

**PENNSYLVANIA PUBLIC UTILITY COMMISSION  
HARRISBURG, PENNSYLVANIA 17105**

**The Commission's Regulation  
Governing the Consumer  
Advisory Council, 52. Pa. Code  
Ch. 91**

**Public Meeting: October 25, 2018  
3004948-LAW  
Docket No. L-2018-3004948**

**STATEMENT OF VICE CHAIRMAN ANDREW G. PLACE**

Before us today for disposition is an Advance Notice of Proposed Rulemaking regarding the Commission's regulations governing the Consumer Advisory Council (CAC). The Commission is exploring whether any changes, including potentially rescinding the regulations, are warranted to improve the efficiency and role of this advisory body. I believe the Council and its members provide value to the Commission and the consumers they represent, both of which are not served if this group and its accompanying authority are stricken from the regulations.

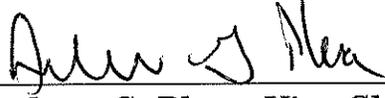
While I agree that regulations should be periodically reviewed to determine their effectiveness, this review of Chapter 91 considers an outcome of rescinding the Commission's regulations including the Council's governance and operations in total and replacing it via a mechanism other than a formal regulation. Additionally, preserving the Council's ability to file comments in proceedings before the Commission and interacting with the media and the public would appear to be of clear public interest. While I encourage comments on these topics, with this understanding, I cannot support the Chapter 91 review.

There are several areas on which the Commission is seeking feedback through the Advance Notice of Proposed Rulemaking. I believe that it would be instructive to receive comments regarding similar consumer advisory councils for other state and/or federal regulatory agencies including the number of their respective members, the scope of their functions, and their interactions with their respective enabling regulatory agencies or other governmental bodies. I am also particularly interested in receiving and reviewing comments that address the additional issues articulated in this Advance Notice of Proposed Rulemaking such as the potential role that the Council can provide to the Commission. I specifically encourage the Consumer Advisory Council, its individual members, and the specific organizations that these members may represent to submit comments at this docket.

There may indeed be ways in which the Council can increase its effectiveness and I am interested in evaluating those ideas and proposals which are not hinged upon a rescission of the CAC's regulatory language. However, because the potential

rescission of this important Council is also part of this proposal, I am dissenting on the issuance of the Advance Notice of Proposed Rulemaking.

**DATE:** October 25, 2018

  
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**Andrew G. Place, Vice Chairman**