

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

Mr. & Mrs. Gerald S. Lepre, Jr.,	:	Docket(s):	R-2020-3019-369
	:		C-2020-3019646
	:		R-2020-3019371
Vs.	:		C-2020-3019670
	:		
	:		
Pennsylvania American Water Company,	:		
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PREHEARING CONFERENCE MEMORANDUM

MR. & MRS. GERALD S. LEPRE, JR.

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Mr. & Mrs. Gerald S. Lepre, Jr.  
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Munhall, PA 15120  
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I. INTRODUCTION

On May 22, 2020, a Prehearing Conference Order was filed setting a prehearing conference for Thursday, June 4, 2020 at 1:00 p.m. Prehearing Memorandum are due no later than Wednesday, June 3, 2020 at 4:00 p.m. Complainant Consumers timely file this Prehearing Memorandum

II. STATEMENT OF PROCEEDINGS:

On April 29, 2020, Pennsylvania American Water Company ( hereafter “PAWC”) submitted a rate filing, Supplement No. 19 to its Tariff Water PA PUC No. 5, and Supplement No. 19 to its Tariff Wastewater PA PUC No. 16. PAWC proposes a multi-year increase to its water and wastewater rates pursuant to 66 Pa. C.S. § 1308(d). PAWC proposes to increase the Company’s total annual operating revenues by \$138.6 million over two years. Specifically, PAWC proposes to increase rates by approximately \$92.4 million, or 12.9%, in 2021 (Rate Year 1) and \$46.2 million, or 5.8%, in 2022 (Rate Year 2).

On April 30, 2020, Complainant’s/Consumer’s filed a complaint in the above captioned matter concerning the rate increases.

III. REPRESENTATION OF COMPLAINANT’S/CONSUMER’S:

Complainant’s/Consumer’s are pro se and service should be made upon:

Mr. & Mrs. Gerald S. Lepre, Jr.  
4015 Farfield Avenue  
Munhall, PA 15120  
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Phone: 1 (412) 927-8942

Pursuant to the Commission’s Emergency Order issued on March 20, 2020, Complainant’s/Consumer’s request service by email. After the Emergency is ceased to be in effect,

Complainant's/Consumer's would request both email and a paper copy of all documents served in this proceeding.

IV. STATEMENT OF ISSUES PRESENTED:

1. A full and adequate investigation is essential to understand whether the terms, conditions, and rates set forth by PAWC's notice and requests for rate increases are just and reasonable. The increases in question will increase water bills significantly. These increases are unjustifiable, unreasonable and in derogation of the laws of this Commonwealth; thus, calling into question affordable water and wastewater services.
2. Additionally, Complainant's/Consumer's are concerned about the rate increases during an ongoing Pandemic and/or COVID-19

V. EVIDENCE TO BE PRESENTED

Complainant's/Consumer's does aver they will present testimony and/or any documentation they receive in support of their claims. Complainant's/Consumers will also rely on any and all testimony and documents submitted by other witnesses or parties to this action.

VI. WITNESSES AND TESTIMONY

Complainant's/Consumer's intend to present the following witness to testify in this matter, and reserves the right to call additional witnesses as may be warranted with due notice:

Mr. & Mrs. Gerald S. Lepre, Jr.  
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VII. DISCOVERY

Complainant's/Consumer's support the discovery requested by the Office of Consumer

Advocate.

VIII. LITIGATION SCHEDULE

Complainant's/Consumer's would like to reach an amicable schedule with all appropriate parties to this action.

IX. SETTLEMENT

Complainant's/Consumer's are willing and able to discuss the options of settlement with any and all parties.

X. CONCLUSION

Complainant's/Consumer's respectfully submit this Prehearing Memorandum.

Respectfully submitted:

/s/ Mr. & Mrs. Gerald S. Lepre, Jr.  
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### **CERTIFICATE OF SERVICE**

The undersigned does hereby certify that we have this 03<sup>rd</sup> day of June, 2020, served a true and correct copy of the following Interrogatories and Request for Production of Documents upon parties of record in this proceeding in accordance with the requirements of 52 Pa. Code §

1.54 via email as follows:

**Susan Simms Marsh, Esquire**  
**Pennsylvania-American Water Company**  
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**Christine Maloni Hoover, Esquire**  
**Office of Consumer Advocate**  
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**Daniel G. Asumus, Esquire**  
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**Brooke E. McGlinn, Esquire**  
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**Victoria Lozinak**  
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