



COMMUNITY LEGAL SERVICES
OF PHILADELPHIA

January 23, 2017

VIA ELECTRONIC FILING

Ms. Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
400 North Street
Harrisburg, PA 17120

RE: Petition of NRG Energy, Inc. for Implementation of Electric Generation Supplier
Consolidated Billing, Docket No. **P-2016-2579249**

Dear Secretary Chiavetta:

Enclosed for electronic filing, please find the Comments of Tenant Union Representative Network and Action Alliance of Senior Citizens of Greater Philadelphia (TURN *et al.*), in opposition to the above-captioned petition of NRG Energy, Inc.

A copy of the enclosed Comments are being served pursuant to the enclosed Certificate of Service. Please contact me with any questions or concerns.

Sincerely,

A handwritten signature in black ink, appearing to read 'R. W. Ballenger', with a long horizontal flourish extending to the right.

Robert W. Ballenger

On behalf of TURN *et al.*

Enclosure

Cc: Service List

RBallenger@CLSPHila.org ▪ Direct Dial: 215.981.3788 ▪ Fax: 267.765.6481

WWW.CLSPHILA.ORG

CERTIFICATE OF SERVICE

I hereby certify that this day I served a copy of the Comments of Tenant Union Representative Network and Action Alliance of Senior Citizens of Greater Philadelphia (TURN *et al.*) in the Matter of the Petition of NRG Energy, Inc. for Implementation of Electric Generation Supplier Consolidated Billing, Docket No. P-2016-2579249, upon the persons listed below in the manner indicated in accordance with the requirements of 52 Pa. Code § 1.54.

Via Email and/or First Class Mail

Karen O. Moury
Sarah C. Stoner
Eckert, Seamans, Cherin & Mellott, LLC
213 Market Street, Eighth Floor
Harrisburg, PA 17101
Kmoury@eckertseamans.com
[sstoner@eckertseamans.com](mailto:ss Stoner@eckertseamans.com)
for Petitioner NRG Energy, Inc.

Tanya McCloskey, Esq.
Office of Consumer Advocate
5th Floor, Forum Place
555 Walnut Street
Harrisburg, PA 17101-1923
tmccloskey@paoca.org

John R. Evans, Esq.
Office of Small Business Advocate
300 North Second Street, Suite 202
Harrisburg, PA 17101
jorevan@pa.gov

Legal Department
West Penn Power d/b/a Allegheny Power
800 Cabin Hill Drive
Greensburg PA 15601-1689

Richard Kanaskie, Esq.
Bureau of Investigation and Enforcement
Pennsylvania Public Utility Commission
P.O. Box 3265
Harrisburg, PA 17105-3265
rkanaskie@pa.gov

Regulatory Affairs
Duquesne Light Company
411 Seventh St. MD 16-4
Pittsburgh, PA 15219

Citizens' Electric Company
Attn: EGS Coordination
1775 Industrial Blvd.
Lewisburg, PA 17837

Director of Customer Energy Services
Orange and Rockland Company
390 W. Route 59
Spring Valley, NY 10977-5300

PPL
Attn: Kimberly A. Klock, Esq.
Two North Ninth St.
Allentown, PA 18101
kklock@pplweb.com

Manager Energy Association
PECO Energy Company
2301 Market Street
Philadelphia, PA 19101-8699

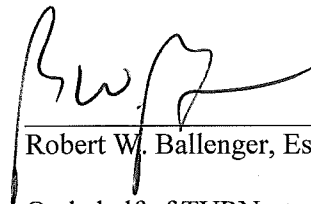
Patrick Cicero, Esq.
Elizabeth Marx, Esq.
Pennsylvania Utility Law Project
118 Locust Street
Harrisburg, PA 17101
pciceroPULP@palegalaid.net
emarxPULP@palegalaid.net

Craig G. Goodman, Esq.
Stacey Rantala
National Energy Marketers Association
333 K Street, NW, Suite 110
Washington, DC 20007
cgoodman@energymarketers.com
srantala@energymarketers.com

UGI Utilities, Inc.
Attn: Rates Dept. – Choice Coordinator
2525 N. 12th Street, Suite 360
P.O. Box 12677
Reading, PA 19612-2677

Wellsboro Electric Company
Attn: EGS Coordination
33 Austin St.
P.O. Box 138
Wellsboro, PA 16901

Charis Mincavage, Esq.
Adeolu A. Bakare, Esq.
McNees, Wallace & Nurick LLC
100 Pine Street
P.O. Box 1166
Harrisburg, PA 17108-1166
cmincavage@mwn.com
abakare@mwn.com



Robert W. Ballenger, Esq.

