



May 12, 2020

VIA E-File

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

**Re: Petition of Industrial Energy Consumers of Pennsylvania to Suspend
Implementation of Act 129 Phase IV Requirements and Request for Other Relief
Docket No. P-2020-3019562, M-2020-3015228, M-2020-3019262
*Answer of CAUSE-PA***

Dear Secretary Chiavetta:

Please find the attached **Answer of the Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania (CAUSE-PA)** to the Petition of Industrial Energy Consumers of Pennsylvania to Suspend Implementation of Act 129 Phase IV Requirements and Request for Other Relief

Pursuant to the Commission's Emergency Order issued on March 20, 2020, and as indicated on the attached Certificate of Service, copies will be served on parties of record by email only.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read "John W. Sweet".

John W. Sweet, Esq.
Counsel for CAUSE-PA

CC: Parties of Record, Certificate of Service
Joseph Sherrick, Bureau of Technical Utility Services, josherrick@pa.gov
Adam Young, Esq., Law Bureau, adyoung@pa.gov

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

Petition of Industrial Energy Consumers of Pennsylvania : Docket No. P-2020-3019562
to Suspend Implementation of Act 129 Phase IV : M-2020-3015228
Requirements and Request for Other Relief : M-2020-3019262

ANSWER OF THE COALITION FOR AFFORDABLE UTILITY SERVICE AND
ENERGY EFFICIENCY IN PENNSYLVANIA (CAUSE-PA) TO THE PETITION OF THE
INDUSTRIAL ENERGY CONSUMERS OF PENNSYLVANIA
TO SUSPEND IMPLEMENTATION OF THE ACT 129 PHASE IV REQUIREMENTS
AND FOR OTHER RELIEF

The Coalition for Affordable Utility Service and Energy Efficiency in Pennsylvania (CAUSE-PA)¹, pursuant to 52 Pa Code § 5.61, hereby submits the following Answer to the Petition of the Industrial Energy Consumers of Pennsylvania (IECPA) to Suspend Implementation of the Act 129 Phase IV Requirements and for Other Relief (hereinafter the “IECPA Petition”). CAUSE-PA has standing to answer IECPA’s Petition because its members have or will suffer a direct, immediate, and substantial injury to an interest as a result of this proceeding.² For the purposes of

¹ CAUSE-PA is an unincorporated association of low-income individuals that advocates on behalf of its members to enable consumers of limited economic means to connect to and maintain affordable water, electric, heating and telecommunication services. CAUSE-PA membership is open to moderate and low- income individuals residing in the Commonwealth of Pennsylvania who are committed to the goal of helping low-income families maintain affordable access to utility services and achieve economic independence. CAUSE-PA is located, c/o the Pennsylvania Legal Aid Network, at 118 Locust Street, Harrisburg, PA 17101.

² The Commonwealth Court has consistently stated that “an association may have standing as a representative of its members ... as long as an organization has at least one member who has or will suffer a direct, immediate, and substantial injury to an interest as a result of the challenged action, [i.e., is aggrieved, the organization] has standing.” Energy Cons. Council of Pa. v. Pa. PUC, 995 A.2d 465, 476 (Pa. Commw. 2010) (alteration in original) (citing Tripps Park v. Pa. PUC, 415 A.2d 967 (Pa. Commw. 1980); Parents United for Better Schools v. School District of Philadelphia, 646 A.2d 689 (Pa. Commw. 1994)).

Members of CAUSE-PA are located throughout Pennsylvania, within each EDCs’ respective service territories, and will be directly affected by the outcome of this proceeding. Particularly, this proceeding will affect the ability of CAUSE-PA members to access energy efficiency programming and to obtain the resultant reduction in home energy costs. See Energy Cons. Council of Pa., 995 A.2d at 476.

this Answer, CAUSE-PA incorporates the facts and arguments set forth in its Comments addressing the Act 129 Phase IV Energy Efficiency and Conservation (EE&C) Program Tentative Implementation Order.³

