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December 10, 2012

VIA e-File

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

Re: *Comments of the Pennsylvania Coalition Against Domestic Violence*
Tentative Order: RMI - End State of Default Service
Docket No. I-2011-2237952

Dear Secretary Chiavetta,

Please find the attached comments submitted on behalf of the Pennsylvania Coalition Against Domestic Violence (PCADV).

Respectfully Submitted,

A handwritten signature in black ink, appearing to read 'Elizabeth R. Marx, Esq.', is written over a light blue horizontal line.

Elizabeth R. Marx, Esq.
emarx@pcadv.org

Enclosure

Cc:
Office of Competitive Market Oversight RMI, ra-RMI@pa.gov

3605 Vartan Way, Suite 101 • Harrisburg, PA 17110

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National Resource Center on Domestic Violence: 800-537-2238, ext.5

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

Investigation of Pennsylvania's :
Retail Electricity Market : **Docket No. I-2011-2237952**
End State of Default Service :

**COMMENTS OF THE PENNSYLVANIA COALITION AGAINST DOMESTIC VIOLENCE
IN REGARD TO THE PUBLIC UTILITY COMMISSION'S TENTATIVE ORDER**

I. INTRODUCTION

The Pennsylvania Coalition Against Domestic Violence (PCADV) is a private nonprofit organization that works at the state and national levels to eliminate domestic violence, secure justice for victims, enhance safety for families and communities, and create lasting systems and social change. PCADV coordinates these efforts with its statewide network of domestic violence programs, which provides 24-hour emergency hotlines, shelter, counseling, legal advocacy and representation, healthcare-based advocacy, children's programs, transitional housing and many other free and confidential services. PCADV's network consists of 60 community-based programs.

PCADV has been involved in the Commission's Retail Market Investigation since its inception. We have filed numerous comments on behalf of our member programs and the victims they serve to ensure that victims of domestic violence continue to be able to access safe, affordable utility service. Victims of domestic violence and their children face a dangerous and financially difficult transition period when attempting to leave an abuser. Data reveals that the period of separation and transition is the most lethal time in a victim's

life.¹ Over the years, the General Assembly has enacted various protections to lessen potential hurdles that a victim may encounter when attempting to leave his or her abuser. One such protection is the unencumbered provision of safe, affordable, and reliable utility service.² PCADV provides comments below to alert the Commission to the consequences that the Tentative Order will have on statutory protections for victims of domestic violence. PCADV files these comments on behalf of its 60 member programs and the victims and families these programs serve. Additionally, nine local domestic violence programs, representing ten counties, have individually signed on to these comments to endorse PCADV's position and to express concern for the impact on their programs.³

Additionally, PCADV joins the comments filed by AARP, the Pennsylvania Utility Law Project (PULP), and Community Legal Services (CLS), which more fully explain PCADV's position with respect to the Commission's plans to alter the provision of default service in the Commonwealth. In these separately-filed comments, PCADV stands with AARP, PULP, and CLS in opposition to the Commission's Tentative Order because it embarks the Commission on a legislative foray that is not in accord with principles of administrative law. Every consumer group that has participated in the Retail Market Investigation has expressed opposition to the Commission's plan to alter default service without further empirical data to support such a move;⁴ however, the Commission has ignored this rational

¹ See Dep't of Just., Bureau of Justice Statistics, *Intimate Partner Violence in the U.S.: Victim Characteristics*, available at <http://www.bjs.gov/content/intimate/victims.cfm>; see also Janice Roehel et al., Nat'l Inst. of Just., *Intimate Partner Violence Risk Assessment Validation Study: The RAVE Study Practitioner Summary and Recommendations: Validation of Tools for Assessing Risk from Violence Intimate Partners* (2005), available at <https://www.ncjrs.gov/pdffiles1/nij/grants/209732.pdf>.

² 66 Pa. C.S. § 1417; 52 Pa. Code § 56.251.

