



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.

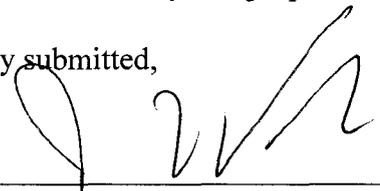
3. Order that the following individual be designated as CEO's recipient for service:

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



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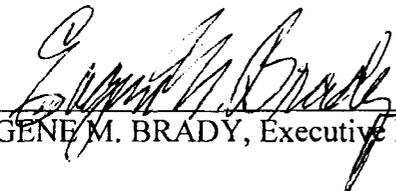
JOSEPH L. VULLO, ESQUIRE  
Burke Vullo Reilly Roberts  
1460 Wyoming Avenue  
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(570) 288-6441  
e-mail: [jlvullo@aol.com](mailto:jlvullo@aol.com)

**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: \_\_\_\_\_

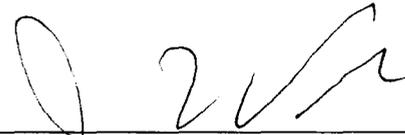
4/9/2015



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Opportunity