

**PENNSYLVANIA
PUBLIC UTILITY COMMISSION
Harrisburg, PA 17105-3265**

Public Meeting held January 8, 2025

Commissioners Present:

Stephen M. DeFrank, Chairman, Statement
Kimberly Barrow, Vice Chair, Dissenting
Kathryn L. Zerfuss
John F. Coleman, Jr.
Ralph V. Yanora

Adoption of Federal Communications Commission
Regulations Pursuant to 52 Pa. Code § 77.4

L-2018-3002672

IMPLEMENTATION ORDER

BY THE COMMISSION:

On October 8, 2024, the Pennsylvania Public Utility Commission (Commission) entered an order at the above-captioned docket adopting in Pennsylvania the Federal Communication Commission's (FCC) regulations codified at 47 C.F.R. §§ 1.1411(c)(4) (relating to information from cyclical pole inspection reports) and 1.1415 (relating to Dispute resolution procedures for pole attachment disputes that impede or delay broadband deployment; functions of the Rapid Broadband Assessment Team) (*October 8, 2024 Order*).¹ In particular, the *October 8, 2024 Order* specified that the Commission adopts 47 C.F.R. § 1.1415 and it shall become effective in Pennsylvania pending the issuance of an implementation order.² Consistent with the *October 8, 2024 Order* and the adoption of 47 C.F.R. § 1.1415, the Commission enters this Implementation Order to establish within the Commission an equivalent to the FCC's Rapid Broadband

¹ *Adoption of Federal Communications Commission Regulations Pursuant to 52 Pa. Code § 77.4*, Pa. PUC Docket No. L-2018-3002672 (October 8, 2024). This order only addresses implementation of 47 C.F.R. § 1.1415. *Id.* at 10-11 (ordering paragraphs 2 and 4).

² *Id.*

Assessment Team (RBAT) and also sets forth expedited Commission dispute resolution procedures applicable to selected pole attachment disputes.

BACKGROUND AND HISTORY OF THE PROCEEDING

On March 18, 2020, the Commission asserted jurisdiction over pole attachments under Section 224(c) of the Communications Act of 1934, 47 USC § 224(c), which allows states to reverse-preempt the FCC’s authority to regulate pole attachments.³ The Commission exercised this authority by promulgating regulations under 52 Pa. Code Chapter 77 to govern the rates, terms and conditions of access to and use of utility poles, ducts, conduits and rights-of way, ensuring that Pennsylvania maintains a framework for overseeing these issues.⁴ Rather than promulgate entirely new regulations, the Commission concluded that it would adopt the FCC’s existing pole attachment regulations, codified at 47 C.F.R. Ch. 1, Subch. A, Pt. 1, Subpt. J (relating to pole attachment complaint procedures), §§ 1.1401–1.1424.⁵ Pursuant to 52 Pa. Code § 77.4(c), any new amendments made by the FCC to the federal pole attachment regulations automatically take effect in Pennsylvania 60 days after the effective date of the federal change unless the Commission publishes a notice in the *Pennsylvania Bulletin* stating that the amendment or modification may not take effect.

On December 15, 2023, the FCC released an order which introduced two significant changes to its pole attachment regulations: (1) the requirement for utilities to provide cyclical pole inspection reports to attachers upon request, and (2) the creation of the Rapid Broadband Assessment Team (RBAT) to facilitate the resolution of pole

³ *Assumption of Commission Jurisdiction Over Pole Attachments from the Federal Communications Commission*, Docket No. L-2018-3002672 (Final Rulemaking Order entered Sep. 3, 2019) (2019 *Final Rulemaking Order*).

⁴ *Id.*

⁵ *Id.* at 10; and see 52 Pa. Code § 77.4(a).

attachment disputes that impede broadband deployment.⁶ In particular, the *FCC Order* substantially revised 47 C.F.R. § 1.1411 to incorporate the pole inspection report requirement, redesignated existing 47 C.F.R. § 1.1415 as 47 C.F.R. § 1.1416, and added a new 47 C.F.R. § 1.1415 (relating to dispute resolution procedures for pole attachment disputes that impede or delay broadband deployment; functions of the RBAT). These federal rule changes became effective on July 25, 2024.

