

COMMONWEALTH OF PENNSYLVANIA



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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 (W)
R-2025-3053573 (WW)

Dear Secretary Homsher:

Attached for electronic filing please find the Office of Consumer Advocate's Prehearing Memorandum in the above-referenced proceeding.

Copies have been served on the parties as indicated on the enclosed Certificate of Service.

Respectfully submitted,

/s/ Ryan Morden
Ryan Morden, Esq.
Assistant Consumer Advocate
PA Attorney I.D. # 335679
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Enclosures

cc: Administrative Law Judge John M. Coogan (Via Email: jcoogan@pa.gov)
Administrative Law Judge Emily A. Farren (Via Email: efarren@pa.gov)
Certificate of Service

CERTIFICATE OF SERVICE

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

I hereby certify that I have this day filed electronically on the Commission’s electronic filing system and served a true copy of the following document, the Office of Consumer Advocate’s Prehearing Memorandum, upon parties of record in this proceeding in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant), in the manner and upon the persons listed below.

Dated this 18th day of July, 2025

SERVICE BY E-MAIL ONLY

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Email: OCAYork2025@paoca.org

Dated: July 18, 2025

Counsel for:
Darryl A. Lawrence
Consumer Advocate

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

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

PREHEARING CONFERENCE MEMORANDUM
OF THE
OFFICE OF CONSUMER ADVOCATE

Pursuant to the Prehearing Conference Order issued on July 14, 2025, in the above-captioned proceeding, by the Honorable Administrative Law Judges (ALJs) John M. Coogan and Emily A. Farren, of the Office of Administrative Law Judge (OALJ) of the Pennsylvania Public Utility Commission (Commission), and pursuant to Section 333 of the Public Utility Code (Code), 66 Pa. C.S. Section 333, and the Commission’s regulations at 52 Pa. Code Sections 5.221-5.224, the Pennsylvania Office of Consumer Advocate (OCA) submits the following Prehearing Conference Memorandum.

I. INTRODUCTION AND PROCEDURAL HISTORY

On May 30, 2025, the York Water Company and the York Water Company – Wastewater Division (collectively, York or the Company) filed Supplement No. 165 to Tariff Water-Pa. P.U.C. No. 14 (Supplement No. 165) and Supplement No. 26 to Tariff Wastewater-Pa. P.U.C. No. 1 (Supplemental No. 26), respectively, to become effective August 1, 2025. The Company proposes to increase water service rates to produce additional annual revenues of approximately \$20.3

million. The Company additionally proposes to increase wastewater rates to produce additional annual revenues of approximately \$3.8 million.

York serves approximately 73,100 water customers and 6,700 wastewater customers. The Company provides water service and wastewater service in parts of York, Adams, Franklin, and Lancaster Counties, Pennsylvania.

Under the Company's proposal, the monthly water bill for residential gravity customers using 4,383 gallons per month would increase from \$47.78 to \$58.26 per month, or by 21.9%. The water bill for residential repumped customers using 3,672 gallons per month would increase from \$56.48 to \$72.26 per month, or by 27.9%. This amount includes York's proposal to increase the 5/8-inch water customer charge for gravity and repumped customers from \$17.25 to \$24.85 per month, which is an increase of \$7.60 or of 44.1%.

According to the customer notices included in York Water's filing, under the Company's proposal, the typical wastewater bill for residential customers using a range of 4,011 gallons per month to 4,800 gallons per month would experience a bill increase ranging from 7.7% to 87.2%. The actual bill increase a customer would experience would depend on the service area in which the customer resides and the customer's usage.

York's proposed rate increases for water and wastewater, if approved, would produce an overall rate of return of 8.01% that includes a common equity cost rate of 10.90% and a cost of debt rate of 4.54%. The request for a 10.90% return on equity includes the Company's request for a Business Risk, Flotation Cost, and Performance Factor Adjustments. The Company also proposes utilizing a capital ratio of 54.58% common equity and 45.42% debt for ratemaking purposes. In its base rate filing, the Company utilizes a fully projected future test year ending February 28, 2027.

