

COMMONWEALTH OF PENNSYLVANIA



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February 12, 2025

Via Electronic Filing

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
Docket No. R-2024-3052359

Dear Secretary Chiavetta:

Attached for electronic filing please find the Office of Consumer Advocate's Prehearing Memorandum in the captioned proceeding.

Copies have been served on the parties as indicated on the enclosed Certificate of Service.

Respectfully submitted,

/s/ Ryan Morden

Ryan Morden
Assistant Consumer Advocate
PA Attorney I.D. # 335679
rmorden@paoca.org

Enclosures:

cc: The Honorable Marta Guhl (email only: mguhl@pa.gov)
The Honorable Alphonso Arnold III (email only: alphonarno@pa.gov)
Certificate of Service

CERTIFICATE OF SERVICE

Pennsylvania Public Utility Commission :
v : Docket No. R-2024-3052359
Pike County Light & Power Company :

I hereby certify that I have this day served a true copy of the following document, the Office of Consumer Advocate's Prehearing Memorandum, upon parties of record in this proceeding in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant), in the manner and upon the persons listed below:

Dated this 12th day of February 2025.

SERVICE BY E-MAIL ONLY

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Dated: February 12, 2025

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BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Pennsylvania Public Utility Commission	:	
	:	
v.	:	Docket No. R-2024-3052359
	:	
Pike County Light & Power Company	:	
(Electric)	:	

PREHEARING MEMORANDUM
OF THE
OFFICE OF CONSUMER ADVOCATE

Pursuant to Section 333 of the Public Utility Code, 66 Pa. C.S. Section 333, the Commission’s regulations at 52 Pa. Code Sections 5.221-5.224, and in response to the February 7, 2025, Prehearing Conference Order issued by the Honorable Administrative Law Judges (ALJs) Marta Guhl and Alphonso Arnold III of the Office of Administrative Law Judge (OALJ) of the Pennsylvania Public Utility Commission (Commission), in the above-captioned proceeding, the Office of Consumer Advocate (OCA) provides the following information:

I. INTRODUCTION

On January 14, 2025, Pike County Light & Power Company (Pike or the Company) filed Supplement No. 105 to Tariff Electric – Pa. P.U.C. No. 8, with the Pennsylvania Public Utility Commission, to become effective on March 15, 2025.

The Company is engaged in the business of furnishing electricity service to approximately 5,350 customers, of which 4,210 are residential customers, in Townships of Westfall, Milford, Dingman (in part), Millrift, and Pond Eddy and Boroughs of Milford and Matamoras in Pike County, Pennsylvania.

The Company filed to increase rates to produce additional operating revenues of \$1,874,600 per year above existing rates. Pike additionally proposes to roll into distribution rates its Distribution System Improvement Charge (DSIC) balance of \$269,300. The actual distribution revenue increase in this case as proposed by Pike is \$2,143,900 or 29.1% based upon a future test year ending September 30, 2025.

A residential customer using 674 kWh will see their average bill rise from \$134.29 to \$149.81 per month, or by approximately 11.6%. The Company's proposed rate increase, if approved, would produce an 8.37% overall rate of return on its rate base. Additionally, the filing requests for approval to charge customers a monthly meter reading fee if they opt-out of having an Advanced Metering Infrastructure (AMI) electronic meter device installed on their property. The new AMI system would allow the company to collect meter data remotely. Pike intends to roll out the new system over an 18-month period and plans to allow customers to opt out of installation of the AMI system. Pike proposes a \$41.98 monthly charge to cover the cost of an employee performing manual meter reading if the customer declined installation of the AMI device. Pike is also proposing to implement new disconnection and reconnection fees for its customers. Specifically, Pike proposes to charge customers \$50 for those who wish to voluntarily discontinue service and \$50 to those who wish to reconnect service if it was disconnected voluntarily.

