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1775 Industrial Blvd. • Lewisburg, PA 17837  
Phone: 570-524-2231 • Fax: 570-524-5887

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Pamela Polacek, Chief Legal & Regulatory Officer  
Direct Mail: P.O. Box 129; Venetia PA 15367  
Direct Phone: 570-724-9469 (o); 717-503-6531 (m)  
[ppolacek@ctenterprises.org](mailto:ppolacek@ctenterprises.org)

February 5, 2025

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

**VIA E-FILING**

**RE: Regulations Governing the Public Utility Commission’s General Provisions, 52 Pa. Code Chapters 1, 3, and 5 (relating to Rules of Administrative Practice and Procedure; Special Provisions; and Formal Proceedings); Docket No. L-2023-3041347**

Dear Secretary Chiavetta:

Citizens’ Electric Company of Lewisburg, PA, Wellsboro Electric Company and Valley Energy, Inc. (“C&T Utilities”) file this letter in lieu of Comments to the Clarified Notice of Proposed Rulemaking Order in regarding the above-referenced proceeding. The C&T Utilities support the Comments submitted by the Energy Association of Pennsylvania (“EAP”). We also wish to comment on the questions raised in Vice Chair Kimberly Barrow’s Statement. The C&T Utilities support the continuation of the Commission’s current policies regarding the settlement of contested proceedings. As smaller utilities, the C&T Utilities routinely coordinate with parties in our proceedings to determine whether we can reach a mutually-acceptable compromise. Settlements can reduce litigation costs, mitigate uncertainty and, at times, accelerate disposition of the proceeding. Despite these advantages to settlements, the C&T Utilities have not viewed the Commission’s policies as indicating that the Commission will look with disfavor on a party’s unwillingness to settle a case.

If you have any questions regarding this filing, please feel free to contact the undersigned. Thank you.

Very truly yours,

*Pamela C. Polacek*

By

Pamela C. Polacek  
Counsel to Citizens’ Electric Company, Wellsboro  
Electric Company and Valley Energy, Inc.

c: Certificate of Service

[RA-PCPRGREVIEW@pa.gov](mailto:RA-PCPRGREVIEW@pa.gov)

Tiffany L. Tran, Esq., Law Bureau (via email)

Colin W. Scott, Esq., Law Bureau (via email)

Karen Thorne, Regulatory Review Assistant, Law Bureau (via email)

**CERTIFICATE OF SERVICE**

I hereby certify that I am this day serving a true copy of the foregoing document upon the participants listed below in accordance with the requirements of Section 1.54 (relating to service by a participant).

**VIA E-MAIL**

Steven C. Gray, Esq.  
Sharon Webb, Esq.  
Office of Small Business Advocate  
Forum Place  
555 Walnut Street, 1st Floor  
Harrisburg, PA 17101  
[sgray@pa.gov](mailto:sgray@pa.gov)  
[swebb@pa.gov](mailto:swebb@pa.gov)

Allison Kaster, Esq.  
Bureau of Investigation and Enforcement  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street, 2nd Floor West  
Harrisburg, PA 17120  
[akaster@pa.gov](mailto:akaster@pa.gov)

Darryl Lawrence, Esq.  
Office of Consumer Advocate  
555 Walnut Street  
Forum Place - 5th Floor  
Harrisburg, PA 17101-1921  
[dlawrence@paoca.org](mailto:dlawrence@paoca.org)

*Pamela C. Polacek*

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Pamela C. Polacek (PA ID No. 78276)

Dated this 5<sup>th</sup> day of February, 2025, in Venetia, Pennsylvania.