York proposes to include the assets of nine newly acquired water systems and six newly acquired wastewater systems in its rate base. York has requested special ratemaking treatment for these acquired systems pursuant to 66 Pa. C.S. Section 1327, claiming that the Company should be able to either include the purchase price or the depreciated original cost of each system, whichever is greater.

On June 5, 2025, the Commission's Bureau of Investigation and Enforcement (I&E) filed a Notice of Appearance.

On June 11, 2025, the OCA filed a Formal Complaint, Public Statement, and Notice of Appearance in this proceeding to protect the interests of consumers in the Company's service territory and to ensure that the Company is permitted to implement only a level of rates that is just and reasonable and in accordance with sound ratemaking principles.

On June 12, 2025, the Office of Small Business Advocate (OSBA) filed a Notice of Appearance. On June 18, 2025, OSBA filed a Formal Complaint and Public Statement.

On July 10, 2025, the Commission issued Orders that initiated an investigation into the lawfulness, justness, and reasonableness of the proposed rate increases in the Company's water and wastewater filings in addition to the Company's existing rates, rules, and regulations, assigned this matter to the OALJ for further proceedings as appropriate, and suspended the effective date of the tariff until March 1, 2026.

II. ISSUES

Based upon a preliminary analysis of York's general rate increase filings for water and wastewater service, the OCA has compiled a list of issues and sub-issues which it anticipates will be included in its investigation of the Company's rate requests. It is anticipated that other issues

may arise and may be pursued once the answers to all the OCA's interrogatories have been received and analyzed.

The issues and sub-issues set forth below, and others that may develop during discovery, will be analyzed and presented as appropriate by the OCA with the assistance of its expert witnesses:

A. Rate of Return

1. The OCA will perform a detailed analysis of the cost of common equity claimed by the Company as well as the overall rate of return as claimed by the Company. Also, the OCA will carefully examine the Company's methodologies and supporting data used to develop its final cost of common equity claim.

2. The OCA will examine whether the capital structure proposed by the Company is representative of the period in which rates will be in effect and is otherwise appropriate for ratemaking purposes.

3. The OCA will examine the embedded cost of debt claimed by the Company to determine whether it is reasonable and appropriate for ratemaking purposes.

4. The OCA will examine whether any company-specific adjustments proposed by the Company are justified.

B. Rate Base/ Measure of Value

1. The OCA will examine the reasonableness and accuracy of Company's projections related to the utility plant in service at the time relevant to this proceeding.

2. The OCA will review the Company's claim for plant additions during the Future Test Year (FTY) and Fully Projected Future Test Year (FPFTY).

3. The OCA will investigate whether the Company's adjustment to rate base for depreciation reserve is appropriate.

4. The OCA will examine the Company's projections of non-investor supplied funds, including but not limited to, customer deposits, customer advances for construction, and contributions in aid of construction.

5. The OCA will examine the Company's proposal to include unamortized balances in rate base.

6. The OCA will examine the Company's claim for materials and supplies.

7. The OCA will examine the Company's calculation and amount of cash working capital.

8. The OCA will examine the reasonableness and lawfulness of rate base claims for amounts paid to affiliates, in accordance with Section 2101 of the Public Utility Code. 66 Pa. C.S. § 2101 *et seq.*

9. The OCA will examine the Company's Accumulated Deferred Income Tax (ADIT) balances and excess ADIT balances.

10. The OCA will examine the reasonableness of the Company's proposed Allowance for Funds Used During Construction (AFUDC) for land held for future use.

C. Revenues and Expenses

1. The OCA will examine the Company's claimed revenues and any adjustments to the level of revenues.

2. The OCA will seek to ascertain whether the Company's claimed expenses are supported, reasonable, and appropriate.

3. The OCA will examine whether the projected number of customers in the FTY and FPFTY are reasonable and accurate.

4. The OCA will examine whether the Company's claims of sales and revenues during the FTY and FPFTY are reasonable and accurate.

5. The OCA will examine whether the Company's projections of revenues in the future periods are reasonable and accurate including, but not limited to, its billed days adjustments, metered sales and the impact of conservation measures, and miscellaneous revenue adjustments.

