



COMMONWEALTH OF PENNSYLVANIA
PENNSYLVANIA PUBLIC UTILITY COMMISSION
COMMONWEALTH KEYSTONE BUILDING
400 NORTH STREET, HARRISBURG, PA 17120

BUREAU OF
INVESTIGATION
&
ENFORCEMENT

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
I&E Prehearing Memorandum

Dear Secretary Homsher:

Enclosed for electronic filing please find the Prehearing Memorandum of the Bureau of Investigation and Enforcement in the above-captioned proceeding.

Copies are being served on parties per the attached Certificate of Service. Should you have any questions, please do not hesitate to contact me.

Sincerely,

A handwritten signature in black ink that reads 'Michael Podskoch'.

Michael A. Podskoch, Jr.
Prosecutor
Bureau of Investigation and Enforcement
PA Attorney ID No. 330132
(717) 783-6151
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MAP/ac
Enclosures

cc: Administrative Law Judge Mary D. Long (*via email* – malong@pa.gov)
Per Certificate of Service

I. INTRODUCTION

On April 30, 2025, Citizens' Electric Company of Lewisburg, PA ("Citizens" or "Company") filed proposed Supplement No. 172 to Tariff Electric – Pa. P.U.C. No. 14 ("Supplement No. 172") with a proposed effective date of June 29, 2025. The rates set forth therein, if approved by the Commission, would increase Wellsboro's annual jurisdictional revenues by \$1.79 million, or 11%.

On May 7, 2025, the Office of Small Business Advocate ("OSBA") filed its Notice of Appearance. On May 12, 2025, the Office of Consumer Advocate ("OCA") filed a Formal Complaint and Public Statement and its Notice of Appearance. On May 14, 2025, OSBA filed a Formal Complaint and Public Statement. On May 15, 2025, I&E filed its Notice of Appearance. On May 21, 2025, Kelly Road Solar, LLC, Lancaster Avenue Solar, LLC, and Twilight Renewables, LLC (collectively "Solar Projects") filed a Petition to Intervene.

On May 22, 2025, the Commission entered an Order pursuant to Section 1308(d) of the Public Utility Code suspending the implementation of the proposed rates by operation of law until January 29, 2026, and opening an investigation into the lawfulness, justness, and reasonableness of the proposed rates, rules, and regulations contained therein. The case was assigned to the Office of Administrative Law Judge for the prompt scheduling of such hearings as may be necessary culminating in the issuance of a Recommended Decision.

A telephonic Prehearing Conference is scheduled on June 3, 2025 at 9:00 a.m. before Administrative Law Judge ("ALJ") Mary D. Long.

II. ISSUES

The following list represents I&E's preliminary determination of the potential issues in this proceeding:

1. Blanket Inflation Adjustment
2. COVID-19 Related Deferrals
3. Rate Case Expense
4. Membership Dues
5. Subscriptions
6. Lobbying Expenses
7. Insurance Expense
8. Meter Expense
9. Maintenance of Overhead Lines
10. Administrative and General Salaries
11. Office Supplies and Expenses
12. Maintenance of General Property
13. Maintenance of General Plant
14. Miscellaneous Expenses
15. Cash Working Capital
16. Overall Rate of Return
17. Cost of Debt
18. Cost of Common Equity
19. Proxy Group
20. Capital Structure
21. Rate Base
22. Cost of Service Study/Allocation
23. Present and Proposed Revenue
24. Rate Design
25. Scale back of Rates

The listing is as complete as can be made at this time. I&E specifically reserves the right to address other issues as it deems appropriate if any such relevant issues arise.

III. WITNESSES

It is currently expected that I&E may call the following expert witnesses without being limited thereto:

1. Zachari Walker, Fixed Utility Financial Analyst
2. Christopher Keller, Fixed Utility Financial Analyst
3. Ethan H. Cline, Fixed Utility Valuation Engineer

The I&E witnesses may be contacted through the information listed above for Mr. Podskoch. The witness list is provided without the benefit of complete discovery or analysis of the positions of the other parties to this proceeding. Accordingly, I&E reserves the right to call additional witnesses or withdraw the name of the witnesses listed above.

IV. EVIDENCE

I&E expects to present all written direct, rebuttal, and surrebuttal testimony and accompanying exhibits at the evidentiary hearings. Moreover, I&E intends to rely on the Company's filing, supplemental testimony, answers to data requests and interrogatories, annual reports and other documents submitted to the Commission, other relevant Commission filings, any other relevant Commonwealth agency letters or reports, general financial market information sources, and other public documents and reports. However, there may be issues of law or Commission policy that are not properly the subject of testimony or factual issues that are clear on the record and need not be supported by testimony. I&E thereby reserves the right to dispense with testimony when, in its opinion, an issue can be adequately addressed through briefing.

V. DISCOVERY

Discovery in this matter has begun and is ongoing. I&E has not proposed any discovery modifications. I&E will work with the parties to determine the appropriate discovery modifications in this proceeding.

VI. CONSOLIDATION

I&E supports the consolidation of the Wellsboro Electric Company base rate case (Docket No. R-2025-3054392), Valley Energy, Inc. base rate case (Docket No. R-2025-

3054393), and Citizens' Electric Company of Lewisburg, PA base rate case (Docket No. R-2025-3054394) for scheduling purposes only.

VII. SCHEDULE

I&E will work with the parties and the ALJ to develop a mutually agreeable litigation schedule in this proceeding. As of this date, the parties have not yet finalized a schedule.

I&E supports the following litigation schedule as proposed by OCA:

Non-Company Direct Testimony	July 25, 2025
Rebuttal Testimony	August 15, 2025
Surrebuttal Testimony	September 5, 2025
Rejoinder Outlines	September 12, 2025
Hearings	September 15, 2025 (full day) and September 18, 2025 (half day, if necessary)
Main Briefs	October 3, 2025
Reply Briefs	October 17, 2025

VIII. PUBLIC INPUT HEARINGS

I&E proposes the use of telephonic public input hearings to encourage increased participation by ratepayers.

IX. SERVICE OF DOCUMENTS

I&E requests that all documents in this proceeding be served on:

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

For purposes of satisfying in-hand requirements for discovery responses, prepared testimony, briefs, and other documents during this proceeding, and consistent with

Commission regulations and policy, I&E proposes to both only serve and accept electronic delivery of documents.

X. SETTLEMENT

I&E will maintain an open dialogue and is willing to make good faith efforts to successfully resolve this matter through settlement. In the event settlement discussions fail to result in a full and complete resolution of the matter, I&E is prepared to fully or partially litigate this proceeding.

Respectfully submitted,

A handwritten signature in black ink that reads "Michael Podskoch". The signature is written in a cursive, slightly slanted style.

Michael A. Podskoch, Jr.
Prosecutor
PA Attorney ID No. 330132

Pennsylvania Public Utility Commission
Bureau of Investigation and Enforcement
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17120

Dated: June 2, 2025

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission :
 :
 v. : Docket No. R-2025-3054394
 :
 Citizens' Electric Company of Lewisburg, PA :

CERTIFICATE OF SERVICE

I hereby certify that I am serving the foregoing **Prehearing Memorandum** dated June 2, 2025, in the manner and upon the persons listed below.

Served via Electronic Mail Only

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