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File #: 171942

December 20, 2018

VIA ELECTRONIC FILING

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor North
P.O. Box 3265
Harrisburg, PA 17105-3265

**Re: Pennsylvania Public Utility Commission, et al. v. Columbia Gas of Pennsylvania, Inc.
Docket Nos. R-2018-2647577, etc.**

Dear Secretary Chiavetta:

Enclosed please find the Petition for Reconsideration of Columbia Gas of Pennsylvania in the above-referenced proceeding. Copies will be provided as indicated on the Certificate of Service.

Respectfully submitted,

Michael W. Hassell

MWH/cls
Enclosure

cc: Honorable Jeffrey Watson
Certificate of Service

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission	:	Docket No. R-2018-2647577
Office of Consumer Advocate	:	C-2018-3000582
Office of Small Business Advocate	:	C-2018-3000773
Patricia Southorn	:	C-2018-3000779
The Pennsylvania State University	:	C-2018-3001034
Columbia Industrial Intervenors	:	C-2018-3001047
G. Blair Bauer	:	C-2018-3001319
Philip L. Bloch	:	C-2018-3001634
Robin A. Harrison	:	C-2018-3002595
	:	
v.	:	
	:	
Columbia Gas of Pennsylvania, Inc.	:	

**PETITION OF COLUMBIA GAS OF PENNSYLVANIA, INC.
FOR RECONSIDERATION OF
THE PENNSYLVANIA PUBLIC UTILITY COMMISSION’S
ORDER ENTERED ON DECEMBER 6, 2018**

Columbia Gas of Pennsylvania, Inc. (“Columbia” or the “Company”), pursuant to Section 703(g) of the Public Utility Code, 66 Pa.C.S. § 703(g) and Section 5.572 of the Pennsylvania Public Utility Commission’s (“Commission”) regulations, 52 Pa. Code § 5.572, hereby requests reconsideration of the Order entered on December 6, 2018 (“Order”) in the above-captioned proceeding. In the Order, the Commission directed Columbia to provide “on bill” billing for all entities that provide non-commodity products and services or discontinue its current “on bill” billing policies.

Reconsideration of the Order is appropriate because the Order wrongly concluded that Columbia’s existing practice is discriminatory and, in doing so, failed to consider several important reasons why Columbia should be permitted to continue

providing “on bill” billing to two unaffiliated entities without being required to open its bill for other entities.

I. BACKGROUND

1. Columbia is engaged in the business of selling and distributing natural gas to retail customers within the Commonwealth, and is therefore a “public utility” within the meaning of Section 102 of the Public Utility Code, 66 Pa. C.S. § 102, subject to the regulatory jurisdiction of the Commission.

2. On March 16, 2018, Columbia filed a request for a revenue increase of approximately \$46.9 million annually based upon a pro forma fully projected future test year ending December 31, 2019 (“2018 Base Rate Filing”). The 2018 Base Rate Filing was Docket at R-2018-2647577 and assigned to Administrative Law Judge Jeffrey A. Watson (the “ALJ”).

3. Formal Complaints were filed by the Office of Consumer Advocate (“OCA”), Office of Small Business Advocate (“OSBA”), Columbia Industrial Intervenors (“CII”), The Pennsylvania State University (“PSU”), Patricia Southorn, G. Blair Bauer, Philip L. Bloch, and Robin A. Harrison. Petitions to Intervene were filed by Shipley Choice, LLC, Dominion Energy Solutions, Inc. and Interstate Gas Supply, Inc. (collectively, the “NGS Parties”), Direct Energy Business, LLC, Direct Energy Services, LLC & Direct Energy Business Marketing, LLC (collectively, “Direct Energy”), Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania (“CAUSE-PA”), and Community Action Association of Pennsylvania (“CAAP”). The Commission’s Bureau of Investigation & Enforcement (“I&E”) filed a Notice of Appearance.

4. Throughout the proceeding and in accordance with the litigation schedule, various parties conducted discovery and filed direct, rebuttal, and surrebuttal testimony.

5. The parties held numerous settlement discussions which ultimately led to a settlement of all issues in this case with one exception. The sole issue reserved for litigation was whether Columbia will be permitted to continue to include on its bills a separate line item charge for non-commodity services elected by customers and offered by unaffiliated entities who are not Natural Gas Suppliers (“NGSs”), without being required to allow NGSs access to Columbia’s bills to charge customers for other non-commodity products and services that may be offered by NGSs.

