

COMMONWEALTH OF PENNSYLVANIA



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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.
Valley Energy, Inc.
Docket No. R-2025-3054393

Dear Secretary Homsher:

Attached for electronic filing, please find enclosed a copy of Prehearing Conference Memorandum submitted on behalf of the Office of Consumer Advocate in this proceeding.

Copies have been served on the parties as indicated on the enclosed Certificate of Service.

Respectfully submitted,

/s/ Melanie Joy El Atieh
Melanie Joy El Atieh, Esq.
Deputy Consumer Advocate
PA Attorney I.D. # 209323
Email: MEIAtieh@paoca.org

Enclosures

cc: Administrative Law Judge Mary D. Long (Email Only: malong@pa.gov)
Certificate of Service

CERTIFICATE OF SERVICE

Pennsylvania Public Utility Commission	:	
	:	
v.	:	Docket No. R-2025-3054393
	:	
Valley Energy, Inc.	:	
	:	

I hereby certify that I have this day filed electronically on the Commission's electronic filing system and served a true copy of the following document, the Office of Consumer Advocate's Prehearing Conference Memorandum, upon parties of record in this proceeding in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant), in the manner and upon the persons listed below.

Dated this 2nd day of June 2025.

SERVICE BY E-MAIL ONLY

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Dated: June 2, 2025

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BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Pennsylvania Public Utility Commission	:	
	:	Docket Nos. R-2025-3054393
v.	:	
	:	
Valley Energy, Inc.	:	

PREHEARING CONFERENCE MEMORANDUM
OF THE
OFFICE OF CONSUMER ADVOCATE

Pursuant to the Prehearing Conference Order issued on May 22, 2025, in the above-captioned proceeding, by the Honorable Administrative Law Judge (ALJ) Mary D. Long of the Office of Administrative Law Judge (OALJ) of the Pennsylvania Public Utility Commission (Commission), and pursuant to Section 333 of the Public Utility Code (Code), 66 Pa. C.S. Section 333, the Commission's regulations at 52 Pa. Code Sections 5.221-5.224, the Pennsylvania Office of Consumer Advocate (OCA) submits the following Prehearing Conference Memorandum.

I. INTRODUCTION AND PROCEDURAL HISTORY

On April 30, 2025, Valley Energy, Inc. (Valley, or the Company) filed Supplement No. 69 to Tariff Gas Pa. P.U.C. No. 2 with the Commission. The Company proposes to increase rates to produce additional overall revenues of \$1,626,000 million per year, a 25.1% increase in overall distribution revenue requirement. Valley provides gas distribution service to approximately 7,420 residential, commercial, industrial, and transportation customers in portions of Bradford County, Pennsylvania.

Under the Company's proposal, the total bill for distribution charges for a residential customer purchasing 76 Ccf per month would increase by \$12.03, from \$40.54 to \$52.57, or by approximately 29.66%. The Company has proposed increasing the monthly residential customer charge from \$12.35 to \$14.00, or by 13.36%. The Company proposes a return on equity of 11.65% resulting in an overall rate of return of 8.27%, in conjunction with a capital structure of 48.94% equity and 51.06% debt.

On May 12, 2025, the OCA filed a Formal Complaint, Public Statement, and Notice of Appearance in this proceeding to protect the interests of consumers in the Company's service territory and to ensure that the Company is permitted to implement only a level of rates that is just and reasonable and in accordance with sound ratemaking principles.

On May 8, 2025, the Commission's Bureau of Investigation & Enforcement (I&E) filed a Notice of Appearance. Also on May 8, 2025, the Office of Small Business Advocate (OSBA) filed a Notice of Appearance. On May 15, 2025, OSBA filed a Formal Complaint and Public Statement.

On May 22, 2025, the Commission issued an Order that initiated an investigation into the lawfulness, justness, and reasonableness of the proposed rate increase in this filing in addition to the Company's existing rates, rules, and regulations, assigned this matter to the OALJ for further proceedings as appropriate, and suspended the effective date of the tariff until January 29, 2026.

