



Via E-File

April 10, 2020

Secretary Rosemary Chiavetta
Pennsylvania Public Utility Commission
Commonwealth Keystone Building, Second Floor
400 North Street
Harrisburg, PA 17120

Re: Petition of PECO Energy Company for Approval of a Default Service Program for the
Period of June 1, 2021 through May 31, 2025, Docket No. P-2020-3019290

Dear Secretary Chiavetta,

Attached for filing, please find a Petition to Intervene of the Tenant Union Representative Network (TURN) and Action Alliance of Senior Citizens of Greater Philadelphia (Action Alliance) in the above referenced matter. Copies of this petition are being served pursuant to the attached Certificate of Service.

Respectfully submitted,

Robert W. Ballenger
Counsel for TURN and Action Alliance

cc Service List

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of PECO Energy Company for Approval : Docket No. P-2020-3019290
of a Default Service Program for the Period of :
June 1, 2021 through May 31, 2025 :

**Petition to Intervene of Tenant Union Representative Network and
Action Alliance of Senior Citizens of Greater Philadelphia**

The Tenant Union Representative Network (“TURN”) and Action Alliance of Senior Citizens of Greater Philadelphia (collectively “TURN et al.”), through counsel Community Legal Services, Inc., hereby file this Petition to Intervene in the above-captioned proceeding, pursuant to the provisions of the Rules of Practice and Procedure of the Pennsylvania Public Utility Commission (“PUC” or “Commission”), 52 Pa. Code §§5.71-5.76, and in support, state as follows:

1. On March 13, 2020, PECO Energy Company (“PECO” or “the Company”) filed the Petition of PECO Energy Company for Approval of a Default Service Program for the Period of June 1, 2021 through May 31, 2025 (“DSP V”), which was assigned this Docket No. P-2020-3019290.
2. The Rules of Practice and Procedure of the PUC provide, at 52 Pa. Code §5.74(b)(2), that petitions to intervene shall be filed no later than the date fixed for filing protests as published in the Pennsylvania Bulletin except for good cause shown. A fixed date for filing protests has not yet been published in the Pennsylvania Bulletin.¹

¹ A Secretarial Letter entered on the docket, but not yet published, establishes May 1, 2020 as the deadline for Petitions to Intervene.

3. Intervenor Tenant Union Representative Network (“TURN”) is a not-for-profit advocacy organization composed of moderate and low income tenants, all either customers of or dependent on electricity service from PECO Energy. In those capacities, they have a direct, immediate, substantial and distinct interest in the impact of the currently proposed Default Service Plan (“DSP V”), and the manner in which PECO proposes to implement CAP Shopping in connection therewith. TURN is located at 100 South Broad Street, Suite 800, Philadelphia, PA 19110.
4. Intervenor Action Alliance of Senior Citizens of Greater Philadelphia (“Action Alliance”) is a not-for-profit membership organization of senior citizens, many of whom are customers of PECO Energy, on whom they rely for their electricity and gas needs, including cooling and heating. In those capacities, they have a direct, immediate, substantial and distinct interest in the impact of the DSP V, and the manner in which PECO proposes to implement CAP Shopping in connection therewith. Action Alliance is located at 2000 S. 58th Street, Apt. 602, Philadelphia, PA 19143.
5. The intervenors were parties in prior Commission proceedings involving PECO Energy, including, but not limited to, the following:
 - a. Petition of PECO Energy Company for Approval of its Default Service Plan (DSP IV), Docket No. P-2016-2534980;
 - b. In the Matter of PECO Energy Company Universal Service and Energy Conservation Plan for 2016-2018 Submitted in Compliance with 52 Pa. Code §§54.74 and 62.4, Docket No. M-2015-2507139;

- a. Petition of PECO Energy Company for Approval of its Default Service Plan (DSP II), Docket No. P-2012-2283641, including appeal to Commonwealth Court and Petition for Allocatur to the Supreme Court of Pennsylvania;
 - b. In the Matter of PECO Energy Company Universal Services Three-Year Plan 2013-2015 Submitted in Compliance with 52 Pa. Code §54.74, Docket No. M-2012-2290911;
 - c. Petition of PECO Energy for Approval of Its Act 129 Energy Efficiency and Conservation Plan and Expedited Approval of Its Compact Fluorescent Lamp Program, Docket No. M-2009-2093215;
 - d. Petition of PECO Energy Company for Approval of its Default Service Program and Rate Mitigation Plan, Docket No. P-2008-2062739;
 - e. Petition of PECO Energy Company for Approval of its Market Rate Transition Energy Efficiency Package, Docket No. P-2008-2062740;
 - f. Petition of PECO Energy Company for Approval of its Market Rate Transition Phase-In Program, Docket No. P-2008-2062741; and
 - g. In the Matter of PECO Energy Company Universal Services Three-Year Plan 2007-2009 Submitted in Compliance with 52 Pa. Code §54.74, Docket No. M-00061945.
6. The intervenors have continuing interests in the impact of the PECO Default Service Program on moderate and low income residential customers, who are tenants and/or senior citizens, and the manner in which PECO proposes to implement CAP Shopping in its DSP V petition. These interests are not adequately represented by other participants.
 7. Intervenors TURN and Action Alliance are represented by:

Robert W. Ballenger, Esquire
Josie B. H. Pickens, Esquire
Joline R. Price, Esquire
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8. Counsel for TURN and Action Alliance consent to the service of documents by electronic mail to the email addresses of counsel listed above, as provided in 52 Pa. Code §1.54(b)(3).

WHEREFORE, TURN and Action Alliance respectfully request that the Public Utility Commission enter an order granting TURN and Action Alliance full status as an intervener in this proceeding with active party status and grant such other relief as is just and appropriate.

/s/

Robert W. Ballenger, Esquire (Attorney ID: 93434)
Josie B. H. Pickens, Esquire (Attorney ID: 309422)
Joline R. Price, Esquire (Attorney ID: 315405)
Counsel for TURN and Action Alliance
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1424 Chestnut Street
Philadelphia, PA 19102
(215) 981-3700

April 10, 2020

VERIFICATION

I, Phil Lord, on behalf of Tenant Union Representative Network (TURN), hereby state that the facts contained in the foregoing pleading are true and correct to the best of my knowledge, information and belief, that I am duly authorized to make this Verification, and that I expect to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa. C.S. §4904 (relating to unsworn falsification to authorities).

Date: April 10, 2020

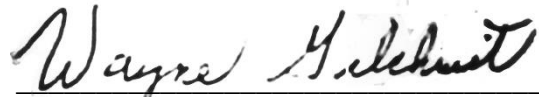
A handwritten signature in black ink that reads "Phil Lord". The signature is written in a cursive style with a large initial "P" and "L".

Executive Director, TURN

VERIFICATION

I, Wayne Gilchrist, on behalf of Action Alliance of Senior Citizens of Greater Philadelphia (Action Alliance), hereby state that the facts contained in the foregoing pleading are true and correct to the best of my knowledge, information and belief, that I am duly authorized to make this Verification, and that I expect to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa. C.S. §4904 (relating to unsworn falsification to authorities).

Date: April 10, 2020

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

Chair, Action Alliance

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PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of PECO Energy Company for Approval : Docket No. P-2020-3019290
of a Default Service Program for the Period of :
June 1, 2021 through May 31, 2025 :

I hereby certify that I have this day served copies of the Petition to Intervene of Tenant Union Representative Network and Action Alliance of Senior Citizens of Greater Philadelphia, as set forth below in accordance with the requirements of 52 Pa. Code §1.54:

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April 10, 2020

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