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May 23, 2025

VIA ELECTRONIC FILING

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

Re: Pennsylvania Public Utility Commission v. Pike County Light & Power Company
- Gas; Docket No. R-2024-3052357; **JOINT STIPULATION FOR
ADMISSION OF PRE-SERVED TESTIMONY AND EXHIBITS INTO THE
EVIDENTIARY RECORD**

Dear Secretary Homsher:

Enclosed for filing is Joint Stipulation for Admission of Pre-Served Testimony and Exhibits into the Evidentiary Record in the above-referenced proceeding.

If you have any questions, please contact me.

Very truly yours,

/s/ Whitney E. Snyder

Whitney E. Snyder
Erich W. Struble

Counsel for Pike County Light & Power Company

WES/jld
Enclosures

cc: Administrative Law Judge Marta Guhl (mguhl@pa.gov)
Administrative Law Judge 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) :

**JOINT STIPULATION FOR ADMISSION
OF PRE-SERVED TESTIMONY AND EXHIBITS INTO THE EVIDENTIARY RECORD**

**TO: ADMINISTRATIVE LAW JUDGE MARTA GUHL AND
ADMINISTRATIVE LAW JUDGE ALPHONSO ARNOLD III:**

This Joint Stipulation for Admission of Pre-Served Testimony and Exhibits into the Evidentiary Record at consolidated Docket Nos. R-2024-3052359 and R-2024-3052357 (“Joint Stipulation”) is entered into by Pike County Light & Power Company (“PCLP”); the Bureau of Investigation & Enforcement (“I&E”); the Office of Consumer Advocate (“OCA”); and the Office of Small Business Advocate (“OSBA”) (collectively “Joint Petitioners”). Joint Petitioners respectfully request that Administrative Law Judge Marta Guhl (“ALJ Guhl”) and Administrative Law Judge Alphonso Arnold III (“ALJ Arnold”) admit into the evidentiary record of this proceeding the previously served written testimony and exhibits prepared by PCLP, I&E, OCA, and OSBA.

- Section C includes a list of evidence the Stipulation requests be admitted.
- Appendix A contains a proposed Order Granting Joint Stipulation and Admitting Evidence.

A. PROCEDURAL HISTORY

1. 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, rules and regulations calculated to produce an increase of \$905,900 (35.8%) in additional revenues.

2. PCLP's Tariff Supplement filing contained the information required by the Commission's regulations, including direct testimony and exhibits.

3. On January 8, 2025, the Office of Consumer Advocate filed a Notice of Appearance.

4. Also on January 8, 2025, OCA filed a Formal Complaint against PCLP regarding its Gas Filing, asserting, inter alia, that it is contrary to sound ratemaking principles and public policy.

5. On January 10, 2025, the Office of Small Business Advocate and the Bureau of Investigation and Enforcement filed Notices of Appearances.

6. On January 16, 2025, the Office of Small Business Advocate filed a Formal Complaint.

7. On January 17, 2025, Pike County Light & Power Company filed Supplement No. 128 to Gas PA PUC No. 6 voluntarily suspending the effective date of the rate increase to March 15, 2025.

8. On January 23, 2025, the Commission pursuant to the Public Utility Code, 66 Pa. C.S. § 1308(d), suspended the filing of Tariff No. 127 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 Tariff No. 127.

9. Also on January 23, 2025, the Commission assigned the Gas Filing to ALJ Guhl and ALJ Arnold and scheduled the instant matters for a prehearing conference on February 14, 2025.

10. On February 5, 2025, the Presiding Officers issued a Prehearing Conference Order.

11. On February 7, 2025, PCLP filed Supplement No. 129 to Gas PA PUC No. 6 postponing the effective date of the rate increase to October 15, 2025.

12. At the Prehearing Conference, the following parties were present and represented by the following counsel: Whitney E. Snyder, Esquire, and Erich W. Struble, Esquire for PCLP, Jacob D. Guthrie, Esquire, and Ryan Morden, Esquire for OCA, Michael A. Podskoch, Jr., Esquire, for I&E, and Steven Gray, Esquire, for OSBA.

13. Deborah Rutt, a consumer complaint, was also present at the Prehearing Conference.

14. On February 26, 2025, a Notice of Public Input Hearings was issued scheduling In-Person Hearings for March 18, 2025, and Telephonic Hearings for March 19, 2025. Also on February 26, 2025, ALJ Guhl and ALJ Arnold issued a Prehearing Order setting the litigation schedule, dates for evidentiary hearings, and discovery deadlines.

15. The February 26, 2025, Order consolidated the gas and electric dockets as well as all complaint dockets for the purposes of the procedural schedule and any hearings.

16. On March 6, 2025, the Commission issued a Secretarial Letter regarding ex parte communication from Senator Baker and Representative Olsommer.

17. Also on March 26, 2025, the Commission issued a Telephonic Evidentiary Hearings Notice scheduling these matters for Call-In Hearings on May 21-23, 2025.

18. On April 3, 2025, the Bureau of Investigation & Enforcement, the Office of Small Business Advocate and the Office of Consumer Advocate served their respective Direct Testimony and Exhibits.

