

Mahendra Orilall
1216 Jackson Drive
Downingtown, PA 19335
408-605-3409
chrisorilall@gmail.com

Jan 7, 2025

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

Re: Mahendra Orilall v. Community Utilities of Pennsylvania, Inc.; Docket No. C-2024-3052124; RESPONSE to Community Utilities of Pennsylvania, Inc.'s (CUPA) preliminary objections to formal complaint

Dear Secretary Chiavetta:

Pursuant to 52 Pa. Code § 5.61, please find my response to CUPA's Preliminary Objections (filed on Dec 30, 2024). I only have 10 days it seems to respond, and I am not privileged to have legal representation (as yet) like CUPA. In the limited time and resources allocated to me, an average consumer, I will capture why the Complaint should not be dismissed.

To begin with, I would like to note that there are other formal complaints like my own to this very matter (e.g., in my community alone that I know of, much less CUPA's entire customer base I reckon), e.g., C-2024-3052445 and may other informal cases (e.g., Case #4030168) in progress over the outrageous new billing method. Therefore, PUC should be taking this complaint and the other similar ones seriously because it is in the public interest. I am not sure what volume of complaints or specific legal course will be required to establish that fundamentally, CUPA cannot and should not bill consumers for services not rendered. By law, Section 315(a) of the Code, 66 Pa. C.S. § 315(a) even states that "the burden of proof to show that the rate involved is just and reasonable shall be upon the public utility". I will cite that the phrase 'or existing rate' is stated in that section if ambiguity still remains. CUPA and its legal team did not and has not to-date (by their legal response or the numerous phone calls by its customers) justified why or how their new wastewater rate (in some cases \$1000/ month) is just and reasonable.

Furthermore, as will be argued, we seem to be going in circles because CUPA's initial flat rate proposal was rejected because of the same cost-of-service principles arguments (*Pa. PUC et al v. Community Utilities of Pennsylvania Inc.*, Docket Nos. R-2021-3025206 et al. Opinion and Order at 15 (entered January 13, 2022) ("2021 Base Rate Case")):

"The OCA further stated that the Company's proposed flat rates are inconsistent with cost-of-service principles because customers are not billed for their actual use of CUPA-Wastewater's system."

However, as will be shown, to revert the other vast majority of CUPA's customer base (roughly 85%) to a metered rate system is quantitatively worse/ more inaccurate (see table below using CUPA's own data) and against public interest. The primary reason is that CUPA has no infrastructure for measuring wastewater volume nor have they established any correlation between a customer's total water

consumption and that customer's wastewater volume into CUPA-Wastewater system. I am sure the PUC has other current formal complaints that corroborates this notion, i.e., more elaborate examples where CUPA has shamelessly billed customers over \$500/month (up from \$74.73/month) with their new flawed rates (e.g., C-2024-3052445). These cases (like my own) will show that those customers' wastewater volume output are at 'typical usage levels' or in other words, those customers are outputting typical wastewater volumes to CUPA-Wastewater System but their water consumption difference is mainly due to outdoor (irrigation or evaporation) usage. Accordingly, we are being billed ridiculous amounts for not actual use of CUPA-Wastewater's system, which we will continue to implore PUC to act upon immediately if CUPA does not desist.

I would like to also point out that The PUC Consumer Rights and Responsibilities Booklet states that consumers have the right to:

- Know how your utility bill is calculated.
- Check your utility bill for accuracy.
- Question or disagree with the utility company.

To-date, CUPA has not explained how their current billing accounts for actual use of CUPA-Wastewater system (either by the numerous attempt to contact the utility or by their lengthy legal response which only cites legal loopholes and attempts to pin this on the PUC, which would imply that the Commission did in fact approve CUPA to legally bill consumers for services not render, i.e., legally bill customers for not actual use of CUPA-Wastewater system?)

