COMMONWEALTH OF PENNSYLVANIA
PENNSYLVANIA PUBLIC UTILITY COMMISSION
COMMONWEALTH KEYSTONE BUILDING
400 NORTH STREET, HARRISBURG, PA 17120

BUREAU OF
INVESTIGATION
&
ENFORCEMENT
3038060

March 19, 2024

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

Re: Pennsylvania Public Utility Commission, Bureau of Investigation and Enforcement's Investigation of PPL Electric Utilities Corporation for potential violations of 52 Pa. Code § 56.1, *et seq.,* of the Commission's regulations and 66 Pa.C.S. § 1501 of the Public Utility Code
Docket No. M-2023-3038060
I&E Reply Comments

Dear Secretary Chiavetta:

Enclosed for electronic filing is the **Reply Comments of the Bureau of Investigation and Enforcement** in the above-referenced matter.

Copies have been served on the parties of record and interested parties in accordance with the Certificate of Service. If you have any questions, please do not hesitate to contact me.

Sincerely,

Michael L. Swindler
Deputy Chief Prosecutor
Bureau of Investigation and Enforcement
PA Attorney ID No. 43319
(717) 783-6369
mswindler@pa.gov

MLS/ac
Enclosures

cc: Office of Special Assistants (*via email only – ra-OSA@pa.gov – Word Version*)
Per Certificate of Service

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISISON

Pennsylvania Public Utility Commission, Bureau of Investigation and Enforcement	: :	
v.	:	Docket No. M-2023-3038060
PPL Electric Utilities Corporation	:	

REPLY COMMENTS OF THE
BUREAU OF INVESTIGATION AND ENFORCEMENT

TO THE HONORABLE PENNSYLVANIA PUBLIC UTILITY COMMISSION:

I. INTRODUCTION

On November 21, 2023, pursuant to 52 Pa. Code §§ 3.113(b)(3), 5.41 and 5.232, the Pennsylvania Public Utility Commission's ("Commission" or "PUC") Bureau of Investigation and Enforcement ("I&E") and PPL Electric Utilities Corporation ("PPL" or "Company") filed a Joint Petition for Approval of Settlement ("Settlement" or "Settlement Agreement") at the above docket to amicably resolve I&E's informal investigation regarding a system-wide billing issue discovered in December 2022. I&E's investigation was initially based upon information provided by the Commission's Bureau of Consumer Services ("BCS"), supplemented by I&E's own investigation which resulted in a Settlement comprised of a substantial monetary civil penalty and numerous remedial measures— both monetary and non-monetary—as set forth therein and as supported by accompanying Statements in Support expressing the individual views of I&E and PPL.

From its Public Meeting held January 18, 2024, the Commission entered an Order to seek public comment on the Settlement Agreement, consistent with the requirement imposed in 52 Pa. Code § 3.113(b)(3), before issuing its Final Order ("January 18 Order"). Pursuant to the January 18 Order, interested parties had twenty-five (25) days following publication of the January 18 Order in the *Pennsylvania Bulletin* to submit comments. The January 18 Order was published in the *Pennsylvania Bulletin* on February 3, 2024.[1] Accordingly, comments were due on or before February 28, 2024. Numerous comments were filed.

I&E now files the instant Reply Comments consistent with the Commission's recent ruling in *I&E v. Great American Power* where it stated:

> [T]he Commission has not rejected the filing of reply comments or similar responsive filings if they are filed in a reasonable time and in compliance with our procedural regulations . . . Therefore, we encourage entities, including I&E, if it so chooses, to pursue procedural compliant methods to make appropriate filings, such as replies to comments in settlement proceedings. *Pennsylvania Public Utility Commission, Bureau of Investigation and Enforcement v. Great American Power, LLC*, Docket No. M-2023-3020643 (Order entered September 21, 2023).

I&E deemed it prudent to file the instant Reply Comments to be responsive to the filing of comments by interested parties, to further support this Settlement Agreement. Despite the numerous challenges and requests set forth by commenters submitting comments pursuant to the Settlement's publication in the *Pennsylvania Bulletin*, it remains I&E's unwavering position that the Parties have provided the support necessary

[1] 54 Pa.B. 592 (Feb. 3, 2024).

to warrant a Commission finding that the Settlement Agreement is fair, just, reasonable and in the public interest, and should be approved in its entirely without modification.

II. REPLY COMMENTS

I&E appreciates that an opportunity was provided to "interested parties" to comment on the Settlement reached between I&E and PPL. It was not unexpected that these comments would contain varying opinions on the terms reached in the Settlement with some suggesting terms that were not included in the Settlement. However, the benchmark of successful negotiations is the compromise of competing positions. I&E and PPL invested many hours crafting terms that would result in a successful resolution. In the end, does it result in satisfying every desire of every commenter? No. Is this Settlement nevertheless in the public interest? Without question.