On January 24, 2025, the OCA filed a Formal Complaint, Public Statement and Notice of Appearance in this proceeding to protect the interests of consumers in the Company's service territory and to ensure that the Company is permitted to implement only a level of rates that is just and reasonable and in accordance with sound ratemaking principles.

On January 17, 2025, the Office of Small Business Advocate (OSBA) filed a Notice of Appearance. On January 24, 2025, OSBA filed a Formal Complaint. On January 17, 2025, the Commission's Bureau of Investigation and Enforcement (I&E) filed a Notice of Appearance.

On February 6, 2025, the Commission issued an Order that initiated an investigation into the lawfulness, justness, and reasonableness of the proposed rate increase in this filing in addition to the Company's existing rates, rules, and regulations, assigned this matter to the OALJ for further proceedings as appropriate, and suspended the effective date of the tariff until October 15, 2025. The ALJs assigned to the case, the Honorable Marta Guhl and Alphonso Arnold III, scheduled a Prehearing Conference for Friday, February 14, 2025.

Through the OCA Complaint, the OCA seeks to protect the interests of Pike's customers and ensure that Pike is permitted to implement only those rates that are fully justified under law and in accordance with sound ratemaking principles. The OCA will strive to prevent Pike from collecting all alleged costs that cannot be justified, or are unreasonable or unduly discriminatory, or otherwise violate the Public Utility Code or Commission regulations or orders. The OCA submits that Pike's current and/or proposed rates may be unjustifiable and/or unlawful based upon information filed by the Company in support of its claims.

II. ISSUES

Based upon a preliminary analysis of Pike's general rate increase filing, the OCA has compiled a list of issues and sub-issues which it anticipates will be included in its investigation of the Company's rate request. It is anticipated that other issues may arise and may be pursued once the answers to all the OCA's interrogatories have been received and analyzed. The issues and sub-issues set forth below, and others that may develop during discovery, will be analyzed and presented as appropriate by the OCA with the assistance of its expert witnesses:

A. Rate of Return

1. The OCA will perform a detailed analysis of the cost of common equity claimed by the Company as well as the overall rate of return as claimed by the Company.
2. The OCA will examine whether the capital structure proposed by the Company is representative of the period in which rates will be in effect and is otherwise appropriate for ratemaking purposes.
3. The OCA will examine the embedded cost of debt claimed by the Company to determine whether it is reasonable and appropriate for ratemaking purposes.
4. The OCA will examine the impact of Company's proposed alternative ratemaking mechanisms on its risk profile.

B. Rate Base/ Measure of Value

1. The OCA will examine the reasonableness and accuracy of Company's projections related to the utility plant in service at the time relevant to this proceeding.
2. The OCA will review the Company's claim for plant additions during the FTY.
3. The OCA will investigate whether the Company's adjustment to rate base for depreciation reserve is appropriate.
4. The OCA will examine the Company's projections of non-investor supplied funds, including but not limited to, customer deposits, customer advances for construction, and contributions in aid of construction.
5. The OCA will examine the Company's claim for materials and supplies.
6. The OCA will examine the Company's calculation and amount of cash working capital.
7. The OCA will examine the reasonableness and lawfulness of rate base claims for amounts paid to affiliates, in accordance with Section 2101 of the Public Utility Code. 66 Pa. C.S. § 2101 *et seq.*
8. The OCA will examine the Company's Accumulated Deferred Income Tax (ADIT) balances and excess ADIT balances.
9. The OCA will examine the reasonableness of the Company's proposed AFUDC for land held for future use.

