



COMMONWEALTH OF PENNSYLVANIA

June 7, 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 Answer 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

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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

**ANSWER OF THE
OFFICE OF SMALL BUSINESS ADVOCATE
TO THE PETITION OF PIKE COUNTY LIGHT & POWER COMPANY
FOR APPROVAL OF DEFAULT
SERVICE PLAN AND WAIVER OF COMMISSION REGULATIONS**

Pursuant to 52 Pa. Code §5.61(a), the Office of Small Business Advocate (“OSBA”) files this Answer to the Petition of Pike County Light & Power Company (“Pike” or the “Company”) for Approval of Default Service Plan and Waiver of Commission Regulations (“Petition”), that was filed with the Pennsylvania Public Utility Commission (“Commission”) on April 13, 2023, and avers the following in support thereof:

1. The Office of Small Business Advocate is authorized and directed by the Small Business Advocate Act, Act 181 of 1988, 73 P.S. §§ 399.41 - 399.50, to represent the interests of small business consumers of utility services in matters before the Commission.

2. Pike requests that the Commission approve its proposed default service plan (“DSP”) and certain waivers for default service beginning June 1, 2024, through May 31, 2027. Pike also proposes to incorporate a financial hedge in addition to spot market energy purchases to increase price stability for its default service customers.

3. At this time, the OSBA does not oppose Pike continuing to acquire default service electricity for Pike's customers through spot market purchases, although it will evaluate the alternatives considered by the Pike. The OSBA will also evaluate whether the financial hedging strategy proposed in the Petition for those purchases is appropriate.

4. The OSBA also generally agrees and does not oppose Pike's request to continue the default service rate design currently in place. However, the OSBA will evaluate whether the class-specific parameters that determine individual class rates are reasonable and appropriate.

5. The OSBA will evaluate the Company's proposed procurement plan, and consider whether longer-term plans may be more cost-effective, especially considering Pike's uniqueness as a Pennsylvania electric distribution company ("EDC") that is connected to the New York Independent System Operator ("NYISO") and not the Pennsylvania-New Jersey-Maryland Interconnection, LLC ("PJM") to transmit and distribute electricity to Pike customers.

6. The OSBA generally agrees that Pike should acquire alternative energy certificates ("AECs") through competitive procurement. However, the OSBA will evaluate the adequacy of Pike's proposed competitive procurement and any other parts of its proposal to determine whether or not the Pike's propositions are reasonable and appropriate.

The OSBA reserves the right to comment on the details of foregoing, and other, provisions of Pike's default service plan after the OSBA has the opportunity to engage in discovery and has reviewed Pike's anticipated direct testimony.

WHEREFORE, the Office of Small Business Advocate respectfully requests the Commission to direct the Office of Administrative Law Judge to hold hearings on Pike's Petition and issue a Recommended Decision.

Respectfully submitted,

/s/ Nakea S. Hurdle

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

For:

NazAarah Sabree
Small Business Advocate

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Dated: June 7, 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: June 7, 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
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DATE: June 7, 2023

/s/ Nakea S. Hurdle

Nakea S. Hurdle
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