

COMMONWEALTH OF PENNSYLVANIA



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August 31, 2016

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

Re: Duquesne Light Company Universal
Service and Energy Conservation Plan for
2017-2019 Submitted in Compliance with
52 Pa. Code §§ 54.74
Docket No. M-2016-2534323

Dear Secretary Chiavetta:

Attached for electronic filing please find the Office of Consumer Advocate's Comments in the above-referenced proceeding.

Respectfully Submitted,

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

Enclosure

cc: Joseph Magee, Bureau of Consumer Services (jmagee@pa.gov, Email Only)
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BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Duquesne Light Company Universal :
Service and Energy Conservation Plan for : Docket No. M-2016-2534323
2017-2019 Submitted in Compliance with :
52 Pa. Code §§ 54.74 :

COMMENTS
OF THE
OFFICE OF CONSUMER ADVOCATE

The Office of Consumer Advocate (OCA) files these Comments in response to the Pennsylvania Public Utility Commission’s (Commission) Tentative Order issued August 11, 2016, in the above-captioned proceeding.¹

I. INTRODUCTION

On March 16, 2016, Duquesne Light Company (Duquesne or Company) filed the above-captioned Universal Service and Energy Conservation Plan (USECP or Plan) for the years 2017 through 2019, in accordance with the Commission’s regulations at 52 Pa. Code § 54.74(a), relating to electric universal service and energy conservation requirements. On August 11, 2016, the Commission entered its Tentative Order on the Plan which requested clarifications from the Company and comments from interested parties.

Duquesne’s Plan contains four major components: (1) Customer Assistance Program (CAP) that provides discounted bills for low-income residential customers; (2) a Low Income Usage Reduction Program (LIURP), called Smart Comfort, that provides weatherization and

¹ The OCA was assisted in the preparation of these Comments by its consultant, Roger D. Colton. Roger Colton is a principal in the firm of Fisher Sheehan & Colton, Public Finance and General Economics. Mr. Colton provides technical assistance to a variety of public utilities, state agencies and consumer organizations on rate and consumer service issues for telephone, water/sewer, natural gas and electric utilities. Mr. Colton’s work focuses on low-income energy issues, and he has testified and published extensively in this area.

usage reduction services to help reduce low-income customer utility bills and usage levels; (3) the Customer Assistance and Referral Evaluation Services (CARES) program which provides referral services for low-income and special needs customers; and (4) the Hardship Fund in which the Company partners with Dollar Energy Fund (DEF) to provide grants to customers with incomes up to 200% of the Federal Poverty Level (FPL) who have overdue balances and an inability to pay their bills. Tentative Order at 4.

The Tentative Order requested Comments and clarification from the Company on the following issues:

1. Explain how LIHEAP recipients automatically enrolled in CAP will be educated about the benefits and responsibilities of CAP.
2. Provide additional details about its “opt-in” policy for customers automatically enrolled into CAP.
3. Explain whether CAP enrollment is impacted when a customer transfers service from one residence to another within its service territory.
4. Explain why CAP customers who do not restore service within 14 days after service termination must stay out of CAP for one year.
5. Explain how income information from a PUC complaint is used to remove households from CAP and what rights a consumer has to dispute and/or clarify this information.
6. Explain the minimum payment requirements for CAP.
7. Provide details about its zero income verification procedure.
8. Consider replacing CFLs bulbs with LEDs as part of its standard LIURP measures.
9. Provide details regarding its health and safety guidelines and/or allowance thresholds for incidental repairs needed to provide weatherization services, including provisions for household disqualification.
10. Provide details of its LIURP quality control protocols and contractor training requirements.

11. Explain whether customers may provide alternate forms of identification for household members in lieu of SSNs when applying for a Hardship Fund grant.
12. Explain how it determines the Hardship Fund grant amount issued to an eligible household.
13. Identify the total cost of providing LIURP services to all eligible households within its service territory.

Tentative Order at 27-28.