³ See Statements of Interest (*attached*) from Schuylkill Women in Crisis, Schuylkill County; The Women's Center, Inc., Columbia and Montour Counties; A Woman's Place, Bucks County; Crisis Center North, Allegheny County; Domestic Violence Services, Lancaster County; Centre County Women's Resource Center, Centre County; Clinton County Women's Center, Inc., Clinton County; Stop Abuse for Everyone (SAFE), Clarion County; Domestic Violence Service Center, Luzerne County.

⁴ See *Comments of the Pennsylvania Coalition Against Domestic Violence regarding the March 21, 2012 En Banc Hearing – End State Default Service Models and Consumer Education*, Docket No. I-2011-2237952 (Apr. 4, 2012) (“We ... believe strongly that the PUC must halt its consideration of the proposed alternative default service models and reassess the value of such a transition because, to date, there has not been any meaningful inquiry into the costs and benefits of a transition in default service provision.”); see also AARP, PULP, CLS, *Comments in*

opposition⁵ and is charging forward in a manner that is in stark contradiction to existing law. As explained more thoroughly below and in our joint comments with AARP, PULP, and CLS, PCADV asserts that such a move may significantly harm the most vulnerable populations in Pennsylvania, including victims of domestic violence.

II. DISCUSSION

The Commission's plan to allow Supplier Consolidated Billing threatens the viability and effectiveness of statutory protections for victims of domestic violence.

The proposed changes to default service present serious concern for the continued application of existing statutory and regulatory protections for electric customers who are victims of domestic violence. Despite PCADV's previous comments,⁶ the Tentative Order fails to adequately address how the Commission plans to ensure that electric generation supply companies (EGSs) will comply with the protections. Such compliance is particularly important in light of the Tentative Order's approval of Supplier Consolidated Billing (SCB).

Response to Staff Discussion Document on End-State Default Service Models, Docket No. I-2011-2237952 (Apr. 4, 2012).

⁵ The Commission recites in the Tentative Order that comments were filed by various consumer groups – including PCADV – at all stages of the Retail Market Investigation (Tentative Order at 2-7); however, it does nothing to address the concerns raised by these consumer groups that a radical shift in default service is unsupported by empirical data. *See supra* note 3. The Tentative Order asserts that “while the stated intention of the Act 129 statutory requirements ... was to ensure adequate and reliable service at the ‘least cost to consumers over time,’ these mandates have had the unintended effect of creating a highly regulated default service product.” (Tentative Order at 11-12). But the position of a multitude of consumer groups throughout the Retail Market Investigation has been that, indeed, the General Assembly meant what they said when they drafted Act 129: That is, the fact that default service is “highly regulated” was not an “unintended consequence” as the Commission asserts, but was rather a purposeful act of the General Assembly to ensure that vulnerable customers are protected from fluctuating market pricing. 66 Pa. C.S. § 2807(e)(3.4).

⁶ *Comments of the Pennsylvania Coalition Against Domestic Violence Regarding the March 21, 2012 En Banc Hearing – End State Default Service Models and Consumer Education*, Docket No. I-2011-2237952, at 2, 4-6 (Apr. 4, 2012) (“PCADV is particularly concerned that, in its exploration of alternative default service models, the PUC has not considered how to ensure strict adherence to specific regulatory and statutory protections for victims of domestic violence.”).

To explain, Title 52, Chapter 56 of the Pennsylvania Code provides very specific protections and exemptions for victims of domestic violence with Protection From Abuse Orders.⁷ These protections stem from the statutory exemption in Title 66, Chapter 14 of the Pennsylvania Consolidated Statutes, which provides that victims of domestic violence with protection orders are not subject to the disconnection, collection, and payment requirements set forth in that chapter.⁸ But the protections for victims of domestic violence, which have been enumerated in the Commission's regulations at 51 Pa. Code § 56.251 *et seq.*, are only binding on regulated electric distribution companies (EDCs).⁹ Thus, if the responsibility for billing, collection and termination were to shift from EDCs to unregulated electric generation supply companies (EGSs), victims of domestic violence would lose the ability to access important protections provided under the law. Such a result is contrary to the intent of the General Assembly and contravenes clear public policy.

