

COMMONWEALTH OF PENNSYLVANIA



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January 7, 2013

Rosemary Chiavetta, Secretary
PA Public Utility Commission
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RE: Petition of PECO Energy Company for Approval of
Its Default Service Program
Docket No. P-2012-2283641

Dear Secretary Chiavetta:

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

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

Sincerely,

A handwritten signature in cursive script that reads "Christy M. Appleby".

Christy M. Appleby
Assistant Consumer Advocate
PA Attorney I.D. # 85824

Enclosures

cc: Hon. Dennis J. Buckley, ALJ
Certificate of Service

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BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Petition of PECO Energy Company :
For Approval of its Default : Docket No. P-2012-2283641
Service Program :

REPLY COMMENTS OF THE
OFFICE OF CONSUMER ADVOCATE

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I. INTRODUCTION

On October 12, 2012, the Pennsylvania Public Utility Commission (Commission) entered an Opinion and Order (October 12 Order) in the above-captioned proceeding involving the Default Service Plan II (DSP II) of PECO Energy Company (PECO or the Company). In the October 12 Order, the Commission directed PECO to submit new proposals for various aspects of its DSP II. October 12 Order at 155-157. In the October 12 Order, the Commission directed PECO to submit: (1) new proposals for the Company's Retail Market Enhancement (RME) Programs, specifically the Company's proposal regarding Electric Generation Supplier (EGS) selection, customer assignment and the role of the independent monitor for the Retail Opt-In Program (Opt-In Program) and application and form requirements for EGSs that participate in PECO's Opt-In Program and Customer Referral Program (Referral Program), and (2) a revised cost recovery mechanism for the Opt-In and Referral Programs. Id. PECO was directed to create these new proposals after discussion and consultation with the other parties and stakeholders and submit the proposals within sixty days of entry of the October 12 Order. Id.

PECO convened in-person stakeholder meetings on November 27, 2012 in Hershey, and December 3, 2012 in Philadelphia and a conference call on December 6, 2012. The interested parties reached consensus on many topics but were unable to reach consensus on all provisions of the EGS applications and form requirements or cost recovery. Thereafter, on December 11, 2012, PECO submitted its Revised Default Service Plan Compliance Filing (Revised Plan) to the Commission. In its Revised Plan, PECO proposed that other parties and stakeholders submit Comments to the Revised Plan by December 27, 2012, and Reply Comments by January 7, 2013. Revised Plan at 12-13. PECO has requested that the

Commission enter a Final Order on its Revised Plan by January 24, 2013, so that PECO will have sufficient time to implement the Company's Opt-In Program. Revised Plan at 5.

In accord with PECO's proposed schedule, the OCA and several of the other Parties to this proceeding submitted Comments on December 27, 2012. In these Reply Comments, the OCA will respond to the Comments submitted by the Retail Energy Supply Association (RESA), FirstEnergy Solutions (FES) and Dominion Retail, Inc. and Interstate Gas Supply, Inc. (Dominion/IGS). Specifically, the OCA will respond to the RESA, FES and Dominion/IGS Comments as to cost recovery for the Retail Market Enhancement Programs (RME) and RESA's Comments regarding the design of the Opt-In Program and the design of the Customer Referral Program. The OCA wishes to thank the Commission for the opportunity to submit these Reply Comments.

II. REPLY COMMENTS

A. Cost Recovery for the RME Programs

In their Comments, several EGS parties recommend that EGSs be relieved, in whole or in part, from bearing cost responsibility for the RME Programs. Cost recovery for the RME Programs has been an on-going source of concern for the OCA throughout this matter.

It has been a common argument from EGSs that they are being hampered in their current marketing activities, due, at least in part, to the high acquisition costs of procuring customers on a "one-off" basis and because of the existence of default service. Providing a mechanism, such as the RME Programs, where EGSs could potentially acquire large numbers of customers through streamlined processes could substantially lower these one-off acquisition costs and allow EGSs to create higher visibility for their products and the retail markets in general. Additionally, having the EDCs develop and offer these programs addresses the EGS

concern as to default service. Simply put, these Programs are designed to increase the market share of the EGS, on an expedited basis, without the large acquisition costs of attracting customers through individual EGS marketing efforts and with the sponsorship branding of the EDC. The Commission has already recognized this point several times in recent Orders. As to cost recovery for Opt-In and Customer Referral Programs, the Investigation of Pennsylvania's Retail Electricity Market: Intermediate Work Plan Order (IWP Order) provided that:

Concerning the OCA's and UGIES's request to have participating EGSs pay for the cost of implementing the Retail Opt-In Auctions, the Commission agrees. In the Commission's view, having the participating EGSs pay for the auction implementation is a prudent way to recover the auction costs, given that the participating EGSs are the entities reaping the possible customer acquisition benefits resulting from the auction.

