



COMMONWEALTH OF PENNSYLVANIA

September 8, 2023

E-FILED

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

Re: Petition of Pike County Light & Power Company for Approval of a Default Service Plan and Waiver of Commission Regulations / Docket No. P-2023-3039927

Dear Secretary Chiavetta:

The Pennsylvania Public Utility Commission's Implementation Order at *Electronic Access to Pre-Served Testimony*, Docket No. M-2012-2331973, requires that all testimony furnished to the court reporter during a proceeding must subsequently be provided to the Secretary's Bureau. The following pre-served testimony and exhibits on behalf of the Office of Small Business Advocate ("OSB") are admitted evidence pursuant to the Interim Order Granting Joint Stipulation for Admission of Testimony and Exhibits into the Evidentiary Record entered on August 31, 2023 attached herein.

As such, this letter will confirm that the Office of Small Business Advocate ("OSBA") has e-filed the **Public Version** of Direct Testimony and Exhibits IEC-1 and IEC-2, of Mark Ewen in the above-captioned proceeding.

All known parties were previously served with the aforementioned Testimony. If you have any questions, please contact me.

Sincerely,

/s/ Steven C. Gray

Steven C. Gray
Senior Supervising
Assistant Small Business Advocate
Attorney ID No. 77538

Enclosures

cc: Mark Ewen
Parties of Record (Cover Letter and Certificate of Service Only)



COMMONWEALTH OF PENNSYLVANIA

July 21, 2023

The Honorable Mark A. Hoyer
Administrative Law Judge
Pennsylvania Public Utility Commission
301 5th Avenue, Suite 220
Pittsburgh, PA 15222

Re: Petition of Pike County Light & Power Company for Approval of a Default Service Plan and Waiver of Commission Regulations / Docket No. P-2023-3039927

Dear Judge Hoyer :

Enclosed please find the **Public Version** Direct Testimony and Exhibits of Mark Ewen, labeled OSBA Statement No. 1, on behalf of the Office of Small Business Advocate (“OSBA”), in the above-captioned proceeding.

As evidenced by the enclosed Certificate of Service, all known parties will be served, as indicated.

If you have any questions, please do not hesitate to contact me.

Sincerely,

/s/ Steven C. Gray

Steven C. Gray
Senior Supervising
Assistant Small Business Advocate
Attorney ID No. 77538

Enclosures

cc: PA PUC Secretary Rosemary Chiavetta (Cover Letter & Certificate of Service only)
Mark Ewen
Parties of Record

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**PETITION OF PIKE COUNTY LIGHT :
AND POWER COMPANY FOR APPROVAL :
OF DEFAULT SERVICE PLAN AND WAIVER:
OF COMMISSION REGULATIONS : Docket No. P-2023-3039927
FOR THE PERIOD JUNE 1, 2024 THROUGH :
MAY 31, 2027 :**

Direct Testimony and Exhibits of

MARK D. EWEN

On Behalf of the

**Pennsylvania Office of Small Business Advocate
PUBLIC VERSION**

Topics:

Hedging Program

Date Served: July 21, 2023

Date Submitted for the Record: August 31, 2023

DIRECT TESTIMONY OF MARK D. EWEN

1 **1. Introduction and Context**

2 **Q. Mr. Ewen, please state your name and briefly describe your qualifications.**

3 A. My name is Mark D. Ewen. I am a Principal of Industrial Economics, Incorporated (“IEc”),
4 a consulting firm located at 2067 Massachusetts Avenue, Cambridge, MA 02140. My
5 consulting practice focuses on regulatory and environmental economics, expert case
6 management and economic damages estimation in a variety of litigation contexts, and
7 financial analysis. I obtained a B.A degree in Economics and Political Science from the
8 University of North Dakota, and a Master of Public Policy degree from the University of
9 Michigan. My résumé and a listing of the expert testimony that I have filed in various
10 litigation and utility regulatory proceedings are attached in Exhibit IEC-1.

11 **Q. Please describe your assignment in this matter.**

12 A. OSBA requested that I review the proposal by Pike County Light & Power Company
13 (“PCL&P” or “the Company”) in its petition for its default service plan (“DSP”), to
14 determine whether the proposal is consistent with sound economics and regulatory policy,
15 and fairly treats small business customers. I focus this testimony on a review of the
16 Company’s electricity price hedging program.

