

COMMONWEALTH OF PENNSYLVANIA



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June 27, 2024

**Via Electronic Filing**

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

Re: Pennsylvania Public Utility Commission  
v.  
Aqua Pennsylvania, Inc. and  
Aqua Pennsylvania Wastewater, Inc.  
Docket Nos. R-2024-3047822(Water)  
R-2024-3047824(Wastewater)

Dear Secretary Chiavetta:

Attached for electronic filing please find the Office of Consumer Advocate's Prehearing Memorandum in the above-referenced proceeding.

Copies have been served on the parties as indicated on the enclosed Certificate of Service.

Respectfully,

/s/Gina L. Miller  
Gina L. Miller  
Senior Assistant Consumer Advocate  
PA Attorney I.D. # 313863  
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Enclosures:

cc: The Honorable Gail M. Chiodo (*Email Only*)  
The Honorable Alphonso Arnold III (*Email Only*)  
Certificate of Service

CERTIFICATE OF SERVICE

Pennsylvania Public Utility Commission :  
v. : Docket Nos. R-2024-3047822(Water)  
Aqua Pennsylvania, Inc. and : R-2024-3047824(Wastewater)  
Aqua Pennsylvania Wastewater, Inc. :

I hereby certify that I have this day filed electronically on the Commission’s electronic filing system and served a true copy of the following document, the Office of Consumer Advocate’s Prehearing Memorandum, 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 27<sup>th</sup> day of June 2024.

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Office of Consumer Advocate  
555 Walnut Street  
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Harrisburg, PA 17101-1923

Date: June 27, 2024

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Pennsylvania Public Utility Commission	:	Docket Nos. R-2024-3047822
	:	R-2024-3047824
v.	:	
	:	
Aqua Pennsylvania, Inc and Aqua	:	
Pennsylvania Wastewater, Inc.	:	

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PREHEARING CONFERENCE MEMORANDUM  
OF THE  
OFFICE OF CONSUMER ADVOCATE

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Pursuant to the Prehearing Conference Order issued on June 18, 2024 in the above-captioned proceeding, by the Honorable Administrative Law Judges (ALJ) Gail M. Chiodo and Alphonso Arnold III, of the Office of Administrative Law Judge (OALJ) of the Pennsylvania Public Utility Commission (Commission), and pursuant to Section 333 of the Public Utility Code (Code), 66 Pa. C.S. § 333, the Commission’s regulations at 52 Pa. Code §§ 5.221-5.224, the Pennsylvania Office of Consumer Advocate (OCA) submits the following Prehearing Conference Memorandum.

**I. INTRODUCTION AND PROCEDURAL HISTORY**

On May 23, 2024, Aqua Pennsylvania, Inc. and Aqua Pennsylvania Wastewater, Inc. (collectively Aqua or the Company) filed Original Tariff Water – PA P.U.C. No. 4 and Original Tariff Sewer – PA P.U.C. No. 4, with the Commission. Through the combination of both tariff filings, the Company proposes to increase rates to produce additional overall revenues of \$126.7 million per year, an 18.9% increase in overall distribution revenue requirement. Aqua provides water distribution service to approximately 445,000 residential, commercial, and industrial

customers in portions of 31 counties across Pennsylvania. Aqua also provides wastewater service to approximately 56,000 residential, commercial, and industrial customers in portions of 17 counties across Pennsylvania.

Under the Company's proposal, the total bill for a residential water customer purchasing 3,870 gallons of water per month would increase by \$15.78-\$29.87 depending on rate zone, or by approximately 20.32%- 69%. Under the Company's proposal, the total bill for a residential wastewater customer utilizing 3,870 gallons per month would see anywhere from a \$31.83 decrease to a \$31.54 increase or a decrease of 23.33% to an increase of 84.75%. The Company has proposed increasing the monthly residential customer charge by 11%-75% for water customers depending on rate zone and, depending upon rate zones, a range of customer charge impacts that extends from a decrease of 12% to an increase of 121.7% for wastewater customers. The Company proposes a return on equity of 10.95% resulting in an overall rate of return of 7.90%, in conjunction with an equity-rich capital structure of 53.95% equity and 46.05% debt for ratemaking purposes.

