

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of PPL Electric Utilities Corporation :
for Approval of a Rate Mitigation Plan : P-2009-2091280

**PETITION TO INTERVENE
OF CITIZENS FOR PENNSYLVANIA’S FUTURE**

Through counsel, Citizens for Pennsylvania’s Future (“PennFuture”) hereby files this Petition to Intervene pursuant to the Rules of Practice and Procedure of the Pennsylvania Public Utility Commission (the “Commission”), 52 Pa. Code § 5.41 and 5.71-5.76, and requests status as an Intervenor in the proceedings of the Commission in the above matter.

PennFuture states the following in support of its Petition to Intervene:

1. PennFuture is a Pennsylvania nonprofit corporation with offices in Harrisburg, Philadelphia, West Chester, Wilkes-Barre, and Pittsburgh, Pennsylvania (www.pennfuture.org). PennFuture's principal business location is 610 North Third Street, Harrisburg, PA 17101, tel. (717) 214-7920. PennFuture engages in policy development, public education, litigation and other strategies to achieve its goals, including promoting clean sources of energy and protecting Pennsylvania’s environment. PennFuture owns and uses offices at 610 North Third Street, which receives electric service from PPL Electric Utilities Corporation (“PPL Electric”). PennFuture also has members who live in the PPL Electric service territory, are customers of PPL Electric, and receive electrical service from PPL Electric.

2. The name and contact information of counsel for PennFuture is:

John K. Baillie, Esq.
Senior Attorney
Citizens for Pennsylvania's Future
425 Sixth Avenue, Suite 2770
Pittsburgh, Pennsylvania 15219
Phone: 412-258-6684
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baillie@pennfuture.org

3. PennFuture is directly and personally affected by this proceeding, which reasonably may be expected to affect the safety, reliability, cleanliness and affordability of its public utility service. PennFuture depends on electric distribution service from PPL Electric to meet basic necessities of its business operations and will suffer adverse financial consequences if service is not provided in a safe, reliable, clean, and affordable manner.

4. PennFuture has interests in, and perspectives on, issues in this proceeding that are not adequately represented by other parties of record.

5. As a ratepayer and member of the public, PennFuture has a right and interest in assuring that safe, reliable, clean and affordable public utility service, and participation in this proceeding is an appropriate way to protect these rights and interests.

6. PennFuture may intervene in this proceeding pursuant to 52 Pa. Code §§ 5.71-75.

7. PennFuture supports PPL Electric's Rate Mitigation Plan (the "RMP") to the extent that it offers PPL Electric's customers a tool they can use to protect themselves against the sudden spike in the rates they pay for their electric service when the charges for that service are permitted to adjust to reflect market costs after PPL's Electric's rate caps expire, on December 31, 2009. PennFuture believes that the RMP's failure to extend to all customers of up to 25kW maximum registered peak load (the RMP does not,

for example, extend to customers in PPL Electric's "OnTrack Program" and those customers enrolled in its Rate Stabilization Program) requires further analysis.

8. PennFuture opposes any extension of rate caps or other measures that might keep PPL Electric's service rates artificially low relative to market costs. Such measures harm consumers by discouraging new suppliers and technologies from entering the market, and harm consumers and the environment by discouraging conservation, discouraging the development of sources of renewable energy, and promoting the creation of greenhouse gases and other pollutants.

9. PennFuture reserves the right to raise other and more specific issues as necessary and appropriate during the course of the proceeding and to respond to issues raised by other parties.

WHEREFORE, PennFuture respectfully requests that the Commission grant its Petition and confer status on it as an Intervenor in this proceeding.

Respectfully submitted,

/s/

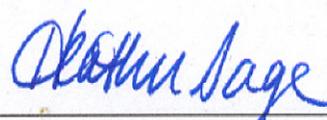
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DATE: March 30, 2009

VERIFICATION

I, Heather Sage, am the Vice President of Citizens for Pennsylvania's Future and am authorized to make this Verification on its behalf. I have read the foregoing Petition to Intervene of Citizens for Pennsylvania's Future, and verify that the statements of fact contained therein are true and correct to the best of my knowledge, information, and belief. I make this Verification subject to the penalties of 18 Pa. C.S. § 4904 relating to unsworn falsification to authorities.

Dated: March 27, 2009



Heather Sage