



December 2, 2025

Via Electronic Filing

Secretary Matthew Homsher
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17120

Re: Petition of PECO Energy Company for Approval of Its Act 129 Phase V Energy Efficiency and Conservation Plan, Docket No. M-2025-3057328

Petition to Intervene of TURN

Dear Secretary Homsher,

Enclosed for electronic filing please find the **Petition to Intervene of the Tenant Union Representative Network (“TURN”)** in the above captioned matter.

A copy of this Petition is being served via email, as indicated on the attached Certificate of Service.

Sincerely,

Charlotte Edelstein
Counsel for TURN
Community Legal Services, Inc.

Encl. Certificate of Service

Cc: Office of Administrative Law Judge (via email only: crainey@pa.gov)
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BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

Petition of PECO Energy Company :
For Approval of its Act 129 Phase V :
Energy Efficiency and Conservation Plan : Docket No. M-2025-3057328
:
:

CERTIFICATE OF SERVICE

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

VIA EMAIL

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Counsel for TURN

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

COMMUNITY LEGAL SERVICES

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PETITION TO INTERVENE OF TENANT UNION REPRESENTATIVE NETWORK

The 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 thereof, states as follows:

1. In accordance with the applicable provisions of Act 129 of 2008¹ (Act 129), the Commission is charged with developing an energy efficiency and conservation program (EE&C Program).
2. Act 129 requires Electric Distribution Companies (EDCs) with 100,000 or more customers to develop and file an energy efficiency and conservation plan (EE&C Plan), subject to approval by the Commission, to reduce electric consumption.
3. Pursuant to its EE&C Program, the Commission is tasked with approving EE&C Plans and developing procedures and standards to ensure each EDC has complied with the requirements of the EE&C Program, its EE&C Plan, and satisfied the established energy efficiency (EE) and peak demand reduction (PDR) targets.

¹ 66 Pa. C.S. §§2806.1-2806.2.

4. Pursuant to Public Utility Code Section 2806.1(c)(3), the Commission is also charged with the responsibility to evaluate the costs and benefits of the EE&C Program by November 30, 2013, and every five years thereafter.
5. To date, the Commission has implemented four phases of the Act 129 EE&C Program.
6. On June 18, 2025, after review and consideration of comments and reply comments of Companies and other interested parties, the Commission issued its EE&C Program Phase V Implementation Order (Implementation Order), which directed the Phase V EE&C Program to operate from June 1, 2026, through May 31, 2031, and prescribed further energy consumption and PDR targets.
7. On December 1, 2025, PECO Energy Company (PECO or the Company) filed its Petition for Approval of its Act 129 Phase V Energy Efficiency and Conservation Plan (PECO EE&C Plan) at the above-captioned docket.
8. In its Implementation Order, the Commission established a savings carve-out for low-income customers with the aim of helping to ensure that low-income customers are able to access, participate in, and realize benefits from efficiency programs.
9. In the Implementation Order, the Commission directed that PECO obtain 74,456 MWh of savings from programs solely directed at low-income customers or low-income verified participants in multifamily housing.
10. PECO's EE&C Plan includes EE programs for "low-income sector" customers, defining low-income as being at or below 150% of the Federal Poverty Income Guidelines.
11. 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).

12. 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).
13. 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. PPL Electric Utilities Corporation’s Universal Service and Energy Conservation Plan for 2011-2013, Docket No. M-2010-2179796 (internal citations omitted). 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.
14. Tenant Union Representative Network (“TURN”) is a not-for-profit advocacy organization composed of moderate and low-income tenants, all either customers of or dependent on electric service from PECO Energy Company.
15. In those capacities, TURN and its members have a direct, immediate, substantial, and distinct interest in PECO’s EE&C Plan, as the Company seeks to implement measures to achieve established EE and PDR targets for residential and low-income consumers, including those who are tenants, in accordance with the requirements of Act 129 and the Implementation Order.

16. TURN is located at 100 South Broad Street, Suite 800, Philadelphia, PA 19110.
17. TURN and its members have a continuing interest in the impact that the Company's proposed EE&C Program will have on moderate or low-income residential customers who are tenants. These interests are not adequately represented by other participants.
18. TURN has preliminarily reviewed PECO's filing and has tentatively identified the following issues:
 - a. Whether PECO's EE&C Plan will serve to adequately address the needs of low-income residential customers as it relates to the Company's deployment of EE and PDR measures to meet established targets for low-income customers in accordance with the requirements of Act 129 and the Implementation Order.
 - b. Whether PECO's proposed EE&C Program measures are adequately funded and available to low-income Philadelphia tenants, including tenants who may reside in multi-family dwellings where PECO has proposed to offer energy efficiency and peak demand reduction measures.
19. TURN reserves the right to examine any other issues that arise in the course of this proceeding.
20. TURN is represented by:

Joline R. Price, Esq. (Attorney ID: 315405)
Benjamin Clark, Esq. (Attorney ID: 335697)
Charlotte Edelstein, Esq. (Attorney ID: 334505)
Robert W. Ballenger, Esq. (Attorney ID: 93434)

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21. Counsel for TURN 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, TURN respectfully requests that the Commission enter an order granting TURN full status as an intervener in this proceeding with active party status.



Charlotte Edelstein, Esq. (Attorney ID: 334505)
Joline R. Price, Esq. (Attorney ID: 315405)
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Counsel for TURN

December 2, 2025

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 manner. I understand that the statements herein are made subject to the penalties of 18 Pa. C.S. § 4904 (relating to unsworn falsification to authorities).

December 2, 2025

A handwritten signature in black ink that reads "Nicole Lawrence". The signature is written in a cursive style and is positioned above a horizontal line.

Nicole Lawrence
Executive Director
Tenant Union Representative
Network