



McNees Wallace & Nurick LLC  
100 Pine Street  
P.O. Box 1166  
Harrisburg, PA 17108-1166

**Adeolu A. Bakare**  
Direct Dial: 717.237.5290  
Direct Fax: 717.260.1744  
abakare@mcneeslaw.com

November 20, 2025

Matthew L. Homsher, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street, 2nd Floor  
Harrisburg, PA 17120

**VIA ELECTRONIC FILING**

**RE: Pennsylvania Public Utility Commission v. Wellsboro Electric Company  
Docket No. R-2025-3054392**

Dear Secretary Homsher:

Please find attached for filing with the Pennsylvania Public Utility Commission the Exceptions of Wellsboro Electric Company in the above-referenced proceeding.

As shown by the attached Certificate of Service, all parties to this proceeding are being duly served with a copy of this filing. Thank you.

Very truly yours,

A handwritten signature in black ink, appearing to read 'Adeolu A. Bakare', written over a horizontal line.

Adeolu A. Bakare  
MCNEES WALLACE & NURICK LLC

Counsel to Wellsboro Electric Company

c: Mary D. Long, Administrative Law Judge (via e-mail)  
Certificate of Service

**CERTIFICATE OF SERVICE**

I hereby certify that I have this day served a true copy of the foregoing document upon the participants, listed below, in accordance with the requirements of Section 1.54 (relating to service by a participant).

**VIA EMAIL**

Steven C. Gray, Esq.  
Rebecca Lyttle, Esq.  
Small Business Advocate  
Commonwealth of Pennsylvania  
Office of Small Business Advocate  
Forum Place  
555 Walnut Street, 1st Floor  
Harrisburg, PA 17101  
[sgray@pa.gov](mailto:sgray@pa.gov)  
[relyttle@pa.gov](mailto:relyttle@pa.gov)  
Justin Farr (Discovery)  
[jfarr@energystrat.com](mailto:jfarr@energystrat.com)  
Joe Kubas (Discovery)  
[JKUBAS@pa.gov](mailto:JKUBAS@pa.gov)

Melanie Joy El Atieh, Esq.  
Ryan Morden, Esq.  
Aiden McEvoy, Paralegal  
Office of Consumer Advocate  
555 Walnut Street  
Forum Place, 5th Floor  
Harrisburg, PA 17101  
[OCA25CWV@paoca.org](mailto:OCA25CWV@paoca.org)

Michael Podskoch, Jr., Esq.  
Adam J. Williams, Esq.  
Bureau of Investigation and Enforcement  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
P. O. Box 3265  
Harrisburg, PA 17105-3265  
[mpodskoch@pa.gov](mailto:mpodskoch@pa.gov)  
[adawilliam@pa.gov](mailto:adawilliam@pa.gov)

Zachary Wattles  
Ashley Wattles  
188 Butler Road  
Wellsboro, PA 16901  
[a.wattles@outlook.com](mailto:a.wattles@outlook.com)



---

Adeolu A. Bakare

Counsel to Wellsboro Electric Company

Dated this 20<sup>th</sup> day of November, 2025, in Harrisburg, Pennsylvania.



**TABLE OF CONTENTS**

	<b>Page</b>
I. INTRODUCTION .....	1
II. EXCEPTION .....	3
A. <u>Exception No. 1</u> : To the extent the R.D. indicates that Wellsboro agreed to implement OCA’s recommendation relating to establishing metrics for payment arrangements, the R.D. is in error and should be clarified consistent with the Joint Petition (R.D. at 25-26).....	3
III. CONCLUSION.....	5

## I. INTRODUCTION

On April 30, 2025, Wellsboro Electric Company ("Wellsboro" or "Company") filed with the Pennsylvania Public Utility Commission ("PUC" or "Commission") proposed Supplement No. 162 to Tariff Electric – Pa. P.U.C. No. 8 ("Supplement No. 162"). Supplement No. 162 proposed to increase annual revenues by approximately \$2,899,000 per year, with a proposed effective date of June 29, 2025. In support of this filing, Wellsboro submitted a Statement of Reasons, the supporting information required by 52 Pa. Code § 53.52(a), (b), and (c), and various other information.

The Commission's Bureau of Investigation and Enforcement ("I&E") filed a notice of appearance in this proceeding on May 15, 2025. The Office of Consumer Advocate ("OCA") filed a Formal Complaint in this proceeding on May 12, 2025. The Office of Small Business Advocate ("OSBA") filed a Formal Complaint in this proceeding on May 14, 2025.

By Order entered May 22, 2025, the Commission allowed Supplement No. 162 to be suspended by operation of law until January 29, 2026, and ordered that the Company's rate increase filing and its existing rates, rules, and regulations be investigated. The Commission also ordered that this matter be assigned to the Office of Administrative Law Judge for scheduling of hearings. As a result, the Commission assigned this proceeding to Administrative Law Judge ("ALJ") Mary D. Long. On June 2, 2025, in compliance with the Commission's Order entered on May 22, 2025, Wellsboro filed tariff suspension Supplement No. 163 to Tariff Electric – Pa. P.U.C. No. 8 ("Supplement No. 163"), which suspended proposed Supplement No. 162 until January 29, 2026.

ALJ Long held a Prehearing Conference on June 3, 2025, at which time a litigation schedule was developed.<sup>1</sup>

A telephonic public input hearing was held on August 19, 2025, and an in-person public input hearing was held on August 21, 2025.

