



COMMONWEALTH OF PENNSYLVANIA

June 24, 2025

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JUN 24 2025 PM 3:05

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 d/b/a Pittsburgh Water / Docket Nos. (P-2025-3055587) (Water) / P-2025-3055588 (Wastewater) / P-2025-3055589 (Stormwater)**

Dear Secretary Homsher:

Enclosed please find the Notice of Intervention, 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: Joe Kubas  
Parties of Record

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

<b>Pennsylvania Public Utility Commission</b>	:	<b>Docket Nos. P-2025-3055587 (Water)</b>
	:	<b>P-2025-3055588 (Wastewater)</b>
<b>v.</b>	:	<b>P-2025-3055589 (Stormwater)</b>
	:	
<b>The Pittsburgh Water and Sewer Authority d/b/a Pittsburgh Water</b>	:	
	:	

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**NOTICE OF INTERVENTION  
OF THE OFFICE OF SMALL BUSINESS ADVOCATE**

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The Office of Small Business Advocate (“OSBA”) files this Notice of Intervention with respect to the Petition of Pittsburgh Water and Sewer Authority d/b/a Pittsburgh Water’s Petition for Waiver of Statutory Definition of Fully Projected Future Test Year that was filed with the Pennsylvania Public Utility Commission (“Commission”) on June 4, 2025. In support of this Notice of Intervention, the OSBA avers as follows:

1. The OSBA is an agency of the Commonwealth of Pennsylvania authorized by the Small Business Advocate Act (Act 181 of 1988, 73 P.S. §§ 399.41 - 399.50) to represent the interest of small business consumers as a party in proceedings before the Commission.

**RECEIVED**

JUN 24 2025

PA PUBLIC UTILITY COMMISSION  
SECRETARY’S BUREAU

2. Representing the OSBA in this proceeding is:

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

Respectfully submitted,

*/s/ Steven C. Gray*

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

For:  
NazAarah Sabree  
Small Business Advocate

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

Date: June 24, 2025

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

<b>Pennsylvania Public Utility Commission</b>	:	<b>Docket Nos. P-2025-3055587 (Water)</b>
	:	<b>P-2025-3055588 (Wastewater)</b>
<b>v.</b>	:	<b>P-2025-3055589 (Stormwater)</b>
	:	
<b>The Pittsburgh Water and Sewer Authority d/b/a Pittsburgh Water</b>	:	

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JUN 24 2025

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

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PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

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 Notice of Intervention ("NOI") in the Petition of the Pittsburgh Water and Sewer Authority d/b/a Pittsburgh Water's Petition for Waiver of Statutory Definition of Fully Projected Future Test Year that was filed with the Pennsylvania Public Utility Commission ("Commission") on June 4, 2025.

The Small Business Advocate files this NOI to protect the interests of Pittsburgh Water and Sewer Authority d/b/a Pittsburgh Water's small business customers that could be affected by the program set forth in the Petition.

The Small Business Advocate will participate in proceedings before the Public Utility Commission to investigate the reasonableness of proposals set forth in the Petition. The Small

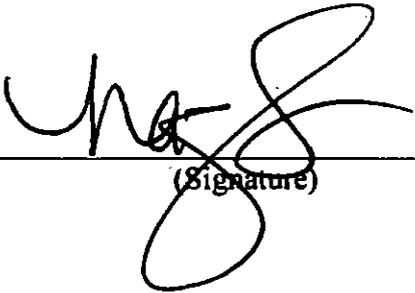
Business Advocate will ask the Commission to deny any aspect of the Petition that is not proven to be lawful, just, reasonable, and non-discriminatory.

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

  
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(Signature)

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**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**Petition of the Pittsburgh Water And Sewer Authority d/b/a/ Pittsburgh Water to Increase its Water and Wastewater Distribution System Improvement (“DSIC”) Caps to 7.5%** : **Docket Nos. P-2025-3055650 (Water)**  
: **P-2025-3055652 (Wastewater)**  
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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  
Pennsylvania Public Utility Commission  
400 North Street  
Commonwealth Keystone Building  
Harrisburg, PA 17120  
[crainey@pa.gov](mailto:crainey@pa.gov)

Darryl Lawrence, Esquire  
Consumer Advocate  
PA Office of Consumer Advocate  
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Harrisburg, PA 17101-1923  
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Allison Kaster, Esquire  
Director  
Bureau of Investigation & Enforcement  
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Lauren Burge, Esquire  
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[lburge@eckertseamans.com](mailto:lburge@eckertseamans.com)

Date: June 24, 2025

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