



November 22, 2024

VIA E-File

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

Re: **Nunc Pro Tunc Petition of Pennsylvania-American Water Company for Limited Waiver of 52 Pa. Code § 56.11(a) and Related Tariff Provisions, P-2024-3051518**

CAUSE-PA Answer to PAWC Preliminary Objections

Dear Secretary Chiavetta:

Please find the attached **Answer of the Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania (CAUSE-PA) to the Preliminary Objections of Pennsylvania-American Water Company**, which is respectfully submitted for filing in the above noted proceeding.

As indicated on the attached Certificate of Service, service on the parties was accomplished by email only.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read "John W. Sweet".

John W. Sweet, Esq.
Counsel for CAUSE-PA

CC: Honorable Mark A. Hoyer (mhoyer@pa.gov)
Certificate of Service

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

Nunc Pro Tunc Petition of Pennsylvania- :
American Water Company for Limited : Docket No. P-2024-3051518
Waiver of 52 Pa. Code § 56.11(a) and :
Related Tariff Provisions :

**ANSWER OF
THE COALITION FOR AFFORDABLE UTILITY SERVICES AND ENERGY
EFFICIENCY IN PENNSYLVANIA
TO THE PRELIMINARY OBJECTIONS OF
PENNSYLVANIA-AMERICAN WATER COMPANY**

PENNSYLVANIA UTILITY LAW PROJECT

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November 22, 2024

In response to Pennsylvania-American Water Company's (PAWC) Preliminary Objections (Objections) filed on November 12, 2024, the Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania (CAUSE-PA) files the foregoing Answer pursuant to 52 Pa. Code §§ 5.61(a)(2) and 5.101(f). CAUSE-PA submits that the Commission should deny PAWC's Objections, and aver in support as follows:

I. BACKGROUND

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.

II. LEGAL STANDARD

5. Admitted.
6. Admitted.

7. Admitted. By way of further answer, CAUSE-PA notes that the Commission's procedural rules, including its rules regarding preliminary objection practice, are similar to Pennsylvania civil practice.¹ PAWC relies upon *Stanton-Negley Drug Co. v. Pa. Dept of Pub. Welfare*,² a case that concerns a preliminary objection based on lack of jurisdiction. PAWC has not raised a preliminary objection on the basis of lack of jurisdiction. Rather, PAWC's objection

¹ *Equitable Small Transportation Interveners v. Equitable Gas Company*, 1994 Pa.PUC LEXIS 69, PUC Docket No. C-000935435 (July 18, 1994).

² *Stanton-Negley Drug Co. v. Pa. Dept of Pub. Welfare*, 927 A.2d 671 (Pa. Cmwlth. 2007).

contends only that statements in CAUSE-PA's Answer lack specificity³ or raise impertinent matter.⁴

To be considered "impertinent," allegations must be immaterial and inappropriate to the proof of the cause of action.⁵ Impertinent matter is matter that is irrelevant to the material issues of the case and that, whether proven or not, or whether admitted or denied, can have no influence in leading to the decision of the case. However, only if the allegation is wholly irrelevant to the action in every way, and without any influence on the result, will the matter be deemed impertinent.⁶ The power to grant a preliminary objection premised upon impertinent matter "should be sparingly exercised and only when a party can affirmatively show prejudice."⁷ Allegations or averments that relate solely to evidentiary matters, to which the objecting party may otherwise have opportunity to respond, should not be found to be scandalous or impertinent, and may be regarded as surplusage for purposes of denying preliminary objections.⁸ Any doubt must be resolved in favor of the non-moving party by refusing to sustain preliminary objections.⁹

8. Admitted.

³ PAWC Objections at ¶¶ 9-35 (PAWC Objection No. 1 alleges CAUSE-PA's Petition to Intervene lacks specificity as to the direct, substantial, immediate impact of PAWC's Petition for Waiver.).

