



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

BUREAU OF  
INVESTIGATION  
&  
ENFORCEMENT

July 18, 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,  
Bureau of Investigation and Enforcement v.  
Wellsboro and Corning Railroad Company  
Docket No. C-2025-  
**I&E Formal Complaint (Assessment)**

Dear Secretary Homsher:

Enclosed for electronic filing please find the **Formal Complaint** of the Bureau of Investigation and Enforcement of the Pennsylvania Public Utility Commission in the above-referenced matter.

Copies are being served on the parties of record in accordance with the attached Certificate of Service.

Should you have any questions, please do not hesitate to contact me.

Sincerely,

A handwritten signature in blue ink, appearing to read 'G. Rosul', written over a light blue horizontal line.

Grant Rosul  
Prosecutor  
Bureau of Investigation and Enforcement  
PA Attorney ID No. 318204  
(717) 783-5243  
[grosul@pa.gov](mailto:grosul@pa.gov)

GR/ac  
Enclosures

cc: Michael L. Swindler, Deputy Chief Prosecutor, I&E-Enforcement (*via email*)  
As per Certificate of Service

## NOTICE

**A. You must file an Answer within 20 days of the date of service of this Complaint.**

The date of service is the mailing date as indicated at the top of the Secretarial Letter. *See* 52 Pa. Code §1.56(a). The Answer must raise all factual and legal arguments that you wish to claim in your defense, include the docket number of this Complaint, and be verified. You may file your Answer by mailing an original to:

Matthew L. Homsher, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street  
Harrisburg, PA 17120

Or, you may eFile your Answer using the Commission's website at [www.puc.pa.gov](http://www.puc.pa.gov). The link to eFiling is located under the Filing & Resources tab on the homepage. If your Answer is 250 pages or less, you are not required to file a paper copy. If your Answer exceeds 250 pages, you must file a paper copy with the Secretary's Bureau.

**In Addition to filing your Answer with the Commission's Secretary, please electronically serve a copy on:**

Grant Rosul, Prosecutor  
Pennsylvania Public Utility Commission  
Bureau of Investigation and Enforcement  
400 North Street, 3<sup>rd</sup> Floor West  
Harrisburg, PA 17120  
[grosul@pa.gov](mailto:grosul@pa.gov)

B. If you fail to answer this Complaint within 20 days, the Bureau of Investigation and Enforcement will request that the Commission issue an Order imposing the requested relief.

C. You may elect not to contest this Complaint by paying the past due assessment and civil penalty, if any, within 20 days. Send only a certified check or money order made payable to the "Commonwealth of Pennsylvania," with the docket number indicated, and mail to:

Matthew L. Homsher, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street  
Harrisburg, PA 17120

D. If you file an Answer which either admits or fails to deny the allegations of the Complaint, the Bureau of Investigation and Enforcement will request the Commission to issue an Order imposing the requested relief set forth in this Complaint.

E. If you file an Answer which contests the Complaint, the matter will be assigned to an Administrative Law Judge for hearing and decision. The Judge is not bound by the penalty set forth in the Complaint and may impose additional and/or alternative penalties as appropriate.

F. If you are a corporation, you must be represented by legal counsel. 52 Pa. Code § 1.21.

G. Alternative formats of this material are available for persons with disabilities by contacting the Commission's ADA Coordinator at 717-787-8714.

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission,	:	
Bureau of Investigation and Enforcement	:	
	:	
v.	:	Docket No. C-2025-
	:	
Wellsboro and Corning Railroad Company	:	

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**FORMAL COMPLAINT**

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NOW COMES the Bureau of Investigation and Enforcement (“I&E”) of the Pennsylvania Public Utility Commission (“Commission”), by its prosecuting attorneys, and files this Complaint against Wellsboro and Corning Railroad Company (“Respondent”), pursuant to Section 701 of the Public Utility Code, 66 Pa.C.S. § 701. In support of its Complaint, I&E respectfully represents the following:

**I. PARTIES AND JURISDICTION**

1. The Pennsylvania Public Utility Commission, with a mailing address of Commonwealth Keystone Building, 400 North Street, Harrisburg, PA 17120, is a duly constituted agency of the Commonwealth of Pennsylvania empowered to regulate public utilities within the Commonwealth pursuant to the Public Utility Code, 66 Pa.C.S. §§ 101, *et seq.*

2. Complainant is the Commission’s Bureau of Investigation and Enforcement and is the entity established by statute to prosecute complaints against public utilities pursuant to 66 Pa.C.S. § 308.2(a)(11). *See also Implementation of Act 129 of 2008;*

*Organization of Bureaus and Offices*, Docket No. M-2008-2071852 (Order entered August 11, 2011) at 5 (transferring authority to prosecute assessment cases to I&E).