On May 31, 2024, the OCA filed a Formal Complaint, Public Statement, and Notice of Appearance in this proceeding to protect the interests of consumers in the Company's service territory and to ensure that the Company is permitted to implement only a level of rates that is just and reasonable and in accordance with sound ratemaking principles.

On May 29, 2024, the Commission's Bureau of Investigation & Enforcement (I&E) filed a Notice of Appearance. On May 31, 2024, the Office of Small Business Advocate (OSBA) filed a Formal Complaint and Public Statement. On June 13, 2024 the Coalition for Affordable Utility Serve and Energy Efficiency in Pennsylvania (CAUSE-PA) filed a petition to intervene and an answer.

On June 13, 2024, the Commission issued Orders that initiated an investigation into the lawfulness, justness, and reasonableness of the proposed rate increases in Aqua's filings, in addition to the Company's existing rates, rules, and regulations, assigned these matters to the OALJ for further proceedings as appropriate, and suspended the effective date of the tariffs until February 22, 2025.

## **II. ISSUES**

Based upon a preliminary analysis of the Company's general rate increase filings, the OCA has compiled a list of issues and sub-issues which it anticipates will be included in its investigation of the Company's rate requests. It is anticipated that other issues may arise and may be pursued once the answers to all the OCA's interrogatories have been received and analyzed. The issues and sub-issues set forth below, and others that may develop during discovery, will be analyzed and presented as appropriate by the OCA with the assistance of its expert witnesses:

### **A. Rate of Return**

1. The OCA will perform a detailed analysis of the cost of common equity claimed by the Company as well as the overall rate of return as claimed by the Company. Also, the OCA will carefully examine the Company's methodologies and supporting data used to develop its final cost of common equity claim.

2. The OCA will examine whether the capital structure proposed by the Company is representative of the period in which rates will be in effect and is otherwise appropriate for ratemaking purposes.

3. The OCA will examine the embedded cost of debt claimed by the Company to determine whether it is reasonable and appropriate for ratemaking purposes.

4. The OCA will examine whether any company-specific adjustments proposed by the Company are justified.

### **B. Rate Base/ Measure of Value**

1. The OCA will examine the reasonableness and accuracy of Company's projections related to the utility plant in service at the time relevant to this proceeding.

2. The OCA will review the Company's claim for plant additions during the FTY and FPFTY.

3. The OCA will examine claims related to the Company's acquisitions, including acquisitions that are included in its filing that have closed but that were reversed on appeal such as the Company's claim for the East Whiteland Township system, as well as its other included acquisitions, and determine how acquisitions that are not yet final or certain should be treated for rate base purposes. Additionally, the OCA will examine issues to ensure that the acquisitions adjustments reflected in the filings comply with the requirements set forth in Section 1327 and Section 1329 of the Public Utility Code, as applicable. The OCA will examine issues related to deferred capital expenses related to acquisitions and potential acquisitions.

4. The OCA will investigate whether the Company's adjustment to rate base for depreciation reserve is appropriate.

5. The OCA will examine the Company's projections of non-investor supplied funds, including but not limited to, customer deposits, customer advances for construction, and contributions in aid of construction.

6. The OCA will examine the Company's proposal to include unamortized balances in rate base.

7. The OCA will examine the Company's claim for materials and supplies.

8. The OCA will examine the Company's calculation and amount of cash working capital.

9. The OCA will examine the reasonableness and lawfulness of rate base claims for amounts paid to affiliates, in accordance with Section 2101 of the Public Utility Code. 66 Pa. C.S. § 2101 *et seq.*

10. The OCA will examine the Company's Accumulated Deferred Income Tax (ADIT) balances and excess ADIT balances.

11. The OCA will examine the reasonableness of the Company's proposed AFUDC for land held for future use.

C. Revenues and Expenses

1. The OCA will examine the Company's claimed revenues and any adjustments to the level of revenues.

2. The OCA will seek to ascertain whether the Company's claimed expenses are supported, reasonable, and appropriate.

3. The OCA will examine whether the projected number of customers in the FTY and FPFTY are reasonable and accurate.

4. The OCA will examine whether the Company's claims of sales and revenues during the FTY and FPFTY are reasonable and accurate.

