

**Michael J. Shafer**  
Senior Counsel

**PPL**  
Two North Ninth Street  
Allentown, PA 18101-1179  
Tel. 610.774.2599 Fax 610.774.4102  
MJShafer@pplweb.com



**E-File**

November 6, 2020

Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street, 2<sup>nd</sup> Floor North  
P.O. Box 3265  
Harrisburg, PA 17120-3265

**Re: Answer of PPL Electric Utilities Corporation to the Joint Petition for  
Clarification of TURN and CAUSE-PA et al.  
Docket No. M-2020-3019244**

---

Dear Secretary Chiavetta:

Enclosed for filing on behalf of PPL Electric Utilities Corporation ("PPL Electric") is PPL Electric's Answer to the Joint Petition for Clarification in the above referenced docket.

Pursuant to 52 Pa. Code § 1.11, the enclosed document is to be deemed filed on November 6, 2020 which is the date it was filed electronically using the Commission's E-filing system.

If you have any questions, please do not hesitate to contact me.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "Michael J. Shafer", written over a light blue horizontal line.

Michael J. Shafer

Enclosure

cc: Certificate of Service



## TABLE OF CONTENTS

	<u>Page</u>
I. INTRODUCTION AND BACKGROUND .....	1
II. ARGUMENT .....	3
A. THE COMMISSION SHOULD DENY CERTAIN OF THE PROPOSALS SET FORTH IN THE LOW INCOME ADVOCATES' JOINT PETITION FOR CLARIFICATION .....	3
1. Obligation to Apply for All Available Assistance .....	3
2. Additional 10-Day Communication Provisions.....	4
3. Protected Customer Income, Verification, and Flexibility .....	6
4. Medical Certifications.....	7
5. Coordination with Winter Moratorium.....	7
6. Victims of Domestic Violence.....	8
7. Availability and Resolution of Complaints.....	10
III. CONCLUSION.....	12

PPL Electric Utilities Corporation (“PPL Electric” or the “Company”), pursuant to 52 Pa. Code §§ 5.61 and 5.572, hereby respectfully submits this Answer to the Joint Petition for Clarification filed by the Tenant Union Representative Network (“TURN”), the Action Alliance of Senior Citizens of Greater Philadelphia (“Action Alliance”), and the Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania (“CAUSE-PA”) (collectively, “Low Income Advocates”) on October 27, 2020. In the Joint Petition, the Low Income Advocates request clarification of various portions of the Pennsylvania Public Utility Commission’s (“Commission”) October 13, 2020 Order, which established a Phase 2 of the Termination Moratorium in response to the coronavirus disease 2019 (“COVID-19”) pandemic. According to the Low Income Advocates, these provisions in the October 13, 2020 Order “are not further defined and left subject to misinterpretation.” (Joint Petition, p. 5.)

Through this Answer, PPL Electric responds to the Low Income Advocates’ requests for clarification. As explained herein, the Company opposes some of their proposals, while not opposing others. Thus, the Company respectfully requests that the Commission reject certain of the Low Income Advocates’ proposals as set forth in this Answer.

## **I. INTRODUCTION AND BACKGROUND**

PPL Electric is a public utility that provides electric distribution and provider of last resort services in Pennsylvania subject to the regulatory jurisdiction of the Commission. PPL Electric furnishes electric distribution, transmission, and provider of last resort electric supply services to approximately 1.4 million customers throughout its certificated service territory, which includes all or portions of 29 counties and encompasses approximately 10,000 square miles in eastern and central Pennsylvania.

1. On March 13, 2020, Chairman Brown Dutrieuille issued an Emergency Order prohibiting public utilities in Pennsylvania from terminating service and directing them to reconnect customers' service that was previously terminated, provided that such reconnections could be safely performed. The Emergency Order was ratified by the Commission at the March 26, 2020 public meeting.

2. Since March 13, 2020, PPL Electric has not terminated any customer's electric service and worked diligently to reconnect customers' service that was previously terminated in a safe and reasonable manner.

3. On August 5, 2020, the Low Income Advocates filed their Joint Petition for Due Process Relief, requesting that the Commission initiate a separate on-the-record proceeding to investigate whether the termination moratorium should continue and to address the related impacts of the coronavirus ("COVID-19").

4. On August 10, 2020, Chairman Brown Dutrieuille issued a letter at Docket No. M-2020-3019244, requesting comments about the termination moratorium and the customer protections for at-risk customers should the termination moratorium be lifted.