3. Complainant is represented by:

Grant Rosul  
Prosecutor  
[grosul@pa.gov](mailto:grosul@pa.gov)

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

4. Respondent is Wellsboro and Corning Railroad Company, utility code 500047, whose mailing address on record with the Commission is 200 Meridan Center Boulevard, Suite 270, Rochester, NY 14618, Attn: Ryan Hart.

5. The Commission issued Respondent a Certificate of Public Convenience for Railroad authority on January 1, 1993, at A-500047.

6. Respondent, operates a “railroad” as that term is defined at 66 Pa.C.S. § 102, as its rail lines constitute a “railroad, other than a street railway, by whatsoever power operated, for public use in the conveyance of passengers or property, or both....”

7. Respondent maintains railroads in the Commonwealth of Pennsylvania, among other locations.

8. Section 501(a) of the Public Utility Code, 66 Pa.C.S. § 501(a), authorizes and obligates the Commission to execute and enforce the provisions of the Public Utility Code.

9. Section 701 of the Public Utility Code, 66 Pa.C.S. § 701, authorizes the Commission to, *inter alia*, hear and determine complaints against public utilities for a violation of any law or regulation that the Commission has jurisdiction to administer.

10. Section 3301 of the Public Utility Code, 66 Pa.C.S. § 3301, authorizes the Commission to impose civil penalties on any public utility, or any other person or corporation subject to the Commission’s authority, for violation(s) of the Public Utility Code and/or Commission regulations. Section 3301(a)-(b) of the Public Utility Code, 66 Pa.C.S. § 3301(a)-(b), allows for the imposition of a separate civil penalty for each violation and each day’s continuance of such violation(s).

11. Respondent, as a Railroad operator in the Commonwealth, is subject to the power and authority of this Commission pursuant to Section 501(c) of the Public Utility Code, 66 Pa.C.S. § 501(c), which requires a jurisdictional entity to comply with Commission regulations.

12. Pursuant to the provisions of the applicable Commonwealth statutes and regulations, the Commission has jurisdiction over the subject matter of this complaint and the actions of Respondent related thereto.

## **II. FACTUAL BACKGROUND**

### **2024-2025 FISCAL YEAR**

13. On or about October 30, 2024, the Commission mailed to Respondent, by certified mail, an assessment invoice for the July 1, 2024, to June 30, 2025, Fiscal Year (“2024-2025 Fiscal Year”) that was based, in part, on revenues for the 2023 calendar year that Respondent reported to the Commission in its 2023 Assessment Report.

Respondent's assessment was \$368. A copy of the notice of assessment is attached as I&E Exhibit 1.

14. Accompanying the assessment invoice was a notice of assessment that informed Respondent that it was obligated to pay the amount listed on the assessment invoice within thirty (30) days or file objections within fifteen (15) days. A copy of the notice of assessment is attached as I&E Exhibit 2.

15. On or about November 11, 2024, Respondent provided an electronic signature to the United States Postal Service for the certified mailing, which indicated that it received the assessment invoice and notice of assessment for the 2024-2025 Fiscal Year. A copy of the electronic signature for the certified mailing is attached as I&E Exhibit 3.

16. On December 16, 2024, the Commission's Bureau of Administration ("ADM") sent Respondent a letter by first class mail warning Respondent that if it did not pay its 2024-2025 Fiscal Year Assessment within 30 days of receipt of the letter, then ADM would refer the matter to I&E for prosecution.

17. Because Respondent had not paid its outstanding assessment within the timeframe specified in ADM's warning letter, the matter was referred to I&E.

18. On or about March 10, 2025, I&E sent Respondent by first class mail a letter warning Respondent that if it did not pay its 2024-2025 Fiscal Year Assessment within 20 days of receipt of the letter, then I&E would file a Formal Complaint against Respondent seeking payment of the outstanding assessment, a civil penalty, and potential revocation of Respondent's Certificate.

