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**VIA ELECTRONIC FILING**

June 1, 2017

Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street  
Harrisburg, PA 17105-3265

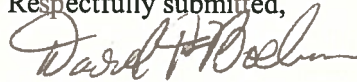
*Re: Pennsylvania Public Utility Commission v. Pennsylvania-American Water Company  
Docket No. R-2017-2595853*

Dear Secretary Chiavetta:

Please find enclosed the PETITION TO INTERVENE OF AK STEEL CORPORATION for filing in the above-captioned proceeding.

By copy of this letter, all parties listed on the Certificate of Service have been served.

Respectfully submitted,



David F. Boehm, Esq. (PA Attorney I.D. # 72752)  
**BOEHM, KURTZ & LOWRY**

**COUNSEL FOR AK STEEL CORPORATION**

DFBkew  
Enclosure

cc: Certificate of Service  
ALJ Dennis J. Buckley – [debuckley@pa.gov](mailto:debuckley@pa.gov)  
ALJ Benjamin J. Myers – [benmyers@pa.gov](mailto:benmyers@pa.gov)  
VIA EMAIL AND OVERNIGHT MAIL  
Pa. Public Utility Commission  
P.O. Box 3265  
Harrisburg, PA 17105

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission	:	
vs.	:	
Pennsylvania American Water Company	:	Docket No. R-2017-2595853

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**PETITION TO INTERVENE OF  
AK STEEL CORPORATION**

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AK Steel Corporation (“AK Steel”) by its counsel hereby files the instant Petition to Intervene in response to the Petition of Pennsylvania American Water Company (“PAWC” or “Company”) pursuant to 52 Pa. Code §§ 5.71 – 5.74. In support of its Petition, AK Steel represents the following:

1. The Petitioner is:

**AK Steel Corporation**

2. The name and address of Petitioner’s attorneys are:

David F. Boehm, Esq. (PA Attorney I.D. # 72752)  
Michael L. Kurtz, Esq.  
**Boehm, Kurtz & Lowry**  
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3. Respondent utility is:

Pennsylvania American Water Company  
800 West Hersheypark Drive  
Hershey, PA 17033

4. By its filing in the above captioned proceeding, the Company has requested an annual increase in its water and waste water rates of \$107.9 million, or 16.4% of the Company's annual revenues.

5. AK Steel is the largest industrial customer on the Company's system. The rates paid by AK Steel for water service will be significantly affected if the Commission approves the rate increase requested herein. Therefore, AK Steel has a direct and substantial interest in the Commission's determination in this matter. AK Steel's interest cannot adequately be represented by any other party to this proceeding.

6. AK Steel alleges that the information filed in support of the Company's proposed rate increase is insufficient to establish that the rates to be collected are just and reasonable. AK Steel also alleges that the rate structure proposed by the Company may result in large industrial customers subsidizing other rate classes.

7. Since the prehearing conference in this case has already been held, AK Steel agrees to abide by the terms and the schedule to be set forth in the ALJ's Prehearing Order.

**WHEREFORE**, for the reasons stated above, AK Steel respectfully requests that its Petition to Intervene be granted and that it be afforded full party status in this proceeding.

Respectfully submitted,



David F. Boehm, Esq. (PA Attorney I.D. # 72752)

Michael L. Kurtz, Esq.

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June 1, 2017

**ATTORNEYS FOR AK STEEL CORPORATION**

**VERIFICATION**

STATE OF OHIO                            )  
  )  
COUNTY OF HAMILTON                )        SS:

I, DAVID F. BOEHM, being duly sworn and according to law, deposes and says that he is Counsel for AK Steel Corporation, and, that in this capacity, he is authorized to and does make this verification for them, and that the facts set forth in the foregoing document are true and correct to the best of his knowledge, information and belief.

  
\_\_\_\_\_  
DAVID F. BOEHM, ESQ.

SWORN to me and subscribed  
before me, a notary public  
and for the State of Ohio  
this   1   day of June, 2017.


  
\_\_\_\_\_  
Notary Public



**Kimberly Walton**  
Notary Public, State of Ohio  
My Commission Expires 08-28-2019

## CERTIFICATE OF SERVICE

I hereby certify that on this 1<sup>st</sup> day of June, 2017 I served a true copy of the PETITION TO INTERVENE OF AK STEEL CORPORATION on the following persons listed on the attached Certificate of Service in the matter specified in accordance with the requirements of 52 Pa. Code §1.54:

  
\_\_\_\_\_  
David F. Boehm, Esq. (PA Attorney I.D. # 72752)  
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