



**PENNSYLVANIA
OFFICE OF
SMALL
BUSINESS
ADVOCATE**



ANNUAL REPORT

FISCAL YEAR 2023–2024

**NazAarah Sabree
SMALL BUSINESS ADVOCATE**



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**Your voice at the table
advocating for safe, reliable, and affordable utility service!**

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Pennsylvania Office of Small Business Advocate Staff

Fiscal Year 2023-2024

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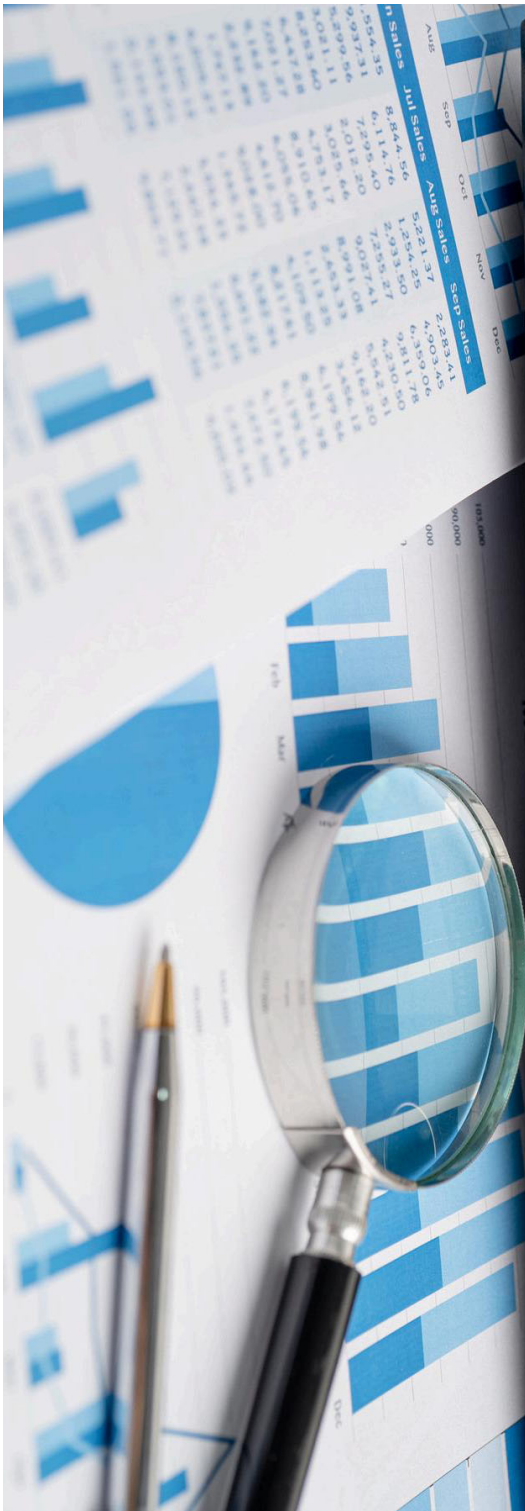
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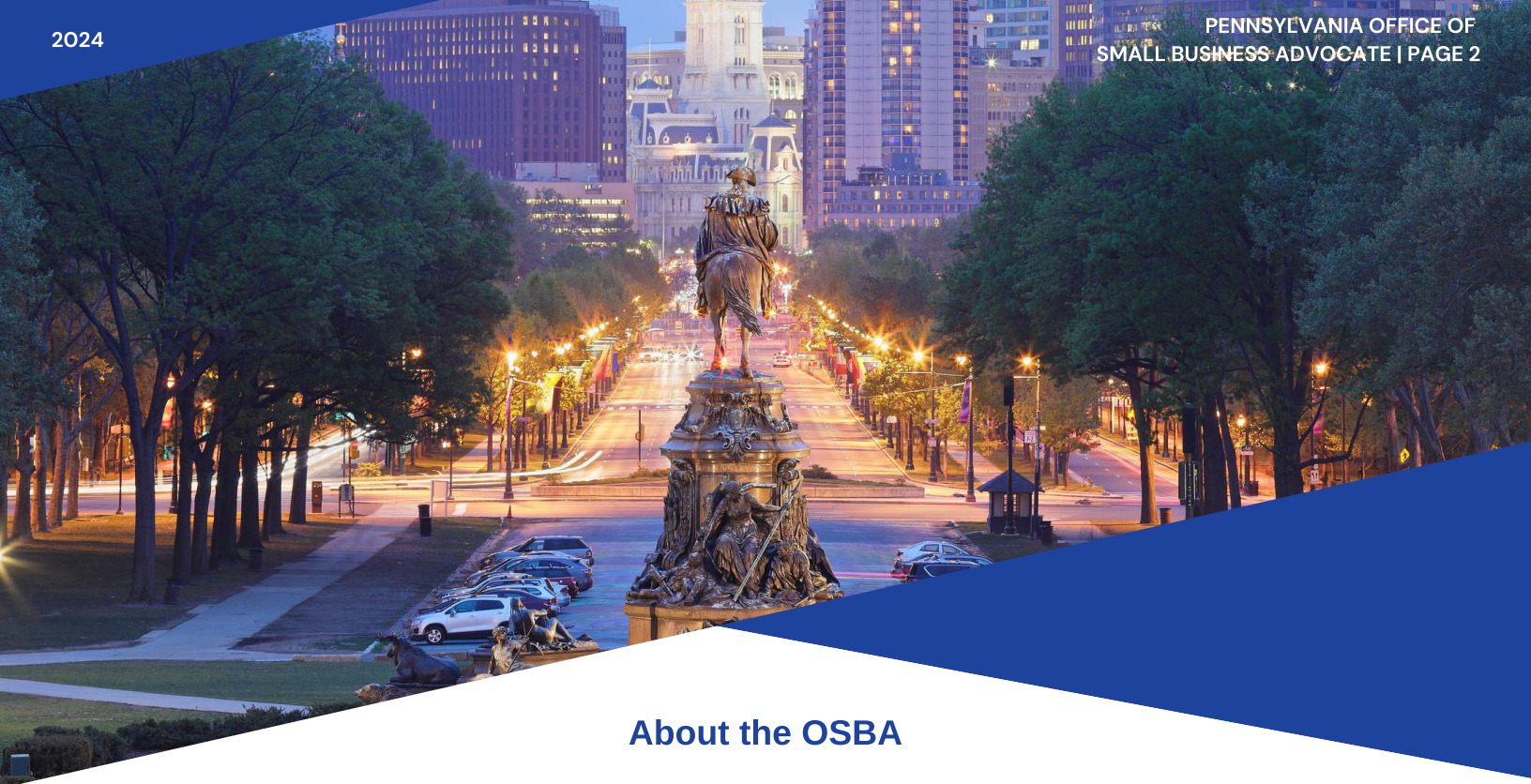
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About the OSBA

