

Stevens & Lee

17 N. Second Street, 16th Floor
Harrisburg, PA 17101
(717) 234-1090
www.stevenslee.com

Direct Dial: (717) 724-3445
Email: nicholas.stobbe@stevenslee.com
Direct Fax: (610) 236-4915

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. Wellsboro Electric Company*
Docket No. R-2025-3054392

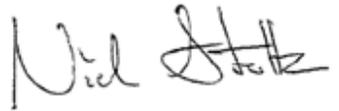
Dear Secretary Homsher:

Enclosed for filing with the Pennsylvania Public Utility Commission is the Prehearing Conference Memorandum 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 filing 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
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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

Adelou A. Bakare, Esq.
Matthew L. Garber, Esq.
Rebecca Kimmel, Esq.
McNees Wallace Nurick LLC
100 Pine Street
P.O. Box 1166
Harrisburg, PA 17108
abakare@mcneeslaw.com
mgarber@mcneeslaw.com
rkimmel@mcneeslaw.com
*Counsel for Citizens' Electric Company
Of Lewisburg, PA and Wellsboro Electric
Company*

Michael A. Podskoch, Jr. Esq.
Adam J. Williams, Esq.
Pennsylvania Public Utility Commission
Bureau of Investigation and Enforcement
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17120
mpodskoch@pa.gov
adawilliam@pa.gov

Steven C. Gray, Esq.
Rebecca Lyttle, Esq.
Office of Small Business Advocate
555 Walnut Street
1st Floor, Forum Place
Harrisburg, PA 17101
sgray@pa.gov
relyttle@pa.gov

Melanie Joy El Atieh, Esq.
Ryan Morden, Esq.
Barrett C. Sheridan, Esq.
Aiden McEvoy, Paralegal
Lori Arnsparger, Paralegal
Office of Consumer Advocate
555 Walnut Street
5th Floor, Forum Place
Harrisburg, PA 17101-1923
melatieh@paoca.org
rmorden@paoca.org
bsheridan@paoca.org
amcevoy@paoca.org
larnspargere@paoca.org

Zachary and Ashley Wattles
188 Butler Road
Wellsboro, PA 16901
a.wattles@outlook.com

Todd S. Stewart, Esq.
HMS Legal LLP
501 Corporate Circle, Suite 302
Harrisburg, Pa 17110
tsstewart@hmslegal.com
Counsel for Solar Projects

Pamela C. Polacek, Esq.
C and T Enterprises, Inc.
P.O. Box 129
Venetia, PA 15367
ppolacek@ctenterprises.org

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	:	
	:	

**PREHEARING CONFERENCE MEMORANDUM OF SOLAR ENERGY INDUSTRIES
ASSOCIATION AND COALITION FOR COMMUNITY SOLAR ACCESS**

TO ADMINISTRATIVE LAW JUDGE MARY D. LONG

Pursuant to 52 Pa. Code § 5.224(c) and the Prehearing Conference Order dated May 22, 2025, issued by Administrative Law Judge Mary D. Long (the “ALJ”), the Solar Energy Industries Association (“SEIA”) and the Coalition for Community Solar Access (“CCSA”) (collectively, the “Joint Solar Advocates”) hereby submit this Prehearing Conference Memorandum.

I. SERVICE OF DOCUMENTS

1. The Joint Solar Advocates request that all documents be served on:

Michael A. Gruin, Esq.
Attorney I.D. 78625
Nicholas A. Stobbe, Esq.
Attorney I.D. 329583
17 N. 2nd St., 16th Fl.
Harrisburg, PA 17101
Tel. (717) 724-3445
(717) 255-7365
Fax (610) 235-4915
(610) 988-0852
mag@stevenslee.com
nicholas.stobbe@stevenslee.com

and

Eric J. Wallace, Esq.
GreeneHurlocker, PLC
4908 Monument Avenue, Suite 200
Richmond, Virginia 23230
Tel. (804) 672-4544
Fax. (804) 672-4540
EWallace@GreeneHhurlocker.com
(*Pro Hac Vice forthcoming*)

Please be advised that Mr. Nicholas A. Stobbe will speak as the lead attorney for the Joint Solar Advocates for purposes of the prehearing conference. However, other counsel for the Joint Solar Advocates will be participating and available during the telephonic prehearing conference as needed.

2. The Joint Solar Advocates agree to receive service of documents electronically in this proceeding.

3. This proceeding was initiated on or about April 30, 2025, when Citizens' Electric Company of Lewisburg, PA ("Citizens") filed Supplement No. 172 to Tariff Electric – Pa. P.U.C. No. 14 ("Citizens' Tariff No. 14") with the Commission ("Citizens' Rate Case") to be effective on June 29, 2025. Similarly, on or about April 30, 2025, Wellsboro Electric Company ("Wellsboro") filed Supplement No. 162 to Tariff Electric Pa. P.U.C. No. 8 ("Wellsboro Tariff No. 8") with the Commission ("Wellsboro Rate Case").

4. Through the Citizens' Rate Case, Citizens proposed to increase distribution rates in the amount of approximately \$1.79 million across its customer base of approximately 7,176 customers.

