



Todd S. Stewart  
717.703.0800  
[tsstewart@hmslegal.com](mailto:tsstewart@hmslegal.com)

Regulation is a maze. We can show you the way!

---

501 Corporate Circle, Suite 302, Harrisburg, PA 17110 Phone: 717.236.1300 Fax: 717.236.4841 [www.hmslegal.com](http://www.hmslegal.com)

June 20, 2025

**VIA ELECTRONIC MAIL**

Adeolu A. Bakare  
Matthew L. Garber  
Rebecca Kimmel  
McNees Wallace & Nurick, LLC  
100 Pine Street  
Harrisburg, PA 17101

RE: Pennsylvania Public Utility Commission v. Citizens' Electric Company of Lewisburg, PA; Docket No. R-2025-3054394; **KELLY ROAD SOLAR, LLC, LANCASTER AVENUE SOLAR, LLC, AND TWILIGHT RENEWABLES, LLC INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS, SET II DIRECTED TO CITIZENS' ELECTRIC COMPANY OF LEWISBURG, PA**

Dear Counsel:

Please find enclosed Kelly Road Solar, LLC, Lancaster Avenue Solar, LLC, and Twilight Renewables, LLC (collectively "Solar Projects") Interrogatories and Requests for Production of Documents, Set II directed to Citizens' Electric Company of Lewisburg, PA in the above-referenced matter. A copy of the Interrogatories and Requests for Production of Documents have been served as indicated on the attached Certificate of Service.

Thank you for your attention to this matter. If you have any questions, please feel free 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: Matthew L. Homsher, Secretary (via electronic filing Letter and COS only)  
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).

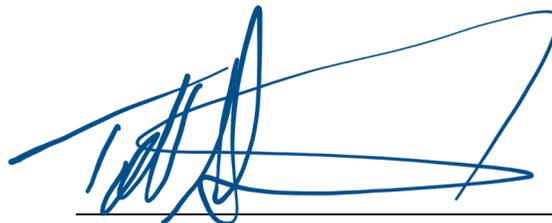
**VIA ELECTRONIC MAIL**

Adeolu A. Bakare  
Matthew L. Garber  
Rebecca Kimmel  
McNees Wallace & Nurick, LLC  
100 Pine Street  
Harrisburg, PA 17101  
[abakare@mcneeslaw.com](mailto:abakare@mcneeslaw.com)  
[mgarber@mcneeslaw.com](mailto:mgarber@mcneeslaw.com)  
[rkimmel@mcneeslaw.com](mailto:rkimmel@mcneeslaw.com)  
*Counsel for Citizens' Electric Company of  
Lewisburg, PA*

Steven C. Gray  
Rebecca Lyttle  
Office of Small Business Advocate  
555 Walnut Street  
Forum Place, 1<sup>st</sup> Floor  
Harrisburg, PA 17101  
[sgray@pa.gov](mailto:sgray@pa.gov)  
[relyttle@pa.gov](mailto:relyttle@pa.gov)

Michael Podskoch, Jr., Esquire  
Bureau of Investigation & Enforcement  
Commonwealth Keystone Building  
400 North Street  
Harrisburg, PA 17120  
[mpodskoch@pa.gov](mailto:mpodskoch@pa.gov)

Melanie Joy El Atieh, Esquire  
Ryan Morden, Esquire  
Barrett C. Sheridan, Esquire  
Office of Consumer Advocate  
55 Walnut Street  
Forum Place, 5<sup>th</sup> Floor  
Harrisburg, PA 17101-1923  
[MElAtieh@paoca.org](mailto:MElAtieh@paoca.org)  
[RMorden@paoca.org](mailto:RMorden@paoca.org)  
[BSheridan@paoca.org](mailto:BSheridan@paoca.org)



\_\_\_\_\_  
Todd S. Stewart

DATED: June 20, 2025