

**607 Plum Run Drive  
West Chester, PA 19382**

Copy sent Via Email to: [RChiavetta@pa.gov](mailto:RChiavetta@pa.gov)

CERTIFIED MAIL: 7022 2410 0002 8250 6342

DATE OF DEPOSIT

October 11, 2024

OCT 10 2024

PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

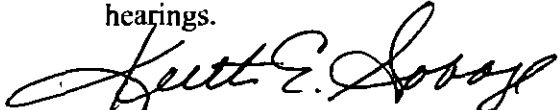
Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
P. O. Box 3265  
Harrisburg, PA 17105-3265

Re: Docket A-2022-3033138

Dear Secretary Rosemary Chiavetta,

Please accept this letter and its attachment as my Protest in connection with Aqua Pennsylvania, Inc's Application at the above referenced docket. This Protest includes my letter to you of October 4 as Exhibit 1.

Thank you in advance for your time and consideration, and I look forward to participating in any upcoming hearings.



Keith E. Gabage  
Aqua PA Water Customer

Enc. As Noted

cc: [carwright@pa.gov](mailto:carwright@pa.gov)  
[swebb@pa.gov](mailto:swebb@pa.gov)  
[mhassell@postschell.com](mailto:mhassell@postschell.com)  
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DATE OF DEPOSIT

OCT 10 2024

PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Application of Aqua Pennsylvania :  
Wastewater, Inc. pursuant to Sections 1102, :  
1329 and 507 of the Public Utility Code for : Docket No. A-2022-3033138  
Approval of its Application of the Wastewater :  
System Assets of the City of Beaver Falls :

PROTEST OF KEITH E. GABAGE

As a water customer of Aqua Pennsylvania, Inc. ("AQUA"), in response to receipt of the customer notice recently received (see Exhibit 1 at pages 4-5 attached), I file this protest pursuant to the relevant sections of 52 Pa. Code and 66 Pa. C.S. §§ 1101 and 1329. The topics discussed below are of concern to me at this time. They include i) sustainability and viability of 66 Pa. C.S. § 1329 ("Act 12"); ii) public benefit or lack thereof from both Act 12 and 66 Pa. C.S. 1311(c) ("Act 11"); iii) deficiency in public notice and billing information related to Act 11 and Act 12; and iv) the Public Utility Commission's ("PUC") Reasonableness Review Ratio to Act 12 pricing.

**Sustainability and viability of 66 Pa. C.S. § 1329 ("Act 12")**

First and foremost, it is important to note that both Act 11 and Act 12 were never necessary and secondly, do not advance a single public benefit to those served by AQUA. For this reason and in light of the pending attempts by the Pennsylvania legislature<sup>1</sup> to amend or repeal Act 12 in the 2023-2024 session; AQUA's Application should be denied unless the parties can amend their Asset Purchase Agreement ("APA") to allow for a purchase price equal to the depreciated original cost ("DOC") of the City of Beaver Falls ("COBF") wastewater system assets. Of course, AQUA could elect to pay something north of DOC (creating exposure to goodwill that could be mitigated via current longstanding rules, regulations and laws employed before pen was placed to paper in drafting both Acts 11 and 12) in lieu of what was required pursuant to the procurement process that led to its execution of the APA included in its' Application at issue. These longstanding rules, regulations and laws continue to be viable and have enabled AQUA to employ its growth through acquisition strategy with limited impact on its existing customers and newly acquired customers via its pre-Act 11 and 12

<sup>1</sup> <https://www.legis.state.pa.us/cfdocs/legis/CSM/showMemoPublic.cfm?chamber=H&SPick=20230&cosponId=40235>

acquisitions. Hence, AQUA was successful in implementing its growth through acquisition goals prior to Act 12 being signed into law in 2016, and for this reason suggests that Act 12 was never necessary to aid in fueling growth. Act 12 is analogous to AQUA paying to fuel its passenger vehicle with jet fuel in lieu of regular gas as recommended by the owner's manual.

