



May 15, 2024

**VIA E-FILE**

Rosemary Chiavetta, Secretary  
PA Public Utility Commission  
P.O. Box 3265  
Harrisburg, PA 17105

**Re: Guidelines for Eligible Customer Lists; Docket No. M-2010-2183412**

Dear Secretary Chiavetta:

Attached for filing, please find the **Joint Comments of the Pennsylvania Utility Law Project (PULP) and Community Legal Services (CLS)** respectfully submitted in response to the Commission's Secretarial Letter for the above mentioned proceeding, published in the Pennsylvania Bulletin on March 16, 2024 (54 Pa.B. 1460).

Respectfully submitted,

*Elizabeth R. Marx*

Elizabeth Marx, Esq.  
*Counsel for PULP*

**BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Guidelines for Eligible Customer Lists

:

Docket No. M-2010-2183412

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JOINT COMMENTS OF  
THE PENNSYLVANIA UTILITY LAW PROJECT (PULP)  
AND  
COMMUNITY LEGAL SERVICES (CLS)

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## **I. INTRODUCTION**

The Pennsylvania Utility Law Project (PULP)<sup>1</sup> and Community Legal Services (CLS)<sup>2</sup> respectfully submit the following Comments in response to the Commission’s Secretarial Letter (2024 Secretarial Letter), published in the Pennsylvania Bulletin on March 16, 2024 (54 Pa.B. 1460), opening the public comment period for Guidelines for Eligible Customer Lists at Docket No. L-2016-2557886.

PULP and CLS have long advocated for robust consumer protections related to the sharing of private consumer data, affirming that all Pennsylvanians have a reasonable expectation that their private, personal information will be safeguarded from unwanted disclosure by their public utility. Indeed, consumers must provide this data and information to establish and maintain utility service, and have a right to protect their information from disclosure to third parties. Eligible Customer Lists (ECLs) provide a means for Electric Distribution Companies (EDCs) and Natural Gas Distribution Companies (NGDCs) to share personal identifying and customer energy usage information directly with Electric Generation Suppliers (EGSs) or Natural Gas Suppliers (NGSs), respectively. ECLs are, at their core, a marketing tool – providing a ready-made list of all the information an EGS may need to market offers directly to consumers. In turn, ECLs contain a host of personally identifying information, including interval usage data<sup>3</sup> which could reveal deeply personal information about a

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<sup>1</sup> PULP is a statewide legal services project of Regional Housing Legal Services and is a member of the Pennsylvania Legal Aid Network. PULP’s mission is to secure just and equitable access to safe and affordable utility services for Pennsylvanians experiencing poverty.

<sup>2</sup> CLS provides free legal advice and representation to low-income Philadelphians. CLS’s mission is to fight poverty, challenge systems that perpetuate injustice, and change lives through cutting-edge advocacy and exceptional legal representation. CLS attorneys and other staff annually assist thousands of people who have unaffordable energy bills.

<sup>3</sup> In its November 12, 2010, Final Opinion and Order at the instant Docket, the Commission stated that notation of an interval meter should be included in the ECL as “notation of an interval meter is crucial to the types of services an EGS may be able to provide...” (2010 Final Opinion and Order at 17).

consumer's habits and activities within their home. As such, it is absolutely critical that consumers are fully informed of their rights and maintain the ability to restrict the release of their information.

The Commission's 2024 Secretarial Letter invites comment on the guidelines that govern both EDC and NGDC ECLs, which were last updated in 2014. The Commission is especially seeking input on the use of electronic methods in communicating with customers, in lieu of written notices mailed using the U.S. Postal Service, and the use of electronic methods for customers to respond to their respective utilities with their ECL preferences regarding their choice to opt out from inclusion in their utility's ECL. We appreciate the Commission providing the opportunity to comment on this important issue.

## **II. BACKGROUND**

The Commission formally established and implemented the use of the ECL in an Order entered on November 12, 2010, at Docket No. M-2010-2183412 (November 2010 Order).<sup>4</sup> The November 2010 Order outlined interim guidelines for EDCs' provision of ECLs to EGSs, specifically providing uniform categories of customer information to be made available and addressing how customers may restrict inclusion of their information in their utility's ECL.