19. On May 1, 2025, the Office of Small Business Advocate, the Office of Consumer Advocate and PCLP served their respective Rebuttal Testimony and Exhibits.

20. On May 15, 2025, the Office of Consumer Advocate and Bureau of Investigation & Enforcement served their respective Surrebuttal Testimony and Exhibits.

21. On May 19, 2025, PCLP served Rejoinder Testimony.

22. On May 19, 2025, the Joint Petitioners notified the Presiding Officers that a non-unanimous full settlement of rate proceeding had been reached, each Joint Petitioner had waived cross examination, and the Joint Petitioners sought to enter the pre-served testimony and evidence into the record via written stipulation and requested the hearings be cancelled.

23. On May 20, 2025, the Presiding Officers issued a hearing cancellation notice cancelling the evidentiary hearings.

24. On May 20, 2025, the Presiding Officers indicated this Joint Stipulation must be filed no later than May 23, 2025.

B. STIPULATION

NOW, THEREFORE, desiring to enter into this Joint Stipulation and intending to be bound hereby, the Joint Petitioners agree, stipulate to the following, and respectfully request:

1. That, upon the issuance of a separate Order by ALJ Guhl and ALJ Arnold, the Pre-Served Testimony and Exhibits, as described in Section C below, shall be made a part of the official evidentiary record of this proceeding and may be used for all proper and legal purposes as if hearings had been conducted in this matter.

2. That cross-examination is waived with respect to all the witnesses of the Joint Petitioners.

3. Copies of the testimony and exhibits will be filed electronically with the Commission pursuant to Section 5.412a of the Commission's regulations. 52 Pa. Code § 5.412a.

C. LIST OF EVIDENCE TO BE ADMITTED

Joint Petitioners stipulate to the admission of the following into the evidentiary record:

Pike County Light & Power Company:

Direct Testimony

A. PCLP Statement No. 1 – Direct Testimony of Paul M. Normand, including Exhibit Nos. G-6, G-7 and G-8.

- B. PCLP Statement No. 2 – Direct Testimony of Accounting Panel (Charles Lenns and Matthew Lenns), including Exhibit Nos. G-1, G-2, G-3, EG4, G-5 and Verification of Customer Notice, Notice of Proposed Gas Rate Changes and Public Notice Gas Rates.
- C. PCLP Statement No. 3 – Direct Testimony of Ed Verbraak (adopted by Nancy Karlovich)
- D. Responses to Standard Data Requests.

Rebuttal Testimony

- A. PCLP Statement No. 1-R – Rebuttal Testimony of Paul M. Normand, including Exhibit R - A.
- B. PCLP Statement No. 2-R – Rebuttal Testimony of Accounting Panel (Charles Lenns and Matthew Lenns), including Pike AP-G Update (Schedule Nos. 1-12) and Exhibits AP-1R and AP-2R.
- C. PCLP Statement No. 3-R – Direct Testimony of Nancy Karlovich.
- D. PCLP Statement No. 4-R – Rebuttal Testimony of Christopher M. Wall, Principal, The Brattle Group, including Exhibit Nos. CMW-1R, CMW-2R, CMW-3R, CMW-4R, CMW-5R, CMW-6R, CMW-7R, CMW-8R, CMW-9R, CMW-10R, CMW-11R and CMW-12R.
- E. PCLP Statement No. 5-R – Rebuttal Testimony of Charlene Faulk.

Rejoinder

- A. PCLP Statement No. 3-RJ – Rejoinder Testimony of Nancy Karlovich.

Bureau of Investigation and Enforcement Testimony and Exhibits:

Direct Testimony

- A. I&E Statement No. 1 – Direct Testimony of Zachari Walker, including I&E Exhibit No. 1
- B. I&E Statement No. 2 – Direct Testimony of Christopher Keller, including I&E Exhibit No. 2
- C. I&E Statement No. 3 – Direct Testimony of Ethan H. Cline, including I&E Exhibit No. 3
- D. I&E Statement No. 4 – Direct Testimony of Andrew W. Hiorth, including I&E Exhibit No. 4

Surrebuttal Testimony

- A. I&E Statement No. 3-SR – Surrebuttal Testimony of Ethan H. Cline.

The Office of Consumer Advocate Testimony and Exhibits:

Direct Testimony

- A. OCA Statement 1 - Direct Testimony of Jennifer L. Rogers consisting of 19 pages of testimony, Appendix A, and Schedules JLR-1 through JLR-16 along with a signed verification of Jennifer L. Rogers.
- B. OCA Statement 2 - Direct Testimony of Maureen L. Reno consisting of 55 pages of testimony, Appendix A, and Exhibits MLR-1 through MLR-6 along with a signed verification of Maureen L. Reno.
- C. OCA Statement 3 - Direct Testimony of Karl R. Pavlovic consisting of 30 pages of testimony and Exhibits KRP-1 through KRP-4 along with a signed verification of Karl R. Pavlovic.

Rebuttal Testimony

- A. OCA Statement 3R - Rebuttal Testimony of Karl R. Pavlovic consisting of 9 pages of testimony and Exhibit KRP-1R along with a signed verification of Karl R. Pavlovic.

