

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

|                        |   |                |
|------------------------|---|----------------|
| Marilyn Carey          | : |                |
|                        | : |                |
| v.                     | : | C-2017-2633794 |
|                        | : |                |
| Philadelphia Gas Works | : |                |

**INITIAL DECISION**

Before  
Eranda Vero  
Administrative Law Judge

**INTRODUCTION**

This Initial Decision denies Marilyn Carey’s formal Complaint against Philadelphia Gas Works at Docket No. C-2017-2633794, because she failed to carry her burden of proving by a preponderance of the evidence that: 1) her gas bills from the utility are incorrect or abnormally high; and 2) she qualifies for a new payment arrangement.

**HISTORY OF THE PROCEEDING**

On November 9, 2017, Marilyn Carey (Complainant or Ms. Carey) filed a formal Complaint (Complaint) against Philadelphia Gas Works (PGW, Respondent or the Company) with the Pennsylvania Public Utility Commission (Commission) alleging that the Respondent is threatening to shut off her gas service, that she is unable to pay her gas bills to PGW, and that her bills from PGW are abnormally high. As relief, Ms. Carey requested that the Commission review her account with PGW and establish a payment arrangement on her behalf.

On December 5, 2017, PGW filed an Answer denying all material allegations of fact and conclusions of law in the Complaint.

By Hearing Notice dated December 19, 2017, a hearing was scheduled as part of the morning session of a call of the docket hearing on Thursday, February 15, 2018, at 9:30 a.m., and the matter was assigned to me. Later it was determined that the present Complaint was not a good candidate for a call of the docket hearing. Consequently, the case was scheduled to be heard separately at a later date.

A Hearing Cancellation/Reschedule Notice dated February 15, 2018, notified the parties that an initial hearing was scheduled for Tuesday, April 10, 2018, at 10:00 a.m.

A Prehearing Order was issued on March 12, 2018, reminding the parties of the date and time of the scheduled hearing, informing them of the procedures applicable to this proceeding, and directing the submission of documents prior to the hearing.

The initial hearing convened as scheduled on April 10, 2018. The Complainant appeared *pro se* and testified in support of the Complaint. Graciela Christlieb, Esq., represented the Respondent, and presented the testimony of Patricia Bernard, who is a Customer Review Officer for PGW in charge of investigating formal and informal customer complaints filed with the Commission against the Company. The Respondent sponsored five exhibits, which were admitted into the record.

The record in this matter closed upon receipt of the transcript on May 10, 2018.

#### FINDINGS OF FACT

1. The Complainant is Marilyn Carey, who resides at 238 East Durham Street, Philadelphia, PA 19119 (Service Address). Tr. 7.

2. Ms. Carey is the sole tenant and resident at the Service Address. Tr. 25.

3. The Service Address is a 1,760 square foot, two-story, single-family house with three bedrooms and a basement. Tr. 25, 63-64, PGW Exhibit 5.

4. The Service Address is an old house, with poor insulation and in need of repairs. Tr. 17-18, 24-25, 67.

5. During the period from November 25, 2014 to October 13, 2016, Ms. Carey was enrolled in PGW's Customer Responsibility Program (CRP). Tr. 32, 58, PGW Exhibit 1.

6. During her participation in PGW's CRP program, Ms. Carey's gas bills were not based on her gas usage but were calculated as a percentage of her income. Tr. 31, 32.

7. Due to her participation in PGW's CRP program, Ms. Carey's gas bill was \$45.00 invariably every month during the period from November 25, 2014 to October 13, 2016. PGW Exhibit 1.

8. On October 13, 2016, Ms. Carey was removed from PGW's CRP program due to her failure to recertify. Tr. 58.

9. At the time of her removal from CRP on October 13, 2016, Ms. Carey's pre-program balance of \$3,935.38, which had been set aside during her participation in the program, was returned to her account. Tr. 32-33, PGW Exhibit 1.

10. After her removal from CRP on October 13, 2016, Ms. Carey's gas bills were calculated based on her gas usage. Tr. 33, PGW Exhibit 1.

