

Kimberly A. Klock
Assistant General Counsel

PPL
Two North Ninth Street
Allentown, PA 18101-1179
Tel. 610.774.5696 Fax 610.774.4102
KKlock@pplweb.com



E-File

July 25, 2022

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor North
P.O. Box 3265
Harrisburg, PA 17120-3265

Re: Petition Requesting Initiation of a Proceeding on Federal Funding Opportunities for Utilities Under the Infrastructure Investment and Jobs Act
Docket No. P-2022-3032929

Dear Secretary Chiavetta:

Enclosed for filing is the Answer of PPL Electric Utilities Corporation to the Petition of the Office of Consumer Advocate, the Office of Small Business Advocate, and the Pennsylvania Utility Law Project in the above-captioned proceeding. Earlier today, this was filed (efiling Confirmation #2427221) without a Verification attached. Please reject the previous filing. The instant filing is complete.

Pursuant to 52 Pa. Code § 1.11, the enclosed document is to be deemed filed on July 25, 2022, which is the date it was filed electronically using the Commission's E-filing system.

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

Respectfully submitted,

A handwritten signature in blue ink that reads "Kimberly A. Klock". The signature is fluid and cursive, with the first name being the most prominent.

Kimberly A. Klock

Enclosure

cc via email: Certificate of Service

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition Requesting Initiation of a Proceeding :
on Federal Funding Opportunities for Utilities : Docket No. P-2022-3032929
under the Infrastructure Investment and Jobs :
Act :

**ANSWER OF PPL ELECTRIC UTILITIES CORPORATION TO THE
PETITION REQUESTING INITIATION OF A PROCEEDING ON FEDERAL
FUNDING OPPORTUNITIES FOR UTILITIES UNDER THE INFRASTRUCTURE
INVESTMENT AND JOBS ACT**

TO THE PENNSYLVANIA PUBLIC UTILITY COMMISSION:

Pursuant to 52 Pa. Code § 5.61, PPL Electric Utilities Corporation (“PPL Electric” or the “Company”) hereby submits its Answer to the above-captioned Petition jointly filed by the Office of Consumer Advocate (“OCA”), Office of Small Business Advocate (“OSBA”), and the Pennsylvania Utility Law Project (“PULP”) (collectively, “Petitioners”), in which they request that the Pennsylvania Public Utility Commission (“Commission”) initiate a proceeding on federal funding opportunities for utilities under the Infrastructure Investment and Jobs Act (“IIJA”).¹ PPL Electric joins in the Answer of the Energy Association of Pennsylvania (“EAP”). However, as one of the jurisdictional fixed utilities that would be directly affected by the Petitioners’ requested relief, the Company separately files this Answer in response to the Petition.

As explained herein, PPL Electric already engages with stakeholders regularly on a variety of topics and would be willing to address, when appropriate, any questions or concerns related to IIJA opportunities during those meetings. However, the Company does not believe that the

¹ On June 23, 2022, the Commission issued a Secretarial Letter directing service of the Petition on all Pennsylvania jurisdictional fixed utilities, including PPL Electric, and establishing a responsive pleading deadline of July 25, 2022.

Petitioners' request for a formal proceeding and reporting requirements should be granted. It is a business decision as to what federal grants, if any, a public utility pursues. The Commission and stakeholders should not, and in fact cannot, act as a super board of directors and dictate which federal grants a public utility should target. Furthermore, applying for federal grants under the IJA is a competitive and time-sensitive process. The Petitioners' proposals would unnecessarily slow down public utilities' efforts to evaluate and apply for IJA grants, potentially resulting in missed opportunities. And, by requiring public utilities to disclose information about the grants they are targeting, public utilities could be forced to reveal to grant competitors which IJA grants they are targeting. Such disclosure would negatively affect the public utilities' ability to apply for and receive the grants.

For these reasons, the Company respectfully submits that the Petition should be denied. In support thereof, PPL Electric states as follows:

I. BACKGROUND

1. PPL Electric is a corporation organized and existing under the laws of the Commonwealth of Pennsylvania. PPL Electric is a wholly-owned direct subsidiary of PPL Corporation.

