



COMMUNITY LEGAL SERVICES
OF PHILADELPHIA

December 9, 2019

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

**Re: 2019 Amendments to Policy Statements on Customer Assistance Programs 52 Pa.
Code §§ 69.261-69.267, Docket No. M-2019-3012599**

*Joint Answer of the Low Income Advocates to the Petition of the Energy Association of
Pennsylvania for Reconsideration and Clarification of Final Policy Statement Order
Entered on November 5, 2019*

Dear Secretary Chiavetta:

Pursuant to the Commission Order entered November 25, 2019, enclosed please find the Joint Answer of the Tenant Union Representative Network, Action Alliance of Senior Citizens of Greater Philadelphia, and the Coalition for Affordable Utility Service and Energy Efficiency in Pennsylvania (collectively, "Low Income Advocates") to the Petition of the Energy Association of Pennsylvania for Reconsideration and/or Clarification. This Answer is being filed at the above-referenced docket, and will be served as noted in the attached Certificate of Service.

Should you have any questions or concerns, please do not hesitate to contact me at jprice@clsphila.org or (215) 981-3756.

Respectfully Submitted,

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Enclosure

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BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

2019 Amendments to Policy Statements on Customer Assistance Programs 52 Pa. Code §§ 69.261-69.267	: : : : :	Docket No. M-2019-3012599
Energy Affordability for Low-Income Customers in Pennsylvania	: : : :	Docket No. M-2017-2587711
Review of Universal Service and Energy Conservation Programs	: : :	Docket No. M-2017-2596907

**JOINT ANSWER OF THE TENANT UNION REPRESENTATIVE NETWORK,
ACTION ALLIANCE OF SENIOR CITIZENS OF GREATER PHILADELPHIA, AND
THE COALITION FOR AFFORDABLE UTILITY SERVICES AND ENERGY
EFFICIENCY IN PENNSYLVANIA TO THE PETITION OF THE ENERGY
ASSOCIATION OF PENNSYLVANIA FOR RECONSIDERATION AND
CLARIFICATION OF FINAL POLICY STATEMENT ORDER ENTERED ON
NOVEMBER 5, 2019**

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I. INTRODUCTION

Pursuant to 52 Pa. Code §§ 5.61 and 5.572(e), the Tenant Union Representative Network (TURN) and Action Alliance of Senior Citizens of Greater Philadelphia (Action Alliance), together with the Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania (CAUSE-PA) (collectively referred to herein as the Low Income Advocates) hereby file the following Answer to the Petition of Energy Association of Pennsylvania (EAP) for Reconsideration and Clarification of the Final Policy Statement Order Entered on November 5, 2019 (EAP Petition or Petition for Reconsideration).

In its Answer, the Low Income Advocates aver that the EAP Petition misconstrues the Commission's Final Policy Statement Order (Order) issued on November 5, 2019. Rather than establishing binding norms or mandating compliance with the revised Customer Assistance Program (CAP) Policy Statement, as EAP claims, the Ordering Paragraphs for which EAP seeks reconsideration notify utilities of the need to submit *an informational filing* regarding the extent to which they intend to follow the revised CAP Policy Statement. The Public Utility Commission (Commission) has authority to require each utility to submit additional informational filings or supplements to their USECPs. The Commission derives its authority to require supplemental filings pursuant to the Electric and Natural Gas Customer Choice and Competition Acts (Competition Acts) and the Commission's Regulations at 52 Pa. Code §§ 54.71-54.78 and 52 Pa. Code §§ 62.1-62.8. It is under this authority that the Commission can compel the filings required in the Ordering Paragraphs. For the reasons set forth more fully in this Answer, the Low Income Advocates respectfully request that the Commission deny EAP's Petition for Reconsideration.

