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July 31, 2026

VIA ELECTRONIC FILING

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

**Re: Letter Petition of Springhouse Waterworks Inc. for Waiver of the 180-Day
Historic Test Year Requirement Set Forth at 52 Pa. Code §§ 53.51a and
53.52(b)(2); Docket No. P-2026-_____**

Dear Secretary Homsher:

On behalf of Springhouse Waterworks Inc. ("Springhouse" or the "Company"), please accept this Letter Petition requesting that the Pennsylvania Public Utility Commission ("Commission") grant a waiver of the requirement, set forth at 52 Pa. Code §§ 53.51a and 53.52(b)(2), that a small water or wastewater public utility support a base rate filing with an operating income statement for a historic test year ("HTY") ending no later than 180 days prior to the rate filing.

Springhouse is separately filing today short form schedules in support of a proposed base rate increase. The short form filing is supported by an operating income statement and related financial data for the HTY consisting of the twelve months ended December 31, 2025. Because the instant filing is being made approximately 212 days after the close of that HTY, a waiver of the 180-day limitation is required in for the Company to rely on calendar year 2025 data. Springhouse requests that the Commission act on this petition in conjunction with its review of the accompanying rate filing.

I. The Regulations at Issue

Section 53.51a of the Commission's regulations defines the historic test year for a small water or wastewater public utility as follows:

HTY—Historic test year—The experienced 12-consecutive-month period corresponding to one of the following time frames:

(1) For a small water public utility or a small wastewater public utility or a municipal corporation, the experienced 12-consecutive-month period ending no later than 180 days prior to the rate filing.

52 Pa. Code § 53.51a. Section 53.52(b)(2), in turn, requires that a public utility filing a tariff, revision or supplement that will increase or decrease the bills to its customers file, in addition to the requirements of subsection (a), a statement showing “[t]he operating income statement of the public utility for the HTY.” 52 Pa. Code § 53.52(b)(2). Read together, these provisions would require Springhouse to develop an operating income statement for a twelve-month period ending no earlier than February 1, 2026 in order to file on today’s date. The 180-day period measured from the close of calendar year 2025 expired on June 29, 2026.

II. Relief Requested

Springhouse requests a waiver of 52 Pa. Code §§ 53.51a and 53.52(b)(2) to the limited extent necessary to permit the Company to use an operating income statement, and supporting schedules, for the HTY consisting of the twelve months ended December 31, 2025, notwithstanding that the accompanying rate filing is being made more than 180 days after the close of that period. Springhouse seeks no other relief from Chapter 53 and no relief from any substantive filing requirement; all schedules, statements and supporting data otherwise required of a small water or wastewater public utility accompany the Company’s filing.

III. Good Cause Supports the Requested Waiver

A. Springhouse is a very small utility that could not close its books in time to file within 180 days.

Springhouse is a “small water public utility” within the meaning of 52 Pa. Code § 53.51a, serving approximately 497 customers. The Company has no full-time accounting staff and relies on an outside accountant to maintain its books and records and to prepare its annual financial statements. As a result of delays in completing the Company’s year-end closing and the compilation of its 2025 financial statements, complete and reliable calendar year 2025 financial information did not become available to the Company in time to prepare the schedules necessary to support a base rate filing before the 180-day period lapsed on June 29, 2026.

B. Denial of the waiver would increase rate case expense borne by customers.

If the waiver is denied, Springhouse’s only practical alternative would be to withdraw its filing and re-develop it around a later twelve-month period — for example, the twelve months ended June 30, 2026. That would require the Company to re-derive its operating income statement, rate base and revenue requirement, to re-prepare each supporting schedule, and to incur additional accounting, consulting and legal charges to do so. Those costs would be sought as rate case expense and would ultimately be borne by Springhouse’s customers, who are few in number and among

whom such costs are therefore spread thinly. Granting the waiver avoids duplicative expense without any corresponding benefit to ratepayers.

C. No party is prejudiced.

The requested waiver is procedural in nature and does not limit the scope of review available to the Commission, the Bureau of Investigation and Enforcement, the Office of Consumer Advocate, the Office of Small Business Advocate, or any other participant. Calendar year 2025 remains an experienced twelve-consecutive-month period, and the operating income statement submitted with the Company's filing reflects actual, recorded results rather than projections. The suspension period afforded under 66 Pa. C.S. § 1308 provides ample opportunity to test the reasonableness of the Company's claims on the record.

IV. Authority

This petition is submitted pursuant to 52 Pa. Code § 5.43, which provides for petitions seeking the waiver of a Commission regulation, and 52 Pa. Code § 1.2(c), under which the Commission may waive a regulation "for good cause" where the waiver will not adversely affect a substantive right of a party. For the reasons stated above, good cause exists here: the deviation is limited, the underlying data is actual and complete, no party is prejudiced, and the waiver conserves ratepayer funds.

V. Conclusion

WHEREFORE, Springhouse respectfully requests that the Commission grant a waiver of 52 Pa. Code §§ 53.51a and 53.52(b)(2) to permit the Company to support its base rate filing made on July 31, 2026 with an operating income statement for the historic test year ended December 31, 2025.

Please contact the undersigned with any questions concerning this filing.

Very truly yours,

/s/ Whitney E. Snyder

Whitney E. Snyder
KC Read-Fisher

Counsel for Springhouse Waterworks, Inc.

WES/jld

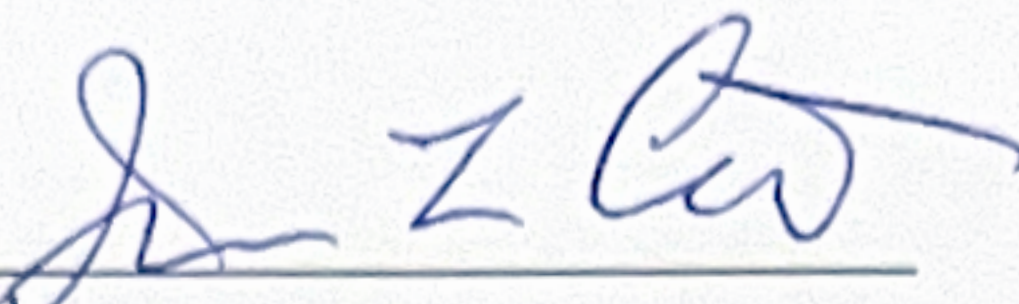
Enclosures

cc: Certificate of Service
Stephanie Wimer, BI&E

VERIFICATION FOR LETTER PETITION

I, James L. Crist, President, Lumen Group, consultant for Springhouse Waterworks Inc., hereby state that the facts set forth in the foregoing Letter Petition for Waiver are true and correct to the best of my knowledge, information and belief, and that I expect the Company 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: July 31, 2026



James L. Crist
President
The Lumen Group
Consultant for Springhouse Waterworks Inc.

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Letter Petition of Springhouse Waterworks, Inc. was served upon the persons listed below, in the manner indicated, in accordance with 52 Pa. Code §§ 1.54 and 65.54(a):

SERVED VIA ELECTRONIC MAIL ONLY

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akaster@pa.gov

/s/ Whitney E. Snyder

Whitney E. Snyder
KC Read-Fisher

Dated: July 31, 2026