

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of PPL Electric Utilities Corporation	:	
for Approval of an Energy Efficiency and	:	M-2009-2093216
Conservation Plan	:	

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

Through counsel, Citizens for Pennsylvania’s Future (“PennFuture”) hereby files this Petition to Intervene and Protest pursuant to the Rules of Practice and Procedure of the Pennsylvania Public Utility Commission (the “Commission”), 52 Pa. Code §§ 5.41-44 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 and Protest:

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”). PennFuture also has numerous members who live in the PPL’s service territory, are customers of PPL, and receive electrical service from PPL.

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
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Phone: 412-258-6684
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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 to meet basic necessities of its business operations and will suffer adverse financial consequences if such 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 PPL delivers 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 has participated in the PPL's stakeholder input process, and submitted comments to the Commission in the matter captioned *Energy Efficiency and Conservation Program and EDC Plans*, Docket No. M-2008-2069887.

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

8. PennFuture intends to review and analyze PPL's Energy-Efficiency and Conservation Plan (the "Plan") and present testimony regarding whether the Plan will

permit PPL to provide public utility service in a manner that is safe, reliable, clean, affordable, cost effective, and efficient.

9. PennFuture protests the Plan because it does not include a mechanism to insure that when PPL has energy efficiency or conservation programs in common with other electric distribution companies (“EDCs”) across the state, the programs share standard eligibility thresholds, incentive levels, rebate structures, and education and training courses for suppliers. If the EDCs have consistent programs statewide, it will reduce program costs through economies of scale, reduce confusion among consumers and suppliers (many suppliers operate in more than one service territory), increase transparency, and increase the effectiveness of marketing and branding, thereby encouraging more conservation and implementation of energy efficiency measures. Upon information and belief, PPL met with representatives of at least one other EDC regarding joint programs, but did not reach any agreements regarding them. Further, PennFuture protests the Plan because it does not include a set schedule to move towards jointly held programs or a statewide program, specifically with respect to the education of contractors that may participate in multiple service territories.

10. 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/

John K. Baillie, Esq.

Pa. ID # 66903

Citizens for Pennsylvania's Future

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baillie@pennfuture.org

DATE: July 21, 2009

VERIFICATION

I, Courtney Lane, am a Policy Analyst for Citizen's for Pennsylvania's Future's Center for Energy, Enterprise, and the Environment. I am authorized to make this Verification on behalf of Citizens for Pennsylvania's Future. I hereby state that the facts in the foregoing Petition to Intervene and Protest are true and correct, and that I expect to be able to prove the same at a hearing held in this matter. I have registered to use the Public Utility Commission's electronic filing system in accordance with the registration instructions available on the Commission's web site and have obtained a user ID and password.

I understand that the statements made herein are subject to the penalties of 18 Pa. C.S. § 4904 (relating to unsworn falsification to authorities).

DATE: July 21, 2009

/s/
Courtney Lane

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CERTIFICATE OF SERVICE

I certify that I am serving a copy of the Petition to Intervene and Protest of Citizens for Pennsylvania's Future upon the persons addressed below, by email and first-class U.S. Mail:

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