

CAPTION SHEET

CASE MANAGEMENT SYSTEM

1. REPORT DATE: 00/00/00  
 2. BUREAU: ALJ  
 3. SECTION(S):  
 5. APPROVED BY:  
 DIRECTOR:  
 SUPERVISOR:  
 6. PERSON IN CHARGE:  
 8. DOCKET NO: C-00981142

:  
 :  
 4. PUBLIC MEETING DATE:  
 00/00/00  
 :  
 :  
 :  
 7. DATE FILED: 01/16/98  
 9. EFFECTIVE DATE: 00/00/00

PARTY/COMPLAINANT: TIFFANY ASSOCIATES

RESPONDENT/APPLICANT: DUQUESNE LIGHT COMPANY

COMP/APP COUNTY: ALLEGHENY

UTILITY CODE: 110150

ALLEGATION OR SUBJECT

COMPLAINANT WOULD LIKE DUQUESNE LIGHT TO MAIN METER THE PROPERTY TO REALIZE VOLUME DISCOUNTS FOR ELECTRIC USE THAT WOULD BENEFIT THE BUILDING AND THE TENANTS SINCE IT IS APARTMENTS FOR SENIOR CITIZENS.

**DOCUMENT  
FOLDER**

**DOCKETED**  
JAN 22 1998

BTL

FORMAL COMPLAINT FORM  
Pennsylvania Public Utility Commission

Please Print:

ORIGINAL C-00981148  
110150

1. Your Name, Mailing Address and Telephone Number

Name CLARENCE STEINER FOR TIFFANY ASSOCIATES  
Street/P.O. Box 121 EDGEWOOD AVE. Apt#   
City PITTSBURGH State PA Zip 15218  
County ALLEGHENY Home Telephone-Area Code (412) 242 2330  
Work Telephone-Area Code (412) 242 0273

2. Which company does your complaint concern?

Name of Company DUQUESNE LIGHT CO.

3. What is your complaint?

SEE ATTACHED <sup>MENT</sup>

027944

DOCKETED

JAN 22 1998

RECEIVED  
PITTSBURGH  
JAN 16 1998  
9:29 AM  
UTILITY DIVISION OFFICE

DOCUMENT  
FOLDER

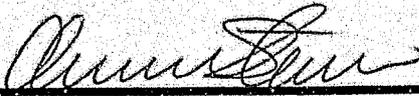
(If you need more space use additional paper and attach to this form).

SEE ATTACHMENT.

(If you need more space use additional paper and attach to this form).

**5. You must sign and date your complaint.**

The information I have placed on this form is true and correct to the best of my knowledge. I understand that I could be punished under Pennsylvania State Law if I purposely give false information.



PRESIDENT, TIFFANY GP, INC.  
GENERAL PARTNER - TIFFANY ASSOCIATES

1/13

Signature of complaining person, or officer

Date Signed

(if customer is a corporation, trust or association) or member (if customer is a partnership). Make sure the complaint form with your original signature is one of the copies you return to the Commission.

**6. If you are represented by a lawyer you must provide your lawyer's name, and telephone number.**

Lawyer's Name \_\_\_\_\_

Street \_\_\_\_\_

City \_\_\_\_\_

State \_\_\_\_\_

Zip \_\_\_\_\_

Telephone Number-Area Code (\_\_\_\_) \_\_\_\_\_

Attachment to Formal Complaint to the PUC for Tiffany Associates

3. Duquesne Light Co. will not permit us to "main meter, or master meter" the apartment building at 925 California Avenue, Avalon, PA 15202. (See enclosed correspondence between DLCO and Tiffany Associates).

We purchased the building on January 9, 1998. Part of our plan of purchase was to convert the building to a main metered building to realize volume discounts and to make the building more attractive to potential renters. The building is a seniors building with over 80 percent of the units occupied by senior citizens. Seniors on fixed incomes prefer to know exactly what their housing costs will be each month and prefer having all utilities included in their monthly rental payment.