On Wednesday, April 22, 2020, over a month after the Commission issued its Act 129 Phase IV Tentative Implementation Order⁴ and just three business days before comments were due, IECPA petitioned the Commission seeking a long-term suspension of all Act 129 planning and program activities in light of the COVID-19 pandemic. In its Petition, IECPA requests that the Commission suspend implementation of Phase IV EE&C programs for 270 days, reduce the collection of associated Phase III surcharges by at least 50 percent, and suspend EDC penalties.⁵ Subsequently, answers were filed by other industrial customer groups,⁶ which largely echoed IECPA's arguments. The Office of Consumer Advocate (OCA) also filed an answer in support of suspending the Phase IV planning process, but opposed to reducing the surcharges and penalties.⁷ Additionally, a group of manufacturers, trade associations, large energy consumers, and service providers with a significant Pennsylvania presence and investment interests, submitted a letter in response to the Petition, urging the Commission to support the successful Energy Efficiency and Conservation (EE&C) programs established under Act 129 and opposing any attempts to weaken or suspend these programs.⁸ The letter indicated that as large employers, major energy consumers,

³ See Comments of the Coalition for Affordable Utility Service and Energy Efficiency in Pennsylvania to the Phase IV Tentative Implementation Order, M-2020-3015228, April 27, 2020.

⁴ Act 129 Energy Efficiency and Conservation Program, Phase IV Tentative Implementation Order, Docket No. M-2020-3015228, March 12, 2020 ("TO").

⁵ Petition at 6-7.

⁶ Answer of the Pennsylvania Energy Consumer Alliance, Met-Ed Industrial Users Group, Penelec Industrial Customer Alliance, Philadelphia Area Industrial Energy Users Group, PP&L Industrial Customer Alliance, and West Penn Power Industrial Intervenors (collectively "Industrial Customers"), filed May 5, 2020.

⁷ Answer of the Office of Consumer Advocate (OCA), filed May 5, 2020.

⁸ Joint Letter of AB Energy; Air-Conditioning, Heating, and Refrigeration Institute (AHRI); Capstone Turbine Corporation; Cree Lighting; E-Finity Distributed Generation, LLC; EATON; Energy Management Solutions, Inc.;

and providers of energy products and services, these organizations understand firsthand how Pennsylvania's energy policies affect the cost of doing business and the state's economic competitiveness.⁹ The letter further states that, "All Pennsylvania consumers and businesses benefit when we eliminate energy waste," and that weakening or suspending Act 129 would raise energy costs for everyone and would introduce uncertainties that make it harder for businesses to consider Pennsylvania in long-term investment decisions.¹⁰

CAUSE-PA files this Answer in opposition to IECPA's Petition. CAUSE-PA has been an active participant in prior phases of Act 129 implementation and we are concerned that these proposals would have a detrimental effect on the success of Phase IV, and the ability to serve consumers with relevant and responsive energy efficiency programming at a time that many are most in need. Residential consumers are right now using more energy in their homes than in previous years as they shelter in place to help stop the spread of COVID-19. With many working from home, and schools out for the remainder of the school year, Pennsylvania's families are bearing the brunt of energy costs that are typically shared with employers, government agencies, schools, and businesses as we go about our daily lives. Of course, this increased energy burden is hitting hardest on low and moderate income consumers – many of whom now face unemployment and reduced hours as a result of the pandemic.

Robust and adaptive energy efficiency programming is critically needed to help Pennsylvanians adapt to a new normal. Stalled planning for Phase IV will only delay delivery of

Geisinger; Goshen Mechanical; Integrated CHP Systems Corp.; Legrand; Lutron Electronics; National Association of Energy Service Companies (NAESCO); Sheet Metal and Air Conditioning Contractors' National Association (SMACNA); Sheet Metal and Air Conditioning Contractors' National Association of Western Pennsylvania; Sheet Metal Contractors Association of Philadelphia & Vicinity; and Solar Turbines, May 11, 2020.

⁹ Id.

¹⁰ Id.

critical energy efficiency programs that deliver cost-effective energy savings to energy consumers across the state – including vulnerable Pennsylvanians that are most in need. As explained in greater detail below, CAUSE-PA asserts that IECPA’s Petition must be rejected, and urge the Commission to move forward with its Phase IV Implementation Plan to ensure that critical programming is available without undue delay.

