

Office of Small Business Advocate

Annual Report 2025-2026

OCTOBER 2026



Pennsylvania
Office of Small Business Advocate



Commonwealth of Pennsylvania
Josh Shapiro, Governor

Pennsylvania Office of Small Business Advocate
NazAarah Sabree, Small Business Advocate
osba.pa.gov



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Letter from the Small Business Advocate

Greetings,

It is my privilege to present the Office of Small Business Advocate's (OSBA) Annual Report for Fiscal Year 2025-2026.

Pennsylvania's 1.2 million businesses are the foundation of our economy. They create jobs, strengthen communities, and depend on energy services that are safe, reliable, equitable and affordable. The OSBA exists to ensure their voices are represented in the regulatory decisions that shape energy costs, service quality, and long-term utility planning.

Throughout this year, we remained committed to thoughtful advocacy, meaningful collaboration, and principled leadership. We represented the interests of small businesses in proceedings affecting base rates, infrastructure, grid reliability, and energy affordability. We strengthened relationships with stakeholders, expanded our outreach, and continued modernizing our office to better serve the businesses we represent.

The accomplishments highlighted in this report reflect the dedication of our staff, the collaboration of our partners, and our commitment to protecting the interests of Pennsylvania's small businesses as they navigate rising energy costs and evolving utility challenges.

Highlights from FY2025–2026 include:

Small business representation: Participated in 234 proceedings ensuring the interests of Pennsylvania's small businesses were represented.

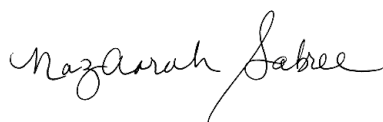
- **Delivered Measurable results:** Secured over \$88 million in cost savings for Pennsylvania's small businesses through advocacy in utility proceedings.
- **Strengthened OSBA's statewide presence:** Expanded outreach and education across the Commonwealth through regional tours, House & Senate committee testimony, panels, conferences, and community events, connecting directly with small businesses we represent.
- **Elevated the small business voice:** Conducted statewide surveys to capture feedback and experiences from small businesses, using their perspectives to inform OSBA's advocacy and engagement.
- **Expanded access to our information:** Negotiated with multiple utilities to provide bill inserts for small business customers, increasing awareness of OSBA and available resources. Advocated for programs, policies, and consumer protections: Continued advocacy to help reduce financial burdens and promote affordable and predictable utility costs for small businesses.
- **Strengthened strategic partnerships:** Collaborated with utilities, Commonwealth agencies, and legislators to expand visibility through their websites and outreach channels, increasing awareness of OSBA and its advocacy among small businesses across Pennsylvania.

As we look ahead, we will continue to provide thoughtful analysis, informed recommendations, and meaningful input on issues affecting small businesses while fostering constructive partnerships and ensuring they continue to have a strong, independent voice in the regulatory process.

Thank you for your continued partnership and trust. It is an honor to advocate on behalf of the small businesses across the Commonwealth. If you have any questions or would like to discuss our findings further, please don't hesitate to reach out.

Warm Regards,

Sincerely,



NazAarah Sabree
Small Business Advocate

About OSBA



The OSBA is an independent agency administratively situated under the Department of Community and Economic Development (DCED) representing small businesses with 250 or fewer employees in regulated utility matters before the Pennsylvania Public Utility Commission (PAPUC), state and federal regulatory agencies, and courts.

Before 1988, small businesses lacked representation in matters before the PAPUC. While residential and low-income consumers had advocates and large commercial and industrial consumers 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 OSBA, dedicated to advocating and protecting the interests of small businesses in regulated utility matters. 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. and is the only one of its kind in the nation.

Today, the OSBA advocates on behalf of 1.2 million small businesses and plays a vital role in ensuring their voices are heard, and they have a seat at the table.

OSBA Staff for FY 2025–2026



NazAarah Sabree, Small Business Advocate

Jason Flenner, Executive Director

Kiara Brown, Executive Assistant

Steven C. Gray, Senior Attorney, Assistant Small Business Advocate

Rebecca Lyttle, Attorney, Assistant Small Business Advocate

Megan I. Klemick, Director of Legal Operations

Andrew Davidson, Legal Assistant II

Eryn Ryan, Legal Assistant II

Joseph Kubas, Economic Development Consultant

OSBA 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 fiscal year. The OSBA engages in major base rate proceedings, merger, and acquisition proceedings including non-rate proceedings that would have significantly impacted small commercial and industrial consumers.

During Fiscal Year 2025–2026, the OSBA actively participated in 234 proceedings, addressing requests for overall increases totaling more than \$451.4 million.



