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July 29, 2019

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

**VIA ELECTRONIC FILING**

**RE: Wellsboro Electric Company – Supplement No. 125 to Tariff Electric – Pa. P.U.C. No. 8  
Docket No. R-2019-3008208**

Dear Secretary Chiavetta:

Attached for filing with the Pennsylvania Public Utility Commission is Wellsboro Electric Company's Answer to the Motion of the Joint Statutory Advocates to Reject the Base Rate Filing of Wellsboro Electric Company.

As shown by the attached Certificate of Service, the statutory parties are being duly served with a copy of this filing. Thank you.

Very truly yours,

McNEES WALLACE & NURICK LLC

By

A handwritten signature in black ink, appearing to read 'Adeolu A. Bakare', is written over a horizontal line.

Adeolu A. Bakare

Counsel to Wellsboro Electric Company

c: Chief Administrative Law Judge Charles E. Rainey, Jr. (via E-Mail and First-Class Mail)  
Office of Special Assistants (email only: ra-OSA@pa.gov)  
Certificate of Service

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**CERTIFICATE OF SERVICE**

I hereby certify that I have this day served a true copy of the foregoing document upon the participants listed below in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

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Adeolu A. Bakare

Counsel to Wellsboro Electric Company

Dated this 29<sup>th</sup> day of July, 2019, at Harrisburg, Pennsylvania.

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Wellsboro Electric Company 2019	:	
Distribution Base Rate Filing	:	
	:	Docket No. R-2019-3008208
Supplement No. 125 to Tariff	:	
Electric - Pa. PUC No. 8	:	

**ANSWER TO MOTION OF THE JOINT STATUTORY ADVOCATES TO REJECT  
THE BASE RATE FILING OF WELLSBORO ELECTRIC COMPANY**

Wellsboro Electric Company ("Wellsboro" or "Company") hereby files this Answer ("Wellsboro Answer") to the Motion of the Joint Statutory Advocates ("JSA") to Reject the Base Rate Filing of Wellsboro ("Motion to Reject" or "Motion"), pursuant to Section 5.102(b) of the Pennsylvania Public Utility Commission's ("Commission" or "PUC") Regulations, 52 Pa. Code § 5.102(b). Wellsboro provided a compelling basis for waiver of Rule 53.53 in its Petition for Waiver filed July 1, 2019 ("Petition for Waiver").<sup>1</sup> As described herein, the JSA's arguments that the JSA will be prejudiced if the Commission grants Wellsboro's Petition for Waiver are unfounded. Because the JSA are not prejudiced by the requested waiver, granting of the waiver is in the public interest pursuant to Section 1.9 of the Commission's Regulations, 52 Pa. Code § 1.9. Therefore, Wellsboro respectfully requests that the Commission deny the JSA's Motion to Reject and grant Wellsboro's Petition for Waiver.

**I. SUMMARY OF ANSWER**

The JSA's Motion to Reject alleges that the JSA will be prejudiced by the Company's request to increase its distribution revenues by \$1.42 million without providing the information required under Section 53.53 of the Commission's Regulations. While the JSA acknowledge the

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<sup>1</sup> The JSA consists of the Office of Consumer Advocate, the Office of Small Business Advocate, and the Commission's Bureau of Investigation and Enforcement.

Company has petitioned the Commission for waiver of the Section 53.53 filing requirements, the JSA argue that the Petition is untimely and not justified. However, the JSA have offered only bald and conclusory statements in an attempt to support this assertion. While Wellsboro ultimately bears the burden of proof with respect to its Petition for Waiver, the JSA bear the burden of proof with respect to the Motion. As the moving parties, the JSA have not established, by a preponderance of the evidence, that they would be prejudiced by the Company's filing or that the information set forth in Section 53.53 of the Commission's Regulations is necessary for review of Wellsboro's rate filing. Accordingly, the Commission should reject the Motion and address the Company's Petition for Waiver on its merits.