5. On or about August 18, 2020, PPL Electric and several other interested parties, including the Low Income Advocates, filed Comments in response to the August 10, 2020 letter.

6. On August 25, 2020, PPL Electric and several other interested parties filed Answers to the Low Income Advocates' Joint Petition for Due Process Relief.

7. On September 17, 2020, the Commission entered an Order dismissing the Low Income Advocates' Joint Petition for Due Process Relief as moot.

8. On October 13, 2020, the Commission entered an Order establishing Phase 2 of the Termination Moratorium.

9. On October 27, 2020, the Low Income Advocates filed their Joint Petition for Clarification of the Commission’s October 13, 2020 Order.

10. For the reasons explained below, the Commission should deny certain of the proposals set forth in the Low Income Advocates’ Joint Petition for Clarification.

## **II. ARGUMENT**

### **A. THE COMMISSION SHOULD DENY CERTAIN OF THE PROPOSALS SET FORTH IN THE LOW INCOME ADVOCATES’ JOINT PETITION FOR CLARIFICATION**

#### **1. Obligation to Apply for All Available Assistance**

11. For a “protected customer” to “receive protection from termination” under the October 13, 2020 Order, the Commission required that the protected customer “apply for all Assistance Programs for which the customer is eligible.” (October 13, 2020 Order, p. 4.)

12. The Low Income Advocates believe that “without substantial clarification,” this requirement “imposes an unworkable and unprecedented burden on customers.” (Joint Petition, p. 11.)

13. Therefore, the Low Income Advocates propose that the Commission: (1) “[r]equire utilities to appropriately inform, evaluate, and assist consumers in applying for available assistance programs”; (2) “[r]equire utilities to accept a customer’s verbal attestation that they have applied for available assistance programs”; (3) “[d]efine the phrase ‘all available Assistance Programs’ as those programs offered by the utility seeking to terminate the customer, for which the customer would be eligible.” (Joint Petition, p. 12.)

14. Although PPL Electric does not oppose the first and third proposals, the Company disagrees with the second proposal, which would require utilities to accept a customer’s verbal attestation that the customer has applied for available assistance programs.

15. PPL Electric is concerned about solely relying on customers' verbal attestations to determine if they have actually applied for the Company's available assistance programs.

16. Since the customer would apply for PPL Electric's available assistance programs through the Company, PPL Electric should rely on its own records of whether a customer has, in fact, applied for its available assistance programs, rather than relying on the customer's verbal attestation.

17. If PPL Electric knows that a customer has not applied for its available assistance programs, the customer's verbal attestation should not control.

18. Thus, the Commission should reject the Low Income Advocates' second proposed change to the October 13, 2020 Order's provisions that require protected customers to apply for all available assistance programs.

## **2. Additional 10-Day Communication Provisions**

19. In the Commission's October 13, 2020 Order, the Commission required utilities to send at least one communication to any customer whose unpaid balance would put the customer at risk of termination after the moratorium is lifted. This additional communication would be sent to the customer at least 10 days before the standard 10-day termination notice is issued. The communication must: (1) "inform the customer that they are at-risk of service termination after the moratorium is lifted (November 9, 2020)"; (2) "indicate a general time range when the customer will likely be terminated unless the customer takes appropriate steps"; and (3) "inform the customer of available options including the customer's right to file an informal complaint with the Commission if the customer is not satisfied with the arrangement offered by the utility." (October 13, 2020 Order, p. 4.)

20. The Low Income Advocates propose multiple changes to the Commission's provisions governing the additional 10-day communication. Specifically, they request that the

Commission: (1) “[r]equire that the additional 10-day communication be written, detailed, and accessible”; (2) “[p]rovide a standardized, model 10-day communication to be adapted by each utility to include information about the specific Assistance Programs the utility provides”; and (3) “[i]f the additional 10-day communication requirement is intended to benefit small business customers and apply to telecommunications utilities, the Commission should clarify the notice timing under the termination standards applicable to those customers and utilities.” (Joint Petition, pp. 14-15.)

21. Regarding the first proposal, PPL Electric already assumed that the Company would send the additional 10-day communication to customers in writing.

22. Moreover, to make the communication more accessible to Spanish speaking customers, PPL Electric will add a line in Spanish to the communication notice that provides details on the Company’s available Spanish language resources if they do not speak English.

23. As for the Low Income Advocates’ second proposal for the Commission to provide a standardized, model 10-day communication, PPL Electric does not believe it is necessary.

