

COMMONWEALTH OF PENNSYLVANIA



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August 27, 2015

Rosemary Chiavetta, Secretary
PA Public Utility Commission
Commonwealth Keystone Bldg.
400 North Street
Harrisburg, PA 17120

Re: Pa. Public Utility Commission
v.
Columbia Gas of Pennsylvania, Inc.
Docket No. R-2015-2468056

Dear Secretary Chiavetta:

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

Copies have been served per the attached Certificate of Service.

Respectfully submitted,

A handwritten signature in black ink that reads "Amy E. Hirkis".

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Attachment

cc: Honorable Mary D. Long, ALJ
Certificate of Service

211644

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Pennsylvania Public Utility Commission

v.

Columbia Gas of Pennsylvania, Inc.

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Docket No. R-2015-2468056

MAIN BRIEF
OF THE OFFICE OF CONSUMER ADVOCATE

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I. INTRODUCTION

A. Statement of the Case/ Procedural History

On March 19, 2015, Columbia Gas of Pennsylvania, Inc. (Columbia or the Company) filed Supplement No. 226 to Tariff Gas - Pa. P.U.C. No. 9, to become effective May 18, 2015. In its filing, Columbia sought Commission approval of rates and rate changes that would increase base rate revenues by \$46.2 million. Columbia provides natural gas service to approximately 417,000 residential, commercial, and industrial customers in portions of 26 counties in western, northwestern, central, and southern Pennsylvania.

On March 25, 2014, the Office of Consumer Advocate (OCA) filed a Formal Complaint and Public Statement. On March 27, 2015, Shipley Energy, Interstate Gas Supply, and Dominion Retail filed a Petition to Intervene (NGS Parties). On April 7, 2015, the Bureau of Investigation & Enforcement (I&E) filed a Notice of Appearance. On April 8, 2015, the Coalition for Affordable Utility Services and Energy-Efficiency in Pennsylvania (CAUSE-PA) filed a Petition to Intervene. On April 10, 2015, The Pennsylvania State University (PSU) filed a Formal Complaint. Also on April 10, 2015, the Office of Small Business Advocate (OSBA) filed a Formal Complaint and Public Statement. On April 14, 2015, the Columbia Industrial Intervenors (CII) filed a Formal Complaint.

The proceeding was assigned to Administrative Law Judge Mary D. Long. By Order entered April 9, 2015, the Commission suspended the implementation of Supplement No. 226 until December 18, 2015, and instituted an investigation into the lawfulness, justness, and reasonableness of the rates, rules, and regulations proposed in Supplement No. 226. A prehearing conference was held on April 16, 2015, and a procedural schedule was adopted.

The OCA conducted extensive discovery, and pursuant to the procedural schedule, submitted the testimony of the following witnesses in this proceeding:

Lafayette K. Morgan

OCA Statement No. 1-Revised – Revised Direct Testimony
OCA Statement No. 1-S – Surrebuttal Testimony

Aaron L. Rothschild

OCA Statement No. 2 – Direct Testimony
OCA Statement No. 2-S – Surrebuttal Testimony

Jerome D. Mierzwa

OCA Statement No. 3 – Direct Testimony
OCA Statement No. 3-R – Rebuttal Testimony
OCA Statement No. 3-S – Surrebuttal Testimony

Roger D. Colton

OCA Statement No. 4 – Direct Testimony
OCA Statement No. 4-R – Rebuttal Testimony
OCA Statement No. 4-S – Surrebuttal Testimony

The parties engaged extensive discussions aimed at resolving the issues concerning Columbia's filing. These discussions resulted in a partial Settlement.¹ The parties to this proceeding agreed to stipulate to the admission of the OCA's testimony into the record, and the testimony was admitted at the evidentiary hearing on August 4, 2015.

