



COMMONWEALTH OF PENNSYLVANIA

May 22, 2018

E-FILED

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

**Re: Pennsylvania Public Utility Commission v. SUEZ Water Pennsylvania, Inc. /
Docket No. R-2018-3000834**

Dear Secretary Chiavetta:

I am delivering for filing today the Prehearing Memorandum, on behalf of the Office of Small Business Advocate ("OSBA"), in the above-captioned proceeding. I respectfully request that a copy of any documents filed in this case be shared as well with our Witness at the address below:

Brian Kalcic
Excel Consulting
225 S. Meramec Avenue, Suite 720 T
St. Louis, MO 63105
excel.consulting@sbcglobal.net

Copies will be served on all known parties in this proceeding, as indicated on the attached Certificate of Service.

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

Sincerely,

Sharon E. Webb
Assistant Small Business Advocate
Attorney ID No. 73995

Enclosures

cc: The Honorable David A. Salapa
Brian Kalcic
Parties of Record

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

PENNSYLVANIA PUBLIC UTILITY COMMISSION	:	
	:	
	:	
v.	:	Docket No. R-2018-3000834
	:	
SUEZ WATER PENNSYLVANIA, INC.	:	

**OFFICE OF SMALL BUSINESS ADVOCATE
PREHEARING MEMORANDUM**

I. INTRODUCTION

The Office of Small Business Advocate (“OSBA”) is authorized to represent the interests of small business consumers of utility services before the Pennsylvania Public Utility Commission (“Commission”) pursuant to the provisions of the Small Business Advocate Act, Act 181 of 1988, 73 P.S. §§ 399.41 - 399.50 (“the Act”). In order to discharge this statutory duty, the Small Business Advocate deems it necessary to participate as a party to this proceeding. Representing the OSBA in this matter is Assistant Small Business Advocate Sharon E. Webb.

Please address all correspondence as follows:

Sharon E. Webb
Office of Small Business Advocate
300 North Second Street, Suite 202
Harrisburg, Pennsylvania 17101
(717) 783-2525
(717) 783-2831 (fax)
swebb@pa.gov

II. FILING BACKGROUND

On April 30, 2018, SUEZ Water Pennsylvania, Inc. (“SWPA” or the “Company”) filed Supplement No. 53 to Tariff Water, Pa. P.U.C. No. 7 with the Commission. Supplement No. 53, if approved by the Commission, would provide the Company with a general rate increase in water rates of \$6.2 million per year.

On May 22, 2018, the OSBA filed a Complaint against Supplement No. 53.

III. IDENTIFICATION OF WITNESSES AND TENTATIVE ISSUES

Assisting in the development and presentation of the OSBA’s case in this proceeding will be:

Mr. Brian Kalcic
Excel Consulting
Suite 720
225 South Meramec Avenue
St. Louis, MO 63105
(314) 725-2511
excel.consulting@sbcglobal.net

After an initial review of the materials submitted by the Company, the OSBA has identified the following issues:

1. Whether SWPA’s class cost-of-service study methodology is appropriate;
2. Whether the Company’s proposed class revenue allocation is cost based; and
3. Whether the Company’s proposed Commercial and Industrial rate designs are reasonable and appropriate.

The OSBA reserves the right to pursue additional issues as they arise throughout the proceeding.

The OSBA will participate in the case to assure that the interests of small business customers of Appalachian are adequately represented and protected.

IV. SERVICE OF DOCUMENTS

The OSBA requests that all parties serve a hard copy of any document filed in this case upon the OSBA and the OSBA witness identified above. In addition to hard copies of pleadings, briefs, and exceptions, the OSBA requests hard copies of responses to discovery propounded by the OSBA or any other party.

V. SETTLEMENT

The OSBA notes its willingness to enter into settlement discussions at the appropriate phase of this proceeding.

VI. HEARING AND BRIEFING SCHEDULE

The OSBA will work with other parties to develop a mutually acceptable procedural schedule.

Respectfully submitted,



Sharon E. Webb
Attorney ID No. 73995
Assistant Small Business Advocate

For:

John R. Evans
Small Business Advocate

Office of Small Business Advocate
300 North Second Street, Suite 202
Harrisburg, PA 17101

Dated: May 22, 2018

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

PENNSYLVANIA PUBLIC UTILITY COMMISSION :
: **Docket No. R-2018-3000834**
v. :
: **SUEZ WATER PENNSYLVANIA, INC.** :

CERTIFICATE OF SERVICE

I hereby certify that true and correct copies of the foregoing have been served via email and/or First-Class mail (*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 David A. Salapa
Administrative Law Judge
Pennsylvania Public Utility Commission
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(Email and Hand Delivery)

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(Counsel for SUEZ)

DATE: May 22, 2018



Sharon E. Webb
Assistant Small Business Advocate
Attorney I.D. No. 73995