

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of Columbia Gas of)
Pennsylvania, Inc. to Modify Its) Docket No. P-2010-2195759
Universal Services and Energy)
Conservation Plan)

**PETITION OF COLUMBIA GAS OF PENNSYLVANIA, INC.
TO MODIFY ITS UNIVERSAL SERVICES AND
ENERGY CONSERVATION PLAN**

Columbia Gas of Pennsylvania, Inc. ("Columbia") submits this Petition seeking to modify its Universal Services and Energy Conservation Plan ("USECP") for the 2010-2011 heating season in order to adopt a Customer Assistance Program ("CAP") plus program with respect to the CAP "asked to pay" amount. The requested modification is proposed in response to a recent directive from the Pennsylvania Department of Public Welfare ("DPW") changing the application of Low Income Heating Energy Assistance Program ("LIHEAP") grants to a customer's bill. The proposed "plus" modification will increase the "asked to pay" amount of all CAP customers by a modest amount, in an effort to address the effect of DPW's change so as not to overburden non-CAP residential customers, who otherwise would bear the cost of DPW's change.

Introduction

1. Columbia is a corporation organized and existing under the laws of the Commonwealth of Pennsylvania. Columbia is currently engaged in the business of selling and distributing natural gas to retail customers within the Commonwealth, and is therefore a "public utility" within the meaning of Section 102 of the Public Utility Code (66 Pa.C.S. § 102); subject to the regulatory jurisdiction of the Commission. Columbia

provides retail natural gas service to approximately 413,000 customers in 26 counties of Pennsylvania, pursuant to certificates of public convenience granted by the Commission.

2. The Natural Gas Choice and Competition Act (“Act”), 66 Pa.C.S. §§ 2201-2212, established standards and procedures for the restructuring of the natural gas utility industry. The Act includes several universal services provisions to ensure that natural gas service remains available to all customers in the Commonwealth.

3. To help meet its universal services obligations under the Act, the Commission established *Universal Service and Energy Conservation Reporting Requirements* (“Reporting Requirements”). 52 Pa. Code §§ 62.1-62.8. These Reporting Requirements require Natural Gas Distribution Companies (“NGDCs”), such as Columbia, serving more than 100,000 residential accounts to submit to the Commission for approval an updated Universal Service and Energy Conservation Plan (“USECP”) every three years, on a staggered schedule. 52 Pa. Code § 62.4(a)(1).

4. In the Final Rulemaking Order approving the reporting requirements, the Commission established a procedure for the submission of USECPs and Impact Evaluations. *Reporting Requirements for Universal Service and Energy Conservation Programs 52 Pa. Code Chapter 62*, Docket No. L-00000146 (Final Rulemaking Order entered June 26, 2000).

5. On October 28, 2008, the Commission entered an Order in Docket No. R-2008-2011621 approving Columbia’s current USECP.

6. Columbia is required to file its next USECP by June 1, 2011, and USECP Impact Evaluation by August 1, 2010. On May 26, 2010 Columbia filed a Petition for an

extension to file its USECP Impact Evaluation, which the Commission approved in a public meeting held on July 29, 2010.¹

7. Columbia's CAP is a low-income payment assistance program available to residential customers with gross household income at or below 150% of the federal poverty level. CAP customers are expected to pay a discounted portion of their monthly bill in exchange for the benefits provided by the CAP. The details of Columbia's CAP were included in its most recent USECP that was approved by the Commission.

8. CAP customers' bills are made up of two portions—(1) the fixed monthly amount that they are asked to pay ("asked to pay" amount); and (2) the CAP credit (the difference between the asked to pay amount and the full bill amount), which is funded through Columbia's universal services program ("USP") rider that is charged to all non-CAP residential customers. A full description of Columbia's CAP is provided in the attached Appendix A, *The Testimony of Deborah A. Davis*.

Background

9. In the summer of 2009, DPW proposed changes in the way federal LIHEAP grants are applied to the accounts of CAP customers.² Specifically, DPW directed public utilities that operate CAP programs to apply the LIHEAP cash grant to the customer's monthly asked to pay amount, rather than the CAP credit.

