



April 20, 2020

*Via e filing*

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

**Re: Petition for Expedited Approval of PGW's Letter Request to Amend its  
Universal Service and Energy Conservation Plan**

**Docket No. P-2020-3018867**

**Answer to Petition for Reconsideration of the Office of Consumer Advocate**

Dear Secretary Chiavetta,

Please find enclosed 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 the Low Income Advocates) to the Petition for Reconsideration of the Office of Consumer Advocate in the above referenced matter.

Copies are being served by email, pursuant to the attached Certificate of Service. Due to the COVID-19 pandemic, we are not sending hard copies unless requested by the parties. Please contact me with any questions or concerns. I can be reached at (215) 981-3756 or by email at [jprice@clsphila.org](mailto:jprice@clsphila.org).

Respectfully submitted,

Joline R. Price, Esquire  
Enclosures

Cc: Office of Special Assistants (via email to [RA-OSA@pa.gov](mailto:RA-OSA@pa.gov))  
Certificate of Service

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**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition for Expedited Approval of :  
PGW’s Letter Request to Amend its Universal : Docket No. P-2020-3018867  
Service and Energy Conservation Plan :  
Pursuant to the 2019 Amendments to the Policy :  
Statement at Docket No. M-2019-3012599 :

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**JOINT ANSWER IN OPPOSITION TO THE PETITION OF THE  
OFFICE OF CONSUMER ADVOCATE  
FOR RECONSIDERATION**

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Tenant Union Representative Network, Action Alliance of Senior Citizens of Greater Philadelphia, and Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania (collectively, the Low Income Advocates), through counsel at Community Legal Services and the Pennsylvania Utility Law Project, hereby submit this Joint Answer in Opposition to the Petition for Reconsideration by the Office of Consumer Advocate (OCA).

**I. INTRODUCTION AND BACKGROUND**

On January 6, 2020, PGW submitted a cover letter, accompanying its addendum to its 2017-2022 Universal Service and Energy Conservation Plan (USECP), addressing the policy changes adopted by the Commission in its November 5, 2019 Order adopting amendments to the Customer Assistance Program Policy Statement. In pertinent part, PGW’s letter requested the Commission approve, as a Pilot Program, modifications to its Customer Responsibility Program (CRP) to implement the Commission’s revised energy burdens, eliminate monthly \$5 copayments for arrearage forgiveness, and implement a CRP consumption limitation. Following the submission of its January 6, 2020 letter requesting approval of its Pilot Program, PGW convened discussions with interested parties, inviting OCA, the Low Income Advocates, the

Office of Small Business Advocate (OSBA), the Bureau of Investigation and Enforcement, representatives from the Clean Air Council, and counsel for the Industrial consumer interest groups. Stakeholder meetings were held on Wednesday, January 22, 2020 and February 11, 2020. PGW also invited parties to engage in informal discovery, and provided written responses to questions from OCA and the Low Income Advocates regarding cost estimates and consumption limits, respectively.

On February 21, 2020, PGW filed its Petition for Expedited Approval of the Pilot Program described in its January 6, 2020 letter, and requested that parties respond within 10 days. No stakeholder objected to PGW's request for response within 10 days. On March 2, 2020, the Low Income Advocates filed a Letter in Lieu of an Answer in Support of PGW's Petition for Expedited Approval. On the same day, the OCA filed an Answer asserting that PGW's Pilot "should not be approved until a full review can be completed" and opposing expedited review. OCA Answer at 5. OCA expressed concerns with program costs and the impact of program changes on LIHEAP. Id. Finally, OCA's Answer asserted that the significance of the potential cost increases, in and of themselves, rendered PGW's proposal "far beyond the constraints of what should be considered a pilot program." OCA Answer at 6.

On March 26, 2020, the Commission approved PGW's proposal to modify its Customer Responsibility Program (CRP) to implement the Commission's newly adopted CAP Policy Statement. In its March 26, 2020 Order, the Commission observed that PGW's Pilot Program sought to implement changes consistent with the recent CAP Policy Statement amendments, which were the product of comprehensive review of "the policies, practices, procedures, and impacts of universal service programs on low-income customers and other ratepayers." Order at

4-5.<sup>1</sup> The Commission noted that PGW's request for expedited approval was based on PGW's six to seven month window to implement CRP modifications prior to replacing its customer information system (CIS). Order at 7.

