



COMMONWEALTH OF PENNSYLVANIA

December 21, 2020

E-FILED

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

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

Dear Secretary Chiavetta:

Enclosed please find the Notice of Intervention, Public Statement, and Verification, on behalf of the Office of Small Business Advocate (“OSBA”), in the above-captioned proceeding.

Copies will be served on all known parties in this proceeding, as indicated on the attached Certificate of Service.

If you have any questions, please do not hesitate to contact me.

Sincerely,

/s/ Steven C. Gray

Steven C. Gray
Senior Supervising
Assistant Small Business Advocate
Attorney I.D. No. 77538

Enclosures

cc: Robert D. Knecht
Parties of Record

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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

**NOTICE OF INTERVENTION
OF THE OFFICE OF SMALL BUSINESS ADVOCATE**

The Office of Small Business Advocate (“OSBA”) files this Notice of Intervention with respect to the Petition for Approval of its Act 129 Phase IV Energy Efficiency and Conservation Plan (“*Petition*”) that was filed with the Pennsylvania Public Utility Commission (“Commission”) on November 30, 2020, by PPL Electric Utilities Corporation (“PPL” or the “Company”). In support of this Intervention, the OSBA avers, as follows:

1. The OSBA is an agency of the Commonwealth of Pennsylvania authorized by the Small Business Advocate Act (Act 181 of 1988, 73 P.S. §§ 399.41 – 399.50) to represent the interests of small business customers as a party in proceedings before the Commission.
2. Intervention in this case is necessary to ensure that the interests of small business customers served by PPL are adequately represented.

3. Representing the OSBA in this proceeding is:

Steven C. Gray, Esquire
Office of Small Business Advocate
555 Walnut Street
Forum Place, 1st Floor
Harrisburg, PA 17101
(717) 783-2525
(717) 783-2831 (fax)
sgray@pa.gov

Respectfully Submitted,

/s/ Steven C. Gray
Steven C. Gray
Senior Supervising
Assistant Small Business Advocate
Attorney I.D. No. 77538

For:
John R. Evans
Small Business Advocate

Office of Small Business Advocate
555 Walnut Street, 1st Floor
Harrisburg, PA 17101
(717) 783-2525

Dated: December 21, 2020

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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

**PUBLIC STATEMENT OF THE
OFFICE OF SMALL BUSINESS ADVOCATE**

The Small Business Advocate is authorized and directed to represent the interest of small business consumers of utility services in Pennsylvania under the provisions of the Small Business Advocate Act, Act 181 of 1988, 73 P.S. §§ 399.41 - 399.50 ("Act"). The Act further provides that the Small Business Advocate is to issue publicly a written statement stating concisely the specific interest of small business consumers to be protected by his initiation of or intervention in any proceeding involving those interests before the Public Utility Commission ("PUC" or the "Commission") or any other agency or court. This public statement addresses the filing today by the Small Business Advocate of an intervention in the Petition for Approval of its Act 129 Phase IV Energy Efficiency and Conservation Plan ("Petition") that was filed with the Pennsylvania Public Utility Commission ("Commission") on November 30, 2020, by PPL Electric Utilities Corporation ("PPL" or the "Company").

The Small Business Advocate has intervened in this case to ensure that the interests of small business customers served by PPL are adequately represented. A thorough inquiry by the Commission into all of the elements of the Petition is necessary to ascertain whether PPL's proposal for a Phase IV EE&C Plan is in accordance with the Public Utility Code and with the Commission's regulations.


In view of the foregoing, the Small Business Advocate will participate in proceedings before the Commission to investigate whether the Petition is just, reasonable, and non-discriminatory.

Dated: December 21, 2020

VERIFICATION

I, John R. Evans, hereby state that the facts set forth herein above are true and correct to the best of my knowledge, information and belief 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: 12/21/2020


(Signature)

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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

:
: **Docket No. M-2020-3020824**
:
:

CERTIFICATE OF SERVICE

I hereby certify that true and correct copies of the foregoing have been served via email (*unless otherwise noted below*) upon the following persons, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

Joseph L. Vullo, Esquire
Burke Vullo Reilly Roberts
1460 Wyoming Avenue
Forty Fort, PA 18704
jlvullo@bvrrlaw.com

Devin T. Ryan
Post & Schell, P.C.
17 North Second Street, 12th Floor
Harrisburg, PA 17101-1601
dryan@postschell.com

Judith D. Cassel, Esquire
Micah R. Bucy, Esquire
Hawke McKeon & Sniscak LLP
Harrisburg Energy Center
100 North Tenth Street
Harrisburg, PA 17101
jdcassel@hmslegal.com
mrbcy@hmslegal.com

Deanne M. O'Dell, Esq.
Daniel Clearfield, Esq.
Sarah C. Stoner, Esq.
Eckert Seamans Cherin & Mellott, LLC
213 Market Street, 8th Floor
Harrisburg, PA 17101
dodell@eckertseamans.com
dclearfield@eckertseamans.com
sstoner@eckertseamans.com

Richard A. Kanaskie, Esq.
Bureau of Investigation & Enforcement
PA Public Utility Commission
PO Box 3265
400 North St., 2nd Floor West
Harrisburg, PA 17105-3265
rkanaskie@pa.gov

Derrick P Williamson Esquire
Barry A Naum Esquire
Spilman Thomas & Battle PLLC
1100 Bent Creek Blvd Suite 101
Mechanicsburg PA 17050
dwilliamson@spilmanlaw.com bnaum@spilmanlaw.com

Pamela Polacek, Esq.
Adeolu A. Bakare, Esquire
McNees, Wallace & Nurick LLC
100 Pine Street
P.O. Box 1166
Harrisburg, PA 17108-1166
abakare@mwn.com
ppolacek@mwn.com

John Sweet, Esq.
Ria Pereira, Esq.
Pennsylvania Utility Law Project
118 Locust St.
Harrisburg, PA 17101
pulp@palegalaid.net

Kimberly A. Klock, Esq.
Michael J. Shafer, Esq.
PPL Service Corporation
Two North Ninth St.
Allentown, PA 18101
kklock@pplweb.com
mjshafer@pplweb.com

David B. MacGregor
Post & Schell, P.C
Four Penn Center
1600 John F. Kennedy
Boulevard
Philadelphia, PA 19103-2808
dmacgregor@postschell.com

The Honorable Charles E. Rainey Jr.
Chief Administrative Law Judge
Pennsylvania Public Utility Commission
400 North Street
Commonwealth Keystone Building
Harrisburg, PA 17120
crainey@pa.gov

DATE: December 21, 2020

/s/ Steven C. Gray

Steven C. Gray
Senior Supervising
Assistant Small Business Advocate
Attorney I.D. No. 77538