

Republic of the Philippines
ENERGY REGULATORY COMMISSION
San Miguel Avenue, Pasig City

IN THE MATTER OF THE APPLICATION FOR APPROVAL OF RATES UNDER THE RULES FOR SETTING ELECTRIC COOPERATIVE'S WHEELING RATES (RSEC-WR), WITH PRAYER FOR THE ISSUANCE OF A PROVISIONAL AUTHORITY	
Bukidnon Electric Cooperative, Inc (BUSECO)	
Pampanga I Electric Cooperative, Inc (PELCO I)	ERC Case No.2009-065RC
First Bukidnon Electric Cooperative, Inc (FIBECO)	ERC Case No 2009-066RC
Cebu II Electric Cooperative, Inc (CEBECO II)	ERC Case No 2009 068RC
Cebu I Electric Cooperative, Inc (CEBECO I)	ERC Case No 2009-069RC
Cebu III Electric Cooperative, Inc (CEBECO III)	ERC Case No 2009-070RC
Misamis Oriental II Electric Cooperative, Inc (MORESCO II)	ERC Case No 2009-071RC
Aurora Electric Cooperative, Inc (AURELCO)	ERC Case No 2009-072RC
Cagayan I Electric Cooperative, Inc (CAGELCO I)	ERC Case No 2009-073RC
Biliran Electric Cooperative, Inc (BILECO)	ERC Case No 2009-076RC
Pampanga Rural Electric Service Cooperative, Inc (PRESCO)	ERC Case No 2009-077RC
Camarines Sur I Electric Cooperative, Inc (CASURECO I)	ERC Case No 2009-079RC
Zamboanga Del Sur I Electric Cooperative, Inc (ZAMSURECO I)	ERC Case No 2009-081RC
Pampanga II Electric Cooperative, Inc (PELCO II)	ERC Case No 2009-082RC
Ilocos Sur Electric Cooperative, Inc (ILECO)	ERC Case No 2009-086RC
Quirino Electric Cooperative, Inc (QUIRELCO)	ERC Case No 2009-088RC
Agusan Del Norte Electric Cooperative, Inc (ANECO)	ERC Case No 2009-089RC
Negros Oriental II Electric Cooperative, Inc (NORECO II)	ERC Case No 2009-090RC
Samar I Electric Cooperative, Inc (SAMELCO I)	ERC Case No 2009-091RC
Surigao Del Sur I Electric Cooperative, Inc (SURSECO I)	ERC Case No 2009-092RC
La Union Electric Cooperative, Inc (LUELCO)	ERC Case No 2009-093RC
Cagayan II Electric Cooperative, Inc (CAGELCO II)	ERC Case No 2009-094RC
Pangasinan III Electric Cooperative, Inc (PANELCO III)	ERC Case No 2009-095RC
Nueva Ecija II Electric Cooperative, Inc (NEECO II Area II)	ERC Case No 2009-096RC
Bohol I Electric Cooperative, Inc (BOHECO I)	ERC Case No 2009-097RC
Nueva Ecija I Electric Cooperative, Inc (NEECO I)	ERC Case No 2009-098RC
Abra Electric Cooperative, Inc (ABRECO)	ERC Case No 2009-099RC
Sorsogon II Electric Cooperative, Inc (SORECO II)	ERC Case No 2009-100RC
Kalinga Apayao Electric Cooperative, Inc (KAELCO)	ERC Case No 2009-101RC
Camiguin Electric Cooperative, Inc (CAMELCO)	ERC Case No 2009-102RC
Peninsula Electric Cooperative, Inc (PENELCO)	ERC Case No 2009-103RC
	ERC Case No 2009-104RC

Albay Electric Cooperative, Inc (ALECO)	ERC Case No 2009-106RC
Isabela I Electric Cooperative, Inc (ISELCO)	ERC Case No 2009-107RC
Leyte III Electric Cooperative, Inc (LEYTE III)	ERC Case No 2009-108RC
Negros Occidental Electric Cooperative, Inc (NOCECO)	ERC Case No 2009-109RC
Leyte II Electric Cooperative, Inc (LEYECO II)	ERC Case No 2009-110RC
Surigao Del Norte Electric Cooperative, Inc (SURNECO)	ERC Case No 2009-111RC
San Jose Electric Cooperative, Inc (SAJELCO)	ERC Case No 2009-112RC
Tarlac I Electric Cooperative, Inc (TARELCO)	ERC Case No 2009-113RC
	ERC Case No 2009-114RC
<i>Applicants</i>	
X-----X	

OMNIBUS PETITION FOR INTERVENTION

The National Association of Electricity Consumers for Reforms, Inc. (Nasecore), represented by its President, Pete L. Ilagan, respectfully petitions this Honorable Commission to grant it leave to intervene in the instant applications and respectfully states: That -

