

PENNSYLVANIA UTILITY LAW PROJECT

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January 17, 2012

Via E-Filing

Secretary Rosemary Chiavetta
Pennsylvania Public Utility Commission
P.O. Box 3265
Harrisburg, PA 17105-3265

**Re: Investigation of Pennsylvania's Retail Electric Market: Intermediate
Work Plan Docket No. I-2011-2237952**

Dear Secretary Chiavetta:

Please accept for filing the Joint Comments of AARP, the Pennsylvania Utility Law Project and Community Legal Services, Inc. to the Commission's Tentative Order entered December 16, 2011 in the above referenced matter.

Thank you for your assistance and please feel free to contact me directly should you have any questions.

Respectfully submitted,



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**PENNSYLVANIA
PUBLIC UTILITY COMMISSION**

Investigation of Pennsylvania's
Retail Electricity Market:
Intermediate Work Plan

I-2011-2237952

TENTATIVE ORDER ENTERED DECEMBER 16, 2011

**COMMENTS OF
AARP
The Pennsylvania Utility Law Project
and
Community Legal Services, Inc.**

January 17, 2012

AARP, the Pennsylvania Utility Law Project (“PULP”), and Community Legal Services, Inc. (“CLS”) appreciate the opportunity to provide comments to the Commission on its Tentative Order entered December 16, 2011 that proposes steps that should be undertaken pursuant to an “Intermediate Work Plan” in this proceeding. Specifically, the Tentative Order proposes that the purpose of the plan is to “improve the current retail electricity market.” By “intermediate,” the proposal intends most of the issues, tasks and goals included herein be resolved and implemented prior to the expiration of the electric distribution companies’ (EDCs’) next round of default service plans. Two programs, the Retail Opt-in Auction and Standard Offer Customer Referral Programs, are specifically proposed for inclusion in the EDCs’ upcoming default service plans.

AARP is a nonprofit, nonpartisan organization that helps people 50+ have independence, choice and control in ways that are beneficial and affordable to them and society as a whole. AARP has members residing in each of Pennsylvania’s counties and representing all segments of the socio-economic scale. Moreover, a substantial percentage of AARP’s members live on fixed or limited incomes and depend on reliable electric service for adequate heat, lighting, and powering life-saving medical devices. AARP has previously submitted comments on the various initiatives associated with the Commission’s Retail Markets Investigation, of which this proposal is a part.

PULP is a specialized statewide project of the Pennsylvania Legal Aid Network designated to assist low-income utility and energy residential consumers. For over 30 years PULP has represented the interests of low income Pennsylvanians in energy and utility matters through direct representation, statewide advocacy, and support and assistance to the staff and clients of local legal aid programs, non-profits and community-based agencies. PULP staff has

been actively involved in the technical conferences hosted by OCMO in this Retail Markets Investigation.

CLS is a not for profit law firm that provides free legal service to the low income residents of Philadelphia. Each year, CLS receives hundreds of requests for legal assistance on utility issues. CLS's Energy Unit represents individuals and client groups in utility matters, advocates for affordable utility service on reasonable terms, and conducts community education on utility consumer rights.

Introduction

The proposed intermediate work plan provides recommendations regarding the following topics: (1) the expansion of consumer education; (2) the acceleration of the switching timeframe when a customer shops for an alternative supplier; (3) the initiation of a customer referral program; (4) the initiation of a retail opt-in auction program; (5) the inclusion of the default service PTC on customer bills; and (6) the increase in coordination between EDCs and EGSs.

With respect to the expansion of the consumer education program, AARP, PULP, and CLS have provided input to the development of this program through the Stakeholder meetings and calls. The Commission has already issued a Secretarial Letter that is pending. It does not appear that this Tentative Order seeks further comment from the parties on these matters.

However, AARP, PULP, and CLS continue to raise concerns and object to the Commission's intent to highlight potential savings to customers on their customer education materials since it is our view that (1) not all suppliers will make offers that will result in savings; (2) the inclusion of a hypothetical savings calculation that is based on an annual bill is potentially misleading since suppliers may not offer a product that guarantees savings during a 12- month period when the

EDC's Price to Compare changes quarterly and (3) the emphasis on savings does not educate customers how to shop and compare offers based on price and other terms and conditions.

