

---

Devin Ryan

dryan@postschell.com  
717-612-6052 Direct  
717-731-1985 Direct Fax  
File #: 210634

November 10, 2025

***VIA ELECTRONIC FILING***

Matthew Homsher, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street, 2nd Floor North  
P.O. Box 3265  
Harrisburg, PA 17105-3265

**Re: PA Public Utility Commission, *et al.* v. The York Water Company - Water Division  
Docket Nos. R-2025-3053442, *et al.***

**PA Public Utility Commission, *et al.* v. The York Water Company - Wastewater  
Division  
Docket Nos. R-2025-3053573, *et al.***

---

Dear Secretary Homsher:

Enclosed for filing is The York Water Company's Reply Brief in the above-referenced proceeding.

Copies of this filing are being served as indicated on the Certificate of Service.

Respectfully submitted,

  
Devin Ryan

DR/bfc  
Enclosures

cc: The Honorable John M. Coogan (*via email; w/attachment*)  
The Honorable Emily A. Farren (*via email; w/attachment*)  
Certificate of Service

## CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been served upon the following persons, in the manner indicated, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

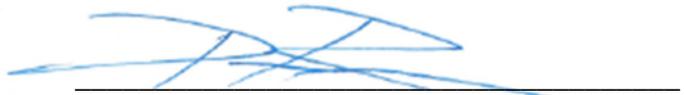
### VIA E-MAIL

Carrie Wright, Esquire  
Bureau of Investigation & Enforcement  
Commonwealth Keystone Building  
400 North Street, 2nd Floor West  
PO Box 3265  
Harrisburg, PA 17105-3265  
[carwright@pa.gov](mailto:carwright@pa.gov)

Jacob D. Guthrie, Esquire  
Ryan Morden, Esquire  
Katherine M. Kennedy, Esquire  
Office of Consumer Advocate  
555 Walnut Street, Forum Place, 5<sup>th</sup> Floor  
Harrisburg, PA 17101-1923  
[JGuthrie@paoca.org](mailto:JGuthrie@paoca.org)  
[rmorden@paoca.org](mailto:rmorden@paoca.org)  
[KKennedy@paoca.org](mailto:KKennedy@paoca.org)  
[OCAYork2025@paoca.org](mailto:OCAYork2025@paoca.org)

Steven C. Gray, Esquire  
Rebecca Lyttle, Esquire  
Office of Small Business Advocate  
555 Walnut Street  
Forum Building, 1<sup>st</sup> Floor  
Harrisburg, PA 17101  
[sgray@pa.gov](mailto:sgray@pa.gov)  
[relyttle@pa.gov](mailto:relyttle@pa.gov)

Date: November 10, 2025



Devin T. Ryan

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission : Docket Nos. R-2025-3053442  
Office of Consumer Advocate : C-2025-3055746  
Office of Small Business Advocate : C-2025-3055824

v.

The York Water Company – Water Division

Pennsylvania Public Utility Commission : Docket Nos. R-2025-3053573  
Office of Consumer Advocate : C-2025-3055747  
Office of Small Business Advocate : C-2025-3055827

v.

The York Water Company – Wastewater  
Division

---

**REPLY BRIEF OF  
THE YORK WATER COMPANY**

---

Michael W. Hassell (ID # 34851)  
Post & Schell, P.C.  
17 North Second Street  
12<sup>th</sup> Floor  
Harrisburg, PA 17101-1601  
Phone: 717-731-1970  
Fax: 717-731-1985  
E-mail: mhassell@postschell.com

Devin T. Ryan (ID # 316602)  
Alice A. Wade (ID # 335228)  
Post & Schell, P.C.  
One Oxford Centre  
301 Grant Street, Suite 3010  
Pittsburgh, PA 15219  
Phone: 717-612-6052  
Fax: 717-731-1985  
E-mail: dryan@postschell.com  
E-mail: alice.wade@postschell.com

Dated: November 10, 2025

*Counsel for The York Water Company*

**TABLE OF CONTENTS**

I. INTRODUCTION ..... 1

    A. DESCRIPTION OF YORK WATER..... 2

    B. PROCEDURAL HISTORY..... 2

    C. LEGAL STANDARDS ..... 3

II. SUMMARY OF ARGUMENT ..... 3

III. ARGUMENT..... 4

    A. OVERALL POSITION ON RATE INCREASE..... 4

    B. REVENUE ALLOCATION ..... 4

        1. Introduction..... 4

        2. Water Class Cost of Service Study ..... 4

        3. Revenue Allocation..... 5

            a. The Commission Should Adopt York Water’s Well-Established Water Revenue Allocation Instead of OCA’s Flawed Proposal that Is Based on the Alternative Approach under the AWWA M1 Manual ..... 5

            b. The Commission Should Utilize York Water’s Scale Back Methodology for the Increase in Water Rates ..... 10

