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November 15, 2013

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

**RE: PECO Energy Company Universal Service and
Energy Conservation Plan for 2013-2015
PUC Docket No. M-2012-2290911**

Dear Ms. Chiavetta:

Enclosed for filing with the Commission is PECO Energy Company's Response to the Office of Consumer Advocate's May 17, 2013 Comments, regarding the above referenced Case. I have enclosed a Certificate of Service showing that a copy of the above document was served on the interested parties. Thank you for your time and attention on this matter.

Very truly yours,

A handwritten signature in blue ink, appearing to read "Ward L. Smith", is written above the typed name.

Ward L. Smith
Assistant General Counsel
For PECO Energy Company

WLS/adz

cc: Administrative Law Judge, Cynthia Fordham

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**PECO Energy Company Universal Service and
Energy Conservation Plan for 2013-2015** :
: **M-2012-2290911**

**PECO Energy Company's Response to
The Office of Consumer Advocate's May 17, 2013 Comments**

On May 17, 2013, the Office of Consumer Advocate (the "OCA") filed Comments in this docket related to PECO's May 6, 2013 filing of its Second Amended Three-Year Plan.¹ PECO hereby responds to the OCA's Comments.

The OCA's May 17, 2013 Comments discuss PECO's May 6, 2013 compliance filing in this docket. In those Comments, the OCA discussed five issues:

- (1) Enrollment of CAP B Customers in CAP A
- (2) Arrearage Forgiveness
- (3) Social Security Numbers
- (4) Zero Dollar Income
- (5) Low-Income Usage Reduction Program ("LIURP")

PECO provides the following information on each of the issues raised by the OCA.

¹ PECO cannot locate any record of having received the OCA's Comments. Counsel for OCA has provided PECO with the original email transmitting the comments, and PECO's counsel is listed, at the correct email address. Notwithstanding that, the OCA Comments were not filed as part of an ALJ- or Commission-ordered filing sequence, and PECO was not aware of the existence of the OCA Comments until it saw reference to them in comments filed by TURN et al. on October 21, 2013.

1. Enrollment of CAP B Customers in CAP A

In 2008, PECO undertook an effort in which it contacted CAP B customers who were in the termination process to inform them about PECO's CAP Tier A and to inquire whether the customers had "extenuating circumstances" that would warrant moving the customer to CAP A. As discussed in PECO's testimony (PECO Statement No. 1, Testimony of Lauren B. Feldhake, pp. 39-40) this effort primarily involved calling CAP B customers. There was a very low contact or response rate because approximately 70% of the contact phone numbers from CAP B customers were no longer being used by the customer at the time of the outreach. PECO attempted to reach 623 customers through this effort; 185 were contacted. Of those, 147 requested a CAP A application.

In its Order (p. 28), the Commission states that it "deems such an effort commendable," and directs PECO to take similar steps as an ongoing process. Similarly, on page 52, concluding paragraph 2, the Commission directs PECO to "make a concerted outreach effort as it did in 2008, to target enrollment in CAP A [as] an ongoing practice." The Commission also directs PECO to train or retrain consumer services and outreach staff concerning the eligibility requirements and benefits of CAP Rate A.

PECO's Second Amended Plan states (p.16) that: "As directed by the Commission's April 4, 2013 Order (p. 52, concluding paragraph 2), PECO will implement an on-going process to reach out to CAP B customers to notify them of their potential eligibility of CAP Rate A." PECO's submittal letter also states that its CAP A training was underway at that time.

The OCA's Comments (pp. 1-2) raise two concerns. First, the OCA is concerned that PECO's Second Amended Three-Year Plan "does not specifically state that the Company plans to undertake the same level of efforts that it took in 2008 to enroll customers in CAP Rate A on an on-going basis."

(emphasis in the original OCA comments). Second, the OCA wants PECO to amend its Second Amended Three-Year Plan to describe its training on this issue.