CORE UTILITY ADVOCACY AREAS



ELECTRIC

26

PROCEEDINGS

8	Base Rate
9	Default Service Program (DSP)
4	Distribution System Improvement Charge (DSIC) / Long-Term Infrastructure Improvement Plan (LTIIP)
4	Energy Efficiency & Conservation (EE&C)
1	Distributed Energy Resources (DER)



NATURAL GAS

28

PROCEEDINGS

11	Base Rate
12	Section 1307(f)
1	Distribution System Improvement Charge (DSIC)
1	Energy Efficiency & Conservation (EE&C)
1	Universal Service and Energy Conservation Plan (USECP)
2	Other Gas



WATER, WASTEWATER & STORMWATER

92

PROCEEDINGS

17	Base Rate
4	Distribution System Improvement Charge (DSIC) / LTIIP
4	Section 529 / Investigation
42	Lead Service Line Replacement (LSLR)
7	Waiver
2	Declaratory-Order
16	Other



TELECOMMUNICATIONS

40

PROCEEDINGS

38	Section 1102 Transfer-of-Control
2	Price Stability Index (PSI)



STEAM HEAT & CHILLED WATER

3

PROCEEDINGS

1	Base Rate
2	Section 1102 Transfer-of-Control

CROSS-SECTOR ADVOCACY

MERGERS & ACQUISITIONS 42 PROCEEDINGS <table><tr><td>34</td><td>Section 1102</td></tr><tr><td>8</td><td>Section 1329</td></tr></table>	34	Section 1102	8	Section 1329	PROPOSED RULEMAKING 3 Proposed Rulemaking
34	Section 1102				
8	Section 1329				

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

- 120 Telephonic and In Person Hearings
- 72 Public Input Hearings
- 38 Prehearing and Status Conferences
- 30 Initial, Evidentiary, and Post Hearings

Additionally, 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 & Education

In addition to managing its litigation caseload, the OSBA addressed individual complaints and inquiries from small business consumers, facilitating timely resolutions. We prioritized education and outreach; while also collaborating with key stakeholders to discuss the challenges small businesses face with their utilities. Small business consumers across Pennsylvania reached out to us directly through our website, email, and hotline to seek assistance with utility-related issues.

Through these efforts, the OSBA has accomplished the following:

- Resolved small business inquiries through direct support.
- Assisted with payment arrangements, service shutoffs, billing errors, and utility overcharging issues.
- Organized meet-and-greet sessions with Economic Development Corporations, Chambers of Commerce, legislators, and other partner agencies.
- Referred consumers to partner organizations including the PA DCED Business One-Stop Shop (BOSS), Department of General Services, and respective legislators, for specialized small business support.
- Hosted pre-filing and annual reporting meetings with utilities leadership and engaged with its customer support teams to address small business consumer concerns.
- Met one-on-one with small business owners to better understand and respond to their utility needs.
- Collaborated with legislators, utilities, chambers, and associations to include the OSBA's information in newsletters, websites, and bill inserts.
- Toured water/wastewater plants to gain deeper insight into treatment processes.
- Visited a telecommunication plant to gain insight into telecommunications and the transfer of energy through powerlines.
- Attended and served as panelists at small business summits, webinars, energy conferences, and community events to educate attendees about the OSBA.

