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January 8, 2021

VIA ELECTRONIC FILING

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

RE: Pike County Light and Power Company (Gas); Docket No. R-2020-3022134;
**PIKE COUNTY LIGHT AND POWER COMPANY'S PREHEARING
CONFERENCE MEMORANDUM**

Dear Secretary Chiavetta:

Enclosed for filing with the Pennsylvania Public Utility Commission is Pike County Light and Power Company's Prehearing Conference Memorandum in the above-captioned matter.

Thank you for your attention to this matter. If you have any questions, please feel free to contact me at (717) 236-1300.

Very truly yours,

/s/ Whitney E. Snyder

Thomas J. Sniscak
Whitney E. Snyder
Bryce R. Beard

Counsel for Pike County Light and Power Company

WES/das
Enclosures

cc: Honorable Mary Long (via email malong@pa.gov)
Per Certificate of Service

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission	:	Docket No. R-2020-3022134
Office of Consumer Advocate	:	C-2020-3022886
Office of Small Business Advocate	:	C-2020-3022857
Shelley Saul	:	C-2020-3022920
William Yennie III	:	C-2020-3023031
Charles Gillinder	:	C-2020-3023038
Carol Losee	:	C-2020-3023174
Marla Hulse	:	C-2020-3023418
	:	
	:	
v.	:	
	:	
	:	
Pike County Light and Power Company	:	
(Gas)	:	

**PREHEARING CONFERENCE MEMORANDUM
OF PIKE COUNTY LIGHT AND POWER (GAS)**

TO THE HONORABLE MARY LONG:

Pursuant to the December 18, 2020 Prehearing Conference Order in the above-referenced proceeding, Pike County Light and Power Company (Gas) (“Pike”), by and through its attorneys in this matter, Hawke McKeon & Sniscak LLP, submits this Prehearing Conference Memorandum.

A. PROCEDURAL HISTORY

On October 26, 2020, Pike County Light & Power Company (Gas), Utility Code 122400, filed Supplement No. 110 to Tariff Gas - Pa. P.U.C. No. 6 to become effective December 28, 2020, containing proposed changes in rates, rules, and regulations calculated to produce \$262,000 (16%) in additional annual revenues.

On November 13, 2020, the Office of Consumer Advocate (OCA) filed a Formal Complaint to the rate filing docketed at C-2020-3022886.

Also on November 13, 2020, the Office of Small Business Advocate (OSBA) filed a Formal Complaint to the rate filing docketed at C-2020-3022857.

Additionally, five consumer complaints were filed to date by Complainants Saul at Docket No. C-2020-3022920, Yennie at Docket No. C-2020-3023031, Gillinder at Docket No. C-2020-3023038, Losee at Docket No. C-2020-3023174, and Hulse at Docket No. C-2020-3023418.

On December 17, 2020, the Commission, pursuant to the Public Utility Code, 66 Pa. C.S. § 1308(d), suspended the filing by operation of law until July 28, 2021, unless permitted by Commission Order to become effective at an earlier date. The Commission also ordered an investigation to determine the lawfulness, justness, and reasonableness of the rates, rules, and regulations contained in Pike County Light and Power's proposed Supplement No. 110 to Tariff Gas – Pa. PUC No. 6.

On December 18, 2020, an E-serve Notice was issued by the Commission setting a Prehearing Conference in the above-captioned proceedings for January 11, 2021 before the Honorable Mary Long (“ALJ Long”). By Prehearing Conference Order dated December 18, 2020 ALJ Long directed the parties to file Prehearing Conference Memoranda by January 8, 2021.

B. MATTERS FOR DISCUSSION

1. A Proposed Plan and Schedule of Discovery

Pike has responded to extensive discovery requests received from the Bureau of Investigation and Enforcement, the OCA, and the OSBA to date.

Due to the statutory time constraints in this proceeding, Pike proposes the below modifications to the Commission's normal discovery timelines as are commonly adopted in rate cases such as the Columbia Gas of Pennsylvania, Inc at Docket No. R-2020-3018835. Pike also proposes the parties agree to accept service of all documents by email only by 4:30 pm as satisfying in-hand delivery under the Commission's COVID-19 modified procedures at M-2020-3019262.

