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August 30, 2012

BY HAND DELIVERY

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor (filing room)
PO Box 3265
Harrisburg, PA 17105-3265

P-2012-232036A

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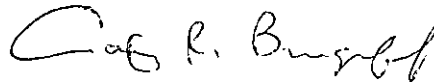
RE: Energy Efficiency and Conservation Program; Docket Nos. ~~M-2012-22894~~ LL and ~~M-2008-2069887~~; **PETITION TO INTERVENE OF THE SUSTAINABLE ENERGY FUND OF CENTRAL EASTERN PENNSYLVANIA**

Dear Secretary Chiavetta:

Enclosed please find an original and three (3) copies of the Sustainable Energy Fund of Central Eastern Pennsylvania's Petition to Intervene in the above-captioned proceeding. Copies have been served on the parties pursuant to the Certificate of Service.

If you have any questions regarding this filing, please do not hesitate to contact me.

Very truly yours,



Craig R. Burgraff
Counsel for Sustainable Energy Fund
of Central Eastern Pennsylvania

CRB/alh
Enclosure
cc: Per Certificate of Service

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Energy Efficiency and
Conservation Program

:
:
:

Docket Nos. M-2012-2289411
M-2008-2069887

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

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The Sustainable Energy Fund of Central Eastern Pennsylvania (“SEF”), by and through its attorneys, Hawke McKeon & Sniscak LLP, 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 states as follows:

I. BACKGROUND

1. This proceeding involves PPL’s Electric Utilities Corporation’s (“PPL”) filing of the Petition of PPL Electric Utilities Corporation for an Evidentiary Hearing in the above-reference proceeding (“PPL Petition”). The PPL Petition requests the Pennsylvania Public Utility Commission (“Commission”) to establish an evidentiary hearing regarding the consumption reduction targets established by the Commission in its August 3, 2012 Implementation Order at these dockets.¹ In particular, PPL requests that the Commission establish an evidentiary hearing concerning the 2.1% Act 129 Phase II three-year energy efficiency consumption reduction compliance target tentatively adopted for PPL by the

¹ Energy Efficiency and Conservation Program Implementation Order, Docket Nos. M-2012-2289411 and M-2008-2069887 (August 3, 2012)(“Implementation Order”).

Commission.² The Commission determined that Electric Distribution Company (“EDC”) consumption reduction targets will become final unless an EDC petitioned the Commission for an evidentiary hearing by August 20, 2012 expressing its desire to contest the facts the Commission relied upon in adopting the consumption reduction target.³ PPL filed the PPL Petition on August 20, 2012.

2. The PPL Petition essentially requests that the Commission allow PPL to challenge subsequent modifications to the Technical Reference Manual (“TRM”) during Phase II and allow PPL to request modifications to its Phase II targets.

3. The Implementation Order provides that petitions for intervention regarding an EDC’s request for an evidentiary hearing on its specific consumption reduction target are to be filed within ten (10) days.

II. SEF’s INTEREST IN THIS PROCEEDING

4. SEF is a Pennsylvania corporation established upon the conclusion of PPL’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, renewable energy and energy education that provide opportunities and benefits for PPL ratepayers, including low-income ratepayers.

5. SEF’s address is as follows:

The Sustainable Energy Fund of Central Eastern Pennsylvania
1005 Brookside Road, Suite 210
Allentown, PA 18106

6. The name, address, and telephone number of SEF’s attorney is:

Craig R. Burgraff

² Implementation Order at 24.

³ *Id.* at 31.

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7. As noted above, SEF's mission is to promote and invest in energy efficiency, renewable energy and energy education that provides opportunities and benefits for PPL ratepayers. 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.

8. SEF's mission, in large part, is focused on reductions in consumption and demand for electricity within the PPL service territory and for purposes of this proceeding that mission coincides with the goals of Act 129.⁴

9. Accordingly, SEF's intervention is necessary to ensure the development of a complete record on the reasonableness of the Commission's Phase II consumption reduction target for PPL. SEF has a unique perspective that cannot be adequately represented by any other party to this proceeding, which is in the public interest and which should be considered by the Commission.

10. SEF intervened and participated as a party in PPL's initial Energy Efficiency and Conservation Plan ("EE&C") filing at Docket No. M-2009-2093216, and has participated in PPL's subsequent filings to amend its EE&C Plan. In addition, SEF has filed Reply Comments in M-2008-2069887 and filed Comments in Docket No. M-2012-2289411. SEF has also actively

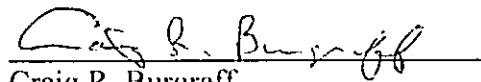
⁴ 2008, October 15, P.L. 1592, No. 129 ("Act 129")

participated in working groups and stakeholder meetings associated with the implementation of Act 129.

11. SEF intends to actively participate in this proceeding.

WHEREFORE, 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,



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DATED: August 30, 2012

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CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the foregoing document upon the parties, listed below, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a party).

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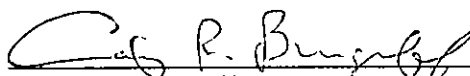
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