

COMMONWEALTH OF PENNSYLVANIA



PATRICK M. CICERO
Consumer Advocate

OFFICE OF CONSUMER ADVOCATE
555 Walnut Street, 5th Floor, Forum Place
Harrisburg, Pennsylvania 17101-1923
(717) 783-5048
(800) 684-6560

 @pa_oca
 /pennoca
FAX (717) 783-7152
consumer@paoca.org
www.oca.pa.gov

July 15, 2024

Via Electronic Filing

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

Re: Joint Application of Deer Haven, LLC and
PL Utilities, LLC
Docket Nos. A-2024-3049587
A-2024-3049591

Dear Secretary Chiavetta:

Attached for electronic filing please find the Office of Consumer Advocate's Notice of Intervention and Public Statement, in the above-referenced proceeding.

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

Respectfully submitted,

/s/ Melanie Joy El Atieh
Melanie Joy El Atieh
Deputy Consumer Advocate
PA Attorney I.D. # 209323
MElAtieh@paoca.org

Enclosures

cc: Office of Administrative Law Judge (email only: crainey@pa.gov)
Paul Diskin, Technical Utility Services (email only: pdiskin@pa.gov)
Daniel Searfoorce, Technical Utility Services (email only: dsearfoorc@pa.gov)
Sean Donnelly, Technical Utility Services (email only: sdonnelly@pa.gov)
Paul Zander, Technical Utility Services (email only: pzander@pa.gov)
Office of Special Assistants (email only: ra-OSA@pa.gov)
Certificate of Service

CERTIFICATE OF SERVICE

Joint Application of Deer Haven, LLC and PL Utilities, LLC for approval of: (1) PL Utilities, LLC’s acquisition of certain wastewater system assets of the Deer Haven, LLC; (2) the abandonment by Deer Haven, L.L.C. of wastewater service to the public in Palmyra Township, Pike County Pennsylvania; and (3) PL Utilities, LLC to offer, render, furnish and supply wastewater service to the public in portions of Palmyra Township, Pike County, Pennsylvania :

Docket Nos. A-2024-3049587
A-2024-3049591

I hereby certify that I have this day filed electronically on the Commission’s electronic filing system and served a true copy of the following document, the Office of Consumer Advocate’s Notice of Intervention, upon 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 15th day of July 2024.

SERVICE BY E-MAIL ONLY

<p>Allison Kaster, Director Bureau of Investigation & Enforcement 400 North Street, 2nd Floor West Harrisburg, PA 17105-3265 akaster@pa.gov <i>Bureau of Investigation & Enforcement</i></p> <p>Mark J. Shaw MacDonald, Illig, Jones & Britton LLP 100 State Street, Suite 700 Erie, PA 16507-1459 mshaw@mijb.com <i>Counsel to PL Utilities</i></p> <p><i>Counsel for:</i> Office of Consumer Advocate 555 Walnut Street 5th Floor, Forum Place Harrisburg, PA 17101-1923 717-783-5048</p> <p>Dated: July 15, 2024</p>	<p>Sharon E. Webb, Esquire Office of Small Business Advocate 555 Walnut Street, 1st Floor Harrisburg, PA 17101 swebb@pa.gov <i>Office of Small Business Advocate</i></p> <p>Adeolu A. Bakare, Esquire McNees Wallace & Nurick LLC 100 Pine Street P. O. Box 1166 Harrisburg, PA 17108-1166 abakare@mcneeslaw.com <i>Counsel to Deer Haven</i></p> <p><i>/s/ Melanie Joy El Atieh</i> Melanie Joy El Atieh Deputy Consumer Advocate PA Attorney I.D. # 209323 MElAtieh@paoca.org</p>
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BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Joint Application of Deer Haven, LLC and	:	
PL Utilities, LLC for approval of: (1) PL	:	
Utilities, LLC's acquisition of certain	:	
wastewater system assets of the Deer Haven,	:	
LLC; (2) the abandonment by Deer Haven,	:	Docket Nos. A-2024-3049587
L.L.C. of wastewater service to the public in	:	A-2024-3049591
Palmyra Township, Pike County	:	
Pennsylvania; and (3) PL Utilities, LLC to	:	
offer, render, furnish and supply wastewater	:	
service to the public in portions of Palmyra	:	
Township, Pike County, Pennsylvania	:	

NOTICE OF INTERVENTION

Pursuant to 52 Pa. Code Section 5.71(a) and 71 P.S. § 309-4, the Office of Consumer Advocate hereby gives Notice of Intervention in the above-captioned proceeding. A copy of all correspondence and notices, documents, orders or other communications with respect to the above-captioned proceeding should be addressed to the following:

Melanie Joy El Atieh
Deputy Consumer Advocate
Office of Attorney General
Office of Consumer Advocate
555 Walnut Street 5th Floor, Forum Place
Harrisburg, PA 17101-1923

Respectfully submitted,

/s/ Melanie Joy El Atieh
Melanie Joy El Atieh
PA Attorney I.D. #209323

DATED: July 15, 2024

PUBLIC STATEMENT OF THE
OFFICE OF CONSUMER ADVOCATE
PURSUANT TO 71 P.S. SECTION 309-4(e)

Act 161 of the Pennsylvania General Assembly, 71 P.S. § 309-2, as enacted July 9, 1976, authorizes the Consumer Advocate to represent the interests of consumers before the Pennsylvania Public Utility Commission (PUC or Commission). In accordance with Act 161, and for the following reasons, the Consumer Advocate determined to file an Intervention and participate in proceedings before the Commission involving the Application by Deer Haven L.L.C. (Deer Haven) and PL Utilities (PLU), collectively “Joint Applicants.”

The Joint Applicants seek Commission approval for PLU to acquire certain wastewater system assets of Deer Haven and provide wastewater collection and treatment service to the 61 existing residential customers of the system, located in Palmyra Township, Pike County, Pennsylvania. The Joint Applicants additionally seek approval for Deer Haven to abandon service.

The Office of Consumer Advocate will participate in this proceeding to ensure that adequate and continuous service is provided to Deer Haven’s customers at just and reasonable rates and in accordance with applicable statutes, and that the proposed transaction provides all necessary and proper customer protections which are justified, reasonable, and in accordance with sound ratemaking principles and the Public Utility Code.