



April 16, 2010

KENNETH L. MICKENS, ESQ.

James J. McNulty, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17105-3265

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Re: PPL Electric Utilities Corporation
Request for Distribution Rate Increase
Docket No. R-2010-2161694
Petition to Intervene

Dear Secretary McNulty:

Enclosed for filing with the Commission are an original and three(3) copies of the Petition to Intervene of the Sustainable Energy Fund of Central Eastern Pennsylvania ("SEF") in the above-captioned proceeding. Also enclosed is the Affidavit of the President of SEF, Jennifer Hopkins and a Certificate of Service.

Please do not hesitate to contact me if you have any questions related to this filing.

Sincerely,

Kenneth L. Mickens, Esq.
Attorney for The Sustainable Energy
Fund of Central Eastern Pennsylvania
316 Yorkshire Drive
Harrisburg, PA 17111
(Telephone) (717) 343-3338
(FAX) (717) 657-0938

KLM/bls
Enclosures

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**PPL Electric Utilities Corporation :
Distribution Rate Increase Request : Docket No. R-2010-2161694
:**

**PETITION TO INTERVENE OF
THE SUSTAINABLE ENERGY FUND OF
CENTRAL EASTERN PENNSYLVANIA**

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TO THE PENNSYLVANIA PUBLIC UTILITY COMMISSION:

The Sustainable Energy Fund of Central Eastern Pennsylvania (“SEF”), by and through its attorney, Kenneth L. Mickens, hereby files this Petition to Intervene in the above-captioned proceeding pursuant to 52 Pa. Code § 5.71, *et. seq.* In support of its intervention, SEF avers as follows:

I. BACKGROUND

1. On April 1, 2010, PPL Electric Utilities Corporation (“PPL Electric” or “Company”) filed with the Pennsylvania Public Utility Commission (“Commission”) a request for approval of a \$114.7 million distribution rate increase or approximately 2.4% on a total billed revenue basis, effective for service rendered on and after June 1, 2010.

2. PPL Electric's President, David G. DeCampli, states that the increase is attributable to "declining sales due to the ongoing recession and implementation of mandatory conservation requirements imposed by Act 129 ..., increased operating expenses that are largely beyond the Company's control..., the need to undertake a major increase in capital expenditures to replace aging infrastructure and optimize the use of [PPL Electric's] assets in order to continue to provide reliable service to customers ..., and the need to access the capital markets on reasonable terms in order [to] obtain the funds necessary to undertake these important capital projects." PPL Electric St. 1, p. 5.

3. SEF is a Pennsylvania corporation established at the conclusion of PPL Electric's Restructuring proceeding and pursuant to the terms of the Joint Settlement of that proceeding, approved by the Commission's August 27, 1998 Order at Docket No. R-00973954. SEF's mission is to promote, research and invest in clean and renewable energy technologies, energy efficiency, energy conservation and sustainable energy enterprises that provide opportunities and benefits for PPL Electric ratepayers.

4. SEF's address is as follows:

The Sustainable Energy Fund of Central Eastern Pennsylvania
968 Postal Road, Suite 315
Allentown, PA 18109

5. The name, address and telephone number of SEF's attorney are:

Kenneth L. Mickens, Esq.
PA Attorney I.D. #31255
316 Yorkshire Drive
Harrisburg, PA 17111
kmickens11@verizon.net (e-mail)
(717) 343-3338 (Telephone)
(717) 657-0938 (FAX)

II. SEF's INTEREST IN THE PROCEEDING

6. SEF's mission, as mentioned above, is to promote and invest in energy efficiency, energy conservation, renewable energy and energy education that provide opportunities and benefits for PPL Electric customers. In furtherance of its mission, SEF is engaged in projects that emphasize renewable energy sources, such as solar and wind power development, clean energy technologies, energy conservation and efficiency, as well as energy education. In this regard, SEF has been certified as a Conservation Services Provider.

7. SEF's mission, in large part, is focused on reductions in consumption and demand for the non-renewable, non-sustainable production of electricity within the PPL Electric service territory. As such, this mission coincides with the Company's stated efforts in this distribution rate increase proceeding to move towards distribution rates that are more demand and customer dependent and less energy dependent. Specifically,

SEF is interested in how the Company's proposed rate increase will impact energy efficiency and renewable energy projects. SEF is also concerned about the Company's proposed modification to the Net Metering for Customer-Generators Rider and its impact on energy efficiency and renewable energy projects.¹ In addition, SEF would like to explore the impact of the implementation of PPL Electric's Energy Efficiency and Conservation Plan upon the Company and the need for additional distribution revenue as expressed by PPL Electric President DeCampi.

8. Accordingly, SEF's intervention is necessary to ensure the development of a complete record on the reasonableness of the proposed distribution rate increase request. SEF has a unique perspective, in keeping with its mission to promote and invest in energy efficiency, energy conservation, renewable energy and energy education that provide opportunities and benefits for PPL Electric ratepayers that cannot be represented by any other party to this proceeding. SEF submits that this unique interest coincides with the public interest and should be considered by the Commission.

9. Moreover, SEF has experience and expertise in matters of

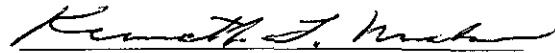
¹ SEF has also been active concerning PPL Electric's Universal Service Rider which the Company has apparently included in this distribution rate increase request.

energy efficiency, energy conservation and consumer education such that its participation in this proceeding would benefit the record.

10. SEF intends to actively participate in this proceeding.

WHEREFORE, for the reasons discussed herein, the Sustainable Energy Fund of Central Eastern Pennsylvania requests that the Pennsylvania Public Utility Commission grant its Petition to Intervene in the above-captioned proceeding and grant it full party status.

Respectfully submitted,



Kenneth L. Mickens, Esq.

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Harrisburg, PA 17111

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Attorney for The Sustainable Energy
Fund of Central Eastern Pennsylvania

DATED: April 16, 2010

AFFIDAVIT

I, Jennifer Hopkins, certify that I am the President of the Sustainable Energy Fund of Central Eastern Pennsylvania and that, in said capacity, I am authorized to and do make this Affidavit for it, that the facts set forth in the foregoing document are true and correct to the best of my knowledge, information and belief and that I expect the Sustainable Energy Fund of Central Eastern Pennsylvania to be able to prove the same at any hearing hereof. I understand that false statements made herein are made subject to the penalties of 18 Pa. C.S. Section 4904, relating to unsworn falsifications to authorities.



Jennifer Hopkins, President
Sustainable Energy Fund of
Central Eastern Pennsylvania

DATED: April 15, 2010

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CERTIFICATE OF SERVICE

I hereby certify that I have this day served a copy of the foregoing Petition to Intervene via first-class mail upon the following participants in accordance with the requirements of 52 Pa. Code Section 1.54, *et. seq.* (relating to service by a participant):

David B. MacGregor, Esquire
Post & Schell, P.C.
Four Penn Center
1600 John F. Kennedy Blvd.
Philadelphia, PA 17103-2808

Paul E. Russell, Esquire
Associate General Counsel
PPL Services Corporation
Two North Ninth Street
Allentown, PA 18101

Irwin A. Popowski, Esquire
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Suite 1102 Commerce Building
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Harrisburg, PA 17101



Kenneth L. Mickens, Esq.

Dated: April 16, 2010