5. The OCA will examine whether the Company's projections of revenues in the future periods are reasonable and accurate including, but not limited to, its billed days adjustments, metered sales and the impact of conservation measures, and miscellaneous revenue adjustments.

6. The OCA will examine whether the Company's projections of number of employees, overtime, and incentive pay are reasonable and accurate.

7. The OCA will examine the costs associated with the accrual of retirement benefits other than pensions for the Company's employees or contributions to pension funds.

8. The OCA will examine the justness and reasonableness of the Company's employee healthcare expense.

9. The OCA will examine the appropriateness of the Company's pro forma claim for rate case expense.

10. The OCA will examine the reasonableness of the Company's proposed purchased power expense claims.

11. The OCA will examine the Company's request for depreciation expenses to determine whether it is just and reasonable.

12. The OCA will examine the justness and reasonableness of the Company's claim for insurance costs.

13. The OCA will examine the justness and reasonableness of the Company's proposed expense amortizations.

14. The OCA will examine the justness and reasonableness of the Company's claim for regulatory commission costs.

15. The OCA will examine the justness and reasonableness of the Company's claims for other operations and maintenance expenses.

16. The OCA will examine the justness and reasonableness of the Company's claims for service company expenses, including the allocated expenses of affiliated interests.

17. The OCA will examine the justness and reasonableness of the Company's claimed rate case normalization period.

18. The OCA will examine any cost savings identified in the most recent Management and Operations Audit should be reflected, if relevant, which was conducted since the Company's prior general rate increase request was filed.

19. The OCA will examine the justness and reasonableness of the Company's claimed uncollectibles expense.

20. The OCA will examine the Company's claimed revenues and any adjustments to the level of revenues.

21. The OCA will examine the justness and reasonableness of Aqua's request to defer costs it anticipates expending well beyond the FPFTY levels for projected treatment expenses related to per-and polyfluoroalkyl substances (PFAS).

D. Taxes

1. The OCA will examine issues related to the calculation of taxes including, but not limited to, calculation of federal and state income taxes and the amount of those taxes included as expenses for ratemaking purposes and will examine whether the Company is in compliance including with Act 40 of 2016 (66 Pa. C.S. § 1301.1).

2. The OCA will examine the reasonableness of the Company's proposal regarding the tax repairs deductions, and its claims for income taxes, property taxes, and general assessments.

3. The OCA will examine the effect of the Tax Cuts and Jobs Act on the Company's tax expense and its ADIT accounts and the amount, if any, that needs to be returned to ratepayers as a result.

4. The OCA will examine the Company's level of PURTA and property tax expense.

E. Rate Structure/ Cost of Service / Rate Design/ Tariffs/ Alternative Ratemaking

1. The OCA will examine the reasonableness of Company's proposed distribution or allocation of the revenue increase among customer classes to determine whether the proposal meets all legal requirements and sound ratemaking principles.

2. The OCA will examine Company's cost of service studies, including the methodology used and the reasonableness of the allocations.

3. The OCA will examine the reasonableness and appropriateness of the Company's proposed tariff changes, including all proposed surcharges.

4. The OCA will examine all other cost allocation and rate design proposals.

5. The OCA will examine whether Aqua's proposal to allocate \$21.85 million of its claimed wastewater revenue requirement to water customers under Section 1311(c) is in the public interest and whether it would produce just and reasonable rates.

F. Depreciation

1. The OCA will examine the Company's depreciation study, including the proposed service lives, net salvage rates, and depreciation rate calculations to determine if they are reasonable.

