


COMMONWEALTH OF PENNSYLVANIA



OFFICE OF CONSUMER ADVOCATE

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December 29, 2020

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

Re: Petition of Pike County Light and Power Company
for Approval of Default Service Plan (DSP) and
Waiver of Commission Regulations and *Nunc Pro
Tunc* Treatment for the Period June 1, 2021 through
May 31, 2024
Docket No. P-2020-3022988

Dear Secretary Chiavetta:

Attached for electronic filing please find the Office of Consumer Advocate's Notice of Intervention and Public Statement in the above-referenced proceeding.

Copies have been served per the attached Certificate of Service.

Respectfully submitted,

/s/ David T. Evrard

David T. Evrard
Assistant Consumer Advocate
PA Attorney I.D. # 33870
E-Mail: DEvrard@paoca.org

Enclosures:

cc: The Honorable Eranda Vero (**email only**)
Certificate of Service

*301319

CERTIFICATE OF SERVICE

Re: Petition of Pike County Light and Power Company :
for Approval of Default Service Plan (DSP) and :
Waiver of Commission Regulations and *Nunc Pro* : Docket No. P-2020-3022988
Tunc Treatment for the Period June 1, 2021 through :
May 31, 2024 :

I hereby certify that I have this day served a true copy of the following document, the Office of Consumer Advocate's Notice of Intervention and Public Statement, upon parties of record in this proceeding in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant), in the manner and upon the persons listed below:

Dated this 29th day of December 2020.

SERVICE BY E-MAIL ONLY

Richard A. Kanaskie, Esquire
Bureau of Investigation & Enforcement
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor
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Office of Small Business Advocate
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Energy Services Provider Inc.
3700 Lakeside Drive
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Miramar, FL 33027

Conedison Solutions Inc.
100 Summit Lake Drive
Suite 410
Valhalla, NY 10595-1373

Direct Energy Services, LLC.
1001 Liberty Avenue
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/s/ David T. Evrard

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Phone: (717) 783-5048
Fax: (717) 783-7152
Dated: December 29, 2020
*301390

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Petition of Pike County Light and Power Company :
for Approval of Default Service Plan (DSP) and :
Waiver of Commission Regulations and *Nunc Pro* : Docket No. P-2020-3022988
Tunc Treatment for the Period June 1, 2021 through :
May 31, 2024 :

NOTICE OF INTERVENTION
OF THE
OFFICE OF CONSUMER ADVOCATE

Pursuant to 52 Pa. Code §§ 5.71-74, the Office of Consumer Advocate hereby gives Notice of Intervention in the above-captioned proceeding. A copy of all correspondence and notices, documents, orders or other communications with respect to the above-captioned proceeding should be addressed to the following:

David T. Evrard
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Aron J. Beatty
Senior Assistant Consumer Advocate
Office of Consumer Advocate
555 Walnut Street
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Respectfully Submitted,

/s/ David T. Evrard
David T. Evrard
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Dated: December 29, 2020
*301318

PUBLIC STATEMENT OF THE OFFICE OF CONSUMER ADVOCATE
PURSUANT TO 71 P.S. SECTION 309-4(e)

Act 161 of the Pennsylvania General Assembly, 71 P.S. Section 309-2, as enacted July 9, 1976, authorizes the Consumer Advocate to represent the interests of consumers before the Pennsylvania Public Utility Commission (Commission). In accordance with Act 161, and for the following reasons, the Acting Consumer Advocate determined to file an Answer and Intervene in the proceedings before the Commission involving Pike County Light and Power Company (Pike or the Company).

On November 23, 2020, Pike filed its Petition for Approval of Default Service Plan for the Period June 1, 2021 through May 31, 2024 pursuant to 66 Pa. C.S. § 2807(e) of the Pennsylvania Public Utility Code, the Commission's Default Service Regulations and the Commission's Policy on Default Service. Due to its small size in both number of customers and load, Pike proposes to acquire supply for residential customers primarily through spot market purchases from the New York Independent System Operator. To reduce the price volatility of its spot purchases, Pike proposes to utilize a financial hedging strategy for a portion of its default supply. This will entail the use of financial products (energy swaps) which will convert hourly priced electricity to fixed price electricity. The Company also proposes to meet its Alternative Energy Portfolio Standards Act requirements through a competitive solicitation process.

The Acting Consumer Advocate has determined to intervene in this proceeding to protect the interests of Pike's residential customers. The Acting Consumer Advocate will seek to ensure that the Plan meets the requirements of Act 129 of 2008 (providing, *inter alia*, for default service procurement) and that any rates that result from this proceeding are just and reasonable, consistent with Pennsylvania law.