

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission	:	Docket No. R-2015-2469275
	:	
	:	
	:	
v.	:	
	:	
	:	
PPL Electricity Utilities Corporation	:	

NOTICE OF INTERVENTION OF NATURAL RESOURCES DEFENSE COUNCIL

Pursuant to 52 Pa. Code §§ 5.72-5.75 Natural Resources Defense Council (“NRDC”) hereby files this Notice of Intervention in the above captioned proceeding, and in support of its intervention states as follows:

1. NRDC is an environmental organization and not-for-profit corporation with more than 1.4 million members and online activists, including nearly 54,000 in Pennsylvania. Since 1970, NRDC’s attorneys, scientists, and other environmental specialists have worked to protect the world’s natural resources, public health, and the environment. NRDC’s top institutional priority is curbing global warming emissions and building a clean energy future, among other things through the increased use of energy efficiency and renewable energy, including distributed generation.

2. NRDC has Pennsylvania members who reside in PECO’s service area, including but limited to Jackson and Rachel Morris, who reside at 100 Center Road, Danville, Pennsylvania 17821.

NRDC’s attorney in this matter is:

Mark C. Szybist, Esq.
(PA ID 94112)
E-Mail: mszybist@nrdc.org
1152 15th St. NW, Suite 300
Washington, DC 20005
Telephone: (202) 289-2422

3. On March 31, 2015, PPL Electric Utilities Corporation (“PPL”) submitted a rate filing, Supplement No. 179 to PPL Electric Tariff – Electric PA. P.U.C. No. 201, which proposes to increase its distribution revenue by approximately \$167.5 million. Such an increase would equate to an average increase in distribution rates of 18.5% and an overall increase of approximately 3.9%. In addition, Supplement No. 179 contains revisions and modifications to PPL’s currently effective tariff.

4. The Commission’s regulations allow intervention by persons, as defined in 52 Pa. Code § 1.8, where a person has an interest in the proceeding that may be directly affected and is not adequately represented by existing parties, and as to which the person may be bound by the action of the Commission. 52 Pa. Code § 5.72(a)(2). Intervention is also permitted where participation of the person may be in the public interest. 52 Pa. Code § 5.72(a)(3).

5. NRDC meets the standards for intervention set forth in 52 Pa. Code § 5.72(a) because NRDC is not only committed to expanding energy efficiency and renewable energy in Pennsylvania, thereby reducing the need to burn fossil fuels to generate electricity and emissions of carbon dioxide and other pollutants, but has expended organizational resources in Pennsylvania to expand the uses of these resources. Among other things, NRDC is a partner in Energy Efficiency for All, a partnership that seeks to provide energy efficiency benefits to low-income persons who live in multifamily homes in Pennsylvania and several other states.

6. NRDC’s interests in this proceeding are unique from and not adequately represented by other parties that may seek to intervene because of NRDC’s long-standing

commitment to improving air quality and expanding energy efficiency and renewable energy in Pennsylvania and elsewhere, and its employment of scientists and other persons with special expertise in air quality, energy efficiency, renewable energy, and public utility matters.

7. NRDC's intervention is in the public interest because, in addition to the special expertise noted above and NRDC's Pennsylvania-specific experience, NRDC has experience concerning public utility proceedings in other states that could inform the proceedings in this matter.

8. Due to the early stage of this proceeding, NRDC reserves the right to raise and address issues identified through its continued review and analysis of PECO's rate increase proposal (and related information) or other issues raised by other parties.

WHEREFORE, NRDC respectfully requests that the Commission grant this Petition to Intervene.

Respectfully submitted,

/s/ Mark C. Szybist
Attorney for Natural Resources Defense Council

Date: May 12, 2015

VERIFICATION

I verify that the facts contained in the foregoing pleading are true and accurate to the best of my knowledge and that I am duly authorized to make this verification, and that I expect to be able to prove the same at any hearing held in this matter.

/s/ Mark Szybist
Mark Szybist, Esquire

CERTIFICATE OF SERVICE

I hereby certify that this day I served a copy of NRDC's Notice of Intervention upon the persons listed below in the manner indicated in accordance with the requirements of 52 Pa. Code § 1.54.

Via First Class Mail

David B. MacGregor, Esquire Post & Schell, P.C. Four Penn Center 1600 John F. Kennedy Blvd. Philadelphia, PA 19103	Michael W. Gang, Esquire Christopher T. Wright, Esquire Post & Schell, P.C. 17 North Second Street 12 th Floor Harrisburg, PA 17101
Steven C. Gray, Esquire Office of Small Business Advocate 300 North Second Street Suite 202 Harrisburg, PA 17101	Darryl Lawrence, Esquire Lauren M. Burge, Esquire Hobart J. Webster, Esquire Office of Consumer Advocate 555 Walnut Street 5 th Floor Forum Place Harrisburg, PA 17101
Paul E. Russell, Esquire Kimberly A. Klock, Esquire PPL Electric Utilities Corporation GENTW4 Allentown, PA 18101	Joseph L. Vullo, Esquire Burke Vullo Reilly Roberts 1460 Wyoming Avenue Forty Fort, PA 18704
Eric Joseph Epstein 4100 Hillsdale Road Harrisburg, PA 17112	Elizabeth R. Marx, Esq. Harry S. Geller, Esq. Pennsylvania Utility Law Project 118 Locust Street Harrisburg, PA 17101
Kenneth L. Mickens, Esquire LLC 316 Yorkshire Drive Harrisburg, PA 17111	Pamela C. Polacek, Esquire Adeolu A. Bakare, Esquire McNees Wallace & Nurick LLC 100 Pine Street P.O. Box 1166 Harrisburg, PA 17108

Joseph Otis Minott, Esquire Ernest Logan Welde, Esquire Benjamin Z. Hartung, Esquire Clean Air Council 135 S. 19th Street, Suite 300 Philadelphia, PA 19103	
--	--

Date: May 12, 2015

/s/ Mark Szybist
Mark Szybist, Esquire