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February 12, 2025

VIA ELECTRONIC FILING

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

Re: Pike County Light & Power Company - Gas; Docket No. R-2024-3052357;
Pike County Light & Power Company – Electric; Docket No. R-2024-3052359;
PIKE PREHEARING CONFERENCE MEMORANDUM

Dear Secretary Chiavetta:

Enclosed for filing is Pike County Light & Power Company's Prehearing Conference Memorandum in the above-referenced proceedings.

If you have any questions regarding this filing, please contact me.

Very truly yours,

/s/ Whitney E. Snyder

Whitney E. Snyder
Erich W. Struble

Counsel for Pike County Light & Power Company

WES/das
Enclosure

cc: Honorable Marta Guhl (mguhl@pa.gov)
Honorable Alphonso Arnold III (alphonarno@pa.gov)
Pamela McNeal, Legal Assistant (pmcneal@pa.gov)
Per Certificate of Service

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Pennsylvania Public Utility Commission	:	
	:	
v.	:	Docket No. R-2024-3052357
	:	
Pike County Light & Power Company –	:	
Gas Division	:	
Pennsylvania Public Utility Commission	:	
	:	
v.	:	Docket No. R-2024-3052359
	:	
Pike County Light & Power Company –	:	
Electric Division	:	(Unconsolidated)

PREHEARING CONFERENCE MEMORANDUM

**TO THE HONORABLE MARTA GUHL AND
THE HONORABLE ALPHONSO ARNOLD III:**

Pursuant to the February 7, 2025 Prehearing Conference Order in the above-referenced proceeding, Pike County Light and Power Company (“Pike” or “PCLP” or the “Company”), by and through its attorneys in this matter, HMS Legal LLP, submits this Prehearing Conference Memorandum.

I. PROCEDURAL HISTORY

On December 30, 2024, PCLP filed Supplement No. 127 to Tariff Gas – Pa. P.U.C. No. 6 (Tariff No. 6) to become effective February 28, 2025, and docketed at R-2024-3052357 (Gas Filing). Tariff No. 6 contains proposed changes to rates calculated to produce an increase of \$905,900 (35.8%) in additional revenues.

On January 14, 2025, PCLP filed Supplement No. 105 to Tariff Electric – Pa. P.U.C. No. 8 (Tariff No. 8) to become effective March 15, 2025, and docketed at R-2024-3052359 (Electric

Filing). Tariff No. 8 contains proposed changes to rates, rules and regulations calculated to produce an increase of \$1,874,600 (11.5%) in additional revenues.

On January 8, 2025 and January 16, 2025, the Office of Consumer Advocate (“OCA”) and Office of Small Business Advocate (“OSBA”), respectively, filed Formal Complaints against PCLP regarding its Gas Filing, asserting, *inter alia*, that it is contrary to sound ratemaking principles and public policy.

On January 17, 2025, Pike voluntarily further extended the suspension period in the Gas Filing so that both cases can be litigated on the same schedule.

On January 23, 2025, the Commission, pursuant to the Public Utility Code, 66 Pa. C.S. § 1308(d), suspended the filing of Tariff No. 6 by operation of law until October 15, 2025, unless permitted by Commission Order to become effective on an earlier date. The Commission also ordered an investigation to determine the lawfulness, justness, and reasonableness of the rates, rules, and regulations contained in proposed Tariff No. 6.

On January 24, 2025, the Commission scheduled a telephonic prehearing conference in PCLP’s gas base rate proceeding for Friday, February 14, 2025 before Administrative Law Judges Marta Guhl and Alphonso Arnold III (“ALJs”).

Also on January 24, 2025, OCA and OSBA filed Formal Complaints against PCLP regarding its Electric Filing, asserting, *inter alia*, that it is contrary to sound ratemaking principles and public policy.

PCLP, OCA, and OSBA are currently engaged in discovery in both the gas and electric proceedings.

On February 6, 2025, the Commission pursuant to the Public Utility Code, 66 Pa. C.S. § 1308(d), suspended the filing of Tariff No. 105 by operation of law until October 15, 2025, unless

permitted by Commission Order to become effective on an earlier date. The Commission also ordered an investigation to determine the lawfulness, justness, and reasonableness of the rates, rules, and regulations contained in proposed Tariff No. 105.

On February 6, 2025, the Commission also assigned the Electric Filing to the ALJs and scheduled the prehearing conference for the same time and date as the Gas Filing.

On February 7, 2025, PCLP filed a Motion to Consolidate For Scheduling Purposes and sought an expedited 6-day response time such that consolidation can be decided at the February 14, 2025 prehearing conference.

II. A PROPOSED PLAN AND SCHEDULE OF DISCOVERY

The Company has already responded to a substantial amount of discovery requests from the parties.

