



COMMONWEALTH OF PENNSYLVANIA

January 13, 2021

**E-FILED**

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

**Re: Pennsylvania-American Water Company-Wastewater Division Upper Pottsgrove Township Wastewater System Section 1329 Application / Docket No. A-2020-3021460**

Dear Secretary Chiavetta:

Enclosed please find the Notice of Intervention, Public Statement, and Verification, on behalf of the Office of Small Business Advocate (“OSBA”), in the above-captioned proceeding.

Copies will be served on all known parties in this proceeding, as indicated on the attached Certificate of Service.

If you have any questions, please do not hesitate to contact me.

Sincerely,

/s/ Erin K. Fure

Erin K. Fure  
Assistant Small Business Advocate  
Attorney ID No. 312245

*Enclosures*

cc: Brian Kalcic  
Parties of Record

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

<b>Pennsylvania-American Water Company-</b>	:	
<b>Wastewater Division</b>	:	<b>Docket No. A-2020-3021460</b>
<b>Upper Pottsgrove Township Wastewater</b>	:	
<b>System Section 1329</b>	:	
<b>Application</b>		

**NOTICE OF INTERVENTION  
OF THE OFFICE OF SMALL BUSINESS ADVOCATE**

The Office of Small Business Advocate (“OSBA”) files this Notice of Intervention with respect to the Application that was filed with the Pennsylvania Public Utility Commission (“PUC” or “Commission”) on November 24, 2020 by Pennsylvania-American Water Company. (“PAWC” or “Company”), with respect to its request for approval to acquire the wastewater assets of Upper Pottsgrove Township. In support of this Intervention, the OSBA avers as follows:

1. The OSBA is an agency of the Commonwealth of Pennsylvania authorized by the Small Business Advocate Act (Act 181 of 1988, 73 P.S. §§ 399.41 – 399.50) to represent the interest of small business customers as a party in proceedings before the Commission.
2. Intervention in this case is necessary to ensure that the interests of small business customers served by PAWC are adequately represented.

3. Representing the OSBA in this proceeding is:

Erin K. Fure  
Office of Small Business Advocate  
555 Walnut Street, 1<sup>st</sup> Floor  
Harrisburg, PA 17101  
(717) 783-2525  
(717) 783-2831 (fax)  
[efure@pa.gov](mailto:efure@pa.gov)

Respectfully Submitted,

/s/ Erin K. Fure

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Erin K. Fure  
Assistant Small Business Advocate  
Attorney ID No. 312245

For:  
John R. Evans  
Small Business Advocate

Dated: January 13, 2021

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

<b>Pennsylvania-American Water Company-</b>	:	
<b>Wastewater Division</b>	:	<b>Docket No. A-2020-3021460</b>
<b>Upper Pottsgrove Township Wastewater</b>	:	
<b>System Section 1329</b>	:	
<b>Application</b>	:	

**PUBLIC STATEMENT OF THE  
OFFICE OF SMALL BUSINESS ADVOCATE**

The Small Business Advocate is authorized and directed to represent the interest of small business consumers of utility services in Pennsylvania under the provisions of the Small Business Advocate Act, Act 181 of 1988, 73 P.S. §§ 399.41 - 399.50 (“Act”). The Act further provides that the Small Business Advocate is to issue publicly a written statement stating concisely the specific interest of small business consumers to be protected by his initiation of or intervention in any proceeding involving those interests before the Public Utility Commission or any other agency or court. This public statement relates to the filing today by the Small Business Advocate of an intervention regarding the Application filed by Pennsylvania-American Water Company. (“PAWC” or “Company”), with respect to its request for approval to acquire the wastewater assets of Upper Pottsgrove Township. The Small Business Advocate has intervened in this case to ensure that the interests of small business customers served by the Company are adequately represented.

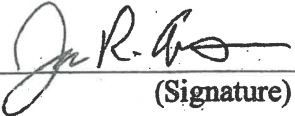
In view of the foregoing, the Small Business Advocate will participate in proceedings before the Public Utility Commission to investigate the reasonableness of the Company’s requested relief. The Small Business Advocate will ask the Commission to deny any proposed changes in the Company’s present tariffs that apply to small business customers that are not proven by the Company to be lawful, just, reasonable and non-discriminatory to all its customer classes.

Dated: January 13, 2021

**VERIFICATION**

I, John R. Evans, hereby state that the facts set forth herein above are true and correct to the best of my knowledge, information and belief and that I expect to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa. C.S. § 4904 (relating to unsworn falsification to authorities).

Date: 01/13/2021

  
(Signature)

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**Pennsylvania-American Water Company-  
Wastewater Division  
Upper Pottsgrove Township Wastewater  
System Section 1329  
Application**

:  
: **Docket No. A-2020-3021460**  
:  
:

**CERTIFICATE OF SERVICE**

I hereby certify that true and correct copies of the foregoing have been served via email only (*unless other noted below*) upon the following persons, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

The Honorable Charles E. Rainey Jr.  
Chief Administrative Law Judge  
Pennsylvania Public Utility Commission  
400 North Street  
Commonwealth Keystone Building  
Harrisburg, PA 17120  
[crainey@pa.gov](mailto:crainey@pa.gov)

Tanya J. McCloskey, Esquire  
Acting Consumer Advocate  
Office of Consumer Advocate  
555 Walnut Street, 5th Floor  
Harrisburg, PA 17101  
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(*Counsel for OCA*)

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(*Counsel for BIE*)

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(*Counsel for PAWC*)

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(*Counsel for PAWC*)

DATE: January 13, 2021

/s/ Erin K. Fure

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Erin K. Fure  
Assistant Small Business Advocate  
Attorney ID No. 312245