Lastly, I do not have an outstanding balance because CUPA served me with a notice of discontinuation on Nov 20, 2024 (see attachment A), plus CUPA started to tack on late payment fees. I called CUPA Customer Service and the agent did not give me an option to not pay while the dispute is ongoing. Therefore, CUPA gave me no other option. As PUC Consumer Rights and Responsibilities Booklet states that 'The utility has the right to terminate your service for non-payment of undisputed bills', I chose to pay in full because of fear of termination of service.

To clarify, I am seeking full compensation/ fair settlement of what CUPA overcharged for services not rendered and adjustment of rates going forward for myself and all CUPA customers affected by this erroneous rate increase. To re-iterate, I firmly believe (and the data below and facts will show) that the current settlement rates are not accurate, the methodology of assuming water in = water out (to CUPA Wastewater System) is flawed and not in line with the Commission Settlement or the Settlement was based on erroneously presented numbers. CUPA needs to adjust their rates to meet the PUC settlement (approved total annual revenue increase) and address the inaccuracies in current rate methodology to account for only use of CUPA-Wastewater system. Given that CUPA continues to bill all customers at these wrong rates, I urge the Commission to prioritize and expedite this complaint. Please find details to corroborate the above summary:

FALSE TOTAL ANNUAL REVENUE INCREASE BY NEW RATES & METHOD

As will be demonstrated with the data provided by CUPA themselves in their Preliminary Objection, CUPA's projected annual revenue increase is much higher than what was publicly announced/ published (\$1.4M) by PUC on 8/1/2024. Therefore, is that a clear and obvious violation of the Commission Order/ settlement or was the settlement based on erroneous numbers, which makes

that settlement null and void? Either way, the burden of proof is on CUPA to establish that even the settled rates are just and reasonable as per Section 315(a) of the Code, 66 Pa. C.S. § 315(a).

By using the data provided by CUPA themselves in Appendix F “Customer Bill Impacts’ Attachment C and calculating aggregates, one will see that the CUPA stands to get \$6.3M annually from these new settlement rates and historic volume consumption (up from \$3.6M annually using the prior rates). This ~ \$2.6M total increase higher than Commission approved \$1.4M annual revenue increase! Is this what the Commission approved in the settlement? Again, the onus is on CUPA to establish that even the settlement rates are just and reasonable as per Section 315(a) of the Code, 66 Pa. C.S. § 315(a).

Even simple math will show that the \$1.4M annual revenue increase for (approx.) 3832 customers = \$365 increase per year or \$30.34/ month increase. How is it possible that some customers are thus getting over \$1000/ month bills? That equates to \$10k/ year increase for a single customer? How is that just and reasonable? and again, the onus is on CUPA prove that that amount billed is for services used by that customer to CUPA Wastewater System (cost-of-service principles OCA used in the original 2021 Base Rate Case Docket Nos. R-2021-3025206). If that customer output that much wastewater into CUPA Wastewater System, then it is just and reasonable but if they did not, CUPA should not be billing such erroneous numbers to customers.

A closer look at the data will show that 46% of customers will be getting monthly bills of \$111.90 to \$219.90! If they are indeed putting that much volume of wastewater into CUPA Wastewater System, then this could be justified but I am willing to bet that this is not the case because CUPA does not have the infrastructure to measure each customer’s wastewater volume, nor do they want to adopt a deduct metering system. Therefore, the data itself is showing that over 50% of CUPA’s customer stand to be incorrectly billed by this flawed method of assuming that water in = water out to CUPA Wastewater System.

I want to note that the onus is on CUPA to come up with a better method using metered in water, e.g., a customer’s winter water consumption is a much better indicator of the volume of wastewater that customer puts into CUPA Wastewater System. Apartments & condos will stay relatively the same throughout the year but home with large properties will definitely spike water consumption once Spring comes around and continue through Fall. Conservation of water is definitely encouraged and if the Water Provider raised bills to promote this is one matter but definitely not by the Wastewater Company charging for water that goes into the ground or is evaporated!