6. On August 16, 2018, Columbia, the NGS Parties, Direct Energy, and the OCA filed Main Briefs concerning the issue reserved for litigation.

7. On August 31, 2018, Columbia, the NGS Parties, and the OCA filed Reply Briefs.

8. Also on August 31, 2018, the parties filed a Joint Petition for Partial Settlement.

9. On September 28, 2018, the ALJ issued a Recommended Decision (“RD”) recommending that the Joint Petition for Partial Settlement be approved without modification and that the NGS Parties’ request to require Columbia to bill for non-commodity products offered by the NGSs be denied. With respect to the litigated issue, the RD concluded that Columbia’s decision to limit the entities who may include charges for optional non-commodity products on Columbia’s bill is not discriminatory because the NGSs are not utility customers, and Columbia is not favoring one NGS over another. RD, pp. 117-18.

10. On October 15, 2018, the NGS Parties filed Exceptions to the RD.

11. On October 25, 2018, Columbia and the OCA filed Reply Exceptions.

12. In the December 6, 2018 Order, the Commission granted, in part, and denied, in part, the NGS Parties' Exceptions. The Order adopted the RD's recommendation to approve the Joint Petition for Partial Settlement without modification but did not adopt the RD's recommendation with respect to the litigated issue. Instead, the Order concluded that Columbia's existing practice is discriminatory pursuant to Sections 1502 and 2204 of the Public Utility Code and directed Columbia to provide on bill billing for all entities that offer non-commodity products and services or discontinue its on bill billing practice. Order, pp. 50-51.

II. THE LEGAL STANDARD FOR GRANTING RECONSIDERATION HAS BEEN MET.

13. The Commission's standards for granting reconsideration following final orders are set forth in *Duick v. Pennsylvania Gas and Water Co.*, 56 Pa. P.U.C. 553, 559 (1982):

A petition for reconsideration, under the provisions of 66 Pa.C.S. § 703(g), may properly raise any matters designed to convince the Commission that it should exercise its discretion under this code section to rescind or amend a prior order in whole or in part. In this regard we agree with the Court in the Pennsylvania Railroad Company case, wherein it was said that "[p]arties ..., cannot be permitted by a second motion to review and reconsider, to raise the same questions which were specifically considered and decided against them..." What we expect to see raised in such petitions are new and novel arguments, not previously heard, or considerations which appear to have been overlooked or not addressed by the Commission.

The Commission has cautioned that the operative language of the *Duick* standard focuses on the deliberations of the Commission, not the arguments of the parties. See *Pa. PUC v PPL Electric Utilities Corporation*, Docket No. R-2012-2290597 (Opinion and Order entered May 22, 2014).

14. The *Duick* standard for reconsideration has been met in this case because the Commission (1) overlooked certain facts that would have resulted in a conclusion that Columbia's existing practice is not discriminatory and (2) did not address several reasons why Columbia should not be required to bill for the non-commodity products offered by NGSs.

III. ARGUMENT FOR RECONSIDERATION

A. THE COMMISSION OVERLOOKED FACTS DEMONSTRATING THAT COLUMBIA'S EXISTING PRACTICE OF PROVIDING ON BILL BILLING TO TWO UNAFFILIATED, NON-NGS ENTITIES IS NOT UNREASONABLY DISCRIMINATORY.

1. The Commission overlooked the fact that the entities involved are not customers or ratepayers.

15. In concluding that Columbia's existing practice is discriminatory, the Commission focuses on certain facts while overlooking other key facts as to why Columbia's existing practice is not discriminatory. The Order points to Columbia's preexisting relationship with its former affiliates and the business advantage that may result from having charges appear on Columbia's bill. Order, pp. 49-50. However, the Order overlooks facts that exclude Columbia's practice of on bill billing for the non-commodity products offered by two unaffiliated entities from the type of treatment addressed by Section 1502 of the Public Utility Code, 66 Pa. C.S. § 1502. The two unaffiliated entities are not regulated, and the products and services being billed are not regulated utility service. Most importantly, the Commission fails to recognize that the complaining parties, NGSs, are not customers or ratepayers. As such, 66 Pa. C.S. § 1502 does not apply here.