IV. CONCLUSION..... 12

**TABLE OF AUTHORITIES**

**Page(s)**

**Pennsylvania Administrative Agency Decisions**

*Pa. PUC v. Columbia Water Co.*,  
2024 Pa. PUC LEXIS 23 (Order entered Jan. 18, 2024) .....7

**Pennsylvania Statutes**

66 Pa. C.S. § 1311(c) .....1

**Pennsylvania Codes and Regulations**

52 Pa. Code § 53.52 .....1

52 Pa. Code § 53.53 .....1

**Other Authorities**

*In re Petition of Bloomington, Ind., for Approval of a New Schedule of Rates and  
Charges for Water Utility Service and for Authority to Issue and Approval of  
Bonds, Notes, or Other Obligations*,  
2021 Ind. PUC LEXIS 298 (Dec. 22, 2021).....9

## **I. INTRODUCTION**

On May 30, 2025, York Water filed with the Commission Supplement No. 165 to its Tariff Water – Pa. P.U.C. No. 14 (“Supplement No. 165”) and Supplement No. 26 to Tariff Wastewater – Pa. P.U.C. No. 1 (“Supplement No. 26”), along with supporting information required by 52 Pa. Code §§ 53.52 and 53.53, to become effective August 1, 2025. In Supplement No. 165, York Water proposed a general increase in water rates of \$20,311,978 per year, and in Supplement No. 26, York Water proposed a general increase in wastewater rates of \$3,857,507 per year. By Order entered February 10, 2017, at Docket No. P-2017-2582839, York Water was granted permission to file a single case that combined water and wastewater revenue requirements. York Water did not propose to allocate a portion of the wastewater revenue requirement to water customers pursuant to 66 Pa. C.S. § 1311(c).

York Water, the Pennsylvania Public Utility Commission’s (“Commission”) Bureau of Investigation and Enforcement (“I&E”), the Office of Consumer Advocate (“OCA”), and the Office of Small Business Advocate (“OSBA”), who are the only active parties in the proceeding, successfully reached a settlement of all but one of the issues in the case. The terms of that partial settlement are set forth in the Joint Petition for Approval of Partial Settlement (“Partial Settlement”) that was filed on October 29, 2025, along with Statements in Support from each of the active parties. The Partial Settlement provides for increases in rates designed to produce a total increase in annual base-rate operating revenues of \$18,850,000, which consists of an increase in base rate water revenues of \$16,000,000, and an increase in base rate wastewater revenues of \$2,850,000. The sole issue reserved for litigation is water revenue allocation among customer classes.

On October 29, 2025, Main Briefs were filed by York Water, I&E, OCA, and OSBA on the issue reserved for litigation. As explained in York Water’s Main Brief, the Company’s water

revenue allocation, as supported by York Water’s Allocated Cost of Service Study (“COSS”), should be adopted and utilized by the Commission to support York Water’s design of rates, with the exception of the fixed residential 5/8” customer charge of \$19.75 resolved by the Partial Settlement,<sup>1</sup> to recover the agreed-upon \$16,000,000 increase in base rate water revenues.

York Water respectfully submits this Reply Brief, which is focused on responding to any arguments or issues raised in the other parties’ Main Briefs that were not previously addressed by the Company. As set forth in more detail below, the Commission should reject OCA’s arguments regarding the Company’s COSS and in support of OCA’s flawed alternative cost of service study and, instead, adopt the well-reasoned and well-supported positions of York Water and OSBA. Furthermore, the Commission should direct the Company to submit a design of water rates consistent with York Water’s positions in its briefs.

**A. DESCRIPTION OF YORK WATER**

York Water incorporates herein by reference Section I.A of its Main Brief.

**B. PROCEDURAL HISTORY**

York Water incorporates herein by reference Section I.B of its Main Brief. As a supplement that procedural history, York Waters notes the following:

On October 29, 2025, York Water, I&E, OCA, and OSBA separately filed their Main Briefs on the issue reserved for litigation. Also, York Water, I&E, OCA, and OSBA jointly filed the Partial Settlement.