11. After her removal from CRP, Ms. Carey's bills for gas service at the Service Address during the colder months were as follows:

| Date       | CCF usage | HDD <sup>1</sup> | Billed amount |
|------------|-----------|------------------|---------------|
| 11/23/2016 | 356       | 416              | \$503.81      |
| 12/27/2016 | 499       | 729              | \$659.69      |
| 1/27/2017  | 569       | 886              | \$818.46      |
| 2/28/2017  | 451       | 657              | \$678.69      |
| 3/28/2017  | 404       | 661              | \$565.13      |
| 11/24/2017 | 296       | 423              | \$403.76      |
| 12/27/2017 | 474       | 819              | \$674.52      |
| 1/29/2018  | 604       | 1088             | \$826.72      |
| 2/27/2018  | 427       | 738              | \$687.04      |
| 3/28/2018  | 386       | 721              | \$507.46      |

PGW Exhibit 1.

12. For the period of November 9, 2014 to April 2, 2018, Ms. Carey's gas usage at the Service Address during the colder months was as follows:

| Date       | CCF | HDDs |
|------------|-----|------|------------|-----|------|------------|-----|------|------------|-----|------|
| 11/25/2014 | 277 | 527  | 11/24/2015 | 233 | 331  | 11/23/2016 | 356 | 416  | 11/24/2017 | 296 | 423  |
| 12/26/2014 | 436 | 788  | 12/23/2015 | 324 | 451  | 12/27/2016 | 499 | 729  | 12/27/2017 | 474 | 819  |
| 1/27/2015  | 516 | 1069 | 1/27/2016  | 512 | 927  | 1/27/2017  | 569 | 886  | 1/29/2018  | 604 | 1088 |
| 2/26/2015  | 557 | 1166 | 2/26/2016  | 483 | 801  | 2/28/2017  | 451 | 657  | 2/27/2018  | 427 | 738  |
| 3/25/2015  | 398 | 817  | 3/25/2016  | 332 | 452  | 3/28/2017  | 404 | 661  | 3/28/2018  | 386 | 721  |

PGW Exhibit 1.

13. The Service Address has been served by PGW's gas meter # 1802104 since at least November 9, 2014. Tr. 40, PGW Exhibits 1 and 4.

14. On November 6, 2017, PGW tested the gas meter serving the Service Address for accuracy. Tr. 40, PGW Exhibit 4.

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<sup>1</sup> Degree Day – A unit measuring the extent to which the outdoor mean (average of maximum and minimum) daily dry-bulb temperature falls below (in the case of heating) or rises above (in the case of cooling) an assumed base. The base is normally taken as 65°F for heating and for cooling unless otherwise designated. One degree-day is counted for each degree of deficiency below (for heating) or excess over (for cooling) the assumed base, for each calendar day on which such deficiency or excess occurs. James H. Cawley and Norman Kennard, *Rate Case Handbook, A Guide to Utility Ratemaking before the Pennsylvania Public Utility Commission*, Glossary of Terms, Appendix Q (Pa. PUC 1983).

15. Gas meter # 1802104 tested accurate within the  $\pm 2\%$  margin of error allowed by the Commission's regulation at 52 Pa.Code § 59.22. Tr. 40, 61, PGW Exhibit 4.

16. As of the day of the hearing, Ms. Carey is not eligible for enrollment in PGW's CRP. Tr. 31, 58-59, PGW Exhibit 1.

17. During the period of November 25, 2014 to April 10, 2018, Ms. Carey made only 10 payments towards her account with PGW for the Service Address. Tr. 41, PGW Exhibit 1.

18. Ms. Carey's income consists of \$1,765.00 per month in Social Security Disability Insurance (SSDI) benefits. Tr. 17.

19. On May 11, 2017, Ms. Carey filed an informal complaint with the Commission's Bureau of Consumer Services (BCS) at BCS Case # 3525310 alleging her inability to pay her gas bills to PGW and requesting a payment arrangement. PGW Exhibit 3.

20. On May 17, 2017, BCS issued a decision at BCS Case # 3525310 establishing a payment arrangement on behalf of the Complainant upon finding that Ms. Carey was a Level 2 income customer. PGW Exhibit 3.

21. On July 19, 2017, Ms. Carey defaulted on the payment arrangement issued by the Commission's BCS. Tr. 35, PGW Exhibits 1 and 2.

