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February 13, 2012

By eFiling

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
P.O. Box 3265
Harrisburg, PA 17105-3265

Re: Petition of PECO Energy Company for approval of its Default Service Program
Docket No. P-2012-2283641

Dear Secretary Chiavetta:

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 on the Petitioner and provided to the Administrative Law Judge.

Sincerely,

Thu B. Tran, Esquire
Robert W. Ballenger, Esquire
George D. Gould, Esquire

Attorneys for TURN, et al.

Enclosure

cc: Administrative Law Judge Dennis J. Buckley
PECO Energy

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of PECO Energy Company for approval of
its Default Service Program

Docket No. P-2012-2283641

**Petition to Intervene of Tenant Union Representative Network and
Action Alliance of Senior Citizens of Greater Philadelphia**

The Tenant Union Representative Network (“TURN”) and Action Alliance of Senior Citizens of Greater Philadelphia (collectively “TURN et al.”), through counsel Community Legal Services, Inc., hereby file this Petition to Intervene in the above-captioned proceeding, pursuant to the provisions of the Rules of Practice and Procedure of the Pennsylvania Public Utility Commission (“PUC” or “Commission”), 52 Pa. Code §§ 5.71-5.76, and in support, state as follows:

1. On January 13, 2012, PECO Energy Company filed a Petition for Approval of its Default Service Plan, pursuant to 66 Pa. C. S. § 2807(e) of the Public Utility Code, the Default Service Regulations of the Commission and the Commission's Policy Statement on Default Service.
2. On January 28, 2012, the Pennsylvania Bulletin published a Notice of the instant Petition and provided a deadline of February 13, 2012 for the filing of formal protests, petition to intervene and answers.
3. The intervenor Tenant Union Representative Network (“TURN”) is a not-for-profit advocacy organization composed of moderate and low income tenants, all either customers of or dependent on electricity service from PECO Energy. In those capacities, they have a direct,

immediate, substantial and distinct interest in the impact of the proposed Default Service Plan. TURN is located at 1315 Walnut Street, Philadelphia, PA 19107.

4. 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 customers of PECO Energy, on whom they rely for their electricity and gas needs, including cooling and heating. In those capacities, they have a direct, immediate, substantial and distinct interest in the impact of the proposed Default Service Plan. Action Alliance is located at 111 N. 53rd Street, Philadelphia, PA 19139.

5. The intervenors were parties in prior Commission proceedings involving PECO Energy, including, but not limited to, the following:

- a. Pennsylvania Public Utility Commission v. PECO Energy Company – Electric Division, Docket No. R-2010-2161575;
- b. Petition of PECO Energy for Approval of Its Act 129 Energy Efficiency and Conservation Plan and Expedited Approval of Its Compact Fluorescent Lamp Program, Docket No. M-2009-2093215;
- c. Petition of PECO Energy Company for Approval of its Default Service Program and Rate Mitigation Plan, Docket No. P-2008-2062739;
- d. Petition of PECO Energy Company for Approval of its Market Rate Transition Energy Efficiency Package, Docket No. P-2008-2062740;
- e. Petition of PECO Energy Company for Approval of its Market Rate Transition Phase-In Program, Docket No. P-2008-2062741; and
- f. In the Matter of PECO Energy Company Universal Services Three-Year Plan 2007-2009 Submitted in Compliance with 52 Pa. Code § 54.74, Docket No. M-00061945.

6. Intervenors TURN and Action Alliance are represented by:

Thu B. Tran, Esquire
Robert W. Ballenger, Esquire
George D. Gould, Esquire
COMMUNITY LEGAL SERVICES, INC.

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7. The intervenors have interests in the impact of the proposed Default Service Plan on moderate and low income residential customers, particularly tenants and seniors. These interests are not adequately represented by other participants.

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,



Thu B. Tran, Esquire (Attorney ID: 83086)
Robert W. Ballenger, Esquire (Attorney ID: 93434)
George D. Gould, Esquire (Attorney ID: 12549)

Attorneys for TURN, et al.

COMMUNITY LEGAL SERVICES, INC.
1424 Chestnut Street
Philadelphia, PA 19102
(215) 981-3777

February 13, 2012

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: February 10, 2012



Title: Executive Director, TURN

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of PECO Energy Company for approval of
its Default Service Program

Docket No. P-2012-2283641

CERTIFICATE OF SERVICE

I hereby certify that I have this day served copies of the **Petition to Intervene of Tenant Union Representative Network and Action Alliance of Senior Citizens of Greater Philadelphia**, as set forth below in accordance with the requirements of 52 Pa. Code § 1.54:

VIA E-MAIL & FIRST-CLASS MAIL (as indicated below)

Dennis J. Buckley
Administrative Law Judge
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Harrisburg PA 17105-3265
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Respectfully submitted,



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