

COMMONWEALTH OF PENNSYLVANIA



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January 4, 2016

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17105-3265

Re: Petition of PECO Energy Company for
Approval of its Act 129 Phase III Energy
Efficiency and Conservation Plan
Docket No. M-2015-2515691

Dear Secretary Chiavetta:

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

Copies have been served as indicated on the enclosed Certificate of Service.

Sincerely,

A handwritten signature in cursive script, appearing to read "Lauren M. Burge".

Lauren M. Burge
Assistant Consumer Advocate
PA Attorney I.D. # 311570

Enclosures

cc: Honorable Angela T. Jones
Honorable Darlene D. Heep
Certificate of Service

214846

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Petition of PECO Energy Company :
for Approval of its Act 129 Phase III : Docket No. M-2015-2515691
Energy Efficiency and Conservation Plan :

COMMENTS OF THE
OFFICE OF CONSUMER ADVOCATE

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Dated: January 4, 2016

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I. INTRODUCTION

The Office of Consumer Advocate (OCA) is filing these Comments in accordance with the Notice in the *Pennsylvania Bulletin* published on December 12, 2105. 45 Pa. B. 7078. This filing is in response to the Petition of PECO Energy Company (PECO or the Company) for Approval of its Energy Efficiency and Conservation (EE&C) Phase III Plan. A Prehearing Conference is scheduled for January 12, 2016 before Administrative Law Judges Angela T. Jones and Darlene Heep. At this time, the OCA anticipates that it will serve the written testimony of Geoffrey Crandall¹ and Roger Colton² in this proceeding. The OCA requests that these Comments be read and considered in conjunction with the testimony of its expert witnesses.

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'

¹ Mr. Crandall is a Principal and Vice President of MSB Energy Associates in Middleton, Wisconsin. Mr. Crandall specializes in residential and low-income issues and the impact of energy efficiency and utility restructuring on customers. He has over 35 years of experience in utility regulatory issues, including energy efficiency, conservation and load management resources program design and implementation, resource planning, restructuring, mergers, fuel, purchase power, gas cost recovery, planning analysis and related issues. His experience includes over 15 years of service on the Staff of the Michigan Public Service Commission as an analyst in the Electric Division (Rates and Tariffs), as the Technical Assistant to the Chief of Staff, Supervisor of the Energy Conservation Section and as the Division Director of the Industrial, Commercial and Institutional Division, with the responsibility for the energy efficiency and conservation program design, funding and implementation of Department of Energy and utility-funded programs and initiatives throughout Michigan. Mr. Crandall has provided expert testimony before more than a dozen public utility regulatory bodies throughout the United States, including this Commission, and before the United States Congress on several occasions.

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.

Energy Efficiency and Conservation (EE&C) plans for the period June 1, 2009 through May 31, 2013 were required to meet. See Energy Efficiency and Conservation Program, Docket No. M-2008-2069887 (Order Entered Jan. 16, 2009) (Phase I). 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. See Energy Efficiency and Conservation Program, Docket No. M-2012-2289411 (Order Entered Aug. 2, 2014) (Phase II). 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 Implementation Order, Docket No. M-2014-2424864 (Order entered June 19, 2015) (Phase III Implementation Order). PECO’s Phase III consumption reduction target was set at 5.0% of its expected sales for the June 1, 2009 through May 31, 2010 period.³ The Commission also directed that PECO’s Phase III Plan: (1) achieve 3.5% of its overall consumption reductions come 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

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. PECO’s Plan was designed to achieve this yearly consumption reduction target. See Plan at 20-21.

reduction of at least 161 MW. Id. at 35, 61, 68-70, 74-76. As in Phase I and Phase II, the total resource cost (TRC) test will continue to be used to evaluate each EDC's Plan. Id. at 97-98.

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 Phase III Implementation Order, PECO filed its Plan with the Commission on November 30, 2015. PECO's Plan was published in the *Pennsylvania Bulletin* on December 12, 2015. 45 Pa.B. 7078. The notice required that interested parties file comments on 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 PECO's Plan in accordance with the Commission's Phase III Implementation Order.

