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February 5, 2019

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor
Harrisburg, PA 17120

VIA ELECTRONIC FILING

**RE: PPL Electric Utilities Corporation Universal Service and Energy Conservation
Plan for 2017-2019 Submitted in Compliance with 52 Pa. Code § 54.74;
Docket No. P-2019-3007285**


Dear Secretary Chiavetta:

Enclosed for filing with the Pennsylvania Public Utility Commission ("PUC" or "Commission") is the Petition to Intervene of the PP&L Industrial Customer Alliance ("PPLICA"), in the above-referenced proceeding.

As evidenced by the attached Certificate of Service, all parties to the proceeding are being served with a copy of this document. Thank you.

Very truly yours,

McNEES WALLACE & NURICK LLC

By 
Alessandra L. Hylander

Counsel to the PP&L Industrial Customer Alliance

c: Office of Administrative Law Judge
Certificate of Service

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the foregoing document upon the participants listed below in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

VIA E-MAIL AND FIRST-CLASS MAIL

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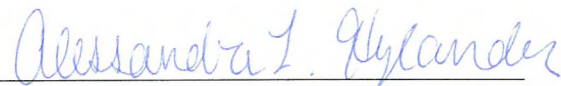
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Alessandra L. Hylander

Counsel to PP&L Industrial Customer Alliance

Dated this 5th day of February, 2019, at Harrisburg, Pennsylvania.

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

PPL Electric Utilities Corporation Universal : Docket No. P-2019-3007285
Service and Energy Conservation Plan for 2017- :
2019 Submitted in Compliance with 52 Pa. Code :
§ 54.74 :

**PETITION TO INTERVENE OF THE
PP&L INDUSTRIAL CUSTOMER ALLIANCE**

TO THE HONORABLE, THE PENNSYLVANIA PUBLIC UTILITY COMMISSION:

Pursuant to Sections 5.71-5.74 of the Pennsylvania Public Utility Commission's ("PUC" or "Commission") Regulations, 52 Pa. Code §§ 5.71-5.74, the PP&L Industrial Customer Alliance ("PPLICA") hereby submits this Petition to Intervene in the above-captioned proceeding. In support thereof, PPLICA avers as follows:

1. Petitioner is PPLICA, which, for purposes of this proceeding, includes the companies listed on Attachment "A" to this Petition. The list on Attachment A will be updated as necessary during this proceeding.

2. The names and address of PPLICA's attorneys are:

Pamela C. Polacek (Pa. I.D. No. 78276)
Adeolu A. Bakare (Pa. I.D. No. 208541)
Alessandra L. Hylander (Pa. I.D. No. 320967)
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3. On January 18, 2019, PPL Electric Utilities Corporation ("PPL" or "Company") filed a Petition ("January 18 Petition") to extend its current Universal Service and Energy Conservation Plan ("USECP") for 2017-2019, amend related filing dates, and grant a limited waiver of 52 Pa. Code § 54.74(a). Through its January 18 Petition, PPL requests that the PUC issue an Order on an expedited basis by its March 14, 2019 public meeting, which: (1) extends PPL's current 2017-2019 USECP through 2020; (2) amends the USECP filing schedule set forth in the Secretarial Letter dated June 27, 2014, to reflect that the six-year independent evaluation of the Company's USECP is due by March 1, 2020, and that PPL's next USECP is due by September 1, 2020; (3) grants a limited waiver of Section 54.74(a) of the PUC's regulations so that PPL can file its next USECP by September 1, 2020, and extend its current USECP for 2017-2019 through 2020; and (4) grants any other approvals or waivers that are needed to implement these requests.

4. PPLICA is an *ad hoc* association of energy-intensive commercial and industrial ("Large C&I") customers receiving electric service in PPL's service territory. PPLICA members purchase service from PPL primarily under Rate Schedules LP-4 and LP-5, as well as available riders. PPLICA members collectively consume approximately 1.08 billion kWh of electricity annually in manufacturing and other processes, and electricity costs comprise a significant portion of their production costs.

5. Although PPL's January 18 Petition appears to only request extensions of the current USECP and various amendments and waivers to effectuate that extension, PPLICA is concerned with any other potential changes to the USECP that could arise in this proceeding. Any changes to PPL's USECP could affect Large C&I customers. The costs and risks associated with USECPs should be borne only by those customers benefiting from those plans, and not by Large C&I

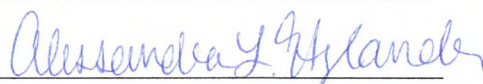
customers. As a result, PPLICA has an interest in participating in this proceeding to address any additional PPL USECP issues that may be raised.

6. PPLICA members may be directly affected by the Commission's resolution of the above-captioned proceeding. As some of PPL's largest retail customers, PPLICA members have an interest in this proceeding that is not represented by any other party of record; consequently, PPLICA satisfies the standards for intervention under Section 5.72 of the Commission's regulations. *See* 52 Pa. Code § 5.72.

WHEREFORE, the PP&L Industrial Customer Alliance respectfully requests that the Commission grant this Petition to Intervene and provide the PP&L Industrial Customer Alliance with intervenor status in this proceeding.

Respectfully submitted,

McNEES WALLACE & NURICK LLC

By 
Pamela C. Polacek (Pa. I.D. No. 78276)
Adeolu A. Bakare (Pa. I.D. No. 208541)
Alessandra L. Hylander (Pa. I.D. No. 320967)
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Counsel to the PP&L Industrial Customer Alliance

Dated: February 5, 2019

ATTACHMENT A

PP&L INDUSTRIAL CUSTOMER ALLIANCE

Air Products and Chemicals, Inc.
General Dynamics-OTS Scranton
Harristown Enterprises, Inc.
Hercules Cement Company
Linde LLC
SAPA Extrusions, Inc.
TIMET North America
Wegmans Food Markets, Inc.

