



Dennis A. Whitaker
Office: 717 236-1300 x226
Direct: 717 703-0805
dawhitaker@hmslegal.com

Todd S. Stewart
Office: 717 236-1300 x242
Direct: 717 703-0806
tsstewart@hmslegal.com

Kevin J. McKeon
Office: 717 236-1300 x235
Direct: 717 703-0801
kjmckeon@hmslegal.com

Bryce R. Beard
Office: 717 236-1300 x248
Direct: 717 703-0808
brbeard@hmslegal.com

100 North Tenth Street, Harrisburg, PA 17101 Phone: 717.236.1300 Fax: 717.236.4841 www.hmslegal.com

January 25, 2022

VIA ELECTRONIC MAIL
mguhl@pa.gov

Administrative Law Judge Marta Guhl
Pennsylvania Public Utility Commission
Office of Administrative Law Judge
801 Market Street, Suite 4063
Philadelphia, PA 19107

Re: Grays Ferry Cogeneration Partnership and Vicinity Energy Philadelphia, Inc. v.
Philadelphia Gas Works; Docket No. C-2021-3029259; **UNOPPOSED MOTION
FOR PROTECTIVE ORDER**

Dear Judge Guhl:

Enclosed you will find Grays Ferry Cogeneration Partnership and Vicinity Energy Philadelphia, Inc.'s Unopposed Motion for Protective Order in the above-captioned proceeding.

Copies have been served in accordance with the attached Certificate of Service. Should you have any questions, please feel free to contact me directly.

Very truly yours,

Dennis A. Whitaker, Esq.
Kevin J. McKeon, Esq.
Todd S. Stewart, Esq.
Bryce R. Beard, Esq.

Counsel for
Grays Ferry Cogeneration Partnership and
Vicinity Energy Philadelphia, Inc.

BRB/jld

Enclosures

cc: Rosemary Chiavetta, Secretary (via electronic filing)
Athena Delvillar, Legal Assistant (via electronic mail – sdelvillar@pa.gov)
Per Certificate of Service

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Grays Ferry Cogeneration Partnership and	:	
Vicinity Energy Philadelphia, Inc.	:	
Complainants,	:	
	:	Docket No. C-2021-3029259
v.	:	
	:	
Philadelphia Gas Works,	:	
Respondent.	:	

**UNOPPOSED MOTION
OF GRAYS FERRY COGENERATION PARTNERSHIP
AND VICINITY ENERGY PHILADELPHIA, INC.
FOR A PROTECTIVE ORDER**

TO ADMINISTRATIVE LAW JUDGE MARTA GUHL:

Grays Ferry Cogeneration Partnership and Vicinity Energy Philadelphia, Inc., by and through its attorneys, Hawke McKeon & Sniscak LLP, hereby requests that the attached Protective Order be entered in the above-captioned proceedings pursuant to the provisions of 52 Pa. Code § 5.365(a). The attached Protective Order was previously circulated to all active parties to the proceeding (collectively referred to as “Parties”). No Party opposes the proposed Protective Order. In support thereof, Vicinity represents as follows:

1. Grays Ferry Cogeneration Partnership and Vicinity Energy Philadelphia, Inc (collectively “Vicinity” or “Complainants”) jointly filed a complaint against the Philadelphia Gas Works (“PGW”) on October 22, 2021. The Complaint was served by the Commission’s Secretary on November 1, 2021.

2. On November 8, 2021, Vicinity served Interrogatories and Requests for Production of Documents, Set I, on PGW.
3. On November 18, 2021, PGW served Objections to Vicinity's Set I Interrogatories and Requests for Production of Documents.
4. Also on November 18, 2021, the Office of Consumer Advocate ("OCA") filed its Notice of Intervention and Public Statement.
5. On November 22, 2021, PGW filed its Answer to the Complaint with New Matter, Preliminary Objections to the Complaint and a Motion to Stay Discovery.
6. On November 23, 2021, Vicinity filed a Motion to Dismiss PGW's Objections and to Compel PGW to respond to its Set I Interrogatories and Requests for Production of Documents.
7. On November 29, 2021, PGW filed its Answer to Vicinity's Motion to Compel.
8. On December 2, 2021, Vicinity filed its Answer to Vicinity's Preliminary Objections
9. On December 5, 2021, The Office of Small Business Advocate ("OSBA") filed its Notice of Intervention and Public Statement.
10. On December 7, 2021, The Commission's Bureau of Investigation and Enforcement (I&E") filed the Notice of Appearance for Gina Miller, Esq.
11. On December 13, 2021, Vicinity filed its Answer to New Matter and its Answer to PGW's Motion to Stay Discovery.
12. The proceeding has been assigned to Administrative Law Judge Marta Guhl (the "ALJ" or "ALJ Guhl") for hearings and issuance of an Initial Decision.

