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**VIA eFILING**

November 30, 2023

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

**Re: *Pennsylvania Public Utility Commission v. Pennsylvania-American  
Water Company / Docket Nos. R-2023-3043189 (water)  
R-2023-3043190 (wastewater)***

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**

Pennsylvania Public Utility Commission	:	
vs.	:	Docket No. R-2023-3043189 (Water)
	:	R-2023-3043190 (Wastewater)
Pennsylvania American Water Company	:	

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**PETITION TO INTERVENE OF  
CLEVELAND-CLIFFS STEEL**

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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  
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[jkylercohn@bkllawfirm.com](mailto: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](mailto:kboehm@bkllawfirm.com) and [jkylercohn@bkllawfirm.com](mailto: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 water service will 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 rate increase is insufficient to establish that the rates to be collected are just and reasonable. Cleveland-Cliffs also alleges that the rate structure proposed by the Company may result in unwarranted subsidies.

7. Cleveland-Cliffs is in the process of engaging local counsel and will submit 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.

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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: November 30, 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 30<sup>th</sup> day of November, 2023.

/s/ Kurt J. Boehm

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