19. The Commission received neither objections nor payment from Respondent to the assessment amount set forth in the 2024-2025 Fiscal Year Assessment Invoice.

20. Respondent failed to pay the amount of the 2024-2025 Fiscal Year Assessment Invoice.

21. The total outstanding assessment balance for Respondent related to the 2024-2025 Fiscal Year is \$368.

### III. VIOLATIONS

#### Count 1

22. That Respondent failed to satisfy its 2024-2025 Fiscal Year Assessments in that it did not pay the amounts due within thirty (30) days of receipt of the invoice. If proven, this is a violation of Section 510(c) of the Public Utility Code, 66 Pa.C.S. § 510(c). I&E's total proposed civil penalty for Count 1 is \$55.<sup>1</sup> This civil penalty, consistent with past Commission decisions,<sup>2</sup> is based on the following factors: (1) the type of violation involved; (2) the amount of Respondent's outstanding assessment balance related to the 2024-2025 Fiscal Years; and (3) Respondent's compliance history with the Public Utility Code and Commission's regulations<sup>3</sup> for three (3) years prior to the filing of this Complaint.

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<sup>1</sup> I&E anticipates that this level of penalty will provide a sufficient deterrent against future violations by Respondent.

<sup>2</sup> *See Pa. Pub. Util. Comm'n v. Moore Family Holdings, LLC*, Docket No. C-2021-3029489 (Order entered April 14, 2022); *Pa. Pub. Util. Comm'n v. Safety 1st Paratransit Inc.*, Docket No. C-2021-3029522 (Order entered April 14, 2022); *Pa. Pub. Util. Comm'n v. JB Jr. Trucking LLC*, Docket No. C-2021-3029458 (Order entered February 24, 2022).

<sup>3</sup> A review of the Commission's records for a period of three (3) years prior to the date of the filing of this Complaint demonstrates that Respondent has an acceptable compliance history with the Commission.

**WHEREFORE**, for all the foregoing reasons, the Pennsylvania Public Utility Commission's Bureau of Investigation and Enforcement respectfully requests that:

- 1) Respondent be ordered to pay a total of \$423, which consists of its outstanding assessment balance of \$368 and a total civil penalty of \$55 for the above-described violations within thirty (30) days of a Commission Final Order. Said payment should be made by certified check or money order, made payable to the "Commonwealth of Pennsylvania" with the docket number of this proceeding listed, and mailed to the Secretary's Bureau of the Commission; and
- 2) If payment of the assessment and civil penalty is not timely made, the Bureau of Investigation and Enforcement requests that:
  - a) The Commission issue an Order to cancel the Certificates of Public Convenience issued to Respondent; and
  - b) The matter be referred to the Pennsylvania Office of Attorney General for appropriate action.

Respectfully submitted,



Grant Rosul  
Prosecutor  
PA Attorney ID No. 308214

Pennsylvania Public Utility Commission  
Bureau of Investigation and Enforcement  
Commonwealth Keystone Building  
400 North Street  
Harrisburg, PA 17120  
(717) 783-5243  
[grosul@pa.gov](mailto:grosul@pa.gov)

Date: July 18, 2025

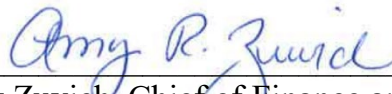
**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission,	:	
Bureau of Investigation and Enforcement	:	
	:	
v.	:	Docket No. C-2025-
	:	
Wellsboro and Corning Railroad Company	:	

**VERIFICATION**

I, Amy Zuvich, Chief of Finance and Assessments, Bureau of Administration, Finance and Assessment Section, hereby state that the facts above set forth are true and correct to the best of my knowledge, information, and belief and that I expect the Bureau will be able to prove the same at any hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa.C.S. § 4904 relating to unsworn falsification to authorities.

Date: July 18, 2025



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Amy Zuvich, Chief of Finance and Assessments  
Finance and Assessment Section  
Bureau of Administration  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street  
Harrisburg, PA 17120

# **I&E Exhibit 1**



Commonwealth of Pennsylvania  
**Pennsylvania Public Utility Commission**  
 Harrisburg, PA 17105-3265  
**GENERAL ASSESSMENTS INVOICE**

Invoice Date	Invoice Number
9/6/2024	24-500047
Fiscal Year	
July 1, 2024 to June 30, 2025	

**PAST DUE**

WELLSBORO & CORNING RAILROAD CO  
 RYAN HART  
 200 MERIDAN CENTER BLVD  
 STE 270  
 ROCHESTER NY 14618

- Read carefully Notice of Assessment
- Use return envelope provided
- Make check payable to:  
**Commonwealth of Pennsylvania**
- If you desire confirmation of receipt, use a mailing service that provides one, such as USPS-Return Receipt, or overnight delivery with receipt confirmation

This is a PAYMENT REMINDER. If you have already submitted this payment, please call 717-265-7548 and do not send payment again.

