

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Duquesne Light Company – Petition for :
Approval of Its Long-Term Infrastructure : Docket No. P-2016-2540046
Improvement Plan :

**COMMUNITY ACTION ASSOCIATION OF PENNSYLVANIA’S
PETITION TO INTERVENE**

NOW COMES, the Community Action Association of Pennsylvania (CAAP), by and through counsel, Joseph L. Vullo, Esquire, and petitions to intervene in the above-captioned matter, averring as follows:

1. The Petitioner, Community Action Association of Pennsylvania, is a statewide association representing Pennsylvania’s community action agencies that provide anti-poverty planning and community development activities for low-income communities and services to individuals and families.

2. For more than 25 years, one of CAAP’s primary missions has been to represent the energy interests of low-income citizens in proceedings before the Pennsylvania Public Utility Commission and as such, CAAP has a direct and substantial interest in this proceeding that cannot be adequately represented by any other party.

3. CAAP is comprised of forty-three member agencies including agencies in Duquesne Light Company’s service areas.

4. CAAP was an active party in Duquesne’s most recent base rate case proceeding (R-2013-2372129) and seeks permission to intervene in the current Petition for Approval of Its Long-Term Infrastructure Improvement Plan pursuant to the above-captioned docket number.

5. CAAP has intervened and has been granted intervention and active party status in prior rate and/or acquisition cases before the Pennsylvania Public Utility Commission. Most recently, CAAP was granted intervenor status in the Columbia Gas rate case (R-2016-2529660).

6. CAAP seeks permission to intervene in Duquesne Light Company's Petition for Approval of Its Long-Term Infrastructure Improvement Plan to address in large part the portion of the Company's Plan that may impact low-income customers. CAAP reserves the right to address other parts of the Company's Plan.

7. CAAP'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 reliable service at a reasonable and affordable cost. Accordingly, CAAP's participation in this proceeding will serve the public interest.

8. Because CAAP represents low-income citizens in the Company's service areas, the interests of its clients are not protected by any other party to this action.

POSITIONS

9. CAAP 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 may impact low-income customers.

10. There is a substantial public interest in ensuring that low-income customers receive reliable service at a reasonable and affordable cost.

11. CAAP has been an active participant in the Company's prior requests for rate increases and other proceedings filed with the PUC.

REQUEST FOR RELIEF

WHEREFORE, CAAP respectfully requests that the Commission:

1. Receive for filing and docket this Petition to Intervene and order that CAAP be an active party to such proceedings and be placed on all services lists.

2. Grant to CAAP active party status with right to participate in all proceedings relative to this matter.

3. Order that the following individuals be designated as CAAP's recipients for service:

Joseph L. Vullo, Esquire
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e-mail: jlvullo@aol.com
Counsel for CAAP

4. Order that each party to the proceedings provide CAAP'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
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Attorney for Community Action Association
of Pennsylvania

VERIFICATION

I, SUSAN A. MOORE, Executive Director of the Community Action Association of Pennsylvania, 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.

COMMUNITY ACTION ASSOCIATION
OF PENNSYLVANIA

BY: _____


SUSAN A. MOORE
Executive Director

Dated: _____

10 / 12 / 2011

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CERTIFICATE OF SERVICE

The undersigned certified that he served a copy of the foregoing Community Action Association of Pennsylvania’s Petition to Intervene upon the following participants this 12th day of October, 2016, electronic mail and first-class mail:

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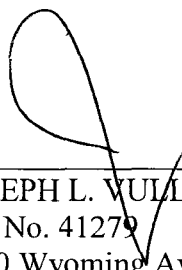
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