

**Before the Pennsylvania Public Utilities Commission**

Interim Guidelines : Docket No. M-2010-2183412  
for Eligible Customer Lists :

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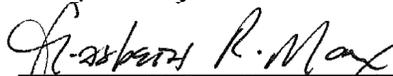
**Additional Statement of Interest in Support of the Comments Filed by the  
Pennsylvania Coalition Against Domestic Violence**

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The Pennsylvania Coalition Against Domestic Violence filed comments on July 11, 2011 in the above captioned proceeding regarding the inclusion of private customer data on the eligible customer list. PCADV attached statements of interest from twenty-five local domestic violence programs, representing thirty Pennsylvania counties, and two statements of interest from national crime victim organizations, the National Center for Victims of Crime and the National Crime Victim Law Institute.

The attached statement of interest is from Domestic Violence Services of Lancaster County, a local domestic violence program, which serves victims of domestic violence in the Lancaster County area. PCADV requests that the attached statement of interest be considered along with the statements attached to PCADV's initial filing.

Respectfully Submitted,



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Dated: July 11, 2011

On behalf of:  
The Pennsylvania Coalition Against  
Domestic Violence



DOMESTIC VIOLENCE SERVICES  
OF LANCASTER COUNTY

A Community Action Program of Lancaster County

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Re: **Statement of Interest and Support for PCADV's Comments**  
**Interim Guidelines for Eligible Customer Lists: Docket No. M-2010-2183412**

Domestic Violence Services of Lancaster County, is a private, non-profit organization working at the local level to assist victims and survivors of domestic violence. The fundamental mission of DVSLC is to eliminate domestic violence in Lancaster County by providing emergency services and safe shelter to victims of domestic violence and their dependent children, as well as a comprehensive program that includes: empowerment counseling, identifying options, choices, and regain control over their life; public education; systems advocacy and social change activities; support for breaking the cycle and intergenerational; and the maintenance of a financially sound and effective administrative body.

Since its inception, DVSLC has provided services to over 65,647 victims of domestic violence and dependent children. Additionally, the program has provided over 318,877 nights of emergency shelter and over 504,112 counseling hours. The 24 hour Hotline has logged over 209,590 crisis calls and volunteers donated in excess of 111,921 hours.

Our program offers a range of services, including safety planning, access to temporary housing, and relocation assistance. These services are essential to providing victims with the assistance necessary to break free from the cycle of violence. These services will be directly impacted by the PUC's order because it will require additional advocacy and resources and may act as a deterrent for some victims attempting to transition to new living situations. Electric service is a basic, fundamental need that victims must be able to access when breaking free from abuse. **But, above all else, a victim's physical safety is often contingent on their ability to protect their private information and maintain their anonymity.** No victim should be forced to choose between access to electricity and safety. But by requiring all electric distribution companies to release personal data of customers to hundreds of electric suppliers, the PUC is essentially forcing victims to make that choice.

The PUC's current order, which provides that victims of domestic violence can opt-out of the release of their information if they affirmatively identify as a victim, does not adequately address victim safety and undermines strong confidentiality provisions contained in the law. Further, the current order places the anonymity of our program's shelter at risk, which is directly contrary to the protections contained in the PFA Act. If forced to affirmatively identify as a shelter in order to opt-out of the release of information, our status as a confidential shelter would be revealed. The opt-out method is fundamentally ineffective to protect victim safety because customers are not adequately apprised of their right to opt-out or of the potential consequences for not opting out. **Therefore, our program firmly supports PCADV's position and urges the PUC to adopt an opt-in program for customer information disclosure because it is the only method that will allow victims to access basic, necessary utilities without sacrificing personal safety.**

Thank you for taking the time to fully consider the relevant interests at stake with this order.

Sincerely,

  
Donna "Bonnie" Glover, DVSLC Director