13. A prehearing conference was held on January 13, 2022, at which time a litigation schedule was established and other procedural aspects were addressed. In addition, ALJ Guhl indicated that the Preliminary Objections filed by PGW would be denied by Order forthcoming, and the parties therefore agreed to move forward with the outstanding discovery.

14. The Parties to this proceeding have and will continue to engage in discovery in this matter. As such, ALJ Guhl requested at the Prehearing Conference that Vicinity file a Motion for Protective Order. This Motion follows.

15. Proprietary Information within the definition of 52 Pa. Code § 5.365 has been and will be requested in discovery during the course of this proceeding. Some of this information has may be included in the testimony of certain Parties, which justifies the issuance of a Protective Order. Parties may also desire to use confidential or proprietary information for cross-examination purposes. Treatment of such information as set forth in the attached proposed Protective Order is justified because unrestricted disclosure of this information would not be in the public interest. These considerations constitute cause for the restrictions specified in 52 Pa. Code § 5.365 and in Administrative Law Judge or Commission Orders granting relief pursuant to said regulation.

16. Under 52 Pa. Code §§ 5.362(a)(7) and 5.365, the Administrative Law Judge or the Commission may issue a Protective Order to limit or prohibit disclosure of confidential commercial information where the potential harm to a participant would be substantial and outweighs the public's interest in having access to the confidential information. In applying this standard, relevant factors to be considered include: the extent to which disclosure would cause unfair economic or competitive damage; the extent to which the information may already be known by others; and the potential value of such information to the participant and the participant's competitors and trade partners. 52 Pa. Code §§ 5.365(a)(1) – (3).

17. The documents sought to be protected by the Proposed Order also contain proprietary information as described in 66 Pa.C.S. § 335(d), which provides:

if a document contains trade secrets or proprietary information and it has been determined by the commission that harm to the person claiming the privilege would be substantial or if a document required to be released under this section contains identifying information which would operate to the prejudice or impairment of a person's reputation or personal security, or information that would lead to the disclosure of a confidential source or subject a person to potential economic retaliation as a result of their cooperation with a commission investigation, or information which, if disclosed to the public, could be used for criminal or terroristic purposes, the identifying information may be expurgated from the copy of the document made part of the public record.

Therefore, treatment of such information as set forth in the attached proposed Protective Order is justified under 66 Pa.C.S. § 335(d).

18. Moreover, the Commission has an affirmative duty to protect from release Confidential Security Information, which is not subject to disclosure to third parties under the provisions and procedures specified in The Public Utility Confidential Security Information Disclosure Protection Act (35 P.S. §§ 2141.1 to 2141.6) and the PUC's regulations implementing such Act at 52 Pa. Code §§ 102.1 – 102.4.

19. The attached proposed Protective Order defines three categories of protected information. The first is "CONFIDENTIAL" information in Paragraph 3 as "those materials which customarily are treated by that Party as sensitive or proprietary, which are not available to the public, and which, if disclosed freely, would subject that Party or its clients to risk of competitive disadvantage or other business injury." Clearly, protecting this type of information from disclosure is appropriate. The second is "HIGHLY CONFIDENTIAL," which is also defined in Paragraph 3 of the attached proposed Protective Order as "those materials that are of such a commercially sensitive nature among the parties; or of such a private, personal nature that the producing party is able to justify a heightened level of confidential protection with respect to those

materials.” The third category is “CONFIDENTIAL SECURITY INFORMATION” which is defined as “Confidential Security Information pursuant to the Public Utility Confidential Security Information Disclosure Protection Act (35 P.S. §§ 2141.1 to 2141.6).”