With the coming of electric deregulation we would like to be in a position to realize energy cost savings for the building and our tenants.

In refusing our request to change the service Duquesne Light Co. (hereafter DLCO) cited Rule 41 of the Duquesne Light Tariff prohibiting master metering of residential apartment buildings built (or connected) after 1981. According to the DLCO representative the Rule 41 was created in 1981 during the tail end of the energy crisis ostensibly to discourage excessive electric usage from tenants who had no fiscal interest in controlling energy costs. This logic is no longer valid. Public awareness for energy conservation is much more advanced than the cheap energy days of 1981 and earlier. Actual experience in our office shows that main metered buildings do not use more electric than non-main metered buildings. As evidenced by DLCO's letter of January 2, 1998, they are refusing our request solely on the basis of this outdated Rule.

The practical effect of Rule 41 is to charge consumers more for electric usage, which perhaps is the motivation for Rule 41 in the first instance; each individually metered apartment is charged a fixed monthly fee regardless of amount of usage; thus someone who uses a minimum of energy actually pays more per KWH than someone using a greater volume of electricity.

With a main metered building, with volume use discount, we will be able to offer savings to current tenants by reducing their total rental amount to less than their current rent and budget electric bill.

The Tiffany Apartments was constructed around 1965. Rule 41 prohibits main metering for buildings "connected" after 1981. Tiffany apartments was connected when it was built, we propose only to alter the existing service from separately metered units, which make our units less attractive on the rental market, to a master meter, which appeals to people on fixed income. As the term "connected" is not clearly defined, we would argue that we are grandfathered and are exempt from its strictures.

4. We are requesting that the PUC either:

- A. Void Rule 41 in the DLCO tariff, or
- B. Grant us an exemption or waiver from the rule based upon
  - i. our grandfathered status, i.e., we were connected in 1965.
  - ii. economic hardship imposed for a senior citizen building

Whatever the reasoning, we ask that the PUC allow us to convert the residential units of the building to a master meter for the reasons discussed in #3.



**Duquesne Light**

411 Seventh Avenue  
P.O. Box 1930  
Pittsburgh, PA 15230-1930

(412) 393-6000

January 2, 1998

Mr. Casey Steiner  
Steiner Realty  
121 Edgewood Avenue  
Pittsburgh, PA 15218

Re: Tiffany Apartments  
Master Metering Request

Dear Mr. Steiner:

I am writing this letter in response to your letter dated November 20, 1997 specifically requesting the master metering of the Tiffany Apartments, in which you intend to purchase.

It certainly has been a pleasure talking with you on the phone regarding this request. Throughout our conversations, I have referenced Rule 41 from the Duquesne Light Company Tariff which prohibits residential master metering. This Rule of our Tariff was the direct result of the Public Utility Commission's Rules and Regulations that became effective July 20, 1984. These regulations comply with the Building Conservation Act 222.

Although we strive to ensure customer satisfaction, we recognize that it is also our responsibility is to operate within the Rules and Regulations of our Tariff. It is for this reason, we cannot honor your request for master metering.

If you have any questions or need additional information regarding this issue, please feel free to call me at (412) 393-6020.

Sincerely,

William C. Zollars  
Account Representative



STEINER REALTY  
121 EDGEWOOD AVENUE  
PITTSBURGH, PENNSYLVANIA 15218

(412) 242-0273  
(412) 242-0287 (FAX)

November 20, 1997

Mr. William Zollars  
Duquesne Light Co.  
411 Seventh Avenue  
Mail Drop 7-899  
Pittsburgh, PA 15219

RE: Tiffany Apartments, main metering request

Dear Bill,

As we discussed on the phone, I have an agreement to purchase the Tiffany Apartments in January 1998. Part of the plan of purchase was to "main meter" the property to realize volume discounts for electric use that would benefit the building and the tenants. In addition, we have found that apartment renters, especially senior citizens, prefer all utilities included as it eliminates the uncertainty of utility costs as well as the hassle of bill paying.