17 **Q. Please provide an overview of the salient features of the Company’s proposed DSP.**

18 A. PCL&P generally proposes to continue the existing DSP for three years, from June 2024
19 to May 2027. The key features of the plan include:

- 20 • Because PCL&P is interconnected to the NYISO and is not itself a load-serving entity
21 (“LSE”), the Company purchases electricity supplies through its former affiliate
22 Orange & Rockland Utilities, Inc. (O&R). O&R allocates spot market energy costs,
23 generation capacity costs and all other NYISO costs to PCL&P, as well as imposing
24 fees for transmitting the power and some administrative costs.
- 25 • Spot market prices are partially hedged with financial transactions, described in more
26 detail below.

- 1 • Default service costs include market energy and capacity costs, plus costs incurred for
2 hedging, legal services, consulting services, renewable energy credits, and other
3 ancillary services.

- 4 • PCL&P procures alternative energy certificates (“AECs”) to meet its obligation
5 under the Alternative Energy Portfolio Standards Act (“AEPSA”) by making
6 solicitations to various brokers, as assisted by its outside consultant. Due to its
7 small size, PCL&P does not follow a formal procurement process.

- 8 • Default service rates are differentiated by service classification and include a flat per-
9 kWh market-based charge and a per-kWh reconciliation charge, updated quarterly.
10 Forecast purchase costs are allocated among the rate classes based on class load profiles
11 and loss factors.

12 **Q. Please summarize the key attributes of the Company’s financial hedging program**
13 **that was adopted in the last default service proceeding.**

14 A. The Company attempts to reduce volatility in its default service charges by engaging in
15 financial hedges related to its spot energy purchases. The hedging strategy has the
16 following characteristics: **** BEGIN HIGHLY CONFIDENTIAL ****

■ | [REDACTED]

■ [REDACTED]

■ [REDACTED]

■ [REDACTED]

■ [REDACTED]

■ | [REDACTED]

■ [REDACTED]

■ [REDACTED]

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10 **** END HIGHLY CONFIDENTIAL ****

11 **Q. What is your other primary concern with the hedging program implementation?**

12 A. **** BEGIN HIGHLY CONFIDENTIAL **** [REDACTED]

█ [REDACTED]
█ [REDACTED]
█ [REDACTED]
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EXHIBIT IEc-1

RÉSUMÉ AND EXPERT TESTIMONY LIST

FOR

MARK D. EWEN

Overview

Mr. Ewen has a strong background in applied economics, empirical methodologies, and financial analysis. As a Principal at Industrial Economics, Incorporated (IEc), he focuses on expert case management and economic damages estimation in a variety of litigation contexts, regulatory and environmental economics, and financial analysis. Within his areas of expertise, Mr. Ewen has been qualified as an expert witness before judicial and regulatory bodies (see schedule of testimony and appearances). He has also served as a Managing Director of the firm.

Education

Master of Public Policy, University of Michigan

Bachelor of Arts, summa cum laude in Economics and Political Science, University of North Dakota

Project Experience

Examples of his project work include the following:

Mr. Ewen has participated in various proceedings concerning energy markets and regulated utilities. These efforts, which focus on issues related to cost allocation and rate design, include working on behalf of industry and consumer intervenor groups in rate-making cases before the public utility commissions in Pennsylvania and Alberta, Canada, and the U.S. Postal Rate Commission. For example, for the **PENNSYLVANIA OFFICE OF SMALL BUSINESS ADVOCATE**, he has provided consulting and analytic support relating to electricity and natural gas tariff design, revenue requirements, and other regulatory initiatives concerning electrical and natural gas distribution utilities. For the **RHODE ISLAND ATTORNEY GENERAL**, Mr. Ewen conducted a due diligence review of PPL's proposed acquisition of Narragansett Electric Company and its potential impacts on the state's ratepayers.

For the **NEW YORK STATE ENERGY RESEARCH AND DEVELOPMENT AUTHORITY (NYSERDA) AND DEPARTMENT OF PUBLIC SERVICE (DPS)**, Mr. Ewen provided expert services assessing the economic impacts to municipal governments of extended electricity outages related to Tropical Storm Isaias. As part of this work, he constructed a model to estimate various costs of incremental staffing requirements for over 500 localities, including excess overtime, surge time (i.e., bringing on extra staff for outage response coordination and logistics), and idle time (e.g., crews waiting extended periods for downed lines to be de-energized). The review also included consideration of other direct costs, including, among others: effects to water systems; delivery of bottled water; operation of generators; and other constraints on the provision of essential governmental services. The litigation was settled to the satisfaction of the involved parties.

