

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

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VIA FEDERAL EXPRESS

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

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

P-2012-2320334

RE: Energy Efficiency and Conservation Program
In Re: PECO Petition 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

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

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Energy Efficiency and Conservation Program

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

In Re: PECO Petition 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 PECO's service areas.

4. CAAP seeks permission to intervene in the recently filed Petition for Reconsideration and Petition for Evidentiary Hearing filed by PECO pursuant to the above-captioned docket number.

5. The sole purpose of CAAP intervening in this proceeding is to monitor this proceeding for its impact on PECO'S 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 PECO's low income customers have 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.

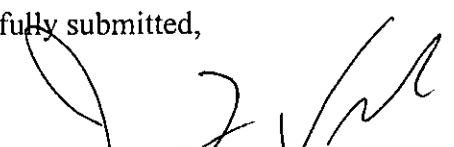
2. Order that the following individuals be designated as CAAP's recipients for service:

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

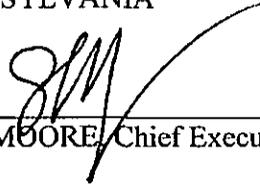
e-mail: jlvullo@aol.com

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:

Romulo L. Diaz, Jr. Esquire
Anthony E. Gay, Esquire
Jack R Grafinkle, Esquire
PECO Energy Company
2301 Market Street
P.O. Box 8699
Philadelphia, PA 19101-8699

Kenneth M. Kulak, Esquire
Anthony C. DeCusatis, Esquire
Brooke E. Leach
Morgan, Lewis & Bockius LLP
1701 Market Street
Philadelphia, PA 19103-29241

Johnnie E. Simms
Bureau of Investigation and Enforcement
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
P.O. Box 3265
400 North Street, 2nd Floor West
Harrisburg, PA 17105-3265

Tanya J. McCloskey
Jennedy S. Johnson
Office of Consumer Advocate
555 Walnut Street
5th Floor, Forum Place
Harrisburg, PA 17101-1923

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

Kriss Brown
Pennsylvania Public Utility Commission
Law Bureau
P.O. Box 3265
Harrisburg, PA 17105

Lawrence Swanson
Action Housing
425 Sixth Avenue, Suite 950
Pittsburgh, PA 15219-1819

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

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

Ronell Guy
Northside Coalition for Fair Housing
P.O. Box 100011
Pittsburgh, PA 15233

La'Tasha D. Mayes
New Voices Pennsylvania
Women of Color for Reproductive Justice
The Beatty Building
5907 Penn Avenue, Suite 340
Pittsburgh, PA 15206

Kristie Weiland Stagno
Just Harvest: A Center for Action
Against Hunger
16 Terminal Way
Pittsburgh, PA 15219

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Thu B. Tran
Robert Ballenger
Josie Pickens
Community Legal Services
1424 Chestnut Street
Philadelphia, PA 19102-2505

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

Scott Schwartz
City of Philadelphia
Law Department
One Parkway
1515 Arch Street
Philadelphia, PA 19102-1595

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

Maryellen Deckard
Action United
846 North Broad Street, 2nd Floor
Philadelphia, PA 19130

Alethea Sims
The Coalition of Organized Residents
of East Liberty
211 North Whitfield Street, Suite 210
Pittsburgh, PA 15206

Swarthmore Cooperative
341 Dartmouth Avenue
Swarthmore, PA 19081

Timothy J. Seelaus
EMC2 Development Company, Inc.
6011 University Boulevard, Suite 400
Ellicott City, MD 21043

Jon Thomsen
Ecova, Inc.
309 S.W. 6th Avenue, #1000
Portland, OR 97204

Terrance J. Fitzpatrick
Donna M.J. Clark
Energy Association of Pennsylvania
800 North Third Street, Suite 205
Harrisburg, PA 17102

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

Steve Etsler
AK Steel
9227 Centre Pointe Drive
West Chester, OH 45069

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

Aaron Breidenbaugh
Enernoc, Inc.
101 Federal Street, Suite 1100
Boston, MA 02110

Liz Robinson
Keystone Energy Efficiency Alliance
1924 Arch Street
Philadelphia, PA 19103

Zachary M. Fabish
Sierra Club Environmental Law Program
50 F Street, N. W., 8th Floor
Washington, DC 20001

Scott H. DeBroff
Alicia R. Duke
Rhoads & Sinon LLP
One South Market Square, 12th Floor
P.O. Box 1146
Harrisburg, PA 17108-1146

Holly Rachel Smith
Holly Rachel Smith, PLLC
3803 Rectortown Road
Marshall, VA 20115

