



COMMONWEALTH OF PENNSYLVANIA

January 4, 2021

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 for Approval of Its Default Service Plan and Waiver of Commission Regulations and Nunc Pro Tunc Treatment for the Period June 1, 2021 through May 31, 2024 / Docket No. P-2020-3022988

Dear Secretary Chiavetta:

Enclosed for filing please find the Prehearing Memorandum, on behalf of the Office of Small Business Advocate (“OSBA”), in the above-captioned proceedings. I respectfully request that a copy of any documents filed in this case also be shared with our witness at the address below:

Robert D. Knecht
Industrial Economics, Inc.
2067 Massachusetts Avenue
Cambridge, MA 02140
rdk@indecon.com

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

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

Sincerely,

/s/ Sharon E. Webb

Sharon E. Webb
Assistant Small Business Advocate
Attorney ID No. 73995

Enclosures

cc: Parties of Record
Robert D. Knecht

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of Pike County Light & Power for :
Approval of Its Default Service Plan and :
Waiver of Commission Regulations and : **Docket No. P-2020-3022988**
***Nunc Pro Tunc* Treatment for the Period** :
June 1, 2021 through May 31, 2024 :

**OFFICE OF SMALL BUSINESS ADVOCATE
PREHEARING MEMORANDUM**

I. INTRODUCTION

The Office of Small Business Advocate (“OSBA”) is authorized to represent the interests of small business consumers of utility services before the Pennsylvania Public Utility Commission (the “Commission”) pursuant to the provisions of the Small Business Advocate Act, Act 181 of 1988, 73 P.S. §§399.41 – 399.50 (“the Act”). In order to discharge this statutory duty, the Small Business Advocate deems it necessary to participate as a party to this proceeding. Please address all correspondence as follows:

Sharon E. Webb
Office of Small Business Advocate
555 Walnut Street, 1st Floor
Harrisburg, Pennsylvania 17101
(717) 783-2525
(717) 783-2831 (fax)
swebb@pa.gov

II. BACKGROUND

On November 23, 2020, Pike County Light & Power Company (“PCL&P” or “the Company”) filed a Petition of Pike County Light & Power Company For Approval of Its

Default Service Implementation Plan of June 1, 2021 Through May 31, 2024, (“Petition”) with the Commission pursuant to Section 2807(e) of the Public Utility Code, 66 Pa.C.S. §2807(e). The Petition seeks Commission approval of PCL&P’s program to supply its default service customers for the period from June 1, 2021, through May 31, 2024. On December 29, 2020, the OSBA filed an Answer to the Petition, a Notice of Intervention and Public Statement, and a Notice of Appearance.

III. WITNESS

Assisting in the development and presentation of the OSBA’s position in this proceeding will be:

Mr. Robert D. Knecht
Industrial Economics Incorporated
2067 Massachusetts Avenue
Cambridge, MA 02140
(617) 354-0074
(617) 354-0463 – Fax
rdk@indecon.com

The OSBA requests that all parties serve copies of all documents, including discovery, testimony and briefs, upon Mr. Knecht, simultaneously with service upon the OSBA.

The OSBA anticipates that it will present testimony by Mr. Knecht.

IV. IDENTIFICATION OF ISSUES

The OSBA is participating in this case to ensure that the interests of small business customers of PCL&P are adequately represented and protected. As appropriate and necessary, the OSBA will investigate and analyze the claims and proposals of the other parties, primarily through discovery, cross-examination of witnesses appearing for

those parties, filing of testimony, and briefing of the issues that arise in this proceeding.

The OSBA agrees that PCL&P should continue to acquire default service electricity for PCL&P customers through spot market purchases. The OSBA also agrees that PCL&P should continue the default service rate design currently in place.

The OSBA reserves the right to comment on the details of these, and other, provisions of PCL&P's default service plan after PCL&P has filed its testimony and the OSBA has had the opportunity to engage in discovery.

The OSBA reserves the right to pursue additional issues as they may arise throughout the course of the proceeding.

V. DISCOVERY

The OSBA plans to serve interrogatories and reserves the right to engage in further discovery.

VI. SERVICE OF DOCUMENTS

The OSBA agrees to accept electronic delivery of documents on the due date as satisfying the in-hand requirement.

VII. SETTLEMENT

The OSBA is willing to enter into settlement discussions at any phase of this proceeding.

VIII. PROCEDURAL SCHEDULE

The OSBA will cooperate with the other parties to develop a mutually acceptable schedule for the remainder of this case.

Respectfully submitted,

/s/ Sharon E. Webb

Sharon E. Webb
Assistant Small Business Advocate
Attorney ID No. 73995

For:

John R. Evans.
Small Business Advocate

Office of Small Business Advocate
555 Walnut Street, 1st Floor
Harrisburg, PA 17101
(717) 783-2525
(717) 783-2831 (fax)

Dated: January 4, 2021

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of Pike County Light & Power for :
Approval of Its Default Service Plan and : **Docket No. P-2020-3022988**
Waiver of Commission Regulations and :
***Nunc Pro Tunc* Treatment for the Period** :
June 1, 2021 through May 31, 2024 :

CERTIFICATE OF SERVICE

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

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The Honorable Eranda Vero
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Harrisburg, PA 17120
evero@pa.gov

DATE: January 4, 2021

/s/ Sharon E. Webb

Sharon E. Webb
Assistant Small Business Advocate
Attorney ID No. 73995