

COMMONWEALTH OF PENNSYLVANIA



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September 25, 2024

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

Re: City of Lock Haven
Petition for Approval of
A Lead Service Line
Replacement Program
Docket No. P-2024-3050183

Dear Secretary Chiavetta:

Attached for electronic filing please find the Office of Consumer Advocate's Amended Notice of Intervention and Public Statement.

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

Very truly yours,

/s/ Harrison W. Breitman
Harrison W. Breitman, Esq.
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Enclosures:

cc: The Honorable Charles E. Rainey (email only)
Paul Diskin, BTUS (email only: pdiskin@pa.gov)
Office of Special Assistants (email only: ra-OSA@pa.gov)
Certificate of Service

CERTIFICATE OF SERVICE

City of Lock Haven :
Petition for Approval of :
A Lead Service Line : Docket No. P-2024-3050183
Replacement Program :

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 Amended Notice of Intervention and Public Statement in the above-referenced proceeding, 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 25th day of September, 2024.

SERVICE BY E-MAIL ONLY

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DATED: September 25, 2024

Respectfully submitted,

/s/ Harrison W. Breitman
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BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

City of Lock Haven :
Petition for Approval of :
A Lead Service Line : Docket No. P-2024-3050183
Replacement Program :

AMENDED NOTICE OF INTERVENTION
OF THE
OFFICE OF CONSUMER ADVOCATE

Pursuant to 52 Pa. Code § 5.71-74, the Office of Consumer Advocate (OCA) hereby gives Notice of Intervention in the above-captioned proceedings. The OCA opposes the City of Lock Haven’s Petition, as filed, and requests that the matter be referred to the Office of Administrative Law Judge so that appropriate proceedings can be held. A copy of all correspondence and notices, documents, orders or other communications with respect to the above-captioned proceeding should be addressed to the undersigned counsel.

Respectfully submitted,

/s/ Harrison W. Breitman
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Counsel for:
Patrick M. Cicero
Consumer Advocate

Dated: September 25, 2024

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

Act 161 of the Pennsylvania General Assembly, 71 P.S. Section 309-2, as enacted July 9, 1976, authorizes the Consumer Advocate to represent the interests of consumers before the Pennsylvania Public Utility Commission (Commission). In accordance with Act 161, and for the following reasons, the Consumer Advocate determined to file a Notice of Intervention in this proceeding before the Commission.

On July 19, 2024, the City of Lock Haven (Lock Haven or City) filed with the Commission a Petition seeking approval of a Lead Service Line Replacement Program (LSLR Program) and tariff revisions that will allow it to replace customer-owned lead service lines (COLSL), and to recover those costs as provided in Section 1311(b)(2) of the Public Utility Code, which was added to the Public Utility Code pursuant to Act 120 of 2018. 66 Pa. C.S. § 1311(b)(2).

The proposed LSLR program and plan will allow Lock Haven to recover the costs for LSL replacements, both City-owned and customer-owned, through its base rates and DSIC. 66 Pa. C.S. § 1311(b)(2). For customers, the LSLR plan has the potential to provide both financial and public health benefits.

The Consumer Advocate has determined that it is necessary to intervene in this proceeding to protect the interests of Lock Haven's customers. The Office of Consumer Advocate opposes the City of Lock Haven's Petition and requests that the matter be referred to the Office of Administrative Law Judge so that appropriate proceedings can be held. The Office of Consumer Advocate will seek to ensure that Lock Haven develops a fair and equitable way to implement its program so that the public health and safety issues are fully addressed.