

COMMONWEALTH OF PENNSYLVANIA



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September 7, 2023

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

Re: Pennsylvania Public Utility Commission
v.
Columbia Water Company
Docket No. R-2023-3040258

Dear Secretary Chiavetta:

Enclosed please find the Office of Consumer Advocate's Errata in this matter. The Errata makes corrections to evidence already admitted into the record during evidentiary hearings and filed with the Public Utility Commission on September 1, 2023. The Errata addresses the Surrebuttal Testimony of Jerome D. Mierzwa, OCA Statement 3SR, and OCA Schedules JDM-1 Surrebuttal and JDM-2 Surrebuttal.

On September 7, 2023, Administrative Law Judges Mary D. Long and Charece Z. Collins issued an Interim Order, which admitted the OCA's Errata into the record of this proceeding.

Rosemary Chiavetta, Secretary
September 7, 2023
Page 2

Copies have been emailed to the parties listed on the enclosed Certificate of Service.

Respectfully submitted,

/s/ Barrett C. Sheridan
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Enclosures:

cc: Administrative Law Judge Mary D. Long (**email only**)
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Certificate of Service

4877-1350-9246

CERTIFICATE OF SERVICE

Pennsylvania Public Utility Commission :
v. : Docket No. R-2023-3040258
Columbia Water Company :

I hereby certify that I have this day served a true copy of the following document, the Office of Consumer Advocate's Errata to the Surrebuttal Testimony and Schedules of Jerome D. Mierzwa, OCA Statement 3SR, and OCA Schedules JDM-1 Surrebuttal and JDM-2 Surrebuttal, upon parties of record in this proceeding in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant), in the manner and upon the persons listed below. This document was filed electronically on the Commission's electronic filing system.

Dated this 7th day of September 2023.

SERVICE BY E-MAIL ONLY

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Dated: September 7, 2023

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Pennsylvania Public Utility Commission	:	
	:	Docket Nos. R-2023-3040258
v.	:	C-2023-3040567
	:	C-2023-3040746
Columbia Water Company	:	

ERRATA TO
OFFICE OF CONSUMER ADVOCATE
TESTIMONY AND SCHEDULES

The Office of Consumer Advocate respectfully submits these errata to evidence already admitted into the record in this matter by Administrative Law Judges Mary D. Long and Charece Z. Collins during the evidentiary hearing on August 28, 2023 (Tr. 70, ln. 13-15) and filed with the Public Utility Commission on September 1, 2023.¹ Specifically, the errata pertain to pages 4 and 5 of the Surrebuttal Testimony of Jerome D. Mierzwa, OCA Statement 3SR, and OCA Schedules JDM-1 Surrebuttal and JDM-2 Surrebuttal.

The corrected pages are attached hereto. The changes on each page are reflected in bold print in the Testimony and highlighted in the Schedules. A verification of the errata by the sponsoring witness is attached.

On September 7, 2023, the Presiding Officers issued an Interim Order, which admitted the OCA’s errata into the record of this proceeding.

¹ Pursuant to the Interim Order on Briefs and Closing of the Record issued on August 30, 2023, the record in this matter remains open and, absent a further order, will close on September 22, 2023.

WHEREFORE, the Office of Consumer Advocate respectfully requests that the Commission, Presiding Officers, and the parties to this proceeding note the attached errata to the OCA Statement 3SR and Schedules JDM-1 Surrebuttal and JDM-2 Surrebuttal.

Respectfully Submitted,

/s/ Erin L. Gannon

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Patrick M. Cicero
Consumer Advocate

Dated: September 7, 2023

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

PENNSYLVANIA PUBLIC UTILITY)
COMMISSION)
v.) DOCKET NO. R-2023-3040258
)
COLUMBIA WATER COMPANY)

SURREBUTTAL TESTIMONY OF
JEROME D. MIERZWA

ON BEHALF OF THE
PENNSYLVANIA OFFICE OF CONSUMER ADVOCATE

AUGUST 22, 2023

1 accepted Mr. Kalcic's proposal and adjusted my customer charge calculations
2 presented in my direct testimony to reflect Mr. Kalcic's proposal.

3 Q. ARE YOU FURTHER REVISING THE CUSTOMER CHARGE
4 CALCULATIONS PRESENTED IN YOUR REBUTTAL TESTIMONY?

5 A. Yes. The calculations present in my rebuttal testimony inadvertently excluded Public
6 Fire direct hydrant costs that should have been included in the customer charge
7 calculations. The customer charges calculated under my primary recommendation were
8 presented on Schedule JDM-1 Revised in my rebuttal testimony. For a Residential
9 customer with a 5/8-inch meter the calculated charge was \$12.06. As shown on
10 Schedule JDM-1 Surrebuttal, inclusive of Public Fire direct hydrant costs, the charge
11 is **\$12.45**. The customer charges calculated under my alternative recommendation were
12 presented on Schedule JDM-2 Revised. For a Residential customer with a 5/8-inch
13 meter the calculated charge was \$13.25. As shown on Schedule JDM-2 Surrebuttal,
14 inclusive of Public Fire direct hydrant costs, the charge is **\$13.56**. These recommended
15 customer charges should be reduced to reflect the revenue requirement increase
16 authorized by the Commission in this proceeding as discussed later in my surrebuttal
17 testimony.

18 Q. HOW DO THE CUSTOMER CHARGES PRESENTED IN YOUR
19 SURREBUTTAL TESTIMONY COMPARE TO THE CUSTOMER
20 CHARGES PROPOSED BY CWC IN ITS REBUTTAL TESTIMONY?