II. ISSUES

Based upon a preliminary analysis of the Company's general rate increase filing, the OCA has compiled a list of issues and sub-issues which it anticipates will be included in its investigation of the Company's rate request. It is anticipated that other issues may arise and may be pursued once the answers to all the OCA's interrogatories have been received and analyzed. The issues and

sub-issues set forth below, and others that may develop during discovery, will be analyzed and presented as appropriate by the OCA with the assistance of its expert witnesses:

A. Rate of Return

1. The OCA will perform a detailed analysis of the cost of common equity claimed by the Company as well as the overall rate of return as claimed by the Company. Also, the OCA will carefully examine the Company's methodologies and supporting data used to develop its final cost of common equity claim.

2. The OCA will examine whether the capital structure proposed by the Company is representative of the period in which rates will be in effect and is otherwise appropriate for ratemaking purposes.

3. The OCA will examine the embedded cost of debt claimed by the Company to determine whether it is reasonable and appropriate for ratemaking purposes.

4. The OCA will examine whether any company-specific adjustments proposed by the Company are justified.

5. The OCA will examine the impact of Company's proposed alternative ratemaking mechanisms on its risk profile.

B. Rate Base/ Measure of Value

1. The OCA will examine the reasonableness and accuracy of Company's projections related to the utility plant in service at the time relevant to this proceeding.

2. The OCA will review the Company's claim for plant additions during the Future Test Year (FTY) and Fully Projected Future Test Year (FPFTY).

3. The OCA will investigate whether the Company's adjustment to rate base for depreciation reserve is appropriate.

4. The OCA will examine the Company's projections of non-investor supplied funds, including but not limited to, customer deposits, customer advances for construction, and contributions in aid of construction.

5. The OCA will examine the Company's proposal to include unamortized balances in rate base.

6. The OCA will examine the Company's claim for materials and supplies.

7. The OCA will examine the Company's calculation and amount of cash working capital.

8. The OCA will examine the reasonableness and lawfulness of rate base claims for amounts paid to affiliates, in accordance with Section 2101 of the Public Utility Code. 66 Pa. C.S. § 2101 *et seq.*

9. The OCA will examine the Company's Accumulated Deferred Income Tax (ADIT) balances and excess ADIT balances.

10. The OCA will examine the reasonableness of the Company's proposed Allowance for Funds Used During Construction (AFUDC) for land held for future use, if applicable.

C. Revenues and Expenses

1. The OCA will examine the Company's claimed revenues and any adjustments to the level of revenues.

2. The OCA will seek to ascertain whether the Company's claimed expenses are supported, reasonable, and appropriate.

3. The OCA will examine whether the projected number of customers in the FTY and FPFTY are reasonable and accurate.

4. The OCA will examine whether the Company's claims of sales and revenues during the FTY and FPFTY are reasonable and accurate.

5. The OCA will examine whether the Company's projections of revenues in the future periods are reasonable and accurate including, but not limited to, its billed days adjustments, metered sales and the impact of conservation measures, and miscellaneous revenue adjustments.

6. The OCA will examine whether the Company's projections of number of employees, overtime, and incentive pay are reasonable and accurate.

7. The OCA will examine the costs associated with the accrual of retirement benefits other than pensions for the Company's employees or contributions to pension funds.

8. The OCA will examine the justness and reasonableness of the Company's employee healthcare expense.

9. The OCA will examine the appropriateness of the Company's pro forma claim for rate case expense.

10. The OCA will examine the reasonableness of the Company's proposed purchased power expense claims.

11. The OCA will examine the Company's request for depreciation expenses to determine whether it is just and reasonable.

12. The OCA will examine the justness and reasonableness of the Company's claim for insurance costs.

13. The OCA will examine the justness and reasonableness of the Company's proposed expense amortizations.

14. The OCA will examine the justness and reasonableness of the Company's claim for regulatory commission costs.

15. The OCA will examine the justness and reasonableness of the Company's claims for other operations and maintenance expenses.