The Tentative Order also invited interested parties to comment on the Company's proposed Plan. The OCA addresses the following additional issues in its Comments: (1) maximum CAP credit education and (2) the requirement for a Smart Comfort audit prior to CAP enrollment.

II. COMMENTS

A. LIHEAP Auto-Enrollment

In its 2017-2019 Plan, Duquesne proposes to automatically enroll Low Income Home Energy Assistance Program (LIHEAP) recipients in the CAP program at 85% of budget billing (or the highest income tier) and keep customers in CAP at this payment level indefinitely if the LIHEAP recipient does not respond to the Company's request for additional household income information. Tentative Order at 8. This is a change from the Company's current LIHEAP auto-enrollment policy. Under Duquesne's current 2014-2016 Plan, the Company automatically enrolls LIHEAP recipients into the CAP program at 100% of budget billing. Tentative Order at 7, citing Duquesne 2014-2016 Plan at 5. The Company then sends CAP customers a letter which explains the CAP benefits and requests verification of household income to determine the appropriate CAP discount. Tentative Order at 7. If the customer does not provide the appropriate income verification within six months, budget billing is discontinued and all deferred

arrearages are returned to the account balance. Tentative Order at 7, citing Duquesne 2014-2016 Plan at 5.²

The Tentative Order requests that Duquesne “detail how it will educate LIHEAP recipients who are automatically enrolled in CAP about the benefits and responsibilities of the program.” Tentative Order at 8. The Tentative Order identifies a concern about enrolling customers into CAP without their consent. Tentative Order at 8. The Tentative Order states:

Once enrolled in CAP, customers must make their CAP payment each month and must understand the consequences of default from CAP. Customers can only enroll to receive arrearage forgiveness through Duquesne’s CAP one time. Failing to honor a CAP payment plan can result in termination of service as specified in Chapter 14, 66 Pa. C.S. §§ 1401-418. It is essential that a customer being enrolled into a CAP understands the ramifications of such enrollment and obligations to make required timely payments.

Tentative Order at 8. The OCA shares the Commission’s concerns regarding LIHEAP auto-enrollment. The OCA also recommends that the Company maintain its existing program of requiring a follow-up verification of income by the CAP customer.

The OCA does not oppose the proposed change to allow LIHEAP recipients to receive a discount of 85% of the budget bill instead of the current 100% of budget bill. The OCA agrees that LIHEAP recipients who are auto-enrolled should have the opportunity to receive all of the benefits of CAP enrollment including the CAP discount, arrearage forgiveness, and LIURP treatments. The OCA, however, supports continuation of Duquesne’s current process of requiring that LIHEAP recipients provide further income verification within 6 months. The affirmation within 6 months of the CAP customer’s income provides benefits for the CAP customer.

² The OCA notes that if the current Plan is continued, the Company should clarify that the Company allows the CAP recipient to receive arrearage forgiveness for every month in which an on-time, in full payment is received. The language in the current Plan states that “all deferred arrearages” are returned to the customer’s balance which would appear to include those months for which the CAP recipient would have been eligible to receive arrearage forgiveness. See, Plan at 5.

The requirement for verification of the customer's income information is an essential part of the CAP customer's education about the program and an essential part of the CAP customer's understanding about the responsibilities under the program. The Tentative Order states that consumer education regarding the benefits and responsibilities of CAP typically occurs with the CAP application process. Tentative Order at 8. As the Commission correctly identifies, "without that, the customer may not know the importance of the associated payment responsibilities and their inability to obtain a payment agreement through the Commission once enrolled in CAP. 66 Pa. C.S. § 1405(c)." Tentative Order at 8. The auto-enrollment of LIHEAP recipients without a requirement of further verification means that some CAP customers may not fully understand that they are enrolled in the CAP program.

