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July 30, 2021

Via Electronic Filing

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

In re: Docket No. A-2021-3024681
Application of Pennsylvania-American Water Company

Dear Secretary Chiavetta:

We are counsel to the York City Sewer Authority and are submitting, with this letter via electronic filing, the Authority's Petition to Intervene in the above matter. Please enter my appearance and contact me if anything further is needed in regard to this submission.

Very truly yours,

THOMAS, NIESEN & THOMAS, LLC

By

Thomas T. Niesen

cc: Certificate of Service (w/encl.)
Stacey R. MacNeal, Esquire (via email, w/encl.)

**Before the
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Application of Pennsylvania-American Water Company : Docket No. A-2021-3024681
Water Company :

**PETITION TO INTERVENE OF
YORK CITY SEWER AUTHORITY**

TO THE PENNSYLVANIA PUBLIC UTILITY COMMISSION:

AND NOW, comes the York City Sewer Authority (“YCSA”), by its attorneys, and, pursuant to 52 Pa. Code § 5.71, *et seq.*, files this petition to intervene in the above-captioned Application of Pennsylvania-America Water Company (“PAWC”) as follows:

INTRODUCTION

1. The name and address of Petitioner are:

York City Sewer Authority
c/o 100 East Market Street
York, PA 17401

2. The names, business addresses, and contact information of Petitioner’s attorneys

are:

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3. This proceeding concerns the Application of PAWC asking the Public Utility Commission (“Commission”) to approve, *inter alia*, PAWC’s acquisition of substantially all of the wastewater collection and treatment system of YSCA. YSCA is a municipal authority organized and existing under the laws of the Commonwealth of Pennsylvania.

4. As presented in the Application, YSCA owns the wastewater collection and treatment system and is the “Seller” of the system under the Asset Purchase Agreement (“APA”), dated April 6, 2021, with PAWC (the “Proposed Transaction”). YSCA leases the system to the City of York and the City operates the system and provides wastewater service.

ELIGIBILITY TO INTERVENE

5. Section 5.72 of the Commission’s Rules of Administrative Practice and Procedure for Formal Proceedings (“Rules”), 52 Pa. Code § 5.72, provides 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. The right of 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.

6. As the owner and Seller of the system, YSCA has an obvious interest in both the Proposed Transaction and this proceeding seeking Commission approval that may be directly affected and which is not adequately represented by other participants. YSCA, moreover, may be bound by the action of the Commission in reviewing, considering and, ultimately, addressing PAWC’s request that the Commission approve PAWC’s Application and the Proposed Transaction.

CRITERIA FOR INTERVENTION

7. Section 5.73 of the Public Utility Commission's Rules of Administrative Practice and Procedure for Formal Proceedings, 52 Pa. Code § 5.73, provides that a petition to intervene must set out clearly and concisely the facts from which the alleged intervention or interest of the petitioner can be determined, the grounds of the proposed intervention and the petitioner's position regarding the issues in the proceeding. YCSA presents the following in support of its intervention in accordance with the requirements of Section 5.73.

YCSA's Interest and Grounds for Its Intervention

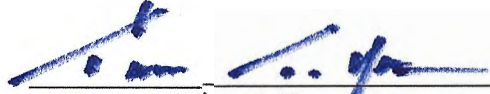
8. As the owner of the wastewater collection and treatment system that is the subject of the Application and the Seller under the APA, YCSA has a clear and obvious interest in this proceeding and clear obvious grounds for intervening.

YCSA's Position Regarding the Issues

9. YCSA supports the Application of PAWC for Commission approval to acquire the wastewater collection and treatment system and will actively participate, to the extent appropriate and necessary, in pursuit of Commission approval. It anticipates that its participation will be secondary to the participation of the City of York, which, as set forth above, is YCSA's lessee of the system and the present provider of wastewater service.

WHEREFORE the York City Sewer Authority requests that the Pennsylvania Public Utility Commission grant this Petition to Intervene as aforesaid.

Respectfully submitted,



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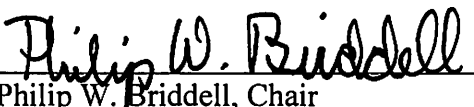
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Attorneys for York City Sewer Authority

DATED: July 30, 2021

VERIFICATION

I, Philip W. Briddell, Chair of the York City Sewer Authority, hereby state that the facts set forth in the foregoing Petition to Intervene 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).


Philip W. Briddell, Chair
York City Sewer Authority

Dated: July 30, _____, 2021

**Before the
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Application of Pennsylvania-American Water Company : Docket No. A-2021-3024681
Water Company :

CERTIFICATE OF SERVICE

I hereby certify that I have this 30th day of July, 2021, served a true and correct copy of the foregoing Petition to Intervene of the York City Sewer Authority, upon the persons listed below:

VIA ELECTRONIC MAIL

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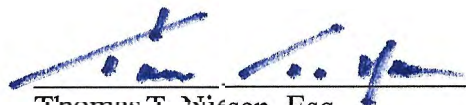
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