



September 2, 2020

VIA eFILING

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor
Harrisburg, PA 17120

**Re: Petition of Philadelphia Gas Works for Approval of Demand-Side Management
Plan for FY 2021-2023**

**Philadelphia Gas Works Universal Service and Energy Conservation Plan for 2014-
2016 52 Pa Code § 62.4 — Request for Waivers**

Dear Secretary Chiavetta:

Enclosed please find the Certificate of Service evidencing service upon the parties of record of the Petition to Intervene of Tenant Union Representative Network (TURN) in the above-captioned proceeding. If you have any questions, please do not hesitate to contact me.

Sincerely,

Robert W. Ballenger

Counsel for TURN

Enc.

Cc: Service list

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of Philadelphia Gas Works for	:	
Approval of Demand-Side Management	:	
Plan for FY 2021-2023	:	
	:	Docket No. P-2014-2459362
Philadelphia Gas Works Universal Service	:	
and Energy Conservation Plan for 2014-2016	:	
52 Pa Code § 62.4 — Request for Waivers	:	

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a copy of the Petition to Intervene of Tenant Union Representative Network and upon the persons listed below in the manner indicated in accordance with the requirements of 52 Pa. Code §1.54.

VIA EMAIL

The Honorable F. Joseph Brady
Administrative Law Judge
Pennsylvania Public Utility Commission
801 Market Street, Suite 4063
fbrady@pa.gov
pmcneal@pa.gov

Daniel Clearfield, Esq.
Deanne M. O’Dell, Esq.
Eckert Seamans Cherin & Mellott, LLC
213 Market Street, 8th Fl.
Harrisburg, PA 17101
dclearfield@eckertseamans.com
dodell@eckertseamans.com

Christy M. Appleby, Esq.
Laura J. Antinucci, Esq.
Darryl A. Lawrence, Esq.
Office of Consumer Advocate
555 Walnut St, 5th Fl
Harrisburg, PA 17101-1923
cappleby@paoca.org
dlawrence@paoca.org
lantinucci@paoca.org

Carrie B. Wright, Esquire
Gina L. Miller, Esquire
Bureau of Investigation & Enforcement
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Fl.
Harrisburg, PA 17101
cawright@pa.gov
ginmiller@pa.gov

Sharon Webb
Office of Small Business Advocate
555 Walnut St, 1st Fl
Harrisburg, PA 17101
swebb@pa.gov

Charis Mincavage, Esq.
McNees Wallace & Nurick LLC
100 Pine Street
P.O. Box 1166
Harrisburg, Pennsylvania 17108
cmincavage@mcneeslaw.com

Elizabeth Marx
John Sweet
Ria Pereira
Pennsylvania Utility Law Project
118 Locust Street
Harrisburg, PA 17101
pulp@palegalaid.net
Joseph Otis Minott, Esq.
Ernest Logan Welde, Esq.
Clean Air Council
135 S. 19th Street, Suite 300
Philadelphia, PA 19103
Counsel for Environmental Stakeholders
joe_minott@cleanair.org
lwelde@cleanair.org



Robert W. Ballenger, Esq. PA ID. 93434
Community Legal Services, Inc.
1424 Chestnut Street
Philadelphia, PA 19102
T: 215-981-3700
F: 267-765-6481

September 2, 2020

Counsel for TURN

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of Philadelphia Gas Works for Approval of:
Demand-Side Management Plan for FY 2021-2023 :
Philadelphia Gas Works Universal Service and : Docket No. P-2014-2459362
Energy Conservation Plan for 2014-2016 52 Pa :
Code § 62.4 — Request for Waivers :
:

PETITION TO INTERVENE OF TENANT UNION REPRESENTATIVE NETWORK

The Tenant Union Representative Network ("TURN"), 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. Petitioner’s mission is to advance and defend the rights and interests of tenants and homeless people with the goal of guaranteeing to all Philadelphians equal access to safe, decent, accessible, and affordable housing.
2. Petitioner is represented by:

Josie B. H. Pickens, Esquire (Attorney ID: 309422)
Robert W. Ballenger, Esquire (Attorney ID: 93434)
COMMUNITY LEGAL SERVICES, INC.
1424 Chestnut Street
Philadelphia, PA 19102

Telephone: 215-981-3700
Facsimile: 267-765-6481
jpickens@clsphila.org
rballenger@clsphila.org

3. The Respondent utility is:

Philadelphia Gas Works
800 West Montgomery Avenue
Philadelphia, PA 19122

4. On May 7, 2020, Philadelphia Gas Works (PGW) filed its EnergySense Demand Side Management Portfolio Implementation Plan for Fiscal Years 2021-2023 (DSM III).
5. On August 31, 2020, the Commission's Office of Administrative Law Judge issued a Telephonic Prehearing Conference Notice, scheduling a Call-In Telephonic Prehearing Conference before Administrative Law Judge (ALJ) F. Joseph Brady for September 9, 2020.
6. On September 2, 2020, the Call-In Telephonic Prehearing Conference was rescheduled for September 10, 2020.
7. TURN is a not-for-profit advocacy organization composed of moderate and low income tenants, many of whom are customers of or dependent on gas service from PGW. In those capacities, TURN's members have a direct, immediate, substantial and distinct interest in the impact of and services proposed to be provided (or curtailed) in PGW's DSM III. TURN is located at 100 South Broad Street, Suite 800, Philadelphia, PA 19110.
8. Petitioner was a party to the settlement of the base rate filing made by PGW in December 2009, which resulted in the creation of Phase I of PGW's Demand-Side Management Program at Docket Nos. P-2009-2097639 and R-2009-2139884.
9. Petitioner was an active party in PGW's DSM Phase II proceeding, at the above-captioned docket.
10. The subject matter of PGW's DSM III is critical to the low income PGW residential customers who are members of TURN and who stand to benefit from a robust suite of energy efficiency programs that can effectively reduce household consumption and ultimately increase the affordability of gas bills.

11. In addition to evaluating the overall effectiveness of PGW's DSM programming, Petitioner is particularly concerned with the availability of and obstacles to energy efficiency measures for low-income Philadelphia tenants, who may reside in multi-family dwellings where PGW has proposed to curtail offerings in the future.
12. TURN asserts that it has standing to intervene on behalf of its members, who may be bound by the action of the Commission in this proceeding and affected by PGW's DSM III, pursuant to the regulations and standards applicable to Public Utility Commission proceedings because its members are not adequately represented by any other participant in this proceeding.

WHEREFORE, TURN respectfully request that the Pennsylvania Public Utility Commission grant this Petition to Intervene providing TURN with full-party status in this proceeding.

Respectfully submitted,



Robert W. Ballenger, Esquire (Attorney ID: 93434)
Josie B. H. Pickens, Esquire (Attorney ID: 309422)
COMMUNITY LEGAL SERVICES, INC.
1424 Chestnut Street
Philadelphia, PA 19102

Telephone: 215-981-3700
Facsimile: 267-765-6481
rballenger@clsphila.org
jpickens@clsphila.org

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: September 2, 2020

A handwritten signature in black ink that reads "Phil Lord". The signature is written in a cursive, slightly slanted style.

Title: Executive Director, TURN