C. Revenues and Expenses

1. The OCA will examine the Company's claimed revenues and any adjustments to the level of revenues.

2. The OCA will seek to ascertain whether the Company's claimed expenses are supported, reasonable, and appropriate.
3. The OCA will examine whether the projected number of customers in the FTY are reasonable and accurate.
4. The OCA will examine whether the Company's claims of sales and revenues during the FTY are reasonable and accurate.
5. The OCA will examine whether the Company's projections of revenues in the future periods are reasonable and accurate including, but not limited to, its billed days adjustments, metered sales and the impact of conservation measures, and miscellaneous revenue adjustments.
6. The OCA will examine whether the Company's projections of number of employees, overtime, and incentive pay are reasonable and accurate.
7. The OCA will examine the costs associated with the accrual of retirement benefits other than pensions for the Company's employees or contributions to pension funds.
8. The OCA will examine the justness and reasonableness of the Company's employee healthcare expense.
9. The OCA will examine the appropriateness of the Company's pro forma claim for rate case expense.
10. The OCA will examine the Company's request for depreciation expenses to determine whether it is just and reasonable.
11. The OCA will examine the justness and reasonableness of the Company's claim for insurance costs.
12. The OCA will examine the justness and reasonableness of the Company's proposed expense amortizations.
13. The OCA will examine the justness and reasonableness of the Company's claim for regulatory commission costs.
14. The OCA will examine the justness and reasonableness of the Company's claims for other operations and maintenance expenses.
15. The OCA will examine the justness and reasonableness of the Company's claims for service company expenses, including the allocated expenses of affiliated interests.
16. The OCA will examine the justness and reasonableness of the Company's claimed rate case normalization period.

17. The OCA will examine any cost savings identified in the most recent Management and Operations Audit should be reflected, if relevant, which was conducted since the Company's prior general rate increase request was filed.
18. The OCA will examine the justness and reasonableness of the Company's claimed uncollectibles expense.
19. The OCA will examine the Company's claimed revenues and any adjustments to the level of revenues.

D. Taxes

1. The OCA will examine issues related to the calculation of taxes including, but not limited to, calculation of federal and state income taxes and the amount of those taxes included as expenses for ratemaking purposes and will examine whether the Company is in compliance including with Act 40 of 2016 (66 Pa. C.S. § 1301.1).
2. The OCA will examine the reasonableness of the Company's proposal regarding the tax repairs deductions, and its claims for income taxes, property taxes, and general assessments.
3. The OCA will examine the effect of the Tax Cuts and Jobs Act on the Company's tax expense and its ADIT accounts and the amount, if any, that needs to be returned to ratepayers as a result.
4. The OCA will examine the Company's level of PURTA and property tax expense.

E. Rate Structure/ Cost of Service / Rate Design/ Tariffs/ Alternative Ratemaking

1. The OCA will examine the reasonableness of Company's proposed distribution or allocation of the revenue increase among customer classes to determine whether the proposal meets all legal requirements and sound ratemaking principles.
2. The OCA will examine Company's cost of service studies, including the methodology used and the reasonableness of the allocations.
3. The OCA will examine the reasonableness and appropriateness of the Company's proposed tariff changes, including all proposed surcharges. This includes the Company's proposed \$41.98 monthly charge for customers who decline to have an AMI installed on their property and \$50 fees for customers who voluntarily request that their service be disconnected and/or reconnected.
4. The OCA will examine all other cost allocation and rate design proposals.

F. Depreciation

1. The OCA will examine the Company's depreciation study, including the proposed service lives, net salvage rates, and depreciation rate calculations to determine if they are reasonable.
2. The OCA will analyze the depreciation rates based upon the actuarial analysis to determine if any modifications are necessary.

G. Low-Income Programs

1. The OCA will analyze current and proposed Company operations, practices, procedures and outreach related to serving low-income customers.
2. The OCA will assess the impact of the Company's proposed rate increase on universal service, including the overall costs of its universal service programs as affected by the Company's rate design.
3. The OCA will examine how Company's proposed rate increase, rate structure and proposed new alternative ratemaking and new surcharges will affect low-income and/or low-usage customers.
4. The OCA will review the Company's current bill discount programs, arrearage management programs, or lack thereof, and proposed changes to the programs.