With regard to the proposal to change the switching timeframes and regulations, AARP, PULP, and CLS have already submitted written comments pursuant to the Tentative Order issued November 14, 2011¹ and incorporate those comments herein as if restated in full.

With regard to the proposal for a more uniform disclosure of the Price to Compare (PTC) on customer bills, AARP, PULP, and CLS support this initiative. It is important that customers see a uniform disclosure of the PTC on every customer bill to enable the customer to shop and compare offers from suppliers.

Finally, AARP, PULP, and CLS support increased coordination among and EDCs and the licensed suppliers to the extent that this coordination and communication can occur without significant costs imposed on EDC ratepayers.

As a result, the comments of AARP, PULP, and CLS focus on the proposed customer referral program and the initiation of a retail opt-in auction program. Before reaching those issues, however, there is an overarching matter that is of grave concern to AARP, PULP, and CLS with respect to this Tentative Order. The Tentative Order does not squarely address how the costs of any of its proposals should be taken into account when evaluating whether to pursue one or more proposals or consider alternatives to those directives proposed in the Tentative Order. Furthermore, the Tentative Order does not seek information from the EDCs or the EGSs concerning the costs that may be incurred to implement the proposed initiatives. Finally, the

¹ See *Interim Guidelines Regarding Standards for Changing a Customer's Electricity Generation Supplier*, order entered November 14, 2011 at Docket No. M-2011-2270442. AARP, PULP, and CLS submitted comments on December 14, 2011.

Tentative Order does not propose any policy about the recovery of the costs that may be incurred by the EDCs or the EGSs to implement these proposals.

The unknowns with respect to the magnitude of costs and manner of cost recovery, is a significant concern to AARP, PULP, and CLS. This is particularly the case because of the potential that the Commission may approve and direct the EDCs to incur unknown costs and seek recovery of those costs from EDC ratepayers, particularly the residential and small commercial customers who are the target of these initiatives. AARP, PULP, and CLS submit that the Commission cannot consider these objectives in a vacuum without obtaining and considering the impact of those costs on ratepayers and without a clear understanding of the Commission's policy with respect to recovery of those costs from ratepayers.

Pennsylvania ratepayers have already incurred millions of dollars in costs to pay for the implementation of retail competition, including costs relating to implementing electronic data exchange systems, changes in bill formats and the adoption of EDC billing for suppliers and paying for the EGS receivables, costs associated with prior and ongoing EDC customer education mailings and communications, costs incurred to modify websites to promote shopping, such as the PAPowerSwitch website promoted by the Commission and those implemented by the individual EDCs, as well as costs associated with implementing the Commission's licensing programs and oversight of the EGS marketing activities and numerous rulemakings and dockets associated with the implementation of the Pennsylvania restructuring statutes, all of which are flowed through to ratepayers. There has never been a compilation of the administrative costs incurred to date by the EDCs and paid for by ratepayers to implement retail restructuring in Pennsylvania. AARP, PULP, and CLS do not dispute that the Pennsylvania General Assembly has directed that retail competition be implemented and that those directives have resulted in

costs incurred by ratepayers to pay for the changes that the EDCs were required to make.

However, the Commission should not embark on a new series of initiatives that are not mandated or specifically reflected in any Pennsylvania statutory directive associated with retail electric and natural gas competition without a thorough consideration of the burden that it may place on ratepayers. Therefore, AARP, PULP, and CLS respectfully urge this Commission to carefully consider the incremental costs that may be incurred by the EDCs and sought to be imposed on residential ratepayers as an integral part of its exploration of additional steps to encourage the development of a retail market for electricity in this proceeding.

Our concerns are particularly important where the retail market for the sale of generation supply service is already robust in Pennsylvania and, in some EDC territories, far exceeds the migration and shopping activity of almost all other states that have adopted retail electric competition. With regard to the EDC areas in which shopping or migration has not yet occurred at a significant level, it would be reasonable to consider additional programs and initiatives to expose residential and small commercial customers to the shopping experience. However, to mandate the implementation of several concurrent and potentially costly programs for every EDC² without regard to the current EGS activities and customer shopping activities and without regard to the potential costs that may be incurred by all ratepayers or non-shopping ratepayers would be unreasonable in our opinion.

