



1424 Chestnut Street, Philadelphia, PA 19102-2505
Phone: 215.981.3700
Web Address: www.clsphila.org

July 29, 2009

By eFiling

James J. McNulty, Secretary
Pennsylvania Public Utility Commission
P.O. Box 3265
Harrisburg, PA 17105-3265

Re: Petition to Amend Philadelphia Gas Works' Universal Services and Energy Conservation
Plan 2008-2010, Docket No. M-00072021

Dear Secretary McNulty:

Enclosed for eFiling please find the **Petition to Intervene of Tenant Union Representative Network and Action Alliance of Senior Citizens of Greater Philadelphia**, in the above-captioned matter. Copies of the enclosed have been served upon the parties on the Certificate of Service attached.

Sincerely,

/s/ Philip A. Bertocci _____
Philip A. Bertocci, Esquire
Thu B. Tran, Esquire

Attorneys for TURN, et al.

Enclosure

cc: Certificate of Service List

crediting LIHEAP grants to the accounts of CRP participants. TURN is located at 1315 Walnut Street, Philadelphia, PA 19107.

3. The intervenor Action Alliance of Senior Citizens of Greater Philadelphia (“Action Alliance”) is a not-for-profit membership organization of senior citizens, many of whom are either customers of PGW or pay for PGW service through their rent. In those capacities, they have a direct, immediate, substantial and distinct interest in the proposed change to the method of crediting LIHEAP grants to the accounts of CRP participants. Action Alliance is located at 1319 Locust Street, Philadelphia, PA 19107.

4. The intervenors have been parties in prior Commission proceedings, including but not limited to, cases involving PGW rates, the amendment of Chapter 56 to comply with Chapter 14 of the Public Utility Code and the amendment of the Commission’s Policy Statement on Customer Assistance Programs.

5. Intervenors TURN and Action Alliance are represented by:

Philip A. Bertocci, Esquire
Thu B. Tran, Esquire
COMMUNITY LEGAL SERVICES, INC.
1424 Chestnut Street
Philadelphia, PA 19102
Telephone: 215-981-3702
Facsimile: 267-765-6481
E-mail: pbertocci@clsphila.org, ttran@clsphila.org

6. In the event that the Commission does approve PGW’s Petition, the Commission should condition approval on PGW’s agreement to perform such actions as are necessary to

assure compliance with applicable sections of the Public Utility Code, Commission regulations, guidelines and settlement agreements.

7. The intervenors have interests which will be directly affected and which are not adequately represented by other participants, and as to which the intervenors may be bound by the action of the Commission in this proceeding.

8. TURN et al. reserve the right to raise other issues as additional information becomes available in the course of the proceeding.

9. WHEREFORE, TURN et al. respectfully request that the Pennsylvania Public Utility Commission:

- (1) grant this Petition to Intervene; and
- (2) make such other order as is just and appropriate.

Respectfully submitted,

/s/ Philip A. Bertocci
Philip A. Bertocci, Esquire (Attorney ID: 32329)
Thu B. Tran, Esquire (Attorney ID: 83086)

Attorneys for TURN, et al.

COMMUNITY LEGAL SERVICES, INC.
1424 Chestnut Street
Philadelphia, PA 19102
(215) 981-3702

July 29, 2009

VERIFICATION

I, Phil Lord, on behalf of Tenant Union Representative Network (TURN), hereby state that the facts contained in the foregoing pleading are true and correct to the best of my knowledge, information and belief, that I am duly authorized to make this Verification, and that I expect to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 10 Pa.C.S. § 4904 (relating to unsworn falsification to authorities).

Date: July 29, 2009

/s/ Phil Lord
Title: Executive Director, TURN