On or about November 3, 2025, Edward Madalis filed an Objection to the Partial Settlement.

---

<sup>1</sup> The 5/8” meter is the predominant meter serving residential customers.

## **C. LEGAL STANDARDS**

York Water incorporates herein by reference Section I.C of its Main Brief.

## **II. SUMMARY OF ARGUMENT**

Nothing in OCA's Main Brief warrants rejecting York Water's well-founded COSS and water revenue allocation. Consistent with prior York Water base rate proceedings, the Company's water revenue allocation is based on actual measured data from a class customer demand study conducted in the 1970's. Instead of York Water's demand study, OCA advocates for the AWWA M1 Manual's alternative approach that uses monthly billing data by class compared to overall system peaks.

OCA overlooks, however, that its own witness testified in another proceeding that the AWWA M1 Manual's alternative approach is used when there is no demand study. Here, even if the Company's demand study could benefit from an update, it nonetheless remains a viable demand study. In fact, York Water's expert witness, Gregory R. Herbert, testified that his firm prepared a comprehensive class demand study for Pennsylvania-American Water Company ("PAWC") for the 2013-2015 period and submitted it as part of PAWC's 2017 rate case. That study, which covered the whole Commonwealth including southcentral Pennsylvania, produced demand factors that better match York Water's demand factors than the ones proffered by OCA in this case. Thus, as both York Water and OSBA have argued in this case, York Water's COSS and water revenue allocation should be utilized instead of OCA's proposal.

Also, for the first time in its Main Brief, OCA expressly supports York Water conducting an updated demand study, something that the Company has examined the feasibility of doing multiple times after past base rate cases and received zero response from the OCA. Rather than ignoring York Water's demand study and relying on OCA's stopgap, alternative approach, the ALJs and Commission should opt for consistency and utilize York Water's COSS and water

revenue allocation, particularly when OCA's proposal would result in a significant shift in costs from the Residential customer class to the other four customer classes.

Lastly, in I&E's Main Brief, I&E focused on how the proposed water rates should be scaled back should the Commission approve water revenue increase under the Partial Settlement. York Water agrees with I&E that the rates should be proportionately scaled back and that the West Donegal and Salisbury Township rates should be adjusted to move towards consolidation. Moreover, under Paragraph 46 of the Partial Settlement, the residential 5/8" by 3/4" customer charge is not subject to scale back. As for the other fixed customer charges, the Company maintains that they should not be scaled back if the approved revenue increase is sufficient to permit a modest reduction in volumetric rates while still enabling the scaled back revenues to be proportionally aligned with the cost of service by customer class.

For these reasons, and as further explained herein and in York Water's Main Brief, the ALJs and Commission should adopt York Water's proposed water revenue allocation and reject the arguments and recommendations raised in opposition when determining how the agreed-upon \$16.0 million increase in water revenues should be allocated among the Company's rate classes.

### **III. ARGUMENT**

#### **A. OVERALL POSITION ON RATE INCREASE**

York Water incorporates herein by reference Section III.A of its Main Brief.

#### **B. REVENUE ALLOCATION**

##### **1. Introduction**

York Water incorporates herein by reference Section III.B.1 of its Main Brief.

##### **2. Water Class Cost of Service Study**

As noted in York Water's Main Brief, York Water retained Gannett Fleming Valuation and Rate Consultants, LLC ("Gannett Fleming") to prepare a Water COSS to allocate among the

water customer classes the entire revenue requirement of the Company's water operations.<sup>2</sup> Foundational to the Water COSS was the use of the base-extra capacity method, which is a recognized method that allocates the cost of providing water service to customer classifications in proportion to the classification's use of commodity, facilities, and services. No parties disputed the Company's use of the base-extra capacity method for purposes of its Water COSS. In fact, in their Main Briefs, the other parties either agreed with or did not dispute the use of a base-extra capacity method.<sup>3</sup> Indeed, OCA explains that it "does not take issue with the base-extra method that York [Water] used to develop its COSS and noted that it is acceptable by industry standards."<sup>4</sup>

### **3. Revenue Allocation**

#### **a. The Commission Should Adopt York Water's Well-Established Water Revenue Allocation Instead of OCA's Flawed Proposal that Is Based on the Alternative Approach under the AWWA M1 Manual**

Although none of the parties dispute the use of the base-extra capacity method for developing the Water COSS, OCA has contested "the data inputs the Company used" on the grounds that they allegedly "need to be modified/updated in order to fairly allocate the Company's revenue to its customer classes."<sup>5</sup> According to OCA, the Commission should utilize OCA's alternative COSS that was developed using the "widely accepted methodology in the AWWA Manual – including by York Water's own witness in a recent case – to estimate class-specific maximum day and maximum hour demand factors."<sup>6</sup> OCA also asserts that "York Water's COSS and resulting revenue allocation proposal deviate from this ratemaking norm" of cost causation "and, therefore, should be given little weight."<sup>7</sup> Moreover, in addition to advocating for its

---

<sup>2</sup> See York Water St. No. 107 at 3-4; York Water Exhibit No. FVIII.

