



December 15, 2021

Via Electronic Filing

Rosemary Chiavetta, Secretary
PA Public Utility Commission
P.O. Box 3265
Harrisburg, PA 17105-3265

Re: Philadelphia Gas Works Universal Service and Energy Conservation Plan for 2023-2027 Docket No. M-2021-3029323

Dear Secretary Chiavetta,

Enclosed for electronic filing please find the Petition to Intervene of Tenant Union Representative Network in the above captioned matters. Copies are being served as set forth in the attached Certificate of Service.

Respectfully Submitted,

Kintésia S. Scott
Counsel for TURN

Cc: Service List

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

Philadelphia Gas Works Universal Services :
and Energy Conservation Plan for : Docket No. M-2021-3029323
2023-2027 :
:
:

**PETITION TO INTERVENE
OF TENANT UNION REPRESENTATIVE NETWORK**

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December 15, 2021

Counsel for TURN

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Philadelphia Gas Works Universal Services :
and Energy Conservation Plan for : Docket No. M-2021-3029323
2023-2027 :
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PETITION TO INTERVENE OF TENANT UNION REPRESENTATIVE NETWORK

Tenant Union Representative Network (TURN), through counsel Community Legal Services, Inc., hereby files this Petition to Intervene in the above-captioned proceeding, pursuant to the provisions of the Rules of Practice and Procedure of the Pennsylvania Public Utility Commission (PUC or Commission), 52 Pa. Code §§ 5.71-5.76, and in support, states as follows:

1. Petitioner TURN is a Philadelphia-based consumer membership and advocacy organization, which advocates on behalf of low and moderate income residential tenants, many of whom are customers of or reliant upon the services of the Philadelphia Gas Works. TURN is located at 100 South Broad Street, Suite 800, Philadelphia, PA 19110.

2. Petitioner is represented by

Kintéshia S. Scott, Esq. (Pa. ID 328600)
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3. The Respondent utility is:

Philadelphia Gas Works
800 West Montgomery Avenue
Philadelphia, PA 19122

4. On October 29, 2021, Philadelphia Gas Works (PGW) submitted its Universal Service and Energy Conservation Plan for the period 2023 - 2027 (USECP).
5. The Commission's Regulations provide that "a petition to intervene may be filed by a person claiming a right to intervene or an interest of such nature that intervention is necessary or appropriate to the administration of the statute under which the proceeding is brought." 52 Pa. Code § 5.72(a).
6. The Commission's Regulations permit intervention by persons claiming "an interest which may be directly affected and which is not adequately represented by existing participants, and as to which the petitioner may be bound by the action of the Commission in the proceeding." 52 Pa. Code § 5.72(a)(2).
7. In Pennsylvania, an association may have standing as a representative of its members, provided the organization has at least one member who has or will suffer a direct, immediate, and substantial injury to an interest as a result of the challenged action. The Commission has previously determined that a not-for-profit organization may have standing in a representational capacity, including both associations and not-for-profit corporations. PPL Electric Utilities Corporation's Universal Service and Energy Conservation Plan for 2011-2013, Docket No. M-2010-2179796, Opinion and Order dated May 5, 2011 at 11.
8. TURN is a not-for-profit advocacy organization composed of moderate and low income tenants, many of whom are either customers of PGW or dependent on gas service from PGW. In those capacities, they have a direct, immediate, substantial and distinct interest in the impact of PGW's universal service and energy conservation program offerings.

9. In this proceeding, TURN seeks to further explore potential and/or proposed changes to PGW's universal service programs, including, but not limited to, PGW's Customer Responsibility Program (CRP) program; PGW's hardship fund program; PGW's Low Income Usage Reduction Program (LIURP); and, the program components and operation of the various pilot programs including the proposed "Repair and Renew" Pilot Program. TURN reserves the right to examine any other issues that arise in the course of this proceeding.
10. The effectiveness of PGW's universal service and energy conservation program offerings is of critical importance to the moderate and low income PGW residential customers who are members of TURN. Petitioner TURN therefore has interests in this proceeding, which may be directly affected and which are not adequately represented by other participants, and as to which Petitioner may be bound by the action of the Commission in this proceeding.

WHEREFORE, TURN respectfully requests that the Commission grant this Petition to Intervene providing TURN with full-party status in this proceeding.

Respectfully submitted,



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VERIFICATION

I, Nicole Lawrence, 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 18 Pa.C.S. § 4904 (relating to unsworn falsification to authorities).

Date: December 15, 2021


Title: Executive Director, TURN

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CERTIFICATE OF SERVICE

I hereby certify that this day I served a copy of the Tenant Union Representative Network's Petition to Intervene upon the persons listed below in the manner indicated in accordance with the requirements of 52 Pa. Code § 1.54.

Via Email Only

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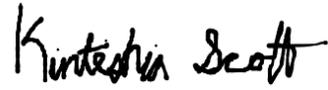
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Respectfully Submitted,

Handwritten signature of Kinteshia Scott in black ink.

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