2. PPL Electric furnishes electric distribution, transmission and default supply services to approximately 1.4 million customers throughout its certificated service territory, which includes all or portions of 29 counties and encompasses approximately 10,000 square miles in eastern and central Pennsylvania.

3. PPL Electric is a "public utility," an "electric distribution company" ("EDC") and a "default service provider" as defined in Sections 102 and 2803 of the Public Utility Code, 66 Pa. C.S. §§ 102, 2803.

4. On June 10, 2022, the Petitioners filed the above-captioned Petition, in which they requested that the Commission: (1) “initiate a proceeding requiring utilities to file regular reports documenting their efforts – past, current, and future – to obtain IJJA funding, the purposes for which they are seeking funding, and the status of any applications, and conditions that must be met to obtain funding”; and (2) “allow utilities and other interested parties to file written comments regarding” the (a) “[i]dentification of all possible programs under the IJJA available to Commission-regulated utilities,” (b) “[r]ecommendations for actions utilities should take with respect to identified programs,” and (c) “[r]ecommendations for actions the Commission should take to facilitate the application, receipt, and deployment of available federal funds.” (Petition, p. 5.)

5. The Petitioners asserted, among other things, that “[t]he Commission should ensure that utilities take advantage of every reasonable opportunity to pursue the IJJA funding available to them, thereby maximizing the Act’s benefits for their customers.” (*Id.*) Moreover, they stated that “allowing the public and stakeholders to evaluate the programs and provide input on the pursuit of IJJA funding will lend critical assistance to the Commission in overseeing this task.” (*Id.*)

6. On June 23, 2022, the Commission issued a Secretarial Letter directing that a copy of the Petition be served on all Pennsylvania jurisdictional fixed utilities and establishing June 25, 2022, as the deadline for responsive pleadings.

7. In accordance with the June 23, 2022 Secretarial Letter, PPL Electric files this Answer in response to the Petition.

II. LEGAL STANDARDS

8. Under Section 5.61(e) of the Commission's regulations, an answer to a petition must be in writing and: (1) advise the parties and the Commission of the parties' positions on the issues raised in the petition; (2) state the parties' standing to participate in any Commission proceeding resulting from the petition; (3) state concisely the facts and matter of law relied upon; and (4) include a copy of a document, or the material part of a document when relied upon in the answer, and if the writing or a copy is not available, the answer must set forth that the document is not available and the reason, and then set forth the substance of the document. 52 Pa. Code § 5.61(e).

III. STANDING TO PARTICIPATE

9. "[T]he core concept of standing is that a person who is not adversely affected in any way by the matter he seeks to challenge is not aggrieved thereby and has no standing to obtain a judicial resolution of his challenge." *Fumo v. City of Phila.*, 972 A.2d 487, 496 (Pa. 2009) (citing *Wm. Penn Parking Garage, Inc. v. City of Pittsburgh*, 346 A.2d 269, 280-81 (Pa. 1975)).

10. To have standing, a party must establish that its interest is substantial, direct, and immediate. *See Del-Aware Unlimited. v. Commonwealth*, 551 A.2d 1117, 1121 (Pa. Cmwlth. 1988) (citation omitted); *1000 Grandview Ass'n v. Mt. Washington Assocs.*, 434 A.2d 796, 797 (Pa. Super. 1981) (citation omitted).

11. To establish a party's interest is "substantial," the interest must exceed the interest "of all citizens in procuring obedience to the law." *In re Hickson*, 821 A.2d 1238, 1243 (Pa. 2003). Further, the party's interest is "direct" when "there is a causal connection between the asserted violation and the harm complained of," and the interest is "immediate" when "that causal

connection is not remote or speculative.” *City of Phila. v. Commonwealth*, 838 A.2d 566, 577 (Pa. 2003).

12. Here, the Petitioners have requested relief that directly affects all Pennsylvania fixed public utilities, including PPL Electric. If granted, the requested relief would impose reporting requirements on the Company and other public utilities and, as explained in this Answer, would negatively affect PPL Electric’s ability to evaluate and apply for IJJA grants in an effective and efficient manner.

