



COMMONWEALTH OF PENNSYLVANIA

June 12, 2021

**E-FILED**

Rosemary Chiavetta, Secretary  
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 No. A-2021-3026515**

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.

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**

**Joint Application of Veolia Environment :  
S.A., Veolia North America, Inc., SUEZ :  
S.A., SUEZ Water Pennsylvania Inc. and : Docket No. A-2021-3026515  
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. :**

**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 Joint Application that was filed with the Pennsylvania Public Utility Commission (“PUC” or “Commission”) on June 11, 2021 by Veolia Environnement S.A., Veolia north America, Inc. (collectively “Veolia”) and SUEZ S.A., SUEZ Water Pennsylvania Inc. and SUEZ Water Bethel Inc. (collectively “SUEZ”), with respect to its request for approval for a change in control of SUEZ Water Pennsylvania Inc. and SUEZ Water Bethel Inc. 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 Veolia and SUEZ 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)

Dated: 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. and : Docket No. A-2021-3026515  
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. :**

**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 Joint Application filed by Veolia Environnement S.A., Veolia north America, Inc. and SUEZ S.A., SUEZ Water Pennsylvania Inc. and SUEZ Water Bethel Inc. (collectively “Joint Applicants”), with respect to the request for approval for a change in control of SUEZ Water Pennsylvania Inc. and SUEZ Water Bethel Inc. The Small Business Advocate has intervened in this case to ensure that the interests of small business customers served by the Joint Applicants 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 Joint Applicants' requested relief. The Small Business Advocate will ask the Commission to deny any proposed changes in the Joint Applicants' present tariffs that apply to small business customers that are not proven by the Joint Applicants to be lawful, just, reasonable and non-discriminatory to all its customer classes.

Dated: 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. and : Docket No. A-2021-3026515  
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. :**

**VERIFICATION**

I, Erin K. Fure, 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: July 12, 2021

/s/ Erin K. Fure

(Signature)

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**Joint Application of Veolia Environment :  
S.A., Veolia North America, Inc., SUEZ :  
S.A., SUEZ Water Pennsylvania Inc. and : Docket No. A-2021-3026515  
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. :**

**CERTIFICATE OF SERVICE**

I hereby certify that true and correct copies of the foregoing have been served via email and/or First-Class mail (*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)

Christine Hoover, Esq.  
Erin Gannon, Esq.  
Office of Consumer Advocate  
555 Walnut Street, Forum Place,  
5th Floor  
Harrisburg, PA 17101  
[choover@paoca.org](mailto:choover@paoca.org)  
[egannon@paoca.org](mailto:egannon@paoca.org)  
(*Counsel for OCA*)

Allison Kaster, Esquire  
Bureau of Investigation & Enforcement  
400 North Street  
Commonwealth Keystone Building  
Harrisburg, PA 17120  
[akaster@pa.gov](mailto:akaster@pa.gov)  
(*Counsel for BIE*)

Adeolu A. Bakare, Esquire  
Teresa Harrold, Esquire  
Kenneth R. Stark, Esquire  
McNees Wallace & Nurick LLC  
100 Pine Street  
Harrisburg, PA 17101  
[abakare@mcneeslaw.com](mailto:abakare@mcneeslaw.com)  
[tharrold@mcneeslaw.com](mailto:tharrold@mcneeslaw.com)  
[kstark@mcneeslaw.com](mailto:kstark@mcneeslaw.com)

David P. Zambito, Esquire  
Jonathan P. Nase, Esquire  
Cozen O'Connor  
17 North Second Street,  
Suite 1410  
Harrisburg, PA 17101  
[dzambito@cozen.com](mailto:dzambito@cozen.com)  
[jnase@cozen.com](mailto:jnase@cozen.com)

/s/ Erin K. Fure

---

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

DATE: July 12, 2021