The CAP program offers benefits to the customer, including termination protections, a discounted bill, arrearage forgiveness, and weatherization through the Smart Comfort program. However, the CAP program also has certain responsibilities that will otherwise impact a low-income customer's rights for a further payment arrangement going forward. Once a CAP customer has been enrolled in CAP and accrues an outstanding balance, Section 1405(c) states that "Customer assistance program rates shall be timely paid and shall not be the subject of payment arrangements negotiated or approved by the commission." 66 Pa. C.S. § 1405(c). The payment arrangement restriction makes it crucial for all CAP customers, in particular those CAP customers who are automatically enrolled through the receipt of a LIHEAP grant, to understand fully the benefits and the responsibilities of CAP enrollment.³ Also, under Duquesne's program, CAP recipients are only eligible for arrearage forgiveness once. This is an important benefit that once lost cannot be restored.

³ Until the CAP customer affirmatively certifies for CAP, the OCA submits that Section 1405(c) of the Public Utility Code should not technically apply. Under Section 1405(c) of the Public Utility Code, the customer otherwise would likely be ineligible for a payment arrangement. 66 Pa. C.S. § 1405(c).

The OCA recommends that the Commission approve Duquesne's request to increase the discount provided to LIHEAP recipients from 100% of the budget bill to 85% of the budget bill. The OCA also recommends that the Company maintain its current policy of requiring CAP customers to verify their income within six months.

B. Requested Waiver of Recertification Process for LIHEAP Recipients.

The Tentative Order identifies a concern with Duquesne's proposal to waive the recertification requirements for CAP customers who continue to receive LIHEAP grants annually. Tentative Order at 9. The Tentative Order proposes to reject this proposal and directs the Company to recertify CAP households who annually receive a LIHEAP grant at least once every three years. Tentative Order at 9-11. The OCA supports the Commission's proposal to require that LIHEAP recipients be recertified at least once every three years.

Although the CAP Policy Statement requires CAP participants to recertify their income annually, the Commission has otherwise permitted utilities to recertify LIHEAP recipients every two or three years. Tentative Order at 10. Duquesne, Columbia Gas, National Fuel Gas, Philadelphia Gas Works, and the Peoples Natural Gas Companies require LIHEAP recipients to recertify every two years. Tentative Order at 10. PPL Electric and the UGI companies require LIHEAP recipients to recertify every three years. Tentative Order at 10. The FirstEnergy Companies continue to require LIHEAP recipients to recertify annually. Tentative Order at 10. The OCA submits that the recertification requirement should not be extended beyond three years. While the OCA prefers that LIHEAP recipients recertify their income every two years, the OCA understands that longer timeframes that have been approved for PPL and the UGI companies may provide some administrative efficiencies and benefits for some CAP programs.

The OCA submits that Duquesne should be required to maintain its policy of recertifying LIHEAP recipients at least once every two or three years. As the Commission correctly identifies in its Tentative Order, receipt of a LIHEAP grant does not reflect changes to a CAP household. Tentative Order at 10. Household income and the number of people in the household can change over time. These changes may impact the discount provided to the household. Tentative Order at 10-11. The recertification process is an opportunity to reassess the household to determine whether that household needs more assistance or does not need as much assistance.

The OCA submits that Duquesne's proposed change to eliminate recertification for LIHEAP recipients combined with its proposal to no longer require LIHEAP recipients to provide income information through a CAP application would mean that Duquesne would not have any opportunity to verify the household's actual income or circumstances. LIHEAP auto-enrollment is set at the lowest possible discount (85% budget bill payment). However, the range of discounts provided vary significantly from a 30% budget bill payment for customers at 0-50% of the Federal Poverty Level to 85% budget bill payment. Plan at 4. A CAP customer may not be aware that a modest change in income or household composition could provide the household with a much more significant benefit. This could impact the CAP customer's ability to maintain electric service if the CAP bill does not accurately reflect their circumstances.

The OCA recommends that the Commission require Duquesne to recertify LIHEAP recipients at least once every two to three years.

