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January 18, 2005

VIA HAND DELIVERY

James J. McNulty, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor
Harrisburg, PA 17120

RE: Implementation of the Alternative Energy Portfolio Standards Act of 2004; Docket No. M-00051865

Dear Secretary McNulty:

In accordance with the process set forth in the Notice of Technical Conference issued on January 7, 2005, in the above-referenced proceeding, Citizens' Electric Company of Lewisburg ("Citizens") and Wellsboro Electric Company ("Wellsboro") hereby file these Letter Comments. Citizens' and Wellsboro are small Electric Distribution Companies ("EDCs") serving approximately 6,000 customers each. Citizens' and Wellsboro are concerned about the impact of the Alternative Energy Portfolio Standards Act of 2004 on small EDCs and their customers. At this time, Citizens' and Wellsboro have no specific comments on the issues identified in the Notice; however, the Companies will be monitoring the activities at this docket and may choose to comment at a later date regarding the technical and financial feasibility of certain requirements that the Commission or other parties may seek to impose on smaller EDCs.

At this time the Companies request for the following representatives to be included on the service list for this matter:

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Eric Winslow, President and CEO
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Craig Eccher, President and CEO
Wellsboro Electric Company
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Citizens' and Wellsboro are submitting the original and fifteen (15) copies of these Letter Comments for filing with the Commission. Please date stamp the enclosed additional copy of the Letter Comments and kindly return it to our messenger for our filing purposes. If you have any questions regarding this letter, please feel free to contact the undersigned.

Very truly yours,

McNEES WALLACE & NURICK LLC

By **/s/ Pamela C. Polacek**
Pamela C. Polacek

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

PCP/smd

c: Karen Mitchell (via E-mail only)
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