



COMMONWEALTH OF PENNSYLVANIA

May 14, 2025

E-FILED

Matthew L. Homsher, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17120

**Re: Pennsylvania Public Utility Commission v. Citizens' Electric Company of
Lewisburg, PA / Docket No. R-2025-3054394**

Dear Secretary Homsher:

Enclosed please find the Complaint, Public Statement, and Verification, 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/ Rebecca Lyttle

Rebecca Lyttle
Assistant Small Business Advocate
Attorney ID No. 201399

Enclosures

cc: Kevin Higgins
Parties of Record

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission	:	
	:	
v.	:	Docket No. R-2025-3054394
	:	
Citizens' Electric Company of Lewisburg, PA	:	

**COMPLAINT OF THE
OFFICE OF SMALL BUSINESS ADVOCATE**

1. The Complainant is:

NazAarah Sabree
Small Business Advocate
Forum Place
555 Walnut Street, 1st Floor
Harrisburg, PA 17101

2. The name and address of the attorney for the Office of Small Business Advocate (“OSBA”) is:

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

Steven C. Gray
Senior Attorney
Assistant Small Business Advocate
Office of Small Business Advocate
555 Walnut Street
Forum Place, 1st Floor
Harrisburg, PA 17101
sgray@pa.gov

3. The respondent utility is:

Citizens Electric Company
1775 Industrial Blvd.
Lewisburg, PA 17837

4. The Complainant is authorized and directed by the Small Business Advocate Act, Act 181 of 1988, 73 P.S. §§ 399.41 - 399.50, to represent the interests of small business consumers of utility services in matters before the Pennsylvania Public Utility Commission (“Commission”).

5. This Complaint is filed against the rates, terms, and other provisions of Proposed Supplement No. 172 to Tariff Electric - Pa. P.U.C. No. 14 (“Supplement No. 172”) which was filed with the Commission on April 30, 2025, Citizens’ Electric Company (“Citizens” or the “Company”). The rates set forth the Company’s April 30th filing, if approved by the Commission, would increase Citizens’ annual revenues by \$1.79 million or by 11%.

6. As set forth in Supplement No. 172, the bill for a commercial customer purchasing electricity from Citizens’ on Schedule GLP-1 with a 10 kW demand using approximately 3,650 kWh per month would increase by \$20.14 per month, from \$405.92 to \$426.5. This is approximately a 5.0% increase.

7. As set forth in Supplement No. 172, The bill for a commercial customer on Schedule GLP-3 with a billing demand of 150 kW using approximately 54,750 kWh per month would increase by \$303.32 per month, from \$5,715.48 to \$6,018.79. This is approximately a 5.3% increase.

8. After preliminary review of the materials filed by the Company in support of the proposed Tariffs, Complainant believes, and therefore avers, that those materials may be insufficient to justify the rate increase requested and that the Company’s present and proposed rates, rules, and conditions of service may be unjust, unreasonable, unduly discriminatory, and otherwise contrary to law, particularly as they pertain to Citizens’ small business customers.

9. Complainant believes, and therefore avers, that Citizens' proposed tariff changes, proposed rates, rate design, and revenue allocation are or may be unjust, unreasonable, and unlawfully discriminatory in violation of, *inter alia*, Sections 1301 and 1304 of the Public Utility Code, 66 Pa. C.S. §§1301 and 1304, and, furthermore, are contrary to appropriate public policy, sound ratemaking considerations, and may not be supported by the materials filed by the Company.

10. In view of the foregoing, the Small Business Advocate respectfully requests that the Pennsylvania Public Utility Commission:

- A. Suspend and investigate the operation of Supplement No. 172;
- B. At the conclusion of such investigation, reject the proposed new rates and other tariff changes to the extent required to make certain that Citizens' rates are lawful, just, reasonable, and not unduly discriminatory to small business customers; and
- C. Grant such other relief as may be necessary or appropriate.

Respectfully submitted,

/s/ Rebecca Lyttle

Rebecca Lyttle
Assistant Small Business Advocate
Attorney ID No. 201399

For:
NazAarah Sabree
Small Business Advocate

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

Dated: May 14, 2025

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission	:	
	:	
v.	:	Docket No. R-2025-3054394
	:	
Citizens' Electric Company of Lewisburg, PA	:	
	:	

**PUBLIC STATEMENT OF
THE OFFICE OF SMALL BUSINESS ADVOCATE**

The Small Business Advocate is authorized and directed to represent the interest of small business consumers of utility services in Pennsylvania under the provisions of the Small Business Advocate Act, Act 181 of 1988, 73 P.S. §§ 399.41 - 399.50 (“Act”). The Act further provides that the Small Business Advocate is to issue publicly a written statement stating concisely the specific interest of small business consumers to be protected by her initiation of or intervention in any proceeding involving those interests before the Public Utility Commission (“Commission”) or any other agency or court. This public statement relates to the filing today by the Small Business Advocate of a complaint against the proposed electric tariff filing of Citizens’ Electric Company (“Citizens” or the “Company”), which would increase the annual operating revenue of Citizens by \$1.7 million per year, or by 11%.

The Small Business Advocate files this formal complaint against the Company’s proposed tariff filing to protect the interests of Citizens’ small business customers. A thorough inquiry by the Commission into all elements of the Company’s proposed tariff filing is necessary

to ensure that the tariff filing is lawful, just, reasonable, and not discriminatory against Citizens' small business customers.

In view of the foregoing, the Small Business Advocate will participate in proceedings before the Public Utility Commission to investigate the reasonableness of the proposed tariff filing. The Small Business Advocate will ask the Commission to deny any proposed new rates and other tariff changes that apply to small business customers that are not proven by Citizens' to be lawful, just, reasonable, and not discriminatory against the Company's small business customers.

Dated: May 14, 2025

VERIFICATION

I, NazAarah Sabree, hereby state that the facts set forth herein above are true and correct to the best of my knowledge, information and belief and that I expect to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa. C.S. § 4904 (relating to unsworn falsification to authorities).

Date: May 14, 2025



(Signature)

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission	:	
	:	
v.	:	Docket No. R-2025-3054394
	:	
Citizens' Electric Company of Lewisburg, PA	:	

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 Charles E. Rainey, Jr.
Chief Administrative Law Judge
Pennsylvania Public Utility Commission
400 North Street
Commonwealth Keystone Building
Harrisburg, PA 17120
crainey@pa.gov

Allison Kaster, Esquire
Director
Bureau of Investigation & Enforcement
400 North Street
Commonwealth Keystone Building
Harrisburg, PA 17120
akaster@pa.gov

Melanie Joy El Atieh, Esquire
Ryan Morden, Esquire
Barrett C. Sheridan, Esquire
PA Office of Consumer Advocate
Forum Place
555 Walnut Street, 5th Floor
Harrisburg, PA 17101-1923
MElAtieh@paoca.org
RMorden@paoca.org
BSheridan@paoca.org

Adeolu A. Bakare, Esquire
McNees Wallace & Nurick LLC
100 Pine Street
P.O. Box 1166
Harrisburg, PA 17108-1166
abakare@mcneeslaw.com

Date: May 14, 2025

/s/ Rebecca Lyttle

Rebecca Lyttle
Assistant Small Business Advocate
Attorney ID No. 201399