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December 21, 2020

via Electronic Filing

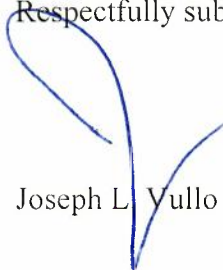
Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
400 North Street, Filing Room
Harrisburg, PA 17120

RE: Joint Petition for Consolidation of Proceedings and Approval of Phase IV Energy Efficiency and Conservation Plan of Metropolitan Edison Company, Pennsylvania Electric Company, Pennsylvania Power Company, and West Penn Power Company
Docket Nos.: M-2020-3020820, M-2020-3020821, M2020-3020822, and M-2020-3020823

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**

Joint Petition for Consolidation of Proceedings	:	Docket Nos.	M-2020-3020820
And Approval of the Phase IV Energy Efficiency	:		M-2020-3020821
And Conservation Plan of Metropolitan Edison	:		M-2020-3020822
Company, Pennsylvania Electric Company,	:		M-2020-3020823
Pennsylvania Power Company, and West Penn	:		
Power Company	:		

**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 service areas of these companies. Specifically, the agencies listed in Exhibit A attached are members of CAAP, customers of the companies and serve clients who are customers of the companies.

4. CAAP seeks permission to intervene in Metropolitan Edison Company's, Pennsylvania Electric Company's, Pennsylvania Power Company's and West Penn Power

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 prior rate cases filed by Peoples Natural Gas Company, LLC (Docket No. R-2018-3006818); Duquesne Light ((R-2018-3000124; and Columbia Gas (R-2020-3018835. CAAP also was also granted intervention in other PUC proceedings.

6. CAAP seeks permission to intervene in Metropolitan Edison Company's, Pennsylvania Electric Company's, Pennsylvania Power Company's and West Penn Power Company's Petition for Approval of Act 129 Phase IV Energy Efficiency & Conservation Plan to address in large part the portion of the Companies' Plans that concerns low-income customers. CAAP reserves the right to address other parts of the Companies' Plans.

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 Companies' 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 Companies' Plans but its main purpose is to address that portion of the Plans 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:

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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

Armstrong County Community Action Agency

Blair County Community Action

Center for Community Action

Central Pennsylvania Community Action, Inc.

Community Action Committee of Lehigh Valley

Community Action Partnership of Mercer County, Inc.

Community Action Partnership for Somerset County – Tableland Services

Northern Tier Community Action Corporation

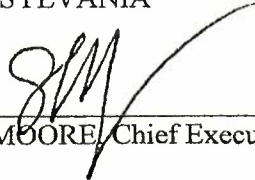
South Central Community Action Program, Inc.

Warren/Forest Counties Economic Opportunity Council

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**

Joint Petition for Consolidation of Proceedings	:	Docket Nos.	M-2020-3020820
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And Conservation Plan of Metropolitan Edison	:		M-2020-3020822
Company, Pennsylvania Electric Company,	:		M-2020-3020823
Pennsylvania Power Company, and West Penn	:		
Power Company	:		

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:

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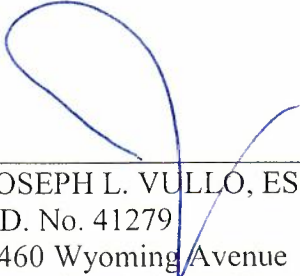
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