H. Quality of Service

1. The OCA will review the Company's quality of service to ensure that it is providing safe, adequate, and reliable service that is consistent with the requirements of Section 1501 of the Public Utility Code.
2. The OCA will investigate the quality of service complaints by the Company's customers.

I. Customer Service

1. The OCA will review the Company's consumer protection policies and programs in order to ensure compliance with Chapter 14 of the Public Utility Code and Chapter 56 of the Commission's regulations.
2. The OCA will examine the Company's customer service, including performance trends, internal training, management oversight, policies, and programs.
3. The OCA will examine the Company's consumer education programs, particularly with regard to changes in billing and collection rights and remedies, and complaint processes. This includes consumer education materials regarding the proposed Weather Normalization Adjustment.

4. The OCA will examine the Company's compliance and reporting as required in the last rate case concerning service and service quality.
5. The OCA will examine the Company's response to the most recent Commission Management Audit.

J. Other Issues

1. The OCA will examine any relevant issues that arise as a result of the Company's operations.
2. The OCA will investigate to ensure that the Company is complying with all prior orders.
3. The OCA reserves the right to examine other issues affecting the Company's revenue requirements, rates, charges, and other tariff provisions as they are identified through discovery.

III. WITNESSES / EVIDENCE

The OCA intends to present the direct, rebuttal, and surrebuttal testimonies, as may be necessary, of the below witnesses. Each witness will present testimony in written form and will attach various exhibits, documents, and explanatory information, as may be necessary. In order to expedite the resolution of this proceeding, the OCA requests that copies of all interrogatories, testimony, and answers to interrogatories be mailed and/or emailed directly to the OCA's group email formed particularly for this proceeding. The OCA's witnesses are:

Accounting/ Revenue Requirement/
Regulatory Policy:

Jennifer Rogers
Exeter Associates, Inc.
10480 Little Patuxent Parkway
Suite 300
Columbia, MD 21044
E-Mail: OCAPikeBRC2024@paoca.org

Rate of Return:

Maureen Reno
Reno Energy Consulting Services, LLC
19 Hope Hill Road,
Derry, NH 03038
E-Mail: OCAPikeBRC2024@paoca.org

Cost of Service and Rate Design:

Karl Pavlovic
PCMG and Associates LLC
22 Brookes Ave
Gaithersburg MD 20877
E-Mail: OCAPIkeBRC2024@paoca.org

The OCA specifically reserves the right to call additional witnesses, as necessary, and retains the flexibility to have the witnesses above address other areas of this case as the case proceeds. If the OCA determines that additional witnesses will be necessary for any portion of its case, it will notify all parties of record immediately.

IV. PROPOSED SCHEDULE

The OCA continues to work with the Company and the parties on a procedural schedule that is a reasonable compromise of the parties' competing interests within the time afforded for litigation of this matter. In consultation with other parties, the OCA proposes the following schedule:

Public Input Hearings	TBD
Other Parties' Direct	Thursday, April 3, 2025
Other Parties' Supplemental Direct Testimony Regarding Public Input Hearings	TBD: May be needed depending on timing of public input hearings and other party direct testimony
Rebuttal Testimony	Thursday, May 1, 2025
Surrebuttal Testimony	Thursday, May 15, 2025
Rejoinder	Monday, May 19, 2025
Evidentiary Hearings	Wednesday, May 21, 2025*, thru Friday May 23, 2025
Main Briefs	Monday, June 9, 2025
Reply Briefs	Monday, June 23, 2025

*Hearing exhibits relating to Written Rejoinder due by 4:30 PM on Tuesday, May 20, 2025.

The OCA requests that the dates included in any litigation schedule in this matter be considered “in-hand” dates and that electronic service on the due date will satisfy the “in-hand” requirement.