A. Summary of Comments

The comments filed to the Settlement Agreement were wide ranging. Some commenters suggested modifications to the Settlement. Some commenters supported the Settlement. Many comments failed to even address the Settlement. Out of all the commenters, the largest group was comprised of individual PPL customers. I&E reviewed each comment and will address the range of issues, as well as provide a brief overview of customer sentiment.

There were 163 comments submitted.[2] Out of the total number of comments, 102, **over sixty percent** did not actually direct their comments to the terms of the Settlement,

[2] Out of the 163 Comments submitted, seven of the Comments were received by the Secretary's Bureau after the comment submission deadline of February 28, 4:30 p.m. These Comments were stamped by the Secretary's Bureau with their date of receipt.

but rather shared personal billing issues or concerns about PPL. Such comments, while constructive in PPL's efforts to accommodate the concerns of these customers, are unrelated to the details of this Settlement and a determination of whether the instant Settlement is in the "public interest." As such, this sixty percent of commenters did not oppose the Settlement. Rather than negatively impact this carefully crafted settlement, it should be recognized that these customers have always been afforded the opportunity to file informal or formal complaints with the Commission to address any grievances they may wish to address related to their PPL billing experiences. This process, available to all customers, is a more productive avenue for resolution of their individual concerns. Out of the remaining customers, 61 addressed the Settlement in some form.

The largest group that addressed the Settlement directly requested a refund in some capacity. Approximately 45 people, or three-fourths of the commenters directly addressing the Settlement terms, addressed some form of reimbursement. However, the Settlement, as filed, **does** contain a reimbursement component. In response to the billing issues and this Settlement, PPL refunded, through a one-time line-item credit, approximately One Million Dollars to customers who received estimated bills and were overbilled. Moreover, these individual customers were not/are not precluded from contacting the Company to discuss refunds or from filing their own complaints with the Commission against PPL.

A few commenters suggested modifications to the Settlement as it stands, including a suggestion that PPL be audited. I&E has learned that the Commission's Bureau of Audits is currently in the report drafting phase of a PPL management audit.

While this PPL management audit did not include a billing component, it is I&E's understanding that the Bureau of Audits intends to conduct a follow-up audit to potentially address those issues.

A few commenters suggested that the agreed-to civil penalty of One Million Dollars is not adequate. I&E notes the Commission's Policy Statement which sets forth ten (10) factors ("*Rosi* factors") that the Commission may consider in evaluating whether a civil penalty for violating a Commission order, regulation, or statute is appropriate, as well as whether a proposed settlement for a violation is reasonable and in the public interest. 52 Pa. Code § 69.1201. These factors look at:

(1) Whether the conduct at issue was of a serious nature. When conduct of a serious nature is involved, such as willful fraud or misrepresentation, the conduct may warrant a higher penalty. When the conduct is less egregious, such as administrative filing or technical errors, it may warrant a lower penalty.

(2) Whether the resulting consequences of the conduct at issue were of a serious nature. When consequences of a serious nature are involved, such as personal injury or property damage, the consequences may warrant a higher penalty.

(3) Whether the conduct at issue was deemed intentional or negligent. This factor may only be considered in evaluating litigated cases. When conduct has been deemed intentional, the conduct may result in a higher penalty.

(4) Whether the regulated entity made efforts to modify internal practices and procedures to address the conduct at issue and prevent similar conduct in the future. These modifications may include activities such as training and improving company techniques and supervision. The amount of time it took the utility to correct the conduct once it was discovered and the involvement of top-level management in correcting the conduct may be considered.

(5) The number of customers affected and the duration of the violation.

(6) The compliance history of the regulated entity which committed the violation. An isolated incident from an otherwise compliant utility may result in a lower penalty, whereas frequent, recurrent violations by a utility may result in a higher penalty.

(7) Whether the regulated entity cooperated with the Commission's investigation. Facts establishing bad faith, active concealment of violations, or attempts to interfere with Commission investigations may result in a higher penalty.

(8) The amount of the civil penalty or fine necessary to deter future violations. The size of the utility may be considered to determine an appropriate penalty amount.

(9) Past Commission decisions in similar situations.

(10) Other relevant factors. 52 Pa. Code § 69.1201(c). The Commission will not apply the factors as strictly in settled cases as in litigated cases. 52 Pa. Code § 69.1201(b).

The intent of applying these *Rosi* factors is to guarantee that the civil penalty imposed will accomplish the goals of further **deterring** actions from this Company or similarly situated utilities in violating the Public Utility Code. The underlying purpose of applying the *Rosi* factors is not in dispute.

