

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of Philadelphia Gas Works for	:	
Approval of Demand-Side Management	:	Docket No. P-2014-2459362
Plan for FY 2016-2020	:	
and Docket No. P-2014-2459362	:	
Philadelphia Gas Works Universal	:	
Service and Energy Conservation Plan	:	
for 2014-2016, 52 PA. Code § 62.4 -	:	
Request for Waivers	:	

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**CLEAN AIR COUNCIL'S PETITION TO INTERVENE**

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Pursuant to 52 Pa. Code §§ 5.72-5.75 Clean Air Council ("CAC") hereby files this Petition to Intervene in the above captioned proceeding. In support thereof, CAC states as follows:

1. CAC is a member-supported environmental organization serving the Mid-Atlantic Region. CAC is dedicated to protecting and defending everyone's right to breathe clean air. CAC works through a broad array of related sustainability and public health initiatives, using public education, community action, government oversight, and enforcement of environmental laws.

2. CAC's attorneys in this matter are:

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3. On December 23, 2015, Philadelphia Gas Works ("PGW" or "Company") filed a Petition for Approval of Demand-Side Management Plan for FY 2016-2020 ("2016 DSM Plan"). The Commission approved PGW's initial DSM Plan for FY 2011-2015 ("Initial DSM Plan") in July 2010, pursuant to the settlement of PGW's 2009 base rate filing at Docket Nos. P-2009-2097639 and R-2009-2139884. PGW has proposed the 2016 DSM Plan to continue certain programs from the Initial DSM Plan and add two new programs.

4. PGW's 2016 DSM Plan presents a proposed portfolio consisting of seven DSM programs, including the following five programs continued from the Initial DSM Plan:

- (a) CRP Home Comfort program (formerly referred to as ELIRP), providing weatherization treatments to the highest usage customers in PGW's Customer Assistance Program (CAP);
- (b) Residential Equipment Rebates program, providing prescriptive residential-sized heating equipment rebates targeting the replacement of equipment at the end of its operational life;
- (c) Commercial Equipment Rebates program, providing prescriptive commercial-sized heating and cooking equipment rebates targeting replacement at the end of its operational life;
- (d) Efficient Building Grants program providing custom project grants for existing commercial and multifamily buildings; and
- (e) Efficient Construction Grants program providing custom project grants for new and gut rehabilitated commercial and multifamily buildings, and single family homes. 2016 DSM Plan at 3-4.

5. In addition to the five continued programs, PGW also proposes to establish:

- (a) A Low-Income Multifamily Program to supplement the CRP Home Comfort program; and
- (b) An Efficient Fuel-Switching Program designed to promote cost-effective load management projects for commercial and industrial end-users currently utilizing other more expensive and less efficient fuels. *Id* at 4.

6. PGW anticipates total program expenditures of approximately \$25 million, including \$22.7 million for the conservation programs and \$2.3 million for the Efficient Fuel-Switching Program. *Id.* at 5.

7. The Commission's regulations allow intervention where a person has an interest in the proceeding which may be directly affected and which is not adequately represented by existing parties, and, as to which the person may be bound by the action of the Commission in the proceeding. 52 Pa. Code § 5.72(a)(2). Intervention is also permitted where participation of the person may be in the public interest. 52 Pa. Code § 5.72(a)(3). A "person" includes a corporation and an association. 52 Pa. Code § 1.8.

8. CAC meets the standards for intervention set forth in 52 Pa. Code § 5.72(a). CAC is committed to improving air quality throughout the Mid-Atlantic Region; reducing the impact of air pollution on the health of vulnerable populations; and, ensuring full implementation of the Clean Air Act and other laws intended to reduce air pollution. The Commission's actions in this proceeding regarding PGW's proposed conservation measures will have a direct impact on the ability of CAC to achieve these goals.

9. CAC's interests in this proceeding are unique from, and not adequately represented by other parties that may seek to intervene because CAC is a well-established local environmental organization.

10. CAC's intervention is in the public interest because it will enable CAC to contribute its unique perspective and insight of a well-established local environmental organization as the Commission considers PGW's proposals.

11. Due to the early stage of this proceeding, CAC reserves the right to raise and address issues identified through its continued review and analysis of PGW's 2016 DSM Plan (and related information) or other issues raised by other parties.

12. Finally, while PGW requested a deadline of January 12, 2015 for intervention, the Commission has not issued an Order or Notice granting the request. Without such a request being granted, and in light of the fact that the Commission has not taken any procedural action on PGW's Petition to date, CAC requests that this Petition to Intervene be deemed timely filed.

**WHEREFORE**, Clean Air Council respectfully requests that the Commission grant this Petition to Intervene.

Respectfully submitted,



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Joseph Otis Minott, Esquire



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Ernest Logan Welde, Esquire

Date: January 16, 2015

Attorneys for Clean Air Council