



COMMONWEALTH OF PENNSYLVANIA

June 20, 2024

E-FILED

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

Re: Joint Default Service Plan for Citizens' Electric Company of Lewisburg, PA for the Period June 1, 2025 through May 31, 2029 / Docket Nos. P-2024-3049357

Dear Secretary Chiavetta:

Enclosed please find the Notice of Intervention, Public Statement, and Verification on behalf of the Office of Small Business Advocate (“OSBA”), in the above-captioned proceeding.

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/ Steven C. Gray

Steven C. Gray
Senior Attorney
Assistant Small Business Advocate
Attorney ID No. 77538

Enclosures

cc: Parties of Record

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission	:	
	:	
v.	:	Docket Nos. P-2024-3049357
	:	
Joint Default Service Plan for Citizens' Electric Company of Lewisburg, PA, for the Period June 1, 2025 through May 31, 2029	:	
	:	

**NOTICE OF INTERVENTION
OF THE OFFICE OF SMALL BUSINESS ADVOCATE**

The Office of Small Business Advocate (“OSBA”) files this Notice of Intervention with respect to the default service plan that was filed with the Pennsylvania Public Utility Commission (“Commission”) on May 31, 2024, by Citizens’ Electric Company of Lewisburg, PA (“Citizens”) for approval of a Joint Default Service Plan for the Period June 1, 2025, through May 31, 2029. In support of this Intervention, the OSBA avers as follows:

1. The OSBA is an agency of the Commonwealth of Pennsylvania authorized by the Small Business Advocate Act (Act 181 of 1988, 73 P.S. §§ 399.41 – 399.50) to represent the interest of small business customers as a party in proceedings before the Commission.

2. Representing the OSBA in this proceeding is:

Steven C. Gray, Esq.
Senior Attorney
Assistant Small Business Advocate
Office of Small Business Advocate
Forum Place
555 Walnut Street, 1st Floor
Harrisburg, PA 17101
(717) 783-2525
sgray@pa.gov

Respectfully Submitted,

/s/ Steven C. Gray

Steven C. Gray
Senior Attorney
Assistant Small Business Advocate
Attorney I.D. No. 77538

For:
NazAarah Sabree
Small Business Advocate

Commonwealth of Pennsylvania
Office of Small Business Advocate
Office of Small Business Advocate
Forum Place
555 Walnut Street, 1st Floor
Harrisburg, PA 17101

Date: June 20, 2024

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission	:	
	:	
v.	:	Docket Nos. P-2024-3049357
	:	
Joint Default Service Plan for Citizens' Electric Company of Lewisburg, PA, for the Period June 1, 2025 through May 31, 2029	:	
	:	

**PUBLIC STATEMENT OF
THE OFFICE OF SMALL BUSINESS ADVOCATE**

The Small Business Advocate is authorized and directed to represent the interest of small business consumers of utility services in Pennsylvania under the provisions of the Small Business Advocate Act, Act 181 of 1988, 73 P.S. §§ 399.41 - 399.50 (the “Act”). The Act further provides that the Small Business Advocate is to issue publicly a written statement stating concisely the specific interest of small business consumers to be protected by her initiation of or intervention in any proceeding involving those interests before the Pennsylvania Public Utility Commission (“Commission”) or any other agency or court. This public statement relates to the filing today by the Small Business Advocate of a Notice of Intervention in the Joint Default Service Plan of Citizens’ Electric Company of Lewisburg, PA (“Citizens”) which seeks approval for the period from June 1, 2025, through May 31, 2029 (“DSP VII”).

The Small Business Advocate files a Notice of Intervention in order to protect the interests of the Citizens’ small business customers. A thorough inquiry by the Commission into all of the elements of DSP VII is necessary to ensure that it is lawful, just, reasonable, and not unduly discriminatory.

In view of the foregoing, the Small Business Advocate will participate in proceedings before the Commission to investigate the reasonableness of the proposed terms and rates proposed in Citizens' DSP VII. The Small Business Advocate will ask the Commission to deny any proposed rate increase or other changes in Citizens' present tariffs that apply to small business customers that are not proven to be lawful, just, reasonable, and non-discriminatory.

Dated: June 20, 2024

VERIFICATION

I, NazAarah Sabree, hereby state that the facts set forth herein above 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).

Date: June 20, 2024



(Signature)

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission :
 :
 : **v.** : **Docket Nos. P-2024-3049357**
 :
 :
 Joint Default Service Plan for Citizens' :
 Electric Company of Lewisburg, PA, for :
 the Period June 1, 2025 through May 31, :
 2029 :

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).

The Honorable Conrad A. Johnson
Administrative Law Judge
Pennsylvania Public Utility Commission
Piatt Place, Suite 220
201 Fifth Avenue
Pittsburgh, PA 15222
cojohnson@pa.gov

Allison Kaster, Esquire
Director
Bureau of Investigation & Enforcement
400 North Street
Commonwealth Keystone Building
Harrisburg, PA 17120
akaster@pa.gov

Patrick Cicero, Esquire
Consumer Advocate
Office of Consumer Advocate
555 Walnut Street, 5th Floor
Harrisburg, PA 17101
pcicero@paoca.org

Pamela C. Polacek, Esquire
C&T Enterprises, Inc.
P.O. Box 129
Venetia, PA 15367
ppolacek@ctenterprises.org

Adeolu A. Bakare, Esquire
Rebecca Kimmel, Esquire
McNees Wallace & Nurick LLC
100 Pine Street
Harrisburg, PA 17101
abakare@mcneeslaw.com
rkimmel@mcneeslaw.com

DATE: June 20, 2024

/s/ Steven C. Gray

Steven C. Gray
Senior Attorney
Assistant Small Business Advocate
Attorney I.D. No. 77538