13. Thus, the Company has standing because it has a substantial, direct, and immediate interest in this proceeding.

IV. ANSWER TO THE PETITION

A. THE PETITION WOULD ALLOW THE COMMISSION AND STAKEHOLDERS TO ACT, IMPERMISSIBLY, AS A PUBLIC UTILITY’S SUPER BOARD OF DIRECTORS

14. If granted, the Petitioners’ requested relief would open the door to the Commission and stakeholders actively monitoring and recommending which IJJA grants a public utility should target.

15. However, a public utility’s choice to apply for a federal grant, or not, is a business decision over which the Commission should not and cannot control.

16. It is well-established that the Commission “is not empowered to act as a super board of directors for the public utility companies of this state.” *Met. Edison Co. v. Pa. PUC*, 437 A.2d 76, 80 (Pa. Cmwlth. 1981) (“*Met-Ed*”).

17. As the Pennsylvania Supreme Court held over 100 years ago, “the company manages its own affairs to the fullest extent consistent with the protection of the public’s interest,

and only as to such matters is the commission authorized to intervene, and then only for the special purposes mentioned in the act.” *Coplay Cement Mfg. Co. v. Pub. Serv. Comm’n*, 114 A. 649, 650 (Pa. 1921).

18. Furthermore, “it is not within the province of the Commission to interfere with the management of a utility unless an abuse of discretion or arbitrary action by the utility has been shown.” *Met-Ed*, 437 A.2d at 80 (citations omitted).

19. Here, the Petitioners’ requested relief, if granted, would empower the Commission and stakeholders to play a direct role in public utilities’ determination over which IJJA grants, if any, they should target. Such business decisions must be left to the discretion of the individual public utilities and only evaluated by the Commission and stakeholders in the public utility’s next base rate proceeding.

20. Accordingly, the Petition should be denied because the relief requested therein would violate the longstanding prohibition on the Commission acting as a public utility’s super board of directors.

B. THE PETITIONERS’ REQUESTED RELIEF WOULD UNDULY HARM PUBLIC UTILITIES’ EFFORTS TO SECURE IJJA GRANTS

21. The Petition should also be denied because, if granted, it would unduly harm public utilities’ ability to evaluate, apply for, and obtain IJJA grants.

22. First, the Commission needs to recognize that applications for these IJJA grants are a competitive process. It is in a public utility’s best interest for its evaluation and targeting of these grants to remain confidential, so that competitors for these grants do not know which grants the utility is targeting (or not targeting). If the competitors become privy to such information, it would adversely affect the utility’s ability to compete for these grants on a level playing field and may

ultimately result in the utility's losing out on IJJA grant opportunities, to the detriment of the utility and its customers.

23. Second, the establishment of a formal proceeding and reporting requirements would needlessly complicate public utilities' efforts to evaluate and apply for IJJA grant opportunities. At a time when the Company is actively monitoring and evaluating IJJA grant opportunities, a formal proceeding and reporting requirements would only serve to delay the Company's application for IJJA grants. For example, if the Company must wait for stakeholders' recommendations before applying for IJJA grants, then PPL Electric may miss application deadlines. The simplest and soundest solution is to leave the evaluation of a public utility's pursuit of these grants to the utility's next base rate case.

C. THE PETITIONERS' REQUESTED RELIEF IS UNNECESSARY

24. The Commission also should deny the Petition because the relief requested is unnecessary.

25. PPL Electric already engages with stakeholders regularly on a wide-ranging set of topics. When appropriate, the Company can easily address any questions or concerns related to IJJA opportunities during those meetings. This approach is much better than filing detailed, publicly-available reports with the Commission, in which the Company could be forced to disclose competitively-sensitive information about the IJJA grants that the Company is evaluating and trying to obtain.

26. Moreover, to the extent that the Petition is intended to encourage public utilities to secure IJJA grant funding for projects, PPL Electric needs no such motivation. Already, the Company has been actively monitoring and evaluating IJJA opportunities through engagement at the state and federal level and through other industry platforms. PPL Electric also is considering

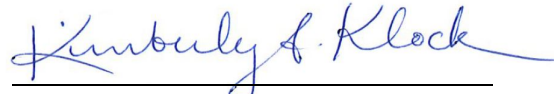
both Company and enterprise-wide opportunities that are available under the IIIA. However, as explained previously, the Petitioners' requested relief would negatively affect the Company's ability to evaluate and apply for IIIA grants in an effective and efficient manner.