Finally, just over 12 percent of commenters expressly voiced support for the Settlement or expressed a hope for a favorable outcome regarding the Settlement.

B. The OCA and CAUSE-PA's Request for Modification to Change Where the Civil Penalty Should be Directed Ignores that the Agreed-Upon Civil Penalty Amount Comports with the Commission's Policy Statement at 52 Pa. Code § 69.1201 and Should Not Be Disturbed

In addition to comments filed by PPL customers, comments requesting modification of the Settlement were also filed by the Office of Consumer Advocate ("OCA") on February 28, 2024, the final day in which the Order sought comments. That

same day, comments requesting modification of the Settlement were also filed by the Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania ("CAUSE-PA").

First, as the OCA Comments note:

> The $1 million to the General Fund will not resolve the financial harm to customers, but allocation of a portion to the Hardship Fund will tie the penalty to the impact of PPL's actions. The OCA recommends that a portion of the civil penalty be directed to the Hardship Fund. Specifically, the OCA recommends that between $500,000 - $750,000 of the penalty be directed to the Hardship Fund and that like the civil penalty, PPL be prohibited from claiming any charitable deduction for this contribution. The OCA is not recommending an increase in the total amount paid by PPL, thus the remainder of the $1 million would be allocated as a civil penalty.

OCA Comments at 9-10.

OCA does not fundamentally disagree with the civil penalty amount brought forth. Instead, OCA argues that having the civil penalty go to the General Fund does not resolve the financial impact to customers. This OCA recommendation is fatally flawed, completely contradicting the express intent of imposing a civil penalty and ignoring several corrective and remedial actions PPL has voluntarily taken in response to the billing issues that have a direct financial impact on customers:

1) PPL voluntarily waived all late payment fees for January and February 2023;

2) PPL is owed but will not seek to collect approximately $1.7 million from customers who received estimated bills and were underbilled due to the application of the incorrect rates in the bills that trued up the estimated billing periods;

3) PPL refunded, through a one-time line-item credit, **approximately $1.0 million to customers who received estimated bills and were overbilled due to the application of the incorrect rates in the bills that trued up the estimated billing periods;**

4) PPL on its own initiative did not terminate electric service for any customers for nonpayment from January 2023 through June 2023.

The OCA's suggestion that the civil penalty be distributed to customers is misguided. A monetary civil penalty is intended to be a deterrent factor, as anticipated in *Rosi*. The remedial actions taken by PPL in response to the billing issues already address the alleviation of financial hardship of impacted PPL customers.

Second, the CAUSE-PA Comments note:

> We submit that the proposed Settlement should be modified to explicitly aid PPL's low income customers, who likely experienced disproportionately harmful consequences as a result of the billing errors alleged in the proposed Settlement. Specifically, we urge the Commission to modify the proposed Settlement so that 50% of the $1 million penalty provided for in the proposed Settlement – or $500,000 – is directed to PPL's Hardship Fund – Operation HELP.

CAUSE-PA Comments at 6.

I&E is surprised and disappointed that OCA and CAUSE-PA posit that a $250,000 to $500,000 civil penalty, as they suggest, for a company the size of PPL and for the resulting system-wide impact on customers compounded by the extended duration of the billing issue would adequately satisfy the deterrent standard under the *Rosi* factors.

Interestingly, OCA took a seemingly opposite approach in its comments in *Pennsylvania Public Utility Commission Bureau of Investigation and Enforcement* v. *Columbia Gas of PA, Inc.* at Docket No. M-2022-3012079, where OCA addressed the

civil penalty agreed upon in that Settlement by recommending that the Commission not approve the proposed Settlement before the Commission could reasonably determine whether the agreed-to $990,000 civil penalty was actually a sufficient deterrent to ensure against future violations.[3] In the *Columbia* matter, the near million dollar civil penalty was not deemed by OCA to be an adequate deterrent, whereas in the instant PPL matter, it believes a $250,000 civil penalty would suffice. The OCA's inconsistent application of the *Rosi* factors here should be ignored.

The purpose of the civil penalty is to *deter* future violations from the Company and from other utilities. 52 Pa. Code § 69.1201. As discussed, the *Rosi* factors help aid the Commission in deciding whether a civil penalty and proposed Settlement is in the public interest. While the Commission need not apply these factors when considering settlements as opposed to litigated cases, they allow a framework for determining a reasonable and appropriate civil penalty and if the Settlement Agreement is in the public interest.