At the end of 2022 COBF's net wastewater system assets were valued at just north of \$5.6 million<sup>2</sup>, yet AQUA's Act 12 purchase price is \$41.25 million or 7.37 times the value of these net assets. Put another way, AQUA is seeking to obtain a net income<sup>3</sup> (focusing on purchase price only) on this proposed acquisition is \$2.063 million with the employment of Act 12 (a voluntary process, see 66 Pa. C.S. §1329 (d)(1)) rather than \$280,000 under the historically modeled DOC approach. That said, if a municipal entity is truly sincere with its intention to exit the water or wastewater industry, is it good public policy to overwhelm the municipal entity's governing officials<sup>4</sup> with significantly higher purchase prices than otherwise employed historically by AQUA. These higher purchase prices benefit solely the taxpayers within the selling entity's municipal boundaries by creating capital surplus fund for the municipality such that it can avoid increasing taxes in the short-term or some unknown long-term period; all of which at the expense of AQUA's customers who too pay taxes to their local, county, state and federal governments.

In short, the process that AQUA participated in seems to have required that AQUA's bid be based upon Act 12 and AQUA therefore willingly volunteered (on behalf of its existing customers) to pay 7.37 times more than it otherwise would, but for the existence of Act 12. Seems to beg the question: Would COBF (and other that proceeded it and may follow) have entertained a process that would have resulted in a purchase price just north of DOC at AQUA's discretion and potential peril rather than \$41.25M? Suggested Answer: Probably not. Another question is whether or not there were any additional bids and, if so, what are the differences in Act 12 purchase price values and how do they compare with AQUA's \$41.25M? If they were lower, does that suggest that maybe ratemaking rate base should too be lower than \$41.25M.

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<sup>2</sup> It is recognized that this value may or may not include contributed property and potentially not include all wastewater system assets. Additionally, it is understood that depreciation could be restated and may (assuming no contributed property and all assets included in the \$5.6 million) result in a higher value for purposes of establishing DOC. See letter at Exhibit 1.

<sup>3</sup> Assumes 10% return on equity and that equity is 50% of purchase price (obviously closing costs and other related costs approved for inclusion in rate making rate base by the PUC as well as future capital investments by AQUA). Obviously the higher the purchase price the greater the need for more revenue to address higher interest and depreciation expenses to achieve the desired (as approved by the PUC in AQUA's rate cases) net income.

<sup>4</sup> My experience as a Business Developer with AQUA when dealing with a prospective acquisition was that two hurdles existed: i) AQUA's dividends, and ii) AQUA's higher rates. Therefore most seemed to consider selling when they were faced with a significant capital investment that may cause their rates to approach or surpass AQUA's then existing base rates. An example would be the need to construct a new treatment plant and future needs of replacing other assets.

Acts 11 and 12 are bad experiments advanced by our legislators at the expense of AQUA's existing and future customers. Our legislators fell short in their recent attempts to amend or repeal. When they revisit their proposed legislation, they should simply look to repeal both.

Because of the lack of clarity on the future of Acts 11 and 12, AQUA's Application at issue should be denied. However, if the PUC were to approve AQUA's Application it should not enable AQUA to seek a return on that portion of purchase price above the DOC of COBF's wastewater system assets. AQUA's return on that portion of the purchase price above DOC should instead be recovered (to include interest expense) from the customers connected to the COBF's system assets until those assets have either been fully depreciated or retired. Lastly, the PUC should note in its Order<sup>5</sup> that Act 11 not be applied for the benefit of the wastewater customers of the COBF system at anytime in the future.

#### **Public benefit or lack thereof from both Act 12 and 66 Pa. C.S. 1311(c) ("Act 11")**

AQUA owns and operates water and wastewater systems throughout more the 30 counties within the Commonwealth of Pennsylvania. At the end of 2023 AQUA served 456,018 water and 62,161 wastewater customers<sup>6</sup>. At the end of 2016 AQUA served 430,559 water and 20,440 wastewater customers.

Since January 1, 2017, a significant portion of AQUA's wastewater growth came from Act 12 acquisition such as **New Garden** (\$29.5M; 2,106 customers; A-2016-2580061); **Limerick** (\$75.1M; 5,434 customers; A-2017-2605434); **E. Bradford** (\$5M; 1,248 customers; A2018-3001582), **Cheltenham** (\$50.25M, 10,219 customers; A-2019-3008491), **East Norriton** (\$21M; 4,966 customers; A-2019-3009052), **Lower Makefield** (\$53M; 11,151 customers; A-2021-3024267); and **East Whiteland** (\$54.93M; 3,895 customers; A-2021-3026132). These 7 wastewater acquisitions totaled 39,019 customers (or 93.52% of customer growth from 2016 to the end of 2023) at a total Act 12 purchase price of \$288.78 million. AQUA earlier this year sent out another notice for the Greenville (A-2023-3041695) wastewater system serving 2,283 customers for \$18M and seems to also have a more significant and pending wastewater acquisition with the DELCORA (A-2019-3015173) wastewater system reportedly serving 165,000 customers<sup>7</sup> for \$276M. AQUA also

