

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

Travis Taylor,

Complainant,

v.

The York Water Company,

Respondent.

Docket No.:

F-2025-3057409

COMPLAINANT'S MEMORANDUM OF LAW REGARDING
RESTORATION OF SERVICE TIMING

I. ISSUE PRESENTED

Does 52 Pa. Code § 56.191's "3 calendar days" reconnection requirement apply to an Applicant (new customer) seeking reconnection at a dwelling where service had been terminated at the prior customer's request? Yes.

II. UNDISPUTED TIMELINE (PER RESPONDENT'S ANSWER)

- The prior customer requested shut-off at the service address effective August 22, 2025.
- On August 22, 2025, Complainant completed York Water's "start service" form; York Water states it received the form at 4:42 p.m. that day.
- York Water scheduled the earliest appointment for Tuesday, August 26, 2025, and restored service then.

III. CONTROLLING LAW

1) Restoration at a terminated dwelling — Applicants included (Subchapter G "Restoration of Service").

"When service to a dwelling has been terminated, the public utility shall reconnect service ...

(2) Applicants. When the applicant has met all applicable conditions: ... (iv) Within 3 calendar days from April 1 to November 30 for proper terminations; (v) Within 7 calendar days for proper terminations requiring street or sidewalk digging." 52 Pa. Code § 56.191(b)(2)(iv)–(v).

2) Applicant definition.

“Applicant — ... A natural person at least 18 years of age not currently receiving service who applies for residential service” 52 Pa. Code § 56.2.

3) General new■service timing (fallback rule).

“Once an applicant’s application for service is accepted by the public utility, the public utility shall make a bona fide attempt to provide service within 3 business days ... 7 business days if street or sidewalk digging is required.” 52 Pa. Code § 56.37.

4) Staffing to meet restoration deadlines.

“A public utility shall have adequate personnel available ... to restore service when required under this chapter, specifically in §§ 56.82 and 56.191.” 52 Pa. Code § 56.192.

IV. ARGUMENT

This matter concerns restoration at a dwelling that had been terminated at the prior customer’s request. Section 56.191 expressly governs reconnection timing for both existing customers and Applicants. Once York Water received and accepted Complainant’s application and all conditions were met on Friday, August 22, 2025 (as pled), § 56.191(b)(2)(iv) required reconnection within “3 calendar days” (Saturday 8/23 = day 1; Sunday 8/24 = day 2; Monday 8/25 = day 3). Restoration on Tuesday, August 26 exceeded the mandate.

Respondent’s assertion that the “3■day” provision does not apply to a “new customer start■service request” is contrary to the regulation’s plain text, which expressly covers “Applicants.” Internal scheduling constraints or lack of personnel do not excuse noncompliance, as § 56.192 requires adequate staffing to meet restoration deadlines. The general “3 business■day” new■service rule in § 56.37 does not displace the specific restoration timing mandated by § 56.191 for terminated dwellings.

V. REQUESTED RELIEF

Complainant respectfully requests that the Commission:

1. Find that York Water violated 52 Pa. Code § 56.191(b)(2)(iv);

2. Direct York Water to comply prospectively with 52 Pa. Code §§ 56.191 and 56.192;
3. Award appropriate relief, including a bill credit for the outage period and waiver/refund of any fees tied to the delayed restoration, and any further relief the Commission deems just and proper.

Dated: October 04, 2025

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Travis Taylor', written over a horizontal line.

Travis Taylor

2325 Slater Hill Ln E

York, PA 17402

443-605-9507

tjtaylo@gmail.com

(Pro se)

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true and correct copy of the foregoing
“Complainant’s Memorandum of Law Regarding Restoration of Service Timing” upon the
following party in accordance with 52 Pa. Code § 1.54 (relating to service by a participant), by
e-mail and first class mail, postage prepaid:

Alexandra C. Chiaruttini

General Counsel

The York Water Company

130 E. Market Street

York, PA 17401

alexc@yorkwater.com

Dated: October 04, 2025



Travis Taylor

VERIFICATION

I, Travis Taylor, verify that the facts set forth in the foregoing filing and attached exhibits that are based on my personal knowledge are true and correct to the best of my knowledge, information, and belief. I understand that false statements herein are made subject to the penalties of 18 Pa.C.S. § 4904 (relating to unsworn falsification to authorities).

Date: 10/04/2025

A handwritten signature in black ink, appearing to read 'T. Taylor', is written above a horizontal line.

Travis Taylor

EXHIBITS

Exhibit Index

Docket No.: F-2025-3057409

Exhibit A – York Water intake/CSR email thread showing:

- 4:42 p.m. Friday receipt/acceptance of Applicant's start service form.
- CSR statement that the earliest appointment was Tuesday (day four).
- Includes Complainant's forward of the thread to PUC BCS staff.

Dated: October 04, 2025

EXHIBIT A

York Water intake/CSR email thread (Aug. 22, 2025) showing:

- 4:42 p.m. Friday receipt/acceptance of start service form.
- CSR note that the earliest appointment was Tuesday.
- Includes Complainant's subsequent forward to PUC Bureau of Consumer Services.

Docket No.: F-2025-3057409

Following pages: email thread PDF as produced.



Travis Taylor <tjtaylo@gmail.com>

RE: Request for Water Service Application Submission - Taylor, Travis

11 messages

Customer Service <customer.service@yorkwater.com>
To: "tjtaylo@gmail.com" <tjtaylo@gmail.com>
Cc: Customer Service <customer.service@yorkwater.com>

Fri, Aug 22, 2025 at 4:55 PM

Hello,

Please give our office a call at 717-845-3601 to schedule an appointment. At the moment, the earliest appointment we have available wouldn't be until Tuesday.