On July 29, 2024, the Commission issued a Secretarial Letter, at Docket No. L-2018-3002672, stating that in accordance with Section 77.4 of its regulations, the FCC's amendments may not automatically take effect in Pennsylvania.⁷ In its Secretarial Letter, the Commission also sought stakeholder comments on whether the FCC's amendments to its federal pole attachment regulations, which would provide pole attachers with more detailed information about the poles they plan to use as part of their broadband buildouts and allow for faster resolution of pole attachment disputes, should become effective in Pennsylvania. Six entities filed comments in response to the Commission's Secretarial Letter.⁸

With its *October 8, 2024 Order*, the Commission adopted the FCC's requirement that utilities provide cyclical pole inspection reports to attachers upon request.⁹ The Commission also ordered the adoption of the FCC amendment at 47 C.F.R. § 1.1415, requiring the development of a RBAT to facilitate expedited dispute resolution

⁶ *In the Matter of Accelerating Wireline Broadband Deployment by Removing Barriers to Infrastructure Investment*, WC Docket No. 17-84, Fourth Report and Order, Declaratory Ruling, and Third Further Notice of Proposed Rulemaking (December 15, 2023). (*FCC Order*).

⁷ The Secretarial Letter was published in the *Pennsylvania Bulletin* on August 10, 2024, 54 Pa.B. 5202.

⁸ Comments in response to the Secretarial Letter were timely filed by the Broadband Cable Association of Pennsylvania (BCAP), CTIA – The Wireless Association (CTIA), Crown Castle Fiber (Crown Castle), Energy Association of Pennsylvania (EAP), FirstEnergy Pennsylvania Electric Company (FirstEnergy), and Verizon.

⁹ *October 8, 2024 Order* at 10 (ordering paragraph 1).

procedures for disputes between pole owners and attachers, pending the issuance of an implementation order.¹⁰

DISCUSSION

Section 1.1415 of the FCC's regulations, 47 C.F.R. § 1.1415, establishes the RBAT for the purposes of making the pole attachment dispute resolution process more responsive and adaptable with the goal of facilitating broadband deployment.¹¹ Section 1.1415 of the FCC's regulations explicitly references Section 1.736 of the FCC's regulations, 47 C.F.R. § 1.736, which outlines the specific procedures for a complainant to have its formal complaint proceeding against a common carrier, or a pole attachment complaint proceeding against a cable television system operator, a utility, or a telecommunications carrier, included on the FCC's "Accelerated Docket." Accelerated Docket proceedings must be concluded within 60 days and are therefore subject to shorter pleading deadlines and other modifications to the FCC's procedural rules that govern its formal complaint proceedings. 47 C.F.R. § 1.736(a). Section 1.1415 of the FCC's regulations also contemplates mediation in some circumstances, pursuant to the FCC's mediation processes set forth at 47 C.F.R. § 1.736 (relating to mediation).

Section 77.4(a) of our regulations states that:

This chapter adopts the rates, terms and conditions of access to and use of utility poles, ducts, conduits and rights-of-way to the full extent provided for in 47 U.S.C. § 224 and 47 CFR Chapter I, Subchapter A, Part 1, Subpart J (relating to pole attachment complaint procedures), inclusive of future changes as those regulations may be amended.

¹⁰ *Id.* at 10-11 (ordering paragraphs 2 and 4).

¹¹ *See FCC Order* ¶ 8.

52 Pa. Code § 77.4(a). Section 77.5(a) of our regulations states that:

Persons and entities subject to this chapter may utilize the mediation, formal complaint and adjudicative procedures under 52 Pa. Code Chapters 1, 3 and 5 (relating to rules of administrative practice and procedure; special provisions; and formal proceedings) of the Commission's regulations to resolve disputes or terminate controversies.

52 Pa. Code § 77.5(a).

Further, Section 77.5(b) of our regulations states that:

Parties before the Commission under this chapter shall employ the procedural requirements in 52 Pa. Code Chapters 1, 3 and 5, [the Public Utility Code], and related Commission precedent except where silent, in which case 47 U.S.C. § 224 or 47 C.F.R. Chapter I, Subchapter A, Part 1, Subpart J (relating to pole attachment complaint procedures) will control.

52 Pa. Code § 77.5(b). Sections 77.4(a), 77.5(a) and 77.5(b) therefore explicitly denote that the Commission's regulations only permit adoption of changes to FCC **pole attachment regulations** and do not specifically permit adoption of FCC **procedural rules**.

