

COMMONWEALTH OF PENNSYLVANIA



PATRICK M. CICERO
Consumer Advocate

OFFICE OF CONSUMER ADVOCATE
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April 6, 2023

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

Re: Office of Consumer Advocate and
Office of Small Business Advocate
v.
Commonwealth Telephone Company,
LLC d/b/a Frontier Communications
Commonwealth Telephone Company
Docket No. C-2023-3037574

Dear Secretary Chiavetta:

Attached for electronic filing please find the Office of Consumer Advocate's Prehearing Memorandum in the above-referenced proceeding.

Copies have been served on the parties as indicated on the enclosed Certificate of Service.

Respectfully submitted,

/s/ Barrett C. Sheridan
Barrett C. Sheridan
Assistant Consumer Advocate
PA Attorney I.D. # 61138
E-Mail: BSheridan@paoca.org

Enclosures:

cc: The Honorable Steven K. Haas (**email only**)
The Honorable John Coogan (**email only**)
Certificate of Service

*344044

CERTIFICATE OF SERVICE

Office of Consumer Advocate and :
Office of Small Business Advocate :
v. : Docket No. C-2023-3037574
:
Commonwealth Telephone Company, :
LLC d/b/a Frontier Communications :
Commonwealth Telephone Company :

I hereby certify that I have this day served a true copy of the following document, the Office of Consumer Advocate’s Prehearing Memorandum, upon parties of record in this proceeding in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant), in the manner and upon the persons listed below:

Dated this 6th day of April 2023.

SERVICE BY E-MAIL ONLY

Norman J. Kennard, Esquire
Bryce R. Beard, Esquire
Eckert Seamans Cherin & Mellott, LLC
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Counsel for “Frontier Commonwealth”

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swebb@pa.gov
nhurdle@pa.gov
Counsel for OSBA

SERVICE BY E-MAIL ONLY (continued)

Frederick Thomas, Esquire
Vice President, Associate General Counsel,
US Counsel for Commercial Sales, &
East Region Operations Counsel
Frontier Communication Parent, Inc.
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Norwalk, CT 06851
FT7230@ftr.com
Counsel for "Frontier Commonwealth"

/s/ Barrett C. Sheridan
Barrett C. Sheridan
Assistant Consumer Advocate
PA Attorney I.D. # 61138
E-Mail: BSheridan@paoca.org

Aron J. Beatty
Senior Assistant Consumer Advocate
PA Attorney I.D. # 86625
E-Mail: ABeatty@paoca.org

Counsel for:
Office of Consumer Advocate
555 Walnut Street
5th Floor, Forum Place
Harrisburg, PA 17101-1923
Phone: (717) 783-5048
Dated: April 6, 2023
*344043

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Office of Consumer Advocate,	:	
Office of Small Business Advocate,	:	
Complainants,	:	
	:	
v.	:	Docket No. C-2023-3037574
	:	
Commonwealth Telephone Company, LLC	:	
d/b/a Frontier Communications Telephone	:	
Company,	:	
Respondent.	:	

**PREHEARING MEMORANDUM OF
THE OFFICE OF CONSUMER ADVOCATE**

Pursuant to Section 333 of the Public Utility Code, 66 Pa. C.S. § 333, and the Prehearing Conference Order issued by Administrative Law Judges Steven Haas and John Coogan (ALJs) March 9, 2023, the Office of Consumer Advocate (OCA) provides the following information:

I. INTRODUCTION

On January 9, 2023, the OCA and Office of Small Business Advocate (OSBA) filed a verified Joint Complaint against Commonwealth Telephone Company, LLC d/b/a Frontier Communications Telephone Company (Frontier or Company). The Joint Complaint identifies Frontier’s obligation to comply with: the Public Utility Code and regulations as a public utility and local exchange company, with its Amended Chapter 30 Plan, with Commission’s orders, and with obligations as an Eligible Telecommunications Carrier (ETC). The Joint Complaint identifies

Frontier as subject to the “Frontier Voluntary Commitments” tendered by the Frontier affiliate group applicants that sought Commission approval of its post-bankruptcy change of control.