Importantly, the EAP Petition does not address or challenge the substance of the amended CAP Policy Statement.¹ While the EAP requested a stay of Ordering Paragraphs six (6), seven (7), and eight (8), which impose a filing requirement on utilities, no party has requested a stay of the amended CAP Policy Statement. As such, the Low Income Advocates strongly urge the Commission to proceed with publication of the revised CAP Policy Statement so that it can become effective without delay.²

II. BACKGROUND

On November 5, 2019, the Commission issued its Final Policy Statement Order (Order), which amended its CAP Policy Statement to provide substantially improved affordability targets and program design features. As the Commission concluded therein, its current CAP Policy Statement is insufficient to provide an appropriate level of affordability, especially for the lowest income consumers whose household income is at or below 50% of the Federal Poverty Level (FPL).³ In its Order, the Commission strongly urged Electric Distribution Companies (EDCs) and Natural Gas Distribution Companies (NGDCs) to voluntarily incorporate the policies outlined in its revised CAP Policy Statement into their Universal Service and Energy Conservation Plans (USECP), though it did not mandate the utilities to make changes at this time, noting: “Any matters that cannot be resolved by *voluntary compliance* with Commission policy will be addressed in utility-specific proceedings.”⁴ The Commission ordered each EDC and NGDC to file an addendum

¹ *Id.*

² As discussed more fully in this Answer, it is the position of the Low Income Advocates that no compliance obligation is incurred by the CAP Policy Statement itself. Rather, compliance obligations arise within the context of individual utility USECPs, to the extent they incorporate the CAP Policy Statement explicitly or implicitly.

³ Order at 27-32 (concluding that the energy burden standards in the then-current CAP Policy Statement “do not reflect reasonable or affordable payments for many low-income customers.”)

⁴ Order at 2, 13, 100 (emphasis added).

to its current or pending USECP to explain how it intends to voluntarily comply with the policies outlined in its revised CAP Policy Statement.⁵

The EAP filed its Petition for Reconsideration on November 20, 2019. Along with its Petition for Reconsideration, the EAP filed a Petition to Stay Ordering Paragraphs Six, Seven, and Eight of the Order.⁶ Also on November 20, 2019, the Office of Consumer Advocate (OCA) filed a Petition for Reconsideration and/or Clarification of the Order.⁷ On November 21, 2019, the Low Income Advocates filed a Letter-Petition requesting an extension on the deadline for Answers to the Petitions for Reconsideration.

On November 25, 2019, the Commission issued an Order granting the Low Income Advocates' request, and extended the deadline for Answers to December 9, 2019. In that same Order, the Commission granted EAP and OCA's Petitions for Reconsideration and/or Clarification of the Final Policy Statement Order, pending consideration on the merits. In addition, the Commission granted EAP's Petition for a Stay of Ordering Paragraphs Six through Eight, without addressing the merits of EAP's assertions in its request for a stay, pending the Commission's disposition of the Petitions for Reconsideration.

In its Petition for Reconsideration, EAP challenges Ordering Paragraphs Six (6) through Eight (8) of the Order (Ordering Paragraphs), which EAP perceives as initiating a "hasty implementation" of the amended CAP Policy Statement.⁸ As explained below, the Low Income Advocates strongly disagree.

⁵ Order at 100.

⁶ The Low Income Advocates are separately filing a Letter in lieu of Answer to EAP's Petition for Stay at this docket.

⁷ A separate Answer responsive to OCA's Petition for Reconsideration will be filed by the Low Income Advocates at this docket.

⁸ EAP Petition at 2.

III. STANDARD OF REVIEW

The Commission clearly articulated the standard for granting a Petition for Reconsideration in Duick v. Pennsylvania Gas and Water Co., concluding:

A Petition for Reconsideration, under the provisions of 66 Pa. C.S. § 703(g), may properly raise any matters designed to convince this 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, [the Commission] agree[s] with the court in the *Pennsylvania Railroad Company* case, wherein it was stated that "[p]arties. . . cannot be permitted by a second motion to review and reconsider, to raise the same questions which were specifically decided against them. . . ." What [the Commission] expect[s] to see raised in such petitions are new and novel arguments, not previously heard, or considerations which appear to have been overlooked by the Commission.⁹