On behalf of TURN *et al.*

Dated: January 23, 2017

**BEFORE THE PENNSYLVANIA
PUBLIC UTILITY COMMISSION**

PETITION OF NRG ENERGY, INC. : **Docket No: P-2016-2579249**
FOR IMPLEMENTATION OF ELECTRIC :
GENERATION SUPPLIER :
CONSOLIDATED BILLING :

**COMMENTS OF TENANT UNION REPRESENTATIVE NETWORK AND ACTION
ALLIANCE OF SENIOR CITIZENS OF GREATER PHILADELPHIA**

Community Legal Services, Inc.

Counsel for TURN et al.

Robert W. Ballenger, Esquire (Attorney ID. No. 93434)
Josie B. H. Pickens, Esquire (Attorney ID. No. 309422)
1424 Chestnut Street
Philadelphia, PA 19102
Telephone: 215-981-3700

I. INTRODUCTION

Tenant Union Representative Network and Action Alliance of Senior Citizens of Greater Philadelphia (collectively “TURN *et al.*”), through counsel Community Legal Services, Inc., hereby submit these Comments to the Petition of NRG Energy, Inc. for Implementation of Electric Generation Supplier Consolidated Billing (“Petition”). By Notice published in the Pennsylvania Bulletin on December 24, 2016, the Secretary permitted the submission of answers and comments by January 23, 2017, and reply comments by February 22, 2017.

TURN *et al.* strongly oppose NRG’s Petition. Supplier Consolidated Billing (SCB) presents significant risks to customers. The Commission should reject NRG’s Petition, which, if granted, would create customer confusion, undermine essential consumer protections required to be provided by electric distribution companies (EDCs) under the Public Utility Code, and place low-income utility customers at risk of financial harm. Contrary to NRG’s Petition (which contends that “no material issues of fact are presented by this Petition”), TURN *et al.* submit that potential SCB presents significant issues of material fact.¹ To the extent the Commission desires to resolve NRG’s Petition without an on-the-record proceeding, TURN *et al.* submit that the Commission should reject such petition as unsupported and contrary to public interest.

TURN *et al.* are particularly concerned amount the impact of SCB on economically vulnerable households, including the tenants and seniors who are members of TURN and Action Alliance. These customers require immediate access to EDCs, EDC-run utility assistance

¹ Although not addressed directly in these Comments, TURN *et al.* note that NRG includes in Appendix A to its Petition, its proposed resolutions to a plethora of SCB issues identified by the 2010 Electronic Data Exchange Working Group (EDEWEG) over a five-month period in 2010. Although these proposals may be satisfactory to NRG, there is no indication they would be satisfactory to the other participants in EDEWEG or other constituents who would potentially have an interest in that process were it to be undertaken today. Similarly, there is no indication that, given the electricity price spikes in 2014 and the subsequent regulatory actions taken by the Commission, the SCB issues identified in the 2010 EDEWEG report represent the full range of issues that SCB would need to address.

programs, the PUC, LIHEAP and other utility assistance to avoid loss of service. For these customers, SCB would represent a confusing barrier that may be insurmountable in the event of financial distress or a household emergency.

TURN *et al.* also find NRG's professed need for SCB to facilitate relationships with customers and provision of products and services implausible. To the contrary, NRG may use other means to establish relationships with customers, if desired. Furthermore, NRG has provided inadequate support for the proposition that Utility Consolidated Billing (UCB) prohibits NRG or any supplier from providing such products or services, if customers desire them.

For the reasons set forth more fully below, TURN *et al.* urge the Commission to deny NRG's Petition, as the implementation of SCB constitutes an unnecessary and confusing change that will negatively impact customers and erode essential consumer protections. NRG may take other steps to improve upon its relationship with customers without fundamentally restructuring how customers pay for electricity.

II. BACKGROUND

On December 8, 2016, NRG filed its Petition for Implementation of Electric Generation Supplier Consolidated Billing. NRG submits that all the relevant issues to its Petition are legal or policy in nature, and so no evidentiary hearings are necessary.² NRG proposes the Commission announce a goal of implementing SCB, provide policy guidance in response to NRG's description of the implementation issues with SCB identified by EDEWEG in 2010, direct EDEWEG to establish electronic data interchange (EDI) protocols to complete SCB, and address "various operational issues" outlined by NRG.³ Nodding to the multitude of customer

² Id. at ¶69.