The Commission entered a Final Order on Reconsideration on November 10, 2011, updating the interim ECL guidelines. On August 15, 2013, at Docket No. M-2012-2324075, the Commission adopted a Final Order that established equivalent requirements for NGDCs (August

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<sup>4</sup> Interim Guidelines for Eligible Customer Lists, Opinion and Order, Docket No. M-2010-2183412, Order entered November 12, 2010

2013 Order).<sup>5</sup> On October 23, 2014, after soliciting and considering both informal and formal comments through working groups and through written comment periods, the Commission entered a Final Order adopting final ECL guidelines (October 2014 Order). The October 2014 Order directs EDCs, and the August 2013 Order directs NGDCs, to conduct a solicitation of customers every three years to allow customers to decide if they wish to restrict the information included in their utility's ECL that is provided to EGSs or NGSs in their EDC or NGDC service territory.

On October 30, 2020, Duquesne Light Company (Duquesne or the Company) filed a petition with the Commission to allow the Company to expand its ECL solicitation outreach to include email to *all* residential customers who had provided their email addresses to Duquesne to receive electronic communications – including those that have not enrolled in electronic billing (e-Billing). Duquesne proposed that the email solicitation would take the place of postal mail notification. Duquesne was already permitted to notify e-Billing customers by email regarding their inclusion in the ECL. Duquesne's 2020 Petition pertained only to its 2021 triennial solicitation. The Commission granted the Petition by Order entered January 14, 2021. In December 2021, Duquesne reported to the Commission its evaluation of the expanded ECL solicitation and lessons learned.

On September 29, 2023, Duquesne submitted to the Commission a Petition for Clarification to determine the path forward for the 2024 triennial solicitation and solicitations going forward, since the January 2021 Order only granted permission to conduct expanded electronic outreach for the 2021 solicitation. The Company contended that the high engagement

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<sup>5</sup> Interim Guidelines for Natural Gas Distribution Company Eligible Customer Lists, Final Order, Docket No. M-2012-2324075, Order adopted August 15, 2013.

rate and associated cost savings with conducting the solicitation with more electronic outreach and less postal mail outreach warrant approval of the Petition.

On January 18, 2024, the Commission issued an Opinion and Order both granting the Petition, in part, and denying the Petition, in part. The Commission approved Duquesne to enact the expanded electronic solicitation in 2024, as the Company had done in 2021, but the Commission did not approve expanded electronic solicitation beyond 2024 for Duquesne, nor did it extend this method to other EDCs or NGDCs.

In its Answer to Duquesne's 2024 Petition, the Office of Consumer Advocate (OCA) recommended the Commission initiate a proceeding to investigate the efficacy of email solicitation during triennial ECL periods on a statewide basis and that the Commission consider amendments to the existing ECL guidelines to better address consumer preferences in future ECL solicitations. (January 18, 2024 Order at 8).

In the instant Secretarial Letter, published for comment on March 16, 2024, the Commission enacted the OCA's recommendation and opened the ECL guidelines for comment. The Commission additionally expanded the proceeding to consider ECL guidelines for both EDCs and EGSs and NGDCs and NGSs to maintain consistency across electric and gas utilities and suppliers, reducing the likelihood of consumer confusion. (2024 Secretarial Letter at 3).

### **III. COMMENTS**

Throughout the underlying ECL proceedings and other Commission proceedings addressing consumer data privacy and security, PULP and CLS have steadfastly urged the Commission to exercise caution and care regarding sharing of personal consumer data – arguing that data sharing must be fully informed as to the scope of disclosure, must be rooted in explicit

and affirmative consumer consent, and must result in a clear benefit to the consumer. We have specifically advocated for clear, accessible notification and consumer education policies and affirmative, written consent for release of data.<sup>6</sup>

First and foremost, with respect to the EDC and NGDC ECLs, we urge the Commission to transition the ECL to an “opt-in” list, wherein consumers are asked for their affirmative consent before their personal information is shared with hundreds of energy suppliers and marketers. It is a reasonable assumption of customers that their private information will be kept private unless they take some confirmatory action to change that. Consumers have no choice but to provide their personal information to EDCs and NGDCs to establish and maintain life-sustaining utility service. Consumers are not required to provide the same data to EGSs or NGSs to be connected to service and should not be compelled to share their data with third party suppliers absent provision of explicit, affirmative consent.

