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August 18, 2020

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

VIA ELECTRONIC FILING
AND E-MAIL

**RE: Emergency Order Re: Establishing Public Utility Service Termination Moratorium;
Docket No. M-2020-3019244**

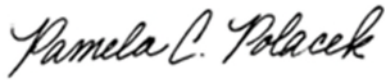
Dear Secretary Chiavetta:

Attached for filing with the Pennsylvania Public Utility Commission ("Commission") are the Comments of Citizens' Electric Company of Lewisburg, PA ("Citizens"), Wellsboro Electric Company ("Wellsboro") and Valley Energy, Inc. ("Valley") (collectively, the "C&T Companies") to Chairman Dutrieuille's Letter of August 10, 2020, in the above-referenced proceeding.

As shown by the attached Certificate of Service, all parties to these proceedings are being duly served via email only due to the current COVID-19 pandemic. Upon lifting of the aforementioned Emergency Order, we can provide parties with a hard copy. Thank you.

Sincerely,

McNEES WALLACE & NURICK LLC

By 
Pamela C. Polacek

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

CERTIFICATE OF SERVICE

I hereby certify that I am this day serving a true copy of the foregoing document upon the participants listed below in accordance with the requirements of 52 Pa. Code Section 1.54 (relating to service by a participant).

VIA E-MAIL

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Pamela C. Polacek

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

Dated this 18th day of August, 2020 at Harrisburg, Pennsylvania

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Emergency Order Re: Establishing Public Utility :
Service Termination Moratorium : Docket No. M-2020-3019244

**COMMENTS OF CITIZENS' ELECTRIC COMPANY OF LEWISBURG, PA,
WELLSBORO ELECTRIC COMPANY AND VALLEY ENERGY, INC.,
TO CHAIRMAN DUTRIEUILLE'S LETTER OF AUGUST 10, 2020**

I. INTRODUCTION & COMMENTS

On August 10, 2020, Pennsylvania Public Utility Commission ("PUC" or "Commission") Chairman Gladys Brown Dutrieuille issued a letter requesting comments at the above-captioned docket. The Chairman's letter requests input on when and how to lift the termination moratorium that was enacted by the Commission at the inception of the COVID-19 pandemic. Citizens' Electric Company of Lewisburg, PA ("Citizens"), Wellsboro Electric Company ("Wellsboro") and Valley Energy, Inc. ("Valley") (collectively, the "C&T Companies"), hereby provide these Comments. The C&T Companies also support the Comments submitted by the Energy Association of Pennsylvania ("EAP").

As noted in the C&T Companies' June 12, 2020, responses to the data requests at Docket No. M-2020-3020055, Citizens', Wellsboro and Valley have experienced increases in the number of delinquent accounts for both residential and non-residential customers in comparison to prior years. While the Emergency Order is prohibiting termination, the arrearages for many of the accounts continue to grow without the customers seeking payment arrangements. Some of those arrearages accrued prior to the Governor's Emergency Declaration in March 2020 and were subject

to the 2019-2020 winter moratorium, which was extended by the Emergency Order. The C&T Companies recognize the financial struggles that many customers are facing due to the COVID-19 pandemic; however, the accumulation of large arrearages without good faith efforts to apply for a payment arrangement or to make partial payments is not in the public interest.

Citizens', Wellsboro and Valley have collectively been reaching out to their customers during the COVID-19 pandemic to offer help to those customers struggling to pay their utility bills during this crisis. Those efforts have included general outreach to all customers through newspapers, radio, websites, social media and newsletters. The C&T Companies also have attempted targeted outreach to customers with arrearages through mailings and phone calls. All of these steps have been completed in an effort to provide information regarding help that may be available for customers experiencing hardships as a result of COVID-19. Without a definitive moratorium end-date, there has been minimal response from customers to discuss available payment options and to take advantage of potential hardship funds.

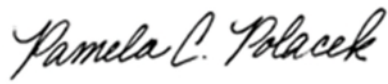
The C&T Companies urge the Commission to adopt an order to end the moratorium as this will afford us more opportunities to engage in meaningful dialog with our customers who are continuing to struggle. It is important that we take this step now to help bring customers into the conversation and to avert ever-increasing levels of arrearages. Without a clear chance to work with us before the onset of the normal winter moratorium, customers may face a highly burdensome debt by Spring 2021. In addition, our other customers will be exposed to ever-increasing risk of absorbing these arrearages. As always, we will continue to work with customers to the maximum extent possible and will pursue terminations only as a last resort. All existing customer protections regarding collections, payment arrangements, and terminations will remain in place.

II. CONCLUSION

For the reasons explained above, Citizens', Wellsboro and Valley respectfully request that the Commission adopt an Order at the August 27, 2020, Public Meeting restoring the collections process, including terminations, authorized under the Public Utility Code and the Commission's regulations effective September 1, 2020, for all classes of customers.

Respectfully submitted,

McNEES WALLACE & NURICK LLC

By 

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Dated: August 18, 2020