The Joint Complaint alleges that Frontier has provided unreasonable telephone service to its customers in a variety of ways, contrary to Frontier’s obligations under the law. The Joint Complaint alleges that Frontier’s broadband internet access service is not sufficiently available to satisfy the Company’s Chapter 30 Plan obligations. The Joint Complaint notes that the Company’s conduct adversely impacts the interests of residential consumers, small businesses, community organizations, and public safety.

On February 21, 2023, the Company filed its verified Answer to the Joint Complaint.

A Prehearing Conference has been scheduled for April 11, 2023.

II. ISSUES AND SUB-ISSUES

The central issue in this Joint Complaint proceeding is the quality of service provided by Frontier to its customers. Whether Frontier is in compliance with the Section 1501 obligation to provide service that is adequate and reasonably continuance for the benefit of customers and the public is at issue. The questions presented will include consideration of Frontier’s investment in its facilities, staffing levels to assure that repairs may be promptly and effectively completed, and customer service operations.

Frontier also has an obligation to make available broadband internet access service at speeds that meet – at a minimum – the Chapter 30 statutory definition. Informal consumer complaints received by the Joint Complainants indicate that Frontier’s network and provision of broadband service does not meet this Chapter 30 minimum requirement when outages and interruptions result in no connectivity at any speed.

The Joint Complainants reserve the right to add to these issues, as additional information is received from Frontier consumers and the public.

III. WITNESSES

The OCA intends to present the direct, rebuttal and surrebuttal testimony, as may be necessary, of Susan Baldwin. Ms. Baldwin will present testimony in written form and will also attach various exhibits, documents and explanatory information that will assist in the presentation of the OCA's case. In order to expedite the resolution of this proceeding, the OCA requests that copies of all interrogatories, testimony, and answers to interrogatories be delivered directly to its expert witness at the following address, as well as mailing a copy to counsel for the OCA:

Susan M. Baldwin
SMBaldwin Consulting
45 Acorn Path
Groton, MA 01450
E-Mail: sembaldwinconsulting@gmail.com

The OCA specifically reserves the right to call additional witnesses, as necessary. As soon as the OCA has determined if an additional witness or witnesses will be necessary for any portion of its case, all parties of record will be notified.

IV. SERVICE ON THE OCA

The OCA will be represented in this case by Assistant Consumer Advocate Barrett C. Sheridan and Senior Assistant Consumer Advocate Aron J. Beatty. The OCA only requires e-service at the following e-mail addresses:

Barrett C. Sheridan
Assistant Consumer Advocate
Office of Consumer Advocate

5th Floor, Forum Place
555 Walnut Street
Harrisburg, PA 1710-1923
Telephone: (717) 783-5048
E-mail: BSheridan@paoca.org
ABeatty@paoca.org

V. PROPOSED REVISED PROCEDURAL RULES

To date, the OCA has served two (2) sets of interrogatories on the Company. Going forward, the OCA proposes the following modifications to the Commission's discovery regulations, going forward:

A. Answers to interrogatories and responses to requests for document production, entry for inspection, or other purposes shall be served in-hand within fifteen (15) calendar days of service of the interrogatories or requests for production.

B. Objections to interrogatories and/or requests for production shall be communicated orally within three (3) calendar days of service; unresolved objections shall be served in writing within five (5) calendar days of service of the interrogatories and/or requests for production.

C. Motions to dismiss objections and/or direct the answering of interrogatories and/or requests for production shall be filed within three (3) calendar days of service of written objections.

D. Answers to motions to dismiss objections and/or direct the answering of interrogatories and/or requests for production shall be filed within three (3) calendar days of service of such motions.

E. Requests for admission be deemed admitted unless answered within ten (10) days or objected to within five (5) days of service.