As to the OCA's first issue, in its Second Amended Three-Year Plan PECO clearly has made a commitment to do its CAP B outreach on an ongoing basis – the language of the Second Amended Three-Year Plan specifically says that PECO will “implement *an on-going process*.” PECO is thus unclear why the OCA felt it necessary to emphasize the “on-going basis” phrase in its comments. Nonetheless, PECO may be able to resolve the OCA's concerns. In the next termination season PECO will follow the 2008 process that the Commission ordered – that is, for CAP B customers who are in the termination pool, PECO will attempt to contact them regarding CAP A eligibility. The attempted contact is likely to be by phone, as it was in 2008. However, given the low contact rate from the 2008 phone calls, during the next and future termination seasons PECO will also look for opportunities to communicate with this group through other methods.²

PECO does not know which specific future opportunities may present themselves, and therefore cannot at this time describe how it will respond to those opportunities, but it has committed in its

² For example, at PECO's November 12, 2013 Universal Services Advisory Committee (“USAC”) meeting, PECO and the attending stakeholders brainstormed on potential additional methods of pursuing this outreach. PECO views two of the brainstorming ideas favorably – (1) targeting CAP B customers in the Winter Survey for this outreach, and (2) having the area Community Action Agencies identify clients in the 0-25% income range and contact PECO regarding them – and is currently evaluating how to implement those alternatives.

This stakeholder process is one of the reasons that PECO believes it should be allowed to continue with its general commitment to a CAP B/CAP A process, rather than trying to define every aspect of that process in a further amendment to its Three-Year Plan. PECO meets with the USAC four times a year, and has numerous interactions with stakeholders between meetings – and efforts such as the brainstorming described above are common in those interactions. Moreover, PECO regularly seeks to improve its Universal Services programs outside of the USAC process. (For example, the 2008 CAP B/CAP A effort that the Commission deemed to be commendable was not described in PECO's Three-Year Plan for that period, but rather was a PECO-devised and initiated improvement.) If all the program details are locked down in the Three-Year Plan, then such innovation will be stifled until the next Three-Year Plan filing.

Second Amended Three Year Plan to “implement an on-going process to reach out to CAP B customers to notify them of their potential eligibility of CAP Rate A.” PECO respectfully submits that this commitment is sufficient to comply with the Commission’s Order because it commits PECO to action for the customer population that is of concern to the stakeholders and the Commission (CAP B customers in the termination pool) -- but that PECO should be allowed the flexibility to develop the precise form of the communications over time, as opportunities and ideas present themselves. PECO therefore respectfully submits that no additional amendment to its Three-Year Plan is required.

As to the OCA’s second concern, regarding training, PECO notes that earlier this year it reiterated to its CARES workers and other key customer care personnel that they should address CAP A eligibility with all CAP B customers with whom they were interacting, with a goal of increasing enrollment in CAP A when the customer meets the eligibility requirements of CAP A. PECO is also reviewing its CAP Call Center Representative (“CSR”) training materials for additional rollout at the beginning of the 2014 termination season. Moreover, if training or retraining is necessary for the additional outreach described above, it will be crafted and implemented as part of that effort.

PECO does not, however, agree that details of training should be addressed in its Second Amended Three-Year Plan. Not every issue related to PECO’s Universal Services Programs should be included in its Three-Year Plan. The appropriate contents of Three-Year Plans are set forth in the Commission’s regulations at 52 Pa. Code § 54.74, and those regulations do not request or require a utility to discuss its personnel training or retraining plans in the Three-Year Plan. Therefore, while PECO recognizes its obligation to fulfill the Commission’s order to train or retrain on this issue, and has stated that commitment both in its prior submittal letter and in these reply comments, it does not agree that its Three-Year Plan should be amended to include a discussion of that training.

2. Arrearage Forgiveness

PECO's Three-Year Plan, as originally filed with the Commission, contains a CAP pre-program arrearage ("PPA") forgiveness component. When a customer enters the CAP program for the first time, their pre-program arrearage, if any, is set aside. Each time that a customer pays their monthly bill in full and on time, one-twelfth of their PPA is forgiven.

The OCA's witness Roger Colton recommended that if a customer falls behind on their CAP payments during the first year but, at month 12 in the CAP program, the customer has caught up on payments and has a zero balance, then PECO should deem that customer to have made 12 payments in full and on time, and provide that customer with full forgiveness of their PPA.

The Commission (p. 52, concluding paragraph 3) accepted this recommendation and ordered PECO to alter its arrearage forgiveness program so that it would "grant forgiveness when missed payments are caught up."