⁴ *Id.* at ¶¶ 36-41 (PAWC's Objection No. 2 alleges CAUSE-PA's Answer raises impertinent matter.).

⁵ *Com., Dep't of Env'tl. Res. v. Peggs Run Coal Co.*, 423 A.2d 765, 769 (1980).

⁶ 5 Standard Pennsylvania Practice 2d § 25:61

⁷ *Breslin v. Mountain View Nursing Home, Inc.*, 171 A.3d 818, 829 (2017), citing *Commonwealth Dep't of Env'tl. Res. v. Hartford Accident and Indem. Co.*, 396 A.2d 885, 888 (1979) (internal citations omitted).

⁸ *Diess v. Pennsylvania Dep't of Transp.*, 935 A.2d 895, 910 (Pa. Commw. Ct. 2007).

⁹ *Boyd v. Ward*, 802 A.2d 705 (Pa. Cmwlth. 2002).

III. RESPONSE TO PAWC OBJECTION NO. 1: CAUSE-PA'S PETITION TO INTERVENE AND ANSWER EXPLAINS IN DETAIL HOW PAWC'S BILLING PETITION FOR RETROACTIVE WAIVER OF CONSUMER PROTECTIONS WILL HAVE A DIRECT, SUBSTANTIAL AND IMMEDIATE IMPACT ON ONE OR MORE OF ITS MEMBERS. AS SUCH, ITS PRELIMINARY OBJECTION SHOULD BE DENIED.

A. Petition for Limited Waiver

9. Admitted in part, denied in part. CAUSE-PA admits that the Commission's regulations permit a party to petition for waiver of its regulations. CAUSE-PA denies any inference that PAWC's petition for retroactive waiver complies with the requirements for requesting such a waiver.

10. Admitted in part, denied in part. PAWC's Petition speaks for itself. CAUSE-PA admits that PAWC's Petition contains a request for retroactive waiver of 52 Pa. Code § 56.11(a), as well as Rule 10.1 of PAWC's water tariff and Rule 8 of PAWC's wastewater tariff. CAUSE-PA denies any inference that 52 Pa. Code § 5.43(a) allows "retroactive waiver."

11. Admitted in part, denied in part. CAUSE-PA admits that PAWC accurately quotes a portion of 52 Pa. Code § 56.11(a). CAUSE-PA denies any inference that section 56.11(a) is the only regulatory requirement impacted by PAWC's actions in failing to render a bill, or its proposed remedies in response to that failure. CAUSE-PA avers that additional regulations may be impacted by PAWC's failure to render a timely bill and/or its proposed remedies related thereto. A thorough investigation is necessary to determine the full scope of customer impacts, and whether PAWC's customers will be sufficiently protected from harm if its requests are ultimately granted.

12. Admitted in part, denied in part. CAUSE-PA admits that PAWC correctly quotes a portion of its water tariff, and that PAWC's request for retroactive waiver was limited to this portion of its water tariff. CAUSE-PA denies any inference that this is the only potentially

“pertinent” portion of its water tariff relevant to its billing errors or its proposed remedies related thereto. Further investigation is necessary to determine whether PAWC’s failure to render a bill, and its proposed consumer relief, impacts other provisions of PAWC’s water tariff.

13. Admitted in part, denied in part. CAUSE-PA admits that PAWC correctly quotes a portion of its wastewater tariff, and that PAWC’s request for retroactive waiver was limited to this portion of its wastewater tariff. CAUSE-PA denies any inference that this is the only potentially “pertinent” portion of its tariff which may be relevant to its billing errors, or its proposed remedies related thereto. Further investigation is necessary to determine whether PAWC’s failure to render a bill, and its proposed consumer relief, impacts other provisions of PAWC’s water tariff.

14. Denied. PAWC’s Petition speaks for itself. CAUSE-PA is without independent knowledge or information sufficient to form a belief about the accuracy or truthfulness of PAWC’s averment as to the precise timeframe associated with PAWC’s billing errors.