	A	B	C	D	E	F	G	H
1	consolidated service	test year count	count %	Prior Rates	Annual revenue (with prior rates)	Settlement Rates	New Annual Revenue (with settlement rates)	Annual Delta (settlement vs prior)
2	1000	4987	10%	\$ 74.73	\$ 372,678.51	\$ 57.80	\$ 288,248.60	\$ (84,429.91)
3	2000	5714	12%	\$ 74.73	\$ 427,007.22	\$ 75.90	\$ 433,692.60	\$ 6,685.38
4	3000	7423	15%	\$ 74.73	\$ 554,720.79	\$ 93.90	\$ 697,019.70	\$ 142,298.91
5	4000	7061	15%	\$ 74.73	\$ 527,668.53	\$ 111.90	\$ 790,125.90	\$ 262,457.37
6	5000	5732	12%	\$ 74.73	\$ 428,352.36	\$ 129.90	\$ 744,586.80	\$ 316,234.44
7	10000	9149	19%	\$ 74.73	\$ 683,704.77	\$ 219.90	\$ 2,011,865.10	\$ 1,328,160.33
8	20000	1123	2%	\$ 74.73	\$ 83,921.79	\$ 399.90	\$ 449,087.70	\$ 365,165.91
9	30000	145	0%	\$ 74.73	\$ 10,835.85	\$ 579.90	\$ 84,085.50	\$ 73,249.65
10	40000	33	0%	\$ 74.73	\$ 2,466.09	\$ 759.90	\$ 25,076.70	\$ 22,610.61
11	50000	12	0%	\$ 74.73	\$ 896.76	\$ 939.90	\$ 11,278.80	\$ 10,382.04
12	60000	8	0%	\$ 74.73	\$ 597.84	\$ 1,119.90	\$ 8,959.20	\$ 8,361.36
13	70000	8	0%	\$ 74.73	\$ 597.84	\$ 1,299.90	\$ 10,399.20	\$ 9,801.36
14	80000	6	0%	\$ 74.73	\$ 448.38	\$ 1,479.90	\$ 8,879.40	\$ 8,431.02
15	90000	6	0%	\$ 74.73	\$ 448.38	\$ 1,659.90	\$ 9,959.40	\$ 9,511.02
16	100000	4	0%	\$ 74.73	\$ 298.92	\$ 1,839.90	\$ 7,359.60	\$ 7,060.68
17	Tamiment							\$ -
18	1000	2434	5%	\$ 40.13	\$ 97,676.42	\$ 57.80	\$ 140,685.20	\$ 43,008.78
19	2000	1337	3%	\$ 54.11	\$ 72,345.07	\$ 75.90	\$ 101,478.30	\$ 29,133.23
20	3000	1118	2%	\$ 68.09	\$ 76,124.62	\$ 93.90	\$ 104,980.20	\$ 28,855.58
21	4000	762	2%	\$ 82.07	\$ 62,537.34	\$ 111.90	\$ 85,267.80	\$ 22,730.46
22	5000	486	1%	\$ 96.05	\$ 46,680.30	\$ 129.90	\$ 63,131.40	\$ 16,451.10
23	10000	586	1%	\$ 165.95	\$ 97,246.70	\$ 219.90	\$ 128,861.40	\$ 31,614.70
24	20000	106	0%	\$ 305.75	\$ 32,409.50	\$ 399.90	\$ 42,389.40	\$ 9,979.90
25	30000	17	0%	\$ 445.55	\$ 7,574.35	\$ 579.90	\$ 9,858.30	\$ 2,283.95
26	40000	5	0%	\$ 585.35	\$ 2,926.75	\$ 759.90	\$ 3,799.50	\$ 872.75
27	50000	6	0%	\$ 725.15	\$ 4,350.90	\$ 939.90	\$ 5,639.40	\$ 1,288.50
28	60000	3	0%	\$ 864.95	\$ 2,594.85	\$ 1,119.90	\$ 3,359.70	\$ 764.85
29	70000	2	0%	#####	\$ 2,009.50	\$ 1,299.90	\$ 2,599.80	\$ 590.30
30	80000	3	0%	#####	\$ 3,433.65	\$ 1,479.90	\$ 4,439.70	\$ 1,006.05
31	90000	2	0%	#####	\$ 2,568.70	\$ 1,659.90	\$ 3,319.80	\$ 751.10
32	100000	8	0%	#####	\$ 11,393.20	\$ 1,839.90	\$ 14,719.20	\$ 3,326.00
33	TOTAL ANNUAL	48286	100%		\$ 3,616,515.88		\$ 6,295,153.30	\$ 2,678,637.42
34								