As to program costs, we agree with the assertions of OCA and UGIES that the bulk of the costs, including the costs of maintaining the referral programs once they are put into place, should be the responsibility of the participating EGSs.

IWP Order, Docket No. I-2011-2237952 (Order entered March 2, 2012) at 32, 78. The Commission's October 12 Order provides:

That PECO Energy Company, in collaboration with interested electric generation suppliers, are directed to submit a proposal to the Commission on how electric generation suppliers will pay for the costs of the Retail Market Enhancement Programs as modified by this Opinion and Order. This proposal shall be submitted as part of the revised Default Service Plan to be filed pursuant to Ordering Paragraph No. 18, *infra*.

October 12 Order at 155.¹ Similarly, in the recent FirstEnergy default service proceeding, the Commission ordered that:

Upon review of the Recommended Decision and the record in this proceeding, we find that we do not have sufficient information to adopt the proposal for the cost recovery of the ROI Aggregation Program and Standard Offer Customer Referral

¹ RESA argues that the Commission has indicated that it would consider alternative cost allocation proposals. RESA Comments at 6-7. In the PECO DSP II Reconsideration Order that RESA cites, the Commission stated that the parties consider cost responsibility of EGSs and possibly customers in a collaborative process. PECO DSP II Reconsideration Order at 15-16 (Order entered November 21, 2012). This was not a determination of cost responsibility.

Program as recommended by the ALJ. At this time, we have significant concerns that the \$100,000 required up-front cost for EGS participation may be a significant barrier to entry. Likewise, the cost for the newly designed ROI Aggregation Program have not been discussed during the course of this proceeding. Accordingly, the Companies, with the cooperation of the EGSs, are directed to resubmit a plan or proposal within sixty days for Commission review regarding how EGSs will pay for the Standard Offer Customer Referral Program and the redesigned ROI Aggregation Program.

Joint Petition of Metropolitan Edison Company, Pennsylvania Electric Company, Pennsylvania Power Company, and West Penn Power Company for Approval of Their Default Service Programs (FirstEnergy August 16 Order), Docket Nos. P2-11-2273650, P-2011-2273668, P-2011-2273668, P-2011-2273670, (Order entered August 16, 2012) at 16.

The Revised Plan provides the following as to cost recovery for the Opt-In and Referral Programs, respectively:

RFP Costs. All estimated costs of this RFP incurred by PECO, including the service of the Statistical Expert, and all incremental costs of developing, pricing, and mailing the offer package (including return postage) will be used to develop a “Not-to-Exceed Cost per Allocated Customer or actual cost per allocated customer (whichever is smaller); and (2) the number of Eligible Customers allocated to that Opt-In Supplier. PECO shall invoice each Opt-In Supplier within thirty days of the Opt-In Supplier receipt of its allocated customer list, with the amount due payable within thirty days of the date of the invoice. If an Opt-In Supplier fails to make the required payment, PECO may reduce the amount due to that Opt-In Supplier from that Opt-In Supplier’s next Purchase of Receivable payment by the Opt-In amount due (but not from that amounts subject to a bona fide POR payment dispute).

Revised Plan, Exh. D at 12, ¶ 8.1. As to the Referral Program, the Revised Plan provides:

Program Costs. All costs associated with implementation of the Standard Offer Supplier Program, including this RFP, will be recovered through a discount in the Purchase of Receivables payment to all suppliers serving residential customers. Costs include information system implementation costs for website and IVR changes, incremental call center support for the program and other associated administrative costs.

Revised Plan, Exh. E at 6, ¶ 6.1. The OCA submits that the revised provisions properly assign cost responsibility for these programs to the EGSs as the EGSs are the direct beneficiaries of these programs.

In its Comments, RESA, Dominion/IGS, and FES object to the proposed cost recovery mechanism on several grounds.² RESA proposes that the costs for the RME programs be assigned 100% to customers or at least be shared equally between EGSs and distribution customers. To effectuate this sharing, RESA proposes that an EGS per customer acquisition cost of no more than \$30 be set for the Referral Program. RESA Comments at 9-10.³ The OCA submits that Dominion/IGS and FES proposals to significantly alter the cost recovery provisions and cost responsibility as set forth in the Revised Plan should not be adopted.

The RME Programs were designed to enhance the retail market share of EGSs, on an expedited basis and at a reduced cost level. The proposed Opt-In and Referral Programs are being implemented at the behest of the EGSs, and are primarily for their benefit. In both Programs, the initial discount off the PTC may or may not actually provide savings over the projected 12-month terms of the Programs. Customers might realize savings, or they might not,

² The OCA notes that Dominion/IGS also argues that customers should be required to share in the costs of the programs. Dominion/IGS Comments at 2-3. The OCA's arguments to RESA's Comments regarding cost recovery should also be applied to Dominion/IGS's Comments.