Quiana Smiley

Customer Service Representative

The York Water Company

130 E. Market St.

York, PA 17401

E: quianas@yorkwater.com

P: (717) 845-3601 ext 2294

F: (717) 845-3792

www.yorkwater.com

NASDAQ: YORW



Confidentiality Notice: This electronic mail transmission is confidential and is intended only for the party or parties to whom it is addressed. If you have received this transmission in error, please immediately return it to the sender.

From: webreply@yorkwater.com <webreply@yorkwater.com>
Sent: Friday, August 22, 2025 4:42 PM
To: Customer Service <customer.service@yorkwater.com>
Subject: Request for Water Service Application Submission - Taylor, Travis

CAUTION: This email originated from outside your organization. Exercise caution when opening attachments or clicking links, especially from unknown senders.



The York Water Company

Request for Water Service Application Submission - 8/22/2025

Name: Travis Taylor

Effective: 08/22/25

Phone #: 4436059507

Email: tjtaylo@gmail.com

[View full Application for Water Service](#)

Travis Taylor <tjtaylo@gmail.com>
To: Customer Service <customer.service@yorkwater.com>

Fri, Aug 22, 2025 at 6:18 PM

Hello Ms. Smiley,

Thanks for the quick response. I took possession of the property today and submitted my start-service request. The home currently has no water.

Under 52 Pa. Code §56.191(b) (PUC Chapter 56), a public utility must restore residential water service within three (3) calendar days after the customer meets the utility's conditions to start service, provided no street or sidewalk excavation is required. Scheduling the first appointment for Tuesday would exceed that timeframe.

To my knowledge, no excavation is needed. Please expedite restoration to occur within the three-day window and confirm the earliest available date/time.

If necessary, I will contact the PA Public Utility Commission's Bureau of Consumer Services to request assistance, but I'm hopeful we can resolve this directly.

Thank you for your prompt attention.

[Quoted text hidden]

Customer Service <customer.service@yorkwater.com>
To: Travis Taylor <tjtaylo@gmail.com>
Cc: Customer Service <customer.service@yorkwater.com>

Mon, Aug 25, 2025 at 9:32 AM

Hello,

You will need to give our office a call to schedule an appointment 717-845-3601.

[Quoted text hidden]

Travis Taylor <tjtaylo@gmail.com>
To: Customer Service <customer.service@yorkwater.com>
Cc: Customer Service <customer.service@yorkwater.com>

Mon, Aug 25, 2025 at 9:34 AM

I've been trying all morning since 8:30. Waited on hold for 20 minutes, then it sent me to a voicemail, still no one has called me back.

[Quoted text hidden]

Travis Taylor <tjtaylo@gmail.com>
To: kforceberl@pa.gov

Thu, Sep 4, 2025 at 1:12 PM

[Quoted text hidden]

Force Berlanda, Karen <kforceberl@pa.gov>
To: Travis Taylor <tjtaylo@gmail.com>

Thu, Sep 4, 2025 at 1:23 PM

Did you call them when you received this email or was the office already closed?

From: Travis Taylor <tjtaylo@gmail.com>
Sent: Thursday, September 4, 2025 1:13 PM
To: Force Berlanda, Karen <kforceberl@pa.gov>
Subject: [External] Fwd: Request for Water Service Application Submission - Taylor, Travis

ATTENTION: This email message is from an external sender. Do not open links or attachments from unknown senders. To report suspicious email, use the [Report Phishing button in Outlook](#).

[Quoted text hidden]

Travis Taylor <tjtaylo@gmail.com>

Thu, Sep 4, 2025 at 1:32 PM

To: "Force Berlanda, Karen" <kforceberl@pa.gov>

I called them but it went to their emergency after hours department and they said they couldn't help me, that I had to call back on Monday to speak to someone in the regular customer service department.

[Quoted text hidden]

Force Berlanda, Karen <kforceberl@pa.gov>

Thu, Sep 4, 2025 at 1:58 PM

To: Travis Taylor <tjtaylo@gmail.com>

Ok. And the Company did not require any form of payment to establish service, correct? They just needed to schedule an appointment?

[Quoted text hidden]

Request for Water Service Application Submission - 8/22/2025

Name: Travis Taylor

Effective: 08/22/25

Phone #: 4436059507

Email: tjtaylo@gmail.com

[View full Application for Water Service](#)

Travis Taylor <tjtaylo@gmail.com>
To: "Force Berlanda, Karen" <kforceberl@pa.gov>

Thu, Sep 4, 2025 at 1:58 PM

Correct
[Quoted text hidden]

Force Berlanda, Karen <kforceberl@pa.gov>

Thu, Sep 4, 2025 at 2:04 PM

To: Travis Taylor <tjtaylo@gmail.com>

Ok. We're reviewing the information. The company has 3 days to make a determination as to whether or not the customer is eligible for service or if a security deposit or downpayment is going to be required, but they appear to have determined that you were eligible and just needed to schedule an appointment.

[Quoted text hidden]

Travis Taylor <tjtaylo@gmail.com>

Fri, Sep 5, 2025 at 8:05 AM

To: "Force Berlanda, Karen" <kforceberl@pa.gov>

Can't say I agree with the decision to dismiss the case. The company clearly emailed me on the 22nd and advised there was no time available within 3 calendar days to turn the water back on.

This is out of the code specified on your website:

https://www.pacodeandbulletin.gov/Display/pacode?d=reduce&file=%2Fsecure%2Fpacode%2Fdata%2F052%2Fchapter56%2Fs56.191.html&utm_source=chatgpt.com

[Quoted text hidden]