## **II. BACKGROUND**

On February 28, 2019, Wellsboro, Citizens' Electric Company of Lewisburg, PA ("Citizens"), and Valley Energy, Inc. ("Valley") (collectively, "Companies") jointly filed a Petition to obtain permission to use the 2018 calendar year as the Companies' Historic Test Year ("HTY") for their upcoming rate case to be filed on or before July 1, 2019. Specifically, the Companies sought waiver of the requirement of 52 Pa. Code § 53.52(b)(2) to submit supporting data based on an HTY ended no more than 120 days prior to the date of filing the rate increase request.

On March 25, 2019, the Commission issued a Secretarial Letter granting the Companies' use of calendar year 2018 as their HTY for a rate case filed on or before July 1, 2019.

On July 1, 2019, the Companies filed rate cases. Wellsboro and Valley jointly filed the Petition for Waiver the same day.

On July 22, 2019, the JSA filed separate Motions to Reject the base rate cases of Wellsboro and Valley. The JSA also filed answers to the Petition for Waiver.

On July 24, 2019, the Commission issued a Secretarial Letter stating that Wellsboro's and Valley's rate filings are not consistent with the Commission's filing requirements of Section 53.53 of the Commission's Regulations. 52 Pa. Code § 53.53. The Secretarial Letter directs Wellsboro and Valley to perfect the base rate filings by July 31, 2019, either by providing the information set forth in Section 53.53 or by reducing their respective rate increase to \$1 million.<sup>2</sup> Wellsboro intends to separately appeal this determination to the Commission pursuant to Section 5.44 of the Commission's Regulations. 52 Pa. Code § 5.44. However, as the Secretarial Letter also directs Wellsboro to answer the Motion within five (5) days, Wellsboro hereby files this Answer addressing solely the JSA Motion.

### **III. ANSWER TO JSA MOTION**

#### **A. The Companies' Filing of the Petition for Waiver at the Time of Filing Their Base Rate Cases is Consistent with Commission Rule 1.91.**

In the Motion, the JSA argue that the Commission should reject Wellsboro's base rate case filing because "the filing is untimely and not justified under the law." Motion, at 3. The JSA argue that "the materials provided in the filing are not consistent with the Commission's filing requirements under Section 53.53 of the Commission's Regulations for a distribution base rate increase request in excess of \$1 million." Motion, at 1. Plainly, a filing submitted with a waiver request will necessarily be inconsistent with some aspect of the Regulations, but this observation does not support rejection of the filing. Wellsboro complied with the Commission's Regulations concerning waiver requests.

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<sup>2</sup> On July 29, 2019, Valley filed revised schedules reducing its request to increase base distribution revenues from \$1.034 million to \$834,000. As a result, Valley also filed a letter withdrawing the Petition for Waiver and clarifying that the Motion for Reject filed at Docket No. P-2019-3008209 should be dismissed as moot.

Under Section 1.91 of the Commission's Regulations, 52 Pa. Code § 1.91, waiver requests may be submitted at the time of a filing. The Regulation affirms this process as follows:

A request for waiver of, or exception to, any provision of this chapter or Chapter 3 or 5 (relating to special provisions; and formal proceedings) or a regulation or requirement with which the document tendered is in conflict or does not conform *may accompany a pleading, submittal or other document subject to rejection* under § 1.4 (relating to filing generally). The request shall show the nature of the waiver or exception desired and set forth the reasons in support thereof. Unacceptable filings may be returned by the Commission with an indication of the deficiencies thereof and the reasons for nonacceptance and return.

52 Pa. Code § 1.91(a) (Emphasis added). While Wellsboro acknowledges that the Commission reserves the right to reject the waiver request, the submission of the waiver concurrent with the rate filing itself should not serve as grounds for rejection, particularly where no party would be prejudiced by the requested relief.

Despite Section 1.91 explicitly clarifying that waiver requests can accompany the respective filings for which the waiver is sought, the JSA stated that Wellsboro should have filed its Petition in early June, when the Company determined the amount of its rate increase request. The JSA further allege they are prejudiced by the Company's failure to provide the information set forth in Section 53.53 prior to the July 1 rate filing and that the Company could have filed a further petition for waiver of the HTY period to extend the authorized filing date for a HTY ending December 31, 2018 beyond July 1, 2019.