C. CAP Stay-out Provision

Duquesne's Plan provides that a CAP customer will be defaulted from CAP if the customer's service is terminated and not restored within fourteen days. Plan at 6. The Plan also

provides that a CAP customer who is “defaulted” may not be permitted to re-enroll for a period of one year, or until the cause of default has been satisfied at the Company’s discretion. Plan at 6. The Tentative Order identifies a concern with this proposed one-year stay-out and requests that Duquesne provide further reasons for imposing the stay-out and an explanation of how customers may satisfy the cause of the default. Tentative Order at 12. The OCA shares this concern.

The OCA does not oppose stay-outs for a CAP customer’s voluntary removal from CAP to prevent “churn,” or optimization of the seasonal fluctuations in usage to the detriment of other ratepayers. As the Commission’s Tentative Order notes, the Commission has approved stay-out provisions for PGW and Columbia’s program where a CAP customer voluntarily withdraws from CAP. Tentative Order at 12. However, this is not the scenario presented by Duquesne’s Plan. Duquesne’s Plan would require a stay-out for CAP customers who were involuntarily terminated. The OCA submits that CAP customers may have a variety of reasons for not restoring service within fourteen days – in particular, access to the necessary funds to pay the outstanding balance or access to resources such as LIHEAP cash or crisis assistance during the non-LIHEAP season months.

A CAP customer should not be removed from the CAP program for failure to pay a balance within 14 days. CAP is specifically designed for payment-troubled customers, and a CAP customer who is unable to afford the CAP payment balance is unlikely to be able to maintain service at full residential rates with an outstanding balance. By virtue of their participation in CAP, under Section 1405(c) of the Public Utility Code, the customer would also likely be ineligible for a payment arrangement. 66 Pa. C.S. § 1405(c). The Company’s proposed

involuntary termination provision would create additional barriers to CAP customers being able to restore and maintain service.

Moreover, the Plan does not identify the criteria for the one-year stay out or how a CAP customer may be reinstated before the end of the one year term. The Plan only states that “once defaulted from CAP, the customer may not be permitted to re-enroll for a period of one year, or until the cause of default has been satisfied at the Company’s discretion.” Plan at 6. As the Tentative Order states, the conditions for satisfaction of the “default” and reasons for application of the stay-out provision have not been identified. Tentative Order at 12-13. As a result, it is impossible to know under what conditions a low-income customer should be restored to the CAP program.

The OCA supports the Tentative Order’s request for further information regarding the requirements to be reinstated in the CAP program. However, the OCA submits that CAP customers should not be penalized with a one-year stay-out for failure to restore service within fourteen days.

D. Removal from CAP Based on Income Information from a PUC Complaint

The Tentative Order identifies a concern with Duquesne’s policy of using income information reported through a PUC informal complaint as proof of household income.

Tentative Order at 13. In its proposed 2017-2019 Plan, the Company states that:

if a customer is found to have greater income than what was originally reported (e.g., by means of a received PUC complaint, court records, factual testimony, company records, or other reputable source), the company may be defaulted from the CAP Program and back-billed at full tariff rate.

Plan at 6. The Tentative Order states that when BCS shares household income information with a utility in an attempt to resolve the complaint, it is not meant to be treated as verified. Tentative Order at 14. The Tentative Order correctly states that the Company may request the CAP

household to re-verify its income based on the information, but the Company may not base its determination solely on the information obtained from BCS or other “reputable sources.” Tentative Order at 14.

The OCA agrees with the Tentative Order’s approach regarding the verification of household income information obtained through the BCS or other sources. Depending upon the circumstances of the request, there could be a variety of legitimate reasons why the CAP customer’s income information provided to BCS or other sources may differ from the information provided at the time of the CAP application or recertification. For example, the information collected by BCS may not be an apples to apples comparison, *i.e.* annual income versus monthly income. A seasonal laborer, for example, may have a low total annual income but will have monthly variations in income that, viewed in isolation, may look different than the income information provided at the time of application. The income information could otherwise be completely consistent with the information provided at the time of application or recertification. The CAP participant should be provided the opportunity to verify their income or to clarify any discrepancy with information provided to BCS or obtained from other sources prior to removal from the CAP program or a change in the benefits provided under CAP.