<sup>3</sup> See I&E MB at 5-6; OCA MB at 14; OSBA MB at 4.

<sup>4</sup> OCA MB at 14.

<sup>5</sup> *Id.*

<sup>6</sup> *Id.* at 22.

<sup>7</sup> *Id.* at 12-13.

alternative COSS and revenue allocation proposal, OCA states in its Main Brief that “OCA supports York Water conducting an updated demand study to more accurately reflect system demands for future rate proceedings, particularly in light of York Water’s ongoing acquisitions.”<sup>8</sup> Further, while OSBA opposes OCA’s alternative COSS and revenue allocation, OSBA contends that “a fully updated and recent demand study is necessary for preserving the accuracy of a base-extra capacity methodology COSS, as well as the resulting customer class revenue allocation.”<sup>9</sup> Therefore, OSBA recommends that York Water “prepare a current demand study.”<sup>10</sup>

The ALJs and Commission should reject OCA’s arguments. In its Main Brief, York Water explained at length why its proposed water revenue allocation should be utilized and responded to OCA’s arguments in opposition by pointing out, among other things, that an updated demand study has not been performed due to other parties failing to respond to the Company’s feasibility studies about conducting such an updated demand study.<sup>11</sup> The Company also responded to OSBA’s recommendation that York Water conduct an updated demand study,<sup>12</sup> and York Water will not repeat those arguments here.

However, York Waters observes that OCA’s Main Brief is the first time in this proceeding when OCA expressly stated its support for the Company conducting an updated demand study. At no point in OCA witness Mierzwa’s direct or surrebuttal testimony did he recommend that York Water conduct an updated demand study, in keeping with OCA’s failure to respond to York Water’s feasibility studies in years past.<sup>13</sup> Instead, Mr. Mierzwa criticized the Company for having an allegedly outdated demand study and suggested using the alternative approach in Appendix A

---

<sup>8</sup> OCA MB at 28.

<sup>9</sup> OSBA MB at 5.

<sup>10</sup> *Id.* at 6.

<sup>11</sup> *See* York Water MB at 16-22.

<sup>12</sup> *See id.* at 19-20, 22.

<sup>13</sup> *See* OCA St. 4 at 1-24; OCA St. 4SR at 1-11; York Water MB at 20.

of the AWWA M1 Manual.<sup>14</sup> Accordingly, when OCA states that it “supports York Water conducting an updated demand study” in its Main Brief, OCA does not cite any portion of the evidentiary record where it stated that position because no such record evidence exists.<sup>15</sup> The record does reflect, however, that York Water has long been willing to conduct an updated demand study so long as the other parties were in agreement with the scope and cost of doing so and with York Water being assured cost recovery.<sup>16</sup>

In addition, even assuming *arguendo* that York Water’s demand study could benefit from an update, that does not mean York Water’s revenue allocation proposal departs from the “ratemaking norm” of cost causation by relying on that demand study, as alleged by OCA.<sup>17</sup> One of the two fundamental principles for revenue allocation is “consistency,” meaning that once a reasonable cost allocation method is established, it should not be changed without a compelling reason.<sup>18</sup> As OSBA aptly observes, York Water’s Water COSS “has been tested and previously litigated” and “should not be discarded for untested model changes that have been subject to limited scrutiny.”<sup>19</sup> Indeed, OCA’s proposed revenue allocation would result in a dramatic shift in costs from the Residential class to the other four customer classes, as shown in the following table<sup>20</sup>:

---

<sup>14</sup> See OCA St. 4 at 10-12; OCA St. 4SR at 2-6.

<sup>15</sup> OCA MB at 28.

<sup>16</sup> See York Water MB at 19-20.

<sup>17</sup> OCA MB at 12-14.

<sup>18</sup> *Pa. PUC v. Columbia Water Co.*, 2024 Pa. PUC LEXIS 23, at \*74, 76 (Order entered Jan. 18, 2024).