15. Denied. PAWC’s Petition speaks for itself. CAUSE-PA is without independent knowledge or information sufficient to form a belief about the accuracy or truthfulness of PAWC’s averment as to the causes of the billing issues in question or the extent of the impact of those issues on its customers.

16. Denied. PAWC’s Petition speaks for itself. CAUSE-PA is without independent knowledge or information sufficient to form a belief about the accuracy or truthfulness of PAWC’s averment as to the actions it took subsequent to the billing issues in question or the adequacy of those actions to prevent harm to its customers.

17. Denied. PAWC’s Petition speaks for itself. CAUSE-PA is without independent knowledge or information sufficient to form a belief about the accuracy or truthfulness of PAWC’s

avertment as to the actions it took subsequent to the billing issues in question or the adequacy of those actions to prevent harm to its customers.

18. Denied. PAWC's Petition speaks for itself. CAUSE-PA is without independent knowledge or information sufficient to form a belief about the accuracy or truthfulness of PAWC's averment as to the actions it took subsequent to the billing issues in question or the adequacy of those actions to prevent harm to its customers. As explained in its Petition to Intervene and Answer, CAUSE-PA is concerned that this level of funding may be inadequate to meet the needs of impacted customers who may need additional assistance as a result of PAWC's billing errors, including those who may not meet the requirements of the hardship fund program, and may lead to the depletion of funding intended to assist customers with hardships not caused by PAWC's billing errors.¹⁰

19. Denied. PAWC's Petition speaks for itself. CAUSE-PA is without independent knowledge or information sufficient to form a belief about the accuracy or truthfulness of PAWC's averment as to the actions it took subsequent to the billing issues in question or the adequacy of those actions to prevent harm to its customers. As identified in its Petition to Intervene and Answer, and based on limited additional information disclosed by PAWC through informal discovery, CAUSE-PA is concerned that PAWC's proposed 12-month payment arrangements are inadequate to address harm created by PAWC's billing errors, and that customers with an existing payment arrangement at the time of PAWC's failure to issue a bill may not be afforded this relief.¹¹

20. Denied. PAWC's Petition speaks for itself. As identified in its Petition to Intervene and Answer, CAUSE-PA avers that PAWC's failure to render a bill within the identified timeframe

¹⁰ CAUSE-PA Pet. to Intervene & Answer at ¶. 14(a).

¹¹ *Id.* at ¶ 15.

likely caused financial strain on low and moderate income customers, the impact of which may have created compounded injury to the economic stability of its economically vulnerable customers.¹² Based on limited information disclosed by PAWC through informal discovery, CAUSE-PA understands that at least 4,966 of PAWC's *confirmed* low income customers (customers who have affirmatively informed PAWC of their low income status), and potentially thousands of additional *un-confirmed* low income customers, may have been negatively impacted by PAWC's billing errors. Further investigation into the extent of harm caused by PAWC's billing errors, and the adequacy of its proposed relief, is necessary and warranted.

B. Petition to Intervene

21. Admitted.

22. Admitted. By way of further answer, CAUSE-PA notes that PAWC's pleading does not contain a complete restatement of the legal precedent relied upon in CAUSE-PA's intervention.¹³

23. Admitted. By way of further answer, CAUSE-PA notes that PAWC's pleading does not contain a complete restatement of CAUSE-PA's averments regarding its status and membership.¹⁴

24. Admitted in part, denied in part. CAUSE-PA admits that it initially averred and continues to maintain that its members may be directly impacted by the outcome of this proceeding, and that its interests are not adequately represented by other parties.¹⁵ It is denied that

¹² *Id.* at ¶¶ 9, 14-15.

¹³ *Id.* at ¶. 4.

¹⁴ *Id.* at ¶¶ 5-6.

¹⁵ *Id.* at ¶¶ 8-9.