PCADV acknowledges that the Commission has, in limited measure, indicated that EGSs will be required to comply with the protections in Chapter 56. (Tentative Order at 20.) However, the Commission has only issued *guidelines* in this respect.¹⁰ Pursuant to the Commission's historical position before the Pennsylvania Commonwealth Court, the Commission's guidelines do not create a binding norm and are not enforceable against the entities to which the guidelines refer.¹¹ The Commission has maintained the position that guidelines only offer a suggested course of action for EGSs to follow and are not subject to judicial review. Thus, if an EGS chooses not to extend the Chapter 56 protections to their customers, the Commission would not be able to enforce such an action against the EGS.

⁷ 52 Pa. Code § 56.251.

⁸ 66 Pa. C.S. § 1417.

⁹ See 52 Pa. Code §§ 56.1 *et seq.* (relating to regulated utilities); see also 52 Pa. Code § 54.43 (relating to EGS duties and responsibilities).

¹⁰ *Guidelines for Maintaining Customer Services at the Same Level of Quality Pursuant to 66 Pa. C.S. § 2807(D), and Assuring Conformance with 52 Pa. Code Chapter 56 Pursuant to 66 Pa. C.S. § 2809(E) and (F)* Final Order, at Docket No. M-00960890F0011 (July 10, 1997); see also Tentative Order at 20 (citing *id.*).

¹¹ See, e.g., *Respondent Pennsylvania Public Utility Commission's Application for Relief in the Form of a Motion to Quash and/or Dismiss Petition for Review* at 7-8, filed in *PCADV v. PUC*, No. 2712 C.D. 2010 (Jan. 19, 2011) (citing *Lopata v. Unemployment Compensation Board of Review*, 493 A.2d 657, 660 (Pa. 1985); *Pa. Human Relations Comm'n v. Norristown Area School District*, 374 A.2d 671, 679 (Pa. 1997); *Metro Trans. v. Pa. Public Utility Comm'n*, 525 A.2d 24 (Pa. Commw. 1987)) (arguing that its guidelines for the dissemination of personal customer information did not create a binding norm subject to judicial oversight).

This would have a devastating impact on victims of domestic violence and their families, as it would abolish necessary and important statutory legal protections that assist victims without employing the proper legislative channels.

Also troubling to PCADV, and its member programs, is the fact that the Commission explicitly reserved its right to revise any or all consumer protections. (Tentative Order at 20-21.) This reservation of power – coupled with the Commission’s failure to specify the specific legislative changes it intends to seek – raises significant question as to the Commission’s future intentions with respect to the consumer protections in Chapter 56. (Tentative Order at 18.)

Even if the Commission’s guidelines were sufficient to require EGSs to comply with the statutory and regulatory protections for victims of domestic violence, PCADV asserts that SCB would be extremely difficult to implement or enforce, and would burden our already over-extended member programs. In the attached statements of interest, our member programs explain that it has taken many years to educate EDC staff to ensure that victims are able to access the relief to which they are entitled – this is for just seven large EDCs. If the Commission were to implement its plan to allow SCB, PCADV and its member programs would be forced to spend significant resources and time to develop similar working relationships with 150+ EGSs. And, in the event that an EGS fails to adhere to these requirements, our programs will need to absorb the cost of providing additional advocacy services to victims who are denied protection.

In the attached statements of interest, several of PCADV’s member programs express their concern for the Commission’s plans outlined in the Tentative Order. Many explain that, currently, the seven regulated EDCs are not properly implementing the domestic violence protections in Chapter 56 of the Pa. Code, and voice concern that the proposed changes will only further exacerbate this systemic problem. Below are a few excerpts from the attached statements that illustrate the problems programs experience at the county level.

