

COMMONWEALTH OF PENNSYLVANIA



PATRICK M. CICERO
Consumer Advocate

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June 15, 2023

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

Re: Application of Towamencin Township, Pursuant To
66 Pa. C.S. § 1102(A), for A Certificate of Public
Convenience to Offer, Furnish, Render, And Supply
Wastewater Service to the Public in Certain Portions
of Worcester Township, Lower Salford Township,
Franconia Township and Lansdale Borough, All in
Montgomery County, Pennsylvania
Docket No. A-2023-3040661

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 on the parties as indicated on the enclosed Certificate of Service.

Respectfully submitted,

/s/ Harrison W. Breitman
Harrison W. Breitman
Assistant Consumer Advocate
PA Attorney I.D. #320580
HBreitman@paoca.org

Enclosures:

cc: The Honorable Darlene D. Heep (**email only**)
Shalea Delvillar, ALJ's Legal Assistant (**email only**: sdelvillar@pa.gov)
Certificate of Service

*347752

CERTIFICATE OF SERVICE

Application of Towamencin Township, Pursuant :
To 66 Pa. C.S. § 1102(A), for A Certificate of :
Public Convenience to Offer, Furnish, Render, :
And Supply Wastewater Service to the Public in : Docket No. A-2023-3040661
Certain Portions of Worcester Township, :
Lower Salford Township, Franconia Township :
And Lansdale Borough, All in Montgomery :
County, Pennsylvania :

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 15th day of June 2023.

SERVICE BY E-MAIL ONLY

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/s/ Harrison W. Breitman
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Counsel for:
Office of Consumer Advocate
555 Walnut Street
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Harrisburg, PA 17101-1923
Phone: (717) 783-5048
Dated: June 15, 2023
*347753

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Application of Towamencin Township	:	
Pursuant to 66 Pa. C.S., § 1102(a), For A	:	
Certificate of Public Convenience	:	
To Offer, Furnish, Render, and Supply	:	
Wastewater Service to the Public in	:	A-2023-3040661
Certain Portions of Worcester Township,	:	
Lower Salford Township, Franconia Township	:	
And Landsale Borough, All in Montgomery	:	
County, Pennsylvania	:	

NOTICE OF INTERVENTION OF THE
OFFICE OF CONSUMER ADVOCATE

Pursuant to 52 Pa. Code Sections 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:

Darryl Lawrence
Senior Assistant Consumer Advocate
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Harrison W. Breitman
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Respectfully submitted,

/s/Harrison W. Breitman
Harrison W. Breitman
Assistant Consumer Advocate

DATED: June 15, 2023
347115

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. Section 309-2, as enacted July 9, 1976, authorizes the Consumer Advocate to represent the interests of consumers before the Pennsylvania Public Utility Commission (Commission). In accordance with Act 161, and for the following reasons, the Consumer Advocate determined to file a Notice of Intervention in the proceeding before the Commission involving the proposed Application of Towamencin Township for a Certificate of Public Convenience.

On May 12, 2023, Towmaencin Township (Township or Applicant) filed an Application with respect to its request for a Certificate of Public Convenience to offer, furnish, render, and supply wastewater service to the public in certain portions of Worcester Township, Lower Salford Township, Franconia Township and Lansdale Borough, all in Montgomery County, Pennsylvania pursuant to the Pennsylvania Public Utility Code, 66 Pa. C.S. § 1102(a). The Applicant also requests a Certificate to Abandon Service upon the closing of a proposed sale of substantially all of the Applicant's assets comprising of the Applicant's wastewater system to the Pennsylvania-American Water Company (PAWC) pursuant to 66 Pa. C.S. § 1102(a). The OCA has determined to intervene and participate in these proceedings in order to protect the interests of residential customers served by the Applicant.