V. SERVICE ON THE OCA

The OCA respectfully requests that the Presiding Officer permit electronic service without the requirement of a follow-up hard copy. The OCA will be represented in this case by the attorneys listed below:

Melanie Joy El Atieh, Deputy Consumer Advocate
Jacob Guthrie, Assistant Consumer Advocate
Ryan Morden, Assistant Consumer Advocate
Office of Consumer Advocate
555 Walnut Street, 5th Floor, Forum Place
Harrisburg, PA 17101-1923
Telephone: (717) 783-5048
Fax: (717) 783-7152
E-mail: OCAPikeBRC2024@paoca.org

The OCA has created a group e-mail address provided above. This is the only e-mail address that is required for service on the OCA. The OCA’s group e-mail address will provide the emailed materials to all members of the OCA team including the consultants listed above.

For the purposes of the Prehearing Conference, Mr. Guthrie will be the primary attorney speaking on behalf of the OCA.

VI. SETTLEMENT

The OCA is willing to participate in settlement discussions.

VII. DISCOVERY

The OCA proposes the following modifications to the Commission’s procedural rules regarding discovery. The OCA requests that the Presiding Officers direct that the modifications

will take effect when addressed during the on the record prehearing conference and apply to all future discovery requests served on and after the date of the prehearing conference February 14, 2025. The OCA also requests that any outstanding interrogatories or requests for admissions are due no later than 10 calendar days after the Prehearing Conference to the extent such responses are due later than such date, in accordance with Paragraph A below.

- A. Answers to written interrogatories and requests for document production, entry for inspection, or other purposes shall be served in-hand within ten (10) calendar days of service.
- B. Objections to interrogatories and/or requests for production shall be communicated orally to the propounding party within three (3) calendar days of service of the interrogatories; unresolved objections shall be served in writing to the propounding party within five (5) calendar days of service of the interrogatories and/or requests for production.
- C. Motions to dismiss objections and/or direct the answering of interrogatories and/or requests for production shall be filed within five (5) business days of service of written objections.
- D. Answers to motions to dismiss objections and/or answering of interrogatories and/or requests for production shall be filed within three (3) business days of service of such motions.
- E. Requests for admissions will be deemed admitted unless answered within ten (10) calendar days or objected to within five (5) calendar days of service.
- F. Answers to on-the-record data requests shall be served in-hand within five (5) calendar days of the requests.
- G. Any discovery or discovery-related pleadings (such as objections, motions, and answers to same) served after served after 4:30 p.m. Monday through Thursday or after 1:30 p.m. on a Friday or the day before a holiday will be deemed to have been served on the next business day for purposes of calculating the due date for any responsive filing.

After rebuttal is served, the OCA proposes that the deadlines should be reduced as follows:

- A. Answers to interrogatories and responses to requests for document production, entry for inspection, or other purposes shall be served within five (5) calendar days of service of the interrogatories or requests for production.

- B. Objections to interrogatories and/or requests for production shall be communicated orally to the propounding party within two (2) calendar days of service; unresolved objections shall be served on the propounding party in writing within three (3) calendar days of service of the interrogatories and/or requests for production.
- C. Motions to dismiss objections and/or direct the answering of interrogatories and/or requests for production shall be filed within three (3) business days of service of written objections.
- D. Answers to motions to dismiss objections and/or direct the answering of interrogatories and/or requests for production shall be filed within three (3) business days of service of such motions.
- E. Requests for admission shall be deemed admitted unless answered or objected to within three (3) calendar days of service.
- F. Discovery requests and discovery related pleadings (such as objections, motions, and answers to same) served after 4:30 p.m. Monday through Thursday or after 1:30 p.m. on a Friday or the day preceding a holiday shall be deemed to have been served on the next business day.

VIII. PREHEARING PROCEDURES

The OCA requests that the ALJs in their Prehearing Conference Order and Evidentiary Hearing Notice clarify that:

- A. Evidentiary hearing exhibits need not include all pre-served testimony which is circulated to the ALJs and parties in this proceeding in accordance with the above-referenced procedural schedule. However, such pre-served testimony may be identified for movement into the record at the hearing through an inventory of pre-served testimony which is provided as a hearing exhibit.
- B. Evidentiary hearing exhibits may be provided to the ALJs and parties by 10am the day before the start of evidentiary hearings with the exception of hearing exhibits related to rejoinder which may be provided by the end of the day on same day.