A. The emergent crisis underscores the need for the continuation of low-income energy efficiency and conservation programs.

While the COVID-19 crisis and resultant stay at home orders have created uncertainty in many areas of life, one thing that remains certain is the need for low income EE&C programming to help struggling customers manage their ever increasing energy costs. The short term economic and health impact of the COVID-19 pandemic has been particularly catastrophic for low-income families and communities of color. Indeed, research is starting to reveal a troubling link between poor housing conditions – which has long been considered a strong social determinate of health¹¹ – with disproportionately high mortality rates in low income and minority communities.¹² Access to comprehensive energy efficiency programming is critically important to help mitigate these

¹¹ See, e.g., Thomas Kottke, MD, Access to Affordable Housing Promotes Health and Well-Being and Reduces Hospital Visits, 22 Perm. J. 22: 17-79 (2018), <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC5737920/>; Lauren Taylor, Housing and Health: An Overview of the Literature, HealthAffairs (June 2, 2018), <https://www.healthaffairs.org/doi/10.1377/hpb20180313.396577/full/>.

¹² Xiao Wu & Rachel C. Nethery, Dep’t of Biostatistics, Harvard TH Chan School of Public Health, Exposure to Air Pollution and COVID-19 Mortality in the United States (April 5, 2020), https://projects.iq.harvard.edu/files/covid-pm/files/pm_and_covid_mortality.pdf; Samantha Artiga, Rachel Garfield, Kendal Orgera, Kaiser Family Foundation, Communities of Color at Higher Risk for Health and Economic Challenges Due to COVID-19 (April 7, 2020), <https://www.kff.org/disparities-policy/issue-brief/communities-of-color-at-higher-risk-for-health-and-economic-challenges-due-to-covid-19/>.

troubling impacts, and can help to substantially improve home comfort, housing safety, and associated health outcomes.¹³

Further, while the long term economic impact of the COVID-19 crisis is not yet fully understood, it is likely that many families that were “just getting by” before the pandemic¹⁴ are now unable to make ends meet. With over 1.8 million unemployed Pennsylvanians,¹⁵ and more lay-offs likely to follow in the weeks to come, the need for comprehensive programming for low income communities will only grow. Compounding the loss of income for many of these families is the cost of increased home energy usage from staying home due to the need for social distancing to prevent the spread of the virus and the Governor’s stay at home order.

Now is not the time to eliminate, reduce, or suspend programing that can provide much needed relief and assistance to Pennsylvania households. Quite the opposite, now is the time to ensure that energy efficiency programming remains available to struggling families and businesses to help reduce energy costs and save money. Rather than shut down the planning process for Phase IV, now is the time to sharpen our pencils and get to work planning adaptive energy efficiency programming capable of reducing unnecessary energy usage over the long term – especially for low income households that cannot otherwise afford to invest in energy saving measures. Make no mistake: Care must be taken to ensure that Phase IV programs are designed to meet the challenges of the day – incorporating innovative delivery models that will help protect workers

¹³ ACEEE & Physicians for Social Responsibility, Energy Efficiency and Health, <https://www.aceee.org/sites/default/files/ee-health-1008.pdf>

¹⁴ Board of Governors of the Federal Reserve System, Report on the Economic Well-Being of US Households in 2018 (May 2019), <https://www.federalreserve.gov/publications/files/2018-report-economic-well-being-us-households-201905.pdf> (finding that 40% of households could not afford an unexpected \$400 expense).

¹⁵ Pennlive, The Latest PA Unemployment Compensation Filings Total: 1.8 Million (May 11, 2020), <https://www.pennlive.com/coronavirus/2020/05/the-latest-pa-unemployment-compensation-filings-total-18-million.html>.

and consumers from potential exposure to the COVID-19 virus. However, planning for Phase IV should nevertheless continue, giving a high priority to maximizing the availability of comprehensive efficiency services to low and moderate-income families, more of whom will be struggling to meet their energy burden than were before the pandemic.