<sup>19</sup> OSBA MB at 6.

<sup>20</sup> York Water notes that OCA’s table on page 27 of its Main Brief purporting to show the “OCA Proposed Distribution of Water Revenue Increase for the As-Filed Rate Increase Request” does not incorporate the minor corrections to the present rate revenue numbers set forth in York Water Exhibit FVIII-R and described on page 3 of York Water Statement No. 107-R. For the sake of comparison, the Company’s as-filed revenue allocation numbers, which do not incorporate those minor corrections, are provided in this table.

<b>Class</b>	<b>York Water Revenue Allocation of As-Filed Water Rate Increase<sup>21</sup></b>	<b>OCA Revenue Allocation of As-Filed Water Rate Increase<sup>22</sup></b>	<b>Difference</b>
<b>Residential</b>	\$12,856,840	\$11,169,840	<i>\$1,687,000 Decrease</i>
<b>Commercial</b>	\$4,957,391	\$5,832,391	<b>\$875,000 Increase</b>
<b>Industrial</b>	\$1,817,117	\$2,342,117	<b>\$525,000 Increase</b>
<b>Private Fire</b>	\$425,007	\$605,007	<b>\$180,000 Increase</b>
<b>Public Fire</b>	\$209,932	\$316,933	<b>\$107,001 Increase</b>
<b>Total</b>	\$20,266,287	\$20,266,287	None

Furthermore, York Water witness Herbert testified that for “a period of three years, 2013 – 2015,” his firm “conducted a comprehensive class demand study for Pennsylvania-American Water Company (‘PAWC’) covering the entire state including south central Pennsylvania and submitted the results in [PAWC’s] 2017 rate case.”<sup>23</sup> Mr. Herbert compared the maximum day and maximum hour extra demand factors from that study to York Water’s factors in this case and OCA’s factors from the Company’s 2022 and 2025 bases rate cases.<sup>24</sup> Ultimately, Mr. Herbert concluded that “the results of the PAWC study track much more closely with the ratios [he] used for York Water than Mr. Mierzwa’s various ratios from his AWWA analyses,” as summarized in the following table from pages 8-9 of his rebuttal testimony:

---

<sup>21</sup> See York Water Exhibit No. FVIII; see also note 20, *supra*.

<sup>22</sup> See OCA St. 4 at 17; see also note 20, *supra*.

<sup>23</sup> York Water St. No. 107-R at 8.

<sup>24</sup> See *id.* at 8-9.

Comparison of Customer Demand Factors								
Class	Maximum Day				Maximum Hour			
	OCA 2022	OCA 2025	York Water	PAWC	OCA 2022	OCA 2025	York Water	PAWC
<b>Residential</b>	1.70	1.85	2.50	2.00	2.80	3.10	4.50	5.00
<b>Commercial</b>	1.50	1.65	1.60	2.10	2.50	2.70	3.30	4.60
<b>Industrial</b>	1.45	1.70	1.50	1.50	1.95	2.25	2.70	1.70

Finally, while OCA points to York Water’s witness using the AWWA M1 Manual’s alternative approach in a rate case for Veolia Water Rhode Island, Inc., OCA omits how the Company’s witness explained that he was forced to use that approach because there was no demand study.<sup>25</sup> At the same time, OCA overlooks how its own witness, Mr. Mierzwa, testified in a recent case that the AWWA M1 Manual’s alternative approach is used when no demand study is available.<sup>26</sup> Specifically, the Indiana Utility Regulatory Commission observed the following in its *Bloomington* decision in 2021:

In response to Ms. York’s testimony regarding Petitioner’s weekly usage adjustments, Mr. Mierzwa stated that in the absence of a formal demand study, which Bloomington has not done, using the AWWA Manual M1 methodology to calculate extra-capacity factors is commonly used in water cost of service studies.<sup>27</sup>

In contrast to *Bloomington*, York Water has completed a formal demand study. Therefore, the “ratemaking norm” is to be consistent and rely on York Water’s demand study and well-established revenue allocation, especially when OCA’s approach would merely be a stopgap

---

<sup>25</sup> See OCA MB at 22; see also York Water MB at 19.  
<sup>26</sup> See *In re Petition of Bloomington, Ind., for Approval of a New Schedule of Rates and Charges for Water Utility Service and for Authority to Issue and Approval of Bonds, Notes, or Other Obligations*, 2021 Ind. PUC LEXIS 298, at \*20 (Dec. 22, 2021) (“*Bloomington*”).  
<sup>27</sup> *Id.* (emphasis added).