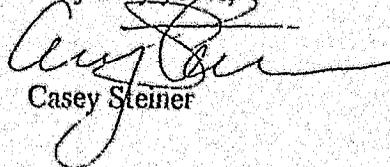
I was rather surprised when I contacted you yesterday and was informed of an archaic rule 41 of the PUC which prohibits the main metering of a building! You mentioned the rule was instituted in 1981 during the energy crisis years under the theory that people conserve more when they are paying directly for electric usage than when the cost of the usage is included in their rent as in "main metered" buildings. As I manage a mix of "main metered" and non main-metered buildings, I do not find strong proof of this theory in practice.

However, the rule does not apply in the case of the Tiffany. The rule states that main metering is prohibited for residential dwelling units connected after 1981. The Tiffany was constructed and "connected" in 1965, thus is exempt from the regulation. I hereby request authorization and assistance to proceed with the main metering of the Tiffany Apartments after closing in January.

The reason I had called yesterday was to find out Duquesne Light's procedure and requirements to proceed. Please let me know what is involved in removing the existing meters, installing a new main meter and any upgrading of service required to complete the job. I would want to coordinate your specifications and requirements with my electrician who would do the work.

If there is any problem with my request please respond in writing to the address above. Thank you for your assistance in this matter.

Very truly yours,

A handwritten signature in cursive script, appearing to read 'Casey Steiner', written over the typed name.

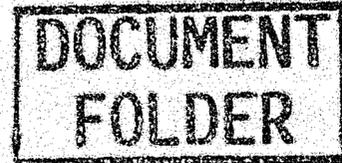
Casey Steiner

COMMONWEALTH OF PENNSYLVANIA  
PENNSYLVANIA PUBLIC UTILITY COMMISSION  
P O BOX 3265, HARRISBURG PA 17105-3265

DATE SERVED: JANUARY 22, 1998

C-00981142

DUQUESNE LIGHT COMPANY  
DAVID MARSHALL  
ONE OXFORD CENTER  
301 GRANT ST  
PITTSBURGH PA 15279



DEAR SIR/MADAM:

A complaint has been filed against you before the Pennsylvania Public Utility Commission by CLARENCE STEINER FOR TIFFANY ASSOCIATES. To defend yourself against the claims stated in the following pages, you must act within twenty (20) days by filing in writing with the Commission, either personally or through your attorney, your defenses or objections to the claims stated against you. Or, you may satisfy the complaint by settling the matter with the Complainant and submitting proof of settlement to the Commission within twenty (20) days.

IF YOU FAIL TO RESPOND WITHIN TWENTY (20) DAYS, THE CASE MAY GO FORWARD IN YOUR ABSENCE AND A JUDGEMENT MAY BE ENTERED AGAINST YOU BY THE COMMISSION WITHOUT FURTHER NOTICE.

CUSTOMER OF A UTILITY

A payment schedule may be prescribed or a termination of utility services may be authorized. You may lose money or property or other rights important to you.

COMPANY/UTILITY

An Administrative Law Judge may revoke or suspend any certificate or permit held by you, or impose a fine, or any other appropriate penalty or remedy authorized by the Public Utility Code. You may lose money or property or other rights important to you.

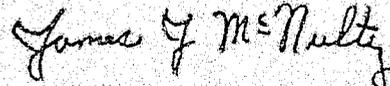
JANUARY 22, 1998

Detailed instructions on how to proceed are contained in the attached pages. You are advised to read them carefully.