- **Schuylkill Women in Crisis, Schuylkill County:**

“The inability to provide adequate shelter, which includes utilities, too often remains a major obstacle in battered women’s efforts to leave the abusive relationship. The proposed changes appear to ... create more obstacles and fails to address how the current protections for domestic violence victims will be incorporated by new carriers.”

- **The Women’s Center, Inc., Columbia / Montour Counties:**

*“Utility companies; both default providers and competitive suppliers have **breached victim confidentiality and disregarded special reliefs** for service disconnections for victims with Protection From Abuse Orders (PFA). **In one instance, a victim who qualified for relief from disconnection was nonetheless disconnected from service and was without electricity for over 7 days until the issue could be resolved.** We greatly fear that the proposed changes would serve only to exacerbate the already challenging task of not only ensuring that utility providers and their employees are thoroughly educated about special protections for victims but also in the continued implementation of those protections.”*

- **Crisis Center North, Allegheny County:**

“Many of the women who seek Crisis Center North’s services are faced with utility shut offs or bills exceeding amounts they are able to pay due to acts of domestic violence. While there can be stumbling blocks, in our experience, survivors with protection orders are able to keep accounts open or receive utility assistance, which is something we would like to see continue. Providing consistency, understanding and choice for survivors are what we seek to see from the PUC and utility companies.”

- **Domestic Violence Services, Lancaster County:**

*“In our attempts to work with clients in our local program on this issue it has been **extremely difficult to coordinate with the current providers** based on their limited knowledge of the protections available to victims and those experiences involved an*

*advocate or even an attorney representing a client. **While we have been successful in having positive outcomes for victims when we are involved to navigate the already burdensome system, victims attempting to do this on their own, which may often be the case, would be further disadvantaged by the proposed changes.***

- **Centre County Women’s Resource Center, Centre County:**

*“In our experience, victims of domestic violence face numerous barriers to establishing financial independence after leaving their abusers. Their ability to maintain stable and affordable housing is an important piece in their on-going safety planning. **Fluctuations in utility costs may impede a survivor’s ability to budget monthly on a limited income. It is common for survivors to return to an abusive situation because they cannot afford to live independently.** For this reason, it is essential that these protections exist.”*

- **Clinton County Women’s Center, Inc., Clinton County:**

“Recently a client’s electrical service was terminated due to the fact that the abuser was removed from the home along with his income and the client was no longer able to pay her bill. She received no help from the electric company.”

In light of the above concerns, we request that the Commission halt its plan to approve SCB until it undertakes a more official regulatory proceeding that will properly bind EGSs to adhere to Chapter 56 protections. In addition, PCADV urges this Commission to require that all EGS staff, as well as any contractor who conducts account activities on behalf of the EGS, receive mandatory training about relief that is available to victims of domestic violence. This will alleviate the added burden to our member programs and will ensure that victims who are not connected with our services will receive the protections without complication.

III. CONCLUSION

PCADV urges the Commission to carefully consider the concerns and suggestions raised in its joint comments with AARP, PULP, and CLS, as well as the potential impact that the Tentative Order will have on the statutory and regulatory protections for victims of domestic violence.

Respectfully Submitted,



Elizabeth R. Marx
Staff Attorney
Pa. ID # 309014
emarx@pcadv.org

Laurie L. Baughman
Senior Attorney
Pa. ID # 86564
lbaughman@pcadv.org

Dated December 10, 2012

On behalf of:

The Pennsylvania Coalition Against
Domestic Violence
3605 Vartan Way
Suite 101
Harrisburg, PA 17110



December 10, 2012

Re: Statement of Interest of Schuykill Women in Crisis
PUC Docket No. I-2011-2237952

Dear Commissioners:

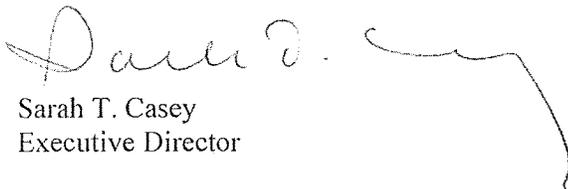
We are writing in support of the comments issued by the Pennsylvania Coalition Against Domestic Violence in the above captioned action. The Commission's proposed changes to default service could have far-reaching implications for victims of domestic violence, many of whom struggle to obtain safety and autonomy from their abusive partners.