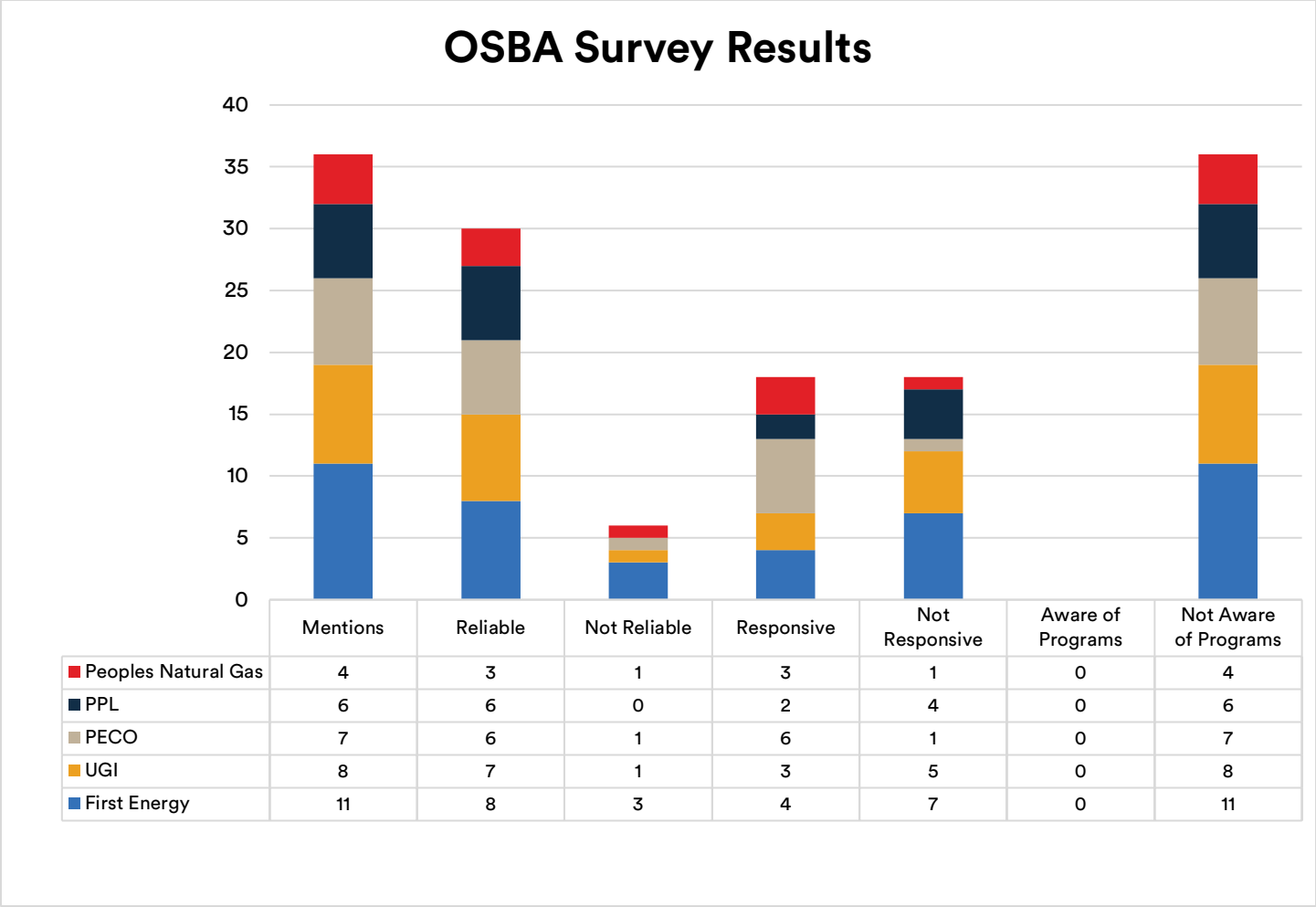


The OSBA continued its survey of small- to medium-sized commercial consumers to better understand their experiences with utility services across the Commonwealth. Feedback from participants will help inform and strengthen OSBA’s advocacy on behalf of Pennsylvania’s small business community.

Key Findings:

- **66.3%** of respondents are familiar with the OSBA.
- **Most** respondents represent businesses with 0-50 employees.
- **85.3%** of respondents consider their utility providers reliable.
- **More support requested:** participants expressed interest in additional resources, education, and OSBA-hosted events.

Total Survey Responses Collected: 36



Website Engagement:

- 5,256 unique visitors engaged with OSBA's website throughout the fiscal year.
- Visitors generated 11,179 page views and 6,004 total visits, averaging 3 minutes and 10 seconds per session.
- "Our Professional Team" was the most visited page beyond the homepage, followed closely by "Contact Us" and "Small Business Utility Resources".
- Direct visits and search engine referrals accounted for the vast majority of traffic, showing strong brand recognition and searchability.

Your Voice Matters.

The **PA Office of Small Business Advocate**
wants to hear from you!



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**SCAN
ME!**

Case Accomplishments

In the past fiscal year, OSBA's advocacy achieved over \$88 million 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.

UGI Gas Rate Case / Docket R-2024-3052716

On January 27, 2025, UGI Utilities, Inc. – Gas Division filed Supplement No. 55 to UGI Gas Tariff – Pa. P.U.C. Nos. 7 and 7S with the Commission. The rates set forth in Supplement No. 55, if approved by the Commission, would increase UGI Gas's annual jurisdictional revenues by more than \$110.3 million.

The OSBA filed a Complaint on February 7, 2025. The OSBA filed expert testimony in this case. A settlement was reached in this case. The OSBA successfully negotiated for a significant reduction in the rate increases for UGI Gas's small business customers.

The OSBA saved UGI Gas small business customers more than \$20.6 million annually.

Columbia Gas of Pennsylvania, Inc. Rate Case / Docket R-2025-3053499

On March 20, 2025, Columbia Gas of Pennsylvania, Inc. filed Supplement No. 392 to Tariff Gas Pa. P.U.C. No. 9, seeking a general rate increase. Supplement No. 392 changes Columbia's base distribution rates, and removes, revises, and adds various tariff provisions. Columbia's filing reflected an overall revenue increase of nearly \$110.5 million per year.

The OSBA filed a Complaint on April 11, 2025. The OSBA filed expert testimony in this case. The OSBA litigated this case before the Commission.

As a result of the OSBA's efforts in this case, Columbia's small business customers saved more than \$29.6 million annually.