B. A long term suspension of Phase IV EE&C planning is not warranted.

In its Petition, IECPA cites to the Commission’s March 20, 2020 Emergency Order as authority to propose a long term suspension of Act 129 Phase IV planning.¹⁶ IECPA proposes, out of hand, a 270 day suspension of programs due to the uncertainty caused by the COVID 19 crisis.¹⁷ The Emergency Order does not support a 270 day suspension of EE&C planning. The Emergency Order indicates that it was meant to address “deadlines or obligations may hinder the public service mission of the Commission and its affected stakeholders.”¹⁸ It specifically indicates, in bold font, that such a suspension, “**shall not exceed ninety (90) days except upon expedited certification of the question by the Chief Administrative Law Judge or Bureau Director to the Commission.**”¹⁹ A broad suspension of EE&C planning would run counter to Act 129’s explicit policy goals of promoting economic growth and ensuring affordable and available electric service and thus does not warrant such expedited certification.²⁰ Indeed, as explained above, the need for

¹⁶ Petition at 1.

¹⁷ Petition at 2.

¹⁸ March 20, 2020 Emergency Order at 2 (emphasis in original).

¹⁹ Emergency Order at 2 (emphasis in original).

²⁰ See Act 129 Energy Efficiency and Conservation Program Phase IV Tentative Implementation Order, M-2020-3015228, March 12, 2020, at 72 n. 99 (hereinafter “TO”):

As the General Assembly declared in its Act 129 policy statement “[i]t is in the public interest to adopt [EE&C] measures and to implement energy procurement requirements designed to ensure that electricity

economic growth and improved energy affordability associated with Phase IV planning and implementation is arguably even more critical now than ever before.

It would be a mistake to completely suspend the planning process for Phase IV Act 129 programming. It is undeniable that many aspects of our economy and our energy usage patterns will change as a result of the deep economic impact of the pandemic response, and those issues should be addressed through the Phase IV planning process. However, we do not yet know the extent of that impact. What we do know is that energy efficiency programming is critically important for low income families who are most profoundly impacted by the economic impact of the pandemic. We also know that energy efficiency is a tremendous economic driver – investing millions of dollars into the economy and creating tens of thousands of good paying jobs across the state.²¹ We therefore know that Act 129 energy efficiency programming will play an important role in restarting our stalled economy and getting Pennsylvanians back to work. Suspending planning for 270 days would be detrimental to the ongoing progress of the Act 129 programs and makes little sense at this time, especially in light of the fact that Phase IV programming will not start for another year.

While the ongoing crisis has affected nearly every aspect of life, including Commission business, the COVID-19 crisis will not last forever. The question is how long. A 270 day suspension is beyond what is necessary at this time to deal with the immediate logistical issues created by the pandemic and far beyond the 90 day extension allowed for in the Commission’s Emergency Order. In the time since the Commission issued its emergency order, Commission

obtained reduces the possibility of electric price instability, promotes economic growth and ensures affordable and available electric service to all residents.

²¹ Energy efficiency in Pennsylvania accounts for over 71,000 jobs – or roughly 2% of statewide employment. ACEEE, US Energy and Employment Report (2020), <https://static1.squarespace.com/static/5a98cf80ec4eb7c5cd928c61/t/5e78184eb0412f11a92684bb/1584928847275/Pennsylvania-2020.pdf>

business, although somewhat altered, has continued. Rate cases and default service proceedings have moved forward, rulemakings have been issued for comment, and stakeholders have filed comments to the Phase IV Tentative Implementation Order. As Pennsylvania has entered its staged reopening, utilities have resumed infrastructure construction and other priority projects. And unfortunately, the current prohibition on utility terminations may expire as soon as June 6 – just under three weeks from the date of this filing. While the future remains uncertain, there is currently insufficient data available to support a conclusion that the current situation will have any long term effect on customers’ energy usage to warrant a dramatic reshaping of Phase IV savings targets established at this phase in the proceeding.

In response to this broad call to suspend Act 129 planning, we caution the Commission to take a more measured and calculated approach. The full, long-term economic impact of the COVID-19 crisis and resulting emergency actions by the Governor and the Commission is not yet known or understood, though the immediate economic impact is painfully clear. Unemployment numbers have soared, and 1.8 million workers in Pennsylvania are currently unemployed. Basic living expenses – including electricity costs – have increased dramatically for families that now spend all of their time at home, and Pennsylvania’s economically vulnerable households are experiencing food insecurity and housing instability on a level not seen or experienced in our lifetime.

