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April 26, 2012	CRE	112 <u>A</u>	五
Secretary Rosemary Chiavetta Pennsylvania Public Utility Commission Commonwealth Keystone Building 400 North Street, Second Floor Harrisburg, PA 17120	PA P.U.C. TARY'S BUREAL	PR 30 - MHT1:3	ECEIVED
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RE:

PPL Electric Utilities Corporation - Supplement No. 118 to Tariff -

Electric Pa. PUC No. 201 Docket No. R-2012-2290597

Dear Secretary Chiavetta:

Enclosed please find an original and four (4) copies of Commission on Economic Opportunity's Petition to Intervene. I would ask that you provide me with a time-stamped copy of the Petition in the self-addressed, stamped envelope enclosed.

As indicated by the Certificate of Service, I have provided copies of the same to the all parties of record.

If you need anything further, please do not hesitate to contact me.

Respectfully yours,

Joseph L. Vulla

JLV/jar encls.

cc: All Parties of Record

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PA P.U.C. SECRETARY'S BUREAU

# BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

PPL Electric Utilities Corporation
Supplement No. 118 to Tariff - Electric

Docket No. R-2012-2290597

Pa.P.U.C. No. 201

#### **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 PPL Electric Utilities Corporation's Supplement No. 118 to Tariff Electric Pa. P.U.C. No. 201 filed with the Commission.
- 4. CEO is a customer of PPL Electric Utilities Corporation and CEO serves clients who are customers of PPL.
- 5. CEO seeks permission to intervene in PPL'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 rate increase or change in rate structure 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 or change in rate structure on those programs and the Company's low income customers.
- 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 proposed increase in the monthly customer charge along with the proposed rate structure as those changes 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 individual be designated as CEO's recipient for service:

Joseph L. Vullo, Esquire 1460 Wyoming Avenue Forty Fort, PA 18704 Phone: (570) 288-6441

Fax: (570) 288-4598 e-mail: jlvullo@aol.com

- 4. Order that each party to the proceedings provide CEO's designated recipient 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: <u>jlvullo@aol.com</u>

#### **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

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EUGENE M. BRADY, Executive Director

Dated:

SECRETARY'S BUREA

## BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

PPL Electric Utilities Corporation

Supplement No. 118 to Tariff - Electric

Pa.P.U.C. No. 201

Docket No. R-2012-2290597

#### **CERTIFICATE OF SERVICE**

The undersigned certified that he served a copy of the foregoing Petition to Intervene upon the following participants this  $\frac{\partial}{\partial t}$  day of April, 2012, via first-class mail:

David B. MacGregor, Esquire Post & Schell, PC Four Penn Center 1600 John F. Kennedy Boulevard Philadelphia, PA 19103

Michael W. Gang, Esquire John H. Isom, Esquire Post & Schell, PC 17 North Second Street 12<sup>th</sup> Floor Harrisburg, PA 17101-1601

Paul E. Russell, Esquire PPL Services Corporation Two North Ninth Street GENTW4 Allentown, PA 18101-11796 Irwin A. Popowsky, Esquire Office of Consumer Advocate 555 Walnut Street 5<sup>th</sup> Floor Harrisburg, PA 17101-1923

J. Edward Simms, Esquire
Bureau of Investigation & Enforcement
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street
3rd Floor
Harrisburg, PA 17120

Steven C. Gray, Esquire Office of Small Business Advocate Suite 1102, Commerce Building 300 North Second Street Harrisburg, PA 17101

RECEIVED 012 APR 30 AM 11: 3 SECRETARY'S BUREA JOSEPH L. VULLO, ESQUIRE
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Attorney for Commission on Economic Opportunity