Section 1.1415 pertains to pole attachment disputes that allegedly may impede or delay broadband deployment. 47 C.F.R. § 1.1415(a). While Section 1.1415 of the FCC's regulations contains multiple references to the FCC's Accelerated Docket and its implementing regulation, 47 C.F.R. § 1.736, as well as the FCC's mediation regulation, 47 C.F.R. § 1.737, we are not taking action to adopt 47 C.F.R. §§ 1.736 and 1.737. As such, we hereby clarify that the scope of 47 C.F.R. § 1.1415 applies in Pennsylvania only to pole attachment disputes that allegedly may impede or delay broadband deployment and only to the extent that our existing procedural rules are "silent." Accordingly, while we are hereby adopting 47 C.F.R. § 1.1415, we are only incorporating those elements of

the FCC's Accelerated Docket procedural rules set forth in 47 C.F.R. §§ 1.736 and 1.737 to the extent they are consistent with our own existing procedural rules and organizational structure and where necessary to effectuate the purposes of the RBAT and to accelerate broadband deployment, as described below.

Consequently, the Commission does not adopt 47 C.F.R. § 1.736(a), which provides that cases placed on the FCC Accelerated Docket must be concluded within 60 days, meaning that FCC staff must render their initial decision within 60 days of the filing of the complaint. As set forth below, the Commission's existing rules and structure do not support a 60-day time frame to render an initial decision, however, it does permit issuance of a final order within the same overall time frame contemplated by the FCC's Accelerated Docket process.

The Commission also does not adopt 47 C.F.R. § 1.736(b) and (d). These provisions set forth FCC staff's handling of requests for inclusion of a complaint on the Accelerated Docket and are obviated or replaced by 47 C.F.R. § 1.1415. Designated Commission staff will perform the functions outlined therein, consistent with 47 C.F.R. § 1.1415. Additionally, the Commission does not adopt 47 C.F.R. 1.736(f) or (h) through (j), which outline the procedure for complaints that are included on the FCC's Accelerated Docket. The Commission's procedures for complaints selected for expedited treatment are set forth below.

Conversely, the Commission adopts 47 C.F.R. 1.736(c), which provides that "a defendant may submit a request seeking inclusion of the proceeding on the Accelerated Docket" with the provisos (1) that a party submitting a request for expedited treatment shall use a Commission-issued request form to initiate the request, and (2) that the request be directed to designated Commission staff, as set forth below.

The Commission also adopts 47 C.F.R. § 1.736(e), which provides for mediation between the parties after a request for expedited treatment has been filed, but prior to the filing of a formal complaint.

Finally, the Commission adopts 47 C.F.R. § 1.736(g), with the proviso that if the presiding officer assigned to the case determines that continuing to proceed on the Accelerated Docket is no longer appropriate, the presiding officer may remove the matter from the Accelerated Docket upon their own discretion or after consideration of the motion, and any response thereto, of any party. However, we clarify that this portion of 47 C.F.R. § 1.736 is only being adopted for disputes arising under the Commission's pole attachment regulations and only in conjunction with a determination that the dispute be given expedited treatment.

With our applicable regulations and guidance from the FCC's accelerated docket and RBAT procedures in mind, we hereby establish the Commission's Rapid Broadband Assessment Team (PA-RBAT). Below, we outline the FCC's RBAT procedures and establish how the PA-RBAT will be implemented into the Commission's existing procedural framework.

A. Composition and Functions of the PA-RBAT

Section 1.1415 of the FCC's regulations establishes an "inter-bureau" team, including members of various FCC bureaus, to perform the functions of the RBAT. 47 C.F.R. § 1.1415(a). As those respective bureaus do not exist at the Commission, we find that the PA-RBAT will be composed of representatives from: the Office of Administrative Law Judge (OALJ), including at least one Administrative Law Judge, the Legal Division Supervisor (LDS) and at least one member of the Mediation Unit; the Law Bureau; the Bureau of Technical Utility Services (TUS); and the Bureau of Investigations and Enforcement (I&E). Currently, the LDS is responsible for initially reviewing all formal complaints to determine whether they should be assigned to an

Administrative Law Judge (ALJ), Special Agent (SA), or referred to the OALJ Mediation Unit, making the LDS the natural choice to lead the PA-RBAT. Therefore, the LDS will convene the PA-RBAT and coordinate its activities. So constituted, the PA-RBAT will perform the functions of the FCC's RBAT as set forth throughout 47 C.F.R. § 1.1415, subject to the clarifications set forth herein. The LDS will also perform the functions assigned to the FCC Chief of the Enforcement Bureau's Market Disputes Resolution Division (MDRD), as described throughout 47 C.F.R. § 1.1415.