As we move through the Phase IV planning process, utilities will be able to make and implement adjustments to programming to account for the new realities of energy efficiency service delivery as a result of the pandemic. But if planning were to cease, the ability to innovate through programming to serve consumers in new and different ways will be stifled – further delaying the adaptation of critical programming to serve emergent needs. Indeed, the established

Act 129 implementation procedures already allow for adjustments to programming and program delivery in response to changes in the economy, energy usage patterns, and emerging technologies. It is unwarranted to prematurely establish a duplicative proceeding to address issues that can reasonably be addressed within the established procedural framework for Phase IV implementation.²²

IECPA's concerns are more appropriately addressed by filing comments and reply comments to the Phase IV TO, and through robust participation in the planning and litigation procedures already incorporated into the Commission's Act 129 implementation process.²³ In addition to participating in the Phase IV implementation proceeding, utilities have the ability to file a Petition with the Commission if they seek to challenge established savings targets. Any interested parties (including IECPA) may intervene to ensure that Phase IV targets are appropriately calculated to deliver *cost beneficial* savings to consumers. Likewise, the utilities must file their proposed Phase IV EE&C plans with the Commission this coming fall, and will be subject to litigation before an Administrative Law Judge who will take evidence from interested parties to assess the utilities' program plans.

CAUSE-PA believes that this robust planning process already provides ample opportunity for the parties – including IECPA – to play an active role in shaping appropriately designed energy efficiency programming that serves the needs of all consumers. Suspension of this process is, thus, neither warranted nor supported at this time.

²² TO at 39-47.

²³ Id.

C. Reducing the Phase III surcharges is not appropriate at this time.

In its Petition, IECPA proposes a 50% reduction in surcharges due to the uncertainty surrounding the current economic crisis.²⁴ CAUSE-PA asserts that this proposed reduction lacks any justifiable basis, and is not appropriate at this time. The benefit of maintaining the integrity of energy efficiency and conservation (EE&C) programming, and delivering cost-effective energy efficiency programming to consumers, outweighs the benefit of short-term relief from an associated surcharge. Energy efficiency measures – by definition – must be cost-effective, and are designed to help customers reduce energy usage and, in turn, reduce their energy bills. This type of assistance is vital to low income consumers who struggle to make ends meet even during relatively good economic times. As IECPA acknowledges in its Petition, it could be difficult and more costly to re-institute programs and measures that have been on hiatus for an extended period of time.²⁵ Freezing the programs and planning process, while at the same time substantially reducing funding for the programs, could have a severe and detrimental effect on the long term viability of EE&C programs, causing programs to go dark, workers to be unemployed, and energy savings to be reduced.

CAUSE-PA agrees with the Office of Consumer Advocate (OCA) that the proposed 50% reduction lacks foundation and may not account for projects that are in progress and will be able to be completed or rebates that may have been committed but not yet paid out.²⁶ As such, we

²⁴ Petition at 9.

²⁵ Petition at 9-10.

²⁶ OCA Answer at 3.

agree with OCA that this issue should be addressed when more data is available about what programs can be delivered safely and at what cost.

D. IECPA’s proposal to waive all Phase III penalties should be rejected.

IECPA proposes that the Commission waive all penalties applicable to an EDC’s failure to meet Phase III targets.²⁷ CAUSE-PA asserts that, at this point in time, it is premature to waive all penalties before any EDC has even requested such a waiver. We support the OCA’s recommendation that efforts to deliver programs that can be safely deployed should be continued and that the issue of penalty waivers should be taken up once the results of these efforts are known.²⁸ Many EDCs have already achieved a substantial portion of the applicable consumption reduction targets - and there is still another year left in Phase III. In fact, counsel for CAUSE-PA is aware of several utility efforts to create a pipeline of jobs to allow them to quickly ramp up job production as soon as it is safe to do so. It is therefore premature to suspend all penalties before any EDC has even requested a waiver and while it seems likely that several EDCs will achieve their targets - despite the challenging circumstances associated with the pandemic.