Prior to the filing the instant rate case, on June 2, 2014, Columbia submitted its proposed Universal Service and Energy Conservation Plan (USECP) for 2015-2017, at Docket Number M-2014-2424462.² Columbia Gas of Pennsylvania Inc. Universal Service and Energy Conservation Plan for 2015-2018 Submitted in compliance with 52 Pa. Code § 62.4, Docket No. M-2014-2424462 (Final Order entered July 8, 2015). (USECP Order) at 1. On March 26, 2015, the Commission entered a Tentative Order in the USECP proceeding, inviting interested parties to submit Comments on whether funds for the Company's Hardship Fund should be recovered through the Company's Universal Service Program Rider (Rider USP). USECP Order at 39.

¹ The parties will file the Joint Petition for Partial Settlement and their respective Statements in Supports on August 27, 2015, seeking Commission approval of the terms contained in the Settlement.

² On June 27, 2014, the Commission issued a Secretarial Letter that modified the USECP filing schedules for all energy utilities. Under the modified USECP filing schedule, Columbia's proposed USECP would extend to 2018. On January 16, 2015, Columbia submitted a revised USECP that covered 2015 through 2018.

The Company, the OCA and CAUSE-PA filed comments and/or reply comments to the Company's proposed USECP. Id. at 1. On July 8, 2015, the Commission entered the USECP Order in Columbia's USECP proceeding. In the USECP Order, the Commission directed the parties in the instant base rate proceeding to address the issue of whether funds for the Hardship Fund should continue to be recovered through the Rider USP. Id. at 40.

In compliance with the USECP Order, the OCA, I&E and CAUSE-PA submitted surrebuttal testimony on July 28, 2015, raising for the first time in this proceeding the issue of whether Columbia should recover Hardship Fund dollars through its Rider USP. Columbia then submitted rejoinder testimony of July 31, 2015, responding to the surrebuttal testimonies addressing this issue. The issue of Columbia collecting Hardship Fund dollars through its Rider USP is the only outstanding issue in the base rate proceeding.

The OCA submits this Main Brief pursuant to the ALJ's Order entered on April 21, 2015. The OCA addresses one issue in this Main Brief – whether Columbia should end immediately its practice of recovering hardship funds through its Universal Service Program Rider (Rider USP).

B. Legal Standards and Burden of Proof

Typically, in a base rate proceeding, the utility has the burden of proof with regard to the rates and modifications included in its filing. See 66 Pa. C.S. § 315(a). Specifically, Section 315(a) provides:

Reasonableness of rates – In any proceeding upon the motion of the Commission, involving any proposed or existing rate of any public utility, or in any proceedings upon the complaint involving any proposed increase in rates, the burden of proof to show that the rate involved is just and reasonable shall be upon the public utility.

66 Pa. C.S. § 315(a). Section 315(a) of the Public Utility Code does not place the burden of proof on the utility with respect to issues the utility did not include in its rate case filing. The Pennsylvania Commonwealth Court has held:

While it is axiomatic that a utility has the burden of proving the justness and reasonableness of its proposed rates, it cannot be called upon to account for every action absent prior notice that such action is to be challenged.

Allegheny Center Assocs. v. Pa. P.U.C., 570 A.2d 149, 153 (Pa. Cmwlth. 1990). Where a party that offers a proposal not included in the original filing, that party bears the burden of proof for such proposal. See, e.g., Pa. P.U.C. v. Metropolitan Edison Co., Docket No. R-00061366 (Opinion and Order entered Jan. 11, 2007); see also Joint Default Service Plan Citizens /Wellsboro, Docket No. P-2009-2110780 et al. (Final Order entered Feb. 26, 2010).

In Columbia's filing, the Company proposed a Rider USP rate that includes recovery of \$375,000 for the Hardship Fund. The issue of whether such recovery should continue was placed into this case by the Commission's Order in the USECP case. In that proceeding, Columbia had the burden of proving the reasonableness of its proposal to recover monies through the USP rider to fund for the Hardship Fund. USECP Order at 2-3; 52 Pa. Code §§ 62.1-62.8. For both reasons, Columbia bears the burden of proof – and was given the opportunity to provide the last word – in this proceeding with regard to continuing rate recovery. See CPA St. 112-RJ at 1-5.