In approving PGW's CRP modifications, the Commission specifically found that those modifications: (1) "are consistent with the amended maximum energy burden levels in the CAP Policy Statement"; (2) enable PGW to gather data from the new energy burdens that will provide a starting point for analysis in the future; and (3) eliminate an annual cost of \$60 per CRP participant to earn preprogram arrearage forgiveness, which would not be consistent with the Commission's approved energy burdens. Order at 15. The Commission also approved PGW's consumption limits and customer education proposal, which were unopposed. Order at 17-18. In considering the cost impacts of PGW's proposal, the Commission specifically acknowledged that "increased CAP costs will likely result in a greater financial burden on some ratepayers" but that PGW's proposed CRP modifications "would likely provide a greater benefit than the harm that could be caused by the projected increased costs." Order at 19. Finally, because PGW's CRP modifications were approved on a pilot basis, the Commission committed to further examination and exploration of potential increased costs in PGW's 2023-2027 USECP filing. *Id.* Of note, PGW's next USECP filing is due to the Commission in just over 18 months, on November 1, 2021, at which time PGW's pilot CRP will be subject to full review in the context of reviewing PGW's full USECP.<sup>2</sup>

On April 10, 2020, OCA filed its Petition for Reconsideration of the Commission's March 26 Order. As set forth herein, the Low Income Advocates submit that OCA has failed to

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<sup>1</sup> Indeed, the Commission urged utilities to implement the CAP Policy Statement amendments as expeditiously as possible. See Order at 6 (citing February 6, 2020 Order, Docket No. P-2020-3016889 at 12).

<sup>2</sup> See Universal Service and Energy Conservation Plan (USECP) Filing Schedule and Independent Evaluation Filing Schedule, Order, Docket M-2019-3012601, at 12 (order entered Oct. 3, 2019).

satisfy the standard for granting a petition for reconsideration. OCA erroneously submits that: (1) the “Commission did not fully consider the due process rights of the parties to this proceeding”; (2) the Commission “appears to have overlooked its determination in the CAP Policy Statement Proceeding” (M-2019-3012599)<sup>3</sup>; (3) the Commission overlooked or failed to consider prior procedures for reviewing changes to PGW’s Universal Service and Energy Conservation Plan; and (4) new issues regarding the impact of the COVID-19 pandemic justify granting reconsideration. OCA Petition at 4-5. As discussed below, the OCA is incorrect in each of these submissions. OCA has not satisfied the legal standard for a Petition for Reconsideration, and as such, the PUC should deny OCA’s Petition.

## II. LEGAL STANDARD

Petitions for reconsideration and clarification are reviewed pursuant to 66 Pa. C.S. § 703(g), 52 Pa. Code § 5.572, and Duick et al. v. Pennsylvania Gas and Water Co., 56 PUC 553 (1982). “A petition for reconsideration...may properly raise any matters designed to convince the Commission that it should exercise its discretion...to rescind or amend a prior order in whole or in part.” Duick at 558. A party may not raise the same questions in a petition for reconsideration that were raised in a prior pleading. Pennsylvania R. Co. v. Pub. Serv. Comm’n, 179 A. 850, 854 (Pa. Super. 1935). Such questions raised ought to be those that “appear to have been overlooked or not addressed by the Commission.” Id. If “new and novel” questions are not raised, a party will not succeed in persuading the Commission that the “initial decision on a matter or issue was either unwise or in error.” Duick at 558.

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<sup>3</sup> The Final Opinion and Order at Docket No. M-2019-3012599 adopted amendments to the Commission’s Policy Statement on Customer Assistance Programs, following extensive review and comment in two related dockets, Energy Affordability for Low-Income Customers, Docket No. M-2017-2587711, and Review of Universal Service and Energy Conservation Programs, Docket No. M-2017-2596907.

It is well settled that the Commission is not required to consider expressly or at length each contention or argument raised by the parties. Consolidated Rail Corp. v. Pa. PUC, 625 A.2d 741 (Pa. Commw. Ct. 1993). 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. Id.

