

COMMONWEALTH OF PENNSYLVANIA



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October 14, 2016

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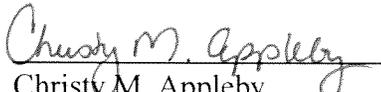
Re: Petition of PECO Energy Company
For Approval of its Default Service Program for the
Period from June 1, 2017 through May 31, 2019
Docket No. P-2016-2534980

Dear Secretary Chiavetta:

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

Copies have been served per the attached Certificate of Service.

Respectfully submitted,


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Assistant Consumer Advocate
PA Attorney I.D. # 85824

Attachment

cc: Honorable Cynthia Williams Fordham, ALJ
ra-OSA@pa.gov (email only)
Certificate of Service

226518

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Petition of PECO Energy Company :
For Approval of its Default Service :
Program for the Period Service Plan : Docket No. P-2016-2534980
For the Period from June 1, 2017 Through :
May 31, 2019 :

EXCEPTIONS
OF THE OFFICE OF CONSUMER ADVOCATE

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DATED: October 14, 2016

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I. Introduction

On October 4, 2016, Administrative Law Judge Cynthia Williams Fordham issued her Recommended Decision (R.D.) in the PECO Default Service Plan (DSP) proceeding for service beginning June 1, 2017 (DSP IV). Relevant to these Exceptions, ALJ Fordham recommended that the proposed Customer Assistance Program (CAP) shopping program rules be deferred to another proceeding. Under PECO's current CAP program, CAP customers are not able to shop for electric generation supply. A CAP Shopping Plan would establish the rules to allow customers in CAP to participate in the retail electric choice market. PECO did not propose a CAP Shopping Plan in this DSP proceeding for service beginning June 1, 2017. A CAP Shopping plan with consumer protections has been proposed by CAUSE-PA in this proceeding for the upcoming DSP IV.

The ALJ's decision to defer the CAP Shopping decision is based upon the Commission's Secretarial Letter in the remand for PECO's DSP II proceeding. See, [Petition of PECO Energy Company for Approval of its Default Service Plan](#), Docket No. P-2012-2283641, Secretarial Letter (May 11, 2016) (Secretarial Letter). In the Secretarial Letter, the Commission deferred the CAP shopping issue to PECO's DSP III which will expire on May 31, 2017. Secretarial Letter at 2. The Secretarial Letter does not define the process for how CAP shopping should be addressed in the DSP III proceeding. On September 1, 2016, PECO filed a proposed rule revision in the DSP II docket for CAP shopping starting April 14, 2017.

The OCA submits that substantial evidence has been presented in this proceeding which demonstrates that there is a clear need to implement a CAP Shopping Plan with consumer protections. A specific shopping program for CAP customers must be developed to address their unique challenges. The OCA submits that there is no procedural reason or bar to addressing

CAP Shopping in this proceeding for the upcoming DSP IV plan period beginning June 1, 2017. This is particularly the case where all of the necessary evidence has been presented in this proceeding. Another proceeding to address the need for CAP Shopping for the DSP IV period would be unnecessarily duplicative.

The OCA raises two Exceptions regarding the ALJ's Recommended Decision. The OCA's Exceptions argue that the ALJ erred in her decision: (1) to refer the CAP Shopping issue to a future undefined proceeding and (2) to not address the need for CAP Shopping protections in DSP IV.

II. Exceptions

OCA Exception No. 1: The ALJ erred in her recommendation to refer the CAP Shopping issue to a future proceeding. (R.D. at 57-58; OCA I.B. at 13-27; OCA R.B. at 3-17)

In her Recommended Decision, ALJ Fordham concluded that a decision regarding CAP Shopping protections should be deferred to a future proceeding. The ALJ concluded:

Although CAUSE-PA, the OCA and TURN *et al.* make valid points about CAP Shopping, PECO did not submit a CAP Shopping Plan in this proceeding. Based on the Secretarial Letter, PECO is filing its plan in another proceeding. It is important that PECO be allowed to present its plan before a ruling is made. Furthermore, if the undersigned ruled on the proposals submitted in this proceeding, it might conflict with a ruling in the other proceeding. The undersigned recommends that PECO's proposal to file its plan in another proceeding be approved. Consequently, the undersigned will not address the CAP Shopping issue in this proceeding.