The ALJ as a PA-RBAT member may participate in the settlement process as a settlement judge to help settle disputes. The ALJ as a PA-RBAT member may also serve to adjudicate formal complaints. Given the tight timeframe for the resolution of formal complaints placed in the accelerated process, it is helpful to have an ALJ who is familiar with the dispute from the outset, adjudicating the matter. The PA-RBAT process is conducive for the utilization of the one-judge settlement judge process which is an already established process in the OALJ. By including an ALJ as part of the PA-RBAT, the ALJ is in place to effectively and immediately step into the settlement judge and/or adjudicating judge role as necessary to effectuate the timely resolution and/or adjudication of the parties' claims. The ALJ assigned to the PA-RBAT will preside over the complaint proceeding in the event the PA-RBAT determines PA-RBAT process is appropriate, and the matter does not settle during the mediation process. The Chief Administrative Law Judge does, however, maintain discretion to assign another ALJ to the complaint proceeding if reassignment is needed for any reason, including when the parties request a different ALJ.

B. Eligibility For PA-RBAT Process

Section 1.1415(e) of the FCC's regulations states that the RBAT shall have discretion to decide whether a complaint, or a portion of a complaint, involving a dispute that the complainant party alleges to be impeding or delaying the deployment of broadband facilities is suitable for inclusion on the FCC's Accelerated Docket. 47 C.F.R.

§ 1.1415(e). Section 1.1415(e) of the FCC’s regulations also sets forth a list of eleven factors that the RBAT considers in totality when determining whether to accept a formal complaint, or portion of a formal complaint, on the Accelerated Docket. *Id.* These factors are as follows:

- (1) Whether the prospective complainant states a claim for violation of the [Telecommunications] Act, or a [FCC] rule or order that falls within the [FCC] 's jurisdiction;
- (2) Whether the expedited resolution of a particular dispute or category of disputes appears likely to advance the deployment of broadband facilities or services, especially in an unserved or underserved area;
- (3) Whether the parties to the dispute have exhausted all reasonable opportunities for settlement during any staff-supervised mediation;
- (4) The number and complexity of the issues in dispute;
- (5) Whether the dispute raises new or novel issues versus settled interpretations of rules or policies;
- (6) The likely need for, and complexity of, discovery;
- (7) The likely need for expert testimony;
- (8) The ability of the parties to stipulate to facts;
- (9) Whether the parties have already assembled relevant evidence bearing on the disputed facts;
- (10) Willingness of the prospective complainant to seek a ruling on a subset of claims or issues (*e.g.*, threshold or “test cases”); and
- (11) Such other factors as the RBAT, within its discretion, may deem appropriate and conducive to the prompt and fair adjudication of the complaint proceeding.

Id. We find the eleven factors set forth in Section 1.1415(e) of the FCC's regulations to be comprehensive and hereby direct the PA-RBAT to take them into consideration when determining whether to grant a pole attachment dispute formal complaint expedited consideration under the Commission's PA-RBAT process.

Consistent with 47 C.F.R. § 1.1415(c), we direct OALJ, in collaboration with Law Bureau, to develop a form for requesting expedited treatment under the PA-RBAT process, incorporating the eleven factors from 47 C.F.R. § 1.1415(e). To facilitate submission by a requesting entity, this form will also include the physical mail, email, and telephonic contact information of the LDS and, consistent with 47 C.F.R. § 1.1415(c), direct parties to contact the LDS about their intention to file a request for expedited consideration under PA-RBAT process *prior* to submitting the form. This PA-RBAT process expedited treatment request form will be made publicly available on the Pole Attachment page of the Commission's website.

C. PA-RBAT Determinations of Whether a Dispute Qualifies for Expedited Treatment

If the PA-RBAT determines that a request satisfies the factors for expedited treatment, the PA-RBAT will forward a copy of the request form to the Secretary's Bureau (SEC) which will then become a confidential part of the record. The SEC will then create and assign a case docket for the PA-RBAT process proceeding, noting that it is an expedited matter. The PA-RBAT will then inform the parties in writing that the request has been preliminary granted and provide the parties with the docket number established by SEC. The PA-RBAT will instruct the complaining party to file a formal complaint with SEC, identifying the case as having been selected for expedited treatment and using the docket number provided. Once the formal complaint is filed, SEC will assign the case to OALJ for disposition pursuant to the expedited treatment procedures set forth below.

