



December 10, 2025

**Via E-Mail Only**

The Honorable Emily DeVoe  
Administrative Law Judge  
Piatt Place, Suite 220  
301 Fifth Avenue  
Pittsburgh, PA 15222  
[edevoe@pa.gov](mailto:edevoe@pa.gov)

The Honorable Jeffrey A. Watson  
Administrative Law Judge  
Piatt Place, Suite 220  
201 Fifth Avenue  
Pittsburgh, PA 15222  
[jeffwatson@pa.gov](mailto:jeffwatson@pa.gov)

**Re: Pennsylvania Public Utility Commission v. Pennsylvania-American Water Company**  
**Docket No. R-2025-3057983 (Water)**  
**Docket No. R-2025-3058051 (Wastewater)**

***Prehearing Memorandum of CAUSE-PA***

Your Honors:

Please find the attached **Prehearing Memorandum of the Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania (CAUSE-PA)** in the above noted proceeding.

As indicated on the attached Certificate of Service, service on the parties was accomplished by email only.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read "L.N. Berman".

Lauren N. Berman, Esq.  
*Counsel for CAUSE-PA*

CC: Secretary Matthew L. Homsher (via E-file only)  
Certificate of Service

**BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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

---

**PREHEARING MEMORANDUM  
OF THE COALITION FOR AFFORDABLE UTILITY SERVICES  
AND ENERGY EFFICIENCY IN PENNSYLVANIA**

---

**PENNSYLVANIA UTILITY LAW PROJECT**  
*Counsel for CAUSE-PA*



---

Lauren N. Berman, Esq., PA ID: 310116  
Elizabeth R. Marx, Esq., PA ID: 309014  
Ria M. Pereira, Esq., PA ID: 316771  
John W. Sweet, Esq., PA ID: 320182  
118 Locust Street  
Harrisburg, PA 17101  
Tel.: 717-236-9486  
Fax: 717-233-4088  
[pulp@pautilitylawproject.org](mailto:pulp@pautilitylawproject.org)

**December 10, 2025**

On December 5, 2025, a Prehearing Conference Order was issued by Deputy Chief Administrative Law Judge Jeffrey Watson and Administrative Law Judge Emily DeVoe setting a telephonic Prehearing Conference for Friday, December 12, 2025 at 10:00 a.m., and requiring parties to file a Prehearing Memorandum no later than 10:00 a.m. on Thursday, December 11, 2025. In response, the Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania (CAUSE-PA), through its counsel at the Pennsylvania Utility Law Project, hereby files this Prehearing Conference Memorandum.

**I. Background**

On November 14, 2025, Pennsylvania-American Water Company (PAWC or the Company) submitted a rate filing, 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, which proposes to increase rates by approximately \$168.7 million, or approximately 14.6%, based on a fully projected future test year ending June 30, 2027. (Volume I, Statement of Specific Reasons). According to the Company, if the entire rate request is approved as filed, the total bill for a residential water customer in Rate Zone 1 - Water who uses approximately 3,263 gallons per month would increase from \$81.55 to \$95.27, or by 16.8%, while the total bill for a residential wastewater customer in Rate Zone 1 – Wastewater using approximately 3,164 gallons per month would increase from \$109.50 to \$119.50 per month, or by 9.1%. (Volume I, Notice of Proposed Water and Wastewater Rate Changes).

On December 2, 2025, the Pennsylvania Public Utility Commission (Commission) entered Orders suspending Pennsylvania-American Water Company's proposed 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 until August 13, 2026, unless otherwise directed by Order of the Commission.

. On December 9, CAUSE-PA filed two Formal Complaints, one regarding PAWC's proposed Supplement to its Water Tariff and one regarding PAWC's proposed Supplement to its Wastewater Tariff. Those Complaints were docketed at C-2025-3059141 and C-2025-3059142, respectively. CAUSE-PA requests that its formal complaints be consolidated with the rate case dockets in this proceeding.

## **II. Discovery**

CAUSE-PA supports the discovery modifications proposed by the Office of Consumer Advocate (OCA).

