



April 26, 2024

Via Efiling

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

**Re: Pennsylvania Public Utility Commission v. PECO Energy Company - Gas
Division, Docket No. R-2024-3046932**

Dear Secretary Chiavetta:

Enclosed for electronic filing please find the Petition to Intervene of the Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania (CAUSE-PA) in the above-referenced case.

Sincerely,

/s/ Charlotte Edelstein

Charlotte E. Edelstein, Esq.
Attorney ID No. 334505

Enclosures

Cc: Certificates of Service

5. 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).
6. 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. See PPL Electric Utilities Corporation's Universal Service and Energy Conservation Plan for 2011-2013, Docket No. M-2010-2179796 (internal citations omitted).
7. 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. Petitions to intervene shall be filed no later than the date fixed for filing protests as published in the Pennsylvania Bulletin except for good cause shown. 52 Pa. Code §5.74(b)(2). CAUSE-PA timely submits this petition.
9. CAUSE-PA is an unincorporated association of low-income individuals that advocates on behalf of its members to enable consumers of limited economic means to connect to and maintain affordable water, electric, heating, and telecommunication services.
10. Members of CAUSE-PA will be directly affected by the outcome of this proceeding.
11. CAUSE-PA is located c/o the Pennsylvania Legal Aid Network, at 118 Locust Street, Harrisburg, PA 17101.

12. Intervenor was a party in prior Commission proceedings involving PECO, including, but not limited to, the following:

- a. PECO Energy Company 2022 Base Rate Case, Docket No. R-2022-3031113;
- b. PECO Energy Company 2020 Base Rate Case, Docket No. R-2020-3018929;
- c. In the Matter of PECO Energy Company Universal Service and Energy Conservation Plan for 2019-2024 Submitted in Compliance with 52 Pa. Code §§ 54.74 and 62.4, Docket No. M-2018-3005795;
- d. In the Matter of PECO Energy Company Universal Service and Energy Conservation Plan for 2016-2018 Submitted in Compliance with 52 Pa. Code §§ 54.74 and 62.4, Docket No. M-2015-2507139; and
- e. In the Matter of PECO Energy Company Universal Service and Energy Conservation Plan for 2013-2015 Submitted in Compliance with 52 Pa. Code §§ 54.74 and 62.4, Docket No. M-2012-2290911.

Intervenor has a continuing interest in the impact of PECO's gas base rate filing on moderate- and low-income residential customers.

13. PECO's gas base rate filing is of critical importance to the low-income PECO residential customers and consumers who are members of CAUSE-PA. Intervenor therefore has interests in this proceeding, which may be directly affected and which are not adequately represented by other participants, and as to which the petitioners may be bound by the action of the Commission in this proceeding.

14. Intervenor has preliminarily reviewed PECO's rate filing, and has tentatively identified the following issues:

- a. Whether a rate increase will result in unjust and unreasonable rates for PECO's low-income residential customers;
- b. Whether a rate increase is justified given the quality of PECO's customer service;
- c. Whether PECO's proposed residential relief program effectively mitigates the impact of the proposed rate increase on those customers;
- d. Whether PECO's proposed expanded customer outreach and education plan is sufficient and appropriately targeted;
- e. Whether PECO's proposed Weather Normalization Program is appropriate;
- f. Whether PECO's universal service program rules, policies and practices have been successful in mitigating the impact of PECO's high rates on low-income customers;
- g. Whether PECO's proposed allocation of universal service program costs is reasonable; and
- h. Whether PECO's termination practices, payment agreement requirements, and collections policies have impeded access to service.

Intervenor reserves the right to examine any other issues that arise in the course of this proceeding.

15. Intervenor is represented by:

Charlotte E. Edelstein, Esquire
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16. Counsel for Intervenor consent to the service of documents by electronic mail to the email addresses of counsel listed above, as provided in 52 Pa. Code §1.54(b)(3).

WHEREFORE, CAUSE-PA respectfully requests that the Public Utility Commission enter an order granting CAUSE-PA full status as intervener in this proceeding with active party status and grant such other relief as is just and appropriate.

Respectfully submitted,

/s/ Vikram Patel, Esq.

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April 25, 2024

VERIFICATION

I, Vikram Patel, on behalf of the Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania (CAUSE-PA) 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: April 25, 2024

A handwritten signature in black ink, appearing to read 'Vikram Patel', is written over a solid horizontal line.

Vikram Patel

Counsel for CAUSE-PA

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission
v.
PECO Energy Company - Gas Division

Docket No. R-2024-3046932

Certificate of Service

I hereby certify that I have this day served copies of the Petition to Intervene of the Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania upon the parties of record in the above captioned proceeding in accordance with the requirements of 52 Pa. Code § 1.54.

VIA ELECTRONIC MAIL

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April 26, 2024

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