R.D. at 57-58. The OCA respectfully submits that a full evidentiary record regarding the need for CAP Shopping protections was established in this proceeding for the DSP IV period and should be considered on the merits in this proceeding.

Although PECO did not propose a CAP Shopping Plan in this proceeding, the Company originally proposed a CAP Shopping Plan with price protections for CAP customers in its DSP II

proceeding. In that proceeding, the issue of whether the Commission had the authority to approve CAP shopping protections was addressed. CAUSE-PA, et al. v. Pa. PUC, 120 A.3d 1087 (Pa. Cmwlth. Ct. July 14, 2015), *cert denied* 2016 PA. LEXIS 723 (Pa. April 5, 2016) (PECO CAP Shopping). In PECO CAP Shopping, the Commonwealth Court stated that the Customer Choice Act “does not demand absolute and unbridled competition.” PECO CAP Shopping at 1101. The Commonwealth Court stated that “under certain circumstances, unbridled competition may have to give way to other important concerns.” PECO CAP Shopping at 1103. The Commonwealth Court has established that the Commission has the authority to require EGSs voluntarily participating in the CAP Shopping Plan to adhere to the conditions of the CAP Shopping program so long as those conditions are designed to meet the statutory standards of maintaining affordability, cost-effective and justness and reasonableness of the rates of the non-CAP customers who pay the costs of the programs.

After reviewing the record, the Commonwealth Court reversed the Commission Order’s which approved the imposition of early cancellation or termination fees. PECO CAP Shopping at 1103-1104. The Commonwealth Court then remanded the case to the Commission with the specific direction to implement program rules that did not include cancellation or termination fees. PECO CAP Shopping at 1103-1104. On July 19, 2016, the Commission issued a Secretarial Letter in the original docket for the Commonwealth Court appeal, PECO’s DSP II proceeding. Petition of PECO Energy Company for Approval of its Default Service Plan, Docket No. P-2012-2283641, Secretarial Letter (May 11, 2016) (Secretarial Letter). In that letter, the Commission directed PECO to file a proposed rule revision to its CAP Shopping Plan in its DSP III consistent with the Commonwealth Court’s Order. Secretarial Letter at 2.¹ The

¹ The OCA notes that the DSP III will expire on May 31, 2017.

Commission also affirmed its legal authority to implement CAP Shopping program rules. Id. The Secretarial Letter did not address the on-going DSP IV proceeding. The Secretarial Letter also did not specifically identify any process for review of the filing or provide an opportunity for a hearing on the matter.

As the ALJ correctly identifies, in this proceeding, PECO did not present a CAP Shopping Plan. R.D. at 57. PECO witness McCawley stated that the Company planned to introduce a CAP Shopping Plan in its DSP III docket with no price restrictions and no cancellation fees on or around August 2016. PECO St. 2-R at 13-15.² A CAP Shopping Plan for DSP IV has been presented in this proceeding by CAUSE-PA witness Geller, and the ALJ's decision declined to address the merits of the CAUSE-PA proposal. R.D. at 57-58.

CAUSE-PA proposed a Customer Assistance Program - Standard Offer Program (CAP-SOP) that would provide CAP customers an opportunity to shop while helping to ensure affordability. As proposed, the CAP-SOP provides that: (1) the CAP customer would be allowed to enroll with a supplier only if they enrolled through a CAP-SOP; (2) the CAP customer would be enrolled in an SOP similar to the existing residential customer Standard Offer Program, which would provide 7% off the PTC at the time of enrollment; (3) if the PTC decreased by more than 7% off the enrollment PTC, the participating EGS would either re-enroll the customer at a new 7% discount or return the customer to default service;³ and (4) at the end of the 12 month term, the EGS could either re-enroll the customer at a new 7% off the effective PTC or return the

² On September 1, 2016, PECO did make a tariff filing in the DSP II docket. See, PECO's Customer Assistance Program Shopping Plan, Proposed Rule Revision, Docket No. P-2012-2283641 (September 1, 2016). The tariff filing identified a proposed CAP Shopping program with no price protections except to require that EGSs may not charge a cancellation or termination fee. The tariff proposed an effective date of April 14, 2017. To date, the Commission has not taken any further action on the tariff filing.