Of particular concern is the Commission's failure to address the protections for victims of domestic violence outlined in 66 Pa. C.S. § 1417 and 52 Pa. Code § 56.251. We are concerned that the proposed shift in billing responsibilities, coupled with the lack of guidance for supply companies regarding the protections' continued viability and applicability, may result in many supply companies failing to properly adhere to the protections. It has taken many years for our program to establish a working relationship with the large distribution companies to ensure that the protections are available to all victims, and a sudden shift to that relationship would come at a great cost to our program and to the victims we serve.

We have been providing services to victims of domestic violence for nearly 30 years and during that time have encountered victims who had difficulty getting utilities in their name even under the current regulations. The inability to provide adequate shelter, which includes utilities, too often remains a major obstacle in battered women's efforts to leave the abusive relationship. The proposed changes appear to either create more obstacles and fails to address how the current protections for domestic violence victims will be incorporated by new carriers.

For these reasons, and the reasons outlined more fully in the comments issued by the Pennsylvania Coalition Against Domestic Violence, we urge the Commission to continue its adherence to the existing default service law.

Sincerely,



Sarah T. Casey
Executive Director

of
Columbia/Montour
111 North Market Street
Bloomsburg, Pennsylvania 17815
www.thewomenscenterinc.org



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Shelter: (570) 784-6631

Fax: (570) 784-6680
E-mail: womenctr1@verizon.net

December 10, 2012

Re: Statement of Interest of The Women's Center, Inc. of Columbia/Montour
PUC Docket No. I-2011-2237952

Dear Commissioners:

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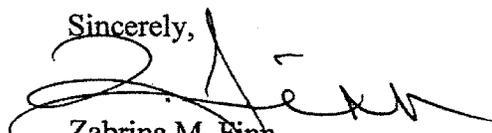
We are writing in support of the comments issued by the Pennsylvania Coalition Against Domestic Violence in the above captioned action. The Commission's proposed changes to default service could have far-reaching implications for victims of domestic violence, many of whom struggle to obtain safety and autonomy from their abusive partners.

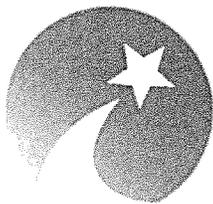
Of particular concern is the Commission's failure to address the protections for victims of domestic violence outlined in 66 Pa. C.S. § 1417 and 52 Pa. Code § 56.251. We are concerned that the proposed shift in billing responsibilities, coupled with the lack of guidance for supply companies regarding the protections' continued viability and applicability, may result in many supply companies failing to properly adhere to the protections. It has taken many years for our program to establish a working relationship with the large distribution companies to ensure that the protections are available to all victims, and a sudden shift to that relationship would come at a great cost to our program and to the victims we serve.

In the last few years, our agency has provided advocacy services with utility providers on behalf several victims. Utility companies; both default providers and competitive suppliers, have breached victim confidentiality and disregarded special reliefs for service disconnections for victims with Protection From Abuse Orders (PFA). In one instance, a victim who qualified for relief from disconnection was nonetheless disconnected from service and was without electricity for over 7 days until the issue could be resolved. We greatly fear that the proposed changes would serve only to exacerbate the already challenging task of not only ensuring that utility providers and their employees are thoroughly educated about special protections for victims but also in the continued implementation of those protections.