6. The OCA will examine whether the Company's projections of number of employees, overtime, and incentive pay are reasonable and accurate.

7. The OCA will examine the costs associated with the accrual of retirement benefits other than pensions for the Company's employees or contributions to pension funds.

8. The OCA will examine the justness and reasonableness of the Company's employee healthcare expense.

9. The OCA will examine the appropriateness of the Company's pro forma claim for rate case expense.

10. The OCA will examine the reasonableness of the Company's proposed purchased power expense claims.

11. The OCA will examine the Company's request for depreciation expenses to determine whether it is just and reasonable.

12. The OCA will examine the justness and reasonableness of the Company's claim for insurance costs.

13. The OCA will examine the justness and reasonableness of the Company's proposed expense amortizations.

14. The OCA will examine the justness and reasonableness of the Company's claim for regulatory commission costs.

15. The OCA will examine the justness and reasonableness of the Company's claims for other operations and maintenance expenses.

16. The OCA will examine the justness and reasonableness of the Company's claimed rate case normalization period.

17. The OCA will examine any cost savings identified in the most recent Management and Operations Audit should be reflected, if relevant, which was conducted since the Company's prior general rate increase request was filed.

18. The OCA will examine the justness and reasonableness of the Company's claimed uncollectibles expense.

19. The OCA will examine the Company's claimed revenues and any adjustments to the level of revenues.

D. Taxes

1. The OCA will examine issues related to the calculation of taxes including, but not limited to, calculation of federal and state income taxes and the amount of those taxes included as expenses for ratemaking purposes and will examine whether the Company is in compliance including with Act 40 of 2016 (66 Pa. C.S. § 1301.1).

2. The OCA will examine the reasonableness of the Company's proposal regarding the tax repairs deductions, and its claims for income taxes, property taxes, and general assessments.

3. The OCA will examine the effect of the Tax Cuts and Jobs Act on the Company's tax expense and its ADIT accounts and the amount, if any, that needs to be returned to ratepayers as a result.

4. The OCA will examine the Company's level of Public Utility Reality Tax (PURTA) and property tax expense.

E. Rate Structure/ Cost of Service / Rate Design/ Tariffs/ Alternative Ratemaking

1. The OCA will examine the reasonableness of Company's proposed distribution or allocation of the revenue increases among customer classes to determine whether the proposal meets all legal requirements and sound ratemaking principles.

2. The OCA will examine Company's cost of service studies, including the methodology used and the reasonableness of the allocations.

3. The OCA will examine the reasonableness and appropriateness of the Company's proposed tariff changes, including all proposed surcharges.

4. The OCA will examine all other cost allocation and rate design proposals.

F. Depreciation

1. The OCA will examine the Company's depreciation study, including the proposed service lives, net salvage rates, and depreciation rate calculations to determine if they are reasonable.

2. The OCA will analyze the depreciation rates based upon the actuarial analysis to determine if any modifications are necessary.

G. Low-Income Programs

1. The OCA will analyze current and proposed Company operations, practices, procedures and outreach related to serving low-income customers.

2. The OCA will assess the impact of the Company's proposed rate increases on universal service, including the overall costs of customer assistant programs as affected by the Company's rate design.

3. The OCA will review the Company's current bill discount programs, arrearage management programs, or lack thereof, and proposed changes to the programs.

4. The OCA will review the Company's affordability analysis.

H. Quality of Service

1. The OCA will review the Company's quality of service to ensure that it is providing safe, adequate, and reliable service that is consistent with the requirements of Section 1501 of the Public Utility Code.

2. The OCA will investigate the quality of service complaints by the Company's customers.

I. Customer Service

1. The OCA will review the Company's consumer protection policies and programs in order to ensure compliance with Chapter 56 of the Commission's regulations.

2. The OCA will examine the Company's customer service, including performance trends, internal training, management oversight, policies, and programs.

3. The OCA will examine the Company's consumer education programs, particularly with regard to changes in billing and collection rights and remedies, and complaint processes.

4. The OCA will examine the Company's compliance and reporting as required in the last rate case concerning service and service quality.

5. The OCA will examine the Company's request for a management performance adder to its return on equity and rate of return in light of the Company's customer service performance.

