



COMMONWEALTH OF PENNSYLVANIA

February 12, 2025

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
(Gas) / Docket No. R-2024-3052357**

Dear Secretary Chiavetta:

Enclosed for filing please find the Prehearing Memorandum, on behalf of the Office of Small Business Advocate (“OSBA”), in the above-referenced 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: Mark Ewen
Parties of Record

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission	:	Docket No. R-2024-3052357
	:	
v.	:	
	:	
Pike County Light & Power Company	:	
(Gas)	:	
	:	

**PREHEARING MEMORANDUM
OF THE OFFICE OF SMALL BUSINESS ADVOCATE**

I. INTRODUCTION

The Office of Small Business Advocate (“OSBA”) is authorized to represent the interests of small business customers of utility services before the Pennsylvania Public Utility Commission (“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 these proceedings. Representing the OSBA in the above-referenced matter are Assistant Small Business Advocates Rebecca Lyttle and Steven C. Gray. Please address all correspondence in that matter as follows:

Rebecca Lyttle, Esq.
Assistant Small Business Advocate
Office of Small Business Advocate
Forum Place
555 Walnut Street, 1st Floor
Harrisburg, PA 17101
relyttle@pa.gov

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
sgray@pa.gov

II. FILING BACKGROUND

On December 30, 2024, pursuant to Section 1308(d) of the Pennsylvania Public Utility Code, 66 Pa C.S. § 1308(d), Pike County Light & Power Company – Gas Division (“Pike Gas” or the “Company”) filed Supplement No. 127 to Tariff Gas – Pa. P.U.C. No. 6. Pike Gas proposes to increase rates to produce additional annual operating revenues of \$905,900 per year in total gas distribution revenues.

The Office of Small Business Advocate (“OSBA”) filed a Complaint on January 16, 2025.

III. IDENTIFICATION OF WITNESS AND TENTATIVE ISSUES

Assisting in the development and presentation of the OSBA’s case in this proceeding will be:

Mr. Mark Ewen
Industrial Economics Incorporated
2067 Massachusetts Ave.
Cambridge, MA 02140
(617) 354-0074
mewen@indecon.com

The OSBA will participate in this proceeding to assure that the interests of small business customers are adequately represented and protected. After an initial review of the materials submitted by Pike Gas, the OSBA has identified the following list of issues that it will evaluate in this proceeding:

- (1) Whether the Company’s proposed class cost of service study reasonably reflects cost

- causation, past practice, and Commission precedent;
- (2) Whether the Company's methodology for classifying and allocating mains costs is fair, accurate, and reasonable;
 - (3) Whether the Company's forecasted increases in total utility plant between historical and future test years is accurate and reasonable;
 - (4) Whether the Company's proposal to include electronic payment fees in its revenue requirement is fair and reasonable, and whether the Company's methodology to implement this change accurately reflects how electronic payment fees were incurred historically;
 - (5) Whether the Company's revenue allocation proposal reasonably reflects a proper class cost of service study, rate gradualism, credible competitive concerns, and other established rate design principles;
 - (6) Whether the Company's proposed rate design for the SC-2 customer classes is consistent with allocated costs and other established rate design principles; and
 - (7) Whether the Company's distribution system charge ("DSIC") revenues are accurately reflected in the Company's tariff filing and if the Company is overcharging DSISC revenues.

The OSBA reserves the right to pursue additional issues that may arise throughout this proceeding.

IV. SERVICE OF DOCUMENTS

In accordance with 52 Pa. Code § 1.54(b)(3)(i), the OSBA agrees to accept electronic mail delivery of documents on the due date¹ as satisfying the in-hand requirement.

¹ In accordance with 52 Pa. Code § 1.56(a)(5), documents must be received by 4:30 pm.

The OSBA requests that email delivery of documents also be provided to its witnesses identified above.

In addition to email copies of pleadings, briefs, and exceptions, the OSBA requests email copies of responses to discovery propounded by the OSBA or any other party.

V. SETTLEMENT

The OSBA notes its willingness to enter into settlement discussions at the appropriate phase of this proceeding.

VI. HEARING AND BRIEFING SCHEDULE

At the time of this writing the parties are working on a proposed procedural schedule.

Respectfully submitted,

/s/ Steven C. Gray

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

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

Dated: February 12, 2025

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission	:	Docket Nos. R-2024-3052357
	:	C-2025-3052972
v.	:	
	:	
Pike County Light & Power Company	:	
(Gas)	:	
	:	

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 Marta Guhl
Administrative Law Judge
Pennsylvania Public Utility Commission
Philadelphia District Office
801 Market Street
Philadelphia, PA 19107
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The Honorable Alphonso Arnold III
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Carrie B. Wright, Esquire
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Date: February 12, 2025

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