



COMMONWEALTH OF PENNSYLVANIA

June 24, 2025

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JUN 24 2025 PM 3:13

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

Re: Pennsylvania Public Utility Commission v. The Pittsburgh Water and Sewer Authority (Stormwater)/ Docket No. R-2025-3055012

Dear Secretary Homsher:

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

Copies will be served on all known parties in this proceeding, 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: Joe Kubas
Parties of Record

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission	:	Docket No. R-2025-3055012
	:	
v.	:	
	:	
The Pittsburgh Water and Sewer Authority (Stormwater)	:	
	:	

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

1. The Complainant is:

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

2. The name and address of the attorneys for the Office of Small Business Advocate (“OSBA”) 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

Rebecca Lyttle, Esq.
Assistant Small Business Advocate
Office of Small Business Advocate
Forum Place
555 Walnut Street, 1st Floor
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relyttle@pa.gov

3. The respondent utility is:

The Pittsburgh Water and Sewer Authority
1200 Penn Avenue
Pittsburgh, PA 15222

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. This Complaint is filed against the rates, terms, and other provisions of the Tariff Filings and Rate Requests which were filed with the Commission on June 4, 2025, by the Pittsburgh Water and Sewer Authority (“PWSA” or the “Authority”). In the June 4th filings, the Authority is requesting a multi-year overall rate increase of \$84.4 million, inclusive of an increase in the Distribution System Improvement Charge (“DSIC”) cap to 7.5% and expansion of the PENNVEST charge.

6. After preliminary review of the materials filed by the Authority in support of the proposed Tariffs, Complainant believes, and therefore avers, that those materials may be insufficient to justify the rate increase requested and that the Authority’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 small business customers.

7. Complainant believes, and therefore avers, that PWSA’s proposed tariff changes and 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 contrary to appropriate public policy and sound ratemaking considerations, and may not be supported by the materials filed by PWSA.

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

- A. Suspend and investigate the operation of June 4th Tariff Filings and Rate Requests;
- B. At the conclusion of such investigation, reject the proposed new rates and other tariff changes in the June 4th Tariff Filings and Rate Requests to the extent required to make certain that PWSA'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 Gray

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

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

Dated: June 24, 2025

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission	:	Docket No. R-2025-3055012
	:	
v.	:	
	:	
The Pittsburgh Water and Sewer Authority (Stormwater)	:	
	:	

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

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 (the “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 or any other agency or court. This public statement relates to the filing today by the Small Business Advocate of a Complaint in response to the Tariff Filings and Rate Requests of the Pittsburgh Water and Sewer Authority (“PWSA” or the “Authority”) that were filed with the Pennsylvania Public Utility Commission (“Commission”) on June 4, 2025.

In the June 4th filings, the Authority is requesting a multi-year overall rate increase of \$84.4 million, inclusive of an increase in the Distribution System Improvement Charge (“DSIC”) cap to 7.5% and expansion of the PENNVEST charge.

The Small Business Advocate will participate in proceedings before the Commission to investigate the reasonableness of the proposals set forth in PWSA’s June 4th Filings. The Small

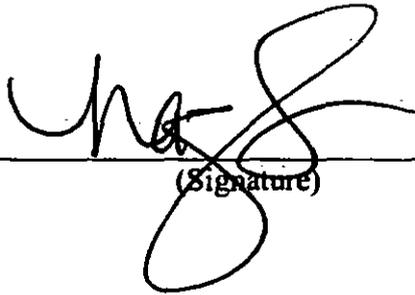
Business Advocate will ask the Commission to deny any aspect of the Authority's June 4th Filings that are not proven to be lawful, just, reasonable, and non-discriminatory.

Dated: June 24, 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 24, 2025



(Signature)

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PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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Authority (Stormwater) :

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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
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Date: June 24, 2025

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