



July 12, 2021

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

Re: Joint Application of Veolia Environment S.A., Veolia North America, Inc., SUEZ S.A., SUEZ Water Pennsylvania Inc. and SUEZ Water Bethel Inc. for all approvals pursuant to Sections 1102(a)(3), (4), and 1103 of the Pennsylvania Public Utility Code, and as otherwise required under the Pennsylvania Public Utility Code for the change in control of SUEZ Water Pennsylvania Inc. and SUEZ Water Bethel Inc.
Docket Nos. A-2021-3026515, A-2021-3026522, A-2021-3026523

Dear Counsel:

Please find the attached **Petition to Intervene of the Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania (CAUSE-PA)** in the above noted proceeding.

As indicated on the attached Certificate of Service, service on the parties was accomplished by email only.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read "John W. Sweet", written over a horizontal line.

John W. Sweet
Counsel for CAUSE-PA

CC: *Certificate of Service*

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

Joint Application of Veolia Environment S.A.,	:	
Veolia North America, Inc., SUEZ S.A.,	:	
SUEZ Water Pennsylvania Inc.	:	Docket No. A-2021-3026515
and SUEZ Water Bethel Inc. for all approvals	:	A-2021-3026522
pursuant to Sections 1102(a)(3), (4), and 1103	:	A-2021-3026523
of the Pennsylvania Public Utility Code, and	:	
as otherwise required under the Pennsylvania	:	
Public Utility Code for the change in control of	:	
SUEZ Water Pennsylvania Inc.	:	
and SUEZ Water Bethel Inc.	:	

Certificate of Service

I hereby certify that I have this day served copies of the **Petition to Intervene of the Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania (CAUSE-PA)** upon the parties of record in the above captioned proceeding in accordance with the requirements of 52 Pa. Code § 1.54.

VIA Email

Adeolu A. Bakare, Esq.
Teresa Harrold, Esq.
Kenneth R. Stark, Esq.
McNees Wallace & Nurick LLC
100 Pine Street Harrisburg, PA 17101
abakare@mcneeslaw.com
tharrold@mcneeslaw.com
kstark@mcneeslaw.com

Allison Kaster, Esq.
Bureau of Investigation and Enforcement
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
P.O. Box 3265
Harrisburg, PA 17105
akaster@pa.gov

David P. Zambito, Esq.
Jonathan P. Nase, Esq.
Cozen O'Connor
17 North Second Street, Suite 1410
Harrisburg, PA 17101
dzambito@cozen.com
jnase@cozen.com

Christine Hoover, Esq.
Erin Gannon, Esq.
Office of Consumer Advocate
555 Walnut Street, Forum Place, 5th Floor
Harrisburg, PA 17101
choover@paoca.org
egannon@paoca.org

Erin Fure, Esq.
Office of Small Business Advocate
Forum Place
555 Walnut St., 1st Floor
Harrisburg, PA 17101
efure@pa.gov

Respectfully Submitted,
PENNSYLVANIA UTILITY LAW PROJECT
Counsel for CAUSE-PA



John W. Sweet, Esq.
PA ID: 320182
118 Locust Street
Harrisburg, PA 17101
717-710-3839
PULP@putilitylawproject.org

July 12, 2021

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Joint Application of Veolia Environment S.A.,	:	
Veolia North America, Inc., SUEZ S.A.,	:	
SUEZ Water Pennsylvania Inc.	:	Docket No. A-2021-3026515
and SUEZ Water Bethel Inc. for all approvals	:	A-2021-3026522
pursuant to Sections 1102(a)(3), (4), and 1103	:	A-2021-3026523
of the Pennsylvania Public Utility Code, and	:	
as otherwise required under the Pennsylvania	:	
Public Utility Code for the change in control of	:	
SUEZ Water Pennsylvania Inc.	:	
and SUEZ Water Bethel Inc.	:	

PETITION TO INTERVENE OF
THE COALITION FOR AFFORDABLE UTILITY SERVICE AND ENERGY EFFICIENCY
IN PENNSYLVANIA (*CAUSE-PA*)

Pursuant to the provisions of the Rules of Practice and Procedure of the Pennsylvania Public Utility Commission (Commission), 52 Pa. Code §§ 5.71-5.74, the Coalition for Affordable Utility Service and Energy Efficiency in Pennsylvania (*CAUSE-PA*), through its legal counsel at the Pennsylvania Utility Law Project (*PULP*), hereby petitions the Commission to intervene in the above-captioned proceeding. In support thereof, *CAUSE-PA* states as follows:

1. On June 15, 2021, Veolia Environment S.A., Veolia North America, Inc., (Collectively *Veolia*) SUEZ S.A., SUEZ Water Pennsylvania Inc. and SUEZ Water Bethel Inc. (Collectively *SUEZ*)¹ filed an Application seeking Commission approval of Veolia’s

¹ Together Veolia and SUEZ will be referred to as “Applicants” throughout this Petition.

acquisition of a majority or all of the outstanding shares of SUEZ in accordance with a Combination Agreement entered into between those entities on May 14, 2021.

2. CAUSE-PA is an unincorporated association of low-income individuals that advocates on behalf of its members to enable consumers of limited economic means to connect to and maintain affordable water, electric, heating and telecommunication services.

3. CAUSE-PA membership is open to moderate and low income individuals residing in the Commonwealth of Pennsylvania, including customers of SUEZ, who are committed to the goal of helping low income families maintain affordable access to utility services and achieve economic independence.

