

# BURKE VULLO REILLY ROBERTS

ATTORNEYS AT LAW

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February 15, 2019

**via Electronic Filing**

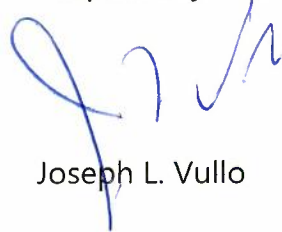
Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
400 North Street, Filing Room  
Harrisburg, PA 17120

RE: Pennsylvania Public Utility Commission v. Peoples Natural Gas  
Company, LLC  
Docket No. R-2018-3006818

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  
Office of Administrative Law Judge

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission	:	
	:	
v.	:	Docket No. R-2018-3006818
	:	
Peoples Natural Gas Company, LLC	:	

**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 over forty member agencies including agencies in the Peoples Natural Gas Company, LLC's service areas. CAAP's member agencies that are located in the Company's service territory are attached hereto as Exhibit A.

4. CAAP seeks permission to intervene in Peoples Natural Gas Company, LLC's General Base Rate Filing 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 Peoples Natural Gas Company, LLC's General Base Rate Filing to examine the effect of the proposed rate increase on their 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 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:

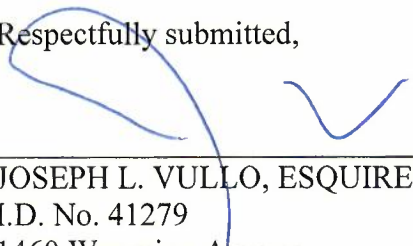
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e-mail: [jlvullo@bvrrlaw.com](mailto:jlvullo@bvrrlaw.com)  
Counsel for CAAP

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 Peoples Natural Gas Company, LLC's service territories.

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

Respectfully submitted,



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e-mail: [jlvullo@bvrrlaw.com](mailto:jlvullo@bvrrlaw.com)  
Attorney for Community Action Association  
of Pennsylvania

Exhibit A

Allegheny County – Allegheny County Department of Human Services &  
Pittsburgh Community Services Inc.

Armstrong County – Armstrong County Community Action Agency

Beaver County – Community Services Program of Beaver County

Blair County – Blair County Community Action Agency

Butler County – Butler County Community Action & Development

Cambria County – Community Action Partnership of Cambria County

Clarion County – Community Action, Inc.

Clearfield County – Central Pennsylvania Community Action, Inc.

Fayette County – Fayette County Community Action, Inc.

Greene County – Blueprints

Indiana County – Indiana County Community Action Program, Inc.

Jefferson County – Community Action, Inc.

Lawrence County– Lawrence County Community Action Partnership

Mercer County – Community Action Partnership of Mercer County, Inc.

Somerset County – Community Action Partnership for Somerset County

Venango County – Community Support Services of Venango & Crawford Counties

Washington County – Blueprints

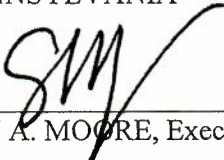
Westmoreland County – Westmoreland Community Action

**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: 2-14-19

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission	:	
	:	
v.	:	Docket No. R-2018-3006818
	:	
Peoples Natural Gas Company, LLC	:	

**CERTIFICATE OF SERVICE**

The undersigned certified that he served a copy of Community Action Association of Pennsylvania’s Petition to Intervene upon the following participants this 17<sup>th</sup> day of February, 2019, via first-class mail:

Anthony D. Kanagy, Esquire  
 Devlin T. Ryan, Esquire  
 Michael W. Gang, Esquire  
 Post & Schell  
 17 North Second Street  
 12<sup>th</sup> Floor  
 Harrisburg, PA 17101

Erin K. Fure, Esquire  
 Office of Small Business Advocate  
 300 North Second Street  
 Suite 202  
 Harrisburg, PA 17101

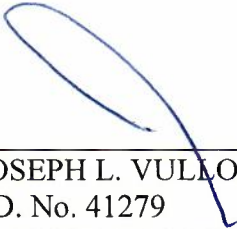
Richard A. Kanskie, Esquire  
 PA Public Utility Commission  
 Bureau of Investigation & Enforcement  
 Commonwealth Keystone Building  
 400 North Street  
 2<sup>nd</sup> Floor West  
 P.O. Box 3265  
 Harrisburg, PA 17105-3265

Paul Diskin, Director  
 Bureau of Technical Utility Services  
 Pennsylvania Public Utility Commission  
 400 North Street  
 Commonwealth Keystone Building  
 Harrisburg, PA 17120

Tanya J. McCloskey, Esquire  
 Office of Consumer Advocate  
 555 Walnut Street  
 5<sup>th</sup> Floor Forum Place  
 Harrisburg, PA 17101

William H. Roberts, II, Esquire  
 Peoples Natural Gas Company, LLC  
 375 North Shore Drive  
 Pittsburgh, PA 15212

Honorable Charles E. Rainey, Jr.  
 Office of Administrative Law Judge  
 Pennsylvania Public Utility Commission  
 400 North Street  
 Commonwealth Keystone Building  
 Harrisburg, PA 17120



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