

Mitchell Miller  
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January 30, 2019

Pennsylvania Public Utility Commission  
Attn: Secretary  
400 North Street  
Harrisburg, PA 17129

Re: Docket No. L-2018-3004948

To Whom It May Concern,

**RECEIVED**

FEB 1 2019

PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

Thank you for the opportunity to file comments on the Advance Notice of Proposed Rulemaking Order (ANOPR) regarding the Consumer Advisory Council CAC or Council. My comments are based on my over 30 years' experience at the Commission's Bureau of Consumer Services beginning as Chief, Division of Research and Planning (1978-1992), and then Director of Consumer Service from 1992-2009.

I commend the Commission's effort to explore changes to the Council regulations in order to improve its efficiency as an advisory body and to clarify its duties and role after more than 40 years of operation under the present regulations. However, I strongly recommend against the repeal of Chapter 91 and the establishment of the Council via Commission Order. First, I question why there is a need for such a change. During over my 30 years interacting with the Council I have seen ebbs and flows of the effectiveness of policy advocacy and efficiency of Council operations. But a central underlying principle has always been its independence from the Commission's policy perspectives of the time. The Council has often provided a balance to the Commission's new and

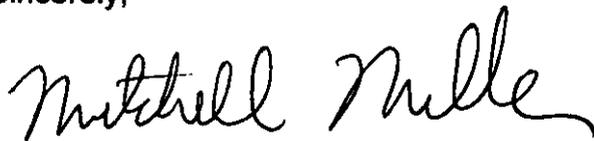
changing policy directives. This was stated distinctly in the Council's own comments in this filing dated 01/22/19, "Rooting the CAC in regulations ensures continuity in the body over time notwithstanding changes of personnel or priorities at the Commission".

I endorse the numerous and well-reasoned points made in the Council filing. However, I will highlight those most important from my perspective. Specifically, I recommend the following to the Commission:

- Continue the current practice that all actions of the Council are to be filed with the Secretary and BCS.
- Empower the Council to explicitly conduct investigations and authorize it to solicit and file comments in public proceedings.
- Continue to allow a Council member to speak to the in public about the work of the Council without Commission approval if the Council grants the member authority by quorum.

Thank you for this opportunity to share my comments.

Sincerely,

A handwritten signature in black ink that reads "Mitchell Miller". The signature is written in a cursive, flowing style.

Mitchell Miller  
Mitch Miller Consulting LLC

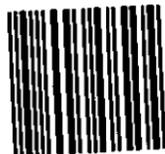
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**/ Mr. Mitchell Miller**  
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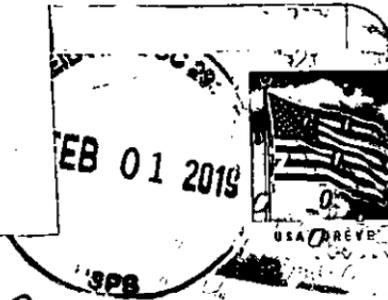


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Pennsylvania Public Utility Commission  
ATTN: Secretary  
400 North Street  
Harrisburg Pa, 17120

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