CAUSE-PA based its intervention on 52 Pa. Code § 5.52(a)(2). CAUSE-PA's intervention is based on 52 Pa. Code § 5.72(a)(2).¹⁶

25. Admitted. By way of further answer, CAUSE-PA notes that PAWC's pleading contains only a partial restatement of its claim for representational standing.¹⁷

26. Admitted. See CAUSE-PA response to para. 24, 25, *supra*.

27. Denied. PAWC misstates the nature of CAUSE-PA's averments. CAUSE-PA averred that PAWC's proposed hardship fund contribution "is *likely* inadequate to address the financial hardship resulting from the billing lapse," and that further investigation is needed to determine the extent of harm and the adequacy of PAWC's proposed relief.¹⁸

28. Denied. PAWC misstates the nature of CAUSE-PA's averments. CAUSE-PA questioned the adequacy of PAWC's proposal regarding the application of dunning locks to prevent termination and averred that further investigation is needed to determine the extent of harm and the adequacy of PAWC's proposed relief.¹⁹

29. Admitted. By way of further answer, CAUSE-PA notes that PAWC's pleading contains only a partial restatement of its concerns regarding PAWC's proposal to offer 12-month payment arrangements.²⁰ See CAUSE-PA response to para. 19, *supra*.

30. Admitted. By way of further answer, CAUSE-PA respectfully avers that additional investigation and review are also needed to determine the impacts of PAWC's request for a

¹⁶ *Id.* at ¶¶ 2-10.

¹⁷ *Id.*

¹⁸ *Id.* at ¶ 14(a) (emphasis added).

¹⁹ *Id.* at ¶. 14(b).

²⁰ *Id.* at ¶. 15.

retroactive waiver of the Commission’s billing regulations, and the appropriateness of such a request.²¹

31. Admitted.

C. Argument: CAUSE-PA’s Petition to Intervene specifically explained how its members will be directly, substantially, and immediately impacted by the outcome of this proceeding, and its intervention must be granted.

32. Admitted.

33. Admitted.

34. Admitted.

35. Denied. CAUSE-PA’s Petition to Intervene clearly explains how its members have a direct, substantial, and immediate interest in this proceeding – far beyond a passing interest in PAWC’s compliance with the law. CAUSE-PA’s Petition to Intervene and Answer specifically explains, *inter alia*, that one or more of its members are customers of PAWC, and that “this proceeding could directly affect the ability of CAUSE-PA members to access and maintain affordable water and wastewater service to their home following PAWC’s billing lapse.”²² Low income customers, including members of CAUSE-PA, struggle to afford basic needs, and the receipt of a bill for two months of service can have a profound impact on their ability to pay. As CAUSE-PA’s Petition to Intervene and Answer further explains, PAWC’s proposed remediation measures may be inadequate to address the harm caused to PAWC’s customers – which include one or more CAUSE-PA members – and that PAWC’s billing errors and the relief sought in its Petition will have a direct impact on the accessibility and availability of PAWC’s universal service

²¹ *Id.* at ¶ 16.

²² *Id.* at ¶ 9.

programs relied upon by PAWC’s low and moderate income customers, including members of CAUSE-PA.²³ Specifically, increased demand on PAWC’s hardship fund may erode the availability of assistance to address other hardships not precipitated by PAWC’s billing errors. It may also increase the cost of other universal service programs, impacting both the availability of relief in the future and the overall cost of the programs. Importantly, as PAWC is well aware, CAUSE-PA was an active party in PAWC’s 2020, 2022, and 2023 rate cases, as well as a recent proceeding regarding PAWC’s Arrearage Management Program.²⁴ Each of these cases addressed various aspects of PAWC’s universal service programs, and there are dozens of applicable settlement provisions and Commission orders which may be impacted by aspects of PAWC’s Petition.²⁵

CAUSE-PA denies PAWC’s disdainful contention that its interest in this case is somehow limited to “having others comply with the law.” In so pleading, PAWC evidences a complete disregard for the direct, immediate, and substantial impact of its regulatory compliance on the rights and obligations of its customers. As the courts have made clear, “standing will be found more readily where protection of the type of interest asserted is among the policies underlying the legal rule relied upon by the person claiming to be ‘aggrieved.’”²⁶ In the instant proceeding, PAWC has violated at least one provision of Chapter 56, which was expressly established to enforce “uniform, fair and equitable residential public utility service standards.” 52 Pa. Code § 56.1 (statement of purpose and policy). Contrary to PAWC’s assertions, Chapter 56 not only

²³ *Id.* at ¶ 9.