Pittsburgh Water and Sewer Authority's Water, Wastewater, and Stormwater Rate Proceedings / Dockets R-2025-3055010; 11; & 12

On June 4, 2025, The Pittsburgh Water and Sewer Authority d/b/a Pittsburgh Water filed Supplement No. 16 Tariff Water – Pa. P.U.C. No. 1, docketed to R-2025-3055010 (Water); Supplement No. 15 Tariff Wastewater – Pa. P.U.C. No. 1, docketed to R-2025-3055011 (Wastewater); and Supplement No. 15 and Tariff Storm Water PA P.U.C. No. 1, docketed to R-2025-3055012 (Stormwater). The rates set forth in Pittsburgh Water's Tariffs, if approved by the Commission, would increase Columbia's annual revenue by approximately \$84.4 million.

The OSBA filed Complaints on June 24, 2025. The OSBA filed expert testimony in this case. A settlement was reached in this case. The OSBA successfully negotiated for a significant reduction in the rate increases for PWSA's small business customers. In addition, the OSBA obtained PWSA's commitment to expand the payment arrangement to 24 months and to provide information concerning service lines, leak programs, and a bill credit program to small business customers.

The OSBA saved Pittsburgh Water's small business customers almost \$11.5 million annually.

York Water Company's Water and Wastewater Rate Proceedings / Dockets R-2025-3053442 & R-2025-3053573

On May 30, 2025, York Water Company filed both a water and wastewater base rate case. These filings propose a general increase in water and wastewater rates of more than \$24.1 million per year.

The OSBA filed Complaints on June 18, 2025. The OSBA filed expert testimony in this case. A partial settlement was reached in this case. The OSBA successfully negotiated for a significant reduction in the rate increases for UGI Gas's small business customers. The OSBA also obtained an agreement with York Water that the company will conduct a detailed study of customer water usage.

The OSBA saved York Water's small business customers nearly \$2.6 million annually.

Energy Center Harrisburg LLC Rate Case / Docket R-2025-3055959

On July 18, 2025, Energy Center Harrisburg LLC filed proposed Supplement No. 66 to Tariff Steam – PA PUC No. 4. Tariff No. 4, if approved by the Commission, would increase Energy Center Harrisburg LLC's annual distribution revenues by \$894,300.

The OSBA filed a Complaint on August 8, 2025.

The OSBA's advocacy in this case kept Energy Center Harrisburg LLC in business and continuing to serve the company's small business customers.

Philadelphia Gas Works (PGW) 2025 Rate case / Docket R-2025-3053112

On February 27, 2025, Philadelphia Gas Works filed for a \$105 million annual increase in its natural gas distribution rates.

The OSBA filed expert testimony in this case. A settlement was reached in this case. The OSBA successfully negotiated for a significant reduction in the rate increases for PGWS's small business customers. In addition, the OSBA obtained PGW's commitment to expand the payment arrangement to 24 months and to provide information concerning service lines, leak programs, and a bill credit program to small business customers.

The OSBA saved PGW's small business customers more than \$22.5 million annually.

Pike County Light & Power Company Electric Rate Case / Docket R-2024-3052359

On January 14, 2025, Pike County Light & Power Company filed for a more than \$1.87 million annual increase in its electric distribution rates.

OSBA filed a Protest in opposition to the Pike filing on March 4, 2024. The OSBA filed expert testimony in this case. The OSBA opposed the non-Unanimous Settlement and litigated this case before the Commission.

As a result of the OSBA's efforts in this case, Pike County's small business electric customers saved \$33,564.41 annually.

Citizens' Electric Company of Lewisburg, PA Base Rate Case / Docket R-2025-3054394

On April 30, 2025, the Citizens' Electric Company of Lewisburg, PA filed for a more than \$1.79 million annual increase in its electric distribution rates.

The OSBA filed a Complaint on May 14, 2025. The OSBA filed expert testimony in this case. The OSBA successfully negotiated a significant reduction in the rate increase for Citizens' small business customers. In addition, the OSBA negotiated to get contact information for the OSBA in Citizens' newsletter or bill insert every year. Also, the OSBA information will be added to the Company website with a hyperlink.

Ultimately, the OSBA saved Citizen's small business electric customers \$243,710.00 annually.

Wellsboro Rate Case / Docket R-2025-3054392

On April 30, 2025, Wellsboro Electric Company filed for a \$2,899,388 annual increase in its electric distribution rates.

The OSBA filed a Complaint on May 14, 2025. The OSBA filed expert testimony in this case. The OSBA successfully negotiated a significant reduction in the rate increase for Citizens' small business customers. In addition, the OSBA negotiated to get contact information for the OSBA in Wellsboro's newsletter or bill insert every year. Also, the OSBA information will be added to the Company website with a hyperlink.

Ultimately, the OSBA saved Wellsboro Electric's small business customers \$313,491.00 annually.

Pike County Light & Power Company Gas Rate Case / Docket R-2024-3052357

On December 30, 2024, Pike County Light & Power Company filed a \$905,900 annual increase in its natural gas distribution rates.

The OSBA filed a Complaint on January 16, 2025. The OSBA filed expert testimony in this case. The OSBA opposed the non-Unanimous Settlement and litigated this case before the Commission.

