



May 31, 2012

KENNETH L. MICKENS, ESQUIRE LLC
LEGAL CONSULTING

VIA HAND DELIVERY

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17105-3265

**Re: Petition of PPL Electric Utilities Corporation
For Approval of a Default Service and Procurement Plan
Docket No. P-2012-2302074 - Petition to Intervene
of the Sustainable Energy Fund of Central Eastern
Pennsylvania**

Dear Secretary Chiavetta:

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. I have also enclosed the Affidavit of Jennifer Hopkins, the President of SEF. Please contact me if you have any questions.

Sincerely,

Kenneth L. Mickens, Esquire
Attorney for the Sustainable
Energy Fund of Central Eastern
Pennsylvania

KLM/bls
Certificate of Service
Enclosures

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**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**Petition of PPL Electric Utilities :
Corporation for Approval of a : Docket No. P-2012-2302074
Default Service and Procurement :
Plan**

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

TO THE PENNSYLVANIA PUBLIC UTILITY COMMISSION:

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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 May 1, 2012, PPL Electric Utilities Corporation (“PPL Electric” or “Company”) filed with the Pennsylvania Public Utility Commission (“Commission”) a Petition for Approval of a Default Service Program and Procurement Plan (“Petition”), its second Default Service Program and Procurement Plan (“DSP II Program”) to establish the terms and conditions under which PPL Electric will acquire and supply Default

Service or provider of last resort service (“Default Service”), from June 1, 2013 through May 31, 2015 (the “DSP II Program Period”). The DSP II Program consists of a proposal for competitive procurement of Default Service supply and related Alternative Energy Credits during the DSP II Program Period; an implementation plan; a proposed rate design, including a Time-of-Use (“TOU”) rate for Default Service during the DSP II Program Period; an explanation of Regional Transmission Organization compliance and consistency; and, a contingency plan for the DSP II Program. PPL Electric Petition, p. 1.

2. PPL Electric requests that the Commission issue an order approving the DSP II Program within nine (9) months from the date of this filing or no later than February 1, 2013, to provide sufficient time to implement procurement under the DSP II Program. PPL Electric Petition, p. 11.

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 and invest in energy efficiency, energy conservation, renewable energy and energy education in order to provide opportunities and benefits for electric

ratepayers.

4. SEF's address is as follows:

The Sustainable Energy Fund of Central Eastern Pennsylvania
1005 Brookside Road
Allentown, PA 18106

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. THE ISSUES PRESENTED IN THIS FILING

6. A preliminary review of this filing indicates that the Company has proposed several changes that concern SEF:

- (a) Time of use pricing is designed to reflect time-based market fluctuations in electric generation rates. Evidence demonstrates that by passing market-based pricing signals through to end users, the economic difference between on-peak and off-peak periods reduces the variance in demand on electric grid resources and leads to more economically efficient resource utilization. However, certain of the proposals in PPL Electric's DSP II Program appear to threaten to change the originally identified intent of TOU rates in a way that would negatively impact ratepayers;

(b) PPL Electric's proposal to eliminate the Green Power Program and its separate proposal to procure AECs from the AEPS broker market are significant changes that merit careful review by the Commission; and,

(c) SEF is concerned about the impact of PPL Electric's proposed non-bypassable Competitive Transition Rider on shopping customers.

III. SEF's INTEREST IN THE PROCEEDING

7. 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 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.

8. SEF's mission includes a focus upon reductions in consumption and demand for the non-renewable, non-sustainable production of electricity and the most efficient use of energy within the PPL Electric service territory. As such, this mission coincides with the Company's stated efforts in this proceeding to continue compliance with the requirements of Act 129.

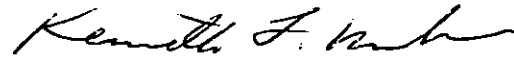
9. Accordingly, SEF's intervention is necessary to ensure the development of a complete record on the reasonableness of PPL Electric's proposals. SEF has a unique perspective - in keeping with its mission to promote and invest in energy efficiency, energy conservation, renewable energy and energy education that provide opportunities and benefits for 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.

10. Moreover, SEF has experience and expertise in matters of energy efficiency, energy conservation and consumer education such that its participation in this proceeding would benefit the record.

11. 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.

PA Attorney I.D. #31255

316 Yorkshire Drive

Harrisburg, PA 17111

E-Mail: kmickens11@verizon.net

Telephone: (717) 343-3338

FAX: (717) 657-0938

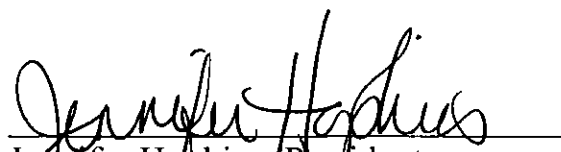
Attorney for The Sustainable Energy
Fund of Central Eastern Pennsylvania

DATED: May 31, 2012

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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: May 30, 2012

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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):

Michael W. Hassell, Esquire
Post & Schell
17 North Second Street, 12th Floor
Harrisburg, PA 17101-1601

Paul E. Russell, Esquire
PPL Services Corporation
Two North Ninth Street
Allentown, PA 18106

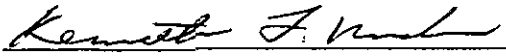
David MacGregor, Esquire
Post & Schell
Four Penn Center
1600 JFK Boulevard
Philadelphia, PA 19103

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

Johnnie E. Simms, Esquire
Office of Trial Staff
Pennsylvania Public Utility Commission
P.O. Box 3265
Harrisburg, PA 17105-3265

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Steven Gray, Esquire
Office of Small Business Advocate
Suite 1102 Commerce Building
300 North Second Street
Harrisburg, PA 17101


Kenneth L. Mickens, Esquire

Dated: May 31, 2012

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