2. The OCA will analyze the depreciation rates based upon the actuarial analysis to determine if any modifications are necessary.

G. Low-Income Programs

1. The OCA will analyze current and proposed Company operations, practices, procedures and outreach related to serving low-income customers.

2. The OCA will assess the impact of the Company's proposed rate increase on universal service, including the overall costs of Customer Assistance Program (CAP) and Aqua Aid as affected by the Company's rate design.

3. The OCA will examine how Company's proposed rate increase, rate structure and proposed new alternative ratemaking and new surcharges will affect low-income and/or low-usage customers.

4. The OCA will review the Company's current bill discount programs, arrearage management programs, or lack thereof, and proposed changes to the programs.

5. The OCA will review the Company's affordability analysis.

H. Quality of Service

1. The OCA will review the Company's quality of service to ensure that it is providing safe, adequate, and reliable service that is consistent with the requirements of Section 1501 of the Public Utility Code.

2. The OCA will investigate the quality of service complaints by the Company's customers.

I. Customer Service

1. The OCA will review the Company's consumer protection policies and programs in order to ensure compliance with Chapter 14 of the Public Utility Code and Chapter 56 of the Commission's regulations.

2. The OCA will examine the Company's customer service, including performance trends, internal training, management oversight, policies, and programs.

3. The OCA will examine the Company's consumer education programs, particularly with regard to changes in billing and collection rights and remedies, and complaint processes.

4. The OCA will examine the Company's compliance and reporting as required in the last rate case concerning service and service quality.

5. The OCA will examine the Company's request for a management performance adder to its return on equity and rate of return in light of the Company's customer service performance.

6. The OCA will examine the Company's response to the most recent Commission Management Audit.

J. Other Issues

1. The OCA will examine any relevant issues that arise as a result of the Company's operations.

2. The OCA will investigate to ensure that the Company is complying with all prior orders.

3. The OCA reserves the right to examine other issues affecting the Company's revenue requirements, rates, charges, and other tariff provisions as they are identified through discovery.

**III. WITNESSES**

The OCA intends to present the direct, supplemental direct, rebuttal, and surrebuttal testimonies, as may be necessary, of the below witnesses. Each witness will present testimony in written form and will attach various exhibits, documents, and explanatory information, as may be necessary. In order to expedite the resolution of this proceeding, the OCA requests that copies of all interrogatories, testimony, and answers to interrogatories be mailed and/or emailed directly to the OCA's group email formed particularly for this proceeding.

Regulatory Policy/Quality of Service

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Customer Service / Tariff / Quality of Service

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The OCA specifically reserves the right to call additional witnesses, as necessary, and retains the flexibility to have the witnesses above address other areas of this case as the case proceeds. If the OCA determines that additional witnesses will be necessary for any portion of its case, it will notify all parties of record immediately.

#### IV. PROPOSED SCHEDULE

The OCA proposes the schedule below, with the understanding that I&E, OSBA, and CAUSE-PA could accept this schedule.<sup>1</sup> While consideration is pending, the OCA remains committed to working with the Company, all parties, and the ALJs, on a procedural schedule that is a reasonable compromise of the parties' competing interests within the time afforded for litigation of this matter. The OCA proposes the following schedule:

<b>OCA's Proposed Litigation Schedule</b>	
Public Input Hearings	TBD/OCA suggests the week of July 29
Other Parties' Direct Testimony	Friday, August 16, 2024
Opposing Party Supplemental Direct Testimony Regarding Public Input Hearings	May be needed depending on timing of public input hearings and other party direct testimony. If needed, OCA proposes that it be submitted on the Rebuttal Testimony deadline.
Rebuttal Testimony (all parties and all issues)	Thursday, September 10, 2024
Surrebuttal Testimony (all parties and all issues)	Thursday, September 26, 2024
Oral Rejoinder Outline/Written Rejoinder	Monday, October 3, 2024
Evidentiary Hearings (telephonic)	Wed, October 9- Friday, October 11, and Tuesday, October 15, 2024 <sup>2</sup>
Main Briefs	Monday, October 28, 2024
Reply Briefs	Thursday, November 7, 2024

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<sup>1</sup> The OCA will defer to these parties to represent their positions on scheduling during the Prehearing Conference. Additionally, the OCA notes that its suggested dates for public input hearings and proposal for the submission of Supplemental Direct testimony, if necessary, are raised for the first time in this memo due to timing and therefore they not been vetted by other parties as of the date of this memo.