In addition, CAUSE-PA understands that the Company will be requesting that these discovery modifications do not go into effect until January 1, 2026. CAUSE-PA can agree to the Company's request, but submits that given the short period between when these modifications are effective and the direct testimony due date for other parties, it is incumbent upon the Company to fully comply without fail to the modified discovery response periods.

## **III. Settlement**

CAUSE-PA is willing and ready to engage in settlement discussions in an attempt to resolve or narrow the issues in this proceeding, with any and all parties, and encourages the parties to engage in settlement discussions early in the process.

## **IV. Issues to be Presented**

Continued delivery of safe, affordable water and wastewater services is of critical importance to the safety, welfare, and economic stability of all Pennsylvanians – particularly those with limited financial means. In the event the Commission approves any increase to PAWC's water and wastewater rates, it should condition approval on PAWC's agreement to perform such actions

as are necessary to ensure service remains universally accessible to those who reside in PAWC's service territory and in compliance with all applicable sections of the Public Utility Code, Commission regulations and policy, and prior settlement agreements.

CAUSE-PA has conducted an initial review of PAWC's proposed tariff changes and testimony, and opposes PAWC's requests on the grounds that the proposed rate increases and tariff changes may result in unjust and unreasonable rates that would impose severe financial hardship on low and moderate income residential customers. CAUSE-PA identifies the following specific issues of concern, which it intends to address in this proceeding, though it reserves the right to raise additional issues which may arise through the course of this proceeding:

1. The conformity to law and the effect of PAWC's rate filing and proposed rate increases on low income households.
2. The effect of PAWC's proposal to bill wastewater customers on winter average use during summer months on low income households, and whether this practice would violate prior settlements and PUC orders.
3. The impact of the Renter Assistance Pilot Program (RAPP) stipends on low income renters in master-metered buildings, and whether these renters would be better supported by eligibility for low income programs.
4. The effect of PAWC's rate filing and proposed rate increases on low income households enrolled in or eligible for PAWC's low income assistance programs, and adequacy of those programs in delivering universally accessible services.
5. Whether PAWC's proposed changes to its low income programs are adequate to remediate the effect of the proposed rate increase and modification on low income customers.

CAUSE-PA asserts that the issues identified above, along with any future issues identified by interested parties as the case develops, must be thoroughly reviewed to ensure that all PAWC customers are able to access safe and affordable utility services. Without investigation of the above-stated issues, PAWC's tariff filing could result in unjust and unreasonable terms, conditions, and rates for critical water services that would impose severe hardship on the health, safety, and economic stability of residents in PAWC's service territory.

**V. Witnesses and Testimony**

CAUSE-PA intends to present the following witness to testify in this matter, but reserves the right to call additional or substitute witnesses as may be warranted upon proper notice to Your Honors and the parties:

Harry S. Geller, Esq.  
118 Locust Street  
Harrisburg, PA 17101  
[hgeller@pautilitylawproject.org](mailto:hgeller@pautilitylawproject.org)

Mr. Geller will address the issues identified above, as well as other issues that may arise throughout this proceeding.

**VI. Litigation Schedule**

CAUSE-PA is actively involved in discussions with PAWC and other parties to reach a mutually agreeable litigation schedule and to determine the appropriate amount of hearing time needed in this matter. In the absence of an alternative schedule being agreed to by the parties prior to the prehearing conference in this matter, CAUSE-PA proposes the following schedule:

Public Input Hearings	To be determined
Opposing Party Direct Testimony	Friday, January 30, 2026
Opposing Party Supplemental Direct Testimony Regarding Public Input Hearings	Thursday, February 19, 2026
Rebuttal Testimony (all parties and all issues)	Thursday, February 27, 2026
Surrebuttal Testimony (all parties and all issues)	Wednesday, March 12, 2026
Written Rejoinder or Outlines	Monday, March 16, 2026
Evidentiary Hearings (including oral rejoinder)	Wednesday - Thursday, March 17-18, 2026
Main Brief	Friday, April 3, 2026
Reply Brief	Friday, April 15, 2026

**VII. Public Input Hearings**

Given the size of the requested rate increases and the customer impact it may cause, CAUSE-PA respectfully requests that public input hearings be held in this matter.