FES argues in its Comments that primary responsibility for the costs of the RME Programs should be placed on the EGSs. FES Comments at 6-7. FES recommends, however, that any under-collection for the costs of the programs should be collected from customers. FES Comments at 7. FES's proposal would allow EGSs to sign a waiver to avoid being allocated the costs of the Referral Program with any resulting under-collection being allocated to customers. FES Comments at 7. The OCA notes that if many or all EGSs in the service territory elect to sign the waiver, residential customers would end up bearing the majority of the costs.

³ The OCA notes that RESA incorrectly states the proposed costs for the Referral Program. RESA states that the costs of the Referral Program would be \$1.3 million and the annual cost of the program call center support would be \$900,000. RESA Comments at 3, citing to Exh. ABC-5. The OCA notes that this number was updated to \$2.1 million in PECO's St. 5, Exh. ABC-4R. It is the OCA's understanding that the most recent total cost estimate for the two years would be \$2.6 million for the start-up costs and another \$900,000 per year operational costs. See also, Dominion/IGS Comments at 3.

and some level of vigilance is going to be required on the part of customers to assure that they are continuing to get the best deal as the Programs advance.

As to EGSs, the RME Programs are designed to provide EGSs with the opportunity to acquire large numbers of customers with minimal, per-customer acquisition costs. The OCA agrees with RESA that Program costs should be minimized and efficiencies gained wherever possible in order to ensure EGS participation and Program success. The OCA submits, however, that, as the Commission has recognized, EGS participation in these Programs is voluntary. If RESA members conclude that their own per-customer acquisition costs, outside of the RME Programs, including the total costs of marketing, acquisition, and retention is less than what the RME Program offers – it is up those individual EGSs to choose whether to participate or not. Accordingly, the OCA is opposed to the idea of shifting these costs to customers, particularly if it is the position of the EGSs that the “acquisition” costs of the Programs exceeds the costs that EGSs would incur through their own individual marketing efforts.

In conclusion, the EGSs are the direct beneficiaries of these RME Programs. The Commission has recognized this point and concluded that EGSs should accordingly bear the costs of these programs. See, IWP Order at 32, 78; October 12 Order at 155; FirstEnergy August 16 Order at 136. The OCA submits that the cost recovery mechanism proposed in the Revised Plan properly assigns cost responsibility to EGSs.

B. Opt-In and Customer Referral Program Design Changes

On pages 10 to 11 of its Comments, RESA proposes Opt-In and Referral Program design changes “in exchange for allocating the costs of the program on a 50/50 basis between

EGSs and consumers.” RESA Comments at 11.⁴ RESA proposes that the Opt-In Program could be redesigned as a six-month program, with 5% guaranteed savings from the PTC in the effect during the term, and a \$50 bonus paid after the customer remains with the EGS for three months. Regarding the Referral Program, RESA proposes a guaranteed discount of 7% off the PTC for the first four months of the twelve-month program. RESA Comments at 10.

The OCA has argued throughout the proceeding that the RME Programs need to provide guaranteed savings and benefits to customers, need to ensure that customers will not be harmed by their participation in the program, and need to ensure that default service will not be negatively impacted by the programs. The OCA proposed numerous interrelated design recommendations for the Opt-In Program and Referral Program in order to effectuate these protections.

The OCA appreciates RESA’s interest in potentially addressing some of the OCA’s concerns by offering to provide some level of guaranteed savings for a specified period of time. The OCA, however, detailed other critical topic areas in its testimony and briefs including the following: (1) customer eligibility; (2) provision of key terms and conditions; (3) customer participation cap; and (4) customer options on product expiration and notice requirements that also had to be considered. OCA M.B. at 53-72. RESA’s proposal falls short of addressing all necessary consumer protections.

C. PECO’s EGS Applications and Form Agreements

1. Requirement for EGS Applications and Form Agreements

RESA opposes PECO’s proposal that each EGS participating in the RME Programs be required to sign PECO’s EGS Applications and Forms Agreements as a pre-

⁴ The OCA notes that Dominion/IGS have also proposed a First Choice Program. Dominion/IGS Comments at 5. The OCA submits that such a dramatically different RME Program that was not fully explored in the record of this proceeding should not be considered at this late stage of the proceeding.

condition to being able to participate in the RME Programs. RESA Comments at 17. The OCA respectfully disagrees with RESA regarding the need for EGSs to sign the Applications and Forms Agreements. The OCA submits that the EGS Applications and Forms Agreements establish the parameters for the EGS's participation and establish the rights and responsibilities of PECO and the EGSs in the joint operation of the RME Programs. The RME Programs differ from utility to utility, and they reflect the understanding of the parties regarding how the RME Programs will operate from the requirements for participation, to the timeline for participation, cost recovery of the RME Programs, and RME Program design elements. It clearly spells out the requirements for participation in the RME Programs so that all EGSs and PECO understand their rights and responsibilities under the program. The OCA submits that such clarity is important, particularly for those EGSs that may not be as familiar with the Commission's efforts to develop the RME Programs.

