



COMMONWEALTH OF PENNSYLVANIA

May 3, 2023

E-FILED

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

Re: Petition of Pike County Light & Power Company for Approval of a Default Service Plan and Waiver of Commission Regulations / Docket No. P-2023-3039927

Dear Secretary Chiavetta:

Enclosed please find the Notice of Intervention, Public Statement, and Verification, on behalf of the Office of Small Business Advocate (“OSBA”), in the above-captioned proceeding.

Copies will be served on all known parties in this proceeding, as indicated on the attached Certificate of Service.

If you have any questions, please do not hesitate to contact me

Sincerely,

/s/ Nakea S. Hurdle

Nakea S. Hurdle
Assistant Small Business Advocate
Attorney ID No. 203633

Enclosures

cc: Mark Ewen
Parties of Record

2. Representing the OSBA in this proceeding is:

Nakea S. Hurdle
Assistant Small Business Advocate
Office of Small Business Advocate
Forum Place
555 Walnut Street, 1st Floor
Harrisburg, Pennsylvania 17101
(717) 783-2525
(717) 783-2831 (fax)
nhurdle@pa.gov

Respectfully submitted,

/s/ Nakea Hurdle

Nakea Hurdle
Assistant Small Business Advocate
Attorney ID No. 73995

For:
NazAarah Sabree
Small Business Advocate

Office of Small Business Advocate
Forum Place
555 Walnut Street, 1st Floor
Harrisburg, PA 17101
(717) 783-2525

Date: May 3, 2023

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of Pike County Light & Power for :
Approval of Its Default Service Plan and : **Docket No. P-2023-3039927**
Waiver of Commission Regulations :

**PUBLIC STATEMENT OF
THE OFFICE OF SMALL BUSINESS ADVOCATE**

The Small Business Advocate is authorized and directed to represent the interest of small business consumers of utility services in Pennsylvania under the provisions of the Small Business Advocate Act, Act 181 of 1988, 73 P.S. §§ 399.41 - 399.50 (the “Act”). The Act further provides that the Small Business Advocate is to issue publicly a written statement stating concisely the specific interest of small business consumers to be protected by her initiation of protest or intervention in any proceeding involving those interests before the Public Utility Commission (the “Commission”) or any other agency or court. This public statement relates to the filing by the Small Business Advocate of a Notice of Intervention in the matter regarding the Petition filed by Pike County Light and Power Company (“Pike” or the “Company”) requesting approval for the Company’s proposed default service plan (“DSP”) and waiver of Commission regulations (“Petition”) that was filed with the Commission on April 23, 2023.

The Small Business Advocate files a Notice of Intervention in this proceeding to protect the interest of Pike’s small business against Pike’s Petition. A thorough inquiry by the Commission into all of the elements of the Petition is necessary to ensure that Pike’s small business customers will be provided default service at rates that are just, reasonable and nondiscriminatory

In view of the foregoing, the Small Business Advocate will participate in proceedings before the Commission to investigate the reasonableness of Pike’s DSP and proposed waivers.

The Small Business Advocate will ask the Commission to deny or modify any aspect of the Petition that is not proven by Pike to be in accordance with the Public Utility Code and with the Commission's regulation's regarding default service.

Dated: May 3, 2023

VERIFICATION

I, NazAarah Sabree, hereby state that the facts set forth herein above 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).

Date: May 3, 2023



(Signature)

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of Pike County Light & Power for :
Approval of Its Default Service Plan and : **Docket No. P-2023-3039927**
Waiver of Commission Regulations :

I hereby certify that true and correct copies of the foregoing have been served via email (*unless other noted below*) upon the following persons, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

The Honorable Mark A. Hoyer
Administrative Law Judge
Pennsylvania Public Utility Commission
301 5th Avenue, Suite 220
Pittsburgh, PA 15222
mhoyer@pa.gov
nmiskanic@pa.gov

Patrick Cicero, Esquire
Consumer Advocate
Office of Consumer Advocate
555 Walnut Street, 5th Floor
Harrisburg, PA 17101
pcicero@paoca.org

Richard Kanaskie, Esquire
Director
Bureau of Investigation & Enforcement
400 North Street
Commonwealth Keystone Building
Harrisburg, PA 17120
rkanaskie@pa.gov

Whitney E. Snyder, Esquire
Thomas J. Sniscak, Esquire
Phillip D. Demanchick Jr., Esquire
Hawke McKeon & Sniscak LLP
100 North Tenth Street
Harrisburg, PA 17101
wesnyder@hmslegal.com
tjsniscak@hmslegal.com
pddemanchick@hmslegal.com

DATE: May 3, 2023

/s/ Nakea S. Hurdle

Nakea S. Hurdle
Assistant Small Business Advocate
Attorney ID No. 203633