By filing the Joint Petition for Approval of Settlement, I&E and PPL have declared that they have in good faith negotiated an amicable resolution that benefits the public, the Parties, and this Commission. The primary purpose of the One Million Dollar civil penalty is to serve as an important deterrent from future violations and to serve as a signaling mechanism to other utilities of the consequences of such violations, in line with 52 Pa. Code § 69.1201(c)(8). Allocating the requested amount to a hardship fund would

[3] OCA comments 4–5. *Pennsylvania Public Utility Commission Bureau of Investigation and Enforcement* v. *Columbia Gas of PA, Inc*. at docket No. M-2022-3012079.

severely limit the penalizing impact of the fine. Moreover, directing a portion of the fine to be paid to a general hardship fund does not directly resolve - and has no relevance to - the purported concern for customers actually financial impacted by the billing issue in question. Much more impactful would be for individual complaints to be filed by these impacted customers. Plus, the PPL hardship fund has certain qualifying requirements, thus limiting the customers that would be able to benefit from this allocation and those limited beneficiaries may have no connection to customers actually harmed by the billing issue. Such a fund has no relevance to the subset of customers who may claim to have been impacted by the company's billing issue.

C. The OCA's Claim that the Settlement Does Not Sufficiently Address the Issues Presented Fails to Properly Consider the Steps Taken By PPL as a Result of this Settlement

The OCA avers that the Settlement does not fully address how customers were impacted by PPL actions, specifically that PPL is required to provide safe, safe, adequate and efficient service under Section 1501 of the Public Utility Code; monthly bills pursuant to 56.11, and reasonably accurate estimated bills under 56.12(3). To the contrary, the Settlement makes clear that PPL has taken steps to address fixes to both their customer service deficiencies as well as their billing issues as detailed in the Settlement Agreement. This list includes the following:

1) Revising back-office processes to reduce the number of no-bill and multi-primary bills;

2) Evaluating the formula to calculate estimates to determine if improvements can be made to the estimation process;

3) Creating internal daily control reports on estimated bills, multi-primary bills, and daily meter read rates and operational metrics;

4) Developing work arounds to process meter data outside of MDMS when needed, and;

5) Enriching MDMS estimations for scenarios where meter data is missing to reduce the time period estimated, and;

6) Starting December 18, 2022, PPL customer service representatives were provided with talking points to answer customer questions about the estimated bills.

Furthermore, PPL has agreed not to recover any mitigation costs from Pennsylvania consumers by any future proceeding, device, or means whatsoever when it comes to the costs that were incurred while responding to billing issues. These steps aim to fix the issues and deficiencies that I&E's investigation discovered and are in the interest of the public.

OCA also states that requiring PPL to evaluate the formulas does not commit PPL to any changes. However, as detailed in Appendix C Section 2 of the Settlement, evaluating the formula to calculate estimates to determine if improvements can be made to the estimation process is already in progress and this goal is to minimize the use of estimated bills. Plus, when estimated bills need to be used, this will include prioritizing MDMS estimation over CSS estimation and will include a consideration of how estimated bills impact budget billing customers. It is evident from PPL's actions that it fully intends to implement any changes that will improve its estimate formulation.

Additionally, PPL has agreed to provide BCS with an explanation of how the new formula may impact budget billing customers, if a change is made. This is a reasonably

defined explanation and commitment to examining the formula estimation process and is well within the zone of reasonableness.

Lastly, the OCA also recommends that the Commission consider requiring the Bureau of Audits to investigate whether the fixes identified in the Settlement have been completed and whether additional fixes are necessary to ensure that the situation does not reoccur. As previously addressed, the Commission's Bureau of Audits is already considering such action.

Seeing as OCA and CAUSE-PA do not actually dispute the amount of the civil penalty (only the allocation thereof) and request steps already being taken by PPL and by the Commission to ensure that these remedial measures take effect, there is no reason to upset the Settlement as filed. Further, considering the vast array of customer comments submitted, some of which are not relevant to the consideration of the Settlement before the Commission, it appears that the majority of commenters addressing the substance of the settlement have only minor suggestions that have been previously addressed herein or are in favor of the Settlement as it stands. The Parties agree to the Settlement terms set forth and urge the Commission to approve the Settlement as submitted as being in the public interest.

III. Standard for Settlements

I&E reiterates herein as stated in I&E's Statement in Support accompanying the Joint Petition for Approval of Settlement that the proposed Settlement Agreement is in the public interest and is consistent with the Commission's Policy Statement at 52 Pa. Code § 69.1201, *Factors and standards for evaluating litigated and settled proceedings*

involving violations of the Public Utility Code and Commission regulations—statement of policy (Policy Statement). See also, *Joseph A. Rosi v. Bell-Atlantic-Pennsylvania, Inc*., Docket No. C-00992409 (Order entered March 16, 2000) (Referred to herein as "*Rosi* factors").