CUPA argues that this volumetric (or metered) wastewater rates is justifiable, but I contend that CUPA needs to implement their own metering system, not rely on water consumption meters for this to be applicable. Using water consumption meters to estimate wastewater volumes may only be applicable to apartment/ condos/ townhome type of communities but does not account for the customers that have large properties/ large outdoor usage (irrigation for lawn or gardens or evaporation in terms of heated swimming pools) of their water consumption. Accordingly, I contend that it is CUPA's failure to establish an effective cost-of-service plan for all of their customers. Where is the cost-of-service study that was required in the 2021 Base Rate Case Docket Nos. R-2021-3025206 and does that relate to customers with large outdoor space and outdoor water consumption?

DETAILED RESPONSE TO EACH OF CUPA's points for LEGAL INSUFFICIENCY (section III):

6. The Complaint fails as a matter of law, because even if all allegations within the Complaint are true, CUPA has not violated a Commission Order, regulation, or the Public Utility Code.

REBUTTAL: By law, Section 315(a) of the Code, 66 Pa. C.S. § 315(a) states that "the burden of proof to show that the rate involved is just and reasonable shall be upon the public utility". CUPA's argument is weak and alludes to admission of guilt.

7. The Commission has already decided CUPA's method of utilizing all water flows as reported by Aqua for metered wastewater rates is just and reasonable.

REBUTTAL: All the facts and data presented here shows that unless CUPA has its own infrastructure for measuring wastewater volumes (not water consumption volumes), this is a gross violation of cost-of-service principles. As contended, it significant impacts customers with large outdoor water consumption and the onus is on CUPA to address their 'method' to capture true cost-of-service principles. Additionally, there is a formal complaint process for a reason and one of the main objectives of this complaint is for the Commission to review and clarify the Settlement in lieu of the implemented rates and billing sent out since adoption by CUPA. As it stands, the annual revenue increased stands to be as much as \$2.6M and that in itself is not what the Commission approved in the Settlement.

8. CUPA filed its rate case notice with the information required by Commission regulations.

REBUTTAL: CUPA claimed that they filed its rate case notice by Commission regulations (52 Pa. Code § 53.45(b)) is false because CUPA has no way of measuring what a 'typical usage level' for wastewater is. CUPA has not shown or established what the correlation is between a consumer's water consumption and that consumer's water output into CUPA's wastewater collection infrastructure. Therefore, the notice that I received (see attachment B) was misleading because it implies that such referenced customer is using and outputting 3400 gallons of water into CUPA's infrastructure (what else could a wastewater bill be for?). A 'typical' customer (or household of same size) most probably outputs similar volume of water (typical usage) into CUPA's system. Therefore, why would this rate case notice below be interpreted any differently by the customer that has a swimming pool (or lawn sprinklers) and knows that any volume of water over 'typical usage level' is not going into CUPA's infrastructure?

In conclusion, CUPA Notice of Proposed Rate Change was misleading, inaccurate and did not follow Commission regulations (52 Pa. Code § 53.45(b)) because it does not state what a typical wastewater usage level or rate is for a customer that does not have a separate meter for wastewater.



[Notice of Proposed Rate Changes](#)

To Our Customers:

Community Utilities of Pennsylvania Inc. ("Company") is filing a request with the Pennsylvania Public Utility Commission ("PUC" or "Commission") to increase your water and wastewater rates as of January 9, 2024. This notice describes the Company's rate request, the PUC's role, and what actions you can take.

