

# BURKE VULLO REILLY ROBERTS

ATTORNEYS AT LAW

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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](mailto:jlvullo@bvrrlaw.com)

May 4, 2021

***via Electronic Filing***

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

RE: PA Public Utility Commission v. Duquesne Light Company  
Docket No. R-2021-3024750

Dear Secretary Chiavetta:

Please accept for filing the Pennsylvania Weatherization Providers Task Force, Inc.'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**

Pennsylvania Public Utility Commission	:	
	:	
v.	:	Docket No. R-2021-3024750
	:	
Duquesne Light Company	:	

**PENNSYLVANIA WEATHERIZATION PROVIDERS TASK FORCE INC.'S  
PETITION TO INTERVENE**

NOW COMES, the Pennsylvania Weatherization Providers Task Force, Inc. by and through counsel, Joseph L. Vullo, Esquire, and petitions to intervene in the above-captioned matter, averring as follows:

1. The Petitioner, Pennsylvania Weatherization Providers Task Force, Inc. (Providers Task Force), is a Pennsylvania non-profit corporation and a statewide association of thirty-seven (37) organizations providing utility assistance and energy conservation services in each of the Commonwealth's sixty-seven counties.

2. The Providers Task Force, through its member agencies, Pennsylvania community-based organizations, administers universal service programs for a number of utility companies, including Duquesne Light. Task Force members serve low-income ratepayers, and the Providers Task Force has a direct and substantial interest in this proceeding that cannot be adequately represented by any other party.

3. The agencies listed in Exhibit A attached are members of the Providers Task Force and customers of Duquesne Light.

4. The Providers Task Force seeks permission to intervene in the Company's request for a general rate increase pursuant to the above-captioned docket number.

5. The Providers Task Force has been involved in matters before the Pennsylvania Public Utility Commission, including the submission of comments in matters concerning Act 129 and other PUC proceedings.

6. The Providers Task Force seeks permission to intervene in the Company's request for a general rate increase to examine the effect of the proposed rate increase on their customers, particularly low-income customers.

7. The Providers Task Force is also intervening to investigate whether the Company's universal service programs are appropriately funded and available and if those programs will be appropriately funded and available if the proposed rate increase is granted.

8. The Providers Task Force'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 to its clients. Accordingly, the Providers Task Force's participation will serve the public interest.

9. Because the Providers Task Force's participation represents low-income citizens in the Company's service areas, the interests of its clients are not protected by any other party to this action.

### **POSITIONS**

10. The Providers Task Force's participation takes no position at this time regarding the Company's request for rate increase but its participation in this proceeding is, in part, to study the effect of the proposed rate increase and structure on the Company's low-income customers and whether the Company's universal service programs will be appropriately funded and available.

11. There is a substantial public interest in ensuring that the Company's universal service programs are appropriately funded and available and the effect, if any, on those programs if the proposed rate increase is approved.

**REQUEST FOR RELIEF**

WHEREFORE, the Providers Task Force's participation respectfully requests that the Commission:

1. Receive for filing and docket this Petition to Intervene and order that the Providers Task Force's participation be an active party to such proceedings and be placed on all services lists.

2. Order that the following individuals be designated as the Providers Task Force's participation'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](mailto:jlvullo@bvrrlaw.com)  
Counsel for Pennsylvania Weatherization Providers Task Force

3. Order that each party to the proceedings provide the Providers Task Force's participation designated recipient with copies of all papers filed.

4. Order that public hearings be conducted in Columbia Gas of Pennsylvania, Inc.'s service territories.

5. Grant such other relief as the Commission may deem necessary and proper.

Respectfully submitted,

s/ Joseph L. Vullo  
JOSEPH L. VULLO, ESQUIRE  
I.D. No. 41279  
1460 Wyoming Avenue  
Forty Fort, PA 18704  
(570) 288-6441  
e-mail: [jlvullo@bvrrlaw.com](mailto:jlvullo@bvrrlaw.com)  
Attorney for Pennsylvania Weatherization  
Providers Task Force, Inc.

**EXHIBIT A**

**PENNSYLVANIA WEATHERIZATION PROVIDERS  
MEMBER AGENCIES**

Action Housing

Housing Authority of the County of Beaver

**VERIFICATION**

I, Eugene M. Brady, Chairman of the Pennsylvania Weatherization Providers Task Force, Inc. 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.

PENNSYLVANIA WEATHERIZATION  
PROVIDERS TASK FORCE, INC.