22. Ms. Carey's income has not changed since May 11, 2017. Tr. 47-51, see also, Tr. 15 and PGW Exhibit 3.

23. The number of individuals in Ms. Carey's household has not changed since May 11, 2017. PGW Exhibit 3.

24. As of the day of the hearing, Ms. Carey's outstanding balance with PGW was \$10,163.08. Tr. 30, PGW Exhibit 3.

25. Ms. Carey's entire outstanding balance consists of non-CRP arrearages. Tr. 73-74.

### DISCUSSION

In her formal Complaint, Ms. Carey alleged that the Respondent is threatening to shut off her gas service, that she is unable to pay her gas bills to PGW, and that her bills from PGW are abnormally high. As relief, Ms. Carey requested that the Commission review her account with PGW and establish a payment arrangement on her behalf.

As the proponent of a rule or order, the Complainant in this proceeding bears the burden of proof pursuant to Section 332(a) of the Public Utility Code (Code), 66 Pa.C.S.A. § 332(a). In *Waldron v. Philadelphia Electric Company*, 54 Pa. PUC 98 (1980) (*Waldron*), the Commission explained the process for initially meeting the burden of proof. A complainant must first establish a *prima facie* case, showing that the utility breached some duty owed to the complainant, in that the utility violated the Public Utility Code or a regulation or order of the Commission. 66 Pa.C.S.A. § 701. If the complainant establishes a *prima facie* case, then the burden of going forward with the evidence, but not the ultimate burden of proof, shifts to the utility to rebut the *prima facie* case with evidence which is at least co-equal. If the utility presents co-equal evidence, the burden of going forward shifts back to the complainant, to rebut the utility's case by a preponderance of the evidence. *Poorbaugh v. West Penn Power Company*, 1994 Pa. PUC LEXIS 95 (*Poorbaugh*). Preponderance of the evidence means that the party with the burden of proof has presented evidence that is more convincing than that presented by the other party. *Samuel J. Lansberry, Inc. v. Pa. Pub. Util. Comm'n*, 578 A.2d 600 (Pa.Cmwlth. 1990) *alloc. den.*, 529 Pa. 654, 602 A.2d 863 (1992). In addition, the Commission's decision must be supported by "substantial evidence," which consists of evidence that a reasonable mind might accept as adequate to support a conclusion. A mere "trace of

evidence or a suspicion of the existence of a fact” is insufficient. *Norfolk and Western Railway Co. v. Pa. Pub. Util. Comm’n*, 489 Pa. 109, 413 A.2d 1037 (1980).

Upon the presentation by the complainant of evidence sufficient to initially satisfy the burden of proof, the burden of going forward with the evidence to rebut the evidence of the complainant shifts to the respondent. If the evidence presented by the respondent is of co-equal weight, the complainant has not satisfied her burden of proof. The complainant would be required to provide additional evidence to rebut the evidence of the respondent. *Burleson v. Pa. Pub. Util. Comm’n*, 443 A.2d 1373 (Pa.Cmwlth. 1982), *aff’d*, 501 Pa. 433, 461 A.2d 1234 (1983).

While the burden of persuasion may shift back and forth during a proceeding, the burden of proof never shifts. The burden of proof always remains on the party seeking affirmative relief from the Commission. *Milkie v. Pa. Pub. Util. Comm’n*, 768 A.2d 1217 (Pa. Cmwlth. 2001).

#### **a) High Billing Dispute**

The burden of proof for high billing complaints has been explained in *Waldron v. Philadelphia Electric Company*, 54 Pa. PUC 98 (1980), and its progeny. In *Waldron*, the Commission adopted the Michigan Public Service Commission's (PSC's) policy announced in *Hallifax v. O & A Electric Co-Op*, Case No. U-5825, May 1979, which stated that, while the accuracy of the meter is an important factor in resolving billing disputes, it is not the sole criterion. The Commission stated that it will also consider the following factors: the billing history of the complainant; any change in the number of occupants residing at the household; the potential for energy utilization; and any other relevant facts or circumstances that are brought to light during the complaint proceeding. *Waldron* at 100.

