

COMMONWEALTH OF PENNSYLVANIA



OFFICE OF CONSUMER ADVOCATE

555 Walnut Street, 5th Floor, Forum Place
Harrisburg, Pennsylvania 17101-1923
(717) 783-5048
800-684-6560

FAX (717) 783-7152
consumer@paoca.org

January 4, 2016

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17120

RE: Petition of PPL Electric Utilities
Corporation for Approval of its Act 129
Phase III Energy Efficiency and
Conservation Plan
Docket No. M-2015-2515642

Dear Secretary Chiavetta:

Enclosed please find the Office of Consumer Advocate's Comments, in the above-referenced proceeding.

Copies have been served upon all parties of record as shown on the attached Certificate of Service.

Respectfully Submitted,

A handwritten signature in cursive script that reads "Amy E. Hidakis".

Amy E. Hidakis
Assistant Consumer Advocate
PA Attorney I.D. # 310094

Enclosures

cc: Honorable Susan D. Colwell, ALJ
Certificate of Service

214863

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Petition of PPL Electric Utilities Corporation :
For Approval of its Act 129 Phase III : Docket No. M-2015-2515642
Energy Efficiency and Conservation Plan :

COMMENTS OF THE
OFFICE OF CONSUMER ADVOCATE

Amy E. Hirakis
Assistant Consumer Advocate
PA Attorney I.D. # 310094
E-Mail: AHirakis@paoca.org

Darryl Lawrence
Senior Assistant Consumer Advocate
PA Attorney I.D. # 93682
E-Mail: DLawrence@paoca.org

Counsel for:
Tanya J. McCloskey
Acting Consumer Advocate

Office of Consumer Advocate
555 Walnut Street 5th Floor, Forum Place
Harrisburg, PA 17101-1923
Phone: (717) 783-5048
Fax: (717) 783-7152

January 4, 2016

TABLE OF CONTENTS

I. INTRODUCTION	1
A. Background	1
B. The Stakeholder Process	3
C. Legal Standards	3
D. Summary of PPL's Phase III Plan	5
II. PRELIMINARY COMMENTS ON THE PLAN AND PROGRAMS	6
A. Introduction.....	6
B. Phase III Residential Programs	6
C. Special Plan Requirements	7
1. Low-Income Program Requirements	7
2. Government/Non-Profit/Educational (GNE)	8
3. Inclusion of Comprehensive Programs	8
4. Peak Demand Program.....	9
D. Multifamily Housing.....	10
E. Cost Recovery	10
III. CONCLUSION	13

I. INTRODUCTION

The Office of Consumer Advocate (OCA) is filing these Comments in accordance with the Notice in the *Pennsylvania Bulletin* published December 12, 2015. 45 Pa.B. 7078. These Comments are in response to the Petition of PPL Electric Utilities Corporation for Approval of its Act 129 Phase III Energy Efficiency and Conservation Plan (Phase III Plan or Plan), filed with the commission on November 30, 2015. A prehearing Conference is scheduled for January 5, 2016, before Administrative Law Judge Susan D. Colwell. At this time, the OCA anticipates that it will serve the written expert testimony of Stacy Sherwood¹ and Roger Colton² in this proceeding. The OCA requests that these Comments be read and considered in conjunction with the OCA's testimony.

A. Background

On November 14, 2008, Act 129 of 2008 (Act 129) became effective. Act 129 contained a requirement for the Pennsylvania Public Utility Commission (Commission) to implement an Energy Efficiency and Conservation Program for Electric Distribution Companies (EDCs) with more than 100,000 customers. See 66 Pa.C.S. § 2806.1, *et seq.* On January 15, 2009, the Commission adopted an Implementation Order establishing the specific standards that the EDCs' Energy Efficiency and Conservation (EE&C) plans for the period June 1, 2009 through May 31, 2013 (Phase I) were required to meet. See [Energy Efficiency and Conservation](#)

¹ Ms. Sherwood is an Economist at Exeter Associates, Inc. Ms. Sherwood previously served as a Staff member of the Maryland Public Service Commission, where she reviewed filings regarding the 2012 – 2014 and 2015 – 2017 energy efficiency and demand response (EE & DR) plans for Baltimore Gas and Electric, Delmarva Power and Light Company, Potomac Edison, Potomac Electric Power Company, the Southern Maryland Electric Cooperative, and the Maryland Department of Housing and Community Development (DHCD). Ms. Sherwood filed comments and presented before the MD PSC regarding the 2012 – 2014 EE & DR plans for Potomac Electric Power Company and 2015 – 2017 EE & DR plans for the five utilities and DHCD. Additionally, Ms. Sherwood reviewed plan progress and made programmatic recommendations on a semi-annual basis.