BY: s/ Eugene M. Brady  
Eugene M. Brady, Chairman

Dated: May 4, 2021

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission	:	
	:	
v.	:	Docket No.    R-2021-3024750
	:	
Duquesne Light Company	:	

**CERTIFICATE OF SERVICE**

The undersigned certified that he served a copy of the foregoing Pennsylvania Weatherization Providers Task Force Petition to Intervene upon the following participants this 4th day of May, 2021, via electronic mail:

Anthony D. Kanagy, Esquire  
Post & Schell, P.C.  
17 North Second Street  
12<sup>th</sup> Floor  
Harrisburg, PA 17101  
[akanagy@postschell.com](mailto:akanagy@postschell.com)

Scott Granger, Esquire  
Bureau of Investigation & Enforcement  
Commonwealth Keystone Building  
400 North Street, 2<sup>nd</sup> Floor West  
Harrisburg, PA 17105-3265  
[sgranger@pa.gov](mailto:sgranger@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](mailto:tmccloskey@paoca.org)

Sharron Webb  
Office of Small Business Advocate  
555 Walnut Street  
1st Floor, Forum Place  
Harrisburg, PA 17101  
[swebb@pa.gov](mailto:swebb@pa.gov)

Scott J. Rubin  
Public Utility Consulting  
333 Oak Lane  
Bloomsburg, PA 17815  
[Scott.j.rubin@gmail.com](mailto:Scott.j.rubin@gmail.com)

John W. Sweet, Esquire  
Elizabeth R. Marx, Esquire  
Ria Pereira, Esquire  
Lauren N. Berman, Esquire  
Pennsylvania Utility Law Project  
118 Locust Street  
Harrisburg, PA 17101  
[pulp@palegalaid.net](mailto:pulp@palegalaid.net)

William H. Roberts, II, Esquire  
PNG Companies, LLC  
375 North Shore Drive  
Pittsburgh, PA 15212  
[William.h.roberts@peoples-gas.com](mailto:William.h.roberts@peoples-gas.com)

Mark C. Szybist, Esquire  
1152 15<sup>th</sup> Street NW, Suite 300  
Washington, D.C. 20005  
[mszybist@nrdc.org](mailto:mszybist@nrdc.org)

Derrick Price Williamson  
Barry A. Naum  
Spilman, Thomas & Battle, PLLC  
1100 Bent Creek Boulevard, Suite 101  
Mechanicsburg, PA 17050  
[dwilliamson@spilmanlaw.com](mailto:dwilliamson@spilmanlaw.com)  
[bnaum@spilmanlaw.com](mailto:bnaum@spilmanlaw.com)

Dilworth Paxson, LLP  
Penn National Insurance Building  
2 North 2nd Street  
Suite 1101  
Harrisburg, PA 17101

Sarah C. Stoner, Esquire  
Daniel Clearfield, Esquire  
Eckert Seamans Cherin & Mellott, LLC  
213 Market Street, 8th Floor  
Harrisburg, PA 17101  
[sstoner@eckertseamans.com](mailto:ss Stoner@eckertseamans.com)  
[dclearfield@eckertseamans.com](mailto:dclearfield@eckertseamans.com)

Matthew F. Smith, Esquire  
Cozen O'Connor  
One Oxford Centre  
301 Grant Street, 26<sup>th</sup> Floor  
Pittsburgh, PA 15219  
[mfsmith@cozen.com](mailto:mfsmith@cozen.com)

Brian Kalcic  
Excel Consulting  
225 South Meramec Avenue  
Suite 720T  
St. Louis, MO 63105  
[Excel.consulting@sbcglobal.net](mailto:Excel.consulting@sbcglobal.net)

Joseph Otis Minott, Esquire  
Logan Welde, Esquire  
Clean Air Council  
135 South 19th Street  
Suite 300  
Philadelphia, PA 19103  
[joeminott@cleanair.org](mailto:joeminott@cleanair.org)  
[lwelde@cleanaire.org](mailto:lwelde@cleanaire.org)

Emily Collins, Esquire  
Fair Shake Environmental Legal Services  
3495 Butler Street  
Suite 102  
Pittsburgh, PA 15201  
[Ecollins@fairshake-els.org](mailto:Ecollins@fairshake-els.org)

s/ Joseph L. Vullo  
JOSEPH L. VULLO, ESQUIRE  
I.D. No. 41279  
1460 Wyoming Avenue  
Forty Fort, PA 18704  
(570) 288-6441  
e-mail: [jlullo@bvrrlaw.com](mailto:jlullo@bvrrlaw.com)  
Attorney for Pennsylvania Weatherization  
Providers Task Force