Customer Referral Program

AARP, PULP, and CLS do not oppose the implementation of a customer referral program if the need and benefit of such a program are first demonstrated, the costs of

² We recognize that the Tentative Order appears to exclude the three very small EDCs from the opt in auction proposal, but our concerns remain applicable for the remaining EDCs as well.

implementation are reasonable and the design of the program includes important consumer protections. However, prior to requiring the inclusion of customer referral programs into intermediate default service plans and prior to the approval of any specific referral plan which may be proposed, the Commission should articulate the results it intends to achieve through such a program; clearly analyze the actual costs of implementation; evaluate the imposition of those costs in relation to the benefits which are expected to be achieved; and specify the consumer safeguards which must be included.

This sort of analysis is especially needed since Pennsylvania is currently moving toward robust residential competition without such referral programs; the Commission is also recommending the use of a retail opt-in auction to stimulate shopping. Moreover, there is little actual experience with fully developed and implemented customer referral programs outside of New York. Each of the New York utilities implements a version of a customer referral program. While the Commission references the referral program implemented by Orange and Rockland in its Tentative Order, there is no discussion of the other referral models implemented in New York or the results of such programs in the implementation of retail competition. In fact, the New York referral programs, in a variety of forms, have existed for many years. However, they have yet to have any significant impact on customer migration to alternative suppliers. Based on the most recent information published by the New York Public Service Commission, 20.4% of New York's residential customers were served by an alternative supplier as of August 2011. This migration participation rate varies among the electric utilities, but it has not significantly increased in recent years.³ These migration rates are lower than that currently in effect for PPL's

³ The New York Commission's electric migration statistics are available at:
http://www.dps.state.ny.us/Electric-Gas_RA_Arch1111'ves.html

residential electric customers who have selected an EGS without any intervention with a “referral program.”

Thus, in light of the unknown potential of the opt-in auction to, by itself, stimulate customer shopping and the unknown potential of referral programs to provide incremental benefits beyond the auction, particularly when several of the Pennsylvania utilities have demonstrated that successful levels of customer shopping can occur without either an auction or a referral program, AARP, PULP, and CLS urge the Commission to carefully weigh the costs of requiring the imposition of any referral program and to specifically evaluate, within any proposal for such a program, the benefits which result in having such a referral program against the costs that the EDCs would seek to impose on ratepayers.

This very weighing of costs and benefits occurred in the New York referral programs when they were reviewed by the New York State Public Service Commission (“NYPSC”) in 2009. Declaring its efforts to promote retail competition to be a success, the NYPSC stopped much of the ratepayer financing to promote switching to suppliers (called ESCOs in New York), requiring the cost of programs utilizing utility cooperation and expense to be borne by the suppliers and not the EDC ratepayers. A 2009 order describes Con Edison’s referral program, as it had evolved to that point, and discusses the cessation of ratepayer funding for it, and shifts program costs to ESCOs.⁴ AARP, PULP, and CLS request the Commission to clearly state that EDC ratepayers should not subsidize the costs of any approved referral program.

⁴ CASE 07-E-0523 – Proceeding on Motion of the Commission as to the Rates, Charges, Rules and Regulations of Consolidated Edison Company of New York, Inc. for Electric Service, ORDER CONCERNING ESCO REFERRAL PROGRAM, (Issued and Effective June 3, 2009).

Finally, our endorsement of the concept of a customer referral program is also dependent on the implementation of certain consumer protections, the details of which will be discussed, below, in the context of the two referral programs identified in the Tentative Order.

A. New/Moving Customer Referral Program. The Tentative Order recommends that a customer referral program be implemented in 2012 and that all customers who call the EDC for any reason other than an emergency or responding to a termination of service notice be informed of their option to select an EGS. We understand this proposal as implementing a standardized script which would inform customers of their right to shop and select an EGS, coupled with a referral to the PAPowerSwitch website or a “hot transfer” to an EGS. Under this approach, the EDC role would be strictly educational and the actual discussion of any EGS offer would have to be undertaken by the EGS or through the customer’s exploration of offers at the website. The Commission seeks comments on whether an EDC could or should establish a separate call center for this type of information or handle such educational information by the existing EDC call center.

