



December 28, 2023

Via E-Mail Only

Deputy Chief Administrative Law Judge
Christopher P. Pell
Pennsylvania Public Utility Commission
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CPell@pa.gov

Administrative Law Judge John M. Coogan
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor West
Harrisburg, PA 17120
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**Re: Pennsylvania Public Utility Commission v. Pennsylvania-American Water
Company
Docket Nos. R-2023-3043189 (water); R-2023-3043190 (wastewater)**

Prehearing Memorandum of CAUSE-PA

Your Honors:

Please find the attached **Prehearing Memorandum of the Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania (CAUSE-PA)** in the above noted proceeding.

As indicated on the attached Certificate of Service, service on the parties was accomplished by email only.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read "Ria Pereira".

Ria Pereira, Esq.
Counsel for CAUSE-PA

**CC: Secretary Rosemary Chiavetta (via E-file only)
Certificate of Service**

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

Pennsylvania Public Utility Commission :
 :
 v. : Docket Nos. R-2023-3043189
 : R-2023-3043190
 Pennsylvania-American Water Company :

**PREHEARING MEMORANDUM
OF THE COALITION FOR AFFORDABLE UTILITY SERVICES
AND ENERGY EFFICIENCY IN PENNSYLVANIA**

PENNSYLVANIA UTILITY LAW PROJECT
Counsel for CAUSE-PA

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December 28, 2023

On December 22, 2023, a Prehearing Conference Order was issued by Deputy Chief Administrative Law Judge Christopher P. Pell and Administrative Law Judge John M. Coogan setting a telephonic Prehearing Conference for Wednesday, January 3, 2024 at 10:00 a.m., and requiring parties to file a Prehearing Memorandum no later than 12:00 p.m. on Thursday, December 28, 2023. In response, the Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania (CAUSE-PA), through its counsel at the Pennsylvania Utility Law Project, hereby files this Prehearing Conference Memorandum.

I. Background

On November 8, 2023, Pennsylvania-American Water Company (PAWC or the Company) submitted a rate filing, Supplement No. 45 to Tariff Water-PA P.U.C. No. 5 and Supplement No. 47 to Tariff Wastewater-PA P.U.C. No. 16, which proposes to increase rates by approximately \$203.9 million, or approximately 20.2%, based on a fully projected future test year ending June 30, 2025. (Volume I, Statement of Specific Reasons). According to the Company, if the entire rate request is approved as filed, the total bill for a residential water customer in Rate Zone 1 - Water who uses approximately 3,201 gallons per month would increase from \$70.65 to \$88.24 per month, or by 24.9%, while the total bill for a residential wastewater customer in Rate Zone 1 – Wastewater using approximately 3,122 gallons per month would decrease from \$105.18 to \$100.08 per month, or by 4.8%. (Volume I, Notice of Proposed Water and Wastewater Rate Changes). However, the proposed decrease in projected wastewater bills is as a result of PAWC’s proposal to reallocate a portion of its wastewater revenue to water operations, increasing residential water bills by approximately \$6.08. (PAWC St. 1 at 20-21).

On December 4, 2023, CAUSE-PA filed a Petition to Intervene and Answer, requesting full intervenor status as an active party to the proceeding.

On December 21, 2023, the Pennsylvania Public Utility Commission (Commission) entered Orders suspending, respectively, Pennsylvania-American Water Company's proposed Supplement No. 45 to Tariff Water-PA P.U.C. No. 5, and PAWC's Pennsylvania-American Water Company – Wastewater Division's proposed Supplement No. 47 to Tariff Wastewater PA P.U.C. No. 16 until August 7, 2024, unless otherwise directed by Order of the Commission.

II. Discovery

CAUSE-PA supports the discovery modifications proposed by the Office of Consumer Advocate (OCA).

III. Settlement

CAUSE-PA is willing and ready to engage in settlement discussions in an attempt to resolve or narrow the issues in this proceeding, with any and all parties, and encourages the parties to engage in settlement discussions early in the process.

IV. Issues to be Presented

Continued delivery of safe, affordable water and wastewater services is of critical importance to the safety, welfare, and economic stability of all Pennsylvanians – particularly those with limited financial means. In the event the Commission approves any increase to PAWC's water and wastewater rates, it should condition approval on PAWC's agreement to perform such actions as are necessary to ensure service remains universally accessible to those who reside in PAWC's service territory and in compliance with all applicable sections of the Public Utility Code, Commission regulations and policy, and prior settlement agreements.

