

COMMONWEALTH OF PENNSYLVANIA



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Consumer Advocate

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September 25, 2024

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

Re: Pennsylvania American Water Co.
Petition for Approval of
A Lead Service Line
Replacement Program
Docket No. P-2024-3050263

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 William Breitman
Assistant Consumer Advocate
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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

Pennsylvania American Water Co. :
Petition for Approval of :
Lead Service Line : Docket No. P-2024-3050263
Replacement Program :

I hereby certify that I have this day served a true copy of the following document, the Office of Consumer Advocate’s Amended Notice of Intervention and Public Statement, in the above-captioned 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

Allison Kaster, Esq.
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Respectfully submitted,

/s/ Harrison W. Breitman
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Phone: (717) 783-5048
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DATED: September 25, 2024

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Pennsylvania American Water Co.	:	
Petition for Approval of	:	
Lead Service Line	:	Docket No. P-2024-3050263
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 Company'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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HBreitman@paoca.org

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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 22, 2024, Pennsylvania American Water Company (PAWC or Company) filed with the Commission a Petition seeking (1) the approval of PAWC's Lead Service Line Replacement Program (LSLR Program); (2) related tariff changes, and; (3) modifications to its Long-Term Infrastructure Improvement Plan.

The Consumer Advocate has determined that it is necessary to intervene in this proceeding to protect the interests of PAWC's customers. The Office of Consumer Advocate opposes the Company'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 the Company develops a fair and equitable way to implement its program so that the public health and safety issues are fully addressed.