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February 28, 2019

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

**VIA HAND DELIVERY**

**RE: Request of Citizens' Electric Company of Lewisburg, PA; Wellsboro Electric Company, and Valley Energy, Inc. for Waiver of 52 Pa. Code § 53.52(b)(2) to Submit Supporting Data Based Upon a Twelve-Month Period Ended More Than 120 Days Prior to the Date of Filing a Tariff or Tariff Supplement Proposing Increases in Distribution Rates; Docket Nos. \_\_\_\_\_, \_\_\_\_\_ and \_\_\_\_\_**

Dear Secretary Chiavetta:

Citizens' Electric Company of Lewisburg, PA ("Citizens"), Wellsboro Electric Company ("Wellsboro"), and Valley Energy, Inc. ("Valley") (collectively "Companies") hereby request that the Pennsylvania Public Utility Commission ("PUC" or "Commission") grant a waiver of the requirements of 52 Pa. Code § 53.52(b)(2). Specifically, the Companies request a waiver authorizing use of audited financial data for the year ending December 31, 2018, for distribution rate cases the Companies anticipate filing on or before July 1, 2019. For planning purposes, the Companies respectfully request that the Commission address the Companies' request through a Secretarial Letter issued by March 29, 2019.<sup>1</sup>

52 Pa. Code § 53.52(b)(2) requires the Companies to support rate increase filings with operating income statements for a twelve-month period ending no more than 120 days prior to filing. See 52 Pa. Code § 53.52(b)(2). The requested waiver would enable the Companies to align their rate case requests with their fiscal years. Each of the Companies has a fiscal year ending December 31. Allowing each Company to utilize a historic test year ending December 31, 2018, to support its rate filing would benefit the Companies' ratepayers by reducing the complexity of the reporting and analysis needed to support the rate cases. Without a waiver, preparing the supporting data for the historic test year would be substantially more burdensome for the Companies and would ultimately increase the expense of each rate case.

Accordingly, the Companies request that the Commission grant permission to depart from the requirements of 52 Pa. Code § 53.52(b)(2) and authorize the Companies to submit a joint rate filing using a historic test year ended December 31, 2018. As noted above, the Companies

<sup>1</sup> As the Companies are requesting relief in the form of a Secretarial Letter, the Companies elected to file a letter directed to the Secretary. To the extent necessary, the Companies further request waiver of any requirement to file a Formal Petition for Waiver of Section 53.52(b)(2).

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respectfully request issuance of a Secretarial Letter addressing the proposed waiver on or before March 31, 2019.

Very truly yours,

McNEES WALLACE & NURICK LLC

By



Adeolu A. Bakare

Counsel to

Citizens' Electric Company of Lewisburg, PA  
Wellsboro Electric Company  
Valley Energy, Inc.

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