



17 North Second Street  
12th Floor  
Harrisburg, PA 17101-1601  
717-731-1970 Main  
717-731-1985 Main Fax  
www.postschell.com

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Devin Ryan

dryan@postschell.com  
717-612-6052 Direct  
717-731-1981 Direct Fax  
File #: 164740

May 9, 2019

***VIA ELECTRONIC FILING***

Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street, 2nd Floor North  
P.O. Box 3265  
Harrisburg, PA 17105-3265

**Re: Joint Application of PPL Electric Utilities Corporation and Citizens' Electric Company of Lewisburg, PA for All of the Necessary Authority, Approvals and Certificates of Public Convenience for: (1) the Transfer by Sale of Facilities, Rights-of-Way, Easements, Agreements, Customer Lists, and Other Property in West Chillisquaque Township, Northumberland County by Citizens to PPL Electric; (2) Citizens' Abandonment of Service to All of Its Customers in West Chillisquaque Township, Northumberland County; (3) Citizens' Abandonment of All Electric Distribution Service in West Chillisquaque Township, Northumberland County; (4) PPL Electric's Right to Initiate and Provide Service in the Portions of West Chillisquaque Township, Northumberland County Currently Served by Citizens; and (5) any Other Approvals Necessary to Complete the Contemplated Transaction**  
**Docket Nos. A-2019-3008827 and A-2019-3008828**

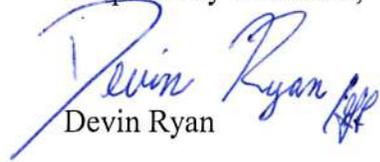
Dear Secretary Chiavetta:

Enclosed for filing are PPL Electric Utilities Corporation and Citizens' Electric Company of Lewisburg, PA's Responses to the Bureau of Technical Utility Services' Data Request Sets I and II in the above-referenced proceeding.

Copies are being provided per the attached Certificate of Service.

Rosemary Chiavetta, Secretary  
May 9, 2019  
Page 2

Respectfully submitted,

  
Devin Ryan

DTR/kl  
Enclosure

cc: Lee Yalcin

## CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been served upon the following persons, in the manner indicated, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

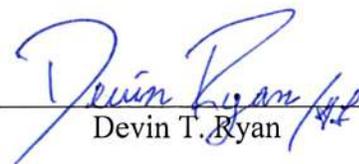
### VIA FIRST CLASS MAIL

Tanya J. McCloskey, Esquire  
Senior Assistant Consumer Advocate  
Office of Consumer Advocate  
555 Walnut Street  
Forum Place, 5th Floor  
Harrisburg, PA 17101-1923

John R. Evans  
Small Business Advocate  
Office of Small Business Advocate  
300 North Second Street, Suite 202  
Harrisburg, PA 17101

Richard A. Kanaskie, Esquire  
Director and Chief Prosecutor  
Bureau of Investigation & Enforcement  
Commonwealth Keystone Building  
400 North Street, 2nd Floor West  
PO Box 3265  
Harrisburg, PA 17105-3265

Date: May 9, 2019

  
Devin T. Ryan

**PPL Electric Utilities Corporation and Citizens' Electric Company of Lewisburg, PA  
Responses to Bureau of Technical Utility Services  
Data Request Set I**

Docket Nos. A-2019-3008827 and A-2019-3008828

**DATA REQUEST 1**

Please provide proof of service to the affected 32 customers currently served by Citizens' Electric Company of Lewisburg, PA and all entities that have pole attachment agreements with Citizens' Electric Company of Lewisburg, PA.

**RESPONDENT:**

Denis R. Pancoast  
Senior Engineer  
PPL Electric Utilities Corporation

**RESPONSE:**

Copies of the Joint Application were served on the affected customers on April 12, 2019, and on the entities with pole attachment agreements on May 2, 2019. Enclosed as Attachments 1 and 2 are copies of the letters and certificates of service evidencing that those copies of the Joint Application were served on those dates, respectively.