The Pennsylvania Office of Small Business Advocate (OSBA) is an independent agency representing small businesses with 250 or fewer employees in regulated utility matters before the Pennsylvania Public Utility Commission (PUC), state and federal regulatory agencies, and courts.

Before 1988, small businesses lacked representation in matters before the Pennsylvania Public Utility Commission (PUC). While residential and low-income consumers had advocates and large commercial and industrial customers had support from private law firms, small businesses were left without representation. This lack of representation often resulted in small business utility consumers shouldering a disproportionate share of rate increases. Given that small businesses account for 99.6% of all businesses in the Commonwealth, this disparity had a significant impact on Pennsylvania's economy.

To address this issue, the Legislature established the PA Office of Small Business Advocate (OSBA). The only one of its kind in the nation, the OSBA was created by the Pennsylvania General Assembly through the Small Business Advocate Act of December 21, 1988, 73 P.S. § 399.41, et seq.

Today, the OSBA advocates on behalf of 1.1 million small businesses and plays a vital role in ensuring their voices are heard.

Office of Small Business Advocate Impact

As we reflect on the past fiscal year, the OSBA's impact stands as a testament to the effective advocacy we provide for small businesses. Through a commitment to ensuring small businesses sustain and thrive, the OSBA has been intentional in its strategies, delivering measurable outcomes and notable successes achieved throughout the past year. The OSBA engages in major rate, merger, and acquisition cases including non-rate proceedings that have significantly impacted small commercial and industrial consumers.

During Fiscal Year 2023-2024, the OSBA actively participated in approximately 215 cases. These efforts addressed an overall requested increase of \$243.3 million.

- 40 Base Rate Filings
- 40 Electric Filings
- 33 Telephone and Broadband Filings
- 27 Water, Wastewater, and Stormwater Filings
- 26 Section 1102 Filings
- 16 Section 1307(f) Filings
- 11 Gas Filings
- 9 DSP Filings
- 7 Section 1329 Filings
- 3 Merger Filings
- 3 Non-Certificated Filings
- 1 Commonwealth Court of Pennsylvania Appeal Case

Office of Small Business Advocate Impact

The OSBA staff has participated in numerous proceedings spanning across nearly all of Pennsylvania's utilities.

- 92 Telephonic and In Person Hearings
- 66 Public Input Hearings
- 49 Prehearing and Status Conferences
- 26 Initial, Evidentiary, and Post Hearings
- 6 Mediations

Furthermore, leveraging its expertise and success in litigation, the OSBA's statutory responsibilities were expanded following the 1993 reforms to Pennsylvania's Workers Compensation Act.