For the **NYSERDA AND NEW YORK DPS**, Mr. Ewen directed the development of a Generic Environmental Impact Statement (GEIS), pursuant to the requirement of the State Environmental Quality Review Act (SEQRA) that assessed the environmental and economic impacts of the "Reforming the Energy Vision" and "Clean Energy

Fund” initiatives within the state. He also directed the preparation of a Supplemental EIS to assess the environmental and economic impacts of the newly proposed Clean Energy Standard (CES). The CES is being developed to support the state’s goal of supplying 50 percent of electricity demand with renewable generation resources by the year 2030. More recently, he directed the development of a model to assess the financial viability of various waste-to-energy technologies, and related social welfare benefits. This model uses detailed capital budgeting scenarios for specific facilities to generate forecast scenarios.

For the **U.S. DEPARTMENT OF THE INTERIOR, BUREAU OF OCEAN ENERGY MANAGEMENT (BOEM)**, directing an assessment of the Bureau’s approach to calculating and presenting the operating fee included in offshore wind leases under BOEM’s jurisdiction. As part of this engagement, IEC provided a number of recommendations for simplifying the implementation of the operating fee formula and identified available data sources and approaches to estimating individual components of the fee formula. The review also addressed the structure and levels of fees associated with operations of renewable wind energy projects in the U.S. and worldwide. More recently, IEC has been supporting the development of Standard Operating Procedures for the fee calculation and lease management process. The overall goal is to provide information resources and a methodological approach that will allow lessees to derive accurate data for fee equation variables efficiently and consistently, and for BOEM to present the fee calculation clearly in the lease.

For **NYSERDA**, conducting a market analysis examining the potential economic development opportunities that could accrue in New York from hydrogen playing a role in achieving components of its Climate Leadership and Community Protection Act.

For the **U.S. DEPARTMENT OF THE INTERIOR, BUREAU OF OCEAN ENERGY MANAGEMENT**, managed the development of a model to assess the economic and fiscal impacts of offshore oil and gas activity in the Gulf of Mexico and other BOEM OCS regions. This model, the Lifecycle Impacts Model (LCIM), assesses the economic and fiscal impacts associated with a specific lease or group of leases, over the time horizon of the lease(s). IEC’s framework for the model was to build a capital budgeting forecasting tool for lease development, yielding estimates of industry expenditures, OCS revenues, industry profits, and employment impacts for a single lease or a set of leases. A key component of model development was to dynamically simulate the complex and unique timing parameters of lease development, incorporating the influence of critical exogenous factors like market prices and lease geology.

For the **U.S. COAST GUARD, NATIONAL POLLUTION FUNDS CENTER**, Mr. Ewen provides ongoing support to the NPFC in adjudicating damages claims resulting from oil spills. These claims include damages for business interruption, lost profits, property damage or value diminution, increased costs, and lost wages or employment, among other categories. Cases have also included damages for contract delays to construction projects and shipping demurrage. Industry sectors that Mr. Ewen has evaluated include: *electricity generation (nuclear and coal); railroads; cruise ships; oil ship transport; lodging and tourism; food and beverage; gambling; fisheries; marinas; real estate development, oil and gas development; and oil refining.*

Mr. Ewen’s analytic work includes expert financial analysis and economic damages estimation in the context of general litigation and environmental enforcement actions. These efforts include assessing damages in breach of contract, nuisance, and cost recovery actions, and assessing the financial capabilities and economic benefit of noncompliance of firms accused of environmental violations. Clients in this area of his practice include the **U.S. DEPARTMENT OF JUSTICE, U.S. COAST GUARD, U.S. ENVIRONMENTAL PROTECTION AGENCY, STATES,** and private parties.

Testimony and Appearances

Mr. Ewen has provided testimony or appeared in the following cases and regulatory proceedings.

On behalf of Pennsylvania's Office of Small Business Advocate, submitting testimony before the Pennsylvania Public Utility Commission, concerning cost allocation, revenue allocation, and rate design in the base rates case for Columbia Gas of Pennsylvania (Docket No. R-2022-3031211, June 2022).