¹ *Petition of Columbia Gas of Pennsylvania, Inc. for Extension of Time to File its Universal Service and Energy Conservation Impact Evaluation Pursuant to 52 Pa. Code § 62.4, R-2008-2011621* (May 26, 2010). Columbia filed a request for extension of time to file its impact evaluation as a result of the preferred BCS-approved third party evaluator having a conflict resulting from conducting a similar evaluation for another Pennsylvania utility at the same time. Columbia also stated in its petition that an extension in filing its USECP Impact Evaluation would not affect Columbia filing its USECP by June 1, 2011. The Office of the Consumer Advocate filed a letter not opposing Columbia's request on June 15, 2010, and the Commission entered an order approving Columbia's request on August 3, 2010. The period for exceptions expired on August 4, 2010 without any parties filing exceptions.

² *LIHEAP 2010 Final State Plan*, p. viii, available at: <http://www.dpw.state.pa.us/ServicesPrograms/LIHEAP/003676506.htm>

10. Because this proposed change is inconsistent with the Commission's Policy Statement addressing the CAP design elements found at 52 Pa. Code § 69.265, the Commission temporarily suspended its regulation which requires that "the LIHEAP grant should be applied to reduce the amount of CAP credits" (52 Pa. Code § 69.265(9)(iii)). *Customer Assistance Program Policy Statement Suspension and Revision*, Docket No. M-00920345 (Order entered April 9, 2010).

11. Pursuant to the blanket suspension of 52 Pa. Code §§ 69.265(9)(ii)-(iii) as ordered by the Commission in Docket No. M-00920345, Columbia will apply LIHEAP grants to the asked to pay amount rather than the CAP credit for the 2010-2011 heating season, unless DPW rescinds its proposed policy changes. *See Appendix A, The Testimony of Deborah A. Davis*, at 4.

12. On June 25, 2010, Columbia filed a Joint Petition for Settlement in its 2010 base rate proceeding ("2010 Rate Case Settlement"), filed at Docket No. R-2009-2149262.

13. As relevant to this Petition for Waiver, the 2010 Rate Case Settlement contained the following provision:

[21(f)(iii)] Columbia will adopt a CAP-plus program consistent with the CAP-plus program recommended by OCA witness Colton's direct testimony (OCA Statement No. 4). The Company will work with the interested parties to develop and design interim changes to the CAP payments in time to request any required waiver of its approved universal service plan from the Commission prior to the start of the 2010-2011 LIHEAP season. If a consensus cannot be developed, Columbia will file its proposal with the Commission by October 1, 2010.³

³ 2010 Rate Case, Docket No. 2010-2149262 (Joint Petition for Settlement filed June 25, 2010).

OCA witness Colton's testimony proposed that "in addition to charging its traditional percentage of income payment, Columbia would add a charge to the bills of all CAP participants to generate a revenue stream equal to the total value of LIHEAP grants applied against the asked-to-pay amounts (rather than against the CAP shortfall)."

Pennsylvania Public Utility Commission v. Columbia Gas of Pennsylvania, Inc., Docket No. R-2009-2149262 (OCA Statement No. 4, p.24). As stated by Mr. Colton, this will avoid setting a bill at an affordable level using ratepayer subsidies, and then providing an additional subsidy to lower that affordable bill even further at other non-CAP ratepayers' expense, which would otherwise be the impact of DPW's change to the Columbia CAP. OCA Statement No. 4, pg. 24.

14. The Commission entered a final order approving the Joint Petition for Settlement in Columbia's 2010 base rate case proceeding on August 18, 2010.

Request for Waiver of Columbia's Universal Services and Energy Conservation Program in Order to Implement a CAP Plus Approach for the 2010-2011 Heating Season

15. In accordance with the afore-mentioned provisions, Columbia met with interested parties to develop a "CAP-plus" proposal for Commission approval. Following recent consultation with the Office of Trial Staff and the Office of Consumer Advocate, the parties who addressed these issues in the base rate case, we are authorized to represent that both offices are in concurrence with Columbia's proposal.

16. DPW's directive increases the assistance available to CAP customers who receive LIHEAP grants by crediting the grant to the customer's asked to pay amount. As

a result, the DPW directive increases the cost recovered through the USP surcharge, by removing LIHEAP grants as an offset to the CAP credit.

17. Moreover, as CAP participation increases, the potential for CAP subsidization contributed by the non-CAP customers grows.