Further, we note that the level and type of regulation by the Commission of EDCs and NGDCs is decidedly greater than the authority the Commission possesses over an EGS or NGS. The Commission has more remedies and options available should an EDC or NGDC mishandle consumer information, including imposing fines and making changes to policy and procedures to help protect against future mishandling of data. However, the law does not provide a clear and accessible remedy if an EGS or NGS mishandles data received through the ECL. Indeed, since the Commission established the current ECL opt-out procedure in 2014, the Commonwealth Court has called into question the ability of the Commission to order an EGS to compensate

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<sup>6</sup> Investigation into Conservation Service Provider and Other Third-Party Access to Electric Distribution Company Customer Data, CAUSE-PA Comments, Docket No. M-2021-3029018 (Comments filed on May 5, 2022); 2023 Review of All Jurisdictional Fixed Utilities’ Universal Service Programs, Joint Comments of CAUSE-PA and TURN; Docket No. M-2023-3038944, (Comments filed June 7, 2023).

individual consumers for violation of Commission rules and regulations.<sup>7</sup> While we maintain that the Commission has the jurisdiction to enforce violations of the ECL rules, including the issuance of individualized relief to consumers following unauthorized disclosure, we are concerned an individual consumer's path to relief following a breach of ECL data by an EGS or NGS is nevertheless murky. It is, thus, more important than ever that the Commission ensure consumers are fully informed of and able to affirmatively elect to opt in to the ECL to safeguard consumer data from disclosure.

The opt-in process is utilized for other utility customer transactions such as subscribing to receive electronic bills or other notices or information, or to be placed on an automatic pay option. Both examples, quite reasonably, require the customer to affirmatively sign up for those services. Neither automatically enrolls customers by default, absent the customer's affirmation that they decline to participate, opting out. Given other services provided to customers by EDCs and NGDCs are provided with a customer's express and affirmative consent, utility customers may rightfully believe that they would be required to sign up for, or opt in to, a process by which the utility shares their personal data with any third party, including an EGS or NGS. Divergent programming and messaging often creates confusion and can unnecessarily elicit mistrust of EDCs and NGDCs.

Finally, with the competitive market now firmly established in Pennsylvania, operating for more than two decades, the switch to an opt-in process for the ECL makes sense. EGSs and NGSs have plentiful avenues for advertising. If a customer wishes to opt in to receive additional solicitations, they should have the option to affirmatively request to join the ECL by *opting in* to the release of their personal information. However, consumers should no longer be routinely

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<sup>7</sup> Blue Pilot Energy, LLC v. Pa. Public Utility Commission, 241 A.3d 1254 (Pa. Commw. Ct. 2020).



placed on a marketing list merely because they did not respond to a single, triennial opt-out solicitation.

Nevertheless, should the Commission decide to continue its opt-out policy, we recommend the following adjustments to the ECL guidelines, which we discuss in more detail below: (1) allow EDCs and NGDCs to expand their solicitation outreach methods to include customers who have signed up for both electronic billing and electronic communications, so long as certain criteria are met; (2) allow customers to maintain their selection from the prior triennial solicitation, without having to take further action to protect against the release of their information; and (3) remove consumers from the ECL upon enrollment in the in the utility's CAP program.

*Expanding electronic methods for notifying consumers of the opt out option for the ECL*

In its September 2023 Petition, Duquesne proposed to replicate its practice applied in 2021 of using email as the primary notification method for its ECL solicitation, unless a customer does not have an email on file or has requested to receive hard copies of communications from the Company. Duquesne reported printing and postage cost savings of \$121,895 and a high email open rate with 73.45% opening their solicitation email. Duquesne further proposed to improve customer engagement in the 2024 ECL solicitation by, among other things, making the ECL solicitation mobile friendly, enabling a “one-click” email response option, and creating two or more digital response options including a response option in Duquesne's mobile app and a text response option. In its January 2024 Order, the Commission approved Duquesne's solicitation plan for 2024. (September 2023 Petition at 6-8).