PUC Assessment	\$368.00
<b>PAY THIS AMOUNT WITHIN 30 DAYS</b>	<b>\$368.00</b>

TO RECEIVE PROPER CREDIT FOR YOUR PAYMENT, REMOVE THE BOTTOM PART OF THIS INVOICE AT THE PERFORATION AND RETURN WITH YOUR REMITTANCE

**MAIL PAYMENT TO:**  
 PA DOR  
 PO BOX 61380  
 HARRISBURG, PA 17106-1380

FOLD AND CUT HERE

RETURN THIS PORTION WITH YOUR REMITTANCE

WELLSBORO & CORNING RAILROAD CO  
 RYAN HART  
 200 MERIDAN CENTER BLVD  
 STE 270  
 ROCHESTER NY 14618

Invoice Date	Invoice Number
9/6/2024	24-500047
Fiscal Year	
July 1, 2024 to June 30, 2025	

**PAST DUE**

<b>PAY THIS AMOUNT WITHIN 30 DAYS</b>	<b>\$368.00</b>
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24000050004761 090624100000368002000000000030000000000 000000368008

# **I&E Exhibit 2**

PENNSYLVANIA PUBLIC UTILITY COMMISSION  
Harrisburg, PA 17120

NOTICE OF ASSESSMENT

EXPLANATION OF INVOICE FOR GENERAL ASSESSMENT  
FOR FISCAL YEAR JULY 1, 2024 TO JUNE 30, 2025

In Section 510 of the Public Utility Code, 66 Pa. C.S. §510, the Pennsylvania General Assembly has authorized the Pennsylvania Public Utility Commission to assess all public utilities a percentage of their gross intrastate operating revenues for the preceding calendar year. Under Section 510, each public utility is required, on or before March 31 of each year to file with the Commission a statement of the utility's gross intrastate operating revenues for the preceding calendar year. After receiving the utilities' statements of gross intrastate operating revenues, the Commission sends general assessment invoices to all public utilities to advise each utility of the amount of assessment that utility owes based upon that utility's activity (gross intrastate operating revenues) in the preceding year. The enclosed assessment is for your proportionate share of the estimated expenses of the Public Utility Commission for the Commission's Fiscal Year July 1, 2024 to June 30, 2025.

**YOU ARE REQUIRED TO PAY THIS INVOICE WITHIN THIRTY DAYS AFTER YOU RECEIVE IT.** Objections to the assessment must be made in writing within 15 days and shall set out in detail the grounds upon which you regard the assessment to be excessive, erroneous, unlawful, or invalid. Objections may be filed only by the person, partnership, or corporation assessed. Filing an objection, however, does not eliminate your obligation to pay the assessment while your objection is being considered. **FAILURE TO PAY THE ASSESSMENT WHEN PAYMENT IS DUE WILL SUBJECT YOU TO PENALTIES.**


Be sure that your personal check or money order is written out in the same amount as your assessment invoice, and make your remittance payable to, "Commonwealth of PA". **DO NOT SEND CASH.** If you have reason to correspond with the Commission regarding your assessment invoice, please refer to your invoice number. A receipt for payment will not be issued. Please mail your payment with the return portion of your invoice in the enclosed self-addressed envelope. Please note that rounding of your assessment to the nearest dollar has occurred. Your assessment for the PUC, including the OCA, OSBA and the DPC where applicable, has been combined into one invoice; one payment for all applicable assessments is acceptable. **A TWENTY DOLLAR (\$20.00) FEE WILL BE CHARGED FOR ALL DISHONORED OR BAD CHECKS REMITTED AS PAYMENT OF ASSESSMENTS.**

Your assessment has been computed by multiplying your gross intrastate operating revenues for the calendar year 2023 by the assessment factor for the public utility group of which you are a member. Your gross intrastate operating revenues for 2023 have been taken from the Assessment Reports Form GAO-23, AR-23-RR or AR-23-MC which you have filed with the Commission, or have been estimated by the Commission if you failed to file a timely report. Gross operating revenue reported to the Commission on the Assessment Reports may have been revised by the Commission to accurately reflect assessable revenue. The assessment factors for the various public utility groups are set forth in Schedule B enclosed herewith.