24. At the request of the Commission’s Bureau of Consumer Services (“BCS”), the Company already submitted a draft of the additional 10-day communication for review.

25. PPL Electric believes that process will be more than sufficient to ensure that the Company’s additional 10-day communication is easily understood and meets the requirements set forth in the October 13, 2020 Order.

26. Finally, PPL Electric has no comment on the Low Income Advocates’ third proposal regarding the additional 10-day communication.



### 3. Protected Customer Income, Verification, and Flexibility

27. The Commission's October 13, 2020 Order provides that "[u]tilities and the Commission's Bureau of Consumer Services shall accept income verification and business status information obtained through flexible means, for example, over-the-phone or via electronic mail, for the purpose of qualifying customers for protected status, payment arrangements, or universal service programs." (October 13, 2020 Order, p. 5.)

28. In their Joint Petition, the Low Income Advocates propose that the Commission: (1) "[r]equire utilities and BCS to accept verbal, over-the-phone verification of income from all customers"; (2) "[r]equire utilities to apply 'protected customer' status to all residential customers for which the utility has information indicating that they have income at or below 300% FPIG"; and (3) "[r]equire utilities and BCS to affirmatively request income and household composition information prior to termination to determine whether customers are protected from termination or otherwise eligible for protections pursuant to the October 13 Order." (Joint Petition, p. 16.)

29. The first proposal is problematic in the context of the Company's available assistance programs. For example, PPL Electric requires customers to provide written income information in order to enroll in the Company's Customer Assistance Program ("CAP"), also called "OnTrack." PPL Electric maintains that written verification of income eligibility helps ensure that those customers qualify for those programs, and the Low Income Advocates' proposal should not disturb that requirement.

30. As to the second proposal, PPL Electric will use the income information it already has on file to determine which of its customers qualify for "protected customer" status. Therefore, the Company does not oppose that proposal.

31. Lastly, the Company does not oppose the third proposal. PPL Electric already plans on affirmatively requesting income and household composition information prior to termination. Specifically, the Company's draft additional 10-day communication requests that the customer contact the Company to verify the customer's income and household composition.

#### **4. Medical Certifications**

32. The Commission's October 13, 2020 Order states that "[u]tilities shall accept at least two additional medical certificates for eligible customers who may have otherwise exhausted the three available in 52 Pa. Code §§ 56.111-56.118, 56.351-56.358." The Commission also allots an additional 7 days for medical professionals to return the medical certificates to the utility "[b]ecause medical professionals may be dealing with increased patient loads." Further, the Order specifies that "[m]edical certificates on the doctor's/medical facility's letterhead will be accepted." (October 13, 2020 Order, p. 5.)

33. In their Joint Petition, the Low Income Advocates request several clarifications regarding the additional medical certificates. First, they ask the Commission to "[c]larify that the new medical certification opportunities in the October 13 Order are available to restore service." (Joint Petition, p. 18.) The Low Income Advocates also want the Commission to "[c]larify that any writing that includes the required elements of a medical certificate, *whether or not on letterhead*, satisfies the Commission's existing regulations and must be accepted by a utility." (Joint Petition, p. 18.) Finally, the Low Income Advocates ask that the Commission "[c]larify that a utility should not count a medical certification against a customer's medical certification limit if the certification is submitted during a period when the customer's service is otherwise protected from termination." (Joint Petition, p. 18.)

34. PPL Electric does not oppose these requested clarifications.

#### **5. Coordination with Winter Moratorium**

35. The Low Income Advocates also recommend that the Commission clarify the October 13, 2020 Order “to affirm that the existing, statutory winter moratorium protection remains in place” and to “direct the additional ten day communication to include information on the winter moratorium.” (Joint Petition, p. 18.)

36. PPL Electric does not oppose this recommendation, as the Company already was operating with the understanding that the Commission’s October 13, 2020 Order did not affect the applicability of the winter termination moratorium.

## **6. Victims of Domestic Violence**

37. The Low Income Advocates state that “[t]he October 13 Order does not explicitly recognize that victims of domestic violence may be entitled to more lenient standards than those provided in Chapter 14 of the Public Utility Code.” (Joint Petition, p. 19.) They also assert that the Commission’s Order “fails to properly account for the specific statutory recognition that victims should be afforded additional protections from utility terminations.” (Joint Petition, p. 20.) As a result, the Low Income Advocates make the following recommendations: (1) “[v]ictims of domestic violence are ‘protected customers’ within the meaning of the October 13 Order, without any requirement to apply for additional assistance”; (2) “[u]tilities and BCS will accept verbal attestation that a customer is a victim of domestic violence for purposes of providing the protections in the October 13 Order”; and (3) “upon contact from a residential customer eligible for termination, utilities and BCS are required to inquire whether the customer is a victim of domestic violence.” (Joint Petition, p. 20.)