Unless you are a corporation or other organization, you may proceed without a lawyer. However, if you want a lawyer and do not have one or cannot afford one, the office listed below can tell you where you can get legal help:

Pennsylvania Lawyer Referral Service  
Pennsylvania Bar Association  
P.O. Box 186  
Harrisburg, PA 17108  
(800) 692-7375

Very truly yours,



James J. McNulty  
Secretary

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

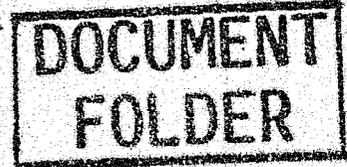
DATE SERVED: JANUARY 22, 1998

CLARENCE STEINER FOR  
TIFFANY ASSOCIATES  
Complainant

vs.

DUQUESNE LIGHT COMPANY  
Respondent

Complaint Docket  
No: C-00981142



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FORMAL COMPLAINT  
NOTICE TO RESPONDENT  
TO ANSWER OR SATISFY

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**DOCKETED**  
JAN 22 1998

TO: DUQUESNE LIGHT COMPANY

TAKE NOTICE:

That a complaint in the above entitled matter, of which the attached is a true and correct copy, has been presented and filed of record with the Pennsylvania Public Utility Commission. Section 702 of the Public Utility Code, 66 Pa. C.S. Section 702, requires the Commission to serve on each party named in a complaint a copy of the complaint and notice calling upon each party to satisfy the complaint, or to answer the same in writing within a specified time; THEREFORE,

1. You have twenty (20) days from the date on which this complaint is served to either satisfy this complaint or to file with the Secretary of the Pennsylvania Public Utility Commission, P. O. Box 3265, Harrisburg, PA 17120, an answer (original and two copies), in writing, under oath, which, as required by Section 5.61 of the Commission's Rules of Practice and Procedure, 52 Pa. Code Section 5.61, either affirms or specifically denies the allegations in this complaint. You must also serve a copy of the answer upon the complainant. The date of service is the mailing date as indicated by the date at the top of this Notice. Section 1.56(a) of the Commission's Rules of Practice and Procedure, 52 Pa. Code Section 1.56(a).

2. If you fail to either satisfy this complaint or to file answer or other responsive pleading within twenty (20) days, you will be deemed to have admitted all the allegations in this complaint in accordance with Section 5.61 of the Commission's Rules of Administrative Practice and Procedure, 52 Pa. Code Section 5.61.

In that event, the Commission may, without hearing, enter an order which either revokes or suspends any certificate or permit held by you or which imposes a fine or any other appropriate penalty or remedy authorized by the Public Utility Code, 66 Pa. C.S. Section 101, et seq.; and, if you are a customer of a utility, an order may be entered which prescribes a payment schedule or which authorizes termination of utility services. The Commission is not limited to the relief sought by the complainant in paragraph 4 of the attached complaint.

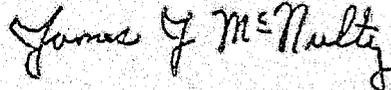
3. If you elect to satisfy this complaint you must file, within twenty (20) days from the date on which this complaint is served, affidavits executed by each complainant that this complaint has been satisfied. Such affidavits must describe the basis on which this complaint was satisfied; any settlement agreement between the parties must be reduced to writing and attached to the affidavit. Such affidavits are to be filed with the Secretary of the Commission at the address set forth in paragraph 1. Upon receipt of affidavits of satisfaction from all complainants, this complaint may be dismissed by the Commission in accordance with Section 703(a) of the Public Utility Code, 66 Pa. C.S. Section 703(a), unless the Commission determines that such dismissal would be contrary to the public interest, in which event the Commission may direct that hearings be held upon the complaint.

4. If you file an answer which admits the allegations in this complaint, or which fails to specifically deny the allegations in this complaint, the Commission may, without hearing, enter an order which either revokes or suspends any certificate held by you or which imposes a fine or any other appropriate penalty or remedy authorized by the Public Utility Code, 66 Pa. C. S. Section 101, et seq.; and, if you are a customer of a utility, an order may be entered which prescribes a payment schedule or which authorizes termination of utility services. The Commission is not limited to the relief sought by the complainant in paragraph 4 of the attached complaint.