When granted, petitions for reconsideration can disrupt the balance struck in a final order. This has led Pennsylvania's appellate courts to find that such relief should be granted judiciously, and only under appropriate circumstances.¹⁰ The Commission is not required to expressly address every contention or argument raised by an interested party.¹¹ Even if the Commission does not expressly discuss and dispose of a particular issue raised by a party through the course of a proceeding, the Commission is considered to have implicitly addressed and disposed of the issue without discussion.¹² Thus, to meet the Duick standard for reconsideration, a party must raise an argument that is designed to convince the Commission that it should exercise its discretion. Simply asserting an issue that was previously argued or which was decided against a party is insufficient to warrant reconsideration.

⁹ Duick v. Pennsylvania Gas and Water Co., Docket No. C-R0597001 *et al.*, 56 Pa. PUC 553, 559 (1982), quoting Pennsylvania Railroad Co. v. Pennsylvania Public Service Commission, 179 A. 850, 854 (Pa. Super. Ct. 1935) (indicating that the standard set forth in Duick may be properly applied to petitions for clarification).

¹⁰ See West Penn Power v. Pa. PUC, 659 A.2d 1055 (Pa. Commw. Ct. 1995), petitions for allowance of appeal denied, 674 A.2d 1079 (Pa. 1996); City of Pittsburgh v. PennDOT, 416 A.2d 461 (Pa. 1980).

¹¹ See, e.g., PPL Electric Utilities Corporation Universal Service and Energy Conservation Plan for 2017-2019 Submitted in Compliance with 52 Pa Code § 54.74, Order, Docket No. M-2016-2554787, at 9 (order entered April 19, 2018) (hereinafter PPL Electric USECP for 2017-2019), citing Consolidated Rail Corp. v. Pa. PUC, 625 A.2d 741 (Pa. Commw. Ct. 1993); University of Pennsylvania v. Pa. PUC, 485 A.2d 1217 (Pa. Commw. Ct. 1984).

¹² The Commission is not required to consider expressly or at length each contention or argument raised by the parties. Consolidated Rail Corp. v. Pennsylvania Public Utility Commission, 625 A.2d 741 (Pa. Cmwlth. 1993).

In this proceeding, EAP's argument misconstrues the Commission's November 5 Order. The Ordering Paragraphs for which EAP seeks reconsideration simply notify utilities of the need to submit an informational filing regarding the extent to which they intend to follow the revised CAP Policy Statement; they do not create directives or obligations that are contrary to Pennsylvania law. The Commission has clear authority to require utilities to file addendums to their Universal Service and Energy Conservation Plans. Thus, reconsideration is not warranted.

IV. ANSWER IN RESPONSE TO EAP ARGUMENTS

1. The averments in this paragraph constitute a conclusion of law to which no response is required.
2. The averments in this paragraph constitute a conclusion of law to which no response is required.
3. The averments in this paragraph constitute a conclusion of law to which no response is required.
4. The averments in this paragraph constitute a conclusion of law to which no response is required.
5. DENIED. The Low Income Advocates disagree with EAP's contention that, by requiring the utilities to file addendums to their USECPs, the Order creates directives and compliance obligations contrary to Pennsylvania law.¹³ It is squarely within the Commission's authority to require the utilities to file addendums to their USECPs. In doing so, the Commission is not mandating compliance with the CAP Policy Statement – it is simply

¹³ EAP at 8.

requiring utilities to explain in writing whether, and to what extent, they will implement the Policy Statement by or before January 1, 2021.¹⁴

