

COMMONWEALTH OF PENNSYLVANIA



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November 17, 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.  
City of Lancaster – Bureau of Water  
Docket No. R-2025-3057237

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/ Josiah B. Harmar  
Josiah B. Harmar, Esq.  
Assistant Consumer Advocate  
PA Attorney I.D. # 338426  
Email: JHarmar@paoca.org

Enclosures

cc: Administrative Law Judge Erin Gannon (Via Email Only: egannon@pa.gov)  
Certificate of Service

CERTIFICATE OF SERVICE

Pennsylvania Public Utility Commission :  
 :  
 v. : Docket No. R-2025-3057237  
 :  
 City of Lancaster – Bureau of Water :  
 :

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 17th day of November 2025.

SERVICE BY E-MAIL ONLY

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Dated: November 17, 2025

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Pennsylvania Public Utility Commission	:		
	:	Docket Nos.	R-2025-3057237
v.	:		C-2025-3057935
	:		C-2025-3057993
City of Lancaster – Bureau of Water	:		C-2025-3058103

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PREHEARING CONFERENCE MEMORANDUM  
OF THE  
OFFICE OF CONSUMER ADVOCATE

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Pursuant to the Prehearing Conference Order issued on November 6, 2025, in the above-captioned proceeding, by the Honorable Administrative Law Judge (ALJ) Erin L. Gannon, 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 September 30, 2025, City of Lancaster – Bureau of Water (Lancaster or City) filed Proposed Supplement No. 49 to Tariff Water – Pa. P.U.C. No. 6 with the Commission. The City proposes to increase rates to produce additional overall revenues of \$7 million per year, a 20.1% increase in overall distribution revenue requirement.

Lancaster provides water distribution service to approximately 16,865 residential, commercial, and industrial customers within the City of Lancaster, and to 31,624 residential,

commercial, and industrial customers outside the City of Lancaster in Lancaster Township, Manheim Township, Millersville Borough, West Lampeter Township, Pequea and portions of Manor, West Hempfield and East Hempfield Townships, and East Lampeter Pennsylvania.

Under the City's proposal, the total bill for a residential customer purchasing 4,500 gallons per month using a 5/8" meter would increase by \$8.79 from \$29.53 to \$38.32, or by approximately 29.8%. The City proposes increasing the monthly residential customer charge for a 5/8" meter from \$7.95 to \$11.62, or by 46% and for a 3/4" meter from \$9.30 to \$13.59, or by 46%. The City proposes a return on equity of 10.9%, resulting in an overall rate of return of 7.75% in conjunction with an imputed capital structure of 53% equity and 47% debt.

On October 10, 2025, the Commission's Bureau of Investigation & Enforcement (I&E) filed a Notice of Appearance. On October 10, 2025, the Office of Small Business Advocate (OSBA) filed a Complaint. On October 23, 2025, James M. Blevins filed a complaint on his own behalf.

On October 15, 2025, the OCA filed a Formal Complaint, Public Statement, and Notice of Appearance in this proceeding to protect the interests of consumers in the City's service territory and to ensure that the City is permitted to implement only a level of rates that is just and reasonable and in accordance with sound ratemaking principles.

On November 6, 2025, the Commission issued an Order that initiated an investigation into the lawfulness, justness, and reasonableness of the proposed rate increase in this filing in addition to the City'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 June 29, 2026. Also on November 6, ALJ Gannon issued a Prehearing Conference Order setting Tuesday, November 18, 2025, as the date of the prehearing conference.

## **II. ISSUES**

Based upon a preliminary analysis of the City's general rate increase filing, the OCA has compiled a list of issues and sub-issues which it anticipates will be included in its investigation of the City's rate request. The OCA anticipates that other issues may arise and may pursue them once the OCA has received and analyzed the answers to all its interrogatories. The OCA will analyze and present the issues and sub-issues set forth below, and others that may develop during discovery, 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 City as well as the overall rate of return as claimed by the City. Also, the OCA will carefully examine the City'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 City 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 City to determine whether it is reasonable and appropriate for ratemaking purposes.

