

BURKE VULLO REILLY ROBERTS

ATTORNEYS AT LAW

1460 Wyoming Avenue
Forty Fort, PA 18704
Phone (570) 288-6441 ♦ Fax (570) 288-4598

*Formerly Burke & Burke
Thomas F. Burke, Sr. (1932-1972)*

JOSEPH L. VULLO
jlvullo@bvrrlaw.com

www.bvrrlaw.com

August 29, 2012

VIA FEDERAL EXPRESS

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

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AUG 29 2012

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

P-2012-2320450

RE: Energy Efficiency and Conservation Program
In Re: Petition of Metropolitan Edison Company et al.
for Reconsideration/Evidentiary Hearing
Docket Nos: ~~M-2012-2289411~~
M-2008-2069887

Dear Secretary Chiavetta:

Enclosed please find an original and three copies of CAPP's Petition to Intervene for filing in the above-referenced matter. As indicated in the attached Certificate of Service all parties are being served.

If you need anything further from me in order to effect filing please advise.

Respectfully yours,


JOSEPH L. VULLO

JLV/lm
encls.

cc: Per Certificate of Service

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BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

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AUG 29 2012

Energy Efficiency and Conservation Program

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

**In Re: Petition of Metropolitan Edison Company et al. for
Reconsideration/Evidentiary Hearing**

**Docket Nos: M-2012-2289411
M-2008-2069887**

**COMMUNITY ACTION ASSOCIATION OF PENNSYLVANIA'S
PETITION TO INTERVENE**

NOW COMES, the Community Action Association of Pennsylvania (CAAP), by and through counsel, Joseph L. Vullo, Esquire, and petitions to intervene in the above-captioned matter, averring as follows:

1. The Petitioner, Community Action Association of Pennsylvania, is a statewide association representing Pennsylvania's community action agencies that provide anti-poverty planning and community development activities for low income communities and services to individuals and families.

2. For more than 25 years, one of CAAP's primary missions has been to represent the energy interests of low income citizens in proceedings before the Pennsylvania Public Utility Commission and as such, CAAP has a direct and substantial interest in this proceeding that cannot be adequately represented by any other party.

3. CAAP is comprised of forty-three member agencies including agencies in the service areas of Metropolitan Edison Company, Pennsylvania Electric Company, Pennsylvania Power Company and West Penn Power Company.

4. CAAP seeks permission to intervene in the recently filed Petition for Reconsideration and Petition for Evidentiary Hearing filed by Metropolitan Edison Company et al. in the above-captioned docket number.

5. The sole purpose of CAAP intervening in this proceeding is to monitor this proceeding for its impact on the companies' low income customers. CAAP does not anticipate presenting testimony or argument in this case but reserves the right to do so.

6. CAAP has intervened and has been granted intervention and active party status in prior rate and/or acquisition cases before the Pennsylvania Public Utility Commission.

7. CAAP's participation as an active party in this proceeding is required to protect its substantial interests and the substantial interests of the low income citizens it represents in ensuring that clients of its member agencies and the low income customers of the companies access to Act 129 measures. Accordingly, CAAP's participation in this proceeding will serve the public interest.

9. Because CAAP represents low income citizens in the Company's service areas, the interests of its clients are not protected by any other party to this action.

REQUEST FOR RELIEF

WHEREFORE, CAAP respectfully requests that the Commission:

1. Receive for filing and docket this Petition to Intervene and order that CAAP be an active party to such proceedings and be placed on all services lists.

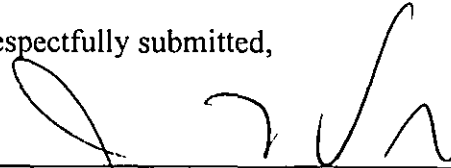
2. Order that the following individuals be designated as CAAP's recipients for service:

Joseph L. Vullo, Esquire
1460 Wyoming Avenue
Forty Fort, PA 18704
Phone: (570) 288-6441

Fax: (570) 288-4598
e-mail: jlvullo@aol.com
Counsel for CAAP

3. Order that each party to the proceedings provide CAAP's designated recipient with copies of all papers filed.
4. Grant such other relief as the Commission may deem necessary and proper.

Respectfully submitted,



JOSEPH L. VULLO, ESQUIRE
I.D. No. 41279
1460 Wyoming Avenue
Forty Fort, PA 18704
(570) 288-6441
e-mail: jlvullo@aol.com
Attorney for Community Action Association
of Pennsylvania

VERIFICATION

I, SUSAN A. MOORE, Chief Executive Officer of Community Action Association of Pennsylvania, hereby verify that I am authorized to execute this Verification and that the facts set forth in the foregoing Petition to Intervene are true and correct to the best of my knowledge, information and belief.

COMMUNITY ACTION ASSOCIATION
OF PENNSYLVANIA

BY: 
SUSAN A. MOORE, Chief Executive Officer

Dated: 8-28-12

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SECRETARY'S BUREAU

CERTIFICATE OF SERVICE

AND NOW, this 29th day of August, 2012, I, Joseph L. Vullo, Esquire, counsel for CAAP, hereby certify that I served the attached Petition to Intervene on the following by United States First

Class Mail:

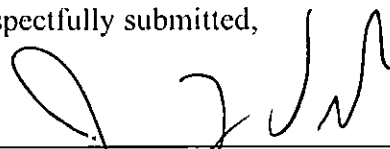
Kathy J. Kolich
FirstEnergy Service Company
76 S. Main Street
Akron, OH 44308

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

Charles Daniel Shields, Esquire
Adeolu A. Bakare, Esquire
Office of Trial Staff
Pennsylvania Public Utility Commission
P.O. Box 3265
Harrisburg, PA 17105-3265

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

Respectfully submitted,



JOSEPH L. VULLO, ESQUIRE
Bar ID #41279
Burke Vullo Reilly Roberts
1460 Wyoming Avenue
Forty Fort, PA 18704
(570) 288-6441

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AUG 29 2012

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

From: (570) 288-6441
Joseph L. Vullo, Esquire
BURKE VULLO REILLY ROBERTS
1460 Wyoming Avenue

Origin ID: HZLA



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Forty Fort, PA 18704

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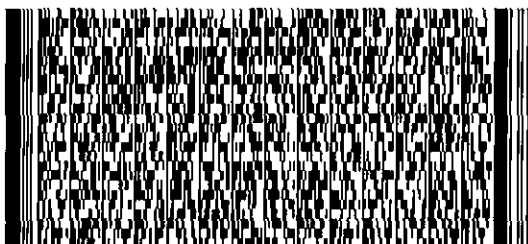


SHIP TO: (000) 000-0000 **BILL SENDER**
Rosemary Chiavetta, Secretary
PA Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor
HARRISBURG, PA 17120

Ref # VULLO
Invoice #
PO #
Dept #

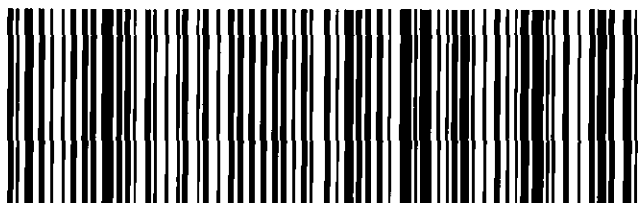
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