1. This action is aimed at contesting the application for the *Approval of Rates under the Rules for Setting Electric Cooperative's Wheeling Rates (RSEC-WR)*, with *Prayer for the Issuance of a Provisional Authority* filed by all electricity cooperative adopting the RSEC-WR.
2. Intervenor National Association of Electricity Consumers for Reforms (NASECORE) is a non-stock and non-profit corporation duly organized and existing under the laws of the Republic of the Philippines, with office address at No. 10 Bayside Court Compound, 680 Quirino Avenue, Tambo, Parañaque City, represented herein by its duly authorized President, Mr. Pete L. Ilagan, and hereinafter referred to as "Nasecore".
3. Nasecore is an organization whose objective is to promote, advance and protect the interest of ordinary electricity consumers as its members. Any adjustment in the rates of applicant will obviously affect the monthly electric bills of the residential customers.
4. Thus, it has a legal and substantial interest in the instant *Application* and are so situated as to be adversely affected by the *Approval of Rates under*

the Rules for Setting Electric Cooperative's Wheeling Rates (RSEC-WR), with Prayer for the Issuance of a Provisional Authority. It is therefore necessary to evaluate, examine and validate the recoverable costs that electric cooperatives want to adopt under its respective instant *Applications.*

5. If this Honorable Commission will see fit to grant our *Omnibus Petition for Intervention*, the same will not unduly delay the resolution of the instant *Application.*
6. It is requested that this Honorable Commission direct all electric cooperatives, after receipt of this Omnibus Petition, to furnish us copies of its *Application with the complete annexes/attachments as soon as possible before the first scheduled hearing* to allow us sufficient time to evaluate and examine the instant application and consequently, prepare for the hearing of the case.
7. Intervenor also request that this Honorable Commission direct all applicants to furnish Intervenor copy of its annual reports from 2004-2008.

WHEREFORE, for the above reasons, it is respectfully prayed of this Honorable Commission to grant leave to intervene to Nasecore.

Parañaque City for Pasig City, 16 November 2009.

PETE L. ILAGAN
Intervenor

EXPLANATION

A copy of this *Omnibus Petition for Intervention* was served upon applicants counsel by registered mail due to distance and lack of messengers.

PETE L. ILAGAN
Intervenor

Copy furnished:

ATTY. VICAR LOUREEN G. LOFRANCO
Counsel for BUSECO
0118 Florencio Fe St., Heights
8700 Malaybalay City, Bukidnon

Registry Receipt No. _____
_____ Post Office
Date: _____

Registry Receipt No. _____
_____ Post Office
Date: _____

ATTY ARNIDO O. INUMERABLE

405 Elisa St. U.E. Village
Cainta Rizal

ATTY ZENON S. SUAREZ

Room 313 Web-Jet Bldg. No. 64 Quezon Ave.
Corner BMA St., Quezon City

Registry Receipt No. _____
_____ Post Office

Date: _____

SGD. ALAN C. GAVIOLA

A.C. GAVIOLA LAW OFFICE
Rm. 203, 2/F Crown Plaza Bldg.
3rd Ave., North Reclamation Area, Cebu City

Registry Receipt No. _____
_____ Post Office

Date: _____

ATTY DITAS A. LERIOS-AMBOY

Dechavez Sagayo and Lerios-Amboy Law Offices
Unit 1609-1610 Tycoon Center
Pearl Drive Ortigas Center
Pasig City

Registry Receipt No. _____
_____ Post Office

Date: _____

ATTY. MANOLO F. SORIANO

Counsel for SAJELCO
A.O. Pascual St., San Jose City

Registry Receipt No. _____
_____ Post Office

Date: _____

VERIFICATION & CERTIFICATION

PETE L. ILAGAN, of legal age, Filipino, married, with office and postal address at No. 10 Bayside Court Compound, 680 Quirino Avenue, Tambo, Parañaque City, after being sworn, deposes and states: THAT

1. He is the President of the National Association of Electricity Consumers for Reforms, Inc., who had caused the preparation of the foregoing *Omnibus Petition for Intervention* a copy of Secretary's Certificate authorizing Mr. Pete L. Ilagan to file this *Omnibus Petition for Intervention* is attached as Annex "A"
2. He read and fully understood the allegations contained in said *Omnibus Petition for Intervention* and that all the facts therein contained are true and correct based on his personal knowledge and authentic records.
3. He hereby certify that he have not commenced nor caused the commencement of any other action or proceeding involving the issues raised herein before the Regional Trial Court, the Supreme Court, the Court of Appeals or different Divisions thereof, or any other tribunal or agency, and that to the best of his knowledge, no such action or proceedings is pending before the Regional Trial Court, the Supreme Court, the Court of Appeals or different Divisions thereof, or any other tribunal or agency; and that if he should learn that a similar action or proceeding has been filed or pending before the Supreme Court, the Court of Appeals or different Divisions thereof, or any other tribunals or agency, he shall notify this Honorable Commission within five (5) days from such notice.

IN WITNESS WHEREOF, he has hereunto affixed his signature this ____th day of November 2009 at Parañaque City.

ILAGAN

PETE L.

Affiant

SUBSCRIBED AND SWORN to before me this ____th day of November 2009, by affiant who showed me his Drivers License N10-74-012320 issued by LTO - East Avenue.

Doc. No. _____;
Page No. _____;
Book No. _____;

Series of 2009