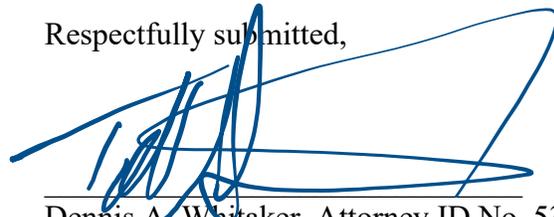
20. Limitation on the disclosure of “CONFIDENTIAL,” “HIGHLY CONFIDENTIAL”, or “CONFIDENTIAL SECURITY INFORMATION” information will not prejudice the rights of the participants, nor will such limitation frustrate the prompt and fair resolution of this proceeding. The proposed Protective Order balances the interests of the Parties, the public, and the Commission.

21. Vicinity has included Paragraph 8 of the attached Order to preserve the ALJ’s and the Commission’s rights to allow persons, other than those who otherwise fit within the terms of the Order, to review Proprietary Information.

22. The attached proposed Protective Order will protect the CONFIDENTIAL, HIGHLY CONFIDENTIAL, and CONFIDENTIAL SECURITY INFORMATION materials while allowing the Parties to use such information for purposes of the instant litigation.

WHEREFORE, for all the foregoing reasons, Grays Ferry Cogeneration Partnership and Vicinity Energy Philadelphia, Inc. requests that Administrative Law Judge Marta Guhl grant this Motion and issue the attached Protective Order.

Respectfully submitted,



Dennis A. Whitaker, Attorney ID No. 53975
Kevin J. McKeon, Attorney ID No. 30428
Todd S. Stewart, Attorney ID No. 75556
Bryce R. Beard, Attorney ID No. 325837
Hawke McKeon & Sniscak LLP
100 N 10th Street
Harrisburg, PA 17101
(717) 236-1300
(717) 236-4841 (fax)
dawhitaker@hmslegal.com
kjmckeon@hmslegal.com
tsstewart@hmslegal.com
brbeard@hmslegal.com

*Counsel for
Grays Ferry Cogeneration Partnership and
Vicinity Energy Philadelphia, Inc.*

Dated: January 25, 2022

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Grays Ferry Cogeneration Partnership and	:	
Vicinity Energy Philadelphia, Inc.	:	
Complainants,	:	
	:	Docket No. C-2021-3029259
v.	:	
	:	
Philadelphia Gas Works,	:	
Respondent.	:	

PROTECTIVE ORDER

Upon consideration of the Unopposed Motion for a Protective Order that was filed by Grays Ferry Cogeneration Partnership and Vicinity Energy Philadelphia, Inc. on January 25, 2022;

IT IS ORDERED THAT:

1. The Protective Order is hereby granted with respect to the material and information identified in Paragraphs 2 and 3 below, which have been or will be filed with the Commission, have been or will be disclosed in discovery, or otherwise presented during the above-captioned proceeding and all proceedings consolidated therewith. All persons previously or hereafter granted access to the materials and information identified in Ordering Paragraphs 2 and 3 of this Protective Order shall use and disclose such information only in accordance with this Protective Order.

2. The material or information subject to this Protective Order includes all correspondence, documents, data, information, studies, methodologies and other materials furnished in discovery in this proceeding, as well as written and oral testimony, exhibits, examination and cross-examination questions, motions, briefs, oral argument and other writings that may be filed by various witnesses and parties that contains Proprietary Information. To the extent any Proprietary Information is filed with the Commission or presented in this proceeding, such information shall also be subject to this Protective Order.

3. “CONFIDENTIAL” materials are those materials which customarily are treated by that party as sensitive or proprietary, which are not available to the public, and which, if disclosed freely, would subject that party or its clients to risk of competitive disadvantage or other business injury.

“HIGHLY CONFIDENTIAL” materials are those materials that are of such a commercially sensitive nature among the parties or of such a private, personal nature that the producing party is able to justify a heightened level of confidential protection with respect to those materials. For example but without limitation, “HIGHLY CONFIDENTIAL” information may include Proprietary Information that constitutes or describes: (i) customer names or customers’ prospects’ names, addresses, annual usage, or other customer-identifying information; (ii) competitive strategies or service alternatives; (iii) competitive pricing or discounting information; and (iv) marketing materials that have not yet been used.

