



Todd S. Stewart  
717.703.0806  
[tsstewart@hmslegal.com](mailto:tsstewart@hmslegal.com)

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501 Corporate Circle, Suite 302, Harrisburg, PA 17110 Phone: 717.236.1300 Fax: 717.236.4841 [www.hmslegal.com](http://www.hmslegal.com)

May 21, 2025

**VIA ELECTRONIC FILING**

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; **PETITION TO INTERVENE OF KELLY ROAD SOLAR, LLC, LANCASTER AVENUE SOLAR, LLC, AND TWILIGHT RENEWABLES, LLC**

Dear Secretary Homsher:

Enclosed for filing with the Commission is the Petition to Intervene of Kelly Road Solar, LLC, Lancaster Avenue Solar, LLC, and Twilight Renewables, LLC (collectively "Solar Projects") in the above-captioned docket. Copies of this Petition have been served in accordance with the attached Certificate of Service.

Thank you for your attention to this matter. If you have any questions regarding this filing, please do not hesitate to contact my office.

Very truly yours,

A handwritten signature in blue ink, appearing to read "T. Stewart", is written over a large, stylized blue scribble that extends across the signature line.

Todd S. Stewart  
*Counsel for Kelly Road Solar, LLC and  
Twilight Renewables, LLC (collectively  
"Solar Projects")*

TSS/jld

Enclosure

cc: Per Certificate of Service

**CERTIFICATE OF SERVICE**

I hereby certify that I have this day served a true 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).

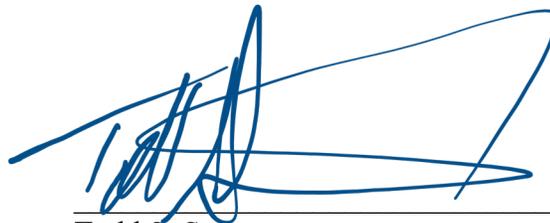
**VIA ELECTRONIC MAIL**

Adeolu A. Bakare, Esquire  
McNees Wallace Nurick LLC  
100 Pine Street  
P.O. Box 1166  
Harrisburg, PA 17108-1166  
[abakare@mcneeslaw.com](mailto:abakare@mcneeslaw.com)  
*Counsel for Citizens' Electric Company of  
Lewisburg, PA*

Steven C. Gray, Esquire  
Rebecca Lyttle, Esquire  
Office of Small Business Advocate  
555 Walnut Street  
1<sup>st</sup> Floor, Forum Place  
Harrisburg, PA 17101  
[sgray@pa.gov](mailto:sgray@pa.gov)  
[relyttle@pa.gov](mailto:relyttle@pa.gov)

Michael A. Podskoch, Jr., Esquire  
Pennsylvania Public Utility Commission  
Bureau of Investigation & Enforcement  
Commonwealth Keystone Building  
400 North Street  
Harrisburg, PA 17120  
[mpodskoch@pa.gov](mailto:mpodskoch@pa.gov)

Melanie Joy El Atieh, Esquire  
Ryan Morden, Esquire  
Barrett C. Sheridan  
Office of Consumer Advocate  
555 Walnut Street  
5<sup>th</sup> Floor, Forum Place  
Harrisburg, PA 17101-1923  
[MElAtieh@paoca.org](mailto:MElAtieh@paoca.org)  
[RMorden@paoca.org](mailto:RMorden@paoca.org)  
[BSheridan@paoca.org](mailto:BSheridan@paoca.org)



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Todd S. Stewart

DATED: May 21, 2025



3. Kelly Road Solar, LLC is the sole owner of a solar photovoltaic project that has been submitted to Citizens for approval as a net metered customer generator. Kelly Road Solar, LLC is wholly owned by Brett Nolt. Lancaster Avenue Solar, LLC owns an operating solar photovoltaic net metered project in the Citizen's service territory, and Twilight Renewables, LLC is a developer of renewable energy projects and is the developer of the Kelly Road Solar, LLC project in Citizens' territory, as well as the developer of the Lancaster Avenue Solar, LLC, Project. Twilight Renewables, LLC also is owned 100% by Brett Nolt.

4. Citizens' filing, among other things proposed to change definition of demand to include both generation and load, and to increase the demand charge for generation by nearly 1000%.

5. Citizens' tariff will also reduce the expected compensation for the Kelly Road Solar, LLC project due to the re-definition of the Peak Demand to include generation in addition to peak load, which has always been the definition of Peak Demand. The change in definition will change the procurement class of the Kelly Road Solar, LLC project to compensation for excess generation under a real-time-pricing mechanism.

6. Solar Projects believes that the changes proposed by Citizens in its rate filing are contrary to the express requirements of the Alternative Energy Portfolio Standards Act, 73 P.S. § 1648.5, which requires that customer generators be compensated at full retail value, and a violation of Sections 2807(e)(7) and 2807(f)(5) of the Public Utility Code as well as section 54.188(i) of the Commission's regulations.

7. No other party to this proceeding can represent the interests of the Solar Projects and it is clear that they have a substantial interest in the outcome of this proceeding and will be greatly harmed if the rate case were approved as filed.

8. Accordingly, Petitioners' Kelly Road Solar, LLC, Lancaster Avenue Solar, LLC and Twilight Renewables, LLC submit that they meet the requirements of 52 Pa. Code § 5.72, as they will be bound by the Commission's action in this proceeding and their interests cannot be adequately represented by any other party, and request that their intervention be granted and that they be granted full party status in this matter.

WHEREFORE, Kelly Road Solar, LLC, Lancaster Avenue Solar, LLC and Twilight Renewables, LLC respectfully request that the Presiding Administrative Law Judge and Commission grant their Petition to Intervene in the above-captioned matter and provide them will full party status in this proceeding.

Respectfully submitted,



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Todd S. Stewart, Attorney I.D. No. 75556  
HMS Legal LLP  
501 Corporate Circle, Suite 302  
Harrisburg, PA 17110  
Phone: (717) 236-1300  
Fax: (717) 236-4841  
[tsstewart@hmslegal.com](mailto:tsstewart@hmslegal.com)

*Counsel for Kelly Road Solar, LLC,  
Lancaster Avenue Solar, LLC and Twilight  
Renewables, LLC (collectively "Solar  
Projects")*

DATED: May 21, 2025

## VERIFICATION

I, **Brett Nolt**, CEO, **Twilight Renewables**, hereby state that the facts set forth in the foregoing documents 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: 05/21/2025

Signature: \_\_\_\_\_

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