

**PENNSYLVANIA  
PUBLIC UTILITY COMMISSION  
Harrisburg, PA 17120**

**Regulations Governing the Pa. Public  
Utility Commission's General Provisions at  
52 Pa. Code Chapters 1, 3, and 5**

**Public Meeting held August 22, 2024  
3041347-LAW  
Docket No. L-2023-3041347**

**STATEMENT OF COMMISSIONER KATHRYN L. ZERFUSS**

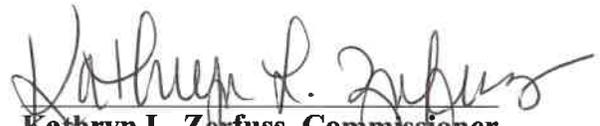
Over 18 years have passed since the Commission last revised the general provisions governing practice before the PUC. Since then, our jurisdictional responsibilities have changed considerably and the nature of administrative practice and procedure has evolved and matured. The Clarified Notice of Proposed Rulemaking (NOPR) we are considering today recognizes that important technological innovations and advancements have occurred since 2006 and proposes updates to bring efficiencies to the current procedures in PUC administrative hearings and proceedings.

We should always endeavor to improve efficiencies in our administrative hearing process and the NOPR takes significant steps in that direction including many substantive considerations. These include proposals to modernize our regulations to meet the realities and circumstances faced by the parties, particularly *pro se* complainants who appear on their own behalf, as well as small businesses navigating our administrative hearing process. I wholeheartedly support these critical policy considerations and welcome the comments and policy debates they will generate.

I emphasize the current proposal to permit “an individual consumer to be represented by an individual who holds a power of attorney over an individual during periods of disability and incapacity.” The proposal is a good starting point, but in my view it falls short of necessary reforms to individual representation, similar to procedures utilized by several other administrative agencies. By authorizing additional representation options for individuals, we may better facilitate the development of evidentiary records in complaint proceedings involving individual consumers. However, I am not prejudging the outcome and welcome a robust discussion. Undoubtedly, inclusion of this issue in the NOPR makes this one of the more consequential rulemakings in a generation that is directly aimed at helping consumers.

I encourage all vested partners – including those organizations representing vulnerable populations such as legal services organizations, law school/pro bono clinics, and organizations representing seniors – to weigh in on this issue. It would be beneficial to hear from experienced paralegals, social workers, and other professionals (who already represent income-eligible individuals in public benefits, unemployment, and other administrative hearings) about this proposal or other similar proposals which could better inform this NOPR on how to accomplish effective representation for individuals in Commission hearings and proceedings.

**DATE: August 22, 2024**

  
**Kathryn L. Zerfuss, Commissioner**