PECO's Second Revised Plan (p. 15) states: "As directed by the Commission's April 4, 2013 Order (p. 52, concluding paragraph 3), PECO will continue to apply 1/12th PPA forgiveness for payments received throughout the year on a month-to-month basis. PECO will also enable an enhanced forgiveness process for customers who are caught up on payments at the 12 month mark or beyond."

The OCA's Comments (p. 3) request that PECO: "clarify that the 'enhanced forgiveness process' will allow arrearage forgiveness to those customers who have missed payments during the course of the year, but have subsequently made up those payments."

PECO so clarifies. PECO is making changes to its IT system to implement the Commission-directed outcome: If a customer is caught up (zero CAP program balance) in month 12 (or month 13, or

month 14, etc.) then the customer will be deemed to have made 12 in-full on-time payments, and the entire arrearage will be forgiven once the zero CAP balance is achieved. PECO believes that commitment is already explicit in its Second Amended Plan, which states that it will provide forgiveness “for customers who are caught up on payments at the 12 month mark or beyond,” and therefore does not believe that its Second Amended Plan needs additional amendment.

3. Social Security Numbers

PECO’s Three-Year Plan, as originally filed with the Commission, had a provision to require Social Security Numbers (“SSNs”) for all adult household members. Numerous parties objected to this plan element.

The Commission (p. 52, concluding paragraph 5) ordered that PECO could request, but not require, an SSN; that the right to refuse must be stated on PECO’s CAP application; and that PECO should contact the Pennsylvania Coalition Against Domestic Violence (“PCADV”) within 30 days to develop a process to ensure the privacy of victims of domestic violence.

PECO’s Second Amended Plan (p. 13) states:

As directed by the Commission’s April 4, 2013 Order (p. 52, concluding paragraph 5), PECO will request but will not require a social security or ITIN number for the customer of record or any household member for purposes of enrollment into CAP.

In addition, PECO’s submittal letter for its Second Amended plan noted that its coordination with PCADV was underway at the time the Second Amended Three-Year Plan was filed.

The OCA’s Comments (pp. 4-5) express concern that this language does not explicitly state that the right of refusal will be on the CAP application, and does not describe PECO’s coordination with PCADV.

At the outset, PECO notes that the Commission's Order gave PECO thirty days to file its Second Amended Plan and also gave it 30 days to contact PCADV. It therefore is not surprising that the Second Amended Plan does not contain detail on PECO's subsequent communications with PCADV. As PECO noted when it filed its Second Amended Plan, those communications were then underway, but not yet complete.

The answer to the OCA's concern is that, within 30 days of the Commission's Order, PECO contacted PCADV. The parties identified a common convenient date to meet and, on May 7, 2013, PECO and PCADV met and discussed PCADV's concerns. Based on those discussions and subsequent email exchanges between the parties, PECO CAP application requests but does not require an SSN or ITIN for each household member. PECO's CAP Application contains the following language on the face of the CAP application: *"Social Security number or ITIN is optional."* This language was reviewed and approved by PCADV.

PECO thus respectfully submits that it has complied with the Commission's Order. PECO further submits that the statement in its Second Amended Three-Year Plan that it "will request but will not require a social security or ITIN number" fully states its compliance with the Commission's Order, and that no further amendment of its Three-Year Plan is needed.

4. Zero Dollar Income

PECO's Three-Year Plan, as originally filed with the Commission, had a provision to require a notarized letter from customers who claimed to have zero income. Numerous parties objected to this plan element.

The Commission (p. 52. concluding paragraph 6) ordered that: "PECO will accept, from a household claiming no income, a detailed explanation of how the customer pays for basic living costs

rather than having the statement notarized. PECO is directed to analyze these situations as they come in, and use good judgment in requiring quarterly recertifications. PECO is directed to contact PCADV with the next 30 days, to construct agreeable document language.” In its discussion of this issue (pp. 39-40), the Commission noted with approval the recommendation of numerous parties, including the OCA, that PECO should pattern its “no income” verification on the DPW program. The Commission (p. 39) describes the DPW program as follows: “DPW requires a person claiming to have no income to submit a letter explaining how the person pays for basic living needs; however, this letter does not need to be notarized.”

PECO’s Second Amended Three-Year Plan (p. 13) states: “As directed by the Commission’s April 4, 2013 Order (p. 53, concluding paragraph 6), if a customer or any household member 18 years of age or older claims no income, the customer or household member must provide a statement demonstrating how they pay their monthly expenses.”