B. The Stakeholder Process

In preparation for the Phase III EE&C program, PECO held a series of stakeholder meetings. The purpose of the meetings was to solicit input regarding past successes and aspects of the program that can be improved upon or modified in future phases. The OCA participated in these meetings. 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 161 MW. *Id.* at 35, 61, 68-70, 74-76. Additionally, the Plans 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 5.0% consumption reduction target, PECO'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 PECO's Plan

On November 30, 2015, PECO filed its Petition and Phase III EE&C Plan with the Commission. The Phase III Plan is designed to reduce total energy consumption by 2,100,875 MWh and reduce total demand by 171 MW for the five-year Phase III period from June 1, 2016 through May 31, 2021. Petition at 2-3. To achieve this goal, the Company has proposed a Plan consisting of energy efficiency programs across five customer segments: (1) residential (excluding low-income); (2) residential low-income; (3) small commercial and industrial (C&I); (4) large C&I; and (5) combined heat and power (CHP). Within each program, measures are implemented through one of four delivery pathways – retail, participant-initiated, direct-action, or trade ally – to provide flexibility and various opportunities for customers to take advantage of energy-saving opportunities. Specifically, the Company has proposed the following Solutions for the residential class (excluding low-income): (1) Lighting, Appliances & HVAC; (2) Appliance Recycling; (3) Whole Home; (4) Residential New Construction; and (5) Behavioral. The Company will also target the multifamily housing segment. Petition at 8, 10. The Low-Income program includes Lighting and Whole Home solutions, and allows low-income customers to also participate in the Residential program. Id. at 10. PECO has also proposed a Residential Demand Response (DR) program that includes three Solutions: (1) Direct Load Control (DLC); (2) Smart Thermostat; and (3) Behavioral. Id. at 11.

PECO's portfolio of programs is designed to provide customers with increased flexibility and improved customer experience while also meeting the energy saving goals set forth in the Phase III Implementation Order within the designated expenditure cap of two percent (2%) of 2006 annual revenues (approximately \$85.5 million) for each year of the five year plan. Petition at 1-2; PECO St. 1 at 6. The Plan has budgeted expenditures totaling \$427.4 million which are broken down by class as follows: Residential Energy Efficiency (EE) (exclusive of low-income) - \$100.1 million; Low-Income EE - \$36.1 million; Small C&I EE – \$44.5 million; Large C&I EE - \$55.1 million; and CHP - \$24.9 million. Additionally, budgeted expenditures for demand response programs are projected to be: Residential DR - \$13.7 million; Small C&I DR - \$0.9 million; and Large C&I DR - \$27.1 million. Plan at 16.

PECO will recover its costs through a Phase III Energy Efficiency & Conservation Program Charge (Phase III EEPC). The Company proposes to use the same format as the Company's existing EEPC which recovers costs associated with its Phase II Plan, but to incorporate revisions required by the Phase III Implementation Order. Petition at 14. The EEPC is a fully reconcilable, non-bypassable charge. Id. Initially, the EEPC rates for each class are projected to be as follows:

Class	Projected Rate*
Residential	\$0.00381/kWh
Commercial	\$0.00074/kWh
Industrial	\$0.60/kW
Municipal Lighting	\$0.00513/kWh

*Rate Information from PECO St. 4, Exh. RAS-3.

Phase II costs and revenues will be tracked and reconciled separately from Phase III costs and revenues. Petition at 15. As such, any Phase I and Phase II costs will be clearly identified

and tracked separately for purposes of the EEPC, and will prevent any comingling of Phase III and prior phase costs or revenues in accounting records. Id.

II. PRELIMINARY COMMENTS ON THE PLAN AND PROGRAMS

A. Phase III Residential Customer Energy Efficiency Programs

PECO's Residential Energy Efficiency Programs include the five solutions discussed below: (1) Lighting, Appliance and HVAC Solutions; (2) Residential New Construction Solutions; (3) Whole Home Solutions; (4) Appliance Recycling Solutions; and (5) Behavioral Solutions. PECO projects a TRC score of 2.3 for its Residential EE Program. Plan at 41.