PULP and CLS are not opposed to allowing EDCs and NGDCs to use email as the primary method of notification for the ECL solicitation, as long as the following criteria are met:

1. If a customer unsubscribes from receiving electronic communication, or receives an undeliverable or error message, the utility should be required to provide the ECL solicitation in the postal mail.
2. The email solicitation should clearly convey the required information as directed in the Commission’s October 2014 and August 2013 Orders.<sup>8</sup>
3. The utility should include a “one-click” email response option for consumers to opt out, streamlining the response process for the consumer and for the utility. Consumers should not be required to log in to an online account or otherwise navigate an online portal in order to exercise their right to opt-out in response to an electronic message from their utility.
4. The ECL solicitation should be optimized for access on a mobile device. Low income households often do not have access to broadband internet service or a computer but may have access to online applications and features on a mobile device.<sup>9</sup>

The first two criteria are important to include to maximize the reach of the notification to provide customers with the requisite information, and enable them to make informed decisions about sharing their data. The second two criteria help ensure that the opt-out process is accessible, quick, and easy for customers to manage should they choose this option. If customers

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<sup>8</sup> In the October 2014 Order, the Commission directed EDCs to include in their triennial solicitation notifications, the following: (1) a description of the ECL; (2) what consumer information will be included on the ECL (e.g. consumer name, billing address, and usage history); (3) what the more detailed information represents (specific types of usage history provided to EGSs); (4) how the information will be used by the EGSs; (5) how the information will be safeguarded by the EDCs; (6) how widely the information will be disseminated; and (7) the potential benefits to consumers who choose have their information included on the ECL. (October 2014 Order at 18-19). The August 2013 Order directed NGDCs to include the same information in their solicitations. (August 2013 Order at 13).

<sup>9</sup> Pew Research Center, [Digital Divide Persists Even as Lower-Income Americans Make Gains in Tech Adoption](https://www.pewresearch.org/fact-tank/2019/05/07/digital-divide-persists-even-as-lower-income-americans-make-gains-in-tech-adoption/) (May 7, 2019), <https://www.pewresearch.org/fact-tank/2019/05/07/digital-divide-persists-even-as-lower-income-americans-make-gains-in-tech-adoption/>

must opt-out repeatedly to protect their data from unwanted disclosure, the process to do so must be free of barriers and must be convenient. Anything less would, in essence, force consumers to disclose their data by making it too difficult to opt-out.

*Allow customers to maintain the existing selection for data inclusion in the ECL*

PULP and CLS maintain our position that if a consumer has opted out of having their information included in their utility's ECL, they should retain that status without having to take further affirmative action. Absent this requirement, the triennial solicitation would still serve as a helpful reminder to consumers that they can opt back in to their utility's ECL at a later date. The triennial solicitation could also serve as a notification to those consumers who previously opted out that having their information included in the ECL may help allow for marketing tailored to their energy usage, if that type of marketing appeals to them.

Once a customer opts out, however, they should never be returned to the list without their explicit, affirmative consent. If they opted out in a prior solicitation, that response should stay in place until the customer takes specific, intentional action to change it. We therefore recommend that the Commission have the triennial solicitation sent as a reminder, only, and not as an affirmative requirement for consumers to repeatedly be forced to opt out of the ECL.

In adopting an opt-out policy as described above, the Commission would be aligned with federal consumer finance regulatory policy that dictates both the provision of electronic notification and expiration of customer's selection to opt out. 12 CFR Part 1022 implements the federal Fair Credit Reporting Act. Section 1022.24, which aligns with current Commission ECL practice, provides that eligibility information about a consumer, received from an affiliate to make a solicitation to the consumer about products or services, must not be used unless the

consumer is provided a reasonable opportunity to opt out.<sup>10</sup> Electronic communication is permissible to notify consumers of their ability to opt out. That said, section 1022.22 imposes regulatory requirements that would require adjustment to the Commission’s ECL guidance in its current form. Per section 1022.22 (b), relating to the duration of opt-out, a consumer election to opt out must be honored, at minimum, for a period of five years:

The election of a consumer to opt out must be effective for a period of at least five years (the “opt-out period”) beginning when the consumer’s opt-out election is received and implemented, unless the consumer subsequently revokes the opt-out in writing or, if the consumer agrees, electronically. **An opt-out period of more than five years may be established, including an opt-out period that does not expire unless revoked by the consumer.**<sup>11</sup>

Backed by federal regulation, the Commission should amend ECL guidance to ensure an opt-out selection will be honored unless and until revoked by the consumer. This would be a cleaner and easier solution than adjusting the notification and solicitation to every five years to align with federal regulation, and would more closely match consumer expectation. Namely, that their data will not be subject to release just a few years after they affirmatively elect to shield their information from disclosure to third parties.

*Consumers enrolled in CAP should be removed from the utility ECL*

Following years of well-documented excessive pricing in the competitive market, which was found to drive tens of millions of dollars in unnecessary costs for Customer Assistance Programs (CAP) borne by both CAP participants and other ratepayers, EDCs and NGDCs now require CAP customers to remain enrolled in default service as a condition to participating in CAP.

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<sup>10</sup> 12 CFR Part 1022 – Fair Credit Reporting Act (Regulation V), Section 1022.24; Reasonable opportunity to opt out. <https://www.consumerfinance.gov/rules-policy/regulations/1022/24/>

<sup>11</sup> Id. (emphasis added).

Excessive pricing has been a persistent and pervasive hallmark of the competitive residential energy market for years. In the five-year window from 2015-2020, Pennsylvania’s residential electric shopping customers were charged over \$1.5 billion more than they would have been had they remained on their EDC’s default service.

Table 1: Aggregate Residential Shopping Charges in Excess of Default Service<sup>12</sup>

Utility	Dates Analyzed	Aggregate Shopping Charges in Excess of Default Service Price
PECO Electric	Jan. 2015 – April 2020	\$733,197,940
PPL Electric	Jan. 2015 – May 2020	\$295,828,735
Duquesne Light	Jan. 2017 – May 2020	\$102,869,316
FirstEnergy	Aug. 2017 – Dec. 2021	\$431,152,822
<b>Total</b>		<b>\$1,563,048,813</b>

The ECL’s purpose, as explained throughout the prior ECL proceedings and earlier in these comments, is for use as a marketing tool for EGSs and NGSs to better target and tailor energy offerings to customers. Unfortunately, this targeted marketing approach has become a prevalent factor driving utility insecurity for low income households in Pennsylvania. In a *single month* in December 2021, low income shopping customers in FirstEnergy PA’s service territory were charged between \$46.17 and \$60.71 more than the applicable default service price.<sup>13</sup>

<sup>12</sup> Competitive market pricing data contained throughout this testimony was compiled through litigation in each of the electric utilities’ default service plan proceedings, where competitive market issues are addressed. The data is all part of the public record and is available at the following dockets: Petition of PPL Electric Utilities Corporation for Approval of a Default Service Program for the Period of June 1, 2012 through May 31, 2025, [Testimony of Harry Geller for CAUSE-PA](#), Docket No. P-2020-3019356 (dated June 25, 2020); Petition of PECO Energy Co. for Approval of a Default Service Program for the Period of June 1, 2021 through May 31, 2025, [Testimony of Harry Geller for CAUSE-PA](#), Docket No. P-2020-3019290, at 10 & Exhibit 1 (dated June 16, 2020); Petition of Duquesne Light Company for Approval of a Default Service Program for the Period of June 1, 2021 through May 31, 2025, [Testimony of Harry for CAUSE-PA](#), Docket No. P-2020-3019522, at 10 & Exhibit 1 (dated July 17, 2020); Joint Petition of Metropolitan Edison Company, Pennsylvania Electric Company, Pennsylvania Power Company, and West Penn Power Company for Approval of their Default Service Programs for the period commencing June 1, 2023, through May 31, 2027, Docket Nos. P-2021-3030012, -13, -14, -21 (dated Feb. 25, 2022).