18. The DPW directive results in CAP customers who receive LIHEAP grants having a net household energy burden that is lower than the percentages of income burdens that Columbia's USECP targeted, and which are suggested by the Commission in its Policy Statement.

19. In accordance with the 2010 Rate Case Settlement terms, Columbia proposes to adopt the CAP plus approach consistent with OCA witness Colton in Docket No. R-2009-2149262 (Columbia's 2010 base rate proceeding) as a solution to offset the increased CAP credit burden that would be imposed on non-CAP customers as a result of the DPW's method change for applying LIHEAP dollars.

20. Columbia proposes to charge all CAP participants the "plus" amount. Attached as Appendix B is a proposed tariff change to reflect this proposed amendment to the CAP provisions of its tariff.

21. The "plus" amount shall be equivalent to the average LIHEAP credit received by all CAP participants. Columbia will calculate its "plus" amount as follows: (total LIHEAP receivables from the prior heating season / the number of active CAP participants at the start of the current LIHEAP program season) / 12. This calculation will effectively produce the average LIHEAP payment across all CAP participants. *See Appendix A, The Testimony of Deborah A. Davis, p. 5.* As explained in Appendix "A," Columbia currently estimates that the "plus" payment amount for all CAP customers will

be approximately \$13.34 per month. However, the average LIHEAP grant this past heating season was \$373, or approximately \$31 per month. Thus, CAP participants actually receiving grants generally will have a lower net out of pocket cost even after the "plus" payment.

22. The proposed changes in the application of LIHEAP dollars to CAP payments, and cost recovery, are contingent upon the DPW's directive being implemented by DPW. If the DPW rescinds its policy change, Columbia will reinstate the process of using LIHEAP grants to reduce CAP credits, and discontinue the CAP plus program.⁴

23. Columbia believes that the proposed CAP plus calculation is just and reasonable. Columbia believes the CAP plus approach will create a positive incentive for CAP customers to apply for LIHEAP grants in addition to more fairly balancing the financial effect of the DPW directive on non-CAP residential customers.

Conclusion

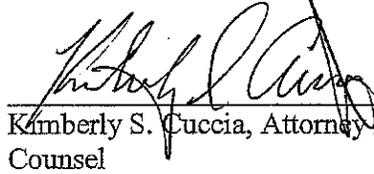
WHEREFORE, Columbia Gas of Pennsylvania, Inc. respectfully requests that the Pennsylvania Public Utility Commission (1) approve this Petition and enter an order allowing Columbia to modify its Universal Services and Energy Conservation Plan for the 2010-2011 heating season in order to adopt a Customer Assistance Program plus program with respect to the CAP asked to pay amount; and (2) direct Columbia to file modifications to its tariff setting forth its CAP plus program as set forth in Appendix B

⁴ The United States Department of Health and Human Services ("HHS"), as administrators of LIHEAP, issued a letter indicating that "use of the LIHEAP benefit to be applied to the 'discounted' part of the bill may be acceptable" and that "LIHEAP benefits applied to arrearages may only be permissible if the State agrees with this use of funds, and it is identified in the State plan as a benefit to LIHEAP clients." Letter from Yolanda J. Butler, Acting Director, Office of Community Services, United States Department of Health and Human Services to Ms. Linda Blanchette, Deputy Secretary of Income Maintenance, Pennsylvania State Department of Public Welfare (Apr. 1, 2009).

attached hereto, as a compliance tariff within fifteen (15) days of the entry of the
Commission's order.

Respectfully submitted,

COLUMBIA GAS OF PENNSYLVANIA, INC.



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Its Attorneys

Date: August 25, 2010

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

TESTIMONY OF

DEBORAH A. DAVIS

ON BEHALF OF
COLUMBIA GAS OF PENNSYLVANIA, INC.

PETITION OF COLUMBIA GAS OF PENNSYLVANIA, INC.
TO MODIFY ITS UNIVERSAL SERVICES AND ENERGY
CONSERVATION PLAN

DOCKET NO. _____

August 25, 2010

1 Q. Please state your name and business address.

2

3 A. Deborah A. Davis. 121 Champion Way, Canonsburg, PA 15317.

4

5 Q. By whom are you employed and in what capacity?

6

7 A. I am employed by Columbia Gas of Pennsylvania, Inc. ("Columbia" or "the
8 Company") as Manager, Universal Services.

9

10 Q. What are your responsibilities as Manager, Universal Services?

11

12 A. My responsibilities are to oversee the compliance and implementation of all
13 programs for low income and special needs customers including the Low Income
14 Home Energy Assistance Program ("LIHEAP") and the Customer Assistance
15 Program ("CAP").

