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April 11, 2022

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor
Harrisburg, PA 17120

VIA E-FILING

RE: Petition to Initiate a Proceeding to Issue a Policy Statement on Electric Utility Rate Design for Electric Vehicle Charging; Docket No. P-2022-3030743

Dear Secretary Chiavetta:

Enclosed for filing with the Pennsylvania Public Utility Commission ("PUC" or "Commission") are the Initial Comments of Citizens' Electric Company of Lewisburg, PA and Wellsboro Electric Company in the above-referenced proceeding.

This filing has been served via email on the parties listed on the attached Certificate of Service. If you have any questions regarding this filing, please feel free to contact the undersigned. Thank you.

Very truly yours,

Pamela C. Polacek

By

Pamela C. Polacek

Counsel to Citizens' Electric Company of Lewisburg, PA and
Wellsboro Electric Company

Enclosure

c: Certificate of Service

Joseph Cardinale, Esq., Law Bureau (via Email)

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

Petition to Initiate a Proceeding :
To Consider Issuance of a Policy : **Docket No. P-2022-3030743**
Statement on Electric Utility Rate :
Design for Electric Vehicle Charging :

**INITIAL COMMENTS OF CITIZENS' ELECTRIC COMPANY OF
LEWISBURG, PA AND WELLSBORO ELECTRIC COMPANY**

TO THE PENNSYLVANIA PUBLIC UTILITY COMMISSION:

Pursuant to the Secretarial Letter issued by the Pennsylvania Public Utility Commission ("PUC" or "Commission") on February 25, 2022, in the above-captioned proceeding, Citizens' Electric Company of Lewisburg, PA ("Citizens") and Wellsboro Electric Company ("Wellsboro") hereby submit the following Initial Comments regarding the Petition filed by ChargEVC-PA. As stated in the Secretarial Letter, these Initial Comments will address solely whether the Commission should initiate a proceeding and the parameters of the proceeding, if opened.

The ChargEVC-PA Petition was filed on February 4, 2022 at Docket No. P-2022-3030743, initiating a formal legal proceeding in which the Commission is requested to consider issuing a policy statement on one specific issue concerning electric vehicles ("EVs") based on perspectives, information and a series of questions posed by ChargEVC-PA. Citizens' and Wellsboro welcome the opportunity for a broad discussion on EVs with all interested stakeholders in a forum facilitated by the Commission. Citizens' and Wellsboro respectfully suggest that the process should be conducted in an informal manner, open to all potentially interested parties, and allow for information gathering on a broad scope of issues facing the Commission on the chosen topic. The Commission should structure the process to allow

stakeholders to participate remotely, like many Commission working groups have been conducting business over the last two years.

Respectfully submitted,

Pamela C. Polacek

By _____
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Counsel to Citizens' Electric Company of
Lewisburg, PA, and
Wellsboro Electric Company

Date: April 11, 2022

CERTIFICATE OF SERVICE

I hereby certify that I am this day serving a true copy of the foregoing document upon the participants listed below in accordance with the requirements of Section 1.54 (relating to service by a participant).

VIA E-MAIL

<p>Steven C. Gray, Esq. Teresa Wagner Office of Small Business Advocate Forum Place 555 Walnut Street, 1st Floor Harrisburg, PA 17101 sgray@pa.gov tereswagne@pa.gov</p>	<p>Michael S. Swerling, Esq. Timothy K. McHugh, Esq. UGI Corporation 460 N. Gulph Road King of Prussia, PA 19406 SwerlingM@ugicorp.com MchughT@ugicorp.com</p>
<p>Patrick Cicero, Esq. Aron J. Beatty, Esq. Harrison W. Breitman, Esq. Office of Consumer Advocate 555 Walnut Street Forum Place - 5th Floor Harrisburg, PA 17101-1921 pcicero@paoca.org ABeatty@paoca.org HBreitman@paoca.org</p>	<p>Michael Zimmerman, Esq. Duquesne Light Company 411 Seventh Avenue, 15-7 Pittsburgh, PA 15219 mzimmerman@duqlight.com</p>
<p>Brendon J. Baatz Officer-ChargEVC-PA Vice President-Gabel Associates 2001 Market Street, Suite 2500 Philadelphia, PA 19103 brendon@gableassociates.com</p>	<p>Kimberly A. Klock, Esq. Michael J. Shafer, Esq. PPL Services Corporation Two North Ninth Street Allentown, PA 18101 kklock@pplweb.com mjshafer@pplweb.com</p>
<p>Paul R. Bonney, Esq. Counsel to ChargEVC-PA 409 Holly Lane Wynnewood, PA 19096 Bonney.paul.r@gmail.com</p>	<p>Tori Giesler, Esq. Joanne Savage FirstEnergy Corporation 76 S. Main Street Akron, OH 44308 tgiesler@firstenergycorp.com jmsavage@firstenergycorp.com</p>

<p>Elizabeth R. Marx, Esq. John W. Sweet, Esq. Lauren N. Berman, Esq. Ria M. Pereira, Esq. Pennsylvania Public Utility Law Project CAUSE-PA 118 Locust Street Harrisburg, PA 17101 pulp@pautilitylawproject.org</p>	<p>Richard Webster, Esq. Jacqueline Golden, Esq. Richard Schlessinger, Esq. PECO Energy Company 2301 Market Street Philadelphia, PA 19103 Dick.webster@peco-energy.com Jacqueline.golden@peco-energy.com Rich.schlessinger@peco-energy.com</p>
<p>Susan E. Bruce, Esq. Charis Mincavage, Esq. McNees Wallace & Nurick LLC 100 Pine Street Harrisburg, PA 17101 sbruce@mcneeslaw.com cmincavage@mcneeslaw.com</p>	<p>Donna M.J. Clark, Esq. Energy Association of Pennsylvania 800 North Third Street Suite 205 Harrisburg, PA 17102 dclark@energypa.org</p>
<p>Leah Meredith Policy Principal Advanced Energy Economy lmeredith@aec.net</p>	<p>Philip B. Jones, Executive Director Alliance for Transportation Electrification 1402 Third Avenue, Suite 1315 Seattle, WA 98101 phil@evtransportationalliance.org</p>

Pamela C. Polacek

Pamela C. Polacek (PA ID No. 78276)

Dated this 11th day of April, 2022, in Venetia, Pennsylvania.