

BURKE VULLO REILLY ROBERTS

ATTORNEYS AT LAW

1460 Wyoming Avenue
Forty Fort, PA 18704
Phone (570) 288-6441 + Fax (570) 288-4598

*Formerly Burke & Burke
Thomas F. Burke, Sr. (1932-1972)*

www.bvrrlaw.com

JOSEPH L. VULLO
jlvullo@bvrrlaw.com

September 26, 2018

Honorable Benjamin Myers
Pennsylvania Public Utility Commission
Office of Administrative Law Judge
P.O. Box 3265
Harrisburg, PA 17105-3265

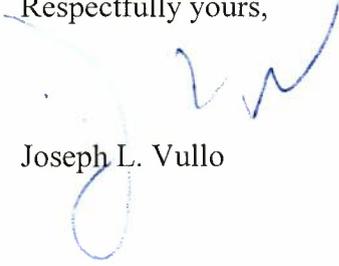
RE: Petition of UGI Utilities, Inc. – Electric Division for Approval of Phase III
of its Energy Efficiency and Conservation Plan
Docket No. M-2018-3004144

Dear Judge Myers:

Enclosed please find the Petition to Intervene which was filed on behalf of my client, the Commission on Economic Opportunity, on today's date. Copies of the Petition are being provided to all parties of record.

If you need anything further, please do not hesitate to contact me..

Respectfully yours,



Joseph L. Vullo

JLV/jar
encl.

cc: All Parties of Record

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Petition of UGI Utilities, Inc. – Electric :
Division for Approval of Phase III of its : Docket No. M-2018-3004144
Energy Efficiency and Conservation Plan :

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. – Electric Division's Petition for Approval of Phase III of its Energy Efficiency and Conservation Plan filed with the Commission.

4. UGI Utilities, Inc. – Electric Division serves customers in numerous counties including Luzerne County.

5. CEO seeks permission to intervene in the Company's request for approval of its Energy Efficiency and Conservation Plan to ensure the adequacy of the Company's proposed program for its low-income 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 the Company's proposed program provides services to its low income customers. 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.

8. CEO previously participated in the PUC's proceeding to determine Act Phase III requirements (M-2014-2424864) in which the Commission decided that 5.5% of savings must come from specific low-income programs, provided to verifiable low-income customers, to include a percentage of savings from direct install measures.

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.

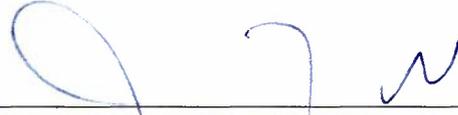
3. Order that the following individual be designated as CEO's recipient for service:

Joseph L. Vullo, Esquire
1460 Wyoming Avenue
Forty Fort, PA 18704
Phone: (570) 288-6441
Fax: (570) 288-4598
e-mail: jlvullo@bvrrlaw.com

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

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

Respectfully submitted,



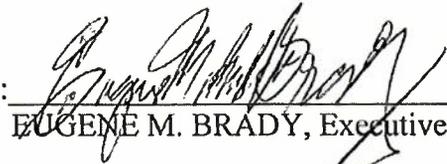
JOSEPH L. VULLO, ESQUIRE
Burke Vullo Reilly Roberts
1460 Wyoming Avenue
Forty Fort, PA 18704
(570) 288-6441
e-mail: jlvullo@bvrrlaw.com

VERIFICATION

I, EUGENE M. BRADY, 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

BY:


EUGENE M. BRADY, Executive Director

Dated: _____

9/20/18

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Petition of UGI Utilities, Inc. – Electric :
Division for Approval of Phase III of its : Docket No. M-2018-3004144
Energy Efficiency and Conservation Plan :

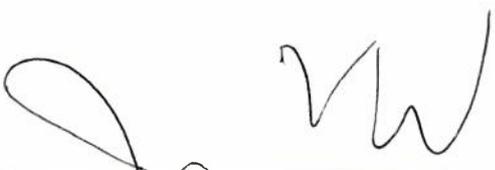
CERTIFICATE OF SERVICE

The undersigned certified that he served a copy of the foregoing Petition to Intervene upon the following participants this 26th day of September, 2018, via first-class mail and electronic mail:

Devin T. Ryan, Esquire
Post & Schell, P.C.
17 North Second Street
12th Floor
Harrisburg, PA 17101-1601

Christy Appleby, Esquire
Office of Consumer Advocate
555 Walnut Street – 5th Floor
Forum Place
Harrisburg, PA 17101

Steven C. Gray, Esquire
Office of Small Business Advocate
Commerce Building, Suite 202
300 North Second Street
Harrisburg, PA 17101



JOSEPH L. VULLO, ESQUIRE
Burke Vullo Reilly Roberts
1460 Wyoming Avenue
Forty Fort, PA 18704
(570) 288-6441
e-mail: jlvullo@aol.com
Attorney for Commission on Economic
Opportunity