² Roger D. Colton is a principal in the firm of Fisher, Sheehan & Colton, Public Finance and General Economics. Mr. Colton provides technical assistance to a variety of public utilities, state agencies and consumer organizations on rate and customer service issues for telephone, water/sewer, natural gas and electric utilities. Mr. Colton's work focuses on low-income energy issues, and he has testified and published extensively in this area.

Program, Docket No. M-2008-2069887 (Order Entered Jan. 16, 2009). On August 2, 2012, the Commission adopted a second Implementation Order establishing the next phase of the EE&C program for the period June 1, 2013 through May 31, 2016 (Phase II). See Energy Efficiency and Conservation Program, Docket No. M-2012-2289411 (Order Entered Aug. 2, 2014). The seven largest EDCs—PECO Energy Company (PECO), PPL Electric Utilities, Inc. (PPL), the FirstEnergy Companies (Metropolitan Edison Company, Pennsylvania Electric Company, Pennsylvania Power Company, West Penn Power Company), and Duquesne Light Company – developed and implemented plans in Phases I and II of the EE&C programs.

On June 19, 2015, the Commission entered its Phase III Implementation Order, adopting EDC-specific targets for reducing energy consumption for the Phase III EE&C Program term (June 1, 2016 - May 31, 2021). Energy Efficiency and Conservation Program, Docket No. M-2014-2424864 (Order Entered June 19, 2015) (Phase III Implementation Order). PPL's Phase III consumption reduction target was set at 3.8% of its expected sales for the June 1, 2009 through May 31, 2010 period.³ Phase III Implementation Order at 57. The Commission also directed that PPL's Phase III Plan: (1) achieve 3.5% of its overall consumption reductions from the Government/ Non-Profit/ Educational (GNE) sector; (2) achieve a minimum of 5.5% of its consumption reductions from programs exclusively directed at low-income customers; (3) offer at least one comprehensive measure for residential customers and at least one comprehensive measure for nonresidential customers; and (4) achieve a total overall gross verified demand reduction of at least 92 MW. Id. at 35, 61, 68-70, 74-76. As in Phase I and II, the Total Resource Cost (TRC) test will continue to be used to evaluate each EDC's Plan. Id. at 97-98.

³ The Phase III Implementation Order requires that the Phase III Plans are designed to achieve at least 15% of the consumption reduction target each year of Phase III. Phase III Implementation Order at 59. For PPL, this equates to 216,455 MWh/year. PPL's Plan was designed to achieve this yearly consumption reduction target. See Plan at 18.

The Phase III Implementation Order also detailed the Phase III Plan approval process. According to the Order, the EDCs were to file their proposed Plans and the Commission was to publish those Plans in the *Pennsylvania Bulletin*. Phase III Implementation Order at 89-91. In compliance with the Implementation Order, PPL filed its Phase III Plan with the Commission on November 30, 2015. PPL's Plan was published in the *Pennsylvania Bulletin* on December 12, 2015. 45 Pa.B. 7078. The notice required that interested parties file comments to the Phase III Plan within 20 days of publication. The Commission is to approve or reject all or part of the Plan at a Public Meeting within 120 days of the filing. Phase III Implementation Order at 89-91.

The OCA provides the following Comments on PPL's Plan in accordance with the Commission's Phase III Implementation Order.

B. The Stakeholder Process

PPL held several meetings with stakeholders regarding the winding down of Phase II and its proposals for Phase III. The OCA participated in each of these meetings and found the PPL stakeholder process to be well attended and collaborative in nature. In the OCA's view, the stakeholder process encouraged a two-way dialogue and allowed for a better informed process for both the participants and the Company. The OCA notes that the Phase III Implementation Order requires the EDCs to continue the stakeholder process throughout the Phase III period. Phase III Implementation Order at 15.

C. Legal Standards

A number of standards are considered by the Commission in determining whether an EDC's EE&C Plan should be approved. 66 Pa.C.S. § 2806.1(a). For example, Act 129 states that each Plan must include a variety of energy efficiency and conservation measures and that such measures must be provided equitably to all classes of customers. 66 Pa.C.S. § 2806.1(a)(5).

Further, cost recovery must be structured in such a manner to ensure that approved measures are paid for by the same customer class that will receive the direct benefits of those measures. Id. at § 2806.1(a)(11).

