



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

BUREAU OF
INVESTIGATION
&
ENFORCEMENT

October 7, 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.
Energy Center Harrisburg LLC
Docket No. R-2025-3055959
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 'Carrie B. Wright' with a stylized flourish at the end.

Carrie B. Wright
Deputy Chief Prosecutor
Bureau of Investigation and Enforcement
PA Attorney ID No. 208185
(717) 783-6156
carwright@pa.gov

CBW/ac
Enclosures

cc: Administrative Law Judge Steven K. Haas (via email – sthaas@pa.gov)
Administrative Law Judge Charece Z. Collins (via email – charcollin@pa.gov)
Per Certificate of Service

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission	:	
	:	
v.	:	Docket No. R-2025-3055959
	:	
Energy Center Harrisburg LLC	:	

**PREHEARING MEMORANDUM OF THE
BUREAU OF INVESTIGATION AND ENFORCEMENT**

**TO ADMINISTRATIVE LAW JUDGES STEVEN K. HAAS AND CHARECE Z.
COLLINS:**

The Bureau of Investigation and Enforcement (“I&E”) of the Pennsylvania Public Utility Commission (“Commission”) respectfully submits the following Prehearing Memorandum in the above-captioned proceeding.

The Bureau of Investigation and Enforcement Prosecutor in this proceeding will be Carrie B. Wright. Contact information is as follows:

By mail: Carrie B. Wright
Pennsylvania Public Utility Commission
Bureau of Investigation and Enforcement
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17120

By e-mail: carwright@pa.gov

By telephone: (717) 783-6156

I. INTRODUCTION

On July 18, 2025, Energy Center Harrisburg, LLC (“Energy Center Harrisburg,” “ECH,” or “Company”) filed proposed Supplement No. 66 to Tariff Steam – PA PUC No. 4, containing proposed changes in rates, rules and regulations calculated to produce \$894,300 (11.6%) in additional annual revenues, an increase in residential customers’ bills using 8 Mlbs. of steam from \$215 to \$243 per month (13.0%), to become effective on September 16, 2025.

On August 11, 2025, I&E filed its Notice of Appearance. The Office of Small Business Advocate (“OSBA”) filed its Notice of Appearance on August 7, 2025. The Office of Consumer Advocate (“OCA”) filed its Notice of Appearance on August 20, 2025.

On August 28, 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 November 28, 2025, 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.

Pursuant to the Prehearing Conference Order issued on October 1, 2025, a telephonic Prehearing Conference is scheduled on October 8, 2025 at 10:00 a.m. before Administrative Law Judges (“the ALJs”) Steven K. Haas and Charece Z. Collins.

II. ISSUES

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

1. Overall Rate Increase
2. Cost of Service
3. Rate Design
4. Customer Charges
5. Scale Back

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 witness without being limited thereto:

- Ethan Cline, Fixed Utility Valuation Engineer

The I&E witness may be contacted through the information listed above for Ms. Wright. 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 supports the discovery modifications as proposed by the OCA.

VI. SCHEDULE

I&E supports the following schedule. However, I&E will work with the parties and the ALJ to develop a mutually agreeable schedule if the schedule below requires revision.

Event	Dates
Non-Company Direct Testimony	October 22, 2025
Rebuttal Testimony	November 3, 2025 by noon
Surrebuttal Testimony	November 7, 2025
Outline of oral rejoinder due	November 12, 2025 by noon
Evidentiary Hearings	Thursday, November 13 – Friday, November 14, 2025
Main Briefs Due	Friday, December 5, 2025
Reply Briefs Due	Tuesday, December 23, 2025

To the extent that evidentiary hearings will be convened in person, I&E requests that those hearings be held in Harrisburg.

VII. PUBLIC INPUT HEARINGS

To the extent that public input hearings are deemed necessary, I&E proposes the use of telephonic public input hearings to encourage increased participation by ratepayers.

VIII. SERVICE OF DOCUMENTS

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

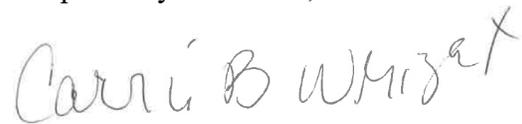
Carrie B. Wright, Esq.
Pennsylvania Public Utility Commission
Bureau of Investigation and Enforcement
Commonwealth Keystone Building
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Harrisburg, PA 17120
carwright@pa.gov

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.

IX. 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 cursive script that reads "Carrie B. Wright".

Carrie B. Wright
Deputy Chief Prosecutor
PA Attorney ID No. 208185

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

Dated: October 7, 2025

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission :
 :
 v. : Docket No. R-2025-3055959
 :
 Energy Center Harrisburg LLC :

CERTIFICATE OF SERVICE

I hereby certify that I am serving the foregoing **Prehearing Memorandum** dated October 7, 2025, in the manner and upon the persons listed below:

Served via Electronic Mail Only

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