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VIA eFILING

June 2, 2020

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 Nos. R-2020-3019369 and R-2020-3019371*

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,

/s/ Michael L. Kurtz
Michael L. Kurtz, Esq.. (PA Attorney I.D. #71687)
Kurt J. Boehm, Esq.
Jody Kyler Cohn, Esq.
BOEHM, KURTZ & LOWRY
COUNSEL FOR AK STEEL CORPORATION

MLKkew

cc: The Honorable Charles E. Rainey, Jr. (email only crainey@pa.gov)
The Honorable Conrad A. Johnson (email only cjohnson@pa.gov)
Certificate of Service

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission	:	
vs.	:	
Pennsylvania American Water Company	:	Docket Nos. R-2020-3019369 (Water) R-2020-3019371 (Wastewater)

**PETITION TO INTERVENE OF
AK STEEL CORPORATION**

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:

Michael L. Kurtz, Esq. (PA Attorney I.D. #71687)

Kurt J. Boehm, Esq.

Jody Kyler Cohn, Eq.

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3. Respondent utility is:

Pennsylvania American Water Company

800 West Hersheypark Drive

Hershey, PA 17033

4. AK Steel consents to the service of documents by electronic mail to mkurtz@bkllawfirm.com, kboehm@bkllawfirm.com and jkylercohn@bkllawfirm.com, as provided in 52 Pa. Code § 1.54(b)(3).

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. PAWC proposes to increase its rates by \$138.6 million over two years. 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 other rate classes.

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,



Michael L. Kurtz, Esq. (PA Attorney I.D. #71687)

Kurt J. Boehm, Esq.

Jody Kyler Cohn, Esq.

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June 2, 2020

ATTORNEYS FOR AK STEEL CORPORATION

VERIFICATION


STATE OF OHIO)
)
COUNTY OF HAMILTON) SS:

I, MICHAEL L., KURTZ, 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.



Michael L. Kurtz, Esq.

SWORN to me and subscribed
before me, a notary public
and for the State of Ohio
this 2 day of June, 2020.


KIMBERLY E. NONELLE
Notary Public, State of Ohio
My Commission Expires 08-28-2024

CERTIFICATE OF SERVICE

I hereby certify that on this 2nd day of June, 2020 I served a true copy of the PETITION TO INTERVENE OF AK STEEL CORPORATION via email only upon the parties of record in this proceeding in accordance with the requirements of 52 Pa. Code §1.54:

/s/ Michael L. Kurtz

Michael L. Kurtz, Esq. (PA Attorney I.D. # 71687)

Kurt J. Boehm, Esq.

Jody Kyler Cohn, Esq.

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