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

### **B. Rate Base/ Measure of Value**

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

2. The OCA will review the City's claim for plant additions during the FTY and FPFTY.

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

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

6. The OCA will examine the City's claim for materials and supplies.
7. The OCA will examine the City's calculation and amount of cash working capital.
8. The OCA will examine the City's Accumulated Deferred Income Tax (ADIT) balances and excess ADIT balances.
9. The OCA will examine the reasonableness of the City'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 City's claimed revenues and any adjustments to the level of revenues.
2. The OCA will seek to ascertain whether the City'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 City's claims of sales and revenues during the FTY and FPFTY are reasonable and accurate.
5. The OCA will examine whether the City'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 City'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 City's employees or contributions to pension funds.
8. The OCA will examine the justness and reasonableness of the City's employee healthcare expense.
9. The OCA will examine the appropriateness of the City's pro forma claim for rate case expense.
10. The OCA will examine the reasonableness of the City's proposed purchased power expense claims.
11. The OCA will examine the City's request for depreciation expenses to determine whether it is just and reasonable.
12. The OCA will examine the justness and reasonableness of the City's claim for insurance costs.

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

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

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

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

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

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

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

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

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

2. The OCA will examine the City'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 City's proposed tariff changes, including all proposed surcharges.

4. The OCA will examine all other cost allocation and rate design proposals, including whether customers outside of the City are disproportionately charged system costs compared to customers inside the City.

**F. Depreciation**

1. The OCA will examine the City'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 City operations, practices, procedures and outreach related to serving low-income customers.
2. The OCA will assess the impact of the City's proposed rate increase on universal service, including the overall costs of customer assistance programs as affected by the City's rate design.
3. The OCA will examine how the City's proposed rate increase, rate structure and proposed new alternative ratemaking and new surcharges will affect low-income and/or low-usage customers.
4. The OCA will review the City's current bill discount programs, arrearage management programs, or lack thereof, and proposed changes to the programs.
5. The OCA will review the City's affordability analysis.

## **H. Quality of Service**

1. The OCA will review the City'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 City's customers.

## **I. Customer Service**

1. The OCA will review the City'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 City's customer service, including performance trends, internal training, management oversight, policies, and programs.
3. The OCA will examine the City'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 City's compliance and reporting as required in the last rate case concerning service and service quality.
5. The OCA will examine the City'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 City's operations.

2. The OCA will examine the City's compliance with the Pennsylvania Department of Environmental Protection related to PFAS regulations.

3. The OCA will investigate to ensure that the City is complying with all prior orders.

4. The OCA reserves the right to examine other issues affecting the City'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

Lafayette K. Morgan Jr.  
10480 Little Patuxent Parkway  
Suite 300  
Columbia, MD 21044  
OCALancaster2025@paoca.org

Cost of Service / Rate Structure/ Rate Design

Jerome D. Mierzwa  
10480 Little Patuxent Parkway  
Suite 300  
Columbia, MD 21044  
OCALancaster2025@paoca.org

Rate of Return / Cost of Capital /  
Capital Structure / Depreciation

David J. Garrett  
5000 Carrington Place  
Oklahoma City, OK 73131  
OCALancaster2025@paoca.org

Customer Service / Tariff / Quality of Service

LeeAnn Wise  
555 Walnut Street  
Fifth Floor, Forum Place  
Harrisburg, PA, 17101  
OCALancaster2025@paoca.org

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 it requires additional witnesses for any portion of its case, it will notify all parties of record immediately.