³ Petition at ¶71.

service issues SCB presents, NRG suggests that changes to customer service regulations at Chapter 56 of Title 52 of the Pennsylvania Code will be necessary, and suggests that the Office of Competitive Market Oversight (OCMO) should convene a stakeholder group to address these issues and other issues associated with SCB.⁴ Thereafter, NRG submits that the Commission should issue an implementation order, resolving all of the issues addressed by the stakeholder group, and directing the filing of compliance plans and take other rulemaking steps as are necessary to move forward with SCB.⁵ Finally, NRG requests that the Commission enter an order implementing SCB by the second quarter of 2018.⁶ TURN *et al.* oppose these proposals.

III. NRG’s Petition Raises Substantial Issues of Fact, Which Cannot Be Resolved Via a Notice and Comment Proceeding.

TURN *et al.* disagree with NRG’s statement that its Petition raises no factual issues requiring hearings. If the Commission decides to move forward with SCB, there are extensive factual issues requiring in-depth analysis and exploration in an on-the-record proceeding. Although NRG identifies several “operational issues” for the Commission’s consideration and resolution,⁷ it fails to address core factual concerns that its proposal implicates, regarding the extensive customer confusion, disruption and degradation of service quality, and customer harms that will flow from interjecting EGSs into the billing and complaint processes, traditionally handled by EDCs. NRG also fails to address the fact that implementing SCB will inevitably create additional costs to EGSs and EDCs (and by extension customers), from the duplication of customer service functions by EDCs and EGSs. NRG fails to address whether, given these additional costs, its SCB proposal would even be practical for some EGSs, who may not desire to

⁴ Petition at ¶72.

⁵ Petition at ¶73.

⁶ Petition at ¶75.

⁷ Petition at ¶37.

invest in these customer service obligations. Ultimately, because EDCs cannot, under Pennsylvania law, disregard the customer service functions required of them, including those functions relating to complaints filed with the Commission (66 Pa. C.S. § 1410) and obligations upon customer contact (66 Pa. C.S. § 1410.1), SCB necessarily generates increased costs to customers due to the need to maintain duplicative customer service functions at EDCs and EGSs.

A. SCB Would Result In Customer Confusion, Increasingly Placing Low-Income Customers at Risk of Loss of Service.

In a recent review of SCB conducted by the Connecticut Public Utilities Regulatory Authority (PURA), these core factual concerns regarding customer confusion were central to PURA's decision to recommend to the Connecticut General Assembly that further analysis be conducted regarding the complexities of moving forward with SCB.⁸ PURA concluded that shifting billing responsibilities from EDCs to EGSs would "very likely increase customer confusion and decrease customer satisfaction."⁹ TURN *et al.* submit that the same conclusion must be reached regarding NRG's proposal in Pennsylvania.

Customers in need of bill payment assistance, low-income program benefits, payment agreements, weatherization treatment, resolution of billing inquiries and disputes, restoration and discontinuance of service, and a host of other service-related needs must continue to turn to EDCs, who have *statutory, not simply regulatory, service obligations* to fulfill.¹⁰ To have these customers directed first to the EGS, only to be redirected to EDCs is a waste of time, creating additional administrative expense, delaying resolution of customer service issues, and placing

⁸ Decision in the Matter of PURA Review of the Billing of All Components of Electric Service by Electric Suppliers, Docket No. 13-08-15 (August 6, 2014) (PURA SCB Decision). Notably, Reliant Energy, a subsidiary of NRG, was a participant in PURA's proceeding according to page 5 of the service list. A copy of the PURA SCB Decision, and appended service list, is available at: [http://www.dpuc.state.ct.us/dockcurr.nsf/8e6fc37a54110e3e852576190052b64d/4a2f8ff062aae30d85257d2c005be6fb/\\$FILE/FINAL130815%20Revised%20Draft.docx](http://www.dpuc.state.ct.us/dockcurr.nsf/8e6fc37a54110e3e852576190052b64d/4a2f8ff062aae30d85257d2c005be6fb/$FILE/FINAL130815%20Revised%20Draft.docx)

⁹ PURA SCB Decision, at 6.