16. The OCA will examine the justness and reasonableness of the Company's claims for service company expenses, including the allocated expenses of affiliated interests.

17. The OCA will examine the justness and reasonableness of the Company's claimed rate case normalization period.

18. The OCA will examine if any cost savings identified in the most recent Management and Operations Audit should be reflected, if relevant, which was conducted since the Company's prior general rate increase request was filed.

19. The OCA will examine the justness and reasonableness of the Company's claimed uncollectibles expense.

20. The OCA will examine the Company's claimed revenues and any adjustments to the level of revenues.

D. Taxes

1. The OCA will examine issues related to the calculation of taxes including, but not limited to, calculation of federal and state income taxes and the amount of those taxes included as expenses for ratemaking purposes and will examine whether the Company is in compliance including with Act 40 of 2016 (66 Pa. C.S. § 1301.1).

2. The OCA will examine the reasonableness of the Company's proposal regarding the tax repairs deductions, and its claims for income taxes, property taxes, and general assessments.

3. The OCA will examine the effect of the Tax Cuts and Jobs Act on the Company's tax expense and its ADIT accounts and the amount, if any, that needs to be returned to ratepayers as a result.

4. The OCA will examine the Company's level of Public Utility Reality Tax (PURTA) and property tax expense.

E. Rate Structure/ Cost of Service / Rate Design/ Tariffs

1. The OCA will examine the reasonableness of Company's proposed distribution or allocation of the revenue increase among customer classes to determine whether the proposal meets all legal requirements and sound ratemaking principles.

2. The OCA will examine Company's cost of service studies, including the methodology used and the reasonableness of the allocations.

3. The OCA will examine the reasonableness and appropriateness of the Company's proposed tariff changes, including all proposed surcharges.

4. The OCA will examine all other cost allocation and rate design proposals.

F. Low-Income Programs

1. The OCA may analyze current and proposed Company operations, practices, procedures and outreach related to serving low-income customers.

2. The OCA may assess the impact of the Company's proposed rate increase on universal service, including the overall costs of customer assistance programs as affected by the Company's rate design.

3. The OCA may examine how Company's proposed rate increase, rate structure and any proposed new alternative ratemaking and new surcharges will affect low-income and/or low-usage customers.

4. The OCA may review the Company's current bill discount programs, arrearage management programs, or lack thereof, and proposed changes to the programs.

5. The OCA may review the Company's affordability analysis.

G. Quality of Service

1. The OCA may review the Company's quality of service to ensure that it is providing safe, adequate, and reliable service that is consistent with the requirements of Section 1501 of the Public Utility Code.

2. The OCA may investigate any quality of service complaints by the Company's customers.

H. Customer Service

1. The OCA may review the Company's consumer protection policies and programs in order to ensure compliance with Chapter 56 of the Commission's regulations.

2. The OCA may examine the Company's customer service, including performance trends, internal training, management oversight, policies, and programs.

3. The OCA may examine the Company's consumer education programs, particularly with regard to changes in billing and collection rights and remedies, and complaint processes.

4. The OCA may examine the Company's compliance and reporting as required in the last rate case concerning service and service quality.

5. The OCA may examine the Company's request for a management performance adder to its return on equity and rate of return in light of the Company's customer service performance.

6. The OCA may examine the Company's response to the most recent Commission Management Audit.

I. Other Issues

1. The OCA will examine any relevant issues that arise as a result of the Company's operations.

2. The OCA will investigate to ensure that the Company is complying with all prior orders.

3. The OCA reserves the right to examine other issues affecting the Company's revenue requirements, rates, charges, and other tariff provisions as they are identified through discovery.

III. WITNESSES

The OCA intends to present the direct, rebuttal, and surrebuttal testimonies, as may be necessary, of the below witnesses. Each witness will present testimony in written form and will attach various exhibits, documents, and explanatory information, as may be necessary.

