



COMMONWEALTH OF PENNSYLVANIA

April 7, 2023

**E-FILED**

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

**Re: Application of Pennsylvania-American Water Company for Acquisition of the  
Wastewater Assets of the Borough of Brentwood / Docket No. A-2021-3024058**

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/ Sharon E. Webb*

Sharon E. Webb  
Assistant Small Business Advocate  
Attorney ID No. 73995

*Enclosures*

cc: Brian Kalcic  
Parties of Record

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

In re: Application of Pennsylvania-American :  
Water Company under Sections 1102(a) and :  
1329 of the Pennsylvania Public Utility Code, :  
66 Pa C.S. §§ 1102(a) and 1329, for approval :  
of (1) the transfer, by sale, to Pennsylvania- : Docket No. A-2021-3024058  
American Water Company, of substantially :  
all of the assets, properties and rights related :  
to the wastewater collection and conveyance :  
system owned by the Borough of Brentwood; :  
(2) the rights of Pennsylvania-American :  
Water Company to begin to offer or furnish :  
wastewater service to the public in the :  
Borough of Brentwood in Allegheny County, :  
Pennsylvania :

**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 April 3, 2023 by Pennsylvania-American Water Company. (“PAWC” or “Company”), with respect to its request for approval to acquire the wastewater assets of the Borough of Brentwood in Allegheny County, Pennsylvania. 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:

Sharon E. Webb  
Assistant Small Business Advocate  
Pennsylvania Office of Small Business Advocate  
Forum Place  
555 Walnut Street, 1<sup>st</sup> Floor  
Harrisburg, Pennsylvania 17101  
(717) 783-2525  
(717) 783-2831 (fax)  
[swebb@pa.gov](mailto:swebb@pa.gov)

Respectfully Submitted,

*/s/ Sharon E. Webb*

---

Sharon E. Webb  
Assistant Small Business Advocate  
Attorney ID No. 73995

For:  
NazAarah Sabree  
Small Business Advocate

Dated: April 7, 2023



The Small Business Advocate has intervened in this case to ensure that the interests of small business customers served by PAWC, as well as the Borough of Brentwood 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 proposed transaction. The Small Business Advocate will ask the Commission to deny any proposed rate increase or other 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: April 7, 2023

**VERIFICATION**

I, NazAarah Sabree, 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: April 7, 2023



(Signature)

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

In re: Application of Pennsylvania-American :  
Water Company under Sections 1102(a) and :  
1329 of the Pennsylvania Public Utility Code, :  
66 Pa C.S. §§ 1102(a) and 1329, for approval :  
of (1) the transfer, by sale, to Pennsylvania- :     Docket No. A-2021-3024058  
American Water Company, of substantially :  
all of the assets, properties and rights related :  
to the wastewater collection and conveyance :  
system owned by the Borough of Brentwood; :  
(2) the rights of Pennsylvania-American :  
Water Company to begin to offer or furnish :  
wastewater service to the public in the :  
Borough of Brentwood in Allegheny County, :  
Pennsylvania

**CERTIFICATE OF SERVICE**

I hereby certify that true and correct copies of the foregoing have been served via email (*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)

Patrick Cicero, Esquire  
Consumer Advocate  
Office of Consumer Advocate  
555 Walnut Street, 5th Floor  
Harrisburg, PA 17101  
[pcicero@paoca.org](mailto:pcicero@paoca.org)

Richard Kanaskie, Esquire  
Director  
Bureau of Investigation & Enforcement  
400 North Street  
Commonwealth Keystone Building  
Harrisburg, PA 17120  
[rkanaskie@pa.gov](mailto:rkanaskie@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](mailto:dzambito@cozen.com)  
[jnase@cozen.com](mailto:jnase@cozen.com)

Elizabeth Rose Triscari, Esq.  
Erin K. Fure, Esq.  
Pennsylvania-American Water Company  
852 Wesley Drive  
Mechanicsburg, PA 17055  
[elizabeth.triscari@amwater.com](mailto:elizabeth.triscari@amwater.com)  
[erin.fure@amwater.com](mailto:erin.fure@amwater.com)

DATE: April 7, 2023

*/s/ Sharon E. Webb*

---

Sharon E. Webb  
Assistant Small Business Advocate  
Attorney ID No. 73995