

COMMONWEALTH OF PENNSYLVANIA



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November 2, 2018

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

Re: Implementation of Chapter 32 of the Public
Utility Code Re Pittsburgh Water and Sewer
Authority
Docket Nos. M-2018-2640802 (water)
M-2018-2640803 (wastewater)

Dear Secretary Chiavetta:

Attached for electronic filing are the Comments of the Office of Consumer Advocate in the above-referenced proceeding.

Copies have been served per the attached Certificate of Service.

Respectfully submitted,

A handwritten signature in cursive script that reads "Christ Maloni Hoover".

Christine Maloni Hoover
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Enclosures:

cc: Office of Administrative Law Judge
Certificate of Service
*261918

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Implementation of Chapter 32 of the	:	Docket No. M-2018-2640802 (water)
Public Utility Code Re Pittsburgh Water	:	Docket No. M-2018-2640803 (wastewater)
And Sewer Authority	:	

**COMMENTS OF THE
OFFICE OF CONSUMER ADVOCATE
TO THE COMPLIANCE PLAN FOR
PITTSBURGH WATER AND SEWER AUTHORITY**

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DATED: November 2, 2018

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I. INTRODUCTION

On December 21, 2017, Governor Wolf signed Act 65 of 2017 into law. Act 65 amended the Public Utility Code by adding new language to 66 Pa. C.S. § 1301 and creating a new Chapter 32, which has the effect of bringing the Pittsburgh Water and Sewer Authority (PWSA or the Authority) under the jurisdiction of the Pennsylvania Public Utility Commission (Commission). On January 18, 2018, the Commission issued a Tentative Implementation Order laying out a proposed process for implementing Chapter 32, including tariff approval, ratemaking, compliance plan, and assessment provisions.¹ The Office of Consumer Advocate (OCA) and other stakeholders provided comments and on March 15, 2018, the Commission entered a Final Implementation Order (FIO).² PWSA filed its first rate proceedings on July 2, 2018. The OCA filed a formal complaint and is actively participating in the rate proceedings. On September 26, 2018, the Commission issued a Secretarial Letter setting forth the time frame and process that it will use for the Compliance Plan. In accordance with Act 65 and the FIO, PWSA filed its Compliance Plan and Long Term Infrastructure Improvement Plan (LTIIP) on September 28, 2018. The OCA filed an Answer to the Petition for Approval of the Compliance Plan and a Notice of Intervention and Public Statement. The OCA also filed Comments to the LTIIP on October 29, 2018.

The OCA appreciates the opportunity to submit comments on the Compliance Plan as PWSA continues its transition to full compliance with Commission regulations. The OCA will actively participate in the Compliance Plan and LTIIP proceedings involving PWSA and will

¹ Implementation of Chapter 32 of the Public Utility Code Re Pittsburgh Water and Sewer Authority, Tentative Implementation Order, Docket Nos. M-2018-2640802 (water) and M-2018-2640803 (wastewater) (Order entered Jan. 18, 2018).

² Implementation of Chapter 32 of the Public Utility Code, Final Implementation Order, Docket Nos. M-2018-2640802 (water) and M-2018-2640803 (wastewater) (Order entered Mar. 15, 2018).

represent the interests of PWSA's customers before the PUC in order to ensure that customers receive high quality water and wastewater service at reasonable rates. In general, the OCA notes that some of its comments below are preliminary in nature or serve to highlight the OCA's concerns about issues that may arise. The OCA looks forward to working with the Commission, PWSA, and stakeholders as PWSA continues its transition and proposes how to bring all aspects of its operations into compliance with the requirements of the Public Utility Code and the applicable rules, regulations and orders of the Commission.

II. COMMENTS

As discussed below, the OCA has identified a number of issues with the Compliance Plan. The issues range from areas where PWSA asserts that it is in compliance with Commission regulations, where PWSA sets forth a timeline that may not be reasonable, and issues that the Compliance Plan has failed to address.

A. Compliance with Chapter 56

In its Compliance Plan, PWSA asserts that its customer service practices are “almost entirely in compliance” with provisions contained in Chapter 56 of the Commission’s regulations. Compliance Plan at 31-32. Table 1 on page 34-35 of the Compliance Plan identifies those provisions of the Commission’s regulations with which PWSA claims it is currently in compliance. Table 4 on pages 37-38 lists the provisions of Chapter 56 by section number and identifies the compliance time frames. PWSA indicates that most of these requirements are complied with as a result of its Official Tariff filing and attached PWSA regulations. However, there is no specific reference to any tariff or regulation or internal policy that documents how compliance with each of these provisions has been accomplished. Other than summarizing the Chapter 56 provisions listed below, PWSA does not discuss any of these listed items in detail or identify how or where it has concluded that its internal policies, regulations and tariffs ensure compliance with each of these provisions.