Consistent with the Commission's holding in *Charisse Bennett v. Peoples Natural Gas Co.*, Docket No. C-2009-2122979 (Order entered October 13, 2010), the *Waldron* Rule allows a complainant to establish a *prima facie* case in a high bill complaint by showing that the

disputed bill is abnormally high when compared to prior usage patterns and his or her pattern of usage has not changed or by providing other relevant evidence showing that the disputed bill is unreasonably high. In evaluating a high bill complaint, the Commission may consider such evidence as "the billing history of the account, any change in usage patterns (such as a change in the number of occupants residing in the household or potential energy utilization), and any other relevant facts or circumstances that come to light during the proceeding." *Id.* at 6 (emphasis added); *see also Nehemiah B. Thomas v. PECO Energy Company*, Docket No. C-2010-2187197 (Opinion and Order entered November 15, 2011).

After carefully considering all the evidence collected in this matter, I find that the Complainant has failed to carry her burden of proving that her gas bills are incorrect or abnormally high.

During the period from November 25, 2014 to October 13, 2016, Ms. Carey was enrolled in PGW's CRP program. Tr. 32, 58, PGW Exhibit 1. During her participation in the program, Ms. Carey's gas bills were not based on her gas usage but were calculated as a percentage of her income. Tr. 31, 32, *see also* PGW Exhibit 2. Due to her participation in PGW's CRP program, Ms. Carey's gas bill was \$45.00 invariably every month during the period of November 25, 2014 to October 13, 2016. PGW Exhibit 1.

On October 13, 2016, Ms. Carey was removed from PGW's CRP program due to her failure to recertify. Tr. 58. At the time of her removal from CRP on October 13, 2016, Ms. Carey's pre-program balance of \$3,935.38, which had been set aside during her participation in the program, was returned to her account. Tr. 32-33, PGW Exhibit 1. After her removal from CRP, Ms. Carey's gas bills were calculated based on her gas usage. Tr. 33, PGW Exhibit 1. More specifically, after October 13, 2016, Ms. Carey's bills for gas service at the Service Address during the colder months were as follows:

| Date       | CCF usage | Heating DDs | Billed amount |
|------------|-----------|-------------|---------------|
| 11/23/2016 | 356       | 416         | \$503.81      |
| 12/27/2016 | 499       | 729         | \$659.69      |
| 1/27/2017  | 569       | 886         | \$818.46      |
| 2/28/2017  | 451       | 657         | \$678.69      |
| 3/28/2017  | 404       | 661         | \$565.13      |
| 11/24/2017 | 296       | 423         | \$403.76      |
| 12/27/2017 | 474       | 819         | \$674.52      |
| 1/29/2018  | 604       | 1088        | \$826.72      |
| 2/27/2018  | 427       | 738         | \$687.04      |
| 3/28/2018  | 386       | 721         | \$507.46      |

PGW Exhibit 1. Although some of these bills are undoubtedly large for a household of one (\$818.46 in January of 2017, and \$826.72 in January of 2018), Ms. Carey’s gas usage after her removal from CRP is comparable with her usage before her removal from the program:

| Date       | CCF | HDDs | Date       | CCF | HDDs | Date                          | CCF | HDDs | Date       | CCF | HDDs |
|------------|-----|------|------------|-----|------|-------------------------------|-----|------|------------|-----|------|
| 11/25/2014 | 277 | 527  | 11/24/2015 | 233 | 331  | <b>11/23/2016<sup>2</sup></b> | 356 | 416  | 11/24/2017 | 296 | 423  |
| 12/26/2014 | 436 | 788  | 12/23/2015 | 324 | 451  | 12/27/2016                    | 499 | 729  | 12/27/2017 | 474 | 819  |
| 1/27/2015  | 516 | 1069 | 1/27/2016  | 512 | 927  | 1/27/2017                     | 569 | 886  | 1/29/2018  | 604 | 1088 |
| 2/26/2015  | 557 | 1166 | 2/26/2016  | 483 | 801  | 2/28/2017                     | 451 | 657  | 2/27/2018  | 427 | 738  |
| 3/25/2015  | 398 | 817  | 3/25/2016  | 332 | 452  | 3/28/2017                     | 404 | 661  | 3/28/2018  | 386 | 721  |

PGW Exhibit 1.

In addition, although occupied only by Ms. Carey, the Service Address is a 1,760 square foot, two-story, single-family house with three bedrooms and a basement. Tr. 25, 63-64, PGW Exhibit 5. During her testimony, Ms. Carey<sup>3</sup> described it as an old house, with poor insulation and in need of repairs. Tr. 17-18, 24-25, 67.

<sup>2</sup> Ms. Carey was removed from CRP on October 13, 2016. Tr. 58.