All of these arguments presume the Commission would have rejected the Petition for Waiver and the Company would have then furnished the additional information with the July 1 rate filing. However, the Company filed the Petition for Waiver to avoid the burdensome filing requirements of Section 53.53. If the Commission is not willing to grant the waiver, then Wellsboro will adjust its request to \$1 million, even though it calculates that it needs \$1.4 million in rate relief. While this outcome would be unfair to small utilities that are stuck with an arbitrary

regulatory threshold that has not been adjusted in 40 years, it also means that Wellsboro would not have filed a rate filing with the Section 53.53 information *regardless of when the waiver was requested*. Accordingly, the JSA would receive the same supporting information whether Wellsboro requested the waiver in early June or with the base rate filing on July 1.

**B. The JSA Have Not Met Their Burden of Proof in Support of the Motion.**

As discussed above, the JSA's primary reason for opposing the Petition for Waiver is that the JSA "will be unfairly prejudiced as the information *needed* to fully assess the Companies' proposed rate increases will have to be developed through discovery." Motion, at 3 (Emphasis added). However, the JSA have not met their burden of proof as to whether the information set forth in Section 53.53 of the Commission's Regulations is "needed" or "necessary" to review the rate filing.

The Public Utility Code at 66 Pa. C.S. § 332(a) allocates the burden of proof to a proponent of a rule or order. *Teltron, Inc. v. Pennsylvania Public Utility Com.*, 83 Pa. Commw. 407, 409 (1984). Accordingly, Wellsboro bears the burden of proof with regard to the Petition for Waiver and the JSA bear the burden of proof as to all allegations set forth in the Motion. In disposing of the Motion, the Commission must determine whether the JSA established, by a preponderance of the evidence, that the information set forth in Section 53.53 of the Commission's Regulations is necessary for review of Wellsboro's rate filing or that the JSA are prejudiced by the omission of the information with request for a wavier. Preponderance of the evidence means that the party with the burden of proof has presented evidence that is more convincing, by even the smallest amount, than that presented by the other party. *Samuel J. Lansberry, Inc. v. Pa. Public Utility Comm'n*, 578 A.2d 600, 602 (1990). Wellsboro submits that the JSA have failed to meet this burden.

As noted above, Wellsboro seeks a waiver of the Section 53.53 filing requirements for public utilities seeking rate increases in excess of \$1 million. Despite this request, the information submitted with Wellsboro's July 1 filing goes beyond the "bare bones" requirements under Section 53.52 and includes many elements of the Section 53.53 requirements, including a Cost of Service Study, bill comparisons, tax calculations, detailed income statements, balance sheets, plant in service and depreciation calculations, and capital structure information. The Index listing the supporting information is attached as Exhibit A. As the JSA have provided no substantive basis to establish a need for the additional filing requirements other than reiterating the Regulation for which Wellsboro seeks a waiver, the Commission should deny the Motion, accept the rate filing and proceed to address the merits of the Petition for Waiver.

The JSA have not demonstrated that the additional information specified in Section 53.53 is needed for review of Wellsboro's rate filing. Much of the \$1.42 million rate increase request is driven by reliability projects necessary to preserve safe and adequate public utility service pursuant to Section 1501 of the Public Utility Code. 66 Pa. C.S. § 1501. Since its last base rate filing in 2016, Wellsboro has experienced little change in terms of usage, customer count, or service territory. In other words, but for necessary capital improvements driving a higher rate increase, Wellsboro is fundamentally the same utility that filed rate cases in 2010 and 2016, both of which the JSA entities reviewed with the same schedules and data submitted here, and without the information required in Section 53.53 of the Commission's Regulations. Wellsboro remains a small electric utility. The JSA regularly reviews rate filings from small utilities using the Section 53.52 informational requirements.