If the PA-RBAT determines that a request does not satisfy the factors for expedited treatment, the PA-RBAT will inform the requester in writing that their request has been denied, and that they may pursue dispute resolution under the Commission's normal formal complaint procedures. *See* 66 Pa.C.S. §§ 332, 701; 52 Pa. Code §§ 5.21-5.22, 77.5.

D. Mediation

Under Section 1.1415(d) of the FCC's regulations, the FCC's MDRD Chief may refer a pole attachment formal complaint submitted to the RBAT for mediation pursuant to 47 C.F.R. § 1.737. The parties to a pole attachment dispute may also affirmatively seek RBAT-supervised mediation. 47 C.F.R. § 1.1415(d). The MDRD Chief, in consultation with the RBAT, may waive the procedures or requirements of 47 C.F.R. § 1.737 as appropriate in this context, or as needed in light of the facts or circumstances of a particular case. *Id.*

The Commission's Mediation Unit is located within the OALJ. Mediation at the Commission is an informal, nonadjudicative, confidential process through which a Commission-designated mediator assists the parties in an attempt to reach a mutually acceptable resolution. 52 Pa. Code § 1.8.¹² The LDS, in consultation with the Mediation Coordinator, screens formal applications, complaints and petitions assigned to it to determine whether a case might be appropriate for mediation. If a case is appropriate, the Chief ALJ will issue an Interim Order requiring a dispute resolution conference between the parties. This conference may result in a resolution. If not, the parties may request the intervention of a mediator or ask that the case be scheduled for hearing. The Mediation Unit may send a notice to the parties asking them whether they consent to use the mediation process. Additionally, a party may request mediation at any time. We note that the procedural timeline established by Section 332(g) of the Public Utility Code (concerning decisions of administrative law judges) allow cases to be held in abeyance

¹² <https://www.puc.pa.gov/about-the-puc/offices-and-staff-directory/mediation/>.

while the parties engage in mediation. If mediation is not successful, the parties may agree to terminate mediation and return to the normal formal complaint process, at which time the Section 332(g) timeline will resume.

Although the Commission adopted Section 1.1415 of the FCC's regulations in its *October 8, 2024 Order*, we repeat that we do not adopt the FCC's mediation procedures at 47 C.F.R. § 1.737. Any references in 47 C.F.R. § 1.1415 to mediation shall be deemed to signify the Commission's existing mediation processes and procedures, not 47 C.F.R. § 1.737. Accordingly, we direct the PA-RBAT, under coordination of the LDS, to apply OALJ's mediation procedures, and settlement judge procedures, to the PA-RBAT process cases similarly to how they would apply to other matters, including referral to mediation as a prerequisite to acceptance onto the PA-RBAT process accelerated docket.

E. Procedures for Pole Attachment Formal Complaints Designated By the PA-RBAT For Expedited Treatment

The Commission hereby establishes the procedures to follow in cases the PA-RBAT determines are eligible for expedited treatment. First, acknowledging the existing time frame established for ALJ decisions in an on-the-record proceeding, 66 Pa.C.S. § 332(g), but being cognizant of the need for expedited disposition in selected pole attachment disputes, we find it appropriate to establish a modified procedural schedule for these cases whereby the OALJ will schedule an evidentiary hearing within 40 days of the filing of the formal complaint at the expedited docket, and the presiding ALJ will issue a recommended decision within 35 days after the conclusion of the evidentiary hearing.

The process for seeking modification of an ALJ's recommended decision under the FCC's regulations provides a total 40-day comment period, 47 C.F.R. § 1.1736(i). The Commission's existing procedural regulations allow for parties to a formal complaint to file exceptions within twenty days of the issuance of an ALJ's decision, and reply

exceptions to be filed within ten days of the filing of exceptions. *See* 52 Pa. Code §§ 5.533, 5.535-5.536. However, to more effectively facilitate expedited resolution of PA-RBAT process cases, exceptions to the recommended decision shall be filed within ten days from issuance of the decision and reply exceptions shall be filed within five days of the filing of the exceptions. Accordingly, we direct the SEC to include a modified Secretarial Letter which emphasizes the abbreviated exceptions periods, citing to this Implementation Order, when serving parties with the recommended decision. We emphasize that this 15-day revised exception and reply exception schedule applies only to cases designated for expedited treatment under the PA-RBAT process.