5. If you file a timely answer which specifically denies the allegations in this complaint, or which raises material questions of law or fact, this matter shall be referred to the Office of Administrative Law Judge for hearing and decision. If, after hearing on the issues raised by that answer, you are found to have committed any of the violations alleged in the complaint, the Administrative Law Judge may render a decision which either revokes or suspends any certificate or permit held by you or which imposes a fine or any other appropriate penalty or remedy authorized by the

Public Utility Code, 66 Pa. C. S. Section 101, et seq.; and, if you are a customer of a utility, an order may be entered which

prescribes a payment schedule or which authorizes termination of utility services. In the imposition of a penalty after a hearing the Administrative Law Judge is not bound by the relief sought by the complainant in paragraph 4 of the attached complaint.



James J. McNulty  
Secretary

(SEAL)

Certified Mail  
Return Receipt Requested



Duquesne Light Company

ORIGINAL

Legal Unit  
411 Seventh Avenue  
P.O. Box 1930  
Pittsburgh, Pennsylvania 15230-1930  
Phone: (412) 393-6000  
Fax: (412) 393-6645

Writer's DIRECT DIAL Number:

(412) 393-6129

February 17, 1998

RECEIVED

Certificate of Mailing

Prothonotary  
Pennsylvania Public Utility Commission  
P.O. Box 3265  
North Office Building  
Harrisburg, PA 17105-3265

FEB 17 1998  
PA PUBLIC UTILITY COMMISSION  
PROTHONOTARY'S OFFICE

Re: Clarence Steiner for Tiffany Associates  
vs. Duquesne Light Company  
Docket No. C-00981142

Dear Prothonotary:

Enclosed for filing in the above-referenced matter are an original and three copies of the Answer of Duquesne Light Company. A copy of this document has been served upon the Complainant in accordance with Commission rules.

Sincerely,

Richard S. Herskovitz,  
Corporate Attorney

RSH/rms

Enclosures (4)

c: Clarence Steiner (w/enclosure)

BTL

98

DOCUMENT  
FOLDER

Before the  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

**ORIGINAL RECEIVED**

133495

CLARENCE STEINER  
for TIFFANY ASSOCIATES

vs.

DUQUESNE LIGHT COMPANY

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Docket No. ~~PA 90880~~ PUBLIC UTILITY COMMISSION  
PROTHONOTARY'S OFFICE

RECEIVED  
FEB 17 1998

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ANSWER OF DUQUESNE LIGHT COMPANY

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TO THE HONORABLE COMMISSION:

AND NOW comes the Respondent, Duquesne Light Company ("Duquesne"), by and through its attorney, Richard S. Herskovitz, and files the within Answer of which the following is a statement:

1. Admitted.
2. Admitted.
3. Admitted in part and denied in part.

In that the caption of said complaint lists only Clarence Steiner as the Complainant, it is not clear who, other than himself, is meant by "we," "us," and "our," which are contained throughout the Complaint. Therefore, Duquesne's response will be directed only to one individual, Clarence Steiner ("Complainant").

3.1. It is admitted that Duquesne will not permit Complainant to "main meter, or master meter" the apartment building at 925 California Avenue, Avalon, PA 15202. By way of further response, to master meter an apartment means that there is

**DOCUMENT FOLDER**

**DOCKETED**  
FEB 19 1998

only one electric meter which services all of the residential units collectively, rather than having each residential unit connected to a separate meter.

With regard to the correspondence attached to the Complaint, Duquesne admits to the authenticity of the letter dated January 2, 1998, from William C. Zollars, Account Representative of Duquesne, addressed to Mr. Casey Steiner. Duquesne also admits to receipt of the letter dated November 20, 1997, from Clarence Steiner addressed to Mr. Zollars of Duquesne. However, Duquesne denies the averments contained therein on the grounds that Duquesne is without sufficient knowledge or information to form a belief as to the truth of those averments. As for the averments in the letter referring to the applicability of Rule 41, those averments are denied on the grounds that the Rule is applicable.