16. In overlooking this important fact, the Order misapplies the Commonwealth Court's decision in *PPL Electric Utilities Corp. v. Pa. PUC*, 912 A.2d 386 (Cmwlth. Ct. 2006). In *PPL*, the Commonwealth Court explained:

Complainants complain that PPL has discriminated against them because their conduct allegedly impacted Complainants' ability to compete. Complainants, however, were not customers or ratepayers. They provided consulting services to industrial customers. Therefore, this Court does not agree with the Commission that this is the type of discrimination or preferential treatment addressed by Section 1502.

PPL Electric Utilities Corp., 912 A.2d at 409 (emphasis added). Here, the NGSs are not customers or ratepayers of Columbia. By concluding that Section 1502 applies to the non-commodity services offered by unaffiliated entities who are not customers or ratepayers, the Order misapplied the Commonwealth Court's decision in *PPL*. As in *PPL*, the type of treatment at issue here, i.e. the treatment of a non-customer or non-ratepayer, is not the type of treatment that is addressed by Section 1502. Therefore, the Order improperly rejected the RD's conclusion that Columbia's practice is not discriminatory pursuant to Section 1502 because the party alleging discrimination is not a customer or ratepayer. RD, pp. 117-18.

17. In support of the conclusion that Columbia's existing practice is discriminatory, the Order cites *Aronson v. Pa. PUC*, 740 A.2d 1208 (Cmwlth. Ct. 1999). Order, p. 45. The Order fails to consider that *Aronson* is distinguishable from the present case in two significant ways. First, the complainant in *Aronson* was a customer and ratepayer of the utility, not a NGS or other third party seeking to include charges on the utility bill. The Order does not address this important distinction, which renders the

holding in *Aronson* inapplicable to the present case. Second, *Aronson* involved the reasonableness of a utility's billing practices for natural gas service provided to customers, which included the information to be included on customer billing statements and late payment charges to be imposed. *Aronson*, 740 A.2d 1208. The issue before the Commission here is not about the type of information that is or will be on the billing statement, the issue here is whether a utility is required to offer "on bill" billing for non-commodity products and services to NGSs if it does so for two unaffiliated, non-NGS entities. This factual distinction renders *Aronson* inapplicable to the case at hand.

18. Based on the foregoing, Columbia respectfully requests that the Commission grant reconsideration, rescind the Order as it relates to the litigated issue, and adopt the RD of ALJ Watson.

2. The Commission overlooked the fact that Columbia is not treating Natural Gas Suppliers differently.

19. The Order incorrectly concludes that Columbia's existing practice is discriminatory pursuant to Section 2203(4) of the Public Utility Code, 66 Pa. C.S. § 2203(4). Order, pp. 47-48. Section 2203(4) provides:

(4) Consistent with the provisions of section 2204, the commission shall require that a natural gas distribution company that owns or operates jurisdictional distribution facilities shall provide distribution service to all retail gas customers in its service territory and to all natural gas suppliers, affiliated or nonaffiliated, on nondiscriminatory rates, terms of access and other conditions.

The Commission fails to consider that the two unaffiliated entities for which Columbia currently provides on bill billing are not NGSs, and Columbia does not provide on bill

billing to any NGS. Columbia is not treating one NGS differently than another NGS. Section 2203(4) concerns treatment as between NGSs. Therefore, Columbia's existing practice is not discriminatory pursuant to Section 2203(4).

20. Moreover, Section 2203(4) concerns natural gas distribution service. It does not concern the non-commodity products at issue here. The two unaffiliated entities for which Columbia currently provides on bill billing do not offer natural gas supply service.

21. For these reasons, Section 2203(4) is inapplicable to the billing of non-commodity products for two unaffiliated, non-NGS entities. Therefore, Columbia respectfully requests that the Commission grant reconsideration, rescind the Order as it relates to the litigated issue, and adopt the RD of ALJ Watson.

B. THE COMMISSION FAILED TO CONSIDER SEVERAL REASONS WHY COLUMBIA SHOULD NOT BE REQUIRED TO PROVIDE ON BILL BILLING TO ALL ENTITIES OFFERING NON-COMMODITY PRODUCTS AND SERVICES.

1. Requiring Columbia to provide on bill billing for all entities offering non-commodity products and services is not in the best interest of customers.

22. Based on the Commission's conclusion that Columbia's existing on bill billing practice is unreasonably discriminatory, the Order directs that Columbia "either provide such a service to all entities that provide such non-basic services or must discontinue the 'on bill' billing policy." Order, p. 50. This directive suggests that the Commission has the understanding that Columbia has sole discretion over whether to continue or discontinue this billing service to the two entities; however, Columbia notes

that contractual commitments prevent Columbia from terminating these two contracts immediately, and thus the Company does not have such discretion at this time.