AARP, PULP, and CLS propose that, should the Commission determine that a referral program is warranted and cost effective, that the Commission limit this mandate to offer a referral program only to those calls from customers who are seeking to establish new service or move within the EDC service territory. This approach would significantly reduce the EDC obligation and the potential EDC costs associated with this mandate and allow for an evaluation of the success of this more limited approach and the costs associated with its implementation prior to determining the benefit or needs of an expansion of the program. We do not support any suggestion that would result in a creation of new call center personnel or a mandate to discuss customer shopping opportunities for customers who call to talk about a high bill and the

Company's mandated efficiency and conservation programs, the installation of the smart meter, a call to discuss payment difficulties, negotiate a payment plan, or discuss the customer's enrollment in the EDC's universal service programs. Such calls are typically initiated by the customer to seek a regulated and mandated customer service from the EDC and it would be inappropriate, at least at this phase of the exploration of this program, to incur substantial costs and/ or delay a resolution of the issue which caused the customer's call.

If this referral is associated with the new/moving customer and the customer expresses an interest in speaking with a specific EGS, it would be reasonable to implement a transfer to the specific EGS so that the customer can speak directly with the EGS. However, such an approach should require the EGS who wants to implement this service to pay for it and not the EDC ratepayers. Furthermore, such a transfer must be limited to only the situations in which the customer identifies the EGS that he or she wants to communicate with and should not be used as a means to randomly select an EGS if the customer indicates an interest in learning more about EGS offers in general.

In addition, it is recommended that, as a consumer safeguard, all calls to the referral center be recorded in order to be able to reconcile any issues which may arise such as those concerning inappropriate referrals or slamming.

Finally, AARP, PULP and CLS strongly recommend that CAP customers be excluded from participation in a Customer Referral Program. Since the price to compare will fluctuate quarterly, there is no assurance that the rates which will be provided to the CAP customers by the EGS will be lower than the price to compare. This volatility, potential exposure to higher CAP rates, or, in some service territories, potential exclusion from CAP, are risks which should not be imposed on these economically vulnerable consumers. Clearly, CAP customers should not be

placed in a situation of paying rates above CAP rates and other ratepayers should not be placed in a situation of subsidizing the costs of competitive rates which are greater than the price to compare.

Should the Commission determine not to accept the recommendation of AARP, PULP and CLS to limit this mandate to offer a referral program only to those calls from customers who are seeking to establish new service or move within the EDC service territory, or to exclude CAP Customers from the referral process, then we strongly urge that the company be required to first act to resolve the purpose of the call prior to any referral. For example, if the call is to assert a high bill complaint, the company representative must, prior to the referral, obtain sufficient facts to determine the appropriate action needed to respond to the customer's call. A high bill complaint may be an indication that the caller is a low-income individual who requires immediate referral to and enrollment within a Customer Assistance Program, referral to a Hardship Fund and/or LIHEAP or to conservation services available through LIURP, Act 129 or weatherization. In other situations, the high bill complaint of a renter may have occurred as a result of a foreign load. In that situation, not only would a referral to an EGS be inappropriate to resolve the underlying problem, but would not have determined that the tenant was ineligible to be a ratepayer. Only after the purpose of the call is adequately resolved should a referral to an EGS be made.

B. Standard Offer Customer Referral Program. The Tentative Order proposes a more robust customer referral program that will be included in the EDC's next Default Service filing and implemented in 2013:

The Standard Offer Customer Referral Program should be voluntary for customers (*i.e.*, "opt-in"), as well as participating EGSs. The standard offer should be comprised of a percentage reduction from the effective EDC PTC and should be provided for a minimum of three months. The standard offer and its term should be uniform within an EDC's

service territory. Customers may be assigned to an EGS of their choice or may choose random assignment. The terms and conditions of the standard offer must be presented to customers before they decide to enter the program. The Standard Offer Customer Referral Program should be presented during customer contacts to the EDC call centers, other than calls for emergencies, terminations and the like. The eligible customer base for the Standard Offer Customer Referral Program is recommended to be residential customers on default service at the time of the contact. We anticipate that issues involving CAP customer participation will be addressed in the individual default service plan proceedings.