**VIII. Service on CAUSE-PA**

CAUSE-PA is represented by the attorneys at the Pennsylvania Utility Law Project. All documents should be served on CAUSE-PA as follows:

Lauren N. Berman, Esq.  
Ria M. Pereira, Esq.  
Elizabeth R. Marx, Esq.  
John W. Sweet, Esq.  
**PENNSYLVANIA UTILITY LAW PROJECT**  
118 Locust Street  
Harrisburg, PA 17101  
Telephone: 717-236-9486  
Facsimile: 717-233-4088  
E-mail: [pulp@pautilitylawproject.org](mailto:pulp@pautilitylawproject.org)

CAUSE-PA requests that parties agree to electronic service in this proceeding.

**IX. Representation of CAUSE-PA at Prehearing Conference**

At the Prehearing Conference, CAUSE-PA will be represented by Lauren N. Berman,  
Esq.

WHEREFORE, CAUSE-PA respectfully submits this Prehearing Conference  
Memorandum.

Respectfully Submitted,

**PENNSYLVANIA UTILITY LAW PROJECT**  
*Counsel for CAUSE-PA*



---

Lauren N. Berman, Esq., PA ID: 310116  
118 Locust Street  
Harrisburg, PA 17101  
(717) 236-9486  
[pulp@pautilitylawproject.org](mailto:pulp@pautilitylawproject.org)

December 10, 2025

**BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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

---

**Certificate of Service**

I hereby certify that I have this day served copies of the **Prehearing Memorandum of the Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania** upon the parties of record in the above captioned proceeding in accordance with the requirements of 52 Pa. Code § 1.54.

**VIA Email Only**

The Honorable Emily DeVoe  
Administrative Law Judge  
Piatt Place, Suite 220  
301 Fifth Avenue  
Pittsburgh, PA 15222  
[edevoe@pa.gov](mailto:edevoe@pa.gov)

The Honorable Jeffrey A. Watson  
Administrative Law Judge  
Piatt Place, Suite 220  
201 Fifth Avenue  
Pittsburgh, PA 15222  
[jeffwatson@pa.gov](mailto:jeffwatson@pa.gov)

Elizabeth Rose Triscari, Esq.  
Teresa K. Harrold, Esq.  
Erin K. Fure, Esq.  
Pennsylvania-American Water Company  
852 Wesley Drive  
Mechanicsburg, PA 17055  
[elizabeth.triscari@amwater.com](mailto:elizabeth.triscari@amwater.com)  
[teresa.harrold@amwater.com](mailto:teresa.harrold@amwater.com)  
[erin.fure@amwater.com](mailto:erin.fure@amwater.com)

Kenneth M. Kulak, Esq.  
Mark A. Lazaroff, Esq.  
Catherine G. Vasudevan, Esq.  
Brooke E. McGlinn, Esq.  
2222 Market Street  
Philadelphia, PA 19103-3007  
[ken.kulak@morganlewis.com](mailto:ken.kulak@morganlewis.com)  
[mark.lazaroff@morganlewis.com](mailto:mark.lazaroff@morganlewis.com)  
[catherine.vasudevan@morganlewis.com](mailto:catherine.vasudevan@morganlewis.com)  
[brooke.mcglinn@morganlewis.com](mailto:brooke.mcglinn@morganlewis.com)

Carrie B. Wright, Esq.  
Pennsylvania Public Utility Commission  
Bureau of Investigation and Enforcement  
Commonwealth Keystone Building  
400 North Street, 2nd Floor  
Harrisburg, PA 17120  
[carwright@pa.gov](mailto:carwright@pa.gov)

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

Ryan Morden, Esq.  
Harrison W. Breitman, Esq.  
Janna E. Williams, Esq.  
Johnathan M. Longhurst, Esq.  
Olivia M. Spergel, Esq.  
Office of Consumer Advocate  
555 Walnut Street  
Forum Place, 5th Floor  
Harrisburg, PA 17101-1923  
[RMorden@paoca.org](mailto:RMorden@paoca.org)  
[HBreitman@paoca.org](mailto:HBreitman@paoca.org)  
[JWilliams@paoca.org](mailto:JWilliams@paoca.org)  
[JLonghurst@paoca.org](mailto:JLonghurst@paoca.org)  
[OSpergel@paoca.org](mailto:OSpergel@paoca.org)  
[OCAPAWC2025@paoca.org](mailto:OCAPAWC2025@paoca.org)