Further, the OCA does not agree with PWSA’s assessment of its current compliance with Chapter 56. See Compliance Plan, Tables 1 and 4. Many or most of these items have been addressed in testimony by OCA and other parties in the pending PWSA rate proceedings. The testimony identifies deficiencies in PWSA’s compliance, including termination procedures,

payment arrangement policies, complaint handling, bill content, and termination notice deficiencies. Some of the OCA's specific concerns are addressed below.

PWSA indicates that it is currently in compliance with all billing and payment standards in Chapter 56 except the bill content required by Section 56.15. Compliance Plan at 38-39. PWSA does not identify specifically how its current bill does not conform to these minimum disclosures, but states that it will "complete a bill redesign project by the end of 2019," referencing a pending request for a response from their mail and print vendors. Id. at 39. The discussion does not identify exactly what is missing from the current bill or the criteria given to PWSA's vendors to respond to the missing required information. The Compliance Plan does not include any information on the timetable or interim milestones to ensure that the bill will conform to the required information except that it will do so by "end of 2019."

PWSA also asserts that it is compliant with all Chapter 56 provisions applicable to the termination of water and wastewater service except for the lack of Spanish language versions for the termination notice. Compliance Plan at 40 ("The only exception is 56.91(17), which stipulates that information in Spanish directing Spanish-speaking customers to the numbers to call for translation assistance should be included"); Compliance Plan at 45 (52 Pa. Code § 56.331(13)). This statement does not recognize the deficiencies in the termination notices identified in the current rate case proceedings. See OCA St. 3 at 7-8, 16-18 (Docket Nos. R-2018-3002645 (water) and R-2018-3002647 (wastewater)). Similarly, this statement also fails to recognize issues raised in the current rate proceedings regarding non-compliant practices, *e.g.*, obligation to attempt contact at the premises. Id. at 8, 17-18

PWSA's Compliance Plan also does not contain any reference to or discussion of the role of Jordan Tax Service and the lien process in the collection of residential overdue bills. These

policies, which are referenced in the Authority’s tariffs, conflict with the obligations of a public utility to collect bills, assess charges, and offer options for payment plans to residential customers. The OCA and Pittsburgh UNITED raised significant concerns about PWSA’s current collection process and its compliance with Commission regulations in the base rate proceeding, but the Compliance Plan does not address these issues.³ See OCA St. 3 at 7-8, 12-13, 16-17; Pittsburgh UNITED St. 2 at 33-38 (Docket Nos. R-2018-3002645 (water) and R-2018-3002647 (wastewater)).

As part of its Compliance Plan, PWSA filed a document as Appendix A, *Focusing on the Future*. This document describes internal management changes and internal reporting requirements, some of which relate to customer service performance. In the “Respond to Customers and Stakeholders in a Responsive Manner” section, three objectives are listed:

- Develop Standard Operating Procedures (SOPs) and standard scripts for effectively managing common types of customer contacts
- Provide customer service staff with additional training and call monitoring
- Increase call center resources to meet call volumes and achieve target performance goals

Compliance Plan, App. A at 10. To respond to these objectives, PWSA lists three “measures of success” and “target performance.”

MEASURE OF SUCCESS		TARGET PERFORMANCE
Less than 5% of calls abandoned	→	Average answer speed of less than three minutes
Reduce call abandonment	→	Less than 3% of calls abandoned
Minimize customer complaints	→	Less than 5.9 complaints per 1,000 accounts annually

³ In the rate case, PWSA has maintained that its current collections practices are legal and appropriate. See PWSA St. 4-R at 72-80 (Docket Nos. R-2018-3002645 (water) and R-2018-3002647 (wastewater)).

These performance measures and goals have not been integrated into the PWSA rate filing or linked to any incentives or penalties to ensure compliance. At a minimum, the reasonableness of the performance standards should be explored.

Table 2 on page 35 of the Compliance Plan lists those items with which PWSA states it will comply within six months. These items reflect obligations in Chapters 65, 69, and 101. PWSA's Table 3 (page 35-36) provides a lengthy list of standards that the Authority states will require "longer than six months" for it to begin meeting. In the OCA's view, the list of non-compliance items may be incomplete and may not fully reflect the non-compliant items identified in OCA and Pittsburgh UNITED's testimony in the base rate proceedings. See OCA St. 3; Pittsburgh UNITED St. 2 (Docket Nos. R-2018-3002645 (water) and R-2018-3002647 (wastewater)).