1. Lighting, Appliance and HVAC Solutions

The Lighting, Appliance and HVAC Solutions offer customers energy savings opportunities through a retail pathway that encourages customers to purchase the most efficient technology when they are shopping for new products. This program will provide a combination of cash rebates and upstream or midstream discounts to lower the cost barrier for purchasing high efficiency products. Qualifying products include high efficiency lighting, appliances, electronics, HVAC and water heating equipment. Plan at 34-35.

The OCA will review issues including, but not limited to: (1) whether the proposed measures are reasonably calculated to achieve the proposed savings; (2) whether the proposed measures are cost-effective; (3) whether the Plan reflects changing lighting baselines and strategies for transitioning to new lighting technologies and/or other strategies; and (4) whether appliance eligibility and incentive levels are appropriate and well defined.

2. Residential New Construction Solutions

Through the Residential New Construction Solutions, PECO proposes to work with architects, builders, and contractors to design and promote ENERGY STAR homes and other

new construction standards that have high energy efficiency performance. This can reduce energy consumption in new single family or multifamily homes. These solutions can also be used to encourage customers to replace certain equipment, such as HVAC systems or water heaters, with more efficient systems when working with contractors. Plan at 35-36.

The OCA's review of this program will include examining: (1) whether the proposed measures are reasonably calculated to achieve the proposed savings; and (2) whether the proposed measures are cost-effective.

3. Whole Home Solutions

The Whole Home Solutions offers energy audits and assessments to residential customers, as well as the direct installation of energy efficiency improvements in customer homes at no cost or at a significantly reduced cost to the customer. PECO St. 2 at 6. This program helps to educate customers about the efficiency of their home and to remove cost barriers to installing high efficiency equipment.

The OCA's review of this program will examine: (1) whether the proposed measures are reasonably calculated to achieve the proposed savings; (2) whether the proposed measures are cost-effective; and (3) whether there is any potential double-counting of savings as a result of overlapping measures with other residential programs.

4. Appliance Recycling Solutions

This program encourages residential customers to turn in their older operating appliances to be recycled. Old appliances may be picked up at no cost and customers may receive a rebate to partially offset the cost of new, energy efficient appliances. Products and informational material will be made available to customers through product giveaways, energy kits, an online web store, or opt-in direct mail technology as an option in lieu of rebates. Plan at 36.

The OCA's review of this program will include: (1) whether the appropriate appliances have been included in this program; (2) whether the proposed incentive rebate levels and methods are reasonable and appropriate; (3) whether the proposed measure is reasonably calculated to achieve the proposed savings levels; (4) whether the proposed measure is cost-effective; and (5) whether appropriate quality control measures are being employed to ensure that inefficient appliances are being recycled and are no longer in use.

5. Behavioral Solutions

Through the Behavioral Solutions, the Company will provide both digital and paper versions of home energy reports that compare the customer's electric consumption to the consumption of similar households and makes personalized recommendations for methods to use energy more efficiently. Other tactics that may be used to modify behavior to encourage energy efficiency may include real-time energy displays, social media updates, and community energy competitions. Plan at 36.

The OCA will review this program and address issues including: (1) whether the proposed measures are reasonably calculated to achieve the proposed savings; (2) whether the proposed measures are cost-effective; and (3) whether the proposed savings can be maintained over a period of time.

B. Low-Income Energy Efficiency Program (LEEP)

The Low-Income Energy Efficiency Program provides energy saving opportunities to income qualified customers across all electric end-uses. The primary component of this program is the whole home service, which includes: (1) in-home audits and education, in which auditors assess a home's energy performance, discuss opportunities to reduce energy usage and bills with participants, and provide follow-up communications on the benefits of energy saving measures;

(2) direct installation of energy efficiency measures during the audit process at no charge to residents; and (3) giveaways of low-cost energy saving measures, which are available regardless of whether a customer has participated in other aspects of the program. Plan at 43. The program also includes higher incentives to encourage the purchase of the most efficient technology when shopping for lighting products, as well as participation in the Whole Home Solution to help customers recycle and replace older, inefficient appliances with new ENERGY STAR appliances at no cost to the customer. Id. PECO proposes that it will spend \$36.1 million on this program, and reduce consumption by 123,991 MWh. The Company projects a net TRC score of 1.6 for this program.

