



**Teresa K. Harrold**  
Director, Corporate Counsel  
852 Wesley Drive | Mechanicsburg, PA 17055  
Phone: 717-550-1562 | Fax: 717-550-1255  
[teresa.harrold@amwater.com](mailto:teresa.harrold@amwater.com)

September 12, 2024

**VIA ELECTRONIC FILING**

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

**In re: Joint Application of Pennsylvania-American Water Company and Towamencin Township under Sections 1102(a) and 1329 of the Pennsylvania Public Utility Code, 66 Pa C.S. §§ 1102(a) and 1329, for approval of (1) PAWC’s acquisition of substantially all of the assets, properties and rights related to the wastewater collection and treatment system owned and operated by Towamencin Township and Towamencin Municipal Authority; (2) Towamencin Township’s sale of the assets, properties and rights related to its wastewater collection and treatment system located in a portion of Worcester Township, Lower Salford Township and bulk customers that interconnect to the Township sewer system outside of the Township’s geographic boundaries; (3) the rights of Pennsylvania-American Water Company to begin to offer or furnish wastewater service to the public in the Township of Towamencin and portions of the Townships of Franconia, Lower Salford and Worcester and the Borough of Lansdale, all in Montgomery County, Pennsylvania; and (4) the abandonment of wastewater service by Towamencin Township in a portion of Worcester Township, Lower Salford Township and bulk customers that interconnect to the Township sewer system outside of the Township’s geographic boundaries**

**Docket No: A-2023-3039900, *et. al.***

Dear Secretary Chiavetta:

On May 15, 2023, Pennsylvania-American Water Company (“Pennsylvania-American”) filed an initial application in the above-referenced proceeding at the Pennsylvania Public Utility Commission (“Commission”). On April 12, 2024, Pennsylvania-American amended the initial application to, among other things, add Towamencin Township (“Towamencin”) as a party to the application (“Joint Application”). The Commission has not yet accepted the Joint Application and no Administrative Law Judge (“ALJ”) has been assigned to this matter.

On September 11, 2024, Pennsylvania-American and Towamencin (jointly, the “Parties”) mutually agreed to terminate the underlying transaction that is the subject of this proceeding.

Rosemary Chiavetta, Secretary

September 12, 2024

Page 2

Re: Letter in lieu of Petition to Withdraw Joint Application

Because the Joint Application has not been accepted by the Commission and no ALJ has been assigned, the Parties do not consider this matter to be a contested proceeding. Accordingly, the Parties submit this letter in lieu of a formal petition seeking leave to withdraw the Joint Application. If no party objects to this letter within the next 10 days, the Parties respectfully request that the Commission authorize withdrawal of the Joint Application and close the above-referenced dockets consistent with 52 Pa. Code § 1.82.

Should you have any questions, please feel free to contact me.

Respectfully submitted,

*Elizabeth Preate Havey*

James J. Rodgers, Esquire (PA ID #21635)

Elizabeth Preate Havey, Esquire (PA ID #80793)

Marc A. Feller, Esquire (PA ID #19545)

Dilworth Paxson LLP

1500 Market Street, Suite 3500E

Philadelphia, PA 19102

Phone: (215) 575-7143

Email: [jrogers@dilworthlaw.com](mailto:jrogers@dilworthlaw.com)

Email: [epreatehavey@dilworthlaw.com](mailto:epreatehavey@dilworthlaw.com)

Email: [mfeller@dilworthlaw.com](mailto:mfeller@dilworthlaw.com)

**Attorneys for Towamencin Township**

Dated: September 12, 2024



Teresa K. Harrold, Esquire (PA ID #311082)

Director, Corporate Counsel

Pennsylvania-American Water Company

852 Wesley Drive

Mechanicsburg, PA 17055

Phone: (717) 550-17055

Email: [Teresa.Harrold@amwater.com](mailto:Teresa.Harrold@amwater.com)

David P. Zambito, Esquire (PA ID #80017)

Jonathan P. Nase, Esquire (PA ID #44003)

Cozen O'Connor

17 North Second Street, Suite 1410

Harrisburg, PA 17101

Phone: (717) 703-5892

Email: [dzambito@cozen.com](mailto:dzambito@cozen.com)

Email: [jnase@cozen.com](mailto:jnase@cozen.com)

**Attorneys for Pennsylvania-American  
Water Company**

cc: All Parties on the attached Certificate of Service (via electronic mail)