F. Discovery requests and discovery related pleadings (such as objections, motions, and answers to same) served after 4:30 p.m. Monday through Thursday or after 12:00 p.m. on a Friday or the day preceding a holiday shall be deemed to have been served on the next business day.

G. On the Record Data requests will be provided within five (5) calendar days.

VI. PUBLIC INPUT HEARINGS

The OCA is aware of strong consumer interest in the Joint Complaint and the request for improvements in the quality of service provided by Frontier. Additionally, the OCA notes that the following state legislators have submitted letters to the Commission requesting that a public input hearing be scheduled for the convenience of their constituents who are also customers of Frontier:

Senator Gene Yaw
Representative Clinton D. Owlett
Representative Tina Pickett
Representative Jonathan A. Fritz
Representative Joe Hamm

Copies of each legislator's letter request are attached to the OCA Prehearing Memorandum, as Appendix A.

The OCA requests that the Commission schedule three days of in-person public input hearings within the Company's service area. Senator Yaw has requested a regional public input hearing within Tioga or Bradford County. Representative Fritz has request public hearings in the Northern Tier area served by the Company. Representative Hamm has requested an in person public input hearing in Sullivan County. Representatives Owlett and Picket have requested public input hearings in their respective districts.

The OCA proposes Wellsboro and Wysox as two locations familiar to the interested public, the Company, and the Joint Complainants. Representatives Pickett and Owlett hosted informational meetings about the Joint Complaint in February 2023 in Wysox and Wellsboro and both meetings were well attended. The OCA suggests a third in-person public input hearing be scheduled to provide another option for Frontier customers in the other northern counties.

VII. PROCEDURAL SCHEDULE

The Parties have mutually agreed to the following procedural schedule:

Public Input Hearings (In Person)	June 6, 7, 8, 2023 (Tue., Wed., Th.)
OCA, OSBA Direct Testimony	July 19, 2023 (Wed.)
Company Rebuttal	Sept. 7, 2023 (Th.)
OCA, OSBA Surrebuttal	Oct. 5, 2023 (Th.)
Hearings	Oct. 23 & 24, 2023 (Tue., Wed.)

The OCA recognize that the OALJ will require some flexibility in confirming the location and date for each day of in person public input hearings. Should one or more public input hearing occur after the due date for the Direct Testimony by the Joint Complainants, the Joint Complainants reserve the right to file Supplemental Direct based upon each such public input hearing and review of the hearing transcript(s).

VIII. SETTLEMENT

The OCA is willing to participate in settlement discussions with the parties.

Respectfully Submitted,

/s/ Barrett C. Sheridan

Barrett C. Sheridan
Assistant Consumer Advocate
PA Attorney I.D. # 61138
E-Mail: BSheridan@paoca.org

Aron J. Beatty
Senior Assistant Consumer Advocate
PA Attorney I.D. # 86625
E-Mail: ABeatty@paoca.org

Counsel for:
Patrick M. Cicero
Consumer Advocate

Office of Consumer Advocate
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5th Floor, Forum Place
Harrisburg, PA 17101-1923
Phone: (717) 783-5048
Fax: (717) 783-7152
DATE: April 6, 2023
000343939.docx

**SENATOR
GENE YAW
23RD SENATORIAL DISTRICT**

□ 362 MAIN CAPITOL
SENATE BOX 203023
HARRISBURG, PA 17120-3023
(717) 787-3280
FAX (717) 772-0575

□ 175 PINE STREET, SUITE 105
WILLIAMSPORT, PA 17701
(570) 322-6457
FAX (570) 327-3703
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□ 5 MAIN STREET
WELLSBORO, PA 16901
570-724-5231
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gyaw@pasen.gov



Senate of Pennsylvania

March 15, 2023

COMMITTEES

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JUDICIARY, VICE CHAIR

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BANKING & INSURANCE

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RECREATIONAL DEVELOPMENT

MAJORITY POLICY

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THE CENTER FOR RURAL PENNSYLVANIA
CHAIRMAN

Secretary Rosemary Chiavetta, Esq.
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
2nd Floor, Room-N201
400 North Street
Harrisburg, Pennsylvania 17120