16

17 Q. What is your Educational & Professional Background?

18

19 A. I hold a Bachelor of Arts degree in Social Work from the University of Pittsburgh.
20 In 1992, after two years working with the deinstitutionalized and low income sector
21 in Pittsburgh, I began my career with Columbia as a Customer Relations
22 Representative. In this capacity, I worked one on one with low income and special
23 needs customers. In 1996, I was promoted to Customer Assistance Manager
24 where my responsibilities included the day to day administration of CAP, Customer
25 Assessment, Referral and Evaluation Services ("CARES"), and Fuel Funds. Over
26 the years my title has changed, and responsibilities increased, specifically adding
27 compliance and implementation of all low income programs including
28 weatherization and LIHEAP to my job scope.

29

30 Q. Please describe the purpose of your testimony.

31

32 A. I am providing this testimony in support of Columbia's request for a waiver of a
33 provision contained within its approved Universal Service and Energy

1 Conservation Plan ("USECP") for the purpose of complying with a policy change
2 implemented by the Department of Public Welfare ("DPW").
3

4 Q. Please explain the reason that Columbia is requesting a waiver to this provision in
5 its existing USECP this year instead of waiting until next year's scheduled USECP
6 filing that must be filed by June 1, 2011.
7

8 A. Columbia is required to change the manner in which it applies LIHEAP funds to
9 customer accounts under Columbia's CAP as a result of a change in the DPW
10 policy. This policy will affect both customers on Columbia's CAP as well as
11 Columbia's non-CAP residential customers who pay the costs associated with
12 Columbia's CAP through the Universal Service Plan Rider ("Rider USP") in
13 Columbia's tariff. As a part of the recently filed Joint Petition for Settlement in its
14 2010 Rate Case in Docket No. R-2009-2149262, Columbia agreed to request that
15 the CAP payment changes be implemented with the 2010-2011 heating season
16 rather than wait to make the change in Columbia's next USECP filing in 2011.
17

18 Q. Please describe Columbia's CAP program.
19

20 A. Columbia's existing CAP program was designed to provide eligible low-income
21 customers with a more affordable bill. Under Columbia's CAP, the CAP customer
22 receives a discounted bill. If the CAP customer pays the discounted bill amount for
23 three years, the Company forgives the arrearages that developed on that CAP
24 customer's account before he entered into the program. Non-CAP customers
25 subsidize the difference between the full bill and discounted bill, also known as the
26 "CAP shortfall," and the pre-program arrearages through Rider USP. Currently,
27 when a CAP customer receives LIHEAP funds, Columbia credits those to the CAP
28 shortfall portion of the bill. This application both benefits that particular CAP
29 customer, because that customer is paying a lower bill, and also helps to control
30 the costs for all of the non-CAP customers by subsidizing the CAP shortfall dollars
31 with LIHEAP funds rather than collecting the entire shortfall from non-CAP
32 customers through Rider USP.
33

1 Q. Please briefly describe the existing payment structure for the Columbia CAP
2 program.

3 A. The CAP administrator selects the most affordable option not to be less than the
4 average of bill payments from that customer received over the previous 12 months.
5 Among Pennsylvania gas utilities, Columbia currently offers the lowest average
6 CAP payment.

7
8 Option #1: Percentage of Income.
9 0 – 110% of Poverty = 7%
10 110 – 150% of Poverty = 9%

11

12 Option #2: Average of last 12 months of customer payments.

13

14 Option #3: Flat rate of 50% of budget billing
15 (adjusted annually)

16

17 Senior CAP: Flat rate of 75% of budget billing for customers over 60 years of age
18 with no arrears or payment plan default

19

20 CAP customers are required to have a monthly minimum payment amount of
21 twenty-five dollars in addition to a monthly five-dollar co-payment towards pre-
22 program arrears is added to the CAP participant's bill.