Zachary Bugay  
5813 Southampton Dr  
Bethel Park, PA 15102  
[zbugay@gmail.com](mailto:zbugay@gmail.com)

Brian Dugas  
10 Monument Ave, Apt 2  
Wyoming, PA 18644  
[briandugas54@gmail.com](mailto:briandugas54@gmail.com)

Carolann Hunt  
509 Windy Way  
New Cumberland, PA 17070  
[chunt561@gmail.com](mailto:chunt561@gmail.com)

Patricia Finley  
28 Bant Brook Circle  
Reading, PA 19606  
[finleypatti@gmail.com](mailto:finleypatti@gmail.com)

Christopher Cappuccitti  
10 Pelham Drive  
Coatesville, PA 19320  
[cjmitchrun@yahoo.com](mailto:cjmitchrun@yahoo.com)

David Dubos  
341 Christine Lane  
Jefferson Hills, PA 15025  
[ddubos@gmail.com](mailto:ddubos@gmail.com)

Rik Bharracharyya  
310 Crest Drive  
Clarks Green, PA 18411  
[rik.bt.66@gmail.com](mailto:rik.bt.66@gmail.com)

Curran Mitchell  
20 Pelham Drive  
Coatesville, PA 19320  
[cjmitchrun@yahoo.com](mailto:cjmitchrun@yahoo.com)

Michael Leone  
111 Juniper Drive  
Douglassville, PA 19518  
[mcl@ml-h.us](mailto:mcl@ml-h.us)

Mary Naydan  
1423 Scarlet Oak Rd  
Yardley, PA 19067  
[mknaydan@gmail.com](mailto:mknaydan@gmail.com)

Brooke Birkbichler  
6109 Pond View Dr  
Birdsboro, PA 19508  
[bbirckbichler@hotmail.com](mailto:bbirckbichler@hotmail.com)

David Hurlbrink  
12 Longview Drive  
Birdsboro, PA 19508  
[dave.hurlbrink@gmail.com](mailto:dave.hurlbrink@gmail.com)

William Balint  
300 Lowman Rd.  
Indiana, PA 15701  
[wsbalint@yahoo.com](mailto:wsbalint@yahoo.com)

Jay Croft  
4833 Partridge Drive  
Reading, PA 19606  
[jaysc222@yahoo.com](mailto:jaysc222@yahoo.com)

Ralf Neckien  
7 Mill Road  
East Norriton, PA 19401  
[ralf.neckien@gmail.com](mailto:ralf.neckien@gmail.com)

Connie Horhut  
3237 Circle Drive  
Pittsburgh, PA 15227  
[hi2connieh@gmail.com](mailto:hi2connieh@gmail.com)

Keith Sauer  
4824 Farming Ridge Blvd.  
Reading, PA 19606  
[keith.j.sauer@gmail.com](mailto:keith.j.sauer@gmail.com)

Deanna E. Pilkerton  
4996 Quince Drive  
Reading, PA 19606  
[dbaby83@aol.com](mailto:dbaby83@aol.com)

Elaine L. Bowman  
479 Tom Cat Road  
Piedmont, AL 36272  
[eskie36@gmail.com](mailto:eskie36@gmail.com)

Jeffrey Reichart  
1316 Fox Run Road  
Reading, PA 19606  
[jreichar@gmail.com](mailto:jreichar@gmail.com)

Linda J. Allison  
522 Pacific Ave  
York, PA 17404  
[xdiver@verizon.net](mailto:xdiver@verizon.net)

Joel Jackson  
Skyview Property, LLC  
1200 Taxville Road  
York, PA 17408  
[mrpa1212@aol.com](mailto:mrpa1212@aol.com)

Respectfully Submitted,

**PENNSYLVANIA UTILITY LAW PROJECT**  
*Counsel for CAUSE-PA*



---

Lauren N. Berman, Esq., PA ID: 310116  
118 Locust Street  
Harrisburg, PA 17101  
(717) 236-9486  
[pulp@pautilitylawproject.org](mailto:pulp@pautilitylawproject.org)

December 10, 2025