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

In re: Joint Application of Pennsylvania-American Water Company and Towamencin Township under Sections 1102(a) and 1329 of the Pennsylvania Public Utility Code, 66 Pa C.S. §§ 1102(a) and 1329, for approval of (1) PAWC's acquisition of substantially all of the assets, properties and rights related to the wastewater collection and treatment system owned and operated by Towamencin Township and Towamencin Municipal Authority; (2) Towamencin Township's sale of the assets, properties and rights related to its wastewater collection and treatment system located in a portion of Worcester Township, Lower Salford Township and bulk customers that interconnect to the Township sewer system outside of the Township's geographic boundaries; (3) the rights of Pennsylvania-American Water Company to begin to offer or furnish wastewater service to the public in the Township of Towamencin and portions of the Townships of Franconia, Lower Salford and Worcester and the Borough of Lansdale, all in Montgomery County, Pennsylvania; and (4) the abandonment of wastewater service by Towamencin Township in a portion of Worcester Township, Lower Salford Township and bulk customers that interconnect to the Township sewer system outside of the Township's geographic boundaries

Docket No. A-2023-3039900, *et al.*

**CERTIFICATE OF SERVICE**

I hereby certify that I have served a true copy of the foregoing Letter in lieu of Petition to Withdraw Joint Application, upon the parties, listed below in accordance with the requirements of 52 Pa. Code §1.54 (relating to service by a party).

**SERVICE BY E-MAIL ONLY**

Carrie B. Wright  
Prosecutor  
Pennsylvania Public Utility Commission  
Bureau of Investigation and Enforcement  
Commonwealth Keystone Building  
400 North Street  
Harrisburg, PA 17120  
[carwright@pa.gov](mailto:carwright@pa.gov)  
(VIA electronic mail)


Sharon E. Webb  
Assistant Small Business Advocate  
Commonwealth of Pennsylvania  
Office of Small Business Advocate  
555 Walnut Street, 1st Floor  
Harrisburg, PA 17101  
[swebb@pa.gov](mailto:swebb@pa.gov)  
(VIA electronic mail)

Christopher M. Andreoli  
Assistant Consumer Advocate  
Darryl A. Lawrence  
Senior Assistant Consumer Advocate  
Harrison W. Breitman  
Assistant Consumer Advocate  
Office of Consumer Advocate  
555 Walnut Street  
5th Floor, Forum Place  
Harrisburg, PA 17101-1923  
[candreoli@paoca.org](mailto:candreoli@paoca.org)  
[dlawrence@paoca.org](mailto:dlawrence@paoca.org)  
[hbreitman@paoca.org](mailto:hbreitman@paoca.org)  
(*VIA* electronic mail)

James J. Rodgers, Esq.  
Elizabeth Preate Havey, Esq.  
Marc A. Feller, Esq.  
Dilworth Paxson LLP  
1500 Market Street Suite #3500e  
Philadelphia, PA 19102  
[jroddgers@dilworthlaw.com](mailto:jroddgers@dilworthlaw.com)  
[epreatehavey@dilworthlaw.com](mailto:epreatehavey@dilworthlaw.com)  
[mfeller@dilworthlaw.com](mailto:mfeller@dilworthlaw.com)  
(*VIA* electronic mail)

Dated: September 12, 2024

Lauren A. Gallagher, Esq.  
Patrick F. Seymour, Esq.  
Rudolph Clarke, LLC  
Seven Neshaminy Interplex, Ste. 200  
Trevose, PA 19053  
[lgallagher@rudolphclarke.com](mailto:lgallagher@rudolphclarke.com)  
[pseymour@rudolphclarke.com](mailto:pseymour@rudolphclarke.com)  
Counsel for Upper Gwynedd Township  
(*VIA* electronic mail)



---

Teresa K. Harrold, Esq. (PA ID # 311082)  
Director, Corporate Counsel  
Pennsylvania-American Water Company  
852 Wesley Drive  
Mechanicsburg, PA 17055  
Phone: (717) 550-1562  
E-mail: [teresa.harrold@amwater.com](mailto:teresa.harrold@amwater.com)

David P. Zambito, Esquire (PA ID 80017)  
Jonathan P. Nase, Esquire (PA ID 44003)  
Cozen O'Connor  
17 North Second Street, Suite 1410  
Harrisburg, PA 17101  
Phone: (717) 703-5892  
E-mail: [dzambito@cozen.com](mailto:dzambito@cozen.com)  
E-mail: [jnase@cozen.com](mailto:jnase@cozen.com)

Attorneys for  
*Pennsylvania-American Water Company*