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June 2, 2025

VIA ELECTRONIC FILING

Matthew L. Homsher, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor
Harrisburg, PA 17120

RE: *Pa. PUC v. Citizens' Electric Company of Lewisburg, PA*
Docket No. R-2025-3054394

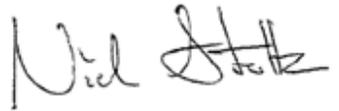
Dear Secretary Homsher:

Enclosed for filing with the Pennsylvania Public Utility Commission is the Joint Petition to Intervene ("Petition") of the Solar Energy Industries Association ("SEIA") and the Coalition for Community Solar Access ("CCSA") (collectively, the "Joint Solar Advocates") in the above-referenced proceeding. Copies of this Petition are being served in accordance with the enclosed Certificate of Service.

If you have any questions, please feel free to contact me.

Very truly yours,

STEVENS & LEE



Nicholas A. Stobbe

Enc.

Cc: Certificate of Service
The Honorable Mary D. Long

Allentown • Bergen County • Bala Cynwyd • Fort Lauderdale • Harrisburg • Lancaster • New York
Philadelphia • Princeton • Reading • Rochester • Scranton • Valley Forge • Wilkes-Barre • Wilmington
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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

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June 2, 2025

A handwritten signature in black ink, appearing to read "Nick Stobbe", is written over a horizontal line. The signature is cursive and somewhat stylized.

Nicholas A. Stobbe, Esq

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

| | | |
|---|---|----------------------------|
| Pennsylvania Public Utility Commission, | : | |
| | : | |
| v. | : | Docket Nos. R-2025-3054392 |
| | : | |
| Wellsboro Electric Company | : | R-2025-3054394 |
| and | : | |
| Citizens' Electric Company of | : | |
| Lewisburg, PA | : | |
| | : | |

**JOINT PETITION TO INTERVENE OF SOLAR ENERGY INDUSTRIES ASSOCIATION
AND COALITION FOR COMMUNITY SOLAR ACCESS**

AND NOW COME, the Solar Energy Industries Association (“SEIA”) and Coalition for Community Solar Access (“CCSA”) (collectively, the “Joint Solar Advocates”), by and through their counsel, pursuant to 52 Pa. Code § 5.71. *et. seq.*, and file this Joint Petition to Intervene in the above-captioned proceeding before the Pennsylvania Public Utility Commission (“Commission”). In support of this Petition, the Joint Solar Advocates aver as follows:

1. On or about April 30, 2025, Citizens’ Electric Company of Lewisburg, PA (“Citizens”) filed Supplement No. 172 to Tariff Electric – Pa. P.U.C. No. 14 with the Commission.
2. On or about April 30, 2025, Wellsboro Electric Company (“Wellsboro”) filed Supplement No. 162 to Tariff Electric Pa. P.U.C. No. 8 with the Commission.
3. The Joint Solar Advocates are represented in the above-captioned matter by the following counsel:

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Nicholas A. Stobbe, Esq.
Attorney I.D. 329583
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(Pro Hac Vice forthcoming)

4. SEIA is the national trade association for the United States solar industry. SEIA works to support solar by expanding markets, reducing costs, increasing reliability, removing market barriers, and providing education on the benefits of solar energy and energy storage. SEIA works with its 1,000 member companies and other strategic partners to advocate for policies to promote the aforementioned goals. SEIA's member companies include manufacturers, residential, community solar, commercial, and utility-scale solar developers, installers, construction firms, investment firms, and service providers. SEIA has over 30 member companies located in Pennsylvania, with several more national firms also conducting business in the state.

5. CCSA is national trade association that represents over 120 community solar companies, businesses and non-profits. Its mission is to expand customer choice and access to solar energy through community solar initiatives.

6. The Commission's regulations allow intervention where a person has an interest in the proceeding which may be directly affected and which is not adequately represented by existing

parties, and as to which the person may be bound by the action of the Commission in the proceeding. 52 Pa. Code § 5.72(a)(2). Intervention is also permitted where participation of person may be in the public interest. 52 Pa. Code § 5.72(a)(3). A “person” includes a corporation and an association. 52 Pa. Code § 1.8. 6.

7. The Joint Solar Advocates meet the standards for intervention set forth in 52 Pa. Code § 5.72(a). As organizations whose members include renewable energy developers, installers, and investors, SEIA and CCSA have interests that will be directly affected by this proceeding.

8. The ability of the Joint Solar Advocates’ members to develop and install renewable energy projects in the Citizens and Wellsboro service territories will be specifically and substantially affected by the outcome of this proceeding.

9. The Joint Solar Advocates’ interests in this proceeding are unique from and not adequately represented by other parties that may seek to intervene, including individual solar developers or other organizations interested in renewable energy generation in Pennsylvania in general, and in the Citizens and Wellsboro service territories in particular. This is because SEIA and CCSA represent the interests of a diverse and broad group of companies in general, and not the interests of any individual member.

10. Both Citizens’ and Wellsboro’s base rate filings propose tariff revisions to change the distribution rate classification of a targeted category of customer, i.e., customer generators.

