



COMMONWEALTH OF PENNSYLVANIA

June 2, 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. Wellsboro Electric Company /  
Docket No. R-2025-3054392**

Dear Secretary Homsher:

Enclosed for filing please find the Prehearing Memorandum, 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  
Rebecca Forbes  
Parties of Record



## **II. FILING BACKGROUND**

On April 30, 2025, Wellsboro Electric Company (“Wellsboro” or the “Company”) filed Proposed Supplement No. 162 to Tariff Electric - Pa. P.U.C. No. 8 (“Supplement No. 162”) with the Commission. The rates set forth in Supplement No. 162, if approved by the Commission, would increase Wellsboro’s annual revenues by \$2.9 million or by 22%.

The OSBA filed a Complaint on May 14, 2025.

## **III. IDENTIFICATION OF WITNESS AND TENTATIVE ISSUES**

Assisting in the development and presentation of the OSBA’s case in this proceeding will be:

Kevin C. Higgins  
Principal, Energy Strategies  
111 East Broadway, Suite 1200  
Salt Lake City, UT 84111  
[khiggins@energystrat.com](mailto:khiggins@energystrat.com)

Rebecca Forbes  
Consultant, Energy Strategies  
111 East Broadway, Suite 1200  
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[RForbes@energystrat.com](mailto:RForbes@energystrat.com)

The OSBA will participate in this proceeding to assure that the interests of small business customers are adequately represented and protected.

After an initial review of the materials submitted by Wellsboro, the OSBA has identified the following list of issues that it will evaluate in this proceeding:

- (1) Whether Wellsboro’s proposed return on equity is reasonable and appropriate.
- (2) Whether Wellsboro’s proposed class cost of service study reasonably reflects cost causation, past practice, and Commission precedent.
- (3) Whether Wellsboro’s revenue allocation proposal reasonably reflects a proper class cost of service study, rate gradualism, and other established rate design principles.

(4) Whether Wellsboro's proposed rate design for the Company's small business customers is consistent with allocated costs and other established rate design principles.

(5) Whether Wellsboro's proposed revenue requirement increase of \$2.9 million is just and reasonable.

The OSBA reserves the right to pursue additional issues that may arise throughout this proceeding.

#### **IV. SERVICE OF DOCUMENTS**

In accordance with 52 Pa. Code § 1.54(b)(3)(i), the OSBA agrees to accept electronic mail delivery of documents on the due date<sup>1</sup> as satisfying the in-hand requirement.

**The OSBA requests that email delivery of documents also be provided to its witnesses identified above.**

In addition to email copies of pleadings, briefs, and exceptions, the OSBA requests email copies of responses to discovery propounded by the OSBA or any other party.

#### **V. DISCOVERY**

The OSBA does not propose any discovery modifications.

#### **VI. SETTLEMENT**

The OSBA notes its willingness to enter settlement discussions at the appropriate phase of this proceeding.

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<sup>1</sup> In accordance with 52 Pa. Code § 1.56(a)(5), documents must be received by 4:30 pm.

**VII. HEARING AND BRIEFING SCHEDULE**

At the time of this writing, the parties are discussing a proposed procedural schedule.

Respectfully submitted,

*/s/ Rebecca Lyttle* \_\_\_\_\_

Rebecca Lyttle

Assistant Small Business Advocate

Attorney ID No. 201399

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

Dated: June 2, 2025