Once a customer enrolls in the Standard Offer Customer Referral Program, the enrollment will be forwarded to the EGS for EDI processing. At the time of the first contact between the EGS and the customer, the customer will be reminded of the terms and conditions of the standard offer, including the date by which the customer must take action to exercise his or her options at the end of the term. There will be no termination penalty or fee imposed at any time during the effective period of the standard offer. All existing customer notification requirements apply, including notices and the timing of those notices relating to proposed changes in the terms and conditions of the EGS-customer relationship. At the conclusion of the standard offer period, absent affirmative customer action to enter into a new contract with the EGS, the customer's enrollment with a competitive EGS or the customer's return to default service, it is expected that the customer would remain with the EGS on a month-to-month basis without the imposition of early termination fees. We emphasize that all requirements for notices relating to price and term changes would apply. A more complete discussion of the required notices and customer options appears in our discussion of Retail Opt-in Auctions at pages 38-40.

It is expected that detailed implementation/logistical elements will be determined during the default service plan proceeding for each EDC.

AARP, PULP, and CLS oppose the structure of the referral program as outlined above.

First, the use of a three month "teaser" rate is not conducive to educating customers about shopping for an EGS, particularly when this offer is accompanied by the EGS's ability to retain the customer beyond this period without requiring affirmative action by the customer to agree to new terms and conditions of service. Second, the promotion of a referral program on calls initiated by the customer for specific services that are mandated or regulated by the EDC is not appropriate outside of calls made by the customer to initiate new service or move within the EDC service territory. This program should not be implemented for all customer calls. Rather, the program should be targeted to those calls relating to establishing new service or moving

within the EDC service territory. It is only on these calls that the Commission's concern about the "default" nature of default service comes into play.

Third, AARP, PULP, and CLS oppose the notion that customers can be retained by the EGS after the introductory period without affirmative action by the customer to enroll with the EGS's offer. Allowing an EGS to capture customers with a "teaser rate" and then retain such customers who fail to affirmatively select another EGS offer or affirmatively ask to return to default service by putting those customers on a potentially volatile month-to-month rate structure is likely to result in adverse impacts on such customers without full understanding or agreement to accept such a rate offer. The purpose of the referral program should properly expose customers to rate offers that the EGS is committed to implement for any or all EDC customers and not merely provide a "teaser" to get customers to enroll with an EGS and retain such customers at the end of the three or four month teaser rate. This concern is particularly important because the customer who elects to participate in the referral program has called the EDC to seek essential electricity service. The purpose of the call is not to select an EGS per se. The customer may easily agree to an EGS offer on the promise of a lower monthly bill. Any further enrollment by the customer with the EGS should be as a result of the (1) satisfaction of the customer with the three or four month program; and (2) clear acceptance by the customer for further interaction with the EGS based on their experience with the rate and the EGS customer service. Therefore, customers who agree to enroll in the customer referral program should be returned to the EDC if there is no affirmative agreement to accept the EGS offer at the end of the introductory period.

Retail Opt In Auction Program

The Tentative Order recommends that the opt-in auction program be offered to residential customers, that pilot programs not be implemented, that all residential customers, whether already shopping or not, are eligible to participate, that the offer be structured for a minimum of six month and a maximum of 12 months, that the program be initiated in June 2013 preceded by a relatively short one-month enrollment period based on a known price offer, and that a cap of 50% of the EDC default service customer base be established with one EGS limited to 50% of the full enrollment level. With regard to the actual offer, the Tentative Order proposes two options: (1) fixed rate product with pay of a bonus to the customer who enrolls and remains for at least three months; and (2) a percent-off the PTC (and adjusted with changes to the PTR) with no bonus. With regard to what happens to customers at the end of the auction period, the Tentative Order states:

We agree that program participants should be treated no differently than any other shopping customer when the program ends, and that the Commission's renewal notice guidelines should be fully applied. These guidelines state that each customer will get two notices; an initial notice 52-90 days before the end of the program followed by a more detailed "options notice" at least 45 days before the program ends. The options notice, per the guidelines, must provide detailed information as to the new terms and conditions, including the price (which can be variable or fixed), information on their other options (including shopping for a new supplier and a referral to PAPowerSwitch.com and www.oca.state.pa.us) and a date by when the customer must act. Additionally, per the guidelines, if the customer does not affirmatively respond to the notices, the supplier can impose new terms and conditions, as long as the new product is a month-to-month product with no early termination fee. We note that there is no requirement for an EGS to continue service with a customer after the program ends. Such an EGS would still need to provide customers with the standard two notices informing them that they will not be receiving service from that EGS beyond a certain date and providing them with their options ("remaining with the supplier" of course not being an option in this situation).

