



July 11, 2025

VIA E-MAIL

Administrative Law Judge Emily DeVoe
Administrative Law Judge Ann Quimby
Pa. Public Utility Commission
400 North Street
Harrisburg, PA 17120
edevoe@pa.gov
aquimby@pa.gov

Re: Pa. PUC v. Pittsburgh Water and Sewer Authority,

**Docket Nos. R-2025-3055010 (Water); R-2025-3055011 (Wastewater);
R-2025-3055012 (Stormwater)**

Prehearing Conference Memorandum of Pittsburgh United Our Water Table

Your Honors,

Please find the **Prehearing Conference Memorandum of Pittsburgh United Our Water Table** in the above-captioned proceeding.

As indicated on the attached Certificate of Service, service on the parties was accomplished by email only.

Respectfully,

A handwritten signature in black ink, appearing to read "Ria M. Pereira".

Ria M. Pereira, Esq.
Counsel for Pittsburgh United Our Water Table

CC: *Certificate of Service*
Secretary Matthew Homsher (via e-file only)

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

Pennsylvania Public Utility Commission	:	
	:	Docket No R-2025-3055010
v.	:	R-2025-3055011
	:	R-2025-3055012
Pittsburgh Water and Sewer Authority	:	
d/b/a Pittsburgh Water	:	

**PREHEARING CONFERENCE MEMORANDUM
OF PITTSBURGH UNITED OUR WATER TABLE**

PENNSYLVANIA UTILITY LAW PROJECT
Counsel for Pittsburgh United's Our Water Table
Ria M. Pereira, Esq., PA ID: 316771
John W. Sweet, Esq., PA ID: 320182
Lauren N. Berman, Esq., PA ID: 310116
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On July 10, 2025, a Prehearing Conference Order was issued by Administrative Law Judge (ALJ) Emily I. DeVoe and ALJ Ann Quimby setting a telephonic prehearing conference for Monday, July 14, 2025 at 11:00 AM, and requiring parties to file a Prehearing Memorandum no later than noon on Friday, July 11, 2025. In accordance with that Order, Pittsburgh United Our Water Table (hereinafter, Pittsburgh United OWT or OWT), through its counsel at the Pennsylvania Utility Law Project, hereby files this Prehearing Conference Memorandum.

I. Background

On June 4, 2025, Pittsburgh Water and Sewer Authority (herein Pittsburgh Water) submitted a rate filing, Tariff Water - PA. P.U.C.– Pa. No. 1 Supp. No. 16.¹ In the filing, Pittsburgh Water is seeking a multi-year rate increase of \$84.4 million, including a 25.9% increase (\$63.7 million) in FY 2026, and an additional 6.7% increase (\$20.7 million) in FY 2027. Included in this increase is a proposed 7.5% increase in and expansion of the Distribution System Improvement Charge (DSIC). Pittsburgh Water is also proposing to remove the minimum water and wastewater charge effective January 1, 2027, and to expand the PENNVEST Surcharge starting in FY 2026.

On June 25, 2025, Pittsburgh United OWT filed a Petition to Intervene and Answer, requesting full intervenor status as an active party to the proceeding.

II. Service on Pittsburgh United OWT

Pittsburgh United OWT is represented by the attorneys at the Pennsylvania Utility Law Project. Pittsburgh United OWT requests consolidated service as follows:

Ria M. Pereira, Esq.
John W. Sweet, Esq.
Lauren N. Berman, Esq.
PENNSYLVANIA UTILITY LAW PROJECT
118 Locust Street

¹ Pittsburgh Water St. 1 at 3-4.

Harrisburg, PA 17102
Telephone: 717-236-9486
Facsimile: 717-233-4088
E-mail: PULP@pautilitylawproject.org

Pittsburgh United OWT requests that parties agree to electronic service in this proceeding.

III. Representation of Pittsburgh United OWT at Prehearing Conference

Pittsburgh United OWT will be represented by Ria Pereira, Esq. at the Prehearing Conference.

