

Citizens for Pennsylvania's Future
200 First Avenue, Suite 200
Pittsburgh, PA 15222
(412) 456-2901

May 23, 2014

Secretary Rosemary Chiavetta
Pennsylvania Public Utility Commission
400 North Street, 2nd Floor North
P.O. Box 3265
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

Docket No. P-2014-2417907

Dear Secretary Chiavetta:

Enclosed, please find an original copy of Citizens for Pennsylvania's Future Petition to
Intervene in the above captioned matter.

Copies are being served in accordance with the attached Certificate of Service.

Sincerely,



Heather M. Langeland

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**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of PPL Electric Utilities	:	
Corporation for Approval of a Default	:	P-2014-2417907
Service Program and Procurement	:	
Plan for the Period June 1, 2015	:	
Through May 31, 2017	:	

**PETITION TO INTERVENE OF
CITIZENS FOR PENNSYLVANIA'S FUTURE**

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Now comes Citizens for Pennsylvania's Future ("PennFuture"), by counsel, Heather M. Langeland, and hereby Petitions to Intervene in the above captioned matter. Petitioner requests that the Pennsylvania Public Utility Commission ("Commission") grant Petitioner status as Intervenor in these proceedings concerning the Petition of PPL Electric Utilities Corporation ("PPL") for Approval of a Default Service Program and Procurement Plan for the Period June 1, 2015 through May 31, 2017 filed April 18, 2014.

PETITION TO INTERVENE

Petitioner provides the following in support of its Petition to Intervene:

1. Petitioner is PennFuture, a Pennsylvania nonprofit corporation with offices in Philadelphia, West Chester, Wilkes-Barre, Harrisburg, and Pittsburgh, Pennsylvania (www.pennfuture.org). PennFuture's principal business location is 610 North Third Street, Harrisburg, PA 17101, tel. (717) 214-7920. PennFuture has members who live in the PPL service territories, are customers of PPL and/or receive

service from PPL. PennFuture engages in policy development, public education, litigation and other strategies to achieve its goals, including promoting clean energy and energy efficiency.

2. The name and address of counsel for Petitioner is:

Heather M. Langeland, Staff Attorney
PennFuture
200 First Street, Suite 200
Pittsburgh, PA 15222
Phone: 412-456-2901
Fax: 412-258-6685
langeland@pennfuture.org

3. On or about April 18, 2014, PPL, pursuant to Section 2807 of the Public Utility Code, 66 Pa.C.S. § 2807, and 52 Pa. Code §§ 54.181-54.189, petitioned the Commission for approval of its third Default Service Program and Procurement Plan to establish the terms and conditions under which PPL Electric will acquire and supply Default Service or provider of last resort service from June 1, 2015 through May 31, 2017 (“Petition”).

4. Pursuant to the First Prehearing Order issued May 5, 2014, all Petitions to Intervene must be filed by May 30, 2015, making this submission timely.

5. Distribution company default service plans cover electricity generation procurement, among other things, for customers that do not switch to competitive electricity providers. The Petitioner, on behalf of its members and the public interest, have an interest in ensuring that distribution companies' procurement plans maximize renewable energy development.

6. Petitioner has a right and interest in assuring that safe, reliable, clean and affordable public utility service, and participation in these Proceedings is an appropriate

way to protect these rights and interests. Petitioner may intervene in this proceeding pursuant to 52 Pa. Code §§ 5.71-74.

7. Petitioner has interests in and perspectives on issues in this proceeding that are not adequately represented by other parties of record.

8. Petitioner intends to review and analyze PPL's Petition as it pertains to default service AEPS compliance. The variety and type of contracts utilized will directly impact Petitioner's members' interests in ensuring cost effective renewable energy development.

9. Petitioner reserves the right to raise other issues as necessary and appropriate during the course of the proceeding and to respond to issues raised by other parties.

