



COMMONWEALTH OF PENNSYLVANIA
PENNSYLVANIA PUBLIC UTILITY COMMISSION
COMMONWEALTH KEYSTONE BUILDING
400 NORTH STREET, HARRISBURG, PA 17120

BUREAU OF
INVESTIGATION
&
ENFORCEMENT

July 18, 2025

Via Electronic Filing

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
R-2025-3053573

I&E Prehearing Memorandum

Dear Secretary Homsher:

Enclosed for electronic filing please find the Prehearing Memorandum of the Bureau of Investigation and Enforcement in the above-captioned proceeding.

Copies are being served on parties per the attached Certificate of Service. Should you have any questions, please do not hesitate to contact me.

Sincerely,

A handwritten signature in black ink that reads 'Carrie B. Wright'.

Carrie B. Wright
Deputy Chief Prosecutor
Bureau of Investigation and Enforcement
PA Attorney ID No. 208185
(717) 783-6156
carwright@pa.gov

CBW/ac
Enclosures

cc: Administrative Law Judge John M. Coogan (via email – jcoogan@pa.gov)
Administrative Law Judge Emily A. Farren (via email – efarren@pa.gov)
Per Certificate of Service

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission	:	
	:	
v.	:	Docket Nos. R-2025-3053442
	:	R-2025-3053573
The York Water Company	:	

**PREHEARING MEMORANDUM
OF THE
BUREAU OF INVESTIGATION AND ENFORCEMENT**

TO ADMINISTRATIVE LAW JUDGES JOHN M. COOGAN AND EMILY A. FARREN:

The Bureau of Investigation and Enforcement (“I&E”) of the Pennsylvania Public Utility Commission (“Commission”) respectfully submits the following Prehearing Memorandum in the above-captioned proceeding.

The Bureau of Investigation and Enforcement Prosecutor in this proceeding will be Carrie B. Wright. Contact information is as follows:

By mail: Carrie B. Wright
Pennsylvania Public Utility Commission
Bureau of Investigation and Enforcement
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17120

By e-mail: carwright@pa.gov

By telephone: (717) 783-6156

I. INTRODUCTION

On May 30, 2025, the York Water Company (“York” or “Company”) filed both a water and wastewater base rate case. These filings propose a general increase in water rates of \$20,311,978 per year, or 28.9%, and a general increase in wastewater rates of \$3,857,507 per year, or 44.5%.

York provides service to approximately 73,089 water customers and 6,682 wastewater customers in parts of York, Adams, Franklin and Lancaster Counties.

The Pennsylvania Public Utility Commission (“PUC” or “Commission”) entered an order suspending the implementation of this rate increase by operation of law until March 1, 2026, and opening an investigation to determine the lawfulness, justness, and reasonableness of the rates, rules, and regulations contained in the rate case filing. Further, the matter was assigned to the Office of Administrative Law Judge (“OALJ”) to schedule such hearings as necessary to develop a record in this proceeding.

A telephonic Prehearing Conference is scheduled for Tuesday, July 22, 2025, at 10:00 am, with Administrative Law Judges John M. Coogan and Emily A. Farren presiding.

II. ISSUES

The following list represents I&E’s preliminary determination of the potential issues in these proceedings. The listing is as complete as can be made at this time. I&E specifically reserves the right to address other issues, as it deems appropriate if any such relevant issues arise. The issues are as follows:

- Rate of Return
 - Overall Rate of Return
 - Cost of Equity
 - Cost of Debt
 - Capital Structure
 - Risk Analysis

- Operation and Maintenance Expenses, including but not limited to:
 - Chemical Expense
 - Salaries and Wages
 - Employee Benefits Expense
 - Directors Fees
 - Administrative and General Expenses
 - Pension Expense
 - Customer Account Expenses
 - Membership Expenses
 - Taxes Other Than Income
 - Income Tax Expense
 - Cash Working Capital

- Rate Base/Rate Structure/ Revenue Allocation
 - Plant In Service
 - Plant Additions
 - Present and Proposed Revenue
 - Cost Allocation
 - Cost of Service Study
 - Rate Design
 - Scale Back of Rates

III. WITNESSES

It is currently expected that I&E may call the following expert witnesses without being limited thereto:

- Ethan Cline, Fixed Utility Valuation Engineer
- Christopher Keller, Fixed Utility Financial Analyst
- Drew Breuning, Fixed Utility Financial Analyst

The I&E witnesses may be contacted through the information listed above for Prosecutor Wright. The witness list is provided without the benefit of complete discovery or analysis of the positions of potential other parties to this proceeding. Accordingly, I&E reserves the right to call additional witnesses or withdraw the name of the witnesses listed above. In the event that I&E decides to call additional witnesses, I&E will notify the ALJs and the parties as soon as possible.

IV. EVIDENCE

I&E expects to present all written direct, rebuttal and surrebuttal testimony and accompanying exhibits at the evidentiary hearing. Moreover, I&E intends to rely on the Company's filing, answers to data requests and interrogatories, annual reports and other documents submitted to the Commission, other relevant Commission filings, any other relevant Commonwealth agency letters or reports, general financial market information sources and other public documents and reports.

V. DISCOVERY

Pursuant to 52 Pa. Code §§5.322 and 5.331(b), discovery has begun and is ongoing. I&E supports the discovery modifications proposed by OCA.

VI. SCHEDULE

I&E will work with the parties to develop a mutually agreeable schedule in this proceeding.

Given that this proceeding involves multiple Commission employees who are based out of the Harrisburg PUC offices, I&E request that if in person hearings are held, those hearings be held in Harrisburg in order to conserve the Commission's financial resources. To the extent that it is determined that no party has cross examination of any witnesses in this proceeding, I&E respectfully requests that the ALJs consider holding those hearings telephonically.

VII. PUBLIC INPUT HEARINGS

I&E will participate in any public input hearings scheduled in this matter but takes no position on the number to be held or the locations thereof.

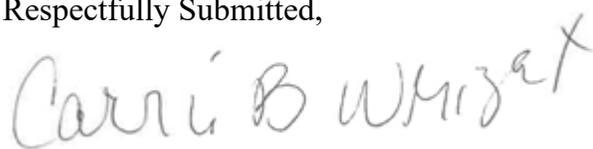
VIII. SERVICE OF DOCUMENTS

For purposes of satisfying in-hand requirements for discovery responses, prepared testimony and briefs, I&E will accept and prefers electronic delivery of documents with out the need to follow up with hard copies.

IX. SETTLEMENT

I&E is willing to make good faith efforts to successfully resolve this matter through settlement. In the event settlement discussions fail to result in a full and complete resolution of the matter, I&E is prepared to fully or partially litigate this proceeding.

Respectfully Submitted,

A handwritten signature in black ink that reads "Carrie B. Wright". The signature is written in a cursive style and is enclosed within a thin black rectangular border.

Carrie B. Wright
Prosecutor
PA Attorney ID No. 208185

Pennsylvania Public Utility Commission
Bureau of Investigation and Enforcement
Commonwealth Keystone Building
400 North Street
Harrisburg, Pennsylvania 17120
(717) 783-6156

Dated: July 18, 2025

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission	:	
	:	
v.	:	Docket Nos. R-2025-3053442
	:	R-2025-3053573
The York Water Company	:	

CERTIFICATE OF SERVICE

I hereby certify that I am serving the foregoing **Prehearing Memorandum** dated July 18, 2025, in the manner and upon the persons listed below:

Served via Electronic Mail Only

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