**IV. PROPOSED SCHEDULE**

The OCA continues to work with the City 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 December 16, 2025
Other Parties’ Direct Testimony	Wednesday, December 17, 2025
Other Parties’ Supplemental Direct Testimony Regarding Public Input Hearings	Tuesday, December 23, 2025
Rebuttal Testimony (all parties and all issues)	Thursday, January 8, 2026
Surrebuttal Testimony (all parties and all issues)	Tuesday, January 20, 2026
Written Rejoinder Outline (by noon)	Friday, January 23 (or 26), 2026 (by noon)
Evidentiary Hearings	Tuesday, January 27, 2026 through Wednesday January 28, 2026
Main Briefs	Thursday, February 26, 2026
Reply Briefs	Tuesday, March 17, 2026

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 Officer 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.

Harrison W. Breitman, Esq., Assistant Consumer Advocate  
Ryan R. Morden, Esq., Assistant Consumer Advocate  
Josiah B. Harmar, Esq., Assistant Consumer Advocate  
555 Walnut Street, 5<sup>th</sup> Floor, Forum Place  
Harrisburg, PA 17101-1923  
Phone: (717) 783-5048  
E-Mail: OCALancaster2025@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.

The OCA also requests that the ALJ instruct the parties on the record as to whether consumers who have filed formal rate complaints in this proceeding should be included on the official service lists if those complainants have not indicated either at the prehearing conference, or prior to the prehearing conference, that they wish to be active parties to this proceeding.

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

## **VI. SETTLEMENT**

The OCA will participate in settlement discussions in this matter.

## **VII. 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 Officer direct that the modifications will take effect when addressed on the record during the prehearing conference and apply to all future discovery requests served on and after the date of the prehearing conference, Tuesday, November 18, 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.

### VIII. PREHEARING PROCEDURES

At the Prehearing Conference, the OCA requests an on-the-record discussion regarding font size requirements and page limitations for briefing.

The OCA requests that the ALJ in the 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 ALJ 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 ALJ 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 ALJ:

- 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.

## **IX. PUBLIC INPUT HEARINGS**

The OCA will be prepared to discuss public input hearings at the prehearing conference. Given the magnitude of the requested rate increase, 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 four public input hearings be held, two in-person and two telephonic, for the City'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 ALJ).

The OCA specifically requests the following for public input hearings:

- 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, such as cross examination exhibits and a list of evidence to be moved into the record (i.e., a party's list of pre-served testimony and exhibits), be required to be submitted to the ALJ 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. The City 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 City 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.

I. In addition to the City publishing the notice in a newspaper of general circulation for its service territories, the OCA respectfully requests that the City post notice of the public input hearings on all of their social media platforms at least twice per week during each week prior to the scheduled dates of the public input hearings.

J. The City be directed to send notice of the public input hearings via a bill insert during a billing cycle to occur shortly after this prehearing conference and prior to the scheduled dates of the public input hearings.

## **X. COMMON BRIEFING OUTLINE**

The OCA requests that, when the ALJ issues Instructions for Briefs, the common outline provided by the ALJ 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's proposals for the common briefing outline are attached as Appendix B to this Prehearing Memorandum.

Respectfully submitted,

/s/ Josiah Harmar  
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(717) 783-5048

DATED: 11/17/2025

OCA APPENDIX A

NOTICE OF IN-PERSON AND TELEPHONIC PUBLIC INPUT HEARINGS

For the City of Lancaster Rate Increase Request

Docket No.  
R-2025-3057237

The Pennsylvania Public Utility Commission (PUC) will conduct four (4) Public Input Hearings concerning the general rate increase requests filed by the City of Lancaster on September 30, 2025, seeking to increase water distribution rates by \$7 million per year. The in-person and telephonic hearings will be held at the following times and places:

**Presiding Officer: Administrative Law Judge Erin L. Gannon**

**IN-PERSON PUBLIC INPUT HEARINGS**

**Pre-registration is not required.**

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 City's requested rate increase, please contact the OCA toll free at 1-800-684-6560 or by email at [consumer@paoca.org](mailto: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 increase but do not want or cannot testify at the Public Input Hearings, you may file a formal complaint or comment to the proposed rate increase. 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. Tariff Issues (Not Briefed Above)
- XII. Miscellaneous Issues
- XIII. 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.