

BURKE VULLO REILLY ROBERTS

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JOSEPH L. VULLO
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April 7, 2010

Mr. James J. McNulty, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, Second Floor
Harrisburg, PA 17120

RE: PPL Electric Utilities Corporation – Request for Rate Increase
Docket No. R-2010-2161694

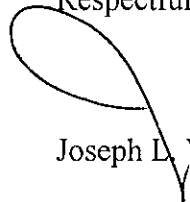
Dear Secretary McNulty:

Enclosed for filing please find an original and three (3) copies of Petition to Intervene on behalf of the Commission on Economic Opportunity in the above-referenced proceeding. I would ask that you provide me with a time-stamped copy of the Petition in the self-addressed, stamped envelope enclosed.

By copy of this correspondence, copies of the enclosed are being served on the parties of record as shown on the attached Certificate of Service.

If you need anything further from me, please do not hesitate to contact me.

Respectfully yours,



Joseph L. Vullo

JLV/jar
encls.

cc: All Parties of Record

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SECRETARY'S BUREAU

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

PENNSYLVANIA PUBLIC UTILITY	:	
COMMISSION,	:	
	:	
V.	:	R-2010-2161694
	:	
PPL ELECTRIC UTILITIES	:	Request for Rate Increase
CORPORATION	:	

PETITION TO INTERVENE

NOW COMES, the Commission on Economic Opportunity (CEO), by and through counsel, Joseph L. Vullo, Esquire, and petitions to intervene in the above-captioned matter averring as follows:

1. The Petitioner, Commission on Economic Opportunity, is a not-for-profit corporation organized and existing under the laws of the Commonwealth of Pennsylvania with its principal office located at 165 Amber Lane, P.O. Box 1127, Wilkes-Barre, Luzerne County, Pennsylvania, 18703-1127. CEO's telephone number is (570) 826-0510.

2. CEO is an advocate for its clients - the low income population of Luzerne County - and has been directly involved in assuring that low income persons' utility costs are contained through counseling, advice, payment assistance and energy conservation measures.

3. CEO seeks permission to intervene in PPL Electric Utilities Corporation's request for a rate increase filed with the Commission.

4. PPL Electric Utilities Corporation serves customers in numerous counties including Luzerne County.

5. CEO seeks permission to intervene in PPL Electric Utilities Corporation's request for a rate increase in large part to address the adequacy of the Company's programs for its low income customers and the effect of any proposed increase on those programs and customers.

6. CEO'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 for its clients and to ensure that its low income programs remain adequately funded and available. Accordingly, CEO's participation in this proceeding will serve the public interest.

7. Because CEO represents low income citizens in Luzerne County, the interests of its clients are not being protected by any other party to this action.

POSITIONS

8. CEO reserves the right to set forth its position on the proposed rate increase. CEO's main purpose is to address the adequacy of the Company's low income programs and the effect of any proposed rate increase on those programs.

9. There is a substantial public interest in keeping utility costs affordable for all members of the community and any increase in rates should be accompanied by an increase in funding available to the Company's low income programs so that its rates remain just and reasonable across all customer classes.

10. CEO will also address any rate designs that will impact a low income customer's motivations and ability to conserve energy.

11. CEO has been an active participant in this Company's prior requests for rate increases.

REQUEST FOR RELIEF

WHEREFORE, the Commission on Economic Opportunity respectfully requests that the Commission:

1. Receive for filing and docket this Petition to Intervene in order that CEO be a party to such proceedings and be placed on all service lists.
2. Grant to CEO active party status with the right to participate in all proceedings relative to this matter.
3. Order that the following individual be designated as CEO's recipients for service:

Joseph L. Vullo, Esquire
1460 Wyoming Avenue
Forty Fort, PA 18704
Phone: (570) 288-6441
Fax: (570) 288-4598
e-mail: jlvullo@aol.com
4. Order that each party to the proceedings provide CEO's designated recipients with copies of all papers filed.
5. Grant such other relief as the Commission may deem necessary and proper.

Respectfully submitted,

JOSEPH L. VULLO, ESQUIRE
Burke Vullo Reilly Roberts
1460 Wyoming Avenue
Forty Fort, PA 18704
(570) 288-6441
e-mail: jlvullo@aol.com

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VERIFICATION

I, EUGENE M. BRADY, Executive Director of Commission on Economic Opportunity, 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.

COMMISSION ON ECONOMIC
OPPORTUNITY

By: 
EUGENE M. BRADY, Executive Director

Dated: 7/6, 2010

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BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

PENNSYLVANIA PUBLIC UTILITY :
COMMISSION, :
 :
V. : R-2008-2079660
 :
PPL ELECTRIC UTILITIES : Request for Rate Increase
CORPORATION :


CERTIFICATE OF SERVICE

The undersigned certified that he served a copy of the foregoing Petition to Intervene upon the following participants this 7th day of April, 2010, via first-class mail:

Paul E. Russell, Esquire
PPL Electric Utilities Corp.
Two North Ninth Street
Allentown, PA 18101-1179

William R. Lloyd, Jr., Esquire
Office of Small Business Advocate
Suite 1102 Commerce Building
300 North Second Street
Harrisburg, PA 17101

Irwin A. Popowski, Esquire
Office of Consumer Advocate
555 Walnut Street
5th Floor Forum Place
Harrisburg, PA 17101-1923

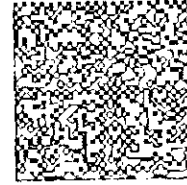


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Attorney for Commission on Economic
Opportunity

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04/07/2010
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Mr. James J. McNulty, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, Second Floor
Harrisburg, PA 17120