Community Utilities of Pennsylvania Inc. has requested an overall wastewater rate increase of \$1,720,070 per year. If the Company's entire wastewater request is approved, the total wastewater bill for a residential customer using 3,400 gallons would increase from \$74.73 to \$112.51 per month or by 50.55%. The total wastewater bill for a commercial customer using 3,104 gallons would increase from \$74.73 to \$107.20 per month or by 43.45%.

9. CUPA agreed to transition flat rate billing customers like Complainant to metered use by utilizing volumes from Aqua PA's water invoices as part of settlements

10. In its next base rate filing, CUPA will propose metered rates for customers in its Penn Estates wastewater system (made up of fixed and volumetric charges). For its Utilities Inc. of Pennsylvania wastewater system, within 30 days of a final Order in this proceeding, CUPA will reach out to the customers' water service provider to establish an ongoing arrangement to obtain monthly volumetric usage data and to obtain 24 months of data (which may include historic data). CUPA will advise the parties when such agreement is entered into. If the data is obtained by March 1, 2023 and in usable format, CUPA will propose metered rates (made up of fixed and volumetric charges) for its Utilities Inc. of Pennsylvania wastewater customers in its next base rate filing.

11. To facilitate this proposal, CUPA's filing will also include a cost of service study that assigns costs to customer classes based on flow requirements.

REBUTTAL: Even in the snippet captured by CUPA and its legal team (above), it states that CUPA 'will propose metered rates'. CUPA did not explicitly disclose to customers that they were switching from a flat rate to a metered rate, nor did they specify that they would be using metered rates from a third party (water service provider), see notice sent to customer attached below or snippet in point 8 above. As you can see the notice was very vague and misleading. It also required customers to read "Supplement No. 11 to Tariff Wastewater-Pa. P.U.C. No. 1 at Docket No. R-2023-3042805." Surely, a change as dramatic as this needed more clarification or higher visibility.

Diving deeper, even Supplement No. 11 to Tariff Wastewater-Pa. P.U.C. No. 1 at Docket No. R-2023-3042805 does not explicitly state that the wastewater 'metered' rates will be using water consumption metered rates, see below snippet from what was filed to PUC:

PART I: SCHEDULE OF RATES AND CHARGES

Section A - Rates for Metered Service

Metered rate of \$17.90 per thousand gallons or \$11.60 per thousand gallons for low-income customers. All wastewater customers are subject to base charges listed within Part I, Section B. (C)

Section B - Customer Charges

In addition to the metered rate, a monthly customer charge of \$51.65 applies to each customer account. (C)

Section C - Returned Check Charge

A charge of \$25 will be assessed any time where a check which has been presented to the Company for payment on account has been returned by the payor's bank for any reason.

Section D - Availability

\$22.70 per month per lot if located within Penn Estates and upon which no structure has been erected for an availability charge. This rate will continue to be billed quarterly. (D)

Section E - Tampering Fee

Unauthorized connections, repairs, or other tampering with the system will render the service subject to immediate discontinuation without notice and wastewater service shall not be restored until such unauthorized connections, repairs, and other tampering with the system have been removed and unless settlement is made in full and for wastewater service estimated by the Company to have been used by reason for such unauthorized connection. The fee for these unauthorized connections, repairs, and system tampering shall be \$200 plus any actual costs to repair.

Where does CUPA specify or defined in this filing that 'Metered Rate' will be based on volume of water consumption? By definition, it is implied that 'Metered Rate' for wastewater service = volume of wastewater that goes into CUPA Wastewater System and CUPA does not define otherwise in that Supplement No. 11.

Furthermore, the only reference to volumetric rates and water service in the entire filing is buried in a footnote : " CUPA will undertake commercially reasonable efforts to obtain the information that it needs to develop and bill volumetric rates for wastewater customers who do not receive water service from CUPA in the service territory formerly known as Utilities, Inc. of Pennsylvania"

Furthermore, did CUPA get the consent from each customer to collect their historic monthly volumetric usage data? Can the Water Service Provider give CUPA this data without permission from the customer?