The approved estimate of expenditures of the Commission for the period July 1, 2024 to June 30, 2025 payable as a General Assessment by the public utilities which the Commission regulates has been determined as follows:

Approved budget for the Commission for the Fiscal Year July 1, 2024 through June 30, 2025:	\$85,953,767
Deduct:	
Pipeline Operators Allocation per Act 127 of 2011	555,082
Various Fees Collected in FY 2023-24	247,436
UGWF Administration per Act 13 of 2012	593,150
Prior Year Cost Saving	7,000,000
UCR Collection for CY 2023	4,945,527
EGS/NGS Allocation per Act 155 of 2014	4,127,586
Total Deductions	<u>\$17,468,781</u>
General Assessment Total Amount	<u>\$68,484,986</u>

The way in which the total Public Utility Commission assessment of \$68,484,986 has been allocated to the various groups of public utilities as shown on Schedules A and B enclosed herewith.



Rosemary Chiavetta  
Secretary  
PA Public Utility Commission

**MAKE INQUIRIES TO:**

Pennsylvania Public Utility Commission  
Bureau of Administrative Services/Assessments  
400 North Street  
Harrisburg, PA 17120

**CONTACT INFORMATION:**

Assessment Section - Telephone 717-265-7548 or e-mail [pucassessments@pa.gov](mailto:pucassessments@pa.gov)

Allocation of Expenses based on percent of prior year Public Utility Group workload  
Budget Fiscal Year 2024-25

**SCHEDULE A**

<b>Group</b>	<b>Total Expenditures per Utility Group Calendar Year 2023</b>	<b>Percentage Distribution</b>	<b>Estimated Expenditures Fiscal Year 2024- 2025 by Utility Group</b>
Electric	\$27,612,324	41.3731%	\$28,334,361
Gas	\$17,603,674	26.3767%	\$18,064,079
Pipeline	\$609,641	0.9135%	\$625,610
Steam Heat	\$344,062	0.5155%	\$353,040
Tele./Tele.	\$4,795,761	7.1858%	\$4,921,194
Water/Sewer	\$9,029,480	13.5294%	\$9,265,608
Transportation - Passenger	\$2,169,076	3.2501%	\$2,225,831
Transportation - Property	\$1,932,948	2.8963%	\$1,983,531
Transportation - Rail	\$2,642,641	3.9596%	\$2,711,732
<b>Total</b>	<b>\$66,739,607</b>	<b>100.0000%</b>	<b>\$68,484,986</b>

**SCHEDULE B**

<b>Group</b>	<b>Estimated Expenditures Fiscal Year 2024-2025 by Utility Group</b>	<b>Gross intrastate revenues by utility group Calendar Year 2023</b>	<b>General Assessment Factor by Utility Group (Col. (a) / by Col. (b))</b>
	(a)	(b)	(c)
Electric	\$28,334,361	\$10,170,871,275	0.002785834196
Gas	\$15,251,742 <sup>(1)</sup>	\$4,325,393,091	0.003526093855
Pipeline	\$625,610	\$15,011,702	0.041674821416
Steam Heat	\$353,040	\$118,150,335	0.002988057545
Tele./Tele.	\$4,921,194	\$1,355,377,086	0.003630867049
Water/Sewer	\$9,265,608	\$1,961,227,681	0.004724391813
Transportation - Passenger	\$2,211,211 <sup>(2)</sup>	\$930,226,799	0.002377066542
Transportation - Property	\$707,620 <sup>(3)</sup>	\$1,389,605,322	0.000509223726
Transportation - Rail	\$2,711,732	\$129,216,058	0.020986029461
<b>Total</b>	<b>\$64,382,118</b>	<b>\$20,395,079,349</b>	<b>0.003156747610</b>

<sup>(1)</sup> Federal reimbursement in the amount of \$2,812,337 is deducted prior to determination of the final FY 2024-25 factor for Gas utilities.

<sup>(2)</sup> Federal reimbursement in the amount of \$14,620 is deducted prior to determination of the final FY 2024-25 factor for Transportation - Passenger utilities.