The focus of inquiry for determining whether a proposed settlement should be recommended for approval is not a "burden of proof" standard, as is utilized for contested matters. *Pa. PUC, et al. v. City of Lancaster - Bureau of Water*, Docket Nos. R-2010-2179103, *et al*. (Order entered July 14, 2011). Rather, the benchmark for determining the acceptability of the proposed Settlement is whether the proposed terms and conditions are in the public interest. *Id*. (citing *Warner v. GTE North, Inc*., Docket No. C-00902815 (Order entered April 1, 1996); *Pa. PUC v. C.S. Water and Sewer Associates,* 74 Pa. P.U.C. 767 (1991)). Pursuant to the Commission's Regulations at 52 Pa. Code § 5.231, **it is the Commission's policy to promote settlements**. It is understood that the Commission will undertake a review of the proposed settlement to determine whether the terms of said settlement are in the public interest. *Pa. PUC v. Philadelphia Gas Works*, Docket No. M-00031768 (Order entered January 7, 2004). As here, where a presiding officer has not been assigned to the proceeding, the terms of the proposed Settlement are to be reviewed by the Commission pursuant to 52 Pa. Code § 5.232(g). That review of the Settlement terms and conditions determines whether the Settlement, as filed, meets the benchmark standard of being in the public interest.

To make that determination, and to implement the Commission's policy to promote settlements, the Commission applies the *Rosi* factors. These ten (10) factors are

used to evaluate whether a civil penalty for violating a Commission Order, Regulation, or statute is appropriate, as well as to determine if a proposed settlement is reasonable and approval of a proposed settlement agreement is in the public interest. Once again, the factors to be considered pursuant to 52 Pa. Code § 69.1201(c), are:

(1) Whether the conduct at issue was of a serious nature. When conduct of a serious nature is involved, such as willful fraud or misrepresentation, the conduct may warrant a higher penalty. When the conduct is less egregious, such as administrative filing or technical errors, it may warrant a lower penalty.

(2) Whether the resulting consequences of the conduct at issue were of a serious nature. When consequences of a serious nature are involved, such as personal injury or property damage, the consequences may warrant a higher penalty.

(3) Whether the conduct at issue was deemed intentional or negligent. This factor may only be considered in evaluating litigated cases. When conduct has been deemed intentional, the conduct may result in a higher penalty.

(4) Whether the regulated entity made efforts to modify internal practices and procedures to address the conduct at issue and prevent similar conduct in the future. These modifications may include activities such as training and improving company techniques and supervision. The amount of time it took the utility to correct the conduct once it was discovered and the involvement of top-level management in correcting the conduct may be considered.

(5) The number of customers affected and the duration of the violation.

(6) The compliance history of the regulated entity which committed the violation. An isolated incident from an otherwise compliant utility may result in a lower penalty, whereas frequent, recurrent violations by a utility may result in a higher penalty.

(7) Whether the regulated entity cooperated with the Commission's investigation. Facts establishing bad faith, active concealment of violations, or attempts to interfere with Commission investigations may result in a higher penalty.

(8) The amount of the civil penalty or fine necessary to deter future violations. The size of the utility may be considered to determine an appropriate penalty amount.

(9) Past Commission decisions in similar situations.

(10) Other relevant factors. 52 Pa. Code § 69.1201(c). The Commission will not apply the factors as strictly in settled cases as in litigated cases. 52 Pa. Code § 69.1201(b).

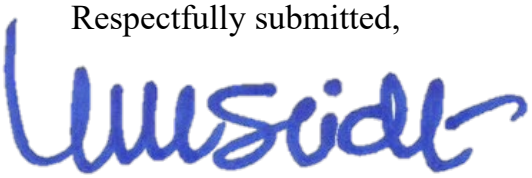
Pursuant to Section 1201(b), while many of the same factors may still be considered, in settled cases, the parties "**will be afforded flexibility in reaching amicable resolutions** to complaints and other matters as long as the settlement is in the public interest." *Id*. (Emphasis added.)

Under the terms of the instant Settlement, PPL agreed to revise processes and creation of reports to prevent future "no-bills," update Company practice to prevent inaccurate billing, review and update the formula to calculate estimated billing, create internal daily reports, develop an alternate process for the bypass of actual meter data in order to more quickly respond outside of MDMS and to enhance customer service. Moreover, this Settlement imposes a punitive civil penalty of One Million Dollars which is in the range of some of the largest deterrent fines ever achieved by I&E.

Clearly, the Settlement reached between I&E and PPL is in the public interest.

WHEREFORE, I&E supports the Settlement Agreement as being in the public interest and respectfully requests that the Commission approve the terms as set forth in the Joint Petition in their entirety without modification.

