

DOUGLAS, JOSEPH & OLSON

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June 11, 2024

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

Re: Application of Aqua Pennsylvania Wastewater, Inc. (hereinafter referred to as "Aqua" or "Applicant") pursuant to Sections 1102 and 1329 of the Public Utility Code for: (1) approval of the acquisition by Aqua of the wastewater system assets of the Greenville Sanitary Authority (GSA) situated within the Borough of Greenville, Hempfield Township, and West Salem Township, Mercer County, Pennsylvania; (2) approval of the right of Aqua to begin to offer, render, furnish and supply wastewater service to the public in the Borough of Greenville, Hempfield Township and West Salem Township, Mercer County, Pennsylvania; and (3) an order approving the acquisition that includes the ratemaking rate base of the GSA wastewater system assets pursuant to Section 1329 (c)(2) of the Public Utility Code. Request for Approval of Contracts, including Assignments of Contracts, between Aqua and the GSA, pursuant to Section 507 of the Public Utility Code
Docket No.: A-2023-3041695

Dear Secretary Chiavetta:

Attached for filing please find a Petition to Intervene on behalf of both the Greenville Municipal Authority and the Borough of Greenville, a/k/a, the Town of Greenville in the above-referenced proceeding.

Copies have been served upon the parties as indicated on the enclosed Certificate of Service.

Respectfully submitted,

DOUGLAS, JOSEPH & OLSON



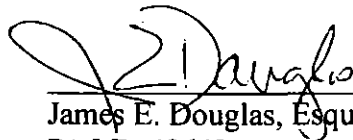
James E. Douglas, Esq.
Counsel for the Borough of Greenville
PA Attorney I.D. #49643

JED/rd
Enclosure

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

NOTICE TO PLEAD

YOU ARE HEREBY ADVISED THAT, PURSUANT TO 52 PA. CODE § 5.66, YOU MAY ANSWER THE ENCLOSED PETITION TO INTERVENE WITHIN TWENTY (20) DAYS OF THE DATE OF SERVICE HEREOF. YOUR ANSWER TO THE PETITION TO INTERVENE MUST BE FILED WITH THE SECRETARY OF THE PENNSYLVANIA PUBLIC UTILITY COMMISSION, P.O. BOX 3265, HARRISBURG, PA 17105-3265. A COPY SHOULD ALSO BE SERVED ON THE UNDERSIGNED COUNSEL FOR THE MUNICIPAL AUTHORITY OF THE BOROUGH OF GREENVILLE.



James E. Douglas, Esquire
PA I.D. 49643

DOUGLAS, JOSEPH, & OLSON
409 N. Hermitage Road
Hermitage, PA 16148
jedouglas@douglasjoseph.com

Dated: 6-11-2024

RCVD PUC SEC BUR
JUN 17 2024 AM 10:57

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

Application of Aqua Pennsylvania Wastewater, Inc. (hereinafter referred to as "Aqua" or "Applicant") pursuant to Sections 1102 and 1329 of the Public Utility Code for: (1) approval of the acquisition by Aqua of the wastewater system assets of the Greenville Sanitary Authority ("GSA") situated within the Borough of Greenville, Hempfield Township, and West Salem Township, Mercer County, Pennsylvania; (2) approval of the right of Aqua to begin to offer, render, furnish and supply wastewater service to the public in the Borough of Greenville, Hempfield Township, and West Salem Township, Mercer County, Pennsylvania; and (3) an Order approving the acquisition that includes the ratemaking rate base of the GSA wastewater system assets pursuant to Section 1329 (c) (2) of the Public Utility Code. Request for Approval of Contracts, including Assignments of Contracts, between Aqua and the GSA, Pursuant to Section 507 of the Public Utility Code.

Docket No.: A-2023-3041695

PETITION TO INTERVENE

ON BEHALF OF THE BOROUGH OF GREENVILLE

Pursuant to 52 PA Code §§ 5.71, 5.72, and 5.74, the Borough of Greenville of Mercer County, organized under the laws of the Commonwealth of Pennsylvania ("Greenville Borough"), by and through its attorneys, James E. Douglas and Douglas, Joseph, & Olson, hereby files with the Pennsylvania Public Utility Commission (the "Commission") this Petition to Intervene in the above-captioned application of Aqua Pennsylvania Wastewater, Inc. ("Aqua") for approval of (1) acquisition by Aqua of the sanitary system assets operated by the Borough of Greenville, and

owned by the Greenville Municipal Authority, situated within the Borough of Greenville, Mercer County, Pennsylvania, (2) the rights of Aqua to offer, render, furnish services to the public in Greenville Borough, Mercer County, Pennsylvania, (3) an Order approving the acquisition that includes the ratemaking rate base pursuant to Section 1329 (c) (2) of the Public Utility Code.