II. SUMMARY OF ARGUMENT

Columbia's Hardship Fund is a program that assists residential customers facing temporary financial difficulty with paying their utility bill. Typically, hardship funds receive funding through voluntary donations and shareholder contributions. Since 2012, Columbia has recovered \$375,000 per year through the Rider USP for its Hardship Fund by virtue of a settlement in 2012. That settlement sought to address the loss of a substantial Hardship Fund contribution resulting from the cancellation of a supply contract. In the Commission's USECP Order in Columbia's USECP proceeding, the Commission raised the issue of whether Columbia's practice of collecting funds for the Hardship Fund through the Rider USP should

continue and, ultimately, directed that the issue be addressed in Columbia's pending base rate proceeding. Accordingly, the OCA provided testimony in this case explaining why collecting hardship funds through a universal service rider is not proper. The OCA, however, recommended that Columbia be permitted to continue recovering hardship funds through its Rider USP until its next base rate case so that Columbia has time to replace the Hardship Fund dollars that will be lost once they are removed from rates. The OCA submits that its recommendation should be adopted because it balances the interests of the customers who pay the Rider USP with those customers who utilize the Hardship Fund. The OCA also submits that its recommendation is consistent with the Commission's USECP Order in that it addresses the issue of whether Columbia should continue to recover hardship funds through its Rider USP, while providing time for Columbia to ramp up fundraising efforts or develop plans to replace the hardship funds.

III. ARGUMENT

A. History of Recovery of Amounts from Customers through Rates to Contribute to Hardship Funding.

Columbia's Hardship Fund is a program that provides financial assistance to residential customers who need help temporarily paying their bills. See OCA St. 4-S at 10. Typically, Hardship Funds are funded by voluntary donations from ratepayers, and are matched by a public utility's shareholders. Id. at 9. Prior to 2012, Columbia's Hardship Fund was receiving \$375,000 per year from Citizens Energy Corporation (Citizens), as part of the gas supply contract between Columbia and Citizens. USECP Order at 37. In 2012, Columbia cancelled its contract with Citizens and the contribution ended. As part of Columbia's settlement in its 2012 base rate proceeding at Docket Number R-2012-2321748, the parties in that proceeding agreed

that the Company would recover \$375,000 per year through the Rider USP for its Hardship Fund to make up the loss of funds that resulted from cancellation of the Citizens contract. Id. at 38.

On June 2, 2014, Columbia submitted its proposed USECP. On March 26, 2015, the Commission issued its Tentative Order in the USECP proceeding, identifying the issue of the Company collecting \$375,000 per year through the Rider USP for the Hardship Fund. USECP Order at 39. The Company, the OCA and CAUSE-PA filed comments and/or reply comments to the Company's proposed USECP. Id. at 1. On July 8, 2015, the Commission issued the USECP Order directing the parties in the instant base rate proceeding to address the issue of whether funds for the Hardship Fund should continue to be recovered through the Rider USP. Id. at 40.

B. Interpretation of the Commission's USECP Order.

Regarding Columbia's Hardship Fund, the Commission's USECP Order provides as follows:

Resolution: Although funding a Hardship Fund program through employee, customer, and stockholder contributions is less consistent than a flat charge added to Columbia's USP Rider, other NGDCs and the EDCs are able to fund their programs using only voluntary resources. We are not persuaded that Columbia cannot do so as well.

We agree with OCA that the Commission and relevant parties should address this issue through Columbia's current base rate proceeding at Docket No. R-2015-2468056.

USECP Order at 39-40.

OCA witness Roger D. Colton responded to the Commission's directive in the USECP Order by raising the issue in his surrebuttal testimony and making recommendations regarding whether collecting hardship funds through the Rider USP is proper and whether this practice should continue. See OCA St. 4-S at 7-13. Mr. Colton objected to Columbia paying for hardship funds with ratepayer dollars but recommended that the Company be provided time to plan for the removal of the funds are removed from Rider USP. Specifically, he recommended

that Columbia be directed to ramp up its fundraising efforts, continue to seek a replacement for the funding and be directed to address the issue in its next base rate case. Id. at 11.