³ As explained in the Direct Testimony of Mr. Geller, the EGS would only have to adjust the enrollment if the PTC drop was more than 7%. CAUSE-PA St. 1 at 32, fn. 56.

customer to default service. CAUSE-PA St. 1 at 31-33. The OCA submits that CAUSE-PA's CAP-SOP is a reasonable Plan for DSP IV.⁴ The CAP-SOP is designed to preserve the affordability for CAP customers and to address the costs that are paid for by all other non-CAP residential customers.

The OCA respectfully submits that the ALJ erred in concluding that the DSP IV is not the appropriate forum to address CAP Shopping during DSP IV. In this proceeding, new evidence regarding the shopping experience of CAP customers in the PPL and the FirstEnergy Companies service territories has been presented that was not available in prior proceedings. The OCA submits that referring action on CAP Shopping protections for DSP IV to a proceeding addressing DSP II and DSP III is not reasonable when a full record and a reasonable plan have been presented in this case. Clearly, issues regarding retail choice and access to the competitive retail markets have been addressed in the context of default service proceedings since their inception. See, Joint Petition of Metropolitan Edison Company, Pennsylvania Electric Company, Pennsylvania Power Company and West Penn Power Company for Approval of their Default Service Programs, Docket Nos. P-2011-2273650, P-2011-2273668, P-2011-2273669, P-2011-3760, Order at 101-156 (August 16, 2012); Petition of PECO Energy Company for Approval of its Default Service Program II, Docket No. P-2012-2283641, Order at 76-151 (October 12, 2012); Petition of PPL Electric Utilities Corporation for Approval of a Default Service Program and Procurement Plan, Docket No. P-2012-2302074, Order at 128-183 (January

⁴ The OCA notes that the OCA also recommended that a stakeholder group be developed in order to address the details of implementation of the CAP Shopping Plan prior to the program's implementation. OCA St. 2-SR at 7; OCA I.B. at 22-23. The OCA also recommended that a CAP shopping program should not be implemented until, at the earliest, June 1, 2017. OCA 2-R at 3-4; OCA I.B. at 25-27. Simultaneous with the CAP Shopping Plan issues, the Commission has also been examining the affordability of PECO's CAP customer program design. Effective October 2016, the program will become a Fixed Credit Option (FCO) program. Given the complexity of the proposed program design changes and the potential for customer confusion, the OCA, CAUSE-PA and TURN et al. recommended that the CAP Shopping Plan should not be implemented until June 1, 2017. OCA St. 2-R at 3-4; CAUSE-PA St. 1 at 14; TURN *et al.* St. 1-SR at 11.

24, 2013); Petition of Duquesne Light Company for Approval of a Default Service Program and Procurement Plan for the Period June 1, 2013 through May 31, 2015, Docket No. P-2012-2301664, Order at 81-205 (January 24, 2013). There is no reason to pass on this important issue in this case.

The ALJ's decision incorrectly concludes that there is a procedural bar to addressing CAP Shopping in this proceeding because PECO has not raised a specific CAP Shopping Plan. R.D. at 57-58. A fully developed plan, however, supported by expert testimony, has been presented here.⁵ TURN *et al.* witness Bertocci testified regarding why it is appropriate to address the rules for CAP customer shopping in this proceeding. TURN *et al.* witness Bertocci testified:

Accordingly, unlike Mr. White, I believe the Commonwealth Court order, and the Commission's Secretarial Letter must be read to permit the parties to examine PECO's CAP shopping program in this DSP IV proceeding. As noted above, the Commonwealth Court has specifically mandated that the review of CAP shopping be periodically undertaken – doing so is part of the “continuing nature” of the PUC's oversight, as required by the Choice Act. Moreover, the Commission's Secretarial Letter was entered on PECO's DSP II docket, P-2012-2283641. I am aware of no basis for the Commission's Secretarial Letter in PECO's 2012 DSP proceeding, or any other prior decision or determination, to somehow prejudice the positions of the parties regarding PECO's CAP shopping plan in this DSP IV proceeding, which commenced several years after the close of the record in PECO's DSP II.

TURN *et al.* St. 1-SR at 6. The OCA submits that the Secretarial Letter left open the opportunity for parties to address CAP Shopping for DSP IV and should not be interpreted restrictively to prohibit addressing the issue on a going-forward basis. Secretarial Letter at 2.

