



COMMONWEALTH OF PENNSYLVANIA

July 9, 2026

E-FILED

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

Re: Petition of Pike County Light & Power Company for Approval of Default Service Plan for the Period June 1, 2027 to May 30, 2030, Advanced Metering Infrastructure Surcharge, and Waiver of Commission Regulations / Docket Nos. P-2026-3062915 & P-2026-3062916

Dear Secretary Homsher:

Enclosed for filing please find the Prehearing Memorandum, on behalf of the Office of Small Business Advocate (“OSBA”), in the above-referenced proceedings.

Copies will be served on all known parties in these proceedings, as indicated on the attached Certificate of Service.

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

Sincerely,

/s/ Steven C. Gray

Steven C. Gray
Senior Attorney
Assistant Small Business Advocate
Attorney ID No. 77538

Enclosures

cc: Maksim Malukoff
Mark D. Ewen
Parties of Record

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of Pike County Light & Power :
Company for Approval of Default Service : **Docket Nos. P-2026-3062915**
Plan for the Period June 1, 2027 to : **P-2026-3062916**
May 30, 2030, Advanced Metering :
Infrastructure Surcharge, and Waiver of :
Commission Regulations :

**PREHEARING MEMORANDUM
OF THE OFFICE OF SMALL BUSINESS ADVOCATE**

I. INTRODUCTION

The Office of Small Business Advocate (“OSBA”) is authorized to represent the interests of small business customers of utility services before the Pennsylvania Public Utility Commission (“Commission”) pursuant to the provisions of the Small Business Advocate Act, Act 181 of 1988, 73 P.S. §§ 399.41 – 399.50 (“the Act”). To discharge this statutory duty, the Small Business Advocate deems it necessary to participate as a party in these proceedings. Representing the OSBA in the above-referenced matters is Assistant Small Business Advocate Steven C. Gray. Please address all correspondence in these matters as follows:

Steven C. Gray, Esq.
Senior Attorney
Assistant Small Business Advocate
Office of Small Business Advocate
Forum Place
555 Walnut Street, 1st Floor
Harrisburg, PA 17101
sgray@pa.gov

II. FILING BACKGROUND

On June 1, 2026, Petition of Pike County Light & Power Company for Approval of Default Service Plan for the Period June 1, 2027 through May 31, 2030, Advanced Metering Infrastructure Surcharge, and Waiver of Commission Regulations with the Commission.

The OSBA filed Notice of Interventions in these proceedings on July 7, 2026.

III. IDENTIFICATION OF WITNESSES AND TENTATIVE ISSUES

Assisting in the development and presentation of the OSBA's case in these proceedings will be:

Mark Ewen
Industrial Economics, Incorporated
2067 Massachusetts Avenue
Cambridge, MA 02140
MEwen@indecon.com

Maksim Malukoff
Industrial Economics, Incorporated
2067 Massachusetts Avenue
Cambridge, MA 02140
MMalukoff@indecon.com

The OSBA will participate in these proceedings to ensure that the interests of Pike's small business customers are adequately represented and protected.

After an initial review of the materials submitted by Pike, the OSBA has identified the following list of issues that it will evaluate in these proceedings:

- 1) Whether Pike's default service plan ("DSP") is consistent with sound economics and regulatory policy, and fairly treats small business customers;
- 2) Whether Pike's approach to procuring alternative energy certificates ("AECs") is reasonable;

- 3) Whether Pike's financial hedging program is structured properly and serving to reduce price volatility at reasonable cost;
- 4) Whether Pike's default service rates are appropriately calculated and accurately reconciled;
- 5) Whether Pike's request for certain waivers of regulatory requirements is reasonable; and
- 6) Whether Pike's request to implement a surcharge for deployment of advanced metering technology ("AMI" or "smart meters") is reasonable.

The OSBA reserves the right to address additional issues as they arise throughout these proceedings.

IV. SERVICE OF DOCUMENTS

In accordance with 52 Pa. Code § 1.54(b)(3)(i), the OSBA agrees to accept electronic mail delivery of documents on the due date¹ as satisfying the in-hand requirement. The OSBA requests that email delivery of documents also be provided to its witnesses identified above.

In addition to email copies of pleadings, briefs, and exceptions, the OSBA requests email copies of responses to discovery propounded by the OSBA or any other party.

V. SETTLEMENT

The OSBA notes its willingness to enter settlement discussions at the appropriate phase of these proceedings.

VI. DISCOVERY

The OSBA does not propose any discovery modifications in these proceedings.

¹ In accordance with 52 Pa. Code § 1.56(a)(5), documents must be received by 4:30 pm.

VII. HEARING AND BRIEFING SCHEDULE

At the time of this writing, the parties are working on a proposed procedural schedule.

Respectfully submitted,

/s/ Steven C. Gray

Steven C. Gray
Senior Attorney
Assistant Small Business Advocate
Attorney ID No. 77538

Commonwealth of Pennsylvania
Office of Small Business Advocate
Forum Place
555 Walnut Street, 1st Floor
Harrisburg, PA 17101

Dated: July 9, 2026

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CERTIFICATE OF SERVICE

I hereby certify that true and correct copies of the foregoing have been served via email (*unless otherwise noted below*) upon the following persons, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

The Honorable Gail Chiodo
Administrative Law Judge
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Date: July 9, 2026

/s/ Steven C. Gray
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Senior Attorney
Assistant Small Business Advocate
Attorney ID No. 77538