4. CAUSE-PA is located, c/o the Pennsylvania Legal Aid Network, at 118 Locust Street, Harrisburg, PA 17101.

5. CAUSE-PA has a significant interest in the impact that the proposed transaction will have on moderate and low income residential customers. Specifically, CAUSE-PA is interested in (a) whether there are actual and meaningful affirmative benefits to low income ratepayers that will result from the acquisition, (b) whether the quality of service for SUEZ customers will improve as a result of this acquisition, (c) the impact the acquisition will have on SUEZ's rates and terms/conditions of service, and (d) the impact the acquisition will have on the SUEZ's existing low income programs.

6. CAUSE-PA asserts that prior to approval of the Application, the Commission must examine the SUEZ's low income programs to ensure that these programs are adequately funded, locally managed, and improved to meet the needs of low income, payment troubled SUEZ customers.

7. Eligibility to intervene in Commission proceedings is governed by 52 Pa. Code § 5.72, which provides in relevant part that “[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.” 52 Pa. Code § 5.72(a).

8. Section 5.72 further provides that the right or interest may be one “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.” 52 Pa. Code. § 5.72(a)(2).

9. Even though Section 5.72 speaks of the rights of a “person” to intervene, the Commonwealth Court has consistently stated that “an association may have standing as a representative of its members . . . as long as an organization has at least one member who has or will suffer a direct, immediate, and substantial injury to an interest as a result of the challenged action, [i.e., is aggrieved, the organization] has standing.” Energy Cons. Council of Pa. v. Pa. PUC, 995 A.2d 465, 476 (Pa. Commw. Ct. 2010) (alteration in original) (citing Trippls Park v. Pa. PUC, 415 A.2d 967 (Pa. Commw. Ct. 1980); Parents United for Better Schools v. School Dist. of Phila., 646 A.2d 689 (Pa. Commw. Ct. 1994)).

10. CAUSE-PA has standing to intervene because its members have or will suffer a direct, immediate, and substantial injury to an interest as a result of this proceeding.

11. CAUSE-PA is represented in this proceeding by:

John Sweet, Esq., PA ID: 320182
Elizabeth R. Marx, Esq., PA ID: 309014
Ria M. Pereira, Esq., PA ID: 316771
Lauren Berman, Esq., PA ID: 310116
PENNSYLVANIA UTILITY LAW PROJECT
118 Locust Street
Harrisburg, PA 17101
Tel.: 717-236-9486
Fax: 717-233-4088

Email: PULP@putilitylawproject.org (all counsel)
jsweet@putilitylawproject.org
emarx@putilitylawproject.org
rpereira@putilitylawproject.org
lberman@putilitylawproject.org

12. Counsel for CAUSE-PA consents to the service of documents by electronic mail to PULP@putilitylawproject.org, as provided in 52 Pa. Code § 1.54(b)(3).

13. CAUSE-PA asserts that the issues identified herein, along with any future issues presented by intervening parties, must be thoroughly reviewed prior to approval of the Application.

14. CAUSE-PA requests that it be permitted to intervene as a full party in order to adequately represent its interests in this proceeding.

WHEREFORE, CAUSE-PA respectfully requests that its Petition to Intervene be granted and that it be accorded full party status in the captioned proceeding.

Respectfully submitted,

PENNSYLVANIA UTILITY LAW PROJECT
Counsel for CAUSE-PA



John Sweet, Esq., PA ID: 320182

Elizabeth R. Marx, Esq., PA ID: 309014

Ria M. Pereira, Esq., PA ID: 316771

Lauren Berman, Esq., PA ID: 310116

PENNSYLVANIA UTILITY LAW PROJECT

118 Locust Street

Harrisburg, PA 17101

Tel.: 717-236-9486

Fax: 717-233-4088

Email: PULP@pautilitylawproject.org (all counsel)

jsweet@pautilitylawproject.org

rpereira@pautilitylawproject.org

emarx@pautilitylawproject.org

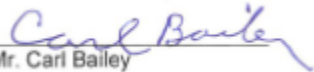
lberman@pautilitylawproject.org

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Joint Application of Veolia Environment S.A.,	:	
Veolia North America, Inc., SUEZ S.A.,	:	
SUEZ Water Pennsylvania Inc.	:	Docket No. A-2021-3026515
and SUEZ Water Bethel Inc. for all approvals	:	A-2021-3026522
pursuant to Sections 1102(a)(3), (4), and 1103	:	A-2021-3026523
of the Pennsylvania Public Utility Code, and	:	
as otherwise required under the Pennsylvania	:	
Public Utility Code for the change in control of	:	
SUEZ Water Pennsylvania Inc.	:	
and SUEZ Water Bethel Inc.	:	

Verification

I, Carl Bailey, a member of the Executive Committee of the Coalition for Affordable Utility Services and Energy Efficiency (“CAUSE-PA”), on behalf of CAUSE-PA, hereby state that the facts contained in the foregoing pleading are true and correct to the best of my knowledge, information and belief, that I am duly authorized to make this Verification, 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 10 Pa. C.S. § 4904 (relating to unsworn falsification to authorities).


Mr. Carl Bailey

On behalf of the Executive Committee of
the Coalition for Affordable Utility Services
and Energy Efficiency in Pennsylvania
(CAUSE-PA)

Date: July 12, 2021