

<b>PECO ENERGY COMPANY'S PILOT</b>	<b>: Docket No. P- 2016-2573023</b>
<b>PLAN FOR AN ADVANCE PAYMENTS</b>	<b>:</b>
<b>PROGRAM SUBMITTED PURSUANT</b>	<b>:</b>
<b>TO 52 PA. CODE § 56.17</b>	<b>:</b>
<b>AND</b>	<b>:</b>
<b>PECO ENERGY COMPANY'S PETITION</b>	<b>:</b>
<b>FOR TEMPORARY WAIVER OF PORTIONS</b>	<b>:</b>
<b>OF THE COMMISSION'S REGULATIONS</b>	<b>:</b>
<b>WITH RESPECT TO THAT PLAN</b>	<b>:</b>

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**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 petition 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)  
 Lydia R. Gottesfeld, Esquire (Attorney ID. No. 318974)  
 Robert W. Ballenger, Esquire (Attorney ID. No. 93434)

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3. On October 26, 2016, PECO filed its Pilot Plan for an Advance Payments Program and Petition for Temporary Waiver of Portions of the Commission's Regulations with Respect to That Plan (Pilot Plan and Petition) with the Commission.

4. On November 15, 2016, TURN et al. filed an Answer to the Pilot Plan and Petition with the Commission.

5. 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 proposed plan and request for waivers. TURN is located at 1315 Walnut Street, Philadelphia, PA 19107.

6. 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 proposed plan and request for waivers.

7. TURN *et al.* were parties to prior Commission proceedings involving PECO, including, but not limited to, the following:

- a. Petition of PECO Energy Company for Approval of a Default Service Program for the Period of June 1, 2017 through May 31, 2019, Docket No. P-2016-2534980;
- b. PECO Energy Company Universal Services Three-Year Plan 2016-2018 Docket No. M-2015-2507139;
- c. Pennsylvania Public Utility Commission v. PECO Energy Company Docket No. R-2015-2468981.

8. In its Pilot Plan and Petition, PECO seeks to implement a pilot for a prepayment meter program to commence during, or prior to, the first quarter of 2018. (Pilot Plan and Petition, Attachment 1). PECO contends that its Pilot Plan tracks existing Commission regulations on Advance Payments plans and that the Commission's review of the Pilot Plan should not include a separate determination of whether the plan is in the public interest. PECO is also requesting that the Commission waive several provisions of its regulations.

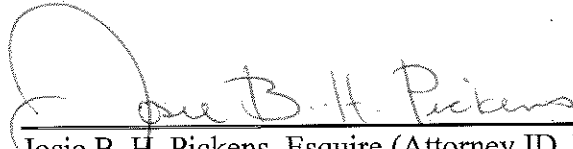
9. TURN *et al.* have preliminarily reviewed PECO's Pilot Plan and Petition, and intend to examine in this proceeding whether PECO's proposal is consistent with Pennsylvania law, adequately protects PECO's customers, and is in the public interest.

10. TURN *et al.* are concerned that if approved PECO's Pilot Plan will endanger moderate income and vulnerable households. TURN *et al.* have outlined several preliminary concerns in its Answer, which was filed with the Commission on November 15, 2016.

11. PECO's Pilot Plan and Petition raise issues that are of critical importance to the PECO residential customers and consumers who are members of TURN *et al.* who may be harmed by PECO's proposal. 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,

A handwritten signature in dark ink, appearing to read "Josie B. H. Pickens", is written over a horizontal line.

Josie B. H. Pickens, Esquire (Attorney ID. No. 309422)  
Lydia R. Gottesfeld, Esquire (Attorney ID. No. 318974)  
Robert W. Ballenger, Esquire (Attorney ID. No. 93434)  
Attorneys for TURN *et al.*

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Date: November 16, 2016

## 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: November 16, 2016

A handwritten signature in cursive script that reads "Phil Lord".

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Title: Executive Director, TURN

PECO ENERGY COMPANY'S PILOT PLAN  
FOR AN ADVANCE PAYMENTS PROGRAM  
SUBMITTED PURSUANT TO 52 PA. CODE  
§ 56.17

AND

PECO ENERGY COMPANY'S PETITION FOR  
TEMPORARY WAIVER OF PORTIONS  
OF THE COMMISSION'S REGULATIONS WITH  
RESPECT TO THAT PLAN

Docket No. P- 2016-2573023

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**, via first class mail, on:

Tanya McCloskey  
Acting Consumer Advocate  
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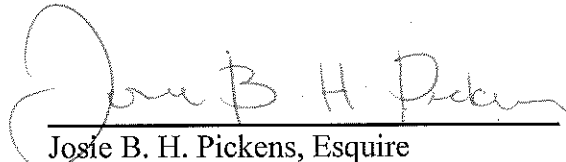
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Respectfully submitted,

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