<sup>13</sup> Joint Petition of Metropolitan Edison Company, Pennsylvania Electric Company, Pennsylvania Power Company, and West Penn Power Company for Approval of their Default Service Programs for the period commencing June 1, 2023, through May 31, 2027, Docket Nos. P-2021-3030012, -13, -14, -21 (dated Feb. 25, 2022).

Excessive energy pricing in the competitive market can cause uniquely harmful and lasting consequences for low income consumers. And, for low income CAP participants, excessive pricing causes harm to both the customer and other ratepayers. If a CAP customer shops and the cost of energy is more than the utility price to compare, it drives up costs for all residential customers and puts the CAP customer at risk of losing their more affordable CAP payment.

In PPL’s service territory, where CAP shopping was previously allowed, CAP shopping customers paid, from 2015 – 2020, over \$22 million more than they would have if they remained on default service.

Table 2: CAP Shopping, Total Charges Over Default<sup>14</sup>

Year	Net Charges Over Default	Avg. Annual \$ Over Default – Per-CAP Shopping Customer
2015	\$2,302,877	\$104.77
2016	\$7,394,171	\$284.41
2017	\$4,817,427	\$198.93
2018	\$4,326,841	\$242.56
2019	\$2,909,290	\$284.25
2020	\$943,571 (Jan-May)	\$119.51
<b>Total</b>	<b>\$22,694,177</b>	<b>NA</b>

Similarly, in FirstEnergy PA’s last default service proceeding, data revealed through discovery demonstrated that over the course of 55 months (from June 2013 to December 2017), 65% of the

<sup>14</sup> Petition of PPL Electric Utilities Corporation for Approval of a Default Service Program for the Period of June 1, 2012 through May 31, 2025, Testimony of Harry Geller for CAUSE-PA, Docket No. P-2020-3019356 (dated June 25, 2020).

FirstEnergy PA Companies' CAP customers who had switched to a competitive electric supplier were charged rates that were higher than the utility default service rate.<sup>15</sup>

When CAP customers are charged higher prices, their costs increase and, in turn, the cost of CAP increases. These increased costs affect the affordability of monthly CAP bills, undermining the effectiveness of CAP and causing lasting financial harm to economically vulnerable consumers.

For the foregoing reasons, EDCs and NGDCs now all require that CAP customers must be enrolled in default service to enroll and participate in CAP. Since CAP participants cannot shop for service, their information should not be included in the ECL. EDCs and NGDCs should remove CAP customers from their respective ECLs upon CAP enrollment as they are no longer customers eligible to shop. Indeed, receipt of solicitations from competitive suppliers while enrolled in CAP is likely to cause confusion – undermining the effectiveness of CAP at improving bill payment and coverage rates for economically vulnerable households. PULP and CLS therefore propose that the ECL guidelines be amended to direct EDCs and NGDCs to remove all existing CAP customers from their respective ECLs and to automatically opt CAP customers out of the ECL upon enrollment in CAP.

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<sup>15</sup> Joint Petition of Metropolitan Edison Company, Pennsylvania Electric Company, Pennsylvania Power Company, and West Penn Power Company for Approval of their Default Service Programs for the period commencing June 1, 2019, through May 31, 2023, Testimony of Harry Geller for CAUSE-PA, Docket Nos. P-2017-2637855, -57, -58, -66 (dated Feb. 22, 2018, as corrected March 12, 2018).

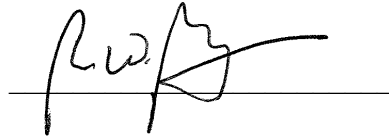
#### IV. CONCLUSION

PULP and CLS appreciate the Commission’s thoughtful consideration of the issues raised in our Comments to the ECL Secretarial Letter. As described in these brief Comments, we urge the Commission to implement an “opt-in” procedure for EDC and NDGC ECLs. In the alternative, we support the Commission allowing expanded electronic communication, subject to the conditions identified above, and we urge the Commission to consider the automatic removal of CAP customers from utility ECLs. We believe these adjustments will help protect consumer data and alleviate consumer confusion.

Respectfully submitted,



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