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September 11, 2020

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

VIA ELECTRONIC FILING

**RE: Joint Default Service Plan for Citizens' Electric Company of Lewisburg, PA and
Wellsboro Electric Company For the Period June 1, 2021 through May 31, 2025
Docket Nos. P-2020-3019383 and P-2020-3019384**

Dear Secretary Chiavetta:

Enclosed for filing with the Pennsylvania Public Utility Commission is the Motion for Admission of Testimony and Exhibits on behalf of Citizens' Electric Company of Lewisburg, PA and Wellsboro Electric Company in the above-referenced proceeding.

As shown by the attached Certificate of Service and per the Commission's March 20, 2020, Emergency Order, all parties to this proceeding 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 of this document upon request.

Very truly yours,

McNEES WALLACE & NURICK LLC

By 
Adeolu A. Bakare

Counsel to Citizens' Electric Company of
Lewisburg, PA and Wellsboro Electric Company

c: Administrative Law Judge Benjamin J. Myers (via email)
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 52 Pa. Code § 1.54 (relating to service by a participant).

VIA E-MAIL

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Adeolu A. Bakare

Counsel to Citizens' Electric Company of
Lewisburg PA and Wellsboro Electric Company

Dated this 11th day of September, 2020, at Harrisburg, Pennsylvania

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Joint Default Service Plan for Citizens'	:	
Electric Company of Lewisburg, PA and	:	Docket Nos.: P-2020-3019383
Wellsboro Electric Company for the Period	:	P-2020-3019384
of June 1, 2021 Through May 31, 2025	:	

**MOTION FOR ADMISSION
OF TESTIMONY AND EXHIBITS**

TO THE HONORABLE BENJAMIN MYERS, ADMINISTRATIVE LAW JUDGE:

The undersigned move for admission into the evidentiary record of the statements and exhibits identified in the Stipulation for Admission of Testimony and Exhibits ("Stipulation") attached hereto as Appendix A. This Motion and the Stipulation are being submitted in conjunction with the settlement-in-principle reached between Citizens' Electric Company of Lewisburg, PA, Wellsboro Electric Company, the Office of Consumer Advocate, and the Office of Small Business Advocate ("Parties"), the Parties' waiver of cross-examination, and the directives from Administrative Law Judge Benjamin Myers to file a Stipulation for Admission of Testimony and a Joint Petition for Settlement on or before September 11, 2020.

Pursuant to the ALJ's directive, the Parties to this proceeding have stipulated the authenticity of the statements and exhibits listed therein and have waived cross-examination of the witnesses sponsoring those statements and exhibits, subject only to contingencies in the pending Joint Petition for Settlement reserving litigation rights in the event the Commission rejects the Settlement.

Accordingly, the parties request that the Administrative Law Judge grant this Motion and admit into the evidentiary record such statements and exhibits. A copy of the statements and exhibits listed in the Stipulation will be filed with the Secretary of the Commission after this Motion is granted.

Respectfully submitted:

Dated: September 11, 2020



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/s/ Daniel Asmus

Daniel Asmus

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Counsel for Office of Small Business Advocate

APPENDIX A

**STIPULATION FOR ADMISSION
OF TESTIMONY AND EXHIBITS**

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Joint Default Service Plan for Citizens'	:	
Electric Company of Lewisburg, PA and	:	Docket Nos.: P-2020-3019383
Wellsboro Electric Company for the Period	:	P-2020-3019384
of June 1, 2021 Through May 31, 2025	:	

**STIPULATION FOR ADMISSION
OF TESTIMONY AND EXHIBITS**

The undersigned, being all of the active parties to this proceeding: (1) hereby stipulate the authenticity of the Statements and Exhibits listed in Attachment 1 (the "Listed Statements and Exhibits"), which were previously served upon all parties in this proceeding and upon the presiding Administrative Law Judge; (2) acknowledge and agree that they waive cross-examination with respect to the Listed Statements and Exhibits subject to the exception stated in the Joint Petition if the Commission were to reject the Settlement; and (3) further stipulate that the Listed Statements and Exhibits should be admitted into the record in this case.

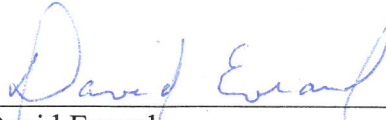
Accordingly, this Stipulation for Admission of Testimony and Exhibits are hereby submitted.

Respectfully:

Dated: September 11, 2020



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**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**JOINT DEFAULT SERVICE PLAN FOR CITIZENS' ELECTRIC COMPANY
OF LEWISBURG, PA AND WELLSBORO ELECTRIC COMPANY FOR THE PERIOD
OF JUNE 1, 2021 THROUGH MAY 31, 2025;
DOCKET NOS. P-2020-3019383 AND P-2020-3019384**

ATTACHMENT 1

STATEMENTS AND EXHIBITS FOR ADMISSION INTO THE EVIDENTIARY RECORD

Party	Witness	Direct Testimony/Exhibits	Supplemental Direct Testimony / Exhibits
Citizens'/ Wellsboro	Byron Farnsworth	Citizens'/Wellsboro St. No. 1 Exhibit ___ (BF-1) Exhibit ___ (BF-2)	Citizens'/Wellsboro St. No. 1-R
Citizens'/ Wellsboro	John Kelchner	Citizens'/Wellsboro St. No. 2 Exhibit ___ (JK-1) Exhibit ___ (JK-2) Exhibit ___ (JK-3)	Citizens'/Wellsboro St. No. 2-R
Citizens'/ Wellsboro	Melissa Sullivan	Citizens'/Wellsboro St. No. 3 Exhibit ___ (MS-1) Exhibit ___ (MS-2)	Citizens'/Wellsboro St. No. 3-R
OCA	Serhan Ogur	OCA St. No. 1 Appendix	
OSBA	Brian Kalcic	OSBA St. No. 1 Appendix	