



KENNETH L. MICKENS, ESQUIRE LLC  
LEGAL CONSULTING

May 14, 2014

Rosemary Chiavetta  
Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street  
Harrisburg, PA 17105-3265

Re: Petition of PPL Electric Utilities Corporation  
For Approval of a Default Service Program and Procurement Plan for  
the Period June 1, 2015 through May 31, 2017 – Sustainable Energy  
Fund Petition to Intervene - Docket No. P-2014-2417907 – E-Filing

Dear Secretary Chiavetta:

Enclosed please find the Sustainable Energy Fund's Petition to Intervene in  
the above referenced proceeding. Parties have been served in accordance with  
the attached Certificate of Service.

Sincerely,

A handwritten signature in cursive script, appearing to read "Kenneth L. Mickens".

Kenneth L. Mickens, Esq.  
Attorney for the Sustainable  
Energy Fund

KLM/bls  
Certificate of Service

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**Petition of PPL Electric Utilities** :  
**Corporation for Approval of a** :  
**Default Service Program and** : **Docket No. P-2014-2417907**  
**Procurement Plan for the Period** :  
**June 1, 2015 through May 31, 2017** :

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**PETITION TO INTERVENE OF  
THE SUSTAINABLE ENERGY FUND**

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**TO THE PENNSYLVANIA PUBLIC UTILITY COMMISSION:**

The Sustainable Energy Fund (“SEF”), by and through its attorney, Kenneth L. Mickens, hereby 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 avers as follows:

**I. BACKGROUND**

1. On April 18, 2014, PPL Electric Utilities Corporation (“PPL Electric” or “Company”) filed with the Pennsylvania Public Utility Commission (“Commission”) a request for approval of its Phase III default service program (“Phase III DSP”) and procurement plans for the period June 1, 2015 through May 31, 2017.

2. The DSP III Program consists of a proposal for competitive procurement of Default Service supply and related Alternative Energy Credits during the DSP III Program Period; an implementation plan; a proposed rate design, including a Time-of-Use (“TOU”) rate option for default service during the DSP III Program Period; a proposal to continue and expand PPL Electric’s current Standard Offer Referral Program; and, a contingency plan for the DSP III Program. PPL Electric Petition, p. 1.

3. The Company proposes to implement a TOU rate option throughout the Phase III DSP. PPL Electric Petition, p. 3. The Company filed a previous TOU plan before the Commission at Docket Number P-2013-2389572. In that proceeding, SEF and several other parties reached a partial settlement for TOU service that is now being considered by the Commission. PPL Electric Petition, p. 19. PPL Electric has proposed that the TOU program outlined in the partial settlement be approved for continuation during Phase III DSP. PPL Electric Petition, p. 3.

4. SEF is a Pennsylvania corporation established at the conclusion of PPL Electric’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, energy conservation, renewable energy and

energy education in order to provide opportunities and benefits for PPL Electric ratepayers.

5. SEF's address is as follows:

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

6. The name, address and telephone number of SEF's attorney are:

Kenneth L. Mickens, Esq.  
PA Attorney I.D. #31255  
316 Yorkshire Drive  
Harrisburg, PA 17111  
[kmickens11@verizon.net](mailto:kmickens11@verizon.net) (e-mail)  
(717) 343-3338 (Telephone)  
(717) 657-0938 (FAX)

## II. SEF's INTEREST IN THE PROCEEDING

7. SEF's mission, as mentioned above, is to promote and invest in energy efficiency, energy conservation, renewable energy and energy education that provide opportunities and benefits for PPL Electric customers. 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.

8. SEF's mission, in large part, is focused on reductions in consumption and demand for the non-renewable, non-sustainable production

of electricity within the PPL Electric service territory. In this proceeding, SEF is interested in how the Company's Phase III DSP proposal will impact the TOU program and the access to this program by net metering customers. In addition, SEF would like to explore the impact of PPL Electric's net metering proposals on third-party business model systems.

9. Accordingly, SEF's intervention is necessary to ensure the development of a complete record on the reasonableness of the Phase III DSP proposal. SEF has a unique perspective, in keeping with its mission to promote and invest in energy efficiency, energy conservation, renewable energy and energy education that provide opportunities and benefits for PPL Electric ratepayers that cannot be represented by any other party to this proceeding. SEF submits that this unique interest coincides with the public interest and should be considered by the Commission.

10. Moreover, SEF has experience and expertise in matters of energy efficiency, energy conservation and consumer education such that its participation in this proceeding would benefit the record.

11. SEF intends to actively participate in this proceeding.

WHEREFORE, for the reasons discussed herein, the Sustainable Energy Fund 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,



Kenneth L. Mickens, Esq.

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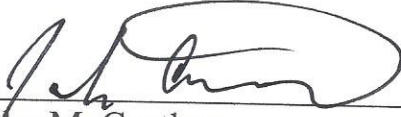
FAX: (717) 657-0938

Attorney for the Sustainable Energy  
Fund

DATED: May 14, 2014

**AFFIDAVIT**

I, John M. Costlow, certify that I am the Director of Technical Services of the Sustainable Energy Fund and that, in said capacity, I am authorized to and do make this Affidavit for it, that the facts set forth in the foregoing document are true and correct to the best of my knowledge, information and belief and that I expect the Sustainable Energy Fund to be able to prove the same at any hearing hereof. I understand that false statements made herein are made subject to the penalties of 18 Pa. C.S. Section 4904, relating to unsworn falsifications to authorities.

  
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John M. Costlow,  
Director of Technical Services  
Sustainable Energy Fund

DATED: May 14, 2014

**CERTIFICATE OF SERVICE**

**Docket No. P-2014-2417907**

I hereby certify that I have this day served a copy of the foregoing Petition to Intervene of the Sustainable Energy Fund to the following persons in accordance with the requirements of 52 Pa. Code §1.54 et.seq. (relating to service by a participant).

Hon. Susan D. Colwell  
Administrative Law Judge  
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