Act 129 also specifically requires each EDC to demonstrate, *inter alia*, that its Plan is both cost effective using the TRC test and provides a diverse cross section of alternatives for customers of all rate classes. See 66 Pa.C.S. § 2806.1(b)(1)(i)(I). In the Act, a TRC test is defined as:

[A] standard test that is met if, over the effective life of each plan not to exceed 15 years, the net present value of the avoided monetary cost of supplying electricity is greater than the net present value of the monetary cost of energy efficiency conservation measures.

66 Pa.C.S. § 2806.1(m). The TRC will continue to be used to evaluate each EDC's Phase III Plan. Phase III Implementation Order at 97-98. The revised TRC test for the Phase III Plans was adopted by the Commission at its June 11, 2015 Public Meeting. 2016 Total Resource Cost (TRC) Test, Docket No. M-2015-2468992 (Order Entered June 22, 2015)(TRC Test Order).

Finally, as was discussed above, in its Phase III Implementation Order, the Commission directed that each Company's Plan be developed to include a series of specific carve-outs. The carve-outs are as follows: (1) achieve 3.5% of its overall consumption reductions from the Government/ Non-Profit/ Educational (GNE) sector; (2) achieve a minimum of 5.5% of its consumption reductions from programs exclusively directed at low-income customers; (3) offer at least one comprehensive measure for residential customers and at least one comprehensive measure for nonresidential customers; and (4) achieve a total overall gross verified demand reduction of at least 92 MW. Id. at 35, 61, 68-70, 74-76. Additionally, the plan must be designed to achieve at least 15% of the EDC's consumption reduction target each year of Phase III. Phase III Implementation Order at 59. The OCA submits that, in addition to reviewing the

Company's proposed Phase III Plan for its potential to achieve the 3.8% consumption reduction target, PPL's Phase III Plan must also be reviewed to ensure that it is designed to meet all of aforementioned goals and targets in a cost-effective manner.

D. Summary of PPL's Phase III Plan

On November 30, 2015, in compliance with the requirements of Act 129 and the Commission's Phase III Implementation Order, PPL filed its Petition and Phase III Plan with the Commission. PPL's Phase III Plan is designed to reduce total energy consumption by 1,582,985 MWh/yr. over the five years of the program and achieve a 115 MW peak demand reduction in the final four years of the program. Plan at 2, Table 2. To achieve these consumption reduction targets, PPL proposed nine energy-efficiency programs and one demand response program. Plan at 1, Table 1. Of the nine energy-efficiency programs, seven of the programs are targeted towards the residential class. All nine programs are a continuation from Phase II, though several programs have been modified. Petition at 11. PPL's proposed demand response program is designed for the nonresidential classes. Petition at 11.

PPL anticipates that it will use its entire budget of \$312.5 million for the Phase III Plan, which includes \$5 million for Statewide Evaluator costs not subject to the cost cap. Plan at 163-166. These costs are broken down by class as follows: Residential (including low-income) - \$166.5 million; Small Commercial and Industrial (SC&I) - \$71.9 million; Large Commercial and Industrial (LC&I) - \$50.5 million; and GNE - \$23.6 million. Plan at 166, Table 93.

PPL intends to recover its costs through an Act 129 Rider that will be imposed under Section 1307 and will be both reconcilable and non-bypassable. Plan at 167. A separate recovery charge will be established for the three major customer classes – Residential, Small C&I, and Large C&I. Plan at 167. For residential customers, the recovery charge will be a cents per kWh component of the distribution charge. Plan at 167. For small commercial and industrial

customers, the recovery charge will be a cents per kWh charge that will be a separate line item on the customer's bill. Id. For large commercial and industrial customers, the recovery charge will be a dollar per kW charge that will be a separate line item on the customer's bill, where the demand kW is the customer's PJM Interconnection, LLC Peak Load Contribution. Id.

II. PRELIMINARY COMMENTS ON THE PLAN AND PROGRAMS

A. Introduction

PPL's proposed Phase III EE&C Plan contains nine energy efficiency programs and a demand response program. Plan at 1. All of PPL's proposed energy efficiency programs are a continuation, in some form, of its Phase II programs. Id. PPL's proposed Plan offers each customer class a mix of programs in which the customers can participate. Id. PPL's proposed demand response program is only available for the small and large C&I classes. See Plan at 1, 91-97, 114-120. The OCA will examine whether PPL's proposed Plan and programs are reasonable, well-balanced, and comply with the requirements of Act 129 and the Phase III Implementation Order. These Comments highlight some of the key issues that the OCA intends to examine in this proceeding.

