

COMMONWEALTH OF PENNSYLVANIA




OFFICE OF CONSUMER ADVOCATE

555 Walnut Street, 5th Floor, Forum Place  
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May 19, 2022

 @pa\_oca

 /pennoca

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

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

Re: Pennsylvania Public Utility Commission  
v.  
The Borough of Ambler  
Docket No. R-2022-3031704

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 as indicated on the enclosed Certificate of Service.

Respectfully submitted,

/s/ Christine Maloni Hoover  
Christine Maloni Hoover  
Deputy Consumer Advocate  
PA Attorney I.D. # 50026  
E-Mail: [CHoover@paoca.org](mailto:CHoover@paoca.org)

Enclosures:

cc: The Honorable Steven K. Haas (**email only**)  
The Honorable John M. Coogan (**email only**)  
Bureau of Technical Utility Services (**email only**: [dsearfoorc@pa.gov](mailto:dsearfoorc@pa.gov), [sdonnelly@pa.gov](mailto:sdonnelly@pa.gov))  
Office of Special Assistants (**email only**: [ra-OSA@pa.gov](mailto:ra-OSA@pa.gov))  
Certificate of Service

\*328990

CERTIFICATE OF SERVICE

Re: Pennsylvania Public Utility Commission :  
v. : Docket No. R-2022-3031704  
The Borough of Ambler :

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 19<sup>th</sup> day of May 2022.

**SERVICE BY E-MAIL ONLY**

Allison C. Kaster, Esquire  
Bureau of Investigation & Enforcement  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street, 2<sup>nd</sup> Floor  
Harrisburg, PA 17120  
[akaster@pa.gov](mailto:akaster@pa.gov)

Sharon E. Webb, Esquire  
Office of Small Business Advocate  
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Adeolu A. Bakare, Esquire  
McNees Wallace & Nurick LLC  
100 Pine Street  
P.O. Box 1166  
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*Counsel for the Borough of Ambler*

/s/ Christine Maloni Hoover  
Christine Maloni Hoover  
Deputy Consumer Advocate  
PA Attorney I.D. # 50026  
E-Mail: [CHoover@paoca.org](mailto:CHoover@paoca.org)

Counsel for:  
Office of Consumer Advocate  
555 Walnut Street  
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Harrisburg, PA 17101-1923  
Phone: (717) 783-5048  
Fax: (717) 783-7152  
Dated: May 19, 2022  
\*328992

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Re: Pennsylvania Public Utility Commission :  
v. : Docket No. R-2022-3031704  
The Borough of Ambler :

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NOTICE OF INTERVENTION  
OF THE  
OFFICE OF CONSUMER ADVOCATE

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Pursuant to 52 Pa. Code § 5.71-74, 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  
Deputy Consumer Advocate  
Office of Consumer Advocate  
555 Walnut Street  
5<sup>th</sup> Floor, Forum Place  
Harrisburg, PA 17101-1923  
Phone: (717) 783-5048  
Fax: (717) 783-7152

Respectfully submitted,

/s/ Christine Maloni Hoover  
Christine Maloni Hoover  
Deputy Consumer Advocate  
PA Attorney I.D. # 50026  
E-Mail: [CHoover@paoca.org](mailto:CHoover@paoca.org)

DATED: May 19, 2022  
\*328991

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 a Notice of Intervention, and to participate in proceedings before the Commission involving the rate increase request filed by the Borough of Ambler

The objective of the Acting Consumer Advocate in filing an Intervention in this matter is to protect the interests of PAWC's customers. The Acting Consumer Advocate will seek to ensure that the Borough of Ambler is permitted to implement only a level of rates that is fully justified and in accordance with sound ratemaking principles. The Acting Consumer Advocate will strive to prevent the Borough of Ambler from collecting from ratepayers all alleged costs that cannot be justified, or are unreasonable or unduly discriminatory, or otherwise in violation of the Public Utility Code and will review the current rates charged by the Borough of Ambler.

The Acting Consumer Advocate has filed this Intervention and will, in the course of the proceeding, investigate the Borough of Ambler's proposed annual water revenue increase of approximately \$637,691 for its outside Borough customers and request that the PUC deny all proposed increases or changes that are not proven to be justified, reasonable, and in accordance with sound ratemaking principles. Under the Borough of Ambler's request, a typical residential water customer using 14,600 gallons per quarter would see their quarterly bill increase from \$80.03 to \$116.19 per quarter, or by 45.2%.

The Borough of Ambler serves approximately 3,747 water customers in the Townships of Upper Dublin, Lower Gwynedd, Whitpain, and Whitemarsh, Montgomery County, in addition to providing public water service within the Borough of Ambler.