Revenue Requirement / Accounting

Greg Meyer
Brubaker & Associates, Inc.
16690 Swingley Ridge Road, Suite 140
Chesterfield, MO 63017
gmeyer@consultbai.com

Cost of Service / Rate Structure/ Rate Design

Michael Deupree
Acadian Consulting Group
5800 One Perkins Place Drive, Suite 5-F
Baton Rouge, LA 70808
michaeldeupree@acadianconsulting.com

Rate of Return / Cost of Capital /
Capital Structure

Christopher Walters
Brubaker & Associates, Inc.
16690 Swingley Ridge Road, Suite 140
Chesterfield, MO 63017
cwalters@consultbai.com

The OCA specifically reserves the right to call additional witnesses, as necessary, and retains the flexibility to have the witnesses above address other areas of this case as the case proceeds. If the OCA determines that additional witnesses will be necessary for any portion of its case, it will notify all parties of record immediately.

IV. CONSOLIDATION AND PROPOSED LITIGATION SCHEDULE

On Thursday, May 29, 2025, Counsel for Valley notified parties by email correspondence that they intend to request that this proceeding be formally consolidated for purposes of the procedural schedule with two rate proceedings filed simultaneously by affiliated utilities who share a parent company with Valley, Citizens Electric found at Docket No. R-2025-3054394 and Wellsboro Electric, found at Docket No. R-2025-3054392.

While the OCA does not object to consolidation of the proceedings for purposes of the procedural schedule, the OCA emphasizes that there are three different cases with three separate service territories, revenue requirements, and cost allocations, which must be addressed separately in each general rate increase proceeding. Additionally, all the other pertinent issues that traditionally get reviewed in a general rate increase proceeding are unique to each company, Valley, Citizens Electric, and Wellsboro Electric, and must be reviewed separately as well. As a result, the OCA requires sufficient time to conduct discovery and develop expert witness testimony to ensure the adequate development of a record in each rate case proceeding.

On the issue of the procedural schedule, and on the need for sufficient time for the OCA as a statutory advocate to do the work necessary to sufficiently develop the record, the OCA notes that the ALJ is unavailable on September 16, 17 full days, September 18 half day, September 19 – 26 full days. Additionally, counsel for the Company has indicated in email correspondence that one of its attorneys is unavailable the week of September 9-12. While the OCA respects and

intends to work around the limited availability of the presiding officer, the OCA notes that the Company's stated unavailability the week of September 9-12 leaves very limited options for scheduling evidentiary hearings in a manner that will allow sufficient time for development of expert written testimony prior to the hearing and for the preparation of briefs after the hearing.

The OCA continues to work with the Company and the parties on a procedural schedule that is a reasonable compromise of the parties' competing interests within the time afforded for litigation of this matter. The OCA proposes the following schedule:

Public Input Hearings	Week of June 23
Other Parties' Direct Testimony	Friday, July 25, 2025 (by 1:30 PM)
Other Parties' Supplemental Direct Testimony Regarding Public Input Hearings	May be needed depending on timing of public input hearings and other party direct testimony
Rebuttal Testimony (all parties and all issues)	Friday, August 15, 2025 (by 1:30 PM)
Surrebuttal Testimony (all parties and all issues)	Friday, Sept. 5, 2025 (by 1:30 PM)
Written Rejoinder Outline	Friday, Sept. 12, 2025 (by 4:00 PM)
Evidentiary Hearings (in-person)	September 15 (full day) and September 18 (full day or half day, if necessary) *
Main Briefs	Friday, October 3, 2025
Reply Briefs	Friday, October 17, 2025

*Given the unique circumstances here of the limited unavailability of key participants at the hearing, and in the interests of efficiency, permitting the proposed September 18 hearings to be conducted telephonically would serve the public interest. If a third day of hearings is required by the ALJ, the OCA requests again permission for telephonic hearing to the extent it will address competing interests in setting a reasonable procedural schedule. Another option is that the OALJ can assign a second presiding officer to these proceedings for purposes of the evidentiary hearings.