First, the Commission has the clear authority to require that each utility file an addendum to its respective USECP. In its Order, the Commission directs the utilities to file addendums to their existing or proposed USECPs, indicating how the utilities intend to voluntarily implement the policy changes specified in the amended CAP Policy Statement by January 1, 2021.¹⁵ Pursuant to the Electric and Natural Gas Customer Choice and Competition Acts (Competition Acts), the Commission has the authority and obligation to ensure that universal service and energy conservation programs are available and appropriately funded to serve those in need in each distribution territory.¹⁶ As such, the Competition Acts grant the Commission administrative oversight over the utilities' universal service programs.¹⁷ In furtherance of its obligation to oversee and ensure the adequacy of universal service programming, the Commission's regulations mandate that EDCs and NGDCs file a USECP every three years, to be reviewed and approved by the Commission.¹⁸ The Commission has the authority to reject a utility's USECP and to order revisions to the plan.¹⁹ In addition, each utility must report annually to the Commission on

¹⁴ To be clear, other obligations, such as settlement agreements by utilities, may *require* a utility to comply with any CAP Policy Statement that the Commission issues now or in the future. In that case, it is the settlement agreement that compels compliance rather than the Policy Statement itself.

¹⁵ Order at 5.

¹⁶ 66 Pa.C.S. § 2804(9); 66 Pa.C.S. § 2203 (8). *See also* 66 Pa.C.S. § 2802(10); 66 Pa.C.S. § 2203(7) (requiring the continuation of protections, policies and services assisting low income customers in affording utility service)

¹⁷*Id.*

¹⁸ 52 Pa. Code § 54.74; 52 Pa. Code § 62.4. The Commission recently updated this prescribed filing schedule through Commission Order. USECP Filing Schedule and Impact Evaluation Filing Schedule, M-2019-3012601 (Order Entered October 3, 2019).

¹⁹ *Id.*

the degree to which universal service and energy conservation programs within its service territory are available and appropriately funded.²⁰

The Competition Acts, together with the Commission’s regulations, empower the Commission to determine if the EDCs and NGDCs are meeting the goals of universal service and energy conservation. That explicit power necessarily enables the Commission to direct the utilities to provide information or make adjustments or changes to their programming at any time – regardless of when a utility’s periodic Plan filing must be made.²¹ In other words, the regulatory USECP filing requirements help facilitate the Commission’s oversight of universal service programming, but do not constrain the authority of the Commission to direct that utilities file information or make interim changes to their programming outside of the regulatory three-year review period. Indeed, the Commission’s exercise of authority to oversee universal service programming does not constitute a “directive” or “compliance obligation” in violation of law as EAP claims.

The Commission has invoked this authority on numerous occasions without objection from the utilities.²² The Ordering Paragraphs EAP challenges require *informational* filings by EDCs and NGDCs outlining each utility’s plan for how it will voluntarily comply with the revised CAP Policy Statement. Those filings are to be made at the most recent USECP docket for each utility. The authority of the Commission to require these filings derives not from the Policy Statement itself, but from the Commission’s unquestionable authority to regulate universal service programs by directing

²⁰ 52 Pa. Code § 54.75; 52 Pa. Code § 62.5.

²¹ 52 Pa. Code § 54.73(a); 52 Pa. Code § 62.3(a).

²² *See, e.g.*, First Energy Companies USECP 2019-2021, M-2017-2636969 (Order Entered May 23, 2019) (directing the First Energy Companies to file quarterly reports at its USECP docket, informing parties of its progress in implementing an online CAP application); Energy Affordability for Low-Income Customers, M-2017-2587711 (Order Entered January 17, 2019) (directing utilities to provide monthly tallies for all customers claiming zero income as part of each utility’s Universal Service Reporting).

supplemental filings by such utilities. The Commission could, at any time, enter orders in each individual USECP docket requiring this information to be provided. The Ordering Paragraphs simply reflect the Commission’s desire to efficiently obtain information from all of the EDCs and NGDCs through a single Order rather than through identical, individual orders at each of the utilities’ most recent USECP dockets.²³

To be clear, in requiring the utilities to file addendums to their respective USECP to explain the extent to which they intend to voluntarily comply with the revised Policy Statement, the Commission is not mandating utility compliance as a result of the Policy Statement. In amending its CAP Policy Statement, the Commission has declared its “future intentions” to scrutinize USECP filings and make significant changes to utility CAPs on a forward going basis to improve universal service programming in each distribution territory, consistent with its obligation under the Competition Acts.