As a result of the OSBA's efforts in this case, saved Pike County's small business gas customers saved \$27,892.65 annually.

Valley Energy, Inc. Gas Rate Case / Docket R-2025-3054393

On April 30, 2025, Valley Energy, Inc. filed for a \$1.6 million annual increase in its natural gas distribution rates.

The OSBA filed a Complaint on May 14, 2025. The OSBA filed expert testimony in this case. The OSBA successfully negotiated a significant reduction in the rate increase for Valley's small business customers.

The OSBA saved Valley Energy's small business customers \$213,638 annually.

City of Lancaster – Bureau of Water Rate Case / Docket R-2025-3057237

On September 30, 2025, City of Lancaster – Bureau of Water filed for a more than \$7 million annual increase in its water rates.

The OSBA filed a Complaint on October 10, 2025. The OSBA filed expert testimony in this case. The OSBA successfully negotiated a significant reduction in the rate increase for the City of Lancaster's small business customers. The OSBA also negotiated that the city will assess and report about offering an arrearage management plan for commercial customers. The OSBA also confirmed the City's commitment to actively review customer accounts that are in default and to have the city proactively reach out to those small business customers.

The OSBA saved the City of Lancaster's small business customers \$576,304.25 annually.

Rate Proceedings

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

The OSBA represented small businesses in 26 electric proceedings.

Electric Proceedings:

- Duquesne 2024 BRC (R-2024-3046523)
- PECO Electric 2024 BRC (R-2024-3046931)
- Pike Electric 2024 BRC (R-2024-3052359)
- Wellsboro 2025 BRC (R-2025-3054392)
- Citizens 2025 BRC (R-2025-3054394)
- PPL 2025 BRC (R-2025-3057164)
- UGI Electric 2026 BRC (R-2025-3059430)
- PECO Electric 2026 BRC (R-2026-3060859)
- PECO DSP VI 2025–2029 (P-2024-3046008)
- PPL 2025–2029 DSP VI (P-2024-3047290)
- Duquesne 2025–2029 DSP X (P-2024-3048592)
- UGI Electric DSP V 2025–2029 (P-2024-3049343)
- UGI Electric DSP AIA (G-2024-3049351)
- Pike County 2026 Modify DSP (P-2023-3039927)
- FE PA 2026 DSP (P-2026-3060298)
- Pike County Electric 2026 DSP (P-2026-3062915)
- Pike County Electric 2026 DSP (P-2026-3062916)
- FirstEnergy DSIC & LTIPs (P-2015-2508931)
- FirstEnergy DSIC & LTIPs (P-2015-2508936)
- FirstEnergy DSIC & LTIPs (P-2015-2508942)
- FirstEnergy DSIC & LTIPs (P-2015-2508948)

- Duquesne 2025 Phase V EE&C (M-2025-3057325)
- FirstEnergy 2025 Phase V EE&C (M-2025-3057327)
- PECO 2025 Phase V EE&C (M-2025-3057328)
- PPL 2025 Phase V EE&C (M-2025-3057329)
- PPL Electric 2024 Second DER (P-2024-3049223)

Gas Overview

The rates charged by a Natural Gas Distribution Company (NGDC) include both the cost of the gas and the cost of delivering, i.e., 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 represented small businesses in 28 gas proceedings.

Gas Proceedings:

- PECO Gas 2024 BRC (R-2024-3046932)
- Pike Gas 2024 BRC (R-2024-3052357)
- UGI Gas 2025 BRC (R-2024-3052716)
- PGW 2025 BRC (R-2025-3053112)
- Columbia Gas 2025 BRC (R-2025-3053499)
- Valley 2025 BRC (R-2025-3054393)
- NFG 2026 BRC (R-2025-3059428)
- UGI Gas 2026 BRC (R-2025-3059523)
- PNG 2026 BRC (R-2026-3060855)
- PECO Gas 2026 BRC (R-2026-3060860)
- PGW 2023 BRC (R-2023-3037933)
- NFG 2025 1307(f) (R-2025-3052742)
- PNG 2025 1307(f) (R-2025-3053184)
- PGW 2025 1307(f) (R-2025-3053241)
- Columbia Gas 2025 1307(f) (R-2025-3053663)
- PECO Gas 2025 1307(f) (R-2025-3054868)
- UGI Gas 2025 1307(f) (R-2025-3054938)
- NFG 2026 1307(f) (R-2026-3059551)
- PNG 2026 1307(f) (R-2026-3060165)
- PGW 2026 1307(f) (R-2026-3060186)
- Columbia Gas 2026 1307(f) (R-2026-3060762)
- PECO Gas 2026 1307(f) (R-2026-3062148)
- UGI Gas 2026 1307(f) (R-2026-3062192)
- PGW 2025 DSIC (P-2025-3053659)
- UGI Gas 2024 Phase II EE&C (M-2024-3048418)
- PGW 2023–2027 USECP (M-2021-3029323)
- Gas-On-Gas Competition (P-2011-2277868)
- Gas-On-Gas Competition (I-2012-2320323)

Mergers and Acquisitions Overview

Approval from the PUC 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 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 represented small businesses in 42 mergers and acquisition proceedings.

