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February 14, 2023

**VIA ELECTRONIC FILING**

Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street  
Harrisburg, PA 17120

RE: Joint Universal Service & Energy Conservation Plan of Metropolitan Edison Company, Pennsylvania Electric Company, Pennsylvania Power Company, and West Penn Power Company for Years 2024 - 2028; Docket No. M-2022-3036532;  
**PETITION TO INTERVENE OF THE PENNSYLVANIA COALITION OF LOCAL ENERGY EFFICIENCY CONTRACTORS**

Dear Secretary Chiavetta:

Enclosed for filing with the Commission is the Petition to Intervene of the Pennsylvania Coalition of Local Energy Efficiency Contractors ("PA-CLEEC") in the above-captioned docket. Copies of this Petition have been served in accordance with the attached Certificate of Service.

Thank you for your attention to this matter. If you have any questions related to this filing, please do not hesitate to contact my office.

Very truly yours,

Todd S. Stewart  
*Counsel for the Pennsylvania Coalition of  
Local Energy Efficiency Contractors*

TSS/jld  
Enclosure

cc: Rosemary Chiavetta, Secretary (via efile Letter and COS only)  
Per Certificate of Service

## CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the foregoing document upon the parties, listed below, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a party).

### VIA ELECTRONIC MAIL ONLY

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Todd S. Stewart

DATED: February 14, 2023

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Joint Universal Service & Energy :  
Conservation Plan of Metropolitan Edison :  
Company, Pennsylvania Electric Company, : Docket No. M-2022-3036532  
Pennsylvania Power Company, and West :  
Penn Power Company for Years 2024 - 2028 :

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**PETITION TO INTERVENE  
OF THE PENNSYLVANIA COALITION OF LOCAL  
ENERGY EFFICIENCY CONTRACTORS**

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NOW COMES, The Pennsylvania Coalition of Local Energy Efficiency Contractors (“PA-CLEEC”), and hereby petitions the Pennsylvania Public Utility Commission (“Commission”) to intervene in the above-captioned proceeding pursuant to 52 Pa. Code §5.71. *et. seq.* As discussed more fully below, PA-CLEEC is a trade association of energy efficiency contractors that provide services in the service territories of Metropolitan Edison Company, Pennsylvania Power Company, Pennsylvania Electric Company and West Penn Power Company (“Companies”). PA-CLEEC was formed to represent the interests of these local energy efficiency contractors in proceedings before the Commission.<sup>1</sup> In support of its Petition to Intervene, PA-CLEEC states and aver as follows:

1. On or about November 1, 2022, the Companies filed their Joint Universal Service & Energy Conservation Plan of Metropolitan Edison Company, Pennsylvania Power Company,

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<sup>1</sup> The positions expressed in this filing represent the position of CLEEC as an organization but may not represent the views of any particular member of the Coalition.

Pennsylvania Electric Company and West Penn Power Company for Years 2024-2028, (“Plan”) at the above-captioned docket.

2. The stated goals of the Universal Service and Energy Conservation Programs are to: 1) protect consumer health and safety by helping low income households maintain affordable utility service; 2) provide affordable utility service by making payment assistance available to low-income customers; 3) help low-income customers conserve energy and reduce residential utility bills; and, 4) ensure that the programs are operated in a cost-effective and efficient manner.

3. PA-CLEEC, is represented in the above-captioned matter by the following counsel:

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4. PA-CLEEC is a non-profit entity composed of local community-based contractors, specializing in the delivery of field work for public utility Universal Service Energy Conservation Plans that benefit low-income customers. Among other issues, PA-CLEEC advocates for the utility use of fair and transparent request for proposal processes to award contracts to vendors. PA-CLEEC also advocates for sufficient funding to ensure that vital programs can continue to provide the efficacious results that customers and the Commission should expect. PA-CLEEC continues to review the Companies’ Plan and has not developed its positions on the proposals contained therein but will provide those positions at the appropriate times as this proceeding progresses. At a minimum, PA-CLEEC seeks the approval of a plan that provides the best results for customers, at the lowest cost, using locally based resources, including contractors who are familiar with the regions and customers they serve.

5. The Commission’s regulations at 52 Pa. Code § 5.72(a)(2) establish the standard for eligibility to participate in a matter before the Commission as having 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.” PA-CLEEC has standing to participate in this matter because its members provide vital services to low-income customers on the Companies’ systems, and those services are funded and directed through the implementation and operationalization of the Plan. Its members will be directly impacted by any Commission decision in this case and there is no other entity that can represent or does represent the unique interests of its members. Accordingly, PA-CLEEC’s Petition to Intervene should be granted.

WHEREFORE, PA-CLEEC respectfully requests that the Presiding Administrative Law Judge and/or the Commission, grant their Petition to Intervene in the above-captioned matter and provide them will full-party status in this proceeding.

Respectfully submitted,



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