include, by name, our members who are PPL Electric customers.**¹ In support thereof, CAC states as follows:

1. CAC is a member-supported environmental organization serving Pennsylvania and the Mid-Atlantic Region. CAC is dedicated to protecting and defending everyone’s right to breathe clean air. CAC works through a broad array of related sustainability and public health initiatives, using public education, community action, government oversight, and enforcement of environmental laws. CAC has 483 members, supporters and activists in PPL’s service territory. **CAC’s members that are PPL customers include, but are not limited to:**

- Evan C. Pappas, 240 Edward Street Harrisburg, PA 17110

¹ Administrative Law Judge Susan D. Colwell’s Scheduling Order, May 7, 2015.

- Brooks Mountcastle, 909 Penn Street Harrisburg, PA 17102
- Maureen Mulligan, 33 Greening Life Lane, Shermans Dale, PA 17090
- John Lee, 1301 Mickley Road, Whitehall, PA 18052

2. CAC's attorneys in this matter are:

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Clean Air Council

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135 S. 19th Street
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Philadelphia, Pennsylvania 19103
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Facsimile: (215) 567-5791

3. On March 31, 2015, PPL Electric Utilities Corporation ("PPL") submitted a rate filing, Supplement No. 179 to PPL Electric's Tariff-Electric PA P.U.C. No. 201, in which PPL proposes to increase its retail distribution rates by approximately \$167.5 million. This would result in an average increase of approximately 18.5% in distribution rates.

4. The Commission's regulations allow intervention where a person has an interest in the proceeding which may be directly affected and which is not adequately represented by existing parties, and, as to which the person may be bound by the action of the Commission in the proceeding. 52 Pa. Code § 5.72(a)(2). Intervention is also permitted where participation of the person may be in the public interest. 52 Pa. Code § 5.72(a)(3). A "person" includes a corporation and an association. 52 Pa. Code § 1.8.

5. CAC meets the standards for intervention set forth in 52 Pa. Code § 5.72(a). CAC is committed to improving air quality throughout Pennsylvania; reducing the impact of air pollution on the health of vulnerable populations; and ensuring that renewable energy and energy efficiency be expanded and utilized to the fullest extent possible. The Commission's actions in this proceeding regarding PPL's proposed rate increase will have a direct impact on the ability of CAC to achieve these goals. **If the fixed rates apportioned to PPL customers are raised, then the adoption and installation of energy efficiency and renewable energy will diminish due in part to a longer payback period for PPL customers, including our members. The diminution of adoption and installation of energy efficiency and renewable energy for PPL customers, including our members, will cause the continuation of energy use created by the burning of fossil fuel.² The continuation of the burning of fossil fuel, and not adopting or installing more energy efficiency or renewable energy will exacerbate the air quality for PPL customers, including our members, and all those who enjoy the right to breathe clean air.**

6. CAC's interests in this proceeding are unique from, and not adequately represented by, other parties that may seek to intervene because CAC is a well-established local environmental organization which has extensive experience in air quality issues, renewable energy and energy efficiency.

7. CAC's intervention is in the public interest because it will enable CAC to contribute its unique perspective and insight of a well-established local environmental organization as the Commission considers PPL's proposals. CAC has intervened in previous matters before the

² Over 97% of PPL's energy resources came from non-renewable energy sources from June 1, 2013 to May 31, 2014. *Environmental Disclosure for the Electricity Products of PPL EnergyPlus, LLC* (Available at <https://www.pplenergyplus.com/~media/epweb/files/large%20business/emissions%20and%20fuel%20mix%20disclosures/njppenergypluslcnjlabel2014.pdf?la=en>).

Pennsylvania Public Utility Commission, New Jersey Board of Public Utilities and Delaware Public Service Commission.

8. Due to the early stage of this proceeding, CAC reserves the right to raise and address issues identified through its continued review and analysis of PPL's rate increase proposal or other issues raised by other parties.

WHEREFORE, Clean Air Council respectfully requests that the Commission grant this Petition to Intervene.

Respectfully submitted,



Joseph Otis Minott, Esquire



Ernest Logan Welde, Esquire

Date: May 13, 2015

Attorneys for Clean Air Council

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission	:	
	:	
v.	:	R-2015-2469275
	:	
PPL Electric Utilities Corporation	:	

NOTICE OF APPEARANCE

Please enter the appearance of the Clean Air Council in the above-captioned proceeding. A copy of all correspondence and notice, documents, orders or other communications with respect to the above-captioned proceeding should be addressed to the following:

Benjamin Hartung, Esq.
PA ID 318685
Clean Air Council
135 S. 19th Street
Philadelphia, PA 19103

The Clean Air Council number is (215)-567-4004. Benjamin Hartung can be reached by electronic mail at bhartung@cleanair.org.



Ernest Logan Welde, Esquire

VERIFICATION

I, Ernest Logan Welde, staff attorney, Clean Air Council, hereby verify that the facts contained in the foregoing pleading are true and accurate to the best of my knowledge and that I am duly authorized to make this verification, and that I expect to be able to prove the same at any hearing held in this matter.

A handwritten signature in cursive script that reads "Ernest Logan Welde".

Ernest Logan Welde, Esquire

CERTIFICATE OF SERVICE

I hereby certify that this day I served a copy of Clean Air Council's Petition to Intervene upon the persons listed below in the manner indicated in accordance with the requirements of 52 Pa. Code § 1.54.

Via Email and/or First Class Mail

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Logan Welde -

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