The OCA requests that the dates included in any litigation schedule in this matter be considered “in-hand” dates and that electronic service on the due date will satisfy the “in-hand” requirement.

V. SERVICE ON THE OCA

The OCA respectfully requests that the Presiding Officer permit electronic service without the requirement of a follow-up hard copy. The OCA will be represented in this case by the attorneys listed below.

Melanie Joy El Atieh, Deputy Consumer Advocate
Ryan Morden, Assistant Consumer Advocate
555 Walnut Street, 5th Floor, Forum Place
Harrisburg, PA 17101-1923
Phone: (717) 783-5048
E-Mails:

MElAtieh@paoca.org
RMorden@paoca.org

The OCA also requests that the ALJ instruct the parties on the record as to whether consumers who have filed formal rate complaints in this proceeding should be included on the official service lists if those complainants have not indicated either at the prehearing conference, or prior to the prehearing conference, that they wish to be active parties to this proceeding.

For the purposes of the Prehearing Conference, Melanie Joy El Atieh will be the primary attorney speaking on behalf of the OCA.

VI. SETTLEMENT

The OCA will participate in settlement discussions in this matter.

VII. DISCOVERY

In conjunction with its proposed schedule, the OCA proposes the following modifications to the Commission’s procedural rules regarding discovery. The OCA requests that the Presiding

Officers direct that the modifications will take effect when addressed during the on the record prehearing conference and apply to all future discovery requests served on and after the date of the prehearing conference dated June 3, 2025. The OCA also requests that any outstanding interrogatories or requests for admissions are due no later than 10 calendar days after the Prehearing Conference to the extent such responses are due later than such date, in accordance with Paragraph A below.

- A. Answers to written interrogatories and requests for document production, entry for inspection, or other purposes shall be served in-hand within ten (10) calendar days of service.
- B. Objections to interrogatories and/or requests for production shall be communicated orally to the propounding party within three (3) calendar days of service of the interrogatories; unresolved objections shall be served in writing to the propounding party within five (5) calendar days of service of the interrogatories and/or requests for production.
- C. Motions to dismiss objections and/or direct the answering of interrogatories and/or requests for production shall be filed within five (5) business days of service of written objections.
- D. Answers to motions to dismiss objections and/or answering of interrogatories and/or requests for production shall be filed within three (3) business days of service of such motions.
- E. Requests for admissions will be deemed admitted unless answered within ten (10) calendar days or objected to within five (5) calendar days of service.
- F. Answers to on-the-record data requests shall be served in-hand within five (5) calendar days of the requests.
- G. Any discovery or discovery-related pleadings (such as objections, motions, and answers to same) served after served after 4:30 p.m. Monday through Thursday or after 1:30 p.m. on a Friday or the day before a holiday will be deemed to have been served on the next business day for purposes of calculating the due date for any responsive filing.

After rebuttal is served, the OCA proposes that the deadlines should be reduced as follows:

- A. Answers to interrogatories and responses to requests for document production, entry for inspection, or other purposes shall be served within five (5) calendar days of service of the interrogatories or requests for production.
- B. Objections to interrogatories and/or requests for production shall be communicated orally to the propounding party within two (2) calendar days of service; unresolved objections shall be served on the propounding party in writing within three (3) calendar days of service of the interrogatories and/or requests for production.
- C. Motions to dismiss objections and/or direct the answering of interrogatories and/or requests for production shall be filed within three (3) business days of service of written objections.
- D. Answers to motions to dismiss objections and/or direct the answering of interrogatories and/or requests for production shall be filed within three (3) business days of service of such motions.
- E. Requests for admission shall be deemed admitted unless answered or objected to within three (3) calendar days of service.
- F. Discovery requests and discovery related pleadings (such as objections, motions, and answers to same) served after 4:30 p.m. Monday through Thursday or after 1:30 p.m. on a Friday or the day preceding a holiday shall be deemed to have been served on the next business day.