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<sup>5</sup> See 66 Pa. C.S. § 1329 (d)(3)(ii) as the PUC could include literally any "[a]dditional conditions of approval as may be required by the commission" in its Order approving an acquisition

<sup>6</sup> AQUA's 2023 PUC Annual Reports

<sup>7</sup> <https://delcopa.gov/publicrelations/releases/2022/delcoaguapafacts.html>

attempted to purchase the BCWSA wastewater system assets for \$1.1BILLION reportedly serving 75,000 customers<sup>8</sup>.

AQUA's only Act 12 water acquisition was Shenandoah (A-2022-3034143) serving 2,899 customers (or 11.39% of customer growth from 2016 to the end of 2023) for \$12M. AQUA has also attempted to acquire the Chester Water Authority ("CWA") in recent years via Act 12. This entity served approximately 45,000 customers at the end of 2023 and the purchase price was reported to be \$410M<sup>9</sup> in late 2021<sup>10</sup> and likely in excess of \$150M north of DOC of CWA's then existing water system assets.

Act 12 was signed into law in 2016 and enables AQUA to offer purchase prices at multiples of the historical DOC approach. As a reminder, at the end of 2016 AQUA served 430,559 water and 20,440 wastewater customers (presumably acquired via DOC) and between January 1, 2017 and December 31, 2023, Act 12 acquisitions represented 11.39% of water customer and 93.52% of wastewater customer growth. A basic question is whether or not Act 12 promotes competition and/or unjustly enriches a selling entity at the expense of AQUA's non-Act 12 acquired customers?

The above said, Act 11 and 12 do not promote (even remotely – emphasis added) public benefit beyond the population of the municipality or municipalities who is/are the recipients of the net proceeds from selling their water and/or wastewater system assets for significantly greater than historical approaches such as DOC. This limited population benefits (if assumptions are accurate) from tax increase avoidance (or in the possible sale of CWA a bail-out from Act 47 / bankruptcy) for a period of time following the financial close on the sale of the system assets; all of which at the expense of AQUA rate payers. A basic question to ask is whether or not any selling utility would have sold their water and/or wastewater system assets absent the existence of Act 12? Suggested answer: Likely not.

For the above reasons the PUC should deny AQUA's Application as approving it only enables AQUA to fuel its growth through acquisition goals at the expense of its customers due to the excessive purchase prices paid by AQUA pursuant to Act 12. If, however, the PUC should approve AQUA's Application it should not enable AQUA to seek a return on that portion of purchase price above the DOC of COBF's wastewater system assets. AQUA's return on that portion of the purchase price above DOC should instead be recovered (to include interest expense) from the customers connected

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<sup>8</sup> See previous footnote

<sup>9</sup> Net plant in its 2022 Financials available on DCED's website suggest \$287.898M with an estimated DOC of \$230M

<sup>10</sup> <https://www.delcotimes.com/2021/10/14/chester-asks-receiver-to-approve-purchase-agreement-with-aqua/>

to the COBF's system assets until those assets have either been fully depreciated or retired. Lastly, the PUC should note in its Order<sup>11</sup> that Act 11 not be applied for the benefit of the wastewater customers of the COBF system at any time in the future.

### **Deficiency in public notice and billing information related to Act 11 and Act 12**

Act 11 was signed into law in 2012 and reads, in part, as follows: "*The [PUC], when setting base rates, after notice and an opportunity to be heard, may allocate a portion of the wastewater revenue requirement to the combined water and wastewater customer base if in the public interest.*" Hence, the PUC can choose not to require AQUA's water customers to subsidize the wastewater revenue requirement for the benefit of AQUA's wastewater customers paying less than the true cost of service they receive from AQUA. In AQUA's prior rate case – over two years ago – the PUC approved \$11,186,732/year of its water revenues allocated to benefit its wastewater customers. AQUA's May 23, 2024, filing with the PUC is again (emphasis added) seeking Act 11 subsidy from its water customers for the benefit of its wastewater customers. At the end of 2023 it is estimated that that at least 1/3 of AQUA's wastewater customers are not water customers of AQUA. It is also estimated that approximately 91% or > 415k of AQUA's water customers obtain wastewater service from an entity<sup>12</sup> other than AQUA.