The Application directly affects the interests of the Borough of Greenville, which interests are not adequately represented by any exiting Party. For the reasons that follow, The Borough of Greenville respectfully requests that the Commission grant its Petition to Intervene, and in support thereof avers as follows:

1. The Borough of Greenville is located in, Greenville, Mercer County, Pennsylvania, with a business address of 125 Main Street, Greenville, Pennsylvania 16125.
2. The Borough of Greenville operates the Sanitary sewer treatment and distribution system ("The System") that provides services to various customers in the Borough of Greenville, Mercer County, Pennsylvania and neighboring communities.
3. The Borough of Greenville supports the Application filed by Aqua.
4. The Borough of Greenville seeks Intervention in the proceeding for due cause shown as follows:
 - a) The Borough is currently operating the System pursuant to a lease; and
 - b) The Borough may eventually receive the proceeds of the sale of the System.
5. The Borough of Greenville has a substantial and bona fide interest in the subject matter of this Applicant and its interests cannot be represented or protected adequately by other Parties.

6. As a Party to the APA, The Borough of Greenville submits that its Intervention is in the public's interest.
7. The Borough of Greenville intends to play an active role in the Commission's decision-making process and its participation herein will not unduly prejudice any Party.

WHEREFORE, The Borough of Greenville respectfully requests that the Commission grant the instant Petition to Intervene in this proceeding.

Respectfully Submitted,



James E. Douglas, Esquire
PA I.D. 49643

DOUGLAS, JOSEPH, & OLSON
409 N. Hermitage Road
Hermitage, PA 16148
jedouglas@douglasjoseph.com

Dated: 6-11-2024

RCVD PUC SEC BUR
JUN 17 2024 AM 10:56

VERIFICATION

I, Paul Hamill, the Mayor of the Borough of Greenville, hereby verify that the statements of fact made in the foregoing Petition are true and correct to the best of my knowledge, information and belief and that I expect to be able to prove the same at a hearing held in this matter. I understand that the statements made herein are subject to the penalties of 18 PA C.S. § 4904 (relating to unsworn falsification to authorities).


Paul Hamill, Mayor

Dated 6/6/24

CERTIFICATE OF SERVICE

Application of Aqua Pennsylvania Wastewater, Inc. :
(hereinafter referred to as "Aqua" or "Applicant") :
pursuant to Sections 1102 and 1329 of the Public :
Utility Code for: (1) approval of the acquisition :
by Aqua of the wastewater system assets of the :
Greenville Sanitary Authority (GSA) situated :
within the Borough of Greenville, Hempfield :
Township, and West Salem Township, Mercer :
County, Pennsylvania; (2) approval of the right :
of Aqua to begin to offer, render, furnish and :
supply wastewater service to the public in the :
Borough of Greenville, Hempfield Township, :
and West Salem Township, Mercer County, :
Pennsylvania; and (3) an order approving the :
acquisition that includes the ratemaking rate :
base of the GSA wastewater system assets :
pursuant to Section 1329 (c)(2) of the Public :
Utility Code. Request for Approval of Contracts, :
including Assignments of Contracts, between :
Aqua and the GSA, pursuant to Section 507 of :
the Public Utility Code :

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Docket No.: A-2023-3041695

I hereby certify that I have this day served true copies of the following documents, Petitions to Intervene, on behalf of the Greenville Sanitary Authority and the Borough of Greenville, upon the 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 11th day of June, 2024.

SERVICE BY E-MAIL ONLY

Allison C. Kaster, Esquire
Richard A. Kanaskie, Esquire
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rkanaskie@pa.gov
Counsel for I&E

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Rebecca Lyttle, Esquire
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relyttle@pa.gov
Counsel for OBSA

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Saul Ewing, LLP
1500 Market Street
Centre Square West, 38th Floor
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Counsel for Aqua Pennsylvania Wastewater, Inc.

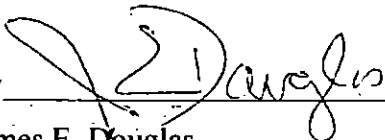
Rosemary Chiavetta, Secretary
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Paul Diskin, Director
Darren Gill, Deputy Director
Daniel Searfoorce, Manager
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Hon. Charles E. Rainey, Jr.
Chief Administrative Law Judge
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17120
crainey@pa.gov

Gina L. Miller, Esq
Office of consumer Advocate
555 Walnut Street
5th floor, forum Place
Harrisburg, PA 17101-1923
GMiller@paoca.org

By  _____
James E. Douglas

On behalf of the Greenville Sanitary Authority and
The Borough of Greenville

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Hermitage, PA 16148

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PA Attorney ID # 49643

(724) 981-7333

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Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
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