CAUSE-PA has conducted an initial review of PAWC's proposed tariff changes and testimony, and opposes PAWC's requests on the grounds that the proposed rate increases and

tariff changes may result in unjust and unreasonable rates that would impose severe financial hardship on low and moderate income residential customers. CAUSE-PA identifies the following specific issues of concern, which it intends to address in this proceeding, though it reserves the right to raise additional issues which may arise through the course of this proceeding:

- i. The conformity to law and the effect of PAWC's rate filing and proposed rate increases on low income households.
- ii. The effect of PAWC's rate filing and proposed rate increases on low income households enrolled in or eligible for PAWC's low income assistance programs, and adequacy of those programs in delivering universally accessible services.
- iii. The effect of PAWC's request to approve a Revenue Decoupling Mechanism and an Environmental Compliance Investment Charge, and whether these proposals are just, reasonable, in the public interest, and will not negatively impact PAWC's residential customers, including its low income customers.
- iv. Whether PAWC's proposed changes to its low income programs are adequate to remediate the effect of the proposed rate increase and modification on low income customers.

CAUSE-PA asserts that the issues identified above, along with any future issues identified by interested parties, must be thoroughly reviewed to ensure that all PAWC customers are able to access safe and affordable utility services. Without investigation of the above-stated issues, PAWC's tariff filing could result in unjust and unreasonable terms, conditions, and rates for critical water services that would impose severe hardship on the health, safety, and economic stability of residents in PAWC's service territory.

V. Witnesses and Testimony

CAUSE-PA intends to present the following witness to testify in this matter, but reserves the right to call additional or substitute witnesses as may be warranted upon proper notice to Your Honors and the parties:

Harry S. Geller, Esq.
118 Locust Street
Harrisburg, PA 17101
hgeller@pautilitylawproject.org

Mr. Geller will address the issues identified above, as well as other issues that may arise throughout this proceeding.

VI. Litigation Schedule

CAUSE-PA is actively involved in discussions with PAWC and other parties to reach a mutually agreeable litigation schedule and to determine the appropriate amount of hearing time needed in this matter. In the absence of an alternative schedule being agreed to by the parties prior to the prehearing conference in this matter, CAUSE-PA proposes the following schedule:

Public Input Hearings	Week of January 22, 2024 and/or week of January 29, 2024
Opposing Party Direct Testimony	February 2, 2024
Opposing Party Supplemental Direct Testimony Regarding Public Input Hearings	*Placeholder – may be needed depending on timing of Public Input Hearing and Direct Testimony
Rebuttal Testimony (all parties and all issues)	February 20, 2024
Surrebuttal Testimony (all parties and all issues)	March 4, 2024
Written Rejoinder or Outlines	March 6, 2024
Evidentiary Hearings (including oral rejoinder)	March 7, 8, 2024
Main Briefs	March 26, 2024
Reply Briefs	April 5, 2024

VII. Public Input Hearings

Given the size of the requested rate increases and the customer impact it may cause, CAUSE-PA respectfully requests that public input hearings be held in this matter.

VIII. Service on CAUSE-PA

CAUSE-PA is represented by the attorneys at the Pennsylvania Utility Law Project. All documents should be served on CAUSE-PA as follows:

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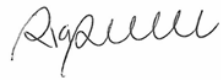
CAUSE-PA requests that parties agree to electronic service in this proceeding.

IX. Representation of CAUSE-PA at Prehearing Conference

At the Prehearing Conference, CAUSE-PA will be represented by Ria Pereira, Esq.

WHEREFORE, CAUSE-PA respectfully submits this Prehearing Conference Memorandum.

Respectfully submitted,
PENNSYLVANIA UTILITY LAW PROJECT
Counsel for CAUSE-PA



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December 28, 2023

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

Pennsylvania Public Utility Commission	:	
	:	
v.	:	Docket Nos. R-2023-3043189
	:	R-2023-3043190
Pennsylvania-American Water Company	:	

Certificate of Service

I hereby certify that I have this day served copies of the **Prehearing Memorandum of the Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania** upon the parties of record in the above captioned proceeding in accordance with the requirements of 52 Pa. Code § 1.54.

VIA Email Only

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Counsel for CAUSE-PA



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