<sup>3</sup> The Complainant is also the ratepayer of record for gas service at a residential property on Kamath Street, Philadelphia, PA, which she co-owns with her son. Tr. 23-24.

Furthermore, on November 6, 2017, PGW tested for accuracy gas meter # 1802104, which had served the Service Address since at least November 9, 2014. Tr. 40, PGW Exhibits 1 and 4. Gas meter # 1802104 tested accurate within the  $\pm 2\%$  margin of error allowed by the Commission's regulation at 52 Pa.Code § 59.22. Tr. 40, 61, PGW Exhibit 4.

Lastly, during the period November 25, 2014 to April 10, 2018, Ms. Carey made only 10 payments towards her account with PGW for the Service Address. Tr. 41, PGW Exhibit 1.

After considering Ms. Carey's payment history with PGW, her gas usage patterns, her participation in the CRP program, the condition of the Service Address, and the meter test accuracy results, I find Ms. Carey's gas bills from PGW are correct as rendered. The outstanding balance accumulated in her account with the Respondent is a result of her missed, partial and/or untimely payments to PGW. Consequently, Ms. Carey's claim of high or incorrect billing is denied.

#### **b) Payment Arrangement**

The Responsible Utility Customer Protection Act, 66 Pa.C.S. § 1401 *et seq.* (the Act or Chapter 14), applies to complaints alleging inability to pay and requesting a Commission-issued payment arrangement. This law provides strict guidelines that the Commission must follow in handling customer complaints. Section 1405 of the Public Utility Code regarding payment arrangements reads in pertinent part:

##### **(a) General rule. --**

The commission is authorized to investigate complaints regarding payment disputes between a public utility, applicants and customers. the commission is authorized to establish payment arrangements between a public utility, customers and applicants within the limits established by this chapter.

**(b) Length of payment arrangements. --**

The length of time for a customer to resolve an unpaid balance on an account that is subject to a payment arrangement that is investigated by the commission and is entered into by a public utility and a customer shall not extend beyond:

(1) Five years for customers with a gross monthly household income level not exceeding 150% of the Federal poverty level.

(2) Three years for customers with a gross monthly household income level exceeding 150% and not more than 250% of the Federal poverty level.

(3) One year for customers with a gross monthly household income level exceeding 250% of the Federal poverty level and not more than 300% of the Federal poverty level.

(4) Six months for customers with a gross monthly household income level exceeding 300% of the Federal poverty level.

\* \* \*

**(d) Number of payment arrangements** – Absent *a change in income*, the Commission shall not establish or order a public utility to establish a second or subsequent payment agreement if a customer has defaulted on a previous payment agreement. A public utility may, at its discretion, enter into a second or subsequent payment agreement with a customer.

**(e) Extension of payment arrangements.** — If the customer defaults on a payment arrangements established under subsections (a) and (b) as a result of *a significant change in circumstance*, the commission may reinstate the payment arrangement and extend the remaining term for an initial period of six months. The initial extension period may be extended for an additional six months for good cause shown.

66 Pa.C.S. §§ 1405(a), (b), (d) and (e) (emphasis added). In addition, "household income" is defined in section 1403 of the Public Utility Code as "[t]he combined gross income of all adults in a residential household who benefit from the public service." 66 Pa.C.S. § 1403. Furthermore, section 1403 defines "change in income" as a decrease in household income of 20% or more if the customer's household income level exceeds 200% of the Federal poverty

level or a decrease in household income of 10% or more if the customer's household income level is 200% or less of the Federal poverty level. 66 Pa.C.S. § 1403.

Lastly, section 1403 defines a “*significant change in circumstance*” in customers with household income less than 300% of the Federal poverty level as: (1) the onset of a chronic or acute illness resulting in a significant loss in the customer’s household income; (2) catastrophic damage to the customer’s residence resulting in a significant net cost to the customer’s household; (3) loss of the customer’s residence; or (4) increase in the customer’s number of dependents in the household.

On May 11, 2017, Ms. Carey filed an informal complaint with the Commission’s BCS at BCS Case # 3525310 alleging her inability to pay her gas bills to PGW and requesting a payment arrangement. PGW Exhibit 3. On May 17, 2017, BCS issued a decision at BCS Case # 3525310 establishing a payment arrangement on behalf of the Complainant upon finding that Ms. Carey was a Level 2 income customer. PGW Exhibit 3. On July 19, 2017, Ms. Carey defaulted on the payment arrangement issued by the Commission’s BCS. Tr. 35, PGW Exhibits 1 and 2.