RE: OCA & OSBA v Commonwealth d/b/a Frontier (C-2023-3037574)

Dear Secretary Chiavetta:

It is my understanding that the Office of Consumer Advocate (OCA) and the Office of Small Business Advocate (OSBA) have filed a complaint against Commonwealth d/b/a Frontier that has been assigned to Administrative Law Judges Haas and Coogan. These ALJs have set a prehearing conference the morning of Tuesday, April 11, 2023. I also understand that at this conference, it will be determined whether a public input hearing will be held. I am writing to voice my full support for a regional public input hearing in either Tioga County or Bradford County for customers with complaints against Frontier.

Over the past several months, approximately 300 Frontier Commonwealth customers submitted informal complaints to PA State Representatives Tina Pickett, Clint Owlett, and Martin Causer, describing serious and persistent service problems experienced with Frontier's telephone and broadband service availability. These complaints were shared with me by the State Representatives and raise fundamental safety concerns for the affected customers. Without access to these basic communication services, these Pennsylvanians have been unable to correspond via phone or computer with family members, physicians, and emergency services, etc. This is not acceptable by any standard.

I join with my fellow legislators in support of a regional public input hearing and urge you to consider this as an opportunity to ensure these Pennsylvanians are given a collective voice to express their concerns regarding these significant Frontier service issues. I appreciate your consideration.

Sincerely,

A handwritten signature in blue ink that reads "Gene Yaw".

GENE YAW
SENATOR

GY/dr

C: Patrick M. Cicero, PA Office of Consumer Advocate
NazAarah Sabree, PA Office of Small Business Advocate

orig. mailed 3/13/23

CLINTON D. OWLETT, MEMBER

HARRISBURG OFFICE

PO BOX 202068
HARRISBURG, PA 17120-2068
PHONE: (717) 772-5371
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Email: cowlett@pahousegop.com
Web: www.repowlett.com
Facebook.com/RepOwlett



House of Representatives

Commonwealth of Pennsylvania
Harrisburg

DISTRICT OFFICES

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COMMITTEES

AGRICULTURE & RURAL AFFAIRS
APPROPRIATIONS
ETHICS
HEALTH
STATE GOVERNMENT

March 9, 2023

Secretary Rosemary Chiavetta, Esq Secretary's Bureau
Pennsylvania Public Utility Commission, Commonwealth Keystone Building
2nd Floor, Room-N201
400 North Street
Harrisburg, Pennsylvania 17120

Attention: Judge Haas

Dear Judge Haas,

It has come to my attention that you are serving as the ALJ for OCA & OSBA v Commonwealth d/b/a Frontier (C-2023-3037574) and that there will be a prehearing conference on the morning of Tuesday, April 11th. Frist and foremost, thank you for hearing this case as it is incredibly important to the community, I have been given the opportunity to represent.

The stories that I and my staff have heard are heartbreaking. The one that sticks out in my mind right now is the elderly gentleman who could not contact his physician about his cancer treatments because of his phone line being out for weeks. His nurse ended up advocating on his behalf to try and get his phone working to continue his treatment.

The second would be a large number of calls from relatives who can't contact their loved ones, and those loved ones' lifeline systems are inactive because of phone lines being down for months. The stress this has caused is inexcusable, not to mention the threat to the health and safety of these residents.

Our office alone has received nearly 200 complaint forms from constituents who have had or are currently having issues with their phone lines. This make sense as I can see the line issues as I drive around the district. It's also worth noting that we continue receiving complaints each day. At times we would receive 4-6 calls or emails a day. This is especially concerning for those who do not have cell service in our remote areas.