For these reasons, and the reasons outlined more fully in the comments issued by the Pennsylvania Coalition Against Domestic Violence, we urge the Commission to continue its adherence to the existing default service law.

Sincerely,


Zabrina M. Finn
Executive Director



Crisis Center North

Providing direction to victims of domestic violence

December 10, 2012

Re: Statement of Interest of Crisis Center North
PUC Docket No. I-2011-2237952

Dear Commissioners:

We are writing in support of the comments issued by the Pennsylvania Coalition Against Domestic Violence in the above captioned action. The Commission's proposed changes to default service could have far-reaching implications for victims of domestic violence, many of whom struggle to obtain safety and autonomy from their abusive partners.

Of particular concern is the Commission's failure to address the protections for victims of domestic violence outlined in 66 Pa. C.S. § 1417 and 52 Pa. Code § 56.251. We are concerned that the proposed shift in billing responsibilities, coupled with the lack of guidance for supply companies regarding the protections' continued viability and applicability, may result in many supply companies failing to properly adhere to the protections. It has taken many years for our program to establish a working relationship with the large distribution companies to ensure that the protections are available to all victims, and a sudden shift to that relationship would come at a great cost to our program and to the victims we serve.

Many of the women who seek Crisis Center North's services are faced with utility shut offs or bills exceeding amounts that they are able to pay due to acts of domestic violence. While there can be stumbling blocks, in our experience, survivors with protection orders are able to keep accounts open or receive utility assistance, which is something we would like to see continue. Providing consistency, understanding and choice for survivors are what we seek to see from the PUC and utility companies.

For these reasons, and the reasons outlined more fully in the comments issued by the Pennsylvania Coalition Against Domestic Violence, we urge the Commission to continue its adherence to the existing default service law.

Sincerely,

Grace A. Coleman
Executive Director

P.O. Box 101093 • Pittsburgh, PA 15237
Administration: 412-364-6728 • Fax: 412-364-5787
Toll Free: 1-866-782-0911



Domestic Violence Services
of Lancaster County
Catalyst for Change

*A Community Action
Program of
Lancaster County*

P.O. Box 359
Lancaster, PA 17608
Hotline: (717) 299-1249
Business: (717) 299-9677
Fax: (717) 290-6855
Web: www.dvslanc.org

December 10, 2012

Re: Statement of Interest of Domestic Violence Services of Lancaster County
PUC Docket No. I-2011-2237952

Dear Commissioners:

We are writing in support of the comments issued by the Pennsylvania Coalition Against Domestic Violence in the above captioned action. The Commission's proposed changes to default service could have far-reaching implications for victims of domestic violence, many of whom struggle to obtain safety and autonomy from their abusive partners.

Of particular concern is the Commission's failure to address the protections for victims of domestic violence outlined in 66 Pa. C.S. § 1417 and 52 Pa. Code § 56.251. We are concerned that the proposed shift in billing responsibilities, coupled with the lack of guidance for supply companies regarding the protections' continued viability and applicability, may result in many supply companies failing to properly adhere to the protections. It has taken many years for our program to establish a working relationship with the large distribution companies to ensure that the protections are available to all victims, and a sudden shift to that relationship would come at a great cost to our program and to the victims we serve.

In our attempts to work with clients in our local program on this issue it has been extremely difficult to coordinate with the current providers based on their limited knowledge of the protections available to victims and those experiences involved an advocate or even an attorney representing a client. While we have been successful in having positive outcomes for victims when we are involved to navigate the already burdensome system, victims attempting to do this on their own, which may often be the case, would be further disadvantaged by the proposed changes.

For these reasons, and the reasons outlined more fully in the comments issued by the Pennsylvania Coalition Against Domestic Violence, we urge the Commission to continue its adherence to the existing default service law.

