

BURKE VULLO REILLY ROBERTS

ATTORNEYS AT LAW

1460 Wyoming Avenue
Forty Fort, PA 18704
Phone (570) 288-6441 + Fax (570) 288-4598

*Formerly Burke & Burke
Thomas F. Burke, Sr. (1932-1972)*

www.bvrrlaw.com

JOSEPH L. VULLO
jlvullo@bvrrlaw.com

February 17, 2021

via Electronic Filing

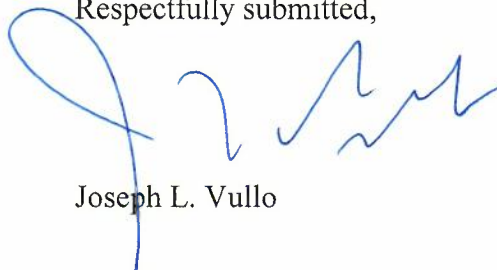
Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
400 North Street, Filing Room
Harrisburg, PA 17120

RE: UGI Utilities – Electric Division – Supplement No. 26 to UGI Electric
Tariff – Pa. PUC No. 6 and Supplement No. 2 to UGI Electric Tariff – Pa.
PUC No. 2S
Docket No. R-2021-3023618

Dear Secretary Chiavetta:

Please accept for filing the Commission on Economic Opportunity's Petition to Intervene in the above-referenced matter. A copy of this filing was served in accordance with the attached Certificate of Service.

Respectfully submitted,



Joseph L. Vullo

JLV/jar
encl.

cc: All Parties of Record

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

UGI UTILITIES, INC. – ELECTRIC DIVISION :
Supplement No. 26 to UGI Electric Tariff – : Docket No. R-2021-3023618
Pa. PUC No. 6 and Supplement No. 2 to UGI :
Electric Tariff – Pa. PUC No. 2S :

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 Utilities, Inc. – Electric Division’s request for a rate increase filed with the Commission.

4. UGI Utilities, Inc. – Electric Division serves customers in numerous counties including Luzerne County.

5. CEO seeks permission to intervene in UGI Utilities, Inc. – Electric Division’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.

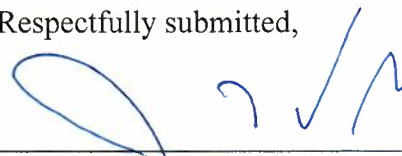
3. Order that the following be designated as CEO's recipients for service:

Joseph L. Vullo, Esquire
1460 Wyoming Avenue
Forty Fort, PA 18704
Phone: (570) 288-6441
Fax: (570) 288-4598
e-mail: jlvullo@bvrrlaw.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,



JOSEPH L. VULLO, ESQUIRE
Burke Vullo Reilly Roberts
1460 Wyoming Avenue
Forty Fort, PA 18704
(570) 288-6441
e-mail: jlvullo@bvrrlaw.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: February 16, 2021

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

UGI UTILITIES, INC. – ELECTRIC DIVISION :
Supplement No. 26 to UGI Electric Tariff – : Docket No. 2021-3023618
Pa. PUC No. 6 and Supplement No. 2 to UGI :
Electric Tariff – Pa. PUC No. 2S :

CERTIFICATE OF SERVICE

The undersigned certified that he served a copy of the foregoing Petition to Intervene upon the following participants by electronic mail on the 17th day of February 2021:

Kent Murphy, Esquire
Michael S. Swerling, Esquire
Danielle Jouenne, Esquire
UGI Corporation
460 North Gulph Road
King of Prussia, PA 19406
murphyke@ugicorp.com
swerlingm@ugicorp.com
jouenned@ugicorp.com

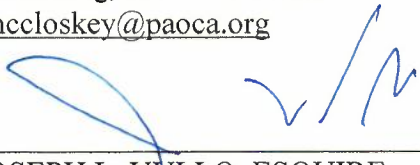
David B. MacGregor, Esquire
Post & Schell, P.C.
Four Penn Center
1600 John F. Kennedy Boulevard
Philadelphia, PA 19103-2808
dmacgregor@postschell.com

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

Johh M. Coogan, Esquire
Bureau of Investigation & Enforcement
Commonwealth Keystone Building
400 North Street, 2nd Floor West
Harrisburg, PA 17120
jcoogan@pa.gov

John R. Evans
Small Business Advocate
Office of Small Business Advocate
555 Walnut Street
Forum Place, 1st Floor
Harrisburg, PA 17101-1923
jorevan@pa.gov

Tanya J. McCloskey, Esquire
Consumer Advocate
Office of Consumer Advocate
555 Walnut Street
Forum Place, 5th Floor
Harrisburg, PA 17101-1923
tmccloskey@paoca.org



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