¹⁰ See, e.g., 66 Pa. C.S. § 2807(d).

customers in harm's way. TURN *et al.* submit that the low-income tenant and senior customers who are their members require immediate contact with EDC personnel in the event of a threatened or actual shut-off, and that these customers may lack the resources to make multiple contacts (e.g., limitation on the use of prepaid cell phone service) through which to seek resolution of these urgent needs. Interjecting EGSs as the de facto contact for all billing inquiries and complaints creates significant risk that customers will incur unnecessary and unwarranted service interruptions that would otherwise be avoided.

In addition, NRG incorrectly submits that "SCB will not impact customer eligibility for LIHEAP assistance."¹¹ As a practical matter, many customers are encouraged or assisted in applying for LIHEAP benefits through the customer service function performed by EDCs. More importantly, however, the LIHEAP program is structured to provide bill payment assistance through vendor agreements with utility companies, who provide vital information to Pennsylvania's Department of Human Services (DHS) in the administration of LIHEAP. SCB would create a significant prospect of confusion at DHS assistance offices since EGSs are not authorized to be LIHEAP vendors.¹² While NRG acknowledges the EDC will continue to be the LIHEAP vendor,¹³ it fails to recognize the obvious impediment to directing a LIHEAP grant to an EDC when the billing entity is an EGS.¹⁴ Just as eligibility for LIHEAP generally will be

¹¹ Petition at Appendix A, p. 2.

¹² See 2017 LIHEAP State Plan § 601.3 ("Vendor – An agent or company that directly distributes home-heating energy or service in exchange for payment. The term does not include landlords, housing authorities, hotel managers or proprietors, rental agents, energy suppliers or generators, and other parties who are not direct distributors of home-heating energy or service.")

¹³ Petition at Appendix A, p. 2. ("EDCs can continue receiving the grants and pass them through the EDI transaction.")

¹⁴ See, e.g., Comments in Response to Staff Discussion Document on End-State Default Service Models, submitted by AARP, PULP and CLS, April 4, 2012, at 14 (available at http://www.puc.state.pa.us/electric/pdf/RetailMI/EnBanc032112_Comments-AARP.pdf) ("CAP customers are required to apply for LIHEAP and designate the entity administering CAP as the recipient of the LIHEAP grant. However, there would appear to be an inability for a CAP participant to designate LIHEAP directly to a vendor if the billing entity is an energy supplier or generator. Furthermore, the majority of low-income LIHEAP recipients, who are not on CAP, have the same inability to designate an EGS or supplier as the LIHEAP vendor.")

impacted by this confusion, the eligibility for LIHEAP Crisis benefits, which are paid within a 48 hour period, is likely to be delayed. Under SCB, customers seeking LIHEAP Crisis benefits will invariably call the EGS that bills them, only to be directed to the EDC to obtain a termination notice or credit denial statement necessary to qualify for Crisis. Again, the delay caused by SCB will present immediate health and safety risks for low-income customers.

NRG also proposes that low-income programs be administered by EDCs, with the amount of discounts communicated to EGSs for billing purposes. TURN *et al.* submit that EGSs cannot function in a billing role for CAP due to the role of the EDC in addressing affordability as a billing and payment matter, with the EDC having a statutory obligation to identify customers who are eligible for CAP. 66 Pa. C.S. § 1410.1(2). Moreover, NRG appears to fail to take into account the future enrollment of new customers, and new CAP arrearages, in an EDC CAP program, and how these arrearages would be addressed (or not) under SCB. In fact, NRG's "Enrollment/Drop Block Mechanism," set forth in paragraph 37(e) of its Petition, if operationalized, would preempt future CAP enrollment entirely, holding a customer who is indebted to an EGS hostage until he or she is capable of repaying unaffordable bills, rather than enrolling the customer in CAP and providing arrearage forgiveness.

Ultimately, one of the main products NRG appears interested in providing is prepaid electric service,¹⁵ which TURN *et al.* opposes. TURN *et al.* oppose prepaid electric service, whether provided by an EDC or an EGS, for the reasons set forth in their December 15, 2016 Comments regarding PECO Energy Company's Pilot Plan for Advance Payments Program and Petition for Temporary Waiver of Portions of the Commission's Regulations with Respect to that Plan, Docket No. P-2016-2573023 (TURN Prepaid Comments). As set forth therein, prepaid service eliminates statutory rights to pre-termination notification, eliminates protection from

¹⁵ Petition at ¶49.