Like the notice received in connection with COBF's wastewater acquisition, AQUA's water customers received similar notices for at least 7 of the wastewater acquisitions noted herein. However, when one receives their monthly water bill there is no reference as to the value of the wastewater subsidy component in their bill. This practice is very deceptive and requires attention with respect to the value of wastewater subsidy in their water bill for the benefit of AQUA's wastewater customers. Meanwhile, AQUA's wastewater customers are not paying the true cost of service – at least so long as the PUC enables AQUA to continue with this deceptive practice by approving the employment of Act 11 now and in the future. Our legislators should include repealing Act 11 going forward too.

Act 12 indicative rates outlined in AQUA's August 26, 2021, bid seem to be misleading and may result in a false sense of security in the Seller and its customers. Please see Exhibit 1, at pages 1-3. The indicative rates seem to start with a false beginning and end in year 10 with a COBF customer paying less than an AQUA Zone 1-5 customers today. This seems to be potentially

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<sup>11</sup> See 66 Pa. C.S. § 1329 (d)(3)(ii) as the PUC could include literally any "[a]dditional conditions of approval as may be required by the commission" in its Order approving an acquisition

<sup>12</sup> The entities could include a customer's own septic system; a customer's homeowners' association that owns and operates a wastewater system that includes treatment; or even a municipal entity.

deceptive, and the PUC should request and review (as noted in Exhibit 1) AQUA's financial model to ensure that their indicative rates were employed in their financial model(s) approved internally by both AQUA and its parent.

For the above reasons the PUC should deny AQUA's Application as approving it only enables AQUA to fuel its growth through acquisition goals at the expense of its customers due to the excessive purchase prices paid by AQUA pursuant to Act 12. If, however, the PUC should approve AQUA's Application it should not enable AQUA to seek a return on that portion of purchase price above the DOC of COBF's wastewater system assets. AQUA's return on that portion of the purchase price above DOC should instead be recovered (to include interest expense) from the customers connected to COBF's system assets until those assets have either been fully depreciated or retired. The PUC should note in its Order<sup>13</sup> that Act 11 not be applied for the benefit of the wastewater customers of the COBF system at any time in the future.

Furthermore, all customer bills going forward should include information on Act 11 subsidies paid by water customers for the benefit of AQUA's wastewater customers. At a minimum a line item should be included that specifically calls out the subsidy that the water customers are paying to support the revenue requirement for these wastewater customers, plus DSIC attributed to this subsidy. This too could be required by the PUC when it issues its Order.<sup>14</sup>

### **Public Utility Commission's ("PUC") Reasonableness Review Ratio to Act 12 pricing**

It is recognized that the PUC plays a significant role in ensuring that customers of those entities the PUC regulates receive quality service at reasonable rates. However, although its efforts with respect to its Reasonable Review Ratio ("RRR")<sup>15</sup> may have been well intentioned, it is recognized that RRR is non-binding vis-à-vis Act 12 pricing and to suggest that 1.68 times the depreciated original cost of a selling entity's water or wastewater system assets is contrary to the historical practice of the use of DOC. In the event that AQUA would like to pay a value north of DOC that additional purchase price would be considered as goodwill on the part of AQUA, which it is not entitled to in rates. It seems to also suggest that the PUC is endorsing that AQUA's customers pay 68% more than they otherwise would in rates for the purchase of each Act 12 acquisition. Maybe that's an approach in the right direction in lieu of numbers north of 100% or as high as 637% higher

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<sup>13</sup> See 66 Pa. C.S. § 1329 (d)(3)(ii) as the PUC could include literally any "[a]dditional conditions of approval as may be required by the commission" in its Order approving an acquisition

