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April 23, 2018

via Electronic Filing

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
400 North Street, Filing Room
Harrisburg, PA 17120

RE: PA PUC v. PECO Energy Company
Docket No. R-2018-3000164

Dear Secretary Chiavetta:

Please accept for filing the Community Action Association of Pennsylvania's Petition to Intervene in the above-referenced matter. A copy of this filing was served in accordance with the attached Certificate of Service.

Respectfully submitted,



Joseph L. Vullo

JLV/jar
encl.

cc: All Parties of Record

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission :
 :
 v. : Docket No. R-2018-3000164
 :
PECO Energy Company :

**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 30 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-two member agencies including agencies in the PECO Energy Company's service areas. Specifically, the agencies listed in Exhibit A attached are members of CAAP and customers of PECO Energy Company.

4. CAAP seeks permission to intervene in PECO Energy Company's request for a general rate increase 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.

6. CAAP seeks permission to intervene in PECO Energy Company's request for a general rate increase to examine the effect of the proposed rate increase on their residential customers, particularly low-income customers.

7. CAAP is also intervening to investigate whether the Company's universal service programs are appropriately funded and available and if those programs will be appropriately funded and available if the proposed rate increase is granted.

8. 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 utility rates remain affordable to its clients. Accordingly, CAAP's participation in this proceeding will serve the public interest.

9. 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

10. CAAP takes no position at this time regarding the Company's request for rate increase but CAAP's participation in this proceeding is, in part, to study the effect of the proposed rate increase and structure on the Company's low-income customers and whether the Company's universal service programs will be appropriately funded and available.

11. There is a substantial public interest in ensuring that the Company's universal service programs are appropriately funded and available and the effect, if any, on those programs if the proposed rate increase is approved.

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

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Counsel for CAAP

3. Order that each party to the proceedings provide CAAP's designated recipient with copies of all papers filed.

4. Order that public hearings be conducted in PECO Energy Company's service territories.

5. Grant such other relief as the Commission may deem necessary and proper.

Respectfully submitted,

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Attorney for Community Action Association
of Pennsylvania

EXHIBIT A

**COMMUNITY ACTION ASSOCIATION OF PENNSYLVANIA
MEMBER AGENCIES**

Chester County Department of Community Development

Montgomery County Action Development Commission

Bucks County Opportunity Council Inc.

Mayor's Office of Community Empowerment and Opportunity

VERIFICATION

I, SUSAN A. MOORE, Executive Director of 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: 4.5.18

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PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission	:	
	:	
v.	:	Docket No. R-2018-3000164
	:	
PECO Energy Company	:	

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

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 23rd day of April, 2018, via first-class mail:

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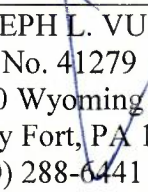
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Respectfully submitted,



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