Additionally, it seems like much of CUPA actions over the past 5 years have been from its Merger of Tamiment Service territory, which seems to be < 15% of CUPA's entire customer base and they were

using volumetric billing. To standardize everyone to volumetric billing required more clarity and explanation for the other 85% of CUPA's customer based (that was using a flat monthly billing method) than was sent out to us.

10. In the 2021 Base Rate Case, CUPA had initially proposed maintaining existing flat rates and transitioning all metered wastewater customers to flat rates, but the OCA objected to this proposal

REBUTTAL: OCA's argument is based on 'cost-of-service principles' and CUPA failed to address that in its current new implement volumetric billing as captured in this entire complaint. Furthermore, OCA cited 'moving utilities toward metered rates'. However, if the utility being provided is wastewater service, the onus is on CUPA to establish how to accurately capture metered rates for wastewater. CUPA has not established a correlation between water consumption and volume that goes into CUPA Wastewater System, especially for customers with large outdoor usage (i.e., separate outdoor usage from customer's water consumption meter). Lastly, it seems like the OCA asked for a cost-of-service study. While I cannot find a document with the findings of this study, it is evident that CUPA has not done its due diligence before implementing or proposing these new volumetric rates based on water consumption if such massive discrepancies exist today for customers that have large outdoor water consumption usage. Again, the onus is on CUPA to accurately capture cost-of-service and not overbill customers for service not provided.

11. The OCA described the benefits of moving away from flat rates, including encouraging conservation of both water and wastewater resources:

REBUTTAL: I completely agree with conservation of both water and wastewater resources but CUPA needs to determine how to accurately measure wastewater volume. The broad assumption that water in = water into CUPA Wastewater System is blatantly wrong as not all water goes into CUPA Wastewater System and CUPA cannot erroneously bill customers for service not provided. Customers with large outdoor water usage is already paying (correctly) for those services via their Water Provider meter. Such customers should not be paying double or taking on the majority of the equitable billing (see 12).

12. The Commission found metered wastewater rates are in the public interest:

12. The Commission found metered wastewater rates are in the public interest:

We concur with the Joint Petitioners that there is no question that volumetric billing is preferable to flat rate billing, as it provides better price signals and promotes conservation. In addition to encouraging the conservation of water and wastewater services, volumetric billing also results in a more equitable distribution of the variable costs of wastewater service among ratepayers.

2021 Base Rate Case at 68-70.

REBUTTAL: This statement is only true if utility providers have an accurate way of measuring the true volume that goes into the Wastewater System. I am completely onboard with equitable billing if it can be precisely determined what volume each customer puts into the Wastewater System. So, the household that only puts 1000 gallons of wastewater per month into the system should absolutely pay less than the household that puts 2000 or 3000 gallons of wastewater per month into the system. However, for Utility Providers like CUPA to assume that all water consumption = volume of water that goes into the Wastewater System is grossly false, especially for consumer with large properties or those consumers that have large outdoor usage (whether it be lawn, gardens, vegetable garden, heated swimming pools or just kids playing in the summer). Again, the onus is on CUPA to provide a fair, just and reasonable method based on volumetric usage that takes outdoor usage into consideration and only bill according to cost-of-service principles.

13. The 2023 Base Rate Case likewise resulted in a Commission-approved Settlement with I&E, OCA, and OSBA.....Thus, the Commission approved that customers using higher volumes would face significant rate increases because Commission expressly approved these rates as just and reasonable.

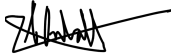
REBUTTAL: As shown previously, the current rates do not amount to \$1.4M annual revenue increase but closer to \$2.6M annual revenue increase. Additionally, I would like the Commission to specifically clarify ‘customer using higher volumes’ because it should apply to Wastewater Volume. As argued repeated, not all of water consumption volume goes into Wastewater System and those customers are already paying Water Providers for that higher volume of water consumed. I do not believe that the Commission accurately assessed how much water goes into irrigation or evaporation (heated pools) and those customer should not be paying both Water Provider and CUPA for that portion. Nevertheless, Cost-of-Service Principles also applies here and the onus is on CUPA to determine how to accurately measure Wastewater Volume.