<sup>(3)</sup> Federal reimbursement in the amount of \$1,275,911 is deducted prior to determination of the final FY 2024-25 factor for Transportation - Property utilities.

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PENNSYLVANIA PUBLIC UTILITY COMMISSION  
Harrisburg, PA 17120

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OFFICE OF CONSUMER ADVOCATE  
NOTICE OF ASSESSMENT

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**EXPLANATION OF INVOICE FOR GENERAL ASSESSMENT FOR PENNSYLVANIA  
OFFICE OF CONSUMER ADVOCATE, OFFICE OF ATTORNEY GENERAL  
FOR FISCAL YEAR JULY 1, 2024 TO JUNE 30, 2025**

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The Pennsylvania Public Utility Commission is mandated under Act 15 of 1977, P.L. 19 as amended by Act 107 of 1978 and Act 25 of 1983, to levy upon the public utilities the Commission regulates a yearly assessment to fund the Pennsylvania Office of the Consumer Advocate (herein called Consumer Advocate), Office of the Attorney General. The Governor and the Appropriation Committees of the Pennsylvania House and Senate approved an estimated operating budget of \$6,752,000 for the Consumer Advocate for the Fiscal Year July 1, 2024 to June 30, 2025.

The enclosed assessment invoice shows your proportionate share of the expenses of the Consumer Advocate for the Fiscal Year July 1, 2024 to June 30, 2025.

**YOU ARE REQUIRED TO PAY THIS INVOICE WITHIN THIRTY DAYS AFTER YOU RECEIVE IT.** Objections to the assessment must be made in writing within 15 days and shall set out in detail the grounds upon which you regard the assessment to be excessive, erroneous, unlawful, or invalid. Objections may be filed only by the person, partnership, or corporation assessed. **FAILURE TO PAY THE ASSESSMENT WHEN PAYMENT IS DUE WILL SUBJECT YOU TO PENALTIES.**

Be sure that your personal check or money order is written out in the same amount as your assessment invoice, and make your remittance payable to, "Commonwealth of PA". **DO NOT SEND CASH.** If you have reason to correspond with the Office of Consumer Advocate regarding your assessment invoice, please refer to your invoice number. Please note that rounding of your assessment to the nearest dollar has occurred. Your assessment for the PUC, including the OCA, OSBA and the DPC where applicable, has been combined into one invoice; one payment for all applicable assessments is acceptable. **A TWENTY DOLLAR (\$20.00) FEE WILL BE CHARGED FOR ALL DISHONORED OR BAD CHECKS REMITTED AS PAYMENT OF ASSESSMENTS.**

Your Consumer Advocate assessment has been computed by multiplying your gross intrastate operating revenues for the calendar year 2023 by the assessment factor for the public utility group of which you are a member. Your gross intrastate operating revenues for 2023 have been taken from the report on Form GAO-23 which you have filed with the Commission, or have been estimated by the Commission, if you failed to file a timely report. Gross operating revenue reported to the Commission on the Assessment Reports may have been revised by the Commission to accurately reflect assessable revenue. The assessment factors for the various public utility groups are set forth in Schedule B enclosed herewith.

Estimate of the expenditures of the Office of Consumer Advocate for the  
Fiscal Year July 1, 2024 through June 30, 2025: \$6,752,000

Deduct:

Credit from previous fiscal year \$242,462

Total OCA Assessment: \$6,509,538

The way in which the total Consumer Advocate assessment of \$6,509,538 has been allocated to the various groups of public utilities as shown on Schedules A and B enclosed herewith.



Rosemary Chiavetta  
Secretary  
PA Public Utility Commission

**MAKE INQUIRIES TO:**

Pennsylvania Public Utility Commission  
Bureau of Administrative Services/Assessments  
400 North Street  
Harrisburg, PA 17120

**CONTACT INFORMATION:**

Assessment Section - Telephone 717-265-7548 or e-mail [pucassessments@pa.gov](mailto:pucassessments@pa.gov)

OFFICE OF CONSUMER ADVOCATE

Allocation of Expenses based on percent of prior year Public Utility Group workload  
Budget Fiscal Year 2024-25