I would humbly ask that you hold an in-person public input hearing in our district. Rep. Tina Pickett and I hosted two meetings with OCA and OSBA in our district to explain the next steps of this process. The community made it clear that they would like to have the opportunity to speak during this important hearing. The reality is that many cannot or do not have the ability to join an online format because of the very topic in this case. I believe the best avenue for effective communication would be for an in-person public hearing.

Your consideration of this request is greatly appreciated. These truly have been and continue to be safety concerns.

Sincerely,

Rep. Clint Owlett

Orig. Mailed 3/13/23

CLINTON D. OWLETT, MEMBER

HARRISBURG OFFICE

PO BOX 202068
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PHONE: (717) 772-5371
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Email: cowlett@pahousegop.com
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COMMITTEES

AGRICULTURE & RURAL AFFAIRS
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ETHICS
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March 9, 2023

Secretary Rosemary Chiavetta, Esq Secretary's Bureau
Pennsylvania Public Utility Commission, Commonwealth Keystone Building
2nd Floor, Room-N201
400 North Street
Harrisburg, Pennsylvania 17120

Attention: Judge Coogan

Dear Judge Coogan,

It has come to my attention that you are serving as the ALJ for OCA & OSBA v Commonwealth d/b/a Frontier (C-2023-3037574) and that there will be a prehearing conference on the morning of Tuesday, April 11th. Frist and foremost, thank you for hearing this case as it is incredibly important to the community, I have been given the opportunity to represent.

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Your consideration of this request is greatly appreciated. These truly have been and continue to be safety concerns.

Sincerely,

A handwritten signature in black ink, appearing to read "Clint Owlett".

Rep. Clint Owlett

orig. mailed 3/13/23

CLINTON D. OWLETT, MEMBER

HARRISBURG OFFICE

PO BOX 202068
HARRISBURG, PA 17120-2068
PHONE: (717) 772-5371
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House of Representatives
Commonwealth of Pennsylvania
Harrisburg

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COMMITTEES

AGRICULTURE & RURAL AFFAIRS
APPROPRIATIONS
ETHICS
HEALTH
STATE GOVERNMENT

March 9, 2023

Secretary Rosemary Chiavetta, Esq Secretary's Bureau
Pennsylvania Public Utility Commission, Commonwealth Keystone Building
2nd Floor, Room-N201
400 North Street
Harrisburg, Pennsylvania 17120

Attention: Secretary Rosemary Chiavetta,

Dear Rosemary Chiavetta,

It has come to my attention that you are serving as the ALJ for OCA & OSBA v Commonwealth d/b/a Frontier (C-2023-3037574) and that there will be a prehearing conference on the morning of Tuesday, April 11th. Frist and foremost, thank you for hearing this case as it is incredibly important to the community, I have been given the opportunity to represent.

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Your consideration of this request is greatly appreciated. These truly have been and continue to be safety concerns.

Sincerely,

A handwritten signature in black ink, appearing to read "Clint Owlett".

Rep. Clint Owlett



House of Representatives

Commonwealth of Pennsylvania
Harrisburg

March 14, 2023

Secretary Rosemary Chiavetta, Esq.
Secretary's Bureau
Pennsylvania Public Utility Commission
400 North Front Street
Keystone Building
Harrisburg, PA 17120

RE: C-2023-3037574

Office of Consumer Advocate & Office of Small Business Advocate

v.

Commonwealth Telephone Company, LLC d/b/a Frontier Communications

To Administrative Law Judges Haas and Coogan,

I write to you requesting that public hearings be held in my district regarding the above-captioned matter. Frontier Communications has been a frequent subject of complaint for myself and for many of my constituents. There has been a sustained and glaring lack of maintenance and repair of Frontier's systems and infrastructure, which has resulted in service that is not reasonably continuous, and fraught with unreasonable interruptions and delay. This has impacted our community significantly and resulted in community safety issues caused by an inability to reliably contact emergency services.

There has been a dearth of communication from Frontier Communications on these issues and plans to improve the services and facilities are non-existent to my knowledge. I question whether commitments made by this company to the Public Utility Commission under their obligations arising from Title 66, Chapter 30 are being adhered to and I thank you for your inquiries into this matter.