E. Minimum Bill

The Tentative Order identifies a concern with Duquesne’s policy regarding minimum bill payments. Tentative Order at 14. The Tentative Order states that:

Duquesne determines the monthly payment amount for CAP customers based on a percentage of the household’s budget billing. Customers in the program pay a minimum of 30% and a maximum of 85% of their budget bill for electric service.

Tentative Order at 14. The Plan does not include a minimum bill payment requirement, and the Tentative Order requests that Duquesne explain its minimum payment requirements. Tentative Order at 14.

The OCA submits that a minimum bill payment should be identified in the Plan. Section 69.265(3) (B), (C) of the Commission's CAP Policy Statement states:

The utility should include the following control features to limit program costs:

- (i) Minimum payment terms...
- (B) A CAP participant payment for a nonheating account should be at least \$12-\$15 a month.
- (C) A CAP participant payment for an electric heating account should be at least \$30-\$40 a month.

52 Pa. Code §§ 69.265 (3)(i)(B), (C). The OCA submits that the stated purpose of the minimum payment requirement is to control the overall costs of the program and the costs of discount provided to CAP customers and paid for by residential ratepayers.

In addition to a cost control measure, the minimum payment is also an important tool. The minimum monthly payment requires customers to share in the monthly responsibility of the costs of electric service and to also receive the benefits of the arrearage forgiveness for that payment. The monthly minimum payment requirement also requires the customer to establish the habit of paying the electric bill on a monthly basis and to conserve its maximum CAP credits for a month when the credit is need.

For all the reasons set forth above, the OCA submits that the Plan should include a minimum monthly payment.

F. Social Security Numbers

Duquesne's Plan requires customers to provide Social Security numbers for all household members in order to qualify for a Hardship Fund grant. Plan at 14. Duquesne does not require

CAP customers to provide Social Security numbers for a Hardship Fund grant. Plan at 4. CAP customers are permitted to verify their identity with a driver's license or other type of government issued identification. Plan at 4. The Tentative Order requests that Duquesne reconsider its policy for its Hardship Fund. Tentative Order at 20. The OCA agrees that a Social Security number should not be required for receipt of a Hardship Grant without demonstration of a need for such information.

In its Plan, the Company has not provided any reasons why a Hardship Fund grant should be treated differently than a CAP customer. The Tentative Order identifies that PECO and PGW have also changed their policies and allow CAP customers to provide alternate forms of identification for household members in lieu of Social Security numbers. Tentative Order at 20, citing PECO 2013-2015 USECP, Docket No. M-2012-2290911, Order at 36-38 (April 4, 2013); PGW 2014-2016 USECP, Docket No. M-2013-2366301, Order at 10-11 (August 20, 2014).

There are many potential issues that are raised by requiring a customer to provide a Social Security number: (1) potential security issues with maintaining Social Security numbers and how Duquesne will protect this information⁴; (2) an explanation of how this information will be used by the Company and why it is necessary; (3) how the information will be disposed of, or if it will be disposed of, if the customer leaves the service territory; (4) the implications if the Hardship Fund requester does not have a Social Security number; (5) the potential unwillingness of a customer to provide the Social Security number; and (6) an evaluation of the costs of implementing such a requirement against the benefits of having this information.

⁴ The Federal Trade Commission has a "Red Flags Rule" regarding the security and protection of Social Security Numbers and has particular provisions with respect to how public utilities must manage this information. See, 16 C.F.R. §§ 682.1, 682.3 (2012); 12 C.F.R. §§ 222.90(b)(5), 222.90(d)(1) (2012).

None of these issues have been identified or addressed by Duquesne's proposal to require Hardship Fund grant recipients to provide Social Security numbers as a precondition for receiving a Hardship Fund grant or why its policies should differ from its requirements for CAP participants. Duquesne should not be permitted to require such information. If there is a true necessity shown, Duquesne must also address the privacy concerns of the collection, protection of the data, use and disposal of the information, and sharing of the information with other third party entities.

