

COMMONWEALTH OF PENNSYLVANIA



OFFICE OF CONSUMER ADVOCATE

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IRWINA. POPOWSKY
Consumer Advocate

FAX (717) 783-7152
consumer@paoca.org

September 22, 2010

Honorable Conrad A. Johnson
PA Public Utility Commission
Office of Administrative Law Judge
Piatt Place, Suite 220
301 Fifth Avenue
Pittsburgh, PA 15222

Re: Pa. Public Utility Commission
v.
Reynolds Disposal Company
Docket Nos. R-2010-2171339

Dear Judge Johnson:

Enclosed please find an original and one copy of the Prehearing Memorandum of the Office of Consumer Advocate in the above-referenced proceeding.

Copies have been served upon all parties of record as shown on the attached Certificate of Service.

Sincerely yours,

A handwritten signature in cursive script that reads "Chet Maloni Hoover".

Christine Maloni Hoover
Senior Assistant Consumer Advocate
PA Attorney I.D. #50026

Enclosures

cc: Secretary's Office of the PUC
Certificate of Service

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BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

PENNSYLVANIA PUBLIC UTILITY	:	
COMMISSION	:	
	:	
v.	:	Docket No. R-2010-2171339
	:	C-2010-2191397
REYNOLDS DISPOSAL CO.	:	

PREHEARING MEMORANDUM
OF THE
OFFICE OF CONSUMER ADVOCATE

Pursuant to Section 333 of the Public Utility Code, 66 Pa.C.S. § 333, and in response to the prehearing conference order issued in the above-captioned matter, the Office of Consumer Advocate (OCA) provides the following information.

I. ISSUES

On June 30, 2010, Reynolds Disposal Company (the Company) filed Supplement No. 1 to Tariff Sewage - Pa. P.U.C. No. 4, to become effective August 29, 2010. The Company, by filing this tariff supplement, sought an estimated annual increase in base rate revenues of \$77,167 (20.5%). Under the Company's proposal, the proposed metered usage rates would increase from \$100.15 to \$117.07 per quarter, or by 16.89% for the average residential customer using 10,500 gallons per quarter.

The Company serves 681 residential, commercial, industrial and other customers in Pymatuning, Delaware, and Hempfield Townships, Mercer County, Pennsylvania.

After receipt of the Company's direct testimony, the OCA will file direct testimony that will set forth the specific issues to be addressed in this proceeding. At that time, the OCA will also be able to make and to quantify its specific recommendations. Generally, the OCA is reviewing issues related to rate of return, accounting, rate design and quality of service.

II. WITNESSES

The OCA intends to present the direct, rebuttal and surrebuttal testimony, as may be necessary, of the following witness in this proceeding. The OCA's witness will present testimony in written form and will also attach various exhibits, documents, and explanatory information that will assist in the presentation of the OCA's case. In order to expedite the resolution of this proceeding, the OCA requests that copies of all interrogatories, testimony, and answers to interrogatories be mailed directly to the expert witness, as well as mailing a copy to counsel for the OCA.

General Accounting, Financial And Ratemaking Issues

Marilyn Kraus
Senior Regulatory Analyst
Office of Consumer Advocate
555 Walnut Street, Forum Place 5th Floor
Harrisburg PA 17101-1923

Telephone (717) 783-5048
Fax (717) 783-7152

The OCA specifically reserves the right to call additional witnesses, as necessary. As soon as the OCA has determined whether an additional witness or witnesses will be necessary for any portion of its case, all parties of record will be notified.

III. SERVICE ON THE OCA

The OCA will be represented in this proceeding by Senior Assistant Consumer Advocate Christine Maloni Hoover. One copy of all documents should be served on the OCA as follows:

Christine Maloni Hoover
Senior Assistant Consumer Advocate
Office of Consumer Advocate
555 Walnut Street, Forum Place 5th Floor
Harrisburg PA 17101-1923

Telephone (717) 783-5048
Fax (717) 783-7152

IV. DISCOVERY

The OCA does not have any discovery issues.

V. PUBLIC INPUT HEARINGS

The OCA is aware of one objection on file at the PUC. The OCA has received a request, by Representative Longiotti, that the PUC schedule a public input hearing in the Reynolds service territory. In addition, the OCA has received calls from three customers asking for a public input hearing. The OCA will work with the OALJ and the Company to find a suitable location in the service territory.

VI. SCHEDULE

The OCA has not developed a proposed schedule for the submission of testimony, hearings and briefs. However, the OCA will work with the parties and the ALJ to develop a schedule if the issues cannot be resolved fully in the mediation.

Respectfully submitted,



Christine Maloni Hoover
Senior Assistant Consumer Advocate
PA Attorney I.D. # 50026
E-Mail: CHoover@paoca.org

Counsel for:
Irwin A. Popowsky
Consumer Advocate

Office of Consumer Advocate
555 Walnut Street, Forum Place, 5th Floor
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(717) 783-5048

DATED: September 22, 2010

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CERTIFICATE OF SERVICE

Re: Pennsylvania Public Utility Commission
v.
Reynolds Disposal Company
Docket No. R-2010-2171339

I hereby certify that I have this day served a true copy of the foregoing document, Prehearing Memorandum of the Office of Consumer Advocate 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:

Dated this 22nd day of September 2010.

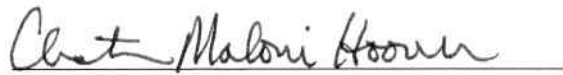
SERVICE IN PERSON

Richard A. Kanaskie, Esquire
Office of Trial Staff
Pa. Public Utility Commission
400 North Street
Harrisburg, PA 17105

SERVICE BY FIRST CLASS MAIL, POSTAGE PREPAID

William R. Lloyd, Jr.
Office of Small Business Advocate
Suite 1102, Commerce Building
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Thomas T. Niesen, Esquire
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212 Locust Street, Suite 500
P.O. Box 9500
Harrisburg, PA 17108-9500
Counsel for Reynolds Disposal Company



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