If no exceptions are filed, the recommended decision in a PA-RBAT process case will go on the Public Meeting Agenda for Commission consideration. In such cases, the Commission will issue its decision adopting or modifying the recommended decision within 45 days of the recommended decision issue date, for a total timeframe of 120 days (40 days for a hearing, 35 days for a recommended decision, and 45 days for a Commission final decision).

If exceptions are filed, the Commission will issue a final order disposing of the formal complaint within 40 days after the expiration of the period to file reply exceptions to the ALJ's recommended decision in a PA-RBAT process case, for a total timeframe of 130 days (40 days for a hearing, 35 days for a recommended decision, 15 days for exceptions and reply exceptions, and 40 days for a Commission final decision).

Thus, the expedited treatment procedures established herein will resolve pole attachment complaints selected for expedited treatment within 130 days of filing irrespective of whether exceptions are filed. We note that these timeframes are consistent with the FCC's Accelerated Docket overall time frame of 130 days, when comments are

filed.¹³ It also complies with our regulation at 52 Pa. Code § 77.5(d), which requires that the Commission take final action consisting of an order that will issue within 180 days of the filing of a formal complaint initiating a pole attachment dispute as required by 47 U.S.C. § 224(c)(3)(B)(i), except for good cause shown.

CONCLUSION

This Implementation Order, consistent with the FCC's RBAT regulation, 47 C.F.R. § 1.1415, establishes the Commission's process for the expedited resolution of pole attachment disputes that are alleged to impede or delay the deployment of broadband facilities. This Implementation Order also provides detailed instructions for the accelerated procedures that will be used in the disposition of such pole attachment disputes. We believe that this process will help facilitate the timely and efficient deployment of broadband facilities in Pennsylvania. Accordingly, we extend our thanks to our dedicated staff and external stakeholders, who participated by providing comments on the proposed development of this expedited dispute resolution process;

THEREFORE,

IT IS ORDERED:

1. That the Commission establishes a Pennsylvania Rapid Broadband Assessment Team process, thereby adopting Federal Communications Commission's amendment at 47 C.F.R. § 1.1415, requiring the development of a Rapid Broadband Assessment Team to facilitate expedited dispute resolution procedures for disputes between pole owners and attachers, effective as of the date this Order is entered.

¹³ Section 1.736 of the FCC's regulations provides 60 days for a staff decision, 40 days for comments to the staff decision and, when comments are filed, 30 days for the FCC to issue a final decision, for a total of 130 days.

2. That within 45 days of the entry of this Implementation Order, the Office of Administrative Law Judge, with assistance from the Law Bureau, will develop a form for pole owners and attachers to submit to request participation in the Commission's Pennsylvania Rapid Broadband Assessment Team Process, which will be made available on the Commission's website at the Pole Attachment page.

3. That all attachers, electric distribution companies, telecommunications companies, and pole attachments owners adhere to the guidelines for accelerated pole attachment dispute resolution identified in this Implementation Order.

4. That this Implementation Order be published in the *Pennsylvania Bulletin* and served upon the members of the Commission's Pole Attachment Working Group, all jurisdictional fixed utility service providers, the Pennsylvania Telephone Association, the Broadband Cable Association of Pennsylvania, the Energy Association of Pennsylvania, The Pennsylvania Wireless Association, all jurisdictional Competitive Access Providers, the Office of Consumer Advocate, the Office of Small Business Advocate, the Commission's Bureau of Investigation and Enforcement, and all other parties that filed comments at Docket No. L-2018-3002672, Adoption of Federal Communications Commission Regulations Pursuant to 52 Pa. Code § 77.4.

5. That a copy of this Implementation Order will be posted on the Commission's website at the Pole Attachments page.

6. That the contact persons for this Implementation Order are Colin W. Scott, Assistant Counsel, (717) 787-5959 or colinscott@pa.gov, and Tiffany L. Tran, Assistant Counsel, (717) 783-5413 or tiffran@pa.gov.

BY THE COMMISSION



Rosemary Chiavetta
Secretary

(SEAL)

ORDER ADOPTED: January 8, 2025

ORDER ENTERED: January 8, 2025