Moreover, the issue of CAP customer shopping has been addressed this year in the other 2017 DSP proceedings for PPL and the FirstEnergy Companies. See, Petition of PPL Electric

⁵ The OCA notes that a similar CAP-SOP was presented in PPL's current DSP proceeding and recommended for approval by ALJ Susan D. Colwell. Petition of PPL Electric Utilities Corporation for Approval of a Default Service Program and Procurement Plan for the Period June 1, 2017 Through May 31, 2021, Docket No. P-2016-2526627, Recommended Decision (August 10, 2016)

Utilities Corporation for Approval of a Default Service Program and Procurement Plan for the Period June 1, 2017 Through May 31, 2021, Docket No. P-2016-2526627, Recommended Decision at 55-56 (August 10, 2016) (PPL DSP IV R.D.)⁶; Petition of Metropolitan Edison Company for Approval of a Default Service Program for the period Beginning June 1, 2017, through May 31, 2019, Docket No. P-2015-2511333, Recommended Decision at 34-36 (April 15, 2016); Petition of Pennsylvania Electric Company for Approval of a Default Service Program for the period Beginning June 1, 2017, through May 31, 2019, Docket No. P-2015-2511351, Recommended Decision at 34-36 (April 15, 2016); Petition of Pennsylvania Power Company for Approval of a Default Service Program for the period Beginning June 1, 2017, through May 31, 2019, Docket No. P-2015-2511355, Recommended Decision at 34-36 (April 15, 2016); Petition of West Penn Power Company for Approval of a Default Service Program for the period Beginning June 1, 2017, through May 31, 2019, Docket No. P-2015-2511356, Recommended Decision at 34-36 (April 15, 2016) (Collectively FE DSP R.D.).⁷

The OCA respectfully submits that it is appropriate to address the CAP Shopping in this forum. A CAP Shopping Plan has been presented by CAUSE-PA and the parties have had the opportunity to testify about the proposed CAP Shopping Plan. A full and complete record has also been developed in this proceeding regarding the need for additional CAP Shopping protections. The OCA respectfully requests that the Commission address the CAP Shopping proposal made in this proceeding.

⁶ The OCA notes that the PPL DSP matter is currently pending before the Commission.

⁷ The OCA notes that the FE DSP matter is currently pending before the Commission.

OCA Exception No. 2: The ALJ erred in her decision to not address the need for consumer protections for CAP Shopping. (R.D. at 57-58; OCA I.B. at 16-20; OCA R.B. at 5-12)

The ALJ erred in her decision by not finding that CAP Shopping consumer protections are necessary for the upcoming DSP IV period. R.D. at 57-58. Beyond identifying that CAUSE-PA, TURN *et al.*, and the OCA “make valid points,” the ALJ’s decision does not address the merits of CAUSE-PA’s CAP Shopping proposal or the substantial harms that have been identified should CAP Shopping be implemented without CAP Shopping protections. See, R.D. at 57. RESA and PECO’s proposal in this proceeding is to allow CAP customers to shop with essentially no consumer protections.⁸ RESA I.B. at 10-11; PECO I.B. at 5-9. The OCA submits that the evidence presented in this case demonstrates that there is a clear need to implement CAP Shopping program protections and develop a specific shopping program to address the unique challenges of CAP customers. See, OCA I.B. at 16-20, OCA R.B. at 5-12.

In his Direct Testimony, CAUSE-PA witness Geller described the impacts on CAP customer affordability and CAP program costs without effective CAP Shopping program rules. See, CAUSE-PA St. 1 at 18-19. As Mr. Geller points out, CAP customers are economically vulnerable, low-income customers with limited funds for the necessities of life, including electricity. CAUSE-PA St. 1 at 6, 15-17, 22-24; CAUSE-PA M.B. at 18-20; TURN *et al.* M.B. at 18-19. CAP customers are enrolled in CAP because they otherwise have difficulty paying the full residential customer rate at PECO’s Price to Compare. CAP customers require a discounted rate, paid for by all other non-CAP residential ratepayers, in order to maintain essential electric service. CAUSE-PA St. 1 at 30.