11. Citizens’ base rate filing, among other things, proposes to clarify “how customers with smaller on-site generation resources will be placed on distribution rate schedules and billed for service.” *See* Citizens’ St. No. 4, p. 16.

12. Furthermore, Citizens proposes a tariff change that would use the net power flow from or onto its distribution system as a way of categorizing customer generators into either the Generation Supply Service Rate (“GSSR”) 1 or GSSR-2 rate schedules.

13. Similarly, Wellsboro proposes to add a new definition of Billing Demand, which will be “the greater of Gross Generator Rating (kW(AC)) as stated in the generator interconnection application or the maximum demand of the customer during any 15-minute period during the current month,” and to use this new concept to categorize customers generators into either the GSSR-1 or GSSR-2 rate schedules. *See* Wellsboro’s St. No. 4, p. 22

14. If approved, Citizens’ and Wellsboro’s revised tariffed rate classifications will substantially reduce the compensation that renewable energy customer generators receive for excess generation, which would dramatically impact the feasibility of investing in and developing renewable energy projects in Citizens’ and Wellsboro’s territories.

15. Moreover, if approved, the revised tariffs would likely substantially increase the demand charges paid by customer-generators.

16. After review of the Citizens and Wellsboro base rate filings, the Joint Solar Advocates believe that certain of the proposed changes: (1) may be in contravention of the Alternative Energy Portfolio Standards (“AEPS”) Act, *see* 73 P.S. §§ 1648.1 – 1648.8 and 66 Pa.C.S. § 2814; (2) may violate certain requirements of the Public Utility Code and the Commission’s regulations; and (3) are unjust, unreasonable, and not in the public interest.

17. The Joint Solar Advocates’ members will be bound by the action of the Commission in this proceeding, which will determine whether Citizens’ and Wellsboro’s proposed rate re-classifications go into effect.

18. Both SEIA and CCSA have a cognizable interest in ensuring that renewable energy customer generators and developers in the Commonwealth of Pennsylvania are treated fairly by public utilities like Citizens and Wellsboro, and in conformance with the Alternative Energy Portfolio Standards (“AEPS”) Act. *See* 73 P.S. §§ 1648.1 – 1648.8 and 66 Pa.C.S. § 2814.

19. The Joint Solar Advocates’ intervention is in the public interest, as their participation will enable them to contribute the unique perspectives and insights of trade associations representing solar developers, prospective customer generators, renewable energy investors, and other parties who have a vested interest in the ability build and operate renewable energy projects in every Electric Distribution Company (“EDC”) territory throughout the Commonwealth. Accordingly, the Joint Solar Advocates’ participation will aid in a comprehensive presentation of issues to be addressed in this proceeding.

20. The Joint Solar Advocates are reviewing Citizens’ and Wellsboro’s filings and will be identifying the specific issues to be addressed in this proceeding. Due to the early stage of this proceeding, the Joint Solar Advocates reserve the right to raise and address issues identified through continued review and analysis of Citizens’ and Wellsboro’s filings (and related information), as well as issues raised by other parties.

21. For the reasons set forth above, the Joint Solar Advocates submit that they both meet the requirements of 52 Pa. Code § 5.72, as they and their members will be governed by the Commission’s action in this proceeding, and they and their members’ interests are not currently and cannot be represented by any other party. As such, the Joint Solar Advocates respectfully request that their intervention be granted and that they be afforded full active party status in this proceeding.

WHEREFORE, the Joint Solar Advocates respectfully request that Presiding Administrative Law Judge, Mary D. Long, and the Pennsylvania Public Utility Commission grant their Joint Petition to Intervene in the above-captioned matter and afford the Joint Solar Advocates full active party status throughout the pendency of this proceeding.



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(*Pro Hac Vice forthcoming*)

Dated: June 2, 2025

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission, :

v. :

Wellsboro Electric Company, :
and :
Citizens' Electric Company of :
Lewisburg, PA :

Docket Nos. R-2025-3054392

R-2025-3054394

VERIFICATION

I, Leah Meredith, holding the position of Mid-Atlantic Director with the Solar Energy Industries Association verify that the factual allegations contained in the foregoing Petition to Intervene are true and correct to the best of my knowledge, information, and belief. I understand that false statements herein are made subject to the penalties of 18 Pa. C.S. §4904, relating to unsworn falsifications to authorities.



Date: June 1, 2025

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

| | | |
|---|---|----------------------------|
| Pennsylvania Public Utility Commission, | : | |
| | : | |
| v. | : | Docket Nos. R-2025-3054392 |
| | : | |
| Wellsboro Electric Company, | : | R-2025-3054394 |
| and | : | |
| Citizens' Electric Company of | : | |
| Lewisburg, PA | : | |
| | : | |

VERIFICATION

I, Matthew Hargarten, holding the position of Vice President of Government Affairs with the Coalition for Community Solar Access verify that the factual allegations contained in the foregoing Petition to Intervene are true and correct to the best of my knowledge, information, and belief. I understand that false statements herein are made subject to the penalties of 18 Pa. C.S. §4904, relating to unsworn falsifications to authorities.



Date: June 2, 2025