The Commission was clear in its Order that, at this time, compliance with the revised CAP Policy Statement is voluntary, explaining: “Utilities will have the *opportunity* to implement these CAP policy changes through *voluntary* compliance with the amended CAP Policy Statement *or* to address the matters in utility-specific proceedings and/or as promulgated regulations.”²⁴ The Commission was also clear that “[a]ny matters that cannot be resolved by voluntary compliance with Commission policy will be addressed in utility-specific proceedings.”²⁵ This is exactly what a policy statement from an administrative agency is designed to do: Make a pronouncement of intended policy changes, with

²³ As discussed more fully in paragraph 13, EAP appears simply to favor a far less efficient approach, whereby the Commission would wait to request this information in each utility’s next USECP. EAP’s proposal thus concedes that the Commission has the authority to order the utilities to provide the requested information. EAP seems to suggest this approach solely for purposes of delay because it disfavors the Commission’s proposed timeline.

²⁴ Order at 13.

²⁵ Id.

sufficient flexibility to allow for appropriate adjustments as necessary through future direct review and oversight.²⁶

6. The averments in this paragraph constitute a conclusion of law to which no response is required. Nevertheless, by way of further answer, the Low Income Advocates DENY any implication that the Commission's Order mandates compliance with its revised Policy Statement. As discussed above, the Commission has statutory and regulatory authority to monitor utility universal service programs and to require informational filings as set forth in the Ordering Paragraphs that EAP challenges. The Ordering Paragraphs are separate and distinct from the Policy Statement itself, which nowhere compels specific actions or compliance by the utilities. Indeed, as the Commission made clear throughout its Order, compliance with the revised CAP Policy Statement is "voluntary" at this stage, and "[a]ny matters that cannot be resolved by voluntary compliance with Commission policy will be addressed in utility-specific proceedings."²⁷
7. DENIED. EAP is wrong in its view that the Order appears to initiate a process with complex procedural and practical implications.²⁸ The Ordering Paragraphs EAP challenges merely require EDCs and NGDCs to make informational filings at their respective USECP dockets to inform the Commission and stakeholders how they plan to change their universal service programs in light of the CAP Policy Statement amendments. The specific contents of the addendums are not circumscribed and the utilities are free to indicate any practical considerations that would prevent or delay the implementation of the various policy

²⁶ See Mid-Atlantic Power Supply Ass'n v. Pa. PUC, 746 A.2d 1126 (Pa. Commw. Ct. 2000), citing Dep't of Environmental Resources v. Rishton Mining Co., 59 A.2d 1168 (Pa. Commw. Ct. 1991) ("A policy statement does not establish a binding norm but announces the agency's tentative future intentions, and provides the agency with the flexibility to follow the announced policy or modify it if the circumstances are appropriate.")

²⁷ See, e.g., Order at 13, 100.

²⁸ EAP at 9.

changes. As EAP itself noted, a number of the amendments adopted in the revised CAP Policy Statement are already a part of the EDC and NGDC's current USECPs and/or have been more recently implemented via utility specific proceedings to update and improve individual utility USECPs.²⁹

8. DENIED. EAP incorrectly argues that filing the addendums required by the Ordering Paragraphs would initiate a new compliance proceeding.³⁰ The Ordering Paragraphs EAP challenges merely require EDCs and NGDCs to make informational filings at their respective USECP dockets regarding how they plan to change their universal service programs in light of the CAP Policy Statement amendments. While the Commission or other parties may choose to initiate a formal proceeding after reviewing the filed addendums, consistent with the Commission's regulations governing formal proceedings,³¹ the Commission's requirement that the utilities file addendums at their current or pending USECP docket does not create or initiate a new compliance proceeding, as EAP claims.
9. DENIED. Although the Order does not reference the Commission's recent USECP Filing Schedule Order, it is clear that the Commission expects the utility addendums to include all information relevant to how the utility intends to voluntarily comply with the CAP Policy Statement amendments – including any practical, procedural, or timing issues that it anticipates may occur. EAP misses the mark when it argues that the Order does not consider or anticipate how the addendum requirement might impact the new timeline

²⁹ EAP at 2.