14. REBUTTAL: Deduct volumes or deduct meters could be a solution for CUPA but the onus is on CUPA since they are the ones implementing this new method to come up with a solution that still sticks to Cost-of-Service Principles. In the referenced case, Aqua Pennsylvania Wastewater Inc., provides both water and wastewater service to some of its customers. Onus is on CUPA to also figure out a solution for its customers that use third-party water providers (like Aqua in my case for example).
15. REBUTTAL: Clarity is needed on what is the ‘Commission-approved tariff’ since it has been shown that the current CUPA rates do not amount to \$1.4M annual revenue increase but closer to \$2.6M annual increase. Additionally, the rates must still stick to Cost-of-Service Principles and the PUC system or process should allow for correction.
16. REBUTTAL: If Deduct Meters is a solution that will allow CUPA to stick to Cost-of-Service Principles, then the onus is on CUPA to remedy the situation and not still charge for services not render.
17. REBUTTAL: As already explained, I do not have an outstanding balance because CUPA served me with a notice of discontinuation on Nov 20, 2024, plus CUPA started to tack on late payment fees. I have paid CUPA’s erroneous bills since August 2024 new rate implementation but fully expect full compensation/ fair settlement of amount paid to CUPA/ what CUPA overcharged for

services not rendered and adjustment of rates going forward for myself and all CUPA customers affected by this erroneous rate increase.

In conclusion, I hope that my above arguments have shown that CUPA new implemented rates and methodology not only goes against Cost-of-Service Principles but is unreasonable and unjustifiable. Moreso, even CUPA's own data show that they are estimated to get closer to \$2.6M annual increase in revenue, which is much more than the \$1.4M that was publicly announced.

Sincerely yours,

A handwritten signature in black ink, appearing to read 'Mahendra C. Orilall', with a long horizontal line extending to the right.

Mahendra C. Orilall

cc Whitney E. Snyder via email (wesnyder@hmslegal.com)

ATTACHMENT A



PO BOX 160609
Altamonte Springs, FL 32716

November 20, 2024

MAHENDRA ORILALL
1216 JACKSON DR
DOWNTOWN, PA 19335

Account Number: 9660947514

Dear MAHENDRA ORILALL:

Our records indicate that there is an outstanding balance of \$108.30 on your water and/or wastewater account. If you have already mailed your payment, we apologize for any inconvenience and thank you for your payment.

If your payment has not been mailed, please send in the full outstanding balance today. If we do not receive payment of past due charges, services can be disconnected for non-payment on or after 12/06/2024 without additional notification. For your service to be reinstated, the outstanding balance and all applicable fees must be paid in full.

For your convenience, charge/debit card or electronic check payments may be made through <https://myutility.us/> or by calling (800) 638-0262. There is a convenience fee for this service. You may also visit our website at www.uiwater.com/pennsylvania for more information. Returned payments will be subject to the maximum fees allowed by your state.

We thank you for your prompt attention to this matter.

Collections Department
Community Utilities of PA-Utilities Inc of PA

REG DISCON

Community Utilities of PA-Utilities Inc of PA

445

PO BOX 160609 Altamonte Springs FL 32716 P:(800) 638-0262 www.uiwater.com/pennsylvania

966094751400000108308



PO BOX 160609
Altamonte Springs, FL 32716

Account Number: 9660947514
Please Pay: **\$108.30**

Amount Paid

UTL1121A 67 1 MB 0.622
7000000118 00.0002.0064 67/1



MAHENDRA ORILALL
1216 JACKSON DR
DOWNTOWN PA 19335-3801



COMMUNITY UTILITIES OF PA
PO BOX 70840
CHARLOTTE, NC 28272-0840

ATTACHMENT B



**Community
Utilities**TM
of Pennsylvania

Notice of Proposed Rate Changes

To Our Customers:

Community Utilities of Pennsylvania Inc. (“Company”) is filing a request with the Pennsylvania Public Utility Commission (“PUC” or “Commission”) to increase your water and wastewater rates as of January 9, 2024. This notice describes the Company's rate request, the PUC's role, and what actions you can take.