AARP, PULP, and CLS question whether the Commission should implement both the referral program and this full scale opt in auction at the same time due to the potential costs and

confusion to customer about the two programs, both of which are designed to expose customer to various EGS offers and educate customers about how to shop and the potential benefits for shopping. AARP, PULP, and CLS strongly urge the Commission to delay any implementation of the referral program in order to implement the opt-in auction and avoid the confusion and potential harmful impacts associated with the customer educational messages associated with both programs at the same time. Furthermore, the delay will allow for the success of the opt-in auctions to be evaluated and to determine if there is a need for additional “jump start” programs, such as the referral program and if any potential incremental benefits which may be achieved through a referral program justify the costs of implementation. Our concern is particularly important as well due to the lack of any full scale experience with the kind of referral program proposed by the Tentative Order in other restructuring states.

On a more substantive matter relating to the specific opt in auction policies recommended by the Tentative Order, AARP, PULP, and CLS submit that customers should, absent an affirmative choice to remain with the EGS, be returned to default service at the end of the auction period. Our views are strongly connected to the fact that the opt- in auction will either offer a one-time bonus (similar to the teaser rate promoted with the referral program), or an upfront promise to offer a percentage off the PTC even if the PTC changes during the offer period. Neither of these programs is typical of EGS offers in the competitive market today. As a result, the customer is likely to be enticed to participate in this program on the grounds that they cannot lose and can only experience lower bills than offered through default service. This approach fails to educate customers on how to shop and compare EGS offers under the current default rate structure. Current EGS offers reflect either a variable rate or a fixed rate (which does not change even if the EDC PTC is reduced during the EGS’s fixed rate contract term). AARP,

PULP, and CLS recommend that any opt-in auction require that the customer be returned to default service at the end of the auction period unless the customer affirmatively selects an EGS offer made during the auction period.

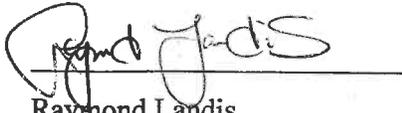
Should the Commission reject AARP, PULP and CLS' proposal that customers be returned to the EDC at the conclusion of the Opt-in Auction period, then we assert that CAP customers be excluded from participation in these auctions for all of the reasons discussed above in connection with the Customer Referral Program. Moreover, even if customers are returned to the EDC at the conclusion of the auction period, as to economically vulnerable low-income customers who are eligible for or who may already be participating in any of the universal services programs offered by the EDC, there must be the ability of these customers to transition from EDC to EGS and back without fee, penalty or loss. Furthermore, the transition process should be structured in a manner which is seamless and continuous without diminution or loss of CAP, LIURP, Hardship Fund or LIHEAP benefits. AARP, PULP and CLS strongly urge that the Commission establish these requirements in advance of approval of either an Opt-in auction or referral program. Finally, AARP, PULP, and CLS oppose the extremely high cap of 50% of all residential customers to be eligible for this program. This cap, coupled with the proposal that one supplier could end up serving 50% of the enrolled customers, is likely to result in only several very large EGSs seeking to participate in such a program, thus eliminating many of the smaller EGSs that are making offers to residential customers in most EDC service territories. Such a scenario would result in market concentration and reduce choice for consumers, the exact opposite of the goals of this proceeding.

Conclusion

AARP, PULP and CLS thank the Commission for this opportunity to Comment on its Tentative Order entered on December 16 2011 and urge the Commission to accept our recommendations for implementing the intermediate work plan in this proceeding.

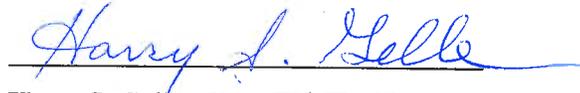
Respectfully submitted,

AARP



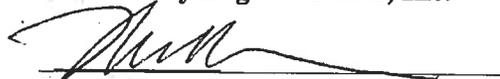
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Dated: January 17, 2012