³⁰ EAP at 9.

³¹ See 52 Pa. Code §§ 5.21, .31, .41, .42

established by the Commission's USECP Schedule Order.³² If a utility has procedural concerns, it can include this information in its addendum.

10. DENIED. The Ordering Paragraphs establish a process for the utilities to state their intentions with regard to implementation of the CAP Policy Statement amendments. The Low Income Advocates disagree with EAP's suggestion that a review of the dozen utility USECP addendums will be cumbersome or will delay implementation of the CAP Policy Statement amendments.³³ The Low Income Advocates believe that the process proposed in the Order will be efficient, allowing the Commission and interested parties to review all of the addendums at the same time, instead of repeating this assessment time and again in separate proceedings over the next several years. The parties will also be able to streamline their review, as well as any questions posed to the utilities. The utilities are also likely to benefit from this efficiency because they will be able to compare their respective plans and consult with one another about the feasibility and anticipated cost of various approaches. Ultimately, the Commission's addendum requirement will help create consistency across universal service programs. By identifying areas where a utility is already compliant with the CAP Policy Statement, the addendum requirement will also narrow the issues requiring review in the context of a utility-specific formal proceeding.³⁴

11. DENIED. EAP argues that it is concerned that the Commission will not have time to adequately review and approve the utility USECP addendums within the year between the addendum due date and January 1, 2021, when the Commission has encouraged

³² EAP at 9; USECP Filing Schedule and Impact Evaluation Filing Schedule, M-2019-3012601 (Order Entered October 3, 2019).

³³ EAP at 10.

³⁴ Order at 100.

implementation.³⁵ The Low Income Advocates believe it is reasonable for the Commission to complete its review and approval process within a year.³⁶ The Commission’s review will be limited to a review of the addendums, and each utility’s intent with respect to the seventeen changes outlined in the Order. If operational changes will require additional time, the utilities can indicate projected timeframes in their addendum filings. By contrast, if this review takes place solely within the context of the “established method for revising USECPs”, as EAP proposes,³⁷ there will be many more issues for the Commission and interested parties to address, which could further delay the implementation of the policy statement. Indeed, for some utilities, it will be at least five years before the next periodic USECP review process to begin,³⁸ which will significantly delay implementation of the Commission’s declared policy – even if the utility seeks to voluntarily comply with the policy, in whole or in part.

12. DENIED. The Commission should not amend its Order to clarify that a utility’s submission of a USECP addendum is voluntary and does not initiate a compliance proceeding, as EAP proposes.³⁹ As explained above, the Commission is empowered to require informational filings from utilities in the context of their USECPs, and the Ordering Paragraphs do not expand or deviate from the Commission’s clear authority over universal service programs. Thus, the Commission can and should require the utilities to file addendums explaining the extent to which they intend to voluntarily

³⁵ EAP at 10-11.

³⁶ It bears noting that the Commission completed a far more extensive process in this proceeding – a process that included multiple rounds of comments, an energy affordability study, multiple rounds of data submission by the utilities, and a stakeholder meeting - in only 2.5 years.

³⁷ EAP at 11.

³⁸ See Universal Service and Energy Conservation Plan (USECP) Filing Schedule and Independent Evaluation Filing Schedule, Order, Docket No. M-2019-3012601, at 14 (order entered Oct. 3, 2019).

³⁹ EAP at 11.

comply with the CAP Policy Statement. The specific content of the addendums is not circumscribed and the utilities are free to indicate any practical considerations that would prevent or delay the implementation of the various policy changes.