**SCHEDULE A**

<b>Group</b>	<b>Total Expenditures per Utility Group Calendar Year 2023</b>	<b>Percentage Distribution</b>	<b>Estimated Expenditures Fiscal Year 2024- 2025 by Utility Group</b>
Electric	\$1,506,680	24.9975%	\$1,627,222
Gas	\$1,459,731	24.2186%	\$1,576,519
Pipeline	\$0	0.0000%	\$0
Steam Heat	\$0	0.0000%	\$0
Tele./Tele.	\$382,841	6.3518%	\$413,473
Water/Sewer	\$2,678,064	44.4321%	\$2,892,324
<b>Total</b>	<b>\$6,027,316</b>	<b>100.0000%</b>	<b>\$6,509,538</b>

**SCHEDULE B**

<b>Group</b>	<b>Estimated Expenditures Fiscal Year 2024-2025 by Utility Group</b>	<b>Gross intrastate revenues by utility group Calendar Year 2023</b>	<b>General Assessment Factor by Utility Group (Col. (a) / by Col. (b))</b>
	(a)	(b)	(c)
Electric	\$1,627,222	\$10,170,871,275	0.000159988457
Gas	\$1,576,519	\$4,325,393,091	0.000364479937
Pipeline	\$0	\$15,011,702	0.000000000000
Steam Heat	\$0	\$118,150,335	0.000000000000
Tele./Tele.	\$413,473	\$1,355,377,086	0.000305061229
Water/Sewer	\$2,892,324	\$1,961,227,681	0.001474751773
<b>Total</b>	<b>\$6,509,538</b>	<b>\$17,946,031,170</b>	<b>0.000362728558</b>

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PENNSYLVANIA PUBLIC UTILITY COMMISSION  
Harrisburg, PA 17120

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OFFICE OF SMALL BUSINESS ADVOCATE  
DEPARTMENT OF COMMUNITY AND ECONOMIC DEVELOPMENT  
NOTICE OF ASSESSMENT

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EXPLANATION OF INVOICE FOR GENERAL ASSESSMENT  
FOR FISCAL YEAR JULY 1, 2024 TO JUNE 30, 2025

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The Pennsylvania Public Utility Commission is mandated under Act 181 of 1988, to levy upon the public utilities the Commission regulates a yearly assessment to fund the Pennsylvania Office of Small Business Advocate (herein called Small Business Advocate). The Governor and the Appropriation Committees of the Pennsylvania House and Senate approved an estimated operating budget of \$2,243,254 for the Small Business Advocate for the Fiscal Year July 1, 2024 to June 30, 2025.

The enclosed assessment invoice shows your proportionate share of the expenses of the Small Business Advocate for the Fiscal Year July 1, 2024 to June 30, 2025.

**YOU ARE REQUIRED TO PAY THIS INVOICE WITHIN THIRTY DAYS AFTER YOU RECEIVE IT.** Objections to the assessment must be made in writing within 15 days and shall set out in detail the grounds upon which you regard the assessment to be excessive, erroneous, unlawful, or invalid. Objections may be filed only by the person, partnership, or corporation assessed. **FAILURE TO PAY THE ASSESSMENT WHEN PAYMENT IS DUE WILL SUBJECT YOU TO PENALTIES.**

Be sure that your personal check or money order is written out in the same amount as your assessment invoice, and make your remittance payable to, "Commonwealth of PA". **DO NOT SEND CASH.** If you have reason to correspond with the Office of Small Business Advocate regarding your assessment invoice, please refer to your invoice number. Please note that rounding of your assessment to the nearest dollar has occurred. Your assessment for the PUC, including the OCA, OSBA and the DPC where applicable, has been combined into one invoice; one payment for all applicable assessments is acceptable. **A TWENTY DOLLAR (\$20.00) FEE WILL BE CHARGED FOR ALL DISHONORED OR BAD CHECKS REMITTED AS PAYMENT OF ASSESSMENTS.**

Your Small Business Advocate assessment has been computed by multiplying your gross intrastate operating revenues for the calendar year 2023 by the assessment factor for the public utility group of which you are a member. Your gross intrastate operating revenues for 2023 have been taken from the report on Form GAO-23 which you have filed with the Commission, or have been estimated by the Commission, if you failed to file a timely report. Gross operating revenue reported to the Commission on the Assessment Reports may have been revised by the Commission to accurately reflect assessable revenue. The assessment factors for the various public utility groups are set forth in Schedule B enclosed herewith.