VIII. PREHEARING PROCEDURES

The OCA requests that the ALJ in their Prehearing Conference Order and Evidentiary Hearing Notice clarify that:

- A. Evidentiary hearing exhibits need not include all pre-served testimony which is circulated to the ALJ and parties in this proceeding in accordance with the above-referenced procedural schedule. However, such pre-served testimony may be identified for movement into the record at the hearing through an inventory of pre-served testimony which is provided as a hearing exhibit.
- B. Evidentiary hearing exhibits may be provided to the ALJ and parties by 10am the day before the start of evidentiary hearings with the exception of hearing exhibits related to rejoinder which may be provided by the end of the day on same day.

IX. PUBLIC INPUT HEARINGS

The OCA will be prepared to discuss public input hearings at the prehearing conference. Given the magnitude of the requested rate increase, the size of the customer base, and the requests for public input hearings and complaints received thus far in this matter, the OCA respectfully requests that both in-person and telephonic public input hearings be held for the Company's customer base impacted by this rate filing.

Attached as Appendix A is the OCA's proposed draft Notice for the Public Input Hearing (to be completed with details as determined by the presiding ALJ). The OCA requests the following:

A. Given the size of the customer base and service territory, a total of three (3) Public Input Hearings be held, one in-person and two telephonic.

B. The in-person public input hearing should be scheduled as a daytime or an evening hearing at a location with accessible and free parking or easy access to public transportation.

C. The in-person public input hearing should be scheduled in conjunction with public input hearings for the Citizens Electric Co. and Wellsboro Electric Co. rate proceedings, which are filed under R-2025-3054394 and R-2025-3054392 respectively.

D. The telephonic public input hearings include a combination of daytime and evening hearings.

E. The telephonic public input hearings should be set up to serve customers in the above captioned proceeding and those referenced in Part C of this section.

F. Pre-registration be either encouraged or required for telephonic hearings only, and if required, pre-registration be required by 10:00 a.m. on the day of the telephonic Public Input Hearing at which the witness seeks to testify.

G. Hearing exhibits be required to be submitted to the ALJ by 10:00 a.m. the day before the Public Input Hearing at which the witness seeks to testify.

H. The Commission's notice of the Public Input Hearings will include the phone numbers and access codes necessary for participants to use to fully access all telephonic Public Input Hearings.

I. The Company will be required to, at a minimum, generate a notice of the Public Input Hearings that contains relevant information as to date, time, location, and phone numbers and access codes and further be required to advertise the notice: (1) in the general readership section (not legal section) of local newspapers within the service territory; (2) on its website; and (3) in social media posts which the Company utilizes to advertise generally.

J. That the other parties involved in the proceeding, including the OCA, be permitted to review these public input announcements prior to their publication and distribution and have input into which publications the ads are placed.

X. COMMON BRIEFING OUTLINE

The OCA's proposals for the common briefing outline are attached as Appendix B to this Prehearing Memorandum.

Respectfully submitted,

/s/Ryan Morden

Ryan Morden

Assistant Consumer Advocate

PA Bar ID # 335679

RMorden@paoca.org

Melanie Joy El Atieh

Deputy Consumer Advocate

PA Bar ID # 209323

MElAtieh@paoca.org

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(717) 783-5048

Counsel for:
Darryl A. Lawrence
Acting Consumer Advocate

DATED: June 2, 2025

OCA APPENDIX A

NOTICE OF IN-PERSON AND TELEPHONIC PUBLIC INPUT HEARINGS

For Valley Energy, Inc. Rate Increase Request

Docket No.
R-2025-3054393

The Pennsylvania Public Utility Commission (PUC) will conduct 3 Public Input Hearings concerning the general rate increase requests filed by Valley Energy, Inc. April 30, 2025, seeking to increase gas distribution rates by \$1,626,000 million per year. The in-person and telephonic hearings will be held at the following times and places:

Presiding Officer: Administrative Law Judge Mary D. Long

IN-PERSON PUBLIC INPUT HEARINGS

Pre-registration is not required.