⁸ The OCA notes that PECO witness McCawley stated the Company’s proposed rule revision would “prohibit CAP customers and EGSs from entering into any contract that imposes early cancellation or termination fees.” PECO St. 2-R at 13.

CAUSE-PA witness Geller identified significant harms to both CAP customers and non-CAP residential ratepayers who pay the costs of the program from CAP shopping without adequate protections. CAUSE-PA St. 1 at 18-19. CAUSE-PA witness Geller examined the impact of CAP customer shopping on CAP customer affordability in the five Pennsylvania service territories (PPL and the four FirstEnergy Companies (Met-Ed, Penelec, Penn Power, and West Penn Power)) that allow CAP Shopping without restrictions. CAUSE-PA St. 1 at 27-28. Of critical importance here, Mr. Geller demonstrated that in 2015, an average of 46% of PPL's CAP shopping customers paid more than the Price to Compare (PTC). CAUSE-PA St. 1 at 27. In addition, for every month from January 2012 to February 2016, on average, at least 42% of PPL's CAP Shopping customers paid more than the PTC, and in six of those months, on average, 88% to 99% of PPL's CAP shopping customers paid more than the PTC. CAUSE-PA St. 1 at 27.

In PPL's service territory, CAP shopping customers not only paid more on average than the Price to Compare, but the CAP shopping customers paid significantly more than the Price to Compare in the months when their EGS price was higher than the PTC. CAUSE-PA witness Geller testified:

The data also shows that those customers who paid more than the price to compare paid significantly more, as compared to the savings achieved by customers who paid less than the price to compare. In the month in which CAP customers who shopped paid the highest percentage more than the price to compare, they paid on average 101% more per kWh. But in the month when CAP customers who shopped achieved the greatest savings, they paid only 14% less than the price to compare.

CAUSE-PA St. 1 at 28.

It is not just the affordability for CAP customers but the increased costs to non-CAP customers for the program. The amount that is paid by non-CAP ratepayers is referred to as the

CAP Shortfall. The amount of the CAP Shortfall will increase when the customer is charged a price by an EGS that is higher than PECO's Price to Compare. Those increased costs will flow through to other ratepayers. As discussed in Mr. Geller's Direct Testimony, PPL's non-CAP residential customers have annually paid a net \$2.74 million more for the CAP program exclusively due to CAP shopping. As CAUSE-PA witness Geller testified, "the net impact of CAP customer shopping over the 46-month period from January 2012 through October 2015 is \$2,743,872 per year." CAUSE-PA St. 1 at 29.

The experiences of FirstEnergy Company customers have been consistent with the experiences of PPL's CAP shopping customers. Mr. Geller testified that as of November 2015, "more than 77% of Met-Ed's CAP customers, more than 50% of Penelec's CAP customers, and more than 65% of West Penn's CAP customers who are shopping are paying a price higher than the price to compare." CAUSE-PA St. 1 at 29.

The OCA submits that the similar experiences in all five of the service territories demonstrate the consistent harms experienced by both CAP shopping customers and non-CAP residential customers who pay the cost of CAP. The PPL and FirstEnergy Companies' experiences demonstrate a clear need for additional protections to be provided for PECO's CAP customers. The OCA submits that the CAP-SOP is a reasonable solution. The CAP-SOP will allow CAP customers to access the retail choice market and at the same time to be protected from the potential and realized harms that have occurred in PPL's and FirstEnergy's service territories. The OCA submits that the ALJ erred in not recommending that the CAP shopping protections contained in CAUSE-PA's CAP-SOP proposal be implemented as part of DSP IV.

III. Conclusion

For the reasons set forth above, and for the reasons set forth in the OCA's Briefs, the OCA respectfully submits that the ALJ erred in her recommendation to defer a ruling on CAP Shopping protections until a future proceeding. The ALJ also erred in her determination to not address the merits of the CAUSE-PA CAP Shopping proposal. The OCA requests that the Commission grant these Exceptions and adopt the modifications and recommendations herein and in the OCA's Main Brief and Reply Brief.

Respectfully Submitted,



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Petition of PECO Energy Company :
For Approval of its Default Service :
Program for the Period Service Plan : Docket No. P-2016-2534980
For the Period from June 1, 2017 Through :
May 31, 2019 :

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

Dated this 14th day of October 2016.

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