Further, Wellsboro previously sought JSA input on the information to be furnished with the rate filing. While the Company did not formally preview the waiver with the JSA or



Commission staff, counsel for Wellsboro engaged in informal outreach in the context of another proceeding. During the Commission's ongoing Fully-Projected Future Test Year ("FPFTY") stakeholder process, counsel for Wellsboro offered to prepare information beyond the Section 53.52 requirements so the JSA could avoid discovery (and so the Companies could accomplish this work prior to the July 1 filing before discovery deadlines apply).

Finally, the JSA's concerns about being unable to analyze needed information are unpersuasive. By admission, the JSA ask the Commission to enforce Section 53.53 as a "bright line test" without regard for the circumstances addressed in Wellsboro's Petition for Waiver. Motion, at 2. The JSA state that the information required in Section 53.53 "will most certainly" be asked for in discovery but offer no indication of why the information furnished with the Company's filing is insufficient. *Id.*, at 2. This is an important consideration, as the filing requirements in Section 53.53 are the same requirements applicable to the recent \$133.8 million rate increase requested by Duquesne Light Company at Docket No. R-2018-3000124 or the \$81.9 million rate increase requested by PECO Energy Company at Docket No. R-2018-3000164. The JSA Motion provides no basis for its assertion that the information deemed essential for review of these larger rate cases is now the same for Wellsboro because the Company requires a rate increase that exceeds the outdated \$1 million threshold by \$400,000. The Motion provides no specific information as to what omitted schedules, exhibits, or studies are so necessary that the filing must be rejected, but rather seeks a blanket rejection. And as further discussed below, the Motion makes no effort to address the substantive considerations raised in Wellsboro's Petition for Waiver. If the JSA have a compelling reason for the Commission to reject Wellsboro's Petition for Waiver, they have failed to articulate such a reason. Accordingly, the Commission should deny the JSA's Motion.

**C. The JSA Have Not Responded to the Substantive Reasons Supporting Wellsboro's Requested Waiver.**

In the Petition for Waiver, Wellsboro sets forth several substantive reasons for waiver of the Section 53.53 requirements. The JSA, however, have not substantively addressed any of these reasons.

The JSA's Motion omits consideration of the increased rate case expense that will result if the Commission rejects the Petition for Waiver. Complying with the Section 53.53 requirements will increase costs to ratepayers. As stated in the Petition for Waiver, if Wellsboro refiles its rate case in compliance with all of 53.53, the estimated additional cost of producing the information would be considerable, perhaps as high as \$100,000. This is a substantial percentage of the entire increase Wellsboro is requesting. Additionally, the JSA, the Companies, and the Commission will lose a portion of the efficiencies gained from litigating the Wellsboro, Citizens' and Valley rate cases in parallel.

In contrast, if Wellsboro decides to reduce its rate increase to \$1 million, it will likely be forced to return to the Commission for another rate case in 1-2 years, which only increases the costs to Wellsboro's customers and further burdens both Commission and JSA resources. As set forth on Line 32 of the attached schedule, adjusting the request to meet the \$1 million threshold produces a return on rate base of 6.15% in the FPFTY. This is an insufficient return, which will result in an additional rate filing soon after the FPFTY.

Additionally, the JSA Motion ignores the fundamental issue underlying the requested waiver. The \$1 million threshold, established in 1977, is intended to relieve small utilities of the burdensome requirements that would result in disproportionately high costs to their ratepayers. As noted above, Wellsboro remains a small electric utility whose operations, customer counts, and usage have not substantially changed since the JSA litigated Wellsboro's last case by relying on

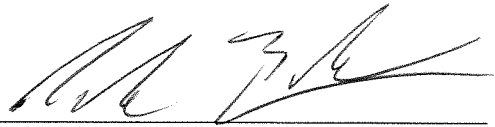
the Section 53.52 requirements. The focal change has been the rate of inflation over time, which has eroded the relevance of the \$1 million figure as a reasonable demarcation point for filing requirements so clearly meant for large utilities. For the reasons set forth above, Wellsboro respectfully requests that the Commission exercise this authority and deny the JSA's Motion.

