



COMMONWEALTH OF PENNSYLVANIA

May 8, 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 Prehearing Memorandum, 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



## **II. FILING BACKGROUND**

On March 23, 2026, the Montgomery Sewer Company, Inc. (“Montgomery” or the “Company”) filed Tariff No. 2 to Tariff – Wastewater Pa. P.U.C. No. 1 with the Commission. Tariff No. 2, if approved by the Commission, would increase Montgomery’s annual revenue by \$84,600.

The OSBA filed a Complaint in response to Tariff No. 2 on April 7, 2026.

## **III. IDENTIFICATION OF WITNESS AND TENTATIVE ISSUES**

Assisting in the development and presentation of the OSBA’s case in this proceeding is:

Justin Bieber  
Energy Strategies  
111 East Broadway, Suite 1200  
Salt Lake City, Utah, 84111  
[jbieber@energystrat.com](mailto:jbieber@energystrat.com)

The OSBA will participate in this proceeding to ensure that the interests of Montgomery’s small business customers are adequately represented and protected.

After a review of the proceeding to date, the OSBA has identified the following list of issues that it will evaluate in this proceeding:

1. Whether the rates, terms, and other provisions of Tariff No. 2 would result in the implementation of a rate structure which would be unjust, unreasonable, unduly discriminatory and otherwise contrary to law, particularly as it pertains to small business customers.
2. Whether those materials filed by the Company are sufficient to justify the rate increase requested, particularly as it pertains to small business customers.

The OSBA reserves the right to pursue additional issues that may arise throughout this proceeding.

**IV. SERVICE OF DOCUMENTS**

In accordance with 52 Pa. Code § 1.54(b)(3)(i), the OSBA agrees to accept electronic mail delivery of documents on the due date<sup>1</sup> as satisfying the in-hand requirement. The OSBA requests that email delivery of documents also be provided to its witnesses identified above.

In addition to email copies of pleadings, briefs, and exceptions, the OSBA requests email copies of responses to discovery propounded by the OSBA or any other party.

**V. SETTLEMENT**

The OSBA notes its willingness to enter settlement discussions at the appropriate phase of this proceeding.

**VI. HEARING AND BRIEFING SCHEDULE**

At the time of this writing, the OSBA is working with the parties to develop a procedural schedule.

Respectfully submitted,

/s/ Steven C. Gray

Steven C. Gray, Esq.  
Senior Attorney  
Assistant Small Business Advocate  
Attorney ID # 77538

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

Dated: May 8, 2026

---

<sup>1</sup> In accordance with 52 Pa. Code § 1.56(a)(5), documents must be received by 4:30 pm.

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**Pennsylvania Public Utility Commission** :  
: **Docket No. R-2026-3061282**  
v. : **C-2026-3061627**  
:  
:  
**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 Barbara Shadie Nause  
Administrative Law Judge  
Pennsylvania Public Utility Commission  
Philadelphia District Office  
801 Market Street, Suite 4063  
Philadelphia, PA 19107  
[bshadienau@pa.gov](mailto:bshadienau@pa.gov)

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

Allison Kaster, Esquire  
Bureau of Investigation & Enforcement  
Commonwealth Keystone Building  
400 North Street  
Harrisburg, PA 17120  
[akaster@pa.gov](mailto:akaster@pa.gov)

Alex Arduino  
153 Orchard Drive  
North Wales, PA 19454  
[ajma99@yahoo.com](mailto:ajma99@yahoo.com)

Darryl Lawrence, Esquire  
Consumer Advocate  
PA Office of Consumer Advocate  
Forum Place  
555 Walnut Street, 5th Floor  
Harrisburg, PA 17101-1923  
[ra-oca@paoca.org](mailto:ra-oca@paoca.org)

Margaret O'Brien  
116 Jonathan Drive  
North Wales, PA 19454  
[margeobrien@msn.com](mailto:margeobrien@msn.com)

Date: May 8, 2026

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