

Karen O. Moury
717.237.6036
kmoury@eckertseamans.com

January 4, 2017

Via Electronic Filing

Rosemary Chiavetta, Secretary
PA Public Utility Commission
P.O. Box 3265
Harrisburg, PA 17105-3265

Re: Pennsylvania Public Utility Commission, Bureau of Investigation & Enforcement v.
Clearview Electric Inc., Docket No. C-2016-2543592

Dear Secretary Chiavetta:

By this letter, Clearview Electric Inc. (“Clearview”) is advising the Bureau of Investigation and Enforcement (“I&E”) and the Office of Administrative Law Judge of an expert witness who Clearview intends to present in this proceeding to supplement the rebuttal testimony of the witnesses who were previously identified in Clearview’s prehearing memorandum filed on September 8, 2016. In the prehearing memorandum, Clearview reserved the right to call additional witnesses and noted that it would identify such witnesses within a reasonable period of time prior to commencement of hearings. Hearings are scheduled for March 21 and 22, 2017. Also, I&E has an opportunity to file surrebuttal testimony on February 13, 2017.

The additional witness is:

Frank Lacey, Principal
Electric Advisors Consulting
3 Traylor Drive
West Chester, PA 19382

Mr. Lacey’s testimony will be presented to rebut the direct testimony of Mr. Daniel Mumford. Specifically, it will address some of the industry-based operational complexities caused by the Polar Vortex; discuss how some other suppliers handled these challenges; discuss tax issues that impact the allegations of overcharging; show how Clearview’s actions were more consumer-oriented than what is required of regulated utilities in Pennsylvania; and discuss the lack of evidence of any serious violations, public health and safety concerns or a failure to correct systemic problems. This testimony will be served along with the rebuttal testimony of Clearview’s previously identified witnesses on January 9, 2017.

Copies have been served on all parties as indicated in the attached certificate of service.

Sincerely,

A handwritten signature in cursive script, appearing to read "Karen O. Moury", with a long horizontal line extending to the right.

Karen O. Moury

KOM/lww
Enclosure

cc: Hon. Elizabeth H. Barnes, w/enc.
Certificate of Service w/enc.


CERTIFICATE OF SERVICE

I hereby certify that this day I served a copy of Clearview Electric's Letter Re: Additional Witness upon the persons listed below in the manner indicated in accordance with the requirements of 52 Pa. Code Section 1.54.

Via Email and/or First Class Mail

Michael L. Swindler, Esq.
Stephanie M. Wimer, Esq.
Bureau of Investigation & Enforcement
PA Public Utility Commission
P.O. Box 3265
Harrisburg, PA 17105-3265
mwindler@pa.gov
stwimer@pa.gov

Dated: January 4, 2017



Karen O. Moury, Esq.