

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

ACT 129 ENERGY EFFICIENCY AND CONSERVATION PROGRAM : DOCKET NOS. P-2012-2320468
: ~~M-2012-2289411~~
: ~~M-2008-2069887~~

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AUG 30 2012

PETITION TO INTERVENE

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). 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
Pittsburgh, PA 15219
Phone: 412-258-6684
Fax: 412-258-6685
langeland@pennfuture.org

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.

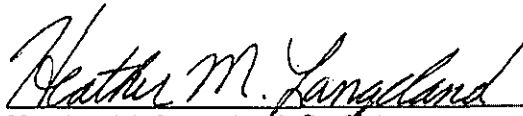
10. Petitioner's position regarding demand response programs differs from PECO's stated position and it will be prepared to submit evidence supporting the Petitioner's position should the Commission deviate from the Implementation Order and receive evidence as to this issue.

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

Pa. Bar Id. No. 207387

425 Sixth Avenue, Suite 2770

Pittsburgh, PA 15219

Phone: 412-258-6684

Fax: 412-258-6685

langeland@pennfuture.org

Counsel for Petitioner PennFuture

DATED: August 30, 2012

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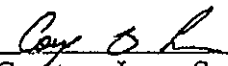
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PA PUBLIC UTILITY COMMISSION
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VERIFICATION

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



Courtney Lane, Senior Energy Policy Analyst
PennFuture

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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 30th day of August, 2012, by depositing a copy of the same in the United States mail, postage prepaid and addressed to:

Rosemary Chiavatta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor
Harrisburg, PA 17120

David T. Evrard, Esquire
Tanya J. McCloskey, Esquire
Office of Consumer Advocate
555 Walnut Street
Harrisburg, PA 17101-1923

Sharon E. Webb, Esquire
Office of Small Business Advocate
1102 Commerce Building
300 North Second Street
Harrisburg, PA 17101

Charles Daniel Shields, Esquire
Adeolu A. Bakare, Esquire
Bureau of Investigation and Enforcement
Pennsylvania Public Utility Commission
P.O. Box 3265 Harrisburg, PA 17105-3265

American Council for an Energy
Efficient Economy
529 14th Street N.W., Suite 600
Washington, D.C. 20045-1000

Gene Brady, Chairman
Pennsylvania Weatherization Providers
Task Force
PO Box 991
Wilkes-Barre, PA 18703

Timothy J. Seelaus, President
EMC2 Development Company, Inc.

6011 University Blvd., Suite 400
Ellicott City, MD 21043

Michael Bodaken, President
National Housing Trust
1101 30th Street, N.W., Suite 400
Washington, D.C. 20007

National Energy Solutions, Inc.
245 Lower Morrisville Road
Fallsington, PA 19054

Tri-State Light & Energy
2233 Manor Avenue
Upper Darby, PA 19082

Stacy Richards, Director
SEDA Council of Governments
Energy Resource Center
201 Furnace Road
Lewisburg, PA 17837

Scott J. Schwarz, Esquire
City of Philadelphia One Parkway
1515 Arch Street
Philadelphia, PA 19102-1595

Theron Colbert, PE, MSEE
KVAR Energy Savings, Inc.
741 Orange Avenue
Daytona Beach, FL 32114

Camille "Bud" George
PA House of Representatives
Room 38EW
Harrisburg, PA 17120-2020

Harry S. Geller, Esquire
Patrick M. Cicero, Esquire
Pennsylvania Utility Law Project
118 Locust Street
Harrisburg, PA 17101-1414

Zachary M. Fabish, Esquire
Sierra Club
50 F. Street, NW, 8th Floor

Washington, DC 20001

Joseph Otis Minott, Esquire
Clean Air Council
135 S. 19th Street, Suite 300
Philadelphia, PA 19103.

David Masur, Executive Director
PennEnvironment
1420 Walnut Street, Suite 650
Philadelphia, PA 19102

Luis G. Martinez, Esquire
Natural Resources Defense Council
40 West 20th Street
New York, NY 10011

Cherie Eichholz
Physicians for Social Responsibility
Philadelphia Chapter
704 North 23rd Street
Philadelphia, PA 19130

Mark C. Morrow, Esquire
Chief Regulatory Counsel
UGI Utilities, Inc.
460 North Gulph Road
King of Prussia, PA 19406

Jim Kapsis
Opower, Inc.
1515 N. Courthouse Road
Arlington, VA 22201

Tanya J. McCloskey Esquire
Senior Assistant Consumer Advocate
Office of Consumer Advocate
555 Walnut Street
Forum Place, 5th Floor
Harrisburg, PA 17101-1923

Josh Craft, Esquire
Northeast Energy Efficiency Partnerships
91 Hartwell Avenue
Lexington, MA 02421

Mark Schwartz, Esquire
Regional Housing Legal Services
2 S. Easton Road
Glenside, PA 19038

Theodore S. Robinson, Esquire
Citizen Power
2121 Murray Avenue
Pittsburgh, PA 15217

Roger E. Clark, Esquire
The Reinvestment Fund
1700 Market Street, 19th Floor
Philadelphia, PA 19103

Jon Thomsen, Executive Vice President
Ecova, Inc.
309 SW 6th Avenue, #1000
Portland, OR 97204

Teresa K. Schmittberger
McNees Wallace & Nurick, LLC
100 Pine Street
P.O. Box 1166
Harrisburg, PA 17108-1166

Tishekia Williams
Sr. Counsel, Regulatory
Duquesne Light Company
411 Seventh Avenue, 16th Floor
Pittsburgh, PA 15219

Donna M.J. Clark, Esquire
Vice President and General Counsel
The Energy Association of Pennsylvania
800 North Third Street
Suite 205
Harrisburg, PA 17102

Scott H. DeBroff, Esquire
Rhoads & Sinon LLP
One South Market Square
12th Floor
PO Box 1146
Harrisburg, PA 17108-1146