B. Compliance with Chapter 65

Regarding Section 65.6 (Pressures), PWSA states that it is aware of areas where pressures exceed 150 psi and that "[t]hese areas will be more difficult to address due to the topography of the service area(s)." Compliance Plan at 53. PWSA should consider reducing static pressures in the main to 125 psi (not 150 psi) or provide and install a pressure reducing valve in the customer service line that reduces the static pressure to below 125 psi.

PWSA states that it has approximately 81,000 service lines to residential, commercial and industrial customers. Compliance Plan at 12. Of those 81,000 connections, PWSA estimates that it has as many as 50,000 meters that have exceeded the time allowed in the Commission's recommended testing schedule and will need to be tested and replaced. Id. at 57. The Authority also states that it employs 14 full-time plumbers, but will need up to an additional 8-12 personnel dedicated to working through the 50,000 overdue meters that require testing and change-out, at a

rate of approximately 5,000-6,000 meters per year, and dedicated to meeting the ongoing testing requirements. Id. at 57-58. PWSA states that it intends to comply with the testing timelines laid out in Section 65.8 and anticipates being in compliance by 2022. Id. at 58. To test/replace 81,000 meters in 20 years, at least approximately 4,050 meters must be tested/replaced per year. Since 61% (50,000/81,000) of the meters are presently over 20 years old, PWSA should be testing/replacing approximately 11,550 $[(31,000/20) + (50,000/5)]$ meters per year to be in compliance within 5 years. Testing/replacing 6,000 meters thru 2022 (4 years) would only test 24,000 meters.⁴

PWSA states that it does not currently maintain a comprehensive flushing program, as required by Section 65.18. Compliance Plan at 65-66. It states that the initial phase of its flushing program commenced in September 2018. PWSA states that it intends to continue flushing throughout the year and in future years to ensure that the distribution system meets the compliance requirements. Id. at 66. The OCA recommends that PWSA develop a plan to flush the entire distribution system at a minimum every two years.

PWSA also states that it will review its existing system to ensure there are ample valves to meet the requirements of § 65.18(c)(3). Compliance Plan at 66. PWSA concluded that “additional field effort is required, and is included as part of the 2019 Valve Replacement program to increase the number of valves inspected and operated per year to ensure there are an adequate number of functional valves.” The OCA recommends that, if a valve cannot be exercised, it should be repaired or replaced. The Pennsylvania Department of Environmental

⁴ The OCA notes that in its proposed LTIP, PWSA indicates that it will test and/or replace 50,000 meters during five years. LTIP at 25 (Section 2.3.6).

Protection (DEP) has a requirement that isolation valves should be every 500 feet (commercial areas) and 800 feet in other areas.⁵

C. Compliance with Policy Statement on Customer Assistance Programs

The Compliance Plan details PWSA's current Customer Assistance Program (CAP) which includes the recently implemented Bill Discount Program, winter shut-off moratorium, Hardship Program, and Private Lead Line Replacement Community Environmental Project. Compliance Plan at 75-76. While these programs are an important first step, the OCA submits that a detailed review of the Authority's universal service programs should be included as part of the Compliance Plan proceeding.

As the OCA explained in its testimony in the rate case proceeding, there is a significant need for an affordability program in PWSA's service territory, even if such programs are not statutorily mandated. The affordability programs in the energy industry pre-dated any statute and were imposed by the Commission without explicit statutory authority. The Company has a need to ensure that it collects its revenues, particularly in light of the necessary investments in infrastructure and environmental compliance obligations. Adopting an affordability program will improve the collectability of receipts.

PWSA's current CAP, while a good first step, does not adequately address underlying unaffordability issues. For example, the design of the Bill Discount Program could be greatly improved by using a more targeted approach, rather than a flat discount. Additionally, enrollment in the program is currently lower than would be expected. Through the Compliance Plan, PWSA should take steps to identify low-income customers and improve outreach and

⁵ Pa. DEP Public Water Supply Manual (383-2125-108) – Part II, Community System Design Standards at 187 (May 6, 2007), available at <http://www.depgreenport.state.pa.us/elibrary/GetFolder?FolderID=4659>.

enrollment in these programs. Other important elements of CAP that should be considered as part of this proceeding include:

- Arrearage Forgiveness Program - PWSA's current CAP has participants with significant arrears, and PWSA still disconnects service to a substantial number of customers enrolled in the Bill Discount Program. Even with the bill discount, total payments are still unaffordable.
- PWSA's bill discount must take into account ALCOSAN charges.
- PWSA should implement other low-income assistance programs that would allow customers to pay their bills on a full and timely basis (or to repay arrearages to the extent not made subject to a forgiveness program), including payment plans and budget billing.
- Hardship Fund – PWSA should improve the design of this program and determine adequate funding levels as part of this proceeding.
- Water Conservation Program – PWSA should develop a conservation program to assist customers with high usage, including development of a “needs assessment” for income-based conservation investments, and should tie its conservation investments to its needs assessment.
- More generally, PWSA should engage in some fundamental planning and data collection processes that will assist its identification and treatment of low-income issues, including:
 - Establishing data-based objectives on collections performance.
 - Determining the efficacy of “traditional” collection techniques.
 - Undertaking customer segmentation studies.
 - Inquiring into why people do/do not complete payment plans; respond to disconnect notices, etc.

D. Compliance with Chapter 71

Regarding Chapter 71 financial reports, PWSA states that it won't be able to include return on assets or equity detail in its filing. Compliance Plan at 80. Due to its alternative ratemaking methodology and the issues surrounding its claim for non-expense items in the base rate proceeding, the OCA recommends that the Chapter 71 reports to be filed by PWSA include: 1) the transfer to or from the reserves; 2) the amount of the City payment; 3) the actual amount of PAYGO in the period; and 4) the actual debt service.

E. Other Compliance Issues

The Authority addresses its service contract with the City of Pittsburgh on pages 105-107 of the Compliance Plan. No details are provided about possible revisions to the agreement with the City. The OCA supports the principle stated on page 106 that the agreement should reflect "actual services provided and the fair market value of those services," including the requirement that the City provide invoices to PWSA detailing those services.

On page 106, PWSA states: "It is anticipated that the revised Cooperation Agreement discussions will also address public fire protection." No further information is provided. The OCA and other parties discussed this issue in detail in the rate case, explaining why it is imperative for PWSA to charge the City for public fire protection service. See OCA St. 2 at 8-11; I&E St. No. 3 at 17-19 (Docket Nos. R-2018-3002645 (water) and R-2018-3002647 (wastewater)). Under 66 Pa. C.S. § 1328, the charges should approximate 25% of the cost of providing the service, but PWSA's cost-of-service study did not even attempt to determine the cost of providing the service.

On page 107, PWSA suggests that if negotiations with the City are not completed by the end of 2018, the Commission could consider using its power under 66 Pa. C.S. § 508 to vary or

reform the agreement. The OCA would prefer to see PWSA and the City negotiate a mutually acceptable agreement, subject to Commission review, rather than have the Commission impose terms on those parties. In particular, the OCA is concerned that the Commission use of its Section 508 powers in the manner suggested by PWSA would lead to lengthy litigation and judicial review, taking resources of PWSA, the Commission, and other parties, that could be better devoted to improving service and enhancing the efficiency of PWSA's operations.

The Authority addresses unmetered and/or unbilled usage, including City usage, on page 108-111 of the Compliance Plan. PWSA indicates that it "is aware of between 200-400 City-owned and/or operated locations where it either does not bill the City for water service or where it neither meters nor bills the City for water service." Compliance Plan at 108. In response to this issue, the Authority states that it is developing a Request for Proposal for engineering assistance to identify, evaluate and design metering facilities for unmetered properties, with the goal of having the consulting firm under contract by April 1, 2019 and receiving bids on a separate construction contract to construct and install meter facilities by December 31, 2019. Compliance Plan at 109-110.

The OCA has identified several related issues. PWSA lumps together "unmetered" and "unbilled" water accounts. The OCA has a number of concerns with this approach. There is a significant difference between unmetered accounts and unbilled accounts. It is not uncommon for older water utilities to have some accounts that have not been metered, particularly where there are physical plumbing issues that make metering either impractical or extremely expensive. For such accounts, PWSA should have an unmetered (flat) rate for service. It is typical for such unmetered rates to be based on a level of average (or sometimes above-average) consumption for customers of a similar size and type. Unmetered rates can be implemented immediately (after

appropriate customer notice, of course). The OCA submits, therefore that PWSA's compliance plan should include the immediate flat rate billing of any unbilled accounts.