38. PPL Electric recognizes the extreme hardship faced by victims of domestic violence, especially during the COVID-19 pandemic.

39. As a result, the Company supports the Low Income Advocates' first proposal for victims of domestic violence to be considered "protected customers" under the Commission's October 13, 2020 Order.

40. The second proposal, however, appears to go beyond existing protections for victims of domestic violence, which require written documentation to establish such protections. *See, e.g.,* 52 Pa. Code §§ 56.1(b), 56.36(b)-(c), 56.91(b)(11). The Company continues to believe that this written documentation should still be provided for such customers to qualify as "protected customers."

41. Removing the requirement to provide written documentation that a customer is a victim of domestic violence will require PPL Electric to make judgment calls as to which situations would qualify as domestic violence. PPL Electric employees are not equipped to make these decisions, which is why the regulations require documentation from a court which has competent expertise in determining whether someone is a victim of domestic violence.

42. Likewise, the Company does not believe that the third proposal is necessary. PPL Electric's termination notices already provide information on the special protections that are available to victims of domestic violence. If the customer feels comfortable volunteering that information to PPL Electric and provides the supporting written documentation, the Company will ensure that all applicable protections on the account are put in place. However, PPL Electric is concerned about verbally inquiring about domestic violence on calls with the customers, especially when the customer does not first volunteer that information. For example, the customer could be making the call in the vicinity of the potential abuser when contacting the Company. Thus, the Company believes that the Commission should not adopt the third proposal.

## 7. Availability and Resolution of Complaints

43. In the October 13, 2020 Order, the Commission stated that “a protected customer denied a stay by the utility may file a complaint with the Commission for review of the utility’s decision.” (October 13, 2020 Order, p. 15.)

44. The Low Income Advocates ask the Commission to clarify that: (1) “[c]ustomers may dispute not only utility termination efforts, but also the imposition of utility late payment, connection and reconnection charges, and deposit demands”; and (2) “[i]n the context of a consumer complaint, BCS should direct the applicable utility to assess whether the complainant is a ‘protected customer’ and report that information to the BCS investigator to expedite resolution of complaints.” (Joint Petition, p. 21.)

45. The Low Income Advocates’ requested clarifications are unnecessary.

46. First, Sections 308.1(a) and 701 of the Public Utility Code already permit customers to file informal and formal complaints, respectively, concerning alleged violations of the Public Utility Code, the Commission’s regulations, and the Commission’s orders. Nothing in the October 13, 2020 Order can be read as altering the rights of customers to file informal or formal complaints concerning any legal obligations by utilities, including the requirements set forth in the Commission’s October 13, 2020 Order. If a customer believes that a utility has violated any aspect of the October 13, 2020 Order, the customer can file an informal or formal complaint.

47. Second, the issue of whether a customer is a “protected customer” is not going to arise in every informal complaint filed with BCS. If a customer disputes the utility’s determination that they do not qualify as a “protected customer,” such information will be presented by the utility in the BCS proceeding. However, it is a waste of time and resources for BCS to direct the utility to assess the “protected customer” qualifications of the customer and to

provide that information to the BCS investigator, when the informal complaint may have nothing to do with that issue specifically or any other related issue.

48. For these reasons, the Low Income Advocates' Joint Petition for Clarification should be denied in part.

### **III. CONCLUSION**

WHEREFORE, for all the foregoing reasons, PPL Electric Utilities Corporation respectfully requests that the Pennsylvania Public Utility Commission deny in part the Joint Petition for Clarification filed by the Tenant Union Representative Network (TURN), the Action Alliance of Senior Citizens of Greater Philadelphia (Action Alliance), and the Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania (CAUSE-PA).

Respectfully submitted,



\_\_\_\_\_  
Kimberly A. Klock (ID # 89716)

Michael J. Shafer (ID # 205681)

PPL Services Corporation

Office of General Counsel

Two North Ninth Street

Allentown, PA 18106

Phone: 610-774-4254

Fax: 610-774-6726

E-mail: [kklock@pplweb.com](mailto:kklock@pplweb.com)

[mjshafer@pplweb.com](mailto:mjshafer@pplweb.com)

Date: November 6, 2020

Attorneys for PPL Electric Utilities Corporation

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Emergency Order

:  
: Docket No. M-2020-3019244  
:

**CERTIFICATE OF SERVICE**

I hereby certify that I have, on this day, served true and correct copies of the Answer of PPL Electric Utilities Corporation to the Joint Petition for Clarification of TURN et al. and CAUSE-PA in the above captioned matter upon the following persons and in accordance with the requirements of 52 Pa. Code § 1.54, as modified by the Commission's March 20, 2020 Emergency Order.