23. Additionally, there are several practical problems with opening the utility bill to all entities who offer non-commodity products that the Order does not consider.

24. Columbia's existing contracts define the exact non-commodity products that can be included on the bill. If Columbia opens its bill to all entities that provide non-basic service, the number and type of potential non-commodity products that could be included on the utility bill is essentially limitless. For example, the NGSs sought to include on Columbia's bills products and services, such as loyalty rewards and products bundled with home protection, that are unrelated to gas service. These products go well beyond the scope of what Columbia currently bills for and are not charges that a customer would reasonably expect to see on their utility bill. As explained by Columbia, including a potentially endless variety of charges for non-commodity products on the bill would unnecessarily complicate the utility bill and could lead to significant customer confusion when interpreting their bill, especially when it comes to products that are unrelated to natural gas service (Columbia Statement No. 18-R, pp. 6-8; Columbia M.B., pp. 15-19). The Commission did not consider these issues in deciding to adopt the NGSs' proposal.

25. Including these charges on Columbia's bill would require costly system updates and training. Columbia's current billing system is limited to a very specific subset of services relative to the services that were proposed by the NGS Parties. Several additional processes would need to be developed for Columbia to address issues that it

would expect to face by allowing NGSs to include billing for non-commodity products and services on Columbia's bills, including training to educate employees on the products, development of a hierarchy to determine the impact of non-payment of services, and development of a customer complaint process. There is no consensus on who would be responsible for these costs and whether customers would have to pay for the costs to install the necessary programming and information technology changes. In addition, it is unclear how the charges for such non-commodity services would be determined. As explained by Columbia, the potential for an unregulated charge determined by the unregulated, third-party entity providing the service could lead to unexpected and unpredictable increases in the utility bill (Columbia Statement No. 18-R, p. 7; Columbia M.B., pp. 17-19). The Commission did not consider these issues related to implementation costs and the determination of service charges in deciding to adopt the NGSs' proposal.

26. Finally, there appear to be no limitations on the entities that can include charges for non-basic service on Columbia's bills. It is unclear whether the requirement is limited to only NGSs or whether other non-NGS third parties could seek to have charges included on Columbia's bill. There is also no indication that the Commission considered either the cost or potential confusion from multiple requests to include charges on a customer's bill (Columbia Statement No. 18-R, pp. 7-8; Columbia M.B., pp. 17-19).

27. The Commission's directive is problematic because it failed to consider all of these reasons why Columbia should not be directed to open its bill to all entities that provide non-commodity products and services. Therefore, Columbia respectfully

requests that the Commission reconsider its Order based on these issues and revise its directive requiring Columbia to provide on bill billing for all entities that offer for non-commodity products and services or discontinue its on bill billing practice.

2. Including charges for non-commodity products offered by NGSs on the utility bill raises important consumer protection concerns that have not been addressed by the Commission.

28. Including on the utility bill charges for non-commodity products offered by NGSs could lead to the non-commodity products being marketed together or “bundled” with natural gas supply service. Such a practice could lead to potential confusion and adverse consequences for customers. By marketing these non-basic products in connection with the commodity service, the gas supply product and non-commodity service could be viewed as a package deal from the customer’s perspective, leading customers to elect this option even when it is not in their best interest. The Commission has previously expressed its concern with linking non-commodity products with the sale of gas supply. *See, e.g., 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 (limitations on low-income customer shopping were warranted for several reasons, including NGSs marketing “other benefits,” such as gift cards and energy audits, along with supply service to customers as an incentive to elect their natural gas supply service) (Order entered October 27, 2016) at pp. 35, 53. However, the Commission did not address this issue in its Order.

29. Columbia notes that this concern does not apply to Columbia's existing billing contracts with the two non-NGS entities because, unlike the NGSs, Columbia does not sell or market the non-commodity services being offered. Rather, the non-commodity products are marketed directly by the third party entities that offer the products, without any involvement from Columbia. Therefore, there is no potential of the non-commodity product being linked with gas supply or distribution service.

30. Based on the foregoing, Columbia respectfully requests that the Commission reconsider its Order in light of these issues and revise its directive requiring Columbia to provide on bill billing for all entities that offer non-commodity products and services or discontinue its on bill billing practice.