Community Utilities of Pennsylvania Inc. has requested an overall wastewater rate increase of \$1,720,070 per year. If the Company's entire wastewater request is approved, the total wastewater bill for a residential customer using 3,400 gallons would increase from \$74.73 to \$112.51 per month or by 50.55%. The total wastewater bill for a commercial customer using 3,104 gallons would increase from \$74.73 to \$107.20 per month or by 43.45%.

To find out your customer class or how the requested increase may affect your water or wastewater bill, contact Community Utilities of Pennsylvania at (800) 638-0262. The rates requested by the company may be found in Supplement No. 11 to Tariff Wastewater-Pa. P.U.C. No. 1 at Docket No. R-2023-3042805. You may examine the material filed with the PUC which explains the requested increase and the reasons for it. A copy of this material is kept at the following offices:

Community Utilities of Pennsylvania Inc.
1201 Sawmill Road
Downingtown, PA 19335

The state agency which approves rates for public utilities is the PUC. The PUC will examine the requested rate increase and can prevent existing rates from changing until it investigates and/or holds hearings on the request. The company must prove that the requested rates are reasonable. After examining the evidence, the PUC may grant all, some, or none of the request or may reduce existing rates.

The PUC may change the amount of the rate increase requested by the utility for each customer class. As a result, the rate charged to you may be different than the rate requested by the company and shown above.

There are three ways to challenge a company's request to change its rates:

1. You can file a formal complaint. If you want a hearing before a judge, you must file a formal complaint. By filing a formal complaint, you assure yourself the opportunity to take part in hearings about the rate increase request. All complaints should be filed with the PUC before January 9, 2024. If no formal complaints are filed, the Commission may grant all, some or none of the request without holding a hearing before a judge.
2. You can send us a letter telling why you object to the requested rate increase. Sometimes there is information in these letters that makes us aware of problems with the company's service or management. This information can be helpful when we investigate the rate request. Send your letter or request for a formal complaint form to the Pennsylvania Public Utility Commission, Post Office Box 3265, Harrisburg, PA 17105-3265.

3. You can be a witness at a public input hearing. Public input hearings are held if the Commission opens an investigation of the company's rate increase request and if there is a large number of customers interested in the case. At these hearings you have the opportunity to present your views in person to the PUC judge hearing the case and the company representatives. All testimony given "under oath" becomes part of the official rate case record. These hearings are held in the service area of the company.

For more information, call the PUC at 1-800-692-7380. You may leave your name and address so you can be notified of any public input hearings that may be scheduled in this case.

Rates approved by the PUC and full tariff can be located on our website: <https://www.myutility.us/pennsylvania/regulatory>

Community Utilities of Pennsylvania Inc.'s Commitment

Community Utilities of Pennsylvania Inc. has continued to make investments to improve and maintain the quality and reliability of our service. The proposed increase is needed to recover the costs of these improvements and to reflect the increased costs of providing quality service. Together we share the goal of a safe, dependable supply of potable water and environmentally sustainable wastewater treatment consistent with prudent business practices. We understand that there is never a good time for a rate increase. The rates we have requested are based on the actual costs of providing wastewater service. As a public utility, we have an obligation to continue to provide adequate, efficient, safe, and reasonable service and facilities at just and reasonable rates. We welcome any feedback from our customers, whether it is about our proposed rates or about our services. Please contact Community Utilities of Pennsylvania Inc. at (800) 638-0262.

Pennsylvania Sponsored Programs

The following Pennsylvania sponsored programs also provide bill assistance for eligible programs.

- Pennsylvania Emergency Rental Assist Program (ERAP) - <https://www.dhs.pa.gov/ERAP/Pages/ERAP.aspx>
- Pennsylvania Homeowner Assistance Fund Pennsylvania - <https://pahaf.org>