**VIA ELECTRONIC MAIL**

Terrance J. Fitzpatrick  
Donna M.J. Clark  
Energy Association of Pennsylvania  
800 North Third Street, Suite 205  
Harrisburg, PA 17102  
[tfitzpatrick@energypa.org](mailto:tfitzpatrick@energypa.org)  
[dclark@energypa.org](mailto:dclark@energypa.org)

Robert Ballenger, Esq.  
Joline Price, Esq.  
Josie B.H. Pickens, Esq.  
Community Legal Services  
1424 Chestnut Street  
Philadelphia, PA 19102-2505  
[rballenger@clsphila.org](mailto:rballenger@clsphila.org)  
[jpickens@clsphila.org](mailto:jpickens@clsphila.org)  
[jprice@clsphila.org](mailto:jprice@clsphila.org)

Christy Appleby, Esq.  
Office of Consumer Advocate  
555 Walnut Street  
5<sup>th</sup> Floor, Forum Place  
Harrisburg, PA 17101-1923  
[cappleby@paoca.org](mailto:cappleby@paoca.org)

Elizabeth R. Marx, Esq.  
Ria M. Pereira, Esq.  
John W. Sweet, Esq.  
Pennsylvania Utility Law Project  
118 Locust Street  
Harrisburg, PA 17101  
[pulp@palegalaid.net](mailto:pulp@palegalaid.net)

Steven Gray, Esq.  
Office of the Small Business Advocate  
555 Walnut Street  
1<sup>st</sup> Floor, Forum Place  
Harrisburg, PA 17101  
[sgray@pa.gov](mailto:sgray@pa.gov)

Anthony D. Kanagy, Esq.  
17 North Second Street, 12<sup>th</sup> Floor  
Harrisburg, PA 17101-1601  
[akanagy@postschell.com](mailto:akanagy@postschell.com)  
[ksitler@postschell.com](mailto:ksitler@postschell.com)

Brook Bogaczyk  
1775 Industrial Blvd.  
Lewisburg, PA 17837  
[bogaczykb@citizenselectric.com](mailto:bogaczykb@citizenselectric.com)



Richard Kanaskie, Esq.  
Bureau of Investigation and Enforcement  
Pennsylvania Public Utility Commission  
PO Box 3265  
Harrisburg, PA 17105-3265  
[rkanaskie@pa.gov](mailto:rkanaskie@pa.gov)

Amy E. Hirakis, Esq.  
Columbia Gas  
800 North 3<sup>rd</sup> Street, Suite 204  
Harrisburg, PA 18101  
[ahirakis@nisource.com](mailto:ahirakis@nisource.com)

Bill Johnston-Walsh  
AARP Pennsylvania  
30 North 3<sup>rd</sup> Street #750  
Harrisburg, PA 17101  
[pa@aarp.org](mailto:pa@aarp.org)

Charles E. Thomas III  
PA Rural Electric Association  
212 Locust Street, Suite 100  
Harrisburg, PA 17101  
[Charles\\_thomas@ccsenergy.com](mailto:Charles_thomas@ccsenergy.com)

Craig W. Berry, Esq.  
Philadelphia Gas Works  
800 W. Montgomery Avenue  
Philadelphia, PA 19122  
[Craig.berry@pgworks.com](mailto:Craig.berry@pgworks.com)

Emily M. Farah, Esq.  
Michael Zimmerman, Esq.  
Tishekia Williams, Esq.  
Lindsay Baxter  
Duquesne Light Company  
411 Seventh Avenue  
Pittsburgh, PA 15219  
[efarah@duqlight.com](mailto:efarah@duqlight.com)  
[editommaso@duqlight.com](mailto:editommaso@duqlight.com)  
[lbaxter@duqlight.com](mailto:lbaxter@duqlight.com)  
[mzimmerman@duqlight.com](mailto:mzimmerman@duqlight.com)  
[twilliams@duqlight.com](mailto:twilliams@duqlight.com)