In addition, PECO’s submittal letter for its Second Amended plan noted that its coordination with PCADV was underway at the time the Second Amended Three-Year Plan was filed.

The OCA’s Comments (pp.5-6) express concern that PECO’s Second Amended Three-Year Plan is broader than the Commission’s Order because it allows PECO to require a statement from a household or an individual within that household, while the OCA believes that Commission’s Order only allowed PECO to request a statement from the household as a whole. The OCA also expresses concern that PECO’s Second Amended Three-Year Plan does not describe PECO’s coordination with PCADV.

At the outset, PECO notes that the Commission’s Order gave PECO thirty days to file its Second Amended Plan and also gave it 30 days to contact PCADV. It therefore is not surprising that the Second Amended Plan does not contain detail on PECO’s subsequent communications with PCADV. As PECO

noted when it filed its Second Amended Plan, those communications were then underway, but not yet complete.

The answer to the OCA's concern is that, within 30 days of the Commission's Order, PECO contacted PCADV. The parties identified a common convenient date to meet and, on May 7, 2013, PECO and PCADV met and discussed PCADV's concerns. Based on those discussions, the testimony of the witnesses, and the Commission's Order, PECO based its "no income" approach on the DPW approach. This approach was reviewed with and approved by PCADV at the May 7, 2013 meeting.

PECO parenthetically notes that it does not agree with the OCA regarding the limits of the Commission's Order. The language quoted above from page 39 of the Commission's Order speaks to DPW requiring a no-income explanation from a "person," not a household. PECO therefore respectfully suggests that the Order provided PECO the latitude to seek no-income statements from individuals as well as households.

With that said, PECO's is currently implementing a program, based on the DPW program, that PECO believes meets the OCA's concerns. In this process, PECO seeks income information about each adult member of a household that is applying for CAP. If the CAP applicant claims that an adult member of the household has no income then PECO may inquire further into that no-income person's financial state, giving specific reference to various potential forms of income such as welfare, social security benefits, alimony, unemployment compensation, etc., all in an effort to be certain that the applicant in fact has fully reported the income of the claimed no-income adult occupant. If at the end of that exchange the applicant continues to state that an adult member of the household has no income, then PECO will ask the no-income adult member to affirm their no-income status. But as long as the household has income the no-income member will not be required to provide a document explaining

how they pay for their basic living needs. However, if the household as a whole claims that it has no income, then PECO will require a no-income statement that is based upon the DPW form.

PECO thus respectfully submits that it has complied with the Commission's Order and with the OCA's concerns. PECO further submits that, for the reasons stated above, no further amendment of its Three-Year Plan is needed to demonstrate that compliance.

5. Low-Income Usage Reduction Program ("LIURP")

In the final section of its Comments (pp. 6-7), the OCA focuses on the Commission's discussion (Order, pp. 42-45) regarding PECO's Low-Income Usage Reduction Program ("LIURP"). The OCA particularly focuses on the following language (Order at 45):

The Commission finds that some retraining of staff may be necessary to ensure that referrals are made and LIURP eligible customers are correctly identified. The Commission does not find that an increase in LIURP budgeting is required to accomplish this objective. The Commission agrees with PECO that there are some situations where a customer, who meets all guidelines for LIURP, does not accept treatment or is otherwise determined to be ineligible for LIURP. Accordingly, PECO is directed to review the current practices to determine if additional targeting or assessment of customers, especially those at or below 25 percent of FPIG [Federal Poverty Income Guidelines] is necessary to provide proper referrals in the future.

The OCA expresses concern that this issue was not discussed in PECO's Second Amended Three-Year Plan.

PECO notes that the Commission's LIURP discussion was primarily, almost exclusively, focused on finding ways to increase LIURP benefits to a specific population – "those at or below 25 percent of FPIG." This population is served by PECO through its CAP levels A and B. PECO has reviewed its CAP A and B populations and believes that effectively 100% of that population has been targeted for, and contacted about, LIURP benefits. PECO therefore does not believe that additional targeting or assessment of that group could result in additional LIURP referrals. Consequently, no training is necessary on this issue.

