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August 28, 2026

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

VIA E-FILING

**RE: Rulemaking to Further Amend the Provisions of 52 Pa. Code Chapter 52;
Docket No. L-2025-3058767**

Dear Secretary Homsher:

Enclosed for filing with the Pennsylvania Public Utility Commission ("PUC" or "Commission") are the Comments of Citizens' Electric Company of Lewisburg, PA, Wellsboro Electric Company and Valley Energy, Inc., on the Notice of Proposed Rulemaking Order in the above-referenced proceeding.

This filing has been served via email on the parties listed on the attached Certificate of Service. If you have any questions regarding this filing, please feel free to contact the undersigned. Thank you.

Very truly yours,

Pamela C. Polacek

By

Pamela C. Polacek

Counsel to Citizens' Electric Company of Lewisburg, PA,
Wellsboro Electric Company and Valley Energy, Inc.

Enclosure

c: Stephanie A. Wilson, Esq., Law Bureau (stepwilson@pa.gov)
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PENNSYLVANIA PUBLIC UTILITY COMMISSION

Rulemaking to Further Amend the Provisions of
52 Pa. Code Chapter 56

: Docket No. L-2025-3058767

**COMMENTS OF CITIZENS' ELECTRIC COMPANY OF
LEWISBURG, PA, WELLSBORO ELECTRIC COMPANY
AND VALLEY ENERGY, INC
TO FEBRUARY 19, 2026 NOTICE OF PROPOSED RULEMAKING ORDER**

On February 19, 2026, the Pennsylvania Public Utility Commission's ("PUC" or "Commission") issued a Notice of Proposed Rulemaking Order to Further Amend the Provisions of 52 Pa. Code Chapter 56, Docket No. L-2025-3058767 ("NOPR Order"), which seeks to incorporate the provisions of the former Chapter 14 of the Public Utility Code into the Chapter 56 regulations. Citizens' Electric Company of Lewisburg, PA ("Citizens"), Wellsboro Electric Company ("Wellsboro") and Valley Energy, Inc. ("Valley") (collectively, the "C&T Utilities") hereby submit these Comments.

The former Chapter 14 (66 Pa.C.S. §§ 1401-1419) was an important tool enacted by the General Assembly to balance the needs of utilities and consumers. In Chapter 14, the General Assembly further considered the interests of consumers, recognizing that a balance must be struck among those who regularly pay their bills, those who face hardships that make payment difficult and those who could pay but choose to abuse the system. Chapter 14 expired on December 31, 2024, due to a sunset provision. The C&T Utilities have continued to apply the provisions of Chapter 14 while addressing payment arrangements, terminations and other issues that arise. We support the Commission's initiative to adopt regulations mirroring the provisions of Chapter 14 to provide regulatory certainty to all stakeholders.

The C&T Utilities also support Chairman DeFrank's articulated goal of reenacting the consumer protections without material changes so this matter can be expeditiously addressed. The proposed regulations strike an appropriate balance among the various stakeholder interests. To the extent the Commission intends to entertain changes, the C&T Utilities urge the Commission to consider enhancements to ensure that customer abuse of the Chapter 56 system is curtailed. For example, the Commission could enhance the enforcement of the requirement within proposed Section 56.181 that consumers pay current bills while a complaint is pending. This would help to mitigate the increasing arrearages that can accrue during a pending informal or formal complaint.

Respectfully submitted,

Pamela C. Polacek

By _____

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Date: August 28, 2026