<sup>2</sup> OCA witness Ralph Smith has an unavoidable conflict and is only available to testify telephonically on Oct. 15 or later. OCA has informed Aqua, OSBA, I&E, and CAUSE-PA of this conflict.

The OCA requests that the dates included in any litigation schedule in this matter be considered “in-hand” dates and that electronic service on the due date will satisfy the “in-hand” requirement.

## **V. PUBLIC INPUT HEARINGS**

The OCA will be prepared to discuss public input hearings at the prehearing conference. Given the magnitude of the requested rate increase, the size of the customer base, and the requests for public input hearings and complaints received thus far in this matter, the OCA respectfully requests that both in-person and telephonic public input hearings be held for the Company’s customer base impacted by this rate filing.

Attached as Appendix A is the OCA’s proposed draft Notice for the Public Input Hearing (to be completed with details as determined by the presiding ALJs). The OCA requests the following:

A. Given the size of the customer base and service territory, a minimum of eight (8) Public Input Hearings be held, five in-person and three telephonic.

B. The in-person public input hearings include a combination of daytime and evening hearings at different locations with accessible and free parking or easy access to public transportation.

C. The telephonic public input hearings include a combination of daytime and evening hearings.

D. Pre-registration should not be required. If required, or encouraged it should be for telephonic hearings only, and if required, pre-registration be required by 10:00 a.m. on the day of the telephonic Public Input Hearing at which the witness seeks to testify.

E. Hearing exhibits be required to be submitted to the ALJs by 10:00 a.m. the day before the Public Input Hearing at which the witness seeks to testify.

F. The Commission’s notice of the Public Input Hearings should include the phone numbers and access codes necessary for participants to use to fully access all telephonic Public Input Hearings.

G. The Company should be required to, at a minimum, generate a notice of the Public Input Hearings that contains relevant information as to date, time, location, and phone numbers and access codes and further be required to advertise the notice: (1) in the general readership section (not legal section) of local newspapers within the service territory; (2) on its website; and (3) in social media posts which the Company utilizes to advertise generally.

H. That the other parties involved in the proceeding, including the OCA, be permitted to review these public input announcements prior to their publication and distribution and have input into which publications the ads are placed.

## **VI. DISCOVERY**

In conjunction with its proposed schedule, the OCA proposes the following modifications to the Commission's procedural rules regarding discovery. The OCA requests that the Presiding Officers direct that the modifications will take effect when addressed during the on the record prehearing conference and apply to all future discovery requests served on and after the date of the prehearing conference July 1, 2024.

- A. Answers to written interrogatories and requests for document production, entry for inspection, or other purposes shall be served in-hand within ten (10) calendar days of service.
- B. Objections to interrogatories and/or requests for production shall be communicated orally to the propounding party within three (3) calendar days of service of the interrogatories; unresolved objections shall be served in writing to the propounding party within five (5) calendar days of service of the interrogatories and/or requests for production.
- C. Motions to dismiss objections and/or direct the answering of interrogatories and/or requests for production shall be filed within three (3) calendar days of service of written objections.
- D. Answers to motions to dismiss objections and/or answering of interrogatories and/or requests for production shall be filed within three (3) calendar days of service of such motions.
- E. Requests for admissions will be deemed admitted unless answered within ten (10) calendar days or objected to within five (5) calendar days of service.
- F. Answers to on-the-record data requests shall be served in-hand within five (5) calendar days of the requests.