13. DENIED. EAP's proposal of a USECP by USECP approach to the implementation of the CAP Policy Statement amendments would be inefficient and cause unnecessary delay.⁴⁰ EAP admits the Commission could file an order in each utility's USECP docket requiring the information sought by the Commission in the Ordering Paragraphs EAP challenges. Yet, EAP presents no good argument for why the Commission cannot require that information now, through the Order, which is a far more efficient means to notify all interested parties and to ensure case-by-case evaluation of each utility's USECP going forward. EAP's objections to the Ordering Paragraphs appear to be intended only to delay Commission oversight of USECPs, potentially prolonging CAP participants' exposure to unaffordable bills and increasing the number of low income households that are unable to access CAP due to administrative and programmatic barriers. Such delays are likely to increase the risk of termination and the severe collateral consequences that accompany loss of utility service for low-income households. As the Commission concluded in its Order, the current maximum energy burden standards "do not reflect reasonable or affordable payments for many low-income customers" – and have caused significant harm to those with income at the very bottom of the federal poverty level (0-50% of the federal poverty income guidelines).⁴¹ It is therefore imperative that the Commission's intended policy changes be implemented without delay to shield low income customers from ongoing harm.

⁴⁰ EAP at 11.

⁴¹ Order at 27, 30-31.

V. CONCLUSION

For all of the foregoing reasons, the Low Income Advocates respectfully request that the Commission deny EAP's Petition for Reconsideration and Clarification. Irrespective of the Commission's decision on EAP's Petition, the Low Income Advocates urge the Commission to publish the CAP Policy Statement in the Pennsylvania Bulletin to ensure that the effectiveness of the CAP Policy Statement will not be delayed by the Commission's review of the instant petition.

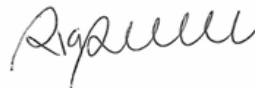
Respectfully submitted,

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December 9, 2019

Verification

I, **Ria M. Pereira, Esq.**, legal counsel for the Coalition for Affordable Utility Services and Energy Efficiency (“CAUSE-PA”), on behalf of CAUSE-PA, hereby state that the facts contained in the foregoing pleadings are true and correct to the best of my knowledge, information, and belief, that I am duly authorized to make this Verification, 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 10 Pa. C.S. § 4904 (relating to unsworn falsification to authorities).



Ria M. Pereira, Esq.
On behalf of the Coalition for Affordable Utility Services
and Energy Efficiency in Pennsylvania (CAUSE-PA)

Verification

I, **Joline R. Price Esq.**, legal counsel for Tenant Union Representative Network (TURN) and Action Alliance of Senior Citizens of Greater Philadelphia (Action Alliance), on behalf of TURN and Action Alliance, hereby state that the facts contained in the foregoing pleadings are true and correct to the best of my knowledge, information, and belief, that I am duly authorized to make this Verification, 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 10 Pa. C.S. § 4904 (relating to unsworn falsification to authorities).



Joline R. Price Esq.

On behalf of the Tenant Union Representative Network (TURN) and Action Alliance of Senior Citizens of Greater Philadelphia (Action Alliance)

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

2019 Amendments to Policy Statements on Customer Assistance Programs 52 Pa. Code §§ 69.261-69.267	:	Docket No. M-2019-3012599
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Energy Affordability for Low-Income Customers in Pennsylvania	:	Docket No. M-2017-2587711
	:	
	:	
Review of Universal Service and Energy Conservation Programs	:	Docket No. M-2017-2596907
	:	

CERTIFICATE OF SERVICE

I hereby certify that I have this day served copies of the **Joint Answer of CAUSE-PA and TURN et al. to the Petition of the Energy Association of Pennsylvania for Reconsideration and/or Clarification** in accordance with the requirements of 52 Pa. Code § 1.54 in the manner and upon the persons listed below.

VIA FIRST-CLASS MAIL AND/OR EMAIL

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*On Behalf of TURN and Action Alliance and
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