



COMMONWEALTH OF PENNSYLVANIA

June 18, 2025

**E-FILED**

Matthew L. Homsher, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street  
Harrisburg, PA 17120

**Re: Pennsylvania Public Utility Commission v. The York Water Company / Docket Nos. R-2025-3053442 (Water) / R-2025-3053573 (Wastewater)**

Dear Secretary Homsher:

Enclosed please find the Notice of Complaint, Public Statement, and Verification, on behalf of the Office of Small Business Advocate (“OSBA”), in the above-referenced proceedings.

Copies will be served on all known parties in these proceedings, as indicated on the attached Certificate of Service.

If you have any questions, please do not hesitate to contact me.

Sincerely,

*/s/ Steven C. Gray*

Steven C. Gray  
Senior Attorney  
Assistant Small Business Advocate  
Attorney ID No. 77538

*Enclosures*

cc: Jason Hails  
Roger Cathcart  
Parties of Record

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

<b>Pennsylvania Public Utility Commission</b>	:	<b>Docket Nos. R-2025-3053442 (Water)</b>
	:	<b>R-2025-3053573 (Wastewater)</b>
<b>v.</b>	:	
	:	
<b>The York Water Company</b>	:	

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**COMPLAINT OF THE  
OFFICE OF SMALL BUSINESS ADVOCATE**

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1. The Complainant is:

NazAarah Sabree  
Forum Place  
555 Walnut Street, 1st Floor  
Harrisburg, PA 17101

2. The name and address of the Complainant's attorneys are:

Steven C. Gray, Esq.  
Senior Attorney  
Assistant Small Business Advocate  
Office of Small Business Advocate  
Forum Place  
555 Walnut Street, 1st Floor  
Harrisburg, PA 17101  
[sgray@pa.gov](mailto:sgray@pa.gov)

Rebecca Lyttle, Esq.  
Assistant Small Business Advocate  
Office of Small Business Advocate  
Forum Place  
555 Walnut Street, 1st Floor  
Harrisburg, PA 17101  
[relyttle@pa.gov](mailto:relyttle@pa.gov)

3. The respondent utility is:

The York Water Company  
130 East Market Street  
York, PA 17401-1219

4. The Complainant is authorized and directed by the Small Business Advocate Act, Act 181 of 1988, 73 P.S. §§ 399.41 - 399.50, to represent the interests of small business consumers of utility services in matters before the Pennsylvania Public Utility Commission (“Commission”).

5. On May 30, 2025, the York Water Company and the York Water Company – Wastewater Division (“York” or the “Company”) filed Supplement No. 165 to Tariff Water-Pa. P.U.C. No. 14 (“Supplement No. 165”) and Supplement No. 26 to Tariff Wastewater-Pa. P.U.C. No. 1 (“Supplemental No. 26”) with the Pennsylvania Public Utility Commission (“Commission”).

6. If approved by the Commission, proposed Supplement No. 165 would increase York’s annual water revenues by \$20,311,978, or by 28.9%.

7. If approved by the Commission, proposed Supplement No. 26 would increase York’s annual wastewater revenues of \$3,857,507, or by 44.5%.

8. After preliminary review of the materials filed by the Company in support of the Supplement No. 165 and Supplement No. 26, Complainant believes, and therefore avers, that those materials may be insufficient to justify the rate increase requested and that the York’s present and proposed rates, rules, and conditions of service may be unjust, unreasonable, unduly discriminatory, and otherwise contrary to law, particularly as they pertain to the Company’s small business customers.

9. Complainant believes, and therefore avers, that York’s proposed tariff changes, proposed rates, rate design, and revenue allocation are or may be unjust, unreasonable, and unlawfully discriminatory in violation of, *inter alia*, Sections 1301 and 1304 of the Public Utility Code, 66 Pa. C.S. §§1301 and 1304, and, furthermore, are contrary to appropriate public policy, sound ratemaking considerations, and may not be supported by the materials filed by York.

10. The OSBA also files this Complaint to ensure that the Company will provide a formal payment assistance plan for its small business customers.