I&E witness Christopher Keller also raised the Hardship Fund issue in response to the USECP Order. See I&E St. 2-SR at 18-19. Mr. Keller made the following recommendation:

I recommend the Company follow the Commission directive, and fund the Hardship fund through voluntary donations and not mandatory contribution via the Rider USP.

Id. at 19. Mr. Keller's recommendation has raised the question of what the USECP Order is directing the parties in the instant base rate case to do with regard to the Hardship Fund. Mr. Keller's recommendation seems to suggest that he has interpreted the USECP Order to direct the parties to end the recovery of \$375,000 through the Rider USP for the Hardship Fund in this base rate case.

The OCA disagrees with Mr. Keller's interpretation of the USECP Order. The USECP Order directs the parties to "address" the Hardship Fund receiving funding through the Rider USP in this base rate case, but the Commission did not make any specific determination regarding its continuation. The OCA submits that if the Commission had determined that Columbia should end its practice of collecting Hardship Funds through Rider USP, that the Commission would have specifically directed Columbia to make that change in its USECP Order. It did not. Instead, the Commission's USECP Order directed that the issue be examined in the base rate case.

The OCA submits that the USECP Order does not direct Columbia to discontinue Hardship Fund recovery through the Rider USP, nor does it direct the parties in the base rate proceeding to provide recommendations as to how Columbia should end this practice. As such,

the parties are free to make recommendations that address the Hardship Fund issue in any manner that is supported by evidence.

C. Parties' Recommendations on the Recovery through Rider USP of \$375,000 to Contribute to Hardship Funding.

All parties that addressed the Hardship Fund issue in testimony agree that the Company should end its practice of collecting Hardship Fund dollars through its Rider USP. The issue in dispute between the parties is *when* and *how* the Company should end the recovery. The OCA recommends that Columbia should be allowed to continue recovering the funds through the Rider USP until the Company files its next base rate case, with the Company being directed to include in its next filing a plan to address the issue. See OCA St. 4-S at 11. The OCA also recommends that the Company be directed to increase its fundraising efforts to replace the dollars that will be lost when the \$375,000 is removed from the Rider USP. Id. Columbia supports the OCA's recommendation. See Columbia St. 112-RJ at 4.

OCA witness Roger D. Colton explained in testimony why Hardship Funds should not be recovered through the universal service rider. See OCA St. 4-S at 8-10. Despite his objection to Columbia's practice of collecting Hardship Funds through the Rider USP, Mr. Colton did not recommend that Columbia be directed to end this practice immediately, given the circumstances of this case. Id. at 11. Instead, Mr. Colton recommended that the Company be provided time to plan for the replacement of this funding before the funds are removed from the rider. Id. Mr. Colton explained his recommendation as follows:

Continuing with the 2012 settlement at this time avoid[s] placing the Company in a position to either immediately ramp-up its Hardship Fund fundraising, or to experience a significant drop in Hardship Fund revenue.

OCA St. 4-S at 11.

The consequence of removing \$375,000 immediately from the Hardship Fund is not known at this time, but what is known is that Columbia's Hardship Fund is critically important to providing residential customers facing financial difficulties with the ability to maintain natural gas service. See CAUSE-PA St. 1-SR at 9. Columbia witness Nancy J. D. Krajovic testified that the \$375,000 that Columbia collects through the Rider USP for the Hardship Fund is still needed and that "Columbia continues to see an increase in fuel fund utilization." See Columbia St. 112-RJ at 4. The OCA submits that Mr. Colton's recommendation to allow Columbia to continue collecting \$375,000 for the Hardship Fund through the Rider USP, develop a plan to replace the funding and remove the funds from Rider USP in the Company's next base rate case is an appropriate balance between the interests of the residential customers who pay the Rider USP and those customers who utilize the Hardship Fund. Mr. Colton's recommendation moves the Company towards ending its practice of collecting the funds through the rider while simultaneously requiring Columbia to take steps to replace the dollars that will be lost. Providing the Company time to ramp up fundraising efforts or develop plans to replace the funds lost once the \$375,000 is no longer collected in the rider should help to avoid any negative impact on customers who utilize the Hardship Fund.

