



COMMONWEALTH OF PENNSYLVANIA

January 8, 2021

**E-FILED**

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

**Re: Pennsylvania Public Utility Commission, v. Pike County Light & Power Company  
(Electric) / Docket No. R-2020-3022135**

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 proceeding. 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](mailto:rdk@indecon.com)

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/ 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**

**PENNSYLVANIA PUBLIC UTILITY  
COMMISSION**

v.

**PIKE COUNTY LIGHT AND  
POWER COMPANY (ELECTRIC)**

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**DOCKET NO. R-2020-3022135**

**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 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. Representing the OSBA in this matter is Sharon E. Webb, Assistant Small Business Advocate. Please address all correspondence as follows:

Sharon E. Webb  
Assistant Small Business Advocate  
Office of Small Business Advocate  
555 Walnut Street, 1<sup>st</sup> Floor  
Harrisburg, PA 17101  
(717) 783-2525  
(717) 783-2831 (fax)  
[swebb@pa.gov](mailto:swebb@pa.gov)

**II. IDENTIFICATION OF WITNESSES AND TENTATIVE ISSUES**

Assisting in the development and presentation of the OSBA’s case 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](mailto:rdk@indecon.com)

The OSBA will participate in the proceeding to assure that the interests of small business customers are adequately represented and protected. The OSBA has identified the following issues:

1. Whether the rates, terms, and other provisions of Supplement No. 82 to Tariff Elec - Pa. P.U.C. No. 8 (“Supplement No. 82”)--which was filed on October 26, 2020, by Pike County Light and Power Company (“Pike” or “Company”) - would result in the implementation of rates which would be unjust, unreasonable, unduly discriminatory and otherwise contrary to law, particularly as they pertain to small business customers.
2. Whether the materials filed by the Company are sufficient to justify the rate increase requested, particularly as pertains to small business customers.
3. Whether the Company’s requested return on common equity will provide an excessive return on the Company’s investments and is unjust, unreasonable and contrary to law.

As appropriate and necessary, the OSBA will investigate and analyze the claims of all parties, setting forth the OSBA’s positions through the presentation of testimony by its expert witness, the cross-examination of witnesses appearing for other parties, and the briefing of the issues that arise in this proceeding.

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

**III. HEARING AND BRIEFING SCHEDULE**

The OSBA will work with the other parties to create a mutually acceptable procedural schedule in this matter.

Respectfully submitted,

/s/ Sharon E. Webb

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

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

Dated: January 8, 2021

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**PENNSYLVANIA PUBLIC UTILITY COMMISSION** :  
 :  
 v. : **Docket No. R-2020-3022135**  
 :  
 **PIKE COUNTY LIGHT AND** :  
 **POWER COMPANY (ELECTRIC)** :

**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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Whitney E. Snyder, Esq.  
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(Counsel for BIE)

The Honorable Mary D. Long  
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301 5th Avenue, Suite 2020  
Harrisburg, PA 17120  
[malong@pa.gov](mailto:malong@pa.gov)

DATE: January 8, 2021

/s/ Sharon E. Webb

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