6. The OCA will examine the Company's response to the most recent Commission Management Audit.

J. Other Issues

1. The OCA will examine any relevant issues that arise as a result of the Company's operations.

2. The OCA will investigate to ensure that the Company is complying with all prior orders.

3. The OCA reserves the right to examine other issues affecting the Company's revenue requirements, rates, charges, and other tariff provisions as they are identified through discovery.

III. WITNESSES

The OCA intends to present the direct, rebuttal, and surrebuttal testimonies, as may be necessary, of the below witnesses. Each witness will present testimony in written form and will attach various exhibits, documents, and explanatory information, as may be necessary. In order to expedite the resolution of this proceeding, the OCA requests that copies of all interrogatories, testimony, and answers to interrogatories be mailed and/or emailed directly to the OCA's group email formed particularly for this proceeding.

Revenue Requirement / Accounting

Dante Mugrace
PCMG and Associates
90 Moonlight Court
Toms River, NJ 08753

Cost of Service / Rate Structure/ Rate Design	Jerome Mierzwa Exeter Associates, Inc. 10480 Little Patuxent Parkway Suite 300 Columbia, Maryland 21044
Rate of Return / Cost of Capital / Capital Structure	David J. Garrett Resolve Utility Consulting PLLC 101 Park Avenue Suite 1125 Oklahoma City, OK 73102
Depreciation	James Garren GDS Associates Inc. 1850 Parkway Place, Suite 800 Marietta, GA 30067
Quality of Customer Service / Tariff / Low- Income Customer Concerns	Barbara R. Alexander 44 Beech St. Hallowell, ME 04347

The OCA specifically reserves the right to call additional witnesses, as necessary, and retains the flexibility to have the witnesses above address other areas of this case as the case proceeds. If the OCA determines that additional witnesses will be necessary for any portion of its case, it will notify all parties of record immediately.

IV. PROPOSED SCHEDULE

The OCA is continuing to work with York and the parties on a procedural schedule that is a reasonable compromise of the parties' competing interests within the time afforded for litigation of this matter. The OCA proposes the following schedule:

Public Input Hearings	Week of August 11, 2025
Other Parties' Direct Testimony	Friday, August 22, 2025
Other Parties' Supplemental Direct Testimony Regarding Public Input Hearings	May be needed depending on timing of public input hearings and other party direct testimony
Rebuttal Testimony (all parties and all issues)	Friday, September 19, 2025
Surrebuttal Testimony (all parties and all issues)	Monday, October 6, 2025
Written Rejoinder Testimony or Outline	Friday, October 10, 2025 (by 4:00 p.m.)
Evidentiary Hearings	Thursday, October 16, 2025 through Friday, October 17, 2025
Main Briefs	Wednesday, October 29, 2025
Reply Briefs	Monday, November 10, 2025

The OCA requests that the dates included in any litigation schedule in this matter be considered “in-hand” dates and that electronic service on the due date will satisfy the “in-hand” requirement.

V. SERVICE ON THE OCA

The OCA respectfully requests that the Presiding Officers permit electronic service without the requirement of a follow-up hard copy. The OCA will be represented in this case by the attorneys listed below:

Jacob Guthrie, Assistant Consumer Advocate
Katie Kennedy, Assistant Consumer Advocate
Ryan Morden, Assistant Consumer Advocate
555 Walnut Street, 5th Floor, Forum Place
Harrisburg, PA 17101-1923
Phone: (717) 783-5048
E-Mail: OCAYork2025@paoca.org

The OCA has created a group e-mail address provided above. This is the only email address that is required for service on the OCA. The OCA's group email address will provide the emailed materials to all members of the OCA team including the consultants listed above.

For the purposes of the Prehearing Conference, Jacob Guthrie will be the primary attorney speaking on behalf of the OCA.

VI. SERVICE ON CONSUMER COMPLAINANTS

For consumers who have filed formal complaints against the proposed general rate increase, the OCA requests that the ALJs instruct the parties on the record at the prehearing conference as to which consumers should be included on the official service lists as active complainants and which consumer complainants should be excluded from the official service list as inactive complainants.