The OSBA provides expert actuarial review and evaluation of, accompanied by comments and recommendations for improvement on, the loss cost filings that are submitted annually to the Pennsylvania Insurance Department by the Pennsylvania Compensation Rating Bureau (PCRB) and the Coal Mine Compensation Rating Bureau of Pennsylvania (CMCRB).



Outreach and Education

In addition to managing its litigation caseload, the OSBA addressed individual complaints and inquiries from small business consumers, facilitating swift resolutions. We prioritized education and outreach, and collaborated with key stakeholders in discussions about the challenges small businesses were experiencing with their utilities. Moreover, small business consumers throughout Pennsylvania contacted us directly via our website, email, or on our hotline regarding utility issues.

Through these efforts, the OSBA has accomplished the following:

- Resolved small business inquiries through direct support.
- Provided assistance with payment arrangements, service shutoffs, errors, and utility overcharging issues.
- Provided referrals to the City of Philadelphia Commerce Department, PA Department of State, U. S. Small Business Administration (SBA), PA Department of Community and Economic Development (DCED) Business One-Stop Shop, legislators, and others for their specific small business needs, etc.
- Hosted pre-filing meetings with utilities leadership and met with customer support teams to address small business consumer concerns.
- Met one on one with small business owners to discuss their utility needs.
- Included small business language in the PA Public Utility Commission's press releases and internal communication.
- Toured several utility facilities to gain a deeper understanding of utility usage and energy production.
- Meet and greets with Economic Development Corporations, Chambers of Commerce legislators, and a host of other agencies.
- Attended and participated as a panelist at various small business summits, webinars, energy conferences and community empowerment events to educate attendees and raise awareness about the OSBA and the resources and support available to small businesses.

Case Highlights

In the past fiscal year, the OSBA's advocacy achieved over \$14.5 million dollars in utility rate savings for small business consumers across the Commonwealth. A few notable successes are outlined below, highlighting the impact of our representation for Pennsylvania's small businesses.

Frontier Telephone & Broadband Case / Docket C-2023-3037574

On January 9, 2023, the Office of Small Business Advocate (OSBA) and the Office of Consumer Advocate (OCA) filed a Joint Complaint addressing service outages and quality of service issues against Commonwealth Telephone Company LLC d/b/a Frontier Communications Telephone Company. The Joint Complaint was based upon over 300 informal complaints against Frontier, submitted by residential and small business consumers to legislators and subsequently forwarded to the OSBA and the OCA.

The OSBA and the OCA identified numerous problems with the provision of service by Frontier, including:

- Frontier's mismanagement of its network, staffing, and response to consumer outages.
- Frontier's violation of its obligations to provide and maintain adequate, efficient, safe, and reasonable services and facilities in compliance with Section 1501 of the Public Utility Code.

In June and July of 2023, the Public Utility Commission held five in-person Public Input Hearings in four communities in Frontier's service territory which the OSBA attended.

The OSBA and the OCA engaged in settlement negotiations. The settlement provided a definitive framework for Frontier to improve its quality of service and to meet its obligation to make broadband service available to its consumers.

The settlement also provided relief to Frontier's consumers for the period of the settlement, dating back to July 1, 2022, that set forth measurable financial incentives for Frontier to provide reliable and timely installation of services and repairs.

Additionally, the settlement provided a rate cap for small business consumers through January 1, 2025. At a time when all types of utility service are becoming more expensive, the rate cap provided a degree of relief to Frontier's small business consumers as it works to improve its overall quality of service.

UGI Electric Rate Case / Docket R-2022-3037368

On January 27, 2023, UGI Utilities, Inc. - Electric Division filed tariffs that, if approved by the Commission, would have increased UGI Electric's annual rates by \$11.4 million.

The OSBA reviewed UGI Electric's original filing, conducted discovery, and filed expert testimony in this proceeding. The filing was evaluated for whether the rates proposed for small business consumers were consistent with sound economics, regulatory principles, and the Commission's precedent from the Company's 2018 and 2021 base rates proceedings. The OSBA focused on the issues of cost allocation, revenue allocation, and rate design for small and medium business customers.

UGI Electric has two small commercial and industrial GS-1 and GS-4 classes.

The case was settled on terms favorable to UGI Electric's small business consumers. The OSBA actively participated in the negotiations that led to a proposed settlement and was a signatory to the Joint Petition for Approval of Settlement of All Issues.

The OSBA saved UGI Electric's small business consumers \$1,967,162 annually.