23

24 Q. Why does Columbia want to change the existing payment structure?

25

26 A. Columbia has been applying LIHEAP funds in this manner for 18 years. Columbia
27 does not support the change in application of LIHEAP dollars to CAP bills directed
28 by the DPW's policy statement, but recognizes that it must comply with the DPW's
29 directive in order to maintain vendor status.

30

31 Q. What do you mean by the term "vendor status," and why is it important for
32 Columbia to maintain that status?

33

1 A. LIHEAP vendors are defined as any business that provides home heating fuel or
2 supplies energy. This could be fuel oil, kerosene, propane, bottled gas, wood,
3 electric or natural gas. Any vendor wishing to participate in the LIHEAP program is
4 required to complete and sign the LIHEAP vendor agreement and return it to the
5 Department of Public Welfare. Only LIHEAP vendors may receive funds directly
6 from LIHEAP. If Columbia loses its LIHEAP vendor status, the LIHEAP funds will
7 go directly to the customer and there is no guarantee that the funds will be applied
8 to the utility service. This would increase the cost of the program and lessen the
9 likelihood that utility service would remain on.

10

11 Q. What change will Columbia make to its payment structure?

12

13 A. Consistent with the DPW policy change, Columbia will apply the LIHEAP funds
14 directly to the "asked to pay amount" (the amount that the CAP customer is
15 required to pay under the CAP, as currently designed and approved), rather than
16 applying it to the amount the customer would have been required to pay if they
17 were not under the CAP program. Columbia will also raise the amounts that all
18 CAP customers are required to pay in order to help control the costs of the
19 program subsidized by the non-CAP customers.

20

21 Q. How is Columbia proposing to raise CAP payments?

22

23 A. Columbia is proposing to use the following formula to be computed annually prior
24 to the start of the heating season. This "plus" amount will be added to the existing
25 payment structure I previously explained. For illustrative purposes, I have used
26 last year's figures to show the impact of this proposed change to the CAP. Last
27 year's figures appear in parentheses.

28

29 Take the total LIHEAP funds received for CAP accounts from the prior
30 heating season (\$3,831,510.34),

31

32 And divide it by the total number of active CAP accounts at the start of
33 the current heating season (23,936 as of the end of June),

1 Divide that by 12 for the monthly increase to CAP payments.

2

3 $\$3,831,510.34 / 23,936 = 160.07/12 = \13.34

4

5 Q. How will this increase impact existing CAP customers?

6

7 A. Today, Columbia's average payment is \$47 plus \$5 towards the customer's pre-
8 CAP program arrearages. The effect of the DPW change will increase the average
9 CAP asked to pay amount to \$60 plus \$5 towards the customer's pre-CAP
10 program arrearages. The \$60 is calculated by taking the current average CAP
11 asked to pay amount of \$47 and adding the \$13 "plus" amount—calculated above.
12 Last heating season (September 2009 through August 2010), the average LIHEAP
13 grant was \$373. Under the CAP plus approach proposed by Columbia in this
14 Petition, using that \$373 LIHEAP grant amount illustratively, the LIHEAP grant will
15 effectively reduce CAP participants' monthly payment to \$30 plus the \$5
16 preprogram arrearage amount ($\$373 / 12 = \31). These numbers are based on
17 current numbers that will be recalculated prior to October 1, 2010 with updated
18 data.

19

20 Q. What is the reasoning behind this proposed CAP "plus" calculation?

21

22 A. The proposed calculation will essentially neutralize the effect of the DPW policy
23 change on the amount subsidized by non-CAP customers by an amount equal to
24 the prior heating season's LIHEAP funds received. Although all CAP customers do
25 not receive energy assistance, all CAP customer payments must be raised in order
26 to comply with the LIHEAP vendor agreement, which is why Columbia proposes
27 this CAP "plus" method. Columbia wants to maintain vendor status so that it's
28 customers can use LIHEAP grants towards their natural gas bills.

29

30 Q. Please explain why all CAP participants' payments will be raised if not all CAP
31 participants receive LIHEAP grants.