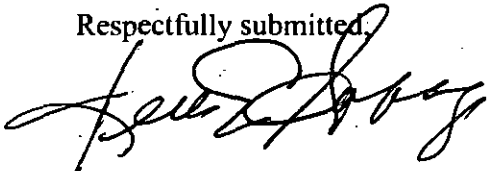
<sup>14</sup> See footnote 13

<sup>15</sup> See Docket M-2016-2543193 for Final Supplemental Implementation Order at <https://www.puc.pa.gov/pcdocs/1836178.pdf>

due to the Act 12 purchase price for COBF of up to \$41.25M. This also seems to suggest that with the implementation of Act 11, that the PUC also endorses that AQUA have its water customers subsidize its growth through acquisition strategy when pursuing wastewater systems throughout the Commonwealth of Pennsylvania. The RRR falls short of fairness for the benefit of AQUA's rate payers and should simply require purchase prices consistent with DOC methodology,

With the above in mind, the PUC should deny AQUA's Application as approving it only enables AQUA to fuel its growth through acquisition goals at the expense of its customers due to the excessive purchase prices paid by AQUA pursuant to Act 12. If, however, the PUC should approve AQUA's Application it should not enable AQUA to seek a return on that portion of purchase price above the DOC of COBF's wastewater system assets. AQUA's return on that portion of the purchase price above DOC should instead be recovered (to include interest expense) from the customers connected to COBF's system assets until those assets have either been fully depreciated or retired. The PUC should note in its Order<sup>16</sup> that Act 11 not be applied for the benefit of the wastewater customers of the COBF system at any time in the future.

Respectfully submitted,



Keith E. Gabage  
Water Customer of Aqua Pennsylvania, Inc.  
607 Plum Run Drive  
West Chester, PA 19382  
gabagek@gmail.com

Dated: October 10, 2024

DATE OF DEPOSIT

OCT 10 2024

PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

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<sup>16</sup> See 66 Pa. C.S. § 1329 (d)(3)(ii) as the PUC could include literally any "[a]dditional conditions of approval as may be required by the commission" in its Order approving an acquisition

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PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU



*Exhibit 1 Pg 4 of 5*

**NOTICE OF PROPOSED ACQUISITION AND RATE BASE ADDITION**  
Docket No. A-2022-3033138

Dear Customer:

On June 27, 2024, the Pennsylvania Public Utility Commission (PUC) conditionally accepted for filing the application of Aqua Pennsylvania Wastewater, Inc. (Aqua) for approval to acquire the City of Beaver Falls (Beaver Falls) wastewater system assets. Beaver Falls serves approximately 3,200 customers in Beaver County, Pennsylvania. Aqua's application also requests that the PUC authorize an addition of up to \$41.25 million to Aqua's rate base pursuant to 66 Pa. C.S. § 1329. A utility's rate base is the value of property used by the utility to provide service to its customers and is one of several components used to establish a utility's customer rates.

Aqua periodically makes applications to the PUC for newly acquired systems which requires Aqua to send these types of notices. This notice is specific to the Beaver Falls acquisition.

Aqua is not requesting a rate increase in this acquisition proceeding and it is not included in Aqua's current base rate case application pending before the PUC. Accordingly, this acquisition will not immediately, but may in the future, affect water and/or wastewater bills of Aqua customers, including the new Beaver Falls wastewater customers. Your rates will not change as a result of this transaction until the conclusion of an Aqua rate case where Aqua includes the Beaver Falls system and requests and receives PUC approval to increase its rates. At that time, based on a preliminary analysis of the potential rate impacts, Aqua estimates that the rates of the average customer could increase. The amount of the increase will be determined in Aqua's next base rate case and will be dependent on how the PUC chooses to apportion the increase among Aqua's acquired and existing customers. The tables below present non-binding, estimated incremental rate effects of the proposed rate base addition on Aqua's existing water and wastewater customers:

**Aqua Wastewater Customers**

Rate Class	Average Usage	Estimated Monthly Increase	Estimated Percentage Increase
Residential	4,000 gal/month	\$5.09	6.03%
Commercial/Public	8,330 gal/month	\$8.09	6.03%
Industrial	1,500 gal/month	\$2.76	6.03%

**Aqua Water Customers**

Rate Class	Average Usage	Estimated Monthly Increase	Estimated Percentage Increase
Residential	4,000 gal/month	\$0.58	0.75%
Commercial/Public	33,380 gal/month	\$3.30	0.75%
Industrial	200,150 gal/month	\$16.01	0.75%

The amounts stated above could change and will depend on how the PUC chooses to apportion any increase among the types of service, rate zones, and classes of customers.