Sincerely,

Donna "Bonnie" Glover
Director



CCWRC
CENTRE COUNTY
Women's Resource Center

140 W. Nittany Avenue • State College, PA 16801-4811 • 814-238-7066 • Fax 814-238-4449
Email: ccwrc@ccwrc.org • Toll Free Hotline 1-877-234-5050 • Bellefonte Office 814-355-6477

December 5, 2012

Re: Statement of Interest of Centre County Women's Resource Center
PUC Docket No. I-2011-2237952

Dear Commissioners:

We are writing in support of the comments issued by the Pennsylvania Coalition Against Domestic Violence in the above captioned action. The Commission's proposed changes to default service could have far-reaching implications for victims of domestic violence, many of whom struggle to obtain safety and autonomy from their abusive partners.

Of particular concern is the Commission's failure to address the protections for victims of domestic violence outlined in 66 Pa. C.S. § 1417 and 52 Pa. Code § 56.251. We are concerned that the proposed shift in billing responsibilities, coupled with the lack of guidance for supply companies regarding the protections' continued viability and applicability, may result in many supply companies failing to properly adhere to the protections. It has taken many years for our program to establish a working relationship with the large distribution companies to ensure that the protections are available to all victims, and a sudden shift to that relationship would come at a great cost to our program and to the victims we serve.

In our experience, victims of domestic violence face numerous barriers to establishing financial independence after leaving their abusers. Their ability to maintain stable and affordable housing is an important piece in their on-going safety planning. Fluctuations in utility costs may impede a survivor's ability to budget monthly on a limited income. It is common for survivors to return to an abusive situation because they cannot afford to live independently. For this reason, it is essential that these protections exist.

For these reasons, and the reasons outlined more fully in the comments issued by the Pennsylvania Coalition Against Domestic Violence, we urge the Commission to continue its adherence to the existing default service law.

Sincerely,



Mary Faulkner
Director of Counseling and Advocacy Services



Clinton County Women's Center, Inc.
Hilton SAFE House
34 West Main Street
Lock Haven, PA 17745
Business: (570) 748-9539
Fax: (570) 748-9549

December 10, 2012

Re: Statement of Interest of Clinton County Women's Center, Inc.
PUC Docket No. I-2011-2237952

Dear Commissioners:

We are writing in support of the comments issued by the Pennsylvania Coalition Against Domestic Violence in the above captioned action. The Commission's proposed changes to default service could have far-reaching implications for victims of domestic violence, many of whom struggle to obtain safety and autonomy from their abusive partners.

Of particular concern is the Commission's failure to address the protections for victims of domestic violence outlined in 66 Pa. C.S. § 1417 and 52 Pa. Code § 56.251. We are concerned that the proposed shift in billing responsibilities, coupled with the lack of guidance for supply companies regarding the protections' continued viability and applicability, may result in many supply companies failing to properly adhere to the protections. It has taken many years for our program to establish a working relationship with the large distribution companies to ensure that the protections are available to all victims, and a sudden shift to that relationship would come at a great cost to our program and to the victims we serve.

Recently a client's electrical service was terminated due to the fact that the abuser was removed from the home along with his income and the client was no longer able to pay her bill. She received no help from the electric company.

For these reasons, and the reasons outlined more fully in the comments issued by the Pennsylvania Coalition Against Domestic Violence, we urge the Commission to continue its adherence to the existing default service law.

Sincerely,

Mary Jane Isenberg
Executive Director

*Serving victims of domestic and sexual violence in Clinton County since 1979.
The Clinton County Women's Center is an Equal Opportunity Program.
Discrimination is prohibited by Federal Law.
Complaints of discrimination may be filed with the Secretary of Agriculture, Washington, D.C. 20250
Or by calling (202)720-5964 (Voice & TDD)*





P.O. Box 108
Clarion, PA 16214
(814) 226-8481

December 10, 2012

Re: Statement of Interest of SAFE
PUC Docket No. I-2011-2237952

Dear Commissioners:

We are writing in support of the comments issued by the Pennsylvania Coalition Against Domestic Violence in the above captioned action. The Commission's proposed changes to default service could have far-reaching implications for victims of domestic violence, many of whom struggle to obtain safety and autonomy from their abusive partners.