Practically speaking, being on an official service list means a consumer will be served with a high volume of documents that are served on parties in the proceeding, and not all consumers have an expectation of this result by filing a formal complaint in a rate case. In this proceeding, the OCA's understanding is that the ALJs intend to treat a consumer complainant as inactive complainant if the complainant has not indicated either at the prehearing conference, or prior to the prehearing conference, that they wish to be an active complainant in this proceeding.

VII. SETTLEMENT

The OCA will participate in settlement discussions in this matter.

VIII. DISCOVERY

In conjunction with its proposed schedule, the OCA proposes the following modifications to the Commission's procedural rules regarding discovery. The OCA requests that the Presiding Officers direct that the modifications will take effect when addressed during the on the record prehearing conference and apply to all future discovery requests served on and after the date of the prehearing conference on July 22, 2025. The OCA also requests that any outstanding interrogatories or requests for admissions are due no later than 10 calendar days after the Prehearing Conference to the extent such responses are due later than such date, in accordance with Paragraph A below.

- A. Answers to written interrogatories and requests for document production, entry for inspection, or other purposes shall be served in-hand within ten (10) calendar days of service.
- B. Objections to interrogatories and/or requests for production shall be communicated orally to the propounding party within three (3) calendar days of service of the interrogatories; unresolved objections shall be served in writing to the propounding party within five (5) calendar days of service of the interrogatories and/or requests for production.
- C. Motions to dismiss objections and/or direct the answering of interrogatories and/or requests for production shall be filed within five (5) business days of service of written objections.
- D. Answers to motions to dismiss objections and/or answering of interrogatories and/or requests for production shall be filed within three (3) business days of service of such motions.
- E. Requests for admissions will be deemed admitted unless answered within ten (10) calendar days or objected to within five (5) calendar days of service.
- F. Answers to on-the-record data requests shall be served in-hand within five (5) calendar days of the requests.
- G. Any discovery or discovery-related pleadings (such as objections, motions, and answers to same) served after served after 4:30 p.m. Monday through Thursday or after 1:30 p.m. on a Friday or the day before a holiday will be deemed to have been served on the next business day for purposes of calculating the due date for any responsive filing.

After rebuttal is served, the OCA proposes that the deadlines should be reduced as follows:

- A. Answers to interrogatories and responses to requests for document production, entry for inspection, or other purposes shall be served within five (5) calendar days of service of the interrogatories or requests for production.
- B. Objections to interrogatories and/or requests for production shall be communicated orally to the propounding party within two (2) calendar days of service; unresolved objections shall be served on the propounding party in writing within three (3) calendar days of service of the interrogatories and/or requests for production.
- C. Motions to dismiss objections and/or direct the answering of interrogatories and/or requests for production shall be filed within three (3) business days of service of written objections.
- D. Answers to motions to dismiss objections and/or direct the answering of interrogatories and/or requests for production shall be filed within three (3) business days of service of such motions.
- E. Requests for admission shall be deemed admitted unless answered or objected to within three (3) calendar days of service.
- F. Discovery requests and discovery related pleadings (such as objections, motions, and answers to same) served after 4:30 p.m. Monday through Thursday or after 1:30 p.m. on a Friday or the day preceding a holiday shall be deemed to have been served on the next business day.

IX. PREHEARING PROCEDURES

The OCA requests that the ALJs in their Prehearing Conference Order and Evidentiary Hearing Notice clarify that:

- A. Evidentiary hearing exhibits need not include all pre-served testimony which is circulated to the ALJs and parties in this proceeding in accordance with the above-referenced procedural schedule. However, such pre-served testimony may be identified for movement into the record at the hearing through an inventory of pre-served testimony which is provided as a hearing exhibit.
- B. Evidentiary hearing exhibits may be provided to the ALJs and parties by **10 am the day before** the start of evidentiary hearings with the exception of hearing exhibits related to rejoinder which may be provided by the end of the day that they are presented.

C. For evidentiary hearings conducted in-person, evidentiary hearing exhibits may be sent to the court reporter electronically. This is in the interest of the environment and saving ratepayers money from the expenditure of printing voluminous hard copies.