IV. Issues to be Presented

Continued delivery of safe, affordable water and wastewater services is of critical importance to the safety, welfare, and economic stability of all Pennsylvanians – particularly those with limited financial means. In the event the Commission approves any water, wastewater, or stormwater distribution rate increase or fee, it should condition approval on Pittsburgh Water’s agreement to perform such actions as are necessary to ensure service remains universally accessible to those who reside in Pittsburgh Water’s service territory and in compliance with all applicable sections of the Public Utility Code, Commission regulations and policy, and prior settlement agreements.

Pittsburgh United OWT has conducted an initial review of Pittsburgh Water’s proposed tariff changes and testimony, and opposes Pittsburgh Water’s requests on the grounds that the proposed rate increases and tariff changes may result in unjust and unreasonable rates that would impose severe financial hardship on low and moderate income residential customers. Pittsburgh United OWT identifies the following specific issues of concern, which it intends to address in this proceeding, though it reserves the right to raise additional issues which may arise through the course of this proceeding, and the list below is not exhaustive of the issues that Pittsburgh United OWT may raise after more thorough investigation of the issues and review of discovery:

- i. The conformity to law and the effect of Pittsburgh Water’s rate filing and proposed rate increase on low income households.
- ii. The effect of Pittsburgh Water’s rate filing and proposed rate increase on low income households enrolled in or eligible for Pittsburgh Water’s low income programs, and adequacy of those programs in delivering universally accessible services.
- iii. The effect of Pittsburgh Water’s proposal to eliminate its minimum water and wastewater charge on Pittsburgh Water’s residential customers, including Pittsburgh Water’s low income customers.
- iv. Whether Pittsburgh Water’s proposed changes to its low income programs, including its Bill Discount Program (BDP), are adequate to remediate the effect of the proposed rate increase and modification on low income customers.
- v. Pittsburgh United OWT also plans to investigate the impact of the other proposals made by Pittsburgh Water in this proceeding, including its proposal to eliminate the ability of customers to pay with credit and debit cards without payment of a fee, its failure to propose a damaged sewer water lateral program for its low income customers, its proposal to change the scope of collection of its PENNVEST surcharge, its proposal to increase the DSIC from its currently authorized 5% to 7.5%, as well as its proposal to institute a multi-year, multi-step rate increase.

V. Consolidation of Proceedings

On June 4, 2025, Pittsburgh Water filed a Petition for Authorization to Increase Water and Wastewater DSIC (DSIC Petition) (Docket No. P-2025-3055650; P-2025-3055652). On June 4, 2025, Pittsburgh Water also filed a Petition for Consolidation of Water, Wastewater and Stormwater Rate Proceedings and for Authorization to Use Combined Water, Wastewater and Stormwater Revenue Requirements (Consolidation Petition) (Docket No. R-2025-3055010; R-2025-3055011; R-2025-3055012).

On June 26, 2025, Pittsburgh Water filed its Petition to Consolidate DSIC Increase Petition and Base Rate Case Filings for Water, Wastewater and Stormwater (DSIC Consolidation Petition) (Docket Nos. P-2025-3055650; P-2025-3055652; Docket No. R-2025-3055010; R-2025-3055012; R-2025-3055012).

Pittsburgh United OWT does not oppose Pittsburgh Water's Consolidation Petition, or the consolidation of the DSIC Petition in the Authority's base rate filings. However, Pittsburgh United OWT is concerned that Pittsburgh Water's underlying requests contained in its DSIC Petition are not sufficiently precise and lack the requisite support to warrant granting the Authority's requested relief. At this point, Pittsburgh United OWT has not fully developed its position on the need for an increase in the DSIC and reserves the right to challenge this requested increase in the context of this proceeding but does not oppose the consolidation of this issue with the rate case docket.