The Company is willing to work with the other parties to reach mutual agreement on modifications to the discovery schedule. The Company is agreeable to the following discovery modifications:

Prior to Rebuttal Testimony

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 Testimony

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.

III. POSSIBILITY OF SETTLEMENT

Pike will actively seek to participate in settlement discussions with the other parties. Pike will not be utilizing the Commission's mediation process.

IV. ISSUES AND WITNESSES

Below is a list of the witnesses and the issues discussed within their testimony comprising Pike's direct case in this proceeding. Further definition of contested issues by the parties will develop within the scope of the subject matter listed below during the proceeding. Pike currently intends to offer the following witnesses to testify in the base rate proceeding on the following subject matters:

A. Gas

	Witness	Issues Covered
Statement No. 1	Gas Accounting Panel Charles Lenns, Chief Financial Officer and Vice President Matthew Lenns, Controller Pike County Light & Power Company 105 Schneider Lane, Milford, PA 18337	A) Historic financial data and Intercompany cost allocations B) Capital structure C) Rate of return D) Rate base E) Cost of Service F) Gas sales and revenues G) Rate increase H) Weather Normalization Adjustment
Statement No. 2	Gas Rate Design Paul M. Normand, President Management Applications Consulting, Inc. 1103 Rocky Drive Suite 201 Reading, PA 19609	A) Cost of Service Study B) revenue allocation and rate design C) Impact of proposed rate changes on customers' bills
Statement No. 3*	Steven Grandinali* Consultant to Pike County Light & Power Company 105 Schneider Lane, Milford, PA 18337	A) Overview of gas service and operations B) Gas capital projects C) Staffing Needs

*Pike will be substituting Mr. Grandinali as a witness for Mr. Verbraak. Pike Statement No. 3 will be adopted by Mr. Grandinali without modification. A revised version of Statement No. 3 will be recirculated with updated witness identification testimony.

B. Electric

	Witness	Issues Covered
Statement No. 1	<p>Electric Accounting Panel</p> <p>Charles Lenns, Chief Financial Officer and Vice President Matthew Lenns, Controller Pike County Light & Power Company 105 Schneider Lane, Milford, PA 18337</p>	<p>A) Historic financial data and Intercompany cost allocations B) Capital structure C) Rate of return D) Rate base E) Cost of Service F) Electric sales and revenues G) Rate increase</p>
Statement No. 2	<p>Electric Rate Design</p> <p>Paul M. Normand, President Management Applications Consulting, Inc. 1103 Rocky Drive Suite 201 Reading, PA 19609</p>	<p>A) Cost of Service Study B) revenue allocation and rate design C) Impact of proposed rate changes on customers' bills</p>
Statement No. 3	<p>Steven Grandinali*</p> <p>Consultant to Pike County Light & Power Company 105 Schneider Lane, Milford, PA 18337</p>	<p>A) Overview of Electric service and Company operations B) Electric system improvement projects and LTIP C) Vegetation management D) Advanced Metering Infrastructure E) Staffing Needs</p>

V. LITIGATION SCHEDULE

The Company is willing to work with the other parties to come to a mutually agreeable litigation schedule. The Company is agreeable to the following schedule:

Other Parties' Direct	Thursday, April 3, 2025
Other Parties' Supplemental Direct Testimony Regarding Public Input Hearings	If needed, dependent upon timing of public input hearings
Rebuttal Testimony	Thursday, May 1, 2025
Surrebuttal Testimony	Thursday, May 15, 2025
Rejoinder	Monday, May 19, 2025
Evidentiary Hearings	Wednesday, May 21, 2025* – Thursday May 23, 2025
Main Briefs	Friday, 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.

VI. HEARING LENGTH AND FORMAT

The Company believes three days is sufficient for hearings. The Company would prefer telephonic hearings, but is willing to work with the parties to reach mutual agreement regarding hearing format.

VII. PUBLIC INPUT HEARINGS

The Company is willing to work with the other parties to reach mutual agreement on dates, times, and locations for public input hearings.

VIII. IDENTIFICATION OF SPEAKER FOR PREHEARING CONFERENCE

Whitney Snyder, Esquire will be speaking at the prehearing conference on behalf of the Company.

IX. CONSOLIDATION

The Company has filed a Motion to Consolidate for Scheduling Purposes. The Company incorporates its Motion as if set forth fully herein and will be prepared to address consolidation at the prehearing conference.

Respectfully submitted,

/s/ Whitney E. Snyder

Whitney E. Snyder, Attorney ID No. 316625

Erich W. Struble, Attorney ID No. 310768

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Counsel for Pike County Light & Power Company

Dated: February 12, 2025

CERTIFICATE OF SERVICE

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

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/s/ Whitney E. Snyder
Whitney E. Snyder
Erich W. Struble

DATED: February 12, 2025