Erik Ross  
Milliron & Goodman  
200 North Third Street  
Suite 1500  
Harrisburg, PA 17101  
[erik@millirongoodman.com](mailto:erik@millirongoodman.com)

Ward L. Smith, Esq.  
Exelon Business Services Corp.  
Legal Department S23-1  
2301 Market Street  
Philadelphia, PA 19103  
[Ward.smith@exeloncorp.com](mailto:Ward.smith@exeloncorp.com)  
[Amy.botak@exeloncorp.com](mailto:Amy.botak@exeloncorp.com)

Kim McConnell  
John Hollenbach  
United Water  
4211 East Park Circle  
Harrisburg, PA 17111  
[Kim.mcconnell@unitedwater.com](mailto:Kim.mcconnell@unitedwater.com)  
[John.hollenbach@unitedwater.com](mailto:John.hollenbach@unitedwater.com)

Lauren M. Burge, Esq.  
Eckert Seamans Cherin & Mellott LLC  
600 Grant Street, 44<sup>th</sup> Floor  
Pittsburgh, PA 15219  
[lburge@eckertseamans.com](mailto:lburge@eckertseamans.com)

Pamela C. Polacek, Esq.  
McNees Wallace & Nurick  
100 Pine Street  
PO Box 1166  
Harrisburg, PA 17108-1166  
[ppolacek@mcneeslaw.com](mailto:ppolacek@mcneeslaw.com)  
[lcharleton@mcneeslaw.com](mailto:lcharleton@mcneeslaw.com)

Danielle Jouenne, Esq.  
UGI Corporation  
460 North Gulph Road  
King of Prussia, PA 19406  
[jouenned@ugicorp.com](mailto:jouenned@ugicorp.com)

Emma Horst Martz  
PennPIRG  
1429 Walnut Street, Suite 1100  
Philadelphia, PA 19102  
[emma@pennpirg.org](mailto:emma@pennpirg.org)

Thomas Schuster  
Sierra Club  
PO Box 51  
Windber, PA 15963  
[Tom.schuster@sierraclub.org](mailto:Tom.schuster@sierraclub.org)

Jennifer Petrisek, Esq.  
375 North Shore Drive  
Pittsburgh, PA 15212  
[Jennifer.petrisek@peoples-gas.com](mailto:Jennifer.petrisek@peoples-gas.com)

Mark Szybist, Esq.  
Josue Aguilar  
NRDC  
1152 15<sup>th</sup> Street NW, Suite 300  
Washington, DC 20005  
[mszybist@nrdc.org](mailto:mszybist@nrdc.org)

Mary McFall Hopper, Esq.  
Aqua Pennsylvania  
762 W. Lancaster Avenue  
Bryn Mawr, PA 19010  
[mmhopper@aquaamerica.com](mailto:mmhopper@aquaamerica.com)

Suzan D. Paiva, Esq.  
Verizon  
900 Race Street, 6<sup>th</sup> Floor  
Philadelphia, PA 19107  
[Suzan.D.Paiva@verizon.com](mailto:Suzan.D.Paiva@verizon.com)

Tori L. Giesler, Esq.  
FirstEnergy  
2800 Pottsville Pike  
PO Box 16001  
Reading, PA 19612-6001  
[tgiesler@firstenergycorp.com](mailto:tgiesler@firstenergycorp.com)

Steven J. Samara  
Pennsylvania Telephone Association  
300 N. 3<sup>rd</sup> Street, Suite 780  
Harrisburg, PA 17101  
[Steve.samara@patel.org](mailto:Steve.samara@patel.org)


Thomas J. Sniscak, Esq.  
Whitney E. Snyder, Esq.  
Hawke McKeon and Sniscak LLP  
100 N. Tenth Street  
Harrisburg, PA 17101  
[tjsniscak@hmslegal.com](mailto:tjsniscak@hmslegal.com)  
[wesnyder@hmslegal.com](mailto:wesnyder@hmslegal.com)  
[daschreffler@hmslegal.com](mailto:daschreffler@hmslegal.com)

**VIA FIRST CLASS MAIL**

Josh Shapiro, Attorney General  
Commonwealth of Pennsylvania  
Strawberry Square  
Harrisburg, PA 17120

Mayor James F. Kenney  
Office of the Mayor  
215 City Hall  
Philadelphia, PA 19107

Date: November 6, 2020

  
\_\_\_\_\_  
Kimberly A. Klock (ID #89716)  
Michael J. Shafer (ID #205681)  
PPL Services Corporation  
Office of General Counsel  
Two North Ninth Street  
Allentown, PA 18106