



COMMONWEALTH OF PENNSYLVANIA

April 7, 2026

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. Montgomery Sewer Company, Inc /
Docket No. R-2026-3061282**

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 proceeding.

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

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

Sincerely,

/s/ Steven C. Gray

Steven C. Gray
Senior Attorney
Assistant Small Business Advocate
Attorney ID No. 77538

Enclosures

cc: Justin Bieber
Parties of Record

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission :
: **Docket No. R-2026-3061282**
v. :
:
Montgomery Sewer Company, Inc. :

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

1. The Complainant is:

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

2. The name and address of the attorney for the Office of Small Business Advocate (“OSBA”) is:

Steven C. Gray, Esq.
Senior Attorney
Assistant Small Business Advocate
Office of Small Business Advocate
Forum Place
555 Walnut Street, 1st Floor
Harrisburg, PA 17101
sgray@pa.gov

3. The respondent utility is:

Montgomery Sewer Company, Inc.
P.O. Box 851
515 Stump Road
Montgomery, PA 18936

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 Tariff Wastewater – PA PUC No. 2 (“Tariff No. 2”), which was filed with the Commission on March 23, 2026, by Montgomery Sewer Company, Inc. (“Montgomery” or the “Company”). The rates set forth in the Company’s March 23rd filing, if approved by the Commission, would increase Montgomery’s annual revenues by \$84,600.

6. According to Montgomery’s March 23rd filing, the Company currently has 18 small business customers. Tariff No. 2 proposes a \$25 increase to the monthly charge paid by the Company’s small business customers.

7. According to Montgomery’s March 23rd filing, that \$25 increase to the monthly charge will result in 75% increase to the small business customers’ monthly bill for wastewater service.

8. After preliminary review of the materials filed by the Company in support of the proposed Tariffs, Complainant believes, and therefore avers, that those 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 Montgomery’s small business customers.

9. Complainant believes, and therefore avers, that Montgomery’s proposed tariff changes, proposed rates, rate design, 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, furthermore, are contrary to appropriate public policy, sound ratemaking considerations, and may not be supported by the materials filed by Montgomery.

10. In view of the foregoing, the Small Business Advocate respectfully requests that the Pennsylvania Public Utility Commission:

- A. Suspend and investigate the operation of Tariff No. 2;
- B. At the conclusion of such investigation, reject the proposed new rates and other tariff changes in Tariff No. 2 to the extent required to make certain that Montgomery's rates are lawful, just, reasonable, and not unduly discriminatory against small business customers; and
- C. Grant such other relief as may be necessary or appropriate.

Respectfully submitted,

/s/ Steven C. Gray

Steven C. Gray
Senior Attorney
Assistant Small Business Advocate
Attorney ID No. 77538

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

Dated: April 7, 2026

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission	:	
	:	Docket No. R-2026-3061282
v.	:	
	:	
Montgomery Sewer Company, Inc.	:	

**PUBLIC STATEMENT OF
THE OFFICE OF SMALL BUSINESS ADVOCATE**

The Small Business Advocate is authorized and directed to represent the interest of small business consumers of utility services in Pennsylvania under the provisions of the Small Business Advocate Act, Act 181 of 1988, 73 P.S. §§ 399.41 - 399.50 (“Act”). The Act further provides that the Small Business Advocate is to issue publicly a written statement stating concisely the specific interest of small business consumers to be protected by her initiation of or intervention in any proceeding involving those interests before the Public Utility Commission (“Commission”) or any other agency or court. This public statement relates to the filing today by the Small Business Advocate of a complaint against the proposed rate tariff filing of Montgomery Sewer Company, Inc. (“Montgomery” or “Company”), which would increase the annual operating revenue of Montgomery by \$84,200 per year.

The Small Business Advocate files this formal complaint against the Company’s proposed base rate tariff filings to protect the interests of Montgomery’s small business customers. Montgomery’s filing proposes to increase the Company’s small business monthly rates by 75%. A thorough inquiry by the Commission into all elements of the Company’s

proposed tariff filings is necessary to ensure that the tariff filings are lawful, just, reasonable, and not discriminatory to Montgomery's small business customers.

In view of the foregoing, the Small Business Advocate will participate in proceedings before the Public Utility Commission to investigate the reasonableness of the proposed base rate tariff filings. The Small Business Advocate will ask the Commission to deny any proposed new rates and other tariff changes that apply to small business customers that are not proven by Montgomery to be lawful, just, reasonable, and not discriminatory to the Company's small business customers.

Dated: April 7, 2026

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: 04/07/2026

NazAarah Sabree

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission	:	
	:	Docket No. R-2026-3061282
v.	:	
	:	
Montgomery Sewer Company, Inc.	:	

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
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17120
crainey@pa.gov

Darryl Lawrence, Esquire
Consumer Advocate
PA Office of Consumer Advocate
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Allison Kaster, Esquire
Director
Bureau of Investigation & Enforcement
400 North Street
Commonwealth Keystone Building
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akaster@pa.gov

Anne E. Hassan
President
Montgomery Sewer Co. Inc.
P.O. Box 851
515 Stump Road
Montgomeryville, PA 18936
montgomerysewercompanyinc@yahoo.com

Date: April 7, 2026

/s/ Steven C. Gray
Steven C. Gray
Senior Attorney
Assistant Small Business Advocate
Attorney ID No. 77538