“CONFIDENTIAL SECURITY INFORMATION” materials are those deemed Confidential Security Information pursuant to the Public Utility Confidential Security Information Disclosure Protection Act (35 P.S. §§ 2141.1 to 2141.6). Moreover, information subject to protection under the Public Utility Confidential Security Information Disclosure Protection Act (35 P.S. §§ 2141.1 to 2141.6) and PUC Regulations at 52 Pa. Code §§ 102.1-102.4 will also be designated as “CONFIDENTIAL SECURITY INFORMATION.” Pursuant to the Commission’s rules regarding the handling of Confidential Security Information, no information subject to protection under the Public Utility Confidential Security Information Disclosure Protection Act (35 P.S. §§ 2141.1 to 2141.6) and PUC Regulations at 52 Pa. Code §§ 102.1-102.4 will be provided electronically to the Commission, Administrative Law Judge, Secretary’s Bureau, or any other Commission staff, and such information must be filed with the Commission in hard copy only.

Together, these CONFIDENTIAL, HIGHLY CONFIDENTIAL, and CONFIDENTIAL SECURITY INFORMATION materials will be referred to as “Proprietary Information” for the purposes of this Protective Order.

The parties shall designate data or documents as constituting or containing Proprietary Information by stamping or marking the documents “CONFIDENTIAL” or “HIGHLY CONFIDENTIAL” or “CONFIDENTIAL SECURITY INFORMATION” protected material. Where only part of data compilations or multi-page documents constitutes or contains Proprietary Information, the parties, insofar as reasonably practicable within discovery and other time constraints imposed in this proceeding, shall designate only the specific data or pages of documents which constitute or contain Proprietary Information.

4. Proprietary Information shall be made available to counsel for a party who has entered an appearance in this proceeding and does not have responsibilities constituting a Restricted Party for the nonproducing Party, subject to the terms of this Protective Order. Such counsel shall use or disclose the Proprietary Information only for purposes of preparing or presenting evidence, cross examination or argument in this proceeding.

5. In addition, information deemed as “CONFIDENTIAL” material shall be made available to a “Reviewing Representative” who is a person who has signed a Non-Disclosure Certificate and is:

- (i) An attorney for a public advocate pursuant to 52 Pa. Code § 1.18 or an attorney who has formally entered an appearance in this proceeding on behalf of a party;
- (ii) An attorney, paralegal, or other employee associated for purposes of this proceeding with an attorney described in (i) above;
- (iii) An expert or an employee of an expert retained by a party for the purpose of advising, preparing for or testifying in this proceeding; or

- (iv) Employees or other representatives of a party appearing in this proceeding with significant responsibility for this docket.

Information deemed as “HIGHLY CONFIDENTIAL” and “CONFIDENTIAL SECURITY INFORMATION” material may be provided to a “Reviewing Representative” who is a person who has signed a Non-Disclosure Certificate and is:

- (i) An attorney for a public advocate pursuant to 52 Pa. Code § 1.18 or an attorney who has formally entered an appearance in this proceeding on behalf of a party’
- (ii) An attorney, paralegal, or other employee associated for purposes of this proceeding with an attorney described in (i) above;
- (iii) An expert or an employee of an expert retained by a party for the purposes of advising, preparing for or testifying in this proceeding; or
- (iv) A person designated by agreement between the producing party and the non-producing party as a Reviewing Representative for purposes of HIGHLY CONFIDENTIAL and CONFIDENTIAL SECURITY INFORMATION; and who is
- (v) Not a “Restricted Party” as defined in Paragraph 6 of this Protective Order.

A Reviewing Representative shall not be permitted to inspect, participate in discussions regarding, or otherwise be permitted access to Proprietary Information pursuant to this Protective Order unless that Reviewing Representative has first executed a Non-Disclosure Certificate in the form provided in Appendix A, provided, however, that if an attorney or expert qualified as a Reviewing Representative has executed such a certificate, the paralegals, secretarial and clerical personnel under his or her instruction, supervision or control need not do so. A copy of each executed Non-Disclosure Certificate shall be provided to counsel for the party asserting confidentiality prior to disclosure of any Proprietary Information to that Reviewing Representative.

Attorneys and outside experts qualified as Reviewing Representatives are responsible for ensuring that persons under their supervision or control comply with the Protective Order.

A qualified “Reviewing Representative” for “HIGHLY CONFIDENTIAL” and “CONFIDENTIAL SECURITY INFORMATION” material may review and discuss “HIGHLY CONFIDENTIAL” and “CONFIDENTIAL SECURITY INFORMATION” material with their client or with the entity with which they are employed or associated, to the extent that the client or entity is not a “Restricted Person”, but may not share with or permit the client or entity to review the “HIGHLY CONFIDENTIAL” and “CONFIDENTIAL SECURITY INFORMATION” material. Such discussions must be general in nature and not disclose specific “HIGHLY CONFIDENTIAL” or “CONFIDENTIAL SECURITY INFORMATION” information. However, counsel for I&E, OCA, and OSBA may share Proprietary Information with the I&E Director, I&E Deputy Chief Prosecutor, Consumer Advocate, and Small Business Advocate, respectively, without obtaining a Non-Disclosure Certificate from these individuals, provided that these individuals otherwise abide by the terms of this Protective Order.