²⁴ *Pa. PUC v. PAWC*, R-2020-3019369; *Pa. PUC v. PAWC*, R-2022-3031672; *Pa. PUC v. PAWC*, R-2023-3043189; *Pet. of PAWC for Approval of Arrearage Management Plan*, P-2021-3028195.

²⁵ *Pa. PUC v. PAWC*, R-2022-3031672, Joint Petition for Settlement of Rate Investigation at ¶¶ 42-56 (Oct. 11, 2022); *Pet. of PAWC for Approval of Arrearage Management Plan*, P-2021-3028195, Amended Joint Petition for Full Settlement ¶¶ 21-32 (July 27, 2022).

²⁶ *Wm. Penn Parking Garage, Inc. v. City of Pittsburgh*, 464 Pa. 168, 198 (1975).

imposes obligations on public utilities, it also confers both rights and obligations on consumers – including their right to receive a timely bill for services to prevent a cascade of financial and other consequences that could result when charges compound. PAWC’s failure to timely issue a bill for service violated the rights of its customers prescribed under Chapter 56, and – consistent with the above-cited case law – constitutes a direct, substantial, immediate interest for which CAUSE-PA has standing.

As shown above and in CAUSE-PA’s Petition to Intervene and Answer, CAUSE-PA has already specifically explained how its members have a direct, substantial, and immediate interest in the proceeding. Thus, PAWC’s Preliminary Objection No. 1 is without merit and should be denied.

IV. RESPONSE TO PRELIMINARY OBJECTION NO. 2: CAUSE-PA’S PETITION TO INTERVENE DOES NOT CONTAIN IMPERTINENT MATTER, AND PAWC’S PRELIMINARY OBJECTION SHOULD BE DENIED.

36. Admitted.

37. Admitted. By way of further answer, Standard Pennsylvania Practice explains that only if the allegation is wholly irrelevant to the action in every way, and without any influence on the result, will the matter be deemed impertinent.²⁷

38. Admitted. By way of further answer, the Courts have explained the power to grant a preliminary objection premised upon impertinent matter “should be sparingly exercised and only when a party can affirmatively show prejudice.”²⁸ Allegations or averments that relate solely to evidentiary matters, to which the objecting party may otherwise have opportunity to respond,

²⁷ 5 Standard Pennsylvania Practice 2d § 25:61

²⁸ *Breslin v. Mountain View Nursing Home, Inc.*, 171 A.3d 818, 829 (2017), citing *Commonwealth Dep’t of Envtl. Res. v. Hartford Accident and Indem. Co.*, 396 A.2d 885, 888 (1979) (internal citations omitted).

should not be found to be impertinent, and may be regarded as surplusage for purposes of denying preliminary objections.²⁹ Any doubt must be resolved in favor of the non-moving party by refusing to sustain preliminary objections.³⁰

39. Denied. It is denied that 52 Pa. Code § 5.43(a) or any other provision of the Commission's regulations allow for a "retroactive waiver." It is also denied that § 5.43(a) allows for waiver of a utility's tariff provisions. It is denied that CAUSE-PA's Petition to Intervene and Answer contains impertinent matter.

