



COMMONWEALTH OF PENNSYLVANIA

July 11, 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 Pittsburgh Water and Sewer Authority d/b/a Pittsburgh Water / Docket Nos. R-2025-3055010 (Water) / R-2025-3055011 (Wastewater) / R-2025-3055012 (Stormwater)

Dear Secretary Homsher:

Enclosed for filing please find the Prehearing Memorandum, 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**

Pennsylvania Public Utility Commission	:	Docket Nos. R-2025-3055010 (Water)
	:	R-2025-3055011 (Wastewater)
	:	R-2025-3055012 (Stormwater)
v.	:	
	:	
The Pittsburgh Water and Sewer Authority d/b/a Pittsburgh Water	:	
	:	

**PREHEARING MEMORANDUM
OF THE OFFICE OF SMALL BUSINESS ADVOCATE**

I. INTRODUCTION

The Office of Small Business Advocate (“OSBA”) is authorized to represent the interests of small business customers of utility services before the Pennsylvania Public Utility Commission (“Commission”) pursuant to the provisions of the Small Business Advocate Act, Act 181 of 1988, 73 P.S. §§ 399.41 – 399.50 (“the Act”). In order to discharge this statutory duty, the Small Business Advocate deems it necessary to participate as a party to these proceedings. Representing the OSBA in the above-captioned matters are Assistant Small Business Advocates Steven Gray and Rebecca Lyttle. Please address all correspondence in this matter as follows:

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Senior Attorney
Assistant Small Business Advocate
Office of Small Business Advocate
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Rebecca Lyttle, Esq.
Assistant Small Business Advocate
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II. FILING BACKGROUND

On June 4, 2025, Pittsburgh Water and Sewer Authority (“PWSA” or the “Authority”) filed Tariff Filings and Rate Requests with the Commission. 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 OSBA filed complaints in response to the June 4th Filings on June 24, 2025.

Also on June 4, 2025, PWSA filed a Petition for Waiver of the Statutory Definition of Fully Protected Future Test Year.

The OSBA filed a notice of intervention in response to this FPFTY filing on June 24, 2025.

Finally, on June 4, 2025, PWSA filed a Petition for Authorization to Increase Water and Wastewater DSIC Charge Caps to 7.5%.

The OSBA filed a notice of intervention in response to this DSIC filing on June 24, 2025.

III. IDENTIFICATION OF WITNESS AND TENTATIVE ISSUES

Assisting in the development and presentation of the OSBA’s case in these proceedings will be:

Joseph Kubas
Commonwealth of Pennsylvania
Office of Small Business Advocate
Forum Place
555 Walnut Street, 1st Floor
Harrisburg, PA 17101
jkubas@pa.gov

The OSBA will participate in these proceedings to ensure that the interests of small business customers are adequately represented and protected.

After an initial review of the materials submitted by PWSA, the OSBA has identified the following list of issues that it will evaluate in these proceedings:

Water, Wastewater, and Stormwater Systems

- Plant: Construction budget

- Revenue: Present rate revenue
Number of customers
Volumes billed
Wholesale volumes and rates
Miscellaneous revenue
Grants received
Proposed multi-year rate plan

- Expenses: Chemical expense
Bad debt expense
Pump and motor expense
Contract expense
Plant repair expense
Line locating expense
Inventory hardware expense
Water lien expense
SCADA expense
City cost expense
Water, wastewater, and sewer contract expense

- Cost Of Service and Rate Structure:
- Allocation factors and assumption.
 - Allocation of cost to the various classes
 - Monthly charges
 - Customer charges
 - Proposed rates
 - Removal of allowance
 - Gradualism adjustment
 - Low-income rates and recovery
 - PennVEST
 - Distribution System Improvement Charge increase
 - ALCOSA billing

The OSBA reserves the right to pursue additional issues that may arise throughout these proceedings.

IV. SERVICE OF DOCUMENTS

In accordance with 52 Pa. Code § 1.54(b)(3)(i), the OSBA agrees to accept electronic mail delivery of documents on the due date¹ as satisfying the in-hand requirement.

The OSBA requests that email delivery of documents also be provided to its witnesses identified above.

In addition to email copies of pleadings, briefs, and exceptions, the OSBA requests email copies of responses to discovery propounded by the OSBA or any other party.

V. DISCOVERY

The OSBA does not propose any discovery modifications.

VI. SETTLEMENT

The OSBA notes its willingness to enter settlement discussions at the appropriate phase of these proceedings.

VII. HEARING AND BRIEFING SCHEDULE

At the time of this writing, the parties are discussing a proposed procedural schedule.

¹ In accordance with 52 Pa. Code § 1.56(a)(5), documents must be received by 4:30 pm.

VIII. CONSOLIDATION

The OSBA does not object to procedurally consolidating PWSA's FPPTY and DSIC Petitions with the water, wastewater, and stormwater rate cases.

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: July 11, 2025

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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	:	R-2025-3055012 (Stormwater)
v.	:	
	:	
The Pittsburgh Water and Sewer Authority d/b/a Pittsburgh Water	:	
	:	

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 Emily DeVoe
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The Honorable Ann Quimby
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Date: July 11, 2025

/s/ Steven C. Gray _____
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