The OCA submits that Mr. Colton's recommendation is consistent with the Commission's USECP Order. The USECP Order directed parties to "address" the issue in the base rate proceeding but did not direct an immediate end to the funding mechanism established in the 2012 settlement. The Commission did not direct the parties to remove the funding in this proceeding. Mr. Colton cited the USECP Order as his reason for raising the Hardship Fund issue in the surrebuttal stage of the proceeding. See OCA St. 4-S at 7-8. As such, Mr. Colton was

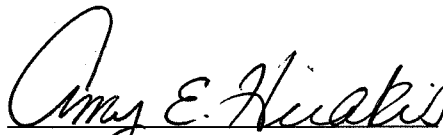
clearly aware of the USECP Order when he made his recommendation, and it follows that he developed his recommendation to comply with the USECP Order.

The OCA's recommendation that the Company be permitted to temporarily continue its practice of collecting \$375,000 through its Rider USP until its next base rate case, with the Company being directed to include in its next filing a plan regarding this issue, should be adopted by the Commission in conjunction with the OCA's recommendation that the Company be directed to increase its fundraising efforts for the Hardship Fund. The OCA's recommendations regarding the Hardship Fund balance the interests of both the residential customers who pay the Rider USP and the residential residents who utilize the Hardship Fund. Additionally, the OCA submits that its recommendation is consistent with the Commission's USECP Order.

IV. CONCLUSION

The Office of Consumer Advocate submits this Main Brief pursuant to the Order of Administrative Law Judge Mary D. Long entered April 21, 2015, and pursuant to the directions provided by the ALJ at hearings for this matter. The OCA's proposed Findings of Fact, Conclusions of Law and Ordering Paragraphs are provided in Appendix A, hereto.

Respectfully Submitted,



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August 27, 2015

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APPENDIX A

Proposed Findings of Fact:

1. Columbia's Hardship Fund is a program that provides financial assistance to residential customers who need help temporarily paying their bills. OCA St. 4-S at 10.
2. Hardship Funds are typically funded by voluntary donations from ratepayers, and are matched by a public utility's shareholders. OCA St. 4-S at 8, 9.
3. As part of Columbia's settlement in its 2012 base rate proceeding at Docket Number R-2012-2321748, the parties in that proceeding agreed that the Company would recover \$375,000 per year through the Rider USP for its Hardship Fund. OCA St. 4-S at 8.
4. On July 8, 2015, the Commission issued its Final Order (USECP Order) in Columbia's Universal Service and Energy Conservation Plan proceeding at Docket No. M-2014-2424462, directing the parties in the instant base rate proceeding to address the issue of whether funds for the Hardship Fund should continue to be recovered through the Rider USP. OCA St. 4-S at 7.

Proposed Conclusions of Law:

1. In the USECP Order, the Commission did not make any specific determination in its USECP Order regarding whether this practice should end.
2. Permitting Columbia to temporarily continue collecting \$375,000 for Hardship Funds through its Rider USP while the Company increases its fundraising efforts for the Hardship Fund does not violate the Commission's USECP Order.

Proposed Ordering Paragraphs:

1. Columbia will continue to recover \$375,000 for its Hardship Fund through its Rider USP.
2. Columbia will increase its fundraising efforts for the Hardship Fund, and seek input from and in collaboration with the Columbia Universal Service Advisory Committee and other interested parties.
3. Columbia will include in its next base rate filing a proposal to end recovery of the \$375,000 in Hardship Funds currently collected in its Rider USP.

CERTIFICATE OF SERVICE

Re: Pennsylvania Public Utility Commission :
v. : Docket No. R-2015-2468056
Columbia Gas of Pennsylvania, Inc. :

I hereby certify that I have this day served a true copy of the foregoing document, the Office of Consumer Advocate's Main Brief, 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 27th day of August, 2015.

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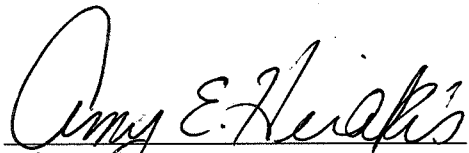
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