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File #: 164740

April 12, 2019

***VIA ELECTRONIC FILING***

Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street, 2nd Floor North  
P.O. Box 3265  
Harrisburg, PA 17105-3265

**Re: Joint Application of PPL Electric Utilities Corporation and Citizens' Electric Company of Lewisburg, PA for All of the Necessary Authority, Approvals and Certificates of Public Convenience for: (1) the Transfer by Sale of Facilities, Rights-of-Way, Easements, Agreements, Customer Lists, and Other Property in West Chillisquaque Township, Northumberland County by Citizens to PPL Electric; (2) Citizens' Abandonment of Service to All of Its Customers in West Chillisquaque Township, Northumberland County; (3) Citizens' Abandonment of All Electric Distribution Service in West Chillisquaque Township, Northumberland County; (4) PPL Electric's Right to Initiate and Provide Service in the Portions of West Chillisquaque Township, Northumberland County Currently Served by Citizens; and (5) any Other Approvals Necessary to Complete the Contemplated Transaction**  
**Docket No. A-2019-3008827 and A-2019-3008828**

Dear Secretary Chiavetta:

On March 22, 2019, the Joint Application of PPL Electric Utilities Corporation and Citizens' Electric Company of Lewisburg, PA was filed in the above-referenced proceeding. Copies of that filing were previously served on the Pennsylvania Public Utility Commission's Bureau of Investigation and Enforcement, the Office of Consumer Advocate and the Office of Small Business Advocate. Additional copies of the Joint Application are being served as indicated on the attached Certificate of Service.

Rosemary Chiavetta, Secretary  
April 12, 2019  
Page 2

Respectfully submitted,



Devin Ryan

DTR/jl  
Enclosures

cc: Certificate of Service  
Tanya J. McCloskey (*Letter & Certificate of Service Only*)  
John R. Evans (*Letter & Certificate of Service Only*)  
Richard A. Kanaskie (*Letter & Certificate of Service Only*)

## CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been served upon the following persons, in the manner indicated, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

### VIA CERTIFIED MAIL RETURN RECEIPT REQUESTED

Adrienne Pinchak  
104 Old Rte 45  
Milton, PA 17847

Michael Akers  
258 Old Rt 45  
Milton, PA 17847

Evonne Crabb  
107 Old Rte 45  
Milton, PA 17847

Luz J Guerrero  
262 Old Route 45  
Milton, PA 17847

Yvonne Undahl  
118 Old Rte 45  
Milton, PA 17847

Jamie Hoey  
268 Old Route 45  
Milton, PA 17847

Robert L Hulsizer  
132 Old Rte 45  
Milton, PA 17847

Chris Garman  
1 Tyler Rd  
Danville, PA 17821

Lisa Shamblen  
154 Old Rte 45  
Milton, PA 17847

Amy Brown  
284 Old Rte 45  
Apt 1  
Milton, PA 17847

Arthur L Bunce  
168 Old Rte 45  
Milton, PA 17847

Patricia H Galazin  
648 Walbash Rd  
Mifflinburg, PA 17844

Keith L Hoover  
190 Old Rte 45  
Milton, PA 17847

Ashley Mahalski  
292 Old Rt 45 Rear  
Milton, PA 17847

Christopher R Schell  
204 Old Rte 45  
Milton, PA 17847

James R Dewire  
292 Old Rte 45 Apt 1  
Milton, PA 17847

Paul A Baskin Jr  
472 W 3rd St  
Bloomsburg, PA 17815

James M Grant  
378 Old Rte 45  
Milton, PA 17847

Julio Bellido  
388 Old Rte 45  
Milton, PA 17847

Robert W Bastian  
416 Old Rte 45  
Milton, PA 17847

Century 21 - Betty Steinbacher  
1008 Washington Blvd  
Williamsport, PA 17701

Mark A Everitt  
46 Old Rt 45  
Milton, PA 17847

Harry J Miller Jr  
503 Old Rte 45  
Milton, PA 17847

Derek Snyder  
53 Old Rte 45  
Milton, PA 17847

Robert C Snyder Farms Inc  
55 Old Rte 45  
Milton, PA 17847

George Connolly  
64 Old Route 45  
Milton, PA 17847

Cynthia A Dauberman  
73 Old State Rte 45  
Milton, PA 17847

Robert C Snyder Farms Inc  
1883 Susquehanna Trail  
Northumberland, PA 17857

Ian Ayers  
90 Old Route 45  
Milton, PA 17847

William E Cooper  
91 Old Rte 45  
Milton, PA 17847

Milton Regional Sewer Auth  
PO Box 433  
5585 State Rte 405  
Milton, PA 17847

Date: April 12, 2019



Devin Ryan



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File #: 164740

May 2, 2019

***VIA ELECTRONIC FILING***

Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street, 2nd Floor North  
P.O. Box 3265  
Harrisburg, PA 17105-3265

