

# BURKE VULLO REILLY ROBERTS

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November 21, 2023

**via Electronic Filing**

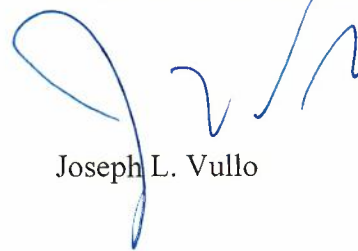
Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
400 North Street, Filing Room  
Harrisburg, PA 17120

RE: PA Public Utility Commission v. Pennsylvania-American Water Company  
Docket Nos. R-2023-3043189 (Water)  
R-2022-3043190 (Wastewater)

Dear Secretary Chiavetta:

Please accept for filing the Commission on Economic Opportunity's Petition to Intervene in the above-referenced matter. A copy of this filing was served in accordance with the attached Certificate of Service.

Respectfully submitted,



Joseph L. Vullo

JLV/jar  
encl.

cc: All Parties of Record

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

PENNSYLVANIA PUBLIC UTILITY COMMISSION,	:		
	:		
	:		
V.	:	Docket No.	R-2023-3043189 (Water)
	:		R-2023-3043190 (Wastewater)
PENNSYLVANIA-AMERICAN WATER COMPANY	:		
	:		

**PETITION TO INTERVENE**

NOW COMES, the Commission on Economic Opportunity (CEO), by and through counsel, Joseph L. Vullo, Esquire, and petitions to intervene in the above-captioned matter averring as follows:

1. The Petitioner, Commission on Economic Opportunity, is a not-for-profit corporation organized and existing under the laws of the Commonwealth of Pennsylvania with its principal office located at 165 Amber Lane, P.O. Box 1127, Wilkes-Barre, Luzerne County, Pennsylvania, 18703-1127. CEO's telephone number is (570) 826-0510.
2. CEO is an advocate for its clients - the low-income population of Luzerne County - and has been directly involved in assuring that low income persons' utility costs are contained through counseling, advice, payment assistance and energy conservation measures.
3. CEO seeks permission to intervene in Pennsylvania-American Water Company's (the Company) request for a rate increase filed with the Commission.
4. CEO is a customer of the Company and CEO serves clients who are customers of the Company.
5. CEO seeks permission to intervene in the Company's request for a rate increase not only to address the proposed increase but to ensure the adequacy of the Company's programs for its

low-income customers and the effect of any proposed rate increase or change in rate structure on those programs and customers.

6. CEO's participation as an active party in this proceeding is required to protect its substantial interests and the substantial interests of the low-income citizens it represents in ensuring that utility rates remain affordable for its clients and to ensure that its low income programs remain adequately funded and available. Accordingly, CEO's participation in this proceeding will serve the public interest.

7. Because CEO represents low-income citizens in Luzerne County, the interests of its clients are not being protected by any other party to this action.

### **POSITIONS**

8. CEO reserves the right to set forth its position on the proposed rate increases. CEO's main purpose is to address the adequacy of the Company's low-income programs and the effect of any proposed rate increases or changes in rate structure on those programs and the Company's low-income customers.

9. There is a substantial public interest in keeping utility costs affordable for all members of the community and any increase in rates should be accompanied by an increase in funding available to the Company's low-income programs so that its rates remain just and reasonable across all customer classes.

10. CEO has been an active participant in numerous prior requests for rate increases and in other PUC proceedings, including the last rate case filed by this Company.

### **REQUEST FOR RELIEF**

WHEREFORE, the Commission on Economic Opportunity respectfully requests that the Commission:

1. Receive for filing and docket this Petition to Intervene in order that CEO be a party to such proceedings and be placed on all service lists.
2. Grant to CEO active party status with the right to participate in all proceedings relative to this matter.
3. Order that the following individual be designated as CEO's recipient for service:  

Joseph L. Vullo, Esquire  
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4. Order that each party to the proceedings provide CEO's designated recipient with copies of all papers filed.
5. Grant such other relief as the Commission may deem necessary and proper.

Respectfully submitted,



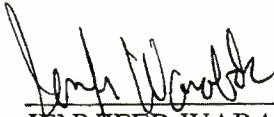
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**VERIFICATION**

I, Jennifer Warabak, Executive Director of Commission on Economic Opportunity, 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.

COMMISSION ON ECONOMIC  
OPPORTUNITY

  
\_\_\_\_\_  
JENNIFER WARABAK  
Executive Director

Dated: 11/21/2023

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

PENNSYLVANIA PUBLIC UTILITY COMMISSION,	:		
	:		
	:		
V.	:	Docket No.	R-2023-3043189 (Water)
	:		R-2023-3043190 (Wastewater)
PENNSYLVANIA-AMERICAN WATER COMPANY	:		
	:		

**CERTIFICATE OF SERVICE**

The undersigned certified that he served a copy of the foregoing Petition to Intervene of Commission on Economic Opportunity upon the following participants this 21<sup>st</sup> day of November, 2023, via electronic mail:

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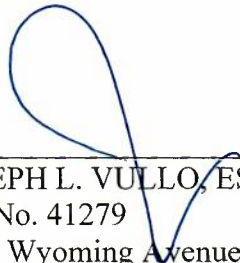
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