John J. Gallagher

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June 28, 2019

VIA HAND DELIVERY

Honorable Rosemary Chiavetta Secretary Pennsylvania Public Utility Commission P.O. Box 3265 Harrisburg, PA 17105-3265

> Re: City of Lancaster- 2019 General Wastewater Rate Increase Filing

Docket No. R-2019-3010955

Dear Secretary Chiavetta:

'On June 13, 2019, the City of Lancaster ("City") filed its Intent to File a General Base Rate Case pursuant to the Commission's regulations at 52 PA Code §§ 53.45 and 69.402 on or after July 13, 2019 based upon a historic test year ended December 31, 2018 a future test year ending December 31, 2019, and a fully projected future test year ending December 31, 2020. Utilizing such a test year, the City would be required by 52 Pa. Code §52.52 (b) (2) to file its base rate case prior to June 30, 2019 based upon the 180 day filing requirement for jurisdictional municipal corporations.

The City respectfully requests an extension of time to file its general base rate case which as stated in its June 13, 2019 Letter of Intent is estimated to increase the annual operating revenues from customers located outside the City by approximately \$709,600 or 54% and will be based upon a historic test year ended December 31, 2018. The delay in filing has been due to delays in closing out the City's financial records for 2018. The City thereby requests a waiver of the Commission's regulation (52 Pa. Code §53.52 (b) (2) and requests an additional 43 additional days in which to file its general base rate case which will allow the City to file its general base rate case on July 13, 2019. If filed on July 13, 2019 the City proposes an effective date of September 9, 2019 for its proposed rates. The City's most recent prior wastewater general base rate case was 2012.

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Copies of this document have been served on the parties listed in the attached Certificate of Service.

Sincerely,

John J. Gallagher

cc: Certificate of Service Barry Handwerger, Esquire Mr. Patrick Hopkins

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the foregoing document upon the participants, listed below, in the manner indicated below, and in accordance with the requirements of § 1.54 (relating to service by a party).

VIA ELECTRONIC MAIL AND HAND DELIVERY

Tanya McCloskey, Consumer Advocate Office of Consumer Advocate 555 Walnut Street 5th Floor, Forum Place Harrisburg, PA 17101-1923

Richard A. Kanaskie Esquire, Esquire Director Bureau of Investigation and Enforcement PA Public Utility Commission P.O. Box 3265 Harrisburg, PA Mr. John Evans, Office of Small Business Advocate Commerce Building, Suite 202 300 North Second Street Harrisburg, PA 17102

Mr. Paul R. Zander
Fixed Utility Financial Analyst
Bureau of Technical Utility Services
PA Public Utility Commission
P.O. Box 3265
Harrisburg, PA

Dated: June 28, 2019

PROBLEMS BUREAU PA PUC PA PUC

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Counsel for City of Lancaster

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Honorable Rosemary Chiavetta Secretary Pennsylvania Public Utility Commission 400 North Street Harrisburg, PA 17120