The OCA's review of this program will include: (1) whether LEEP savings are consistent with the Phase III Implementation Order target; (2) whether the proposed measures are reasonably calculated to achieve the proposed savings; and (3) whether the proposed measures are cost-effective.

C. Multifamily Housing

PECO's Plan includes a focus on multifamily housing. Customers living in multifamily homes can access energy efficiency measures through the Company's Residential Energy Efficiency Program, or through Small C&I or Large C&I programs, depending on the type of building and whether it is master-metered. PECO St. 2 at 4-5. Low-income families living in multifamily housing will be served directly through the LEEP program. Plan at 43. PECO proposes to specifically target multifamily properties with direct install of Whole Building and Whole Home Solutions in order to provide a variety of options to customers in multifamily buildings. PECO St. 2 at 4-5.

The OCA will review PECO's multifamily program, including: (1) whether the program design addresses energy efficiency barriers that are specific to this market segment; (2) whether there are gaps in program measures which, if closed, would improve program performance; (3) whether allocation of costs and savings is clear; and (4) whether applicable terms and eligibility are clearly and appropriately defined.

D. Residential Demand Response Program

PECO's Residential Demand Response (DR) Program provides customers the ability to receive a credit on their bill in exchange for reducing energy usage during periods of peak demand. PECO St. 2 at 13. PECO has proposed three DR programs for residential customers – Direct Load Control (DLC) Solution, Smart Thermostat Solution, and Behavioral Solution.

The DLC solution is similar to the Company's Phase II Smart AC Saver program. The DLC program allows PECO to remotely cycle or shut down a customer's central air conditioning system on short notice during DR events. PECO St. 2 at 13. PECO projects a reduction in demand of 37.5 MW through this program. Plan at 77.

The Smart Thermostat Solution will use Wi-Fi enabled smart thermostats to allow the Company to increase the set temperature on the thermostat during times of peak demand. PECO can communicate with the thermostat remotely to reduce air conditioner use during the annual peak period from June through September. In turn, customers receive bill credits for allowing PECO to control their equipment. Plan at 77.

The Behavioral Solution is eligible to all customers with Advanced Metering Infrastructure (AMI) data. Customers will receive an alert the day before a DR event, notifying customers and providing actions that customers can take to reduce energy usage during the

event. Participants can then receive financial incentives for reducing energy usage during the DR event. Plan at 77.

The OCA will review the Residential DR programs for issues such as: (1) whether the incentive level is appropriate to encourage customer participation; and (2) whether the program is cost-effective.

E. Miscellaneous Issues

1. Total Plan Spending and Savings

In compliance with the requirements of the Phase III Implementation Order, PECO proposes spending approximately \$427.4 million in Phase III to achieve a total of 2,100,875 MWh of consumption reduction, as compared to PECO's required consumption reduction target of 1,962,659 MWh. PECO also projects 171 MW in demand reduction, as compared to its required demand reduction target of 161 MW. The OCA will review the total Plan spending to ensure that it complies with the mandated spending limit, and that the forecasted Plan costs are reasonable in relation to the incentives provided.

2. Allocation of Expenditures and Savings by Customer Class

PECO's proposed percentage of expenditures and savings by customer class are as follows:

Class	Percentage Spending	Percentage Savings
Residential EE (exclusive of low-income)	23%	35%
Low-Income EE	8%	6%
C&I Small EE	10%	19%
C&I Large EE	13%	23%
CHP	6%	17%

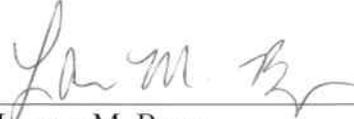
Source: Table 4, Plan at 16; Table 2, Plan at 14.

The OCA will evaluate this proposal to ensure an equitable balance of program spending and savings among the customer classes.

III. CONCLUSION

The OCA appreciates this opportunity to provide these Comments and the testimony of its expert witnesses, Geoffrey Crandall and Roger Colton, on this important topic.

Respectfully Submitted,



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January 4, 2016

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CERTIFICATE OF SERVICE

Petition of PECO Energy Company :
For Approval of its Act 129 Phase III : Docket No. M-2015-2515691
Energy Efficiency and Conservation Plan :

I hereby certify that I have this day served a true copy of the foregoing, 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.

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