winter termination for eligible customers, eliminates participants' rights to forego payment for disputed charges and preserve service during the pendency of the dispute process, and does not guarantee compliance with medical certification requirements.¹⁶ TURN *et al.* respectfully submit that prepaid service provided by EGSs presents an even greater risk than EDC prepaid service, due to the Commonwealth Court's interpretation of the Choice Act as precluding the PUC from regulating EGS rates,¹⁷ and that low-income customers will face additional service disruptions as a result of products EGSs may desire to market with SCB.¹⁸

B. EGSs Desires to Improve Customer Relations and Offer New Products Do Not Support Implementation of SCB.

NRG submits that EGSs should be afforded the opportunity to bill customers directly for goods and services, astoundingly comparing the purchase of vital electric service at a customer's home to the purchase of light bulbs at a store.¹⁹ The comparison is strikingly inappropriate, given the extensive and justified regulation of the relationship between customers and utilities, including the utility's duty to serve, which does not apply to a neighborhood hardware store, nor to an EGS.²⁰ Regardless, NRG's submission that it requires SCB as an essential means to develop meaningful customer relationships, and offer certain products and services, lacks merit.

¹⁶ TURN Prepaid Comments at 7-17.

¹⁷ Coalition for Affordable Utility Service and Energy Efficiency in PA, et al. v. Pa. PUC, 120 A.3d 1087, at 1101 (Pa. Cmwlth. 2015) ("the PUC may not review EGS rates to determine whether the rates are 'just and reasonable.'")

¹⁸ PECO's Pilot Plan has been referred to the Office of Administrative Law Judge and will now be subject to an on-the-record proceeding to determine whether the Pilot Plan will proceed.

¹⁹ Petition at ¶ 23, 27.

²⁰ See, e.g., Borough of Ambridge v. P.S.C., 165 A.47, 48 (PA. Super. 1933) ("Those engaged in a public calling have always been under the extraordinary duty to serve all comers, while those in a private business may always refuse to sell if they please. So great a distinction as this constitutes a difference in kind of legal control rather than merely one of degree."); see also, New York & Queens Gas Co. v. McCall, 245 U.S. 345, 351 (1917) ("Corporations which devote their property to a public use may not pick and choose, serving only the portions of the territory covered by their franchises which it is presently profitable for them to serve and restricting the development of the remaining portions by leaving their inhabitants in discomfort without the service which they alone can render.")

NRG complains that SCB is necessary for EGSs to “build trust” with customers,²¹ “create and maintain an ongoing relationship with [EGS] customers,”²² and suggests that EGSs cannot “establish themselves as legitimate, reliable businesses capable of offering customers a value proposition beyond price,”²³ if SCB is not implemented. NRG fails to consider that EGSs, like EDCs, have a variety of tools at their disposal to create relationships with customers beyond the billing relationship. NRG provides no evidence that EGSs are prohibited from establishing and maintaining customer relationships through direct mail, electronic mail, telephone contacts, newsletters, customer surveys, or any of the variety of voluntary activities undertaken routinely by businesses seeking to establish relationships with new customers in every corner of Pennsylvania. In fact, NRG recognizes that corporate citizenship is one driver of customer satisfaction,²⁴ but does not provide any information on how UCB hinders EGS efforts to become good corporate citizens. As Connecticut’s PURA correctly observed:

The Authority disagrees with SCB supporters who imply that the only way to address Supplier concerns with UCB is by offering SCB for the following reasons....Suppliers always have the opportunity to interface with their customers and market their products and services through numerous means. Suppliers could improve customer education and communication from the time the customer begins purchasing Service.²⁵

Similarly, the Commission should not find any merit in NRG’s claims that SCB is necessary for it to market new and innovative products and services.²⁶ First and foremost, as a threshold matter, it must be observed that the primary legislative purposes of the Electricity Generation Customer Choice and Competition Act (Choice Act), are to permit competitive forces to effectively control *the cost* of generating electricity,²⁷ for the benefit of all classes of

²¹ Petition at ¶44.

²² Petition at ¶48.

²³ Petition at ¶46.

²⁴ Petition at 23, n.78.

²⁵ PURA SCB Decision at 6.

²⁶ Petition at ¶ 48.

²⁷ 66 Pa. C.S. § 2802(5).

customers,²⁸ while ensuring such service (essential to the health and well-being of residents) remains available to all customers on reasonable terms and conditions,²⁹ and maintaining, at a minimum, the “protections, policies and services that now assist customers who are low-income to afford electric service.”³⁰ The Choice Act was not intended simply to foster the provision of prepaid electricity at great consumer risk or to market so-called value-added products by EGSs, regardless of their impact on customer bills. Rather, the Choice Act’s primary purpose is to enable all customers to benefit from lower costs, while securing essential consumer protections.