PGW Rate Case / Docket R-2023-3037933

On February 27, 2023, PGW filed Supplement No. 159 to Philadelphia Gas Work's Gas Service Tariff-Pa. P.U.C. No. 2, and proposed Supplement No. 105 to Philadelphia Gas Works Supplier Tariff-Pa. P.U.C. No 1 (Supplement No. 105). The proposed Tariffs, if approved by the Commission, would have increased the retail distribution rates of Philadelphia Gas Works (PGW or Company) by \$85.5 million per year (before the effects on universal service charges and distribution system improvement charges are recognized). In addition to the rate filing, PGW also filed a Petition for Waiver seeking a waiver of the application of the statutory definition of the fully projected future test year (FPFTY) to permit PGW to use a FPFTY beginning September 1, 2023.

The OSBA filed a Formal Complaint against the proposed increase noting that, rather than the claimed \$85.2 million, the Company's proposals in this proceeding would result in an increase of \$101.3 million.

The Commission ultimately awarded PGW only a \$26,201,000 annual revenue increase to the Company's pro forma revenue at present rates of \$832,370,00 or approximately 3.15%.

The OSBA saved PGW's small business consumers \$6,118,755 annually.

PWSA Rate Case / Docket R-2023- 3039920, 9921 & 9919.

On May 11, 2023, the Pittsburgh Water and Sewer Authority (“PWSA”) filed for proposed revenue increases for its water, wastewater, and storm water services.

The proposed increases consisted of a multi-year rate plan which, if approved by the Commission, would increase PWSA’s overall rates by approximately \$146.1 million: \$46.8 million in 2024, \$45.4 million in 2025, and \$53.9 million in 2026.

The OSBA successfully argued to remove the proposed revenue increases in 2025 and 2026 and for the \$46.8 million revenue increase to be reduced to \$36 million. PWSA agreed to settle on these terms.

Moreover, PWSA proposed to increase its Distribution System Improvement Charge (DSIC) to 7.5%. The OSBA opposed this increase and PWSA conceded the issue in settlement, and its DSIC remains at 5.0%.

The OSBA saved PWSA’s small business consumers \$6,418,338.

Electric Overview

The rates charged by an Electric Distribution Company (EDC) include the cost of purchasing electricity from a supplier, the cost of transporting that electricity from the power plant to the EDC's service territory (the transmission rate), and the cost of delivering that electricity through the EDC's wires to consumers' premises (the distribution rate).

Pennsylvania EDC's no longer generate electricity. Therefore, an EDC is required to purchase electricity from generators and transport it to the service territory in order to serve the EDC's non-shopping, i.e., default service, consumers. The EDC is required to deliver that electricity through the EDC's wires to its default service consumers and also deliver electricity through those wires which shopping customers have bought from electric generation suppliers (EGSs).

The OSBA advocated for small businesses in 52 docketed electric proceedings.

Electric Proceedings

- Citizens 2022 CHP Pilot Program (P-2022-3034250)
- Duquesne 2020 Income Payment Plan (P-2020-302277 & M-2019- 3008227)
- PECO Amend USCEP (P-2020-3020727, M-2018-3005795)
- FirstEnergy DSIC & LTIPs(P-2015-2508931, 8936, 942 & 8948)
- PECO Elec 2021 BRC (R-2021-3024601) PECO 2020 DSP V (P-2020-3019290)
- PPL 2020 Phase IV EE&C (M-2020-3020824)
- Pike City 2023 DSP (P-2023-3039927)
- FE 2023 Merger (A-2023-3038771, 8792, 8793, 8794, 8795, 8807, 8808; G-2023-3038818, 8819, 8820, 8821; & G-00020956)
- ATSI, MATT, TRAILCO 2023 Purchase (A-2023-3040481, A-2023- 3040482, A-2023-3040483; G-2023-3040484, G-2023-3040485 & 0486)
- BI&E v. Planet Energy (C-2023-3041126)
- FirstEnergy 2020 Phase IV EE&C (M-2020-3020820, 21, 22 & 23)
- UGI Elec 2023 Phase IV EE&C (M-2023-3043230)
- PECO DSP VI 2025-2029 (P-2024-3046008)

2024

- PPL 2025-2029 DSP VI (P-2024-3047290)
- Duquesne 2024 BRC (R-2024-3046523)
- PECO Electric 2024 BRC (R-2024-3046931)
- FE PA 2024 BRC (R-2024-3047068)
- Duquesne 2025-2029 DSP X (P-2024-3048592)
- PPL 2024 DSIC Waiver (P-2024-3048732)
- UGI Electric DSP V 2025-2029 & UGI Electric DSP AIA (P-2024-3049343 & G-2024-3049351)
- PPL Electric 2024 Second DER (P-2024-3049223)
- Citizens & Wellsboro 2025-2029 DSP VII (P-2024-3049357 & P-2024-3049359)
- App of Transource; AIA; Zoning Exemption (A-2024-3049272, G-2024-3049271 & P-2024-3049273)



Gas Overview

The rates charged by a Natural Gas Distribution Company (NGDC) include both the cost of the gas and the cost of distributing that gas through the NGDC's pipes to consumers' premises. The cost of the gas includes the amount paid by the NGDC for the gas itself, the amount paid by the NGDC to transport the gas from the well to the NGDC's service territory, and the amount (if any) paid by the NGDC to store the gas until consumers need it.