Estimate of the expenditures of the Office of Small Business Advocate for  
the Fiscal Year July 1, 2024 through June 30, 2025: \$2,243,254

Deduct:

Credit from previous fiscal year \$273,831

Total Assessment: \$1,969,423

The way in which the total Small Business Advocate assessment of \$1,969,423 has been allocated to the various groups of public utilities as shown on Schedules A and B enclosed herewith.



Rosemary Chiavetta  
Secretary  
PA Public Utility Commission

**MAKE INQUIRIES TO:**

Pennsylvania Public Utility Commission  
Bureau of Administrative Services/Assessments  
400 North Street  
Harrisburg, PA 17120

**CONTACT INFORMATION:**

Assessment Section - Telephone 717-265-7548 or e-mail [pucassessments@pa.gov](mailto:pucassessments@pa.gov)

OFFICE OF SMALL BUSINESS ADVOCATE

Allocation of Expenses based on percent of prior year Public Utility Group workload  
Budget Fiscal Year 2024-25

**SCHEDULE A**

<b>Group</b>	<b>Total Expenditures per Utility Group Calendar Year 2023</b>	<b>Percentage Distribution</b>	<b>Estimated Expenditures Fiscal Year 2024- 2025 by Utility Group</b>
Electric	\$337,063	21.0000%	\$413,579
Gas	\$272,860	17.0000%	\$334,802
Pipeline	\$16,051	1.0000%	\$19,694
Steam Heat	\$16,050	1.0000%	\$19,694
Tele./Tele.	\$64,202	4.0000%	\$78,777
Water/Sewer	\$898,834	56.0000%	\$1,102,877
<b>Total</b>	<b>\$1,605,060</b>	<b>100.0000%</b>	<b>\$1,969,423</b>

**SCHEDULE B**

<b>Group</b>	<b>Estimated Expenditures Fiscal Year 2024-2025 by Utility Group</b>	<b>Gross intrastate revenues by utility group Calendar Year 2023</b>	<b>General Assessment Factor by Utility Group (Col. (a) / by Col. (b))</b>
	(a)	(b)	(c)
Electric	\$413,579	\$10,170,871,275	0.000040663085
Gas	\$334,802	\$4,325,393,091	0.000077403832
Pipeline	\$19,694	\$15,011,702	0.001311909869
Steam Heat	\$19,694	\$118,150,335	0.000166685943
Tele./Tele.	\$78,777	\$1,355,377,086	0.000058121833
Water/Sewer	\$1,102,877	\$1,961,227,681	0.000562340115
<b>Total</b>	<b>\$1,969,423</b>	<b>\$17,946,031,170</b>	<b>0.000109741423</b>

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# **I&E Exhibit 3**

Date Produced: 11/11/2024

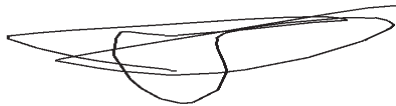
Public Utility Commission:

The following is the delivery information for Certified Mail™ item number 9489 0090 0027 6651 9141 36. Our records indicate that this item was delivered on 11/04/2024 at 11:23 a.m. in ROCHESTER, NY 14618. The scanned image of the recipient information is provided below.

Signature of Recipient :



Address of Recipient :



Thank you for selecting the Postal Service for your mailing needs. If you require additional assistance, please contact your local post office or Postal Service representative.

Sincerely,  
United States Postal Service

The customer reference number shown below is not validated or endorsed by the United States Postal Service. It is solely for customer use.

Customer Reference Number: 0390830 21745740

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission :  
Bureau of Investigation and Enforcement :  
v. : Docket No. C-2025-  
Wellsboro and Corning Railroad Company :

**CERTIFICATE OF SERVICE**

I hereby certify that I am serving the foregoing **Formal Complaint** in the manner and upon the persons listed below, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by party):

**Served via Certified Mail and Electronic Mail**

Wellsboro and Corning Railroad Company  
Attn: Ryan Hart, VP of Finance  
200 Meridan Center Boulevard, Suite 270  
Rochester, NY 14618  
[ryan.hart@gwrr.com](mailto:ryan.hart@gwrr.com)



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Grant Rosul  
Prosecutor  
Bureau of Investigation and Enforcement  
PA Attorney ID No. 318204  
(717) 783-5243  
[grosul@pa.gov](mailto:grosul@pa.gov)

Dated: July 18, 2025