IX. PUBLIC INPUT HEARINGS

The OCA is aware of at least fifteen (15) informal comments/objections that have been filed with the Commission. As such, the OCA requests that one in-person public input hearing be held in the Company's service territory given the size of the proposed increase and the limited

geographical area of the service territory. Moreover, the OCA requests that two telephonic public input hearings be held to accommodate members of the public who cannot attend the in-person public input hearing.

The OCA proposes that the three requested public input hearings cover the above captioned proceeding and the Company's proposed rate increase for its gas customers (see Docket No. R-2024-3052357).

Attached as Appendix A is the OCA's proposed draft Notice for the Public Input Hearing (to be completed with details as determined by the presiding ALJs). The OCA requests the following:

- A. Given the size of the customer base and service territory, a total of three (3) Public Input Hearings be held, one in-person and two telephonic.
- B. At least one telephonic public input hearing be held in the evening.
- C. Pre-registration be either encouraged or required for telephonic hearings only, and if required, pre-registration be required by 10:00 a.m. on the day of the telephonic Public Input Hearing at which the witness seeks to testify.
- D. Hearing exhibits be required to be submitted to the ALJs by 10:00 a.m. the day before the Public Input Hearing at which the witness seeks to testify.
- E. The Commission's notice of the Public Input Hearings will include the phone numbers and access codes necessary for participants to use to fully access all telephonic Public Input Hearings.
- F. During the hearings, ALJs will request participants state whether they are an electric customer, a gas customer, or receive both gas and electric services from Pike.
- G. The Company will be required to, at a minimum, generate a notice of the Public Input Hearings that contains relevant information as to date, time, location, and phone numbers and access codes and further be required to advertise the notice: (1) in the general readership section (not legal section) of local newspapers within the service territory; (2) on its website; and (3) in social media posts which the Company utilizes to advertise generally.

H. That the other parties involved in the proceeding, including the OCA, be permitted to review these public input announcements prior to their publication and distribution and have input into which publications the ads are placed.

X. COMMON BRIEFING OUTLINE

The OCA requests that, when the ALJs issues their Instructions for Briefs, the common outline provided by the ALJs will include Roman numeral-level headers for an Overall Position on Rate Increase section following the Summary of Argument section, as well as Alternative Ratemaking, Customer Service / Quality of Service, Customer Assistance Programs, and Tariff Issues (not otherwise briefed) sections of the brief which follow Rate Structure / Rate Design and precede the Conclusion. The OCA's proposals for the common briefing outline are attached as Appendix B to this Prehearing Memorandum.

Respectfully Submitted,

/s/ Ryan Morden

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Dated: February 12, 2025

OCA APPENDIX A

NOTICE OF IN-PERSON AND TELEPHONIC PUBLIC INPUT HEARINGS

For Pike County Light & Power Company Rate Increase Requests

Docket Nos.
R-2024-3052357
R-2024-3052359

The Pennsylvania Public Utility Commission (PUC) will conduct four (4) Public Input Hearings concerning the general rate increases requests filed by Pike County Light & Power Company. On December 30, 2024, seeking to increase gas distribution rates by \$905,900 per year. On January 14, 2025 seeking to increase Electric distribution rates by \$2,143,900 per year. The in-person and telephonic hearings will be held at the following times and places:

Presiding Officers:
Administrative Law Judge Marta Guhl
Administrative Law Judge Alphonso Arnold III

IN-PERSON PUBLIC INPUT HEARINGS

Pre-registration is not required.

Date: [Here]
Time: [Here]
Location: [Here]

TELEPHONIC PUBLIC INPUT HEARINGS

Pre-registration is [encouraged/required]. Read below.

