

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

ACT 129 ENERGY EFFICIENCY AND CONSERVATION PROGRAM : DOCKET NOS. P-2012-2320450  
: ~~M-2012-2289411~~  
: ~~M-2008-2069887~~

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**PETITION TO INTERVENE**

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AUG 30 2012

PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

Through counsel, Citizens for Pennsylvania's Future (PennFuture), hereby Petitions to Intervene in response to the "Petition of PECO Energy Company for an Evidentiary Hearing," (hereinafter "PECO") "Petition of Metropolitan Edison Company, Pennsylvania Electric Company, Pennsylvania Power Company and West Penn Power Company for an Evidentiary Hearing on the Energy Efficiency Benchmarks Established for the Period June 1, 2013 through May 31, 2016," "Petition for Reconsideration and Clarification of Metropolitan Edison Company, Pennsylvania Electric Company, Pennsylvania Power Company and West Penn Power Company," (hereinafter collectively referred to as "FirstEnergy") "Petition of PPL Electric Utilities Corporation for an Evidentiary Hearing" and "Petition of PPL Electric Utilities Corporation for Reconsideration" (hereinafter "PPL"). Petitioner requests that the Pennsylvania Public Utility Commission (Commission) grant Petitioner status as Intervenor pursuant to 52 Pa. Code §§5.73-75 in the proceedings of the Commission concerning the Act 129 Implementation Order entered August 3, 2012.

Petitioner provides the following in support of its Petition to Intervene:

1. Petitioner is Citizens for Pennsylvania's Future (PennFuture), a Pennsylvania nonprofit corporation with offices in Philadelphia, West Chester, Wilkes-Barre, Harrisburg, and Pittsburgh, Pennsylvania ([www.pennfuture.org](http://www.pennfuture.org)). PennFuture's principal business location is 610 North Third Street, Harrisburg, PA 17101, tel. (717) 214-7920. PennFuture has members who live in the PECO, PPL and FirstEnergy service territories, are customers of PECO, PPL and FirstEnergy and/or receive service from PECO, PPL and FirstEnergy. PennFuture engages in policy development, public education, litigation and other strategies to achieve its goals, including promoting clean energy and energy efficiency.

2. The name and address of counsel for Petitioner is:

Heather M. Langeland, Staff Attorney  
PennFuture  
425 Sixth Avenue, Suite 2770  
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3. The Petitioners, on behalf of their members and the public interest, have an interest in ensuring that energy efficiency and conservation programs are implemented to the fullest extent allowed by law and achieve the highest possible energy savings, in order to protect public health, preserve the environment, reduce energy prices, and maintain grid reliability. Petitioner's members are directly and personally affected by the Proceedings because they reasonably may be expected to affect the safety, reliability, cleanliness and affordability of their public utility service. Petitioner's members depend on electric distribution service from PECO, PPL and FirstEnergy to meet basic

necessities of life and risk health and financial consequences if service is not provided in a safe, reliable, clean, and affordable manner.

4. Specifically, this action directly impacts PennFuture and its members including but not limited to the following:

a. Joy Bergey resides at 100 South College Avenue, Flourtown, PA, 19031, where she is a customer receiving distribution service from PECO.

b. Mark and Julianne Noonan reside at 55 Valley Brook Road, Boyertown, PA 19512 where they receive distribution services from FirstEnergy.

c. PennFuture owns and uses offices at 610 North Third Street, which receives electric service from PPL. PennFuture also has members who live in the PPL Electric service territory, are customers of PPL Electric, and receive electrical service from PPL Electric.

5. Petitioner has a right and interest in assuring that safe, reliable, clean and affordable public utility service, and participation in these Proceedings is an appropriate way to protect these rights and interests. Petitioner may intervene in this proceeding pursuant to 52 Pa. Code §§ 5.73-75.

6. PennFuture has participated in the FirstEnergy, PECO and PPL Act 129 stakeholder input processes, and submitted comments to the Commission in the matter captioned *Energy Efficiency and Conservation Program*, Docket Nos. M-2012-2289411, M-2008-2069887.

7. Petitioners have interests in and perspectives on issues in this proceeding that are not adequately represented by other parties of record.

8. Petitioner intends to present evidence and witnesses in support of the fact that EDCs will be able to meet the goals set forth in the Commission's Implementation Order dated August 3, 2012.

9. To the extent the Commission deviates from its Implementation Order and allows evidence to be received addressing arguments raised by PECO, PPL and/or FirstEnergy that are outside the consumption reduction requirement, Petitioner intends to present evidence in support of the Commission's Implementation Order.

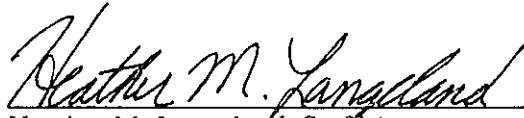
10. Petitioner's position regarding demand response programs differs from PECO's stated position and it will be prepared to submit evidence supporting the Petitioner's position should the Commission deviate from the Implementation Order and receive evidence as to this issue.

11. Petitioners reserve the right to raise other issues as necessary and appropriate during the course of the proceeding and to respond to issues raised by other parties.

12. Pursuant to the Implementation Order, Intervenor's must file must be filed within 10 days of an EDC filing a request for a hearing. Requests for a hearing were filed on August 20, 2012, making this Petition timely.

For the foregoing reasons, Petitioner requests that the Commission grant this Petition and confer status as Intervenor in this Proceeding.

Respectfully submitted,



Heather M. Langeland, Staff Attorney

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Counsel for Petitioner PennFuture

DATED: August 30, 2012

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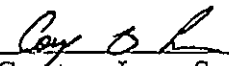
AUG 30 2012

PA PUBLIC UTILITY COMMISSION  
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**VERIFICATION**

I, Courtney Lane, am a Senior Energy Policy Analyst for Citizens for Pennsylvania's Future's Center for Energy, Enterprise and the Environment. I hereby state facts set forth herein are true and correct to the best of my knowledge, information and belief and that I expect to be able to prove the same at a hearing held in this matter. I have registered to use the Public Utility Commission's electronic filing system in accordance with the registration instructions available on the Commission's web site and have obtained a user ID and password. I understand that the statements made herein are subject to the penalties of 18 Pa.C.S. Section 4904 concerning unsworn falsification to authorities.

DATE: August 30, 2012

  
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Courtney Lane, Senior Energy Policy Analyst  
PennFuture

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PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

**CERTIFICATE OF SERVICE**

I, Heather M. Langeland, do hereby certify that a true and accurate copy of the foregoing PETITION TO INTERVENE was served upon the following this 30<sup>th</sup> day of August, 2012, by depositing a copy of the same in the United States mail, postage prepaid and addressed to:

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