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April 20, 2015

Via E-Filing

Secretary Rosemary Chiavetta
Pennsylvania Public Utility Commission
PO Box 3265
Harrisburg, PA 17105-3265

**Re: Pennsylvania Public Utility Commission v.
PECO Energy Company
Docket No. R-2015-2468981**

Dear Secretary Chiavetta:

Enclosed please find the **Petition to Intervene of Tenant Union Representative Network and Action Alliance of Senior Citizens of Greater Philadelphia** in the above captioned matter.

Copies are being served on parties as identified in the attached certificate of service. If you have any questions, please contact me at (215) 227-4378

Sincerely,

A handwritten signature in cursive script that reads 'Josie B. H. Pickens'.

Josie B. H. Pickens, Esq.
Attorney for TURN et al.
Community Legal Services, Inc
1410 West Erie Avenue
Philadelphia, PA 19140
(215) 227-4378

Enclosures

cc: Certificate of Service

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

Pennsylvania Public Utility Commission :
v. :
PECO Energy Company : Docket No. R-2015-2468981
:

PETITION TO INTERVENE OF
TENANT UNION REPRESENTATIVE NETWORK AND
ACTION ALLIANCE OF SENIOR CITIZENS OF GREATER PHILADELPHIA

Tenant Union Representative Network and Action Alliance of Senior Citizens of Greater Philadelphia, through its counsel Community Legal Services of Philadelphia, hereby petitions the Pennsylvania Public Utility Commission (“Commission”) to intervene in the above-captioned proceeding pursuant to the Rules of Practice and Procedure of the Pennsylvania Public Utility Commission (“PUC” or “Commission”), 52 Pa. Code §§ 5.61-5.76, and in support, state as follows:

1. Petitioners are Philadelphia based consumer membership and advocacy organizations, Tenant Union Representative Network (“TURN”) and Action Alliance of Senior Citizens of Greater Philadelphia (“Action Alliance”) (hereinafter “TURN et al.”), who advocate on behalf of low and moderate income residential customers and consumers of the utility services of PECO Energy Company (“PECO”).

2. Petitioners are represented by:

Josie B. H. Pickens, Esquire (Attorney ID: 309422)
COMMUNITY LEGAL SERVICES, INC.
1410 West Erie Avenue
Philadelphia, PA 19140
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Thu B. Tran, Esquire (Attorney ID: 83086)
Robert W. Ballenger, Esquire (Attorney ID: 93434)
COMMUNITY LEGAL SERVICES, INC.
1424 Chestnut Street
Philadelphia, PA 19102
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3. On March 27, 2015, PECO submitted a general base rate filing for electric operations. In its filing, PECO proposes to increase its electric distribution rates by approximately \$190 million, effective May 26, 2015. PECO's proposed rates and other changes are set forth in PECO's Tariff Electric – Pa. PUC No. 5 (“Tariff No. 5”).

4. TURN is a not-for-profit advocacy organization composed of moderate and low income tenants, a substantial number of whom are customers of PECO or dependent on PECO electric service and all residing in Philadelphia, PA. In those capacities, they have a direct, immediate, substantial and distinct interest in PECO's general base rate filing for electric operations. TURN is located at 1315 Walnut Street, Philadelphia, PA 19107.

5. Action Alliance is a not-for-profit membership organization of senior citizens, many of whom are Philadelphia taxpayers, residents and customers of PECO, on which they rely for their electric service needs. In those capacities, they have a direct, immediate, substantial and distinct interest in PECO's general base rate filing for electric operations.

6. TURN et al. were a party to PECO's last filed rate case at Docket No. R-2010-2161575. TURN et al. were also a party to PECO's most recent Universal Service and Energy Conservation Plan proceedings at Docket No. M-2012-2290911 and were parties to prior Commission proceedings involving PECO, including, but not limited to, the following:

- a. Petition of PECO Energy for Approval of Its Act 129 Energy Efficiency and Conservation Plan and Expedited Approval of Its Compact Fluorescent Lamp Program, Docket No. M-2009-2093215;

b. Petition of PECO Energy Company for Approval of its Default Service Program and Rate Mitigation Plan, Docket No. P-2008-2062739;

c. Petition of PECO Energy Company for Approval of its Market Rate Transition Energy Efficient Package, Docket No. P-2008-2062740;

d. Petition of PECO Energy Company for Approval of its Market Rate Transition Phase-In Program, Docket No. P-2008-2062741; and

e. In the Matter of PECO Energy Company Universal Services Three-Year Plan 2007-2009 Submitted in Compliance with 52 Pa. Code § 54.74, Docket No. M-00061945.