6. A Reviewing Representative or counsel entering appearance may not be a “Restricted Party.” “Restricted Party” shall mean: (a) an officer, director, stockholder, partner, owner or employee of any competitor of a Party; (b) an officer, director, stockholder, partner, owner or employee of any affiliate of a competitor of a Party (including any association of competitors of a Party); (c) an officer, director, stockholder, owner or employee of a competitor of a customer of a Party if the Proprietary Information concerns a specific identifiable customer of the Party; (d) an officer, director, stockholder, owner or employee of an affiliate of a competitor of a customer of a Party if the Proprietary Information concerns a specific identifiable customer of the Party; provided, however, that no expert shall be disqualified on account of being a stockholder,

partner, or owner unless that expert's interest in the business would provide a significant motive for violation of the limitations of permissible use of the Proprietary Information. For purposes of this Protective Order, stocks, partnership or other ownership interests valued at more than \$10,000 or constituting more than a 1% interest in a business establishes a significant motive for violation.

Regarding the definition of "Restricted Party", all parties agree that employees of the parties who have significant responsibility with the docket and who have properly executed a Non-disclosure certificate shall not be considered a competitor of any other party to this proceeding and shall have access to information deemed CONFIDENTIAL material.

If an expert for a party, another member of the expert's firm or the expert's firm generally also serves as an expert for, or as a consultant or advisor to, a Restricted Person, that expert must: (1) identify for the parties each Restricted Person and all personnel in or associated with the expert's firm that work on behalf of the Restricted Person; (2) take all reasonable steps to segregate those personnel assisting in the expert's participation in this proceeding from those personnel working on behalf of a Restricted Person; and (3) if segregation of such personnel is impractical, the expert shall give to the producing party written assurances that the lack of segregation will in no way adversely affect the interests of the parties or their customers. The parties retain the right to challenge the adequacy of the written assurances that the parties' or their customers' interests will not be adversely affected.

7. The Office of Small Business Advocate's consultant, Mr. Robert D. Knecht, will not be considered to be a "Restricted Person" and Paragraph 6 will not apply to Mr. Knecht, provided that Mr. Knecht does not share, distribute, or discuss the Proprietary Information with any person except authorized OSBA representatives.

8. Other than persons described in Paragraphs 4, 5, 7 and 9, no other person may have access to the Proprietary Information except as authorized by order of the Commission or the Presiding Administrative Law Judge. Persons described in Paragraphs 4, 5, 7 and 9 shall use and disclose such information only in accordance with this Protective Order and may allow others to have access to Proprietary Information only in accordance with the conditions and limitations set forth in this Protective Order.

Proprietary Information shall be treated by the parties and by the Reviewing Representative in accordance with the terms of this Protective Order, which are hereby expressly incorporated into the certificate that must be executed pursuant to Paragraph 5. Proprietary Information shall be used as necessary, for the conduct of this proceeding and for no other purpose. Proprietary Information shall not be disclosed in any manner to any person except a Reviewing Representative who is engaged in the conduct of this proceeding and who needs to know the information in order to carry out that person's responsibilities in this proceeding.

Reviewing Representatives may not use anything contained in any Proprietary Information obtained through this proceeding to give any party or any competitor of any party a commercial advantage. In the event that a party wishes to designate as a Reviewing Representative a person not described in Paragraph 5, the party must first seek agreement to do so from the party providing the Proprietary Information. If an agreement is reached, the designated individual shall be a Reviewing Representative pursuant to Paragraph 5 above with respect to those materials. If no agreement is reached, the party seeking to have a person designated a Reviewing Representative shall submit the disputed designation to the presiding Administrative Law Judge for resolution.

9. Proprietary Information produced in this proceeding shall be made available to the Commission and its Staff. For purposes of filing, to the extent that Proprietary Information is

placed in the Commission's report folders, such information shall be handled in accordance with routine Commission procedures inasmuch as the report folders are not subject to public disclosure. To the extent that Proprietary Information is placed in the Commission's testimony or document folders, such information shall be separately bound, conspicuously marked, and accompanied by a copy of this Protective Order. Public inspection of Proprietary Information shall be permitted only in accordance with this Protective Order.

