



COMMONWEALTH OF PENNSYLVANIA

November 26, 2024

**E-FILED**

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-2024-3051519**

Dear Secretary Chiavetta:

Enclosed please find the Notice of Intervention, Public Statement, and Verification on behalf of the Office of Small Business Advocate (“OSBA”), in the above-referenced proceeding.

Copies will be served on all known parties in this proceeding, as indicated on the attached Certificate of Service.

If you have any questions, please do not hesitate to contact me.

Sincerely,

*/s/ Steven C. Gray*

Steven C. Gray  
Senior Attorney  
Assistant Small Business Advocate  
Attorney ID No. 77538

*Enclosures*

cc: Kevin Higgins  
Parties of Record

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

<b>Nunc Pro Tunc Petition of Pennsylvania</b>	:	
<b>American Water Company for Limited</b>	:	<b>Docket No. P-2024-3051519</b>
<b>Waiver of 52 Pa. Code § 56.11(a) and</b>	:	
<b>Related Tariff Provisions</b>	:	

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**NOTICE OF INTERVENTION  
OF THE OFFICE OF SMALL BUSINESS ADVOCATE**

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The Office of Small Business Advocate (“OSBA”) files this Notice of Intervention with respect to the *Nunc Pro Tunc* Petition of Pennsylvania-American Water Company for Limited Waiver of 52 Pa. Code § 56.11(a) and Related Tariff Provisions that was filed with the Pennsylvania Public Utility Commission (“Commission”) on October 3, 2024. In support of this Notice of Intervention, the OSBA avers as follows:

1. The OSBA is an agency of the Commonwealth of Pennsylvania authorized by the Small Business Advocate Act (Act 181 of 1988, 73 P.S. §§ 399.41 - 399.50) to represent the interest of small business consumers as a party in proceedings before the Commission.

2. Representing the OSBA in this proceeding is:

Steven Gray, Esq.  
Senior Attorney  
Assistant Small Business Advocate  
Office of Small Business Advocate  
Forum Place  
555 Walnut Street, 1st Floor  
Harrisburg, PA 17101  
(717) 783-2525  
[sgray@.pa.gov](mailto:sgray@.pa.gov)

Respectfully submitted,

*/s/ Steven Gray*

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Steven Gray  
Senior Attorney  
Assistant Small Business Advocate  
Attorney I.D. No. 77538

For: NazAarah Sabree  
Small Business Advocate

Commonwealth of Pennsylvania  
Office of Small Business Advocate  
Forum Place  
555 Walnut Street, 1st Floor  
Harrisburg, PA 17101

Date: November 26, 2024

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

<b>Nunc Pro Tunc Petition of Pennsylvania</b>	:	
<b>American Water Company for Limited</b>	:	<b>Docket No. P-2024-3051519</b>
<b>Waiver of 52 Pa. Code § 56.11(a) and</b>	:	
<b>Related Tariff Provisions</b>	:	

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**PUBLIC STATEMENT OF  
THE OFFICE OF SMALL BUSINESS ADVOCATE**

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The Small Business Advocate is authorized and directed to represent the interest of small business consumers of utility services in Pennsylvania under the provisions of the Small Business Advocate Act, Act 181 of 1988, 73 P.S. §§ 399.41 - 399.50 (the “Act”). The Act further provides that the Small Business Advocate is to issue publicly a written statement stating concisely the specific interest of small business consumers to be protected by her initiation of or intervention in any proceeding involving those interests before the Public Utility Commission or any other agency or court. This public statement relates to the filing today by the Small Business Advocate of a Notice of Intervention (“NOI”) in the *Nunc Pro Tunc* Petition of Pennsylvania-American Water Company (“PAWC” or the “Company”) for Limited Waiver of 52 Pa. Code § 56.11(a) and Related Tariff Provisions that was filed with the Pennsylvania Public Utility Commission (“Commission”) on October 3, 2024.

The Small Business Advocate files this NOI to protect the interests of PAWC’s small business customers that could be affected by the program set forth in the Petition.

The Small Business Advocate will participate in proceedings before the Public Utility Commission to investigate the reasonableness of proposals set forth in the Petition. The Small


Business Advocate will ask the Commission to deny any aspect of the Petition that is not proven to be lawful, just, reasonable, and non-discriminatory.

Dated: November 26, 2024

**VERIFICATION**

I, NazAarah Sabree, hereby state that the facts set forth herein above are true and correct to the best of my knowledge, information and belief and that I expect to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa. C.S. § 4904 (relating to unsworn falsification to authorities).

Date: November 26, 2024

  
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(Signature)

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**Nunc Pro Tunc Petition of Pennsylvania** :  
**American Water Company for Limited** : **Docket No. P-2024-3051519**  
**Waiver of 52 Pa. Code § 56.11(a) and** :  
**Related Tariff Provisions** :

**CERTIFICATE OF SERVICE**

I hereby certify that true and correct copies of the foregoing have been served via email (*unless otherwise noted below*) upon the following persons, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

The Honorable Mark A. Hoyer  
Deputy Chief Administrative Law Judge  
Pennsylvania Public Utility Commission  
301 Fifth Avenue  
Suite 220, Piatt Place  
Pittsburgh, PA 15222  
[mhoyer@pa.gov](mailto:mhoyer@pa.gov)

Allison Kaster, Esquire  
Director  
Bureau of Investigation & Enforcement  
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Commonwealth Keystone Building  
Harrisburg, PA 17120  
[akaster@pa.gov](mailto:akaster@pa.gov)

Christy Appleby, Esquire  
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DATE: November 26, 2024

*/s/ Steven C. Gray*  
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Steven C. Gray  
Senior Attorney  
Assistant Small Business Advocate  
Attorney I.D. No. 77538