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September 24, 2024

Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street, 2nd Floor  
Harrisburg, PA 17120

**VIA ELECTRONIC FILING**

**RE: Joint Default Service Plan for Citizens' Electric Company of Lewisburg, PA and Wellsboro Electric Company For the Period June 1, 2025 through May 31, 2029  
Docket Nos. P-2024-3049357 and P-2024-3049359**

Dear Secretary Chiavetta:

Attached for filing with the Pennsylvania Public Utility Commission is the Motion for Admission of Evidence of Citizens' Electric Company of Lewisburg, PA ("Citizens") and Wellsboro Electric Company ("Wellsboro") (together, the "Companies").

As evidenced by the attached Certificate of Service, all parties to this proceeding are being duly served with a copy of this document. Thank you.

Sincerely,

A handwritten signature in black ink, appearing to read 'Adeolu A. Bakare', written over a horizontal line.

Adeolu A. Bakare  
MCNEES WALLACE & NURICK LLC

c: Administrative Law Judge Conrad A. Johnson (via email)  
Certificate of Service

**CERTIFICATE OF SERVICE**

I hereby certify that I have this day served a true copy of the foregoing document upon the participants listed below in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

**VIA E-MAIL OR FIRST-CLASS MAIL**

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Adeolu A. Bakare

Counsel to Citizens' Electric Company of  
Lewisburg, PA and Wellsboro Electric Company

Dated this 24<sup>th</sup> day of September, 2024, at Harrisburg, Pennsylvania

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Joint Default Service Plan for Citizens'	:	
Electric Company of Lewisburg, PA and	:	Docket Nos.: P-2024-3049357
Wellsboro Electric Company for the Period	:	P-2024-3049359
of June 1, 2025 Through May 31, 2029	:	

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**MOTION FOR ADMISSION OF EVIDENCE**

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**TO THE HONORABLE CONRAD JOHNSON, ADMINISTRATIVE LAW JUDGE:**

The undersigned move for admission into the evidentiary record of the documents and findings identified in the Stipulation for Admission of Evidence ("Stipulation") attached hereto as Appendix A. This Motion and the Stipulation are being submitted in conjunction with the Settlement reached between Citizens' Electric Company of Lewisburg, PA, Wellsboro Electric Company, the Office of Consumer Advocate, and the Office of Small Business Advocate ("Parties"), the Parties' waiver of cross-examination, and the directive from Your Honor to offer any documents to be considered as evidence in support of the Joint Petition for Settlement for admission to the record.

The Parties to this proceeding have stipulated the authenticity or accuracy of the documents and findings listed therein. The Parties have additionally waived cross-examination of the witnesses sponsoring the Direct Testimony statements appended to the Company's initial filing as well as the witness for OCA's Verified Statement No. 1, subject only to contingencies in the Joint Petition for Settlement reserving litigation rights in the event the Commission rejects the Settlement.

Accordingly, the Parties request that Your Honor grant this Motion and admit into the evidentiary record the documents and findings set forth in Appendix A. A copy of the documents and findings listed in the Stipulation will be filed with the Secretary of the Commission after this Motion is granted.

Respectfully submitted:

McNEES WALLACE & NURICK LLC

Dated: September 24, 2024

By: 

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*Counsel for Office of Consumer Advocate*

Signed by:

*Steven Gray*

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*Counsel for Office of Small Business Advocate*

**APPENDIX A**

**STIPULATION FOR ADMISSION  
OF EVIDENCE**

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Joint Default Service Plan for Citizens'	:	
Electric Company of Lewisburg, PA and	:	Docket Nos.: P-2024-3049357
Wellsboro Electric Company for the Period	:	P-2024-3049359
of June 1, 2025 Through May 31, 2029	:	

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**STIPULATION FOR ADMISSION OF EVIDENCE**

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The undersigned, being all of the active parties to this proceeding: (1) hereby stipulate the authenticity of the documents listed in Attachment 1, which were previously served upon all parties in this proceeding and upon the presiding Administrative Law Judge; (2) further stipulate to the accuracy of the findings listed in Attachment 2; (3) acknowledge and agree that they waive cross-examination with respect to the Companies' Direct Testimony and OCA's Verified Statement No. 1 subject to the exception stated in the Joint Petition if the Commission were to reject the Settlement; and (4) further stipulate that the documents in Attachment 1 and the findings in Attachment 2 should be admitted into the record in this case.