B. Phase III Residential Programs

Of the nine programs included in PPL's Phase III Plan, the following five programs are offered to all residential customers: (1) Appliance Recycling; (2) Efficient Lighting; (3) Energy Efficient Home; (4) Student Energy Efficient Education; and (5) Home Energy Education. Plan at 1, Table 1. The Plan also includes two residential low income programs: (1) Low-Income WRAP, and (2) Energy Efficiency Kits and Education. Id. Low-income customers may participate in both the residential programs and the low-income programs. Plan at 33.

The OCA will review these programs for potential issues including, but not limited to: (1) whether the appropriate appliances and technologies have been included in the programs; (2) whether the proposed incentive rebate levels are reasonable and appropriate; (3) whether the proposed measures are reasonably calculated to achieve the proposed savings levels; (4) whether the proposed measures are cost-effective, and (5) whether the proposed savings can be maintained over a period of time.

C. Special Plan Requirements

1. Low-Income Program Requirements

The Phase III Implementation Order requires that the EDC's achieve at least 5.5% of their total energy reductions from the low-income customer sector, and that these savings must come entirely from participation in low-income programs⁴ (i.e., savings achieved from low-income customers participating in general residential programs cannot be counted towards the 5.5% savings target). Phase III Implementation Order at 68-70. For PPL, a 5.5% reduction in energy consumption equates to 79,367 MWh. Plan at 2, Table 2. According to the Plan, PPL anticipates exceeding the low-income target by achieving an energy reduction of 88,147 MWh through participation in its two low-income programs.

The OCA will review whether PPL has implemented sufficient programs for its low-income customers. The OCA will also review whether the proposed low-income expenditures and savings are consistent with the Phase III Implementation Order's consumption reduction targets; whether the low-income programs are reasonably designed to be cost-effective and to meet the consumption reduction targets; and whether additional opportunities for coordination and best practices exist to improve upon the Company's proposed low-income programs.

⁴ The Commission's 2016 TRC Order permits EDCs to apply the portion of the savings attributable to low-income occupants in master-metered multifamily buildings toward the low-income savings compliance target. See TRC Test Order at 30.

2. Government/Non-Profit/Educational (GNE)

The Phase III Implementation Order requires that EDCs obtain at least 3.5% of their consumption reduction from the GNE sector.⁵ Phase III Implementation Order at 74-76. For PPL, this requirement equates to a reduction of 50,507 MWh. Plan at 2, Table 2. PPL's Plan is designed to exceed its savings target by achieving a reduction of 81,000 MWh from its GNE sector. Id. The OCA will examine the Phase III Plan to determine whether it meets the specific requirements of the Phase III Implementation Order.

3. Inclusion of Comprehensive Programs

The Phase III Implementation Order requires that all EDCs offer at least one comprehensive program for the residential class and one comprehensive program for the non-residential class. Phase III Implementation Order at 61. Regarding the residential class, PPL proposes to offer the Low-Income WRAP program as the comprehensive program. Plan at 34. The Low-income WRAP program provides qualifying customers with direct-install measures such as in-home audits, weatherization, lighting, and appliance measures. Id. The Phase III Plan also provides that the Energy Efficient Home Program offers a "comprehensive mix of measures" for non-low-income residential customers. See Plan at 34. The OCA notes, however, that the Energy Efficient Home Program is not a comprehensive program as it is currently structured. See PPL Electric St. 1 at 14.

Upon initial review, the OCA is concerned that PPL's only comprehensive residential program is a low-income program that is only available to a small segment of the residential class. In this proceeding, the OCA will examine whether PPL should offer a comprehensive

⁵ Act 129 requires that plans are required to obtain at least 10% of energy savings from the GNE sector. See 66 Pa.C.S. § 2806.1(b)(1)(i)(B). However, the Commission explains in the Phase III Implementation Order that it has the discretion to modify the GNE sector savings target based on the cost-effective savings that can be achieved from that sector. See Phase III Implementation Order at 75.

program that is available to all residential customers. Specifically, the OCA will examine the Energy Efficient Home Program to determine if it would be appropriate to modify this program into a comprehensive program available to all residential customers.