During this proceeding, numerous settlement discussions were held among Wellsboro, OCA, OSBA, and I&E (collectively, "Parties"). As a result of those discussions, ALJ Long was notified that a settlement-in-principle was reached among the Parties. Evidentiary hearings were held on September 4, 2025, to establish the record and to make witnesses available for cross-examination. As with the Prehearing Conference, the evidentiary hearings were held jointly for the Citizens', Wellsboro, and Valley rate proceedings. Evidence was admitted but there was no cross-examination for Wellsboro. No briefs were filed in this proceeding. A Joint Petition for Settlement ("Settlement Agreement") was submitted by the Parties on October 17, 2025.

On November 13, 2025, ALJ Long issued a Recommended Decision ("R.D.") in this proceeding. In the R.D., ALJ Long approved the Settlement Agreement and authorized the rate increase agreed upon by the Parties.

Wellsboro generally supports the R.D. and requests that the Commission approve the terms of the Settlement Agreement. However, Wellsboro files this limited Exception

---

<sup>1</sup> The Prehearing Conference was held jointly with rate cases filed by Citizens' Electric Company of Lewisburg, PA ("Citizens") and Valley Energy, Inc. ("Valley") (collectively with Wellsboro, "Companies") at Docket Nos. R-2025-3054394 and R-2025-3054393, respectively. On June 5, 2025, ALJ Long issued a Prehearing Order, in which she granted a motion to consolidate the three base rate cases for the purposes of discovery and litigation.

to the R.D. to address an apparent misstatement concerning the terms of the Settlement Agreement and the Company's obligations thereunder. The Company respectfully requests that the Commission grant this Exception and approve the R.D. as clarified herein.

## II. EXCEPTION

- A. **Exception No. 1: To the extent the R.D. indicates that Wellsboro agreed to implement OCA's recommendation relating to establishing metrics for payment arrangements, the R.D. is in error and should be clarified consistent with the Joint Petition. (R.D. at 25-26).**

The R.D. addresses payment arrangements for customers with difficulty paying their bills on pages 25-26. It states, in relevant part:

OCA Witness Wise also examined how Wellsboro administers payment plans for customers who have difficulty paying their bills. In her analysis, Ms. Wise found that the payment arrangements were determined by the customer's ability to pay, the customer's payment history, income level, and the length of time of the bill accumulated. However, Ms. Wise expressed concern that the Company does not track the success of its payment arrangements, and therefore it is difficult to determine whether the plans are achieving their intended goals, like improving customer repayment rates and minimizing delinquencies. She suggested that Wellsboro establish metrics for measuring success for payment plans and to document payment plan policies.

In the Joint Petition, Wellsboro agreed to implement OCA's recommendation. The Company states that this settlement term addresses customer service concerns raised by OCA and will result in more detailed records of payment plans.

The Company is concerned that the above statement does not correctly reflect the agreement between Wellsboro, OCA, and the other Parties in the Settlement Agreement. In the Settlement Agreement, Wellsboro agreed to "establish written internal operating procedures addressing how Federal Poverty Income Guideline ranges are used, what verification is needed for low-income verification, and how payment terms are calculated."

Settlement Agreement at 7. However, in addressing OCA's concerns, Wellsboro did not agree to the entirety of OCA's recommendation on the payment arrangements topic and, in particular, did not agree to any provisions concerning tracking or metrics of payment plan outcomes. *See generally* Settlement Agreement. Rather, the Company agreed to establish written internal operating procedures on specified topics.

In contrast, the Non-Unanimous Joint Petition for Settlement in Citizens' rate case proposes an additional provision on tracking of payment arrangement outcomes, and that provision was recommended for approval by the ALJ in that proceeding.<sup>2</sup> However, as a result of settlement discussions occurring between the Parties in the Wellsboro proceeding, no tracking provision was included in the Wellsboro Settlement Agreement. Accordingly, the R.D.'s statement that "Wellsboro agreed to implement OCA's recommendation" overstates the agreed upon terms in the Joint Petition. R.D. at 25. Rather, it should note that the Company agreed to document a payment arrangement procedure as specified in the Settlement Agreement.

Accordingly, Wellsboro respectfully requests that the Commission adopt the R.D.'s recommendation to approve the Joint Petition, but clarify the language in its Final Order to accurately reflect the language of the Settlement Agreement reached between the Parties relative to Wellsboro's agreement to develop written internal procedures for customer payment arrangements.

---

<sup>2</sup> Citizens' Non-Unanimous Joint Petition for Settlement provided for specific tracking categories to track the results of payment plans. *See* Recommended Decision, Docket No. R-2025-3054394 (Nov. 13, 2025), at 10; Non-Unanimous Joint Petition for Settlement, Docket No. R-2025-3054394 (Sept. 26, 2025), at 8.

### III. CONCLUSION

**WHEREFORE**, Wellsboro Electric Company respectfully requests that the Pennsylvania Public Utility Commission grant this Exception, approve the Company's recommendations therein, and otherwise adopt the Recommended Decision.

Respectfully submitted,

McNEES WALLACE & NURICK LLC



By \_\_\_\_\_  
Adeolu A. Bakare (P.A. I.D. No. 208541)  
Matthew L. Garber (P.A. I.D. No. 322855)  
Rebecca Kimmel (P.A. I.D. No. 335097)  
Victoria A. Geddis (P.A. I.D. No. 335500)  
100 Pine Street  
P.O. Box 1166  
Harrisburg, PA 17108-1166  
Phone: (717) 232-8000  
Fax: (717) 260-1744  
abakare@mcneeslaw.com  
mgarber@mcneeslaw.com  
rkimmel@mcneeslaw.com  
vgeddis@mcneeslaw.com

Pamela C. Polacek (PA I.D. No. 78276)  
C&T Enterprises, Inc.  
P.O. Box 129  
Venetia, PA 15367  
Phone: (570) 724-9469  
Fax: (570) 724-3996  
ppolacek@ctenterprises.org

*Counsel to Wellsboro Electric Company*

Dated: November 20, 2025