On behalf of Attorney General of the State of Rhode Island, submitted testimony before the Rhode Island Division of Public Utilities and Carriers concerning due diligence and related reviews of PPL Corporation's proposed acquisition of Narragansett Electric Company from National Grid USA (Docket No. D-21-09, November 2021).

Expert report and deposition testimony concerning economic damages and related financial matters, *Seaplane Adventures, LLC, vs. County of Marin, California*; expert report filed September 2021, deposition testimony given September 2021.

Expert reports and deposition testimony on bankruptcy reorganization plan feasibility and related financial matters, *in re: First Energy Solutions Corp., et al., Debtors, Case No. 18-50757*; expert reports filed July 2019, deposition testimony given August 9, 2019.

Expert declaration concerning economic damages and related financial matters, *in re: Outer Banks Power Outage Litigation, all actions, No. 4:17-CV-141-D*, March 2018.

Expert report and deposition testimony on Economic Damages in *State of Alaska v. Williams Alaska Petroleum, Inc., et al., Case No. 4FA-14-01544 CI*; expert report filed December 2016, deposition testimony given February 15, 2017.

Expert reports and deposition testimony on Economic Benefit in *Sierra Club v. Energy Future Holdings Corp. et al., Case No. 5:10-cv-156 (E.D. Tex.)* and *Sierra Club v. Energy Future Holdings Corp. et al., Case No. 6:12-cv-108 (W.D. Tex.)*; expert reports filed in June and July 2013, deposition testimony given August 2013. Trial testimony given in *Case No. 6:12-cv-108 (W.D. Tex.) in March 2014*.

Expert testimony on ability-to-pay provided, in the matter of Mercury Vapor Processing Technologies, Inc., et al. (No. RCRA-05-2010-0015), July 2011.

Expert Declaration in a patent case concerning economic and financial matters in the context of environmental credits valuation -- In re Patent Application of: Jeff Andrienas et al., Application No.: 12/328,219, For: VALUING ENVIRONMENTAL CREDITS, submitted June 2011.

Expert report and deposition testimony on financial matters in Evansville Greenway and Remediation Trust v. Southern Indiana Gas and Electric Company, Inc., et al. (03:07-cv-0066-SEB-WGH); expert report filed July 2009, deposition testimony given January 2010.

Expert testimony on ability-to-pay provided, in the matter of Robert J. Heser, Andrew J. Heser, and Heser Farms (No. CWA-05-2006-0002), May 2007.

On behalf of Pennsylvania's Office of Small Business Advocate, submitting testimony before the Pennsylvania Public Utility Commission, concerning tariff design issues for Columbia Gas of Pennsylvania (Docket No. R-00049783, May 2005).

On behalf of Pennsylvania's Office of Small Business Advocate, submitting testimony before the Pennsylvania Public Utility Commission, concerning cost allocation, revenue assignment, and rate design for Pennsylvania Power and Light (Docket No. R-00049255, August 2004).

Expert report on economic damages in United States v. Southern California Edison No. CIV. F-01-5167 OWW DLB (E.D. Cal.), July 2004; deposition testimony provided September 2004.

Expert testimony on ability-to-pay provided in U.S. v. Peter Thorson, Managed Investments, Inc., Construction Management, Inc., and Gerke Excavating, Inc. (No. 03-C-0074), May 2004.

Expert testimony on ability-to-pay provided in U.S. v. Paul A. Heinrich and Charles Vogel Enterprises, Inc. (No. 03-C-0075-S), October 2003.

Expert testimony on ability-to-pay provided in the matter of Dearborn Refining Company (No. RCRA-05-2001-0019), February 2003.

On behalf of Pennsylvania's Office of Small Business Advocate, submitting testimony before the Pennsylvania Public Utility Commission, concerning recovery of purchased gas costs and revenue sharing for PFG Gas and Northern Penn Gas (Docket No. R-00027389, July 2002).

Expert report and testimony on economic damages in Carol Marmo et al. v. IBP, Inc.; expert report filed March 2002, deposition testimony given June 2002, September 2004, and testimony at trial given February 2005.

On behalf of Pennsylvania's Office of Small Business Advocate, submitting testimony before the Pennsylvania Public Utility Commission, concerning recovery of purchased gas costs and revenue sharing for National Fuel Gas Distribution Corporation (Docket No. R-00016789, March 2002).