### **III. ANSWER**

#### **A. OCA's Due Process Rights Were Adequately Considered**

OCA submits that the Commission failed to adequately consider its due process rights and contends that it was deprived of a meaningful opportunity to evaluate or comment on the potential costs of PGW's CRP modifications.<sup>4</sup> OCA acknowledges, contrary to the standard in Duick, that this is not a new or novel issue, but is instead precisely the concern it raised in its Answer opposing expedited review. Petition at 5. In its Answer, OCA specifically raised its concerns regarding the cost impacts of PGW's CRP modifications. OCA Answer to PGW Pilot Plan Petition at 4. OCA's Answer did not request that PGW's proposed CRP Modifications be referred to the Office of Administrative Law Judges (OALJ) or identify any substantial factual dispute requiring hearing.<sup>5</sup> The Commission recognized the OCA's cost concerns, noting that they were "compelling," but ultimately declined to adopt the OCA's position. Order at 9. On this basis alone, OCA's assertion fails to meet the Duick standard and does not warrant reconsideration.

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<sup>4</sup> OCA relies upon Barasch v. Pennsylvania Pub. Util. Comm'n, 546 A.2d 1296 (Pa. Commw. 1988) for the proposition that due process requires notice of government action and an opportunity to be heard to challenge that action; however in Barasch the Commonwealth Court affirmed the principle that procedural due process does not require notice and a hearing in every conceivable situation involving administrative action.

<sup>5</sup> USECP filings are not automatically referred to the OALJ, but instead are typically approved following a comment process.

Moreover, OCA has provided extensive comments concerning CAP cost impacts (some of which were specifically directed at PGW's CRP) in the Commission's proceedings leading up to the adoption of the amended CAP Policy Statement, which urges utilities to expeditiously implement the reduced energy burdens. In its August 8, 2017 Comments to the Commission's statewide review of Universal Service and Energy Conservation Programs, OCA raised concerns about the costs of CAP to non-participants and submitted that cost impacts must be evaluated in any proposed plan changes.<sup>6</sup> In its reply comments at that docket, OCA again asserted that CAP costs would need to be thoroughly analyzed to determine impacts on non-participant ratepayers.<sup>7</sup> Later, in its Comments in the Commission's statewide energy affordability investigation, OCA specifically described PGW's projected increase in costs and asserted that more study was needed.<sup>8</sup> Likewise, OCA raised concerns regarding the impact of CAP costs on low income customers who do not or cannot participate in CAP.<sup>9</sup> In its Reply Comments at the same docket, OCA reiterated its concern with the cost of implementing lower energy burden standards in PGW's service territory, specifically commenting on PGW's estimates of the cost to non-CRP customers.<sup>10</sup> Finally, in its November 20, 2019 Petition for Reconsideration/Clarification of the Commission's revised CAP Policy Statement, OCA expressed its view on the importance of cost information associated with CAP modifications to assess the impact on other residential customers.<sup>11</sup>

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<sup>6</sup> In re Review of Universal Service and Energy Conservation Programs, Comments of the Office of Consumer Advocate, Docket No. M-2017-2596907, at 24, 44 (comments filed August 8, 2017).

<sup>7</sup> In re Review of Universal Service and Energy Conservation Programs, Reply Comments of the Office of Consumer Advocate, Docket No. M-2017-2596907, at 24-26 (reply comments filed October 16, 2017).

<sup>8</sup> In re Energy Affordability for Low-Income Customers, Comments of the Office of Consumer Advocate, Docket No. M-2017-2587711, at 8, 17 (comments filed May 8, 2019).

<sup>9</sup> Id. at 15-16.

<sup>10</sup> In re Energy Affordability for Low-Income Customers, Reply Comments of the Office of Consumer Advocate, Docket No. M-2017-2587711, at 6-7 (reply comments filed May 23, 2019)

<sup>11</sup> In re 2019 Amendments to Policy Statements on Customer Assistance Programs 52 Pa. Code §§ 69.261-69.267, Order on Reconsideration/Clarification, Docket No. M-2019-3012599 (order entered Feb. 6, 2020).