The NGDC is required to acquire gas and to deliver it through the NGDC's pipes for non-shopping consumers, i.e., sales consumers. The NGDC is also required to use its pipes to deliver gas purchased by shopping consumers, i.e., transportation consumers, from Natural Gas Suppliers (NGSs). The NGDC collects the cost of the gas from its non-shopping consumers through the Gas Cost Rate (GCR). The NGDC collects the delivery costs from both shopping and non-shopping consumers through distribution rates.

The OSBA advocated for small businesses in 37 docketed gas proceedings.

Gas Proceedings

- Columbia Gas 2022 Green Path Rider (R-2022-3032167)
- PECO Gas 2022 1307(f) (R-2022-3032250)
- PECO Gas 2022 BRC (R-2022-3031113)
- UGI Gas 2022 BRC (R-2021-3030218)
- Columbia Gas 2022 BRC (R-2022-3031211)
- UGI Gas 2022 1307(f) (R-2022-3032242)
- Valley Gas 2022 BRC (R-2022-3032300)
- Columbia Gas 2022 1307(f) (R-2022-3031172)
- Peoples Gas 2022 1307(f) (R-2022-3030664)
- PNG 2022 1307(f) (R-2022-3030661)
- UGI Amend USECP (M-2019-3014966, P-2020-3019196)
- PNG 2023 1307(f)/ R-2023-3037928)
- PGW Supp No. 152 PA PUC No. 2 (R-2022-3034229)
- PGW 2023-20241307(f) (R-2023-3038069)
- PGW 2023 BRC (R-2023-3037933)
- Columbia Gas 2023 1307(f) (R-2023-3038630)

- PECO 2023 1307(f) (R-2023-3040285)
- PECO 2023 NGPR (P-2023-3040480)
- UGI Gas 2023 1307(f) (R-2023-3040290)
- Grays Ferry & Vicinity v PGW (C-2021-3029259)
- Leatherstocking Gas 2022 BRC (R-2022-3032764)
- PGW 2023-2027 USECP (M-2021-3029323)
- PGW 2022 WNA (P-2022-3034264)
- NFG 2022 BRC (R-2022-3035730)
- PGW DSM 2024-2026 (P-2014-2459362)
- PNG (PNG Division & PG Division) 2023 BRC (R-2023-3044549)
- NFG 2024 1307(f) (R-2024-3045177)
- PGW 2024-2025 1307(f) (R-2024-3045966)
- PNG 2024 1307(f) (R-2024-3045945)
- Columbia Gas 2024 1307(f) (R-2024-3047014)
- Columbia Gas 2024 BRC (R-2024-3046519)
- PECO Gas 2024 BRC (R-2024-3046932)
- UGI Gas 2024 Phase II EE&C (M-2024-3048418)
- NFG 2024 DSIC (P-2022-3034957)
- UGI Gas 2024 1307(f) (R-2024-3048828)
- PECO Gas 2024 1307(f) (R-2024-3048767)



Mergers & Acquisitions Overview

Approval from the PA Public Utility Commission is required before a Pennsylvania utility may be sold to, acquired by, or merged with another utility or a non-utility. In general, Commission approval is contingent upon a finding that the proposed transaction would result in affirmative benefits to the public. Specifically, Section 1102(A) of the Public Utility Code, 66 Pa. C.S. § 1102(A), requires that the Commission issue a certificate of public convenience as a legal prerequisite for the transfer or acquisition of certain property.

Enacted in 2016, Section 1329 of the Public Utility Code, 66 Pa. C.S. § 1329, added a new provision to Chapter 13 of the Code to provide how municipal or authority-owned water and wastewater systems assets are to be valued for ratemaking purposes when those assets are acquired by investor-owned water and wastewater utilities or entities. It sets forth a voluntary process for establishing a value for the acquired utility's assets using fair market value methodology rather than the original cost of construction of the facilities minus the accumulated depreciation. Under that process, the acquiring utility chooses two valuation experts from a list the PUC maintains, each of whom is to conduct an appraisal to determine fair market value in accordance with the Uniform Standards of Professional Appraisal Practice. The acquiring public utility or entity also engages a licensed engineer to assess the tangible assets of the selling utility which shall be incorporated into the appraisals.

The OSBA advocated for small businesses in 39 docketed mergers and acquisition proceedings.

