

# BURKE VULLO REILLY ROBERTS

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February 13, 2025

**via Electronic Filing**

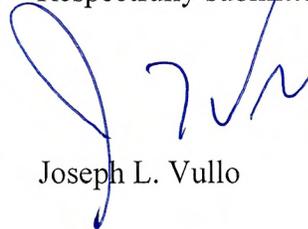
Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
400 North Street, Filing Room  
Harrisburg, PA 17120

RE: Pennsylvania Public Utility Commission v.  
UGI Utilities-Gas Division  
Docket No. R-2024-3052716

Dear Secretary Chiavetta:

Please accept for filing the Commission on Economic Opportunity'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/ma  
encl.

cc: All Parties of Record

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

PENNSYLVANIA PUBLIC UTILITY	:	
COMMISSION, ET AL.	:	
	:	
V.	:	R-2024-3052716
	:	
UGI UTILITIES, INC. – GAS DIVISION	:	

**PETITION TO INTERVENE**

NOW COMES, the Commission on Economic Opportunity (CEO), by and through counsel, Joseph L. Vullo, Esquire, and petitions to intervene in the above-captioned matter averring as follows:

1. The Petitioner, Commission on Economic Opportunity, is a not-for-profit corporation organized and existing under the laws of the Commonwealth of Pennsylvania with its principal office located at 165 Amber Lane, P.O. Box 1127, Wilkes-Barre, Luzerne County, Pennsylvania, 18703-1127. CEO’s telephone number is (570) 826-0510.
2. CEO is an advocate for its clients - the low-income population of Luzerne County - and has been directly involved in assuring that low income persons’ utility costs are contained through counseling, advice, payment assistance and energy conservation measures.
3. CEO seeks permission to intervene in UGI Utilities, Inc. – Gas Division’s request for a rate increase filed with the Commission.
4. UGI Utilities, Inc. – Gas Division serves customers in numerous counties including Luzerne County.

5. CEO seeks permission to intervene in UGI Utilities, Inc. – Gas Division’s request for a rate increase not only to address the proposed increase but to ensure the adequacy of the Company’s programs for its low-income customers and the effect of any proposed increase on those programs and customers.

6. CEO’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 utility rates remain affordable for its clients and to ensure that its low income programs remain adequately funded and available. Accordingly, CEO’s participation in this proceeding will serve the public interest.

7. Because CEO represents low-income citizens in Luzerne County, the interests of its clients are not being protected by any other party to this action.

**POSITIONS**

8. CEO reserves the right to set forth its position on the proposed rate increase. CEO’s main purpose is to address the adequacy of the Company’s low-income programs, and the effect of any proposed rate increase on those programs.

9. There is a substantial public interest in keeping utility costs affordable for all members of the community and any increase in rates should be accompanied by an increase in funding available to the Company’s low-income programs so that its rates remain just and reasonable across all customer classes.

10. CEO expects to address the any proposed change in rate structure that would impact upon the motive and ability of low-income customers to reduce their monthly bills through conservation.

11. CEO has been an active participant in this Company's prior requests for rate increases.

**REQUEST FOR RELIEF**

WHEREFORE, the Commission on Economic Opportunity respectfully requests that the Commission:

1. Receive for filing and docket this Petition to Intervene in order that CEO be a party to such proceedings and be placed on all service lists.

2. Grant to CEO active party status with the right to participate in all proceedings relative to this matter.

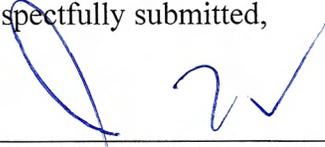
3. Order that the following be designated as CEO's recipients for service:

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4. Order that each party to the proceedings provide CEO's designated recipients with copies of all papers filed.

5. Grant such other relief as the Commission may deem necessary and proper.

Respectfully submitted,



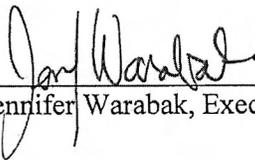
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**VERIFICATION**

I, Jennifer Warabak, Executive Director of Commission on Economic Opportunity, 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.

COMMISSION ON ECONOMIC  
OPPORTUNITY

  
\_\_\_\_\_  
Jennifer Warabak, Executive Director

Dated: 7/13/2020

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

PENNSYLVANIA PUBLIC UTILITY COMMISSION, ET AL.	:	
	:	
V.	:	R-2024-3052716
	:	
UGI UTILITIES, INC. – GAS DIVISION	:	

**CERTIFICATE OF SERVICE**

The undersigned certified that he served a copy of the foregoing Petition to Intervene upon the following participants by via electronic mail on the 13<sup>rd</sup> day of February, 2025:

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