- G. Any discovery or discovery-related pleadings (such as objections, motions, and answers to same) served after served after 4:30 p.m. Monday through Thursday or after 1:30 p.m. on a Friday or the day before a holiday will be deemed to have been served on the next business day for purposes of calculating the due date for any responsive filing.

After rebuttal is served, the OCA proposes that the deadlines should be reduced as follows:

- A. Answers to interrogatories and responses to requests for document production, entry for inspection, or other purposes shall be served within five (5) calendar days of service of the interrogatories or requests for production.
- B. Objections to interrogatories and/or requests for production shall be communicated orally to the propounding party within three (3) calendar days of service; unresolved objections shall be served on the propounding party in writing within four (4) calendar days of service of the interrogatories and/or requests for production.
- C. Motions to dismiss objections and/or direct the answering of interrogatories and/or requests for production shall be filed within two (2) calendar days of service of written objections.
- D. Answers to motions to dismiss objections and/or direct the answering of interrogatories and/or requests for production shall be filed within two (2) calendar days of service of such motions.
- E. Requests for admission shall be deemed admitted unless answered or objected to within three (3) calendar days of service.
- F. Discovery requests and discovery related pleadings (such as objections, motions, and answers to same) served after 4:30 p.m. Monday through Thursday or after 1:30 p.m. on a Friday or the day preceding a holiday shall be deemed to have been served on the next business day.

## **VII. OCA COUNSEL / SERVICE ON THE OCA**

The OCA will be represented in this case by the attorneys listed below. During the prehearing conference, Gina Miller will speak as lead attorney for the OCA.

Melanie Joy El Atieh, Deputy Consumer Advocate  
Gina L. Miller, Senior Assistant Consumer Advocate  
Jacob Guthrie, Assistant Consumer Advocate  
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Phone: (717) 783-5048  
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The OCA has created a group e-mail address provided above. This is the only email address that is required for service on the OCA; it will provide the emailed materials to all members of the OCA team including the consultants listed above.

The OCA requests that service by email by 4:30 p.m. on the due date will satisfy the in-hand service requirement, without the need for follow-up hard copies to the parties.

### **VIII. COMMON BRIEFING OUTLINE**

Attached as Appendix B is the OCA's proposed common briefing outline. The OCA requests that, when the ALJs issue their Instructions for Briefs, the common outline provided by the ALJs will include Roman numeral-level headers for an Overall Position on Rate Increase section following the Summary of Argument section, as well as Customer Service / Quality of Service, Customer Assistance Programs, and Tariff Issues (not otherwise briefed) sections of the brief which follow Rate Structure / Rate Design and precede the Conclusion. The OCA also recommends removing the "Fair Value" second-level heading from the Rate Base section.

**IX. SETTLEMENT**

The OCA will participate in settlement discussions in this matter.

Respectfully submitted,

/s/ Gina L. Miller

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Counsel for:  
Patrick M. Cicero  
Consumer Advocate

DATED: June 27, 2024

OCA APPENDIX A

NOTICE OF IN-PERSON AND TELEPHONIC PUBLIC INPUT HEARINGS

For Aqua Pennsylvania, Inc and Aqua Pennsylvania Wastewater, Inc. Rate Increase Requests

Docket Nos.

R-2024-3047822

R-2024-3047824

The Pennsylvania Public Utility Commission (PUC) will conduct [#] Public Input Hearings concerning the general rate increase requests filed by Aqua Pennsylvania, Inc and Aqua Pennsylvania Wastewater, Inc. on May 23, 2024, seeking to increase water and wastewater distribution rates by \$126.7 million per year. The in-person and telephonic hearings will be held at the following times and places:

**Presiding Officers: Administrative Law Judge Gail M. Chiodo and Alphonso Arnold III**

**IN-PERSON PUBLIC INPUT HEARINGS**

**Pre-registration is not required.**

Date: [Here]

Time: [Here]

Location: [Here]

Date: [Here]

Time: [Here]

Location: [Here]

Date: [Here]

Time: [Here]

Location: [Here]

Date: [Here]

Time: [Here]

Location: [Here]

**TELEPHONIC PUBLIC INPUT HEARINGS**

**Pre-registration is [encouraged/required]. Read below.**

Date: [Here]

Time: [Here]

Pre-registration is [encouraged/required] by [same day] at 10AM.

