



COMMONWEALTH OF PENNSYLVANIA

August 23, 2024

E-FILED

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

Re: Petition of the Elverson Water Company, Inc. for a Time Extension to Submit a Lead Service Line Replacement Program / Docket No. P-2024-3050472

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/ Rebecca Lyttle

Rebecca Lyttle
Assistant Small Business Advocate
Attorney ID No. 201399

Enclosures

cc: Parties of Record

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of the Elverson Water Company, : Docket No. P-2024-3050472
Inc. for a Time Extension to Submit a :
Lead Service Line Replacement Program :

**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 Petition of the Elverson Water Company, Inc.’s (Elverson Water) waiver of Certain Regulations that was filed with the Pennsylvania Public Utility Commission (“Commission”) on July 31, 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:

Rebecca Lyttle, Esq.
Assistant Small Business Advocate
Office of Small Business Advocate
Forum Place
555 Walnut Street, 1st Floor
Harrisburg, PA 17101
(717) 783-2525
relyttle@pa.gov

Respectfully submitted,

/s/ Rebecca Lyttle
Rebecca Lyttle
Assistant Small Business Advocate
Attorney I.D. No. 201399

For: NazAarah Sabree
Small Business Advocate

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

Date: August 23, 2024

**BEFORE THE
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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 (“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 in the above-captioned Commission proceeding.

On July 31, 2024, the Elverson Water Company, Inc. (“Elverson Water” and/or “Company”) filed the above captioned document (Petition) with the Pennsylvania Public Utility Commission requesting a time extension to file its Lead Service Line Replacement Program (“LSLR Program”). Pursuant to Section 65.55(a) of Title 52, 52 Pa. Code § 65.55(a), a Class B public utility, Class C public utility or municipal corporation is to file a LSLR program within two years of the effective date of the section, or by July 22, 2024. Through the Petition, Elverson Water requested that the deadline be extended to November 19, 2024, to allow Elverson Water

the additional time needed to accumulate the required information and to design its LSLR Program. The request to extend the due date for Elverson Water to file a LSLR program petition to November 19, 2024, was granted by the Commission.

The Small Business Advocate is intervening in this proceeding to protect the interests of Elverson Water's small business customers. A thorough inquiry by the Commission into all the elements of the Petition is necessary to ascertain whether the Company's request conforms to the Public Utility Code and to the Commission's regulations.


In view of the foregoing, the Small Business Advocate is requesting that the Petition be either denied or subject to investigation and evidentiary hearings before the Commission. The Small Business Advocate will ask the Commission to deny or modify any aspect of the Company's proposals that are not proven by it to be just, reasonable, non-discriminatory, and fully in accordance with the Public Utility Code and the Commission's regulations regarding Lead Service Line Replacements.

Dated: August 23, 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 23, 2024



(Signature)

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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 Jr.
Chief Administrative Law Judge
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Merle W. Stoltzfus
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DATE: August 23, 2024

/s/ Rebecca Lyttle
Rebecca Lyttle
Assistant Small Business Advocate
Attorney I.D. No. 201399