Date: [Here]
Time: [Here]

Pre-registration is [encouraged/required] by [same day] at 10AM.

Date: [Here]
Time: [Here]

Pre-registration is [encouraged/required] by [same day] at 10AM.

Toll-free Conference Number: xxx.xxx.xxxx
PIN Number: xxxxxxxx

- You must dial the toll-free Conference number above
- You must enter the PIN number above when instructed

- You must speak your name when prompted, and press #
- Then, the telephone system will connect you to the hearing

PRE-REGISTRATION FOR TELEPHONIC PUBLIC INPUT HEARINGS: To testify at the telephonic Public Input Hearings, pre-registration is [encouraged/required] by [day of the hearing] at 10AM. Failure to pre-register could result in you not being called to testify by the PUC judge. To pre-register to testify by telephone, please contact the PUC Judge's Legal Assistant, [name], by e-mail at [e-mail address] or by phone at [xxx.xxx.xxxx] and provide the requested information.

NEED ASSISTANCE WITH PRE-REGISTRATION? If you need assistance pre-registering to testify, you may have someone register for you, but they will need to provide the PUC Judge all the information listed above. Additionally, if more than one person in your household would like to testify, one person may pre-register for other individuals in the same household by providing the PUC Judge's Legal Assistant with the above-listed information for each individual.

REQUESTS FOR INTERPRETERS: If you require an interpreter, please pre-register as soon as possible. If you register too close to the hearing date, we may not have enough time to arrange for an interpreter. If you request an interpreter, the PUC will make reasonable efforts to have one present. AT&T Relay Service number for persons who are deaf or hearing-impaired: 1-800-654-5988.

HEARING EXHIBITS: If you have any hearing exhibits to which you will refer during the hearing, please e-mail them to the PUC Judge's Legal Assistant, [name], at [e-mail address]. The PUC Judge will forward your exhibits to all the parties. Exhibits for the public input hearing must be received by the PUC Judge by [the day before the hearing] at 10AM.

QUESTIONS? The Pennsylvania Office of Consumer Advocate (OCA) represents the interests of utility customers before the PUC. If you have questions about the public input hearings or the Company's requested rate increase, please contact the OCA toll free at 1-800-684-6560 or by e-mail at consumer@paoca.org. Additionally, the OCA can help customers pre-register for the Public Input Hearings.

OTHER WAYS TO BE HEARD: If you want to be heard about the proposed rate increase but do not want or cannot testify at the Public Input Hearings, you may file a formal complaint or comment to the proposed rate increase. Please visit the PUC's website to use the applicable form available at <https://www.puc.pa.gov/complaints/formal-complaints/>

OCA APPENDIX B

OCA's Proposed Common Briefing Outline For General Rate Increase Proceeding

- I. Introduction
- II. Summary of Argument
- III. Overall Position on Rate Increase
- IV. Rate Base
 - A. Plant in Service
 - B. Depreciation Reserve
 - C. Additions to Rate Base
 - D. Deductions from Rate Base
- V. Revenues
- VI. Expenses
- VII. Taxes
- VIII. Rate of Return
- IX. Rate Structure and Rate Design
 - A. Cost of Service Study
 - B. Revenue Allocation
 - C. Rate Design/ Tariff Structure
 - D. Summary and Alternatives
- X. Alternative Ratemaking
- XI. Customer Service / Quality of Service
- XII. Customer Assistance Programs
- XIII. Tariff Issues (Not Briefed Above)
- XIV. Miscellaneous Issues
- XV. Conclusion

Note: Appropriate modifications may be made. For instance, a party might add "Affiliated Interest Expenses" as a major topic heading or might brief only rate structure and not use other topic headings. A summary and alternatives should be provided under "Rate Structure" but the "Rate Base" and "Rate Structure" formats shown may be modified, as appropriate. Additional subheadings should be used, as appropriate