27. Based on the foregoing, PPL Electric respectfully requests that the Commission deny the Petition.

V. **CONCLUSION**

WHEREFORE, PPL Electric Utilities Corporation respectfully requests that the Pennsylvania Public Utility Commission deny the Petition filed by the Office of Consumer Advocate, the Office of Small Business Advocate, and the Pennsylvania Utility Law Project.

Respectfully submitted,



Kimberly A. Klock (ID # 89716)

Michael J. Shafer (ID # 205681)

PPL Services Corporation

Two North Ninth Street

Allentown, PA 18101

Phone: 610-774-2599

Fax: 610-774-4102

E-mail: kklock@pplweb.com

mjshafer@pplweb.com

Dated: July 25, 2022

Attorneys for PPL Electric Utilities Corp.

VERIFICATION

I, SALIM SALET, being the Vice President – Distribution Operations 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: 07/25/2022

salim salet
salim salet (Jul 25, 2022 12:29 EDT)

Salim Salet

CERTIFICATE OF SERVICE

(Docket No. P-2022-3032929)

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 ELECTRONIC MAIL

Patrick Cicero, Esquire
Christine Maloni Hoover, Esquire
David T. Evrard, Esquire
Office of Consumer Advocate
555 Walnut Street, Forum Pl. 5th floor
Harrisburg, PA 17101-1923
pcicero@paoca.org
choover@paoca.org
devrard@paoca.org

Steven Gray, Esquire
Teresa Wagner
Office of Small Business Advocate
555 Walnut Street, 1st floor
Harrisburg, PA 17101
sgray@pa.gov
tereswagne@pa.gov

Richard Kanaskie, Director
Allison Kaster, Deputy Chief Prosecutor
Michael Swindler, Deputy Chief Prosecutor
Bureau of Investigation and Enforcement
Commonwealth Keystone Building
400 North Street, 2nd floor west
Harrisburg, PA 17105-3265
rkanaskie@pa.gov
akaster@pa.gov
mwindler@pa.gov

Paul Diskin, Director
Dan Searfoorce
PUC Bureau of Technical Utility Services
400 North Street
Harrisburg, PA 17120
pdiskin@pa.gov
dsearfoorc@pa.gov

Renardo Hicks, Chief Counsel
Kriss Brown, Deputy Chief Counsel
PA Public Utility Commission
Law Bureau
Keystone Building
400 North Street
Harrisburg, PA 17120
rehicks@pa.gov
kribrown@pa.gov

Dan Mumford, Director
Office of Competitive Market Oversight
Pennsylvania Public Utility Commission
400 North Street
Harrisburg, PA 17105
dmumford@pa.gov

Ria M. Pereira, Esquire
Elizabeth R. Marx, Esquire
John W. Sweet, Esquire
Lauren N. Berman, Esquire
Pennsylvania Utility Law Project
118 Locust Street
Harrisburg, PA 17101
PULP@pautilitylawproject.org

Terrance J. Fitzpatrick, Esquire
Donna M.J. Clark, Esquire
Energy Association of Pennsylvania
800 North Third Street, Suite 205
Harrisburg, PA 17102
tfitzpatrick@energypa.org
dclark@energypa.org

Steven J. Samara, President
Susan Carter
Pennsylvania Telephone Association
30 North Third Street
Suite 780
Harrisburg, PA 17101
Steve.samara@patel.org
Sue.carter@patel.org

JT Hand
Mark Wheeler
The York Water Company
130 E. Market Street
York, PA 17401
jth@yorkwater.com
markw@yorkwater.com

John Kelchner
Nate Johnson
Citizens Electric of Lewisburg
1775 Industrial Blvd.
Lewisburg, PA 17837
kelchnerj@citizenselectric.com
johnsonn@citizenselectric.com

David Fisfis
Lindsay Baxer
Megan Good
Duquesne Light Company
411 Seventh Avenue 16-1
Pittsburgh, PA 15219
dfisfis@duqlight.com
lbaxter@duqlight.com
mgood@duqlight.com

Tracy A. Parmer
Matthew N. Gregorits
Scott R. Wyman
Tori Giesler
FirstEnergy Corp.
800 N. Third Street, Suite 100
Harrisburg, PA 17102
tparmer@firstenergycorp.com
mgregorits@firstenergycorp.com
wymans@firstenergycorp.com
tgiesler@firstenergycorp.com

