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June 2, 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; **PREHEARING CONFERENCE
MEMORANDUM**

Dear Secretary Homsher:

Enclosed for filing with the Pennsylvania Public Utility Commission is the Prehearing Conference Memorandum of Kelly Road Solar, LLC, Lancaster Avenue Solar, LLC, and Twilight Renewables, LLC (collectively "Solar Projects") in the above-referenced matter. A copy of this Memorandum has been served as indicated on the attached Certificate of Service.

Thank you for your attention to this matter. If you have any questions related to 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,
Lancaster Avenue Solar, LLC, and Twilight
Renewables, LLC (collectively "Solar
Projects")*

TSS/jld

Enclosure

cc: Administrative Law Judge Mary D. Long (via electronic mail – malong@pa.gov)
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).

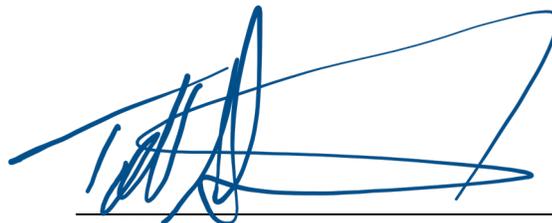
VIA ELECTRONIC MAIL

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Todd S. Stewart

DATED: June 2, 2025

3. On May 21, 2025, Solar Projects filed a Petition to Intervene in the above-captioned matter.

4. By Order issued May 22, 2025, the Pennsylvania Public Utility Commission (“Commission”) suspended Supplement No. 172. By Order issued May 22, 2025, a Prehearing Conference was scheduled to be held telephonically on June 3, 2025, at 9:00 a.m.

A. ISSUES

5. Supplement 172 if allowed to go into effect will increase demand charges for certain customers, including Solar Projects, by approximately 1000% by changing the definition of demand charges. 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.

B. DISCOVERY

6. Solar projects will commence discovery as soon as possible and will cooperate in adopting modifications to the Commission’s discovery rules as needed for the efficient conduct of discovery in this matter.

C. WITNESSES

7. Solar Projects intend to present at least one witness in this matter, but that witness has not yet been identified. Solar Projects will identify said witness as soon as possible and will notify Your Honor and the other parties at that time.

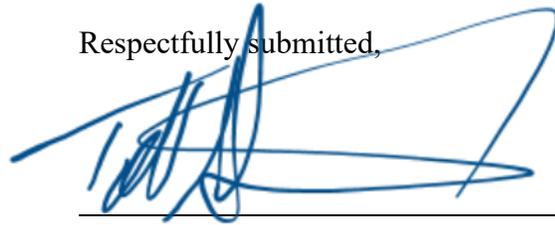
D. LITIGATION SCHEDULE

8. Solar Projects has cooperated with the other parties and will continue to do so to develop a litigation schedule that is acceptable to all parties.

E. CONCLUSION

9. Solar Projects hereby submits its Prehearing Memorandum in anticipation of the Prehearing Conference scheduled for June 3, 2025, at 9:00 a.m.

Respectfully submitted,



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DATED: June 2, 2025