



COMMONWEALTH OF PENNSYLVANIA

November 21, 2025

**E-FILED**

Matthew L. Homsher, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street  
Harrisburg, PA 17120

**Re: Pennsylvania Public Utility Commission v. Pennsylvania-American Water  
Company / Docket Nos. R-2025-3057983 (Water) / R-2025-3058051 (Wastewater)**

Dear Secretary Homsher:

Enclosed please find the Complaint, Public Statement, and Verification, on behalf of the Office of Small Business Advocate (“OSBA”), in the above-referenced proceedings.

Copies will be served on all known parties in these proceedings, as indicated on the attached Certificate of Service.

If you have any questions, please do not hesitate to contact me.

Sincerely,

*/s/ Rebecca Lyttle*

Rebecca Lyttle  
Assistant Small Business Advocate  
Attorney ID No. 201399

*Enclosures*

cc: Jason Hails  
Roger Cathcart  
Joseph Kubas  
Parties of Record

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**Pennsylvania Public Utility Commission** :  
: **Docket Nos. R-2025-3057983 (Water)**  
v. : **R-2025-3058051 (Wastewater)**  
:  
**Pennsylvania-American Water Company** :

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**COMPLAINT OF THE  
OFFICE OF SMALL BUSINESS ADVOCATE**

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1. The Complainant is:

NazAarah Sabree  
Small Business Advocate  
Forum Place  
555 Walnut Street, 1<sup>st</sup> Floor  
Harrisburg, PA 17101

2. The names and addresses of the Complainant's attorneys are:

Rebecca Lyttle, Esq.  
Assistant Small Business Advocate  
Office of Small Business Advocate  
Forum Place  
555 Walnut Street, 1st Floor  
Harrisburg, Pennsylvania 17101  
[relyttle@pa.gov](mailto:relyttle@pa.gov)

Steven C. Gray, Esq.  
Senior Attorney  
Assistant Small Business Advocate  
Office of Small Business Advocate  
Forum Place  
555 Walnut Street, 1st Floor  
Harrisburg, Pennsylvania 17101  
[sgray@pa.gov](mailto:sgray@pa.gov)

3. The respondent utility is:

Pennsylvania-American Water Company  
852 Wesley Drive  
Mechanicsburg, PA 17055

4. The Complainant is authorized and directed by the Small Business Advocate Act, Act 181 of 1988, 73 P.S. §§ 399.41 - 399.50, to represent the interests of small business consumers of utility services in matters before the Pennsylvania Public Utility Commission (“Commission”).

5. This Complaint is filed against the rates, terms, and other provisions of the November 14, 2025, filing, pursuant to Sections 1308, 1311(c) and 1330 of the Public Utility Code, 66 Pa.C.S. §§ 1308, 1311(c) and 1330, by Pennsylvania-American Water Company (“PAWC” or the “Company”) Supplement No. 58 to Tariff Water-PA P.U.C. No. 5 and Supplement No. 61 to Tariff Wastewater PA P.U.C. No. 16, each bearing a proposed effective date of January 13, 2026, this tariff change is seeking a general rate increase.

6. The Company is filing for a \$168.7 million increase in water and wastewater rates based on a fully projected future test year ending June 30, 2027.

7. Complainant believes, and therefore avers that this Tariff materials may be insufficient to justify the rate increase requested, and that the Company’s present and proposed rates, rules, and conditions of service may be unjust, unreasonable, unduly discriminatory, and otherwise contrary to law, particularly as they pertain to small business customers.

8. Complainant believes, and therefore avers, that the Company’s present and proposed rates, rate design and cost and revenue allocation are or may be unjust, unreasonable, and unlawfully discriminatory in violation of, inter alia, Sections 1301 and 1304 of the Public Utility Code, 66 Pa. C.S. §§1301 and 1304, and contrary to appropriate public policy and sound ratemaking considerations and may not be supported by the materials filed by PAWC.

**WHEREFORE**, in view of the foregoing, the Small Business Advocate respectfully requests that the Pennsylvania Public Utility Commission:

- A. Suspend and investigate proposed Supplements No. 58 and 61;
- B. At the conclusion of said investigation, reject the proposed new rates and other tariff changes in Supplements No. 58 and 61, to the extent required to ensure that PAWC's rates are lawful, just, reasonable, and not unduly discriminatory to any class of customers, including small business consumers; and
- C. Grant such other relief as may be necessary or appropriate.

Respectfully submitted,

*/s/ Rebecca Lyttle*

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Rebecca Lyttle  
Assistant Small Business Advocate  
Attorney ID No. 201399

Commonwealth of Pennsylvania  
Office of Small Business Advocate  
Forum Place  
555 Walnut Street, 1<sup>st</sup> Floor  
Harrisburg, PA 17101

Dated: November 21, 2025



The Small Business Advocate is intervening in this proceeding to protect the interests of the Lancaster's small business customers. A thorough inquiry by the Commission into all elements of this filing is necessary to ascertain whether its proposal conforms to the Public Utility Code and to the Commission's regulations.

In view of the foregoing, the Small Business Advocate is requesting that the Application be subject to investigation before the Commission. The Small Business Advocate will ask the Commission to deny or modify any aspect of PAWC's proposal that is not proven to be just, reasonable, non-discriminatory, and fully in accordance with the Public Utility Code and the Commission's regulations regarding rate increases.

Dated: November 21, 2025

**VERIFICATION**

I, NazAarah Sabree, hereby state that the facts set forth herein above are true and correct to the best of my knowledge, information and belief and that I expect to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa. C.S. § 4904 (relating to unsworn falsification to authorities).

Date: November 21, 2025

  
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(Signature)

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

<b>Pennsylvania Public Utility Commission</b>	:	
	:	<b>Docket Nos. R-2025-3057983 (Water)</b>
<b>v.</b>	:	<b>R-2025-3058051 (Wastewater)</b>
	:	
<b>Pennsylvania-American Water Company</b>	:	

**CERTIFICATE OF SERVICE**

I hereby certify that true and correct copies of the foregoing have been served via email (*unless otherwise noted below*) upon the following persons, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

The Honorable Charles E. Rainey, Jr.  
Chief Administrative Law Judge  
Pennsylvania Public Utility Commission  
400 North Street  
Commonwealth Keystone Building  
Harrisburg, PA 17120  
[crainey@pa.gov](mailto:crainey@pa.gov)

Allison Kaster, Esquire  
Director  
Bureau of Investigation & Enforcement  
400 North Street  
Commonwealth Keystone Building  
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Date: November 21, 2025

/s/ Rebecca Lyttle  
Rebecca Lyttle  
Assistant Small Business Advocate  
Attorney ID No. 201399