Ultimately, NRG fails to credibly demonstrate that UCB is responsible for EGSs purported inability to market new and innovative products and services. As Connecticut’s PURA observed:

If the products, pricing and services are limited by the current UCB, the Supplier has the option to bill its customers directly under a dual billing option. This dual billing option is a tool for Suppliers to perform customized billing and rate structures. Potential customers could weigh the service under a single UCB bill versus those billed under the dual billing option.³¹

At a minimum, in order for NRG to demonstrate that UCB is the cause of its woes, NRG should produce some evidence that EGSs have fared better at marketing these supposed innovative products and services in electric service territories where dual billing is in place. NRG not only fails to mention any such evidence, but also fails to even make a claim that UCB, compared to dual billing, has disadvantaged EGSs.

²⁸ 66 Pa. C.S. § 2802(6).

²⁹ 66 Pa. C.S. § 2802(9).

³⁰ 66 Pa. C.S. § 2802(10)

³¹ PURA SCB Decision at 6.

C. The Commission Should Find That NRG Failed to Identify Any Legitimate Upside to Customers of Implementing SCB.

NRG flatly submits there is a “lack of any legitimate downsides” to SCB.³² As set forth herein, NRG’s claim is simply incorrect. In fact, given the significant likelihood of extensive customer confusion, disruption and degradation of service quality, and customer harms that will flow from interjecting EGSs into the billing and complaint processes, traditionally handled by EDCs, TURN *et al.* submits that the Commission should conclude that SCB presents *no legitimate upside* for customers.

Such a finding would be consistent with the conclusions reached by Connecticut’s PURA, upon review of substantially the same claims NRG makes in its Petition. As PURA concluded:

The billing of all electric services by a multitude of Suppliers at this time does not seem practical. The reasons are numerous. First, and foremost, there does not appear to be real benefits to ratepayers. If the desired result is to offer ratepayers the convenience of a single electric bill, the UCB is the most administratively and perhaps cost efficient way to provide this benefit. Second, while there is interest among some Suppliers who participated in this proceeding to provide SCB, the lack of Supplier participation in this proceeding seems to infer that to many, especially smaller companies, the interest in SCB is also lacking. Requiring the EDCs to make the necessary and potentially costly changes to their respective customer information systems and other processes to accommodate SCB for a small number of interested Suppliers would not be practical. Third, the billing components of electric service consist of numerous charges, the vast majority of which are for services provided or administered by the EDCs. These EDC charges are very complex with some having annual or semi-annual reconciliation mechanisms. Fourth, while the costs are unknown, it appears likely that enabling the EDCs to transfer the necessary billing information and for the Suppliers to obtain the necessary resources to successfully assume the billing responsibility could be costly to the EDCs and Suppliers and ultimately, to ratepayers. Fifth, other options exist for Suppliers to achieve the same or similar desired result. Finally, given the responsibilities that the EDCs have for billing aspects, such as meter installation and reading, bill inserts, and implementing rate

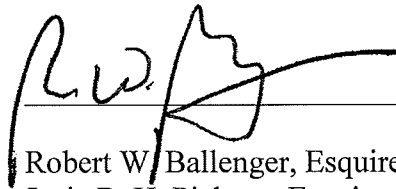
³² Petition at ¶63.

changes, transferring the billing responsibilities to entities that have no responsibilities in these matters seems ill advised.³³

II. CONCLUSION

For the reasons set forth in these Comments, TURN *et al.* urge the Commission to reject NRG's Petition in its entirety. In the alternative, TURN *et al.* submit that there are significant factual disputes concerning the merits, or lack thereof, of SCB, and that NRG's Petition should be referred to the Office of Administrative Law Judge in order to commence an on-the-record proceeding.

Respectfully Submitted,



Robert W. Ballenger, Esquire (Attorney ID. No. 93434)
Josie B. H. Pickens, Esquire (Attorney ID. No. 309422)
Counsel for TURN *et al.*
Community Legal Services, Inc.
1424 Chestnut Street
Philadelphia, PA 19102
rballenger@clsphila.org
jpickens@clsphila.org
(215) 981-3700

Dated: January 23, 2017

³³ PURA SCB Decision at 7.