2. EGS Additional Reporting

In PECO's Revised Plan, EGSs participating in PECO's Opt-In Program must prepare and submit a confidential report to PECO containing the following information:

6.5.1 Number of customer accounts sent by offer packages (by Rate); Number of customer accounts that accepted the offer (by Rate); Form of acceptance (by Rate)(i.e. %); % Website; and % Phone, totaling 100%).

Revised Plan at Exh. D, ¶ 6.5. In its Comments, RESA opposes the requirement that EGSs provide monthly reports with this information because it is unnecessary and burdensome. RESA Comments at 17. The OCA supports PECO's proposal to require this confidential reporting information.

PECO's Revised Plan charges participating EGSs with administering the 50% customer participation cap (see Revised Plan at Exh. D, ¶ 6.3.5), so EGSs must track this

information in the confidential reports in order to comply with this requirement. The reporting requirement, therefore, is not unnecessary and it should not impose any undue costs or time burdens on participating EGSs beyond what is already required by PECO's Revised Plan in compliance with the IWP Order. IWP Order at 59-60. Further, the OCA submits that these reports will be crucial to determining the success of the Opt-In Program and are the only means to measure that success.

As discussed in the OCA's Comments, the OCA also recommends that additional information would be valuable in determining the success of PECO's Opt-In Program and should be included in the reporting requirement as well. OCA Comments at 3-4. The OCA proposed that EGSs be required to track the number of Opt-In Program customers that remain in the Program each month for the duration of the Program. Such information could help to determine the elements of the Opt-In Program that were most attractive to customers. Knowing this information could assist the Commission, EDCs and advocates in its education efforts and could assist EGSs in developing future products for customers. The OCA recommends that this same information be collected for the Referral Program.

3. Right to Cancel Contracts

In its Comments, RESA recommends that Section 7.15 of the Opt-In Program rules and Section 5.6 of the Referral Program be deleted. These sections prohibit a participating supplier from discontinuing service to its customers due to a "change in applicable rules, regulations, tariffs, or orders." Revised Plan, Exh. D at 10, Exh. E at 6. While the OCA takes no position on the challenged language, the OCA wants to make clear that it is the OCA's position that EGS should not be permitted to drop an individual customer or be permitted to selectively drop certain customers during the program.

4. Bonus Payment Reporting

In PECO's Revised Plan, PECO provides that:

7.7 The Opt-In Supplier shall track the following information related to the payment of bonus checks and shall provide this information to PA PUC Staff and/or the [OCA] and/or the [OSBA], on a confidential basis, upon request: Customer Name; Address; Account Number; Date that the customer qualified to receive the bonus check; Date the bonus check was mailed; and an indicator of whether the bonus check was cashed.

7.8 Within ten business days of satisfying all of its bonus payment obligations under the Program, the Opt-In Supplier shall provide written notice (by email) of such satisfaction to the PA PUC Staff, the OCA (for residential customers) and the OSBA (for small commercial customers).

Revised Plan at Exh. D, ¶¶ 7.7-7.8. In its Comments, RESA states that these record retention requirements and reporting requirements are unnecessary and burdensome. RESA Comments at 21. The OCA submits that these components should be retained on an individual customer basis because they provide important information for the review of the success of the Opt-In Program and a verifiable link to the provision of the \$50 bonus to participating customers.

The OCA submits that this information needs to be maintained for the EGSs' business records. In the event of a dispute or complaint by a customer regarding the receipt of the rebate, the EGS must be able to verify that it paid the specific customer the \$50 bonus payment, or that the customer did not qualify for the \$50 bonus payment. The EGS must retain this level of detail in order to create an auditable trail to resolve any potential disputes or questions about the \$50 bonus payment.

The OCA notes that FES has requested that for reporting purposes this information should be aggregated for all customers mailed the bonus check. FES Comments at 11. The OCA does not oppose this request for reporting purposes so long as the information is

retained on an individual customer basis by the EGS and can be made available to the Commission or the OCA in event of a complaint or dispute.

III. CONCLUSION

The Office of Consumer Advocate appreciates the opportunity to submit these Reply Comments. The OCA respectfully requests the Commission consider the discussion herein, as it reaches a final determination as to the provision of retail market enhancement programs within the PECO service territory.

Respectfully Submitted,



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DATE: January 7, 2013
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CERTIFICATE OF SERVICE

Re: Petition of PECO Energy Company for
Approval of Its Default Service Program
Docket No. P-2012-2283641

I hereby certify that I have this day served a true copy of the foregoing document, the Reply Comments of the Office of Consumer Advocate, 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 7th day of January 2013.

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