#### IV. CONCLUSION

WHEREFORE, Wellsboro Electric Company respectfully requests that Your Honors deny the Motion of the Joint Statutory Advocates to Reject the Base Rate Filing of Wellsboro Electric Company.

Respectfully submitted

McNEES WALLACE & NURICK LLC

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Counsel to Wellsboro Electric Company

Dated: July 29, 2019

## **Exhibit A**

### **Index of Supporting Information**

Tab A	Responses to 52 Pa. Code § 53.52(a)
Tab B	Responses to 52 Pa. Code § 53.52(b)
Tab C	Responses to 52 Pa. Code § 53.52(c)
Tab D	Spreadsheets Supporting Proposed Rates
Tab E	Rate of Return Information
Tab F	Proposed Tariff Supplement No. 125 to Tariff Electric - Pa. PUC No. 8
Tab G	Cost of Service Study
Tab H	Summary Chart of Proposed Distribution Rate Changes
Tab I	Customer Notice – Billing Insert and Public Notice
Tab J	Press Release
Tab K	Affidavit of Craig C. Eccher

16-4 (W)

**Wellsboro Electric Company**  
**Rate Case with Fully Projected Future Test Year 2020**  
**Proposed Revenue By Rate Class**  
**Fully Projected Future Test Year 2020**