D. For evidentiary hearings conducted in-person, attorneys may submit requests to the ALJs:

i. Five days before the start of the evidentiary hearings for permission for witnesses to appear telephonically. This is in the interest of judicial economy and saving ratepayer dollars from expenditures for witness travel, lodging and boarding; or

ii. Two days before the start of evidentiary hearings for permission for Attorneys to appear telephonically if the only matter at hand is moving evidence into the record.

X. PUBLIC INPUT HEARINGS

The OCA will be prepared to discuss public input hearings at the prehearing conference. Given the magnitude of the requested rate increases, the size of the customer base, and the requests for public input hearings and complaints received thus far in this matter, the OCA respectfully requests that both in-person and telephonic public input hearings be held for York's customer base impacted by this rate filing.

Attached as Appendix A is the OCA's proposed draft Notice for the Public Input Hearing (to be completed with details as determined by the presiding ALJs). The OCA requests the following:

A. Given the size of the customer base and service territory, a total of four (4) Public Input Hearings be held, two in-person and two telephonic.

B. The in-person public input hearings include a combination of daytime and evening hearings at a location with accessible and free parking or easy access to public transportation.

C. The telephonic public input hearings include a combination of daytime and evening hearings.

D. Pre-registration be either encouraged or required for telephonic hearings only, and if required, pre-registration be required by 10:00 a.m. on the day of the telephonic Public Input Hearing at which the witness seeks to testify.

E. Hearing exhibits be required to be submitted to the ALJs by 10:00 a.m. the day before the Public Input Hearing at which the witness seeks to testify.

F. The Commission's notice of the Public Input Hearings will include the phone numbers and access codes necessary for participants to use to fully access all telephonic Public Input Hearings.

G. York will be required to, at a minimum, generate a notice of the Public Input Hearings that contains relevant information as to date, time, location, and phone numbers and access codes and further be required to advertise the notice: (1) in the general readership section (not legal section) of local newspapers within the service territory; (2) on its website; and (3) in social media posts which the York utilizes to advertise generally.

H. That the other parties involved in the proceeding, including the OCA, be permitted to review these public input announcements prior to their publication and distribution and have input into which publications the ads are placed.

XI. COMMON BRIEFING OUTLINE

The OCA requests that, when the ALJs issue their Instructions for Briefs, the common outline provided by the ALJs will include Roman numeral-level headers for an Overall Position on Rate Increase section following the Summary of Argument section, as well as Customer Service / Quality of Service, Customer Assistance Programs, and Tariff Issues (not otherwise briefed) sections of the brief which follow Rate Structure / Rate Design and precede the Conclusion. The OCA also recommends removing any "Fair Value" heading from the Rate Base section. The OCA's proposals for the common briefing outline are attached as Appendix B to this Prehearing Memorandum.

XII. CONCLUSION

The OCA respectfully requests that the Honorable ALJs John M. Coogan and Emily A. Farren grant the OCA's requests stated herein regarding the procedural schedule, discovery modifications, prehearing procedures, public input hearings, and common briefing outline.

Counsel for:
Darryl A. Lawrence
Consumer Advocate

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5th Floor, Forum Place
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(717) 783-5048

DATED: July 18 2025

Respectfully submitted,

/s/ Ryan Morden
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Jacob D. Guthrie, Esq.
Assistant Consumer Advocate
PA Attorney I.D. # 334367
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Katie Kennedy
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OCA APPENDIX A

NOTICE OF IN-PERSON AND TELEPHONIC PUBLIC INPUT HEARINGS

For York Water Company and York Water Company's Wastewater Division

Docket Nos.

R-2025-3053442 (W)

R-2025-3053573 (WW)

The Pennsylvania Public Utility Commission (PUC) will conduct four Public Input Hearings concerning the general rate increase requests filed by York Water Company on May 30, 2025, seeking to increase water rates by approximately \$20.3 million. York is also seeking to raise wastewater rates by \$3.8 million. The in-person and telephonic hearings will be held at the following times and places:

Presiding Officers: Administrative Law Judges John M. Coogan and Emily A. Farren

IN-PERSON PUBLIC INPUT HEARINGS

Pre-registration is not required.