4. Peak Demand Program

The Phase III Implementation Order requires PPL to achieve a peak demand reduction of 92 MW in each of the last four years of the Phase III program. Phase III Implementation Order at 35. To satisfy this requirement, PPL included in its Phase III Plan a Demand Response Program for the non-residential customer sectors. See Plan at 114-120. The proposed Demand Response Program is a load curtailment program through which PPL will offer incentives to customers who reduce their demand during specific curtailment events⁶. Plan at 114. PPL will target non-residential customers who have the ability to curtail at least 100 kW for its demand response program. Id. at 115. Participating customers will be asked to implement their own strategies, such as load shedding or using on-site generators, to reduce load during curtailment events. Plan at 118.

PPL's proposed Demand Response Program is a new program that was not included in Phase II, but is similar to the Load Curtailment Program included in its Phase I EE&C Program. PPL Electric St. 1 at 12. The OCA will examine the proposed Demand Response Program to determine whether it meets the specific requirements of the Phase III Implementation Order. The OCA will also examine whether the inclusion of a demand response program targeted at residential customers would be appropriate at this time.

⁶ The description for curtailment events is provided for in the Commission's Phase III Implementation Order at page 37.

D. Multifamily Housing

The Commission's Phase III Implementation Order does not direct the EDCs to meet specific consumption reduction or budget targets for the multifamily sector. See Phase III Implementation Order at 80. The Commission does note, however, that there appears to be potential in each EDC's service territory for energy savings from multifamily housing, and directs each EDC to coordinate with the SWE to track and provide any data that will be necessary for the SWE to perform an analysis on the multifamily potential at the service territory level in the future. Id.

Unlike PPL's Phase II Plan, which included the Master Metered Low-Income Multifamily Housing Program, PPL does not propose to include a program that specifically targets multifamily housing. PPL proposes to serve multifamily housing customers through a mix of residential programs (i.e., Appliance Recycling, Efficient Lighting, Energy Efficient Home Program, and Low-Income WRAP) and a commercial program (i.e., Efficient Equipment Program). See Plan at 36-52, 63-67, 75-84. The OCA will review PPL's proposal to serve multifamily housing through residential and commercial programs instead of offering a specific program that targets the multifamily target. The OCA will also examine the programs which are available to the multifamily segment, and if warranted, provide recommendations as to how these programs can better serve this segment of customers.

E. Cost Recovery

Pursuant to Act 129 and the Phase III Implementation Order, PPL's total budget for its Phase III Plan is limited to 2% of the Company's total annual revenue as of December 31, 2006. See 66 Pa. C.S. § 2806.1(g); Phase III Implementation Order at 11, n. 23. Additionally, Act 129 requires that program costs must be paid for by the customer class receiving the energy saving

benefits of the program. See 66 Pa. C.S. § 2806.1(a)(11). Each EDC must also provide an estimate of the costs of its Phase III Plan including capital expenditures and administrative costs, and include a proposed cost recovery mechanism. See Phase III Implementation Order at 130-134.

For PPL, the 2% cost cap equates to approximately \$312.5 million over five years, including \$5 million for its share of the SWE. Plan at 163. PPL anticipates using its entire budget to implement its Phase III Plan. Id. The Company proposed to apportion approximately 53% of the Phase III budget to residential and low-income programs. Id. A summary of PPL’s Phase III Plan costs by customer sector is as follows:

Customer Class	Total Phase III Budget	Budget Percent
Residential (including low-income)	\$166,496,775	53%
Small C&I	\$71,877,867	23%
Large C&I	\$50,502,646	16%
Government/Non-profit/Education	\$23,601,863	8%

Source: Plan at 166, Table 93.

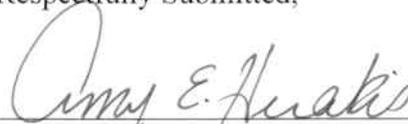
As stated above, Act 129 requires that Phase III EE&C measures be financed by the customer class that receives the direct benefit from the programs. See 66 Pa. C.S. § 2806.1(a)(11). In compliance with this directive, PPL will calculate the costs for each of the customer classes separately. Plan at 167. However, for common costs, such as costs that are applicable to multiple classes or provide system-wide benefits, PPL will assign costs to the separate customer classes using an allocation factor equal to the percentage of the EE&C costs directly assigned to each customer class to the total EE&C costs directly assigned to all customer classes. Plan at 167. PPL will collect the costs of its Phase III Plan through an Act 129 Compliance Rider, ACR 3. See Plan at App. E.

In this proceeding, the OCA will examine PPL's proposed cost allocation of all programs to determine whether the costs are appropriately allocated to the customer classes which will benefit from the programs to ensure there are no subsidies between rate classes. Specifically, the OCA will examine the cost allocation for residential programs that are available to all classes such as the Appliance Recycling Program. The OCA will also review the Company's proposed costs included within the ACR 3 to ensure that those costs are permissible to be recovered under Act 129 and the Phase III Implementation Order.