I also would like to commend the Office of Consumer Advocate and the Office of Small Business Advocate for their attention on this longstanding problem that impacts me and my

constituents lives every day. I hope you will consider holding public hearings in my district and I will endeavor to be as helpful as I can in arranging such a hearing.

Sincerely,

A handwritten signature in cursive script that reads "Tina Pickett". The signature is written in black ink and is positioned to the left of the typed name.

Tina Pickett
State Representative
110th Legislative District
Bradford (part) & Wyoming Counties

cc: Patrick M. Cicero, Consumer Advocate
NazAarah Sabree, Small Business Advocate

JONATHAN A. FRITZ, MEMBER
111TH LEGISLATIVE DISTRICT

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House of Representatives
Commonwealth of Pennsylvania
Harrisburg

COMMITTEES:

FINANCE

GAMING OVERSIGHT

INSURANCE

WEB: repfritz.com
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March 23, 2023

Secretary Rosemary Chiavetta, Esq.
Secretary's Bureau
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
2nd Floor, Room-N201
400 North Street
Harrisburg, Pennsylvania 17120

RE: C-2023-3037574

Office of Consumer Advocate & Office of Small Business Advocate

v.

Commonwealth Telephone Company, LLC d/b/a Frontier Communications

Dear Secretary Chiavetta:

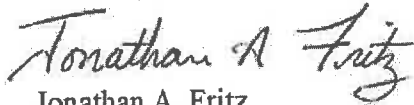
Please allow this correspondence to serve as a formal request that public hearings be held in the Northern Tier area regarding the above-captioned matter. Frontier Communications has been an unceasing subject of complaint for my constituents. There has been an inexplicably protracted lack of maintenance and repair of Frontier's systems and infrastructure. This disregard has resulted in regular lost service for my constituents and unreasonable delay in taking restorative action. This has impacted our community significantly and resulted in community safety issues caused by an inability to reliably contact emergency services.

A genuine plan-of-action from Frontier Communications seems non-existent. I question whether commitments made by this company to the Public Utility Commission under their obligations arising from Title 66, Chapter 30 are being adhered to and I thank you for your inquiries into this matter.

Page two
March 23, 2023
Secretary Rosemary Chiavetta, Esq.

I also would like to commend the Office of Consumer Advocate and the Office of Small Business Advocate for their attention on this longstanding problem that impacts me and my constituents lives every day. I hope you will consider holding public hearings in my region and I will endeavor to be as helpful as I can in arranging such a hearing.

Sincerely,



Jonathan A. Fritz
111th Legislative District

cc: Phillip Kirchner, Esq., Counsel/Executive Director
Consumer Protection, Technology and Utilities
NazAarah Sabree
PA Office of Small Business Advocate
Patrick Cicero, Esq.
PA Office of Consumer Advocate

JOE HAMM, MEMBER
84TH LEGISLATIVE DISTRICT
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PHONE: 717-787-5270

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House of Representatives
Commonwealth of Pennsylvania
Harrisburg

COMMITTEES
ENVIRONMENTAL RESOURCES
AND ENERGY
GAME AND FISHERIES
LOCAL GOVERNMENT
VETERANS AFFAIRS AND
EMERGENCY PREPAREDNESS

CAUCUSES:
AGRICULTURE
BROADBAND
GAS & OIL
PRO LIFE
SECOND AMENDMENT

JHAMM@PAHOUSEGOP.COM
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March 21, 2023

Secretary Rosemary Chiavetta, Esq Secretary's Bureau
Pennsylvania Public Utility Commission, Commonwealth Keystone Building
2nd Floor, Room-N201
400 North Street
Harrisburg, Pennsylvania 17120

Attention: Judge Haas

Dear Judge Haas:

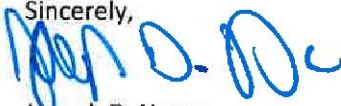
It has come to my attention you are serving as the ALJ for OCA & OSBA v Commonwealth d/b/a Frontier (C-2023-3037574) and that there will be a prehearing conference on the morning of Tuesday, April 11. Thank you for hearing this case as it is incredibly important to residents in my district, particularly in rural Sullivan County, which is the second least-populous county in the Commonwealth.

