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June 27, 2024

VIA ELECTRONIC FILING

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
P.O. Box 3265
Harrisburg, PA 17105-3265

RE: *Pennsylvania Public Utility Commission, et al. v. Aqua Pennsylvania
Wastewater, Inc. Docket No. R-2024-3047824*

Dear Secretary Chiavetta:

Enclosed for electronic filing please find SCH USA, LLC's Petition to Intervene with regard to the above-referenced matter. Copies to be served in accordance with the attached Certificate of Service.

Thank you for your attention to this matter.

Sincerely,

/s/ Renardo L. Hicks

Renardo L. Hicks
Lauren Burge
Bryce R. Beard

RLH/jls
Enclosures

cc: Hon. Gail M. Chiodo w/enc.
Hon. Alphonso Arnold III w/enc.
Cert. of Service w/enc.

CERTIFICATE OF SERVICE

I hereby certify that this day I served a true and correct copy of SCH USA, LLC's Petition to Intervene upon the following persons, in the manner indicated, in accordance with the requirements of 52 Pa. Code § 1.54.

VIA E-MAIL

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/s/ Renardo L. Hicks

Renardo L. Hicks, Esquire

Date: June 27, 2024

The Split Rock Resort receives wastewater service from Aqua, and as such SCH USA is an Aqua wastewater customer.

5. SCH USA's attorneys in this matter are:

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6. The Commission's regulations allow intervention where a person has an interest in the proceeding which may be directly affected and which is not adequately represented by existing parties, and as to which the person may be bound by the action of the Commission in the proceeding. 52 Pa. Code § 5.72(a)(2). Intervention is also permitted where participation of the person may be in the public interest. 52 Pa. Code § 5.72(a)(3).

7. SCH USA receives non-residential wastewater service from Aqua in Rate Zone 4. Additionally, as an unmetered customer, SCH USA is currently billed by Aqua on a per Equivalent Dwelling Unit ("EDU") basis.

8. SCH USA meets the standards for intervention set forth in 52 Pa. Code § 5.72(a). As the owner of a large commercial resort property that is currently billed for unmetered service on a per EDU basis, SCH USA possesses a substantial interest which may be directly affected by the outcome of this proceeding. Further, SCH USA's interest is unique from and not adequately represented by existing participants, and as to which it will be bound by the action of the Commission in the proceeding. Under Aqua's proposals, SCH USA's wastewater rates would be significantly increased, thereby affecting the operations of the Split Rock Resort property.

9. The scope of issues that SCH USA intends to examine and potentially address in this proceeding include the amount of Aqua’s proposed rate increase, as well as the method by which SCH USA, as an unmetered customer, is charged for wastewater service. In addition, SCH USA plans to review issues raised by other parties during the proceeding and consider the impact of any alternative proposals on SCH USA’s existing and future rates.

WHEREFORE, SCH USA respectfully requests that the Commission grant this Petition to Intervene and that SCH USA be afforded full party status in this proceeding.

Respectfully submitted,

/s/ Renardo L. Hicks

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Dated: June 27, 2024

Counsel for SCH USA, LLC

Verification

I, Carlos R. Padilla, hereby state that: (1) I am the Senior Counsel for SCH USA, LLC (“SCH USA”) and that as such I am authorized to make this verification on its behalf; (2) the facts set forth in SCH USA’s Petition to Intervene are true and correct (or are true and correct to the best of my knowledge, information and belief); and (3) I expect to be able to prove the same at a hearing held in this matter. I understand that the statements here in are made subject to the penalties of 18 Pa. C.S. § 4904, relating to unsworn falsification to authorities.

Date: June 27, 2024

/s/ Carlos R. Padilla

Carlos R. Padilla
Senior Counsel
SCH USA, LLC