10. The Commission and all nonproducing parties will consider and treat the Proprietary Information as within the exemptions from disclosure provided in the Pennsylvania Right to Know Law ("RTKL"), Act of February 14, 2008, P.L. 6, 65 P.S. §§ 67.101-67.3104, effective January 1, 2009, until such time as the information is found by a tribunal with jurisdiction to be non-proprietary or subject to one or more exemptions. In the event that any person or entity seeks to compel the disclosures of Proprietary Information under Section 335(d) and/or the RTKL, the Commission and/or the party receiving such request shall promptly notify the producing party in order to provide the producing party an opportunity to oppose or limit such disclosure. None of the parties waive their right to pursue any available remedies that may be available in the event of actual or anticipated disclosure of Proprietary Information.

11. Any public reference to Proprietary Information by a Party shall be to the title or exhibit reference in sufficient detail to permit persons with access to the Proprietary Information to fully understand the reference and not more. The Proprietary Information shall remain a part of the record, to the extent admitted, for all purposes of administrative or judicial review.

12. Part of any record of this proceeding containing Proprietary Information shall be sealed for all purposes, including administrative and judicial review, unless such Proprietary Information is released from the restrictions of this Protective Order, either through the agreement

of the Parties or pursuant to an order of the Administrative Law Judge, the Commission or appellate court.

13. The parties shall retain the right to question or challenge the confidential or proprietary nature of Proprietary Information. If a nonproducing Party challenges the designation of a document or information as within the definition established in paragraph 3 of this Protective Order, the Party providing the information retains the burden of demonstrating that the designation is appropriate.

14. The parties shall retain the right to question or challenge the admissibility of Proprietary Information; to object to the production of Proprietary Information on any proper ground other than confidentiality; to refuse to produce Proprietary Information pending the adjudication of the objection; and to seek additional measures of protection of Proprietary Information beyond those provided in this Protective Order.

15. Within 30 days after a Commission Final Order is entered in the above-captioned proceeding, or in the event of appeals, within thirty days after appeals are finally decided, the nonproducing Party, upon request, shall either destroy or return to the producing Party all copies of all documents and other materials not entered into the record, including notes, which contain any Proprietary Information. In the event that the nonproducing Party elects to destroy all copies of documents and other materials containing Proprietary Information instead of returning the copies of documents and other materials containing Proprietary Information to the producing Party, the nonproducing Party shall certify in writing to the producing Party that the Proprietary Information has been destroyed.

Dated: _____

Administrative Law Judge
Marta Guhl

CERTIFICATE OF SERVICE

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

VIA ELECTRONIC MAIL ONLY

Daniel Clearfield, Esquire
Carl R. Shultz, Esquire
Kristine Marsilio, Esquire
Eckert Seamans Cherin & Mellott, LLC
213 Market Street, 8th Floor
Harrisburg, PA 17101
dclearfield@eckertseamans.com
cshultz@eckertseamans.com
kmarsilio@eckertseamans.com
Counsel for Philadelphia Gas Works

Lauren M. Burge, Esquire
Eckert Seamans Cherin & Mellott, LLC
U.S. Steel Tower
600 Grant Street, 44th Floor
Pittsburgh, PA 15219
lburge@eckertseamans.com
Counsel for Philadelphia Gas Works

Gregory J. Stunder, Esquire
Craig W. Berry, Esquire
Philadelphia Gas Works
800 West Montgomery Avenue
Philadelphia, PA 19122
Gregory.Stunder@pgworks.com
Craig.Berry@pgworks.com

Harrison W. Breitman
Office of Consumer Advocate
555 Walnut Street
5th Floor, Forum Place
Harrisburg, PA 17101-1923
HBreitman@paoca.org

Sharon E. Webb
Assistant Small Business Advocate
Office of Small Business Advocate
Forum Place
555 Walnut Street, 1st Floor
Harrisburg, PA 17101
swebb@pa.gov

Gina L. Miller, Esquire
Pennsylvania Public Utility Commission
Bureau of Investigation and Enforcement
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17120
ginmiller@pa.gov



Dennis A. Whitaker
Kevin J. McKeon
Todd S. Stewart
Bryce R. Beard

DATED: January 25, 2022