Date: [Here]

Time: [Here]

Location: [Here]

Date: [Here]

Time: [Here]

Location: [Here]

TELEPHONIC PUBLIC INPUT HEARINGS

Pre-registration is [encouraged/required]. Read below.

Date: [Here]

Time: [Here]

Pre-registration is [encouraged/required] by [same day] at 10AM.

Date: [Here]

Time: [Here]

Pre-registration is [encouraged/required] by [same day] at 10AM.

Toll-free Conference Number: xxx.xxx.xxxx

PIN Number: xxxxxxxx

- You must dial the toll-free Conference number above
- You must enter the PIN number above when instructed
- You must speak your name when prompted, and press #

- Then, the telephone system will connect you to the hearing

PRE-REGISTRATION FOR TELEPHONIC PUBLIC INPUT HEARINGS: To testify at the telephonic Public Input Hearings, pre-registration is [encouraged/required] by [day of the hearing] at 10AM. Failure to pre-register could result in you not being called to testify by the PUC judge. To pre-register to testify by telephone, please contact the PUC Judge's Legal Assistant, [name], by email at [email address] or by phone at [xxx.xxx.xxxx] and provide the requested information.

NEED ASSISTANCE WITH PRE-REGISTRATION? If you need assistance pre-registering to testify, you may have someone register for you, but they will need to provide the PUC Judge all the information listed above. Additionally, if more than one person in your household would like to testify, one person may pre-register for other individuals in the same household by providing the PUC Judge's Legal Assistant with the above-listed information for each individual.

REQUESTS FOR INTERPRETERS: If you require an interpreter, please pre-register as soon as possible. If you register too close to the hearing date, we may not have enough time to arrange for an interpreter. If you request an interpreter, the PUC will make reasonable efforts to have one present. AT&T Relay Service number for persons who are deaf or hearing-impaired: 1-800-654-5988.

HEARING EXHIBITS: If you have any hearing exhibits to which you will refer during the hearing, please email them to the PUC Judge's Legal Assistant, [name], at [email address]. The PUC Judge will forward your exhibits to all the parties. Exhibits for the public input hearing must be received by the PUC Judge by [the day before the hearing] at 10AM.

QUESTIONS? The Pennsylvania Office of Consumer Advocate (OCA) represents the interests of utility customers before the PUC. If you have questions about the public input hearings or the Company's requested rate increases, please contact the OCA toll free at 1-800-684-6560 or by email at consumer@paoca.org. Additionally, the OCA can help customers pre-register for the Public Input Hearings.

OTHER WAYS TO BE HEARD: If you want to be heard about the proposed rate increases but do not want or cannot testify at the Public Input Hearings, you may file a formal complaint or comment to the proposed rate increases. Please visit the PUC's website to use the applicable form available at <https://www.puc.pa.gov/complaints/formal-complaints/>

OCA APPENDIX B

OCA's Proposed Common Briefing Outline For General Rate Increase Proceeding

- I. Introduction
- II. Summary of Argument
- III. Overall Position on Rate Increase
- IV. Rate Base
 - A. Plant in Service
 - B. Depreciation Reserve
 - C. Additions to Rate Base
 - D. Deductions from Rate Base
- V. Revenues
- VI. Expenses
- VII. Taxes
- VIII. Rate of Return
- IX. Rate Structure and Rate Design
 - A. Cost of Service Study
 - B. Revenue Allocation
 - C. Rate Design/ Tariff Structure
 - D. Summary and Alternatives
- X. Customer Service / Quality of Service
- XI. Customer Assistance Programs
- XII. Tariff Issues (Not Briefed Above)
- XIII. Miscellaneous Issues
- XIV. Conclusion

Note: Appropriate modifications may be made. For instance, a party might add "Affiliated Interest Expenses" as a major topic heading or might brief only rate structure and not use other topic headings. A summary and alternatives should be provided under "Rate Structure" but the "Rate Base" and "Rate Structure" formats shown may be modified, as appropriate. Additional subheadings should be used, as appropriate.