Ms. Carey’s income and the number of individuals in her household have not changed since May 11, 2017. Tr. 47-51, see also Tr. 15 and PGW Exhibit 3. Ms. Carey’s outstanding balance with PGW is \$10,163.08. Tr. 30, PGW Exhibit 3. Her outstanding balance consists entirely of non-CRP arrearages. Tr. 73-74. As of the day of the hearing, Ms. Carey was not eligible for enrollment in PGW’s CRP. Tr. 31, 58-59, PGW Exhibit 1.

After carefully reviewing the record in this matter, I find that the Complainant has failed to carry her burden of proving that she has experienced a decrease in income that satisfies the definition of a “change in income” pursuant to 66 Pa.C.S. §§ 1403 and 1405(d). Consequently, the Commission lacks the authority to issue a subsequent payment arrangement for the Complainant.

Additionally, Ms. Carey testified at the hearing that she has been suffering from a chronic medical condition for the last two and a half years. Tr. 20. However, she testified that her income did not change because of the onset of the medical condition in question. Tr. 51. Therefore, I find that the Complainant has not experienced a significant change in circumstance, and does not qualify for a reinstatement of the Commission-issued payment arrangement and extension of the remaining term for an initial period of six months.

For the reasons stated above, Ms. Carey's present Complaint against PGW is dismissed in its entirety.

### CONCLUSIONS OF LAW

1. The Commission has jurisdiction over the parties to and the subject matter of this proceeding. 66 Pa.C.S. § 701.

2. The party filing the Complaint bears the burden of proving that she is entitled to relief from the Commission. 66 Pa.C.S. § 332(a).

3. "Burden of proof" means a duty to establish one's case by a preponderance of the evidence, which requires that the evidence be more convincing by even the smallest degree, than the evidence presented by the other side. *Se-Ling Hosiery, Inc. v. Margulies*, 364 Pa. 45, 70 A.2d 854 (1950).

4. In establishing whether a "high bill" has been demonstrated, while the accuracy of the meter is an important factor in resolving billing disputes, the Commission will also consider the billing history of the Complainant; any change in the number of occupants residing at the household; the potential for energy utilization; and any other relevant facts or circumstances that are brought to light during the complaint proceeding. *Waldron v. Philadelphia Electric Co.*, 54 Pa. PUC 98, 100 (1980).

5. The Responsible Utility Customer Protection Act, 66 Pa.C.S. § 1401 *et seq.*, applies to this proceeding.

6. Absent a change in income, the commission shall not establish or order a public utility to establish a second or subsequent payment agreement if a customer has defaulted on a previous payment agreement. 66 Pa.C.S. § 1405(d).

7. If the customer defaults on a Commission-issued payment arrangement as a result of a significant change in circumstance, the Commission may reinstate the payment arrangement and extend the remaining term for an initial period of six months. The initial extension period may be extended for an additional six months for good cause shown. 66 Pa.C.S. § 1405(e).

8. Change in income is defined as a decrease in household income of 20% or more if the customer's household income level exceeds 200% of the Federal poverty level or a decrease in household income of 10% or more if the customer's household income level is 200% or less of the Federal poverty level. 66 Pa.C.S. § 1403.

9. Household income is defined as the combined gross income of all adults in a residential household who benefit from the public service. 66 Pa.C.S. § 1403.

10. Significant change in circumstance in customers with household income less than 300% of the Federal poverty level is defined as: (1) the onset of a chronic or acute illness resulting in a significant loss in the customer's household income; (2) catastrophic damage to the customer's residence resulting in a significant net cost to the customer's household; (3) loss of the customer's residence; or (4) increase in the customer's number of dependents in the household. 66 Pa.C.S. § 1403.

ORDER

THEREFORE,

IT IS ORDERED:

1. That the Formal Complaint filed by Marilyn Carey against Philadelphia Gas Works at Docket No. C-2017-2633794 is dismissed in its entirety.
2. That the Secretary mark this docket closed.

Date: June 30, 2018

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/s/  
Eranda Vero  
Administrative Law Judge