

COMMONWEALTH OF PENNSYLVANIA



OFFICE OF CONSUMER ADVOCATE

555 Walnut Street, 5th Floor, Forum Place
Harrisburg, Pennsylvania 17101-1923
(717) 783-5048
800-684-6560

 @pa_oca

 /pennoca

FAX (717) 783-7152
consumer@paoca.org

September 10, 2020

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

Re: Tim McKercher
v.
Hanover Municipal Waterworks
Docket No. C-2020-3021080

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.

Respectfully submitted,

/s/ Erin L. Gannon
Erin L. Gannon
Senior Assistant Consumer Advocate
PA Attorney I.D. # 83487
E-Mail: EGannon@paoca.org

Enclosures:

cc: Office of Administrative Law Judge (**email only**)
Office of Special Assistants (**email only**: ra-OSA@pa.gov)
Bureau of Technical Utility Services (**email only**)
Certificate of Service

*295872

CERTIFICATE OF SERVICE

Re: Tim McKercher :
v. : Docket No. C-2020-3021080
Hanover Municipal Waterworks :

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 10th day of September 2020.

SERVICE BY E-MAIL ONLY

Richard A. Kanaskie, Esquire
Bureau of Investigation & Enforcement
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor
Harrisburg, PA 17120

John R. Evans, Esquire
Office of Small Business Advocate
555 Walnut Street
1st Floor, Forum Place
Harrisburg, PA 17101-1923

Scott T. Wyland, Esquire
Isaac P. Wakefield, Esquire
Salzmann Hughes, PC
112 Market Street, 8th Floor
Harrisburg, PA 17101

Tim McKercher
375 Park Heights Blvd
Hanover, PA 17331

Tracey Albrecht
390 Park Heights Blvd
Hanover, PA 17331

/s/ Erin L. Gannon
Erin L. Gannon
Senior Assistant Consumer Advocate
PA Attorney I.D. # 83487
E-Mail: EGannon@paoca.org

Christy M. Appleby
Assistant Consumer Advocate
PA Attorney I.D. # 85824
E-Mail: CAAppleby@paoca.org

Christine Maloni Hoover
Senior Assistant Consumer Advocate
PA Attorney I.D. # 50026
E-Mail: CHoover@paoca.org

Counsel for:
Office of Consumer Advocate
555 Walnut Street
5th Floor, Forum Place
Harrisburg, PA 17101-1923
Phone: (717) 783-5048
Fax: (717) 783-7152
Dated: September 10, 2020
*295876

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Tim McKercher :
 :
 v. : Docket No. C-2020-3021080
 :
 Hanover Municipal Waterworks :

NOTICE OF INTERVENTION

Pursuant to 52 Pa. Code Section 5.71(a) and 71 P.S. § 309-4, 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
Erin L. Gannon
Senior Assistant Consumer Advocates
Christy M. Appleby
Assistant Consumer Advocate
Office of Consumer Advocate
555 Walnut Street 5th Floor, Forum Place
Harrisburg, PA 17101-1923

Respectfully submitted,

/s/ Erin L. Gannon
Erin L. Gannon
Senior Assistant Consumer Advocate

DATED: September 10, 2020
295802

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 an Intervention and participate in proceedings before the Commission involving the July 30, 2020 Formal Complaint filed by Tim McKercher against Hanover Municipal Water Works (Hanover) at Docket No. C-2020-3021080.

In his Formal Complaint, Mr. McKercher alleges that Hanover plans to abandon an existing water main and construct a new main in a different location. In order to maintain service, Hanover directed Mr. McKercher and other customers connected to the existing main to install and bear the estimated \$5,100 per customer cost of a new service line. In his Formal Complaint, Mr. McKercher states his opposition to paying for the installation of a new service line and appurtenances.

On August 19, 2020, Hanover filed a Petition for a Declaratory Order at Docket No. P-2020-3021398 requesting that the Commission declare that the customers are required to and solely responsible for the cost of constructing and connecting new service lines. On September 8, 2020, the Office of Consumer Advocate (OCA) filed an Answer and a Notice of Intervention.

The OCA has determined to participate in both proceedings to protect the interests of Hanover's customers. The OCA seeks to ensure that adequate and continuous service is provided to all consumers in a just and reasonable manner and in accordance with applicable statutes and regulations.