

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Duquesne Light Company – Petition :  
For Approval of Act 129 Phase II Energy : Docket No. M-2012-2334399  
Efficiency & Conservation Plan :

**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 Columbia Gas of Pennsylvania’s service areas. Specifically, the agencies listed in Exhibit A attached are members of CAAP and customers of Duquesne Light Company.

4. CAAP seeks permission to intervene in Duquesne Light Company’s Petition for Approval of Act 129 Phase II Energy Efficiency & Conservation Plan pursuant to the above-captioned docket number.

5. 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. Most

recently, CAAP was granted intervenor status in the rate case recently filed by Peoples Natural Gas Company, LLC (Docket No. R-2012-2285985).

6. CAAP seeks permission to intervene in Duquesne Light Company's Petition for Approval of Act 129 Phase II Energy Efficiency & Conservation Plan to address in large part the portion of the Company's Plan that concerns low income customers. CAAP reserves the right to address other parts of the Company's Plan.

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 they receive the energy consumption benefits as required under Act 129. Accordingly, CAAP's participation in this proceeding will serve the public interest.

8. 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.

**POSITIONS**

9. CAAP reserves the right to address all portions of the Company's Plan but its main purpose is to address that portion of the Plan that addresses low income customers.

10. There is a substantial public interest in ensuring that low income customers receive the consumption reduction benefits as required under Act 129.

11. CAAP has been an active participant in EDCS' prior requests for rate increases and other proceedings filed with the PUC.

**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. Grant to CAAP active party status with right to participate in all proceedings relative to this matter.

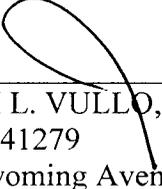
3. Order that the following individuals be designated as CAAP's recipients for service:

Joseph L. Vullo, Esquire  
1460 Wyoming Avenue  
Forty Fort, PA 18704  
Phone: (570) 288-6441  
Fax: (570) 288-4598  
e-mail: [jlvullo@aol.com](mailto:jlvullo@aol.com)  
Counsel for CAAP

4. Order that each party to the proceedings provide CAAP's designated recipient with copies of all papers filed.

5. 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](mailto:jlvullo@aol.com)  
Attorney for Community Action Association  
of Pennsylvania

**EXHIBIT A**

**COMMUNITY ACTION ASSOCIATION OF PENNSYLVANIA  
MEMBER AGENCIES**

Allegheny Co. Department of Human Services

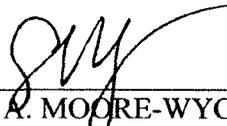
Community Services Program of Beaver County

**VERIFICATION**

I, SUSAN A. MOORE-WYCHULIS, 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-WYCHULIS  
Chief Executive Officer

Dated: \_\_\_\_\_

12/6/2012

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Duquesne Light Company – Petition :  
For Approval of Act 129 Phase II Energy : Docket No. M-2012-2334399  
Efficiency & Conservation Plan :

**CERTIFICATE OF SERVICE**

The undersigned certified that he served a copy of the foregoing Community Action Association of Pennsylvania's Petition to Intervene upon the following participants this 6<sup>th</sup> day of December, 2012, via first-class mail:

Tishekia E. Williams, Esquire  
Duquesne Light Company  
411 Seventh Avenue, 16<sup>th</sup> Floor  
Pittsburgh, PA 15219

Office of Consumer Advocate  
5<sup>th</sup> Floor Forum Place  
555 Walnut Street  
Harrisburg, PA 17101-1923

Andrew S. Tubbs, Esquire  
Post & Schell  
12<sup>th</sup> Floor  
17 North Second Street  
Harrisburg, PA 17101-1601

Office of Small Business Advocate  
300 North Second Street  
Suite 1102  
Harrisburg, PA 17101

Bureau of Investigation & Enforcement  
Pennsylvania Public Utility Commission  
P.O. Box 3265  
Commonwealth Keystone Building  
400 North Street, 3<sup>rd</sup> Floor  
Harrisburg, PA 17105-3265

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