On behalf of the Office of the Consumer Advocate, providing testimony before the United States Postal Rate Commission regarding cost allocation of city carrier street time costs. Docket No. R2000-1, July 11, 2000.

Expert report and declaration on ability-to-pay in re Indspec Chemical Corporation and Associated Thermal Services, Inc., and related testimony in U.S. EPA administrative court on February 24, 1998 (No. CAA-III-086).

Expert report on ability-to-pay in re Harrisburg Hospital and First Capital Insulation, Inc. and related testimony in U.S. EPA administrative court on October 8, 1997 (No. CAA-III-076).

2023

EXHIBIT IEc-2

REFERENCED INTERROGATORY RESPONSES



Highly Confidential

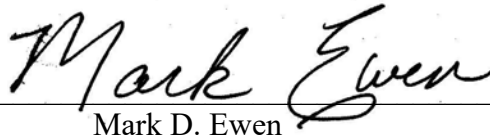
**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**PETITION OF PIKE COUNTY LIGHT :
AND POWER COMPANY FOR APPROVAL :
OF DEFAULT SERVICE PLAN AND WAIVER:
OF COMMISSION REGULATIONS : Docket No. P-2023-3039927
FOR THE PERIOD JUNE 1, 2024 THROUGH :
MAY 31, 2027 :**

VERIFICATION

I, Mark D. Ewen, hereby state that the facts set forth in the Direct Testimony labelled OSBA Statement No. 1 and associated Exhibits IEc-1 through IEc-2 are true and correct to the best of my knowledge, information, and belief, and that I expect to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 19 Pa. C.S. § 4904 (relating to unsworn falsification to authorities).

Date: 7/21/2023



Mark D. Ewen

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of Pike County Light & Power for :
Approval of Its Default Service Plan and : **Docket No. P-2023-3039927**
Waiver of Commission Regulations :

I hereby certify that true and correct copies of the foregoing have been served via email (*unless other noted below*) upon the following persons, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

The Honorable Mark A. Hoyer
Administrative Law Judge
Pennsylvania Public Utility Commission
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Pittsburgh, PA 15222
mhoyer@pa.gov
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pddemanchick@hmslegal.com

DATE: July 21, 2023

/s/ Steven C. Gray

Steven C. Gray
Senior Supervising
Assistant Small Business Advocate
Attorney ID No. 77538

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of Pike County Light & Power for :
Approval of Its Default Service Plan and : **Docket No. P-2023-3039927**
Waiver of Commission Regulations :

I hereby certify that true and correct copies of the foregoing have been served via email (*unless other noted below*) upon the following persons, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

The Honorable Mark A. Hoyer
Administrative Law Judge
Pennsylvania Public Utility Commission
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DATE: September 8, 2023

/s/ Steven C. Gray

Steven C. Gray
Senior Supervising
Assistant Small Business Advocate
Attorney ID No. 77538

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of Pike County Light & Power	:	
Company for Approval of Default Service	:	P-2023-3039927
Plan and Waiver of Commission Regulations	:	

**INTERIM ORDER
GRANTING JOINT STIPULATION FOR ADMISSION
OF TESTIMONY AND EXHIBITS INTO THE EVIDENTIARY RECORD**

On August 29, 2023, Pike County Light & Power Company (PCL&P or Petitioner), the Office of Consumer Advocate (OCA) and the Office of Small Business Advocate (OSBA) (hereinafter collectively referred to as the “Stipulating Parties”), filed a Joint Stipulation for Admission of Testimony and Exhibits into the Evidentiary Record in the above-captioned proceeding. Each of the Stipulating Parties stipulated to the authenticity of the testimony and exhibits listed in the Joint Stipulation and requested that they be admitted into the record of this proceeding on the terms and conditions set forth in the Stipulation. The Stipulating Parties indicated that certain filings contain information marked as “**Confidential**” and/or “**Highly Confidential**” and will be filed under separate cover by each party sponsoring such materials.

As this request is reasonable, the Joint Stipulation for the Admission of Testimony and Exhibits into the Evidentiary Record will be granted.

On August 29, 2023, the Stipulating Parties were notified that the hearing scheduled for August 30, 2023, was canceled. A Cancellation Notice was issued on August 30, 2023.