Dick Webster
Richard A. Schlesinger
Amy Neufeld
Anthony E. Gay
PECO Energy Company
2301 Market Street
Philadelphia, PA 19103
Dick.webster@peco-energy.com
Rich.schlesinger@peco-energy.com
Amy.neufeld@exeloncorp.com
Anthony.gay@exeloncorp.com

Edward Verbraak
Pike County Light & Power Company
105 Schneider Lane
Milford, PA 18337
everbraak@pclpeg.com

Michael Swerling
Michael Fessler
Paul Szykman
Robert Beard
UGI Corporation
460 North Gulph Road
King of Prussia, PA 19406
swerlingm@ugicorp.com
mfessler@ugi.com
pszykman@ugi.com
rbeard@ugi.com

Christopher H. Franklin
Marc A. Lucca
Rick Fox
Colleen M. Arnold
Kim Joyce
Alexander R. Stahl
Aqua America/Aqua Pennsylvania Inc.
762 Lancaster Avenue
Bryn Mawr, PA 19010
chfranklin@aquaamerica.com
malucca@aquaamerica.com
rsfox@aquaamerica.com
cmarnold@aquaamerica.com
kajoyce@aquaamerica.com
astahl@aquaamerica.com

Mike Doran
Andrew Clarkson
Joseph Woodward
Sean Graves
Laura Martin
Susan Marsh
Pennsylvania American Water
852 Wesley Drive
Mechanicsburg, PA 17055
Mike.doran@amwater.com
Andrew.clarkson@amwater.com
Joseph.woodward@amwater.com
Sean.graves@amwater.com
Laura.martin@amwater.com
Susan.marsh@amwater.com

Barney Farnsworth
Wellsboro Electric Company
33 Austin Street
Wellsboro, PA 16901
barneyf@ctenterprises.org

Will Pickering
Jen Presutti
Debra Gibson
Pittsburgh Water & Sewer Authority
1200 Penn Avenue
Pittsburgh, PA 15222
wpickering@pgh2o.com
jpresutti@pgh2o.com
dgibson@pgh2o.com

Steve Lubertozzi, President
Community Utilities of Pennsylvania
2335 Sanders Road
Northbrook, IL 60062
Steve.lubertozzi@uiwater.com

Jennifer Maaskant
Audubon Water
2650 Eisenhower Avenue #103A
Valley Forge Corporate Center
Norristown, PA 19403
jennifer@audubonwater.com

Patricia Gendler, CPA
Chief Financial Officer
CAN DO Greater Hazleton
One S. Church Street, Suite 200
Hazleton, PA 18201
pgendler@hazletoncando.com

David Lewis
Columbia Water
220 Locust Street
Columbia, PA 17512
dlewis@columbiawater.net

Richard Pierone
Dan Angove
Newtown Artesian Water Co.
201 N. Lincoln Avenue
Newtown, PA 18940
Richard.pierone@newtownwater.com
dan@newtownwater.com

Jill Campbell
Cody Chapman
Ed Rogers
Jamie Levering
Valley Energy
523 S. Keystone Avenue
PO Box 340
Sayre, PA 18840
jillc@ctenterprises.org
codyc@ctenterprises.org
erogers@ctenterprises.org
jamiel@ctenterprises.org

Thomas J. Sniscak, Esquire
Whitney Snyder, Esquire
Hawke McKeon & Sniscak, LLP
100 N. 10th Street
Harrisburg, PA 17101
tjsniscak@hmslegal.com
wesnyder@hmslegal.com

Judith McCoy Jordan
John Hollenbach
Mark Baker
SUEZ Water Pennsylvania
6310 Allentown Blvd.
Harrisburg, PA 17112
Judith.jordan@suez.com
John.hollenbach@suez.com
Mark.baker@suez.com

Robert Powelson
Rik Hull
National Association of Water Companies
Two Liberty Place
50 S. 16th Street, Suite 2725
Philadelphia, PA 19102
RFP@nawc.com
Rik@nawc.com

Pamela Polacek
C&T Enterprises
1775 Industrial Blvd.
Lewisburg, PA 17837
ppolacek@ctenterprises.org

