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December 21, 2020

via Electronic Filing

Rosemary Chiavetta, Secretary Pennsylvania Public Utility Commission 400 North Street, Filing Room Harrisburg, PA 17120

RE: Duquesne Light Company – Petition for Approval of Act 129 Phase IV

Energy Efficiency & Conservation Plan

Docket No. M-2020-3020818

Dear Secretary Chiavetta:

Please accept for filing the Community Action Association of Pennsylvania's Petition to Intervene in the above-referenced matter. A copy of this filing was served in accordance with the attached Certificate of Service.

Respectfully submitted,

Joseph L. Vullo

JLV/jar encl.

cc: All Parties of Record

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

Duquesne Light Company – Petition

For Approval of Act 129 Phase IV Energy : Docket No. M-2020-3020818

Efficiency & Conservation Plan

COMMUNITY ACTION ASSOCIATION OF PENNSYLVANIA'S
PETITION TO INTERVENE

NOW COMES, the Community Action Association of Pennsylvania (CAAP), by and

through counsel, Joseph L. Vullo, Esquire, and petitions to intervene in the above-captioned

matter, averring as follows:

1. The Petitioner, Community Action Association of Pennsylvania, is a statewide

association representing Pennsylvania's community action agencies that provide anti-poverty

planning and community development activities for low-income communities and services to

individuals and families.

2. For more than 25 years, one of CAAP's primary missions has been to represent

the energy interests of low-income citizens in proceedings before the Pennsylvania Public Utility

Commission and as such, CAAP has a direct and substantial interest in this proceeding that

cannot be adequately represented by any other party.

3. CAAP is comprised of forty-three member agencies including agencies in the

Columbia Gas of Pennsylvania's service areas. Specifically, the agencies listed in Exhibit A

attached are members of CAAP, customers of Duquesne Light Company and service customers

of the Company.

4. CAAP seeks permission to intervene in Duquesne Light Company's Petition for

Approval of Act 129 Phase IV Energy Efficiency & Conservation Plan pursuant to the above-

captioned docket number.

- 5. CAAP has intervened and has been granted intervention and active party status in prior rate and Act 129 proceedings before the Pennsylvania Public Utility Commission. CAAP was granted intervenor status in the rate case recently filed by this Company in 2018 (Docket No. R-2018-3000124).
- 6. CAAP seeks permission to intervene in Duquesne Light Company's Petition for Approval of Act 129 Phase IV Energy Efficiency & Conservation Plan to address in large part the portion of the Company's Plan that concerns low-income customers. CAAP reserves the right to address other parts of the Company's Plan.
- 7. CAAP's participation as an active party in this proceeding is required to protect its substantial interests and the substantial interests of the low-income citizens it represents in ensuring that they receive the energy consumption benefits as required under Act 129. Accordingly, CAAP's participation in this proceeding will serve the public interest.
- 8. Because CAAP represents low-income citizens in the Company's service areas, the interests of its clients are not protected by any other party to this action.

POSITIONS

- 9. CAAP reserves the right to address all portions of the Company's Plan but its main purpose is to address that portion of the Plan that addresses low-income customers.
- 10. There is a substantial public interest in ensuring that low-income customers receive the consumption reduction benefits as required under Act 129.

REQUEST FOR RELIEF

WHEREFORE, CAAP respectfully requests that the Commission:

- 1. Receive for filing and docket this Petition to Intervene and order that CAAP be an active party to such proceedings and be placed on all services lists.
- 2. Grant to CAAP active party status with right to participate in all proceedings relative to this matter.

3. Order that the following individuals be designated as CAAP's recipients for service:

Joseph L. Vullo, Esquire 1460 Wyoming Avenue Forty Fort, PA 18704

Phone: Fax:

(570) 288-6441 (570) 288-4598

e-mail: jlvullo@bvrrlaw.com

Counsel for CAAP

- 4. Order that each party to the proceedings provide CAAP's designated recipient with copies of all papers filed.
 - 5. Grant such other relief as the Commission may deem necessary and proper.

Respectfully submitted,

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Attorney for Community Action Association
of Pennsylvania

EXHIBIT A

COMMUNITY ACTION ASSOCIATION OF PENNSYLVANIA MEMBER AGENCIES

Allegheny County Department of Human Services

Community Services Program of Beaver County

Pittsburgh Community Services

VERIFICATION

I, SUSAN A. MOORE, Chief Executive Officer of Community Action Association of Pennsylvania, hereby verify that I am authorized to execute this Verification and that the facts set forth in the foregoing Petition to Intervene are true and correct to the best of my knowledge, information and belief.

> COMMUNITY ACTION ASSOCIATION OF PENNSYLVANIA

BY:
SUSAN A. MOORE Chief Executive Officer

Dated: 12 21 2020

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

Duquesne Light Company – Petition

For Approval of Act 129 Phase IV Energy Docket No. M-2020-3020818

Efficiency & Conservation Plan

CERTIFICATE OF SERVICE

The undersigned certified that he served a copy of the foregoing Community Action Association of Pennsylvania's Petition to Intervene upon the following participants this 21st day of December, 2020, via electronic mail:

Michael Zimmerman, Esquire Senior Counsel, Regulatory Duquesne Light Company 411 Seventh Avenue Pittsburgh, PA 15219 mzimmerman@duqlight.com

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