

COMMONWEALTH OF PENNSYLVANIA



OFFICE OF CONSUMER ADVOCATE

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July 25, 2018

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

Re: Pennsylvania-American Water Company-  
Wastewater Division Supplement No. 6 to  
Tariff Wastewater-Pa. P.U.C. No. 16  
Docket No. R-2018-3002504

Dear Secretary Chiavetta:

Attached for electronic filing please find the Office of Consumer Advocate's Notice of Intervention and Public Statement in the above-referenced proceeding.

Copies have been served per the attached Certificate of Service.

Very truly yours,

/s/ Christine Maloni Hoover  
Christine Maloni Hoover  
Senior Assistant Consumer Advocate  
PA Attorney I.D. # 50026  
E-Mail: [CHoover@paoca.org](mailto:CHoover@paoca.org)

Attachment

cc: Office of Administrative Law Judge  
Certificate of Service

\*255358

CERTIFICATE OF SERVICE

Re: Pennsylvania-American Water Company- :  
Wastewater Division Supplement No. 6 to : Docket No. R-2018-3002504  
Tariff Wastewater-Pa. P.U.C. No. 16 :

I hereby certify that I have this day served a true copy of the following document, the Office of Consumer Advocate's Notice of Intervention and Public Statement, upon parties of record in this proceeding in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant), in the manner and upon the persons listed below:

Dated this 25<sup>th</sup> day of July 2018.

SERVICE BY E-MAIL & INTER-OFFICE MAIL

Allison C. Kaster, Esquire  
Bureau of Investigation & Enforcement  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street, 2<sup>nd</sup> Floor  
Harrisburg, PA 17120

SERVICE BY E-MAIL & FIRST CLASS MAIL, POSTAGE PREPAID

Susan Simms Marsh, Esquire  
John Cox  
Pennsylvania-American Water Company  
800 Hershey Park Drive  
Hershey, PA 17033

Anthony C. DeCusatis, Esquire  
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1701 Market Street  
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John Evans, Esquire  
Office of Small Business Advocate  
300 North Second Street, Suite 202  
Harrisburg, PA 17101

/s/ Christine Maloni Hoover  
Christine Maloni Hoover  
Senior Assistant Consumer Advocate  
PA Attorney I.D. # 50026  
E-Mail: [CHoover@paoca.org](mailto:CHoover@paoca.org)

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Phone: (717) 783-5048  
Fax: (717) 783-7152  
Dated: July 25, 2018  
\*255366

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Pennsylvania-American Water Company- :  
Wastewater Division Supplement No. 6 to : Docket No. R-2018-3002504  
Tariff Wastewater-Pa. P.U.C. No. 16 :

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NOTICE OF INTERVENTION  
OF THE  
OFFICE OF CONSUMER ADVOCATE

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Pursuant to 52 Pa. Code §§ 5.71-74, the Office of Consumer Advocate hereby gives Notice of Intervention in the above-captioned proceeding. A copy of all correspondence and notices, documents, orders or other communications with respect to the above-captioned proceeding should be addressed to the following:

Christine Maloni Hoover  
Senior Assistant Consumer Advocate  
Office of Consumer Advocate  
555 Walnut Street  
5<sup>th</sup> Floor, Forum Place  
Harrisburg, PA 17101-1923  
Telephone: (717) 783-5048  
Fax: (717) 783-7152

Respectfully Submitted,

/s/ Christine Maloni Hoover  
Christine Maloni Hoover  
Senior Assistant Consumer Advocate  
PA Attorney I.D. # 50026  
E-Mail: [CHoover@paoca.org](mailto:CHoover@paoca.org)

DATED: July 25, 2018  
255375.docx

PUBLIC STATEMENT OF THE OFFICE OF CONSUMER ADVOCATE  
PURSUANT TO 71 P.S. SECTION 309-4(e)

Act 161 of the Pennsylvania General Assembly, 71 P.S. § 309-2, as enacted July 9, 1976, authorizes the Consumer Advocate to represent the interests of consumers before the Pennsylvania Public Utility Commission (PUC or Commission). In accordance with Act 161, and for the following reasons, the Acting Consumer Advocate determined to file a Notice of Intervention and participate in proceedings before the Commission involving Pennsylvania-American Water Company – Wastewater Division (PAWC or Company) tariff filing at Docket No. R-2018-3002504.

On June 5, 2018, PAWC filed Supplement No. 6 to Tariff Wastewater– Pa. P.U.C. No. 16 (Wastewater Supplement No. 16) with an effective date of August 4, 2018. Proposed Wastewater Supplement No. 16 addresses the treatment and calculation of customer contributions, customer advances and certain customer deposits after the Tax Cuts and Jobs Act (TCJA). The Company proposes the “no gross up” method which will require its customers, rather than the entities contributing the capital, to pay the income taxes associated with the deposit, advance or contribution.

The objective of the Acting Consumer Advocate in intervening in this case is to protect the interests of consumers in PAWC’s service territory and to ensure that the resolution of the proposed tariff is just and reasonable. The OCA will seek to ensure that the treatment of the costs is consistent with Commission regulations, and applicable case law, and that the resultant rates are just and reasonable.

PAWC serves approximately 65,000 customers in portions of twelve counties in Pennsylvania.