11. In view of the foregoing, the Small Business Advocate respectfully requests that the Pennsylvania Public Utility Commission:

- A. Suspend and investigate the operation of Supplement No. 165 and Supplement No. 26;
- B. At the conclusion of such investigation, reject the proposed new rates and other tariff changes in Supplement No. 165 and Supplement No. 26 to the extent required to make certain that York's rates are lawful, just, reasonable, and not unduly discriminatory to small business customers; and
- C. Grant such other relief as may be necessary or appropriate.

Respectfully submitted,

*/s/ Steven C. Gray*

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Steven C. Gray  
Senior Attorney  
Assistant Small Business Advocate  
Attorney ID No. 77538

Commonwealth of Pennsylvania  
Office of Small Business Advocate  
Forum Place  
555 Walnut Street, 1<sup>st</sup> Floor  
Harrisburg, PA 17101

Dated: June 18, 2025

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

<b>Pennsylvania Public Utility Commission</b>	:	<b>Docket Nos. R-2025-3053442 (Water)</b>
	:	<b>R-2025-3053573 (Wastewater)</b>
<b>v.</b>	:	
	:	
<b>The York Water Company</b>	:	

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**PUBLIC STATEMENT OF  
THE OFFICE OF SMALL BUSINESS ADVOCATE**

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The Small Business Advocate is authorized and directed to represent the interest of small business consumers of utility services in Pennsylvania under the provisions of the Small Business Advocate Act, Act 181 of 1988, 73 P.S. §§ 399.41 - 399.50 (“Act”). The Act further provides that the Small Business Advocate is to issue publicly a written statement stating concisely the specific interest of small business consumers to be protected by her initiation of or intervention in any proceeding involving those interests before the Public Utility Commission (“Commission”) or any other agency or court. This public statement relates to the filing today by the Small Business Advocate of a complaint against the proposed base rate tariff filings of The York Water Company (“York” or the “Company”), which would increase the annual water revenue of York by \$20,311,978, and which would increase the annual wastewater revenue of York by \$3,857,507.

The Small Business Advocate files this formal complaint against York’s proposed base rate tariff filings to protect the interests of the Company’s small business customers. A thorough inquiry by the Commission into all elements of the York’s proposed tariff filings is necessary to

ensure that the tariff filings are lawful, just, reasonable, and not discriminatory against the Company's small business customers.

In view of the foregoing, the Small Business Advocate will participate in proceedings before the Public Utility Commission to investigate the reasonableness of the proposed base rate tariff filing. The Small Business Advocate will ask the Commission to deny any proposed new rates and other tariff changes that apply to small business customers that are not proven by York to be lawful, just, reasonable, and not discriminatory against the Company's small business customers.

Dated: June 18, 2025

**VERIFICATION**

I, NazAarah Sabree, hereby state that the facts set forth herein above are true and correct to the best of my knowledge, information and belief and that I expect to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa. C.S. § 4904 (relating to unsworn falsification to authorities).

Date: June 18, 2025

  
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(Signature)

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

<b>Pennsylvania Public Utility Commission</b>	:	<b>Docket Nos. R-2025-3053442 (Water)</b>
	:	<b>R-2025-3053573 (Wastewater)</b>
<b>v.</b>	:	
	:	
<b>The York Water Company</b>	:	

**CERTIFICATE OF SERVICE**

I hereby certify that true and correct copies of the foregoing have been served via email (*unless otherwise noted below*) upon the following persons, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

The Honorable Charles E. Rainey, Jr.  
Chief Administrative Law Judge  
Pennsylvania Public Utility Commission  
400 North Street  
Commonwealth Keystone Building  
Harrisburg, PA 17120  
[crainey@pa.gov](mailto:crainey@pa.gov)

Jacob D. Guthrie, Esquire  
Katherine Kennedy, Esquire  
Ryan Morden, Esquire  
Consumer Advocate  
PA Office of Consumer Advocate  
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400 North Street  
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Date: June 18, 2025

*/s/ Steven C. Gray*  
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Steven C. Gray  
Senior Attorney  
Assistant Small Business Advocate  
Attorney I.D. No. 77538