Accordingly, this Stipulation for Admission of Evidence is hereby submitted.

Dated: September 24, 2024

Respectfully:

McNEES WALLACE & NURICK LLC

By: 

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*Emily A. Farren*

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Office of Consumer Advocate

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*Counsel for Office of Consumer Advocate*

Signed by:

*Steven Gray*

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*Counsel for Office of Small Business Advocate*

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**JOINT DEFAULT SERVICE PLAN FOR CITIZENS' ELECTRIC COMPANY  
OF LEWISBURG, PA AND WELLSBORO ELECTRIC COMPANY FOR THE PERIOD  
OF JUNE 1, 2025 THROUGH MAY 31, 2029;  
DOCKET NOS. P-2024-3049357 AND P-2024-3049359**

**ATTACHMENT 1**

**STATEMENTS AND EXHIBITS FOR ADMISSION INTO THE EVIDENTIARY RECORD**

<b>Party</b>	<b>Witness</b>	<b>Hearing Exhibit</b>	<b>Direct Testimony/Exhibits</b>
Citizens/ Wellsboro	Byron Farnsworth Nathan Johnson Melissa Sullivan	CW Exhibit 1 (May 31 Joint Default Service Plan, including Appendices A – H)	
Citizens/ Wellsboro	Byron Farnsworth		CW Statement No. 1 Exhibit __ (BF-1) Exhibit __ (BF-2)
Citizens/ Wellsboro	Nathan Johnson		CW Statement No. 2 Exhibit __ (NJ-1) Exhibit __ (NJ-2) Exhibit __ (NJ-3) Exhibit __ (NJ-4)
Citizens/ Wellsboro	Melissa Sullivan		CW Statement No. 3 Exhibit __ (MS-1) Exhibit __ (MS-2)
Office of Consumer Advocate	Dr. Serhan Ogur		OCA Verified Statement No. 1

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**JOINT DEFAULT SERVICE PLAN FOR CITIZENS' ELECTRIC COMPANY  
OF LEWISBURG, PA AND WELLSBORO ELECTRIC COMPANY FOR THE PERIOD  
OF JUNE 1, 2025 THROUGH MAY 31, 2029;  
DOCKET NOS. P-22024-3049357 AND P-2024-3049359**

**ATTACHMENT 2**

**STIPULATED FINDINGS OF FACT  
FOR ADMISSION INTO THE EVIDENTIARY RECORD**

1. On July 18, 2024, the Companies, OCA, and OSBA conducted an informal Technical Conference in the above-caption docket, where the Companies made witnesses available to the OCA and OSBA expert witnesses to answer questions on the DSP Petition.

2. OCA Witness Dr. Serhan Ogur participated in the Technical Conference, as did OSBA Witness Mark Ewen.

3. Company Witnesses Byron Farnsworth, Nathan Johnson, and Melissa Sullivan participated in the Technical Conference.

4. During the Technical Conference, the Company Witnesses were made available for Dr. Ogur and Mr. Ewen to ask questions related to the Company's as-filed Joint Default Service Plan.

5. At the Technical Conference, Dr. Ogur recommended that the Companies consider implementing a mechanism to remove GSSR-2 under or overcollections from the GSSR-1 E-Factor.

6. Dr. Ogur additionally raised concerns that the Companies as-filed DSP VII pricing formula potentially exposed customers to price volatility by limiting the fixed-price product lock-ins to a maximum of 12 months.

7. Dr. Ogur also commented on the Companies' proposal to allow for same-day triggers for the fixed-price supply up to 3 p.m. and initially suggested that the Companies consider a morning trigger time to allow more flexibility for the suppliers. After hearing that the Companies had discussed the same day afternoon trigger with suppliers, Dr. Ogur concurred that an afternoon same-day trigger of 1:30 p.m. would afford sufficient protection against the suppliers pricing the fixed-product under tightened marked conditions.

8. Dr. Ogur discussed the Companies' bid results and indicated that in certain scenarios where market conditions have shifted and an RFP yields a single bid, historical bid results and PJM data alone may not be sufficient to establish the reasonableness of the bid.

9. Dr. Ogur submitted a verified statement, OCA Verified Statement No. 1, in support of the modifications to the Companies' Petition.