Michael German, President & CEO
Russell Miller, CIO
Chuck Lenns, CFO & Treasurer
Jessica Buterbaugh
Leatherstocking Gas Company
330 W. William Street
Corning, NY 14830
mgerman@corninggas.com
rmiller@corninggas.com
clenns@corninggas.com
jbuterbaugh@corninggas.com

Mark Kempic
Pete Trufahnestock
Lloyd Yates
Columbia Gas of Pennsylvania
800 North 3rd Street, Suite 204
Harrisburg, PA 17102
mkempic@nisource.com
ptrufahnestock@nisource.com
lloyd Yates@nisource.com

Michael Colpoys
Kurt Meighen
Edward Damico
Dominick A. Sisinni
National Fuel Gas Distribution Corporation
1100 State Street
PO Box 2081
Erie, PA 16512
colpoysm@natfuel.com
meighenk@natfuel.com
damicoe@natfuel.com
sisinnid@natfuel.com

Michael Huwar
Paul Becker
William Roland
Lynda Petrichevich
Andrew Wachter
Carol Scanlon
Michael Turzai
People's Natural Gas Company, LLC
375 North Shore Drive
Pittsburgh, PA 15212
Michael.huwar@peoples-gas.com
Paul.becker@peoples-gas.com
William.roland@peoples-gas.com
Lynda.w.petrichevich@peoples-gas.com
Andrew.wachter@peoples-gas.com
Carol.scanlon@peoples-gas.com
Michael.turzai@peoples-gas.com

Seth Shapiro
Denise Adamucci
Florian Teme
Raquel Guzman
Philadelphia Gas Works
800 West Montgomery Avenue
Philadelphia, PA 19122
Seth.shapiro@pgworks.com
Denise.adamucci@pgworks.com
Florian.teme@pgworks.com
Raquel.guzman@pgworks.com

Douglas R. Smith
Suzan D. Paiva
Verizon Pennsylvania LLC
900 Race Street, 6th Floor
Philadelphia, PA 19107
Douglas.r.smith@verizon.com
Suzan.d.paiva@verizon.com

Jeanne Shearer
Brian Harman
Windstream Communications
124 East Main Street
Ephrata, PA 17522
Jeanne.shearer@windstream.com
Brian.harman@windstream.com

Russell Johnson
Carl Yastremski
Cassandra Guinness
Frontier Communications
100 CTE Drive
Dallas, PA 18612
Russell.johnson@ftr.com
Carl.yastremski@ftr.com
Cassandra.guinness@ftr.com

Joshua Motzer
Sue E. Benedek
CenturyLink
37 W. Broad Street, Suite 470
Columbus, OH 43215
Josh.motzer@centurylink.com
Sue.benedek@centurylink.com

Jim Warta
Consolidated Communications of PA
4008 Gibsonia Road
Gibsonia, PA 15044
James.warta@consolidated.com

VIA FIRST CLASS MAIL

Andreassi Gas Company
1073 Kittanning Pike
Chicora, PA 16025

North East Heat & Light Company
10700 W. Main Road
North East, PA 16428

C.E. Dunmire Gas Company
165 Roundtop Drive
Kittanning, PA 16201

Pine-Roe Natural Gas Company Inc.
151 Hotel Drive
Clarion, PA 16214

Chartiers Natural Gas Company, Inc.
203 Kalmar Way
Jeannette, PA 15644

Riemer Natural Gas LLC
137 Harris Road
Butler, PA 16002

Herman Oil & Gas Company, Inc.
137 Harris Road
Butler, PA 16002

SAR Gas Company
431 Phipps Road
Kennerdale, PA 16374

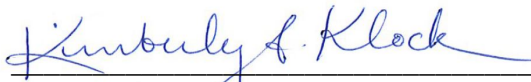
Kaib & Kaib LLC
501 Grant Street, Suite 100
Pittsburgh, PA 15219

Sigel Gas Company
1990 Packing Road, Suite 2
New Bethlehem, PA 16242

Larkin Oil & Gas Company
217 Main Street
PO Box 58
Callensburg, PA 16213

Wally Gas Company
105 Front Street
PO Box 191
Chicora, PA 16025

Date: July 25, 2022


Kimberly A. Klock