

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of Philadelphia Gas Works for Approval of Demand-Side Management Plan for FY 2016-2020	:	
	:	Docket No. P-2014-2459362
	:	
And	:	
	:	
Philadelphia Gas Works Universal Service and Energy Conservation Plan for 2014- 2016 52 Pa Code § 62.4 – Request for Waivers	:	

**PETITION TO INTERVENE OF TENANT UNION REPRESENTATIVE NETWORK AND
ACTION ALLIANCE OF SENIOR CITIZENS OF GREATER PHILADELPHIA**

The Tenant Union Representative Network (“TURN”) and Action Alliance of Senior Citizens of Greater Philadelphia (Action Alliance), through counsel Community Legal Services, Inc., hereby file 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, state as follows:

1. The Petitioners are Philadelphia based consumer membership and advocacy organizations, Tenant Union Representative Network (TURN) and Action Alliance of Senior Citizens of Greater Philadelphia (Action Alliance) (hereinafter collectively “TURN et al.”), who advocate on behalf of low and moderate income residential customers and consumers of the utility services of the Philadelphia Gas Works.
2. Petitioners are represented by:

Josie B. H. Pickens, Esquire (Attorney ID: 309422)
Robert W. Ballenger, Esquire (Attorney ID: 93434)
Thu B. Tran, Esquire (Attorney ID: 83086)

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3. The Respondent utility is:

Philadelphia Gas Works
800 West Montgomery Avenue
Philadelphia, PA 19122

4. On December 23, 2014 Philadelphia Gas Works (PGW) filed its second Demand-Side Management Plan (DSM Phase II Plan). In the DSM Phase II Plan, PGW submitted a proposed schedule for this proceeding, which established a due date of January 12, 2015 for answers/interventions.
5. The petitioner Tenant Union Representative Network (“TURN”) is a not-for-profit advocacy organization composed of moderate and low income tenants, a substantial number of whom are customers of PGW or dependent on PGW natural gas service and all residing in Philadelphia, PA. In those capacities, they have a direct, immediate, substantial and distinct interest in the proposed PGW Demand-Side Management Plan. TURN is located at 1315 Walnut Street, Philadelphia, PA 19107.
6. The petitioner Action Alliance of Senior Citizens of Greater Philadelphia (“Action Alliance”) is a not-for-profit membership organization of senior citizens, many of whom are Philadelphia taxpayers, residents and customers of PGW, on which they rely for their

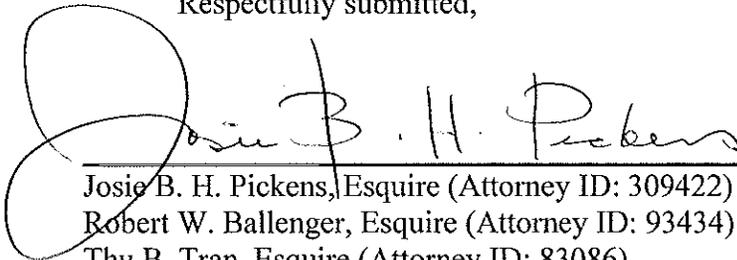
natural gas service needs. In those capacities, they have a direct, immediate, substantial and distinct interest in the proposed PGW Demand-Side Management Plan.

7. The petitioners were a party to the settlement of the base rate filing made by PGW in December 2009, which resulted in the creation of Phase I of PGW's Demand-Side Management Program at Docket Nos. P-2009-2097639 and R-2009-2139884.
8. PGW's DSM Phase II Plan proposes a more than \$19 million reduction in spending for PGW's Demand-Side Management programs, from approximately \$44.1 million in Phase I to a proposed \$25 million in Phase II. This includes a reduction in spending for PGW's CRP Home Comfort program (formerly referred to as ELIRP), which provides weatherization treatments to the highest usage customers in PGW's Customer Assistance Program, which is known as the Customer Responsibility Program (CRP). PGW also proposes to phase out its Home Rebates program, which provides incentives to single-family residential customers for implementing conservation projects in their homes. PGW submits that reductions in the cost of its Demand-Side Management program are necessary because of loss of revenue allegedly resulting from energy reductions due to PGW DSM Phase I programming activities. PGW further submits that the CRP Home Comfort program has been the greatest contributor to its reduced delivery charges.
9. PGW also proposes to offer a pilot program to serve low-income multifamily properties within its low-income usage reduction program.
10. The subject matter of PGW's DSM Phase II Plan is critical to the low income PGW residential customers who are members of TURN et al., who stand to benefit from a robust suite of energy efficiency programs that can effectively reduce household consumption and ultimately increase the affordability of gas bills. PGW's proposed

reduction in spending for its low-income offerings is of particular concern to TURN et al. members. The petitioners therefore have 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.

Wherefore, TURN et al. respectfully request that the Pennsylvania Public Utility Commission grant this Petition to Intervene providing TURN et al. with full-party status in this proceeding.

Respectfully submitted,

A handwritten signature in black ink, reading "Josie B. H. Pickens". The signature is written in a cursive style with a large, looping initial "J".

Josie B. H. Pickens, Esquire (Attorney ID: 309422)

Robert W. Ballenger, Esquire (Attorney ID: 93434)

Thu B. Tran, Esquire (Attorney ID: 83086)

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January 12, 2015

VERIFICATION

I, Phil Lord, 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 10 Pa.C.S. § 4904 (relating to unsworn falsification to authorities).

Date: January 12, 2015

A handwritten signature in cursive script that reads "Phil Lord".

Title: Executive Director, TURN