



February 29, 2016

KENNETH L. MICKENS, ESQUIRE LLC
LEGAL CONSULTING

E-FILING

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17105-3265

**Re: Petition of PPL Electric Utilities Corporation
for Approval of a Default Service Program and
Procurement Plan for the Period June 1, 2017
through May 31, 2021
Docket No. P-2016-2526627 - Petition to Intervene
of the Sustainable Energy Fund**

Dear Secretary Chiavetta:

Enclosed for filing with the Commission is the Petition to Intervene of the Sustainable Energy Fund ("SEF") in the above-captioned proceeding. I have also enclosed the Affidavit of John M. Costlow, the President/CEO of SEF. Copies have been served today on all known parties to this proceeding. A Certificate of Service is attached. Please contact me if you have any questions.

Sincerely,

A handwritten signature in blue ink that reads "Kenneth L. Mickens".

Kenneth L. Mickens, Esquire
Attorney for the Sustainable
Energy Fund

KLM/bls
Certificate of Service
Enclosures

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**Petition of PPL Electric Utilities
Corporation for Approval of a :
Default Service Program and : Docket No. P-2016-2526627
Procurement Plan for the Period :
June 1, 2017 through May 31, 2021 :**

**PETITION TO INTERVENE OF
THE SUSTAINABLE ENERGY FUND OF
CENTRAL EASTERN PENNSYLVANIA**

TO THE PENNSYLVANIA PUBLIC UTILITY COMMISSION:

The Sustainable Energy Fund of Central Eastern Pennsylvania (“SEF”), by and through its attorney, Kenneth L. Mickens, hereby files this Petition to Intervene in the above-captioned proceeding pursuant to 52 Pa. Code § 5.71, *et. seq.* In support of its intervention, SEF avers as follows:

I. BACKGROUND

1. On February 5, 2016, PPL Electric Utilities Corporation (“PPL Electric” or “Company”) filed with the Pennsylvania Public Utility Commission (“Commission”) a request for approval of its fourth Default Service Program and Procurement Plan (“DSP IV Program”) to establish the terms and conditions under which PPL Electric will acquire and supply

default service or provider of last resort service (“Default Service”), from June 1, 2017 through May 31, 2021 (the “DSP IV Program Period”).

2. The DSP IV Program consists of a proposal for the competitive procurement of Default Service supply and related Alternative Energy Credits (“AECs”) during the DSP IV Program Period; an implementation plan; a proposed rate design, including a Time-of-Use (“TOU”) rate option for Default Service during the DSP IV Program Period; a proposal to continue the Company’s current Standard Offer Referral Program; a proposal to allow Customer Assistance Program (“CAP”) customers to shop; and, a contingency plan for the DSP IV Program. PPL Electric requests that the Pennsylvania Public Utility Commission approve the DSP IV Program within nine (9) months or no later than October 28, 2016, to provide sufficient time to implement procurement under the DSP IV Program. PPL Electric Petition, pp. 1-2.

3. SEF is a Pennsylvania corporation established at the conclusion of PPL Electric’s Restructuring proceeding and pursuant to the terms of the Joint Settlement of that proceeding, approved by the Commission’s August 27, 1998 Order at Docket No. R-00973954. SEF’s mission is to promote and invest in energy efficiency, energy conservation, renewable energy and energy education in order to provide opportunities and benefits for PPL

Electric ratepayers.

4. SEF's address is as follows:

The Sustainable Energy Fund of Central Eastern Pennsylvania
1005 Brookside Road, Suite 210
Allentown, PA 18106

5. The name, address and telephone number of SEF's attorney are:

Kenneth L. Mickens, Esq.
PA Attorney I.D. #31255
316 Yorkshire Drive
Harrisburg, PA 17111
kmickens11@verizon.net (e-mail)
(717) 343-3338 (Telephone)
(717) 657-0938 (FAX)

II. SEF's INTEREST IN THE PROCEEDING

6. SEF's mission, as mentioned above, is to promote and invest in energy efficiency, energy conservation, renewable energy and energy education that provide opportunities and benefits for PPL Electric customers. In furtherance of its mission, SEF is engaged in projects that emphasize renewable energy sources, such as solar and wind power development, clean energy technologies, energy conservation and efficiency, as well as energy education. In this regard, SEF has been certified as a Conservation Services Provider.

7. SEF's mission, in large part, is focused on reductions in consumption and demand for the non-renewable, non-sustainable production

of electricity within the PPL Electric service territory. SEF's interest in this Default Service proceeding relates to PPL Electric's proposed Time-of-Use plan and the proposed Time-of-Use Net Metering plan. Time of use rates impact non-sustainable power plant emissions, while net metering reduces the barrier to the implementation of sustainable sources of electricity. In other words, these proposed plans directly impact sustainable energy production and the reduction of non-sustainable sources of electricity. Consequently, SEF would like to explore the potential impact of PPL Electric's proposed plans.

8. Accordingly, SEF's intervention is necessary to ensure the development of a complete record on the reasonableness of the proposed plans. SEF has a unique perspective, in keeping with its mission to promote and invest in energy efficiency, energy conservation, renewable energy and energy education that provide opportunities and benefits for PPL Electric ratepayers that cannot be represented by any other party to this proceeding. SEF submits that this unique interest coincides with the public interest and should be considered by the Commission.

9. Moreover, SEF has experience and expertise in matters of energy efficiency, energy conservation and consumer education such that its participation in this proceeding would benefit the record.

10. SEF intends to actively participate in this proceeding.

WHEREFORE, for the reasons discussed herein, the Sustainable Energy Fund of Central Eastern Pennsylvania requests that the Pennsylvania Public Utility Commission grant its Petition to Intervene in the above-captioned proceeding and grant it full party status.

Respectfully submitted,



Kenneth L. Mickens, Esq.

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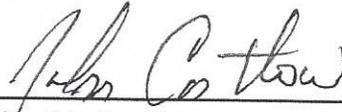
FAX: (717) 657-0938

Attorney for The Sustainable Energy
Fund

DATED: February 29, 2016

AFFIDAVIT

I, John M. Costlow, certify that I am President/CEO of the Sustainable Energy Fund and that, in said capacity, I am authorized to and do make this Affidavit for it, that the facts set forth in the foregoing SEF Petition to Intervene (Docket # P-2016-2526627) are true and correct to the best of my knowledge, information and belief. I understand that false statements made herein are made subject to the penalties of 18 Pa. C.S. § 4904, relating to unsworn falsifications to authorities.



John M. Costlow
President/CEO
Sustainable Energy Fund

Dated: February 29, 2016

CERTIFICATE OF SERVICE
Docket No. P-2016-2526627

I hereby certify that I have this day served a copy of the foregoing Petition to Intervene via first-class mail upon the following participants in accordance with the requirements of 52 Pa. Code Section 1.54, *et. seq.* (*relating to service by a participant*):

David B. MacGregor, Esquire
Post & Schell, P.C.
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Harrisburg, PA 17101

Honorable Susan D. Colwell
Administrative Law Judge
Pennsylvania Public Utility Commission
P.O. Box 3265
Harrisburg, PA 17105-3265


Kenneth L. Mickens, Esq.
Attorney for the Sustainable Energy
Fund

Dated: February 29, 2016