Respectfully submitted,



Michael L. Swindler
Deputy Chief Prosecutor
PA Attorney ID No. 43319

Pennsylvania Public Utility Commission
Bureau of Investigation and Enforcement
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17120
(717) 783-6369
mswindler@pa.gov

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Pennsylvania Public Utility Commission, Bureau of Investigation and Enforcement's Investigation of PPL Electric Utilities Corporation for potential violations of 52 Pa. Code § 56.1, *et seq.,* of the Commission's regulations and 66 Pa.C.S. § 1501 of the Public Utility Code	:	Docket No. M-2023-3038060

CERTIFICATE OF SERVICE

I hereby certify that I have this day, March 19, 2024, served a true copy of the foregoing **Reply Comments**, upon the parties listed below, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a party).

Service by Electronic Mail:

Devin T. Ryan, Esq.
Post and Schell, P.C.
17 N 2nd Street, 12th Floor
Harrisburg, PA 17101-1601
dryan@postschell.com

Tina Holmes
2419 New York Ave
Camp Hill, PA 17011
tinaholmes120317@gmail.com

Brock Lehman
Kevin E Raker Construction LLC
188 Horseshoe Bend Drive
Sunbury, PA 17801
brocklehman22@gmail.com

Kelli Harlan
RLPS Architects
1283 Wheatland Avenue
Lancaster, PA 17603
kharlan@rlps.com

Christina Hausner
3299 Randy Rd
Lancaster, PA 17601
chausner3299@gmail.com

Bryanna Krammes
3390 Scott Ln
Center Valley, PA 18034
bryanna.krammes@gmail.com

Robert Balicki
638 Garfield Street
Hazleton, PA 18201
trygclutch@gmail.com

Andrew Borek
1612 Newton Ransom Blvd
Clarks Summit, PA 18411
barbara98@aol.com

Dustin Dillman
419 N Nice St
Frackville, PA 17931
drd1981@gmail.com

Jeffrey Allen Dincher
West End Rentals LLC
159 Mount Equity Road
Muncy, PA 17756
dinjef59@gmail.com

Kenneth Dale Sellers
K. Dale Sellers General/Excavation Contractor
447 Fox Hollow Road
Turbotville, PA 17772
selcon@verizon.net

Joseph Stauffer
4109 Ford Drive
Emmaus, PA 18049
jstauf@outlook.com

Sharon Szabo
1688 Edward Dr.
Hellertown, PA18055
lawyermom1@aol.com

Erika Hawk
416 Northampton Rd
Tobyhanna, PA 18466
erika.klammer08@gmail.com

Frances V Jurewicz
506 Cedar Head Road
Florence, PA 29501-7139
mkline803@gmail.com

Jolen G. Roseberry
129 Jonas Creek Road
Kunkletown, PA 18058-7893
jolen@ptd.net

Jared Paulhamus
976 Grove Road
Cogan Station, PA 17728
metred81@hotmail.com

Kimberly Martin
520 Pleasant Valley Rd
Denver, PA 17517
Ka_martin@live.com

Leslie M Corby
Little Desk Preschool
112 Greenbriar Drive
Springbrook Twp, PA 18444
corby112@comcast.net

Leslie Corby
R and L Greenwood
3335 Greenwood Avenue
Moosic, PA18507
corby112@comcast.net

Wendy Herner
208 Frances Avenue
Lancaster, PA 17602
Wenjess1965@outlook.com

Geoffrey M. Rozecki
2814 North Ford Dr
Hatfield, PA 19440
grozecki1@gmail.com

Roseanne Daecher
150 Beddington Lane
Strasburg, PA 17579
thescream50@gmail.com

Donna Ransom
83 Andrew Drive
Ashley, PA 18706
tessjill@ptd.net

Carl Rogers
1420 W Trindle Rd
Carlisle, PA 17015
cmrogers59@yahoo.com

Jillian Major
124 Birch Street
Drums, PA 18222
jillianmajor@hotmail.com

Michell Suayan
312 Kennel Rd
Saylorsburg, PA 18353
msuayan55@yahoo.com

Laurie A Bedford
1236 Schuylkill Mt. Road
Schuylkill Haven, PA 17972
laurann76@verizon.net

Michael Sowinski
149 Middle Road
Drums, PA 18222
michael.p.sowinski@outlook.com

Karen R. Turner
4611 Abbington Drive
Harrisburg, PA 17109
Kaytee826@gmail.com

Chad M Bogansky
2 Schwabe Street
Freeland, PA 18224
cbogansky3@yahoo.com

Ed Frey
424 Spring Hollow Drive
New Holland, PA 17557
efrey1022@gmail.com

Louis Muñoz
8110 Chambers Hill Road
Harrisburg, PA 17111
Rnlf.00@gmail.com

Karen Travis
Chambers Hill Road
Harrisburg, PA 17111
destinysmilekt@gmail.com

Pamela Everdale
124 Rocks Lane
Freeland, PA 18224
Pamela.Everdale@gmail.com

Lexi Evangelisti
P.O. Box 60
Picture Rocks, PA 17762
Lexii8477@gmail.com

Stacey Pepitone
PASD Cheer PRents Club
75 Buttercup Way
Kunkletown, PA 18058
staci314@gmail.com

