

COMMONWEALTH OF PENNSYLVANIA



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May 19, 2023

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 and Waiver
of Commission Regulations for the Period June 1,
2024 through May 31, 2027
Docket No. P-2023-3039927

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 on the parties as indicated on the enclosed Certificate of Service.

Respectfully submitted,

/s/ Gina L. Miller
Gina L. Miller
Assistant Consumer Advocate
PA Attorney I.D. # 313863
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Enclosures:

cc: The Honorable Mark A. Hoyer (**email only**)
Certificate of Service

*346371

CERTIFICATE OF SERVICE

Petition of Pike County Light and Power Company :
for Approval of Default Service Plan and Waiver : Docket No. P-2023-3039927
of Commission Regulations for the Period June 1, :
2024 through May 31, 2027 :

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 19th day of May 2023.

SERVICE BY E-MAIL ONLY

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Phone: (717) 783-5048
Dated: May 19, 2023
*346406

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Petition of Pike County Light and Power Company :
for Approval of Default Service Plan (DSP) and : Docket No. P-2023-3039927
Waiver of Commission Regulations for the Period :
June 1, 2024 through May 31, 2027 :

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:

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Aron J. Beatty
Senior Assistant Consumer Advocate
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Respectfully Submitted,

/s/ Gina L. Miller
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Aron J. Beatty
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E-Mail: ABeatty@paoca.org

Dated: May 19, 2023

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 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 April 13, 2023, Pike filed its Petition for Approval of Default Service Plan for the Period June 1, 2024 through May 31, 2027 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. Pike proposes to acquire supply for residential customers primarily through spot market purchases from the New York Independent System Operator. Additionally, consistent with its existing Default Service Plan, Pike proposes to continue using a financial hedging strategy for a portion of its default supply for the purpose of reducing price volatility. This will entail the use of financial products (energy swaps) which will convert hourly priced electricity to fixed price electricity.

The Consumer Advocate has determined to intervene in this proceeding to protect the interests of Pike's residential customers. The 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 both just and reasonable and consistent with Pennsylvania law.