



Thomas J. Sniscak
(717) 236-1300 x224
tjsniscak@hmslegal.com

Whitney E. Snyder
(717) 236-1300 x260
wesnyder@hmslegal.com

100 North Tenth Street, Harrisburg, PA 17101 Phone: 717.236.1300 Fax: 717.236.4841 www.hmslegal.com

January 4, 2021

VIA ELECTRONIC FILING

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

Re: Pike County Light and Power Company; Docket No. P-2020-3022988;
**PIKE COUNTY LIGHT & POWER COMPANY'S PREHEARING
CONFERENCE MEMORANDUM**

Dear Secretary Chiavetta:

Enclosed for filing with the Commission is the Petition of Pike County Light & Power Company's Prehearing Conference Memorandum in the above-captioned proceeding. Copies have been served in accordance with the attached Certificate of Service.

Should you have any questions or comments, please feel free to contact me directly.

Very truly yours,

/s/Whitney E. Snyder

Thomas J. Sniscak
Whitney E. Snyder

TJS/WES/das
Enclosure

cc: Russel Miller, Vice President-Energy Supply & Business Development
Per Certificate of Service

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of Pike County Light & Power :
Company for Approval of Extension of :
Default Service Plan and Waiver of : Docket No. P-2020-3022988
Commission Regulations :

**PIKE COUNTY LIGHT & POWER COMPANY'S
PREHEARING CONFERENCE MEMORANDUM**

TO: THE HONORABLE ERANDA VERO:

Pursuant to 52 Pa. Code § 5.222(d), Pike County Light & Power Company (Pike) submits this Prehearing Conference Memorandum.

I. Presently Identified Issues

The major issue in this proceeding is approval of a financial hedging strategy to allow Pike to reduce price instability for its default service customers. Pike only currently has one supply procurement method available to it – spot market purchases through the New York Independent Operator System (NYISO). In past Pike DSP proceedings, the Commission has approved and the Commonwealth Court has upheld this procurement method. In Pike's last DSP proceeding, Pike proposed for the first time a financial hedging strategy. The parties settled upon and the Commission approved a financial hedging strategy for plan years 2019-2021. Pike is proposing essentially the same financial hedging strategy here. Approval of Pike's DSP and financial hedging strategy also involve waivers of Commission regulations that the Commission has consistently approved in prior DSP proceedings for Pike. Issues regarding electric generation suppliers and communication of information to those suppliers have been resolved via separate petition proceeding.

II. Names and Addresses of Witnesses and Area of Testimony

Pike submitted its Direct Testimony on December 24, 2020 before 11:00 A.M. This testimony included the following witnesses who each testified in support of Pike's procurement methodology and proposed hedging strategy.

Russell Miller
Corning Natural Gas Holding Corporation
330 West William St.
Corning, NY 14830

Noel Chesser
1414 Key Highway
Suite 200 M
Baltimore, MD 21230

III. Proposed Procedural Schedule

Pike proposes the following procedural schedule, which it sent to the OCA, OSBA, and I&E on December 30, 2020. Pike has not yet heard back from the parties on this proposal.

Pike Direct	12/24/2020
Other Parties Direct	1/12/2021
Rebuttal	1/19/2021
Surrebuttal	1/26/2021
Rejoinder Outlines	2/3/2021
Hearings	2/4/2021
Close of Record Date	2/4/2021
Main Briefs Due	2/14/2021
Reply Briefs Due	2/24/2021

IV. Discovery Modifications

Pike is willing to work with the other parties regarding modifications to the Commission's discovery timelines.

V. Protective Order

Pike's direct testimony included highly confidential information regarding its proposed hedging strategy. Pike sent a proposed protective order to OCA, I&E, and OSBA on December 28, 2020. Pike has not yet heard back from the parties on this proposal.

Respectfully submitted,

/s/Whitney E. Snyder

Thomas J. Sniscak, Esquire
Whitney E. Snyder, Esquire
Hawke McKeon & Sniscak LLP
100 North Tenth Street
Harrisburg, PA 17101
Phone: 717-236-1300
tjsniscak@hmslegal.com
wesnyder@hmslegal.com

Date: January 4, 2021

Attorneys for Pike County Light & Power Co.

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true and correct copy of the foregoing document upon the parties, listed below, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a party) and the Commission's March 26, 2020 COVID-19 Suspension Emergency Order.

VIA ELECTRONIC MAIL ONLY

Aron J. Beatty, Esq.
David T. Evrard, Esq.
Office of Consumer Advocate
555 Walnut Street
5th Floor Forum Place
Harrisburg, PA 17101
abeatty@paoca.org
devrard@paoca.org

John R. Evans, Esq.
Office of Small Business Advocate
555 Walnut Street
1st Floor Forum Place
Harrisburg, PA 17101
jorevan@pa.gov

Richard Kanaskie, Esq.
Bureau of Investigation & Enforcement
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17120
rkanaskie@pa.gov

/s/ Whitney E. Snyder
Thomas J. Sniscak
Whitney E. Snyder

DATED: January 4, 2021