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VIA eFILING

July 3, 2023

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

Re: 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, approval of (1) the transfer, by sale, to Pennsylvania-American Water Company, of substantially all of the assets, properties and rights related to the wastewater collection and treatment system owned by the Butler Area Sewer Authority, (2) the rights of Pennsylvania-American Water Company to begin to offer or furnish wastewater service to the public in the City of Butler, and portions of the Borough of East Butler, and portions of the Townships of Butler, Center, Connoquenessing, Oakland, and Summit, in Butler County, Pennsylvania Docket # A-2022-3037047

Dear Secretary Chiavetta:

Attached please find the Petition to Intervene of Cleveland-Cliffs Steel for filing in the above-captioned proceedings.

Copies will be served on all known parties in these proceedings, as indicated on the attached Certificate of Service.

Respectfully submitted,

/s/ Kurt J. Boehm

Kurt J. Boehm, Esq.

Jody Kyler Cohn, Esq.

BOEHM, KURTZ & LOWRY

**COUNSEL FOR CLEVELAND-CLIFFS
STEEL**

KJBkew

**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, approval of (1) the transfer, by sale, to Pennsylvania-American Water Company, of substantially all of the assets, properties and rights related to the wastewater collection and treatment system owned by the Butler Area Sewer Authority, (2) the rights of Pennsylvania-American Water Company to begin to offer or furnish wastewater service to the public in the City of Butler, and portions of the Borough of East Butler, and portions of the Townships of Butler, Center, Connoquenessing, Oakland, and Summit, in Butler County, Pennsylvania	:	Docket No. A-2022-3037047
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**PETITION TO INTERVENE OF
CLEVELAND-CLIFFS STEEL**

AND NOW, comes Cleveland-Cliffs Steel (“Cleveland-Cliffs”), by its counsel and files the instant Petition to Intervene in response to the Petition of Pennsylvania American Water Company (“PAWC” or “Company”) pursuant to 52 Pa. Code §§ 5.71 – 5.74. In support of its Petition, Cleveland-Cliffs represents the following:

1. The Petitioner is:
Cleveland-Cliffs Steel

2. The name and address of Petitioner’s attorneys are:
Kurt J. Boehm, Esq.
Jody Kyler Cohn, Eq.
BOEHM, KURTZ & LOWRY
36 East Seventh Street, Suite 1510
Cincinnati, Ohio 45202
Ph: (513) 421-2255 Fax: (513)421-2764
Email: kboehm@bkllawfirm.com
jkylercohn@bkllawfirm.com

3. Respondent utility is:
Pennsylvania American Water Company
800 West Hershey Park Drive, P.O. Box 888
Hershey, PA 17033-0888

4. Cleveland-Cliffs consents to the service of documents by electronic mail to kboehm@bkllawfirm.com and jkylercohn@bkllawfirm.com, as provided in 52 Pa. Code § 1.54(b)(3).
5. Cleveland-Cliffs is one of the largest industrial customers on the Company's system. The rates paid by Cleveland-Cliffs for wastewater and water service could be significantly affected if the Commission approves the rate increase requested herein. Therefore, Cleveland-Cliffs has a direct and substantial interest in the Commission's determination in this matter. Cleveland-Cliffs' interest cannot adequately be represented by any other party to this proceeding.
6. Cleveland-Cliffs alleges that the information filed in support of the Company's proposed transaction is insufficient to establish that it is in the public interest.
7. Cleveland-Cliffs is currently in the process of engaging local counsel and will file a motion for admission pro hac vice shortly.

WHEREFORE, for the reasons stated above, Cleveland-Cliffs respectfully requests that its Petition to Intervene be granted and that it be afforded full party status in this proceeding.

Respectfully submitted,

/s/ Kurt J. Boehm

Kurt J. Boehm, Esq.

Jody Kyler Cohn, Esq.

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**COUNSEL FOR CLEVELAND-CLIFFS
STEEL**

VERIFICATION

I, Kurt J. Boehm, attorney for Cleveland-Cliffs Steel, hereby verify that I am authorized to execute this Verification and that the facts set forth in the foregoing Petition to Intervene are true and correct to the best of my knowledge, information and belief.

/s/ Kurt J. Boehm
Kurt J. Boehm, Esq.
BOEHM, KURTZ & LOWRY

**COUNSEL FOR CLEVELAND-CLIFFS
STEEL**

Dated: July 3, 2023

CERTIFICATE OF SERVICE

I hereby certify that I have served a true copy of the foregoing Petition to Intervene of Cleveland-Cliffs Steel upon the parties listed below in accordance with the requirements of 52 Pa. Code §1.54 (relating to service by a party) via electronic mail this 3rd day of July, 2023.

/s/ Kurt J. Boehm

Kurt J. Boehm, Esq.

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The Honorable Charles E. Rainey Jr.
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