Mergers and Acquisitions Proceedings:

- PAWC 1102 Audubon Water Merger (A-2023-3043194)
- PAWC 1102 Audubon Water Merger (A-2023-3043196)
- FE PA / West Penn Power 1102 LIDA (A-2023-3043428)
- PAWC 1102 MSC & MWC (A-2023-3044418)
- PAWC 1102 MSC & MWC (A-2023-3044419)
- PAWC 1102 MSC & MWC (A-2023-3044421)
- PAWC 1102 MSC & MWC (A-2023-3044422)
- PAWC 2024 Appalachian Merger (A-2024-3046084)
- PAWC 2024 Appalachian Merger (A-2024-3046092)
- Appalachian 2024 Stock Transfer (A-2024-3046068)
- The York Water Company 1102 Margaretta WW (A-2024-3049695)
- Aqua PA 1102 Honesdale Merger (A-2024-3049920)
- Aqua PA 1102 Honesdale Merger (A-2024-3049921)
- PAWC Transfer of Corner Water (A-2025-3052745)
- PAWC Transfer of Corner Water (A-2025-3052747)
- Aqua PA WW 1102 Breyer (A-2025-3054123)
- Pike & Leatherstocking 2025 Change of Control (A-2025-3055264)
- Pike & Leatherstocking 2025 Change of Control (A-2025-3055265)
- Pike & Leatherstocking 2025 Change of Control (A-2025-3055335)
- PAWC & CUPA 2025 Transfer of Control (A-2025-3055551)
- PAWC & CUPA 2025 Transfer of Control (A-2025-3055552)
- PAWC & CUPA 2025 Transfer of Control (A-2025-3055553)
- PAWC & CUPA 2025 Transfer of Control (A-2025-3055554)
- Mainlines, Manholes & Wastewater 2024 (A-2024-3050786)
- PAWC 2024 Salem Township (A-2024-3051136)
- PAWC WW 1102 SSMSA (A-2025-3056563)
- PNG & PNG Gathering 2025 Merger (A-2025-3056882)
- Deer Haven 1102 Pocono Lakefront (A-2025-3057204)
- NFG 2025 1102 NEHL (A-2025-3057864)
- NFG 2025 1102 NEHL (A-2025-3057865)
- American Water & Essential 2025 Merger (A-2025-3058927)
- American Water & Essential 2025 Merger (A-2025-3058928)
- American Water & Essential 2025 Merger (A-2025-3058929)
- Aqua 2026 1102 UMA (A-2026-3060010)
- Aqua 1329 Acquisition of DELCORA (A-2019-3015173)
- Aqua PA WW 1329 Acquisition of Beaver Falls (A-2022-3033138)
- Aqua PA WW 1329 GSA (A-2023-3041695)

- PAWC 2025 WW 1329 EBMA (A-2025-3052983)
- Aqua PA 1329 GWA (A-2024-3049015)
- PAWC 2025 WW 1329 East Coventry (A-2025-3053487)
- PAWC 1329 ICVWA 2025 (A-2025-3055741)
- PAWC 1329 Acquisition of City of Pittston (A-2025-3056419)

Telephone Overview

Pennsylvania no longer uses the traditional ratemaking process for many of the telephone rate proceedings.

In 1993, the Legislature passed Chapter 30, which ended traditional rate regulation of those telecommunications services for which there was deemed to be competition. Furthermore, Chapter 30 provided for a similar deregulation of additional services if competitive markets develop.

Chapter 30 also required the local telephone company to deploy high speed (as 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 productivity adjustment. These annual price increases are commonly referred to as Price Change Opportunities, or PCOs. 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 proceedings involving the TCJA, but many proceedings remain to be resolved.

The OSBA represented small businesses in 40 of telephone proceedings.

Telephone and Broadband Proceedings:

- Verizon & Frontier 2024 Transfer of Control (1102) (A-2024-3051925, 26, 27, 29, 31, 32, 33, 34, 35 & 36)
- ARC Networks Transfer of Control (1102) (A-2025-3054226, 27, 28, 29, 32, 34, 40, 44, 46, 47, 48, 50, 51, 53, 56, 57, 58, 59, 61, 62, 63, 64, 65, 66, 67, 68, 69, & 70)
- Consolidated Comm 2025 PSI (R-2025-3054669)
- Consolidated Comm 2026 PSI (R-2026-3062084)

Water and Wastewater Overview

Water utility rate proceedings, as well as wastewater utility rate proceedings, normally proceed under traditional ratemaking standards.