The primary difficulty with providing LIURP benefits to CAP A and B customers is that, by definition, they have very low income – for 2013, the maximum a family of four can make in this CAP tier is approximately \$6,000 in annual income, and in 2012, PECO’s CAP B population had a reported average income of \$2778³ -- which results in these customers primarily residing in transient rental housing. Thus, a significant portion of the CAP A and B participants are targeted for and contacted about LIURP benefits but do not receive them. Their landlords refuse access; a significant number move to new housing before being contacted; and 70% of this population does not have a valid phone number with PECO for follow-up calls. This has resulted in PECO targeting 100% of the CAP A and B population for LIURP benefits, but only a relatively small percentage of that population actually receiving the benefits. The problem cannot be solved by additional targeting or assessment, because the targeting is already effectively at 100%.

PECO would also like to briefly comment on the Commission’s statement (Order p. 45), made during this same discussion, that: “The Commission has very clear guidelines for prioritizing LIURP participation at 52 Pa. Code §58.10(a)-(c), and it does not appear that the company has been following those as closely as prescribed.”

The noted regulations⁴ establish the following prioritization:

³ PECO Statement No. 1, Testimony of Lauren Feldhake, p. 32.

⁴ 52 Pa. Code §58.10 states:

(a) Priority for receipt of program services shall be determined as follows:

(1) Among eligible customers, those with the largest usage and greatest opportunities for bill reductions relative to the cost of providing program services shall receive services first. When prioritizing eligible customers by usage level, several factors shall be considered when feasible. These factors include: the size of the dwelling, the number of occupants and the end uses of the utility service. When prioritizing eligible customers by opportunities for bill reductions, utility rate factors which may

First, those with the “*largest usage* and greatest opportunities for bill reduction.” 52 Pa. Code §58.10(a)(1).

Second, among those with equal standing in step one, those with *the highest arrearages*. 52 Pa. Code §58.10(a)(2).

Third, among those with equal standing at step two, those with the *lowest income*. 52 Pa. Code §58.10(a)(3).

Thus, in the Commission’s regulations, *utilities are required to give income third priority* in targeting LIURP benefits.

PECO uses the following prioritization:

First, CAP customers.

Second, the lowest income customers by CAP tier.

tend to limit (for example, declining block rates) or facilitate, for example, time-of-day rates or heating rates, bill reductions somewhat independently of absolute usage levels should be considered.

(2) Among customers with the same standing with respect to paragraph (1), those with the greatest arrearages shall receive services first. When feasible, priority should be given to customers with the largest arrearage relative to their income; for example, arrearage as a percentage of income.

(3) Among the customers with the same standing with respect to paragraph (2), those with incomes which place them farthest below the maximum eligibility level shall receive services first.

(b) Covered electric utilities shall use the guidelines outlined in this section to determine the amount of annual program funding to be budgeted for usage reduction services available to residential space heating customers, residential water heating customers and residential high-use electric baseload customers.

(c) A covered utility may spend up to 20% of its annual program budget on eligible special needs customers as defined in § 58.2 (relating to definitions).

Third, within any given CAP tier, it focuses on the highest users.

Fourth, it focuses on non-CAP customers, using the same sequence as set forth above.

In other words, when PECO targets LIURP benefits, it currently gives *higher priority* to income level than the priority set forth in the Commission's regulations. If PECO were to strictly follow the prioritization set forth in the Commission's regulations, it would have to *lower* the priority given to income level, which would exacerbate the problem rather than solve it.

Because the reference to these regulations arose in the context of a discussion of how PECO can give higher priority to lower income customers, PECO does not believe that the Commission or any party would wish it to change its current program priority to precisely comply with the Commission's regulations and thus *lower* the priority given to income in targeting LIURP benefits. To the contrary, PECO believes that it *should continue its current practice of targeting LIURP by giving income a higher priority* than set forth in the Commission's regulations.⁵

Given the above discussion, PECO respectfully submits that no amendment to its Second Amended Three-Year Plan is needed to address these LIURP issues.

⁵ To the extent that a waiver of Commission regulations is necessary to achieve this outcome, PECO requests such a waiver.

CONCLUSION

For the reasons set forth above, PECO respectfully submits that no additional amendments to its Three-Year Plan are required.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Ward Smith", is written over a horizontal line.

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November 15, 2013

**P-2012-2283641 – PETITION OF PECO ENERGY COMPANY FOR APPROVAL OF ITS
DEFAULT SERVICE PROGRAM & M-2012-2290911. Created 1/7/2013 (Revised)**

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