The OCA also strongly opposes PWSA's suggestions on page 110 that PWSA should wait as long as five years to begin billing some unmetered accounts and that billing should be phased in over five years from that point. In other words, PWSA suggests that it should receive no revenues from some of its unmetered accounts for five years and then wait an additional five years to begin receiving cost-based revenues from those accounts. This is not acceptable. The billing of unmetered accounts should begin immediately using reasonable estimates of the building and site characteristics. Then, when meters are installed, PWSA should follow the Commission's typical protocol for moving customers from unmetered rates to metered rates (including a transition period of approximately 12 months when customers' bills show metered usage and what the metered bill would be, but the customer would be required to pay only the unmetered rate for service).

Moreover, the OCA submits that for accounts that are billed but unmetered, PWSA should develop a plan to install meters where it is cost-effective to do so. That effort should be prioritized to begin with the largest customers, such as the Pittsburgh Zoo and PPG Aquarium, and the largest City-owned office buildings, housing complexes, and schools.

The OCA has also identified a possible related operational issue. Because the Authority "has not metered the majority of City properties and does not keep an accurate accounting of metered water use at other City locations, it is impossible to determine if the City exceeds its yearly allocation of 600 million gallons. Based on estimates, however, it is suspected that the total used by the City is in excess of 600 million gallons." Compliance Plan at 108. The OCA recommends that this issue will need to be thoroughly examined in the Compliance Plan. At a

minimum, by the end of 2019, if not earlier, PWSA should identify all the City owned/operated properties and estimate the annual water usage for each by applicable published information and/or similar customers. PWSA should do the same for all unmetered customers.

PWSA proposes the addition of a surcharge to be included with the ALCOSAN portion of the charges billed to PWSA customers on behalf of ALCOSAN. Compliance Plan at 112. The OCA has two concerns with billing for wastewater treatment services from ALCOSAN. First, PWSA has not clearly stated whether City-owned properties are billed for wastewater service. From the information available to OCA, it appears that City-owned properties (the same properties that are not paying for water service) are not billed for wastewater service. If this is accurate, it means that all other customers are subsidizing the costs of providing wastewater service to properties such as the Pittsburgh Zoo and PPG Aquarium, and hundreds of City-owned buildings. As is the case with water service, this practice must end immediately and need not wait for the installation of water meters. All properties that are connected to PWSA's wastewater collection system should be billed for service.

Second, the OCA notes PWSA's concern with customers "not paying [the] cost of uncollected revenue or all billing costs" (p. 111). Before implementing a surcharge or other rate, however, it must first be assured that the "uncollected" revenue does not relate to accounts receiving free service. Under no circumstances should paying customers be assessed a surcharge to cover the cost of service to properties that PWSA refuses to bill for service. The OCA recommends that this issue be further examined in the Compliance Plan proceeding.

Regarding PWSA's plan to address Non-revenue water (NRW), pages 121-122 of the Compliance Plan, PWSA states that it is not able to make a meaningful assessment of its Non-revenue Water (NRW) because it "lacks accurate means of determining flows into and out of the

water distribution system.” PWSA states that it recently installed water meters on the filters at the Aspinwall water treatment plant but it does not meter water through its clearwell or water going into or out of its major pumping and storage facilities. According to the Authority, the filter meters provide an approximation of the volume of the water going into the water system. PWSA acknowledges that the combination of inadequate metering at the treatment, storage and pumping facilities and challenges with City locations and old meters, makes it impossible to develop an accurate measure of NRW.

The OCA recommends that, starting January 1, 2019, PWSA should begin estimating and recording water use for purposes including, but not limited to: firefighting, street sweeping, flushing, tank overflows, blow-offs, unavoidable pipe leakage, repaired main breaks, and evaporation (when using Highland 1 Reservoir). PWSA should also estimate the water delivered to the distribution system by filter meters or high lift pump stations (when available) and estimate City and other customer unmetered usage. Firefighting, flushing, repaired main breaks, tank overflows should be estimated and recorded shortly after their occurrences. This information should be used to calculate unaccounted for water by completing a PUC Section 500 form.

III. CONCLUSION

The OCA appreciates this opportunity to submit these preliminary comments. The OCA anticipates that it may raise additional issues and that some of the issues raised above may be resolved during the pending rate proceedings, but that the issues to be covered in the Compliance Plan will be developed during the course of the proceeding.

Respectfully Submitted,



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November 2, 2018
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CERTIFICATE OF SERVICE

Re: Implementation of Chapter 32 of the : Docket Nos. M-2018-2640802 (w)
Public Utility Code Re. Pittsburgh : M-2018-2640803 (ww)
Water and Sewer Authority :

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

Dated this 2nd day of November 2018.

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