The stories my staff and I have heard from constituents are heartbreaking. Many of the people who contact me with Frontier service disruptions are elderly with limited access to resources. Several of them struggle just to manage their medical conditions, treatments, and follow up appointments. Having an additional burden of losing landline telephone and internet service places their wellbeing and safety at great risk, as well as causing increased anxiety and frustration.

My office has received several complaint forms from constituents who have had or are currently having issues with their Frontier telephone lines. I routinely see the line issues as I drive throughout my district. It is also worth noting that my offices continue to receive complaints every week from residents in rural Sullivan County. This is especially concerning for those who do not have cell service in our remote areas, which is most of that county. Sullivan County residents depend on reliable landline telephone service as their primary means of communication.

I ask that you hold an in-person public input hearing in Sullivan County. Representatives Tina Pickett and Clint Owlett hosted two meetings with OCA and OSBA in their districts to explain the next steps of this process. The community made it clear they would like to have the opportunity to speak during this important hearing. Many Frontier customers cannot or do not have the ability to join an online format because of the very topic in this case. I believe the best avenue for effective communication would be for an in-person public hearing. Otherwise, you will receive an incomplete depiction of how Frontier customers are being negatively impacted.

Your consideration of this request is greatly appreciated. Please feel free to contact me if you wish to further discuss.

Sincerely,

Joseph D. Hamm
State Representative
84th District

JOE HAMM, MEMBER

84TH LEGISLATIVE DISTRICT

CAPITOL OFFICE:

P.O. BOX 202084

HARRISBURG, PA 17120-2084

PHONE: 717-787-5270

DISTRICT OFFICES:

274 BROAD STREET

MONTOURSVILLE, PA 17754

PHONE: 570-546-2084

PHONE: 570-327-2084

TIADAGHTON VALLEY MALL, ROOM 105

701 ALLEGHENY STREET, BOX 4

JERSEY SHORE, PA 17740

PHONE: 570-398-4476

FAX: 570-398-5963



House of Representatives

Commonwealth of Pennsylvania

Harrisburg

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EMERGENCY PREPAREDNESS

CAUCUSES:

AGRICULTURE
BROADBAND
GAS & OIL
PRO LIFE
SECOND AMENDMENT

JHAMM@PAHOUSEGOP.COM
WWW.REPJAMM.COM

March 21, 2023

Secretary Rosemary Chiavetta, Esq Secretary's Bureau
Pennsylvania Public Utility Commission, Commonwealth Keystone Building
2nd Floor, Room-N201
400 North Street
Harrisburg, Pennsylvania 17120

Attention: Judge Coogan

Dear Judge Coogan:

It has come to my attention you are serving as the ALJ for OCA & OSBA v Commonwealth d/b/a Frontier (C-2023-3037574) and that there will be a prehearing conference on the morning of Tuesday, April 11. Thank you for hearing this case as it is incredibly important to residents in my district, particularly in rural Sullivan County, which is the second least-populous county in the Commonwealth.

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Sincerely,

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Joseph D. Hamm

State Representative

84th District

JOE HAMM, MEMBER
84TH LEGISLATIVE DISTRICT

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P.O. BOX 202084
HARRISBURG, PA 17120-2084
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March 21, 2023

Secretary Rosemary Chiavetta, Esq Secretary's Bureau
Pennsylvania Public Utility Commission, Commonwealth Keystone Building
2nd Floor, Room-N201
400 North Street
Harrisburg, Pennsylvania 17120

Attention: Secretary Rosemary Chiavetta

Dear Rosemary:

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Joseph D. Hamm
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