While the Low Income Advocates agree with OCA's implicit proposition that USECP proceedings warrant meaningful review that enables robust stakeholder input, including discovery and hearings when necessary to develop an evidentiary record to resolve contentious facts, OCA errs in submitting that its due process rights were infringed upon through the course of the current proceeding. Pennsylvania courts have consistently held that due process is a flexible concept that varies depending on the facts present in a case. See, e.g., Harrington v. Com., Dep't of Transp., Bureau of Driver Licensing, 763 A.2d 386, 391 (Pa. 2000); Barasch v. Pennsylvania Pub. Util. Comm'n, 546 A.2d 1296 (Pa. Commw. Ct. 1988). In USECP proceedings, the Commission has previously explained that its review process varies depending on the issues raised in such proceedings. In disposing of a petition for reconsideration raising due process concerns in a USECP proceeding, the Commission explained:

[T]he Commission has generally reviewed universal service and energy conservation plan updates and approved them without notice and a hearing when the filings complied with law. Based on the facts of the specific case, however, the Commission has sometimes employed appropriate alternative procedures for reviewing such a filing. In at least one case, the Commission consolidated the triennial plan review with a related proceeding. In at least one other case, the Commission issued a tentative order approving a universal service and energy conservation plan and requested comments, noting that the matter could be referred to the Office of Administrative Law Judges for hearings if factual questions were raised by the comments.<sup>12</sup>

In this circumstance, OCA was provided adequate due process. OCA actively participated in the proceedings culminating in the Commission's adoption of the amended CAP Policy Statement, and was therefore aware of the Commission's guidance that utilities should seek to implement that policy statement expeditiously. OCA was on notice that PGW sought to expeditiously implement, as a pilot program, the energy burden standards of the CAP Policy Statement when it filed its January 6, 2020 letter seeking approval of the same. OCA

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<sup>12</sup> In re Dominion Peoples Universal Service and Energy Conservation Plan for 2009-2011, Order, Docket No. M-2008-2044646, at 11-12 (order entered March 26, 2009).

participated in informal discussions with PGW and other parties, and requested and received further documentation from PGW related to cost estimation. Thereafter, OCA availed itself of the opportunity to be heard on PGW's petition by filing an Answer on March 2, 2020. The Commission considered OCA's Answer, and disposed of the concerns raised therein. The Commission was not required to provide further due process protections to OCA. In the limited context of approving modifications to CRP on a pilot basis, for the express purpose of implementing the Commission's CAP Policy Statement amendments, due process is sufficiently flexible to permit expedited consideration and approval.

**B. The Commission's Order Does Not Overlook its Recent Determination Regarding USECP Cost Increases**

OCA submits that the Commission's February 6, 2020 Reconsideration Order in the CAP Policy Statement proceeding was overlooked, and that the Commission is, by implication, required to provide it an opportunity to more thoroughly review the cost impacts of PGW's CRP modifications in advance of approval. OCA Petition at 9-10. Because OCA raised this specific issue in its Answer, asserting that the Commission should not approve PGW's pilot modifications until it could fully review the potential increased costs of the program, OCA has failed to raise a new or novel argument necessary to satisfy the Duick standard and the Commission should deny reconsideration. See OCA Answer at 5-6.

Additionally, OCA's contention that the Commission has overlooked its February 6, 2020 Reconsideration Order is incorrect and premised on a misreading of that Order. There, the Commission held that, *if warranted*, cost impacts "can be addressed in utility-specific proceedings."<sup>13</sup> OCA seeks to expand upon this language, asserting that the Commission has

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<sup>13</sup> In re 2019 Amendments to Policy Statements on Customer Assistance Programs 52 Pa. Code §§ 69.261-69.267, Order on Reconsideration/Clarification, Docket No. M-2019-3012599, at 11 (order entered Feb. 6, 2020).

predetermined that, in the context of PGW's pilot proposal, not only is review of cost impacts warranted, but it is required. That simply is not what the Commission's Reconsideration Order says. The Commission was unquestionably cognizant of cost impacts as a result of the implementation of the energy burdens in the CAP Policy Statement, and specifically acknowledged in its Order approving PGW's Petition that cost impacts of PGW's modifications to CRP will be addressed in its 2023-2027 USECP Proceeding, after an opportunity to gain experience with the actual cost impacts through the pilot proposed in PGW's Petition. Order at 19.

