

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission	:	
	:	
v.	:	R-2016-2580030
	:	
UGI Penn Natural Gas, Inc.	:	

**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 UGI Penn Natural Gas, Inc.'s request for a rate increase filed with the Commission.
4. UGI Penn Natural Gas, Inc. serves customers in numerous counties including Luzerne County.

5. CEO seeks permission to intervene in UGI Penn Natural Gas, Inc.'s request for a rate increase not only to address the proposed increase but to ensure the adequacy of the Company's programs for its low income customers and the effect of any proposed increase on those programs and customers.

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 utility rates remain affordable for its clients and to ensure that its low income programs remain adequately funded and available. 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 set forth its position on the proposed rate increase. CEO's main purpose is to address the adequacy of the Company's low-income programs and the effect of any proposed rate increase on those programs.

9. There is a substantial public interest in keeping utility costs affordable for all members of the community and any increase in rates should be accompanied by an increase in funding available to the Company's low-income programs so that its rates remain just and reasonable across all customer classes.

10. CEO expects to address the any proposed change in rate structure that would impact upon the motive and ability of low income customers to reduce their monthly bills through conservation.

11. CEO has been an active participant in this Company's prior requests for rate increases.

**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.

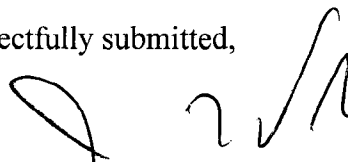
3. Order that the following be designated as CEO's recipients for service:

Joseph L. Vullo, Esquire  
1460 Wyoming Avenue  
Forty Fort, PA 18704  
Phone: (570) 288-0700  
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,

A handwritten signature in black ink, appearing to read 'J. Vullo', is written above a horizontal line.

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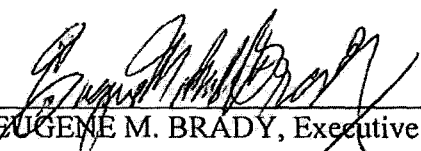
JOSEPH L. VULLO, ESQUIRE  
Burke Vullo Reilly Roberts  
1460 Wyoming Avenue  
Forty Fort, PA 18704  
(570) 288-6441  
e-mail: [jlvullo@aol.com](mailto:jlvullo@aol.com)

**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: \_\_\_\_\_

2/13/17

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**CERTIFICATE OF SERVICE**

The undersigned certified that he served a copy of the foregoing Petition to Intervene upon the following participants as indicated on this 13th day of February, 2017:

Kent D. Murphy, Esquire  
Danielle Jouenne, Esquire  
Mark C. Morrow, Esquire  
UGI Corporation  
460 North Gulph Road  
King of Prussia, PA 19406  
**via e-Service**

David B. MacGregor, Esquire  
Christopher T. Wright, Esquire  
Post & Schell, P.C.  
17 North Second Street  
12<sup>th</sup> Floor  
Harrisburg, PA 17101-1601  
**via e-Service**

Harrison W. Breitman, Esquire  
Candis A. Tunillo, Esquire  
David T. Evrard, Esquire  
Office of Consumer Advocate  
555 Walnut Street  
Forum Place – 5<sup>th</sup> Floor  
Harrisburg, PA 17101-1923  
**via e-Service**

Pamela C. Polacek, Esquire  
McNees, Wallace & Nurick  
100 Pine Street  
P.O. Box 1166  
Harrisburg, PA 17108  
**via e-Service**

Elizabeth R. Marx, Esquire  
Patrick Cicerio, Esquire  
Joline Price, Esquire  
PA Utility Law Project  
118 Locust Street  
Harrisburg, PA 17101  
**via e-Service**

Phillip C. Kirchner, Esquire  
Scott B. Granger, Esquire  
PA Public Utility Commission  
Bureau of Investigation & Enforcement  
400 North Street  
2<sup>nd</sup> Floor West  
Harrisburg, PA 17120  
**via e-Service**

Retail Energy Supply Association  
7159 Red Top Road  
Hummelstown, PA 17036  
**via First Class Mail**

The Proctor & Gamble Paper Products Co.  
P.O. Box 599  
Cincinnati, OH 45201  
**via First Class Mail**

John Evans  
Office of Small Business Advocate  
300 North Second Street  
Suite 202  
Harrisburg, PA 17101  
**via First Class Mail**



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Attorney for Commission on Economic  
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