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January 18, 2024

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-2023-3044549

Dear Secretary Chiavetta:

Please accept for filing the Pennsylvania Weatherization Providers Task Force Inc.'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

:

Docket No. R-2023-3044549

:

Peoples Natural Gas Company, LLC

v.

PENNSYLVANIA WEATHERIZATION PROVIDERS TASK FORCE INC.'S PETITION TO INTERVENE

NOW COMES, the Pennsylvania Weatherization Providers Task Force, Inc. by and through counsel, Joseph L. Vullo, Esquire, and petitions to intervene in the above-captioned matter, averring as follows:

- 1. The Petitioner, Pennsylvania Weatherization Providers Task Force, Inc. (Providers Task Force), is a Pennsylvania non-profit corporation and a statewide association of thirty-seven (37) organizations providing utility assistance and energy conservation services in each of the Commonwealth's sixty-seven counties.
- 2. The Providers Task Force, through its member agencies, Pennsylvania community-based organizations, administers universal service programs for a number of utility companies, including Peoples Natural Gas Company, LLC. Task Force members serve low-income ratepayers, and the Providers Task Force has a direct and substantial interest in this proceeding that cannot be adequately represented by any other party.
- 3. The agencies listed in Exhibit A attached are members of the Providers Task Force and customers of Peoples Natural Gas Company, LLC.
- 4. The Providers Task Force seeks permission to intervene in the Company's request for a general rate increase pursuant to the above-captioned docket number.
- 5. The Providers Task Force has been granted intervention as an active party by the Pennsylvania Public Utility Commission in a number of prior base rate cases and has been

involved in other matters before the Commission, including the submission of comments in matters concerning Act 129, utilities Universal Service and Energy Conservation Plans and general rule making proceedings.

- 6. The Providers Task Force seeks permission to intervene in the Company's request for a general rate increase to examine the effect of the proposed rate increase on their customers, particularly low-income customers.
- 7. The Providers Task Force 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. The Providers Task Force'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, the Providers Task Force's participation will serve the public interest.
- 9. Because the Providers Task Force's participation 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. The Providers Task Force's participation takes no position at this time regarding the Company's request for rate increase but it'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, the Providers Task Force's participation respectfully requests that the Commission:

- 1. Receive for filing and docket this Petition to Intervene and order that the Providers Task Force's participation be an active party to such proceedings and be placed on all services lists.
- 2. Order that the following individuals be designated as the Providers Task Force's participation's recipients for service:

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(570) 288-4598

e-mail: jlvullo@bvrrlaw.com

Counsel for Pennsylvania Weatherization Providers Task Force

- 3. Order that each party to the proceedings provide the Providers Task Force's participation designated recipient with copies of all papers filed.
- Order that public hearings be conducted in Peoples Natural Gas Company, LLC's 4. service territories.
 - 5. Grant such other relief as the Commission may deem necessary and proper.

Respectfully submitted,

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Attorney for Pennsylvania Weatherization

Providers Task Force, Inc.

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, JENNIFER WARABAK, a Member of the Pennsylvania Weatherization Providers Task Force, Inc. 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.

PENNSYLVANIA WEATHERIZATION PROVIDERS TASK FORCE, INC.

RY.

NNIFER WARABAK, Member

Dated: January 18, 2024

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

Pennsylvania Public Utility Commission :

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v. : Docket No. R-2023-3044549

:

Peoples Natural Gas Company, LLC

CERTIFICATE OF SERVICE

The undersigned certified that he served a copy of the foregoing Pennsylvania Weatherization Providers Task Force Petition to Intervene upon the following participants this 18th day of January, 2024, via electronic mail:

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Attorney for Pennsylvania Weatherization

Providers Task Force