measure until York Water completes an updated demand study as now recommended by both OCA and OSBA in their Main Briefs.<sup>28</sup>

**b. The Commission Should Utilize York Water’s Scale Back Methodology for the Increase in Water Rates**

In its Main Brief, I&E only addresses how the water rates should be scaled back if the Commission were to approve the Partial Settlement, under which the Company’s annual water revenues would increase by \$16.0 million.<sup>29</sup> Because the Partial Settlement provides that the residential 5/8” by 3/4” customer charge of \$19.75 per month will not be subject to scale back, I&E avers that it “files this brief in support of the balance of its recommendation that the remaining customer charges and revenue allocations be scaled back proportionately based on the increase agreed to in settlement and the allocated cost of service study agreed to by the Commission.”<sup>30</sup>

York Water generally agrees with I&E. As York Water witness Herbert testified, he “agree[s] that the scale back should be proportional to the cost of service study that is ultimately accepted by the Commission in this case.”<sup>31</sup> However, “if the approved increase is sufficient to permit a modest reduction in volumetric rates while still enabling the scaled back revenues to be proportionally aligned with the cost of service by customer class—without requiring a decrease in customer charges—then [Mr. Herbert] recommend[s] the customer charges should remain unchanged.”<sup>32</sup> After I&E questioned in surrebuttal what would be considered a “modest reduction in volumetric rates” that would trigger the customer charges to be scaled back,<sup>33</sup> Mr. Herbert provided clarification in rejoinder:

If volumetric rates were to decrease 10% or less in order to maintain the customer charges at the proposed levels, I propose not to scale

---

<sup>28</sup> See OCA MB at 28; OSBA MB at 6.

<sup>29</sup> See I&E MB at 6; Partial Settlement ¶ 34.

<sup>30</sup> I&E MB at 6.

<sup>31</sup> York Water St. No. 107-RJ at 3.

<sup>32</sup> York Water St. No. 107-R at 4.

<sup>33</sup> See I&E St. No. 3-SR at 7.

back the customer charges in a scale back scenario. If the reduction to volumetric rates becomes greater than 10% in a scale back scenario in order to maintain the proposed customer charges, then I agree a scale back to the customer charges is warranted.<sup>34</sup>

Additionally, as part of the scale back, I&E witness Cline proposed adjusting the West Donegal and Salisbury Township rates so that they continue to move towards consolidation.<sup>35</sup> York Water has no objection to adjusting these rates if such adjustment moves them toward consolidation.<sup>36</sup> Thus, the Company's proposed water rates should be scaled back consistent with these principles.

For these reasons, and as further explained in York Water's Main Brief, the Company's proposed water revenue allocation is founded upon well-established principles and data. Therefore, the Commission should reject OCA's proposed alternative water revenue allocation, adopt the Company's water revenue allocation, and direct the Company to submit a design of water rates consistent with York Water's positions in its briefs.

---

<sup>34</sup> York Water St. No. 107-RJ at 2.

<sup>35</sup> See I&E St. No. 3-SR at 8-9.

<sup>36</sup> York Water St. No. 107-RJ at 3.

**IV. CONCLUSION**

WHEREFORE, The York Water Company respectfully requests that Administrative Law Judges John M. Coogan and Emily A. Farren and the Pennsylvania Public Utility Commission adopt and utilize the Company's water revenue allocation proposal to support York Water's design of water rates, with the exception of the fixed residential customer charge of \$19.75 resolved by the Joint Petition for Approval of Partial Settlement, to recover the agreed-upon \$16,000,000 increase in base rate water revenues.

Respectfully submitted,



Michael W. Hassell (ID # 34851)  
Post & Schell, P.C.  
17 North Second Street  
12<sup>th</sup> Floor  
Harrisburg, PA 17101-1601  
Phone: 717-731-1970  
Fax: 717-731-1985  
E-mail: mhassell@postschell.com

Devin T. Ryan (ID # 316602)  
Alice A. Wade (ID # 335228)  
Post & Schell, P.C.  
One Oxford Centre  
301 Grant Street, Suite 3010  
Pittsburgh, PA 15219  
Phone: 717-612-6052  
Fax: 717-731-1985  
E-mail: dryan@postschell.com  
E-mail: alice.wade@postschell.com

Date: November 10, 2025

*Counsel for The York Water Company*