Mergers & Acquisitions Statutory Representation

- Aqua 1329 Acq of DELCORA (A-2019-3015173)
- Aqua-Peoples 2018 Purchase (A-2018-3006061, 6062, 6063)
- Manwalamink & NextEra 2022 Intercompany Reorganization (A-2022-3035298, 99, 5490, 5492)
- Aqua W 1329 Acq Shenandoah (A-2022-3034143)
- Veolia 2022 Merger (A-2022-3035967 & A-2022-3035968)
- Joint App. York Water Co. & Conewago Industrial Park Water & Sewer Co. (A-2022-3036579 & A-2022-3036582)

- Veolia SUEZ WW; Water Bethel; & Water Transfer of Control (A-2021-3026515; A-2021-3026522; & 23)
- PAWC 1329 Acq BASA (A-2022-3037047)
- York Water & Conewago Industrial Park Water & Sewer (WW) (A-2023-3038862 & A-2023-3038864)
- Aqua PA WW 1329 Acq of Beaver Falls (A-2022-3033138)
- PAWC 1329 Acq of Borough of Brentwood (A-2021-3024058)
- PAWC 2023 1329 Acq of Towamencin (A-2023-3039900)
- Towamencin 1102 WW Montgomery City (A-2023-3040661)
- PAWC WW 1102 STMA (A-2023-3042058)
- PAWC 1102 Twp of Farmington (A-2023-3042567 & A-2023-3042587)
- PAWC 1102 Audubon Water Merger (A-2023-3043194 & A-2023-3043196)
- FE PA (West Penn Power 1102 LIDA) (A-2023-3043428)
- York Water 1102 Houston Run Water (A-2023-3043972 & A-2023-3043973)
- Aqua PA WW 1329 GSA (A-2023-3041695)
- PAWC 1102 MSC & MWC (A-2023-3044418, 19, 21, & 22)
- PAWC 2024 Appalachian Merger (A-2024-3046084, A-2024-3046092)
- Appalachian 2024 Stock Transfer (A-2024-3046068)



Telephone Overview

Pennsylvania no longer uses the traditional ratemaking process for the majority of telephone rate cases.

In 1993, the Legislature passed Chapter 30, Alternative Form of Regulation of Telecommunications Services, 66 Pa. C.S. Sections 3011-3019, which ended traditional rate regulation of those telecommunications services for which there was deemed to be competition. Furthermore, Chapter 30 provided for the similar deregulation of additional services if competitive markets develop.

Chapter 30 also required the local telephone company to deploy high-speed (as it was defined in 1993) broadband throughout its service area. To help pay for the broadband deployment, the utility was allowed to increase its rates for non-competitive services each year in an amount roughly equivalent to the rate of inflation, less a productivity adjustment. These annual price increases are commonly referred to as Price Change Opportunities (PCO). A 2004 state law reenacted Chapter 30 and provided for larger annual rate increases as an incentive to accelerate broadband deployment.

The current issue is determining how much a rate reduction should be provided to a telephone utility's ratepayers due to the enactment of the 2017 Tax Cut and Jobs Act (TCJA). The OSBA has successfully settled two cases involving the TCJA, but many cases remain to be resolved.

The OSBA advocated for small businesses in 33 docketed telephone proceedings.

Telephone & Broadband Proceedings

- Windstream Buffalo Valley 2022 PSI (R-2022-3031745)
- Windstream Conestoga 2022 PSI (R-2022-3031746)
- Windstream D&E 2022 PSI (R-2022-3031747)
- Windstream PA 2022 PSI (R-2022-3031748)
- Consolidated Comm 2022 PSI (R-2022-3032076)

- Rural ILECS 2018 Chapter30 PSI-SPI Filings (R-2018-3001197 etc.):
- Northeastern Pennsylvania Telephone Company (R-2018-3001197 & R-2019-3009237)
- Consolidated Communications of Pennsylvania, Inc. (R-2018-3001104 & R-2019-3009336)
- Hickory Telephone Company (R-2018-3001217)
- Lackawaxen Telecommunications Services, Inc (R-2018-3001199 & R-2019-3009233)
- Windstream Buffalo Valley, Inc. (R-2018-3001132 & R-2019-3010106)
- Windstream Conestoga, Inc. (R-2018-3001135 & R-2019-3010097)
- Windstream D&E, Inc. (R-2018-3001133 & R-2019-3010100)
- Windstream Pennsylvania, LLC (R-2018-3001150 & R-2019-3010101)
- Bentleyville Communications Corporation (R-2018-3001213 & R-2019-3009230)
- Marianna & Scenery Hill Telephone Company (R-2018-3001201 & R-2019-3009241)
- Ironton Telephone Company (R-2019-3007261 & R-2020-3016018)
- Citizens Telephone Company of Kecksburg (R-2019-3007258 & R-2020-3016016)
- TDS Telecom/Mahanoy & Mahantango Telephone Company (R-2019-3007949)
- TDS Telecom/Sugar Valley Telephone Company (R-2019-3007948)
- RLECs Arbitration & NextGen & Rural Interconnection Agmnt (P-2024-3045797 & A-2023-3043132)
- OCA & OSBA v. Frontier (C-2023-3037574)



Water, Wastewater, & Stormwater Overview

Water, wastewater, and stormwater utility rate cases normally proceed under traditional ratemaking standards.