3. The Order fails to address that requiring Columbia to include on its bill non-commodity products offered by NGSs would violate the Company's First Amendment Rights.

31. Requiring Columbia to bill for the non-commodity products offered by NGSs would result in Columbia being required to associate itself with products and services that are contrary to its interests in violation of Columbia's First Amendment rights. *See Mid-Atlantic Power Supply Association v. PECO Energy Company*, Docket No. P-00981615, 1999 Pa. PUC LEXIS 23 *97 (Recommended Decision, January 11, 1999; Order entered May 19, 1999) (utility could not be ordered to include in its billing envelopes a letter supporting EGSs because it would require the utility to "endorse EGSs and vouch for their reliability, competence, truthfulness and good reputation," which would violate the utility's First Amendment rights). If Columbia were to include charges for the NGS Parties' non-commodity products and services on its bills, Columbia could

be viewed as endorsing these items. The Order recognizes the potential that items appearing on the utility bill could be recognized as the utility's endorsement of those products. Order, p. 49. However, the Order overlooks that requiring Columbia to associate itself with these products violates the Company's First Amendment rights.

32. Several of the products and services offered by the NGS Parties are in no way related to natural gas service, e.g. products bundled with loyalty rewards and products bundled with home protection. Certain of these services, such as distributed solar energy, are in direct competition with services provided by Columbia. There are no criteria with respect to the non-commodity products or services that NGSs could demand to be included on Columbia's bill, which increases concerns about implicit endorsement of products.

33. The Order failed to address that Columbia cannot be directed to include on its bill charges for the products and services offered by NGSs because such a mandate would violate Columbia's First Amendment rights. Therefore, Columbia respectfully requests that the Commission reconsider its Order and revise its directive requiring Columbia to provide on bill billing for all entities that offer for non-commodity products and services or discontinue its on bill billing practice.

4. On bill billing for non-commodity products and services offered by NGSs and other third parties is an issue of industry-wide importance.

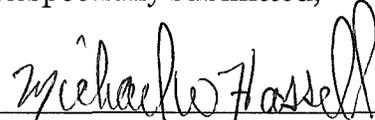
34. The Order fails to consider that a rate case is not the proper proceeding to establish far-reaching policy changes such as the one involved here. Requiring utilities to open their bills to all entities that offer unregulated non-commodity products and

services could affect stakeholders that are not involved in this rate proceeding. For this reason, the Order has the potential to impact Pennsylvania utilities and customers generally, not just Columbia and its customers. The Commission has previously addressed such issues of industry-wide importance in proceedings where all stakeholders have an opportunity to participate. *See Investigation of Pennsylvania's Retail Electricity Market: Joint Electric Distribution Company – Electric Generation Supplier Bill*, Docket No. M-2014-2401345 (Order entered May 23, 2014) at pp. 28 (rejecting request to allow electric generation suppliers to include marketing materials as bill inserts and encouraging suppliers to do their own outreach). A generic proceeding where all stakeholders are given an opportunity to vet potential issues is the appropriate forum to address such broad policy considerations.

35. The Commission did not take into account the important and far-reaching policy implications of its Order. Therefore, Columbia respectfully requests the Commission reconsider its Order and revise its directive requiring Columbia to provide on bill billing for all entities that offer for non-commodity products and services or discontinue its on bill billing practice.

WHEREFORE, for the foregoing reasons, Columbia Gas of Pennsylvania, Inc. respectfully requests that the Pennsylvania Public Utility Commission reconsider its decision directing Columbia to provide on bill billing for all entities that offer for non-commodity products and services or discontinue its on bill billing practice.

Respectfully submitted,



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Date: December 20, 2018

Attorneys for Columbia Gas of Pennsylvania, Inc.

VERIFICATION

I, Andrew S. Tubbs, being the Vice President, External & Customer Affairs for Columbia Gas of Pennsylvania, Inc., hereby state that the facts above set forth are true and correct to the best of my knowledge, information and belief and that I expect to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa.C.S. § 4904 relating to unsworn falsification to authorities.

Date: 12/20/18

A handwritten signature in black ink, appearing to read 'A. S. Tubbs', written over a horizontal line.

Andrew S. Tubbs

**CERTIFICATE OF SERVICE
(Docket No. R-2018-2647577)**

I hereby certify that a true and correct copy of the foregoing has been served upon the following persons, in the manner indicated, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

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Date: December 20, 2018



Michael W. Hassell