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December 21, 2015

VIA HAND DELIVERY

Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street, 2<sup>nd</sup> Floor (filing room)  
Harrisburg, PA 17105-3265

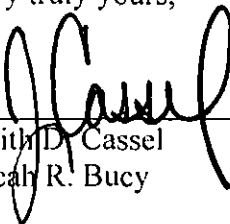
RE: Petition of PPL Electric Utilities Corporation for Approval of its Act 129 Phase III Energy Efficiency and Conservation Plan; Docket No. M-2015-2515642;  
**PETITION TO INTERVENE OF THE SUSTAINABLE ENERGY FUND OF CENTRAL EASTERN PENNSYLVANIA AND NOTICE OF APPEARANCE**

Dear Secretary Chiavetta:

Enclosed for filing with the Commission is an original Petition to Intervene of the Sustainable Energy Fund of Central Eastern Pennsylvania, and a notice of appearance for Micah R. Bucy. These filings have been served in accordance with the attached Certificate of Service.

If you have any questions concerning this filing, please do not hesitate to contact my office.

Very truly yours,

  
\_\_\_\_\_  
Judith D. Cassel  
Micah R. Bucy

*Counsel for The Sustainable Energy Fund of  
Central Eastern Pennsylvania*

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PA PUC  
BUREAU

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Enclosures

cc: Administrative Law Judge Susan D. Colwell  
Per Certificate of Service

MAILING ADDRESS: P.O. BOX 1778 HARRISBURG, PA 17105

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

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Petition of PPL Electric Utilities :  
Corporation for Approval of its Act 129 :  
Phase III Energy Efficiency and :  
Conservation Plan :

Docket No.: M-2015-2515642

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**PETITION TO INTERVENE  
OF THE SUSTAINABLE ENERGY FUND  
OF CENTRAL EASTERN PENNSYLVANIA**

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The Sustainable Energy Fund of Central Eastern Pennsylvania ("SEF"), by and through its attorneys, Hawke McKeon & Sniscak, LLP, files this Petition to Intervene in the above-captioned proceeding pursuant to 52 Pa. Code § 5.71, *et seq.* In support of its intervention, SEF states as follows:

**I. BACKGROUND**

1. This proceeding involves PPL Electric Utilities Corporation's ("PPL") November 30, 2015 filing of the Petition of PPL Electric Utilities Corporation for Approval of its Act 129 Phase III Energy Efficiency and Conservation Plan ("Phase III EE&C Plan"). The Phase III EE&C Plan was filed pursuant to the Public Utility Commission's ("Commission") June 19, 2015 Implementation Order<sup>1</sup> in which the Commission established the Phase III Energy Efficiency and Conservation Program, including the tentative adoption of specific consumption reduction targets for each subject Electric Distribution Company ("EDC"), including PPL.<sup>2</sup>

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<sup>1</sup> Energy Efficiency and Conservation Program Implementation Order, Docket No. M-2014-2424864 (entered June 19, 2015) ("Implementation Order").

<sup>2</sup> These reduction targets become final for any covered EDC that did not petition the Commission for an evidentiary hearing by July 6, 2015. Implementation Order at 150. PPL did not file for an evidentiary hearing for Phase III.

2. SEF is a Pennsylvania corporation established upon the conclusion of PPL's Restructuring Proceeding and pursuant to the terms of the Joint Settlement of that proceeding approved by the Commission's August 27, 1998 Order at Docket No. R-00973954. SEF's mission is to promote and invest in energy efficiency, renewable energy and energy education that provide opportunities and benefits for PPL ratepayers, including low-income ratepayers.

3. SEF's address is as follows:

The Sustainable Energy Fund of Central Eastern Pennsylvania  
1005 Brookside Road, Suite 210  
Allentown, PA 18106

4. The name, address, and telephone number of SEF's attorney is:

Judith D. Cassel  
Micah R. Bucy  
Hawke McKeon & Sniscak LLP  
100 North Tenth Street  
Harrisburg, PA 17105-1778  
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## II. SEF's INTEREST IN THIS PROCEEDING

5. As noted above, SEF's mission is to promote and invest in energy efficiency, renewable energy and energy education that provides opportunities and benefits for PPL ratepayers. In furtherance of its mission, SEF is engaged in projects that emphasize renewable energy sources, such as solar and wind power development, clean energy technologies, energy conservation and efficiency, as well as energy education.

6. SEF's mission, in large part, is focused on reductions in consumption and demand for electricity within the PPL service territory and for purposes of this proceeding that mission coincides with the goals of Act 129.

7. Accordingly, SEF's intervention is necessary to ensure the development of a complete record on the reasonableness of PPL's Phase III EE&C Plan proposals. SEF has a unique perspective in keeping with its mission to promote and invest in energy efficiencies, renewable energy and energy education that provide opportunities and benefits for PPL ratepayers, which cannot be adequately represented by any other party to this proceeding, which is in the public interest and which should be considered by the Commission.

8. SEF has intervened and participated as a party in both Phase I and II of Act 129. SEF has filed Comments in the Phase I proceedings at Docket No. M-2008-2069887, in the Phase II proceedings at Docket No. M-2012-2289411, and has filed comments in the Phase III proceedings at Docket No. M-2014-2424864. Moreover, SEF has been an active participant in PPL's Phase I and II EE&C Plan filings at Docket Nos. M-2009-2093216 and M-2012-2334388, respectively, and as a participant in PPL's subsequent filings to amend its EE&C Plans. Additionally, SEF has actively participated in working groups and stakeholder meetings associated with the implementation of Act 129.

9. SEF intends to actively participate in this proceeding. Notwithstanding the filing of the instant Petition to Intervene, SEF reserves its right to file responsive pleadings and/or comments to PPL's EE&C Phase III Plan by the January 4, 2015 deadline set forth in the Prehearing Conference Order dated December 18, 2015.

*WHEREFORE, the Sustainable Energy Fund of Central Eastern Pennsylvania requests that the Pennsylvania Public Utility Commission grant its Petition to Intervene in the above-captioned proceeding and grant it full party status.*

Respectfully submitted,



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Micah R. Bucy, I.D. No. 320196  
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*Counsel for The Sustainable Energy Fund of  
Central Eastern Pennsylvania*

Dated: December 21, 2015

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**CERTIFICATE OF SERVICE**

I hereby certify that I have this day served a true copy of the foregoing document(s) via First-Class Mail (unless noted otherwise) upon the parties, listed below, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a party).

The Honorable Susan D. Colwell  
Administrative Law Judge  
PA Public Utility Commission  
P.O. Box 3265  
Harrisburg, PA 17105  
[scolwell@pa.gov](mailto:scolwell@pa.gov)  
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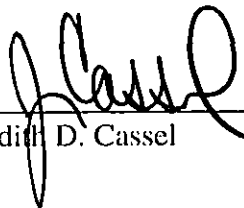
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Judith D. Cassel

Dated: December 21, 2015

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