21 A. A comparison of CWC's proposed customer charges for a customer with at 5/8-inch
22 meter and my revised customer charge recommendations at CWC rebuttal revenue
23 requirement presented compare as follows:

CWC Proposed
Monthly Customer Charge

Rate District	Current	Proposed	\$ Increase	% Increase
Columbia	\$10.31	\$13.88	\$3.57	34.6%
Marietta	\$8.20	\$13.88	\$5.68	69.3%

OCA Recommended
Monthly Customer Charge

Rate District	Current	OCA	\$ Increase	% Increase
Columbia	\$10.31	\$12.45	\$2.14	20.8%
Marietta	\$8.20	\$12.45	\$4.25	51.8%

OCA Alternative
Monthly Customer Charge

Rate District	Current	Adjusted	\$ Increase	% Increase
Columbia	\$10.31	\$13.56	\$3.25	31.5%
Marietta	\$8.20	\$13.56	\$5.36	65.4%

1

2

III. OFFICE OF SMALL BUSINESS ADVOCATE

3

Witness: Brian Kalcic

4 Q.

WHAT DID MR. KALCIC RECOMMEND IN HIS DIRECT TESTIMONY
CONCERNING THE COMPANY’S ALLOCATION OF ITS REQUESTED
REVENUE INCREASE?

5

6

7 A.

In his direct testimony, Mr. Kalcic claimed that the Company’s method of assigning
revenue responsibility to customer class was arbitrary and without cost foundation.
Therefore, he recommended that each customer class be assigned a uniform percentage
rate increase.

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9

10

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

PENNSYLVANIA PUBLIC UTILITY)	
COMMISSION)	
)	
v.)	DOCKET NO. R-2023-3040258
)	
COLUMBIA WATER COMPANY)	

SCHEDULES ACCOMPANYING THE
SURREBUTTAL TESTIMONY OF
JEROME D. MIERZWA

ON BEHALF OF THE
PENNSYLVANIA OFFICE OF CONSUMER ADVOCATE

CALCULATION OF CUSTOMER CHARGES

BILLING CHARGE

Billing Cost	\$220,507	
----- =	----- =	\$1.740 per billing
No. of Billings	126,789	

METER/SERVICE CHARGE

Meter/Service Cost	\$844,144	
----- =	----- =	\$65.562 per equivalent per year
No. of Equivs.	12,875.5	

PORTION OF FIXED COSTS

Reallocation of Public Fire Protection	\$810,451	
----- =	----- =	\$62.945 per equivalent per year
No. of Equivs.	12,875.5	

COST OF SERVICE METER CHARGES

<u>Monthly</u>	<u>Billing Charge</u>	<u>Meter Charge</u>	<u>Water Charge</u>	<u>Fire Protection</u>	<u>Total Charge</u>
5/8"	\$1.740	\$5.46	\$0.000	\$5.25	\$12.45
3/4"	\$1.740	\$8.20	\$0.000	\$7.87	\$17.80
1"	\$1.740	\$13.66	\$0.000	\$13.11	\$28.51
1 1/2"	\$1.740	\$27.32	\$0.000	\$26.23	\$55.28
2"	\$1.740	\$43.71	\$0.000	\$41.96	\$87.41
3"	\$1.740	\$87.42	\$0.000	\$83.93	\$173.08
4"	\$1.740	\$136.59	\$0.000	\$131.14	\$269.46
6"	\$1.740	\$273.18	\$0.000	\$262.27	\$537.19
8"	\$1.740	\$437.08	\$0.000	\$419.63	\$858.46
10"	\$1.740	\$628.30	\$0.000	\$603.225	\$1,233.27
12"	\$1.740	\$1,174.65	\$0.000	\$1,127.77	\$2,304.16

CALCULATION OF CUSTOMER CHARGES

BILLING CHARGE

Billing Cost	\$290,478	
----- =	----- =	\$2.290 per billing
No. of Billings	126,789	

METER/SERVICE CHARGE

Meter/Service Cost	\$931,542	
----- =	----- =	\$72.350 per equivalent per year
No. of Equivs.	12,875.5	

PORTION OF FIXED COSTS

Reallocation of Public Fire Protection	\$810,451	
----- =	----- =	\$62.945 per equivalent per year
No. of Equivs.	12,875.5	

COST OF SERVICE METER CHARGES

<u>Monthly</u>	<u>Billing Charge</u>	<u>Meter Charge</u>	<u>Water Charge</u>	<u>Fire Protection</u>	<u>Total Charge</u>
5/8"	\$2.290	\$6.03	\$0.000	\$5.25	\$13.56
3/4"	\$2.290	\$9.04	\$0.000	\$7.87	\$19.20
1"	\$2.290	\$15.07	\$0.000	\$13.11	\$30.48
1 1/2"	\$2.290	\$30.15	\$0.000	\$26.23	\$58.66
2"	\$2.290	\$48.23	\$0.000	\$41.96	\$92.49
3"	\$2.290	\$96.47	\$0.000	\$83.93	\$182.68
4"	\$2.290	\$150.73	\$0.000	\$131.14	\$284.15
6"	\$2.290	\$301.46	\$0.000	\$262.27	\$566.02
8"	\$2.290	\$482.33	\$0.000	\$419.63	\$904.26
10"	\$2.290	\$693.35	\$0.000	\$603.225	\$1,298.87
12"	\$2.290	\$1,296.27	\$0.000	\$1,127.77	\$2,426.33