Deborah Walters
143 Crest Road
Hazleton Township, PA 18202
ddwalters57@gmail.com

Joseph L Adams
300 Woodcrest Drive
Lancaster, PA 17602
gladams27@gmail.com

Karen Sodl
1233 Lehigh st
Allentown, PA 18102
klsodl77@gmail.com

John Sweet, Esq.
Elizabeth R Marx, Esq.
Ria Pereira, Esq.
Lauren Berman, Esq.
PA Utility Law Project
118 Locust Street
Harrisburg, PA 17101
jsweet@pautilitylawproject.org
emarx@pautilitylawproject.org
rpereira@pautilitylawproject.org
lberman@pautilitylawproject.org

Christy Appleby, Esq.
Office of Consumer Advocate
555 Walnut Street, 5th Floor
Forum Place
Harrisburg, PA 17101
cappleby@paoca.org

Carolyn Lenze
8203 Brown St.
Slatington, PA 18080
carolynlenze@yahoo.com

NazAarah Sabree, Esq.
Office of Small Business Advocate
555 Walnut Street
1st Floor, Forum Place
Harrisburg, PA 17101-1923
ra-sba@pa.gov

Claudia Lamp
429 Walnut Road
Honey Brook, PA 19344
cjl8@verizon.net

William and Joan Hopersberger
224 Bear Run Drive
Drums, PA 18222
bjhjmh0827@gmail.com

Tammy L. Hamilton
155 Beetem Hollow Rd
Newville, PA 17241
domino9@embarqmail.com

Lisa Myers
8 Fox Creek Rd
Wrightsville, PA 17368
Lisarmyers@comcast.net

Kurt Charles Mayer
814 Tenth Street
Selinsgrove, PA 17870
kurtmichele13@aol.com

Donna Strohm
102 Columbia Ave
Mount Joy, PA 17552
dlstrohm2@gmail.com

Edwin Miller
215 W Center Street
Mahanoy City, PA 17948
esmtpa@yahoo.com

Jeffrey T Gilfillan
14 1st Street
Schuylkill Haven, PA 17972
jgilfillan@pa.gov

Jerry Hauck
141 Hauck Road
New Columbia, PA 17856
jernlisa@windstream.net

Randy Fischer
338 Knights Bridge Way
Lititz, PA 17543
place4coupons@gmail.com

Dale L Sensenig
940 Skyline Ave.
Lititz, PA 17543
ds.sensenig@yahoo.com

Robert Cichonski
129 Robert Drive
Allentown, PA 18104
robert.cichonski@outlook.com

Christine Chesniak
66 Bryden Lane
Pittston, PA 18640
Chesniakchristine@yahoo.com

Richard C. Culbertson
1430 Bower Hill Road
Pittsburgh, PA 15243
Richard.c.culbertson@gmail.com

Joanne Schwalm
35 Deer View Road
Hegins, PA 17938
schwammie@comcast.net

Patricia Vitkitis
499 Wood St
Richmondale, PA 18421
Colinv13@icloud.com

Ann Kirchoff
1069 Chapel Forge Dr
Lancaster, PA 17601
Annkirchoff@comcast.net

Arlene Sales
3100 Briarwood Drive
Tobyhanna, PA 18466
as_830@yahoo.com

Andrew Kohut, Jr.
102 N. Waverly Street
Shillington, PA 19607
kohut1955@gmail.com

Anthony Leza Newborn
1252 Beech Place
East Stroudsburg, PA 18301
newbornlanding@outlook.com

John Quinn
216 Maple Avenue
Quarryville, PA 17566
jaquinn@aol.com

Tonya Hein
1733 Newport Ave
Northampton, PA 18067
tonyamd1974@yahoo.com

Mary Lou Shaw
1054 Elysburg Road
Danville, PA 17821-7828
marlusha57@gmail.com

Edwin Miller
215 W Center Street
Mahanoy City, PA 17948
esmtpa@yahoo.com

Marie E. Lipsett
29 Maple Avenue
P.O. Box 96
Mar Lin, PA 17951
m_lipsett@yahoo.com