7. PECO proposes to increase revenue by \$98.8 million per year for Rate R Residential Service and by approximately \$26 million for Rate RH Residential Heating Service. This includes a proposal to increase the Rate R and Rate RH service charge to \$12 per month.

8. PECO also proposes an in-program arrearages forgiveness program in recognition that PECO's CAP customer population has accumulated significant arrearages since entering into PECO's CAP program and these arrearages are an impediment to achieving affordability under PECO's impending Fixed Credit Option CAP structure.

9. TURN et al. have preliminarily reviewed PECO's rate filing, and intend to examine in this proceeding whether PECO's request for a rate increase will result in unjust and unreasonable rates for Philadelphia's low income residential customers and consumers.

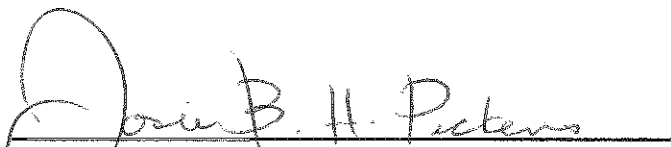
10. TURN et al. were a party to the settlement recently reached regarding PECO's CAP design at Docket No. M-2012-2290911, which resulted in the proposed in-program arrearage forgiveness proposal that is contained in this rate case filing. TURN et al. have a significant interest in ensuring that the in-program arrearage forgiveness proposal receives final approval from the Commission.

11. PECO's general base rate filing for electric operations is of critical importance to the low income PECO residential customers and consumers who are members of TURN et al. who

stand to benefit from affordable electric service and who, due to limited income, may be harmed disproportionately by the imposition of unjust or unreasonable rates. The petitioners therefore have interests in this proceeding, which may be directly affected and which are not adequately represented by other participants, and as to which the petitioners may be bound by the action of the Commission in this proceeding.

WHEREFORE, TURN et al. respectfully request that the Commission enter an order granting TURN et al. full status as an intervener in this proceeding with active party status.

Respectfully submitted,



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Robert W. Ballenger, Esquire (Attorney ID: 93434)
COMMUNITY LEGAL SERVICES, INC.
1424 Chestnut Street
Philadelphia, PA 19102

Attorneys for TURN et al.

Date: April 20, 2015

VERIFICATION

I, Phil Lord, on behalf of Tenant Union Representative Network (TURN), hereby state that the facts contained in the foregoing pleading are true and correct to the best of my knowledge, information and belief, that I am duly authorized to make this Verification, and that I expect to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 10 Pa.C.S. § 4904 (relating to unsworn falsification to authorities).

Date: April 20, 2015



Title: Executive Director, TURN

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

Pennsylvania Public Utility Commission :
v. :
PECO Energy Company : Docket No. R-2015-2468981
:

Certificate of Service

I hereby certify that I have this day served copies of the **Petition to Intervene of Tenant Union Representative Network and Action Alliance of Senior Citizens of Greater Philadelphia** upon the parties of record in the above captioned proceeding in accordance with the requirements of 52 Pa. Code § 1.54 in the manner and upon the persons listed below.

VIA FIRST CLASS MAIL

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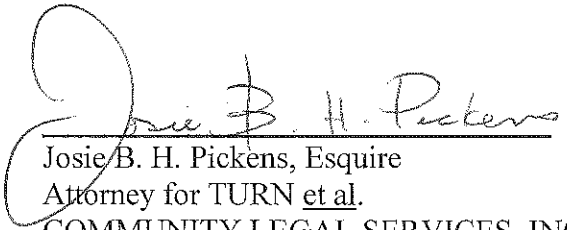
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Respectfully submitted,



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