Surrebuttal Testimony

- A. OCA Statement 3SR - Surrebuttal Testimony of Karl R. Pavlovic consisting of 14 pages of testimony along with a signed verification of Karl R. Pavlovic.

Office of Small Business Advocate Testimony and Exhibits:

Direct Testimony

- A. Direct Testimony of Mark D. Ewen, labelled OSBA Statement No. 1, with Exhibit IEc-1 and Exhibit IEc-2, with signed Verification of Mark D. Ewen.

Rebuttal Testimony

- A. Rebuttal Testimony of Mark D. Ewen, labelled OSBA Statement No. 1-R, with signed Verification of Mark D. Ewen.

By their signatures below, the Joint Petitioners agree to the terms of this Joint Stipulation and represent that they are authorized to execute this Joint Stipulation on behalf of their respective clients/offices.

Respectfully submitted,



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*Counsel for the Bureau of Investigation and
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(Dated) May 23, 2025

/s/Jacob Guthrie

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*Counsel for the Office of Small Business
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Appendix A

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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

**ORDER GRANTING JOINT STIPULATION AND
ADMITTING EVIDENCE**

On May 23, 2025, a Joint Stipulation for Admission of Evidence (“Joint Stipulation”) was filed by Pike County Light & Power Company (“PCLP”), the Bureau of Investigation & Enforcement (“I&E”); the Office of Consumer Advocate (“OCA”); and the Office of Small Business Advocate (“OSBA”) (collectively referred to as the "Joint Petitioners"). Each of the Joint Petitioners stipulated to the authenticity of the filings, statements, and exhibits listed in the Joint Stipulation and requested that they be admitted into the record of this proceeding on the terms and conditions set forth in the Joint Stipulation.

As this request is reasonable, it will be granted:

THEREFORE, IT IS ORDERED THAT:

1. The following testimony and exhibits are admitted into the record:

Pike County Light & Power Company:

Direct Testimony

- A. PCLP Statement No. 1 – Direct Testimony of Paul M. Normand, including Exhibit Nos. G-6, G-7 and G-8.
- B. PCLP Statement No. 2 – Direct Testimony of Accounting Panel (Charles Lenns and Matthew Lenns), including Exhibit Nos. G-1, G-2, G-3, EG4, G-5 and Verification of Customer Notice, Notice of Proposed Gas Rate Changes and Public Notice Gas Rates.
- C. PCLP Statement No. 3 – Direct Testimony of Ed Verbraak (adopted by Nancy Karlovich)
- D. Responses to Standard Data Requests.

Rebuttal Testimony

- A. PCLP Statement No. 1-R – Rebuttal Testimony of Paul M. Normand, including Exhibit R - A.
- B. PCLP Statement No. 2-R – Rebuttal Testimony of Accounting Panel (Charles Lenns and Matthew Lenns), including Pike AP-G Update (Schedule Nos. 1-12) and Exhibits AP-1R and AP-2R.
- C. PCLP Statement No. 3-R – Direct Testimony of Nancy Karlovich.
- D. PCLP Statement No. 4-R – Rebuttal Testimony of Christopher M. Wall, Principal, The Brattle Group, including Exhibit Nos. CMW-1R, CMW-2R, CMW-3R, CMW-4R, CMW-5R, CMW-6R, CMW-7R, CMW-8R, CMW-9R, CMW-10R, CMW-11R and CMW-12R.
- E. PCLP Statement No. 5-R – Rebuttal Testimony of Charlene Faulk.

Rejoinder

- A. PCLP Statement No. 3-RJ – Rejoinder Testimony of Nancy Karlovich.

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- C. OCA Statement 3 - Direct Testimony of Karl R. Pavlovic consisting of

30 pages of testimony and Exhibits KRP-1 through KRP-4 along with a signed verification of Karl R. Pavlovic.

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- A. OCA Statement 3R - Rebuttal Testimony of Karl R. Pavlovic consisting of 9 pages of testimony and Exhibit KRP-1R along with a signed verification of Karl R. Pavlovic.

Surrebuttal Testimony

- A. OCA Statement 3SR - Surrebuttal Testimony of Karl R. Pavlovic consisting of 14 pages of testimony along with a signed verification of Karl R. Pavlovic.

Office of Small Business Advocate Testimony and Exhibits:

Direct Testimony

- A. Direct Testimony of Mark D. Ewen, labelled OSBA Statement No. 1, with Exhibit IEc-1 and Exhibit IEc-2, with signed Verification of Mark D. Ewen.

Rebuttal Testimony

- A. Rebuttal Testimony of Mark D. Ewen, labelled OSBA Statement No. 1-R, with signed Verification of Mark D. Ewen.
2. The Parties are directed to file copies of the testimony and exhibits, including the accompanying verifications, electronically with the Commission pursuant to Section 5.412a of the Commission's regulations. 52 Pa. Code § 5.412a.

Date: _____

The Hon. Administrative Law Judge
Marta Guhl

Date: _____

The Hon. Administrative Law Judge
Alphonso Arnold III

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).

VIA ELECTRONIC MAIL ONLY

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Erich W. Struble

DATED: May 23, 2025