THEREFORE,

IT IS ORDERED

1. That the August 29, 2023, Joint Stipulation for the Admission of Testimony and Exhibits into the Evidentiary Record executed by Pike County Power & Light Company, the Office of Consumer Advocate and the Office of Small Business Advocate, is granted.

2. That the following written testimony statements, accompanying exhibits and appendices, and respective executed verifications are hereby admitted into the record of this proceeding on the terms and conditions set forth in the Joint Stipulation:

Pike County Light & Power Company

Direct Testimony

- A. Direct Testimony of Russell Miller (PCLP Statement No. 1) (Public Version) and Exhibit RM-1, Exhibit RM-2 (Redacted) and Exhibit RM-3 (Redacted).
- B. Direct Testimony of Russell Miller (PCLP Statement No. 1) (**Highly Confidential Version**) and Exhibits RM-1, RM-2 (**Highly Confidential**) and RM-3 (**Highly Confidential**).
- C. Direct Testimony of Noel Chesser (PCLP Statement No. 2) (Public Version) and Exhibit NPC-1 and Exhibit NPC-2 (Redacted).
- D. Direct Testimony of Noel Chesser (PCLP Statement No. 2) (**Highly Confidential Version**) and Exhibit NPC-1 and Exhibit NPC-2 (**Highly Confidential**).

Rebuttal Testimony

- A. Rebuttal Testimony of Russell Miller (PCLP Statement No. 1-R) (Public Version) and Exhibit RM-1R (Redacted).
- B. Rebuttal Testimony of Russell Miller (PCLP Statement No. 1-R) (**Highly Confidential Version**) and Exhibit RM-1R (**Highly Confidential**).

Office of Consumer Advocate

Direct Testimony

- A. Direct Testimony of Serhan Ogur, Ph.D. (OCA Statement No. 1) (Public Version) and Appendix A, Exhibit SO-1 (Redacted), and a signed verification.

- B. Direct Testimony of Serhan Ogur, Ph.D. (OCA Statement No. 1) **(Confidential Version)** and Appendix A, Exhibit SO-1 **(Confidential)**, and a signed verification.

Rebuttal Testimony

- A. Rebuttal Testimony of Serhan Ogur, Ph.D. (OCA Statement 1R) (Public Version), Exhibit SO-2 (Redacted), and a signed verification.
- B. Rebuttal Testimony of Serhan Ogur, Ph.D. (OCA Statement 1R) **(Confidential Version)**, Exhibit SO-2 **(Confidential)**, and a signed verification.

Surrebuttal Testimony

- A. Surrebuttal Testimony of Serhan Ogur, Ph.D. (OCA Statement No. 1SR) (Public Version) and a signed verification.
- B. Surrebuttal Testimony of Serhan Ogur, Ph.D. (OCA Statement No. 1SR) **(Confidential Version)** and a signed verification.

Office of Small Business Advocate

Direct Testimony

- A. Direct Testimony of Mark D. Ewen (OSBA Statement No. 1) (Public Version), Exhibit IEC-1 and IEC-2 (Redacted), and a signed verification.
- B. Direct Testimony of Mark D. Ewen (OSBA Statement No. 1) **(Highly Confidential Version)**, Exhibit IEC-1 and IEC-2 **(Highly Confidential Version)**, and a signed verification.

Surrebuttal Testimony

- A. Surrebuttal Testimony of Mark D. Ewen (OSBA Statement No. 1-S) **(Highly Confidential Version)** and Exhibit IEC-1 **(Confidential Version)** and a signed verification.

3. That copies of the testimony and exhibits identified in Ordering Paragraph 2 above be filed with the Secretary’s Bureau of the Commission within 10-days of the entry of this order.

4. That all filings designated as “**Confidential**” and/or “**Highly Confidential**” be filed separately from public, redacted versions of admitted evidence by the parties and placed in non-

P-2023-3039927 - PETITION OF PIKE COUNTY LIGHT & POWER COMPANY FOR APPROVAL OF ITS DEFAULT SERVICE PLAN AND WAIVER OF COMMISSION REGULATIONS AND *NUNC PRO TUNC* TREATMENT FOR THE PERIOD JUNE 1, 2024 THROUGH MAY 31, 2027

Revised: June 27, 2023

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Accepts eService

(Representing Pike County Light & Power Company)

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