However, the advent of 66 Pa. C.S. Section 1329 (Valuation of acquired water and wastewater systems), which is under review by the Legislature, provides a process whereby a water utility can acquire a wastewater utility, has changed the face of water litigation before the PA Public Utility Commission and Commonwealth Courts. Water utilities throughout the Commonwealth have taken advantage of the opportunity that Section 1329 affords them, and the OSBA has been very active with the resulting litigation.

The OSBA advocated for small businesses in 53 docketed water, wastewater, & stormwater proceedings.

Water, Wastewater, & Stormwater Statutory Representation

- PWSA 2018 Compliance (M-2018-2640802, 0803, P-2018-3005037, 5039)
- York WW 2022 BRC (R-2022-3032806)
- York Water 2022 BRC (R-2022-3031340)
- PAWC 2022 W & WW BRC (R-2022-3031672 & R-2022- 3031673)
- PAWC 2021 Arrearage Management (P-2021-3028195)
- Borough of Ambler 2022 BRC (R-2022-3031704)
- NEWPA 2022 WW CPCN & AIA (A-2022-3033924 & G-2022- 3033925)
- Aqua PA Water & WW 2021 BRCs (R-2021-3027385 & R-2021- 3027386)
- CUPA W & WW 2021 BRCs (R-2021-3025206 & R-2021- 3025207)
- Columbia Water 2023 BRC (R-2023-3040258)
- PWSA W, WW, & STRMWTR 2023 BRC (R-2023-3039920, R- 2023-3039921 & R-2023-3039919)
- PWSA 2023 CAC (P-2023-3040578)
- PWSA W WW DISC (P-2023-3040734, 0735)
- CAN DO 2023 W & WW BRC (R-2023-3040153 & R-2023- 3040151)
- Aqua PA WW Supp 3 to PA PUC 3 (R-2022-3037141)
- OSBA v. Aqua PA (1307 CD 2022)
- City of Lancaster 2023 LSLR (P-2023-3041043)

- Columbia Water 2023 LSLR etc. (P-2023-3041845)
- Audubon 2023 LSLR (P-2023-3041846)
- CUPA 2023 LSLR (P-2023-3041855)
- NAWC 2023 LSLR (P-2023-3041859)
- Veolia (VWPA) 2023 LSLR (P-2023-3042107)
- Conneaut 2023 BRC (R-2023-3041575)
- Conneaut 2023 Metering (P-2023-3042648)
- Nantmeal Warwick WW 2023 BRC (R-2023-3043497)
- PAWC W & WW 2023 BRC (R-2023-3043189 & R-2023-3043190)
- Aqua 3rd LTIP 2023-2027 (P-2023-3043755)
- CUPA W & WW 2023 BRC (R-2023-3042804 & R-2023-3042805)
- Aqua PA 2023 LSLR (P-2023-3044459)
- Veolia (VWPA) 2024 BRC W & WW (R-2024-3045192, R-2024-3045193)
- Rhodes & Venango (M-2023-3042180, I-2023-3042312, P-2024-3045205)
- PUMC-PWSA & Twp of Reserve (W) (U-2023-3042352)
- PUMC-PWSA & Twp of Reserve (WW) (U-2023-3042629)
- Aqua PA W & WW 2024 BRC (R-2024-3047822 & R-2024-3047824)
- City of Lock Haven Water 2024 BRC (R-2024-3049248)
- City of Lock Haven Water 2024 PENNVEST (P-2024-3049249)