III. CONCLUSION

The OCA appreciates this opportunity to provide Comments on this important topic. The OCA will also provide the testimony of its expert witnesses in accordance with the schedule established in this proceeding. The OCA will seek to ensure that PPL's Phase III Plan is designed to meet the requirements of the Act and that it does so in a cost-effective and balanced manner.

Respectfully Submitted,



Amy E. Hiras
Assistant Consumer Advocate
PA Attorney I.D. # 310094
E-Mail: Ahirakis@paoca.org

Darryl Lawrence
Senior Assistant Consumer Advocate
PA Attorney I.D. # 93682
E-Mail: DLawrence@paoca.org

Counsel for:
Tanya J. McCloskey
Acting Consumer Advocate

Office of Consumer Advocate
555 Walnut Street
5th Floor, Forum Place
Harrisburg, PA 17101-1923
(717) 783-5048

January 4, 2016

215423

CERTIFICATE OF SERVICE

Petition of PPL Electric Utilities Corporation :
for Approval of its Act 129 Phase III : Docket No. M-2015-2515642
Energy Efficiency and Conservation Plan :

I hereby certify that I have this day served a true copy of the foregoing document, the Office of Consumer Advocate's Comments, upon parties of record in this proceeding in accordance with the requirements of 52 Pa. Code Section 1.54 (relating to service by a participant), in the manner and upon the persons listed below:

Dated this 4th day of January 2016.

SERVICE BY E-MAIL & INTER-OFFICE MAIL

Johnnie Simms, Esq.
Bureau of Investigation and Enforcement
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17120

SERVICE BY E-MAIL and FIRST CLASS MAIL

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

Elizabeth Rose Triscari, Esquire
Office of Small Business Advocate
Commerce Building, Suite 202
300 North Second Street
Harrisburg, PA 17101

David B. MacGregor, Esq.
Post & Schell PC
Four Penn Center
1600 John F. Kennedy Blvd.
Philadelphia, PA 19103-2808

Adeolu A. Bakare, Esquire
Pamela C. Polacek, Esquire
McNees Wallace & Nurick, LLC
100 Pine Street
P.O. Box 1166
Harrisburg, PA 17108-1166

Paul E. Russell, Esquire
PPL Electric Utilities Corporation
Two North Ninth Street
Allentown, PA 18101

Patrick M. Cicero, Esquire
Elizabeth R. Marx, Esquire
Joline Price, Esquire
Pennsylvania Utility Law Project
118 Locust Street
Harrisburg, PA 17101

Julia A. Conover, Esquire
Christopher M. Arfaa, Esquire
Judith D. Cassel, Esquire
Hawke McKeon & Sniscak LLP
100 North Tenth Street
Harrisburg, PA 17101

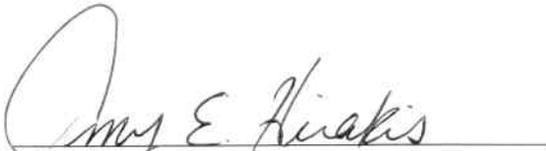
Heather M. Langeland, Esquire
PennFuture
200 First Avenue, Suite 200
Pittsburgh, PA 15222

Derrick P. Williamson, Esquire
Barry A. Naum, Esq.
Spilman Thomas & Battle
1100 Bent Creek Blvd., Suite 101
Mechanicsburg, PA 17050

Joseph L. Vullo, Esquire
Burke Vullo Reilly Roberts
1460 Wyoming Avenue
Forty Fort, PA 18704

Mark C. Morrow, Esquire
Chief Regulatory Counsel
UGI Utilities, Inc.
460 North Gulph Road
King of Prussia, PA 19406

Carl R. Shultz, Esquire
Eckert Seamans Cherin & Mellott, LLC
213 Market Street, 8th Floor
Harrisburg, PA 17101



Amy E. Hirakis
Assistant Consumer Advocate
PA Attorney I.D. # 310094
E-Mail: AHirakis@paoca.org

Darryl A. Lawrence
Senior Assistant Consumer Advocate
PA Attorney I.D. # 93682
E-Mail: DLawrence@paoca.org

Counsel for
Office of Consumer Advocate
555 Walnut Street
5th Floor, Forum Place
Harrisburg, PA 17101-1923
Phone: (717) 783-5048
Fax: (717) 783-7152
214864