Line	Account	Balance	RS	RSAE	NRS	NRH	CS	CSH	IS	MSL	POL	EU
<b>PRESENT RATES</b>												
1	Distribution Revenue	5,132,322	2,619,792	25,825	390,322	1,395	1,322,797	1,109	656,296	20,906	86,066	7,813
2	Forfeited Disc / Other Rev	114,725	72,035	932	4,764	61	20,488	61	15,441	216	663	64
3	<b>Total Revenue</b>	<b>5,247,047</b>	<b>2,691,827</b>	<b>26,757</b>	<b>395,086</b>	<b>1,456</b>	<b>1,343,285</b>	<b>1,170</b>	<b>671,737</b>	<b>21,122</b>	<b>86,729</b>	<b>7,877</b>
4	Expenses	5,009,043	2,741,782	31,275	379,704	2,569	1,116,174	2,458	656,005	15,480	55,633	7,962
5	Net income	238,004	(49,955)	(4,518)	15,382	(1,113)	227,111	(1,288)	15,732	5,642	31,096	(85)
6	Rate Base	14,742,561	7,710,808	105,229	971,795	11,201	3,372,024	11,740	2,332,514	49,308	155,026	22,914
7	Return on Rate Base	1.61%	(0.65%)	(4.29%)	1.58%	(9.94%)	6.74%	(10.97%)	0.67%	11.44%	20.06%	(0.37%)
8	Relative Return	1.00 x	(0.40) x	(2.66) x	0.98 x	(6.16) x	4.17 x	(6.79) x	0.42 x	7.09 x	12.42 x	(0.23) x
9												
<b>FULLY ALLOCATED COST OF SERVICE</b>												
11	Distribution Revenue	6,132,317	3,432,646	43,248	456,990	4,296	1,265,341	4,350	850,402	16,113	48,815	10,115
12	Forfeited Disc / Other Revenue	114,725	72,035	932	4,764	61	20,488	61	15,441	216	663	64
13	Revenue Requirement	6,247,042	3,504,681	44,181	461,755	4,357	1,285,829	4,411	865,843	16,329	49,477	10,179
14												
15	Operating expenses	4,573,393	2,616,022	32,265	348,319	3,107	911,120	3,109	608,114	10,991	32,803	7,544
16	GRT	361,807	202,526	2,552	26,962	253	74,655	257	50,174	951	2,880	597
17	Income taxes	404,717	211,680	2,889	26,678	307	92,570	322	64,033	1,354	4,256	629
18	Net income	907,125	474,454	6,475	59,796	689	207,484	722	143,522	3,034	9,539	1,410
19	Return on Rate Base	6.15%	6.15%	6.15%	6.15%	6.15%	6.15%	6.15%	6.15%	6.15%	6.15%	6.15%
20	Revenue Increase Required	999,995	812,854	17,424	66,668	2,901	(57,456)	3,240	194,106	(4,793)	(37,252)	2,302
21	Revenue Increase %	19.06%	30.20%	65.12%	16.87%	199.30%	(4.28%)	276.89%	28.90%	(22.69%)	(42.95%)	29.23%
22												
<b>PROPOSED REVENUE ALLOCATION</b>												
24	Distribution Revenue	6,132,289	3,259,968	33,053	456,990	1,794	1,464,086	1,425	815,086	21,151	68,912	9,822
25	Other Revenue	114,725	72,035	932	4,764	61	20,488	61	15,441	216	663	64
26	Revenue Requirement	6,247,014	3,332,003	33,985	461,755	1,855	1,484,573	1,486	830,528	21,367	69,575	9,886
27												
28	Operating expenses	4,573,393	2,616,022	32,265	348,319	3,107	911,120	3,109	608,114	10,991	32,803	7,544
29	GRT	361,805	192,338	1,950	26,962	106	86,381	84	48,090	1,248	4,066	580
30	Income taxes	404,709	161,550	(71)	26,678	(419)	150,267	(527)	53,781	2,816	10,090	544
31	Net income	907,106	362,094	(159)	59,796	(939)	336,805	(1,180)	120,543	6,312	22,616	1,219
32	Return on Rate Base	6.15%	4.70%	(0.15%)	6.15%	(8.38%)	9.99%	(10.05%)	5.17%	12.80%	14.59%	5.32%
33	Relative Return	1.00 x	0.76 x	(0.02) x	1.00 x	(1.36) x	1.62 x	(1.63) x	0.84 x	2.08 x	2.37 x	0.86 x
34	Progress toward unity		83%	72%	100%	67%	80%	66%	72%	82%	88%	89%
35												
36	Proposed Distribution Increase	999,967	640,176	7,228	66,668	400	141,288	316	158,791	245	(17,154)	2,009
37	Revenue Increase %	19.5%	24.4%	28.0%	17.1%	28.6%	10.7%	28.5%	24.2%	1.2%	(19.9%)	25.7%
38	Total Bill Revenue Increase (a)	7.9%	11.5%	11.5%	9.6%	15.2%	4.3%	15.7%	5.5%	0.7%	(12.8%)	12.9%
39	Average annual increase 2017-2020	2.56%	3.69%	3.69%	3.11%	4.83%	1.42%	4.98%	1.81%	0.22%	(4.45%)	4.13%
40	% of Cost of Service	100%	95%	77%	100%	43%	115%	34%	96%	131%	141%	97%
41	Subsidy given (received)											
42	Present rates	(0)	(174,438)	(6,217)	306	(1,294)	172,673	(1,477)	21,924	4,846	28,593	(455)
43	Proposed revenue allocation	(0)	(112,351)	(6,634)		(1,628)	129,325	(1,903)	22,976	3,278	13,078	(191)
44	Reduction in subsidy		36%	(7%)	100%	(26%)	25%	(29%)	(5%)	32%	54%	58%
45	(a) Assuming 100% default service at GSSR-1 rate as of June 1, 2016											
46												
47	Relative increase	1.00 x	1.25 x	1.44 x	0.88 x	1.47 x	0.55 x	1.46 x	1.24 x	0.06 x	(1.02) x	1.32 x
48	Percent of total increase	100%	64%	1%	7%	0%	14%	0%	16%	0%	(2%)	0%
49												

Exhibit B

**VERIFICATION**

I, Adeolu A. Bakare, Counsel to Wellsboro Electric Company, hereby state that the facts above set forth are true and correct to the best of my knowledge, information and belief, and that I expect to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa. C.S. § 4904 (relating to unsworn falsification to authorities).

7/29/19  
Date

  
\_\_\_\_\_  
Signature