However, the advent of Section 1329 which is under review by the Legislature, which provides a process whereby a water utility can acquire a wastewater utility, has changed the face of water litigation before the PUC and Commonwealth Courts. Water utilities throughout the

The Commonwealth has taken advantage of the opportunity that Section 1329 affords them, and the OSBA has been very active with the resulting litigation.

The OSBA represented small businesses in 92 water and wastewater proceedings.

Water and Wastewater Proceedings:

- Aqua PA Water & Wastewater 2021 BRC (R-2021-3027385)
- Aqua PA Water & Wastewater 2021 BRC (R-2021-3027386)
- Nantmeal Warwick Wastewater 2023 BRC (R-2023-3043497)
- Veolia / VWPA 2024 BRC — Water (R-2024-3045192)
- Veolia / VWPA 2024 BRC — Wastewater (R-2024-3045193)
- City of Lock Haven Water 2024 BRC (R-2024-3049248)
- NAWCO 2024 BRC (R-2024-3050208)
- Audubon Water Company 2024 BRC (R-2024-3051816)
- PWSA Water, Wastewater & Stormwater 2025 BRC (R-2025-3055010)
- PWSA Water, Wastewater & Stormwater 2025 BRC (R-2025-3055011)

- PWSA Water, Wastewater & Stormwater 2025 BRC (R-2025-3055012)
- York Water & Wastewater 2025 BRC (R-2025-3053442)
- York Water & Wastewater 2025 BRC (R-2025-3053573)
- City of Lancaster 2025 BRC (R-2025-3057237)
- PAWC Water & Wastewater 2025 BRC (R-2025-3057983)
- PAWC Water & Wastewater 2025 BRC (R-2025-3058051)
- Montgomery Sewer 2026 BRC (R-2026-3061282)
- Aqua Third LTIP 2023–2027 (P-2023-3043755)
- PWSA Water & Wastewater 2025 DSIC (P-2025-3055650)
- PWSA Water & Wastewater 2025 DSIC (P-2025-3055652)
- York Water 2026 Deferred Expenses WCCDS (P-2026-3062819)
- I&E Section 529 Investigation — Rock Spring (P-2024-3051313)
- I&E Section 529 Investigation — Conneaut (P-2024-3051855)
- I&E Section 529 Investigation — Conneaut (I-2024-3051857)
- Section 529 Acquisition of Wonderview Water & Wastewater (M-2025-3053936)
- City of Lancaster 2023 LSLR (P-2023-3041043)
- Columbia Water 2023 LSLR (P-2023-3041845)
- CUPA 2023 LSLR (P-2023-3041855)
- NAWC 2023 LSLR (P-2023-3041859)
- Veolia / VWPA 2023 LSLR (P-2023-3042107)
- Aqua PA 2023 LSLR (P-2023-3044459)
- Quakertown Borough 2024 LSLR (P-2024-3050121)
- Templeton Water 2024 LSLR (P-2024-3050145)
- Dover Borough 2024 LSLR (P-2024-3050162)
- City of Lock Haven 2024 LSLR (P-2024-3050183)
- Evitts Creek Water 2024 LSLR (P-2024-3050185)
- Port Matilda Water 2024 LSLR (P-2024-3050187)
- Boro of Hanover 2024 LSLR (P-2024-3050231)
- Valley View Water 2024 LSLR (P-2024-3050234)
- Boro of Schuylkill Haven 2024 LSLR (P-2024-3050239)
- Venango Water 2024 LSLR (P-2024-3050248)
- Twin Lakes 2024 LSLR (P-2024-3050254)
- PAWC 2024 LSLR (P-2024-3050263)
- Boro of Ambler 2024 LSLR (P-2024-3050266)
- City of DuBois 2024 LSLR (P-2024-3050267)
- Deer Haven 2024 LSLR (P-2024-3050268)
- York Water 2024 LSLR (P-2024-3050273)
- City of Bethlehem 2024 LSLR (P-2024-3050282)
- Boro of Chambersburg 2024 LSLR (P-2024-3050284)
- Reynolds Water 2024 LSLR (P-2024-3050287)
- Tri-Valley Water 2024 LSLR (P-2024-3049888)
- Elverson Water 2024 LSLR (P-2024-3050472)
- Corner Water 2025 LSLR (P-2025-3053395)
- Artesian Water 2025 LSLR (P-2025-3053424)
- Manwalamink 2025 LSLR (P-2025-3053476)
- RDC 2025 LSLR (P-2025-3053478)
- Audubon 2025 LSLR (P-2025-3053483)
- Aqua PA 2025 LSLR (P-2025-3053500)
- Eaton Sewer & Water 2025 LSLR (P-2025-3053506)
- Richland Borough 2025 LSLR (P-2025-3053519)
- Duncannon Borough 2025 LSLR (P-2025-3053534)
- Emporium 2025 LSLR (P-2025-3053535)
- Buck Hill 2025 LSLR (P-2025-3053570)
- Boro of Saint Petersburg 2025 LSLR (P-2025-3053668)
- Acorn 2025 LSLR (P-2025-3053735)