10. All documents and correspondence in this proceeding should be addressed to:

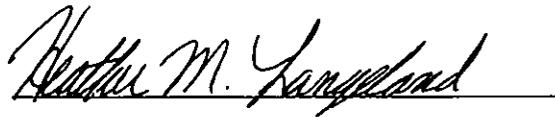
Heather Langeland, Staff Attorney
PennFuture
200 First Street, Suite 200
Pittsburgh, PA 15222
Phone: (412) 456-2901
Fax: (412) 258-6685
langeland@pennfuture.org

For the foregoing reasons, Petitioner requests that the Commission grant this Petition and confer status as Intervenor in this Proceeding.

CONCLUSION

Wherefore, PennFuture respectfully requests that the Commission grant this Petition to Intervene, provide PennFuture with full-party status in this proceeding, and allow such other relief as it deems necessary.

Respectfully submitted,

A handwritten signature in black ink, reading "Heather M. Langeland", is written over a horizontal line.

Heather M. Langeland, Staff Attorney
Pa. Bar Id. No. 207387
200 First Street, Suite 200
Pittsburgh, PA 15222
Phone: 412-456-2901
Fax: 412-258-6685
langeland@pennfuture.org

Counsel for Petitioner PennFuture

DATED: May 23, 2014

VERIFICATION

I, Christina Simeone, am the Director for Citizens for Pennsylvania's Future's Center for Energy, Enterprise and the Environment. I hereby state facts set forth herein are true and correct to the best of my knowledge, information and belief and that I expect to be able to prove the same at a hearing held in this matter. I understand that the statements made herein are subject to the penalties of 18 Pa.C.S. Section 4904 concerning unsworn falsification to authorities.



DATED: May 23, 2014

Christina Simeone, Director
PennFuture Energy Center

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**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of PPL Electric Utilities :
Corporation for Approval of a Default : P-2014-2417907
Service Program and Procurement :
Plan for the Period June 1, 2015 :
Through May 31, 2017 :

CERTIFICATE OF SERVICE

I, Heather M. Langeland, do hereby certify that a true and accurate copy of the foregoing "PETITION TO INTERVENE OF CITIZENS FOR PENNSYLVANIA'S FUTURE" was served on May 23, 2014 on the following by depositing a copy of the same in the United States mail, postage prepaid and addressed to:

Michael W. Hassell, Esq.
Christopher T. Wright, Esq.
David B. McGregor, Esq.
Post & Schell PC
17 North Second Street
12th Floor
Harrisburg, PA 17101-1601

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

Kenneth L. Mickens, Esq.
316 Yorkshire Drive
Harrisburg, PA 17111-6933

Paul E. Russell, Esq.
PPL Electric Utilities Corporation
2 North Ninth Street
Allentown, PA 18101

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Hobart J. Webster, Esq.
Office of Consumer Advocate
555 Walnut Street
5th Floor Forum Place
Harrisburg, PA 17101-1923

Carrie B. Wright
Bureau of Investigation and Enforcement
P.O. Box 3265
Harrisburg, PA 17105-3265

A handwritten signature in black ink, reading "Heather M. Langeland". The signature is written in a cursive style and is positioned above a horizontal line.

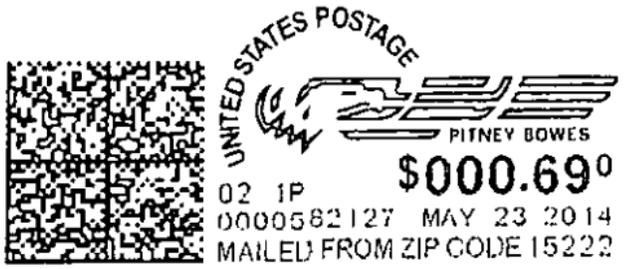
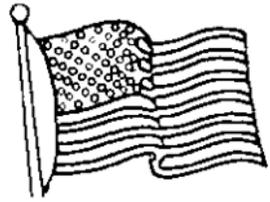
Heather M. Langeland, Esq.



PennFUTURE
 Every environmental victory grows the economy.

The Waterfront Building
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 Pittsburgh, PA 15222-1557

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 Pennsylvania Public Utility Commission
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