5. Additionally, Citizens proposed 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.

6. Through the Wellsboro Rate Case, Wellsboro seeks to increase distribution revenue in the amount of \$2.9 million across its customer bases of approximately 6,478 customers.

7. 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 Generation Supply Service Rate (“GSSR”) 1 or GSSR-2 rate schedules. *See* Wellsboro St. No. 4, p. 22.

8. On May 7, 2025, the Office of Small Business Advocate (“OSBA”) filed a Notice of Appearance in both the Citizens’ and Wellsboro Rate Cases.

9. On May 12, 2025, the Office of Consumer Advocate (“OCA”) filed a Notice of Appearance, Formal Complaint, and Public Statement in both the Citizens’ and Wellsboro Rate Cases.

10. On May 14, 2025, OSBA filed a Formal Complaint, Public Statement, and Verification in both the Citizens’ and Wellsboro Rate Cases.

11. On May 15, 2025, the Commission’s Bureau of Investigation and Enforcement (“I&E”) filed a Notice of Appearance in both the Citizens’ and Wellsboro Rate Cases.

12. On May 21, 2025, Kelly Road Solar, LLC, Lancaster Avenue Solar, LLC, and Twilight Renewables, LLC (collectively, “Solar Projects”) filed a Petition to Intervene in the Citizens’ Rate Case.

13. On May 22, 2025, the Commission issued Orders suspending Citizens’ Tariff No. 14 and Wellsboro Tariff No. 8 until January 29, 2026, unless otherwise permitted by Commission Order(s) to become effective at an earlier date.

14. Also on May 22, 2025, the Commission issued a Telephonic Prehearing Conference Notice, scheduling a Telephonic Prehearing Conference before the ALJ at 9:00 a.m. on June 3, 2025. That same day, the ALJ issued a Prehearing Conference Order.

15. On June 2, 2025, the Joint Solar Advocates filed a Joint Petition to Intervene in the Citizens' and Wellsboro Rate Cases, concurrent with the instant Prehearing Memorandum.

16. Pursuant to 52 Pa. Code § 5.224(c) and the Prehearing Conference Order dated May 22, 2025, the Joint Solar Advocates hereby submit this Prehearing Conference Memorandum in both the Citizens' and Wellsboro Rate Cases.

II. ISSUES

17. The Joint Solar Advocates' preliminary review of both Rate Cases indicates a need for Commission to address the following items:

- (a) whether the requested rate increases are appropriate and supported by law;
- (b) whether the proposed distribution and rate design of the increases among customer classes is appropriate in light of the cost-of-service study(ies) results;
- (c) whether Citizens' and Wellsboro's proposals to reclassify net-metering customer-generators based on their net power flow from or onto its distribution system as a way of categorizing customer generators into either the GSSR-1 or GSSR-2 rates is appropriate and supported by law and policy; and
- (d) whether Citizens' and Wellsboro's rate reclassification proposals for net-metering customer-generators is consistent with the Alternative Energy Portfolio Standards ("AEPS") Act.

The Joint Solar Advocates anticipate pursuing these issues during this proceeding and explicitly reserve the right to raise further issues and respond to all issues raised by other parties.

III. WITNESSES

18. At this time, the Joint Solar Advocates intend to offer Kevin Lucas, Vice President of Policy Analysis with SEIA, as a witness in these proceedings. Mr. Lucas will offer testimony on the issues identified in Section II, *supra*. The Joint Solar Advocates reserve the right to call additional witnesses and to address other issues as they arise throughout these proceedings.

19. The Joint Solar Advocates also intend to participate in these proceedings through the submission of discovery, cross-examination of other parties' witnesses, submission of briefs, and the filing of exceptions and reply exceptions, if necessary.

IV. PROCEDURAL SCHEDULE

20. The Joint Solar Advocates will cooperate with the ALJ and the parties at the Prehearing Conference to finalize appropriate and equitable procedural schedule(s) in accordance with the Commission's regulations and the directive(s) of the ALJ.

V. DISCOVERY

21. The Joint Solar Advocates will cooperate with the ALJ and the parties at the Prehearing Conference to finalize appropriate modifications to the discovery rules in accordance with the Commission's regulations and the directive(s) of the ALJ.

VI. SETTLEMENT

22. The Joint Solar Advocates are willing to participate in discussions with the other parties in an attempt to resolve the issues in these proceedings.

[Signature on Following Page]

Respectfully submitted,



Michael A. Gruin, Esq.
Attorney I.D. 78625
Nicholas A. Stobbe, Esq.
Attorney I.D. 329583
17 N. 2nd St., 16th Fl.
Harrisburg, PA 17101
Tel. (717) 724-3445
(717) 255-7365
Fax (610) 235-4915
(610) 988-0852
mag@stevenslee.com
nicholas.stobbe@stevenslee.com

and

Eric Wallace, Esq.
GREENEHURLOCKER, PLC
4908 Monument Avenue, Suite 200
Richmond, Virginia 23230
Tel: (804) 672-4544
Fax: (804) 672-4540
EWallace@Greenehurlocker.com
(*Peo Hac Vice forthcoming*)
Counsel for SEIA and CCSA

Dated: June 2, 2025