Non-Certified Overview

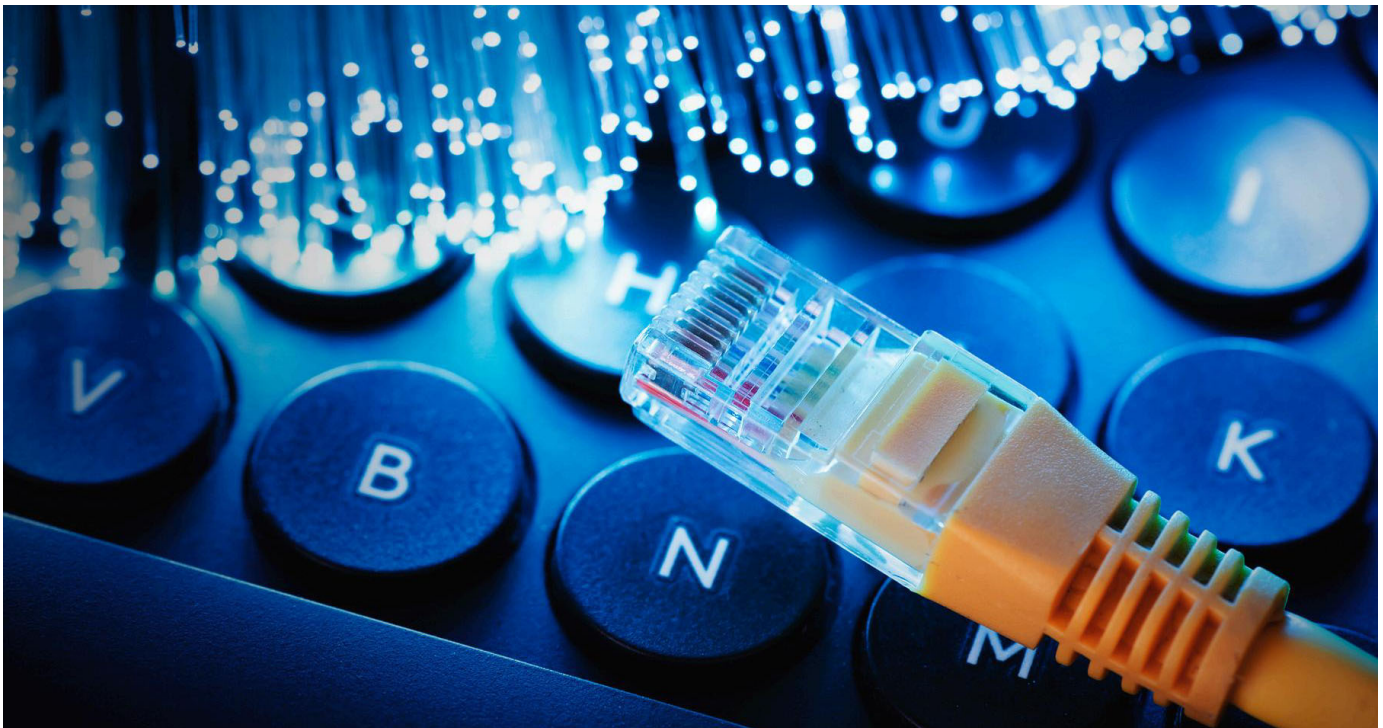
A statutory advocate, utility, state agency or others can file a request with the PA Public Utility Commission (PUC) to review or enforce a specific area of utility law and practice.

The filings listed below include: a broadband supplier's request for the PUC to decide whether it had followed all the requirements of Chapter 30 to install broadband in parts of the Commonwealth, a request to the PUC to address how utilities will use the federal funds provided by the Infrastructure Investment and Jobs Act (IIJA), and a request for various communities across the Commonwealth to become electric supply aggregators.

In the DRIVE and IIJA proceedings, the PA Public Utility Commission provided guidance and decisions on the issues. The Borough of Carlisle Petition is under current litigation before the Commission.

Non-Certified Statutory Representation

- DRIVE Declaratory Order Broadband (P-2021-3025296)
- OCA-OSBA-PULP 2022 Initiation IIJA / P-2022-3032929)
- Borough of Carlisle etc. 2024 Declaratory Order (P-2024-3049623)



Worker's Compensation Representation

The OSBA's Workers' Compensation scope of work involves a review and evaluation of, and the submission of comments on, the loss cost filings that are submitted to the Insurance Department each year by the Pennsylvania Compensation Rating Bureau (PCRB) and the Coal Mine Compensation Rating Bureau of Pennsylvania (CMCRB). The loss cost portion of a workers' compensation premium reflects the cost of paying wages for employees whose injuries prevent them from working. The loss cost portion of the premium also reflects the cost of medical care for injured workers. Individual workers' compensation insurers are not permitted to begin using the filed loss costs until the department has approved the respective bureau's filing.

Pennsylvania Compensation Rating Bureau (PCRB) Filing

After an independent analysis of the PCRB's filing for the year beginning April 1, 2024, the OSBA recommended an overall decrease of 14.22% (-14.22% change) in statewide industrial loss costs in lieu of the 7.88% decrease proposed by PCPRB (-7.88% change). Subsequently, the department approved the PCRB's request.

Coal Mine Compensation Rating Bureau of Pennsylvania (CMCRB) Filing

After an independent analysis of the CMCRB's filing for the year beginning April 1, 2024, the OSBA recommended a decrease to manual lost costs of 15.8% (15.88% change) as opposed to the 8.4% decrease proposed by CMCRB (-8.4% change). Subsequently, the department approved the CMCRB's request.