



COMMONWEALTH OF PENNSYLVANIA

August 20, 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. Reynolds Water Company /
Docket No. R-2026-3064271**

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/ Rebecca Lyttle

Rebecca Lyttle
Assistant Small Business Advocate
Attorney ID No. 201399

Enclosures

cc: Jason Hails
Roger Cathcart
Parties of Record

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission	:	
	:	Docket No. R-2026-3064271
v.	:	
	:	
Reynolds Water Company	:	

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

1. The Complainant is:

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

2. The name and address of the Complainant's attorney is:

Rebecca Lyttle, Esq.
Assistant Small Business Advocate
Office of Small Business Advocate
Forum Place
555 Walnut Street, 1st Floor
Harrisburg, PA 17101
relyttle@pa.gov

3. The respondent utility is:

Reynolds Water Company
301 Arlington Drive
Greenville, PA 16125

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 July 31,

2026, filing, pursuant to Sections 1308, 1311(c) and 1330 of the Public Utility Code, 66 Pa.C.S. §§ 1308, 1311(c) and 1330, by the Reynolds Water Company (the “Company”) of their Supplement No. 14 to the Company's Tariff Water - Pa. P.U.C. No. 4 ("Tarriff").

6. The Company is filing for a \$359,994.00 dollar increase in its water rates.

7. The Tarriff is requesting an increase in the total bill for a commercial customer with a 5/8-inch meter connection using 5,100 gallons from \$60.58 to \$93.68 per month or by 54.6%.

8. 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.

9. 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 the Company.

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

- A. Suspend and investigate proposed Supplement No. 14;
- B. At the conclusion of said investigation, reject the proposed new rates and other tariff changes in Supplements No. 14, to the extent required to ensure that the Company'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
Rebecca Lyttle
Assistant Small Business Advocate
Attorney ID No. 201399

For:
NazAarah Sabree
Small Business Advocate

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

Date: August 20, 2026

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission	:	
	:	Docket No. R-2026-3064271
v.	:	
	:	
Reynolds Water Company	:	

**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 (the “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 a complaint or an 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 in the above-captioned Commission proceeding.

On July 31, 2026, the Reynolds Water Company (the “Company”) filed Supplement No. 14 to the Company's Tariff Water - Pa. P.U.C. No. 4 (“Supplement No. 14” or "Tariff"). This Tarriff is to become effective on September 29, 2026, and proposes an increase in rates designed to produce additional annual revenue of \$359,994.00.

The Small Business Advocate is filing a Complaint in this proceeding to protect the interests of the Company’s Small Business water customers. A thorough inquiry by the

Commission into all the elements of Supplement No. 14, is necessary to ascertain whether it conforms to the Public Utility Code and to the Commission's regulations.

In view of the foregoing, the Small Business Advocate is requesting that Supplement No. 14 be either denied or subject to investigation and evidentiary hearings before the Commission. The Small Business Advocate will ask the Commission to deny or modify any aspect the Company's Water's proposals that are not proven to be just, reasonable, non-discriminatory, and fully in accordance with the Public Utility Code and the Commission's regulations.

Dated: August 20, 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: 08/20/2026

NazAarah Sabree

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission	:	
	:	Docket No. R-2026-3064271
v.	:	
	:	
Reynolds Water Company	:	

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
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Seth A. Mendelsohn, Esquire
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Harrisburg, PA 17112
smendelsohn@saxtonstump.com

Date: August 20, 2026

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