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June 27, 2024

VIA ELECTRONIC FILING

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
P.O. Box 3265
Harrisburg, PA 17105-3265

RE: *Pennsylvania Public Utility Commission, et al. v. Aqua Pennsylvania
Wastewater, Inc.* Docket No. R-2024-3047824

Dear Secretary Chiavetta:

Enclosed for electronic filing please find SCH USA, LLC's Prehearing Memorandum with regard to the above-referenced matter. Copies to be served in accordance with the attached Certificate of Service.

Thank you for your attention to this matter.

Sincerely,

/s/ Renardo L. Hicks

Renardo L. Hicks
Lauren Burge
Bryce R. Beard

RLH/jls
Enclosures

cc: Hon. Gail M. Chiodo w/enc.
Hon. Alphonso Arnold III w/enc.
Cert. of Service w/enc.

CERTIFICATE OF SERVICE

I hereby certify that this day I served a true and correct copy of SCH USA, LLC's Prehearing Memorandum upon the following persons, in the manner indicated, in accordance with the requirements of 52 Pa. Code § 1.54.

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/s/ Renardo L. Hicks

Renardo L. Hicks, Esquire

Date: June 27, 2024

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission :
 :
 v. : Docket No. R-2024-3047824 (Wastewater)
 :
 Aqua Pennsylvania Wastewater, Inc. :

**PREHEARING MEMORANDUM
OF SCH USA, LLC**

Pursuant to 52 Pa. Code §§ 5.72-5.75, the Prehearing Conference Order dated June 18, 2024, and subject to the granting of its Petition to Intervene filed on June 27, 2024, SCH USA, LLC (“SCH USA”) submits this Prehearing Memorandum.

I. BACKGROUND

On May 23, 2024, Aqua Pennsylvania Wastewater, Inc. (“Aqua” or the “Company”) filed Original Tariff Sewer – PA P.U.C. No. 4 (“Tariff No. 4”) with the Pennsylvania Public Utility Commission (“Commission”) to become effective July 22, 2024. Through the tariff filing, Aqua proposes to increase its total wastewater annual operating revenues by approximately \$14.6 million, or 20.1%. By an Order entered on June 13, 2024, the Commission suspended the rate increase proposed by Tariff No. 4 for further investigation until February 22, 2025, unless permitted by Commission Order to become effective at an earlier date. A telephonic prehearing conference has been scheduled for July 1, 2024 before Administrative Law Judges (“ALJs”) Gail M. Chiodo and Alphonso Arnold III.

SCH USA owns and operates a large commercial resort property known as the Split Rock Resort, which is located in Lake Harmony, Kidder Township, Carbon County, Pennsylvania. The Split Rock Resort receives wastewater service from Aqua, and as such SCH USA is an Aqua

wastewater customer. SCH USA receives non-residential wastewater service from Aqua in Rate Zone 4. Additionally, as an unmetered customer, SCH USA is currently billed by Aqua on a per Equivalent Dwelling Unit (“EDU”) basis. Under Aqua’s proposals, SCH USA’s wastewater rates would be significantly increased, thereby affecting the operations of the Split Rock Resort property.

II. ISSUES

As explained in its Petition to Intervene, SCH USA intends to examine and potentially address issues in this proceeding including the amount of Aqua’s proposed rate increase, as well as the method by which SCH USA, as an unmetered customer, is charged for wastewater service. SCH USA is continuing to evaluate the Company’s proposals, and will also examine the issues raised by other parties and consider the impact of any alternative proposals on SCH USA’s existing and future rates. As such, SCH USA reserves the right to raise other issues identified through its continued review and analysis in this case.

III. DISCOVERY

SCH USA is not proposing any discovery modifications at this time but is willing to work with the parties to implement modifications to discovery procedures if necessary.

IV. PROCEDURAL SCHEDULE

SCH USA will cooperate with the parties and presiding officers to develop a reasonable procedural schedule.

V. HEARINGS

At this time, SCH USA continues to evaluate the issues in this proceeding and is unable to estimate the amount of hearing time (if any) that may be needed. SCH USA prefers that any evidentiary hearing be held telephonically.

VI. WITNESSES

SCH USA is still considering whether to present testimony in this matter. SCH USA reserves the right to present a witness or witnesses, as may be necessary, depending on the course of the proceeding. If SCH USA decides to present testimony, SCH USA will provide reasonable notice to the ALJs, as well as the parties. SCH USA also reserves its right to add or change the identify of its witnesses at any time, upon appropriate notice to the ALJs and the parties.

VII. POSSIBILITY OF SETTLEMENT

SCH USA is willing to participate in settlement discussions with the parties in order to resolve or narrow the issues in this matter.

VIII. SERVICE OF DOCUMENTS

SCH USA's attorneys in this matter are:

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SCH USA prefers that documents be served electronically to the above email addresses and agrees to receive service of documents electronically in this proceeding. Additionally, Lauren Burge will speak as the lead attorney for SCH USA for purposes of the prehearing conference.

Respectfully submitted,

/s/ Renardo L. Hicks

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Dated: June 27, 2024

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