Furthermore, in approving PGW's pilot modifications to CRP, the Commission explicitly acknowledges that doing so will permit PGW to obtain the necessary data to analyze the cost impacts associated with attaining the Commission's approved energy burdens. OCA's circular argument contends that the Commission should not approve PGW's pilot modifications to CRP without examining cost data, when the Commission's approval of PGW's Pilot Program is specifically intended to obtain the cost data to be examined. The Commission's approval of PGW's implementation of the energy burdens in the CAP Policy Statement, on a pilot basis, is entirely consistent with its Reconsideration Order and enables the Commission and all stakeholders an opportunity, in a utility-specific proceeding, to review cost impacts to the extent such a review is warranted at that time.

**C. The Commission's Order Does Not Overlook the Normal Process of USECP Review**

OCA submits that reconsideration is warranted because the Commission historically engages in a certain stakeholder review process, but did not do so in this proceeding. Petition at 11-12. OCA further contends that expedited treatment was unnecessary and predicated on an "artificial timeline" related to PGW's CIS replacement project. Petition at 12. Both of these

arguments simply reframe OCA's prior submissions that PGW's plan should be subject to full review and that such review could not be accomplished in 30 days. OCA Answer at 5. As discussed above, OCA fails to satisfy the Duick standard for reconsideration because these contentions were previously raised by the OCA.

Furthermore, OCA's contention that the Commission is required to follow its traditional stakeholder review process is unfounded. As discussed above, and particularly in light of the limited issues presented in PGW's pilot proposal to modify CRP to implement provisions of the Commission's amended CAP Policy Statement, the Commission has flexibility in determining how to proceed. The Low Income Advocates assert that there are often issues that arise in the context of a USECP proceeding that warrant closer examination, especially when there is no data or analysis to support a proposed policy or program rule. This is not such an occasion. The Commission has repeatedly weighed the cost impact of reduced energy burden standards in PGW's service territory over more than three years of investigation – including in PGW's instant petition – and each time has concluded that, on balance, the need to provide affordable energy services to vulnerable low income consumers outweighs the cost, and that more experience with the actual cost of the pilot will help make a determination about future programming.

Finally, OCA's contention that the Commission erred in approving PGW's pilot proposal based on an "artificial timeline" associated with PGW's CIS replacement project ignores that the Commission weighed the merits of PGW's request when granting its Petition for Expedited Approval. The Commission evaluated PGW's basis for requesting expedited review: its need to implement the proposed CRP modifications prior to implementing its new CIS system or else be unable to do so prior to its next USECP. That delay would preclude PGW from obtaining actual experience utilizing the approved energy burdens adopted in the CAP Policy

Statement, and obtaining valuable data related to the implementation of the energy burdens. Order at 9. Weighing the benefit of implementing the CRP modifications against OCA's opposition, the Commission correctly acted on an expedited basis to approve PGW's Pilot Program.

**D. The COVID-19 Pandemic Supports the Commission's Order and Does Not Justify Reconsideration**

OCA submits that "continuing developments" related to the COVID-19 pandemic constitute new issues, warranting reconsideration pursuant to Duick. Petition at 12-13.<sup>14</sup> While supporting the Commission's emergency actions on behalf of Pennsylvania consumers, OCA nonetheless submits that COVID-19 will have additional cost impacts that must be analyzed in association with PGW's modifications to CRP. In short, OCA seeks to reframe its prior argument that the Commission overlooked cost impacts – arguing now that the Commission must reverse its determination to allow for a full assessment of potential CRP costs in light of the still-developing public health crisis. As OCA itself acknowledges, the economic impact of COVID-19 is only beginning to come to light, and so the Commission could not have overlooked the issue when it entered its Order. The Commission was well aware of the unfolding economic crisis when issuing its Order. In fact, the Commission's Order in this proceeding was issued during a telephonic Public Meeting, two weeks after moving to remote operations and closing its doors to the public. Clearly the Commission did not overlook the unfolding economic crisis associated with COVID-19 when it made its Order. For these reasons, OCA fails to satisfy the Duick standard for reconsideration and its request must be denied.

