

Mr. Michael D'Angelo, 343 Quiet Creek Drive, Gettysburg, PA 17325, (973) 519-1873

October 12, 2025

The Honorable Dave Sunday
Attorney General of the Commonwealth of Pennsylvania
16th Floor
Strawberry Square
Harrisburg, PA 17120

RE: Amblebrook Community, Gettysburg, Pennsylvania

Dear Attorney General Sunday,

Thank you for your service to our Commonwealth and for taking the time to read this letter. I am writing to bring to your attention certain aspects of The York Water Company relationship with the Amblebrook 55+ Community.

I am a resident of Amblebrook, a 55+ community located in Straban township. There are currently about 615 homes in Amblebrook that were constructed in two phases over the past 4-6 years. The community will grow to 2,000 homes over three upcoming phases that should be completed in roughly 5-7 years.

Amblebrook is self-contained from both fresh water and wastewater perspectives. Four fresh water wells have been drilled on the property; three are operational and the fourth will be brought online when needed without the need for additional capital investment. A wastewater treatment plant has been constructed on the property and is sized to accommodate the community at full capacity without the need for additional capital investment.

As such, the only capital investment needed for the remaining three phases will be fresh water and wastewater mains. In other words, the vast majority of capital investment needed to service Amblebrook's fresh and wastewater needs at scale have been accomplished. I should note that these facts were communicated by Mr. Joseph Hand and Mr. Matt Scarpato, President and Vice President of Operations of York Water, respectively, during a September 2025 tour of the Amblebrook facilities that they conducted with several Amblebrook residents.

I want to call your attention to York Water's potential non-compliance with an order of the Pennsylvania Public Utility Commission adopted September 17, 2020 (Docket No. A-2019-3014022) which granted York Water "approval of the right to: (1) acquire certain wastewater facilities from CCD Rock Creek LLC

(Rock Creek); and (2) begin to offer, render, furnish or supply wastewater service to the public in a portion of Straban Township, Adams County, Pennsylvania.”

Each home in Amblebrook is billed monthly for a variable wastewater component based upon usage plus a fixed monthly flat rate of \$86.90. During the abovementioned tour when pressed about York Water’s future intentions for the fixed wastewater component of Amblebrook residents’ monthly bills, Mr. Hand stated that he anticipated that Amblebrook residents would be charged the \$86.90 monthly flat rate in perpetuity regardless of the state of completion of the associated infrastructure. That translates to over \$641,000 annually in 2025 and over \$2,085,000 annually once the community is completed against a total projected total wastewater capital expenditure of \$10,808,495, as stated in the certificate application cited above.

My specific issue is with York Water’s potential non-compliance with Section V (Additional Capital Requirements) of the abovementioned order which states that “costs associated with the project will be funded by: York-WW’s internally generated funds; proceeds from the issuance of common stock under York-WW’s dividend reinvestment and direct stock purchase and employee stock purchase plans; and, if necessary, borrowings against York-WW’s lines of credit.” At best, York Water’s actions to date and stated future intentions violate the spirit of the cited certificate, and potentially, at worst, the letter of the order.

Shifting to rates show a similar picture. York Water has proposed (R-2025-3053442 and R-2025-3053573) a rate increase of 27.9% for the average residential repumped water customer and an increase of 36.6% for the average residential wastewater customer. These increases are close to 10 times greater than inflation rates in recent years and come on the heels of even greater rate increases just two years ago of approximately 19.5% for water and 45% for wastewater. For reference, inflation was 3.4% in 2023, 2.9% in 2024, and 2.3% in 2025. Even in 2021 and 2022 (when inflation was at a peak), the rates were 7% and 6.5%, respectively.

The proposed increases are not in line with water rate increases across the country:

- Water Finance and Management Report (<https://waterfm.com/report-u-s-water-sewer-bills-have-increased-24-in-five-years>) 2/17/2025 – reported that combined water and sewer bills for a typical US household increased 24% over the past five years, and 4.6% from 2023-2024.
- Water and Health Advisory Council (<https://wateradvisory.org/council/water-online-tariff-trends-utility-affordability-in-america>) 3/13/2024 – reported that water rates increased 25% and sewer rates increased 20% from 2017 to 2024. That report also indicated that, “In 2023 the average water utility in the United States charged \$44.77 for one month of service for a residential customer who used 6,200 gallons of water; the average residential sewer service price for the same volume was \$50.17.”

It is difficult to fathom why York Water is so unique that it must raise rates by such a such a margin, and why it must do so repeatedly. I am concerned that these rate increases are seen as standard practice by York Water.

Per a Quantitative Stock Report published by CFRA on October 10, 2025, York Water’s 2024 financial performance exceeded that of a peer group of 10 privately held regional water companies on several measures. % Operating Margin was 38.1 for York and 5.2 for the peer group. % Net Margin was 25.8

for York and -6.8 for the peer group. % Return On Capital was 4.1 for York and 2.5 for the peer group. Finally, % Cash Flow to Sales was 40.8 for York and 0.5 for the peer group. York Water is clearly in excellent financial health and earning an attractive rate of return on capital.

As such, I fail to comprehend how York Water's proposed rate increases and intentions for future wastewater rates meet a standard of justifiable and fair by any definition. Please note that those measures will significantly improve as the fixed wastewater monthly charge is collected for new Amblebrook homes without the need for a corresponding large capital expenditure. Management and shareholders are being handsomely rewarded while Amblebrook residents on fixed incomes foot the bill.

Privatization of basic services such as fresh water and wastewater is an invitation to price gouging as evidenced by York Water's current and proposed treatment of its Amblebrook customers. On behalf of myself and my fellow Amblebrook residents, thank you for your attention to this matter.

A Concerned Citizen,

A handwritten signature in black ink that reads "Michael D'Angelo". The signature is written in a cursive, flowing style.

Michael D'Angelo

CC: Governor Josh Shapiro, Commonwealth of Pennsylvania

Mr. Stephen M. DeFrank, Chairman Pennsylvania Public Utility Commission

Justice John Coogan, Administrative Law Judge, Pennsylvania Public Utility Commission

Mr. Joseph T. Hand, President and Chief Executive Officer York Water Company

Mr. William H. Crown, Chief Executive Officer and President Henry Crown and Company