Discovery Modifications:

- A. Answers to interrogatories shall be served in-hand within ten (10) calendar days unless otherwise agreed to by the parties.
- B. Objections to interrogatories to be communicated orally within three (3) calendar days of service; unresolved objections shall be served on the propounding party in writing within five (5) calendar days of service of interrogatories.
- C. Motions to dismiss objections and/or direct the answering of interrogatories shall be filed within three (3) calendar days of service of written objections.
- D. Answers to motions to dismiss objections and/or direct the answering of interrogatories shall be filed within three (3) calendar days of service of such motions.
- E. Rulings over such motions shall be issued, if possible within seven (7) calendar days of the filing of the motion.
- F. Responses to requests for document production, entry for inspection, or other purposes to be served in-hand within ten (10) calendar days.
- G. Requests for admission to be deemed admitted unless answered within seven (7) calendar days or objected to within five (5) calendar days of service.
- H. Discovery served after 12:00 p.m. on a Friday or the day before a Commission holiday shall be deemed served on the next business day.

2. Possibility of Settlement

Pike will actively seek to participate in settlement discussions with the other parties.

3. Witnesses and Issues

Below is a list of the witnesses and the areas of their testimony comprising Pike's direct case in this proceeding. The subject matters listed below represent as complete a statement of issues that Pike can provide at this stage of the proceeding. Further definition of contested issues by the parties will develop within the scope of the subject matter listed below during the proceeding.

Pike currently intends to offer the following witnesses to testify in the base rate proceeding on the following subject matters:

	Witness	Issues Covered
Statement No. 1	Gas Rate Panel Paul M. Normand – president Debbie L. Gajewski – management consultant Management Applications Consulting, Inc. 1103 Rocky Drive Suite 201 Reading, PA 19609	A) Cost of Service Study B) revenue allocation and rate design C) Impact of proposed rate changes on customers’ bills
Statement No. 2	Gas Accounting Panel Charles Lenns – VP and CFO of Corning Natural Gas Corporation 330 West William Street Corning, New York 14830 Richard Kane – Rate Consultant 77 Leland Avenue Pleasantville, New York 10570	A) Historic financial data and Intercompany cost allocations B) Capital structure C) Rate of return D) Rate base E) Cost of Service F) Gas sales and revenues G) Rate increase
Statement No. 3	Steven Grandinali – General Manager of Pike 105 Schneider Lane, Milford, PA 18337	A) Overview of Company’s gas service B) Gas main replacement program C) Planned system pressure upgrades D) Company operations

4. Schedule

Pike, I&E, and the OCA agree to the following proposed schedule:

	Proposed Schedule
Telephonic Public Input Hearings	Tuesday, January 19, 2021
Other Party’s Direct Testimony	Tuesday, February 2, 2021
Written Rebuttal Testimony	Monday, February 22, 2021
Written Surrebuttal Testimony	Thursday, March 4, 2021
Written Rejoinder Outlines	Monday, March 8, 2021
Hearings – Telephonic	Tuesday, March 9, 2021
Hearings – Telephonic	Wednesday, March 10, 2021
Close of Record	
Main Briefs	Tuesday, March 30, 2021
Reply Briefs	Friday, April 9, 2021
Last Public Meeting before suspension date	Tuesday, June 15, 2021
Suspension date	Wednesday, July 28, 2021

5. Miscellaneous matters for consideration

a. Primary speaker for the prehearing conference

Pike’s counsel, Whitney E. Snyder, will be the primary speaker for purposes of the prehearing conference. In addition, Pike’s counsel Thomas J. Sniscak and Bryce R. Beard will be in attendance.

b. Service List

Pike proposes an active party service list be implemented in this proceeding.

c. Service of Documents

Pike proposes that all due dates for any documents in this proceeding are in-hand the day they are due. Service of documents by email only by 4:30 pm on the due date will be considered in-hand delivery on that date under the Commissions COVID-19 modified procedures at M-2020-3019262. Any pleading or discovery request served after noon on a Friday or day before a holiday shall be considered served the next business day.

d. Protective Order

Pike, I&E, and the OCA have entered into a stipulated protective agreement. Should this matter proceed to hearing, Pike will file a Motion for Protective order at the appropriate time that reflects the terms of the stipulated protective agreement.

Respectfully submitted,

/s/ Whitney E. Snyder

Thomas J. Sniscak, Esquire, Attorney ID No. 33891

Whitney E. Snyder, Esquire, Attorney ID No. 316625

Bryce R. Beard, Esquire, Attorney ID No. 325837

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Counsel for Pike County Light and Power Company

Date: January 8, 2021

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the forgoing document upon the parties, listed below, in accordance with the requirements of § 1.54 (relating to service by a party).

VIA ELECTRONIC MAIL ONLY

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/s/ Whitney E. Snyder

Thomas J. Sniscak, Esq.
Whitney E. Snyder, Esq.
Bryce R. Beard, Esq.

Dated: January 8, 2021