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January 22, 2019

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor
Harrisburg, PA 17120

VIA ELECTRONIC FILING

RE: Application and related filings of Pennsylvania-American Water Company under Sections 507, 1102(a), and 1329 of the Pennsylvania Public Utility Code, 66 Pa. C.S. §§ 507, 1102(a), 1329, for approval of its acquisition of water system assets of the Steelton Borough Authority, related water service rights, fair market valuation ratemaking treatment, deferral of the post-acquisition improvement costs, and certain contracts with municipal corporations; Docket No. A-2019-3006880, et al.

Dear Secretary Chiavetta:

Enclosed for filing with the Pennsylvania Public Utility Commission is the Petition to Intervene of the Steelton Borough Authority in the above-referenced proceeding.

As shown by the attached Certificate of Service, all parties to this proceeding are being duly served. Thank you.

Sincerely,

McNEES WALLACE & NURICK LLC

By

A handwritten signature in black ink that reads 'Alessandra L. Hylander'.

Alessandra L. Hylander

Counsel to the Steelton Borough Authority

c: Chief Administrative Law Judge Charles E. Rainey, Jr. (via E-Mail and First-Class Mail)
Certificate of Service

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CERTIFICATE OF SERVICE

I hereby certify that I am this day serving a true copy of the foregoing document upon the participants listed below in accordance with the requirements of Section 1.54 (relating to service by a participant).

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Alessandra L. Hylander

Counsel to the Steelton Borough Authority

Dated this 22nd day of January, 2019, in Harrisburg, Pennsylvania.

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Application and related filings of Pennsylvania- :
American Water Company under Sections 507, : Docket No. A-2019-3006880, *et al.*
1102(a), and 1329 of the Pennsylvania Public :
Utility Code, 66 Pa. C.S. §§ 507, 1102(a), 1329, :
for approval of its acquisition of water system :
assets of the Steelton Borough Authority, related :
water service rights, fair market valuation :
ratemaking treatment, deferral of the post- :
acquisition improvement costs, and certain :
contracts with municipal corporations. :

PETITION TO INTERVENE OF THE STEELTON BOROUGH AUTHORITY

TO THE HONORABLE, THE PENNSYLVANIA PUBLIC UTILITY COMMISSION:

Pursuant to the provisions of 52 Pa. Code § 5.71, *et seq.*, the Steelton Borough Authority ("Steelton") hereby files this Petition to Intervene in the above-captioned proceeding. In support thereof, Steelton states as follows:

1. Petitioner, Steelton, is a party interested in the above-captioned docket, as it is a party to the agreement under which Pennsylvania-American Water Company ("PAWC") seeks approval to acquire the water system assets of Steelton.

2. The names and address of Petitioner's attorneys are:

Kathy L. Pape (Pa. I.D. 28027)
Adeolu A. Bakare (Pa. I.D. 208541)
Alessandra L. Hylander (Pa. I.D. 320967)
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3. On January 2, 2019, PAWC submitted the above-captioned Application with the Pennsylvania Public Utility Commission ("PUC" or "Commission") pursuant to 66 Pa. C.S. §§ 507, 1102(a), and 1329.

4. Steelton supports the Application filed by PAWC at this docket.

5. 52 Pa. Code § 5.72(a) provides the eligibility requirements for a party to intervene in a proceeding and indicates, in relevant part, as follows:

(a) Persons. A petition to intervene may be filed by a person claiming a right to intervene or an interest of such nature that intervention is necessary or appropriate to the administration of the statute under which the proceeding is brought. The right or interest may be one of the following:

- (1) A right conferred by statute of the United States or of the Commonwealth.
- (2) An interest which may be directly affected and which is not adequately represented by existing participants, and as to which the petitioner may be bound by the action of the Commission in the proceeding.
- (3) Another interest of such nature that participation of the petitioner may be in the public interest.

6. Consistent with 52 Pa. Code § 5.72(a), Steelton has a significant interest in this proceeding that is not represented by any other party of record and cannot be represented or protected adequately by other existing parties to this docket. *See* 52 Pa. Code § 5.72(a). Steelton seeks to intervene in this proceeding for due cause shown as it is the owner of the water system assets proposed for sale to PAWC.

7. As the potential seller of the water system assets, Steelton submits that it is an indispensable party to this Application and that its intervention is in the public interest.

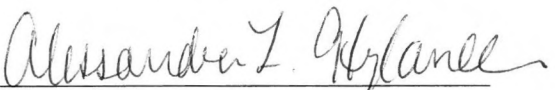
8. Steelton intends to play an active role in the Commission's decision-making process regarding this Application. Steelton's participation in this matter will not unduly prejudice any party. Further, PAWC's Application anticipates Steelton's intervention and participation in this proceeding. *See* Application, at 12 n.3.

9. For the reasons set forth above, the Commission should grant Steelton intervenor status in this proceeding.

WHEREFORE, the Steelton Borough Authority respectfully requests that the Pennsylvania Public Utility Commission grant this Petition to Intervene in the above-captioned proceeding.

Respectfully submitted,

McNEES WALLACE & NURICK LLC

By 

Kathy L. Pape (Pa. I.D. 28027)

Adeolu A. Bakare (Pa. I.D. 208541)

Alessandra L. Hylander (Pa. I.D. 320967)

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Counsel to the Steelton Borough Authority

Dated: January 22, 2019