Of particular concern is the Commission's failure to address the protections for victims of domestic violence outlined in 66 Pa. C.S. § 1417 and 52 Pa. Code § 56.251. We are concerned that the proposed shift in billing responsibilities, coupled with the lack of guidance for supply companies regarding the protections' continued viability and applicability, may result in many supply companies failing to properly adhere to the protections. It has taken many years for our program to establish a working relationship with the large distribution companies to ensure that the protections are available to all victims, and a sudden shift to that relationship would come at a great cost to our program and to the victims we serve.

For these reasons, and the reasons outlined more fully in the comments issued by the Pennsylvania Coalition Against Domestic Violence, we urge the Commission to continue its adherence to the existing default service law.

Sincerely,

Donna Keller
Executive Director

December 10, 2012

Re: Statement of Interest of Domestic Violence Service Center, Inc.
PUC Docket No. I-2011-2237952

Dear Commissioners:

We are writing in support of the comments issued by the Pennsylvania Coalition Against Domestic Violence in the above captioned action. The Commission's proposed changes to default service could have far-reaching implications for victims of domestic violence, many of whom struggle to obtain safety and autonomy from their abusive partners.

Of particular concern is the Commission's failure to address the protections for victims of domestic violence outlined in 66 Pa. C.S. § 1417 and 52 Pa. Code § 56.251. We are concerned that the proposed shift in billing responsibilities, coupled with the lack of guidance for supply companies regarding the protections' continued viability and applicability, may result in many supply companies failing to properly adhere to the protections. It has taken many years for our program to establish a working relationship with the large distribution companies to ensure that the protections are available to all victims, and a sudden shift to that relationship would come at a great cost to our program and to the victims we serve.

Because of past advocacy by the Pennsylvania Coalition Against Domestic Violence with the Commission regarding protections for victims of domestic violence, Domestic Violence Service Center and the victims it serves has had positive experiences with distribution companies. For these reasons, and the reasons outlined more fully in the comments issued by the Pennsylvania Coalition Against Domestic Violence, we urge the Commission to continue its adherence to the existing default service law.

Sincerely,



Paula M. Triano
Executive Director

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Patricia Wright

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Life Members: Sandy Rifkin, Shirley Fort
Executive Director: Paula M. Triano



Member Agency



A Woman's Place

*A community issue. A community organization.
Community Change*

December 10, 2012

Re: Statement of Interest of A Woman's Place
PUC Docket No. I-2011-2237952

Dear Commissioners:

On behalf of A Woman's Place, I am writing in support of the comments issued by the Pennsylvania Coalition Against Domestic Violence in the above captioned action. The Commission's proposed changes to default service could have far-reaching implications for victims of domestic violence, many of whom struggle to obtain safety and autonomy from their abusive partners.

Of particular concern is the Commission's failure to address the protections for victims of domestic violence outlined in 66 Pa. C.S. § 1417 and 52 Pa. Code § 56.251. We are concerned that the proposed shift in billing responsibilities, coupled with the lack of guidance for supply companies regarding the protections' continued viability and applicability, may result in many supply companies failing to properly adhere to the protections. It has taken many years for our program to establish a working relationship with the large distribution companies to ensure that the protections are available to all victims, and a sudden shift to that relationship would come at a great cost to our program and to the victims we serve.

For the reasons outlined more fully in the comments issued by the Pennsylvania Coalition Against Domestic Violence, we urge the Commission to continue its adherence to the existing default service law.

Sincerely,

Ifeoma Aduba
Executive Director

Free, Private, Confidential

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A MEMBER AGENCY UNITED WAY OF BUCKS COUNTY

A copy of the official registration and financial information may be obtained from the PA Department of State by calling toll free, within PA. 1 800 732 0999.
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