32

1 A. All CAP participants are eligible for LIHEAP and strongly encouraged and
2 reminded by the company to apply. However, some CAP participants apply the
3 grant to their electric bills and others do not apply for the grant at all. Historically,
4 on average half of Columbia's CAP customers request that their LIHEAP grant be
5 applied to their CAP account. DPW has been clear that a LIHEAP recipient
6 cannot be charged differently than customers who do not receive a LIHEAP grant.
7 Therefore, Columbia must apply the "plus" charge to all CAP customers.

8

9 Q. How will CAP customers be notified of this change?

10

11 A. CAP customers will receive a bill message on the first bill applying the "plus"
12 charge. The bill message will itemize the charge and encourage customers to
13 apply for LIHEAP to reduce their monthly payment.

14

15 Q. Are there any other changes proposed by Columbia to its USECP?

16

17 A. In order to stay compliant with DPW LIHEAP vendor agreement, Columbia will post
18 LIHEAP cash payments towards the CAP participants' asked to pay amount
19 portion of the CAP bill which goes to pay current usage. This change will be
20 reflected in next year's USECP filing that Columbia is required to make by June 1,
21 2011 as required in Docket No. L-00000146.

22

23 Q. Does this conclude your testimony?

24

25 A. Yes it does.

Rate CAP – CUSTOMER ASSISTANCE PROGRAM (Continued)

8. Agree not to use any non-essential gas appliance, such as a pool heater.
9. Allow the Company to purchase gas on the customer's behalf.
10. In the case of a CAP applicant who is currently without service, and who has a balance from a prior account, make an upfront payment in satisfaction of the prior balance up to, but no more than, \$150.

MONTHLY PAYMENT OPTIONS

The most affordable payment option for the eligible CAP customer shall be selected from the Options below. The monthly payment will not be less than the average payment received from the customer in the previous twelve (12) months. A minimum payment amount of twenty-five dollars (\$25.00) is required.

- Option #1: Percentage of Income.
 0 – 110% of Poverty = 7%
 110 – 150% of Poverty = 9%
- Option #2: Average of last 12 months of customer payments. (Available for customers with at least six months of uninterrupted service.)
- Option #3: Flat rate of 50% of budget billing (adjusted annually)
- Senior CAP Option: Flat rate of 75% of budget billing for all customers over 60 years of age with no arrears or payment plan default.

In addition to the monthly payment established under either Option #1, #2, #3, or Senior CAP Option, the CAP customer is required to pay a five-dollar (\$5.00) co-payment towards pre-program arrears, as well as an additional amount calculated each year based on the previous year's LIHEAP grants applied to CAP accounts. (C)

A CAP customer's monthly payment shall not exceed the non-CAP budget payment applicable to the customer's account, exclusive of the \$5.00 co-payment towards pre-program arrears. In the event that a CAP customer's monthly payment is determined to exceed the non-CAP budget payment applicable to the customer's account, the applicable information is reviewed to determine if the CAP payment should be lowered or if the customer should be removed from CAP.

SECURITY DEPOSITS

CAP customers will not be charged security deposits.

Any paid security deposits on accounts with an approved CAP application will be credited to the arrears prior to CAP enrollment.

Unpaid security deposits for customers entering into the CAP will be waived after income verification is complete.

(C) Indicates Change

Issued: ~~October 28, 2008~~ August 25, 2010 T. J. Murphy M. Carol Fox
 2008 October 25, 2010

Effective: ~~October 28,~~

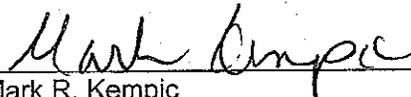
President

VERIFICATION

I, Mark R. Kempic, hereby state that the facts above set forth are true and correct (or are true and correct to the best of my knowledge, information, and belief) and that I expect to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa. C.S. § 4904 (relating to unsworn falsification to authorities).

Date: _____

8/25/2010



Mark R. Kempic
Director, Rates & Regulatory Policy
Columbia Gas of Pennsylvania, Inc.

CERTIFICATE OF SERVICE

I hereby certify that true and correct copies of the foregoing have been served upon the following persons, in the manner indicated, in accordance with the requirements of § 1.54 (relating to service by a participant).

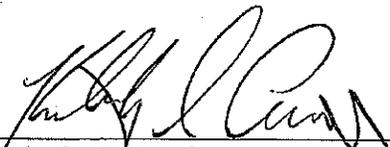
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Date: August 25, 2010



Kimberly S. Cuccia

