

COMMONWEALTH OF PENNSYLVANIA



PATRICK M. CICERO  
Consumer Advocate

OFFICE OF CONSUMER ADVOCATE  
555 Walnut Street, 5th Floor, Forum Place  
Harrisburg, Pennsylvania 17101-1923  
(717) 783-5048  
(800) 684-6560

 @pa\_oca  
 /pennoca  
FAX (717) 783-7152  
consumer@paoca.org  
www.oca.pa.gov

November 20, 2024

**Via Electronic Filing**

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

Re: Nunc Pro Tunc Petition of Pennsylvania-  
American Water Company for Limited  
Waiver of 52 Pa. Code § 56.11(a) and Related  
Tariff Provisions  
Docket No. P-2024-3051518

Secretary Chiavetta:

Attached for electronic filing please find the Office of Consumer Advocate's Notice of Intervention and Public Statement for the above-referenced proceedings.

Sincerely,

/s/ Christy Appleby  
Christy Appleby  
Senior Assistant Consumer Advocate  
PA Attorney I.D. # 85824  
CApplby@paoca.org

Enclosures:

cc: The Honorable Charles E. Rainey, (Email Only)  
Dan Searfoorce and Sean Donnelly, BTUS (email only: dsearfoorce@pa.gov;  
sdonnelly@pa.gov)  
Office of Special Assistants (email only: ra-OSA@pa.gov)  
Certificate of Service

CERTIFICATE OF SERVICE

Nunc Pro Tunc Petition of Pennsylvania- :  
American Water Company for Limited Waiver :  
of 52 Pa. Code § 56.11(a) and Related Tariff : Docket No. P-2024-3051518  
Provisions :  
:

I hereby certify that I have this day served a true copy of the following document, the Office of Consumer Advocate’s Notice of Intervention, 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. This document was filed electronically on the Commission’s electronic filing system.

Dated this 20<sup>th</sup> day of November, 2024.

SERVICE BY E-MAIL ONLY

Allison Kaster, Esquire  
Director  
Bureau of Investigation & Enforcement  
400 North Street  
Commonwealth Keystone Building  
Harrisburg, PA 17120  
akaster@pa.gov

Steven Gray, Esquire  
Office of Small Business Advocate  
Forum Place  
555 Walnut Street, 1<sup>st</sup> Floor  
Harrisburg, PA 17101  
sgray@pa.gov

John W. Sweet, Esquire  
Ria M. Pereira, Esquire  
Elizabeth R. Marx, Esquire  
Laura Berman, Esquire  
118 Locust Street  
Harrisburg, PA 17101  
PULP@pautilitylawproject.org  
*Counsel For CAUSE*

Teresa K Harrold, Esquire  
Elizabeth Rose Triscari, Esquire  
Pennsylvania-American Water Company  
852 Wesley Drive  
Mechanicsburg, PA 17055  
Teresa.harrold@amwater.com  
Elizabeth.triscari@amwater.com

*Counsel for:*  
Office of Consumer Advocate  
555 Walnut Street  
5th Floor, Forum Place  
Harrisburg, PA 17101-1923  
717-783-5048

/s/ Christy Appleby  
Christy Appleby  
Senior Assistant Consumer Advocate  
PA Attorney I.D. # 85824  
CAppleby@paoca.org

Barrett Sheridan  
Assistant Consumer Advocate  
Bsheridan@paoca.org

Dated: November 20, 2024

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Nunc Pro Tunc Petition of Pennsylvania- : Docket No. P-2024-3051518  
American Water Company for Limited :  
Waiver of 52 Pa. Code § 56.11(a) and Related :  
Tariff Provisions :

---

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 captioned proceeding. The attorneys listed below in the signature line will represent the OCA in this proceeding and service should be directed to them at the information shown below.

Respectfully submitted,

/s/ Christy Appleby

Christy Appleby  
Senior Assistant Consumer Advocate  
PA Attorney I.D. # 85824  
CAappleby@paoca.org

Counsel for:  
Patrick M. Cicero, Consumer Advocate  
Office of Consumer Advocate  
555 Walnut Street  
5<sup>th</sup> Floor, Forum Place  
Harrisburg, PA 17101-1923  
Phone: 717-783-5048  
Fax: 717-783-7152

Barrett C. Sheridan  
Assistant Consumer Advocate  
PA Attorney I.D. # 61138  
BSheridan@paoca.org

Dated: November 20, 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 October 3, 2024, Pennsylvania-American Water Company (PAWC or Company) filed a *Nunc Pro Tunc* Petition seeking a limited waiver of 52 Pa. Code § 56.11(a) and related tariff provisions. In its Petition, PAWC states that from August 26, 2024 until September 12, 2024, two billing system upgrades resulted in a “technical issue” that caused approximately 96,000 customers to not receive a paper bill or notification of their electronic bill. Petition, ¶¶ 2, 8. Section 56.11(a) and the Company’s related water and wastewater tariff provisions provide that customers must be provided with a bill for each billing cycle, and PAWC seeks a limited waiver of these provisions for the August 26, 2024 through September 12, 2024 billing cycles.

The Consumer Advocate has determined that it is necessary to participate in this proceeding in order to protect the interests of PAWC’s customers. The Office of Consumer Advocate will seek to ensure that the adequate service is provided to all customers in accordance with applicable statutes, Commission regulations and Commission Orders.