Maureen Capone
373 Back Road
Barnesville, PA 18214
maureen-capone@hotmail.com

Served via First Class Mail

Anthony Thomas
1736D Beaver Valley Pike
Strasburg, PA 17579

Patricia Maradeo
1520 Terrace Blvd
Hazleton, PA 18201

Brian Dunleavy
575 Main Street E.
Eynon, PA 18403-1122

Patrice Mussoline
222 S. Wyoming Street
Hazleton, PA 18201-7276

Doug Wanamaker
7141 Route 873, Unit 4
Slatington, PA 18080

Dorothy Bulchie
525 West Centre Street
Shenandoah, PA 17976

Linda Pellish
330 Patton Drive
Orwigsburg, PA 17961

Daniel Geeza
117 High Street
Jessup, PA 18434

Sara Balcerek
142 Carlyle Circle
Columbia, SC 29205

Kimberly Landon
2077 Clover Mill Road
Quakertown, PA 18951

Philip Underkoffler
5364 State Route 209
Lykens, PA 17048-9603

Douglas Kelly
169 Lepore Drive
Lancaster, PA 17602

John Marzinsky
1009 Maple Street
Pottsville, PA 17901

Geri Sarno
1276 Pole Road
P. O. Box 270
Ringtown, PA 17967

Orsana Casello
24 Garber Street
Old Forge, PA 18518

Bernice Platek
1330 East Chestnut Street
Hazleton, PA 18201

Michael Fisher
1832 Aaron Drive
Lock Haven, PA 17745

Susan Treshock
P. O. Box 67
Lost Creek, PA 17946

Jane Auricchio
315 The Hide Out
Lake Ariel, PA 18436

Robert Witkowski
1838 Crazyhorse Drive
Auburn, PA 17922

Deborah Brown
20 Silvercreek Road
New Philadelphia, PA 17959

Carl Charles
5926 Holiday Drive
Allentown, PA 18104

William and Sarah Yenkevitch
769 West Butler Drive
Sugarloaf, PA 18249

Michael Kopacz
127 Pettebone St
Duryea, PA 18642

Shirley Dewalt
1796 Coudersport Pike
Lock Haven, PA 17745

James Del Conte
723 S Route 183
Schuylkill Haven, PA 17972

Kathleen Middendorf
455 Swopes Valley Road
Pine Grove, PA 17963

Rose Kereczman
1942 Chester Road
Bethlehem, PA 18017-2758

Patricia Bowman
528 East Ross Street
Lancaster, PA 17602

Claire Jaekel
3 Game Club Road, Apt 3
Pottsville, PA 17901

James Rother
670 Mountain Oaks Drive
Laurel Run, PA 18706

Kimberly Woods
T J McGeehan Sales and Service Ltd
5215 North Lehigh Gorge Road
White Haven, PA 18661

Lucy Tristani
405 Butler Avenue
Lancaster, PA 17601

B Harold Thomas Jr.
16 Dennis Dr
Willow Street, PA 17584

Neal Crouse
565 Indiandtown Road
Ephrata, PA 17522

Thomas Murphy
9 Ross Drive
Orwigsburg, PA 17961-1427

Mary Jellock
1026 Mount Cobb Rd
Lake Ariel, PA 18436-3318

Tom Macdonald
905 Moosic Road
Old Forge, PA 18518-2034

Michael Schlegel
1713 Gordon Lane
Tobyhanna, PA 18466

Suzanne Hodge
6015 Jacobs Ave
Harrisburg, PA 17112-1206

Colette Corby
108 Pennsylvania Ave
Frackville, PA 17931

Catherine Postupack
160 Ben Titus Road
Still Creek, PA 18252-4821

Richard Goho
67 Fawn Lane
Tamaqua, PA 18252

Joseph Latosky
94 Oak Street
Freeland, PA 18224

William Smith
935 Roche Ct
Scranton, PA 18509

Dawn Shepard
423 N 7th Street
Denver, PA 17517

Nancy Matys
807 Glen St
Duryea, PA 18642

Jeanine Staller
65 Miller Gap Road
Enola, PA 17025-1008

Patricia & Raymond Sabo
719 E Federal Street
Allentown, PA 18103

Paul Nardozzi
203 S. Apple Street
Dunmore, PA 18512

Mary Ellen Graybill
400 S. Rockford Road, Apt 106
Mountville, PA 17554-1071

Barbara Lynn Kenvin
P.O. Box 435
Conygham, PA 18219

Patricia Devine
1126 Pottsville Street
Pottsville, PA 17901

Thomas Jubinski
504 Miles Avenue
Olyphant, PA 18447

Harvey Oberholtzer
390 N. Maple Avenue
Leola, PA 17540-9797

Dolores Yanolko
2333 South 3rd Street
Allentown, PA 18103

Maria Jones
3163 Thistle Drive
Lancaster, PA 17601

Judy Quinlan
11 Oak Lane
Jefferson Township, PA 18436

Rosemary Hockenbury
151 Lakeview Trail
Sugarloaf, PA 18249

Michael L. Swindler
Deputy Chief Prosecutor
Bureau of Investigation and Enforcement
PA Attorney ID No. 43319
(717) 783-6369
mswindler@pa.gov