## **PUC ROLE**

The state agency which approves acquisitions and rates for regulated public utilities is the PUC. The PUC will review and investigate the proposed acquisition and requested \$41.25 million in additional rate base. After examining the evidence, the PUC may approve, modify or deny the acquisition and may approve or modify the \$41.25 million addition to rate base. The PUC will issue a decision on the application on or around March 2025.

## **ACTIONS YOU CAN TAKE**

You can support or challenge Aqua's request by:

- 1) Sending a letter to the PUC. You can tell the PUC why you support or object to Aqua's acquisition of Beaver Falls' wastewater system in your letter. This information can be helpful when the PUC investigates the application. Send your letter to the Pennsylvania Public Utility Commission, Post Office Box 3265, Harrisburg, PA 17105-3265.
- 2) Attending or presenting testimony at a PUC Public Input Hearing. You can attend or be a witness at a PUC public input hearing. The PUC holds public input hearings if it opens an investigation into Aqua's transaction and there is enough interest in the case. At these hearings, you can present your views in person to the PUC judge and to company representatives. Testimony under oath becomes part of the application case record. The PUC holds these hearings in the service area of the company. For more information, call the PUC at 1.800.692.7380.
- 3) Filing a protest or a petition to intervene. If you want to be a party to the case, you must file a protest or a petition to intervene. You then have an opportunity to take part in all the hearings about the proposed acquisition. You can receive copies of all materials distributed by the other parties. Protests and petitions to intervene must be filed in accordance with 52 Pa. Code (relating to public utilities) on or before November 4, 2024. Filings must be made with the Secretary of the Pennsylvania Public Utility Commission at P.O. Box 3265, Harrisburg, PA 17105-3265, with a copy served on Aqua's counsel at Post & Schell, P.C., Attn: Michael Hassell, 17 North Second Street, 12<sup>th</sup> Floor, Harrisburg, PA 17101.

The documents filed as part of this application are available for inspection and copying at the Office of the Secretary of the PUC between 8 a.m. and 4:30 p.m., Monday through Friday, on the PUC's website at [www.puc.pa.gov](http://www.puc.pa.gov) and at Aqua's offices at 762 West Lancaster Avenue, Bryn Mawr, PA 19010. The PUC docket number is A-2022-3033138.

DATE OF DEPOSIT

OCT 10 2024

PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

CERTIFICATE OF SERVICE

Application of Aqua Pennsylvania :  
Wastewater, Inc. pursuant to Sections 1102, :  
1329 and 507 of the Public Utility Code for : Docket No. A-2022-3033138  
Approval of its Application of the Wastewater :  
System Assets of the City of Beaver Falls :

I hereby certify that I have this day served a true copy of the following document, PROTEST OF KEITH E. GABAGE, upon the 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 persons listed below. This document was filed via certified mail with the Public Utility Commission's Secretary.

Dated this 11<sup>th</sup> day of October 2024.

SERVICE BY EMAIL ONLY

Carrie B. Wright, Esq.  
Bureau of Investigation & Enforcement  
Pennsylvania Public Utility Commission  
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*Counsel for Aqua PA WW, Inc.*

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*Counsel for Municipal Protestants  
Petterson Heights, Patterson Township,  
West Mayfield Borough, White Township*

Emily Farren, Esq, et al  
Office of Consumer Advocate  
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[HBreitman@paoca.org](mailto:HBreitman@paoca.org)  
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Keith E. Gabage  
Aqua PA Water - Water Customer  
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[gabagek@gmail.com](mailto:gabagek@gmail.com)

 10/11/2024

Gabege  
607 Plum Run Drive  
West Chester, PA 19382

LTCBCRE

OCT 15 2024

PA PUBLIC UTILITY COMMISSION  
RETURN RECEIPT  
REQUESTED

CERTIFIED MAIL



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RDC 99



Retail



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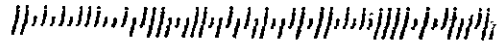
Rosemary Chiavetta, Secretary  
Pa PUC  
P.O. Box 3265  
Harrisburg, PA 17105-3265

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\$10.99

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OCT 10, 2024

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**CMPC**

**717-705-1952**

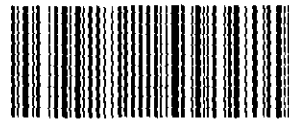
**To: PUC MASTER**

Agency: PUC

Floor:

External Carrier: PRIORITY

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OF THE RETURN ADDRESS, FOLD AT DOTTED LINE