a. It is denied that an investigation to determine the full scope of PAWC's billing issues is impertinent to the current proceeding, as this proceeding was initiated by PAWC *Nunc Pro Tunc* to attempt to retroactively address a lapse in its billing practices that resulted in approximately 96,000 customers not receiving bills. The full scope of PAWC's billing issues is highly pertinent to the current proceeding as it is directly related to PAWC's billing lapse and the relief pursued in PAWC's subsequent *Nunc Pro Tunc* Petition. CAUSE-PA asserts that it would be improper to grant PAWC's Petition without first determining the full scope of the impacts that PAWC's billing errors and retroactive waiver request will have on its customers. Such an inquiry necessitates a close examination of PAWC's recent systems issues.

b. It is denied that an investigation into the adequacy of the proposed relief in PAWC's *Nunc Pro Tunc* Petition is impertinent to the current proceeding. The relief proposed is directly cited by PAWC as support for the Commission to grant its petition. It is thus directly related and pertinent to the matter at hand.

²⁹ *Diess v. Pennsylvania Dep't of Transp.*, 935 A.2d 895, 910 (Pa. Commw. Ct. 2007).

³⁰ *Boyd v. Ward*, 802 A.2d 705 (Pa.Cmwlth. 2002).

c. It is denied that an investigation into the cyber security incident is impertinent to the current proceeding. PAWC has not explained why it deems this matter impertinent. In its Petition, PAWC admits that upgrades to two systems used for billing caused a technical issue that resulted in its billing lapse. PAWC does not deny that the cyber security incident took place. PAWC does not explain whether or not the cyber security incident was related to the system upgrades and technical issues that resulted in the billing lapse that is the subject of the Nunc Pro Tunc Petition for Waiver. Further, the cyber security incident is directly related to the matter at hand to the extent that it resulted in additional billing lapses that compound the impact of the billing lapse addressed in its Nunc Pro Tunc Petition for Waiver. It is also unclear whether the cyber attacks will impact the plan that PAWC sets forth in its Petition. These are all pertinent evidentiary issues that warrant further investigation to ensure that any ordered relief is appropriately structured to account for any changes as a result of the cyber attacks.

40. Denied. See response to paragraph 39, supra. The issues raised in CAUSE-PA's Petition to Intervene are directly relevant to the current proceeding.

41. Denied. See response to paragraphs 37-39, supra. The issues raised in CAUSE-PA's Petition to Intervene are directly relevant to the current proceeding and should be included for consideration.

V. CONCLUSION AND REQUEST FOR RELIEF

WHEREFORE, CAUSE-PA respectfully requests that the Commission deny the Preliminary Objections of Pennsylvania American Water Company.

Respectfully submitted,

PENNSYLVANIA UTILITY LAW PROJECT
Counsel for CAUSE-PA



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Date: November 22, 2024

Verification

I, Elizabeth Marx, Counsel for the Coalition for Affordable Utility Services and Energy Efficiency (“CAUSE-PA”), hereby state on behalf of CAUSE-PA that the facts contained in the foregoing pleading are true and correct to the best of my knowledge, information and belief, that I am duly authorized to make this Verification, and that I expect to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa. C.S. § 4904 (relating to unsworn falsification to authorities).



On behalf of the Coalition for Affordable Utility Services
and Energy Efficiency in Pennsylvania (CAUSE-PA)

Date: November 22, 2024

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

Nunc Pro Tunc Petition of Pennsylvania- :
American Water Company for Limited : Docket No. P-2024-3051518
Waiver of 52 Pa. Code § 56.11(a) and :
Related Tariff Provisions :

Certificate of Service

I hereby certify that I have on this day served copies of the **Answer of the Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania (CAUSE-PA) to the Preliminary Objections of Pennsylvania-American Water Company**, upon the parties of record in the above captioned proceeding in accordance with the requirements of 52 Pa. Code § 1.54.

Via Email

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Respectfully Submitted,
PENNSYLVANIA UTILITY LAW PROJECT
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A handwritten signature in black ink, appearing to read "John W. Sweet", with a horizontal line above it.

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November 22, 2024