VI. Petition For Waiver of Statutory Definition of FPFTY

On June 4, 2025, Pittsburgh Water filed a Petition for Waiver of Statutory Definition of Fully Projected Future Test Year (FPFTY) (Docket Nos. P-2025-3055587, and P-2025-3055588).

Pittsburgh United OWT does not oppose Pittsburgh Water's Petition for Waiver of Statutory Definition of FPFTY.

VII. Witnesses and Testimony

Pittsburgh United OWT intends to sponsor testimony of the following witness in this matter, and reserves the right to call additional witnesses as may be warranted upon notice to Your Honor and parties:

Patrick Cicero, Esq.
118 Locust Street
Harrisburg, PA 17101
pcicero@pautilitylawproject.org

Mr. Cicero will address the issues identified above, as well as any other relevant issues that may arise through the course of this proceeding.

VIII. Discovery

Pittsburgh United OWT supports the discovery modification proposed by the Office of Consumer Advocate in their Prehearing Memorandum.

IX. Settlement

Pittsburgh United OWT is willing and ready to engage in settlement discussions with any and all parties to resolve or narrow the issues in this proceeding, and encourages the parties to set aside time early in the process for meaningful settlement discussions to commence.

X. Litigation Schedule

Pittsburgh United OWT is actively working with the parties to arrive at a mutually agreeable schedule for litigation. As of the date of the filing of this Prehearing Conference Memorandum, the parties are in discussion. In the absence of an agreement between the parties related to a proposed procedural schedule, Pittsburgh United OWT supports the following:

Direct Testimony - Other Parties	September 5, 2025
Rebuttal Testimony	September 30, 2025
Surrebuttal Testimony	October 14, 2025
Written Rejoinder	October 20, 2025
Evidentiary Hearings	October 21-23, 2025
Main Briefs	November 10, 2025
Reply Briefs	November 21, 2025

XI. Public Input Hearings

Given the size of the requested rate increases and the customer impact it may cause, Pittsburgh United OWT respectfully requests that public input hearings be held in this matter.

WHEREFORE, Pittsburgh United OWT respectfully submits this Prehearing Conference Memorandum.

Respectfully submitted,

PENNSYLVANIA UTILITY LAW PROJECT
Counsel for Pittsburgh United Our Water Table



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Date: July 11, 2025

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Pittsburgh Water and Sewer Authority	:	
d/b/a Pittsburgh Water	:	

CERTIFICATE OF SERVICE

I hereby certify that I have, on this day, served copies of the **Prehearing Conference Memorandum of Pittsburgh United Our Water Table** in the above captioned matter upon the following persons and in accordance with the requirements of 52 Pa. Code § 1.54.

SERVICE VIA EMAIL ONLY

Deanne O’Dell, Esq. Lauren Burge, Esq. Daniel Clearfield, Esq. Eckert Seamans Cherin & Mellott, LLC 213 Market Street, 8 th Fl. Harrisburg, PA 17101 dodell@eckertseamans.com lburge@eckertseamans.com dclearfield@eckertseamans.com	Scott B. Granger, Esq. Michael A. Podskoch, Jr., Esq. Bureau of Investigation & Enforcement Commonwealth Keystone Building 400 North St., 2nd Floor West Harrisburg, PA 17120 sgranger@pa.gov mpodskoch@pa.gov
Christine Appleby, Esq. Harrison Breitman, Esq. Barrett Sheridan, Esq. Dave Evrard, Esq. Office of Consumer Advocate 555 Walnut St., 5th Fl., Forum Place Harrisburg, PA 17101-1923 OCAPWSA2025@paoca.org	Steven C. Gray, Esq. Rebecca Lyttle, Esq. Office of Small Business Advocate Forum Place Building 555 Walnut Street, 1st Floor Harrisburg, PA 17101 sgray@pa.gov relyttle@pa.gov
John F. Doherty, Esq. Krysia Kubiak, City Solicitor, The City of	

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Respectfully Submitted,
PENNSYLVANIA UTILITY LAW PROJECT
Counsel for Pittsburgh United's Our Water Table



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