- Garrett Borough 2025 LSLR (P-2025-3053763)
- PAWC Water & Wastewater 2024 Limited Waiver (P-2024-3051518)
- PAWC Water & Wastewater 2024 Limited Waiver (P-2024-3051519)
- Manwalamink 2025 Waiver (P-2025-3054627)
- Acorn 2025 Waiver (P-2025-3054928)
- PWSA 2025 Water, Wastewater & Stormwater Waiver FPFTY (P-2025-3055587)
- PWSA 2025 Water, Wastewater & Stormwater Waiver FPFTY (P-2025-3055588)
- PWSA 2025 Water, Wastewater & Stormwater Waiver FPFTY (P-2025-3055589)
- The York Water Company Declaratory Order (P-2024-3052732)
- Borough of Richland Declaratory Order (P-2025-3054182)
- OSBA v. PUC / Aqua PA Water & Wastewater 2021 BRCs (722 MAL 2025)
- OSBA v. PUC / Aqua PA Water & Wastewater 2021 BRCs (723 MAL 2025)
- OSBA v. PUC / Aqua PA Water & Wastewater 2021 BRCs (724 MAL 2025)
- Rhodes & Venango (M-2023-3042180)
- Rhodes & Venango (I-2023-3042312)
- Rhodes & Venango (P-2024-3045205)
- City of Lock Haven Water 2024 PENNVEST (P-2024-3049249)
- Beryl Acres Sewage Abandonment (A-2024-3050730)
- Deer Haven Emergency Order — Water & Wastewater (P-2024-3050545)
- Deer Haven Emergency Order — Water & Wastewater (P-2024-3050549)
- Deer Haven Emergency Order — Water & Wastewater (I-2024-3051540)
- Deer Haven Emergency Order — Water & Wastewater (I-2024-3051541)
- PAWC 2025 PFAS (R-2025-3057687)
- NAWC 2026 PWAC (M-2026-3061300)
- OSBA v. Veolia / OCA v. Veolia (C-2025-3058757)
- OSBA v. Veolia / OCA v. Veolia (C-2025-3058865)

Steamed Heat & Chilled Water Proceedings:

The OSBA represented small businesses in 3 Steamed Heat & Chilled Water proceedings.

- ECH 2025 BRC (R-2025-3055959)
- ECH 2026 Transfer of Control (1102) (A-2026-3061723 & 24)

Proposed Rulemaking Dockets Proceedings:

- {C-R} Rulemaking Further Amend Chapter 56-Chapter 14 (L-2025-3058767)
- {C-R} Potential Regs Interconnecting Loads (L-2025-3059032)
- {C-R} DER Participation Wholesale Markets Chapter 57 (L-2023-3044115)

Non-Certified Overview

Frequently, a statutory advocate, utility, or state agency will file a request with the PUC to review a specific area of utility law and practice.

Three examples, provided below, include the request of a broadband supplier for the PUC to decide whether it has followed all the requirements of Chapter 30 to install broadband in parts of the Commonwealth.

The second example is a request to the PUC to address how utilities will use the federal funds provided by the Infrastructure Investment and Jobs Act (IIJA).

In these proceedings, the PUC provided guidance and decisions on the issues.

OSBA Non-Certified Statutory Representation:

- OCA-OSBA-PULP 2022 Initiation IIJA (P-2022-3032929)
- Boro of Carlisle etc. 2024 Declaratory Order (P-2024-3049623)

Worker's Compensation Representation

The OSBA's work in the workers' compensation arena includes reviewing, evaluating, and submitting comments on annual loss cost filings submitted to the Pennsylvania Insurance Department by the Pennsylvania Compensation Rating Bureau (PCRB) and the Coal Mine Compensation Rating Bureau of Pennsylvania (CMCRB).

Loss costs represent the portion of a workers' compensation premium attributable to indemnity benefits, wage replacement for employees unable to work due to injury, as well as medical expenses for treatment of work-related injuries.

Insurers are prohibited from applying these filed loss costs until the Insurance Department has reviewed and approved the respective bureau's submission.

Pennsylvania Compensation Rating Bureau's (PCRB) Filing

After an independent analysis of the PCRB's filing for the year beginning April 1, 2026, the OSBA recommended an overall decrease of 5.21% (-5.21% change) in statewide industrial loss costs in lieu of the 1.22% (-1.22% change) decrease recommended in the filing. Subsequently, the department approved PCRB's request.

Coal Mine Compensation Rating Bureau's (CMCRB) Filing

After an independent analysis of the CMCRB's filing for the year beginning April 1, 2026, the OSBA recommended a 16% (-16% change) decrease to manual loss costs as opposed to the 11.9% (-11.9% change) decrease proposed by CMCRB. Subsequently, the department approved CMCRB's request.



Commonwealth of Pennsylvania

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