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<sup>14</sup> The Low Income Advocates note that OCA incorrectly asserts that PGW's modifications to CRP will not go into effect until after PGW's CIS replacement project is completed. Petition at 13. To the contrary, PGW intends to implement the pilot program before it replaces its CIS. PGW Petition at 2.

The Low Income Advocates further submit that OCA errs in conflating cost impacts of COVID-19 with PGW’s proposed CRP modifications. The cost impacts associated with implementation of PGW’s Pilot Program can be fully assessed in PGW’s next USECP proceeding, as discussed above. The cost impacts of COVID-19, which are not limited to PGW’s CRP program, are generated across customer classes and business operations. The impact of COVID-19 on utilities and utility consumers can and should be the subject of further consideration and evaluation in separate contexts.

While the health and economic impact of COVID-19 is not confined to PGW’s CRP customers, the Low Income Advocates submit that the increased risk of financial and physical harm to low-income Philadelphians if energy burdens are not reduced far outweighs the delay that would result from granting reconsideration. Low income PGW customers need help *right now* to access affordable energy services in their home.<sup>15</sup> This is true *especially* in light of the economic impact of COVID-19 on low income communities. Indeed, even if COVID-19 was a “new or novel” argument not previously considered by the Commission, the economic impact of the pandemic weighs heavily in favor of a reduction in energy burden to ensure that low income consumers are receiving a bill that is targeted to reach affordability based on the household’s income.

While the potential economic impacts of COVID-19 are far ranging, it is not possible now, and will not be possible for many months or perhaps longer, to fully assess how COVID-19 will affect utility affordability in Philadelphia. In light of this, it is unreasonable to further delay delivery of affordable utility service according to standards adopted before the COVID-19

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<sup>15</sup> See American Inequality Meets COVID-19, The Economist (April 18, 2020), <https://www.economist.com/united-states/2020/04/18/american-inequality-meets-covid-19> (discussing emerging data showing that low income and minority communities are hardest hit by the pandemic, both in terms of health and economic impacts and outcomes.)

pandemic. If those standards were reasonable before, they are even more reasonable now, given the pervasive financial hardships to households caused by the pandemic. In the months ahead, access to affordable natural gas service will be vital; implementation of the energy burdens approved by the Commission should not be delayed.

#### IV. CONCLUSION

For the foregoing reasons, the Low Income Advocates request that the Commission deny OCA's Petition for Reconsideration.

Respectfully submitted,



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April 20, 2020

## VERIFICATION

I, Joline Price, on behalf of Tenant Union Representative Network and Action Alliance of Senior Citizens of Greater Philadelphia, hereby state that the facts contained in the foregoing pleading 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 18 Pa. C.S. §4904 (relating to unsworn falsification to authorities).

A handwritten signature in black ink, appearing to read "Joline Price". The signature is fluid and cursive, with the first name being more prominent.

Date: April 20, 2020

Joline Price  
*Counsel for TURN et al.*

## VERIFICATION

I, Elizabeth R. Marx, Esq., on behalf of Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania, hereby state that the facts contained in the foregoing pleading 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 18 Pa. C.S. §4904 (relating to unsworn falsification to authorities).

A handwritten signature in blue ink, appearing to read "Elizabeth R. Marx".

Elizabeth R. Marx, Esq.  
*Counsel for CAUSE-PA*

Date: April 20, 2020

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition for Expedited Approval of :  
PGW's Letter Request to Amend its Universal : Docket No. P-2020-3018867  
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Pursuant to the 2019 Amendments to the Policy :  
Statement at Docket No. M-2019-3012599 :

CERTIFICATE OF SERVICE

I hereby certify that I have this day served copies of the Low Income Advocates' Joint Answer in Opposition to the Petition of the Office of Consumer Advocate for Reconsideration in the above-captioned matter, as set forth below in accordance with the requirements of 52 Pa. Code §1.54:

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April 20, 2020



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