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December 7, 2012

VIA HAND DELIVERY

Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street, 2<sup>nd</sup> Floor (filing room)  
PO Box 3265  
Harrisburg, PA 17105-3265

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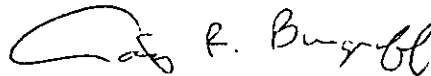
RE: Petition of PPL Electric Utilities Corporation for Approval of its Act 129 Phase II Energy Efficiency and Conservation Plan; Docket No. M-2012-2334388; **PETITION TO INTERVENE OF THE SUSTAINABLE ENERGY FUND OF CENTRAL EASTERN PENNSYLVANIA**

Dear Secretary Chiavetta:

Enclosed for filing with the Commission is an original Petition to Intervene of the Sustainable Energy Fund of Central Eastern Pennsylvania. This filing has been served in accordance with the attached Certificate of Service.

If you have any questions concerning this filing, please do not hesitate to contact my office.

Very truly yours,



Craig R. Burgraff  
*Counsel for The Sustainable Energy Fund of  
Central Eastern Pennsylvania*

CRB/jld/151961.1

Enclosures

cc: Administrative Law Judge Dennis J. Buckley (via email and via hand delivery)  
Per Certificate of Service

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MAILING ADDRESS: P.O. BOX 1778 HARRISBURG, PA 17105

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Petition of PPL Electric Utilities :  
Corporation for Approval of its Act 129 :  
Phase II Energy Efficiency and :  
Conservation Plan :

Docket No.: M-2012-2334388

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**PETITION TO INTERVENE  
OF THE SUSTAINABLE ENERGY FUND  
OF CENTRAL EASTERN PENNSYLVANIA**

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The Sustainable Energy Fund of Central Eastern Pennsylvania (“SEF”), by and through its attorneys, Hawke McKeon & Sniscak, LLP, files this Petition to Intervene in the above-captioned proceeding pursuant to 52 Pa. Code § 5.71, *et seq.* In support of its intervention, SEF states as follows:

**I. BACKGROUND**

1. This proceeding involves PPL Electric Utilities Corporation’s (“PPL”) November 15, 2012 filing of the Petition of PPL Electric Utilities Corporation for Approval of its Act 129 Phase II Energy Efficiency and Conservation Plan (“Phase II EE&C Plan”). The Phase II EE&C Plan was filed pursuant to the Public Utility Commission’s (“Commission”) August 3, 2012 Implementation Order<sup>1</sup> in which the Commission established the Phase II Energy Efficiency and Conservation Program, including the tentative adoption of specific consumption reduction targets for each subject Electric Distribution Company (“EDC”), including PPL.<sup>2</sup>

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<sup>1</sup> Energy Efficiency and Conservation Program Implementation Order, Docket Nos. M-2012-2289411 and M-2008-2069887 (August 3, 2012) (“Implementation Order”).

<sup>2</sup> These reduction targets become final for any covered EDC that did not petition the Commission for an evidentiary hearing by August 20, 2012. Implementation Order at 24, 30-32. PPL filed for an evidentiary hearing, but did not

2. SEF is a Pennsylvania corporation established upon the conclusion of PPL's Restructuring Proceeding and pursuant to the terms of the Joint Settlement of that proceeding approved by the Commission's August 27, 1998 Order at Docket No. R-00973954. SEF's mission is to promote and invest in energy efficiency, renewable energy and energy education that provide opportunities and benefits for PPL ratepayers, including low-income ratepayers.

3. SEF's address is as follows:

The Sustainable Energy Fund of Central Eastern Pennsylvania  
1005 Brookside Road, Suite 210  
Allentown, PA 18106

4. The name, address, and telephone number of SEF's attorney is:

Craig R. Burgraff  
PA Attorney I.D. No.: 16278  
Hawke McKeon & Sniscak, LLP  
100 North Tenth Street  
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## **II. SEF's INTEREST IN THIS PROCEEDING**

5. As noted above, SEF's mission is to promote and invest in energy efficiency, renewable energy and energy education that provides opportunities and benefits for PPL ratepayers. In furtherance of its mission, SEF is engaged in projects that emphasize renewable energy sources, such as solar and wind power development, clean energy technologies, energy conservation and efficiency, as well as energy education.

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challenge the 2.1% consumption reduction target established in the Implementation Order. The record from that proceeding has been certified to the Commission.

6. SEF's mission, in large part, is focused on reductions in consumption and demand for electricity within the PPL service territory and for purposes of this proceeding that mission coincides with the goals of Act 129.

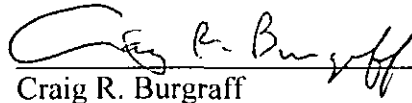
7. Accordingly, SEF's intervention is necessary to ensure the development of a complete record on the reasonableness of PPL's Phase II EE&C Plan proposals. SEF has a unique perspective in keeping with its mission to promote and invest in energy efficiencies, renewable energy and energy education that provide opportunities and benefits for PPL ratepayers, that cannot be adequately represented by any other party to this proceeding, which is in the public interest and which should be considered by the Commission.

8. SEF intervened and participated as a party in PPL's initial Energy Efficiency and Conservation Plan ("EE&C") filing at Docket No. M-2009-2093216, and has participated in PPL's subsequent filings to amend its EE&C Plan. In addition, SEF has filed Reply Comments in M-2008-2069887 and filed Comments in Docket No. M-2012-2289411. SEF recently participated in PPL's Petition for an Evidentiary Hearing regarding the Implementation Order. SEF has also actively participated in working groups and stakeholder meetings associated with the implementation of Act 129.

9. SEF intends to actively participate in this proceeding.

WHEREFORE, the Sustainable Energy Fund of Central Eastern Pennsylvania requests that the Pennsylvania Public Utility Commission grant its Petition to Intervene in the above-captioned proceeding and grant it full party status.

Respectfully submitted,



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*Counsel for The Sustainable Energy Fund of  
Central Eastern Pennsylvania*

Dated: December 7, 2012

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**CERTIFICATE OF SERVICE**

I hereby certify that I have this day served a true copy of the foregoing document upon the parties, listed below, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a party).

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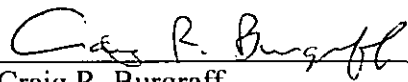
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Dated: December 7, 2012

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