For the reasons set forth above, the OCA supports the Commission's Tentative Order regarding the elimination of the requirement to provide a Social Security number for a Hardship Fund grant.

H. Other Issues

1. Maximum CAP Credit Education

In Duquesne's most recent six-year evaluation, the evaluator, APPRISE, recommended that Duquesne provide "information to CAP customers on the customer's electric usage, the CAP credit limit, how much CAP credit the customer has used to date, and how much CAP credit is remaining." APPRISE Evaluation at 79. APPRISE found that many CAP participants did not know the maximum CAP credit amount or even that such a maximum CAP credit existed. APPRISE Evaluation at 80.

The OCA supports APPRISE's recommendation and submits that the Company consider providing additional educational information to CAP participants regarding the maximum CAP credit. The maximum CAP credit is an important cost control measure and an important feature for CAP participants to understand. Exceeding the maximum CAP credit may cause CAP

participants to lose the benefits of the program, and CAP customers should understand how their usage tracks with the maximum CAP credit.

2. Smart Comfort Home Visit Prior to Enrollment in CAP.

Duquesne's Plan requires low-income customers to participate in a Smart Comfort home visit prior to enrollment in the CAP program. Plan at 5. The Plan states:

All residential service customers who own their own home and have a base load usage in excess of 500 kWh per month may be required to complete a Smart Comfort visit before enrollment in CAP.

Plan at 5. The Plan includes similar language for tenants and for all electric heating customers.

Plan at 5. The OCA is concerned because the Plan does not provide information regarding whether the low-income customer's CAP status is delayed or impacted by this requirement. The OCA submits that the low-income customer's CAP enrollment should not be delayed due to the Smart Comfort home visit requirement. In addition, if there is an impact to CAP participation or enrollment, Duquesne should identify the impact so the stakeholders can consider the proposal.

The CAP Policy Statement requires CAP customers to participate in LIURP as a condition of participation in the CAP, but the CAP Policy Statement does not require CAP customers to undergo a Smart Comfort evaluation prior to enrollment in CAP. See, 52 Pa. Code § 69.265(7)(v). The Plan is not clear regarding whether a CAP customer may be temporarily enrolled in the program, pending completion of the Smart Comfort home visit. The Plan is also unclear how this requirement is implemented with the automatic enrollment of LIHEAP recipients and whether LIHEAP recipients are treated in a similar manner as other low-income CAP applicants. To extent that the Company does not already do so, the OCA recommends that the Company allow CAP customers to temporarily enroll in CAP, pending the Smart Comfort home visit. Logistically, it may require a period of weeks or a few months to schedule the Smart

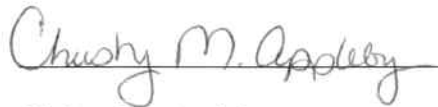
Comfort home visit due to factors outside of either Duquesne's or the customer's control. The OCA submits that a customer should be allowed to receive the benefits of CAP unless the CAP customer refuses to participate in the Smart Comfort program or meets one of criteria for exceptions to LIURP participation such as landlord refusal.

The OCA fully supports the requirement that CAP participants allow for a Smart Comfort home visit as a condition of CAP participation. However, CAP program benefits should not be delayed due to the requirement for a Smart Comfort home visit. The OCA requests that the Company clarify the timeline for the Smart Comfort home visit in its Plan and clarify how LIHEAP recipients who are automatically enrolled are treated.

III. CONCLUSION

WHEREFORE, the Office of Consumer Advocate appreciates the opportunity to provide Comments on this Tentative Order. The OCA respectfully requests that the Company's Plan be amended in accordance with the Tentative Order and the above Comments.

Respectfully Submitted,



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DATE: August 31, 2016

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CERTIFICATE OF SERVICE

Duquesne Light Company Universal :
Service and Energy Conservation Plan for : Docket No. M-2016-2534323
2017-2019 Submitted in Compliance with :
52 Pa. Code §§ 54.74 :

I hereby certify that I have this day served a true copy of the foregoing 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 31st day of August 2016.

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