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December 18, 2020

VIA ELECTRONIC FILING

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

Re: Petition of PPL Electric Utilities Corporation for Approval of Its Act 129 Phase IV Energy Efficiency and Conservative Plan; Docket No. M-2020-3020824;
PETITION TO INTERVENE OF SUSTAINABLE ENERGY FUND OF CENTRAL EASTERN PENNSYLVANIA

Dear Secretary Chiavetta:

Enclosed for electronic filing with the Commission is the Petition to Intervene of Sustainable Energy Fund of Central Eastern Pennsylvania's ("SEF") in the above-referenced matter. Copies of the Petition have been served in accordance with the attached Certificate of Service.

If you should have any questions regarding this filing, please do not hesitate to contact our office.

Best regards,

/s/ Judith D. Cassel

Judith D. Cassel
Micah R. Bucy
*Counsel for The Sustainable Energy Fund of
Central Eastern Pennsylvania*

MRB/jld
Enclosure
cc: Per Certificate of Service

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of PPL Electric Utilities :
Corporation for Approval of Its Act 129 :
Phase IV Energy Efficiency and : Docket No. M-2020-3020824
Conservation Plan :

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

NOW COMES, Sustainable Energy Fund of Central Eastern Pennsylvania (“SEF”), by and through its attorneys, Hawke McKeon & Sniscak LLP, and files this Petition to Intervene in the above-captioned proceeding before the Pennsylvania Public Utility Commission (“Commission”). In support of its Petition, SEF avers as follows:

1. On November 30, 2020, PPL Electric Utilities Corporation (“PPL Electric”), filed a Petition for Approval of its Act 129 Phase IV Energy Efficiency and Conservation Plan (“EE&C”) pursuant to Act 129, the Implementation Order entered by the Pennsylvania Public Utility Commission on June 18, 2020.¹

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

¹ *Energy Efficiency and Conservation Program*, Docket No. M-2020-3015228 (Implementation Order Entered June 18, 2020) (“*Implementation Order*”).

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:

Sustainable Energy Fund
4250 Independence Dr Ste 100
Schnecksville, PA 18078

4. The name, address, and telephone number of SEF's attorneys are:

Judith D. Cassel, Attorney ID No. 209393
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5. All correspondence and pleadings in this docket should be directed to SEF's counsel in this matter.

6. Eligibility to intervene in Commission proceedings is governed by the Commission's regulations found at 52 Pa. Code § 5.72. The Commission's regulations provide that in order to have the ability to intervene, a party must have "a right or interest" sufficient to warrant intervention, which includes an interest that may be directly affected by the proceeding and which is not being adequately represented by existing participants, and where the petitioner may be bound by the actions of the Commission or where the right or interest is otherwise in the public interest. *Id.*

7. 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.

8. 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.

10. SEF has intervened and participated as a party in Phases I, II and III of Act 129. SEF has been an active and important participant in all phases of PPL's EE&C Plan filings at Docket Nos. M-2009-2093216, M-2012-2334388 and M-2015-2515642, respectively, and as a participant in PPL's subsequent filings to amend its EE&C Plans.

11. 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 IV Plan.

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,

/s/ Judith D. Cassel

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*Counsel for Sustainable Energy Fund of Central
Eastern Pennsylvania*

Dated: December 18, 2020

VERIFICATION

I, John Costlow, certify that I am the President of Sustainable Energy Fund, and that in this capacity I am authorized to, and do make this Verification on its behalf, that the facts set forth in the foregoing document are true and correct to the best of my knowledge, information and belief. I understand that false statements made therein are made subject to the penalties of 18 Pa. C.S. §4904, relating to unsworn falsifications to authorities.



John Costlow
President, SEF

Dated: 12/18/2020

CERTIFICATE OF SERVICE

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

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/s/ Judith D. Cassel

Judith D. Cassel

Dated this 18th of December, 2020.