E. Conclusion

For the reasons set forth above, CAUSE-PA respectfully requests that the Commission deny IECPA’s petition and address the issues contained therein when they are ripe for discussion through the course of the established Phase IV planning process. Making wholesale changes to the

²⁷ Petition at 11-13.

²⁸ OCA Answer at 3-4.

Act 129 implementation process and instituting a long-term suspension of Phase IV planning will have a detrimental impact on EE&C programs, Pennsylvania energy consumers, and our communities as a whole and, thus, is unwarranted at this time. As such, IECPA's Petition should be denied and the issues raised therein should be addressed within the existing regulatory construct.

Respectfully submitted,

PENNSYLVANIA UTILITY LAW PROJECT

Counsel for CAUSE-PA



John W. Sweet, Esq. PA ID: 320182
Elizabeth R. Marx, Esq., PA ID: 309014
Ria M. Pereira, Esq., PA ID: 316771
118 Locust Street
Harrisburg, PA 17101
Tel.: 717-236-9486
Fax: 717-233-4088

May 12, 2020

pulp@palegalaid.net

Verification

I, John W. Sweet, counsel for the Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania (CAUSE-PA), hereby state that the facts contained in the foregoing **Answer of CAUSE-PA** 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).



John W. Sweet, Esq.
Counsel for CAUSE-PA

Date: May 12, 2020

Re: Petition of Industrial Energy Consumers of Pennsylvania : **P-2020-3019562**
to Suspend Implementation of Act 129 Phase IV : **M-2020-3015228**
Requirements and Request for Other Relief : **M-2020-3019262**

Certificate of Service

I hereby certify that I have this day served copies of the **Answer of the Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania (CAUSE-PA)** upon the parties of record in accordance with the requirements of 52 Pa. Code § 1.54 and consistent with the Commission's March 20 Emergency Order at Docket M-2020-3019262.

VIA EMAIL

Derrick Price Williamson, Esq.
Barry A. Naum, Esq.
Spilman, Thomas, & Battle PLLC
1100 Bent Creek Boulevard, Suite 101
Mechanicsburg, PA 17050
dwilliamson@spilmanlaw.com
bnaum@spilmanlaw.com

John R. Evans, Small Business Advocate
Steven C. Gray, Esq.
Sharon E. Webb, Esq.
Office of Small Business Advocate
555 Walnut Street
1st Floor, Forum Place
Harrisburg, PA 17101-1923
jorevan@pa.gov
sgray@pa.gov
swebb@pa.gov

Richard A. Kanaskie, Esq.
Allison Kaster, Esq.
Bureau of Investigation and Enforcement
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Fl.
Harrisburg, PA 17120
rkanaskie@pa.gov
akaster@pa.gov

Pamela C. Polacek, Esq.
Susan E. Bruce, Esq.
Charis Mincavage, Esq.
Adeolu A. Bakare, Esq.
Kenneth R. Stark, Esq.
Jo-Anne Thompson, Esq.
McNees Wallace & Nurick, LLC
100 Pine Street
PO Box 1166
Harrisburg, PA 17108-1166
ppolacek@mcneeslaw.com
sbruce@mcneeslaw.com
cmincavage@mcneeslaw.com
abakare@mcneeslaw.com
kstark@mcneeslaw.com
jthompson@mcneeslaw.com

Terrance J. Fitzpatrick
Donna M. J. Clark, Esq.
Energy Association of Pennsylvania (EAP)
800 North 3rd Street, Suite 205
Harrisburg, PA 17102
tfitzpatrick@energypa.org
dclark@energypa.org

Darryl A. Lawrence, Esq.
Office of Consumer Advocate
555 Walnut Street
5th Floor, Forum Place
Harrisburg, PA 17101-1923
dlawrence@paoca.org

Brianna Esteves
Ceres
99 Chauncy Street, 6th Floor
Boston, MA 02111
esteves@ceres.org

Respectfully submitted,
PENNSYLVANIA UTILITY LAW PROJECT
Counsel for CAUSE-PA



John W. Sweet, Esq.
118 Locust Street
Harrisburg, PA 17101
jsweetpulp@palegalaid.net

May 12, 2020