



COMMONWEALTH OF PENNSYLVANIA

August 13, 2024

E-FILED

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

Re: Petition of Hanover Municipal Water Works for Approval of its Lead Service Line Replacement Program / Docket No. P-2024-3050231

Dear Secretary Chiavetta:

Enclosed please find the Notice of Intervention, Public Statement and Verification, on behalf of the Office of Small Business Advocate (“OSBA”), in the above-captioned proceeding.

Copies will be served on all known parties in this proceeding, as indicated on the attached Certificate of Service.

If you have any questions, please do not hesitate to contact me.

Sincerely,

/s/ Steven C. Gray

Steven C. Gray
Senior Attorney
Assistant Small Business Advocate
Attorney ID No. 77538

Enclosures

cc: Parties of Record

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of Hanover Municipal Water Works for Approval of its Lead Service Line Replacement Program : **Docket No. P-2024-3050231**
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**NOTICE OF INTERVENTION
OF THE OFFICE OF SMALL BUSINESS ADVOCATE**

The Office of Small Business Advocate (“OSBA”) files this Notice of Intervention with respect to the Borough of Hanover – Hanover Municipal Water Works Petition for Extension of Time to Submit Lead Service Line Replacement Program that was filed with the Pennsylvania Public Utility Commission (“Commission”) on July 22, 2024. In support of this Notice of Intervention, the OSBA avers as follows:

1. The OSBA is an agency of the Commonwealth of Pennsylvania authorized by the Small Business Advocate Act (Act 181 of 1988, 73 P.S. §§ 399.41 - 399.50) to represent the interest of small business consumers as a party in proceedings before the Commission.

2. Representing the OSBA in this proceeding is:

Steven Gray, Esq.
Senior Attorney
Assistant Small Business Advocate
Office of Small Business Advocate
Forum Place
555 Walnut Street, 1st Floor
Harrisburg, PA 17101
(717) 783-2525
sgray@pa.gov

Respectfully submitted,

/s/ Steven C. Gray

Steven C. Gray
Senior Attorney
Assistant Small Business Advocate
Attorney I.D. No. 77538

For: NazAarah Sabree
Small Business Advocate

Commonwealth of Pennsylvania
Office of Small Business Advocate
Forum Place
555 Walnut Street, 1st Floor
Harrisburg, PA 17101

Date: August 13, 2024

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of Hanover Municipal Water Works for Approval of its Lead Service Line Replacement Program : **Docket No. P-2024-3050231**
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**PUBLIC STATEMENT OF
THE OFFICE OF SMALL BUSINESS ADVOCATE**

The Small Business Advocate is authorized and directed to represent the interest of small business consumers of utility services in Pennsylvania under the provisions of the Small Business Advocate Act, Act 181 of 1988, 73 P.S. §§ 399.41 - 399.50 (the “Act”). The Act further provides that the Small Business Advocate is to issue publicly a written statement stating concisely the specific interest of small business consumers to be protected by her initiation of or intervention in any proceeding involving those interests before the Public Utility Commission or any other agency or court. This public statement relates to the filing today by the Small Business Advocate of a Notice of Intervention (“NOI”) in the Borough of Hanover – Hanover Municipal Water Works (“Hanover” or the “Company”) Petition for Extension of Time to Submit Lead Service Line Replacement Program (“Petition”) that was filed with the Pennsylvania Public Utility Commission (“Commission”) on July 22, 2024. The Petition requests an extension until December 19, 2024, for Hanover to file its Lead Service Line Replacement (“LSLR”) Plan.

The Small Business Advocate files this NOI to protect the interests of Hanover’s small business customers that could be affected by the request set forth in the Petition and the subsequent LSLR Plan.

The Small Business Advocate will participate in proceedings before the Public Utility Commission to investigate the reasonableness of proposals set forth in the Petition and the subsequent LSLR Plan. The Small Business Advocate will ask the Commission to deny any aspect of the Petition and subsequent LSLR Plan that are not proven to be lawful, just, reasonable, and non-discriminatory.

Dated: August 13, 2024

VERIFICATION

I, NazAarah Sabree, hereby state that the facts set forth herein above 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 herein are made subject to the penalties of 18 Pa. C.S. § 4904 (relating to unsworn falsification to authorities).

Date: August 13, 2024



(Signature)

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of Hanover Municipal Water Works for Approval of its Lead Service Line Replacement Program : **Docket No. P-2024-3050231**
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CERTIFICATE OF SERVICE

I hereby certify that true and correct copies of the foregoing have been served via email (*unless otherwise noted below*) upon the following persons, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

The Honorable Charles E. Rainey
Chief Administrative Law Judge
Administrative Law Judge
Pennsylvania Public Utility Commission
400 North Street
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iwakefield@salzmannhughes.com

DATE: August 13, 2024

/s/ Steven C. Gray
Steven C. Gray
Senior Attorney
Assistant Small Business Advocate
Attorney I.D. No. 77538