B. Marie Pieniasek
Energy Curtailment Specialists, Inc.
4455 Genesee Street, Building 6
Buffalo, NY 14225

George Jugovic, Jr.
Citizens for Pennsylvania's Future
425 6th Avenue, Suite 2770
Pittsburgh, PA 15219

Frank Lacey
Matthew H. Smith Converge, Inc.
511 Schoolhouse Road, Suite 200
Kennett Square, PA 19348

Iain A. Campbell
Johnson Controls, Inc. & EnergyConnect
507 East Michigan Street
Milwaukee, WI 53201-0423

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

Sam Wolfe
Viridity Energy, Inc.
1801 Market Street
Philadelphia, PA 19103

Rachel Filippini
Group Against Smog and Pollution
5135 Penn Avenue
Pittsburgh, PA 15224

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

Miriam Horn
Environmental Defense Fund
257 Park Avenue South
New York, NY 10010

Theron "TC" Colbert
KVAR Energy Savings, Inc.
741 Orange Avenue
Daytona Beach, FL 32114

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

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

Jim Kapsis
Opower
1515 North Courthouse Road, 8th Floor
Arlington, VA 22201

Paul E. Russell
PPL Services Corporation
Office of General Counsel
Two North Ninth Street
Allentown, PA 18106

Dan Delurey
Association for Demand Response
and Smartgrid
1301 Connecticut Avenue, N.W., Suite 350
Washington, DC 20036

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

Josh McNeil
Conservation Voters of PA
P.O. Box 2125
Philadelphia, PA 19147

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

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

David L. Evans
Pennsylvania Housing Finance Agency
P.O. Box 8029
Harrisburg, PA 17105-8029

Courtney Lane
Citizens for Pennsylvania's Future
1500 Walnut Street, Suite 502
Philadelphia, PA 19102

David B. MacGregor
Post & Schell, P.C.
Four Penn Center
1600 John F. Kennedy Boulevard
Philadelphia, PA 19103

Mark Schwartz
Rachel Blake
Regional Housing Legal Services
2 South Easton Road
Glenside, PA 19038

Camille "Bud" George
State Representative
House of Representatives
Room 38B, Main Capitol Building
(East Wing)
P.O. Box 202074
Harrisburg, PA 17120

Gene Brady
Pennsylvania Weatherization Providers
Task Force
P.O. Box 991
Wilkes-Barre, PA 18703

Alan Rhode
Tri-State Light & Energy, Inc.
2233 Manor Avenue
Upper Darby, PA 19082

Abraham Amoros
Laborers International Union
of North America
905 16th Street, N.W.
Washington, DC 20006

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

Craig R. Burgraff
Hawke, McKeon & Sniscak LLP
100 North Tenth Street
Harrisburg, PA 17101

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

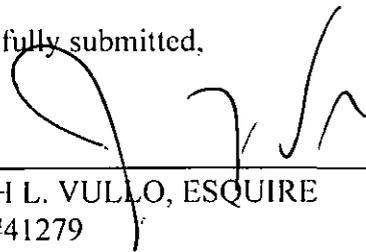
Mark C. Morrow
UGI Utilities, Inc.
460 North Gulph Road
King of Prussia, PA 19406

Lindsay Patterson
United Steelworkers
Five Gateway Center
Pittsburgh, PA 15222

Anthony M. Helfer
United Food and Commercial Workers
1775 K Street, N.W.
Washington, DC 20006

Kati Sipp
Service Employees International Union
1800 Massachusetts Avenue, N.W.
Washington, DC 20036

Respectfully submitted,



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

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

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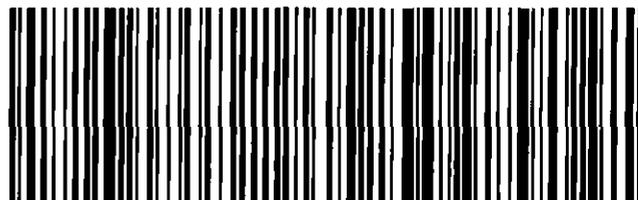
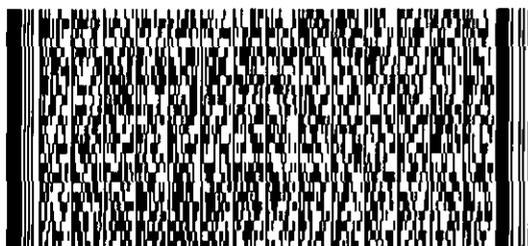
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