

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

PPL Electric Utilities Corporation – Petition :
For Approval of Act 129 Phase III Energy : Docket No. M-2015-2515642
Efficiency & Conservation Plan :

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 Petition for Approval of Act 129 Phase III Energy Efficiency & Conservation Plan filed with the Commission.

4. PPL Electric Utilities Corporation serves customers in numerous counties including Luzerne County. Additionally, CEO is a customer of PPL Electric, is a contractor under PPL's regular WRAP program and under its Act 129 Phase II low-income program.

5. CEO also was an active party in PPL's last rate case and has participated in the Commission's Act 129 procedures and specifically in proceedings concerning PPL's prior Act 129 plans.

6. CEO seeks permission to intervene in this matter to address in large part the low-income portion of the Company's Plan. CEO reserves the right to address other parts of the Company's plan.

7. 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 they receive the energy consumption benefits as required under Act 129. Accordingly, CEO's participation in this proceeding will serve the public interest.

8. 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

9. CEO reserves the right to address all portions of the Company's Plan but its main purpose is to address that portion of the Plan that addresses low-income customers.

11. There is a substantial public interest in ensuring that low-income customers receive the consumption reduction benefits as required under Act 129.

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.

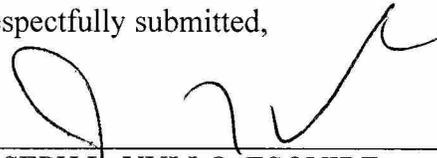
3. Order that the following individual be designated as CEO=s recipients for service:

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



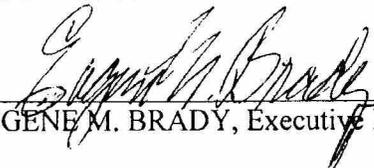
JOSEPH L. VULLO, ESQUIRE
Burke Vullo Reilly Roberts
1460 Wyoming Avenue
Forty Fort, PA 18704
(570) 288-6441
e-mail: jlvullo@aol.com

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: _____

12/22/15

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CERTIFICATE OF SERVICE

The undersigned certified that he served a copy of the foregoing Commission on Economic Opportunity’s Petition to Intervene upon the following participants this 22 day of December, 2015, via first-class mail and electronic mail:

Paul E. Russell, Esquire
Kimberly A. Klock, Esquire
PPL Electric Utilities Corporation
2 North Ninth Street
Allentown, PA 18101

Johnnie Simms, Esquire
PA PUC Office of Investigations &
Enforcement
P.O. Box 3265
Harrisburg, PA 17105-3265

David B. MacGregor, Esquire
Post & Schell, PC
Four Penn Center
1600 John F. Kennedy Boulevard
Philadelphia, PA 19103-2808

Carl Schultz, Esquire
Eckert, Seamans, Cherin & Mellott
213 Market Street
8th Floor
Harrisburg, PA 17101

Devin T. Ryan, Esquire
Post & Schell, PC
17 North 2nd Street
12th Floor
Harrisburg, PA 17101-1601

Julia A. Conover, Esquire
Christopher M. Arfaa, Esquire
Hawke, McKeon & Sniscak, LLP
100 North Tenth Street
Harrisburg, PA 17101

Dianne E. Dusman, Esquire
Amy E. Hirakis, Esquire
Office of Consumer Advocate
5th Floor Forum Place
555 Walnut Street
Harrisburg, PA 17101

Patrick Cicero, Esquire
Harry S. Geller, Esquire
Elizabeth R. Marx, Esquire
PA Utility Law Project
118 Locust Street
Harrisburg, PA 17101

Elizabeth Rose Triscari, Esquire
Office of Small Business Advocate
300 North Second Street
Suite 202
Harrisburg, PA 17101

Derrick Price Williamson, Esquire
Barry A. Naum, Esquire
Spilman, Thomas & Battle PLLC
1100 Bent Creek Boulevard, Suite 101
Mechanicsburg, PA 17050

Judith D. Cassel, Esquire
Hawke, McKeon & Sniscak, LLP
100 North Tenth Street
Harrisburg, PA 17101

Mark C. Morrow, Esquire
UGI Corporation
460 North Gulph Road
King of Prussia, PA 19406

Pamela C. Polacek, Esquire
Adeoule A. Bakare, Esquire
McNees, Wallace & Nurick
100 Pine Street
P.O. Box 1166
Harrisburg, PA 17108-1166



JOSEPH L. VULLO, ESQUIRE
I.D. No. 41279
1460 Wyoming Avenue
Forty Fort, PA 18704
(570) 288-6441
e-mail: jlvullo@bvrrlaw.com
Attorney for Commission on Economic
Opportunity