



April 6, 2020

KENNETH L. MICKENS, ESQUIRE LLC
LEGAL CONSULTING

E-FILE

Rosemary Chiavetta, Secretary
PA 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 & Procurement Plan
Docket No. P-2020-3019356
Petition to Intervene of Sustainable Energy Fund**

Dear Secretary Chiavetta:

Enclosed for filing with the Commission is the Petition to Intervene of Sustainable Energy Fund ("SEF") in the above-captioned proceeding. I have also enclosed the Affidavit of John M. Costlow, the President of SEF. Copies have been served on all known parties to this proceeding. A Certificate of Service is attached. Please contact me if you have any questions.

Sincerely,

Kenneth L. Mickens, Esquire
Attorney for Sustainable Energy Fund

KLM/bls
Certificate of Service
Enclosures

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of PPL Electric Utilities

Corporation for Approval of a :
Default Service Program and : **Docket No. P-2020-3019356**
Procurement Plan for the Period :
June 1, 2021 through May 31, 2025 :

**PETITION TO INTERVENE OF
THE SUSTAINABLE ENERGY FUND OF
CENTRAL EASTERN PENNSYLVANIA**

TO THE PENNSYLVANIA PUBLIC UTILITY COMMISSION:

The Sustainable Energy Fund of Central Eastern Pennsylvania (“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 March 25, 2020, PPL Electric Utilities Corporation (“PPL Electric” or “Company”) filed with the Pennsylvania Public Utility Commission (“Commission”) a request for approval of its fifth Default Service Program and Procurement Plan (“DSP V Program”) to establish the terms and conditions under which PPL Electric will acquire and supply

default service or provider of last resort service (“Default Service”), from June 1, 2021 through May 31, 2025 (the “DSP V Program Period”).

2. The DSP V Program consists of a proposal for the competitive procurement of Default Service supply and related Alternative Energy Credits (“AECs”) during the DSP V Program Period; an implementation plan; a proposed rate design, including a Time-of-Use (“TOU”) rate option for Default Service during the DSP IV Program Period; a proposal to continue the Company’s current Standard Offer Referral Program; a proposal to allow Customer Assistance Program (“CAP”) customers to take Default Service; and, a contingency plan for the DSP V Program. PPL Electric requests that the Pennsylvania Public Utility Commission approve the DSP V Program (as further described in its Petition) within nine (9) months or no later than December 25, 2020, to provide sufficient time to implement procurement under the DSP V Program. PPL Electric Petition, pp. 1-2.

3. 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.

4. SEF's address is as follows:

The Sustainable Energy Fund of Central Eastern Pennsylvania
4250 Independence Drive, Suite 100
Schnecksville, PA 18078

5. 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 (e-mail)
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II. SEF's INTEREST IN THE PROCEEDING

6. 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. In this regard, SEF has been certified as a Conservation Services Provider.

7. 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. SEF's interest in this Default Service proceeding relates to PPL Electric's proposed Time-of-Use plan and the proposed changes to Alternative Energy Credit ("AEC") procedures. Time of use rates impact non-sustainable power plant emissions, while AEC procedures directly impact the implementation of sustainable sources of electricity. In other words, these proposed plans directly affect sustainable energy production and the reduction of non-sustainable sources of electricity. Consequently, SEF would like to explore the potential impact of PPL Electric's proposed plans.

8. Accordingly, SEF's intervention is necessary to ensure the development of a complete record on the reasonableness of the proposed plans. 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.

9. 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.

10. SEF intends to actively participate in this proceeding.

WHEREFORE, for the reasons discussed herein, the Sustainable Energy Fund of Central Eastern Pennsylvania 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,



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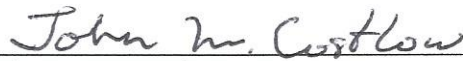
FAX: (717) 657-0938

Attorney for The Sustainable Energy
Fund

DATED: April 6, 2020

AFFIDAVIT

I, John M. Costlow, certify that I am the President/CEO 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 SEF Petition to Intervene (Docket # P-2020-3019356) are true and correct to the best of my knowledge, information and belief . 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.



John M. Costlow
President/CEO
Sustainable Energy Fund

DATED: April 6, 2020

CERTIFICATE OF SERVICE
Docket No. P-2020-3019356

I hereby certify that I have this day served a copy of the foregoing Petition to Intervene via email upon the following participants in accordance with the requirements of 52 Pa. Code Section 1.54, *et. seq. (relating to service by a participant)*:

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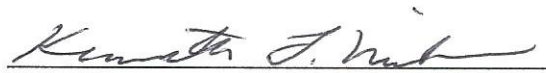
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Kenneth L. Mickens, Esq.
Attorney for the Sustainable Energy
Fund

Dated: April 6, 2020