3.2. After reasonable investigation, Duquesne is without sufficient knowledge or information to form a belief as to the truth of Complainant's averments that he purchased the building on January 9, 1998; that part of his plan of purchase was to convert the building to a main metered building; that the reason for the meter conversion was to "realize volume discounts and to make the building more attractive to potential renters;" that said building is a seniors' building that has over 80% of the units occupied by senior citizens; and that "[s]eniors on fixed incomes prefer to know exactly what their housing costs will be each month and prefer

having all utilities included in their monthly rental payment," and these averments are therefore denied.

3.3. After reasonable investigation, Duquesne is without sufficient knowledge or information to form a belief as to the truth of Complainant's averment that, "[w]ith the coming of electric deregulation we would like to be in a position to realize energy cost savings for the building and our tenants," and this averment is therefore denied.

3.4. It is admitted that Duquesne refused to honor Complainant's request to master meter the apartment building based upon Rule 41 of Duquesne's Tariff. It is admitted that Rule 41 prohibits master metering of residential apartment buildings that were built (or had their electric service connected) after 1981. It is admitted that Duquesne's representative had informed Complainant that "Rule 41 was created in 1981 during the tail end of the energy crisis ostensibly (sic) to discourage excessive electric usage from tenants who had no fiscal interest in controlling energy costs."

Complainant's averment that "[t]his logic is no longer valid," is a legal conclusion, to which no response is required.

After reasonable investigation, Duquesne is without sufficient knowledge or information to form a belief as to the truth of Complainant's averments that "[p]ublic awareness for energy conservation is much more advanced than the cheap energy days of 1981 and earlier," and that "experience in [Complainant's] office

shows that main metered buildings do not use more electric than non-main metered buildings," and these averments are therefore denied.

It is admitted that Duquesne is refusing Complainant's request based solely on Rule 41. It is denied that the Rule is outdated. By way of further response, Rule 41 was enacted pursuant to the standards established in the Public Utility Regulatory Policies Act (16 USCS §§2601, et seq.) and was approved by the Commission. The Rule promotes energy conservation and eliminates subsidization of high electric consumption customers by low consumption customers.

Complainant's averment that "[t]he practical effect of Rule 41 is to charge consumers more for electric usage," and that this "perhaps is the motivation for Rule 41 in the first instance," is denied for the reasons set forth in the preceding paragraph.

It is admitted that "each individually metered apartment is charged a fixed monthly fee regardless of amount of usage." This fee is the customer charge and is in addition to the energy charge which is the charge per KWH.

Complainant's averment that "[s]omeone who uses a minimum of energy pays more per KWH than someone using a greater (sic) volume of electricity," is admitted for customers billed under Duquesne's Rate RS - Residential Service.

3.5. Complainant's averment that "[w]ith a main metered building, with volume use discount, we will be able to offer savings to current tenants by reducing their total rental amount to less

than their current rent and budget electric bill," is denied. Duquesne is without knowledge or information sufficient to form a belief as to the truth of this averment.

After reasonable investigation, Duquesne is without sufficient knowledge or information to form a belief as to the truth of Complainant's averment that Tiffany Apartments was constructed around 1965, and this averment is therefore denied.

It is admitted that said Rule 41 prohibits main (master) metering of buildings connected after 1981. By way of further answer, only master metered apartment buildings that had their electric service connected prior to 1981 are "grandfathered," i.e. exempt from the Rule 41 prohibition.

After reasonable investigation, Duquesne is without sufficient knowledge or information to form a belief as to the truth of Complainant's averment that Tiffany apartments was connected when it was built and this averment is therefore denied.