Date: [Here]
Time: [Here]
Location: [Here]

TELEPHONIC PUBLIC INPUT HEARINGS

Pre-registration is [encouraged/required]. Read below.

Date: [Here]
Time: [Here]

Pre-registration is [encouraged/required] by [same day] at 10AM.

Date: [Here]
Time: [Here]

Pre-registration is [encouraged/required] by [same day] at 10AM.

Toll-free Conference Number: xxx.xxx.xxxx
PIN Number: xxxxxxxx

- You must dial the toll-free Conference number above
- You must enter the PIN number above when instructed
- You must speak your name when prompted, and press #
- Then, the telephone system will connect you to the hearing

PRE-REGISTRATION FOR TELEPHONIC PUBLIC INPUT HEARINGS: To testify at the telephonic Public Input Hearings, pre-registration is [encouraged/required] by [day of the hearing] at 10AM. Failure to pre-register could result in you not being called to testify by the PUC judge. To pre-register to testify by telephone, please contact the PUC Judge's Legal Assistant, [name], by email at [email address] or by phone at [xxx.xxx.xxxx] and provide the requested information.

NEED ASSISTANCE WITH PRE-REGISTRATION? If you need assistance pre-registering to testify, you may have someone register for you, but they will need to provide the PUC Judge all the information listed above. Additionally, if more than one person in your household would like to testify, one person may pre-register for other individuals in the same household by providing the PUC Judge's Legal Assistant with the above-listed information for each individual.

REQUESTS FOR INTERPRETERS: If you require an interpreter, please pre-register as soon as possible. If you register too close to the hearing date, we may not have enough time to arrange for an interpreter. If you request an interpreter, the PUC will make reasonable efforts to have one present. AT&T Relay Service number for persons who are deaf or hearing-impaired: 1-800-654-5988.

HEARING EXHIBITS: If you have any hearing exhibits to which you will refer during the hearing, please email them to the PUC Judge's Legal Assistant, [name], at [email address]. The PUC Judge will forward your exhibits to all the parties. Exhibits for the public input hearing must be received by the PUC Judge by [the day before the hearing] at 10AM.

QUESTIONS? The Pennsylvania Office of Consumer Advocate (OCA) represents the interests of utility customers before the PUC. If you have questions about the public input hearings or the Company's requested rate increase, please contact the OCA toll free at 1-800-684-6560 or by email at consumer@paoca.org. Additionally, the OCA can help customers pre-register for the Public Input Hearings.

OTHER WAYS TO BE HEARD: If you want to be heard about the proposed rate increase but do not want or cannot testify at the Public Input Hearings, you may file a formal complaint or comment to the proposed rate increase. Please visit the PUC's website to use the applicable form available at <https://www.puc.pa.gov/complaints/formal-complaints/>

OCA APPENDIX B

OCA's Proposed Common Briefing Outline For General Rate Increase Proceeding

- I. Introduction
- II. Summary of Argument
- III. Overall Position on Rate Increase
- IV. Rate Base
 - A. Plant in Service
 - B. Depreciation Reserve
 - C. Additions to Rate Base
 - D. Deductions from Rate Base
- V. Revenues
- VI. Expenses
- VII. Taxes
- VIII. Rate of Return
- IX. Rate Structure and Rate Design
 - A. Cost of Service Study
 - B. Revenue Allocation
 - C. Rate Design/ Tariff Structure
 - D. Summary and Alternatives
- X. Customer Service / Quality of Service
- XI. Customer Assistance Programs
- XII. Tariff Issues (Not Briefed Above)
- XIII. Miscellaneous Issues
- XIV. Conclusion

Note: Appropriate modifications may be made. For instance, a party might add "Affiliated Interest Expenses" as a major topic heading or might brief only rate structure and not use other topic headings. A summary and alternatives should be provided under "Rate Structure" but the "Rate Base" and "Rate Structure" formats shown may be modified, as appropriate. Additional subheadings should be used, as appropriate.