**Re: Joint Application of PPL Electric Utilities Corporation and Citizens' Electric Company of Lewisburg, PA for All of the Necessary Authority, Approvals and Certificates of Public Convenience for: (1) the Transfer by Sale of Facilities, Rights-of-Way, Easements, Agreements, Customer Lists, and Other Property in West Chillisquaque Township, Northumberland County by Citizens to PPL Electric; (2) Citizens' Abandonment of Service to All of Its Customers in West Chillisquaque Township, Northumberland County; (3) Citizens' Abandonment of All Electric Distribution Service in West Chillisquaque Township, Northumberland County; (4) PPL Electric's Right to Initiate and Provide Service in the Portions of West Chillisquaque Township, Northumberland County Currently Served by Citizens; and (5) any Other Approvals Necessary to Complete the Contemplated Transaction Docket No. A-2019-3008827 and A-2019-3008828**

Dear Secretary Chiavetta:

On March 22, 2019, the Joint Application of PPL Electric Utilities Corporation and Citizens' Electric Company of Lewisburg, PA was filed in the above-referenced proceeding. Copies of that filing were previously served on the Pennsylvania Public Utility Commission's Bureau of Investigation and Enforcement ("I&E"), the Office of Consumer Advocate ("OCA"), and the Office of Small Business Advocate ("OSBA"). Copies of the Joint Application subsequently were served on the affected customers on April 12, 2019.

Additional copies of the Joint Application are being served on the entities with pole attachment agreements as indicated on the attached Certificate of Service.

Copies of this letter and Certificate of Service are being served on I&E, OCA, and OSBA.

ALLENTOWN HARRISBURG LANCASTER PHILADELPHIA PITTSBURGH PRINCETON WASHINGTON, D.C.

A PENNSYLVANIA PROFESSIONAL CORPORATION

18586619v1

Rosemary Chiavetta, Secretary  
May 2, 2019  
Page 2

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Devin Ryan', with a long horizontal flourish extending to the right.

Devin Ryan

DTR/jl  
Enclosures

cc: Certificate of Service  
Tanya J. McCloskey (*Letter & Certificate of Service Only*)  
John R. Evans (*Letter & Certificate of Service Only*)  
Richard A. Kanaskie (*Letter & Certificate of Service Only*)

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing has been served upon the following persons, in the manner indicated, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

**VIA CERTIFIED MAIL  
RETURN RECEIPT REQUESTED**

Windstream Communications  
50 Executive Parkway  
Hudson, OH 44236

Service Electric Cablevision  
3662 Point Township Drive  
Northumberland, PA 17857

Date: May 2, 2019



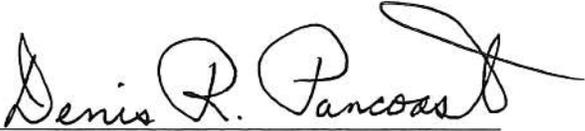
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Devin Ryan

## VERIFICATION

I, DENIS R. PANCOAST, being a Senior Engineer at PPL Electric Utilities Corporation, 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 PPL Electric Utilities Corporation 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: 5/9/2019

  
Denis R. Pancoast

**PPL Electric Utilities Corporation and Citizens' Electric Company of Lewisburg, PA  
Responses to Bureau of Technical Utility Services  
Data Request Set II**

Docket Nos. A-2019-3008827 and A-2019-3008828

**DATA REQUEST 1**

In the above mentioned application, Joint Applicants stated that there are 32 affected customers, however, in their response the Joint Applicants provided the certificate of service to 31 service addresses. Please explain the discrepancy.

**RESPONDENT:**

John Kelchner  
President & CEO  
Citizens' Electric Company of Lewisburg, PA

**RESPONSE:**

There is a difference in the number of customer accounts in the Joint Application and the number of addresses in the Certificate of Service because Yvonne Undahl has two service addresses (*i.e.*, 118 Old Route 45 and 120 Old Route 45) but only one mailing address (*i.e.*, 118 Old Route 45).

I, John A. Kelchner, 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).

A handwritten signature in black ink, appearing to read "John A. Kelchner". The signature is written in a cursive style with a long horizontal flourish extending to the right.