After reasonable investigation, Duquesne is without sufficient knowledge or information to form a belief as to the truth of Complainant's averment that separately metered units, such as his, are less attractive on the rental market, and that master metering appeals to people on fixed income, and these averments are therefore denied.

Complainant's averment that he is "grandfathered" and exempt from Rule 41 is denied. On the contrary, only buildings that were

master metered prior to 1981 are "grandfathered" and therefore exempt from Rule 41. Buildings with dwelling units that were individually metered before 1981 must remain individually metered.

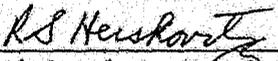
4. This paragraph contains requests for relief, to which no response is required.

WHEREFORE, Duquesne requests that after reasonable investigation and hearing the Complaint be dismissed.

Respectfully submitted:

DUQUESNE LIGHT COMPANY

By Counsel:

  
Richard S. Herskovitz  
Corporate Attorney  
411 Seventh Avenue, 16-006  
Box 1930  
Pittsburgh, PA 15230-1930  
(412) 393-6129  
FAX (412) 393-6645



Before the  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

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FEB 17 1998

PA PUBLIC UTILITY COMMISSION  
PROTHONOTARY'S OFFICE

CLARENCE STEINER,  
for TIFFANY ASSOCIATES

133496

vs.

Docket No.

DUQUESNE LIGHT COMPANY

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the foregoing document upon the participants listed below in accordance with the requirements of 52 PA. Code § 1.54 (relating to service by a participant).

Clarence Steiner  
121 Edgewood Avenue  
Pittsburgh, PA 15218

Dated this 17th day of February, 1998.

Richard S. Herskovitz  
Richard S. Herskovitz  
Counsel for:  
Duquesne Light Company  
411 Seventh Avenue, 16-006  
Box 1930  
Pittsburgh, Pa 15230-1930  
(412) 393-6129  
FAX (412) 393-6645



COMMONWEALTH OF PENNSYLVANIA  
PENNSYLVANIA PUBLIC UTILITY COMMISSION  
P.O. BOX 3265, HARRISBURG, PA 17105-3265

IN REPLY PLEASE  
REFER TO OUR FILE

March 19, 1998

In Re: C-00981142

(See attached list)

**Tiffany Associates v. Duquesne Light Company**

Complainant would like Duquesne Light to main meter the property to realize volume discounts for electric use that would benefit the building and the tenants since it is apartments for senior citizens.

Hearing Notice

This is to inform you that a hearing on the above-captioned case will be held as follows:

Type: Initial

Date: Tuesday, May 12, 1998

Time: 10:00 a.m.

Location: 11th floor hearing room  
Pittsburgh State Office Building  
300 Liberty Avenue  
Pittsburgh, Pennsylvania

Presiding Officer: Administrative Law Judge Larry Gesoff  
1103 Pittsburgh State Office Building  
300 Liberty Avenue  
Pittsburgh, PA 15222  
Telephone: (412) 565-3550

137095

Attention: You may lose the case if you do not come to this hearing and present facts on the issues raised.

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FOLDER

DOCKETED

MAR 23 1998

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PROSECUTIVE OFFICE

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If you intend to file exhibits, 2 copies of all hearing exhibits to be presented into evidence must be submitted to the reporter. An additional copy must be furnished to the Presiding Officer. A copy must also be provided to each party of record.

Except for those individuals representing themselves, the Commission's rules require that all parties have an attorney; therefore, you should have an attorney of your choice file an entry of appearance before the scheduled hearing.

If you are a person with a disability, and you wish to attend the hearing, we may be able to make arrangements for your special needs. Please call Norma Lewis at the Public Utility Commission:

- Scheduling Office: 717-787-1399
- AT&T Relay Service number for persons who are deaf or hearing impaired: 1-800-654-5988.

pc: Judge Gesoff  
Norma Lewis  
Judy E. Weaver, Scheduling Officer  
Beth Plantz  
Docket Section  
Calendar File