Date: [Here]

Time: [Here]

Pre-registration is [encouraged/required] by [same day] at 10AM.

Toll-free Conference Number: xxx.xxx.xxxx

PIN Number: xxxxxxxx

- You must dial the toll-free Conference number above
- You must enter the PIN number above when instructed
- You must speak your name when prompted, and press #
  - Then, the telephone system will connect you to the hearing

**PRE-REGISTRATION FOR TELEPHONIC PUBLIC INPUT HEARINGS:** To testify at the telephonic Public Input Hearings, pre-registration is [encouraged/required] by [day of the hearing] at 10AM. Failure to pre-register could result in you not being called to testify by the PUC judge. To pre-register to testify by telephone, please contact the PUC Judge's Legal Assistant, [name], by email at [email address] or by phone at [xxx.xxx.xxxx] and provide the requested information.

**NEED ASSISTANCE WITH PRE-REGISTRATION?** If you need assistance pre-registering to testify, you may have someone register for you, but they will need to provide the PUC Judge all the information listed above. Additionally, if more than one person in your household would like to testify, one person may pre-register for other individuals in the same household by providing the PUC Judge's Legal Assistant with the above-listed information for each individual.

**REQUESTS FOR INTERPRETERS:** If you require an interpreter, please pre-register as soon as possible. If you register too close to the hearing date, we may not have enough time to arrange for an interpreter. If you request an interpreter, the PUC will make reasonable efforts to have one present. AT&T Relay Service number for persons who are deaf or hearing-impaired: 1-800-654-5988.

**HEARING EXHIBITS:** If you have any hearing exhibits to which you will refer during the hearing, please email them to the PUC Judge's Legal Assistant, [name], at [email address]. The PUC Judge will forward your exhibits to all the parties. Exhibits for the public input hearing must be received by the PUC Judge by [the day before the hearing] at 10AM.

**QUESTIONS?** The Pennsylvania Office of Consumer Advocate (OCA) represents the interests of utility customers before the PUC. If you have questions about the public input hearings or the Company's requested rate increase, please contact the OCA toll free at 1-800-684-6560 or by email at [consumer@paoca.org](mailto:consumer@paoca.org). Additionally, the OCA can help customers pre-register for the Public Input Hearings.

**OTHER WAYS TO BE HEARD:** If you want to be heard about the proposed rate increase but do not want or cannot testify at the Public Input Hearings, you may file a formal complaint or comment to the proposed rate increase. Please visit the PUC's website to use the applicable form available at <https://www.puc.pa.gov/complaints/formal-complaints/>

## OCA APPENDIX B

### OCA's Proposed Common Briefing Outline For General Rate Increase Proceeding

- I. Introduction
- II. Summary of Argument
- III. Overall Position on Rate Increase
- IV. Rate Base
  - A. Plant in Service
  - B. Depreciation Reserve
  - C. Additions to Rate Base
  - D. Deductions from Rate Base
- V. Revenues
- VI. Expenses
- VII. Taxes
- VIII. Rate of Return
- IX. Rate Structure and Rate Design
  - A. Cost of Service Study
  - B. Revenue Allocation
  - C. Rate Design/ Tariff Structure
  - D. Summary and Alternatives
- X. Alternative Ratemaking
- XI. Customer Service / Quality of Service
- XII. Customer Assistance Programs
- XIII. Tariff Issues (Not Briefed Above)
- XIV. Miscellaneous Issues
- XV. Conclusion

Note: Appropriate modifications may be made. For instance, a party might add "Affiliated Interest Expenses" as a major topic heading or might brief only rate structure and not use other topic headings. A summary and alternatives should be provided under "Rate Structure" but the "Rate Base" and "Rate Structure" formats shown may be modified, as appropriate. Additional subheadings should be used, as appropriate.